

Instructions to Complete Phase 1 of 2013 Open Payments Registration & Data Submission

Step 1 – Should be Completed

Before reviewing these instructions, you should have already completed the first step in Phase 1 of the registration and submission process, which required the authorized official for your organization to register in CMS' Enterprise Identity Management system (EIDM) to receive an EIDM user ID. Note: The authorized official is an entity's executive level officer (e.g., Chief Executive Officer (CEO), Chief Financial Officer (CFO), Chief Compliance Officer (CCO), president, vice president, or other Officer of the applicable manufacturer or applicable group purchasing organization) who can legally represent their organization.

By March 31, 2014 the authorized official for your entity (or their designee) must complete a CSV data file of specified 2013 Open Payments information and submit it to CMS via email to OPdata@cms.hhs.gov. CMS will only accept data submitted in CSV format.

After the authorized official registers in EIDM, he/she can then manually delegate data submission responsibilities to others (referred to as authorized representatives). The delegate would obtain the authorized official's CMS user ID and use that information to complete data submission on the authorized official's behalf. This exchange is performed outside of CMS systems.

Please note that only one EIDM registration is needed for authorized officials representing multiple reporting entities.

Step 2 – Submit 2013 Aggregate Data File

The second and last step in Phase 1 is submission of a portion of the required 2013 Open Payments data to CMS, which will include corporate profile information and aggregate 2013 payment and investment interest data.

How to Prepare the Data Submission File for Phase 1

- **Access the sample template.** CMS will only accept data submitted using this template, in a pipe delimited CSV format (do not submit data formatted in Excel, Word, or other applications). Take the steps below to ensure that your CSV file is *pipe delimited*.



The sample template is available on the CMS Enterprise Portal page that will be displayed following the completion of EIDM registration (it is also available on the [Data Submission and Attestation page of the Open Payments website](#)). Note that this template differs from the schemas and sample files posted on the Open Payments website.

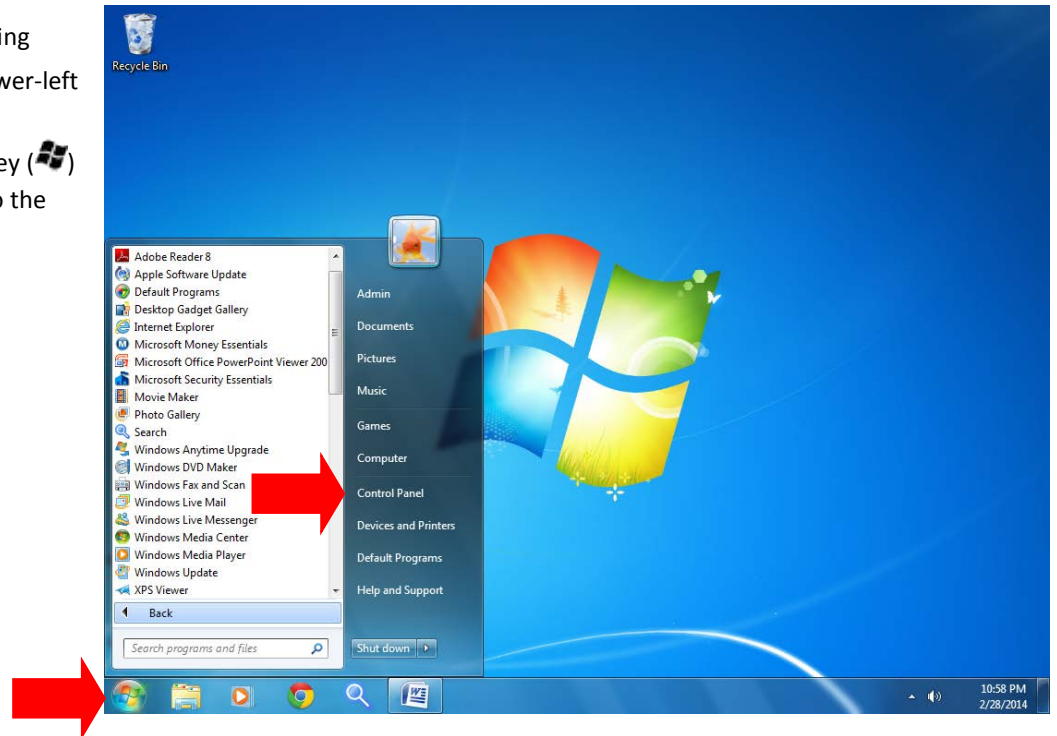
- **Create your CSV file.** CMS recommends using Microsoft Excel in Windows to create your CSV file. *To open and save the pipe delimited CSV file from Microsoft Excel in Windows, please ensure you have the list separator as a pipe: "|".*

Before You Begin Step 2

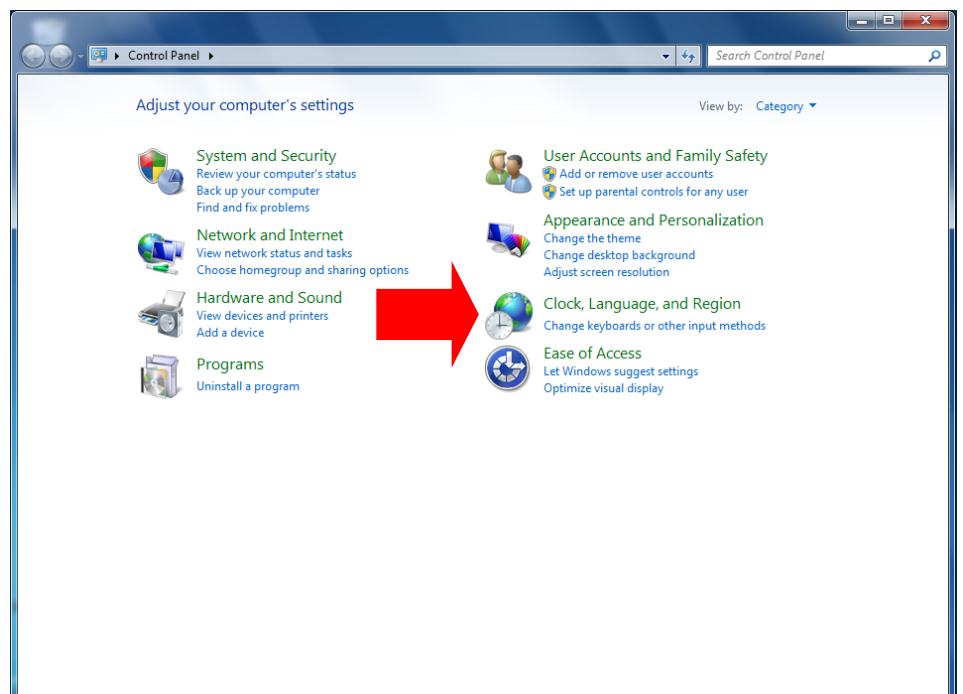
- Ensure that the appropriate technical professionals in your organization are familiar with this process including thoroughly reviewing this document..
- Follow provided instructions closely to create a compliant pipe delimited CSV file for submission.
- Get help from an IT professional to answer any formatting questions specific to your version of Microsoft Excel or technology platform, or for alternate ways of creating pipe delimited CSV files without Microsoft Excel.

- **Follow these steps if creating a pipe delimited CSV file in Windows Excel 2010.** The steps will not be very different if the user has another version of Excel, but there may be platform differences. Users should look up equivalent guidance for other versions of Excel or other operating systems if needed, and consult with their IT staff if they have any formatting questions specific to their version of Excel or platform, or for alternate ways of creating pipe delimited CSV files without MS Excel. Note that these instructions are also available in video format on the [Data Submission and Attestation page of the Open Payments website](#).

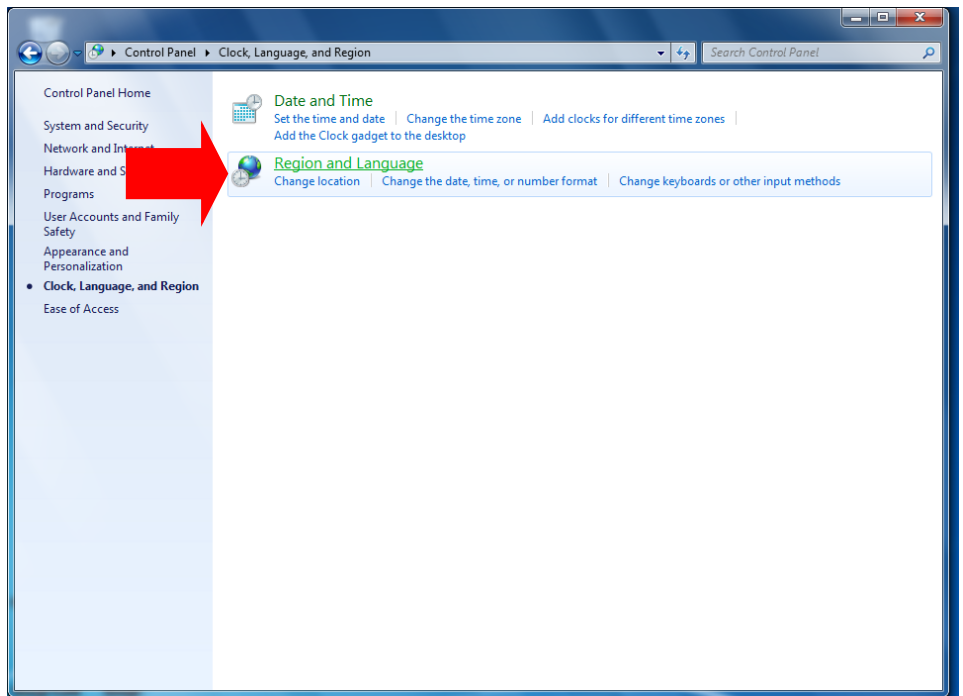
Open the Start menu by clicking the **Start** button  in the lower-left corner of your screen, or by pressing the Windows logo key () on your keyboard. Then go to the **Control Panel**.



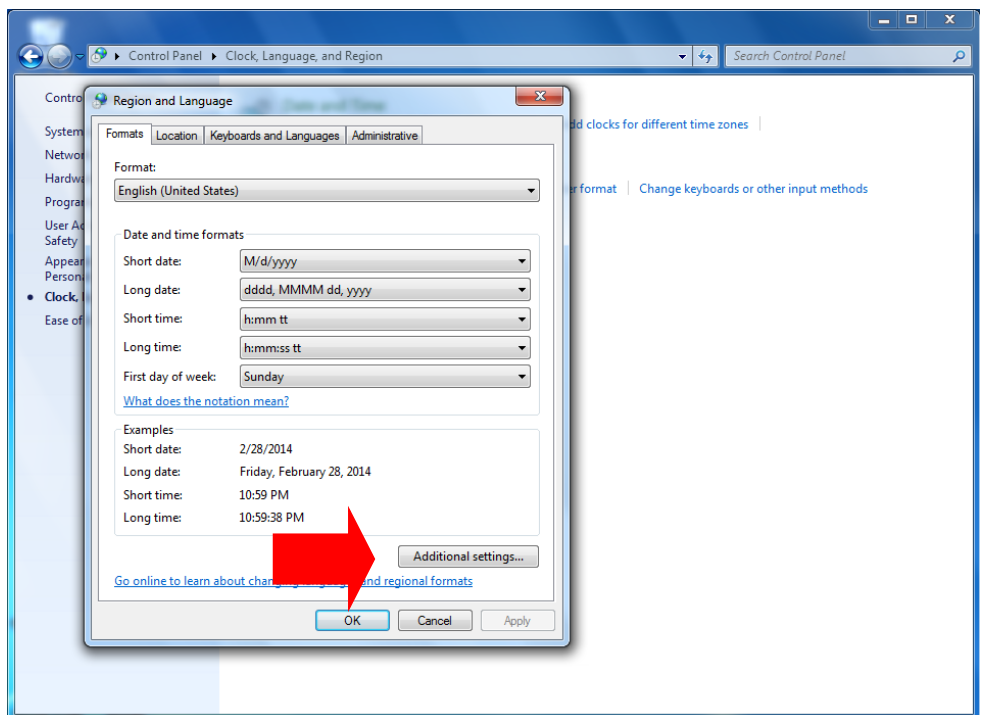
The Control Panel will appear. Click on **Clock, Language, and Region**.



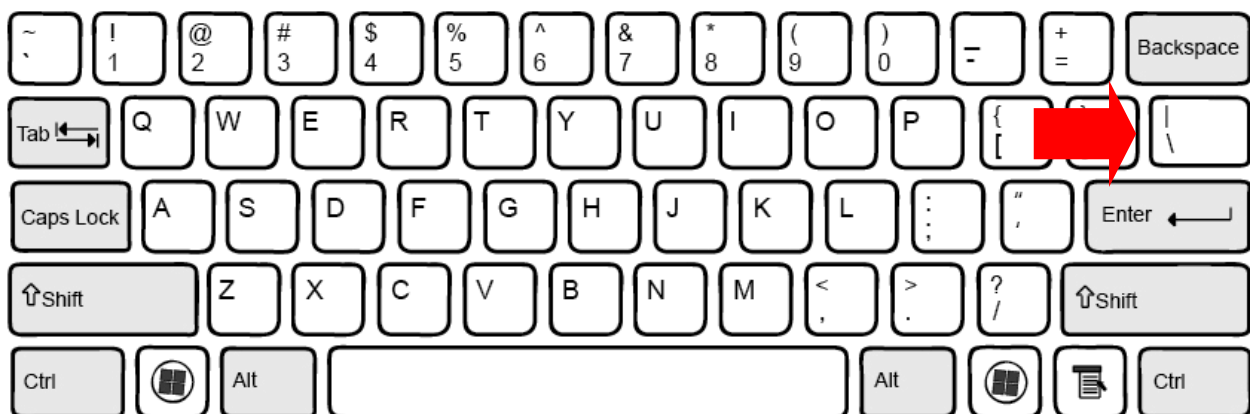
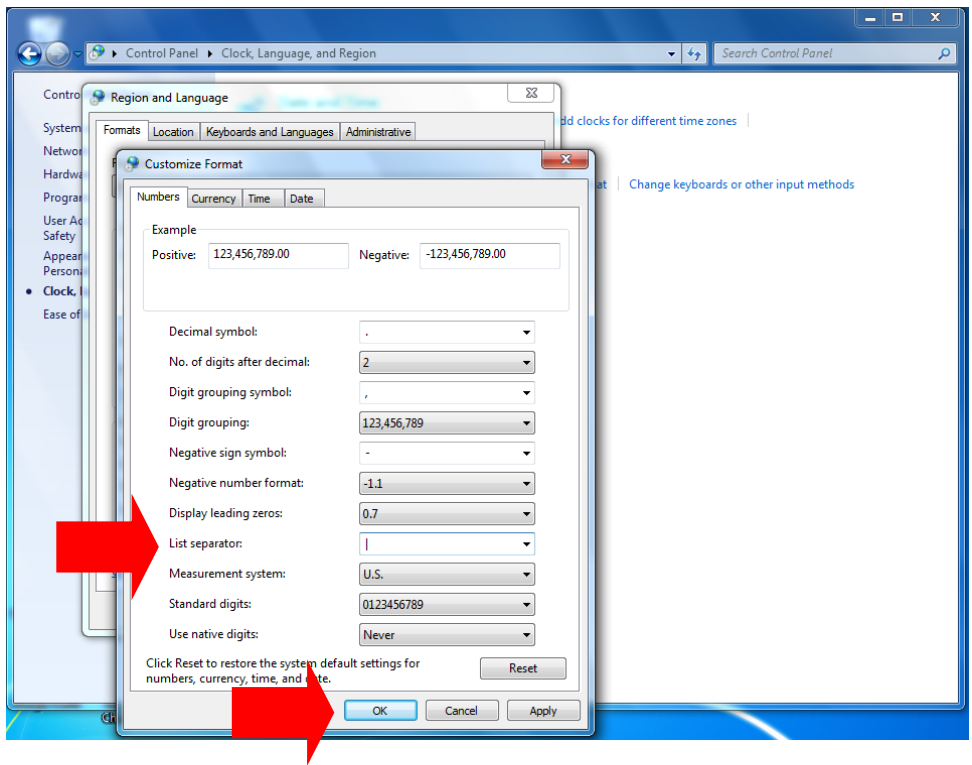
The **Clock, Language, and Region** menu will appear. Click on **Region and Language**.



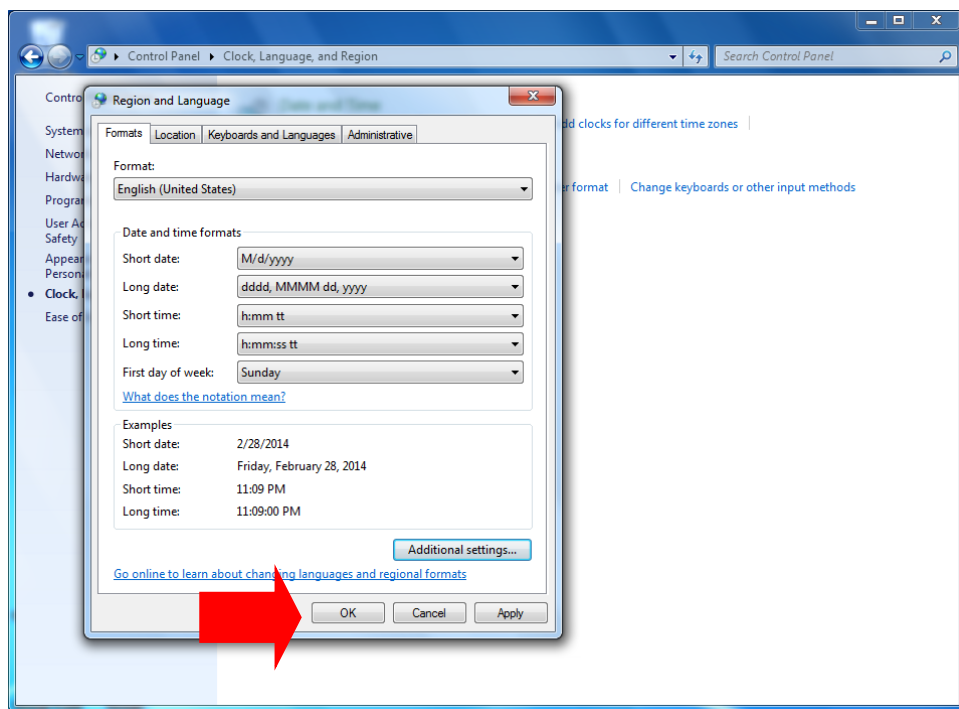
The **Region and Language** window will appear. Click on **Additional settings** button.



The **Customize Format** window will appear. Locate the **List separator** box and make sure the symbol specified is the pipe symbol (|), usually located at the top right section of the keyboard below the Backspace button (refer to the below image for a visual of how to locate the pipe symbol | on a keyboard.) Click the **OK** button.



Click **Ok** to close the prior window.



- **Enter data into the sample template.** Now that the list separator has been changed to pipe “|” in the system settings, the user can enter data into the sample template.

Open the Open Payments Phase 1 CSV sample template in Excel and enter your aggregate data for submission. **Do not modify or change the order or contents of the headings in the template.**

The screenshot displays the Microsoft Excel interface with the 'Data' tab selected. The ribbon includes options for 'Connections', 'Sort & Filter', and 'Data Tools'. The active worksheet is '2013 Open Payments data'. The data table is as follows:

	A	B	C	D	E
1	EIDM_USER_ID	REGISTERING_ENTITY_LEGAL_NAME	REGISTERING_ENTITY_BUSINESS_NAME	REGISTERING_ENTITY_BUSINESS_TYPE	PARENT_COMPANY_WEBSITE
2	sample123	Pharma, Inc	Pharma, Inc	applicable manufacturer-drugs/biologics	Pharma.com
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- The submitted data should include the following elements, as shown in the template – please submit only these data elements, and not any detailed data during Phase 1. Note that elements with an asterisk next to them (*) are required. If your data submission does not include any of the required data elements, you will be notified that your submission has been rejected:
 - Authorized official's EIDM user ID*
 - Registering entity legal name*
 - Registering entity's doing business as name*
 - Registering entity business type* – *You must use one of the following categories when entering this data:*
 - applicable manufacturer-drugs/biologicals
 - applicable manufacturer-devices/medical supplies
 - applicable manufacturer-drugs/biological and devices/medical supplies
 - applicable manufacturer-physician-owned distributor
 - applicable manufacturer-hospital-owned distributor
 - applicable manufacturer-distributor/supplier (non-hospital, non-physician-owned)
 - GPO-drugs/biologicals
 - GPO-devices/medical supplies
 - GPO- drugs/biological and devices/medical supplies
 - GPO-physician-owned
 - GPO-hospital-owned
 - GPO-hospital and physician-owned
 - GPO-non-hospital, non-physician-owned
 - GPO-government-owned
 - Website address/uniform resource locator (URL) of parent company
 - Registering entity business address line 1* (required for all addresses)
 - Registering entity business address line 2
 - Registering entity city* (required for all addresses)
 - Registering entity state* (required for U.S. addresses)
 - Registering entity zip code* (required for U.S. addresses) – *If you have a zip code that starts with a zero, be sure to include the beginning zero (you may need to format the zip code field as text so the leading zero is not dropped).*
 - Registering entity country* (required for addresses outside the U.S.)
 - Registering entity province
 - Registering entity postal code* (required for addresses outside the U.S.)
 - Registering entity business telephone number*
 - Aggregate information regarding the applicable manufacturer's or applicable GPO's 2013 payment report. *Note: If you have aggregate data to report for general payments or research payments, data for all three of the aggregate data elements is required. For example, if total aggregate amount is reported for the general payments category, total number of payments and total number of covered recipients must also be reported. Aggregate data for at least one of the three categories must be provided for submission to be accepted:*
 - Category 1: Research payments aggregate data:
 - i. Total aggregate amount (in dollars and cents) of research payments or other transfers of value the applicable manufacturer or applicable GPO has provided to covered recipients or physician owners/investors during the reporting period.

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- ii. Total number of payments or other transfers of value made.
 - iii. Total number of covered recipients (unique/non-duplicate) or physician owners/investors that were recipients of the payments or other transfers of value during the reporting period.
- Category 2: General payments aggregate data:
 - i. Total aggregate amount (in dollars and cents) of general payments or other transfers of value the applicable manufacturer or applicable GPO has provided to covered recipients or physician owners/investors during the reporting period (August 1, 2013 through December 31, 2013).
 - ii. Total number of payments or other transfers of value made.
 - iii. Total number of covered recipients (unique/non-duplicate) or physician owners/investors that were recipients of the payments or other transfers of value during the reporting period.
 - Category 3: Ownership or investment interests aggregate data:
 - i. Total number of physician owners or investors, or their immediate family members, who held ownership or investment interest in the entity during the reporting period.
- Please remember:
 - Do not delete or edit the header row in the CSV template.
 - If there is no data to report for a certain field, leave it blank. DO NOT enter spaces, "Not Applicable," "N/A," etc.
 - DO NOT format cells/columns in the file (unless you have a zip code that starts with a zero, and you have to format the zip code field as text so the leading zero is not dropped).
 - Only one data row is allowed in the CSV file, besides the header row.
 - Any files containing all empty data fields or only \$0 dollar amounts listed for all fields that require a dollar amount submission will be rejected.

Example of How to Enter Aggregate Data:

Payment or transfer of value scenario:

ABC Company made the following payments to Dr. Jones and Dr. Smith:

- 8/10/2013: \$51.10 to Dr. Jones
- 8/20/2013: \$100.20 to Dr. Smith
- 9/20/2013: \$101.50 to Dr. Jones

Data to enter into sample template:

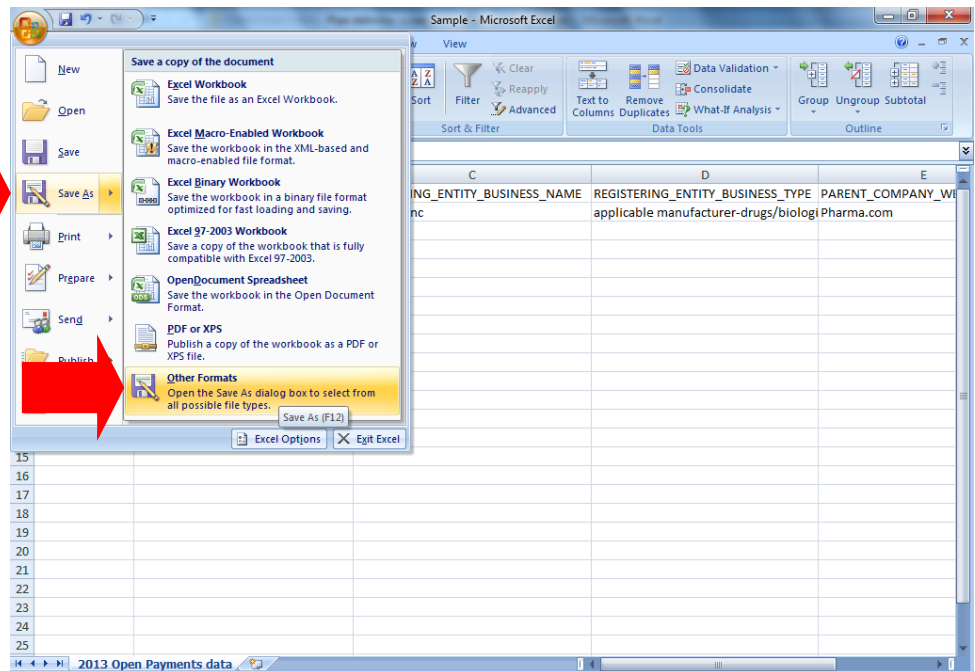
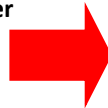
- Total aggregate amount (in dollars and cents) of general payments or other transfers of value the applicable manufacturer or applicable GPO has provided to covered recipients or physician owners/investors during the reporting period (August 1, 2013 through December 31, 2013): **enter \$252.80 into template**
- Total number of payments or other transfers of value made: **enter 3 in total into template**
- Total number of covered recipients (unique/non-duplicate) or physician owners/investors that were recipients of the payments or other transfers of value during the reporting period: **enter 2 covered recipients into template**

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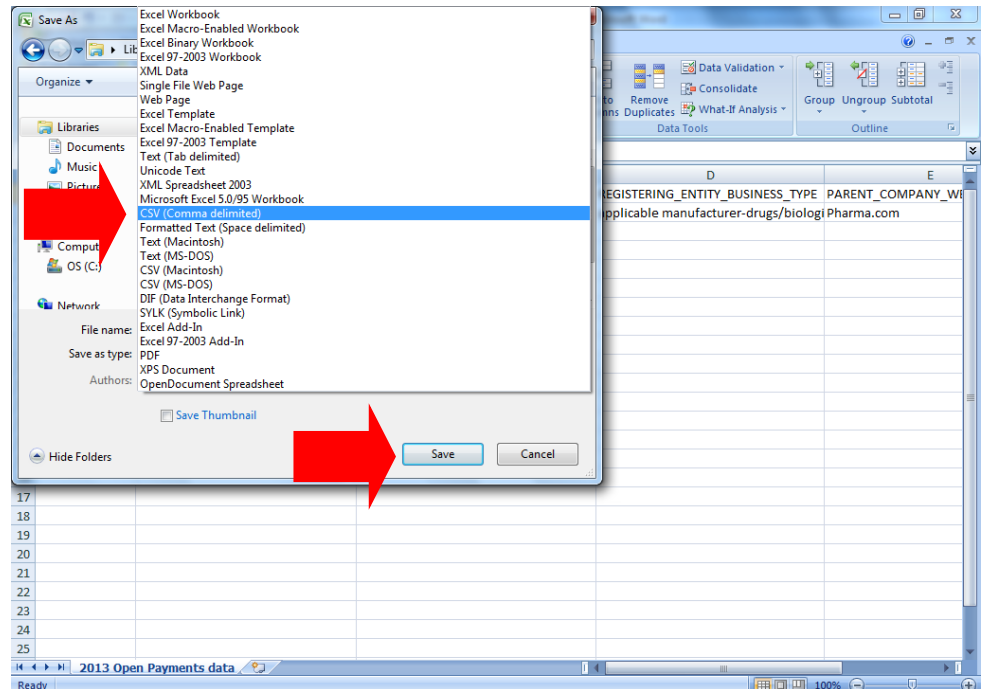
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- **Save your submission in CSV format.** Once data has been populated correctly in the sample template, save your submission in CSV format as shown below. Be sure to include the authorized official's EIDM user ID in the new file name.

To save your submission into CSV format, go to **File**, click on **Save As**, and select **Other Formats**.



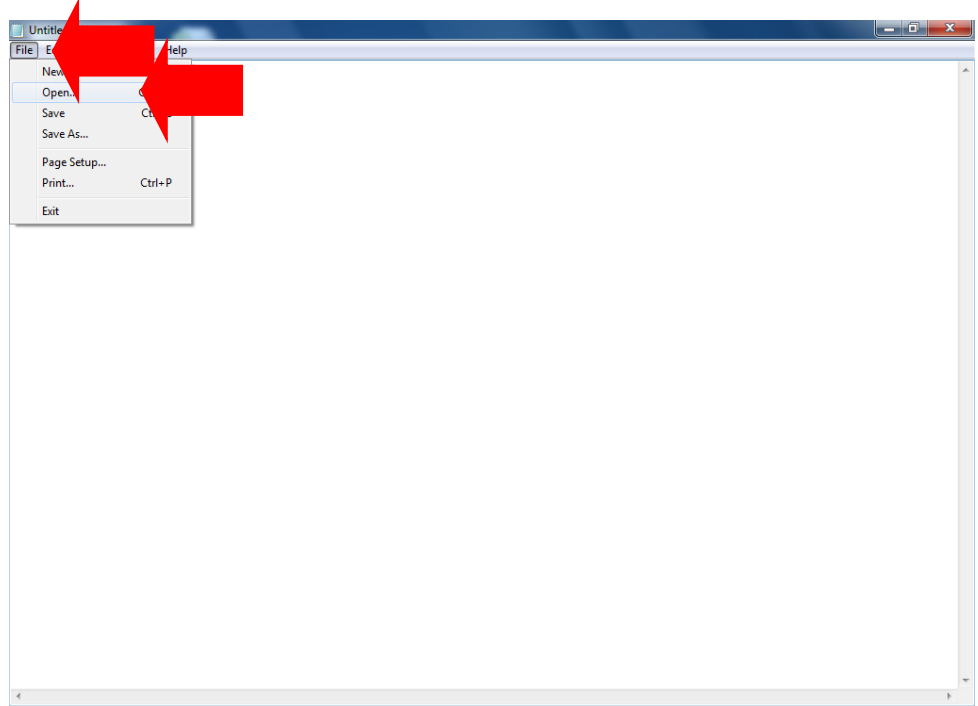
In the window that opens, select **CSV (Comma delimited)** and click on the **Save** button. The file will save as a pipe delimited CSV file (provided you followed the previous steps described in this document).



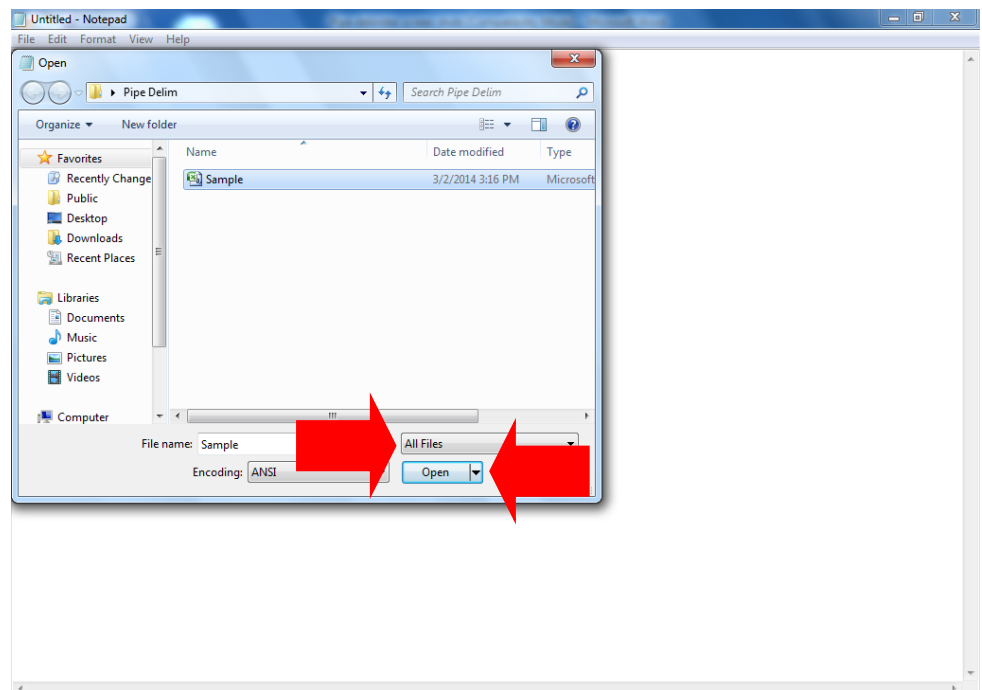
Optional step: To make sure the file saved correctly with the pipe delimiter, open the file in a text editor such as Notepad.

Follow these directions to view the contents of the CSV file you created in Notepad.

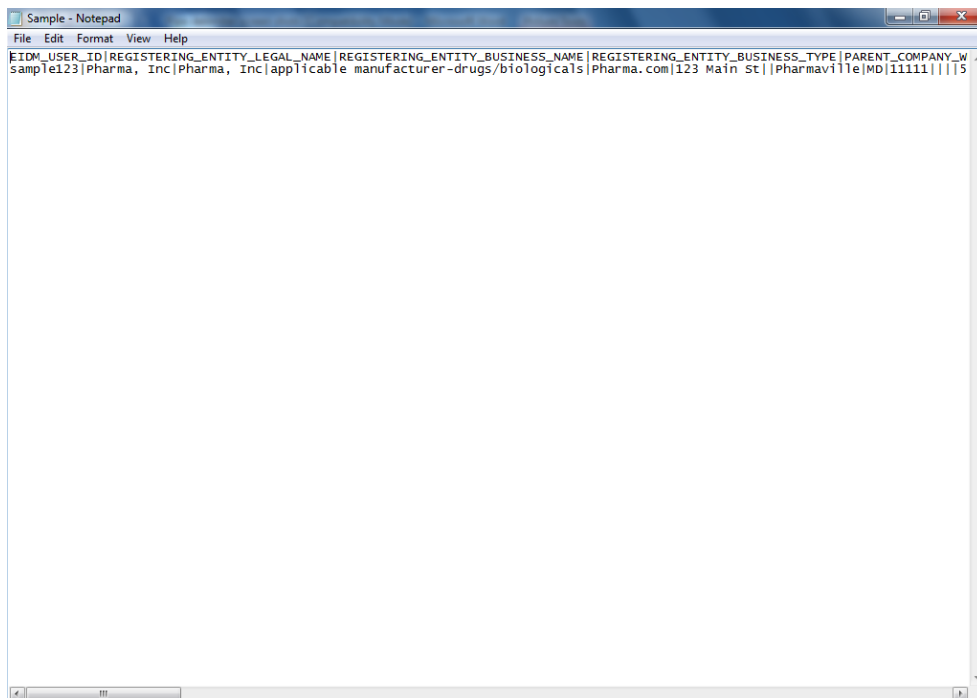
Open the Notepad program. Go to **File**, then to **Open**.



Make sure the file type dropdown in the bottom right corner of the window is set to **All Files**. Navigate to where you saved your CSV file and double-click it, or single click it and hit **Open**.



The CSV file contents will appear within the Notepad window. If you see your data fields separated with the pipe (|) character, your file saved correctly and is ready to be emailed to Open Payments. If you see your data fields separated with a comma, any other delimiter, or no delimiter at all, repeat all of the above steps or seek help from your IT staff. Close the Notepad window without saving.



- **Email your data submission to CMS.** After you have saved your submission in CSV format and confirmed that it is a pipe delimited CSV file, you may send your aggregate data submission to CMS at OPdata@cms.hhs.gov.
- Format your email subject line as follows: "EIDM User ID" [Note: Insert authorized official's EIDM user ID] then "– Open Payments Email Submission for 2013 Reporting Entity and Payment Aggregate Data."
- Do not attach multiple files to your email submission. Only one aggregate data file attachment is allowed for each individual email submission.
- **Email confirmation.** When the data submission is received by CMS via OPdata@cms.hhs.gov, the Open Payments Help Desk will review the attachment. The Help Desk will reply directly to the submitter, letting him/her know if the submitted data meets all requirements or if there is a problem, such as missing data elements or invalid formatting.
- **General CSV file guidelines if you DO NOT use the Windows Excel instructions detailed here:**
 - Fields with embedded pipe must be delimited with double quote characters. For example, if the business name is ABC|Co, then write it in the CSV file as "ABC|Co". Please note that the pipe character in ABC|Co is not a delimiter here, just an example of an embedded pipe.
 - Fields that contain double quote characters must be surrounded by consecutive double quotes. For example, ABC "Associated Business Company" would convert to "ABC "Associated Business Company""
 - Fields with embedded line-breaks are not allowed.
 - For Macintosh operating systems, it is recommended to use TextEditor to open and edit the files.

Support Resources

As described throughout this document, a sample CSV template is available for you to download (accessible via the CMS Enterprise Portal page that will be displayed following the completion of your EIDM registration, or on the [Data Submission and Attestation page of the Open Payments website](#)); use it to fill-in your entity's data. Refer to the instructions within this document for details and guidelines for creating pipe delimited CSV files in Windows Excel 2010, and note that these instructions are also available in video format on the [Data Submission and Attestation page of the Open Payments website](#).

If you have any questions about these instructions, using the sample template, or the two-phased approach to 2013 Open Payments registration and data submission, please contact the Open Payments Help Desk at openpayments@cms.hhs.gov.

What Happens Next

Once you submit your Phase 1 data file to CMS on behalf of your entity and receive the email confirmation, CMS (during Phase 2) will utilize your submitted data within the Open Payments system to create your entity profile and prepare for Phase 2 data submission (unless the Help Desk follows up with specific problems noticed in your submitted data).

When the Open Payments system launches for Phase 2 of data submission (approximately May, 2014), the authorized official in the officer role will need to:

- Use their EIDM user ID from Phase 1 and finalize Open Payments registration for the entity and the authorized official by providing additional information within the Open Payments system,
- Confirm the accuracy of the entity profile data that was submitted in Phase 1 and pre-populated in the Open Payments system for Phase 2, and
- Upload or enter, submit, and attest to the accuracy of the detailed 2013 payment data.

In addition, in Phase 2 the authorized official will also be able to delegate actions and roles to others at their entity, so they can also use the Open Payments system to upload or enter, submit, and attest to the 2013 data.

Note: After registration in the Open Payments system, the authorized official can nominate authorized representatives within their organization who can perform system functions on their behalf such as data submissions, corrections, attestations, etc. Any authorized representatives must obtain their EIDM user ID and register in the Open Payments data system to perform any functions.

We encourage you to sign up to receive emails about Open Payments. CMS uses our listserv to communicate to stakeholders about important program timelines and updates. To sign up for the listserv, visit <http://go.cms.gov/openpayments>.

Contact the Open Payments Help Desk at openpayments@cms.hhs.gov with any questions.