



Open Payments

Physician and Teaching Hospital Review and Dispute Demo

O P E N P A Y M E N T S

**CREATING PUBLIC TRANSPARENCY
INTO INDUSTRY - PHYSICIAN
FINANCIAL RELATIONSHIPS**

August 2014

CMS Disclaimer: This information is a summary of the final rule implementing Open Payments (Medicare, Medicaid, Children's Health Insurance Programs; Transparency Reports and Reporting of Physician Ownership or Investment Interests [CMS-5060-F], codified at 42 CFR Parts 402 and 403). The summary is not intended to take the place of the final rule which is the official source for information on the program.

Advisory on Dates

- Specific dates given within this webinar may no longer be current.
- Please check the Open Payments website (<http://go.cms.gov/openpayments>) for specific dates for system-related events.

Agenda

- Review Target Audience and Learning Objectives
- Overview of the Review and Dispute Process
- How Physicians/Teaching Hospitals
 - Navigate through the Open Payments system
 - Review the information submitted about them
 - Affirm the information that is correct
 - Dispute the information that is incorrect
 - Withdraw disputes previously initiated
- Dispute Resolution Process
- Next Steps
- Available Resources

Target Audience

- Physicians and teaching hospitals who wish to view and possibly dispute records submitted about them from applicable manufacturers or applicable GPOs (reporting entities)

Learning Objectives

- Obtain a detailed understanding of the Open Payments review, dispute, and resolution process
- Know how to affirm, initiate, and withdraw disputes in the Open Payments system

Review and Dispute for Physicians and Teaching Hospitals

Review and Dispute Overview

- Physicians and teaching hospitals can review and dispute records of payments or other transfers of value and physician ownership or investment interest submitted about them by reporting entities
- Reporting entities submitted data for the period Aug. 1- Dec. 31, 2013 (Program Year 2013)
- Physicians and teaching hospitals will need to work directly with reporting entities to resolve disputes initiated.
- CMS will not mediate the dispute resolution process between a physician and a reporting entity.
- In the Open Payments system, users may perform certain actions for each record

Reporting Entities	Physicians and Teaching Hospitals
<ul style="list-style-type: none">• Acknowledge Disputes• Resolve Disputes	<ul style="list-style-type: none">• Affirm Records• Initiate Disputes• Withdraw Disputes

Review and Dispute Overview (cont.)

- The review and resolution period for program year 2013:
 - 45 days for review, dispute, and correction
 - 15 additional days (immediately following the 45 day period) for reporting entities to continue to make corrections
- Changes made to records during this period will be included in the Sept. 2014 data publication
- Records that remain under dispute at the end of this period will be identified as disputed in the Sept. 2014 data publication

Review and Dispute Overview (cont.)

- Review and resolution capabilities are open year-round
- Disputes initiated after the 45-day review and dispute period may not be included in the Sept. 2014 publication of data, but will be included in the next publication of data

Review and Dispute Overview (cont.)

Timing of Dispute Initiation	Dispute Resolution Status Within 45-Day Initial Period or 15-Day Correction Period	Public Display Status
Within 45-day initial review, dispute, and correction period	Resolved	Published as non-disputed in September 2014
	Not resolved	Published as disputed in September 2014
After current 45-day initial review, dispute, and correction period, but before 45-day period preceding subsequent data refresh	Resolved	Published as non-disputed in both September 2014 and the subsequent data refresh; but note the values of non-disputed data are theoretically different
	Not resolved	Published as non-disputed in September 2014, and disputed in the subsequent data refresh

Review and Dispute Overview (cont.)

- Any data that is disputed during the review and dispute period, if not corrected by the reporting entity by the end of the period, will still be made public but will be identified as disputed
- **CMS will not mediate disputes between physicians/teaching hospitals and reporting entities**
- You may dispute or affirm any record that appears in your Open Payments view
- Visit the “Dispute and Resolution” page of the [Open Payments website \(http://go.cms.gov/openpayments\)](http://go.cms.gov/openpayments) for more information

Review and Dispute Timeline for Program Year 2013

Review and Dispute Period	Additional Correction Period
July 14-Aug. 27, 2014 (45 Days)	Aug. 28-Sept. 11, 2014 (15 Days)
<p>For:</p> <ul style="list-style-type: none"> Physicians Teaching hospitals Reporting entities 	<p>For:</p> <ul style="list-style-type: none"> Reporting entities
<p>Actions:</p> <ul style="list-style-type: none"> Physicians and teaching hospitals review, affirm, and dispute information reported about them or their institutions Reporting entities work with the disputing physician or teaching hospital to resolve the dispute 	<p>Actions:</p> <ul style="list-style-type: none"> Reporting entities make corrections Reporting entities may submit revised records and re-attest to the revised data Disputes initiated by physicians and teaching hospitals will not be published in the Sept. 2014 publication

Data Publication Dates

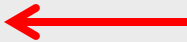
- Data Publication:
 - Initial publication year (Aug. 1-Dec. 31, 2013):
published by Sept. 30, 2014
 - Ongoing publication years (Jan. 1-Dec. 31):
published by June 30 of each subsequent year
- Data refresh publications will occur periodically
- Corrections made to data outside of the Review and Dispute period will appear in the next publishing of the data, either a refresh or with the next year's publication

Open Payments System and Review and Dispute Landing Pages

Teaching Hospital Landing Page

Open Payments (Sunshine Act)

Teaching Hospital [Switch User Type](#)



[Home](#)

Review and Dispute
Review, Affirm, Dispute

Manage Teaching Hospitals
Register, Edit, Nominate Roles

My Profile
Account, Roles, Nominations

Help

Welcome to the Open Payments System

You can manage your user profile and perform user role functions associated with your profile.



Access the Open Payments User Guide



Need help with the website?
Contact Us by email



Physician Landing Page

Open Payments (Sunshine Act)

Physician [Switch User Type](#)



[Home](#)

Review and Dispute

Review, Affirm, Dispute

My Profile

Account, Roles, Nominations

Help

Welcome to the Open Payments System



Access the Open Payments User Guide



Need help with the website?
Contact Us by email



Review and Dispute Landing Page

Open Payments (Sunshine Act)

Physician [Switch User Type](#)

[Home](#) [Review and Dispute](#) [My Profile](#) [Help](#)

[Review, Affirm, Dispute](#)

[Account, Roles, Nominations](#)

Review and Dispute - John Doe - 2013

[Back](#)

The table below contains only the records reported for the selected physician during the selected program year.

The list is organized by reporting entity, including reporting entities that reported made payments or other transfers of value to the physician, and reporting entities in which the physician has ownership or investment interests.

Only records that have been attested to by reporting entities will be displayed. Records that have not yet been attested to or are still being processed by a reporting entity will be made available for review only after attestation has been completed.

Please note: There is a horizontal scroll bar below the table, for you to use to view more columns in the table. Use the filtering tools below to customize your view of the disputed records.

To take an action related to a disputed record, select the check box in the first column of the table (next to the Entity Making Payment column). You may then perform the following actions on the selected record(s):

- Select "Affirm Record" to confirm the payment or other transfer of value, or ownership or investment interest.
- Select "Dispute Record" to dispute the payment or other transfer of value, or ownership or investment interest. You will need to provide a reasonable explanation for your dispute of the record.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record.

To return to the previous page, select "Back."

For more information about the review and dispute process, refer to the Open Payments User Guide.

Physician Records

Entity Making Payment: Record ID: Date Of Publication:

Dispute ID:

Review and Dispute Status:

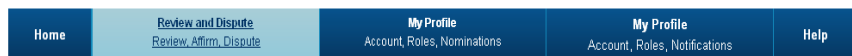
Payment Category: ☐ General Payments ☐ Research Payments ☐ Ownership or Investment Interest

Affirmed (Yes/No): ☐ Yes ☐ No

Showing Results for [All]

Show Entries 10

View Record Drilldown Page



Record ID: 10054


Back


Program Year: 2013
Entity: ABCDE Medical
Payment Category: General Payments
Consolidated Reporting: No

Last Modified Date: 2014-06-16
Last Modified By:
Submission Date: 2014-06-11
Submitted By: John Doe
Record Status: Attested
Override Status:
Associated Disputes and Statuses: 947 Withdrawn
967 Acknowledged
1045 Dismissed

Recipient Demographic Information

Covered Recipient Type: Physician
Physician First Name: John
Physician Middle Name:
Physician Last Name: Doe
Physician Name Suffix:
Recipient Business Street Address Line 1: 7500 Security Blvd
Recipient Business Street Address Line 2:
Recipient City: Baltimore
Recipient State: Maryland
Recipient Zip Code: 21244
Recipient Country: UNITED STATES
Recipient Province:
Recipient Postal Code:
Recipient Email Address:
Physician Primary Type: Medical Doctor
Physician NPI: 1518254366

 Access the Open Payments User Guide

 Need help with the website? Contact Us by email



Physician Primary Type: Medical Doctor

Physician NPI: 1518254366

Physician Specialty: 1234567890

Physician License State: VIRGINIA

Physician License Number: VA001

Physician License State:

Physician License Number:

Physician License State:

Physician License Number:

Physician License State:

Physician License Number:

Physician License State:

Physician License Number:

Associated Drug, Device, Biological, or Medical Supply Information

Product Indicator: Combination

Name of Associated Drug or Biological: 1. Prod_22

National Drug Code of Associated Covered Drug or Biological:

Name of Associated Covered Device or Medical Supply: 1. Prod_22, 2. Prod_4, 3. Prod_20, 4. Prod_11, 5. Prod_4

Transfer of Value (Payment) Information

Total Amount of Payment: 5000

Date of Payment: 20131104

Number of Payments Included in Total Amount: 1

Form of Payment or Transfer of Value: Cash or cash equivalent

Nature of Payment or Transfer of Value: Consulting Fee

General Record Information

Physician Ownership Indicator: No

Third Party Payment Recipient Indicator: Individual

Name of Third Party Entity Receiving Payment or Transfer of Value:

Charity Indicator: No

Third Party Equals Covered Recipient Indicator: No

Delay in Publication of Research Payment Indicator:

Contextual Information:

Back

Review and Affirm Overview

Review and Affirm Overview

- Physicians and teaching hospitals may review and affirm records associated with them
- Affirmation of records means that the physician or teaching hospital confirms that the information captured in the record is correct
- Affirming records is optional
- Records not affirmed by the physician or teaching hospital will still be published on the public-facing website

Review and Affirm Process Overview

Access the Open Payments System via the CMS Enterprise Portal and Select “Review and Dispute” Tab



Select the Teaching Hospital or Physician and Program Year



View Records and Select Records to Affirm



Review Records Marked for Affirmation and select “Affirm Records”

Review and Affirm Records Instructions

Step 1: Log into the Open Payments System via the CMS Enterprise Portal

Open Payments (Sunshine Act)

Physician [Switch User Type](#)

[Home](#)

Review and Dispute
Review, Affirm, Dispute

My Profile
Account, Roles, Nominations

[Help](#)

Welcome to the Open Payments System



Access the Open Payments User Guide



Need help with the website?
[Contact Us](#) by email



Step 2: Select “Review and Dispute” Tab

Open Payments (Sunshine Act)

Physician [Switch User Type](#)

Home

Review and Dispute
[Review, Affirm, Dispute](#)

My Profile
Account, Roles, Nominations

Help

Review and Dispute Overview

A field with an asterisk (*) is required.

Physician Records

Select the reporting entity and program year for which records relating to payments or other transfers of value, or ownership or investment interests are disputed. Then select “Show Disputes.”

There is an initial 45-day period for physicians and teaching hospitals to review and dispute their data before it is made public. Following that initial 45 days is an additional 15-day correction period for reporting entities to work with physicians and teaching hospitals to resolve disputes.

Physicians and teaching hospitals may initiate disputes with reporting entities at any time, not just during the above-mentioned periods. Note the information below to understand how the dispute initiation and resolution timing affects public display of the data.

- Disputes initiated within the initial 45-day review and dispute period, and resolved by the end of the additional 15-day correction period, will be published and tagged as non-disputed in the September 2014 publication of the data.
- Disputes initiated within the initial 45-day review and dispute period, and NOT resolved by the end of the additional 15-day correction period, will be published and tagged as disputed in the September 2014 publication of the data.
- Disputes initiated after the 45-day review and dispute period, and resolved by the beginning of the following review period, will be published and tagged as non-disputed in both the September 2014 data publication and subsequent data publications (however, the values of the published data will be different for each of these publications, per the dispute resolution).
- Disputes initiated after the 45-day review and dispute period, and NOT resolved by the beginning of the following review period, will be published and tagged as non-disputed in the current display status (September 2014) and tagged as disputed in the upcoming data release display status.

Only records for which initial attestation was completed before the start of the review and dispute period will be considered for publication in the September 2014 publication of data.

For a complete list of detailed rules around data publication, refer to the [Open Payments User Guide](#).

* Choose a Physician:

John Doe

* Program Year:

2013

Show Records



Access the Open Payments User Guide



Need help with the website?
Contact Us by email



Step 3: Select Records to Affirm

Open Payments (Sunshine Act)

Physician [Switch User Type](#)

Home

Review and Dispute
[Review](#) [Affirm](#) [Dispute](#)

My Profile
Account, Roles, Nominations

Help

Review and Dispute - John Doe - 2013

[Back](#)

The table below contains only the records reported for the selected physician during the selected program year.

The list is organized by reporting entity, including reporting entities that reported made payments or other transfers of value to the physician, and reporting entities in which the physician has ownership or investment interests.

Only records that have been attested to by reporting entities will be displayed. Records that have not yet been attested to or are still being processed by a reporting entity will be made available for review only after attestation has been completed.

Please note: There is a horizontal scroll bar below the table, for you to use to view more columns in the table. Use the filtering tools below to customize your view of the disputed records.

To take an action related to a disputed record, select the check box in the first column of the table (next to the Entity Making Payment column). You may then perform the following actions on the selected record(s):

- Select "Affirm Record" to confirm the payment or other transfer of value, or ownership or investment interest.
- Select "Dispute Record" to dispute the payment or other transfer of value, or ownership or investment interest. You will need to provide a reasonable explanation for your dispute of the record.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record.

To return to the previous page, select "Back."

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

Physician Records

Entity Making Payment: Please Select	Record ID: <input type="text"/>	Date Of Publication: Please Select
Dispute ID: <input type="text"/>	Review and Dispute Status: <input type="checkbox"/> Initiated <input type="checkbox"/> Acknowledged <input type="checkbox"/> Resolved No Change <input type="checkbox"/> Withdrawn <input type="checkbox"/> Resolved	Payment Category: <input type="checkbox"/> General Payments <input type="checkbox"/> Research Payments <input type="checkbox"/> Ownership or Investment Interest
		Affirmed (Yes/No): <input type="checkbox"/> Yes <input type="checkbox"/> No
		Search Clear All

Showing Results for: [All]

Show Entries 10

[Affirm Record](#) [Dispute Record](#) [Withdraw Dispute](#)

Select	Entity Making Payment	Record ID	Dispute ID	Payment Category	Form Of Payment or Transfer of Value	Nature Of Payment or Transfer of Value	Date of Payment	Amount(s)	Delay In Publication of Research Payment Indicator	Last Modified Date	Current Record Standing
<input checked="" type="checkbox"/>	ABCDE Medical	10054		General Payments	Cash or cash equivalent	Consulting Fee	2013-11-04	\$5,000.00	No	2014-07-02	Attested
<input type="checkbox"/>	ABCDE Medical	10055		General Payments	Cash or cash equivalent	Grant	2013-10-21	\$7,500.00	No	2014-07-02	Attested
<input type="checkbox"/>	ABCDE Medical	10055		General Payments	Cash or cash equivalent	Education	2013-12-11	\$1,500.00	No	2014-07-02	Attested

Page 1 of 1

Page 1

Step 4: Review Records and Select “Affirm Records”

Open Payments (Sunshine Act)

Physician [Switch User Type](#)

Home

[Review and Dispute](#)
Review, Affirm, Dispute

[My Profile](#)
Account, Roles, Nominations

Help

Affirm Records

John Doe - 2013

[Back](#)

Select "Affirm Records" to confirm the payments or other transfers of value, or ownership or investment interests reported by the entity are accurate and valid.

To return to the previous page, select "Cancel."

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

You are affirming the following [1] record(s):

Record ID	Entity Making Payment	Date of Payment	Amount (\$)	Record Status	Review and Dispute Status
10054	ABCDE Medical	2013-11-04	\$5,000.00	Attested	

[Cancel](#)

[Affirm Records](#)

Step 5: View Affirmation Confirmation

Open Payments (Sunshine Act)

Physician [Switch User Type](#)

Home

[Review and Dispute](#)
[Review, Affirm, Dispute](#)

My Profile

Account, Roles, Nominations

Help

Review and Dispute - John Doe - 2013

[Back](#)

You have successfully affirmed the following record(s):

Record Id
10054

The table below contains only the records reported for the selected physician during the selected program year.

The list is organized by reporting entity, including reporting entities that reported made payments or other transfers of value to the physician, and reporting entities in which the physician has ownership or investment interests.

Only records that have been attested to by reporting entities will be displayed. Records that have not yet been attested to or are still being processed by a reporting entity will be made available for review only after attestation has been completed.

Please note: There is a horizontal scroll bar below the table, for you to use to view more columns in the table. Use the filtering tools below to customize your view of the disputed records.

To take an action related to a disputed record, select the check box in the first column of the table (next to the Entity Making Payment column). You may then perform the following actions on the selected record(s):

- Select "Affirm Record" to confirm the payment or other transfer of value, or ownership or investment interest.
- Select "Dispute Record" to dispute the payment or other transfer of value, or ownership or investment interest. You will need to provide a reasonable explanation for your dispute of the record.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record.

To return to the previous page, select "Back."

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

Physician Records

Entity Making Payment:

Please Select

Record ID:

Please Select

Date Of Publication:

Please Select

Dispute ID:

Review and Dispute Status:

Initiated
Acknowledged
Resolved No Change
Withdrawn
Resolved

Payment Category:

☐ General Payments
☐ Research Payments
☐ Ownership or Investment Interest

Affirmed (Yes/No):

☐ Yes
☐ No

Search

Clear All

Showing Results for: All

Show Entries 10

[Affirm Record](#)

[Dispute Record](#)

[Withdraw Dispute](#)

Entity Making Payment	Date of Publication	Amount(s)	Delay in Publication of Research Payment Indicated	Last Modified Date	Current Record Standing	Review and Dispute Status	Date Dispute Initiated	Dispute Last Modified By	Affirmed (Yes/No)	History Of Dispute
sp or cash payment	Consulting Fee	2013-11-04	\$5,000.00	No	2014-07-02	Attested			Yes	
sp or cash payment	Grant	2013-10-21	\$7,500.00	No	2014-07-02	Attested			No	
sp or cash payment	Education	2013-12-11	\$1,500.00	No	2014-07-02	Attested			No	

<

>

Page 1 of 1

Page

1

Go

[Affirm Record](#)

[Dispute Record](#)

[Withdraw Dispute](#)

Entity Making Payment	Date Dispute Initiated	Dispute Last Modified By	Affirmed (Yes/No)	History Of Dispute
			Yes	
			No	
			No	

Reminders for Reviewing and Affirming Records

- **Make sure you have:**
 - **Registered in EIDM**
 - **Successfully registered in the Open Payments system**
- Physicians or physician authorized representatives may affirm records
- Physician authorized representatives must hold the “Dispute Records” access level to affirm, review, and dispute records
- Authorized officials and authorized representatives for teaching hospitals have the same access levels and all may affirm records
- Records that have been affirmed can still be disputed at any time

Initiating Disputes

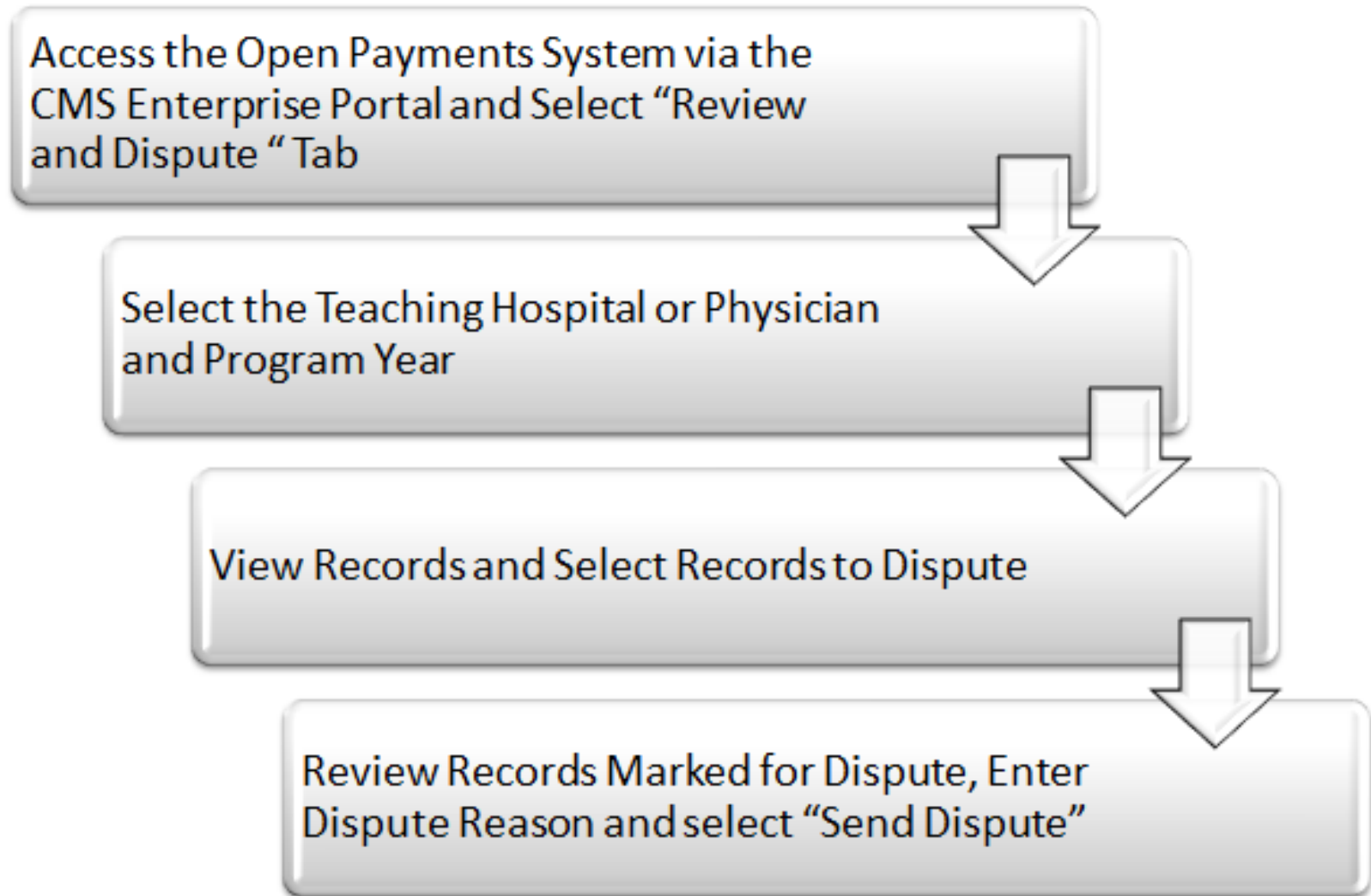
Initiating Disputes Overview

- Physicians and teaching hospitals will have 45 days to initiate disputes for those disputes to be included in Sept. 2014 data publication
- Once a dispute is initiated, the reporting entity will receive an email notification
- The reporting entity may acknowledge the dispute in the Open Payments system
- The physician or teaching hospital will receive an email notification if the dispute has been acknowledged by the reporting entity
- The dispute status can be viewed in real-time on the Review and Dispute screen in the Open Payments system

Review and Dispute Record Statuses

- Initiated – The dispute has been initiated by the physician or teaching hospital
- Acknowledged – The dispute has been acknowledged by the reporting entity
- Resolved No Change – The reporting entity and physician or teaching hospital have resolved the dispute in accordance with the Final Rule and no changes were made to the disputed record
- Resolved – The dispute has been resolved by the reporting entity with updates made to the record
- Withdrawn – The dispute has been withdrawn by the physician or teaching hospital

Initiating Disputes Process Overview



Initiating Disputes Instructions

Step 1: Log into the Open Payments System via the CMS Enterprise Portal

Open Payments (Sunshine Act)

Physician [Switch User Type](#)

[Home](#)

Review and Dispute

Review, Affirm, Dispute

My Profile

Account, Roles, Nominations

Help

Welcome to the Open Payments System



Access the Open Payments User Guide



Need help with the website?
Contact Us by email



Step 2: Select “Review and Dispute” Tab

Open Payments (Sunshine Act)

Physician [Switch User Type](#)

Home

Review and Dispute
[Review](#), [Affirm](#), [Dispute](#)

My Profile
Account, Roles, Nominations

Help

Review and Dispute Overview

A field with an asterisk (*) is required.

Physician Records

Select the reporting entity and program year for which records relating to payments or other transfers of value, or ownership or investment interests are disputed. Then select “Show Disputes.”

There is an initial 45-day period for physicians and teaching hospitals to review and dispute their data before it is made public. Following that initial 45 days is an additional 15-day correction period for reporting entities to work with physicians and teaching hospitals to resolve disputes.

Physicians and teaching hospitals may initiate disputes with reporting entities at any time, not just during the above-mentioned periods. Note the information below to understand how the dispute initiation and resolution timing affects public display of the data.

- Disputes initiated within the initial 45-day review and dispute period, and resolved by the end of the additional 15-day correction period, will be published and tagged as non-disputed in the September 2014 publication of the data.
- Disputes initiated within the initial 45-day review and dispute period, and NOT resolved by the end of the additional 15-day correction period, will be published and tagged as disputed in the September 2014 publication of the data.
- Disputes initiated after the 45-day review and dispute period, and resolved by the beginning of the following review period, will be published and tagged as non-disputed in both the September 2014 data publication and subsequent data publications (however, the values of the published data will be different for each of these publications, per the dispute resolution).
- Disputes initiated after the 45-day review and dispute period, and NOT resolved by the beginning of the following review period, will be published and tagged as non-disputed in the current display status (September 2014) and tagged as disputed in the upcoming data release display status.

Only records for which initial attestation was completed before the start of the review and dispute period will be considered for publication in the September 2014 publication of data.

For a complete list of detailed rules around data publication, refer to the [Open Payments User Guide](#).

* Choose a Physician:

John Doe

* Program Year:

2013

Show Records



Access the Open Payments User Guide



Need help with the website?
Contact Us by email



Step 3: Select Records to Initiate Dispute

Open Payments (Sunshine Act)

Physician [Switch User Type](#)

Home

Review and Dispute
[Review](#), [Affirm](#), [Dispute](#)

My Profile
Account, Roles, Nominations

Help

Review and Dispute - John Doe - 2013

[Back](#)

The table below contains only the records reported for the selected physician during the selected program year.

The list is organized by reporting entity, including reporting entities that reported made payments or other transfers of value to the physician, and reporting entities in which the physician has ownership or investment interests.

Only records that have been attested to by reporting entities will be displayed. Records that have not yet been attested to or are still being processed by a reporting entity will be made available for review only after attestation has been completed.

Please note: There is a horizontal scroll bar below the table, for you to use to view more columns in the table. Use the filtering tools below to customize your view of the disputed records.

To take an action related to a disputed record, select the check box in the first column of the table (next to the Entity Making Payment column). You may then perform the following actions on the selected record(s):

- Select "Affirm Record" to confirm the payment or other transfer of value, or ownership or investment interest.
- Select "Dispute Record" to dispute the payment or other transfer of value, or ownership or investment interest. You will need to provide a reasonable explanation for your dispute of the record.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record.

To return to the previous page, select "Back."

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

Physician Records

Entity Making Payment: Please Select	Record ID: Please Select	Date Of Publication: Please Select
Dispute ID: Please Select	Review and Dispute Status: <input type="checkbox"/> Initiated <input type="checkbox"/> Acknowledged <input type="checkbox"/> Resolved No Change <input type="checkbox"/> Withdrawn <input type="checkbox"/> Resolved	Payment Category: <input type="checkbox"/> General Payments <input type="checkbox"/> Research Payments <input type="checkbox"/> Ownership or Investment Interest
Affirmed (Yes/No): <input type="checkbox"/> Yes <input type="checkbox"/> No		Search Clear All

Showing Results for: [All]

Show Entries: 10

[Affirm Record](#) [Dispute Record](#) [Withdraw Dispute](#)

Select	Entity Making Payment	Record ID	Dispute ID	Payment Category	Form Of Payment or Transfer of Value	Nature Of Payment or Transfer of Value	Date of Payment	Amount(s)	Delay in Publication of Research Payment Indicator	Last Modified Date	Current Record Standing
<input type="checkbox"/>	ABCDE Medical	10054		General Payments	Cash or cash equivalent	Consulting Fee	2013-11-04	\$5,000.00	No	2014-07-02	Attested
<input checked="" type="checkbox"/>	ABCDE Medical	10056		General Payments	Cash or cash equivalent	Grant	2013-10-21	\$7,500.00	No	2014-07-02	Attested
<input type="checkbox"/>	ABCDE Medical	10055		General Payments	Cash or cash equivalent	Education	2013-12-11	\$1,500.00	No	2014-07-02	Attested

Page 1 of 1

Page 1

[Go](#)

Step 4: Enter Reason for Dispute and Select “Send Dispute”

Open Payments (Sunshine Act)

Physician [Switch User Type](#)

[Home](#) [Review and Dispute
Review, Affirm, Dispute](#) [My Profile
Account, Roles, Nominations](#) [Help](#)

Dispute Records

A field with an asterisk (*) is required.

John Doe - 2013

[Back](#)

In the “Reason for Dispute” free-form text box below, provide an explanation for disputing the record (an explanation is required). The text box can contain up to 4,000 characters, including spaces. Special characters allowed in the box are limited to apostrophes or single quotes (’), periods (.), ampersands (&), hyphens (-), and commas (,).

Select “Send Dispute” after entering reasons.

An example of a reason for initiating a dispute that should be noted in the box below: “This record is disputed because an incorrect name of the associated drug or biological name is listed and also the reported payment amount of “thirty thousand dollars” is inaccurate. It should be “three thousand dollars.”

Note: The contents of the “Reason for Dispute” box will be sent in an email to the applicable manufacturer or applicable GPO that reported the payment, other transfer of value, or ownership or investment interest. Even in the case of a record that was submitted as part of a consolidated report, the dispute is sent to the entity that made the payment, as opposed to the entity that submitted the consolidated report to the Open Payments system.

If multiple disputes are initiated at the same time across different applicable manufacturers or applicable GPOs, the same “Reason for Dispute” text will be sent to all of them.

Once the action has been confirmed by selecting “Send Dispute,” the status of the dispute will be displayed as “Initiated.”

To return to the previous page, select “Cancel.”

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

You have selected the following [1] record(s):

Record ID	Entity Making Payment	Date of Payment	Amount (\$)	Record Status	Review and Dispute Status
10056	ABCDE Medical	2013-10-21	\$7,500.00	Attested	

* Reason for Dispute:

The payment amount is incorrect. The amount received was 7,500 and needs to be updated.

4,000 characters maximum

[Cancel](#)

[Send Dispute](#)

Step 5: Dispute Confirmation

Open Payments (Sunshine Act)

Physician [Switch User Type](#)

Home

Review and Dispute

Review, Affirm, Dispute

My Profile

Account, Roles, Nominations

Help

Disputes Confirmed

John Doe - 2013

[Continue](#)

You have successfully initiated the following dispute(s).

An email has been sent to notify the reporting entity.

Date Dispute(s) Initiated: 07/02/2014 5:19 PM

Record ID	Dispute ID Assigned	Entity Making Payment
10056	181	ABCDE Medical

Reason for Dispute:

The payment amount is incorrect. The amount received was 7,500 and needs to be updated.

[Continue](#)

Open Payments (Sunshine Act)

Home	Review and Dispute Review Affirm Dispute	My Profile Account, Roles, Nominations	Help
------	---	--	------

[Back](#)

The table below contains only the records reported for the selected physician during the selected program year.

The list is organized by reporting entity, including reporting entities that reported made payments or other transfers of value to the physician, and reporting entities in which the physician has ownership or investment interests.

Only records that have been attested to by reporting entities will be displayed. Records that have not yet been attested to or are still being processed by a reporting entity will be made available for review only after attestation has been completed.

Please note: There is a horizontal scroll bar below the table, for you to use to view more columns in the table. Use the filtering tools below to customize your view of the disputed records.

To take an action related to a disputed record, select the check box in the first column of the table (next to the Entity Making Payment column). You may then perform the following actions on the selected record(s):

- Select **"Affirm Record"** to confirm the payment or other transfer of value, or ownership or investment interest.
- Select **"Dispute Record"** to dispute the payment or other transfer of value, or ownership or investment interest. You will need to provide a reasonable explanation for your dispute of the record.
- Select **"Withdraw Dispute"** to acknowledge that the physician is no longer disputing the record.

To return to the previous page, select "Back."

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

Physician Records




Entry Making Payment: Please Select		Record ID: []	Date Of Publication: Please Select
Dispute ID: []	Review and Dispute Status: <input type="checkbox"/> Initiated <input type="checkbox"/> Acknowledged <input type="checkbox"/> Resolved No Change <input type="checkbox"/> Withdrawn <input type="checkbox"/> Resolved	Payment Category: <input type="checkbox"/> General Payments <input type="checkbox"/> Research Payments <input type="checkbox"/> Ownership or Investment Interest	Affirmed (Yes/No): <input type="checkbox"/> Yes <input type="checkbox"/> No

Showing Results for: All

Show Entries 10

<div> Affirm Record Dispute Record Withdraw Dispute </div>												
	Nature Of Payment or Transfer of Value	Date of Payment	Amount(s)	Delay in Publication of Research Payment Indicator	Last Modified Date	Current Record Standing	Review and Dispute Status	Date Dispute Initiated	Dispute Last Modified By	Affirmed (Yes/No)	History Of Dispute	View Record
1	Grant	2013-10-21	\$7,500.00	No	2014-07-02	Attested	Initiated	2014-07-02	John Doe	No	View	View
1	Consulting Fee	2013-11-04	\$5,000.00	No	2014-07-02	Attested				Yes		View
1	Education	2013-12-11	\$1,500.00	No	2014-07-02	Attested				No		View

[1 <](#)
[<](#)
[Page 1 of 1](#)
[>](#)
[>1](#)
 Page [1](#)
[Go](#)

Affirm Record		Dispute Record		Withdraw Dispute	
Date Dispute Initiated 	Dispute Last Modified By 	Affirmed (Yes/No) 	History Of Dispute	View Record	
2014-07-02	John Doe	No	View	View	
		Yes		View	
		No		View	

Withdrawing Disputes

Withdrawing Disputes Overview

- Physicians and teaching hospitals can withdraw disputes
- A dispute can be withdrawn after it has been initiated or acknowledged
- The reporting entity will receive an email notification when a dispute has been withdrawn

Withdrawing Disputes Process Overview

Access the Open Payments System via the CMS Enterprise Portal and Select “Review and Dispute” Tab



Select the Teaching Hospital or Physician and Program Year



View Records and Select Records to Withdraw



Review Records Marked for Withdrawal and Select “Withdraw Disputes”

Withdrawing Disputes Instructions

Step 1: Log into the Open Payments System via the CMS Enterprise Portal

Open Payments (Sunshine Act)

Physician [Switch User Type](#)

[Home](#)

Review and Dispute

Review, Affirm, Dispute

My Profile

Account, Roles, Nominations

Help

Welcome to the Open Payments System



Access the Open Payments User Guide



Need help with the website?
[Contact Us](#) by email



Step 2: Select “Review and Dispute” Tab

Open Payments (Sunshine Act)

Physician [Switch User Type](#)

Home	Review and Dispute Review , Affirm , Dispute	My Profile Account, Roles, Nominations	Help
------	---	--	------

Review and Dispute Overview

A field with an asterisk (*) is required.

Physician Records

Select the reporting entity and program year for which records relating to payments or other transfers of value, or ownership or investment interests are disputed. Then select “Show Disputes.”

There is an initial 45-day period for physicians and teaching hospitals to review and dispute their data before it is made public. Following that initial 45 days is an additional 15-day correction period for reporting entities to work with physicians and teaching hospitals to resolve disputes.

Physicians and teaching hospitals may initiate disputes with reporting entities at any time, not just during the above-mentioned periods. Note the information below to understand how the dispute initiation and resolution timing affects public display of the data.

- Disputes initiated within the initial 45-day review and dispute period, and resolved by the end of the additional 15-day correction period, will be published and tagged as non-disputed in the September 2014 publication of the data.
- Disputes initiated within the initial 45-day review and dispute period, and NOT resolved by the end of the additional 15-day correction period, will be published and tagged as disputed in the September 2014 publication of the data.
- Disputes initiated after the 45-day review and dispute period, and resolved by the beginning of the following review period, will be published and tagged as non-disputed in both the September 2014 data publication and subsequent data publications (however, the values of the published data will be different for each of these publications, per the dispute resolution).
- Disputes initiated after the 45-day review and dispute period, and NOT resolved by the beginning of the following review period, will be published and tagged as non-disputed in the current display status (September 2014) and tagged as disputed in the upcoming data release display status.

Only records for which initial attestation was completed before the start of the review and dispute period will be considered for publication in the September 2014 publication of data.

For a complete list of detailed rules around data publication, refer to the [Open Payments User Guide](#).


* Choose a Physician:


John Doe

* Program Year:

2013

Show Records

 [Access the Open Payments User Guide](#)

 [Need help with the website?](#)
[Contact Us by email](#)

Step 3: Select Records to Withdraw Dispute

Open Payments (Sunshine Act)

Physician [Switch User Type](#)

[Home](#) [Review and Dispute
Review, Affirm, Dispute](#) [My Profile
Account, Roles, Nominations](#) [Help](#)

Review and Dispute - John Doe - 2013

[Back](#)

The table below contains only the records reported for the selected physician during the selected program year.

The list is organized by reporting entity, including reporting entities that reported made payments or other transfers of value to the physician, and reporting entities in which the physician has ownership or investment interests.

Only records that have been attested to by reporting entities will be displayed. Records that have not yet been attested to or are still being processed by a reporting entity will be made available for review only after attestation has been completed.

Please note: There is a horizontal scroll bar below the table, for you to use to view more columns in the table. Use the filtering tools below to customize your view of the disputed records.

To take an action related to a disputed record, select the check box in the first column of the table (next to the Entity Making Payment column). You may then perform the following actions on the selected record(s):

- Select "Affirm Record" to confirm the payment or other transfer of value, or ownership or investment interest.
- Select "Dispute Record" to dispute the payment or other transfer of value, or ownership or investment interest. You will need to provide a reasonable explanation for your dispute of the record.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record.

To return to the previous page, select "Back."

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

Physician Records

Entity Making Payment: Record ID: Date Of Publication:

Dispute ID: Review and Dispute Status: Payment Category: ☐ General Payments ☐ Research Payments ☐ Ownership or Investment Interest Affirmed (Yes/No): ☐ Yes ☐ No [Search](#) [Clear All](#)

Showing Results for:[All]

Show Entries

[Affirm Record](#) [Dispute Record](#) [Withdraw Dispute](#)

Select	Entity Making Payment	Record ID	Dispute ID	Payment Category	Form Of Payment or Transfer of Value	Nature Of Payment or Transfer of Value	Date of Payment	Amount(s)	Delay in Publication of Research Payment Indicator	Last Modified Date	Current Record Standing
<input checked="" type="checkbox"/>	ABCDE Medical	10050	101	General Payments	Cash or cash equivalent	Grant	2013-10-21	\$7,500.00	No	2014-07-02	Attested
<input type="checkbox"/>	ABCDE Medical	10054		General Payments	Cash or cash equivalent	Consulting Fee	2013-11-04	\$5,000.00	No	2014-07-02	Attested
<input type="checkbox"/>	ABCDE Medical	10055		General Payments	Cash or cash equivalent	Education	2013-12-11	\$1,500.00	No	2014-07-02	Attested

Page 1 of 1 [Go](#)

Step 4: Review Records and Select “Withdraw Disputes”

Open Payments (Sunshine Act)

Physician [Switch User Type](#)

[Home](#)

[Review and Dispute](#)
[Review, Affirm, Dispute](#)

[My Profile](#)
Account, Roles, Nominations

[Help](#)

Withdraw Disputes

John Doe - 2013

[Back](#)

Select "Withdraw Disputes" to confirm the withdrawal of the selected dispute(s). Once the dispute is withdrawn, the status of the dispute will be displayed as "Withdrawn".

To return to the previous page, select "Cancel."

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

You are withdrawing the following [1] dispute(s):

Dispute ID	Record ID	Date of Payment	Amount (\$)	Entity Making Payment	Review and Dispute Status	Record Status	Date Dispute Initiated
181	10056	2013-10-21	\$7,500.00	ABCDE Medical	Initiated	Attested	2014-07-02

[Cancel](#)

[Withdraw Disputes](#)

Step 5: Withdrawal Confirmation

Open Payments (Sunshine Act)

Physician [Search User Type](#)

Home

Review and Dispute
[Review](#) [Affirm](#) [Dispute](#)

My Profile
[Account](#) [Roles](#) [Nominations](#)

Help

Review and Dispute - John Doe - 2013

[Back](#)

You have successfully withdrawn the following dispute(s):

Record ID: Dispute ID:
10050 181

An email has been sent to notify the reporting entity.

The table below contains only the records reported for the selected physician during the selected program year.

The list is organized by reporting entity, including reporting entities that reported made payments or other transfers of value to the physician, and reporting entities in which the physician has ownership or investment interests.

Only records that have been attested to by reporting entities will be displayed. Records that have not yet been attested to or are still being processed by a reporting entity will be made available for review only after attestation has been completed.

Please note: There is a horizontal scroll bar below the table, for you to use to view more columns in the table. Use the filtering tools below to customize your view of the disputed records.

To take an action related to a disputed record, select the check box in the first column of the table (next to the Entity Making Payment column). You may then perform the following actions on the selected record(s):

- Select "Affirm Record" to confirm the payment or other transfer of value, or ownership or investment interest.
- Select "Dispute Record" to dispute the payment or other transfer of value, or ownership or investment interest. You will need to provide a reasonable explanation for your dispute of the record.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record.

To return to the previous page, select "Back."

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

Physician Records

Entity Making Payment:

Please Select

Record ID:

Please Select

Date Of Publication:

Please Select

Dispute ID:

Review and Dispute Status:

Initiated
Acknowledged
Resolved No Change
Withdrawn
Resolved

Payment Category:

☐ General Payments
☐ Research Payments
☐ Ownership or Investment Interest

Affirmed (Yes/No):

☐ Yes
☐ No

Search

Clear All

Showing Results for: [All]

Show Entries: 10

[Affirm Record](#)

[Dispute Record](#)

[Withdraw Dispute](#)

	Entity Making Payment or Transfer of Value	Date of Payment	Amount (\$)	Delay in Publication of Research Payment Indicator	Last Modified Date	Current Record Standing	Review and Dispute Status	Date Dispute Initiated	Dispute Last Modified By	Affirmed (Yes/No)	History Of Dispute	View Record
1	Grant	2013-10-21	\$7,500.00	No	2014-07-02	Attested	Withdrawn	2014-07-02	John Doe	No	View	View
1	Consulting Fee	2013-11-04	\$5,000.00	No	2014-07-02	Attested				Yes	View	View
1	Education	2013-12-11	\$1,500.00	No	2014-07-02	Attested				No	View	View

10

<

Page 1 of 1

>

Page 1

Go

[Affirm Record](#)

[Dispute Record](#)

[Withdraw Dispute](#)

Review and Dispute Status	Date Dispute Initiated	Dispute Last Modified By	Affirmed (Yes/No)	History Of Dispute	View Record
Withdrawn	2014-07-02	John Doe	No	View	View
			Yes	View	View
			No	View	View

Reminders for Withdrawing Disputes

- **Make sure you have:**
 - **Registered in EIDM**
 - **Successfully registered in the Open Payments system**
- Physician authorized representatives must hold the “Dispute Records” access level to withdraw disputes
- Authorized officials and authorized representatives for teaching hospitals and physicians can withdraw disputes

Dispute Resolution Process

Resolving Disputes Overview

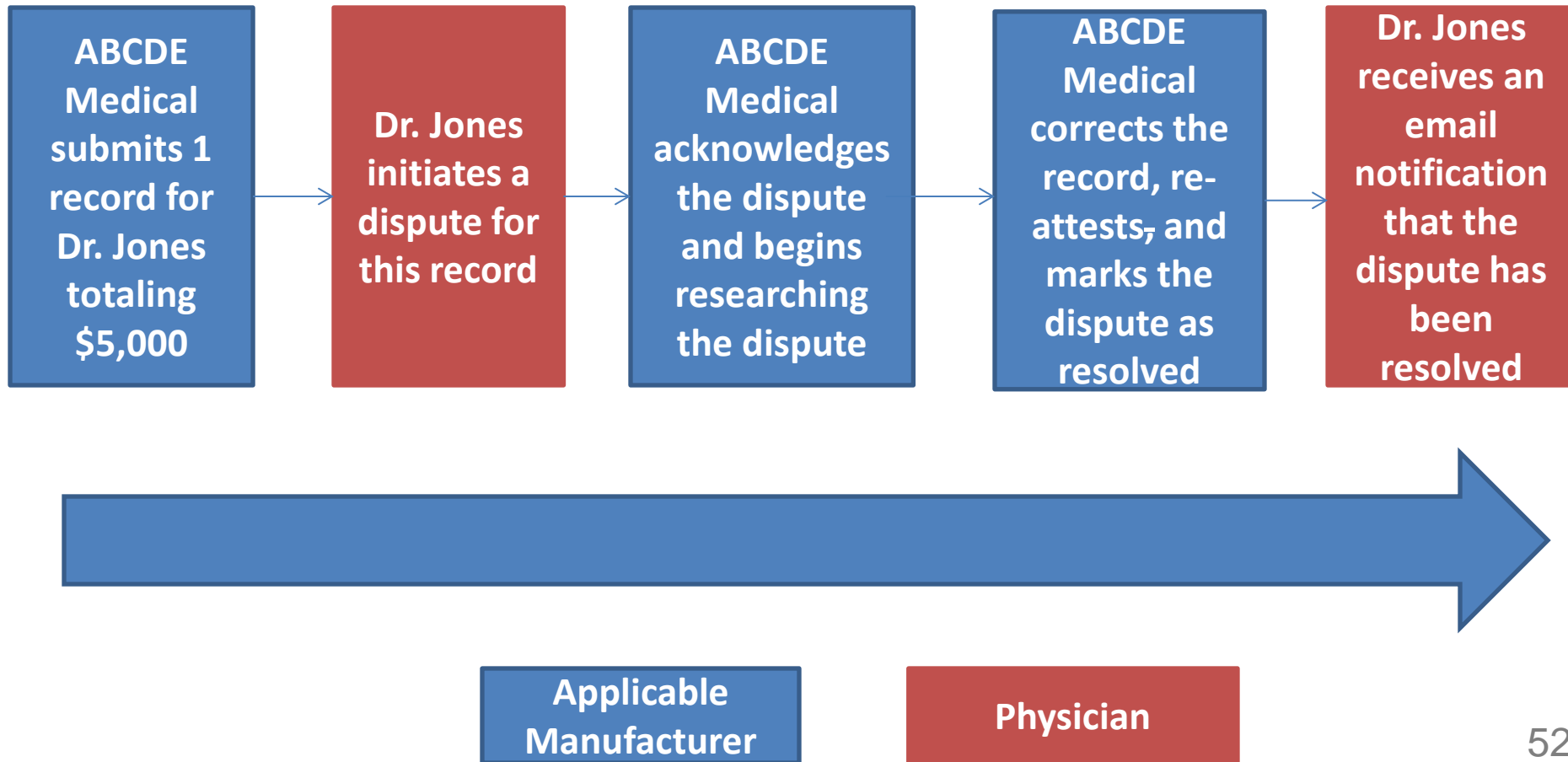
Reporting entities can resolve disputes in one of two ways:

1. The dispute can be resolved with no changes made to the disputed record
2. The dispute can be resolved with updates made to the disputed record

Resolving Disputes Overview (cont.)

- Physicians and teaching hospitals receive email notifications if a record they disputed is modified by the reporting entity or if the reporting entity identifies the dispute as resolved without having changed the record
- If the physician or teaching hospital believes that a dispute with a status of “Resolved” has not been sufficiently resolved, they may initiate another dispute on the same record
- **CMS will not mediate disputes between physicians/teaching hospitals and reporting entities**
- Reporting entities, physicians, and teaching hospitals should work outside of the Open Payments system to resolve disputes
- If a dispute is resolved by re-assigning a record to another physician or teaching hospital, the record will no longer appear in your view

Review and Dispute Scenario



Review and Dispute Impact on Data Publication

- Corrections made after the initial 60-day review and dispute period will not be reflected in the Sept. 2014 public posting
- Data corrections made by reporting entities may be made at any time and the corrections will be updated in the next publication of the data
- CMS will update data from the current and previous year at least once annually, in addition to the initial data publication that followed the data submission
- In the cases where a dispute cannot be resolved, the latest, attested-to data submitted by the reporting entity will be published and identified as under dispute

Next Steps

What You Can Do Now

- Register in EIDM and in the Open Payments system
- Begin reviewing records in the Open Payments system, and, if necessary, initiate disputes that have been reported about you or your teaching hospital
- Review available resources on the CMS Open Payments website: <http://go.cms.gov/openpayments>
- Register for the CMS listserv via the Open Payments website to receive email updates about Open Payments

General Resources Available

- CMS Open Payments website: <http://go.cms.gov/openpayments>
 - “Dispute and Resolution”: Information on the dispute and resolution process, timelines, and general guidance
 - “Events” page: Open Payments technology-focused webinar recordings and materials, plus a schedule of upcoming webinars
 - “Physician” and “Teaching Hospital” pages: Physician and Teaching Hospital focused resources
 - “Fact Sheets and User Guides” page: Link to the User Guide with comprehensive information regarding the Open Payments system functionality
- Open Payments Help Desk:
 - openpayments@cms.hhs.gov
 - 1-855-326-8366
 - Hours: Monday-Friday, 7:30 a.m.- 6:30 p.m. (CT)