



# *Open Payments*

## *Covered Recipients Registration*

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

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C R E A T I N G P U B L I C T R A N S P A R E N C Y  
I N T O I N D U S T R Y - P H Y S I C I A N  
F I N A N C I A L R E L A T I O N S H I P S

**January 2024**

*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.*

# Outline

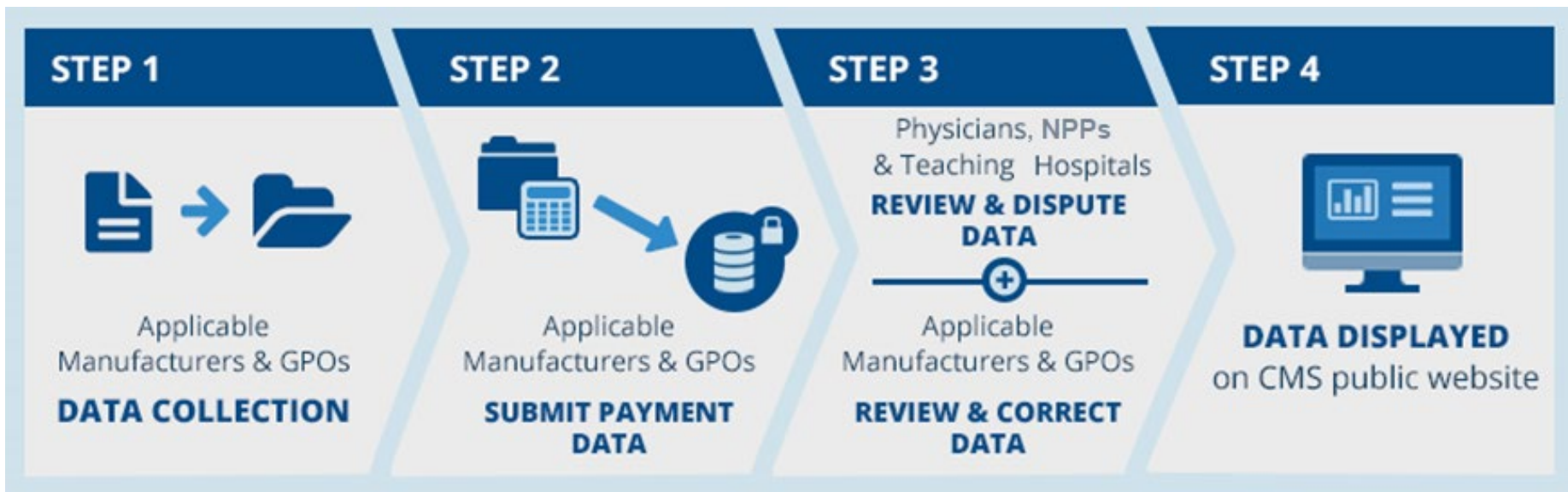
- Target Audience and Learning Objectives
- Open Payments Program and System Overview
- Physician/ Non-Physician Practitioner (NPP) Registration in the Open Payments System
- Teaching Hospital Registration in the Open Payments System
- Next Steps and Available Resources

# Target Audience & Learning Objectives

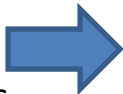
- Target audience:
  - Physicians, Non-Physician Practitioners (NPPs) and teaching hospitals (collectively referred to as “covered recipients”) who want to view and possibly dispute information submitted about them in the Open Payments system regarding payments, other transfers of value, or physician ownership or investment interests from Applicable Manufacturers or Applicable Group Purchasing organizations (GPOs), collectively referred to as “Reporting entities”
- Learning objectives:
  - Understand the Open Payments registration process
  - Physicians/NPPs: Understand how to register and how to nominate a representative to perform system actions on your behalf
  - Teaching hospitals: Understand registration, as well as system user roles and how to assign them

# Open Payments Program and System Overview

# Open Payments Process Flow



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



Data for that program year is published for public viewing in accordance with the publication guidelines

# Program Year 2023 Timeline



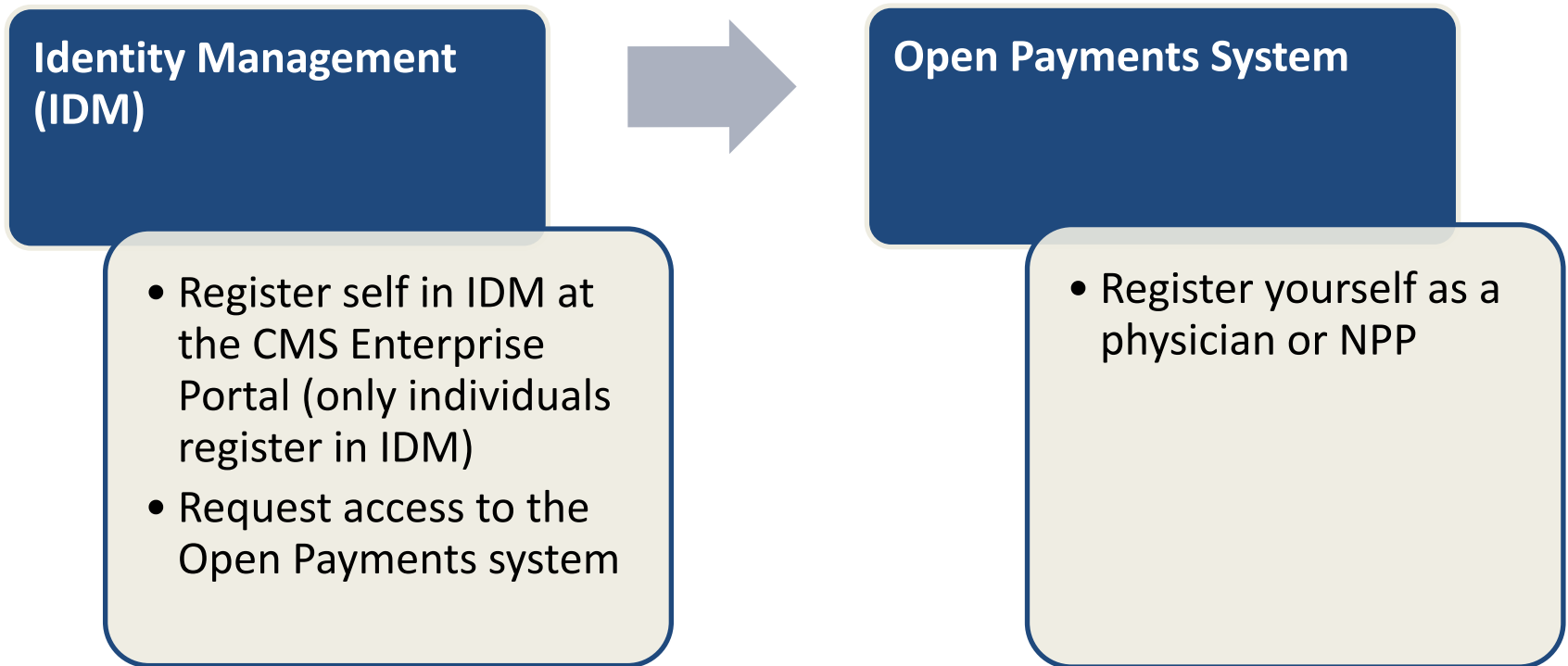
Note: Review and Dispute activities start on April 1<sup>st</sup> and can continue until end of the calendar year. The end dates provided on this slide are the cutoff for disputes and corrections to appear in the June 2024 data publication.

**\*Anticipated date**

# Purpose of Registration

- Registration is required for a covered recipient to be able to review and dispute payment records prior to their publication
- Registration may be done at any time
- Records submitted by reporting entities will be available for review and dispute beginning in April 2024 and will be eligible for review through the end of the calendar year (December 31, 2024)
- **A 45-day Pre-publication Review and Dispute period will begin in April 2024. Covered recipients have an opportunity to review and dispute any records during this time before records are published in initial publication.**
- Disputes, or changes resulting from disputes initiated after the 45-day review and dispute period will be reflected in subsequent data publications
- CMS does **not** mediate dispute resolutions between reporting entities and covered recipients.
- For additional information on the review and dispute process, refer to the quick reference guide “Covered Recipients Review and Dispute Process” and the Open Payments User Guide for Covered Recipients

# Two-Step Registration Process for Physicians and NPPs

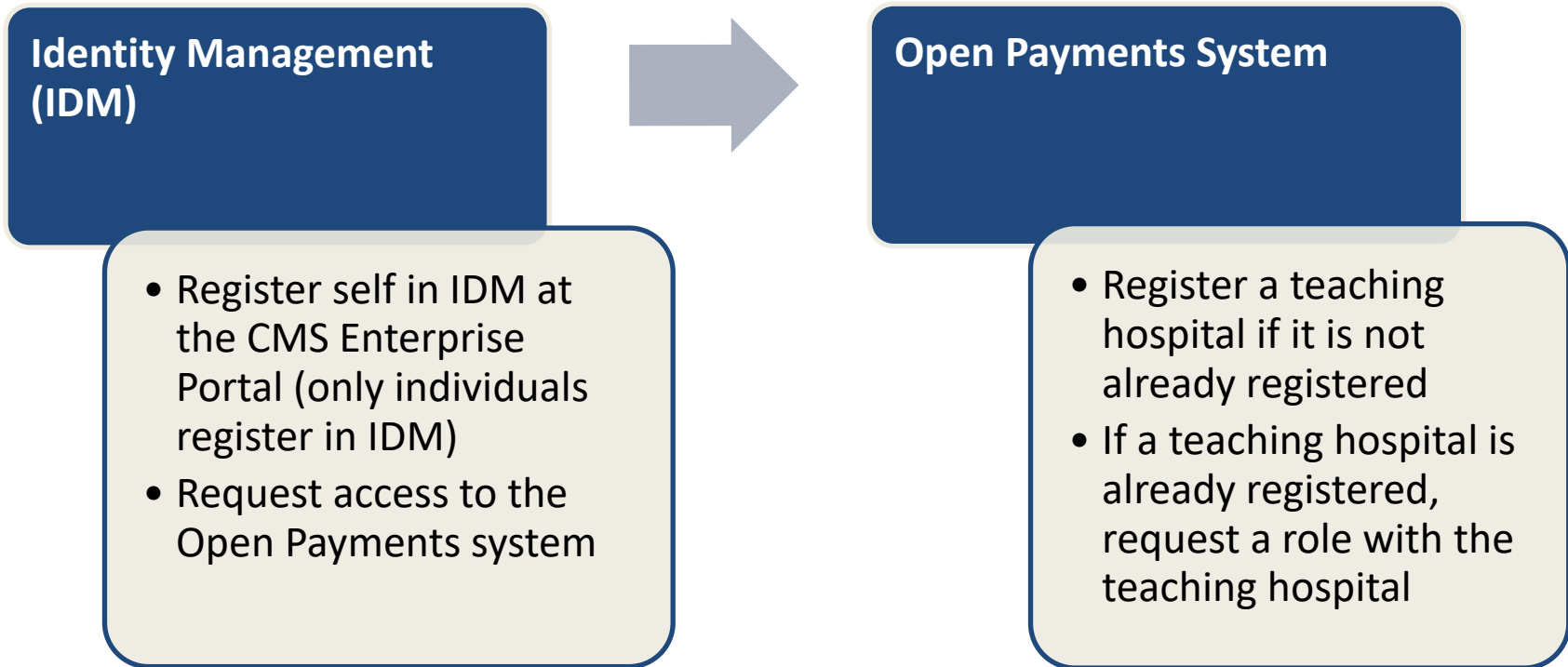


The CMS Enterprise Portal is located at <https://portal.cms.gov>

If you registered in Identity Management and requested access to Open Payments last year, it is not necessary to do so again.



# Two-Step Registration Process for Teaching Hospitals



Note: Hospital-based physicians must register as physicians, unless they are reviewing and disputing records on behalf of the teaching hospital. Users registering as teaching hospital users must be appropriately authorized by the hospital administration to review and dispute payments made to the hospital.

The CMS Enterprise Portal is located at <https://portal.cms.gov>

**If you registered in Identity Management and requested access to Open Payments last year, it is not necessary to do so again.**

# IDM Overview

- Successful registration in both IDM and the Open Payments system is required for each individual who wishes to access the Open Payments system
- Individuals who request electronic access to CMS-protected information or systems (such as IDM) must first have their identities verified
  - Identity verification is the process of providing information (e.g., identity history, credentials, or documents) to prove that a person is the same person he or she claims to be
- For step-by-step instructions on how to register in IDM, refer to the quick reference guide “Identity Management System (IDM) Registration”
- IDM will lock a user account after 60+ days of inactivity; IDM will deactivate a user account after 180+ days of inactivity
- For returning IDM users who need help with User ID, password visit <https://portal.cms.gov> or contact the Open Payments Help Desk at 1-855-326-8366 or 1-844-649-2766 (TTY line)
- For account deactivations, contact the Open Payments Help Desk at 1-855-326-8366 or 1-844-649-2766 (TTY line)

# Physician and NPP Registration in the Open Payments System

# Physician/NPP Registration in Open Payments System

- Physicians and NPPs must be registered in IDM and the Open Payments system in order to participate in review and dispute activities
- Hospital-based physicians/NPPs must register as physicians/NPPs if they wish to review and dispute records associated with as physicians/NPPs
- A physician/NPP may nominate one authorized representative to access the system on their behalf
- Physicians/NPPs who serve as principal investigators on any industry-funded research study may be reported as principal investigators associated with research payments; such physicians/NPPs should register in the physician/NPP role to be able to review and, if necessary, dispute their association with any research payments reported by the industry

# Physician/NPP Registration in Open Payments System (cont.)

- Make sure the name used for registration matches exactly with the name in the National Plan and Provider Enumeration System (NPPES), if applicable
- Enter the National Provider Identifier (NPI), if applicable, exactly as listed in NPPES for the current calendar year and enter at least one active state license
- Physicians/NPPs and their Authorized Representatives can use foreign address during registration within the Open Payments system
  - User may register with foreign address by selecting "Country" field drop down value other than "United States"
- Quick reference guides "Physician and NPP Registration" and "Nominating a Physician or NPP Authorized Representative and Accepting/Rejecting Nominations" provide additional guidance

# Physician/NPP Vetting

- Physicians/NPPs are vetted using information supplied during Open Payments system registration, including:
  - First and last name
  - National Provider Identifier (NPI)
  - State license(s) information
  - Primary type (if no NPI is provided)
- Physicians/NPPs will receive an email confirming vetting success or failure
- Provide as much information as possible – more information can speed vetting and ensure all records associated with the physicians/NPPs will be accurately matched to them
- Successful vetting is required for the physicians/NPPs to perform any actions within the Open Payments system
- Physicians/NPPs cannot edit their first name, last name, or NPI after vetting is successful; they must contact the Open Payments Help Desk to edit this information
- If vetting is unsuccessful, physicians/ NPPs should contact the Open Payments Help Desk for assistance 1-855-326-8366 or 1-844-649-2766 TTY line

# Teaching Hospital Registration in the Open Payments System

# Teaching Hospital Registration in Open Payments System

- Only teaching hospitals listed on the CMS Open Payments teaching hospital lists can register in the Open Payments system
  - Teaching hospital lists for individual program years are available on the Resources page of the Open Payments website
- Teaching hospitals must register using the hospital's "doing business as" (DBA) name
  - DBA name is listed in the "Hospital Name" field in the teaching hospital list
- Teaching hospitals not on the current program year list, but found on a prior year's teaching hospital list, can register for that prior program year



# Teaching Hospital Registration (cont.)

- Teaching hospital users can hold one of two user roles: Authorized official and/or Authorized representative
- Individuals may nominate themselves or be nominated for one of these roles
- Teaching hospitals can have up to 10 individuals associated with them in the Open Payments system, up to five of whom may be authorized officials
- Refer to the quick reference guides “Teaching Hospital Registration” and “Teaching Hospital User Roles and Nominations” for additional guidance

# Teaching Hospital User Roles and Nominations

User Role	Function
Authorized Official	<ul style="list-style-type: none"><li>• Registers the teaching hospital in the Open Payments system</li><li>• Approves or modifies nominations and requests for user roles made by others, including self-nominations</li><li>• Nominates other users, modifies existing user roles, and deactivates users (if necessary)</li><li>• Reviews, affirms and if necessary, disputes records associated with the teaching hospital</li><li>• Views and downloads the system generated messages</li></ul>
Authorized Representative	<ul style="list-style-type: none"><li>• Reviews, affirms and if necessary, disputes records associated with the teaching hospital</li><li>• Nominates other individuals for user roles with teaching hospital (nominations must be confirmed by an authorized official)</li><li>• Views and downloads the system generated messages</li></ul>

# Next Steps & Available Resources

# Next Steps

## **For New Physicians, NPPs and Teaching Hospitals:**

- Register self in IDM and request access to the Open Payments system
- Register self and teaching hospital (if applicable) in Open Payments system
- Assign user roles to serve on your behalf
  - Physicians/NPPs: You may assign an authorized representative
  - Teaching hospitals: You may assign authorized representatives and/or authorized officials
- Continue reviewing data until end of the calendar year

## **For Returning Physicians, NPPs and Teaching Hospitals:**

- Ensure your IDM account is active
  - Contact Open Payments Help Desk for assistance with deactivated accounts, if necessary
- Confirm user roles and/or assign additional individuals to user roles
  - Physicians/NPPs: Confirm and/or assign an authorized representative
  - Teaching hospitals: Confirm and/or assign authorized representatives and authorized officials
- Continue reviewing data until end of the calendar year

# Available Resources

- Review available resources on the Resources page of the CMS Open Payments website at <https://www.cms.gov/OpenPayments/About/Resources.html>
  - Open Payments User Guide for Covered Recipients
  - Tutorials
  - Teaching Hospital Lists
  - Quick Reference Guides
    - Covered Recipients Review and Dispute Process
    - Identity Management System (IDM) Registration
    - Physician and NPP Registration
    - Nominating a Physician or NPP Authorized Representative and Accepting/Rejecting Nominations
    - Teaching Hospital Registration
    - Teaching Hospital User Roles and Nominations

# Available Resources

- Register for CMS email notifications via the Open Payments website to receive e-mail updates about Open Payments
- Open Payments Help Desk:
  - [openpayments@cms.hhs.gov](mailto:openpayments@cms.hhs.gov)
  - 1-855-326-8366
  - 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.
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