Open Payments System Quick Reference Guide

Bulk File Upload

February 2015

Overview

The Open Payments system allows applicable manufacturers and applicable group purchasing organizations (GPOs) to submit payments or other transfers of value and ownership or investment interests information via bulk file uploads or manual data entry. This quick reference guide provides a high-level overview of how to submit data via bulk file upload.

Note: Before you can begin any of the following scenarios, you must successfully register in the Enterprise Identity Management (EIDM) system and receive access to the Open Payments system. Refer to the "Open Payments System Quick Reference Guide – Enterprise Identity Management (EIDM) Registration" for detailed instructions on how to complete EIDM registration.

File Formats and Types of Payments

Bulk data files for the Open Payments system must be in CSV (character-separated value) format. The field delimiter for the CSV file must be a pipe (|) for the file to be understood by the Open Payments system. Instructions on how to set the field delimiter can be found in Chapter 4 of the Open Payments User Guide.

There are three CSV sample files (referred to as "templates" in the Open Payments system) available for download, that show the way data should be formatted in a bulk data CSV file. These sample files correspond to the three payment types:

- CSV Sample File: General Payments (called "General Template CSV" in the Open Payments system) – For general payments or other transfers of value **not** made in connection with a research agreement or research protocol .

- CSV Sample File: Research Payments (called "Research Template CSV" in the Open Payments system) – For research payments or other transfers of value made in connection with a research agreement or research protocol.

- CSV Sample File: Physician Owner/Investor (called "Owner/Investor Template CSV" in the Open Payments system) – For ownership/investment information submissions.

The maximum file size for submitted files is 250 MB. Files that exceed this limit should be divided into multiple files so that each is below the 250 MB maximum. CSV data files can be zipped and submitted as ZIP files as long as all of the files contained within the ZIP file are of the same payment category type.

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Submitted ZIP files must be under 250 MB after compression. There is no limit to how many files may be uploaded into the system.

Confirm Accurate Demographic Information in Records

Prior to submitting a data file, check the demographic information for each physician or teaching hospital (for example, physician first name/last name, physician NPI, teaching hospital name, teaching hospital address, etc.) to ensure that it is as current as possible. To assist you in creating accurate records, CMS has made profile information available through the Validated Physicians List and the CMS Teaching Hospital List. The Validated Physicians List contains **only** information on physicians who have been reported on in the Open Payments system; it is **not** an exhaustive list of all physicians who should be included in Open Payments reporting. This list can only be accessed via the "Payments Overview" page within the Open Payments system. The Teaching Hospital List includes all teaching hospitals that should be included in Open Payments reporting. It can be accessed via the "Resources" page on the Open Payments website.

How to Upload a Bulk Data File

To submit data via bulk file upload, follow the steps below.

1. Log in to the Open Payments system via the CMS Enterprise Portal at https://portal.cms.gov/ and select the "Submissions" tab.

2. From the "Submissions" page, select "Bulk File Upload" under the "Data Submission" header.

3. On the "Bulk File Upload" page, select the entity, program year, and payment type.

4. Browse to select the appropriate file to upload. Each file will be treated as a separate upload. The file extension must be .CSV for CSV files and .ZIP for ZIP files.

5. Select "Upload File."

   - You may also select "Submit as Test File" in order to test the file before submission. Files submitted as test files are not uploaded. Instead, the system checks the file to ensure the file format is either CSV or ZIP.

Repeat the steps above for each file that needs to be uploaded. Upon completion of each file upload, you will receive an on-screen validation message that your files have been uploaded successfully.

Note: Performing a bulk file upload only **uploads** the data to the system. **You must complete the final submission and attestation process for the data to be considered reported.** Refer to the "Open Payments System Quick Reference Guide – Final Submission and Attestation" or the Open Payments User Guide for instructions on how to complete the data submission and attestation process.

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Processing Statuses

Once uploaded, your records will be validated for proper data field formatting and matched to a valid physician or teaching hospital. Once validation and matching has been completed for all submitted records, you will receive an email indicating if your file has been accepted into the Open Payments system as a valid submission, or if errors prevented the records from being accepted. The email will also provide next steps for locating the Error Report in the Open Payments system, which explains the nature of the errors in your file and how to correct them. Records with validation and/or matching errors must be corrected before final submission can take place.

All records must be in "Ready for Submission" status in order to proceed with final submission.

You may check the status of your upload at any time via the "Review Records" page. Below is a summary of the processing statuses related to data submission.

Table 1: Processing Statuses Related to Data Submission

Status	Definition
System Processing	Records which the Open Payments system is still processing and validating.
Matching in Progress	Records which the Open Payments system is still matching to a covered recipient physician or teaching hospital.
Ready for Submission	Records which are successfully validated and matched, and ready for final submission.

Refer to the "Open Payments System Quick Reference Guide – Final Submission and Attestation" or the Open Payments User Guide for instructions on how to complete the final data submission and attestation process.

Additional Resources

All data submission resources can be found on the "Resources" page of the CMS Open Payments website at http://www.cms.gov/OpenPayments/About/Resources.html.

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