

Open Payments System Quick Reference Guide

Nominating a Physician or Non-Physician Practitioner Authorized Representative and Accepting/Rejecting Nominations

Overview

This guide provides an overview of the access levels available for Physician or Non-Physician Practitioner (NPP) Authorized Representatives, how to nominate an individual to serve as an authorized representative, and how individuals can accept or reject a nomination to be an authorized representative.

Prerequisites

- Physician or NPP is registered in the Centers for Medicare & Medicaid Services (CMS) Identity Management system (IDM) and obtained access to the Open Payments system.
- Physician or NPP has a profile in the Open Payments system.

Actions

Physician or NPP Authorized Representative Role

A physician or NPP may have only **one** authorized representative who can perform certain actions on their behalf in the Open Payments system. The physician or NPP must nominate the individual for the role; individuals cannot nominate themselves for the role of authorized representative.

When nominating the individual, the physician or NPP will designate the level(s) of access the authorized representative will have. More than one level can be granted to the representative.

The access levels are:

- **Read:** ability to see physician's or NPP's profile and records information (default access level).
- **Modify Profile:** ability to edit or enter the physician's or NPP's "My Profile" information (National Provider Identifier (NPI), license, specialties, etc.).
- **Affirm and Dispute Records:** ability to affirm and dispute reported payments or other transfers of value, and ownership or investment interests.

The levels of access are not cumulative. For example, possessing "Dispute Records" access does not provide "Modify Profile" access, or vice versa.

Nominating a Physician or NPP Authorized Representative

If you are a physician or NPP, you can nominate an authorized representative during or after your initial registration.

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To nominate an authorized representative during registration, refer to the quick reference guide “Physician or Non-Physician Practitioner (NPPs) Registration” available on the Resources page of the Open Payments website (<https://www.cms.gov/priorities/key-initiatives/open-payments/resources>).

To nominate an authorized representative **after** registration has been completed, follow these steps:

1. Log in to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov> and select the “My Profile” tab.
2. Select the “My Profile Details” tab. Select the “Update Profile” button.
3. Select “Yes, designate an authorized representative.” The fields required to nominate an authorized representative will appear on the screen.
4. Enter information on the nominee for all required fields. Select the level(s) of access you want the authorized representative to have. The default level of access is “Read.” To allow additional levels, select “Modify Profile” and/or “Dispute Records.”
5. When done, select the “Save Updates” button.

The nominee will receive an email notification with instructions to log into the Open Payments system and either accept or reject the nomination. The nominee will have 10 calendar days to accept or reject the nomination. If no action is taken by the tenth calendar day, the nomination will automatically expire and will have to be reinitiated if you wish to have an authorized representative.

Accepting or Rejecting an Authorized Representative Nomination

If you have been nominated for the role of a physician’s or NPP’s authorized representative, you will receive an email notification. The notification contains a Nomination ID, which is needed to accept or reject the nomination. You have 10 calendar days to accept or reject a nomination, after which the nomination request will become inactive.

1. Log in to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov>.
 - a) If you are a first-time system user, select the “Create My Profile” button. Select the “Start Profile” button at the bottom of the screen. Select the “I have a Nomination ID and/or a Registration ID” link on the “Select Profile Type” page.
 - b) If you are a returning user, select the “My Profile” tab. Select the “My Roles and Nominations” tab, then select the “Accept/Reject Nominations” button.
2. If you are a first-time system user, select the user type “Physician or Non-Physician Practitioner” from the drop-down list and enter the nomination ID (this user type will be prepopulated for returning users).
3. Select the “Show Nomination” button and review the information. If the information is correct, select the “Continue” button.

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4. If the information is incorrect, select the “Cancel” button to end the profile creation process. Contact the physician or NPP who nominated you directly and inform them of any inaccuracies so they may be corrected.
5. On the “Confirm Covered Recipient Information” page, review the information displayed and ensure that this is the physician or NPP for whom you want to accept the user role nomination. Select the “Continue” button to proceed.

Note: If it is not the correct physician or NPP, either select the “Back” button at the bottom of the page to return to the previous page to correct the information you have entered or select “Cancel” to end the acceptance process.

6. Select “Yes, I accept the role of Authorized Representative” to accept the role or “No, I do not accept” to reject the role. If you do not accept, the process ends and you will not be able to perform any activities for that physician or NPP in the Open Payments system.
7. Enter your personal information and select the “Continue” button.
8. Review the information entered. To correct errors, select the “Back” button to return to previous pages and make your corrections. If the information is correct, select the “Submit” button.

Note:

- If you currently have an authorized representative role for the physician and the physician deactivates the role, you will receive an email notification stating, “Authorized Representative Deactivation by the Physician in the Open Payments System”. After the deactivation you will no longer be able to access the physician details or take any actions on behalf of the physician within the Open payments System.
- If you currently have an authorized representative role for the NPP and the NPP deactivates the role, you will receive an email notification stating, “Authorized Representative Deactivation by the Non-Physician Practitioner in the Open Payments System”. After the deactivation you will no longer be able to access the NPP details or take any actions on behalf of the NPP within the Open payments System.

Next Steps

- Perform system related activities on behalf of your nominating physician/NPP.

Additional Resources

Supporting resources are available on the Resources page of the Open Payments website at <https://www.cms.gov/priorities/key-initiatives/open-payments/resources> .

The “Physician, Non-Physician Practitioner and Teaching Hospital Registration” section of the Open Payments User Guide for Covered Recipients covers the registration processes in detail and provides step-by-step instructions for various scenarios.

Quick reference guides relevant to nominating, accepting, and rejecting nominations, and your next steps include:

- Physician or Non-Physician Practitioner (NPP) Profile Creation
- Covered Recipient Review and Dispute Process

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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.
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