Open Payments

Applicable Manufacturers & Applicable GPOs: Registration, Data Submission, and Attestation

CENTERS FOR MEDICARE & MEDICAID SERVICES
CENTER FOR PROGRAM INTEGRITY

OPEN PAYMENTS

CREATING PUBLIC TRANSPARENCY INTO INDUSTRY-PHYSICIAN FINANCIAL RELATIONSHIPS

January 2026

Outline

- Target Audience & Learning Objectives

- Program and System Overview

- Reporting Entity Registration and Recertification

- Data Submission & Error Correction

- Final Submission & Attestation

- Next Steps & Available Resources

Target Audience & Learning Objectives

- Target audience:

  – Applicable Manufacturers and Applicable Group Purchasing Organizations (GPOs), collectively referred to as reporting entities, who must submit data to the Open Payments system to comply with regulatory reporting requirements

- Learning objective:

  – Understand high-level instructions on how to register, submit, and attest data

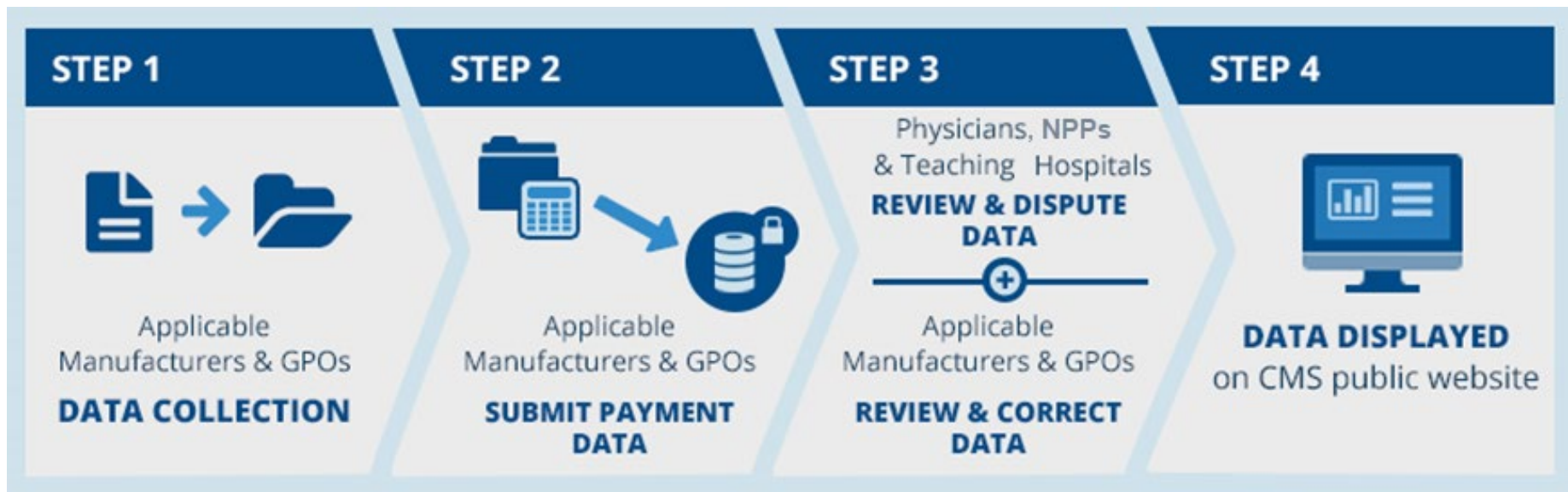 – Open Payments system enhancements

Key Terms

- **Reporting Entities** - refers to pharmaceutical and medical device manufacturers and their distributors who are required to report payments and other transfers of value to Open Payments; also referred to as Applicable Manufacturers and Applicable Group Purchasing Organizations (AM/GPOs).

- **Covered Recipients** - refers to physicians, non-physician practitioners (NPPs) and teaching hospitals receiving payments or other transfers of value from Applicable Manufacturers and Applicable Group Purchasing Organizations (AM/GPOs).

    – NPPs include Physician Assistant (PA), Nurse Practitioner (NP), Clinical Nurse Specialist (CNS), Certified Registered Nurse Anesthetist or Anesthesiologist Assistant (CRNA/AA) and Certified Nurse-Midwife (CNM).

For a complete list of key terms for Open Payments, refer to the Open Payments User Guide for Reporting Entities or Open Payments User Guide for Covered Recipients.

Program and System Overview

Open Payments Process Flow

STEP 1
Applicable Manufacturers & GPOs
DATA COLLECTION

STEP 2
Applicable Manufacturers & GPOs
SUBMIT PAYMENT DATA

STEP 3
Physicians, NPPs & Teaching Hospitals
REVIEW & DISPUTE DATA
Applicable Manufacturers & GPOs
REVIEW & CORRECT DATA

STEP 4
DATA DISPLAYED on CMS public website

Reporting entities collect payment data for a program year, which runs from January 1 to December 31
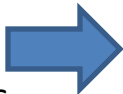
Reporting entities submit their data for the program year to the Open Payments system

Covered recipients review and, if necessary, dispute submitted data. Reporting entities resolve disputes

Program year data is published for public viewing in accordance with the publication guidelines

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Program Year 2025 Timeline

STEP 1	STEP 2	STEP 3	STEP 4
Applicable Manufacturers & GPOs **DATA COLLECTION**	Applicable Manufacturers & GPOs **SUBMIT PAYMENT DATA**	Physicians & Teaching Hospitals **REVIEW & DISPUTE DATA** + Applicable Manufacturers & GPOs **REVIEW & CORRECT DATA**	**DATA DISPLAYED** on CMS public website

2025 PROGRAM YEAR

January 1 – December 31, 2025	*February 1 – March 31, 2026**	*April 1 – May 15, 2026** *May 16 – May 30, 2026**	*On or by June 30, 2026**

Note: Review and Dispute activities begin on April 1st and continue until the end of the calendar year. The end dates provided on this slide are the cutoff dates for disputes and corrections to appear in the June data publication.
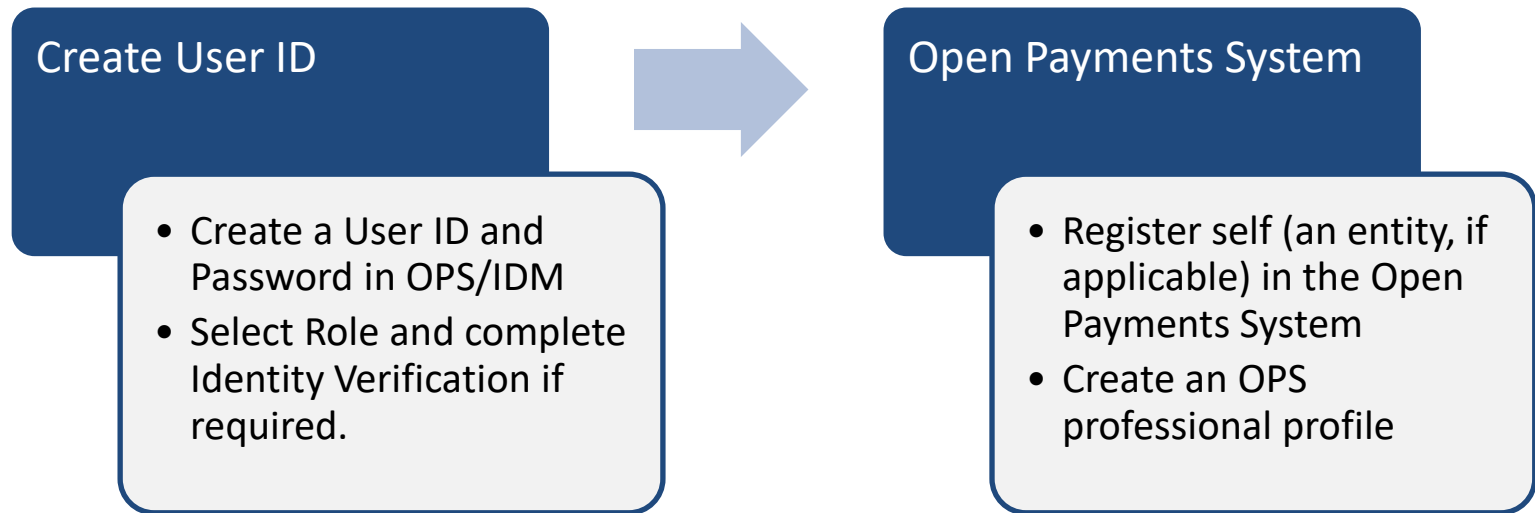
*Anticipated date

Reporting Entity Registration and Recertification

The Open Payments System

- The Open Payments System (OPS) is a secure system that is designed to support data submission activities, review, dispute and correction activities, and compliance communication.

- Users of the OPS are required to have log in credentials and are vetted upon registration.

- Users perform functions within the Open Payments system based on what is required of them by the program and their specific user roles. Most of the functions required by Open Payments will require interaction within the Open Payments System.

- Key functions of the Open Payments system for reporting entities include creating an Open Payments system profile, data submission, and correcting data as required.

Two-Step Registration Process

Create User ID

- Create a User ID and Password in OPS/IDM
- Select Role and complete Identity Verification if required.

Open Payments System

- Register self (an entity, if applicable) in the Open Payments System
- Create an OPS professional profile

1. Before registering for the Open Payments system, an individual must first create a user ID and request access to the Open Payments system. Navigate to openpayments.system.cms.gov to begin the registration process.

2. Once the individual has successfully created their User ID and logged into OPS, they can register (and if necessary, their reporting entity) with the Open Payments system.

If an individual has previously created an account in IDM and requested access to Open Payments system in the past, it is not necessary to do so again

User ID/Account Registration Overview

- Successful registration in the Open Payments System is required for everyone who wishes to access the Open Payments System and perform any system-related functions.

- Individuals requesting electronic access to CMS-protected information or systems (such as OPS) may have their identities verified, depending on their role.

- For step-by-step instructions on how to register in IDM, refer to Chapter 3 of the Open Payments User Guide for Reporting Entities.

- For returning OPS users who need help with User ID or password, select the Forgot Password and Forgot User ID links from the OPS Login page openpayments.system.cms.gov or call the Open Payments Help Desk at 1-855-326-8366 or TTY line call at 1-844-649-2766.

  - **Note: User accounts are locked after 60+ days of inactivity and deprovisioned after 2-years of inactivity. Users may call the Open Payments Help Desk with account access questions.**

Open Payments System Registration

- Once an OPS User ID is created, reporting entities must register their profile in the Open Payments System to submit, attest, correct, and view records of payments, other transfers of value, and ownership/investment interests.

- Open Payments system registration can only be completed **after** a User ID has been created.

- Reporting entities must be registered and individuals who wish to use the system on behalf of a reporting entity must also register themselves.

- The individual who registers the reporting entity will be required to register him/herself for the role of "officer".

Open Payments System Registration (cont.)

- **Registration must be completed in one session; users cannot partially save entries for completion later. Sessions time out after 30 minutes of inactivity.**

- Prepare the required information before beginning registration.

- The following fields are used to successfully vet an entity during registration or when an entity profile is modified to change the following fields:

  - Entity's Legal Name, State and Country

  - Tax Identifier Number (TIN)/Employee Identification Number (EIN)

  - Dun and Bradstreet DUNS Number (D&B) (not required, but assists in the vetting process)

- For a complete list of required information for registration refer to Chapter 3 of the Open Payments User Guide for Reporting Entities.

Entity Recertification

- Reporting entities that previously registered must complete the annual recertification process beginning January 1 of each year.

  - Recertification must be completed by an individual who holds an officer role with the reporting entity in the Open Payments system.

- Within the "Manage Entities" tab of the Open Payments System, reporting entities can indicate that they do not have any payments or transfers of value or ownership and investment interest to report for current or previous program years.

- Once recertified, entities can perform user role management activities as well as view and download previously submitted data.

- Data submission, editing, and deletion of records **cannot** be performed until the start of the submission period, and the entity is recertified.

Entity Recertification (cont.)

- Recertification confirms reporting entity details in the Open Payments system are accurate:

  – During recertification, officers can update outdated or inaccurate reporting entity information

  – Information can be updated at any time, not only during recertification

- Re-vetting of the reporting entity will occur if any of the following fields in the entity's profile change:

  – Entity's Legal Name, State and Country

  – Tax Identifier Number (TIN)/Employee Identification Number (EIN)

  – Dun and Bradstreet DUNS Number (D&B)

- Section 3.5 of the Open Payments User Guide for Reporting Entities provides additional guidance on the recertification process.

Vetting

- Vetting verifies that the applicable manufacturer or applicable GPO is a valid reporting entity:

- To ensure successful vetting, provide as much accurate information as possible during registration.

- The system will vet the reporting entity when:

    - The reporting entity's registration is submitted in the Open Payments system

    - a previously registered entity's name, state, country, TIN/EIN, or DUNS number is changed in the entity's profile.

- All the officer(s), primary and backup point of contacts who are affiliated with the entity will receive an email confirming vetting success or failure.

    - If vetting is successful, the officer(s) may begin performing actions in the system for the reporting entity.

    - If vetting fails, update the entity information and re-submit for vetting or contact the Open Payments Help Desk for assistance.

Vetting (cont.)

- Vetting status is available on the affiliated user's Open Payments home page until the entity is vetted successfully; once successfully vetted, an entity's vetting status is given on the "Manage Entities" page.

- **A reporting entity cannot take any system actions until it successfully vetted.**

- Entities with foreign addresses must request the Open Payments Foreign User role in IDM, then wait for a message from the Open Payments Help Desk.

  - The Open Payments system allows reporting entity nominees to register with foreign addresses while registering or accepting nomination.

- If the vetting status remains in "Vetting in Progress" for 48 hours or more, users can call the Open Payments Help Desk for resolution.

- Refer to Section 3.7 of the Open Payments User Guide for Reporting Entities for more information on vetting.

Data Submission & Error Correction

Data Submission Process

- **During the Calendar Year 2026 data submission period, reporting entities are required to submit data regarding payments and other transfers of value made to covered recipients, and ownership or investment interests, for Program Year 2025 (January 1 - December 31, 2025), as well as any unreported payments from eligible prior years.**

- Submitted data from prior years may also be edited.

- Data can be submitted to the Open Payments system in two ways:

  - Bulk file upload using either character-separated values (CSV) files or a ZIP file containing CSV files.

  - Manual data entry of each data record through the Open Payment system's Graphic User Interface.

- Archived Program Years 2013 - 2018 may not be submitted or edited.

- Closed Program Years may not be submitted or edited.

Data Submission Process (cont.)

- Reporting entities may choose to use either or both submission methods to report transactions.

- CMS encourages reporting entities with a smaller volume of records to use manual data entry, as preparing CSV files requires data handling expertise and may require additional software tools to prepare the files.

- The system checks each record for validation and matching errors.

- **All errors in the record must be corrected before final submission and attestation can occur.**

Data Submission Process (cont.)

- Submitters receive notifications via onscreen messages or emails at various stages of the upload and submission process. These -notify the submitter of the success or failure of their submissions and note the existence of any matching or validation errors.

- The role of the submitter can be delegated to a third-party company within the Open Payments system to submit on behalf of a reporting entity.

- Refer to Chapter 4 of the Open Payments User Guide for Reporting Entities for more information on data submission.

Data Submission Process Flow

STEP 1	STEP 2	STEP 3	STEP 4	STEP 5
Log into Open Payments System	Upload Data	Data Validation & Matching	Final Submission	Attestation

STEP 1

Submitter logs into Open Payments System

STEP 2

Bulk File Upload:
- Accepted file formats include CSV or ZIP files containing CSV files
- Files may not exceed 250MB in size
- Use the correct template for desired program year and payment type

Manual Data Entry using Graphic User Interface (GUI)

STEP 3

System performs data validation & matching:
- For bulk file upload, system notifies failure or success via email
- For manual data entry, validation checks are in real time and displayed on user interface; matching checks are performed after upload and displayed on Record ID pages of records

STEP 4

- A submitter can perform Final Submission if there are any records in "Ready for Submission" status and there are no records in "System Processing" status.
- When the submitter selects the "Notify Attester" button, a notification that records are available to attest will be sent to the Attester.

STEP 5

- Attester receives an email notification that records are in "Ready for Attestation" status
- Attester attests to the accuracy, completeness, and timeliness of the data
- Attestation is conducted for all records for that program year, across all three payment types

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Bulk File Upload

- Reporting entities with large volumes of data to report will likely want to upload bulk data files.

- The two acceptable file formats for bulk data upload are:
  - CSV (Character-Separated Values) that use pipes (|) as field delimiters
    - Sample files, also referred to as templates, are available on the Resources page of the Open Payments website and within the Open Payments System for submitters. Files must be prepared using the correct template for the program year.
  - ZIP (must contain only pipe-delimited CSV files)

- Each file can contain only one payment type: general payments, research payments, or ownership and investment interests.

- Maximum file size accepted, for both CSV and ZIP files, is 250 MB. There is no limit to how many files that may be uploaded into the system.

Bulk File Upload (cont.)

- In addition to adding new records to the system and resubmitting previously submitted records, the bulk file upload process can be used to:

  - Delete existing records from the Open Payments system

  - Update the delay in publication status of existing records in the Open Payments system

- The purpose of a record (New, Resubmission, Delete, Update Delay) is communicated via the Resubmission File Indicator field.

  - A bulk file can contain records for only one purpose (i.e., all records in a file must have the same indicator in the "Resubmission File Indicator" field).

- The "Review File Status" page allows the submitters to view the status of the submitted files and select File ID hyperlink to view error log, warning log or delete file from "File Details Page".

- Refer to Section 4.4 of the Open Payments User Guide for Reporting Entities for more information on bulk file uploading.

Manual Data Entry

- Manual data entry is completed via the Graphical User Interface (GUI).

- Manual entry can be used in conjunction with bulk data file uploads.

- Reporting entity submitters can copy/duplicate payment details across multiple program years through the User Interface (UI). This reduces the effort of entering the same data repeatedly.

- Refer to Section 4.5 of the Open Payments User Guide for Reporting Entities additional guidance on completing manual data submission.

Validation and Matching Errors

- After records are uploaded, the Open Payments system will validate and match the data.

- This may uncover errors that must be corrected for the records to be submitted successfully.

- Users can view matching errors and/or warnings on the Record ID window, error and warning logs, and while editing a record.

- There are three basic types of errors for data submitted to the Open Payments system:

  1. File validation errors

  2. Record validation errors/warnings

  3. Data matching errors

File Validation Errors

1. **File Validation Errors:** Applies only to records submitted via bulk file upload. The system will fail a file's upload if validation errors are detected. Common file errors may include:

    –   Submitted file size is larger than 250 MB

    –   File is not in CSV or ZIP format

    –   File is missing a header row and/or columns, or has incorrect number of columns

    –   Payment category of the sample file used to create the submitted file and payment category selected when uploading the file do not match

    –   Resubmission File Indicator does not correspond with the selection on the user interface

    See Section 4.7 of the Open Payments User Guide for Reporting Entities for a discussion regarding validation errors.

Record Validation Errors/ Warnings

2. **Record Validation Errors/ Warnings:** The system will fail a record if the information in the record does not match the accepted system formatting.

   – Record formatting is explained in detail in the Submission Data Mapping Document available on the Resources page of the Open Payments website.

   – Manually entered records undergo formatting checks during data entry.

   – Records submitted via bulk file upload undergo checks as part of the file submission process.

   – Common validation errors/warnings include:

     • Invalid characters in the data element

     • Required data element left blank

     • Too many or too few characters in the data element

     • Invalid value in the data element

     • Data element value does not match the CMS approved data set

     • NOTE: Records can be submitted successfully with a warning provided there are no other errors on the record.

Data Matching Errors

3. **Data Matching Errors:** A record will fail matching if the covered recipient information cannot be matched to a valid covered recipient using existing CMS resources and information.

   Examples of data matching errors include:

   – The Teaching Hospital Name in a record does not match the value for the corresponding Hospital Name in the CMS Teaching Hospital List.

   – The Teaching Hospital Address in a record does not match the value for the corresponding Teaching Hospital NPPES (National Plan & Provider Enumeration System) Business Address in the CMS Teaching Hospital List.

   – The Physician or Non-Physician Practitioner Name in a record does not match the information in validation sources used by Open Payments.

   – The Physician/Non-Physician Practitioner or Principal Investigator license in a record is not active throughout the Open Payments Program as per validation sources used by Open Payments.

Error Notifications

- **Errors in records submitted via bulk file** are communicated to submitters via email.

  - Errors in File Validation are detailed in the notification email

  - Errors in Record Validation and Matching are detailed in a downloadable error log.

  - In the error log file, the column "Data Element Value" displays the invalid value

- **Errors in records submitted via manual data entry** are communicated through two methods.

  - Errors/warnings at the Record Validation level are communicated during the record entry process through onscreen error messages.

  - Errors/warnings at the Matching level are identified within the Open Payments system and can be found on the record "Overview" page or by searching records with a "Failed Matching" status.

Error Notifications (cont.)

- Error logs contain error codes that identify the reason for record failure; error codes are explained in the "Error and Warning Code Key," available on the Resources page of the Open Payments website.

- Submission errors must be corrected, and the records re-submitted for records to be successfully submitted.

- Refer to Section 4.7 and 4.8 of the Reporting Entities User Guide for additional guidance on how to address the error notifications.

  - Open Payments validates drug and medical device information against the CMS approved datasets that are provided annually by the U.S. Food & Drug Administration (FDA). Refer to the full dataset reference files and corresponding instruction documents for additional guidance on how to address these specific errors.

Warning Notifications

- Records containing physician licenses that were valid after August 1, 2013 or NPP licenses valid after January 1, 2021, but were expired during the entirety of the program year of the record will not fail matching due to the expired licenses; however, they will trigger warnings to the user.

- Records submitted with warnings will be flagged with a warning icon on the "Record ID" column of the payment category page. The warning will also appear on the individual record's "Record ID" page.

- If the record(s) were submitted via bulk file, the "Review File Status" page will display the uploaded file with status "Processed with Warning". This status is also displayed on the bulk file's "File ID" page and the warning log for the bulk file that contains expired license warnings for each relevant record, with the specific expired license(s) specified or the Medical Device or Medical Supply Name and Primary Device Identifier combination.

Warning Notifications (cont.)

- Submitters should review the license information on records that triggered warnings.

  - If the information is valid, no action is required, and the record can continue through final submission without further updates.

  - If the information is not valid, correct or delete the records.

- Warning logs contain warning codes that identify the reason for record warnings; warning codes are explained in the "Error and Warning Code Key," available on the Resources page of the Open Payments website.

- Refer to Section 4.8 of the Open Payments User Guide for Reporting Entities for additional guidance on how to address warnings.

- If you believe that your records incorrectly failed validation and should be reported, CMS recommends contacting the help desk for assistance.

Final Submission & Attestation

Final Data Submission

- All records uploaded to the Open Payments system must go through a final data submission and attestation to be considered reported.

- All records in a payment category for a program year go through final submission simultaneously regardless of how they were submitted.

  - Final submission may take several hours depending upon the size of the submission. The submitter will receive an automated email notifying them that the final submission was successfully processed.

- Utilize the "Notify Attester" button to send an email to the attester that the records are ready for attestation or re-attestation.

  - The "Notify Attester" button will only be enabled if all records are in "Attested" or "Ready for Attestation" status.

Attestation

- Attestation legally affirms and certifies that information submitted is accurate and complete.

    - Only users holding the role of Attester may attest.

- Attesters will receive email notifications when there are records in "Ready for Attestation" status and the "Notify Attester" button is selected.

- Attestation may be completed after all errors are corrected, matching is successful, records have undergone final submission, and all records for the program year are in "Ready for Attestation" status.

- Within the Open Payments system, entity officers may attest to having no payments to report during the program year by visiting the "Manage Entities" tab in the Open Payments System.

Attestation (cont.)

- Re-attestation is required when any previously attested data is changed, including any data fields, delay in publication indicator, or when a record that was in attested status is deleted.

- Attestation must be done for **all** records submitted for a program year, **not** individual records, file submissions, or payment types.

- For the submission to be considered "on time", attestation must be completed by the reporting deadline for the program year. Data submissions that are not attested to by the reporting deadline will be considered late and may be subject to civil monetary penalties.

Assumptions Statement

- Attesters can provide an assumptions statement during the attestation process.

- Assumptions explain the reasonable assumptions made and methodologies used when reporting payments, other transfers of value, or ownership or investment interests.

- Assumptions are documented in a free-form text field during the attestation process.

- Assumptions may be a maximum of 8,000 characters (including spaces).

- Assumptions can be edited later.

- Refer to Section 4.15 of the Open Payments User Guide for Reporting Entities for additional guidance on the attestation process.

Delay in Publication

- Reporting entities can request a one-year delay in publication for eligible payment records, as well as request a renewal of the delay after a previous one expires.

  - **Records may only be delayed from publication up to four years from the date of payment.**

  - Records attributed to an archived Program are no longer eligible for a delay in publication.

- Eligible payment records may be delayed for publication if the payment or other transfer of value is related to:

  - Research or development of a new drug, device, biological, or medical supply;

  - Research or development of a new application of an existing drug, device, biological, or medical supply; or

  - Clinical investigations regarding a new drug, device, biological, or medical supply.

- The request for a delay must be renewed each year via bulk file upload or manual editing of records via graphic user interface; if a request is not renewed each year by the end of the data submission period, the record will be eligible for publication in the current publication cycle.

Delay in Publication - Delay Limits

- Open Payments updates the "Delay in Publication Indicator" status of all records each January based upon the records' age and prior delay status.

  – Records that did not have a delay requested in the previous year will remain in a "No Delay Requested" status.

  – Records that had a delay requested in the previous year and have not reached the renewal limit will be updated to a "Pending Renewal" status.

  – Records that had a delay requested in the previous year and have reached the renewal limit will be updated to a "Limit Reached" status.

- After renewing any requests for delays in publication, all records for that program year must be re-attested to for the request for delay to be confirmed.

- Refer to Section 4.12 of the Open Payments User Guide for Reporting Entities for additional guidance on the delay in publication process.

Next Steps and Available Resources

Next Steps

New Reporting Entities

- Create a Login and password and select the appropriate role in the Open Payments system

- Register self and reporting entity
(if applicable) in the Open Payments system

- Assign user roles

Returning Reporting Entities

- Ensure your User ID account has not been deactivated due to inactivity and reset password if necessary

- Recertify reporting entity information and provide required review and dispute contact information

- Confirm user roles

Covered Recipient Validation Resources

- Resources to help reporting entities ensure accurate data submission include:

  - Validated Physician List - Accessed through the Open Payments system on the "Submissions" page.

    - The Validated Physicians List (VPL) contains two separate files; one includes physicians with NPIs, and the other includes physicians without an NPI. The VPL contains information on physicians that had data reported in the past.

      - Includes supplemental file for each program year that lists physicians with at least one inactive license for that program year.

    - The VPL is **not** an exhaustive list of all physicians who should be included in Open Payments reporting. Payments to physicians are still required if the physician is not on the VPL.

Covered Recipient Validation Resources

- Resources to help reporting entities ensure accurate data submission include:

  – Validated Non-Physician Practitioners List - Accessed through the Open Payments system on the "Submissions" page.

    - The Validated Non-Physician Practitioners List (VNPPL) contains two separate files; one includes NPPs with NPIs, and the other includes NPPs without an NPI. The VNPPL contains information on NPPs that have had data reported in the past.

      – Includes supplemental file for each applicable program year that lists NPPs with at least one inactive license for that program year.

    - The VNPPL is **not** an exhaustive list of all Non-Physician Practitioners who should be included in Open Payments reporting. Payments to NPPs are still required if the NPP is not on the VNPPL.

Covered Recipient Validation Resources

- Resources to help reporting entities ensure accurate data submission include:

  - Teaching Hospital Lists

    - The Teaching Hospital List is available on the Open Payments Resources Page for Reporting Entities.

    - Teaching Hospital Lists for previous program years are available for records that need to be created or edited and can be found on the Resources page of the Open Payments website.

    - Submissions should be made using the hospital's "doing business as" name instead of legal name.

Available Resources

- Review available resources on the CMS Open Payments Resources page at https://www.cms.gov/priorities/key-initiatives/open-payments/resources/reporting-entities:

  - Open Payments User Guide for Reporting Entities

  - Tutorials

  - Error and Warning Code Key

  - Reporting Templates

  - Submission Data Mapping Document

Available Resources

- Register for CMS email notifications via the Open Payments website to receive email updates about Open Payments.

- For additional questions, contact the Open Payments Help Desk

  – Email: openpayments@cms.hhs.gov

  – Phone: 1-855-326-8366 or 1-844-649-2766 (TTY line)

Disclosure

- **Disclaimer:** The contents of this document do not have the force and effect of law and are not meant to bind the public in any way, unless specifically incorporated into a contract. This document is intended only to provide clarity to the public regarding existing requirements under the law.

- **Activities/persons addressed by this document:** Guidance for Applicable Manufacturers and Applicable Group Purchasing Organizations who must submit data to the Open Payments system to comply with regulatory and reporting requirements.

- **Date of document issuance:** January 2026

- **Replacement / Revision Status:** Revision to previous version

- **Agency Identifier:** OHEI TDG 4779

- **Summary of Document:** An overview of the Open Payments registration, data submission, and attestation process for applicable manufacturers and GPOs.

- **Citation to statutory provision / regulation applicable to this document:**
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  - **Rule citation:** 42 C.F.R. §403.900-14