

Phase 1 & 2 Comparison – For Applicable Manufacturers and Applicable Group Purchasing Organizations (GPOs)

With 2013 Data to Report to Open Payments

Question		Phase 1	Phase 2
EIDM Registration	1. Who needs to obtain EIDM credentials?	Authorized officials only.	Any individual who will need to access the Open Payments system. This includes individuals representing applicable manufacturers, applicable GPOs, physicians, and teaching hospitals.
	2. What Open Payments user role should I request in EIDM?	There are four role options available for Open Payments system users within EIDM. Users must select “Open Payments User.” Users will not be granted access to any other role.	Same as Phase 1
	3. Where can I find instructions on how to register in EIDM?	Instructions on how to register in EIDM can be found on the Open Payments Program Registration page, including step-by-step screenshots .	Same as Phase 1
	4. How do individuals and entities outside of the United States register in EIDM?	Foreign residents and entities will need to contact the Open Payments Help Desk at OpenPayments@cms.hhs.gov for assistance with EIDM registration.	Same as Phase 1
	5. What is the Remote Identity Proofing (RIDP) Process and who is subject to it?	Any individual requesting access to the Open Payments application will go through Remote Identity Proofing (RIDP). RIDP verifies an individual’s identity and grants him or her access to the Open Payments application. RIDP will be performed in the EIDM system when the Open Payments user role is requested following successful registration.	Same as Phase 1
	6. Whom do I contact if my EIDM registration or Open Payments user role request failed?	Contact the Open Payments Help Desk at OpenPayments@cms.hhs.gov for assistance with failed EIDM registration.	Same as Phase 1

Question		Phase 1	Phase 2
Open Payments Registration	1. What actions are required in the Open Payments system?	No action is required (or allowed) in the Open Payments system at this time. The only page users can access in the Open Payments system during Phase 1 is the Registration Home Page (accessible after EIDM registration is completed), where users can download the instruction document and sample template to complete Phase 1 aggregate data submission.	Required actions are entity and authorized official registration, submission of detailed 2013 payment data, legal attestation to the accuracy of the data, and review and correction of submitted detailed data.
	2. What user roles are available in the Open Payments system?	No user roles are assigned in the Open Payments system during Phase 1.	<p>Users from applicable manufacturers and applicable GPOs can choose from three user roles:</p> <p><u>Officer</u>: Manage the entity in Open Payments system; nominate (approve) other individuals for submitter and attester roles.</p> <p><u>Submitter</u>: Submit data in Open Payments system on behalf of the applicable manufacturer or applicable GPO; edit payments or other transfers of value and ownership or investment interests submitted to the Open Payments system.</p> <p><u>Attester</u>: Attest to validity of data in Open Payments system on behalf of the applicable manufacturer or applicable GPO.</p> <p>Additional information for each role will be provided prior to the launch of Phase 2.</p>

	Question	Phase 1	Phase 2
	3. Where can I find instructions on how to register in the Open Payments system?	Registration in the Open Payments system is not available at this time. The only page users can access in the Open Payments system during Phase 1 is the Registration Home Page (accessible after EIDM registration is completed), where users can download the instruction document and sample template to complete Phase 1 aggregate data submission.	Instructions have not yet been released for applicable manufacturer and applicable GPO registration. An instruction document detailing the registration process will be released prior to the launch of Phase 2 and posted on the Open Payments website. Check the Open Payments Program Registration page periodically for updates.
	4. How do individuals and entities outside of the United States register in Open Payments?	No registration is required (or allowed) in the Open Payments system at this time for individuals and entities outside of the United States.	Individuals and entities outside of the United States follow the same procedures as those located in the United States.
	5. How do I associate myself with multiple entities when I register in the Open Payments system?	<p>No separate EIDM registrations are required if a single authorized official is managing multiple entities. An authorized official will use only one EIDM user ID to associate him- or herself with all of the entities he or she manages. Multiple registrations for one official within EIDM is not allowed.</p> <p>In Phase 1, authorized officials managing multiple entities should submit a separate email and CSV file for EACH entity. The authorized official's EIDM user name should populate the first column of each CSV file submitted to ensure he or she is associated with each entity submitted.</p>	Authorized officials will be able to link their personal profile with multiple entity profiles within the Open Payments system. Guidance on how this is completed is forthcoming.

Question		Phase 1	Phase 2
Data Submission	1. What data is submitted?	The information to be submitted in Phase 1 is limited corporate profile information and aggregate payment data. A template containing all of the required fields can be found on the Open Payments Data Submission and Attestation page or on the Open Payments system Registration Home Page (accessible after EIDM registration is completed).	The information to be submitted in Phase 2 is more extensive than in Phase 1. Refer to the Open Payments User Guide for guidance on the types of payments and individual data fields. Users may also refer to the Open Payments Data Submission and Attestation page for additional data submission resources.
	2. Who can submit data?	Authorized officials or their designees.	Only individuals holding the role of “Submitter” can submit data in the Open Payments system.
	3. What is the difference between the CSV files that need to be submitted containing Open Payments data?	<p>The CSV file submitted in Phase 1 contains limited corporate profile information and aggregate payment data from the 2013 program year. This CSV file will be no longer than 2 rows. The top row will contain headers and the second row will contain the corporate and aggregate payment data.</p> <p>The CSV template to be used in Phase 1 resides on the Open Payments Data Submission and Attestation page on the Open Payments website. It can also be found on the Registration Home Page of the Open Payments system (accessible after EIDM registration is completed).</p>	<p>The CSV file(s) submitted during Phase 2 contain the detailed payments or transfers of value made during the 2013 program year. These CSV files may contain multiple rows of data for reporting general, research, and investment/ownership interest payments or other transfers of value as required. Sample CSV files for General Payments, Research Payments, and Physician Ownership/Investor are now available.</p> <p>In addition to CSV files, Open Payments will also accept XML files during Phase 2. For detailed information on Phase 2 reporting requirements, as well as the XML and CSV sample files and XML schema, visit the Open Payments Data Submission and Attestation page. Additional information about each type of payment can be found in the Open Payments User Guide.</p>

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	4. How is consolidated reporting handled?	<p>Consolidated reporting cannot be performed in Phase 1.</p> <p>All users who need to report payments through the Open Payments system need to register in EIDM regardless of whether or not they will be submitting a consolidated report in Phase 2. It is suggested that entities begin discussions prior to Phase 2 as to whether they will be submitting a consolidated report.</p>	<p>Users will have the ability to submit a consolidated report containing data from multiple entities that are associated with the same parent entity. All subsidiaries within the parent entity will be able to view the consolidated submissions, though only the parent entity that made the submission will be able to modify them.</p>
	5. How will I be notified of errors in my submissions?	<p>Individuals sending email submissions will be notified via email should their submission contain errors. They will be informed of the errors and asked to resubmit corrected files.</p>	<p>For Manual Data Entry: Users will be notified if their submission contains errors by an on-screen error message. They will not be able to proceed to the next page until the entry errors are corrected.</p> <p>For Bulk File Uploads: Users will be notified of any errors in their data submission via email. An error file will be available within the Open Payments system that contains details on the records and types of errors associated with their file submission.</p>
	6. How do I attest to payment records that have been submitted?	<p>No attestation occurs in Phase 1.</p>	<p>Attestation occurs after all of the records submitted by the entity for that program year have been submitted and successfully validated. During attestation, submitters may submit assumptions text explaining the assumptions made and methodologies used when they reported payments or other transfers of value, or ownership or</p>

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			<p>investment interests. Assumption information will be entered in a free-form text box with a maximum of 4,000 characters (including spaces).</p> <p>Attestation can only be performed by an individual assigned to the role of attester in the Open Payments system.</p>
	7.	How are assumptions submitted?	<p>Assumptions do not need to be submitted in Phase 1.</p> <p>Assumptions can be made during the Attestation process in Phase 2. Assumptions will be written in a free-form text box no longer than 4,000 characters (including spaces). There is no separate assumptions document that needs to be completed.</p>
	8.	How do I make corrections to submitted data?	<p>Authorized officials may submit an updated CSV file with corrections to a previously submitted file, though they are not required to do so. Users are encouraged to make any corrections to Phase 1 data in the Open Payments system during Phase 2.</p> <p>Users must log into the Open Payments system and make edits directly to the failed records in the file submission.</p> <p>Additional guidance on corrections is forthcoming.</p>
General	1.	What is the difference between the two phases?	<p>Phase 1 (February 18 through March 31) includes user registration in CMS’s Enterprise Portal (the gateway to CMS’s Enterprise Identity Management system (EIDM)) and the submission of corporate profile information and aggregate 2013 payment and investment interest data.</p> <p>Phase 2 (begins in May and extends for no fewer than 30 days) includes industry registration in the Open Payments system, submission of detailed 2013 payment and investment interest data, and legal attestation to the accuracy of the data.</p>

	Question	Phase 1	Phase 2
	2. What is the timeline for each phase?	Phase 1 is open from February 18, 2014 through March 31, 2014.	Phase 2 begins in mid-May 2014 and will be open for fewer than 30 days. Specific timelines will be released by CMS as they become available.
	3. How will these phases differ in the next program year?	Phase 1 was implemented only for the initial program year of 2013. For subsequent years, Phase 1 will not be used.	Phase 2 will continue for all subsequent program years and will be generally referred to as the Open Payments registration/data submission/attestation process.
	4. How do I designate someone to perform actions on my behalf?	Designating an individual to perform the Phase 1 email submission on behalf of an authorized official is an offline process. Authorized officials do not need notify CMS or EIDM of this designated individual's name. The designated individual does not need to register in EIDM in order to complete the Phase 1 submission. The designated individual may, however, choose to obtain EIDM credentials if he or she plans on filling a role for his or her entity within the Open Payments system.	Users may nominate additional individuals to perform certain actions on behalf of an entity within the Open Payments system. This is done through the "Nominations" process, whereby users can electronically nominate individuals to fill specific roles within the system. Further guidance and instructions on the nominations process will be forthcoming prior to the launch of Phase 2.
	5. What resources are available for guidance on each phase?	<p>Guidance for Phase 1, including the sample template and instruction document, can be found on the Open Payments Program Registration and Open Payments Data Submission and Attestation pages of the Open Payments website.</p> <p>Step-by-step instructions on EIDM registration are available in step-by-step instructions provided on the Open Payments website.</p> <p>The "Open Payments Phase 1 of 2 – Overview of</p>	<p>The Open Payments Program Registration and Open Payments Data Submission and Attestation pages of the Open Payments website contain information on Phase 2 registration and data submission.</p> <p>The Open Payments Events page contains information on all of our previously held webinars. Links to each archived live event and slide deck can be found on this page. The Open Payments User Guide is also available for reference.</p>

Question		Phase 1	Phase 2
		Industry Data Registration and Data Submission” webinar is available on the Open Payments Events page. You can view the archived event or download the slide deck .	
6.	How can I get answers to my questions about Open Payments?	A list of Open Payments FAQs is available online. You may also contact the Open Payments Help Desk at OpenPayments@cms.hhs.gov for additional guidance.	Same as Phase 1