



User Guide

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

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

June 2016

Disclaimer: The Centers for Medicare & Medicaid Services (CMS) is providing this guidance document as informational material on Open Payments. Although every reasonable effort has been made to assure the accuracy of the information, it is the responsibility of the user to ensure adherence to the requirements of the Open Payments implementing regulations, the Medicare, Medicaid, Children's Health Insurance Programs; Transparency Reports and Reporting of Physician Ownership or Investment Interests Final Rule codified at 42 C.F.R. Parts 402 and 403 [CMS-5060-F]. This User Guide is not intended as a supplement or replacement of the Final Rule.

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PART I: INTRODUCTION

INTRODUCTION

Purpose of the Open Payments User Guide

This Open Payments User Guide includes definitions, descriptions, screenshots, tools, and tips designed to help applicable manufacturers, applicable group purchasing organizations (GPOs), physicians, and teaching hospitals better understand how to comply with Open Payments (the Sunshine Act), including how to operationalize the collecting and reporting of data.

As the Open Payments system develops, the User Guide will be updated accordingly. The User Guide consists of the following chapters:

- **Introduction to Open Payments**
- **Introduction to Reporting and Data Collection**
- **Applicable Manufacturer and Applicable Group Purchasing Organization (GPO) Registration**
- **Data Submission and Attestation**
- **Physician and Teaching Hospital Registration**
- **Review and Dispute**
- **Public Data Publishing**
- **Additional Information and Resources**

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Revision History

Version	Date Published	Description	Version Updates
1.0	August 2013	Initial Release	Chapters 1, 2, 3, & 4
2.0	June 2014	Update	Chapters 1, 2, 3, 4, & 7
3.0	July 2014	Update	Chapters 5, 8, & 9
3.1	August 2014	Update	Minor corrections and updates
4.0	December 2014	Update	Updates made to Chapter 5
5.0	January 2015	Update	Chapter 10 and updates for registration and data submission
6.0	March 2015	Update	Updates for registration and data submission
7.0	April 2015	Update	Updates for review and dispute
8.0	June 2015	Update	Updated Chapter 10 for PY2014 data publication
9.0	January 2016	Update	Updated throughout to reflect system updates in Jan 2016
10.0	June 2016	Update	Updated publication chapter, added to glossary

Chapter 1: Introduction to Open Payments (the Sunshine Act)

This introduction chapter provides general information about the program, an overview of the Open Payments system, and an explanation of how to determine if an entity is required by Open Payments to report certain payments or other transfers of value to [physicians](#) and [teaching hospitals](#), or certain physician ownership or investment interests.

Section 1.1: Program Overview

1.1a: What is the Affordable Care Act Section 6002?

Section 6002 of the Affordable Care Act [P.L. 110-148] amends Title XI of the Social Security Act to add Section 1128G, which mandates the creation of a program for (1) reporting payments and other transfers of value made to [covered recipients](#) and [physician owners or investors](#), by manufacturers of drugs, devices, [biologicals](#), or medical supplies for which payment is available under Medicare, Medicaid, or the Children's Health Insurance Program (CHIP); and (2) reporting ownership or investment interests held by physicians or their immediate family members in [applicable manufacturers](#) and [applicable GPOs](#), as well as reporting payments or other transfers of value made by these applicable manufacturers and applicable GPOs to these physicians.

This program establishes a system for annually reporting this data to the Centers for Medicare & Medicaid Services (CMS).

1.1b: What is the Purpose of Open Payments (the Sunshine Act)?

Open Payments is a national disclosure program that promotes transparency by publishing data on the financial relationships between the healthcare industry (applicable manufacturers and applicable GPOs; together referred to as reporting entities) and healthcare providers (physicians and teaching hospitals) on a publicly accessible website. This publically available website is designed to increase access to, and knowledge about, these relationships and provide the public with information to enable them to make informed decisions. The public can search, download, and evaluate the reported data.

Disclosure of the financial relationships between industry and healthcare providers is not intended to signify an inappropriate relationship, and Open Payments does nothing to prohibit such transactions. Collaborations among the medical product industry, physicians, and teaching hospitals contribute to the design and delivery of life-saving drugs, devices, biologicals, and medical supplies. However, these relationships may also influence research, education, and clinical decision-making in ways that compromise clinical integrity and patient care and may potentially lead to increased healthcare costs. While disclosure alone is not sufficient to differentiate between the beneficial financial relationships and those that may create conflicts of interest, transparency will shed light on the nature and extent of the relationships that exist and discourage development of inappropriate relationships.

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1.1c: Who Participates in Open Payments (the Sunshine Act)?

Open Payments requires participation from certain manufacturers of drugs, devices, biologicals, or medical supplies covered under Title XVIII of the Social Security Act (Medicare), or a State plan under Title XIX (Medicaid) of XXI of the Social Security Act (CHIP) and certain GPOs.

Applicable manufacturers of covered products, and entities under [common ownership](#) with applicable manufacturers who also provide [assistance and support](#), are required to annually report to CMS:

- Payments or other transfers of value made to physicians and teaching hospitals.
- Certain ownership or investment interests held by physicians or their immediate family members.
- Applicable GPOs are required to annually report to CMS:
 - Payments or other transfers of value made to physician owners or investors.
 - Certain ownership or investment interests held by physicians or their immediate family members.

While not required to participate, Open Payments encourages physicians and teaching hospitals to participate by tracking their financial relationships with applicable manufacturers and applicable GPOs and reviewing data reported about them in the Open Payments system to ensure the accuracy of the information.

Open Payments also encourages the general public and healthcare consumers to access, review, and use the data to make informed healthcare decisions.

1.1d: Key Dates for Open Payments Program Years

For each program year, the following dates are of key importance:

Applicable manufacturers and applicable GPOs were required to **collect data** documenting their financial relationships with certain physicians and teaching hospitals for the period of January 1 to December 31 of each year.

Data submission for a program year begins in February of the following year and runs through the end of March. For example, data submission for program year 2015 takes place in February and March of 2016.

The review and dispute period occurs after the submission period ends and extends for at least 45 days. During this period, physicians and teaching hospitals review and, if necessary, dispute data submitted by reporting entities. Applicable manufacturers and applicable GPOs can then correct the data to resolve any disputes.

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Program year data will be published by June 30 of the year after the program year. For example, program year 2015 data will be published by June 30, 2016. A refresh of the data is published early in the year after the initial data publication.

Registration for the Open Payments system, and the ability to dispute data, is available year-round. Information on these activities and time periods is provided throughout this document.

The table below lists key program dates for a program year.

Figure 1.1: Key Dates for an Open Payments Program Year

Program Activities	Program Timeline
Industry submits and attests to data in the Open Payments system	February-March of the program year (PY)
Physicians and teaching hospitals review the reported data and dispute any data they believe is inaccurate; industry makes corrections to the data	Review and dispute period: April –May, PY+1 AM/GPO Correction period: May-June, PY+1
Initial program year initial data publication Prior program year data refresh publication	June 30, PY+1
Physicians and teaching hospitals continue to review and dispute data; industry continues to make corrections to the data	June – December 31, PY+1
Open Payments data refresh	Early PY+2

Section 1.2: Determining if an Entity is an Applicable Manufacturer or Applicable GPO

Open Payments requires certain entities that make payments or other transfers of value to physicians or teaching hospitals to report relevant data regarding the payment or other transfers of value to CMS.

To determine if a particular entity is required to report, follow these steps:

Step 1: Determine if the entity operates in the United States (including any territory, possession, or commonwealth of the United States). See the reference guide in **Figure 1.2**.

Step 2: Determine if the entity engages in activities of a Type 1 or Type 2 applicable manufacturer. See the reference guide in **Figure 1.2**.

Step 3: Determine if the entity's products are covered drugs, devices, biologicals, or medical supplies, or covered products. See the reference guide in **Figure 1.2**.

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Step 4: If the entity possesses the characteristics illustrated in **Figure 1.2**, **the entity is determined to be an applicable manufacturer in Open Payments.**

If the entity does not meet these characteristics, the entity is not determined to be an applicable manufacturer. Note that the entity still may be an applicable GPO in Open Payments.

Proceed to Step 5 to determine if the entity is an applicable GPO.

Step 5: Determine if the entity operates in the United States (includes any territory, possession, or commonwealth of the United States). See the reference guide in **Figure 1.3.**

Step 6: Determine if the entity engages in activities of an applicable GPO. See the reference guide in **Figure 1.3.**

Step 7: Determine if the entity's products are covered drugs, devices, biologicals, or medical supplies, or covered products. See the reference guide in **Figure 1.3.**

Step 8: If the entity possesses the characteristics illustrated in **Figure 1.3**, **the entity is determined to be an applicable GPO in Open Payments.**

If the entity does not possess the characteristics as illustrated in **Figure 1.3**, the entity is not determined to be an applicable GPO in Open Payments.

Figure 1.2 provides a reference guide for determining if a drug, device, biological, or medical supply manufacturer is an applicable manufacturer in accordance with Open Payments. **Figure 1.2** also outlines the characteristics for two types of applicable manufacturers.

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Figure 1.2: Determining if an Entity Is an Applicable Manufacturer

Characteristic	Type 1 Manufacturer IF	Type 2 Manufacturer IF
Operate in US?	<ul style="list-style-type: none"> Entity’s physical location is within the United States and/or it conducts activities within the United States. This includes any territory, possession, or commonwealth of the United States. 	<ul style="list-style-type: none"> Same as Type 1 Manufacturer.
Activities	<ul style="list-style-type: none"> Engages in the production, preparation, propagation, compounding, or conversion of a covered drug, device, biological, or medical supply. This includes distributors or wholesalers that hold title to a covered drug, device, biological, or medical supply. 	<ul style="list-style-type: none"> Exists under common ownership with a Type 1 applicable manufacturer AND Provides assistance or support to such an entity with respect to the production, preparation, propagation, compounding, conversion, marketing, promotion, sale, or distribution of a covered drug, device, biological, or medical supply.
Covered Products	<ul style="list-style-type: none"> Reimbursed by Medicare, Medicaid, or Children’s Health Insurance Program AND If the product is a drug or biological, and it requires a prescription (or doctor’s authorization) to administer OR If the product is a device or medical supply, and it requires premarket approval or premarket notification by the FDA. 	<ul style="list-style-type: none"> Same as Type 1 Manufacturer.

Figure 1.3 provides a reference guide for determining if a drug, device, biological, or medical supply purchasing entity is an applicable GPO in accordance with Open Payments. **Figure 1.3** also outlines the characteristics of applicable GPOs.

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Figure 1.3: Determining if an Entity Is an Applicable GPO

Characteristic	Group Purchasing Organization IF
Operate in US?	<ul style="list-style-type: none"> • Entity’s physical location is within the United States and/or it conducts activities within the United States. This includes any territory, possession, or commonwealth of the United States.
Activities	<ul style="list-style-type: none"> • Purchases, arranges for, or negotiates the purchase of a covered drug, device, biological, or medical supply for a group of individuals or entities, but not solely for use by the entity itself.
Covered products	<ul style="list-style-type: none"> • Reimbursed by Medicare, Medicaid, or Children’s Health Insurance Program AND • If the product is a drug or biological, it requires a prescription (or doctor’s authorization) to administer OR • If the product is a device or medical supply, it requires pre-market approval or pre-market notification by the FDA.

Section 1.3: Who Are Entities Reporting On

Applicable manufacturers and applicable GPOs are required to report payments or other transfers of value to covered recipients and physician owners/investors. Covered recipients in Open Payments include physicians (except for physicians who are bona fide employees of the reporting entity) and teaching hospitals. For the purposes of Open Payments, physicians are defined as doctors of medicine or osteopathy practicing medicine or surgery, doctors of dental medicine or dental surgery practicing dentistry, doctors of podiatric medicine, doctors of optometry, or chiropractors; all legally authorized to practice by their state.

A teaching hospital is any institution that received a payment for Medicare direct graduate medical education (GME), inpatient prospective payment system (IPPS) indirect medical education (IME), or psychiatric hospital IME programs under 1886(d) (5) (B), 1886(h), or 1886(s) of the Social Security Act during the last calendar year for which such information is available.

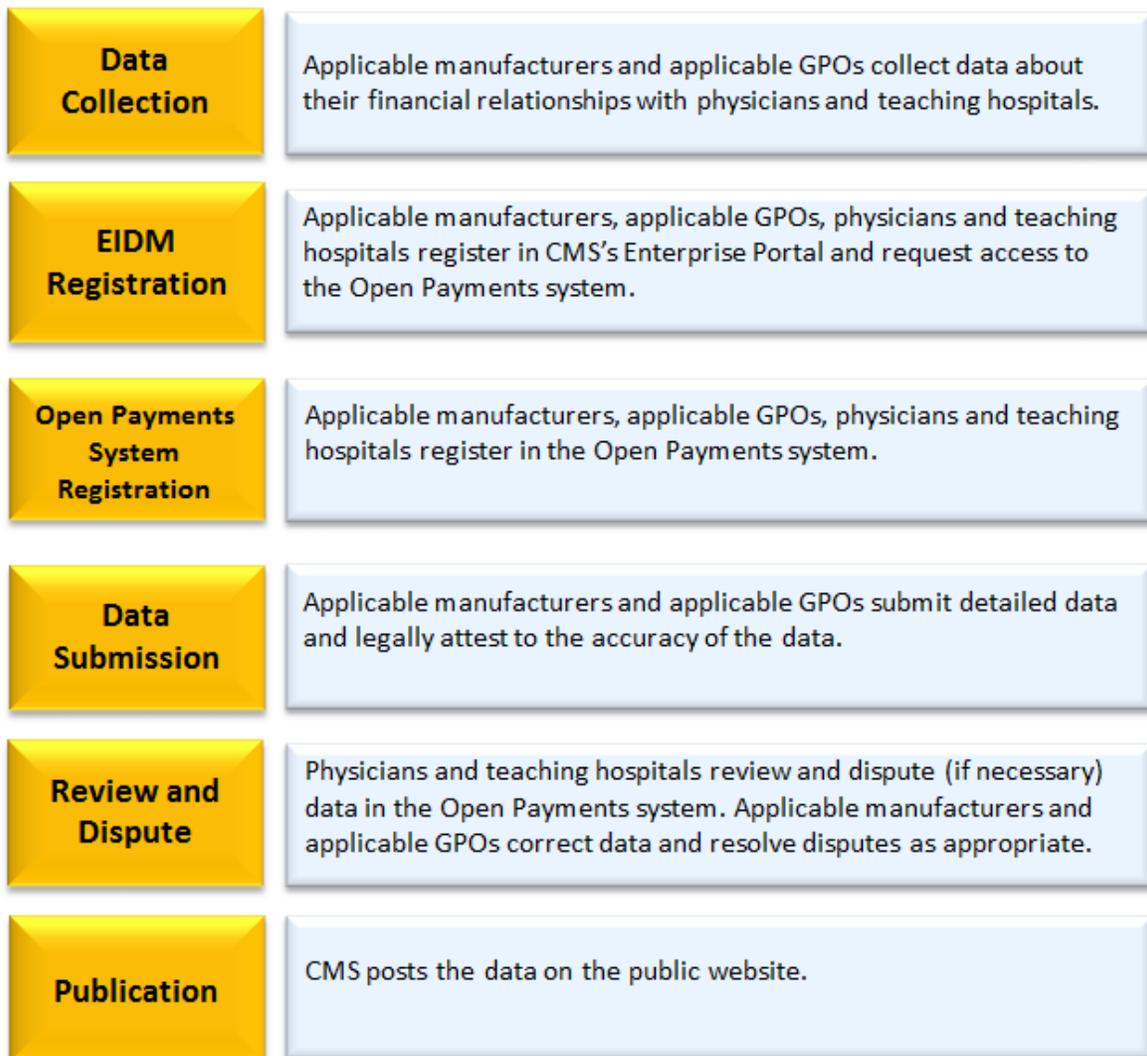
Additionally, applicable manufacturers and applicable GPOs are required to report ownership or investment interests in the entity held by a physician (referred to as a physician owner or investor) or the physician’s immediate family members, and report payments or other transfers of value to these physicians holding ownership or investment interests. A physician’s immediate family member is the physician’s (1) spouse; (2) natural or adoptive parent, child, or sibling; (3) step-parent, step-child, step-brother, or step-sister; (4) father, mother, daughter, son, brother, or sister-in-law; (5) grandparent or grandchild; or the (6) spouse of a grandparent or grandchild.

Section 1.4: Open Payments System Overview

The Open Payments system is the tool developed to support Open Payments. Users will interact with the system to perform a number of functions based on their role.

Applicable manufacturers, applicable GPOs, physicians, and teaching hospitals who participate in the Open Payments program must register in the Open Payments system. **Figure 1.4** provides a high-level process flow.

Figure 1.4: High-Level Process Flow for Open Payments



1.4a: Open Payments Browser Requirements

The Open Payments system is a web-based application and should be run only on Internet Explorer (version 8 or higher) or Mozilla Firefox.

1.4b: Functionalities within the Open Payments System

Users will 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 with the Open Payments system.

Key functions of Open Payments system users include the following:

- For applicable manufacturers/applicable GPOs: Register in the system, submit data into the system, verify the data, and attest to the accuracy of the data.
- For physicians/teaching hospitals: Register in the system, review the data supplied by applicable manufacturers and/or applicable GPOs, and dispute or affirm the data.

This User Guide will cover functions of the system in detail in each chapter.

When working in the Open Payments system, it is important to remember to never use the navigation buttons on your browser toolbar. Only use the navigation buttons (i.e., "Back" button) within the Open Payments system itself.

1.4c: Setting Email Filters to Accept Open Payments Emails

The Open Payments system will transmit emails to communicate to users. Take precautions to ensure that these emails are not directed into your junk mail or spam folders. Open Payments notification emails will come from the address openpaymentsnotifications@cms.hhs.gov.

1.4d: Accessibility Guidance

This section provides some basic guidance for keyboard and JAWS screen reader users. While not all screen reader users use JAWS and not all JAWS users have the same version, this guidance should be applicable to other screen readers and most versions of JAWS.

1.4d (1): "Skip to Main Content" Link

The "Skip to main content" link provides a shortcut to the main content of the page. Using the link allows a keyboard user to reach the core information on the page without having to tab through the global portal banner.

Screen reader users can use the link to jump their screen reader to the start of the portal content and skip the global banner area on each page. Activating the "Skip to main content" link brings the user to the beginning of the Open Payments content area on the page.

1.4d (2): Useful JAWS Keystrokes

The keystrokes given in Figure 1.5 find the next occurrence of a particular element on a page. Using the Shift key at the same time will find the previous occurrence. These shortcuts allow a screen reader user

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to quickly jump their screen reader between the form fields on each page or explore the overall structure of the page by jumping between the different headings on the page that denote the start of different content areas on the page.

Figure 1.5: Useful JAWS Keystrokes

Key	What it finds	Why this is useful
F	Form field	The F key allows users to move from form field to form field. The majority of pages in the Open Payments website are made of forms. The F key allows JAWS users to determine what fields are on the Open Payments form pages quickly.
H	Heading	The H key allows users to move from heading to heading. Headings define the structure of many pages. Moving between sections of an Open Payments page allows for a quick guide to page structure and a way to access sections easily.

Section 1.5: Additional Information and Resources

CMS supports Open Payments system users through a number of different methods. These include webinars, Frequently Asked Questions (FAQs), step-by-step quick reference guides (QRGs), and technical support provided by the Open Payments Help Desk.

1.5a: Open Payments Website

The Open Payments website at <http://www.cms.gov/openpayments> is your primary resource for information about Open Payments. This website contains numerous resources aimed at preparing and informing users about Open Payments regulations as well as the system. Check this website often for updated tools, resources, and important announcements pertaining to Open Payments.

1.5b: Open Payments Resources

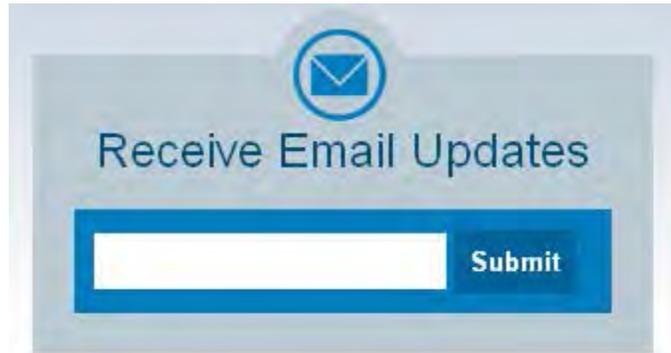
CMS has developed many resources to help applicable manufacturers, applicable GPOs, physicians, and teaching hospitals understand and participate in the Open Payments program. These resources cover topics such as registration, data collection and submission, the review and dispute process, and data publication. They can be found on the Resources page of the Open Payments website, at <http://www.cms.gov/OpenPayments/About/Resources.html>.

1.5c: Open Payments Help Desk

The Open Payments Help Desk serves as the single point of contact for all Open Payments-related inquiries. The Help Desk offers guidance on Open Payments, actions users can take in the system, and technical support. You can submit inquiries to openpayments@cms.hhs.gov or call 1-855-326-8366. The Help Desk's hours of operation are posted on Open Payments website.

1.5d: Open Payments Email Updates

By registering for the Open Payments email updates, you will be signed up to receive periodic email notifications regarding program, system, and resource updates. This is a good way to keep informed on any updates, changes, or important messages from CMS. To sign up for the Open Payments emails, visit the Open Payments website at <https://www.cms.gov/openpayments/> and enter your email address at the bottom of the home page.



Entering your email address will take you to a page where you can select which email updates you want to subscribe to. At the top of the page, your email address will be pre-populated after “Quick Subscribe for.”



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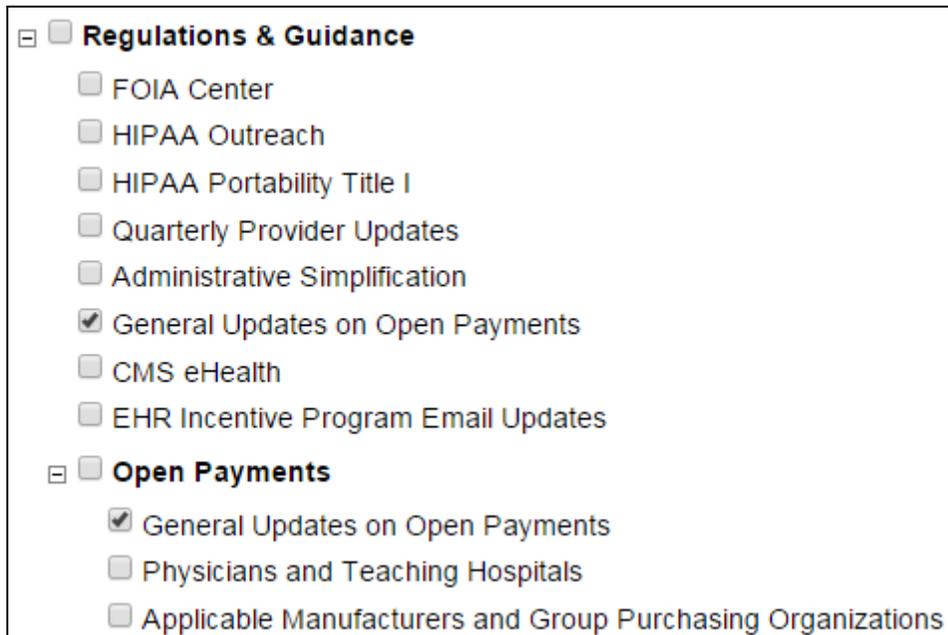
Quick Subscribe for [your email address]

Centers for Medicare & Medicaid Services (CMS) offers updates on the topics below. Subscribe by checking the boxes; unsubscribe by unchecking the boxes.

Access your [subscriber preferences](#) to update your subscriptions or modify your password or email address without adding subscriptions.

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Under the Section “Regulations and Guidance,” select “General Updates on Open Payments” and then the “Submit” button at the bottom of the page to join the mailing list. You may also select either the boxes entitled “Physicians and Teaching Hospitals” or “Applicable Manufacturers and Group Purchasing Organizations.” Make sure you also select the general updates box to ensure you receive all appropriate email updates.



The screenshot shows a web form with two main sections. The first section is titled "Regulations & Guidance" and contains several checkboxes: FOIA Center, HIPAA Outreach, HIPAA Portability Title I, Quarterly Provider Updates, Administrative Simplification, General Updates on Open Payments (checked), CMS eHealth, and EHR Incentive Program Email Updates. The second section is titled "Open Payments" and contains three checkboxes: General Updates on Open Payments (checked), Physicians and Teaching Hospitals, and Applicable Manufacturers and Group Purchasing Organizations.

1.5e: Open Payments Mobile Application

CMS has created two mobile applications to help applicable manufacturers, applicable GPOs, and physicians keep track of payments and other transfers of value. Application users can use these apps as a way to track payments and other transfers of value in real time on a mobile device as they occur throughout the year.

There are separate apps for industry and physicians:

- For applicable manufacturers and applicable GPOs: *Open Payments Mobile for Industry*
- For physicians: *Open Payments Mobile for Physicians*

These mobile apps do not interface with CMS systems or contractors in any way, and only serve as a mechanism to store data. CMS does not validate the accuracy of data stored in the app and is not responsible for protecting data stored in the app. These mobile apps are free and can be downloaded at the Google Play app store or iOS Apple app store by searching for “Open Payments.” Additional information on the apps, including an FAQ for Open Payments Mobile, can be found on the Resources page of the Open Payments website at <https://www.cms.gov/OpenPayments/About/Resources.html>.

PART II: REPORTING AND DATA COLLECTION

Reporting and Data Collection

For Industry

Chapter 2: Introduction to Reporting and Data Collection

This chapter provides information about data collection for entities required to report certain payments and other transfers of value in Open Payments.

Data is reported to the Open Payments system through bulk file uploads using character-separated value (CSV) files and through manual data entry through a graphic user interface (GUI). See Chapter 4 for details on how to prepare and submit the data.

A complete listing of metadata elements used for payments data input into the Open Payments system can be found in the “Submission Data Mapping Document,” which is available on the Resources page of the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>. This extensive listing includes specific, detailed descriptions of the information that must be collected by reporting entities to document general, research, and physician ownership/investment interest payments.

Section 2.1: General Payments Reporting and Data Collection

This section on general payments reporting and data collection provides information about data collection for entities required to report certain general payments and other transfers of value in the Open Payments system. Five categories of information related to [general payments](#) made by applicable manufacturers and applicable GPOs to recipient physicians and teaching hospitals should be captured during data collection; these categories are shown in the bulleted list below.

On the Resources page of the Open Payments website (<https://www.cms.gov/OpenPayments/About/Resources.html>), you can find the CSV sample files (templates) that show how the data elements listed below will be reported to the Open Payments system.

- **Submission File Information** contains metadata elements collected to properly identify and attribute submitted files.
- **Recipient Demographic Information** identifies the recipient of the general payment or other transfers of value.
- **Associated Drug, Device, Biological, or Medical Supply Information** identifies the drug, device, biological, or medical supply that is related to the payment or other transfers of value.

- **Payment or Other Transfers of Value Information** specifies information regarding the general payment or other transfers of value.
- **General Record Information** captures other general information about the payment or other transfers of value.

Section 2.2: Research Payments Reporting and Data Collection

This section on research payments reporting and data collection provides information about data collection for entities required to report certain research-related payments and other transfers of value in the Open Payments system. Five categories of information related to [research payments](#) made by applicable manufacturers and applicable GPOs to covered recipient physicians and teaching hospitals should be captured during data collection; these categories are shown in the bulleted list below.

On the Resources page of the Open Payments website (<https://www.cms.gov/OpenPayments/About/Resources.html>), you can find the CSV templates that show how the data elements listed below will be reported to the Open Payments system.

- **Submission File Information** contains metadata elements collected to properly identify and attribute submitted files.
- **Recipient Demographic Information** identifies the recipient of the research payments or other transfers of value.
- **Associated Drug, Device, Biological or Medical Supply Information** identifies the drug, device, biological, or medical supply that is related to the payment or other transfers of value.
- **Payment or Other Transfers of Value Information** specifies information regarding the research payment or other transfers of value.
- **Research-related Information** captures specific information about payments or other transfers of value for research activities.

Section 2.3: Physician Ownership/Investment Interests Reporting and Data Collection

This section on physician ownership/investment interests reporting and data collection provides information about data collection for reporting entities required to report physician ownership or investment interests in the Open Payments system.

Three categories of information related to ownership/investment interests held by physicians in applicable manufacturers and applicable GPOs should be captured during data collection; these categories are shown in the bulleted list below.

On the Resources page of the Open Payments website (<https://www.cms.gov/OpenPayments/About/Resources.html>), you can find the CSV sample files

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(templates) that show how the data elements listed below will be reported to the Open Payments system.

- **Submission File Information** contains metadata elements collected to properly identify and attribute submitted files.
- **Physician Demographic Information** identifies the recipient of the ownership or investment interests.
- **Ownership or Investment Information** captures information about the ownership or investment.

**PART III: APPLICABLE MANUFACTURERS
AND APPLICABLE GROUP PURCHASING
ORGANIZATIONS**

Open Payments Registration For Industry

Chapter 3: Applicable Manufacturer and Applicable GPO Registration

This chapter provides information on registering in CMS's Enterprise Identity Management system (EIDM) via the CMS Enterprise Portal at <https://portal.cms.gov> and registering in the Open Payments system. Registration in both systems is required for access to the Open Payments system. All applicable manufacturers and applicable GPOs that make payments or other transfers of value to covered recipients and physician owners or investors for the Open Payments program must complete registration for both systems (EIDM and Open Payments) prior to reporting payments or other transfers of value made to physicians and teaching hospitals. Note that registration is required for reporting entities submitting data in a single report as well as reporting entities submitting data as part of a consolidated report.

This chapter is divided into the following sections:

- **Two-Step Registration Process Overview**, which provides information about the registration process. Registration includes user registration in EIDM via the CMS Enterprise Portal, as well as registration in the Open Payments system.
- **EIDM Registration**, which provides details on registering for EIDM and requesting access to the Open Payments system.
- **Registering Applicable Manufacturers and Applicable GPOs for the Open Payments System**, which contains instructions for registering, logging in to the system, and managing the applicable manufacturer or applicable GPO registration and user roles.
- **Entity Re-Certification**, which contains instructions for re-certifying reporting entity information in the Open Payments system for entities that registered for the prior program year.
- **Open Payments Users and User Roles**, which contains information on who is authorized to register in the Open Payments system and the user roles that must be filled by the Open Payments system users.
- **Vetting**, which contains information on the reporting entity vetting process and timeframes.

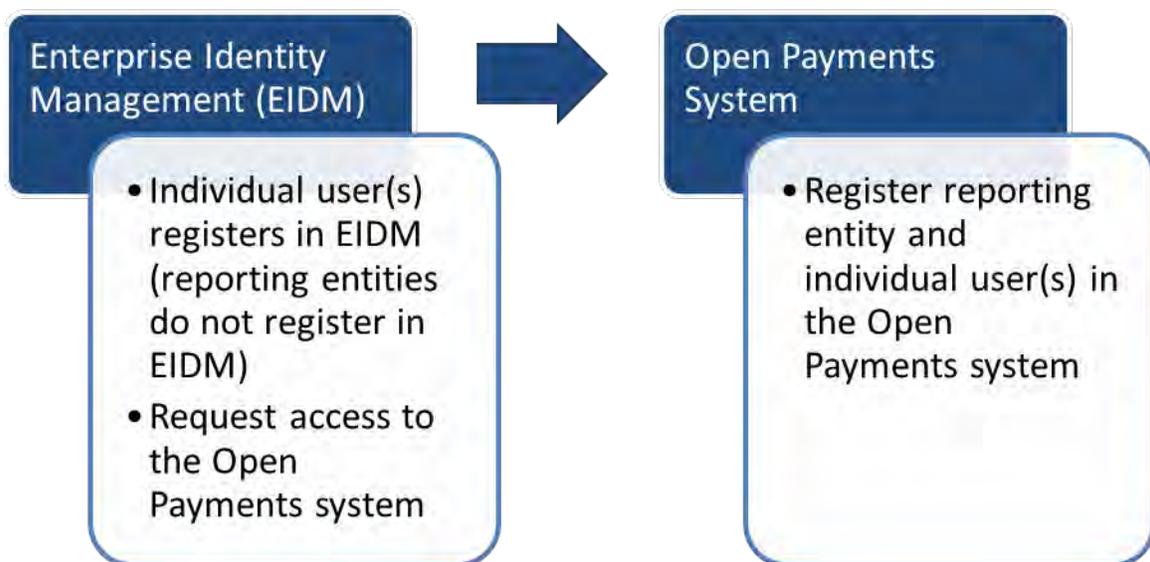
Section 3.1: Two-Step Registration Process Overview

Applicable manufacturers and applicable GPOs must register in the Open Payments system to submit, attest, correct, and view data.

Prior to registration in the Open Payments system, users must successfully register in EIDM to obtain log in credentials. Once the user has registered in EIDM, they will be able to register in the Open Payments system.

Open Payments registration is completed in two steps, illustrated in Figure 3.1. First, users must obtain EIDM credentials and request access to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov>. Second, users must register their reporting entity in the Open Payments system. If their reporting entity already has been registered, they can register themselves as an individual and affiliate themselves with that reporting entity.

Figure 3.1: Applicable Manufacturer and Applicable GPO Registration



Section 3.2: Enterprise Identity Management (EIDM) Registration and Open Payments Access

Enterprise Identity Management (EIDM) is an identity management and services system that (1) serves as an identity proofing tool to verify a person's identity; and (2) provides users with access to various CMS applications. Registering in EIDM provides users with log in credentials **required** for access to the Open Payments system. Users will be able to set up their own log in credentials in the form of a user ID and password during the EIDM registration process. EIDM credentials allow users to log in to the CMS Enterprise Portal and request access to various CMS applications, including the Open Payments system.

To begin the registration process, EIDM can be accessed via the CMS Enterprise Portal at <https://portal.cms.gov>. A list of EIDM FAQs is available on the CMS portal at <https://portal.cms.gov/wps/portal/unauthportal/faq>, and information about EIDM registration can be found on the Resources page of the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>. Users who already have EIDM credentials can

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move ahead to Section 3.2b for instructions on how to request access to the Open Payments application.

EIDM will lock your user account if no activity is reported in the account for 60 or more days. When you log in after 60-days, the system will display the “Unlock My Account” view. To unlock your account, enter your user ID and correctly answer all challenge questions. Then enter your new password in the input fields of “New Password” and “Confirm New Password” to unlock your account. If you are still unable to reactivate, contact the Open Payments Help Desk at openpayments@cms.hhs.gov or call 1-855-326-8366.

EIDM will automatically deactivate any user that has not logged in for 180 days or more. Once the user’s account has been deactivated, the user will not be able to access CMS applications, including the Open Payments system. You can contact the Open Payments Help Desk at openpayments@cms.hhs.gov or call 1-855-326-8366 to reinstate your account after 180 days of inactivity.

3.2a: EIDM New User Registration

Step 1: Go to the CMS Enterprise Portal at <https://portal.cms.gov> and select “New User Registration.” “New User Registration” is on the right side of the page, inside the “Login to CMS Secure Portal” box.



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Step 2: Accept the Terms and Conditions of the CMS Enterprise Portal page and then select the “Next” button to continue.



Step 3: Enter your personal user information. Be sure to enter all information in all required fields. Filling in all fields will speed the processing of your registration. **Note: Selecting the “Cancel” button will cause you to lose all data entered.** Select the “Next” button when all information has been entered.

Data fields to be completed are the following:

- Name (First, Middle, Last, Suffix)
- Home Address, City, State, Zip Code
- Primary Phone Number
- Email Address
- Social Security Number (*Optional*)
- Date of Birth

Take care to enter your legal name, current home address, primary phone number, and email address correctly. EIDM collects personal information only to verify your identity with Experian, an external identity verification provider. If this information is not validated successfully and identity proofing fails, contact the Open Payments Help Desk at openpayments@cms.hhs.gov or 1-855-326-8366.

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NOTE FOR INDIVIDUALS WITH FOREIGN ADDRESSES: Individuals with addresses outside of the United States can register in EIDM via the online portal, but the identity proofing must be conducted manually. Once you have entered your information into the CMS Enterprise Portal, contact the Open Payments Help Desk at openpayments@cms.hhs.gov for assistance with the manual identity proofing process.

The screenshot shows the 'Your Information' section of the 'New User Registration' form on the CMS.gov Enterprise Portal. The page header includes the CMS.gov logo and 'Enterprise Portal' text. Below the header, there are navigation links for 'Health Care Quality Improvement System' and 'Provider Resources'. The main content area is titled 'Your Information' and contains several input fields and instructions:

- First Name:** A text input field.
- Middle Name:** A text input field.
- Last Name:** A text input field.
- Suffix:** A dropdown menu.
- E-mail Address:** A text input field.
- Confirm E-mail Address:** A text input field.
- Social Security Number:** A series of input boxes for the 9-digit number.
- Date of Birth:** A date selection field in MM/DD/YYYY format.
- Address:** Radio buttons for 'U.S. Home Address' (selected) and 'Foreign address'. Below are input fields for 'Home Address Line 1', 'Home Address Line 2', 'City', 'State' (dropdown), 'Zip Code', 'Zip Code Extension', and 'Country: USA'.
- Primary Phone Number:** A text input field.

At the bottom of the form, there are two buttons: 'Cancel' and 'Next'.

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Step 4: Select an EIDM user name and password in accordance with the guidance provided below. You will also be asked to select three challenge questions and provide answers in the open text fields next to the question fields. Select “Next” when finished.

Note: Selecting the “Cancel” button will cause you to lose all data entered.

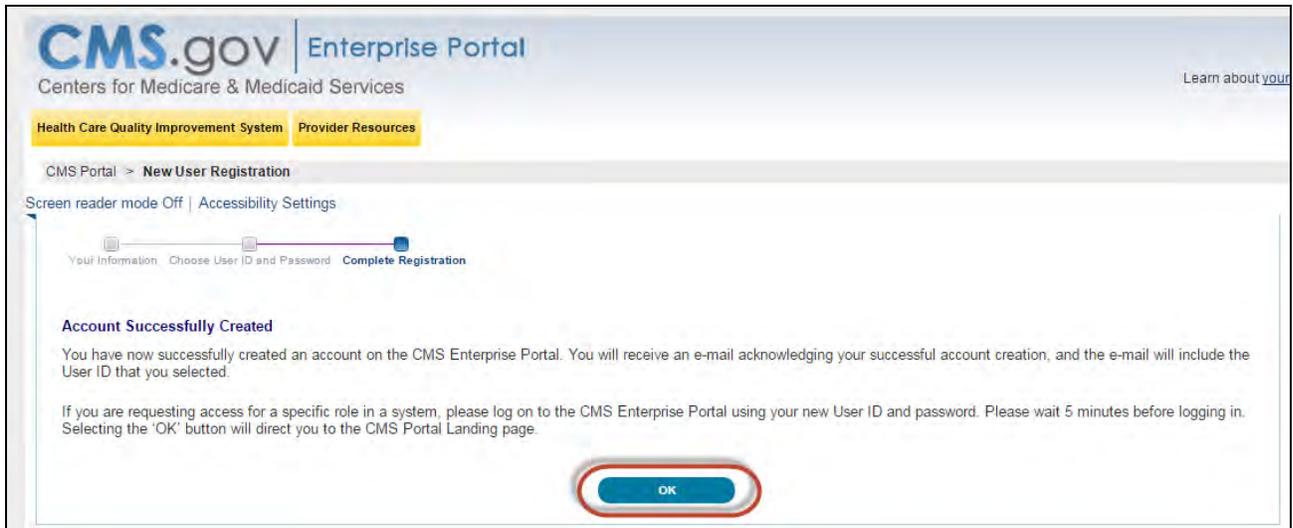
The screenshot shows the 'New User Registration' page on the CMS.gov Enterprise Portal. The main heading is 'Choose User ID And Password'. There are three input fields: 'User ID' (with the value 'outreach50'), 'Password', and 'Confirm Password'. Below these is a section titled 'Select your Challenge Questions and Answers:' with three questions and their corresponding answers: 'What is your favorite radio station?' (FM), 'What is the name of the manager at your first job?' (Mary), and 'What is your favorite cuisine?' (Italian). At the bottom, there are 'Cancel' and 'Next' buttons. The 'Next' button is highlighted with a red oval, and red arrows point to the 'User ID' field and the challenge questions section.

- The CMS Portal User ID must:
 - Must be a minimum of 6 and a maximum of 74 characters; and
 - Can contain alphanumeric characters, dashes (-), underscores (_), apostrophes ('), at signs (@), and periods (.).
- The CMS Portal password must:
 - Be changed at least every 60 days;
 - Be a minimum of 8 and a maximum of 20 characters;
 - Be changed no more than once per day;
 - Contain at least one uppercase letter, one lowercase letter, one number, and one special character;
 - May contain special characters except: Question mark (?), less than (<), greater than (>), left bracket ([), right bracket (]), apostrophe ('), quotation marks ("), forward slash (/), backslash (\), and ampersand (&);
 - Not contain your User ID; and

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- Differ from your previous 6 passwords.

Once EIDM registration is completed, select the “OK” button to take you to the CMS Portal landing page. After selecting “OK” you will receive an email confirmation that contains your confirmed EIDM User ID along with a link to the CMS Enterprise Portal.



Step 5: Request access to the Open Payments system. Proceed to Section 3.2b for instructions on how to do so.

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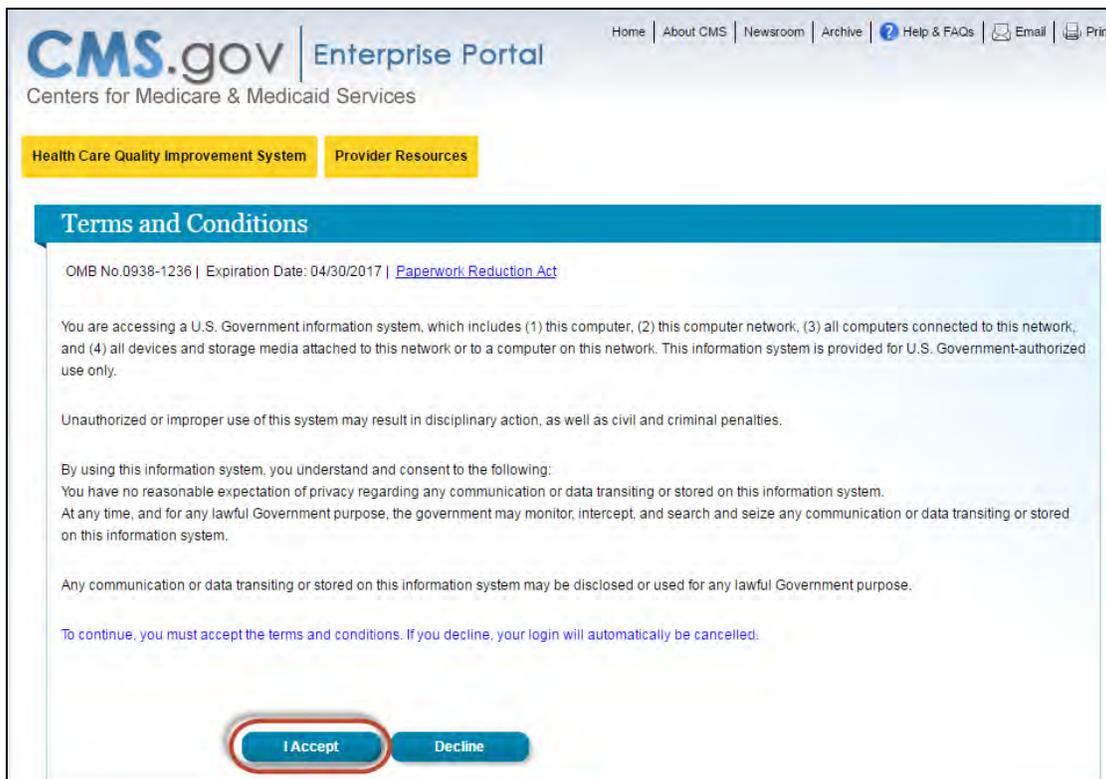
3.2b: Requesting Access to Open Payments with EIDM Credentials

Once you have EIDM credentials, you can request access to the Open Payments system through the Enterprise Portal at <https://portal.cms.gov>.

Step 1: On the Enterprise Portal home page, select “Login to CMS Secure Portal.”



Step 2: Accept the Terms and Conditions on the “CMS Enterprise Portal” page.



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Step 3: Once you have accepted the terms, enter your existing user ID and select “Next.”

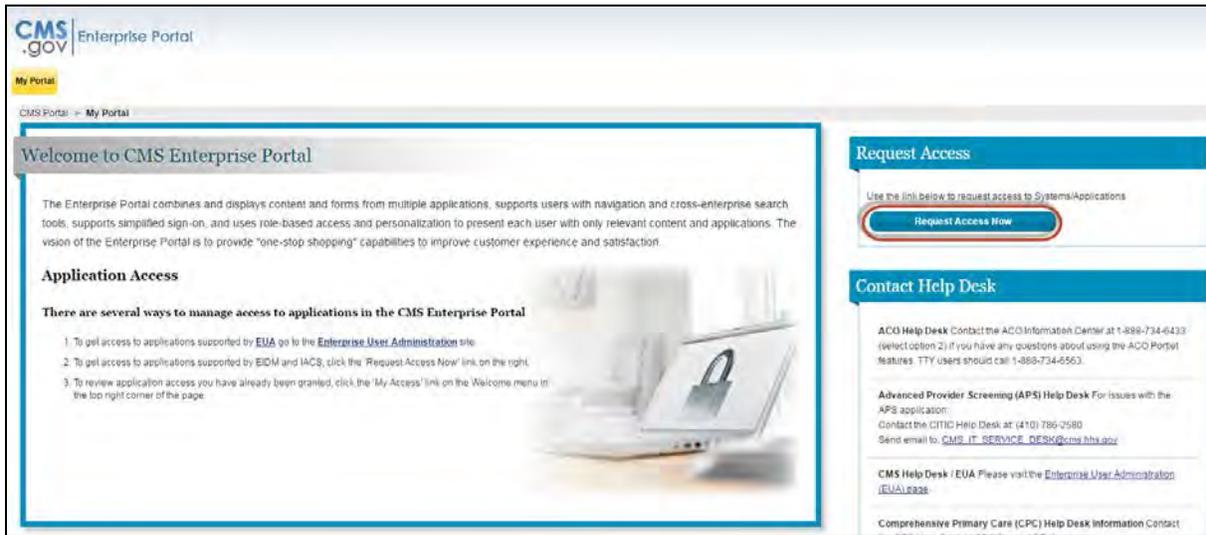
The screenshot shows the CMS.gov Enterprise Portal login page. At the top, the CMS.gov logo and 'Enterprise Portal' are displayed, along with navigation links for Home, About CMS, Newsroom, Archive, Help & FAQs, Email, and Print. Below the header, there are two yellow buttons: 'Health Care Quality Improvement System' and 'Provider Resources'. A blue banner reads 'Welcome to CMS Enterprise Portal'. The main content area features a 'User ID' input field with the text 'outreach50' and a red arrow pointing to it. Below the input field are two buttons: 'Next' (highlighted with a red oval) and 'Cancel'. At the bottom, there are links for 'Forgot User ID?' and 'Need an account? Click the link - New user registration'.

Step 4: Enter the password associated with the User ID entered on the previous page and select “Log In.”

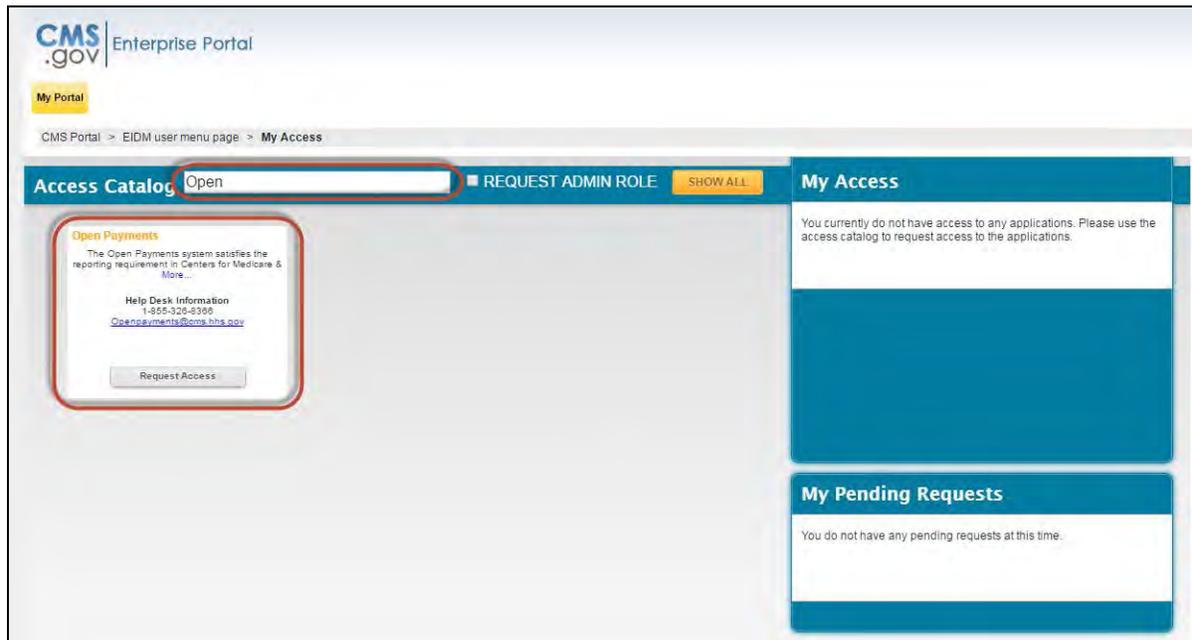
The screenshot shows the CMS.gov Enterprise Portal login page, identical to the previous one. The 'User ID' field is now filled with 'outreach50'. The 'Password' input field is highlighted with a red arrow and contains a series of dots. Below the input field are two buttons: 'Log In' (highlighted with a red oval) and 'Cancel'. At the bottom, there is a link for 'Forgot Password?'.

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Step 5: Select “Request Access Now.”



Step 6: Search for the Open Payments application by typing “Open” into the search box at the top of the page or by scrolling down the page until you reach “Open Payments.” Select “Request Access” under the Open Payments application box.



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Step 7: From the drop-down menu, select “Open Payments – Open Payments Application” from the “Application Description” drop-down menu. Select “Applicable Manufacturer, GPO, Physician, or Teaching Hospital” from the “Role” drop-down menu. Select the “Submit” button when complete.

Note: Selecting the “Cancel” button will cause you to lose your selected choices.

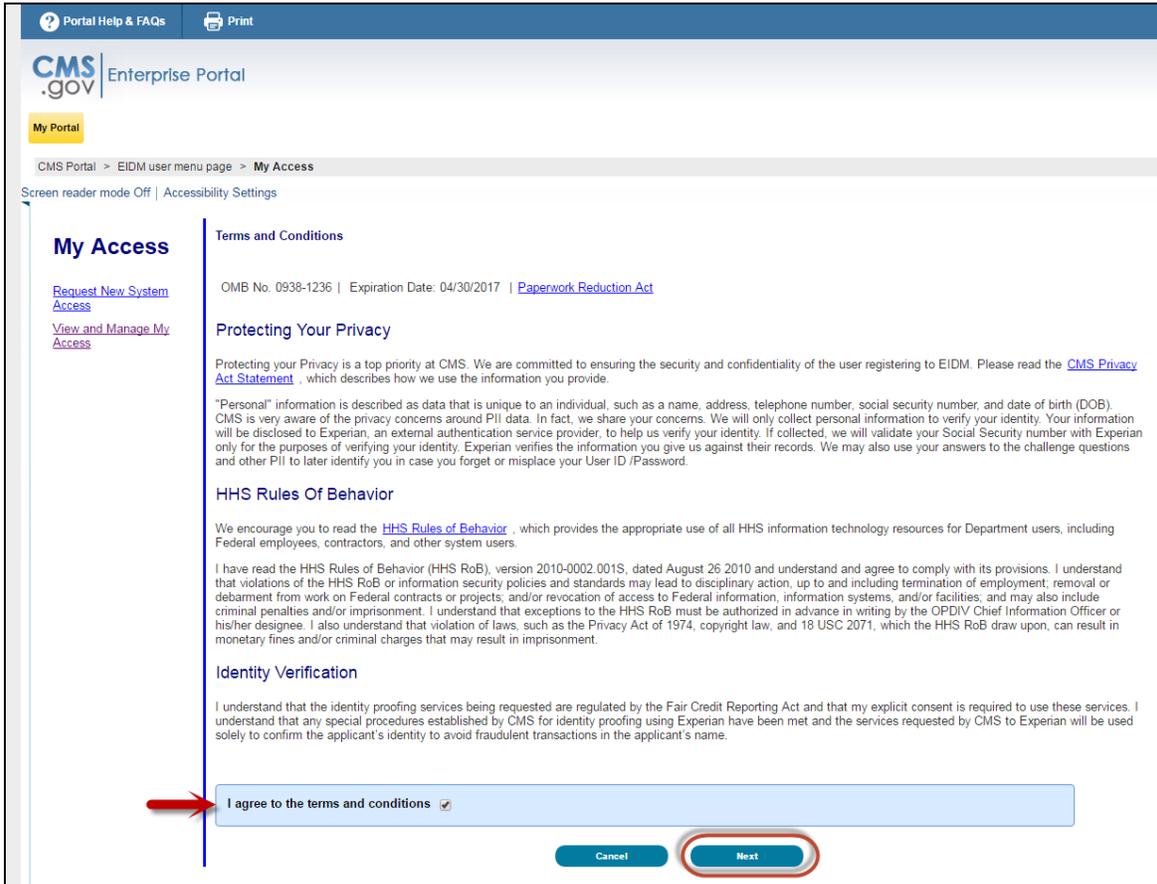
The screenshot shows the 'Request New System Access' page in the CMS Enterprise Portal. The page title is 'Request New System Access'. Below the title, there is a section for 'My Access' with links for 'Request New System Access' and 'View and Manage My Access'. The main content area contains instructions for requesting access, including a note about Identity Verification and Multi-Factor Authentication. The form has two dropdown menus: 'System Description' and 'Role'. The 'System Description' dropdown is set to 'OPENPAYMENTS-Open Payments A...' and the 'Role' dropdown is set to 'Applicable Manufacturer, GPO, Physic...'. Red arrows point to both dropdown menus. At the bottom, there are 'Cancel' and 'Submit' buttons, with the 'Submit' button circled in red.

Step 8: Once you have requested access to the Open Payments application, you will then be asked to review the identity verification information. Select the “Next” button once you have reviewed the information.

The screenshot shows the 'Identity Verification' page in the CMS Enterprise Portal. The page title is 'Identity Verification'. Below the title, there is a section for 'My Access' with links for 'Request New System Access' and 'View and Manage My Access'. The main content area contains instructions for completing Identity Verification, including a list of items to keep in mind. At the bottom, there are 'Cancel' and 'Next' buttons, with the 'Next' button circled in red.

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Step 9: Accept the Terms and Conditions by selecting the checkbox. Select the “Next” button.



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Step 10: Verify your information and make any updates as necessary. **Note:** Selecting the “Cancel” button will cause you to lose all data entered. Select “Next” when finished.

The screenshot shows the 'My Access' page in the CMS.gov Enterprise Portal. The page title is 'Your Information' and it includes a 'Verify Your Identity' link. The form contains the following fields and sections:

- First Name:** Text input field.
- Middle Name:** Text input field.
- Last Name:** Text input field.
- Suffix:** Dropdown menu.
- E-mail Address:** Text input field.
- Confirm E-mail Address:** Text input field.
- Social Security Number:** Three separate text input fields.
- Date of Birth:** Three separate text input fields.
- Address Selection:** Radio buttons for 'U.S. Home Address' (selected) and 'Foreign address'.
- Home Address Line 1:** Text input field.
- Home Address Line 2:** Text input field.
- City:** Text input field.
- State:** Dropdown menu.
- Zip Code:** Text input field.
- Zip Code Extension:** Text input field.
- Country:** Pre-filled with 'USA'.
- Primary Phone Number:** Text input field.

At the bottom of the form, there are two buttons: 'Cancel' and 'Next'. The 'Next' button is highlighted with a red oval.

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Step 11: Verify your identity by answering the identity proofing questions. The identity proofing questions are created by Experian based upon the information you entered during EIDM registration as well as information in Experian’s databases. Experian also performs a soft credit inquiry to verify your identity. Soft credit inquiries are visible only to the user and only appear on credit reports produced by Experian. Credit inquiries are not visible to lenders. If you order a credit report from Experian, you will see an entry of inquiry by the Centers for Medicare & Medicaid Services with CMS’s address and the date of request. **Identity proofing does not affect your credit score.** If you have questions about Experian’s verification process, please refer to Experian Customer Assistance at <http://www.experian.com/help/>.

Select the “Next” button when you have completed this page. **Note: Pressing the “Cancel” button will cause you to lose all data entered.**

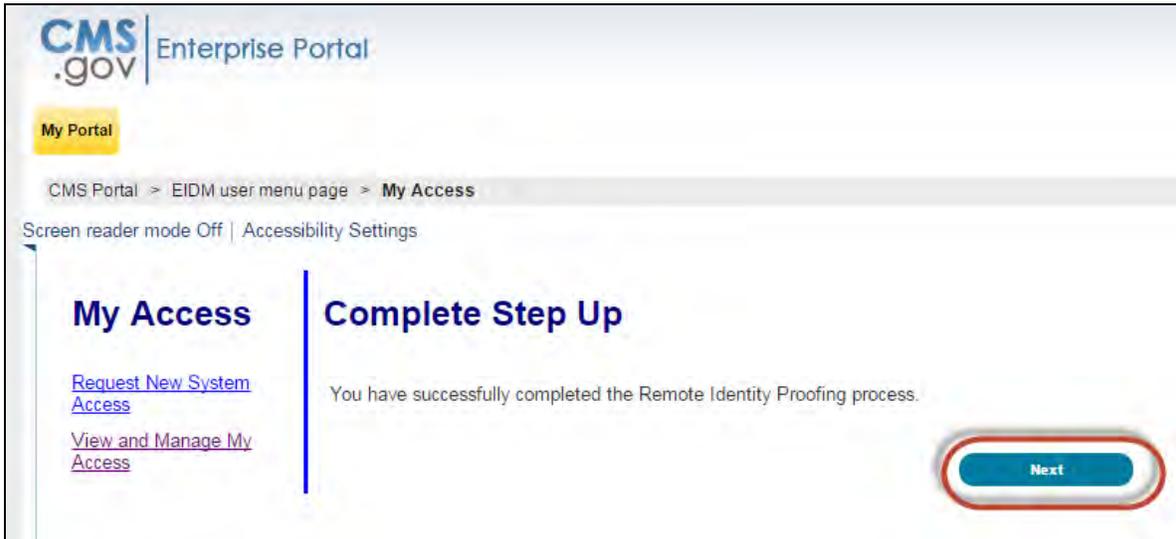
The screenshot displays the 'My Access' section of the CMS Enterprise Portal. The page title is 'My Access' and the breadcrumb trail is 'CMS Portal > EIDM user menu page > My Access'. The page content includes a 'Verify Identity' section with the following questions and radio button options:

- Verify Your Identity
- Your Information
- Verify Your Identity
- Please select the county for the address you provided.
- Please select the city that you have previously resided in.
- According to our records, you graduated from which of the following High Schools?
- Which of the following represents the last four digits of your cellular phone number?

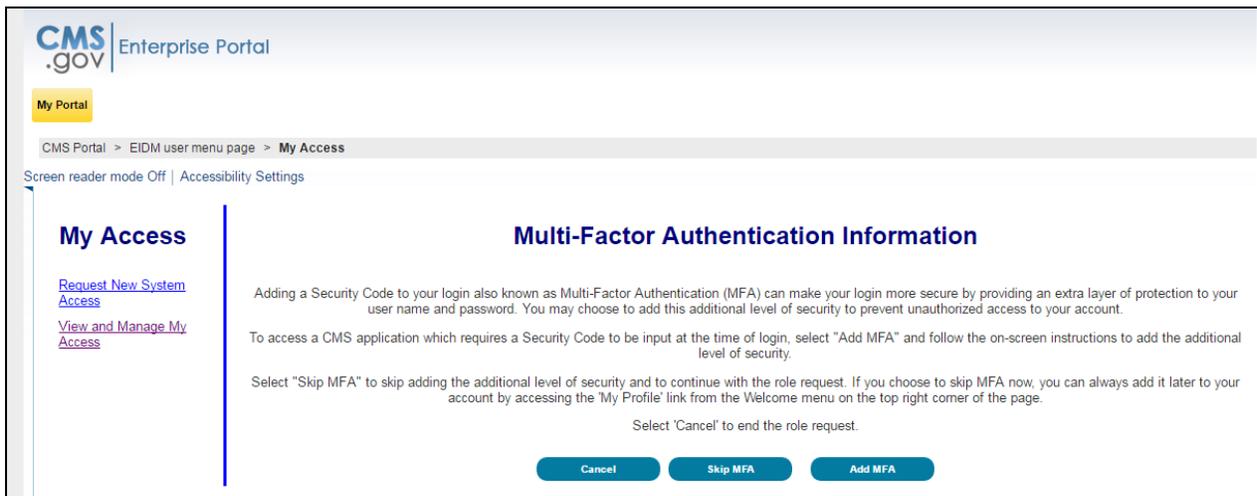
At the bottom of the page, there are two buttons: 'Cancel' and 'Next'. The 'Next' button is highlighted with a red oval.

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Step 11: You will receive an on-screen confirmation message that you have successfully completed the identity proofing process. Select “Next” to proceed.

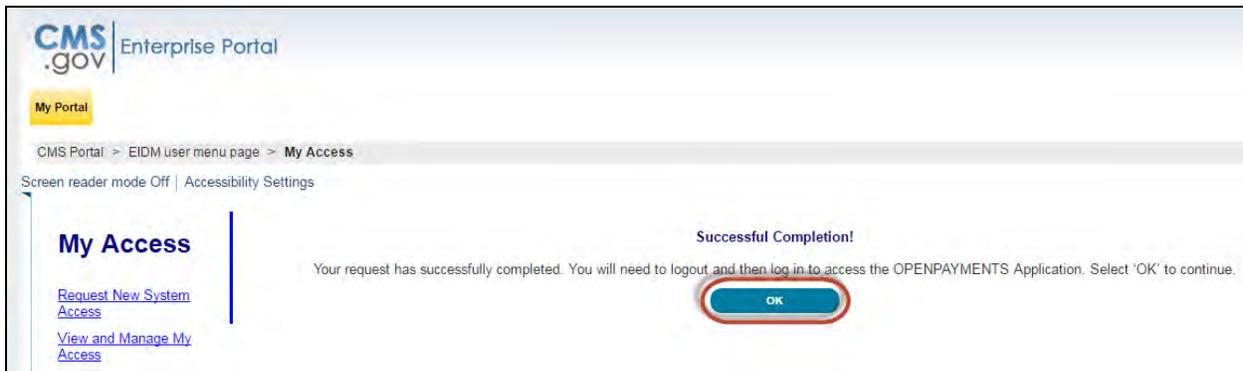
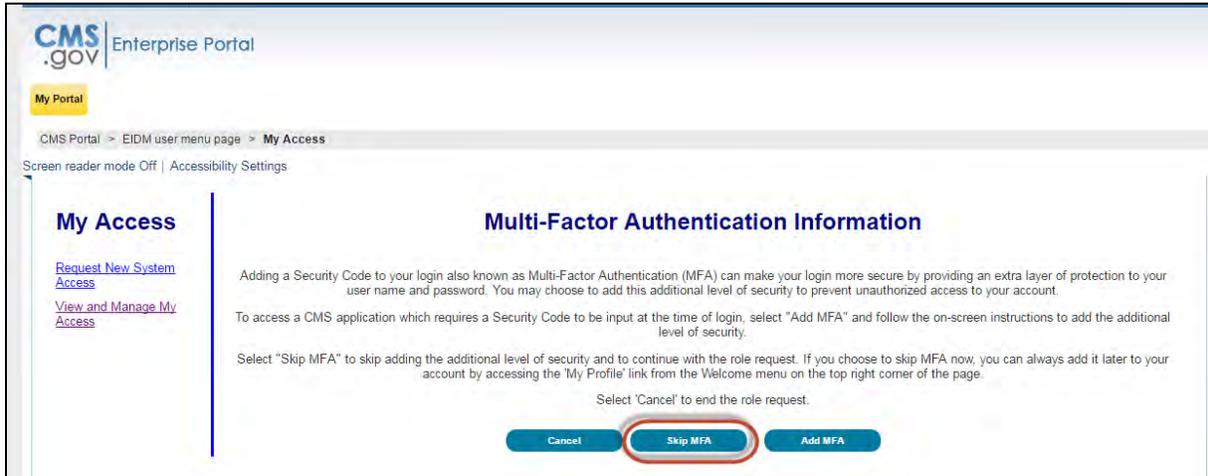


Step 12: You will now be taken to the Multi-Factor Authentication (MFA) Registration page. During the MFA registration process, you will have the option of registering a phone, computer, or email to add an additional level of security to your account. It is **not required** to complete this step to obtain access to the Open Payments system. You may also register the device(s) at a later time. Refer to the “CMS Enterprise Identity Management System (EIDM) User Operations Guide,” available at <https://portal.cms.gov> for more information on the MFA process.

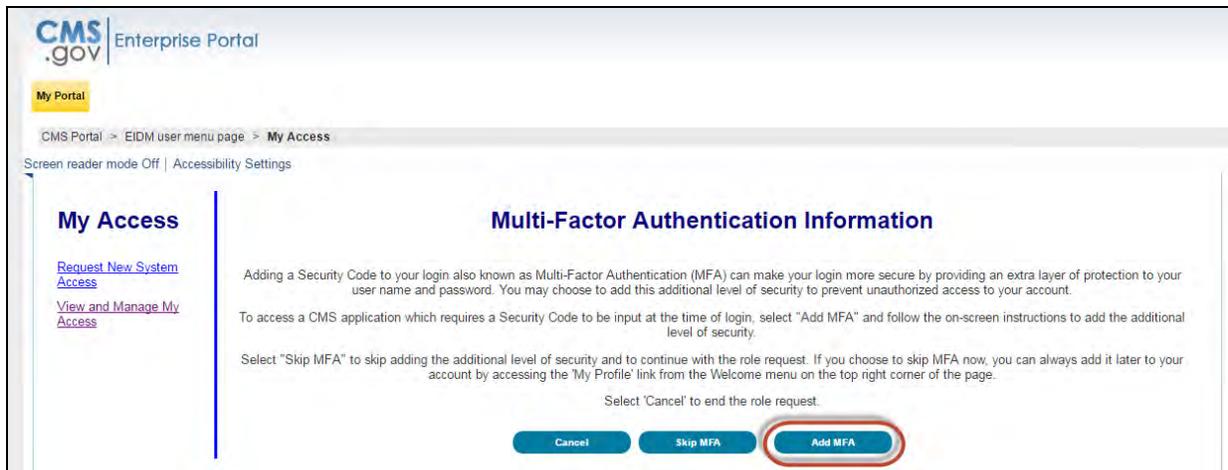


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Step 12a: To proceed without MFA, select “Skip MFA.” A confirmation screen will be displayed that you have successfully requested access to the Open Payments system. Access to the Open Payments system will be instantaneous. Nevertheless, after you register, you will need to log out of the Enterprise Portal and then log back in before the link to the Open Payments system will appear in the menu bar at the top.

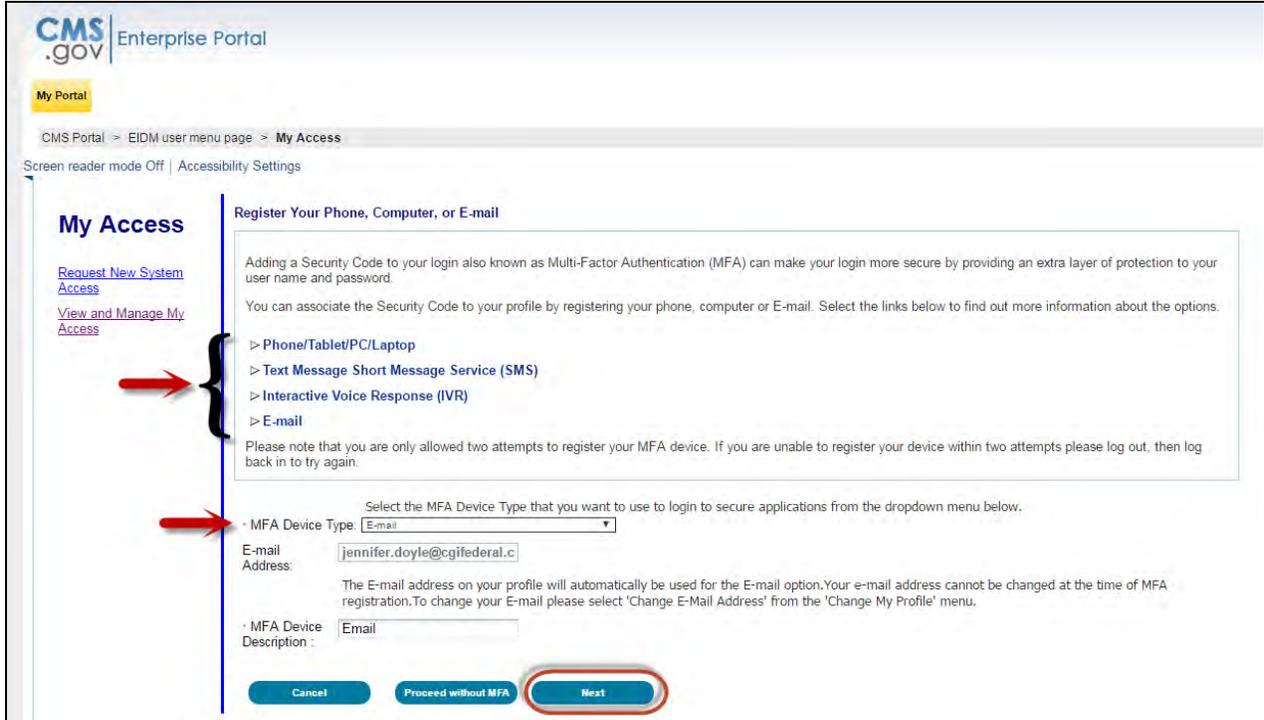


Step 12b: To proceed with MFA, select, “Add MFA.”

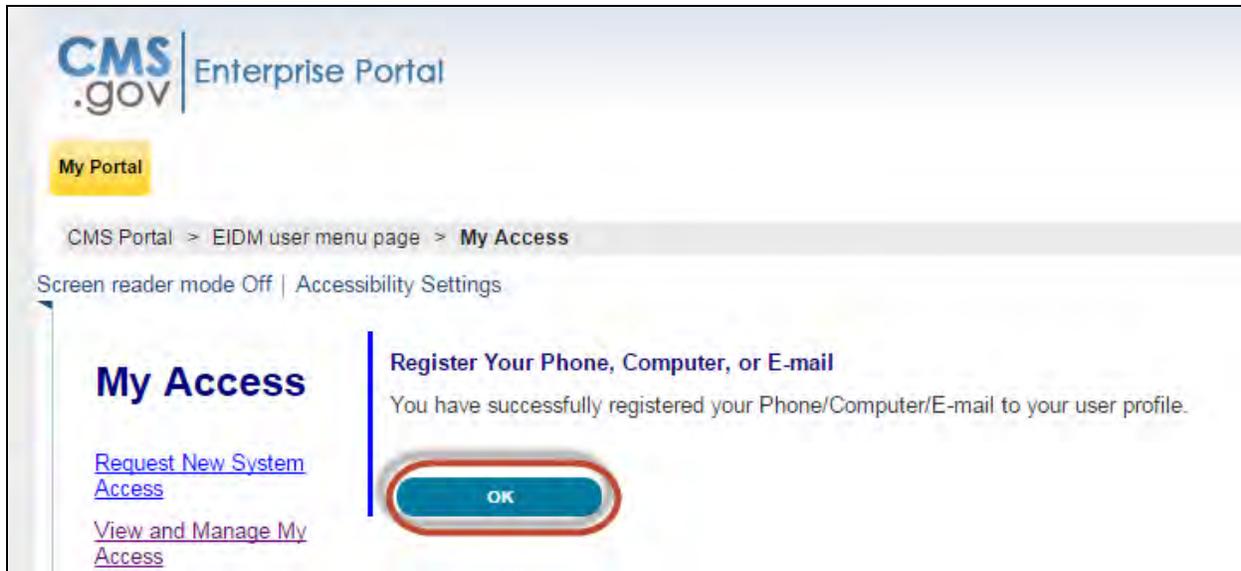


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Select the device you wish to register. Depending on the device you choose to register, you will be asked to provide information about that device. You may only register one device at this time. You can add additional devices later through your EIDM profile settings. Enter the required information for the device you are registering and select “Next” to continue.

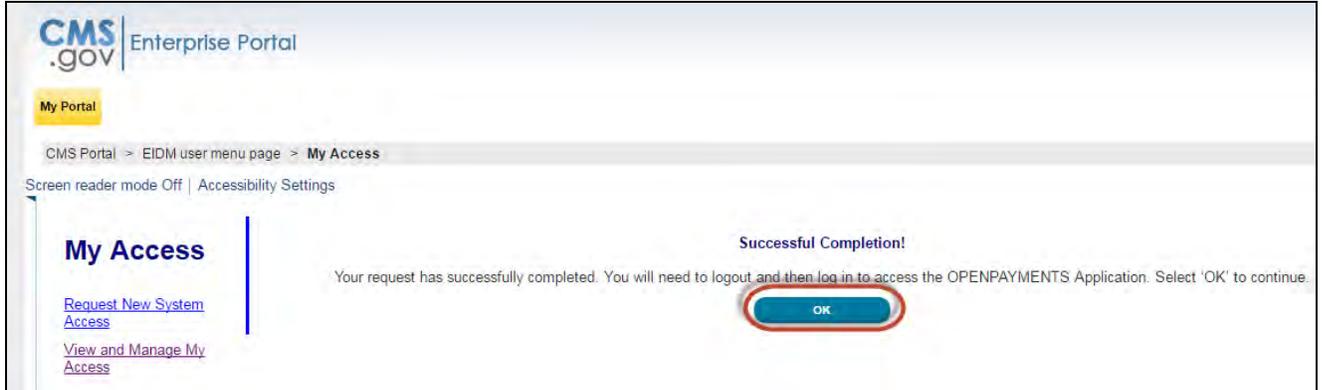


You will receive a confirmation that the MFA device you entered has been successfully registered. Select “OK” to continue.



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A confirmation screen will be displayed that you have successfully requested access to the Open Payments system. Access to the Open Payments application will be instantaneous. Nevertheless, after you register, you will need to log out of the Enterprise Portal and then log back in before the link to the Open Payments system will appear in the menu bar at the top.



Section 3.3 Registering Applicable Manufacturers and Applicable GPOs

Once your reporting entity has decided who should fill the required user roles, you can begin Open Payments registration. During registration, you will enter the required information for your reporting entity profile, user personal profile, and nominees for each user role. Reporting entity registration has five steps, as shown in **Figure 3.2**. Details on these steps are included later in this section.

Figure 3.2: Entity Registration



The authorized official enters all required information to create the entity’s profile. The authorized official should be highly placed within the entity(e.g., a Chief Executive Officer, Chief Financial Officer, Chief Compliance Officer, or other Officer of the applicable manufacturer or applicable GPO. Specific titles may vary depending on the management structure of the reporting entity.

During registration, the authorized official must select the user role of officer for him- or herself to complete the registration process. The entire registration process takes approximately 30 minutes and must be completed in a single session. Users cannot save partially completed entries for completion at a later time. Users will be able to edit, manage, or update a profile once it is created. Note that the system does not currently have an auto-save feature, and will time out after 30 minutes of inactivity.

Figure 3.3 and Figure 3.4 detail which fields are required and which fields are optional when creating an entity and user profile. It is important to have this information on-hand prior to beginning the registration process.

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Figure 3.3: Entity Profile Fields

Fields	Required or Optional?
Reporting Entity Type	Required
Reporting Entity Legal Name	Required
Business Type	Required
Doing Business As (DBA) Name	Required
Reporting Entity Business Address	Required
Reporting Entity Business Phone Number	Required
Reporting Entity Type of Ownership	Required
Taxpayer Identifier Number (TIN)/ Employer Identification Number (EIN)	Required
Dun & Bradstreet (D&B) Data Universal Numbering System (DUNS)	Optional
Food and Drug Administrator (FDA) Establishment Identifier (FEI)	Optional
Uniform Resource Locator (URL) of Parent Company*	Required
Consolidated Report Indicator (Y/N) (default N)	Required
Primary Point of Contact Name	Required
Primary Point of Contact Business Phone Number	Required
Primary Point of Contact Title at the Entity	Required
Primary Point of Contact Email Address	Required
Backup Point of Contact Name	Required
Backup Point of Contact Business Phone Number	Required
Backup Point of Contact Title at the Entity	Required
Backup Point of Contact Email Address	Required
Contact Information for Review and Dispute	Required

* If the reporting entity does not have a URL, enter the value <http://www.cms.gov> in the “Uniform Resource Locator (URL) of Parent Company” field.

Figure 3.4: User Profile Fields

Fields	Required or Optional?
First Name	Required
Middle Name	Optional
Last Name	Required
Name Suffix	Optional
Job Title	Required
Business Address	Required
Business Phone Number	Required
Email Address	Required

After submitting both the entity and user profiles, Open Payments will vet the entity to ensure it is a valid entity. See Section 3.7 for information on vetting. Users cannot perform any functions in the Open Payments system until the reporting entity has been successfully vetted and registered.

Important Notes:

- Registration for both the reporting entity and authorized official must be completed in one session.
- The Open Payments system will log out all users after 30 minutes of inactivity.
- Never use the navigation buttons on your browser toolbar. Only use the navigation buttons (i.e., “Back” button) within the Open Payments system itself.

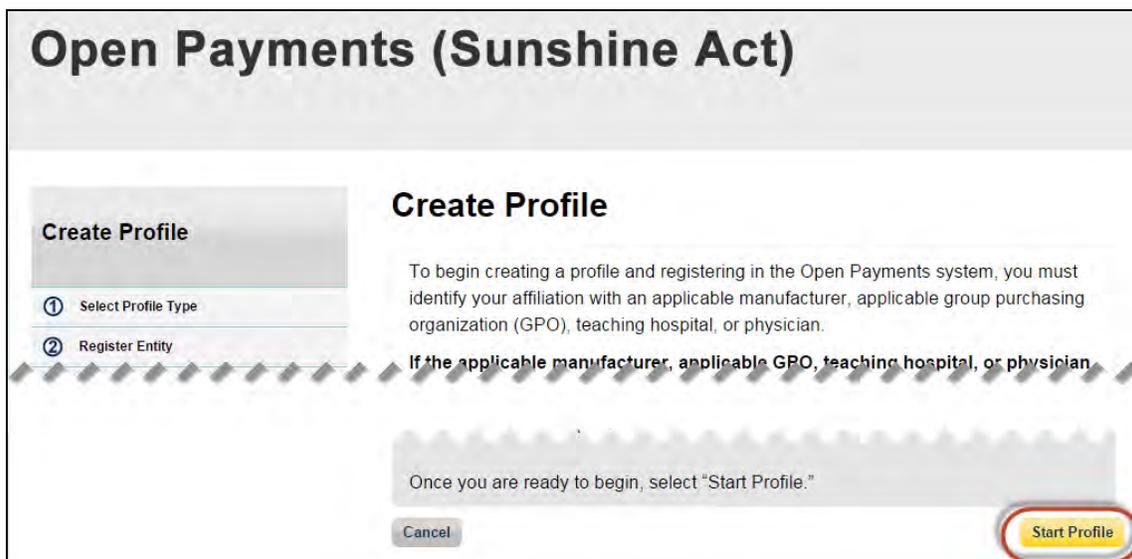
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3.3a: Registering a Reporting Entity (First-Time System Users)

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page. The on-screen text contains important information regarding the registration process. Read the on-screen text and select “Create My Profile” when you are ready to begin the registration process.



Step 2: The on-screen text contains important information regarding creating the reporting entity and individual profile. Read the on-screen text and select “Start Profile” at the bottom of the page when you are ready to continue.



Open Payments User Guide

Step 3: Select the profile type “Applicable manufacturer or applicable group purchasing organization (GPO)” and select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- 1 Select Profile Type
- 2 Register Entity
- 3 Personal Information
- 4 Review and Submit Profile

Select Profile Type

A field with an asterisk (*) is required.

If you do not have a registration ID and/or nomination ID, begin creating your profile by indicating below whether you are affiliated with an applicable manufacturer or applicable GPO, teaching hospital, or physician.

If you received a registration ID and/or nomination ID in an email notifying you of your nomination role, you may begin creating your profile by selecting the “I have a Registration ID and Nomination ID” link.

Note that if you wish to register as a physician authorized representative, you must have a nomination ID. You cannot nominate yourself for a physician authorized representative role.

If you are a physician that is affiliated with a teaching hospital, you should register yourself as a physician and not as a teaching hospital. Physicians can view records submitted about them only if they register themselves as physicians. Registering as a teaching hospital will allow you to view only records submitted about the teaching hospital. If you have any questions regarding the user type you should register as, please contact the Open Payments Help Desk (openpayments@cms.hhs.gov) for guidance.

***Required: Select the type of entity or covered recipient you are affiliated with OR the “I have a Registration and Nomination ID” link.**

- Applicable manufacturer or applicable group purchasing organization (GPO)
- Physician
- Teaching hospital

----- OR -----

[I have a Registration ID and Nomination ID](#)

Cancel Continue

Open Payments User Guide

Step 4: Once your entity type is selected, provide the reporting entity’s Taxpayer Identification Number/Employer Identification Number (TIN/EIN). This will be the reporting entity’s Employer Identification Number (EIN), a nine-digit number used by the entity for tax reporting. The format for the TIN/EIN is 99-9999999. Enter the reporting entity’s TIN/EIN in the space provided and select “Find.”

The screenshot shows the 'Open Payments (Sunshine Act)' interface. On the left is a 'Create Profile' sidebar with steps: Select Profile Type, Register Entity (highlighted), Personal Information, and Review and Submit Profile. Below this are links for the User Guide, Contact Us, and Privacy Policy. The main area is titled 'Entity Lookup' and contains instructions on how to search for an entity by TIN/EIN. At the bottom, there is a search form with a label '*Enter TIN/EIN:', a placeholder '99-9999999', an input field containing '45-6789012', and a 'Find' button. A red arrow points to the input field. 'Cancel' and 'Back' buttons are also visible.

Open Payments User Guide

Step 5: The system will perform a search for that TIN/EIN to determine if it has already been registered.

If the TIN/EIN returns a match, your reporting entity has already been registered. You may choose to proceed by nominating yourself for a role with that entity by selecting the reporting entity name, or you may select “Cancel” to exit entity registration. See Section 3.6d for instructions on how to complete the self-nomination process.

If no match is found for that TIN/EIN, you can proceed with registering that reporting entity. Select the “Register your Entity on Open Payments” hyperlink to continue with entity registration.

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- 2 Register Entity**
- 3 Personal Information
- 4 Review and Submit Profile

Entity Lookup

A field with an asterisk (*) is required.

Enter the entity's Taxpayer Identification Number (TIN)/Employer Identification Number (EIN) below to perform a search for any entities registered with the selected TIN/EIN.

If the TIN/EIN entered does not return any results, the entity has not yet been registered within the Open Payments system and you may proceed with registering the entity by selecting the "Register Your Entity on Open Payments" link.

The TIN/EIN search will return results if entities associated with TIN/EIN have been registered in the Open Payments system. If the list of entities returned does not contain the entity you wish to register with, you may proceed with registering the entity yourself by selecting "Other." If the list of entities returned contains the entity you wish to affiliate yourself with, you may select that entity and proceed with creating your profile and associating yourself with that entity.

Required: Enter the TIN/EIN you wish to be associated with.

*Enter TIN/EIN:
99-9999999
45-6789012 **Find**

No entity with that TIN/EIN is registered on Open Payments
[Register your Entity on Open Payments](#)

Cancel **Back**

Open Payments User Guide

Step 6: Enter the reporting entity's information. All required fields will be marked with an asterisk (*). Users will not be able to proceed with registration until all of the required fields have been entered. Take care to use proper field formatting required by the system. For example, when entering the entity phone number and Taxpayer Identification Number/Employer Identification Number (TIN/EIN), you must include the hyphen ("-") in the proper place within the field to pass field validation.

URL is also a required field. If the reporting entity you are registering does not have a website, enter the generic URL of <http://www.cms.gov> into this field. When you are done, select "Continue." Selecting the "Cancel" button will cause you to lose all data entered.

Additional Information on the fields for entity registration:

- The **Consolidated Report Indicator** indicates whether or not the applicable manufacturer or applicable GPO intends to submit a consolidated report. Consolidated reporting allows the reporting entity to submit bulk data files across multiple registered entities. Applicable manufacturers or applicable GPOs should select "yes" if another applicable manufacturer or applicable GPO under common ownership with the registering entity is submitting a report on its behalf. The option selected in the "Consolidated Report Indicator" is a system indicator only and does not commit the user to submitting a consolidated report. See Section 4.11 for more on consolidated reporting.
- The **Entity Business Type** indicates the type of applicable manufacturer or applicable GPO registering in the Open Payments system. Entities may select whether the type is any of the following:
 - **Applicable manufacturer**

If applicable manufacturer is selected, an entity must select one of the following business types:

 - applicable manufacturer-drugs/biologicals
 - applicable manufacturer-devices/medical supplies
 - applicable manufacturer-drugs/biologicals and devices/medical supplies
 - applicable manufacturer-physician-owned distributor
 - applicable manufacturer-hospital-owned distributor
 - applicable manufacturer-distributor/supplier (non-hospital, non-physician-owned)
 - **Applicable GPO**

If GPO is selected, an entity must select one of the following business types:

 - GPO-drugs/biologicals
 - GPO-devices/medical supplies
 - GPO- drugs/biologicals and devices/medical supplies
 - GPO-physician-owned

Open Payments User Guide

- GPO-hospital-owned
- GPO-hospital and physician-owned
- GPO-non-hospital, non-physician-owned
- GPO-government-owned
- The **Primary** and **Backup Points of Contact** are individuals who will serve as the points of contact for the reporting entity and CMS. These must be separate individuals. They do not have to be registered in the Open Payments system.
- The **Contact Information for Review and Dispute** field is to provide contact information for individual(s) from your entity who will assist with the dispute resolution process. You may also include additional instructions for physicians and teaching hospitals in this field. The contents of the “Contact Information” box will be visible on your entity’s profile page as well as the “Record ID” pages of all records the entity has submitted.

Open Payments User Guide

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Register Entity**
- Entity Information
- Personal Information
- Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? Contact us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Register Entity

A field with an asterisk (*) is required.

Complete the information below to create a profile for an applicable manufacturer or applicable GPO.

Entity's Legal Name:
EFGH Medical

Reporting Entity Type:
 Applicable Manufacturer
 Group Purchasing Organization

Business Type:
Applicable manufacturer-gpo (digital)

Food & Drug Administration (FDA) Establishment Identifier:
(This is a 10-digit number)

Data Universal Numbering System (D-U-N-S® Number):
(This is a 9-digit number)

URL of Parent Company:
http://www. or https://www. or www.

Business Address

Enter the business address below.

Country:
United States

Business Address, Line 1:
7500 Security Blvd

Business Address, Line 2:

City Name:
Baltimore

State:
Maryland

Zip Code:
21045 20901
21044

Business Telephone Number:
410-555-5555
555-555-5555

Business Ownership Information

Enter the business ownership information below.

Type of Ownership:
Corporation

Taxpayer Identifier Number (TIN)/Employer Identification Number (EIN):
94-2629588
45-678912

Doing Business As (DBA) Name:
EFGH Medical

Is this entity part of a consolidated report (e.g., where an entity is reporting on behalf of another entity)?

- Yes. The entity's data will be submitted in a consolidated report.
- No. The entity's data will not be submitted in a consolidated report.
- I don't know whether my entity's data will be submitted in a consolidated report.

Points of Contact

The two identified points of contact will receive all important notification emails. Note: Coloring or redaction on a point of contact does not register that individual in the Open Payments system. Individuals must be registered in the system if they want to access the Open Payments system.

Primary Point of Contact

Name:
Mary Smith

Business Telephone Number:
555-555-5555

Title at the Entity:
Manager

Business Email Address:
mmarysmith@efgh.com

Backup Point of Contact

Name:
John Miller

Business Telephone Number:
555-555-5555

Title at the Entity:
Dr. Manager

Business Email Address:
johnmiller@efgh.com

Contact Information for Review and Dispute

In this "Contact Information" tool, provide contact information for individuals from your entity who are assisting with the dispute resolution process. You may also include additional instructions for physicians and scanning hospitals.

Note that the contents of the "Contact Information" tool will be shared with all covered recipients you have reported payments or transfers of value for. The contents will be displayed exactly as entered in the tool.

Contact Information:
(Add individual contact information)

Please contact John Miller at 555-555-5555 or johnmiller@efgh.com for inquiries regarding disputes.

Cancel Back Continue

Open Payments User Guide

Step 7: Enter the required information and select your user roles. For a description of user roles, see Section 3.5. When registering a new reporting entity, you must select the role of officer for yourself. The system will not allow you to proceed if this role is not selected. You may also select the role of submitter and/or attester for yourself. When you are done, select “Continue.”

Note: Selecting the “Back” button will cause you to lose all data entered.

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ② Register Entity
 - ✓ Entity Information
 - Your Roles**
 - Nominate Additional Roles
- ③ Personal Information
- ④ Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Your Role

A field with an asterisk (*) is required.

To register an entity, you must be an authorized official within the entity and you must assume the officer role in the Open Payments system. The authorized official is a highly placed person within the entity, such as a Chief Executive Officer, Chief Financial Officer, Chief Compliance Officer, or other equivalent positions. Authorized representatives can be added now or at a later time. An entity may have a maximum of 10 active users, with 5 users in an officer role.

Officer:
Updates the applicable manufacturer or applicable GPO profile information and can approve and modify additional user roles.

Submitter:
Submits and edits payment information on behalf of the applicable manufacturer or applicable GPO. This can also be an individual from a third party entity submitting on behalf of the applicable manufacturer or applicable GPO.

Attester:
Attests to the accuracy, completeness, and timeliness of the data submitted for the applicable manufacturer or applicable GPO. During the attestation process, only the attester can submit assumptions made when reporting payments or other transfers of value, or ownership or investment interests.

Your first name and last name have been prepopulated from your CMS Enterprise Identity Management system (EIDM) profile. You may edit these fields as needed. However, changing this information in Open Payments will not change the corresponding information in your EIDM profile. Enter in your business email and business telephone number, select the role(s) you wish to hold, and select “Continue.”

*First Name: Middle Name:

*Last Name: Suffix (Jr., Sr., etc.):

*Business Email Address: *Business Telephone Number:

Indicate your role(s) in the Open Payments system. Only an officer may manage the access level of attesters and submitters.

Highest Level of Role

Officer

Reporting-related Roles

Submitter

Attester

Open Payments User Guide

Step 8: You may nominate additional individuals for the officer, submitter, and attester roles at this step. If you do not wish to nominate additional individuals, select “Continue.”

If you will not be fulfilling all three user roles, you must nominate at least one other individual to fill each of the remaining roles. **At least one individual must be identified for each of the three roles in the Open Payments system during initial entity registration.** The system will not allow you to proceed without at least one individual associated with each user role.

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ② Register Entity
 - ✓ Entity Information
 - ✓ Your Roles
 - Nominate Additional Roles**
 - ③ Personal Information
 - ④ Review and Submit Profile

Applicable Manufacturer or Applicable GPO: Nominate Additional Roles

A field with an asterisk (*) is required.

To register an entity, you must be an authorized official within the entity and you must assume the officer role in the Open Payments system. The authorized official is a highly placed person within the entity, such as a Chief Executive Officer, Chief Financial Officer, Chief Compliance Officer, or other equivalent positions. Authorized representatives can be added now or at a later time. An entity may have a maximum of 10 active users, with 5 users in an officer role.

Officer:
Updates the applicable manufacturer or applicable GPO profile information and can approve and modify additional user roles.

Submitter:
Submits and edits payment information on behalf of the applicable manufacturer or applicable GPO. This can also be an individual from a third party entity submitting on behalf of the applicable manufacturer or applicable GPO.

Attester:
Attests to the accuracy, completeness, and timeliness of the data submitted for the applicable manufacturer or applicable GPO. During the attestation process, only the attester can submit assumptions made when reporting payments or other transfers of value, or ownership or investment interests.

Role:	First Name:	Last Name:	Business Email Address:	Business Telephone Number:	Actions:
Officer, Submitter, Attester	Karen	Miller	openpayments@yopmail.com	555-555-5555	(YOU)

Add

Cancel **Back** **Continue**

Access the Open Payments User Guide

Need help with the website? **Contact Us** by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 9: To add a nominee, select “Add.” The page will expand to show nominee information fields that will need to be completed. Fill in the information for the individual being nominated. Once you are done, select the “Add” button at the bottom of the page again.

Note: Selecting the “Back” button will cause you to lose all data entered.

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Register Entity
 - Entity Information
 - Your Roles
 - Nominee Additional Roles**
- Personal Information
- Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Applicable Manufacturer or Applicable GPO: Nominate Additional Roles

A field with an asterisk (*) is required

To register an entry, you must be an authorized official within the entity and you must assume the officer role in the Open Payments system. The authorized official is a highly placed person within the entity, such as a Chief Executive Officer, Chief Financial Officer, Chief Compliance Officer, or other equivalent positions. Authorized representatives can be added now or at a later time. An entity may have a maximum of 10 active users, with 5 users in an officer role.

Officer:
Updates the applicable manufacturer or applicable GPO profile information and can approve and modify additional user roles.

Submitter:
Submits and edits payment information on behalf of the applicable manufacturer or applicable GPO. This can also be an individual from a third party entity submitting on behalf of the applicable manufacturer or applicable GPO.

Attester:
Attests to the accuracy, completeness, and timeliness of the data submitted for the applicable manufacturer or applicable GPO. During the attestation process, only the attester can submit assumptions made when reporting payments or other transfers of value, or ownership or investment interests.

Role:	First Name:	Last Name:	Business Email Address:	Business Telephone Number:	Actions:
Officer, Submitter, Attester	Karen	Miller	openpayments@yopmail.com	555-555-5555	(YOU)

Nominee Information

Enter the user's personal information and the corresponding role for which they are being nominated. When completed select the "Add" button. Repeat this for all users you wish to nominate.

*First Name: Tom Middle Name:

*Last Name: Smith Suffix (Jr., Sr., etc.):

*Business Email Address: openpayments@yopmail.com *Business Telephone Number: 999-999-9999
555-555-5555

*Indicate the role or roles this person will have:

- Officer
- Submitter
- Attester

Business Address:

Business Address, Line 1:

Business Address, Line 2:

City Name: State: Please Select

Zip Code: 00000-9999

Cancel Add

Cancel Back Continue

Open Payments User Guide

This will add the nominee information to the reporting entity's profile, as well as open another set of nominee information fields to enter an additional nominee. Repeat the process until you have entered all individuals you wish to nominate at this time. An entity can have up to 10 unique users with a maximum of five holding the role of officer. Note that individuals can be nominated for user roles after entity registration is complete.

The page will display a summary of all of the individuals being nominated for user roles for this reporting entity. Once you have entered all nominations you wish to include at this time, select "Continue."

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ② Register Entity
 - ✓ Entity Information
 - ✓ Your Roles
 - Nominate Additional Roles**
- ③ Personal Information
- ④ Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Applicable Manufacturer or Applicable GPO: Nominate Additional Roles

A field with an asterisk (*) is required.

Confirmation: Your nominee has been successfully added.

To register an entity, you must be an authorized official within the entity and you must assume the officer role in the Open Payments system. The authorized official is a highly placed person within the entity, such as a Chief Executive Officer, Chief Financial Officer, Chief Compliance Officer, or other equivalent positions. Authorized representatives can be added now or at a later time. An entity may have a maximum of 10 active users, with 5 users in an officer role.

Officer:
Updates the applicable manufacturer or applicable GPO profile information and can approve and modify additional user roles.

Submitter:
Submits and edits payment information on behalf of the applicable manufacturer or applicable GPO. This can also be an individual from a third party entity submitting on behalf of the applicable manufacturer or applicable GPO.

Attester:
Attests to the accuracy, completeness, and timeliness of the data submitted for the applicable manufacturer or applicable GPO. During the attestation process, only the attester can submit assumptions made when reporting payments or other transfers of value, or ownership or investment interests.

Role:	First Name:	Last Name:	Business Email Address:	Business Telephone Number:	Actions:
Officer, Submitter, Attester	Karen	Miller	openpayments@yopmail.com	555-555-5555	(YOU)
Submitter, Attester	Tom	Smith	openpayments@yopmail.com	555-555-5555	Edit Delete

[Add](#)

[Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

Step 10: Review any pre-populated information for accuracy and enter other personal information. Required fields are marked with an asterisk (*). Users will not be able to proceed with registration until all of the required fields have been completed. Once your personal information has been entered, select “Continue.”

Note: Selecting the “Back” button will cause you to lose all data entered.

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ✓ Register Entity
- ③ **Personal Information**
- ④ Review and Submit Profile

- ➔ Access the Open Payments User Guide
- 🔍 Need help with the website? **Contact Us** by email
- 🔒 Review the Open Payments Privacy Policy [PDF, 102 KB]

Enter Personal Information

A field with an asterisk (*) is required.

Add the following personal and business information to your user profile. Your first name and last name have been prepopulated from your CMS Enterprise Identity Management system (EIDM) profile. You may edit the prepopulated fields as needed. However, changing this information in Open Payments will not change the corresponding information in your EIDM profile. Once completed, select “Continue.”

Your Name

*First Name: Karen	*Last Name: Miller
Middle Name: 	Suffix (Jr., Sr., etc.):

Your Business Contact Information

Enter your business or entity information.

*Business Email Address: openpayments@yopmail.com	*Business Telephone Number: 999-999-9999 555-555-5555
*Job Title: Director	
*Business Address, Line 1: 7500 Security Blvd	
Business Address, Line 2: 	
*City Name: Baltimore	*State: Maryland
*Zip Code: 99999 9999 21244	

Cancel Back **Continue**

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Open Payments User Guide

Step 11: Review the information entered for your reporting entity and personal profile. Select the “Back” button at the bottom of the page to go back and edit any information. Once you have reviewed the information and determined it to be correct, select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Register Entity
- Personal Information
- Review and Submit Profile**
- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Review and Submit Profile

Review the information on this page to ensure it is correct. Select “Back” to navigate to the previous pages to correct any invalid information. Select “Continue” to submit your profile.

Entity’s Legal Name: EFGH Medical

Reporting Entity Type: Applicable Manufacturer

Business Type: Applicable manufacturer-drugs/biological

Food & Drug Administration (FDA) Establishment Identifier:

Data Universal Numbering System (D-U-N-S® Number):

URL of Parent Company: www.cms.gov

Business Address:

Country: United States

Business Address, Line 1: 7500 Security Blvd

Business Address, Line 2:

City Name: Baltimore

State: Maryland

Zip Code: 21244

Business Telephone Number: 555-555-5555

Business Ownership Information

Type of Ownership: Corporation

Taxpayer Identifier Number (TIN)/Employer Identification Number (EIN): 45-6789012

Doing Business As (DBA) Name: EFGH Medical

Is this entity part of a consolidated report (e.g., where an entity is reporting on behalf of another entity)?

No, my entity’s data will not be submitted in a consolidated report

Points of Contact

The two identified points of contact will receive all important notification emails. Note: Entering an individual as a point of contact does not register that individual in the Open Payments system. Individuals must be registered in the system if they want to access the Open Payments system.

Primary Point of Contact

Name: Mary Smith **Business Telephone Number:** 555-555-5555

Title at the Entity: Manager **Business Email Address:** openpayments@yopmail.com

Backup Point of Contact

Name: John Miller **Business Telephone Number:** 555-555-5555

Title at the Entity: Sr. Manager **Business Email Address:** openpayments@yopmail.com

Contact Information for Review and Dispute

Contact Information:
Please contact John Miller at 555-555-5555 or openpayments@yopmail.com for inquiries regarding disputes.

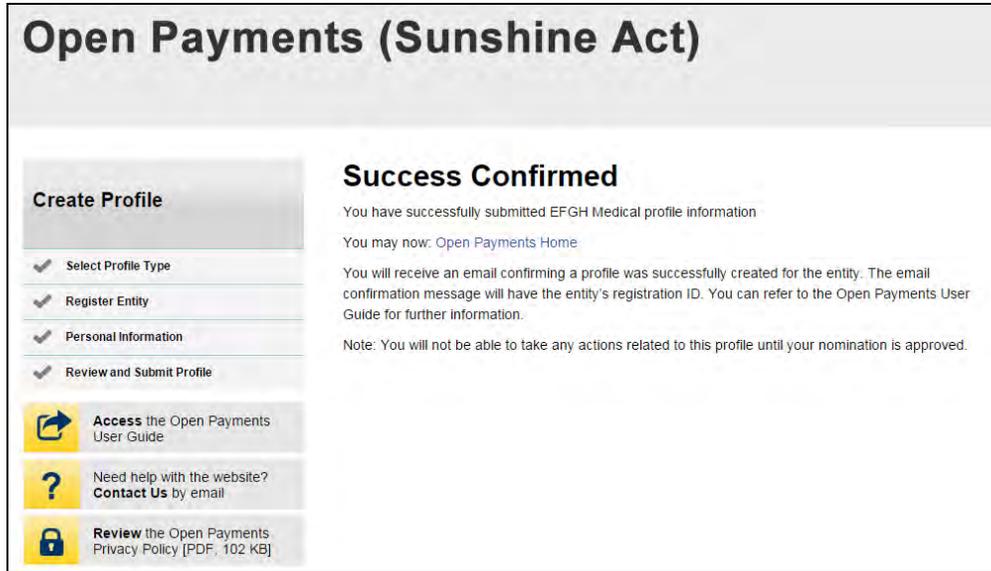
Nominations:

Role:	First Name:	Last Name:	Middle Name:	Suffix (Jr., Sr., etc.):	Business Email Address:
Officer, Submitter, Attester	Karen	Miller			openpayments@yopmail.com
Submitter, Attester	Tom	Smith			openpayments@yopmail.com

[Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

The following message will appear on-screen to confirm your reporting entity and personal profile have been successfully created. An email notification with the entity's registration ID will be sent to you, the individuals you nominated for user roles during registration, and the individuals listed as points of contact for the reporting entity.



After both the reporting entity profile and officer profile are created, the Open Payments system vets the reporting entity based on the information provided in the entity profile. An overview of the vetting process can be found in Section 3.7.

If the reporting entity's registration is successful, Open Payments will send an email notification to the officer(s) as well as the primary and backup points of contact. This email will state that the entity has been successfully registered. Users will be able to access the entity's profile in the Open Payments system and begin performing their tasks.

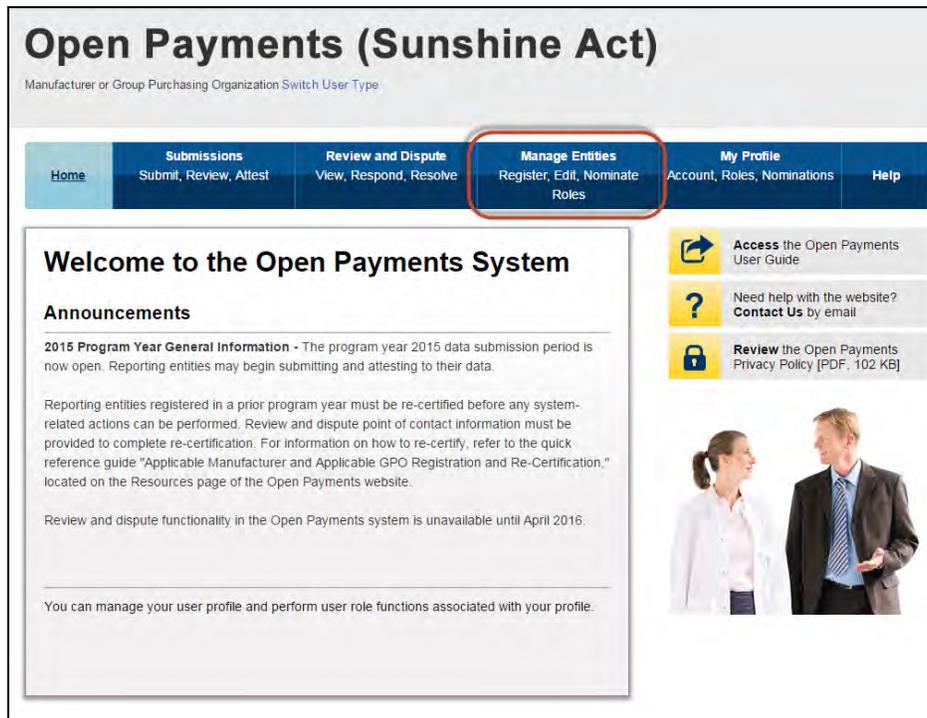
If the reporting entity's registration is unsuccessful, Open Payments will send an email notification to the officer(s) and points of contact stating the entity could not be successfully verified and registered. Contact the Open Payments Help Desk at openpayments@cms.hhs.gov or 1-855-326-8366 for assistance.

Open Payments User Guide

3.3b: Registering an Entity (Returning System Users)

If you already have access to the Open Payments system and wish to register a new reporting entity with the system, follow these steps:

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page. Select the “Manage Entities” tab from the menu bar on the Open Payments landing page.



Open Payments User Guide

Step 2: Select "Register New Entity."

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization [Switch User Type](#)

- Home
- Submissions
Submit, Review, Attest
- Review and Dispute
View, Respond, Resolve
- Manage Entities
[Register](#), [Edit](#), [Nominate](#)
[Roles](#)
- My Profile
Account, Roles, Nominations
- Help

Manage Entities

[Register New Entity](#)

The entities you are authorized to view are listed below. Select an entity from the list below to view the entity details and manage user roles affiliated with the entity.

If an entity is pending recertification, you must complete recertification before performing any system action for that entity. Entity recertification requires that an active officer within the Open Payments system reviews, updates (as necessary), and confirms all of the entity details submitted during the previous program year.

Your Entities

Name:	Registration ID:	Status:	Date Verified:
ABCDE Medical	100000205014	Vetted	12/10/2015 15:25:06

- Access the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]



Open Payments User Guide

Step 3: Select the profile type “Applicable manufacturer or applicable group purchasing organization (GPO)” and select “Continue.”

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home **Submissions** (Submit, Review, Attest) **Review and Dispute** (View, Respond, Resolve) **Manage Entities** (Register, Edit, Nominate Roles) **My Profile** (Account, Roles, Nominations) **Help**

Create Profile

- 1 Select Profile Type
- 2 Register Entity
- 3 Personal Information
- 4 Review and Submit Profile

Select Profile Type

A field with an asterisk (*) is required.

If you do not have a registration ID and/or nomination ID, begin creating your profile by indicating below whether you are affiliated with an applicable manufacturer or applicable GPO, teaching hospital, or physician.

If you received a registration ID and/or nomination ID in an email notifying you of your nomination role, you may begin creating your profile by selecting the "I have a Registration ID and Nomination ID" link.

Note that if you wish to register as a physician authorized representative, you must have a nomination ID. You cannot nominate yourself for a physician authorized representative role.

If you are a physician that is affiliated with a teaching hospital, you should register yourself as a physician and not as a teaching hospital. Physicians can view records submitted about them only if they register themselves as physicians. Registering as a teaching hospital will allow you to view only records submitted about the teaching hospital. If you have any questions regarding the user type you should register as, please contact the Open Payments Help Desk (openpayments@cms.hhs.gov) for guidance.

***Required: Select the type of entity or covered recipient you are affiliated with OR the "I have a Registration and Nomination ID" link.**

- Applicable manufacturer or applicable group purchasing organization (GPO)
- Physician
- Teaching hospital

----- OR -----

[I have a Registration ID and Nomination ID](#)

Open Payments User Guide

Step 4: Once your entity type is selected, provide the reporting entity's Taxpayer Identification Number/Employer Identification Number (TIN/EIN). This will be the entity's Employer Identification Number (EIN), a nine-digit number used by the entity for tax reporting. The format for the TIN/EIN is 99-9999999. Enter the entity's TIN/EIN in the space provided and select "Find."

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home **Submissions** (Submit, Review, Attest) **Review and Dispute** (View, Respond, Resolve) **Manage Entities** (Register, Edit, Nominate, Roles) **My Profile** (Account, Roles, Nominations) **Help**

Create Profile

- Select Profile Type
- 2 Register Entity**
- 3 Personal Information
- 4 Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? **Contact Us** by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Entity Lookup

A field with an asterisk (*) is required.

Enter the entity's Taxpayer Identification Number (TIN)/Employer Identification Number (EIN) below to perform a search for any entities registered with the selected TIN/EIN.

If the TIN/EIN entered does not return any results, the entity has not yet been registered within the Open Payments system and you may proceed with registering the entity by selecting the "Register Your Entity on Open Payments" link.

The TIN/EIN search will return results if entities associated with TIN/EIN have been registered in the Open Payments system. If the list of entities returned does not contain the entity you wish to register with, you may proceed with registering the entity yourself by selecting "Other." If the list of entities returned contains the entity you wish to affiliate yourself with, you may select that entity and proceed with creating your profile and associating yourself with that entity.

Required: Enter the TIN/EIN you wish to be associated with.

***Enter TIN/EIN:**
99-9999999
23-4567890 **Find**

Cancel Back

Open Payments User Guide

Step 5: The system will perform a search for that TIN/EIN to determine if it has already been registered.

If the TIN/EIN returns a match, your reporting entity has already been registered. You may choose to proceed by nominating yourself for a role with that reporting entity by selecting the entity name, or you may select “Cancel” to exit entity registration. See Section 3.6d for instructions on how to complete the self-nomination process.

If no match is found for that TIN/EIN, you can proceed with registering that entity. Select “Register your Entity on Open Payments” to continue with reporting entity registration.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

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Entity Lookup

A field with an asterisk (*) is required.

Enter the entity's Taxpayer Identification Number (TIN)/Employer Identification Number (EIN) below to perform a search for any entities registered with the selected TIN/EIN.

If the TIN/EIN entered does not return any results, the entity has not yet been registered within the Open Payments system and you may proceed with registering the entity by selecting the "Register Your Entity on Open Payments" link.

The TIN/EIN search will return results if entities associated with TIN/EIN have been registered in the Open Payments system. If the list of entities returned does not contain the entity you wish to register with, you may proceed with registering the entity yourself by selecting "Other." If the list of entities returned contains the entity you wish to affiliate yourself with, you may select that entity and proceed with creating your profile and associating yourself with that entity.

Required: Enter the TIN/EIN you wish to be associated with.

*Enter TIN/EIN:
99-9999999
23-4567890 **Find**

No entity with that TIN/EIN is registered on Open Payments

Register your Entity on Open Payments

Cancel **Back**

Open Payments User Guide

Step 6: Enter the reporting entity information. All required fields will be marked with an asterisk (*). Users will not be able to proceed with registration unless all of the required fields have been completed.

Also, take care to use proper field formatting required by the system. For example, when entering the reporting entity phone number and Taxpayer Identification Number/Employer Identification Number (TIN/EIN), you must include the hyphen ("-") in the proper place within the field to pass field validation.

The URL is also a required field. If the reporting entity you are registering does not have a website, enter the URL of <http://www.cms.gov> into the field.

When you are done, select "Continue." Selecting the "Back" button will cause you to lose all data entered.

Additional Information on the fields for entity registration:

- The **Consolidated Report Indicator** indicates whether or not the applicable manufacturer or applicable GPO intends to submit a consolidated report. Consolidated reporting allows the reporting entity to submit bulk data files across multiple registered entities. Applicable manufacturers or applicable GPOs should select "yes" if another applicable manufacturer or applicable GPO under common ownership with the registering entity is submitting a report on its behalf. The option selected in the "Consolidated Report Indicator" is a system indicator only and does not commit the user to submitting a consolidated report. See Section 4.11 for more on consolidated reporting.
- The **Entity Business Type** indicates the type of applicable manufacturer or applicable GPO registering in Open Payments. Entities may select whether the type is any of the following:
 - **Applicable manufacturer**

If applicable manufacturer is selected, an entity must select one of the following business types:

 - applicable manufacturer-drugs/biologicals
 - applicable manufacturer-devices/medical supplies
 - applicable manufacturer-drugs/biologicals and devices/medical supplies
 - applicable manufacturer-physician-owned distributor
 - applicable manufacturer-hospital-owned distributor
 - applicable manufacturer-distributor/supplier (non-hospital, non-physician-owned)
 - **Applicable GPO**

If GPO is selected, an entity must select one of the following business types:

 - GPO-drugs/biologicals
 - GPO-devices/medical supplies
 - GPO- drugs/biologicals and devices/medical supplies
 - GPO-physician-owned

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- GPO-hospital-owned
- GPO-hospital and physician-owned
- GPO-non-hospital, non-physician-owned
- GPO-government-owned
- The **Primary** and **Backup Points of Contact** are individuals who will serve as the points of contact for the reporting entity and CMS. These must be separate individuals. They do not have to be registered in the Open Payments system.
- The **Contact Information for Review and Dispute** is to provide contact information for individual(s) from your entity who are assisting with the dispute resolution process. You may also include additional instructions for physicians and teaching hospitals. The contents of the “Contact Information” box will be visible on your entity’s profile page as well as the “Record ID” pages of all records the entity has submitted.

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Manufacturer or Group Purchasing Organization (GPO) User Tool

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- Review the Open Payments Privacy Policy (PDF, 152 KB)

Register Entity

A field with an asterisk (*) is required.
Complete the information below to create a profile for an applicable manufacturer or applicable GPO.

Entity's Legal Name:
AEOG Pharmaceuticals

Reporting Entity Type:
 Applicable Manufacturer
 Group Purchasing Organization

Business Type:
Applicable manufacturer/pharmaceutical

Food & Drug Administration (FDA) Establishment Identifier:
This is a 12-digit number.

Data Universal Numbering System (DUNS®) Number:
This is a 9-digit number.

URL of Parent Company:
URL, name or SBN, phone or email
www.aeo.com

Business Address
Enter the business address below.

Country:
United States

Business Address, Line 1:
1000 Security Blvd

Business Address, Line 2:

City Name:
Dartmouth

State:
Maine

Zip Code:
05505 0000
21244

Business Telephone Number:
555.555.5555
555.555.5555

Business Ownership Information
Enter the business ownership information below.

Type of Ownership:
Corporation

Taxpayer Identifier Number (TIN)/Employer Identification Number (EIN):
00-0000000
23-8567890

Doing Business As (DBA) Name:
AEOG Pharmaceuticals

Is this entity part of a consolidated report (i.e., when an entity is reporting on behalf of another entity)?
 Yes, my entity's data will be submitted in a consolidated report.
 No, my entity's data will not be submitted in a consolidated report.
I don't know whether my entity's data will be submitted in a consolidated report.

Points of Contact
The non-designated points of contact receive all important notifications emails. When notifying an individual as a point of contact does not require that individual in the Open Payments system. Individuals must be registered in the system if they want to access the Open Payments system.

Primary Point of Contact

Name: Joe Smith
Business Telephone Number: 555-555-5555
Business Email Address: joe.smith@aeo.com

Title at the Entity: Manager

Backup Point of Contact

Name: Mary Davis
Business Telephone Number: 555-555-5555
Business Email Address: mary.davis@aeo.com

Title at the Entity: Sr. Manager

Contact Information for Review and Dispute
In the "Contact Information" box below, provide contact information for individuals from your entity who are assisting with the dispute resolution process. You may also include additional instructions for dispute item and tracking inquiries.
Note that the contents of the "Contact Information" box will be shared with all covered recipients you have reported payments or transfers of value for. This content will be displayed exactly as entered in the box.

Contact Information:
555-555-5555
PLEASE CONTACT ANY PARTS AT 555-555-5555 OR apayment@openfda.gov FOR DISPUTES REGARDING DISPUTES.

Cancel Back Continue

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Step 7: Enter the required information and select your user roles. For a description of user roles, see Section 3.5. When registering a new reporting entity, you must select the role of officer for yourself. The system will not allow you to proceed if this role is not selected. You may also select the role of submitter and/or attester for yourself. When you are done, select “Continue.”

Note: Selecting the “Back” button will cause you to lose all data entered.

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Manufacturer or Group Purchasing Organization [Switch User Type](#)

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- Review the Open Payments Privacy Policy [PDF, 102 KB]

Your Role

A field with an asterisk (*) is required.

To register an entity, you must be an authorized official within the entity and you must assume the officer role in the Open Payments system. The authorized official is a highly placed person within the entity, such as a Chief Executive Officer, Chief Financial Officer, Chief Compliance Officer, or other equivalent positions. Authorized representatives can be added now or at a later time. An entity may have a maximum of 10 active users, with 5 users in an officer role.

Officer:
Updates the applicable manufacturer or applicable GPO profile information and can approve and modify additional user roles.

Submitter:
Submits and edits payment information on behalf of the applicable manufacturer or applicable GPO. This can also be an individual from a third party entity submitting on behalf of the applicable manufacturer or applicable GPO.

Attester:
Attests to the accuracy, completeness, and timeliness of the data submitted for the applicable manufacturer or applicable GPO. During the attestation process, only the attester can submit assumptions made when reporting payments or other transfers of value, or ownership or investment interests.

Your first name and last name have been prepopulated from your CMS Enterprise Identity Management system (EIDM) profile. You may edit these fields as needed. However, changing this information in Open Payments will not change the corresponding information in your EIDM profile. Enter in your business email and business telephone number, select the role(s) you wish to hold, and select “Continue.”

*First Name: <input type="text" value="Susan"/>	Middle Name: <input type="text"/>
*Last Name: <input type="text" value="Jones"/>	Suffix (Jr., Sr., etc.): <input type="text"/>
*Business Email Address: <input type="text" value="openpayments@yopmail.com"/>	*Business Telephone Number: 999-999-9999 <input type="text" value="555-555-5555"/>

Indicate your role(s) in the Open Payments system. Only an officer may manage the access level of attesters and submitters.

Highest Level of Role

Officer

Reporting-related Roles

Submitter

Attester

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Step 8: You may nominate additional individuals for the officer, submitter, and attester roles at this step. If you do not wish to nominate additional individuals, select “Continue.”

If you will not be fulfilling all three user roles, you must nominate at least one other individual to fill each of the remaining roles. **At least one individual must be identified for each of the three roles in the Open Payments system during initial entity registration.** The system will not allow you to proceed without at least one individual associated with each user role.

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 - ④ Review and Submit Profile

- ➔ Access the Open Payments User Guide
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- 🔒 Review the Open Payments Privacy Policy [PDF, 102 KB]

Applicable Manufacturer or Applicable GPO: Nominate Additional Roles

A field with an asterisk (*) is required.

To register an entity, you must be an authorized official within the entity and you must assume the officer role in the Open Payments system. The authorized official is a highly placed person within the entity, such as a Chief Executive Officer, Chief Financial Officer, Chief Compliance Officer, or other equivalent positions. Authorized representatives can be added now or at a later time. An entity may have a maximum of 10 active users, with 5 users in an officer role.

Officer:
Updates the applicable manufacturer or applicable GPO profile information and can approve and modify additional user roles.

Submitter:
Submits and edits payment information on behalf of the applicable manufacturer or applicable GPO. This can also be an individual from a third party entity submitting on behalf of the applicable manufacturer or applicable GPO.

Attester:
Attests to the accuracy, completeness, and timeliness of the data submitted for the applicable manufacturer or applicable GPO. During the attestation process, only the attester can submit assumptions made when reporting payments or other transfers of value, or ownership or investment interests.

Role:	First Name:	Last Name:	Business Email Address:	Business Telephone Number:	Actions:
Officer, Submitter, Attester	Susan	Jones	openpayments@yopmail.com	555-555-5555	(YOU)

[Add](#)

[Cancel](#) [Back](#) [Continue](#)

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Step 9: To add a nominee, select “Add.” The page will expand to show nominee information fields that will need to be completed. Fill in the information for the individual being nominated. Once you are done, select the “Add” button at the bottom of the page again.

Note: Selecting the “Back” button will cause you to lose all data entered.

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Manufacturer or Group Purchasing Organization Switch User Type

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Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy (PDF, 102 KB)

Applicable Manufacturer or Applicable GPO: Nominate Additional Roles

A field with an asterisk (*) is required

To register an entity, you must be an authorized official within the entity and you must assume the officer role in the Open Payments system. The authorized official is a highly placed person within the entity, such as a Chief Executive Officer, Chief Financial Officer, Chief Compliance Officer, or other equivalent positions. Authorized representatives can be added now or at a later time. An entity may have a maximum of 10 active users, with 5 users in an officer role.

Officer:
Updates the applicable manufacturer or applicable GPO profile information and can approve and modify additional user roles.

Submitter:
Submits and edits payment information on behalf of the applicable manufacturer or applicable GPO. This can also be an individual from a third party entity submitting on behalf of the applicable manufacturer or applicable GPO.

Attester:
Attests to the accuracy, completeness, and timeliness of the data submitted for the applicable manufacturer or applicable GPO. During the attestation process, only the attester can submit assumptions made when reporting payments or other transfers of value, or ownership or investment interests.

Role:	First Name:	Last Name:	Business Email Address:	Business Telephone Number:	Actions:
Officer	Susan	Jones	openpayments@yopmail.com	555-555-5555	(YOU)
Submitter:					
Attester:					

Nominee Information

Enter the user's personal information and the corresponding role for which they are being nominated. When completed select the "Add" button. Repeat this for all users you wish to nominate.

*First Name: Tom Middle Name:

*Last Name: Smith Suffix (Jr., Sr., etc.):

*Business Email Address: openpayments@yopmail.com *Business Telephone Number: 999-999-9999 555-555-5555

*Indicate the role or roles this person will have:

- Officer
- Submitter
- Attester

Business Address:

Business Address, Line 1:

Business Address, Line 2:

City Name: State: Please Select

Zip Code: 99999 9999

Cancel Add

Cancel Back Continue

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This will add the nominee information to the reporting entity's profile, as well as open another set of nominee information fields to enter an additional nominee. Repeat the process until you have entered in all individuals you wish to nominate at this time. An entity can have up to 10 unique users with a maximum of five holding the role of officer. Note that individuals can be nominated for user roles after registration is complete.

The page will display a summary of all of the individuals being nominated for user roles for this entity. Once you have entered all nominations you wish to include at this time, select "Continue."

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Applicable Manufacturer or Applicable GPO: Nominate Additional Roles

A field with an asterisk (*) is required.

Confirmation: Your nominee has been successfully added.

To register an entity, you must be an authorized official within the entity and you must assume the officer role in the Open Payments system. The authorized official is a highly placed person within the entity, such as a Chief Executive Officer, Chief Financial Officer, Chief Compliance Officer, or other equivalent positions. Authorized representatives can be added now or at a later time. An entity may have a maximum of 10 active users, with 5 users in an officer role.

Officer:
Updates the applicable manufacturer or applicable GPO profile information and can approve and modify additional user roles.

Submitter:
Submits and edits payment information on behalf of the applicable manufacturer or applicable GPO. This can also be an individual from a third party entity submitting on behalf of the applicable manufacturer or applicable GPO.

Attester:
Attests to the accuracy, completeness, and timeliness of the data submitted for the applicable manufacturer or applicable GPO. During the attestation process, only the attester can submit assumptions made when reporting payments or other transfers of value, or ownership or investment interests.

Role:	First Name:	Last Name:	Business Email Address:	Business Telephone Number:	Actions:
Officer, Submitter, Attester	Susan	Jones	openpayments@yopmail.com	555-555-5555	(YOU)
Officer, Submitter, Attester	Tom	Smith	openpayments@yopmail.com	555-555-5555	Edit Delete

[Add](#)

[Cancel](#) [Back](#) [Continue](#)

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Step 10: Review the information entered for your reporting entity and personal profile. Select the “Back” button at the bottom of the page to go back and edit any information. Once you have reviewed the information and determined it to be correct, select “Continue.”

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Review and Submit Profile

Review the information on this page to ensure it is correct. Select "Back" to navigate to the previous pages to correct any invalid information. Select "Continue" to submit your profile.

Entity's Legal Name: ABCDE Pharmaceuticals

Reporting Entity Type: Applicable Manufacturer

Business Type: Applicable manufacturer-drugs/biological

Food & Drug Administration (FDA) Establishment Identifier:

Data Universal Numbering System (D-U-N-S®) Number:

URL of Parent Company: www.cms.gov

Business Address:

Country: United States

Business Address, Line 1: 7500 Security Blvd

Business Address, Line 2:

City Name: Baltimore

State: Maryland

Zip Code: 21244

Business Telephone Number: 555-555-5555

Business Ownership Information

Type of Ownership: Corporation

Taxpayer Identifier Number (TIN)/Employer Identification Number (EIN): 23-4567890

Doing Business As (DBA) Name: ABCDE Pharmaceuticals

Is this entity part of a consolidated report (e.g., where an entity is reporting on behalf of another entity)?

No, my entity's data will not be submitted in a consolidated report

Points of Contact

The two identified points of contact will receive all important notification emails. Note: Entering an individual as a point of contact does not register that individual in the Open Payments system. Individuals must be registered in the system if they want to access the Open Payments system

Primary Point of Contact

Name: Joe Smith **Business Telephone Number:** 555-555-5555

Title at the Entity: Manager **Business Email Address:** openpayments@yopmail.com

Backup Point of Contact

Name: Mary Davis **Business Telephone Number:** 555-555-5555

Title at the Entity: Sr. Manager **Business Email Address:** openpayments@yopmail.com

Contact Information for Review and Dispute

Contact Information:
Please contact Mary Davis at 555-555-5555 or openpayments@yopmail.com for inquiries regarding disputes.

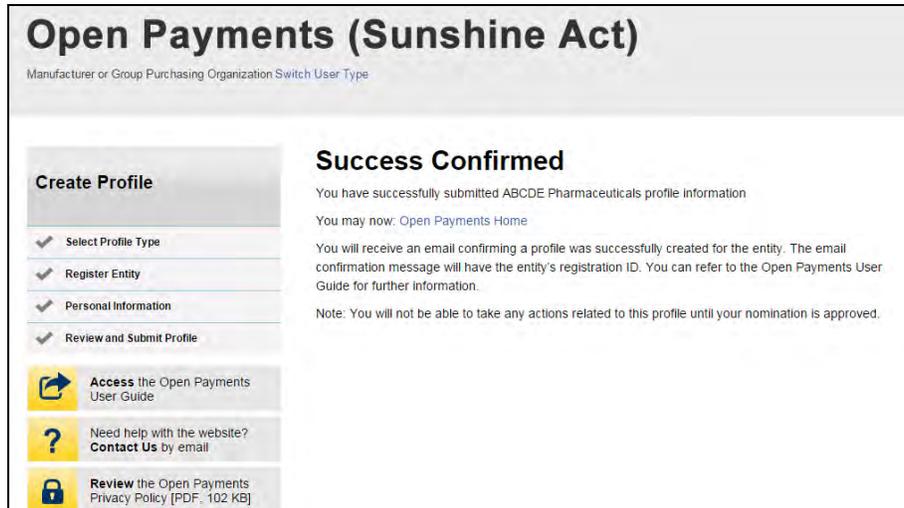
Nominations:

Role:	First Name:	Last Name:	Middle Name:	Suffix (Jr., Sr., etc.):	Business Email Address:
Officer, Submitter, Attester	Susan	Jones			openpayments@yopmail.com
Officer, Submitter, Attester	Tim	Smith			openpayments@yopmail.com

Cancel
Back
Continue

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The following message will appear to confirm your reporting entity and personal profile have been successfully created. An email notification with the entity registration ID will be sent to the identified officer(s) and points of contact.



After both the reporting entity and officer profiles are created, the Open Payments system vets the entity based on the information provided in the entity profile. An overview of the vetting process can be found in Section 3.7.

If the reporting entity's registration is successful, Open Payments will send an email notification to the officer(s) as well as the primary and backup points of contact. This email will state that the entity has been successfully registered. Users will be able to access the entity's profile in the Open Payments system and begin performing their tasks.

If the reporting entity's registration is unsuccessful, Open Payments will send an email notification to the officer(s) and points of contact stating the entity could not be successfully verified and registered. Contact the Open Payments Help Desk at openpayments@cms.hhs.gov or 1-855-326-8366 for assistance.

Section 3.4: Entity Re-Certification

Applicable manufacturers and applicable GPOs who registered for Open Payments in a previous calendar year are required to re-certify themselves each year prior to submitting data or performing review and dispute activities. You will not be able to perform any submission or review and dispute activities for a registered entity until that entity is re-certified. If you attempt to perform any such actions before re-certification an error message will notify you that your entity requires re-certification.

During re-certification, you either confirm that the details of the entity's profile in the Open Payments system are accurate or update the entity's profile information if its profile in Open Payments is inaccurate or outdated. Note that only users who hold the role of officer in the reporting entity can re-certify. If you do not have an active officer for your entity, you will need to contact the CMS Open Payments Help Desk.

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To re-certify a reporting entity, follow these steps.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page. Select the “Manage Entities” tab from the menu bar on the Open Payments landing page.

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Welcome to the Open Payments System

Announcements

2015 Program Year General Information - The program year 2015 data submission period is now open. Reporting entities may begin submitting and attesting to their data.

Reporting entities registered in a prior program year must be re-certified before any system-related actions can be performed. Review and dispute point of contact information must be provided to complete re-certification. For information on how to re-certify, refer to the quick reference guide "Applicable Manufacturer and Applicable GPO Registration and Re-Certification," located on the Resources page of the Open Payments website.

Review and dispute functionality in the Open Payments system is unavailable until April 2016.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

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

Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: From the “Manage Entities” page, select the hyperlink for the entity you wish to re-certify.

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Manage Entities

[Register New Entity](#)

The entities you are authorized to view are listed below. Select an entity from the list below to view the entity details and manage user roles affiliated with the entity.

If an entity is pending recertification, you must complete recertification before performing any system action for that entity. Entity recertification requires that an active officer within the Open Payments system reviews, updates (as necessary), and confirms all of the entity details submitted during the previous program year.

Your Entities

Name:	Registration ID:	Status:	Date Verified:
ABCDEF Medical- Pending Recertification	100000345011	Vetted	12/16/2015 16:03:50
PQRST Medical	100000350012	Vetted	12/16/2015 14:14:00

[Access](#) the Open Payments User Guide

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

[Review](#) the Open Payments Privacy Policy [PDF, 102 KB]



Open Payments User Guide

Step 3: On the entity page, select the “Update Entity” button.

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ABCDEF Medical

Entity Details Manage Roles

This page provides the information for your selected entity. Only an authorized official or authorized representative in the officer role can update any incorrect information in the entity profile by selecting the “Update Entity” button.

[Update Entity](#)

Entity Information

Entity's Registration ID: 100000345011

Entity's Legal Name: ABCDEF Medical

Reporting Entity Type: Applicable Manufacturer

Business Type: Applicable manufacturer-drugs/biological

Food & Drug Administration (FDA) Establishment Identifier:

Data Universal Numbering System (D-U-N-S® Number):

URL of Parent Company: www.CMS.govopenpayments

Business Address

Country: United States

Business Address, Line 1: 7500 Security Blvd

Business Address, Line 2:

City Name: Baltimore State: Maryland

Zip Code: 21244

Business Telephone Number: 555-555-5555

Business Ownership Information

Type of Ownership: Corporation

Taxpayer Identifier Number (TIN)/Employer Identification Number (EIN): 12-1234569

Doing Business As (DBA) Name: ABCDEF Medical

Is this entity part of a consolidated report (e.g., where an entity is reporting on behalf of another entity)?
Yes, my entity's data will be submitted in a consolidated report

Points of Contact

The two identified points of contact will receive all important notification emails. Note: Entering an individual as a point of contact does not register that individual in the Open Payments system. Individuals must be registered in the system if they want to access the Open Payments system.

Primary Point of Contact

Name: Susan Jones Business Telephone Number: 555-555-5555

Title at the Entity: CEO Business Email Address: officer@yopmail.com

Backup Point of Contact

Name: John Miller Business Telephone Number: 555-555-5555

Title at the Entity: Director Business Email Address: submitter@yopmail.com

Contact Information for Review and Dispute

Contact Information:
Susan Jones
Phone: 555-555-5555
Email: Officer@yopmail.com

Recertification Information

Recertified By: Susan Jones

Date and time recertified: January 20, 2015, 16:08PM EST



Open Payments User Guide

Changes made to the Entity Name, TIN, or DUNS Number fields will trigger your entity to be re-vetted. Updating any of the remaining fields will not trigger the vetting process. You will be able to perform the submission and review and dispute functions once your entity is successfully re-vetted.

The screenshot displays the 'Open Payments (Sunshine Act)' web application interface. At the top, there is a navigation menu with tabs for Home, Submissions, Review and Dispute, Manage Entities (which is active), My Profile, and Help. Below the navigation, the 'Manage Entities' section is highlighted. It features a confirmation message: 'Entity successfully updated' with a 'Register New Entity' button. A text block explains that entities are listed below and provides instructions on how to view details and manage user roles. It also notes that pending recertification requires completion before any system actions. Below this is a table titled 'Your Entities' with columns for Name, Registration ID, Status, and Date Verified. To the right of the main content area, there are three utility links: 'Access the Open Payments User Guide', 'Need help with the website? Contact Us by email', and 'Review the Open Payments Privacy Policy [PDF, 102 KB]'. At the bottom right, there is a small image of a man and a woman in professional attire.

Name:	Registration ID:	Status:	Date Verified:
ABCDEF Medical	100000345011	Vetted	12/21/2015 09:34:00
PQRST Medical	100000350012	Vetted	12/16/2015 14:14:00

Section 3.5: Open Payments Users and User Roles

Users in the Open Payments system affiliated with applicable manufacturers and applicable GPOs must hold at least one of three user roles: officer, submitter, or attester. Each reporting entity must have at least one officer identified. The officer should be highly placed within the entity, a Chief Executive Officer, Chief Financial Officer, Chief Compliance Officer, or other Officer of the applicable manufacturer or applicable group purchasing organization, or equivalent position (specific titles may vary depending on the management structure of the entity). These roles are discussed in detail below.

Reporting entities must have individuals assigned to specific roles within the Open Payments system to perform specific functions. Each role has a specific function in the system. There can be a total of 10 unique users per entity, with no more than five of those users holding an officer role. Each user can hold multiple user roles. It is important that prior to registration your entity determines who is the appropriate individual to fill each of these roles and perform the required tasks.

There are three user roles for applicable manufacturers and applicable GPOs:

- **Officer:** A person who will manage the applicable manufacturer or applicable GPO in the Open Payments system, and manage all user roles associated with the reporting entity.

Open Payments User Guide

- **Submitter:** A person who will submit data on payments, other transfers of value, and/or ownership and investment interests for the applicable manufacturer or applicable GPO. The submitter will also receive all notifications for disputed data.
- **Attester:** A person who will attest to the accuracy of the data that has been submitted for the applicable manufacturer or applicable GPO.

The roles, responsibilities, and access levels for the roles are shown in **Figure 3.5**, below.

Figure 3.5: Open Payments User Roles

User Roles	Functions	Requirements
Officer	<ul style="list-style-type: none"> • Manage the reporting entity’s profile in the Open Payments system • Nominate (approve) other individuals for submitter, attester, and officer roles 	<ul style="list-style-type: none"> • Must be an officer as designated by the applicable manufacturer or applicable GPO • If nominated, must either accept or reject the nomination
Submitter	<ul style="list-style-type: none"> • Submit data in the Open Payments system on behalf of the applicable manufacturer or applicable GPO • May nominate individuals for user roles • May edit payments or other transfers of value and ownership/investment interests submitted to the Open Payments system • Receives emails regarding data disputed by physicians and teaching hospitals 	<ul style="list-style-type: none"> • Not required to be an officer of the applicable manufacturer or applicable GPO • If nominated, must either accept or reject the nomination
Attester	<ul style="list-style-type: none"> • Attest to accuracy of the data in the Open Payments system on behalf of the applicable manufacturer or applicable GPO • May nominate individuals for user roles 	<ul style="list-style-type: none"> • Must be an officer of the applicable manufacturer or applicable GPO as required in the Open Payments Final Rule at 42 C.F.R. § 403.908(e) • If nominated, must either accept or reject the nomination

Section 3.6: Nominations

The nomination process allows a user to nominate an individual(s) to fill specific roles within the reporting entity. Users nominated for a particular role are able to perform certain tasks in the Open Payments system once they accept the nomination. Once a reporting entity is successfully registered in the Open Payments system, users can begin nominating additional users to fill user roles. There are two ways that individuals can be nominated for a user role:

1. Nominated by an existing Open Payments user for a role with a reporting entity; or

Open Payments User Guide

2. An individual may nominate him- or herself for a role (“self-nomination”).

Any user may nominate other individuals for specific user roles within the Open Payments system. The system will generate an email notification to the nominee once their nomination has been approved by an officer.

During initial reporting entity registration, the authorized official must nominate at least one user for each of the three roles (officer, submitter, and/or attester). This process is shown in the entity registration process shown in Section 3.3. Reporting entities can also nominate individuals after registration is complete. The process for this is shown in Section 3.6a.

One individual can hold multiple roles. Entities may nominate up to 10 unique users with a maximum of five holding the role of officer. To nominate an individual for a role, the following information must be input into the Open Payments system about that individual:

- First name
- Last name
- Job title
- Business address
- Business phone
- Email address

Once an individual receives the nomination notification, that individual must access the Open Payments system via the CMS Enterprise Portal and either accept or reject the nomination. The process for individuals accepting or rejecting nominations is shown in Sections 3.6b and 3.6c.

If the nomination is accepted, the individual will be able to complete a user profile, gain access to their entity’s profile, and perform the duties of their role. An email notification, generated by the Open Payments system, will be sent informing all users holding the role of officer with the entity that the nomination has been accepted. If the individual rejects the nomination, that individual will not be able to perform the actions on that reporting entity’s behalf and the reporting entity’s officers will receive an email notification of the rejection. Nominees will need to have EIDM credentials in order to access the Open Payments system and accept or reject their nominations.

If an individual has been nominated for multiple user roles with a reporting entity, an officer with that entity must confirm all of the individual’s user role nominations before the nominee can begin performing actions in the system.

Reporting entities may have third parties submit payments or other transfers of value on their behalf. In this case, the officer would nominate the third party to fulfill the submitter role. See Section 4.12 for more information on third-party data submission.

Open Payments User Guide

Self-nominations occur when a user nominates him- or herself for a user role within the Open Payments system. A user holding the officer role with the reporting entity must approve this nomination before the nominee can perform any functions within the system. Users choosing to self-nominate in the system must also obtain EIDM credentials in order to access Open Payments. The following figure depicts the self-nomination process.

Figure 3.6 Self-Nomination Process



To self-nominate for a role in the Open Payments system, users must access the Open Payments system via the CMS Enterprise Portal, and use the reporting entity's TIN/EIN in order to find the reporting entity in the Open Payments system.

Once the user has submitted their nomination request, the officer for that reporting entity will receive an email notification asking to approve the nomination. If the officer approves the nomination, the nominee will receive an email notification and be granted access to the system. Section 3.6d provides instructions for self-nomination and Section 3.6f provides instructions for officers with the reporting entity on how to approve or reject self-nominations.

Open Payments User Guide

3.6a: Nominating Individuals for a Role with an Existing Reporting Entity

Nominations can be done when registering a new reporting entity or after the entity has been successfully registered. To nominate individuals after an entity has been successfully registered, follow the process detailed below:

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials, navigate to the Open Payments home page, and select the “Manage Entities” tab from the menu bar on the Open Payments landing page.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home **Submissions** (Submit, Review, Attest) **Review and Dispute** (View, Respond, Resolve) **Manage Entities** (Register, Edit, Nominate Roles) **My Profile** (Account, Roles, Nominations) **Help**

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - The program year 2015 data submission period is now open. Reporting entities may begin submitting and attesting to their data.

Reporting entities registered in a prior program year must be re-certified before any system-related actions can be performed. Review and dispute point of contact information must be provided to complete re-certification. For information on how to re-certify, refer to the quick reference guide "Applicable Manufacturer and Applicable GPO Registration and Re-Certification," located on the Resources page of the Open Payments website.

Review and dispute functionality in the Open Payments system is unavailable until April 2016.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

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

Access the Open Payments User Guide

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Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: Select the hyperlink for the reporting entity for which you will nominate an individual by selecting the entity's name.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home **Submissions** (Submit, Review, Attest) **Review and Dispute** (View, Respond, Resolve) **Manage Entities** (Register, Edit, Nominate, Roles) **My Profile** (Account, Roles, Nominations) **Help**

Manage Entities

[Register New Entity](#)

The entities you are authorized to view are listed below. Select an entity from the list below to view the entity details and manage user roles affiliated with the entity.

If an entity is pending recertification, you must complete recertification before performing any system action for that entity. Entity recertification requires that an active officer within the Open Payments system reviews, updates (as necessary), and confirms all of the entity details submitted during the previous program year.

Your Entities

Name:	Registration ID:	Status:	Date Verified:
ABCDEF Medical	100000345011	Vetted	12/14/2015 11:45:08

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[Need help with the website? Contact Us by email](#)
[Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)

Open Payments User Guide

Step 3: You will be taken to the “Entity Details” tab, which displays the profile details for the entity selected. Select the “Manage Roles” tab to continue with the nomination process.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch Over Type

Home Submissions Review and Dispute Manage Entities My Profile Help
Submit, Review, Amend View, Respond, Resolve Register, Edit, Nominate, Roles Account, Roles, Notifications

ABCDEF Medical

Entity Details **Manage Roles**

This page provides the information for your selected entity. Only an authorized official or authorized representative in the officer role can update any incorrect information in the entity profile by selecting the "Update Entity" button.

[Update Entity](#)

Entity Information

Entity's Registration ID: 100000345011

Entity's Legal Name: ABCDEF Medical

Reporting Entity Type: Applicable Manufacturer

Business Type: Applicable manufacturer-drugs/biological

Food & Drug Administration (FDA) Establishment Identifier:

Data Universal Numbering System (D-U-N-S®) Number:

URL of Parent Company: www.CMS.gov/openpayments

Business Address

Country: United States

Business Address, Line 1: 7500 Security Blvd

Business Address, Line 2:

City Name: Baltimore State: Maryland

Zip Code: 21244

Business Telephone Number: 555-555-5555

Business Ownership Information

Type of Ownership: Corporation

Taxpayer Identifier Number (TIN)/Employer Identification Number (EIN): 12-1234569

Doing Business As (DBA) Name: ABCDEF Medical

Is this entity part of a consolidated report (e.g., where an entity is reporting on behalf of another entity)?
 I don't know whether my entity's data will be submitted in a consolidated report

Points of Contact

The two identified points of contact will receive all important notification emails. Note: Entering an individual as a point of contact does not register that individual in the Open Payments system. Individuals must be registered in the system if they want to access the Open Payments system.

Primary Point of Contact

Name: Susan Jones Business Telephone Number: 555-555-5555

Title at the Entity: CEO Business Email Address: officer@yopmail.com

Backup Point of Contact

Name: John Miller Business Telephone Number: 555-555-5555

Title at the Entity: Director Business Email Address: submitter@yopmail.com

Contact Information for Review and Dispute

Contact Information:
Susan Jones
Phone: 555-555-5555
Email: Officer@yopmail.com

Recertification Information

Recertified By: Susan Jones

Date and time recertified: December 11, 2015, 16:06PM EST



Open Payments User Guide

Step 4: Select "Nominate New Role."

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization [Switch User Type](#)

- Home
- Submissions
Submit, Review, Attest
- Review and Dispute
View, Respond, Resolve
- Manage Entities
[Register](#), [Edit](#), [Nominate Roles](#)
- My Profile
Account, Roles, Nominations
- Help

ABCDEF Medical

- Entity Details
- Manage Roles

This page allows you to manage user roles for the entity or nominate a new role by selecting the "Nominate New Role" button below. Note: Only an authorized official or authorized representative in the officer role is able to view/edit all authorized representatives' user roles.

Name:	Role:	Status:	Actions:
Susan Jones	Officer	Verified	Nominate New Role Modify
Susan Jones	Submitter	Approved	Modify
Susan Jones	Attester	Approved	Modify
John Miller	Officer	Nomination Approved	Modify
John Miller	Submitter	Nomination Approved	Modify
John Miller	Attester	Nomination Approved	Modify

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Open Payments User Guide

Step 5: Enter the required nominee information. Once you are done, select “Send Nomination.”

Note: Selecting the “Cancel” button will cause you to lose all data entered.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

Home	Submissions Submit, Review, Attest	Review and Dispute View, Respond, Resolve	Manage Entities Register , Edit , Nominate Roles	My Profile Account, Roles, Nominations	Help
-------------	----------------------------------------------	-----------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------	-------------

ABCDEF Medical

Entity Details | **Manage Roles**

Nominate New Role

A field with an asterisk (*) is required.

Nominate someone who will have a role on Open Payments for your entity.

*First Name: Mary	Middle Name:
*Last Name: Davis	Suffix (Jr., Sr., etc.):
*Business Email Address: opepayments@yopmail.com	*Business Telephone Number: 999-999-9999 555-555-5555

*Indicate the role or roles this person will have:

- Officer
- Submitter
- Attester

Business Address, Line 1:

Business Address, Line 2:

City Name: State: Please Select

Zip Code:
99999 9999

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Open Payments User Guide

The on-screen message below will appear once you have completed the nomination.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home Submissions (Submit, Review, Attest) Review and Dispute (View, Respond, Resolve) **Manage Entities** (Register, Edit, Nominate Roles) My Profile (Account, Roles, Nominations) Help

ABCDEF Medical

Entity Details Manage Roles

This page allows you to manage user roles for the entity or nominate a new role by selecting the "Nominate New Role" button below. Note: Only an authorized official or authorized representative in the officer role is able to view/edit all authorized representatives' user roles.

You have successfully submitted Role Information

Nominate New Role

Name:	Role:	Status:	Actions:
Susan Jones	Officer	Verified	Modify
Susan Jones	Submitter	Approved	Modify
Susan Jones	Attester	Approved	Modify
Mary Davis	Officer	Nomination Approved	Modify
Mary Davis	Submitter	Nomination Approved	Modify
Mary Davis	Attester	Nomination Approved	Modify
John Miller	Officer	Nomination Approved	Modify
John Miller	Submitter	Nomination Approved	Modify
John Miller	Attester	Nomination Approved	Modify

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Review the Open Payments Privacy Policy [PDF, 102 KB]

If the nomination was made by a user with an officer role, the nominee will automatically receive an email notification that he or she has been nominated for a role in the Open Payments system. The email notifying the nominee of the user role nomination will contain a registration ID and a nomination ID. The individual will then access the system using those IDs and either accept or reject the nomination.

If the nomination was made by a user who does not hold an officer role, an email notification will be sent to the officers of the reporting entity regarding the nomination. One officer must approve or reject the nomination. Once the officer approves the nomination, the nominee will receive the nomination notification email.

3.6b: Accepting a Nomination (First Time System Users)

Users notified of their nomination for a role must access the Open Payments system via the CMS Enterprise Portal and either accept or reject their nomination. The user will use the registration ID and nomination ID received in the nomination email to complete their profile in the Open Payments system and receive access to the functions for that specific role. The process for accepting nominations is outlined in **Figure 3.7**, below.

Figure 3.7: Accepting Nominations

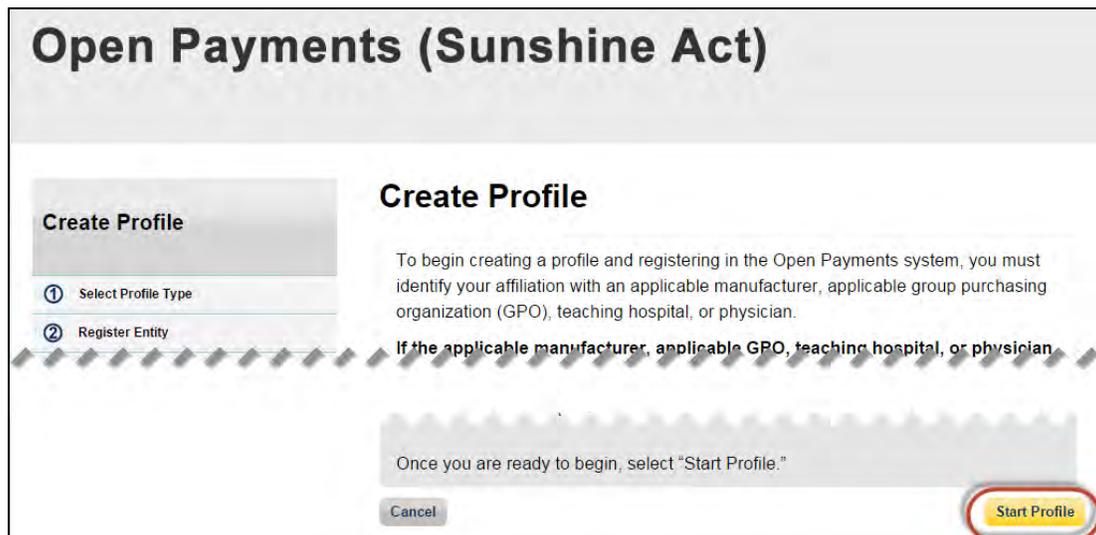


To accept a nomination in the Open Payments system, follow the steps below:

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials, navigate to the Open Payments home page, and select “Create My Profile.”



Step 2: Select “Start Profile” at the bottom of the page after reading the instructions on the “Create Profile” page.



Open Payments User Guide

Step 3: Select the “I have a Registration ID and Nomination ID” link on the “Select Profile Type” page.

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Register Entity
- Personal Information
- Review and Submit Profile

Select Profile Type

A field with an asterisk (*) is required.

If you do not have a registration ID and/or nomination ID, begin creating your profile by indicating below whether you are affiliated with an applicable manufacturer or applicable GPO, teaching hospital, or physician.

If you received a registration ID and/or nomination ID in an email notifying you of your nomination role, you may begin creating your profile by selecting the “I have a Registration ID and Nomination ID” link.

Note that if you wish to register as a physician authorized representative, you must have a nomination ID. You cannot nominate yourself for a physician authorized representative role.

If you are a physician that is affiliated with a teaching hospital, you should register yourself as a physician and not as a teaching hospital. Physicians can view records submitted about them only if they register themselves as physicians. Registering as a teaching hospital will allow you to view only records submitted about the teaching hospital. If you have any questions regarding the user type you should register as, please contact the Open Payments Help Desk (openpayments@cms.hhs.gov) for guidance.

***Required: Select the type of entity or covered recipient you are affiliated with OR the “I have a Registration and Nomination ID” link.**

- Applicable manufacturer or applicable group purchasing organization (GPO)
- Physician
- Teaching hospital

----- OR -----

[I have a Registration ID and Nomination ID](#)

Cancel Continue

Step 4: Select the User Type “Applicable Manufacturer or Applicable GPO.” Enter the registration ID and nomination ID that you received in the nomination notification email and then select “Show Nomination.”

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Register Entity
 - Search Nomination
 - Entity Information
 - Confirm Nomination
- Personal Information
- Review and Submit Profile

Enter Registration & Nomination ID

A field with an asterisk (*) is required.

From the dropdown list below, select your User Type.

Enter the Registration ID and Nomination ID provided in the nomination email notification you should have received.

Select “Show Nomination” to see the information associated with your nomination.

***User Type**

Applicable Manufacturer or Applicable GPO

***Registration ID:**
The ID is a 12-digit number
100000345011

***Nomination ID:**
The ID is a 12-digit number
748639857405

Show Nomination

Cancel

Open Payments User Guide

Step 5: Review the nomination information displayed. If the information is correct, select “Continue.” If the information is incorrect, select “Cancel” and contact the reporting entity’s authorized official.

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Register Entity
- Search Nomination**
- Entity Information
- Confirm Nomination
- Personal Information
- Review and Submit Profile

Access the Open Payments User Guide

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Review the Open Payments Privacy Policy [PDF, 102 KB]

Enter Registration & Nomination ID

A field with an asterisk (*) is required.

From the dropdown list below, select your User Type.

Enter the Registration ID and Nomination ID provided in the nomination email notification you should have received.

Select "Show Nomination" to see the information associated with your nomination.

***User Type**
Applicable Manufacturer or Applicable GPO

***Registration ID:**
The ID is a 12-digit number
100000345011

***Nomination ID:**
The ID is a 12-digit number
748639857405

Show Nomination

Review and confirm the entity identified below is correct. Select the "Continue" button if this is the correct entity.

John Miller was nominated as Officer, Submitter, Attester

Entity Information: **Applicable manufacturer-
drugs/biological**

Entity's Legal Name: **ABCDEF Medical**

Cancel **Continue**

Open Payments User Guide

Step 6: Review and confirm the reporting entity information displayed on the page. If any of the entity information is incorrect, stop this process and inform an officer for that entity of the incorrect information. If the information is correct, select “Continue” to proceed.

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Register Entity
- Search Nomination
- Entity Information
- Confirm Nomination
- Personal Information
- Review and Submit Profile

- Access the Open Payments User Guide
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Confirm Entity

Below is the information for your selected entity. Review and confirm the entity identified below is correct. Select "Continue" button to begin creating your user profile.

Entity's Registration ID: 100000345011

Entity's Legal Name: ABCDEF Medical

Reporting Entity Type: Applicable Manufacturer

Business Type: Applicable manufacturer-drugs/biological

Food & Drug Administration (FDA) Establishment Identifier:

Data Universal Numbering System (D-U-N-S® Number):

URL of Parent Company: www.CMS.gov/openpayments

Business Address

Country: United States

Business Address, Line 1: 7500 Security Blvd.

Business Address, Line 2:

City Name: Baltimore **State:** Maryland

Zip Code: 21244 **Business Telephone Number:** 555-555-5555

Business Ownership Information

Type of Ownership: Corporation

Taxpayer Identifier Number (TIN)/Employer Identification Number (EIN): 12-1234569

Doing Business As (DBA) Name: ABCDEF Medical

Consolidated Report Type: Yes, my entity's data will be submitted in a consolidated report

Open Payments User Guide

Step 7: Select “Yes, I accept” for roles you accept and “No, I do not accept” for roles you do not accept.

If you reject all roles for which you have been nominated, select “Continue” after selecting “No, I do not accept” for all roles. The system will ask you if you’re sure you want to reject these roles. If you confirm your choice to reject the roles, you will not be able to perform any actions on behalf of the reporting entity and the nominator will receive an email notifying him or her that you rejected the nominations. The nominator will then be allowed to nominate other people for the roles.

If you accept one or all roles and select “Continue,” you will continue the nomination confirmation process.

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ② Register Entity
- ✓ Search Nomination
- ✓ Entity Information
- Confirm Nomination**
- ③ Personal Information
- ④ Review and Submit Profile

[Access the Open Payments User Guide](#)

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

[Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)

Confirm Nomination

A field with an asterisk (*) is required.

Confirm the user role by either accepting or rejecting the nomination. Select the appropriate option below. Then, select "Continue" to work on your personal profile.

Officer:
Updates the applicable manufacturer or applicable GPO profile information and can approve and modify additional user roles.

Submitter:
Submits and edits payment information on behalf of the applicable manufacturer or applicable GPO. This can also be an individual from a third party entity submitting on behalf of the applicable manufacturer or applicable GPO.

Attester:
Attests to the accuracy, completeness, and timeliness of the data submitted for the applicable manufacturer or applicable GPO. During the attestation process, only the attester can submit assumptions made when reporting payments or other transfers of value, or ownership or investment interests.

ABCDEF Medical

*Confirm Nominations:

Officer Yes, I accept No, I do not accept

Submitter Yes, I accept No, I do not accept

Attester Yes, I accept No, I do not accept

Open Payments User Guide

Step 8: Enter your personal information and select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Register Entity
- Personal Information**
- Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Enter Personal Information

A field with an asterisk (*) is required.

Add the following personal and business information to your user profile. Your first name and last name have been prepopulated from your CMS Enterprise Identity Management system (EIDM) profile. You may edit the prepopulated fields as needed. However, changing this information in Open Payments will not change the corresponding information in your EIDM profile. Once completed, select “Continue.”

Your Name

*First Name: *Last Name:
Middle Name: Suffix (Jr., Sr., etc.):

Your Business Contact Information

Enter your business or entity information.

*Business Email Address: *Business Telephone Number:
999-999-9999
*Job Title:
*Business Address, Line 1:
Business Address, Line 2:
*City Name: *State:
*Zip Code:
99999 9999

Open Payments User Guide

Step 9: You will be asked to review the information you have entered. To correct any errors, select the “Back” button at the bottom of the page to return to previous pages and make your corrections. If the information is correct, select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ✓ Register Entity
- ✓ Personal Information
- ④ Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? [Contact Us](#) by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Review and Submit Profile

Review the information on this page to ensure it is correct. Select “Back” to navigate to the previous pages to correct any invalid information. Select “Continue” to submit your profile.

Entity's Registration ID: 100000345011

Entity's Legal Name: ABCDEF Medical

Reporting Entity Type: Applicable Manufacturer

Business Type: Applicable manufacturer-drugs/biological

Food & Drug Administration (FDA) Establishment Identifier:

Data Universal Numbering System (D-U-N-S® Number):

URL of Parent Company: www.CMS.gov/openpayments

Business Address:

Country: United States

Business Address, Line 1: 7500 Security Blvd.

Business Address, Line 2:

City Name: Baltimore

State: Maryland

Zip Code: 21244

Business Telephone Number: 555-555-5555

Business Ownership Information

Type of Ownership: Corporation

Taxpayer Identifier Number (TIN)/Employer Identification Number (EIN): 12-1234569

Doing Business As (DBA) Name: ABCDEF Medical

Is this entity part of a consolidated report (e.g., where an entity is reporting on behalf of another entity)?

Yes, my entity's data will be submitted in a consolidated report

Nominations:

Role:	First Name:	Last Name:	Middle Name:	Suffix (Jr., Sr., etc.):	Business Email Address:
Officer	John	Miller			submitter@yopmail.com
Submitter	John	Miller			submitter@yopmail.com

[Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

The following message will appear on-screen to confirm your nomination has been successfully accepted. Notification emails will be sent to all of the users who hold the role of officer with that entity that you have accepted your nomination.

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ✓ Register Entity
- ✓ Personal Information
- ✓ Review and Submit Profile

Success Confirmed

You have successfully accepted your affiliation with ABCDEF Medical and created your own profile, John Miller.

You may now. [Open Payments Home](#)

Access the Open Payments User Guide

? Need help with the website? **Contact Us** by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

3.6c: Accepting a Nomination (Returning System Users)

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials, navigate to the Open Payments home page, and select the “My Profile” tab from the menu bar on the Open Payments landing page.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home **Submissions** **Review and Dispute** **Manage Entities** **My Profile** **Help**

Submit, Review, Attest View, Respond, Resolve Register, Edit, Nominate Roles Account, Roles, Nominations

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - The program year 2015 data submission period is now open. Reporting entities may begin submitting and attesting to their data.

Reporting entities registered in a prior program year must be re-certified before any system-related actions can be performed. Review and dispute point of contact information must be provided to complete re-certification. For information on how to re-certify, refer to the quick reference guide "Applicable Manufacturer and Applicable GPO Registration and Re-Certification," located on the Resources page of the Open Payments website.

Review and dispute functionality in the Open Payments system is unavailable until April 2016.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

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

Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: Select the “My Roles and Nominations” tab.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home | Submissions (Submit, Review, Attest) | Review and Dispute (View, Respond, Resolve) | Manage Entities (Register, Edit, Nominate Roles) | **My Profile (Account, Roles, Nominations)** | Help

My Profile

Overview | Profile Details | **My Roles & Nominations**

This page contains information about your authorized role(s)

Profile Name

Profile Name
Susan Jones

Your Authorized Roles

Role:	Entity:	Status:
Attester	ABCDE Medical	Requested
Submitter	ABCDE Medical	Requested
Officer	ABCDE Medical	Requested

Recent Notifications

There are no recent notifications for this profile.

Access the Open Payments User Guide
Need help with the website? **Contact Us** by email
Review the Open Payments Privacy Policy [PDF, 102 KB]

Step 3: On the “My Roles and Nominations” tab, select “Accept a Role.”

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home | Submissions (Submit, Review, Attest) | Review and Dispute (View, Respond, Resolve) | Manage Entities (Register, Edit, Nominate Roles) | **My Profile (Account, Roles, Nominations)** | Help

My Profile

Overview | Profile Details | **My Roles & Nominations**

Below are your user roles for each entity with which you are affiliated. You have the option to accept additional roles or request additional roles for your affiliated entities.

Accept a Role | Request a Role

My Roles

Role:	Name:	Status:
Attester	ABCDE Medical	Requested
Submitter	ABCDE Medical	Requested
Officer	ABCDE Medical	Requested

Access the Open Payments User Guide
Need help with the website? **Contact Us** by email
Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 4: Enter the registration ID and nomination ID provided in the email notification and select “Show Nomination.”

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home | Submissions (Submit, Review, Attest) | Review and Dispute (View, Respond, Resolve) | Manage Entities (Register, Edit, Nominate, Roles) | My Profile (Account, Roles, Nominations) | Help

Create Profile

- Select Profile Type
- Register Entity
- Search Nomination**
- Entity Information
- Confirm Nomination
- Personal Information
- Review and Submit Profile

Access the Open Payments User Guide | Need help with the website? Contact Us by email | Review the Open Payments Privacy Policy [PDF, 102 KB]

Enter Registration & Nomination ID

A field with an asterisk (*) is required.
From the dropdown list below, select your User Type.

Enter the Registration ID and Nomination ID provided in the nomination email notification you should have received.
Select "Show Nomination" to see the information associated with your nomination.

*User Type
Applicable Manufacturer or Applicable GPO

*Registration ID:
The ID is a 12-digit number
100000345011

*Nomination ID:
The ID is a 12-digit number
616257741858

Show Nomination

Cancel

Step 5: Review the nomination information displayed. If the information is correct, select “Continue.” If the information is incorrect, select “Cancel” and contact the reporting entity’s authorized official.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home | Submissions (Submit, Review, Attest) | Review and Dispute (View, Respond, Resolve) | Manage Entities (Register, Edit, Nominate, Roles) | My Profile (Account, Roles, Nominations) | Help

Create Profile

- Select Profile Type
- Register Entity
- Search Nomination**
- Entity Information
- Confirm Nomination
- Personal Information
- Review and Submit Profile

Access the Open Payments User Guide | Need help with the website? Contact Us by email | Review the Open Payments Privacy Policy [PDF, 102 KB]

Enter Registration & Nomination ID

A field with an asterisk (*) is required.
From the dropdown list below, select your User Type.

Enter the Registration ID and Nomination ID provided in the nomination email notification you should have received.
Select "Show Nomination" to see the information associated with your nomination.

*User Type
Applicable Manufacturer or Applicable GPO

*Registration ID:
The ID is a 12-digit number
100000345011

*Nomination ID:
The ID is a 12-digit number
616257741858

Show Nomination

Cancel

Open Payments User Guide

Step 6: Review the reporting entity information on the page and select “Continue” to proceed with the nomination confirmation process. If any of the entity details are incorrect, contact the reporting entity’s authorized official.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

Create Profile

- Select Profile Type
- Register Entity
- Search Nomination
- Entity Information**
 - Confirm Nomination
- Personal Information
- Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Confirm Entity

Below is the information for your selected entity. Review and confirm the entity identified below is correct. Select "Continue" button to begin creating your user profile.

Entity's Registration ID: 100000345011

Entity's Legal Name: ABCDEF Medical

Reporting Entity Type: Applicable Manufacturer

Business Type: Applicable manufacturer-drugs/biological

Food & Drug Administration (FDA) Establishment Identifier:

Data Universal Numbering System (D-U-N-S® Number):

URL of Parent Company: www.CMS.gov/openpayments

Business Address

Country: United States

Business Address, Line 1: 7500 Security Blvd.

Business Address, Line 2:

City Name: Baltimore **State:** Maryland

Zip Code: 21244 **Business Telephone Number:** 555-555-5555

Business Ownership Information

Type of Ownership: Corporation

Taxpayer Identifier Number (TIN)/Employer Identification Number (EIN): 12-1234569

Doing Business As (DBA) Name: ABCDEF Medical

Consolidated Report Type: Yes, my entity's data will be submitted in a consolidated report

[Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

Step 7: Select “Yes, I accept” for roles you accept and “No, I do not accept” for roles you do not accept.

If you reject all roles for which you have been nominated, Select “Continue” after selecting “No, I do not accept” for all roles. The system will ask you if you’re sure you want to reject these roles. If you confirm your choice to reject all roles, you will not be able to perform any actions on behalf of the entity and the nominator will receive an email notifying him or her that you rejected the nominations. The nominator will then be allowed to nominate other people for the roles.

If you accept one or all roles and select “Continue,” you will continue the nomination confirmation process.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization [Switch User Type](#)

Create Profile

- ✓ Select Profile Type
- ② Register Entity
- ✓ Search Nomination
- ✓ Entity Information
- Confirm Nomination**
- ③ Personal Information
- ④ Review and Submit Profile

Confirm Nomination

A field with an asterisk (*) is required.

Confirm the user role by either accepting or rejecting the nomination. Select the appropriate option below. Then, select “Continue” to work on your personal profile.

Officer:
Updates the applicable manufacturer or applicable GPO profile information and can approve and modify additional user roles.

Submitter:
Submits and edits payment information on behalf of the applicable manufacturer or applicable GPO. This can also be an individual from a third party entity submitting on behalf of the applicable manufacturer or applicable GPO.

Attester:
Attests to the accuracy, completeness, and timeliness of the data submitted for the applicable manufacturer or applicable GPO. During the attestation process, only the attester can submit assumptions made when reporting payments or other transfers of value, or ownership or investment interests.

ABCDEF Medical

***Confirm Nominations:**

Officer Yes, I accept No, I do not accept

Submitter Yes, I accept No, I do not accept

Attester Yes, I accept No, I do not accept

[Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

Step 8: Review the reporting entity information and personal profile. Select the “Back” button at the bottom of the page to go back and edit any personal information. If the entity information is not correct, select “Cancel” and contact your reporting entity’s authorized official. If the information is correct, select “Continue.”

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization [Switch User Type](#)

Create Profile

- Select Profile Type
- Register Entity
- Personal Information
- Review and Submit Profile**
- Access the Open Payments User Guide
- Need help with the website? [Contact Us](#) by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Review and Submit Profile

Review the information on this page to ensure it is correct. Select “Back” to navigate to the previous pages to correct any invalid information. Select “Continue” to submit your profile.

Entity's Registration ID: 100000345011

Entity's Legal Name: ABCDEF Medical

Reporting Entity Type: Applicable Manufacturer

Business Type: Applicable manufacturer-drugs/biological

Food & Drug Administration (FDA) Establishment Identifier:

Data Universal Numbering System (D-U-N-S® Number):

URL of Parent Company: www.CMS.gov/openpayments

Business Address:

Country: United States

Business Address, Line 1: 7500 Security Blvd.

Business Address, Line 2:

City Name: Baltimore

State: Maryland

Zip Code: 21244

Business Telephone Number: 555-555-5555

Business Ownership Information

Type of Ownership: Corporation

Taxpayer Identifier Number (TIN)/Employer Identification Number (EIN): 12-1234569

Doing Business As (DBA) Name: ABCDEF Medical

Is this entity part of a consolidated report (e.g., where an entity is reporting on behalf of another entity)?

Yes, my entity's data will be submitted in a consolidated report

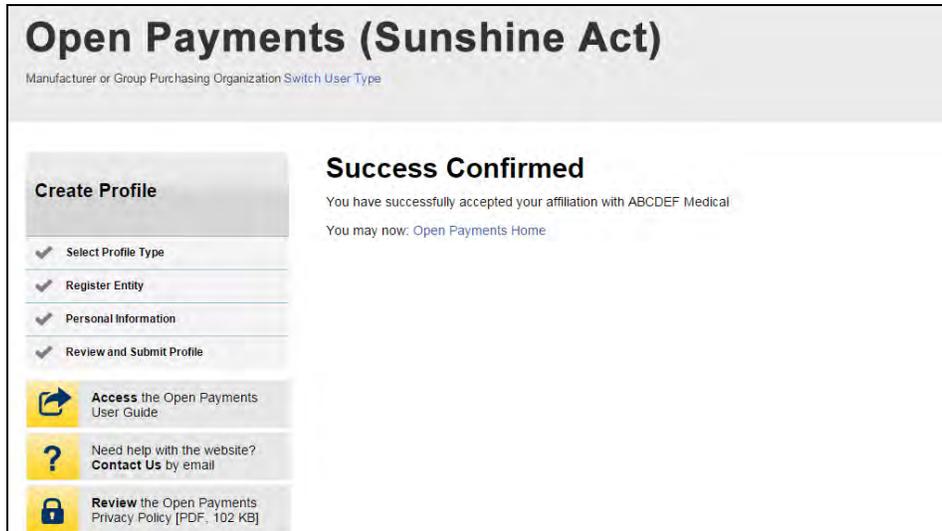
Nominations:

Role:	First Name:	Last Name:	Middle Name:	Suffix (Jr., Sr., etc.):	Business Email Address:
Officer	Mary	Davis			opepayments@yopmail.com
Attester	Mary	Davis			opepayments@yopmail.com

[Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

The following message will appear on-screen to confirm your acceptance of one or more user roles. Notification emails will be sent to all of the users who hold the role of officer with that entity that you have accepted your nomination.



3.6d: Self-Nomination with a Registered Entity (First Time System Users)

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page. The on-screen text contains important information regarding the registration process. Read the on-screen text and select “Create My Profile” to begin the registration process.



Open Payments User Guide

Step 2: The on-screen text contains important information regarding creating the reporting entity and individual profile. Read the on-screen text and select “Start Profile” at the bottom of the page when you are ready to continue.

Open Payments (Sunshine Act)

Create Profile

To begin creating a profile and registering in the Open Payments system, you must identify your affiliation with an applicable manufacturer, applicable group purchasing organization (GPO), teaching hospital, or physician.

If the applicable manufacturer, applicable GPO, teaching hospital, or physician

Once you are ready to begin, select "Start Profile."

Cancel Start Profile

Step 3: Select the profile type “Applicable Manufacturer or Applicable GPO” and select “Continue.”

Open Payments (Sunshine Act)

Select Profile Type

A field with an asterisk (*) is required.

If you do not have a registration ID and/or nomination ID, begin creating your profile by indicating below whether you are affiliated with an applicable manufacturer or applicable GPO, teaching hospital, or physician.

If you received a registration ID and/or nomination ID in an email notifying you of your nomination role, you may begin creating your profile by selecting the "I have a Registration ID and Nomination ID" link.

Note that if you wish to register as a physician authorized representative, you must have a nomination ID. You cannot nominate yourself for a physician authorized representative role.

If you are a physician that is affiliated with a teaching hospital, you should register yourself as a physician and not as a teaching hospital. Physicians can view records submitted about them only if they register themselves as physicians. Registering as a teaching hospital will allow you to view only records submitted about the teaching hospital. If you have any questions regarding the user type you should register as, please contact the Open Payments Help Desk (openpayments@cms.hhs.gov) for guidance.

*Required: Select the type of entity or covered recipient you are affiliated with OR the "I have a Registration and Nomination ID" link.

Applicable manufacturer or applicable group purchasing organization (GPO)

Physician

Teaching hospital

----- OR -----

[I have a Registration ID and Nomination ID](#)

Cancel Continue

Open Payments User Guide

Step 4: Enter the Taxpayer Identification Number/Employer Identification Number (TIN/EIN) of the reporting entity that you want to associate yourself with. The TIN must be nine digits, with a dash after the second digit. Select “Find.”

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Register Entity**
- Personal Information
- Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy (PDF, 102 KB)

Entity Lookup

A field with an asterisk (*) is required.

Enter the entity's Taxpayer Identification Number (TIN)/Employer Identification Number (EIN) below to perform a search for any entities registered with the selected TIN/EIN.

If the TIN/EIN entered does not return any results, the entity has not yet been registered within the Open Payments system and you may proceed with registering the entity by selecting the "Register Your Entity on Open Payments" link.

The TIN/EIN search will return results if entities associated with TIN/EIN have been registered in the Open Payments system. If the list of entities returned does not contain the entity you wish to register with, you may proceed with registering the entity yourself by selecting "Other." If the list of entities returned contains the entity you wish to affiliate yourself with, you may select that entity and proceed with creating your profile and associating yourself with that entity.

Required: Enter the TIN/EIN you wish to be associated with.

*Enter TIN/EIN:
99-9999999
12.1234567 **Find**

Cancel **Back**

Step 5: Select the correct entity from the list displayed and select “Continue.”

Note that if no reporting entity is found for the TIN/EIN you supplied, the entity has not yet been registered in the Open Payments system. You may register the entity in Open Payments yourself if you are a designated officer for the reporting entity. If you are not, or do not wish to register the entity yourself, you may contact an officer within the entity to request that he or she register the entity in the Open Payments system.

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Register Entity**
- Personal Information
- Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy (PDF, 102 KB)

Entity Lookup

A field with an asterisk (*) is required.

Enter the entity's Taxpayer Identification Number (TIN)/Employer Identification Number (EIN) below to perform a search for any entities registered with the selected TIN/EIN.

If the TIN/EIN entered does not return any results, the entity has not yet been registered within the Open Payments system and you may proceed with registering the entity by selecting the "Register Your Entity on Open Payments" link.

The TIN/EIN search will return results if entities associated with TIN/EIN have been registered in the Open Payments system. If the list of entities returned does not contain the entity you wish to register with, you may proceed with registering the entity yourself by selecting "Other." If the list of entities returned contains the entity you wish to affiliate yourself with, you may select that entity and proceed with creating your profile and associating yourself with that entity.

Required: Enter the TIN/EIN you wish to be associated with.

*Enter TIN/EIN:
99-9999999
12.1234567 **Find**

For the TIN/EIN entered above, the following entities were identified:

- ABCDE Medical (Entity's Registration ID: 10000010024)
- Other: I want to register a subsidiary or other affiliate with the same TIN/EIN

Cancel **Back** **Continue**

Open Payments User Guide

Step 6: Review and confirm the reporting entity information displayed on the page. If any of the entity information is incorrect, stop this process and inform a user holding the role of officer for that entity of the incorrect information. If the information is correct, select “Continue” to proceed.

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Register Entity
- Entity Information**
- Your Roles
- Personal Information
- Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Confirm Entity

Below is the information for your selected entity. Review and confirm the entity identified below is correct. Select "Continue" button to begin creating your user profile.

Entity's Registration ID: 100000010024

Entity's Legal Name: ABCDE Medical

Reporting Entity Type: Applicable Manufacturer

Business Type: Applicable manufacturer-drugs/biological

Food & Drug Administration (FDA) Establishment Identifier:

Data Universal Numbering System (D-U-N-S® Number):

URL of Parent Company: www.cms.gov/openpayments/index.html

Business Address

Country: United States

Business Address, Line 1: 7500 Security Blvd.

Business Address, Line 2:

City Name: Baltimore **State:** Maryland

Zip Code: 21244 **Business Telephone Number:** 555-555-5555

Business Ownership Information

Type of Ownership: Corporation

Taxpayer Identifier Number (TIN)/Employer Identification Number (EIN): 12-1234567

Doing Business As (DBA) Name: ABCDE Medical

Consolidated Report Type: I don't know whether my entity's data will be submitted in a consolidated report

[Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

Step 7: Enter your personal information and select the roles for which you want to nominate yourself. Select "Continue" to proceed.

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Register Entity
- Entity Information
- Your Roles**
- Personal Information
- Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Your Role

A field with an asterisk (*) is required.

You must nominate yourself for one or more roles in the Open Payments system. There are three user roles:

Officer:
Updates the applicable manufacturer or applicable GPO profile information and can approve and modify additional user roles.

Submitter:
Submits and edits payment information on behalf of the applicable manufacturer or applicable GPO. This can also be an individual from a third party entity submitting on behalf of the applicable manufacturer or applicable GPO.

Attester:
Attests to the accuracy, completeness, and timeliness of the data submitted for the applicable manufacturer or applicable GPO. During the attestation process, only the attester can submit assumptions made when reporting payments or other transfers of value, or ownership or investment interests.

*First Name: Susan Middle Name:

*Last Name: Jones Suffix (Jr., Sr., etc.):

*Business Email Address: openpayments@yopmail.com *Business Telephone Number: 555-555-5555

Indicate your role(s) in the Open Payments system. Only an authorized official or authorized representative in the officer role may manage the access level of attesters, submitters, and other officers in the system. Your role is not confirmed until the authorized official or authorized representative in the officer role has approved your nomination. You will be notified via email once your nomination has been approved.

Highest Level of Role

- Officer

Reporting-related Roles

- Submitter
- Attester

Select "Continue" to begin creating your user profile.

Cancel Back Continue

Open Payments User Guide

Step 8: On the “Enter Personal Information” page, enter your personal information and business contact information. Required fields are marked with an asterisk(*). When entering a telephone number, be sure to place hyphens(-) between the area code and prefix, and the prefix and the last four digits. Once you have entered in all of the information, select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ✓ Register Entity
- ③ Personal Information**
- ④ Review and Submit Profile
- ➡ Access the Open Payments User Guide
- 🔗 Need help with the website? Contact Us by email
- 🔒 Review the Open Payments Privacy Policy [PDF, 102 KB]

Enter Personal Information

A field with an asterisk (*) is required.

Add the following personal and business information to your user profile. Your first name and last name have been prepopulated from your CMS Enterprise Identity Management system (EIDM) profile. You may edit the prepopulated fields as needed. However, changing this information in Open Payments will not change the corresponding information in your EIDM profile. Once completed, select “Continue.”

Your Name

*First Name: Susan

*Last Name: Jones

Middle Name:

Suffix (Jr., Sr., etc.):

Your Business Contact Information

Enter your business or entity information.

*Business Email Address: openpayments@yopmail.com

*Business Telephone Number: 999-999-9999
555-555-5555

*Job Title: Director

*Business Address, Line 1: 7500 Security Blvd

Business Address, Line 2:

*City Name: Baltimore

*State: Maryland

*Zip Code: 99999 9999
21244

Cancel Back **Continue**

Open Payments User Guide

Step 9: Review the information entered in your profile. Select the “Back” button at the bottom of the page to go back and edit any incorrect information. When the information is correct, select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ✓ Register Entity
- ✓ Personal Information
- 4 Review and Submit Profile**

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Review and Submit Profile

Review the information on this page to ensure it is correct. Select “Back” to navigate to the previous pages to correct any invalid information. Select “Continue” to submit your profile.

Entity's Registration ID: 100000010024

Entity's Legal Name: ABCDE Medical

Reporting Entity Type: Applicable Manufacturer

Business Type: Applicable manufacturer-drugs/biological

Food & Drug Administration (FDA) Establishment Identifier:

Data Universal Numbering System (D-U-N-S®) Number:

URL of Parent Company: www.cms.gov/openpayments/index.html

Business Address:

Country: United States

Business Address, Line 1: 7500 Security Blvd.

Business Address, Line 2:

City Name: Baltimore

State: Maryland

Zip Code: 21244

Business Telephone Number: 555-555-5555

Business Ownership Information

Type of Ownership: Corporation

Taxpayer Identifier Number (TIN)/Employer Identification Number (EIN): 12-1234567

Doing Business As (DBA) Name: ABCDE Medical

Is this entity part of a consolidated report (e.g., where an entity is reporting on behalf of another entity)?

I don't know whether my entity's data will be submitted in a consolidated report

Nominations:

Role:	First Name:	Last Name:	Middle Name:	Suffix (Jr., Sr., etc.):	Business Email Address:
Officer/Submitter/Attester	Susan	Jones			openpayments@yopmail.com

Open Payments User Guide

The following on-screen message will appear to confirm your profile creation was successful. A notification email will be sent to officers of the entity, informing them of your self-nomination request.

The screenshot shows a confirmation page titled "Open Payments (Sunshine Act)". On the left, under "Create Profile", there is a checklist of completed steps: "Select Profile Type", "Register Entity", "Personal Information", and "Review and Submit Profile". Below this are three utility links: "Access the Open Payments User Guide", "Need help with the website? Contact Us by email", and "Review the Open Payments Privacy Policy [PDF, 102 KB]". The main content area is titled "Success Confirmed" and contains the following text: "You have successfully requested to be affiliated with ABCDE Medical", "You may now: Open Payments Home", "You will receive an email when your nomination is approved. You can refer to the Open Payments User Guide for further information.", and "Note: You will not be able to take any actions related to this profile until your nomination is approved."

3.6e: Additional Self-Nomination with a Registered Entity (Returning System Users)

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials, navigate to the Open Payments home page, and select the "My Profile" tab from the menu bar on the Open Payments landing page.

The screenshot shows the "Open Payments (Sunshine Act)" home page. At the top, it says "Manufacturer or Group Purchasing Organization Switch User Type". Below this is a navigation menu with tabs: "Home", "Submissions (Submit, Review, Attest)", "Review and Dispute (View, Respond, Resolve)", "Manage Entities (Register, Edit, Nominate Roles)", "My Profile (Account, Roles, Nominations)", and "Help". The "My Profile" tab is highlighted with a red circle. The main content area is titled "Welcome to the Open Payments System" and includes an "Announcements" section with text about the 2015 program year general information, re-certification requirements, and review and dispute functionality. On the right side, there are three utility links: "Access the Open Payments User Guide", "Need help with the website? Contact Us by email", and "Review the Open Payments Privacy Policy [PDF, 102 KB]". Below these links is a photograph of a man and a woman in professional attire.

Open Payments User Guide

Step 2: From the “My Profile Overview” page, select the “My Roles and Nominations” tab.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home | Submissions (Submit, Review, Attest) | Review and Dispute (View, Respond, Resolve) | Manage Entities (Register, Edit, Nominate Roles) | **My Profile (Account, Roles, Nominations)** | Help

My Profile

Overview | Profile Details | **My Roles & Nominations**

This page contains information about your authorized role(s)

Profile Name
Mary Smith

Your Authorized Roles

Role:	Entity:	Status:
Officer	ABCDE Pharmaceuticals	Requested
Submitter	ABCDE Pharmaceuticals	Requested
Attester	ABCDE Pharmaceuticals	Requested

Recent Notifications
There are no recent notifications for this profile.

Access the Open Payments User Guide
Need help with the website? **Contact Us** by email
Review the Open Payments Privacy Policy [PDF, 102 KB]

Step 3: From the “My Roles and Nominations” tab, select “Request a Role.”

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home | Submissions (Submit, Review, Attest) | Review and Dispute (View, Respond, Resolve) | Manage Entities (Register, Edit, Nominate Roles) | **My Profile (Account, Roles, Nominations)** | Help

My Profile

Overview | Profile Details | **My Roles & Nominations**

Below are your user roles for each entity with which you are affiliated. You have the option to accept additional roles or request additional roles for your affiliated entities.

[Accept a Role](#) | **Request a Role**

My Roles

Role:	Name:	Status:
Officer	ABCDE Pharmaceuticals	Requested
Submitter	ABCDE Pharmaceuticals	Requested
Attester	ABCDE Pharmaceuticals	Requested

Access the Open Payments User Guide
Need help with the website? **Contact Us** by email
Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 4: Enter the Taxpayer Identification Number/Employer Identification Number (TIN/EIN) of the reporting entity that you want to associate yourself with. The TIN must be nine digits, with a dash after the second digit. Select “Find.”

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch [User Type](#)

Create Profile

- Select Profile Type
- Register Entity**
- Personal Information
- Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Entity Lookup

A field with an asterisk (*) is required.

Enter the entity's Taxpayer Identification Number (TIN)/Employer Identification Number (EIN) below to perform a search for any entities registered with the selected TIN/EIN.

If the TIN/EIN entered does not return any results, the entity has not yet been registered within the Open Payments system and you may proceed with registering the entity by selecting the "Register Your Entity on Open Payments" link.

The TIN/EIN search will return results if entities associated with TIN/EIN have been registered in the Open Payments system. If the list of entities returned does not contain the entity you wish to register with, you may proceed with registering the entity yourself by selecting "Other." If the list of entities returned contains the entity you wish to affiliate yourself with, you may select that entity and proceed with creating your profile and associating yourself with that entity.

Required: Enter the TIN/EIN you wish to be associated with.

***Enter TIN/EIN:**
99-9999999
12-3456789 **Find**

Cancel **Back**

Open Payments User Guide

Step 5: Select the correct entity from the list displayed and select “Continue.”

Note: If no reporting entity is found for the TIN/EIN you supplied, the entity has not yet been registered in the Open Payments system. You may register the entity in Open Payments yourself if you are a designated officer for the reporting entity. If you are not, or do not wish to register the entity yourself, you may contact an officer within the entity to request that he or she register the entity in the Open Payments system.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization [Switch User Type](#)

Create Profile

- Select Profile Type
- 2 Register Entity**
- 3 Personal Information
- 4 Review and Submit Profile

Entity Lookup

A field with an asterisk (*) is required.

Enter the entity's Taxpayer Identification Number (TIN)/Employer Identification Number (EIN) below to perform a search for any entities registered with the selected TIN/EIN.

If the TIN/EIN entered does not return any results, the entity has not yet been registered within the Open Payments system and you may proceed with registering the entity by selecting the "Register Your Entity on Open Payments" link.

The TIN/EIN search will return results if entities associated with TIN/EIN have been registered in the Open Payments system. If the list of entities returned does not contain the entity you wish to register with, you may proceed with registering the entity yourself by selecting "Other." If the list of entities returned contains the entity you wish to affiliate yourself with, you may select that entity and proceed with creating your profile and associating yourself with that entity.

Required: Enter the TIN/EIN you wish to be associated with.

*Enter TIN/EIN:
99-9999999
12-3456789 **Find**

For the TIN/EIN entered above, the following entities were identified:

- DEFG Medical (Entity's Registration ID: 100000235011)
- Other: I want to register a subsidiary or other affiliate with the same TIN/EIN

Cancel **Back** **Continue**

Open Payments User Guide

Step 6: Review and confirm the reporting entity information displayed on the page. If any of the entity information is incorrect, stop this process and inform a user holding the role of officer for that entity of the incorrect information. If the information is correct, select “Continue” to proceed.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization [Switch User Type](#)

Create Profile

- Select Profile Type
- Register Entity
- Entity Information**
Your Roles
- Personal Information
- Review and Submit Profile

- [Access the Open Payments User Guide](#)
- [Need help with the website? Contact Us by email](#)
- [Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)

Confirm Entity

Below is the information for your selected entity. Review and confirm the entity identified below is correct. Select "Continue" button to begin creating your user profile.

Entity's Registration ID: 100000235011

Entity's Legal Name: DEFG Medical

Reporting Entity Type: Applicable Manufacturer

Business Type: Applicable manufacturer-drugs/biological

Food & Drug Administration (FDA) Establishment Identifier:

Data Universal Numbering System (D-U-N-S® Number):

URL of Parent Company: www.cms.gov

Business Address

Country: United States

Business Address, Line 1: 7500 Security Blvd

Business Address, Line 2:

City Name: Baltimore **State:** Maryland

Zip Code: 21244 **Business Telephone Number:** 555-555-5555

Business Ownership Information

Type of Ownership: Corporation

Taxpayer Identifier Number (TIN)/Employer Identification Number (EIN): 12-3456789

Doing Business As (DBA) Name: DEFG Medical

Consolidated Report Type: No, my entity's data will not be submitted in a consolidated report

[Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

Step 7: Enter your personal information and select the roles for which you want to self-nominate. Select “Continue” to proceed.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization [Switch User Type](#)

Create Profile

- Select Profile Type
- Register Entity
 - Entity Information
 - Your Roles**
 - Personal Information
 - Review and Submit Profile

- Access** the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review** the Open Payments Privacy Policy [PDF, 102 KB]

Your Role

A field with an asterisk (*) is required.

You must nominate yourself for one or more roles in the Open Payments system. There are three user roles:

Officer:
Updates the applicable manufacturer or applicable GPO profile information and can approve and modify additional user roles.

Submitter:
Submits and edits payment information on behalf of the applicable manufacturer or applicable GPO. This can also be an individual from a third party entity submitting on behalf of the applicable manufacturer or applicable GPO.

Attester:
Attests to the accuracy, completeness, and timeliness of the data submitted for the applicable manufacturer or applicable GPO. During the attestation process, only the attester can submit assumptions made when reporting payments or other transfers of value, or ownership or investment interests.

*First Name: Mary	Middle Name:
*Last Name: Smith	Suffix (Jr., Sr., etc.):
*Business Email Address: openpayments@yopmail.com	*Business Telephone Number: 999-999-9999 555-555-5555

Indicate your role(s) in the Open Payments system. Only an authorized official or authorized representative in the officer role may manage the access level of attesters, submitters, and other officers in the system. Your role is not confirmed until the authorized official or authorized representative in the officer role has approved your nomination. You will be notified via email once your nomination has been approved.

Highest Level of Role

- Officer

Reporting-related Roles

- Submitter
- Attester

Select “Continue” to begin creating your user profile.

Open Payments User Guide

Step 8: Review the information entered in your profile. Select the “Back” button at the bottom of the page to go back and edit any incorrect information. When the information is correct, select “Continue.”

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization [Switch User Type](#)

Create Profile

- Select Profile Type
- Register Entity
- Personal Information
- Review and Submit Profile**

- Access the Open Payments User Guide
- Need help with the website? [Contact Us](#) by email
- Review the Open Payments Privacy Policy (PDF, 102 KB)

Review and Submit Profile

Review the information on this page to ensure it is correct. Select "Back" to navigate to the previous pages to correct any invalid information. Select "Continue" to submit your profile.

Entity's Registration ID: 100000235011

Entity's Legal Name: DEFG Medical

Reporting Entity Type: Applicable Manufacturer

Business Type: Applicable manufacturer-drugs/biological

Food & Drug Administration (FDA) Establishment Identifier:

Data Universal Numbering System (D-U-N-S®) Number:

URL of Parent Company: www.cms.gov

Business Address:

Country: United States

Business Address, Line 1: 7500 Security Blvd

Business Address, Line 2:

City Name: Baltimore

State: Maryland

Zip Code: 21244

Business Telephone Number: 555-555-5555

Business Ownership Information

Type of Ownership: Corporation

Taxpayer Identifier Number (TIN)/Employer Identification Number (EIN): 12-3456789

Doing Business As (DBA) Name: DEFG Medical

Is this entity part of a consolidated report (e.g., where an entity is reporting on behalf of another entity)?

No, my entity's data will not be submitted in a consolidated report

Nominations:

Role:	First Name:	Last Name:	Middle Name:	Suffix (Jr., Sr., etc.):	Business Email Address:
Officer/Submitter/Attester	Mary	Smith			openpayments@ycpmail.com

Open Payments User Guide

You will receive the following on-screen notification. A notification email will be sent to officers of the entity, informing them of your self-nomination request.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

Create Profile

- ✓ Select Profile Type
- ✓ Register Entity
- ✓ Personal Information
- ✓ Review and Submit Profile

Success Confirmed

You have successfully requested to be affiliated with DEFG Medical.

You may now: [Open Payments Home](#)

You will receive an email when your nomination is approved. You can refer to the Open Payments User Guide for further information.

Note: You will not be able to take any actions related to this profile until your nomination is approved.

-  **Access** the Open Payments User Guide
-  Need help with the website? **Contact Us** by email
-  **Review** the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

3.6f: Approving, Modifying, or Rejecting Nominations (Officers Only)

Note: If your reporting entity does not have an active user who holds the officer role with the entity in Open Payments, an individual must self-nominate for the officer role, then contact the Open Payments Help Desk for assistance. That individual will be required to provide documentation to confirm that he or she can assume the role for the entity.

If your reporting entity does have at least one active user who holds the officer role with the entity in Open Payments, that officer can follow the steps below to approve, modify, or reject self-nominations.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials, navigate to the Open Payments home page, and select the “Manage Entities” tab from the menu bar on the Open Payments landing page.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home **Submissions** (Submit, Review, Attest) **Review and Dispute** (View, Respond, Resolve) **Manage Entities** (Register, Edit, Nominate Roles) **My Profile** (Account, Roles, Nominations) **Help**

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - The program year 2015 data submission period is now open. Reporting entities may begin submitting and attesting to their data.

Reporting entities registered in a prior program year must be re-certified before any system-related actions can be performed. Review and dispute point of contact information must be provided to complete re-certification. For information on how to re-certify, refer to the quick reference guide "Applicable Manufacturer and Applicable GPO Registration and Re-Certification," located on the Resources page of the Open Payments website.

Review and dispute functionality in the Open Payments system is unavailable until April 2016.

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
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: You will see a list of all of the reporting entities you are associated with. Select the hyperlink for the entity for which you will be confirming nominations.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home Submissions Submit, Review, Attest Review and Dispute View, Respond, Resolve **Manage Entities** Register, Edit, Nominate Roles My Profile Account, Roles, Nominations Help

Manage Entities

[Register New Entity](#)

The entities you are authorized to view are listed below. Select an entity from the list below to view the entity details and manage user roles affiliated with the entity.

If an entity is pending recertification, you must complete recertification before performing any system action for that entity. Entity recertification requires that an active officer within the Open Payments system reviews, updates (as necessary), and confirms all of the entity details submitted during the previous program year.

Your Entities

Name:	Registration ID:	Status:	Date Verified:
ABCDEF Medical	10000345011	Vetted	12/14/2015 16:45:55

[Access the Open Payments User Guide](#)

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

[Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)

Open Payments User Guide

Step 3: You will be taken to the “Entity Details” tab, which displays the profile details for the reporting entity selected. Select the “Manage Roles” tab to continue with the nomination approval process.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

Home Submissions Submit, Review, Attach Review and Dispute View, Respond, Resolve Manage Entities Register, Edit, Nominate, Policy My Profile Account, Roles, Nominations Help

ABCDEF Medical

Entity Details **Manage Roles**

This page provides the information for your selected entity. Only an authorized official or authorized representative in the officer role can update any incorrect information in the entity profile by selecting the “Update Entity” button.

[Update Entity](#)

Entity Information

Entity's Registration ID: 10000345011

Entity's Legal Name: ABCDEF Medical

Reporting Entity Type: Applicable Manufacturer

Business Type: Applicable manufacturer-drugs/biologic

Food & Drug Administration (FDA) Establishment Identifier:

Data Universal Numbering System (D-U-N-S®) Number:

URL of Parent Company: www.CMS.gov/openpayments

Business Address

Country: United States

Business Address, Line 1: 7500 Security Blvd

Business Address, Line 2:

City Name: Baltimore State: Maryland

Zip Code: 21244

Business Telephone Number: 555-555-5555

Business Ownership Information

Type of Ownership: Corporation

Taxpayer Identifier Number (TIN)/Employer Identification Number (EIN): 12-1234569

Doing Business As (DBA) Name: ABCDEF Medical

Is this entity part of a consolidated report (e.g., where an entity is reporting on behalf of another entity)?
Yes, my entity's data will be submitted in a consolidated report

Points of Contact

The two identified points of contact will receive all important notification emails. Note: Entering an individual as a point of contact does not register that individual in the Open Payments system. Individuals must be registered in the system if they want to access the Open Payments system.

Primary Point of Contact

Name: Susan Jones Business Telephone Number: 555-555-5555

Title at the Entity: CEO Business Email Address: officer@yopmail.com

Backup Point of Contact

Name: John Miller Business Telephone Number: 555-555-5555

Title at the Entity: Director Business Email Address: submitter@yopmail.com

Contact Information for Review and Dispute

Contact Information:
Susan Jones
Phone: 555-555-5555
Email: Officer@yopmail.com

Recertification Information

Recertified By: Susan Jones

Date and time recertified: December 11, 2013, 16:09PM EST



Open Payments User Guide

Step 4: View the nominations waiting for approval. To approve the nominations with no changes, select “Approve” next to the name and role.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

Home **Submissions** (Submit, Review, Attest) **Review and Dispute** (View, Respond, Resolve) **Manage Entities** (Register, Edit, Nominate Roles) **My Profile** (Account, Roles, Nominations) **Help**

ABCDEF Medical

Entity Details **Manage Roles**

This page allows you to manage user roles for the entity or nominate a new role by selecting the "Nominate New Role" button below. Note: Only an authorized official or authorized representative in the officer role is able to view/edit all authorized representatives' user roles.

[Access the Open Payments User Guide](#)
[Need help with the website? Contact Us by email](#)
[Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)

[Nominate New Role](#)

Name:	Role:	Status:	Actions:
Susan Jones	Officer	Verified	Modify
Susan Jones	Submitter	Approved	Modify
Susan Jones	Attester	Approved	Modify
Mary Davis	Officer	Requested	Modify Approve
Mary Davis	Submitter	Requested	Modify Approve
Mary Davis	Attester	Requested	Modify Approve
Mary Davis	Officer	Nomination Approved	Modify
Mary Davis	Submitter	Nomination Approved	Modify
Mary Davis	Attester	Nomination Approved	Modify
John Miller	Officer	Nomination Approved	Modify
John Miller	Submitter	Nomination Approved	Modify
John Miller	Attester	Nomination Approved	Modify



Open Payments User Guide

The status will change directly on the page from “Requested” to “Approved.”

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home | Submissions (Submit, Review, Attest) | Review and Dispute (View, Respond, Resolve) | Manage Entities (Register, Edit, Nominate Roles) | My Profile (Account, Roles, Nominations) | Help

ABCDEF Medical

Entity Details | Manage Roles

This page allows you to manage user roles for the entity or nominate a new role by selecting the "Nominate New Role" button below. Note: Only an authorized official or authorized representative in the officer role is able to view/edit all authorized representatives' user roles.

Nominate New Role

Name:	Role:	Status:	Actions:
Susan Jones	Officer	Verified	Modify
Susan Jones	Submitter	Approved	Modify
Susan Jones	Attester	Approved	Modify
Mary Davis	Officer	Approved	Modify
Mary Davis	Submitter	Requested	Approve
Mary Davis	Attester	Requested	Approve
Mary Davis	Officer	Nomination Approved	Modify
Mary Davis	Submitter	Nomination Approved	Modify
Mary Davis	Attester	Nomination Approved	Modify
John Miller	Officer	Nomination Approved	Modify
John Miller	Submitter	Nomination Approved	Modify
John Miller	Attester	Nomination Approved	Modify

To modify or reject the nomination, select “Modify.”

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home | Submissions (Submit, Review, Attest) | Review and Dispute (View, Respond, Resolve) | Manage Entities (Register, Edit, Nominate Roles) | My Profile (Account, Roles, Nominations) | Help

ABCDEF Medical

Entity Details | Manage Roles

This page allows you to manage user roles for the entity or nominate a new role by selecting the "Nominate New Role" button below. Note: Only an authorized official or authorized representative in the officer role is able to view/edit all authorized representatives' user roles.

Nominate New Role

Name:	Role:	Status:	Actions:
Susan Jones	Officer	Verified	Modify
Susan Jones	Submitter	Approved	Modify
Susan Jones	Attester	Approved	Modify
Mary Davis	Officer	Approved	N/A
Mary Davis	Submitter	Approved	N/A
Mary Davis	Attester	Approved	N/A
Mary Davis	Officer	Nomination Approved	Modify
Mary Davis	Submitter	Nomination Approved	Modify
Mary Davis	Attester	Nomination Approved	Modify
John Miller	Officer	Nomination Approved	Modify
John Miller	Submitter	Nomination Approved	Modify
John Miller	Attester	Nomination Approved	Modify

Open Payments User Guide

To **modify** the nomination, change the information on the page. You may also modify the roles the user has requested by checking or unchecking each user role box accordingly.

To remove all user roles associated with the individual and thereby **reject** the nomination, contact the Open Payments Help Desk. Note: the Help Desk may request documentation to confirm this activity. An officer cannot modify a user's nomination once it has been approved.

Once you have modified the nomination, select "Submit."



The screenshot displays the 'Open Payments (Sunshine Act)' web application. At the top, there is a navigation bar with tabs for 'Home', 'Submissions', 'Review and Dispute', 'Manage Entities', and 'My Profile'. Below this, the user is logged in as 'ABCDEF Medical'. The main content area is titled 'Entity Details' and 'Manage Roles'. The user's name is 'Susan Jones'. The form includes fields for 'First Name', 'Last Name', 'Business Email Address', 'Business Telephone Number', 'Middle Name', and 'Suffix (Jr., Sr., etc.)'. There are also fields for 'Business Address, Line 1', 'Business Address, Line 2', 'City Name', 'State', and 'Zip Code'. A section titled 'Indicate the role or roles this person will have:' contains three checkboxes: 'Officer', 'Submitter', and 'Attester', all of which are checked. A 'Submit' button is located at the bottom right of the form.

If the officer approved a self-nomination, an email notification will be sent to the self-nominator informing them that their self-nomination has been approved or modified. If the officer approved a nomination made by an individual who was not the nominee, then the nominee will now receive an email notification that they have been nominated for a user role in the Open Payments system.

Section 3.7: Vetting

Vetting is the process of verifying an applicable manufacturer's or applicable GPO's corporate identity. This is done to ensure that the applicable manufacturer or applicable GPO is a valid reporting entity. All applicable manufacturers and applicable GPOs registering in the Open Payments system will be vetted. Vetting occurs once the authorized official has completed his or her profile and submitted his or her registration in the Open Payments system. **Note that reporting entity registration is not considered complete until the vetting process has been successfully completed.**

3.7a: Entity Vetting

Vetting of an applicable manufacturer or applicable GPO is an automated process. The automated vetting process will typically require little action from the user in order to complete it. Once the

Open Payments User Guide

authorized official submits the reporting entity and user profile, the vetting process begins. The process will attempt to vet the entity using the information provided in the entity profile.

If the vetting fails, the authorized official will be notified via email and will have the opportunity to correct the information and resubmit the entity for vetting. The authorized official will have three attempts to successfully complete the automated vetting process for the entity. If the vetting fails three times, the authorized official will need to contact the Open Payments Help Desk to receive a “Conditionally Active” status in order to gain access to the Open Payments system. “Conditionally Active” status is given on a discretionary basis by the Open Payments Help Desk. This status will allow the authorized official and additional users to perform tasks within the system to remain compliant with the program, though it will be noted that the entity could not be successfully vetted.

If the authorized official believes all of the information provided in the entity profile is correct and the entity should have been successfully vetted, the authorized official can contact the Open Payments Help Desk at any time during the vetting process for assistance at openpayments@cms.hhs.gov or 1-855-326-8366.

Note: If the Open Payments Help Desk does not assign the entity the “Conditionally Active” status, the entity vetting status will remain as “Failed Vetting” in the Open Payments system and users associated with the reporting entity will not be able to perform any action in the system.

3.7b: Vetting Timeframe

The automatic vetting process normally takes a short time, but is dependent on the information provided by the user and the number of reporting entities undergoing vetting at the same time. CMS encourages authorized officials to register and begin the vetting process as early as possible to allow sufficient time for vetting to be completed.

Data Submission and Attestation

Chapter 4: Data Submission and Attestation

This chapter on data submission and attestation provides detailed information on how applicable manufacturers and applicable GPOs are able to submit payments or other transfers of value, and ownership or investment interests information, to the Open Payments system. The Open Payments system provides two data entry and submission options: (1) bulk data entry via character-separated value (CSV) files, or a ZIP file that contains CSV files for both individual and consolidated reports; and (2) manual data entry via a Graphic User Interface (GUI).

This chapter is divided into the following sections:

- **Data Submission** contains information on data submission for the Open Payments system.
- **Preparing Your Data** contains information on how to prepare data files, payment types, and location of data submission resources.
- **Bulk File Upload** contains information and instructions for the preparation and upload of CSV files (or ZIP file containing CSV files) for submission through the Open Payments system.
- **Manual Data Entry Using the Graphic User Interface** contains information about submitting information to the Open Payments system through a graphical user interface (GUI). **Record Validation and Matching** contains information about how submitted records are verified in the Open Payments system for accuracy.
- **Correcting Validation and Matching Errors** contains information about how to understand error reporting and how to correct errors in submitted records.
- **Deleting Records** contains information about how to delete individual records and entire CSV files.
- **Final Submission of Data** contains information about the final data submission process after all records are uploaded and ready for submission.
- **Delay in Publication** contains information about the requirements and rules for requesting delays in publication for certain types of records.
- **Consolidated Reporting** contains information about reporting entities under common ownership having their data collectively submitted by one entity in the group in consolidated reports.

- **Third Party Data Submitters** contains information about the use of third parties by reporting entities to submit data to the Open Payments system.
- **Attestation and Assumptions** contains information about the attestation to the accuracy of data submitted to Open Payments.

Section 4.1: Overview of Data Submission and Attestation

The Open Payments program requires applicable manufacturers and applicable GPOs to submit detailed information regarding payments or other transfers of value made to physicians and teaching hospitals, and attest to the accuracy of that data. To complete these tasks, reporting entities must first upload their data to the Open Payments system. Once the data has been successfully uploaded, it must undergo final submission. After final submission, the reporting entity must legally attest to the accuracy of the data. Finally, after attestation, the data will be made available for physicians and teaching hospitals to review and dispute.

Figure 4.1 provides an overview of the data submission and attestation process.

Figure 4.1: The Four Steps of Data Submission and Attestation



Notes:

- Applicable manufacturers and applicable GPOs must maintain all books, contracts, records, documents, and other evidence sufficient to enable the audit, evaluation, and inspection of the reporting entity's compliance for five years from the date of publication.
- Data reporting is complete only after electronic attestation is received for the program year.
- To assist with the preparation of data for submission, CMS has made resources available to help reporting entities confirm physician and teaching hospital identifying information. Physician identifying information can be found in the Validated Physician List, which can be downloaded from the "Submissions" page of the Open Payments system. Teaching hospital identifying information can be found in the Teaching Hospital list, which can be downloaded from the Resources page of the Open Payments website at <http://www.cms.gov/OpenPayments/About/Resources.html>.

Section 4.2: Data Submission

The data submission process requires reporting entities to submit detailed information regarding payments or other transfers of value made to physicians and teaching hospitals, and then attest to the accuracy of the data. Reporting entities will submit data either through bulk file upload or manual data entry. Both submission options are covered later in this chapter.

Open Payments User Guide

Only individuals holding the role of submitter may submit the data in the Open Payments system, and only individuals holding the role of attester may attest to the data. To perform data submission, users in the role of submitter should:

- Perform test file uploads and submit data files to validate the file structure;
- Use the error report generated by the Open Payments system to fix any data errors in submitted files; and finally
- Perform final data submission.

Then, the attester can attest to the accuracy of the submitted data. All submission activities must be completed before the close of the data submission period for that program year. Resources related to data submission can be found on the Resources page of the Open Payments website at <http://www.cms.gov/OpenPayments/About/Resources.html>.

Section 4.3: Preparing Your Data

Chapter 2 of this User Guide presents detailed descriptions of the information that must be collected for reporting by reporting entities. This section provides guidance on preparing data for submission. Sections 4.4 and 4.5 provide details on how to submit the collected data through bulk upload and manual data entry, respectively.

4.3a: Covered Recipient Demographic Resources

Prior to data submission, check the demographic information for each physician, teaching hospital, or principal investigator included in the records to ensure that it is current and accurate. To assist with this validation, CMS provides the Validated Physicians List and the CMS Teaching Hospital List.

- The Validated Physicians List contains **only** information on physicians with an NPI 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 within the Open Payments system, on the “Submissions” page on the “Submissions” tab.
 - Physicians who do **not** appear on the VPL may still be successfully matched. The VPL is merely a tool to help prepare records. Check the National Plan and Provider Enumeration System (NPPES) for information on physicians you cannot find on the VPL. If you cannot find the physician’s information on the VPL or NPPES, contact the physician directly.
- 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. For program year 2013 records, use the hospital’s legal business name as the hospital name. For program years 2014 and later, use the hospital’s “Doing Business As” name as the hospital name. In the Teaching Hospital List, the “Doing Business As” name is under the heading of “Hospital Name.” The address should be the “NPPES Business Address.”

Open Payments User Guide

Another key resource on the Resources page is the “Submission Data Mapping Document,” which maps each data element in Open Payments records to the appropriate CSV field names. The “Data Element Name”, “Column B” in the “Submission Data Mapping Document,” can be mapped to the “CSV Element Name” column of the template. You may also use this document as a guide when entering payments manually.

Section 4.4: Bulk File Upload

The Open Payments system allows applicable manufacturers and applicable GPOs to submit payment or other transfers of value, and ownership or investment interest information via bulk file uploads. Files can be submitted as an individual entity submitting a single report or as a consolidated report on behalf of multiple entities (see Section 4.11 for information on Consolidated Reporting).

Character-Separated Value (CSV) is the only file format accepted by the Open Payments system for bulk data files. ZIP files are permissible if they contain only CSV files. CSV files must be prepared and formatted properly for successful submission. See Section 4.4a for guidance.

Submitted bulk files may not exceed 250MB in size. If the data in your file exceeds that limit, you can split the data into more than one file or compress the CSV file into a ZIP file. A ZIP file containing compressed CSV files must be under 250MB after compression.

There are no system limitations to the number of data lines or rows that can be included in a file.

4.4a: Creating CSV Files

CSV sample files, also called CSV templates, are available on the Resources page of the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>. The templates define the exact format and layout of the files accepted in the Open Payments system. The sample files correspond to the three reporting categories.

- 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 correct sample file must be used for the corresponding reporting category (i.e., general payments records must be in general payments sample file format, etc.). Data entered for the records must conform to the restrictions for the data fields given in the “Submission Data Mapping Document.” The “Submission Data Mapping Document” is also available on the Resources page of the Open Payments website.

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The delimiter for CSV files for Open Payments submission files is a pipe (|). Therefore, when creating CSV files for Open Payments using Excel on a Windows-based computer, you must first update the computer's regional settings to display "pipe" as the field delimiter instead of "comma." You can find the regional settings in your computer's Control Panel under *Region and Language -> Additional Settings -> List Separator*. Once this is complete, you can then create the pipe by holding down the shift key and selecting backslash (i.e., "\"). Note that this "regional setting" change is not necessary when using Open Office.

To create a CSV using Excel on a Windows-based computer, load an applicable CSV sample file downloaded from the Open Payments website. Next, enter required data within the columns, "auto-fit" the columns to make all data visible to ensure the data is entered correctly, and save the file. Be sure to save the file in the file format of "CSV" (Excel default is either ".XLS" or ".XLSX").

To create a CSV using Open Office on either a Macintosh or Windows-based computer, first open the sample file downloaded from the Open Payments website. When the Text Import window opens, one of the options you will see is "Separators." Ensure that the button for "Other" is checked and select the "shift" and "\" keys to create the pipe as the separator in the "Other" field. Once this is done, enter required data within the columns. Ensure all data has been entered correctly and save the file. You must save the file as a CSV file.

Whether you are using Excel or Open Office, it is important to perform the following final checks before submitting your file:

- Open the CSV file in a text editor (Notepad for Windows, Text Editor for Macintosh) and confirm that the rows are delimited with pipes; and
- Ensure that rows of data are not contained within quotation marks to avoid the data being rejected by the system.

Applicable manufacturers and applicable GPOs can submit test submissions to test the validity of the format of the files being uploaded. This function is provided solely for the purposes of ensuring submission files follow the correct submission format. Test data is not retained in the system and is not included in the data submission. Details regarding the submission of a test file will be covered in the next section.

Open Payments User Guide

4.4b: Bulk File Upload Instructions

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials, navigate to the Open Payments home page, and select the “Submissions” tab.

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Manufacturer or Group Purchasing Organization [Switch User Type](#)

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Welcome to the Open Payments System

Announcements

2015 Program Year General Information - The program year 2015 data submission period is now open. Reporting entities may begin submitting and attesting to their data.

Reporting entities registered in a prior program year must be re-certified before any system-related actions can be performed. Review and dispute point of contact information must be provided to complete re-certification. For information on how to re-certify, refer to the quick reference guide "Applicable Manufacturer and Applicable GPO Registration and Re-Certification," located on the Resources page of the Open Payments website.

Review and dispute functionality in the Open Payments system is unavailable until April 2016.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

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
- Review** the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: You will be brought to the "Submissions" page. Select the "Bulk File Upload" option to begin the bulk upload process.

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- Review and Dispute
View, Respond, Resolve
- Manage Entities
Register, Edit, Nominate
Roles
- My Profile
Account, Roles, Nominations
- Help

Submissions

A field with an asterisk (*) is required.

Applicable manufacturers and applicable group purchasing organizations (GPOs) must submit payments, other transfers of value, and ownership or investment interests to the Open Payments system.

Data Submission

Users who hold the role of submitter can submit information about payments, other transfers of value, and ownership or investment interests to the Open Payments system via bulk file upload or manual data entry.

Bulk file upload allows you to submit multiple records in a single CSV file. Manual data entry allows you to submit records manually using the Open Payments system graphic user interface (GUI) rather than creating a data file.

Select Data Submission Method:

Select your preferred method of data submission below.

Bulk File Upload

Manual Data Entry

Review Submitted Records

Once data has been submitted, any active user associated with that entity can review all records submitted for that entity. To review records, select the name of the entity whose records you wish to review and the program year for the records from the dropdown lists below, then select "Review Records."

*Select Entity: *Select Program Year: [Review Records](#)

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Download Physician List

The Validated Physician List below should not be shared publicly.

[Validated Physician List](#)

Download the Reporting Templates

The most recent versions of the reporting template files are below.

CSV Templates

- [Open Payments Research Template.csv](#)
- [Open Payments General Template.csv](#)
- [Open Payments OwnerInvestor Template.csv](#)

Download All Templates

[Open Payments Templates](#)

Open Payments User Guide

Step 3: Select the payment category for the type of file being submitted: general, research, or ownership/investment interests. Then select the reporting entity for which you will be uploading the files and the program year of the data. Select the “Browse” button to find and select the file to be uploaded.

Note: You may only submit one data file at a time. If you have multiple files to upload, repeat the bulk upload process for each file.

Once you have selected a file for upload, you may select from two buttons: “Submit as Test File” or “Submit File to Open Payments.”

Files submitted as test files are not uploaded for reporting purposes or stored in the Open Payments system. The system only checks the file to ensure the file format is either CSV or ZIP. The Open Payments system will display test results on the page.

To upload the file for record processing to the Open Payments system, select the “Submit File to Open Payments” button.

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Upload Payments

A field with an asterisk (*) is required.

To submit your payment file follow the steps identified below. Prior to uploading your payment file, ensure that the file is in a valid file format (.csv or .zip) and conforms to the file specifications. If needed, you may download the latest Open Payments submissions sample files available on the right side of the page.

1. Select the appropriate payment category, entity, and program year for which your payments apply.
2. Select the “Browse” button to locate and select your file.

Once the file is selected, you have the option to submit as a test file or directly to the Open Payments system. Note that submitting your file as a test will verify that the file is correctly formatted, but the records will not be saved in the Open Payments system for review. Submitting as a test file is an optional step. If you select the “Submit File to Open Payments” button, in addition to validating the file format, the records within the file will be submitted for validation and will be viewable within the Open Payments system.

When you upload a payment file, you must first identify the payment category. You can upload more than one file, but no file can be larger than 250 MB.

*Payment Category: General Payments

*Entity: ABCDEF Medical

*Program Year: 2015

*File: Choose File CSV-Sampl...2015.csv

Must be a valid .csv or .zip file. Maximum of 250MB per file.

Submit as Test File

Submit File to Open Payments

Cancel

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Download All Templates

Open Payments Templates

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Upon upload, the file will undergo three sets of checks. First, the file will be checked to ensure it is a correct file type, within the size limit, and that the file contains the appropriate header row for the payment category selected at upload (e.g., a file uploaded as a general payments file contains the header row for general payments records).

The records within the file will then undergo validation, where the system will check if the information contained in the records adheres to the size and character rules for the Open Payments system. These rules are given in the “Submission Data Mapping Document,” which is available on the Resources page of the Open Payments website (<https://www.cms.gov/OpenPayments/About/Resources.html>).

After the records are validated, they undergo matching. During this process, the Open Payments system compares the identifying information for physicians, teaching hospitals, and principal investigators in each record to corresponding identifying information within CMS resources. If the identifying information matches, the record passes. If it does not, the record fails.

You will receive an email notification if records did not pass validation or matching. See Section 4.6 for more information on the validation, matching, and error correction process. Records that failed validation and/or matching cannot proceed to final submission. See Section 4.7 for details on record correction and resubmission. You may check the status of your upload at any time via the “Review Records” page. Records in the submission process will be in one of the following statuses:

- System Processing - Records which the Open Payments system is still processing and validating.
- Ready for Submission - Records which are successfully validated and matched, and ready for final submission.
- Failed Validation - Records which did not pass field validation checks.
- Failed Matching Validation - Records which were not successfully matched to a valid covered recipient.

Take note that once the data has been uploaded to the system and undergone these checks, it still must undergo the final submission process in the Open Payments system. Performing bulk file upload only uploads the file and checks each record to ensure that it adheres to a valid data format and matching requirements. You must complete the final submission and attestation process for the data to be considered reported. See Section 4.9 for details on final submission and Section 4.13 for details on attestation.

Section 4.5: Manual Entry Using the Graphic User Interface (GUI)

The Open Payments system provides the ability to enter information regarding individual payments or other transfers of value through an online interface.

The “Submission Data Mapping Document,” available on the Resources page of the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>, provides guidance and descriptions on each of the fields that will be entered during the manual data entry process. Have this document available during manual entry for reference.

4.5a: Manual Entry of General Payments

To enter general payments data manually, follow these steps:

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials, navigate to the Open Payments home page, and select the “Submissions” tab from the landing page.

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Welcome to the Open Payments System

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Step 2: Select “Manual Data Entry” from the “Submissions” page.

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Submissions

A field with an asterisk (*) is required.

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Bulk file upload allows you to submit multiple records in a single CSV file. Manual data entry allows you to submit records manually using the Open Payments system graphic user interface (GUI) rather than creating a data file.

Select Data Submission Method:

Select your preferred method of data submission below.

[Bulk File Upload](#)

[Manual Data Entry](#)

Review Submitted Records

Once data has been submitted, any active user associated with that entity can review all records submitted for that entity. To review records, select the name of the entity whose records you wish to review and the program year for the records from the dropdown lists below, then select “Review Records.”

*Select Entity: *Select Program Year: [Review Records](#)

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Download Physician List

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[Validated Physician List](#)

Download the Reporting Templates

The most recent versions of the reporting template files are below.

CSV Templates

- [Open Payments Research Template.csv](#)
- [Open Payments General Template.csv](#)
- [Open Payments OwnerInvestor Template.csv](#)

Download All Templates

[Open Payments Templates](#)

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Step 3: On the “Enter Records Manually” page, use the drop-down menus to select the Payment Category, Entity Name, and Program Year. You may enter the Home System Payment ID (if applicable) of the record you will submit. “Home System Payment ID” is the identifier associated with the payment transaction in your home system. Select “Continue” to proceed.

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Enter Records Manually

A field with an asterisk (*) is required.

To enter a payment, transfer of value, or ownership or investment interest enter the following information below:

- Payment Category - select the appropriate payment category
- Entity - select the Applicable Manufacturer or Applicable GPO which made the payment
- Program Year - select the program year that the payment, transfer of value, or ownership or investment interest was made
- Home System Payment ID - optionally enter an internal identifier that corresponds to your system

*Payment Category: General Payments

*Entity: ABCDEF Medical

*Program Year: 2015

Home System Payment ID:

Cancel Continue

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Open Payments User Guide

Step 4: Select the covered recipient type: Physician or Teaching Hospital.

The next few pages will differ depending on the covered recipient type selected.

For teaching hospitals: Enter information as requested on the page below. Required fields are marked with asterisks. When you have entered all of your information, select “Continue.”

On the “Covered Recipient Demographic Information” page, users can access the teaching hospital list for the applicable program year via the link provided to the CMS Open Payments website. This list, vetted and compiled by CMS, contains identifying information for teaching hospitals and is updated annually. Refer to the list to ensure you have complete and accurate identifying information for a teaching hospital for a given program year. You can also go directly to the Resources page of the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html> to view the teaching hospital list. The name entered in the “Teaching Hospital Name” field should match the name listed in the “Hospital Name” field of the teaching hospital list (also known as the “Doing Business As” (DBA) name), unless the record is for program year 2013, in which case the hospital’s legal name from the 2013 teaching hospital list should be used. The address should be the “NPPES Business Address.”

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Covered Recipient Demographic Information

A field with an asterisk (*) is required.

Select the recipient type for the payment, other transfer of value, or ownership or investment interest being made. Then enter the demographic information.

Note: Once a record has undergone final submission, the covered recipient identifying information in that record (e.g., physician first name and last name, NPI, license information) is locked and cannot be edited. To change covered recipient identifying information in a record that has undergone final submission, you must delete the original record and submit a new record with updated covered recipient identifying information.

To assist with filling out this page, CMS has provided a Teaching Hospital List and a Validated Physician List. You can use them to find correct information when preparing your payment data.

- The Teaching Hospital List is on the [CMS Open Payments website](#). The list is updated annually and can be searched by program year. If a teaching hospital you want to cite as a covered recipient does not appear on the Teaching Hospital List, contact the Open Payments Help Desk openpayments@cms.hhs.gov for assistance.
- The Teaching Hospital Lists for all program years are available on the CMS Open Payments website at www.cms.gov/openpayments.
- If a payment or other transfer of value was made to a teaching hospital that does not appear on the Teaching Hospital List for the year in which the payment was made, the payment or other transfer of value does not have to be reported.
- For program year 2013, submitted records must use the Legal Business Name (listed as "PECOS Legal Business Name" in the Teaching Hospital List) of that hospital in the Teaching Hospital Name field. For all subsequent program years, submitted records must use the Doing Business As Name (listed as "Hospital Name" in the Teaching Hospital List) in the Teaching Hospital Name field.
- The Validated Physician List can be found on the Submissions page of the Open Payments system. This list contains first and last names (with variations), NPIs, and state license numbers for physicians who have been reported upon in the Open Payments system. CMS encourages applicable manufacturers and GPOs to use the list to avoid inconsistencies in reporting. This list should not be shared publicly.

*Covered Recipient Type:
Teaching Hospital

*Teaching Hospital Name:
EFGH Teaching Hospital

*Teaching Hospital Taxpayer ID Number (TIN):
This is a 9-digit number
123456789

*Recipient Country:
United States

*Recipient Business Street Address, Line 1:
7500 Security Blvd

Recipient Business Street Address, Line 2:

*Recipient City:
Baltimore

*Recipient State:
Maryland

*Recipient Zip Code:
99999 9999
21244

Recipient Email Address:

Open Payments User Guide

For physicians: Enter information as requested on the page below. Required fields are marked with asterisks. For a list of the available physician taxonomy codes, refer to the Medicare Provider/Supplier to the [Healthcare Provider Taxonomy list in Appendix C](#). When you have entered all of your information, select “Continue.”

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Covered Recipient Demographic Information

A field with an asterisk (*) is required.

Select the recipient type for the payment, other transfer of value, or ownership or investment interest being made. Then enter the demographic information.

Note: Once a record has undergone final submission, the covered recipient identifying information in that record (e.g., physician first name and last name, NPI, license information) is locked and cannot be edited. To change covered recipient identifying information in a record that has undergone final submission, you must delete the original record and submit a new record with updated covered recipient identifying information.

To assist with filling out this page, CMS has provided a Teaching Hospital List and a Validated Physician List. You can use them to find correct information when preparing your payment data.

- The Teaching Hospital List is on the CMS Open Payments website. The list is updated annually and can be searched by program year. If a teaching hospital you want to use as a covered recipient does not appear on the Teaching Hospital List, contact the Open Payments Help Desk, openpayments@cms.hhs.gov for assistance.
- The Teaching Hospital Lists for all program years are available on the CMS Open Payments website at www.cms.gov/openpayments.
- If a payment or other transfer of value was made to a teaching hospital that does not appear on the Teaching Hospital List for the year in which the payment was made, the payment or other transfer of value does not have to be reported.
- For program year 2015, submitted records must use the Legal Business Name (listed as "PEODS Legal Business Name" in the Teaching Hospital List) or that hospital in the Teaching Hospital Name field. For all subsequent program years, submitted records must use the Group Business As Name (listed as "Hospital Name" in the Teaching Hospital List) in the Teaching Hospital Name field.
- The Validated Physician List can be found on the Submitters page of the Open Payments system. The list contains first and last names (with initials), NPIs, and state license numbers for physicians who have been reported upon in the Open Payments system. CMS encourages applicable manufacturers and GPOs to use the list to avoid inconsistencies in reporting. This list should not be shared publicly.

Covered Recipient Type: Physician

Physician First Name: Robert
Physician Middle Name:

Physician Last Name: Miller
Physician Name Suffix:

Recipient Country: United States

Recipient Business Street Address, Line 1: 750 Security Blvd
Recipient Business Street Address, Line 2:

Recipient City: Baltimore
Recipient State: Maryland

Recipient Zip Code: 21204 21244
Recipient Email Address:

Physician Primary Type: Medical Doctor

Physician NPI: This is a 10-digit number
1234567890

To obtain the taxonomy code for the Physician, refer to the Medicare Provider/Supplier to Healthcare Provider Taxonomy list. This list, accessed through the Open Payments User Guide, contains all of the taxonomy codes that can be entered into the system. Taxonomy codes not on the list cannot be entered into the system. If you cannot find an exact match from the list, choose the taxonomy code that best identifies the Physician as a health care provider.

Physician Taxonomy Code: 209C0000X

To enter your license information, select the state and license number in the fields below. Select "Add" when finished. Enter each state and license number separately until all licenses have been added. You must add at least 1 license number and may add up to 5. You may edit or delete any previously entered license information by selecting the "Edit" or "Delete" buttons.

License State:	License Number:	Actions:
Maryland	1234567890	Edit

Add **Cancel** **Back** **Continue**

Open Payments User Guide

Step 5: Enter product information. Select the appropriate value in the “Product Indicator” field: covered, non-covered, none, or combination. “Covered” is to be used when reporting only payments or other transfers of value related to covered drugs, biologicals, devices, or medical supplies. “Non-covered” is to be used when reporting payments or other transfers of value related to only non-covered drugs, biologicals, devices, or medical supplies. “None” is to be used when the reported payment was not made in relation to a drug, biological, device, or medical supply. “Combination” is to be used when reporting payments or other transfers of value related to a combination of both covered and non-covered drugs, biologicals, devices, or medical supplies.

Enter National Drug Codes (NDCs) for up to five covered drugs or biologicals to be included in this record. NDCs are unique identifiers with 12 characters and must be in one of the following formats:

- 9999-9999-99
- 99999-999-99
- 99999-9999-9

NDCs entered that do not match one of these three formats will not be accepted. NDCs can be found on the [U.S. Food and Drug Administration’s website at http://www.accessdata.fda.gov/scripts/cder/ndc/default.cfm](http://www.accessdata.fda.gov/scripts/cder/ndc/default.cfm).

Enter the names of the drugs or biologicals associated with those NDCs in the table on the top left of the page. If you are submitting information for covered devices or medical supplies, provide their names in the fields on the bottom left of the page. Note: for every NDC entered, you **must** provide a corresponding “Name of Associated Covered Drug or Biological.” If more than one NDC is provided, their order must match the order of the named covered drug or biological. For example, if an NDC code is entered in the first “NDC of Associated Covered Drug or Biological” field, the drug name must be entered in the first “Name of Associated Covered Drug or Device” field.

Once all information is entered, select “Continue.”

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Enter Payments Manually

- ✓ Recipient Demographic Information
- 2 Associated Drug, Device, Biological, or Medical Supply Information**
- 3 Transfer of Value (Payment) Information
- 4 General Record Information
- 5 Review and Submit

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- Review** the Open Payments Privacy Policy [PDF, 102 KB]

Associated Drug, Device, Biological, or Medical Supply Information

A field with an asterisk (*) is required.

Select the product indicator from the drop-down menu and then enter the applicable information for the associated covered drugs, devices, biologicals, or medical supplies. If you select "Covered" or "Combination" from the drop-down menu, you must enter the name of an associated covered drug or biological, or the name of the associated covered device or medical supply. If you are entering multiple drugs, biologicals, devices, or medical supplies, do not skip fields between each entry, including the first field (e.g., if you have two items, they must be entered in the first and second fields). If the National Drug Code (NDC) of the associated covered drug or biological is available, you are required to enter it. Note that if you enter an NDC, you are also required to enter the corresponding Name of Associated Covered Drug or Biological field. When done, select the "Continue" button.

*Product Indicator:
Covered

*Required: Enter the name of the associated covered drug or biological, or name of the associated covered device or medical supply.

Name of Associated Covered Drug or Biological:	National Drug Code (NDC) of Associated Covered Drug or Biological: 9999-9999-99 OR 99999-999-99 OR 99999-9999-9
1. Test Drug	1. 9999-9999-99
2.	2.
3.	3.
4.	4.
5.	5.

Name of Associated Covered Device or Medical Supply:

-
-
-
-
-

Cancel Back **Continue**

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Step 6: Enter payment information in the required fields: total amount of payment, date of payment, the number of payments included in the total amount, the form of payment or other transfers of value, and the nature of payment or other transfers of value. Note that only positive dollar values are allowed when reporting payment amounts; negative dollar values and zeros are not permitted. Once all information is entered, select “Continue.”

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Enter Payments Manually

- ✓ Recipient Demographic Information
- ✓ Associated Drug, Device, Biological, or Medical Supply Information
- 3 Transfer of Value (Payment) Information**
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- 5 Review and Submit

General Payment or Other Transfer of Value Information

A field with an asterisk (*) is required.
Enter the required payment or transfer of value information. When done, select "Continue" button.

Applicable Manufacturer or Applicable GPO Making Payment Name:
ABCDEF Medical

Applicable Manufacturer or Applicable GPO Making Payment Registration ID:
10000345011

***Total Amount of Payment:** 99999.99 and maximum 12 digits
5000

***Date of Payment:** yyyyymmdd
20150401

***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

Open Payments User Guide

Step 7: Enter general payment or other transfer of value information.

The “Contextual Information” text box is a free-form text field where you can enter any information you deem helpful or appropriate regarding the payment or other transfers of value. The text field has a limit of 500 characters. All special characters found on a standard U.S. keyboard can be used in the text box, not including ALT+NUMPAD ASCII Key characters.

If the “Delay in Publication of Research Payment” field is set to request a delay in publication, the “Contextual Information” box must include the name of the relevant research study. Select the “Continue” button to proceed.

The screenshot displays the 'Open Payments (Sunshine Act)' web application interface. At the top, there is a navigation bar with tabs for Home, Submissions (with sub-links: Submit, Review, Attest), Review and Dispute (with sub-links: View, Respond, Resolve), Manage Entities (with sub-links: Register, Edit, Nominate, Roles), My Profile (with sub-links: Account, Roles, Nominations), and Help. Below the navigation bar, the main content area is titled 'General Payment or Other Transfer of Value Information'. On the left side, there is a sidebar with a section 'Enter Payments Manually' containing a list of steps: 1. Recipient Demographic Information, 2. Associated Drug, Device, Biological, or Medical Supply Information, 3. Transfer of Value (Payment) Information (highlighted), 4. General Record Information, and 5. Review and Submit. Below this list are three utility links: 'Access the Open Payments User Guide', 'Need help with the website? Contact Us by email', and 'Review the Open Payments Privacy Policy [PDF, 102 KB]'. The main form area contains the following fields and instructions: 'Applicable Manufacturer or Applicable GPO Making Payment Name:' with the value 'ABCDEF Medical'; 'Applicable Manufacturer or Applicable GPO Making Payment Registration ID:' with the value '100000345011'; '*Total Amount of Payment:' with a value of '5000' and a note '99999.99 and maximum 12 digits'; '*Date of Payment:' with a value of '20150401' and a note 'yyyymmdd'; '*Number of Payments Included in Total Amount:' with a value of '1'; '*Form of Payment or Transfer of Value:' with a dropdown menu showing 'Cash or cash equivalent'; and '*Nature of Payment or Transfer of Value:' with a dropdown menu showing 'Consulting Fee'. At the bottom of the form, there are three buttons: 'Cancel', 'Back', and 'Continue' (which is highlighted with a red circle).

Open Payments User Guide

Step 8: Enter general record information.

The “Contextual Information” text box is a free-form text field where you can enter any information you deem helpful or appropriate regarding the payment or other transfers of value. The text field has a limit of 500 characters. All special characters found on a standard U.S. keyboard can be used in the text box, not including ALT+NUMPAD ASCII Key characters.

If the “Delay in Publication of Research Payment” field is set to request a delay in publication, the “Contextual Information” text box must include the name of the relevant research study. Once all information is entered, select “Continue to Review.”

The screenshot shows the 'Open Payments (Sunshine Act)' interface. At the top, there is a navigation bar with tabs for Home, Submissions (with sub-links for Submit, Review, and Attest), Review and Dispute (View, Respond, Resolve), Manage Entities (Register, Edit, Nominate, Roles), My Profile (Account, Roles, Nominations), and Help. Below the navigation bar, the main content area is titled 'General Record Information'. A sidebar on the left, under 'Enter Payments Manually', lists several steps: Recipient Demographic Information, Associated Drug, Device, Biological, or Medical Supply Information, Transfer of Value (Payment) Information, General Record Information (which is currently selected and highlighted with a blue bar and the number 4), and Review and Submit (highlighted with the number 5). Below the sidebar, there are three utility links: 'Access the Open Payments User Guide', 'Need help with the website? Contact Us by email', and 'Review the Open Payments Privacy Policy [PDF, 102 KB]'. The main form area contains the following fields: 'Third Party Payment Recipient Indicator' (dropdown menu with 'No Third Party Payment' selected), 'Charity Indicator' (dropdown menu with 'No' selected), and 'Delay in Publication of Research Payment Indicator' (dropdown menu with 'No Delay Requested' selected). Below these is a 'Contextual Information' text box. At the bottom of the form, there are three buttons: 'Cancel', 'Back', and 'Continue to Review' (which is highlighted with a red oval).

Open Payments User Guide

Step 9: Review the payment information entered in the previous pages. If necessary, select the “Back” button at the bottom of the page to go back and edit information. Once the record is accurate, select “Save Record” to continue.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

Home Submissions **Review and Dispute** Manage Entities My Profile Help
View, Respond, Resolve Register, Edit, Nominate Roles Account, Roles, Nominations

Enter Payments Manually

- ✓ Recipient Demographic Information
- ✓ Associated Drug, Device, Biological, or Medical Supply Information
- ✓ Transfer of Value (Payment) Information
- ✓ General Record Information
- Review and Submit**

- Access the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Review and Save Page

Review the information for the payment or transfer of value. When done, select the “Save Record” button.

Payment Submission Information

Payment Category: General Payments
Entity: ABCDEF Medical
Program Year: 2015
Home System Payment ID:

Covered Recipient Demographic Information

Covered Recipient Type: Teaching Hospital
Teaching Hospital Name: EFGH Teaching Hospital
Teaching Hospital Taxpayer ID Number (TIN): 123456789
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 Email Address:

Associated Drug, Device, Biological, or Medical Supply Information

Product Indicator: Covered
Name of Associated Covered Drug or Biological: 1 Test Drug
National Drug Code (NDC) of Associated Covered Drug or Biological: 1 9999 9999 99
Name of Associated Covered Device or Medical Supply:

General Payment or Other Transfer of Value Information

Applicable Manufacturer or Applicable GPO Making Payment Name: ABCDEF Medical
Applicable Manufacturer or Applicable GPO Making Payment Registration ID: 10000345011
Total Amount of Payment: \$5,000.00 Date of Payment: 20150401
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

Third Party Payment Recipient Indicator: No Third Party Payment
Name of Third Party Entity Receiving Payment or Transfer of Value:
Charity Indicator: No
Third Party Equals Covered Recipient Indicator:
Delay in Publication of Research Payment Indicator: No Delay Requested
Contextual Information:

Cancel Back **Save Record**

Open Payments User Guide

A confirmation message will be displayed on-screen to confirm that the record of the payment or other transfer of value has been saved and is being processed.

The screenshot displays the 'Open Payments (Sunshine Act)' web application interface. At the top, there is a navigation menu with the following items: Home, Submissions (with sub-links: Submit, Review, Attest), Review and Dispute (with sub-link: View, Respond, Resolve), Manage Entities (with sub-links: Register, Edit, Nominate, Roles), My Profile (with sub-links: Account, Roles, Nominations), and Help. Below the navigation menu, the main content area features a large heading 'Record Saved Successfully'. Underneath this heading, a message states: 'You have successfully saved a record for 2015, General Payments - ABCDEF Medical. To view your record detail select "Go to Review Records" button. To add a new record, select "Add Another Record" button.' A note follows: 'Note: Entering a payment or transfer of value and saving the record is not considered a "final submission". The final submission of an entity's payments or transfers of value must be attested by the entity's attester.' Two yellow buttons are provided: 'Add Another Record' and 'Go to Review Records'. On the right side of the page, there are three utility links: 'Access the Open Payments User Guide' (with a document icon), 'Need help with the website? Contact Us by email' (with a question mark icon), and 'Review the Open Payments Privacy Policy [PDF, 102 KB]' (with a lock icon). At the bottom right, there is a photograph of a man and a woman in professional attire.

Take note that once the data has been uploaded to the system and undergone these checks, it still must be submitted as final into the Open Payments system. Manual data entry only uploads the record and checks it to ensure that it adheres to a valid data format and matching requirements. **You must complete the final submission and attestation process for the data to be considered reported.** See Section 4.9 for details on final submission and Section 4.13 for details on attestation.

Open Payments User Guide

4.5b: Manual Entry of Research Payments

To enter research payment data manually, follow these steps:

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials, navigate to the Open Payments home page, and select the “Submissions” tab from the landing page.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home | **Submissions** (Submit, Review, Attest) | Review and Dispute (View, Respond, Resolve) | Manage Entities (Register, Edit, Nominate Roles) | My Profile (Account, Roles, Nominations) | Help

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - The program year 2015 data submission period is now open. Reporting entities may begin submitting and attesting to their data.

Reporting entities registered in a prior program year must be re-certified before any system-related actions can be performed. Review and dispute point of contact information must be provided to complete re-certification. For information on how to re-certify, refer to the quick reference guide "Applicable Manufacturer and Applicable GPO Registration and Re-Certification," located on the Resources page of the Open Payments website.

Review and dispute functionality in the Open Payments system is unavailable until April 2016.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

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
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: Select “Manual Data Entry” from the “Submissions” page.

Open Payments (Sunshine Act)
Manufacturers or Group Purchasing Organization Switch User Type

Home **Submissions** (Submit, Review, Attest) **Review and Dispute** (View, Respond, Resolve) **Manage Entities** (Register, Edit, Nominate Roles) **My Profile** (Account, Roles, Nominations) **Help**

Submissions

A field with an asterisk (*) is required.

Applicable manufacturers and applicable group purchasing organizations (GPOs) must submit payments, other transfers of value, and ownership or investment interests to the Open Payments system.

Data Submission

Users who hold the role of submitter can submit information about payments, other transfers of value, and ownership or investment interests to the Open Payments system via bulk file upload or manual data entry.

Bulk file upload allows you to submit multiple records in a single CSV file. Manual data entry allows you to submit records manually using the Open Payments system graphic user interface (GUI) rather than creating a data file.

Select Data Submission Method:

Select your preferred method of data submission below:

[Bulk File Upload](#)
[Manual Data Entry](#)

Review Submitted Records

Once data has been submitted, any active user associated with that entity can review all records submitted for that entity. To review records, select the name of the entity whose records you wish to review and the program year for the records from the dropdown lists below, then select "Review Records."

*Select Entity: *Select Program Year: [Review Records](#)

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Download Physician List

The Validated Physician List below should not be shared publicly.

[Validated Physician List](#)

Download the Reporting Templates

The most recent versions of the reporting template files are below.

CSV Templates

- [Open Payments Research Template.csv](#)
- [Open Payments General Template.csv](#)
- [Open Payments Owner/Investor Template.csv](#)

Download All Templates

[Open Payments Templates](#)

Open Payments User Guide

Step 3: On the “Enter Records Manually” page, use the drop-down menus to select the Payment Category, Entity Name, and Program Year. You may enter the Home System Payment ID (if applicable) of the record you will submit. The Home System Payment ID is the identifier associated with the payment transaction in your home system. Select “Continue” to proceed.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home **Submissions** (Submit, Review, Attest) **Review and Dispute** (View, Respond, Resolve) **Manage Entities** (Register, Edit, Nominate Roles) **My Profile** (Account, Roles, Nominations) **Help**

Enter Records Manually

A field with an asterisk (*) is required.

To enter a payment, transfer of value, or ownership or investment interest enter the following information below:

- Payment Category - select the appropriate payment category
- Entity - select the Applicable Manufacturer or Applicable GPO which made the payment
- Program Year - select the program year that the payment, transfer of value, or ownership or investment interest was made
- Home System Payment ID - optionally enter an internal identifier that corresponds to your system

*Payment Category: Research Payments

*Entity: ABCDEF Medical

*Program Year: 2015

Home System Payment ID:

Cancel **Continue**

[Access the Open Payments User Guide](#)

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

[Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)

Open Payments User Guide

Step 4: Select the recipient type: covered recipient physician, covered recipient teaching hospital, non-covered recipient entity, or non-covered recipient individual.

Step 4a: For covered recipient teaching hospitals, enter information as requested on the page below. Required fields are marked with asterisks. Select the “Continue” button to proceed.

On the “Covered Recipient Demographic Information” page, users can access the teaching hospital list for the applicable program year via the link provided to the CMS Open Payments website. This list, vetted and compiled by CMS, contains identifying information for teaching hospitals and is updated annually. Refer to the list to ensure you have complete and accurate identifying information for a teaching hospital for a given program year. You can also view the teaching hospital list on the Resources page of the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>.

The name entered in the “Teaching Hospital Name” field should match the name listed in the “Hospital Name” field of the teaching hospital list (also known as the “Doing Business As” (DBA) name), unless the record is for program year 2013, in which case the hospital’s legal name from the 2013 teaching hospital list should be used. The address should be the “NPPES Business Address.”

The screenshot shows the 'Open Payments (Sunshine Act)' website interface. The main heading is 'Recipient Demographic Information'. Below the heading, there is a note: 'A field with an asterisk (*) is required.' The form contains several fields: 'Recipient Type' (a dropdown menu with 'Covered Recipient Teaching Hospital' selected, indicated by a red arrow), 'Covered Recipient Teaching Hospital Name' (text input), 'Covered Recipient Teaching Hospital Taxpayer ID Number (TIN)' (text input with a note 'This is a 9-digit number'), 'Recipient Country' (dropdown menu with 'United States' selected), 'Recipient Business Street Address, Line 1' (text input), 'Recipient Business Street Address, Line 2' (text input), 'Recipient City' (text input), 'Recipient State' (dropdown menu with 'Maryland' selected), 'Recipient Zip Code' (text input), and 'Recipient Email Address' (text input). At the bottom right, there are 'Back' and 'Continue' buttons.

Open Payments User Guide

Step 4b: For covered recipient physicians, enter information as requested on the page below. Required fields are marked with asterisks. For a list of the available physician taxonomy codes, refer to the Medicare Provider/Supplier to the [Healthcare Provider Taxonomy list in Appendix C](#). Select the “Continue” button to proceed.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

Home Submissions Submit, Review, Abort Review and Dispute View, Respond, Resolve Manage Entities Register, Edit, Nominate, Roles My Profile Account, Roles, Nominations Help

Enter Payments Manually

- 1 Recipient Demographic Information
- 2 Associated Drug, Device, Biological, or Medical Supply Information
- 3 Transfer of Value (Payment) Information
- 4 Review and Submit

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy (PDF, 102 KB)

Recipient Demographic Information

A field with an asterisk (*) is required.

Select the recipient type for the payment, transfer of value, or ownership or investment interest being made. Once the recipient type selection is made, enter the demographic information below.

Note: Once a record has undergone final submission, the covered recipient identifying information in that record (e.g., physician first name and last name, NPI, license information) is locked and cannot be edited. To change covered recipient identifying information in a record that has undergone final submission, you must delete the original record and submit a new record with updated covered recipient identifying information.

To assist with filling out this page, CMS has provided a Teaching Hospital List and a Validated Physician List. You can use them to find correct information when preparing your payment data.

- The Teaching Hospital List is on the CMS Open Payments website. The list is updated annually and can be searched by program year. If a teaching hospital you want to file as a covered recipient does not appear on the Teaching Hospital List, contact the Open Payments Help Desk (openpayments@cms.hhs.gov) for assistance.
- The Teaching Hospital Lists for all program years are available on the CMS Open Payments website at www.cms.gov/openpayments.
- If a payment or other transfer of value was made to a teaching hospital that does not appear on the Teaching Hospital List for the year in which the payment was made, the payment or other transfer of value does not have to be reported.
- For program year 2013, submitted records must use the Legal Business Name (referred as “PECO’s Legal Business Name” in the Teaching Hospital List) of that hospital in the Teaching Hospital Name field. For all subsequent program years, submitted records must use the Doing Business As Name (referred as “Hospital Name” in the Teaching Hospital List) in the Teaching Hospital Name field.
- The Validated Physician List can be found on the Submissions page of the Open Payments system. This list contains first and last names (with variations), NPIs, and state license numbers for physicians who have been reported upon in the Open Payments system. CMS encourages applicable manufacturers and GPOs to use the list to avoid inconsistencies in reporting. This list should not be shared publicly.

***Recipient Type:**
Covered Recipient Physician

***Covered Recipient Physician First Name:** Karam
Covered Recipient Physician Middle Name:

***Covered Recipient Physician Last Name:** Miller
Covered Recipient Physician Name Suffix:

***Recipient Country:**
United States

***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 Email Address:

***Covered Recipient Physician Primary Type:**
Medical Doctor

Covered Recipient Physician NPI:
This is a 10-digit number:
1234567890

To obtain the taxonomy code for the Physician, refer to the Medicare Provider/Supplier to Healthcare Provider Taxonomy list. This list, accessed through the Open Payments User Guide contains all of the taxonomy codes that can be entered into the system. Taxonomy codes not on the list cannot be entered into the system. If you cannot find an exact match from the list, choose the taxonomy code that best identifies the Physician as a health care provider.

***Covered Recipient Physician Taxonomy Code:**
20850000X

To enter your license information, select the state and license number in the fields below. Select “Add” when finished. Enter each state and license number separately until all licenses have been added. You must add at least 1 license number and may add up to 5. You may edit or delete any previously entered license information by selecting the “Edit” or “Delete” buttons.

License State	License Number	Actions
Maryland	323497890	Edit

Add

Cancel Back Continue

Open Payments User Guide

Step 4c: For *non-covered recipient entities*, enter information as requested on the page below. Required fields are marked with asterisks. Select the “Continue” button to proceed.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

Home	Submissions Submit, Review, Attest	Review and Dispute View, Respond, Resolve	Manage Entities Register, Edit, Nominate Roles	My Profile Account, Roles, Nominations	Help
-------------	----------------------------------------------	-----------------------------------------------------	----------------------------------------------------------	--------------------------------------------------	-------------

Enter Payments Manually

- 1 Recipient Demographic Information
- 2 Associated Drug, Device, Biological, or Medical Supply Information
- 3 Transfer of Value (Payment) Information
- 4 Review and Submit

Access the Open Payments User Guide

Need help with the website? **Contact Us** by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Recipient Demographic Information

A field with an asterisk (*) is required.

Select the recipient type for the payment, transfer of value, or ownership or investment interest being made. Once the recipient type selection is made, enter the demographic information below.

Note: Once a record has undergone final submission, the covered recipient identifying information in that record (e.g., physician first name and last name, NPI, license information) is locked and cannot be edited. To change covered recipient identifying information in a record that has undergone final submission, you must delete the original record and submit a new record with updated covered recipient identifying information.

To assist with filling out this page, CMS has provided a Teaching Hospital List and a Validated Physician List. You can use them to find correct information when preparing your payment data.

- The Teaching Hospital List is on the [CMS Open Payments website](#). The list is updated annually and can be searched by program year. If a teaching hospital you want to cite as a covered recipient does not appear on the Teaching Hospital List, contact the Open Payments Help Desk openpayments@cms.hhs.gov for assistance.
- The Teaching Hospital Lists for all program years are available on the CMS Open Payments website at www.cms.gov/openpayments.
- If a payment or other transfer of value was made to a teaching hospital that does not appear on the Teaching Hospital List for the year in which the payment was made, the payment or other transfer of value does not have to be reported.
- For program year 2013, submitted records must use the Legal Business Name (listed as "PECOS Legal Business Name" in the Teaching Hospital List) of that hospital in the Teaching Hospital Name field. For all subsequent program years, submitted records must use the Doing Business As Name (listed as "Hospital Name" in the Teaching Hospital List) in the Teaching Hospital Name field.
- The Validated Physician List can be found on the Submissions page of the Open Payments system. This list contains first and last names (with variations), NPIs, and state license numbers for physicians who have been reported upon in the Open Payments system. CMS encourages applicable manufacturers and GPOs to use the list to avoid inconsistencies in reporting. This list should not be shared publicly.

*Recipient Type:
Non-covered Recipient Entity

*Non-Covered Recipient Entity Name:
WXYZ Corp

*Recipient Country:
United States

*Recipient Business Street Address, Line 1:
7500 Security Blvd

Recipient Business Street Address, Line 2:

*Recipient City:
Baltimore

*Recipient State:
Maryland

*Recipient Zip Code:
99999 9999
21244

Recipient Email Address:

Cancel Back Continue

Open Payments User Guide

Step 4d: For *non-covered recipient individuals*, make the appropriate selection from the drop-down on the “Recipient Demographic Information” page and select “Continue.”

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home | Submissions (Submit, Review, Attest) | Review and Dispute (View, Respond, Resolve) | Manage Entities (Register, Edit, Nominate Roles) | My Profile (Account, Roles, Nominations) | Help

Enter Payments Manually

- 1 Recipient Demographic Information
- 2 Associated Drug, Device, Biological, or Medical Supply Information
- 3 Transfer of Value (Payment) Information
- 4 Review and Submit

Access the Open Payments User Guide | Need help with the website? Contact Us by email | Review the Open Payments Privacy Policy [PDF, 102 KB]

Recipient Demographic Information

A field with an asterisk (*) is required.

Select the recipient type for the payment, transfer of value, or ownership or investment interest being made. Once the recipient type selection is made, enter the demographic information below.

Note: Once a record has undergone final submission, the covered recipient identifying information in that record (e.g., physician first name and last name, NPI, license information) is locked and cannot be edited. To change covered recipient identifying information in a record that has undergone final submission, you must delete the original record and submit a new record with updated covered recipient identifying information.

To assist with filling out this page, CMS has provided a Teaching Hospital List and a Validated Physician List. You can use them to find correct information when preparing your payment data.

- The Teaching Hospital List is on the CMS Open Payments website. The list is updated annually and can be searched by program year. If a teaching hospital you want to cite as a covered recipient does not appear on the Teaching Hospital List, contact the Open Payments Help Desk openpayments@cms.hhs.gov for assistance.
- The Teaching Hospital Lists for all program years are available on the CMS Open Payments website at www.cms.gov/openpayments.
- If a payment or other transfer of value was made to a teaching hospital that does not appear on the Teaching Hospital List for the year in which the payment was made, the payment or other transfer of value does not have to be reported.
- For program year 2013, submitted records must use the Legal Business Name (listed as "PECOS Legal Business Name" in the Teaching Hospital List) of that hospital in the Teaching Hospital Name field. For all subsequent program years, submitted records must use the Doing Business As Name (listed as "Hospital Name" in the Teaching Hospital List) in the Teaching Hospital Name field.
- The Validated Physician List can be found on the Submissions page of the Open Payments system. This list contains first and last names (with variations), NPIs, and state license numbers for physicians who have been reported upon in the Open Payments system. CMS encourages applicable manufacturers and GPOs to use the list to avoid inconsistencies in reporting. This list should not be shared publicly.

***Recipient Type:**
Non-covered Recipient Individual

Cancel | Back | Continue

Step 5: Enter product information. Select the appropriate value in the “Product Indicator” field: covered, non-covered, none, or combination. “Covered” is to be used when reporting only payments or other transfers of value related to covered drugs, biologicals, devices, or medical supplies. “Non-covered” is to be used when reporting payments or other transfers of value related to only non-covered drugs, biologicals, devices, or medical supplies. “None” is to be used when the reported payment was not made in relation to a drug, biological, device, or medical supply. “Combination” is to be used when reporting payments or other transfers of value related to a combination of both covered and non-covered drugs, biologicals, devices, or medical supplies.

Enter National Drug Codes (NDCs) for up to five covered drugs or biologicals to be included in this record. NDCs are unique identifiers with 12 characters and must be in one of the following formats:

- 9999-9999-99
- 99999-999-99
- 99999-9999-9

Open Payments User Guide

NDCs entered that do not match one of these three formats will not be accepted. NDCs can be found on the [U.S. Food and Drug Administration's website at http://www.accessdata.fda.gov/scripts/cder/ndc/default.cfm](http://www.accessdata.fda.gov/scripts/cder/ndc/default.cfm).

Enter the names of the drugs or biologicals associated with those NDCs in the table on the bottom left of the page. If you are submitting information for covered devices or medical supplies, provide their names in the fields on the bottom right of the page. Note: for every NDC entered, you **must** provide a corresponding "Name of Associated Covered Drug or Biological." If more than one NDC is provided, their order must match the order of the named covered drug or biological. For example, if an NDC code is entered in the first "NDC of Associated Covered Drug or Biological" field, the drug name must be entered in the first "Name of Associated Covered Drug or Device" field.

Once all information is entered, select "Continue."

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home Submissions Review and Dispute Manage Entities My Profile Help
View, Respond, Resolve Register, Edit, Nominate Roles Account, Roles, Nominations

Enter Payments Manually

✓ Recipient Demographic Information

② **Associated Drug, Device, Biological, or Medical Supply Information**

③ Transfer of Value (Payment) Information

④ Review and Submit

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Associated Drug, Device, Biological, or Medical Supply Information

A field with an asterisk (*) is required.

Select the product indicator from the drop-down menu and then enter the applicable information for the associated covered drugs, devices, biologicals, or medical supplies. If you select "Covered" or "Combination" from the drop-down menu, you must enter the name of an associated covered drug or biological, or the name of the associated covered device or medical supply. If you are entering multiple drugs, biologicals, devices, or medical supplies, do not skip fields between each entry, including the first field (e.g., if you have two items, they must be entered in the first and second fields). If the National Drug Code (NDC) of the associated covered drug or biological is available, you are required to enter it. Note that if you enter an NDC, you are also required to enter the corresponding Name of Associated Covered Drug or Biological field. When done, select the "Continue" button.

*Product indicator: Covered

*Required: Enter the name of the associated covered drug or biological, or name of the associated covered device or medical supply.

Name of Associated Covered Drug or Biological:	National Drug Code (NDC) of Associated Covered Drug or Biological: 9999-9999-99 OR 99999-999-99 OR 99999-9999-9
1. Test Drug	1. 9999-9999-99
2.	2.
3.	3.
4.	4.
5.	5.

Name of Associated Covered Device or Medical Supply:

1.

2.

3.

4.

5.

Cancel Back Continue

Open Payments User Guide

Step 6: Enter payment information in the required fields: total amount of payment, date of payment, the number of payments included in the total amount, the form of payment or other transfer of value, and the nature of payment or other transfer of value. Note that only positive dollar values are allowed when reporting payment amounts. Negative dollar values or zeros are not permitted.

If you wish to request a delay in public reporting of that payment, you can request a delay in the “Delay in Publication of Research Payment Indicator” drop-down menu near the bottom of the page. See Section 4.10 for information on delays in publication. If the “Delay in Publication of Research Payment” field is set to request a delay in publication, the “Contextual Information” text box must include the name of the relevant research study. All special characters found on a standard U.S. keyboard can be used in the “Contextual Information” text box, not including ALT+NUMPAD ASCII Key characters.

If the record has one or more principal investigators associated with it, select “Yes” from the “Principal Investigator Covered Recipient Physician Indicator” drop-down box. The screen will expand to provide fields for entering identifying information for one principal investigator. Provide the required information for one covered recipient, then select “Add Principal Investigator” to add that individual to the record. Add up to five principal investigator covered recipients.

Note that a principal investigator’s identifying information cannot be the same as the covered recipient physician’s identifying information (i.e., the physician and principal investigator in a record cannot be the same individual).

The rules for principal investigator input varies based upon the type of recipient on the record (covered recipient physician, covered recipient teaching hospital, non-covered entity, or non-covered individual):

- If the recipient type is “Covered Recipient Physician” and the “Principal Investigator Covered Recipient Physician Indicator” is set to “Yes,” then enter at least one covered Principal Investigator. The covered recipient physician should not also be listed as a principal investigator, nor should Principal Investigator information be repeated on a record.
- If the recipient type is “Covered Recipient Teaching Hospital” and the “Principal Investigator Covered Recipient Physician Indicator” is set to “Yes,” then at least one covered recipient Principal Investigator is required to be entered.
- If the recipient type is “Non-Covered Entity” or “Non-Covered Individual,” the “Principal Investigator Covered Recipient Physician Indicator” must be set to “Yes” and at least one covered recipient Principal Investigator must be entered.

Once all information is entered, select “Continue to Review.”

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

Home | **Submissions** (Submit, Review, Attest) | **Review and Dispute** (View, Respond, Resolve) | **Manage Entities** (Register, Edit, Nominate, Roles) | **My Profile** (Account, Roles, Nominations) | **Help**

Enter Payments Manually

- ✓ Recipient Demographic Information
- ✓ Associated Drug, Device, Biological, or Medical Supply Information
- 3 Transfer of Value (Payment) Information**
- 4 Review and Submit

Access the Open Payments User Guide

Need help with the website? **Contact Us** by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Research Payment or Other Transfer of Value Information

A field with an asterisk (*) is required.
Enter the required payment or transfer of value information. When done, select the "Continue" button.

Applicable Manufacturer or Applicable GPO Making Payment Name: ABCDEF Medical

Applicable Manufacturer or Applicable GPO Making Payment Registration ID: 10000345011

***Total Amount of Research Payment:** 99999.99 and maximum 12 digits
3000

***Date of Payment:** yyyyymmdd
20150911

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

Expenditure Category: Enter the percent for each of the following expenditure categories

Professional Salary Support	Medical Research Writing or Publication
<input type="text"/>	<input type="text"/>
Patient Care	Non-patient Care
<input type="text"/>	<input type="text"/>
Overhead	Other
<input type="text"/>	<input type="text"/>

***Pre-clinical Research Indicator:** No

***Delay in Publication of Research Payment Indicator:** No Delay Requested

***Name of Study:** Trial 1

Context of Research:

ClinicalTrials.gov Identifier:
Maximum 11 characters, first 3 must be letters

Research Information Link:
http://www. or https://www. or www

***Principal Investigator Covered Recipient Physician Indicator:** No

Open Payments User Guide

Step 7: Review the payment information entered in the previous pages. Select the “Back” button at the bottom of the page to go back and edit information if necessary. If the information is correct, select “Save Record” to continue.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Select User Type

Home Submissions (Submit, Review, Abort) Review and Dispute (View, Respond, Resolve) Manage Entities (Register, Edit, Nominate, Roles) My Profile (Account, Roles, Nominations) Help

Enter Payments Manually

- Recipient Demographic Information
- Associated Drug, Device, Biological, or Medical Supply Information
- Transfer of Value (Payments)

Information

- Review and Submit
- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy (PDF) (1/2/10)

Review and Save Page

Review the information for the payment or transfer of value. When done, select the “Save Record” button.

Payment Submission Information

Payment Category: Research Payments
Entity: ABCDEF Medical
Program Year: 2015
Home System Payment ID:

Recipient Demographic Information

Recipient Type: Covered Recipient Teaching Hospital
Covered Recipient Teaching Hospital Name: ABCDE Teaching Hospital
Covered Recipient Teaching Hospital Taxpayer ID Number (TIN): 123456789
Recipient Business Street Address, Line 1: 1500 Security Blvd
Recipient Business Street Address, Line 2:
Recipient City: Baltimore
Recipient State: Maryland Recipient Zip Code: 21244
Recipient Country: United States
Recipient Email Address:

Associated Drug, Device, Biological, or Medical Supply Information

Product Indicator: Covered
Name of Associated Covered Drug or Biological: 1 Test Drug
National Drug Code (NDC) of Associated Covered Drug or Biological: 15999-9999-99
Name of Associated Covered Device or Medical Supply:

Research Payment or Other Transfer of Value Information

Applicable Manufacturer or Applicable GPO Making Payment Name: ABCDEF Medical
Applicable Manufacturer or Applicable GPO Making Payment Registration ID: 10000034011
Total Amount of Research Payment: \$3,000.00
Date of Payment: 20150111 Form of Payment or Transfer of Value: Cash or cash equivalent
Expenditure Category:
Professional Salary Support Medical Research Writing or Publication
Patient Care Non-patient Care
Overhead Other:
Pre-clinical Research Indicator: N Delay in Publication of Research Payment Indication: No Delay Requested
Name of Study: Trial 1
Context of Research:
ClinicalTrials.gov Identifier:
Research Information Link
Principal Investigator Covered Recipient Physician Indicator: Y

Principal Investigator(s) Information

Principal Investigator First Name: Mary
Principal Investigator Middle Name:
Principal Investigator Last Name: Dawn
Principal Investigator Suffix:
Principal Investigator Business Street Address, Line 1: 7500 Security Blvd
Principal Investigator Business Street Address, Line 2:
Principal Investigator Business City: Baltimore
Principal Investigator State: Maryland Principal Investigator Zip Code: 21244
Principal Investigator Country: United States Principal Investigator Province:
Principal Investigator Postal Code:
Principal Investigator Physician Primary Type: Medical Director Principal Investigator NPI: 1234567890
Principal Investigator Taxonomy Code: 20800000X
Principal Investigator License State: Maryland Principal Investigator License Number: 1234567890

Cancel Back Save Record

Open Payments User Guide

A confirmation message will be displayed on-screen to confirm that the record of the payment or other transfers of value has been saved and is being processed.

The screenshot displays the 'Open Payments (Sunshine Act)' web application interface. At the top, there is a navigation menu with tabs for Home, Submissions (with sub-links for Submit, Review, and Attest), Review and Dispute (with sub-links for View, Respond, and Resolve), Manage Entities (with sub-links for Register, Edit, Nominate, and Roles), My Profile (with sub-links for Account, Roles, and Nominations), and Help. Below the navigation menu, a large heading reads 'Record Saved Successfully'. The main content area contains a confirmation message: 'You have successfully saved a record for 2015, Research Payments - ABCDEF Medical. To view your record detail select "Go to Review Records" button. To add a new record, select "Add Another Record" button.' Below this message are two yellow buttons: 'Add Another Record' and 'Go to Review Records'. A note below the buttons states: 'Note: Entering a payment or transfer of value and saving the record is not considered a "final submission". The final submission of an entity's payments or transfers of value must be attested by the entity's attester.' To the right of the main content area, there are three utility links: 'Access the Open Payments User Guide' (with a document icon), 'Need help with the website? Contact Us by email' (with a question mark icon), and 'Review the Open Payments Privacy Policy [PDF, 102 KB]' (with a lock icon). At the bottom right of the interface, there is a photograph of a man and a woman in business attire talking.

Take note that once the data has been uploaded to the system and undergone these checks, it still must be submitted as final into the Open Payments system. Manual data entry only uploads the record and checks it to ensure that it adheres to a valid data format and matching requirements. **You must complete the final submission and attestation process for the data to be considered reported.** See Section 4.9 for details on final submission and Section 4.13 for details on attestation.

Open Payments User Guide

4.5c: Manual Entry of Ownership/Investment Interests Payments

To enter ownership/investment interests payments manually, follow these steps:

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials, navigate to the Open Payments home page, and select the “Submissions” tab from the landing page.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home | **Submissions** (Submit, Review, Attest) | Review and Dispute (View, Respond, Resolve) | Manage Entities (Register, Edit, Nominate Roles) | My Profile (Account, Roles, Nominations) | Help

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - The program year 2015 data submission period is now open. Reporting entities may begin submitting and attesting to their data.

Reporting entities registered in a prior program year must be re-certified before any system-related actions can be performed. Review and dispute point of contact information must be provided to complete re-certification. For information on how to re-certify, refer to the quick reference guide "Applicable Manufacturer and Applicable GPO Registration and Re-Certification," located on the Resources page of the Open Payments website.

Review and dispute functionality in the Open Payments system is unavailable until April 2016.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

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

Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: Select “Manual Data Entry” from the “Submissions” page.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home Submissions Review and Dispute Manage Entities My Profile Help
Submit, Review, Attest View, Respond, Resolve Register, Edit, Nominate, Roles Account, Roles, Nominations

Submissions

A field with an asterisk (*) is required

Applicable manufacturers and applicable group purchasing organizations (GPOs) must submit payments, other transfers of value, and ownership or investment interests to the Open Payments system.

Data Submission

Users who hold the role of submitter can submit information about payments, other transfers of value, and ownership or investment interests to the Open Payments system via bulk file upload or manual data entry.

Bulk file upload allows you to submit multiple records in a single CSV file. Manual data entry allows you to submit records manually using the Open Payments system graphic user interface (GUI) rather than creating a data file.

Select Data Submission Method:
Select your preferred method of data submission below.

Bulk File Upload
Manual Data Entry

Review Submitted Records

Once data has been submitted, any active user associated with that entity can review all records submitted for that entity. To review records, select the name of the entity whose records you wish to review and the program year for the records from the dropdown lists below, then select "Review Records."

Select Entity: Please Select Select Program Year: Please Select Review Records

Access the Open Payments User Guide
Need help with the website? Contact Us by email
Review the Open Payments Privacy Policy [PDF, 102 KB]
Download Physician List
Download the Reporting Templates
CSV Templates
Open Payments Research Template.csv
Open Payments General Template.csv
Open Payments Owner/Investor Template.csv
Download All Templates
Open Payments Templates

Step 3: On the “Enter Records Manually” page, use the drop-down menus to select the Payment Category, Entity Name, and Program Year. You may enter the Home System Payment ID (if applicable) of the record you will submit. The Home System Payment ID is the identifier associated with the payment transaction in your home system. Select “Continue” to proceed.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home Submissions Review and Dispute Manage Entities My Profile Help
Submit, Review, Attest View, Respond, Resolve Register, Edit, Nominate, Roles Account, Roles, Nominations

Enter Records Manually

A field with an asterisk (*) is required

To enter a payment, transfer of value, or ownership or investment interest enter the following information below:

- Payment Category - select the appropriate payment category
- Entity - select the Applicable Manufacturer or Applicable GPO which made the payment
- Program Year - select the program year that the payment, transfer of value, or ownership or investment interest was made
- Home System Payment ID - optionally enter an internal identifier that corresponds to your system

Payment Category: Ownership or Investment Interest
Entity: ABCDEF Medical
Program Year: 2015
Home System Payment ID:

Cancel Continue

Access the Open Payments User Guide
Need help with the website? Contact Us by email
Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 4: Enter the Physician Demographic Information seen on the page below. Required fields are marked with asterisks. Consult the Validated Physician List, downloadable from the “Submissions” page, to confirm the identifying information for the physician. For a list of the available physician taxonomy codes, refer to the Medicare Provider/Supplier to the [Healthcare Provider Taxonomy list in Appendix C](#).

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

Home | Submissions (Submit, Review, Attach) | Review and Dispute (View, Respond, Resolve) | Manage Entities (Register, Edit, Nominate, Roles) | My Profile (Account, Roles, Nominations) | Help

Enter Payments Manually

- 1 Physician Demographic Information
- 2 Ownership/Investment Information
- 3 Review and Submit

[Access the Open Payments User Guide](#)

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

[Review the Open Payments Privacy Policy \(PDF, 102 KB\)](#)

Physician Demographic Information

A field with an asterisk (*) is required.

Enter the demographic information for the physician receiving the payment, transfer of value, or holding the ownership or investment interest. When done, select "Continue."

To assist with filling out this page, CMS has provided a Validated Physician List. You can use it to find correct information when preparing your payment data.

- The Validated Physician List can be found on the Submissions page of the Open Payments system. This list contains first and last names (with variations), NPIs, and state license numbers for physicians who have been reported upon in the Open Payments system. CMS encourages applicable manufacturers and GPOs to use the list to avoid inconsistencies in reporting. This list should not be shared publicly.

*Physician's First Name: Tom

Physician Middle Name:

*Physician Last Name: Smith

Physician Name Suffix:

*Physician Country: United States

*Physician Business Street Address, Line 1: 7500 Security Blvd

Physician Business Street Address, Line 2:

*Physician City: Baltimore

*Physician State: Maryland

*Physician Zip Code: 09999 9990
21244

Physician Email Address:

*Physician Primary Type: Medical Doctor

Physician NPI: This is a 10-digit number
1234567890

To obtain the taxonomy code for the Physician, refer to the Medicare Provider/Supplier to Healthcare Provider Taxonomy list. This list, accessed through the Open Payments User Guide contains all of the taxonomy codes that can be entered into the system. Taxonomy codes not on the list cannot be entered into the system. If you cannot find an exact match from the list, choose the taxonomy code that best identifies the Physician as a health care provider.

*Physician Taxonomy Code: 208D00000X

To enter your license information, select the state and license number in the fields below. Select "Add" when finished. Enter each state and license number separately until all licenses have been added. You must add at least 1 license number and may add up to 5. You may edit or delete any previously entered license information by selecting the "Edit" or "Delete" buttons.

License State:	License Number:	Actions:
Maryland	1234567890	Edit

Add

Cancel Back Continue

Open Payments User Guide

Step 5: Enter the ownership or investment interests information. Required fields are marked with asterisks.

Note that the total sum of the payment must exceed zero dollars. Correspondingly, either the “Dollar Amount Invested” or “Value of Interest “ fields must have an amount greater than 0.00. The “Terms of Interest” field must contain a description of any applicable terms of the ownership or investment interests. When reporting the terms of any ownership or investment interests, provide the type of ownership or investment interests, including but not limited to stock, stock options, partnership shares, loans, bonds, or other financial instruments that are secured with an entity’s property or revenue, or a portion of that property or revenue. The field is a free-form text field, with a 500-character maximum. All special characters found on a standard U.S. keyboard can be used in the text box, not including ALT+NUMPAD ASCII Key characters. Once all information is entered, select “Continue to Review.”

The screenshot displays the 'Open Payments (Sunshine Act)' web application interface. At the top, there is a navigation menu with tabs for Home, Submissions (with sub-links for Submit, Review, Attest), Review and Dispute (with sub-links for View, Respond, Resolve), Manage Entities (with sub-links for Register, Edit, Nominate, Roles), My Profile (with sub-links for Account, Roles, Nominations), and Help. Below the navigation is a sidebar titled 'Enter Payments Manually' with steps: Physician Demographic Information, Ownership/Investment Information (highlighted), Review and Submit, and a 'Review' button. The main content area is titled 'Ownership or Investment Information' and includes a note: 'A field with an asterisk (*) is required.' Below this, there is a text input field for 'Applicable Manufacturer or Applicable GPO Reporting Ownership Name' with the value 'ABCDEF Medical'. Another text input field is for 'Applicable Manufacturer or Applicable GPO Reporting Ownership Registration ID' with the value '10000345011'. There are two required fields: '*Interest Held By:' with a dropdown menu showing 'Physician Covered Recipient' and '*Dollar Amount Invested:' with a text input field containing '1000'. Below these are '*Value of Interest:' with a text input field containing '1000' and '*Terms of Interest:' with a large text area containing the placeholder 'Enter terms of interest.'. At the bottom of the form are three buttons: 'Cancel', 'Back', and 'Continue to Review' (which is highlighted with a red circle).

Open Payments User Guide

Step 6: Review the ownership or investment interests information entered in the previous pages. Select the “Back” button at the bottom of the page to go back and edit information if necessary. If the information is correct, select “Save Record” to continue.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization [Switch User Type](#)

- Home
- Submissions**
Submit, Review, Attest
- Review and Dispute
View, Respond, Resolve
- Manage Entities
Register, Edit, Nominate Roles
- My Profile
Account, Roles, Nominations
- Help

Enter Payments Manually

- ✓ Physician Demographic Information
- ✓ Ownership/Investment Information
- 3 Review and Submit**
- ➔ Access the Open Payments User Guide
- ? Need help with the website? **Contact Us** by email
- 🔒 Review the Open Payments Privacy Policy [PDF, 102 KB]

Review and Save Page

Review the information for the payment or transfer of value. When done, select the "Save Record" button.

Payment Submission Information

Payment Category: Ownership or Investment Interest

Entity: ABCDEF Medical

Program Year: 2015

Home System Payment ID:

Physician Demographic Information

Physician's First Name: Tom Physician Middle Name:

Physician Last Name: Smith Physician Name Suffix:

Physician Business Street Address, Line 1: 7500 Security Blvd

Physician Business Street Address, Line 2:

Physician City: Baltimore

Physician State: Maryland Physician Zip Code: 21244 -

Physician Country: United States

Physician Email Address:

Physician Primary Type: Medical Doctor

Physician NPI: 1234567890

Physician Taxonomy Code: 208D00000X

Physician License State: Maryland Physician License Number: 1234567890

Ownership or Investment Information

Applicable Manufacturer or Applicable GPO Reporting Ownership Name: ABCDEF Medical

Applicable Manufacturer or Applicable GPO Reporting Ownership Registration ID: 10000345011

Interest Held By: Physician Covered Dollar Amount Invested: \$1,000.00
Recipient

Terms of Interest: Enter terms of interest.

Value of Interest: \$1,000.00

Open Payments User Guide

A confirmation message will be displayed on-screen to confirm the payment has been saved and is being processed.



Take note that once the data has been uploaded to the system and undergone these checks, it still must be submitted as final into the Open Payments system. Manual data entry only uploads the record and checks it to ensure that it adheres to a valid data format and matching requirements. **You must complete the final submission and attestation process for the data to be considered reported.** See Section 4.9 for details on final submission and Section 4.13 for details on attestation.

Section 4.6: Record Validation and Matching

Records submitted to the Open Payments system undergo two types of checks prior to completing final submission and attestation. First, all records must be successfully validated before being accepted into the system. This validation matches submitted data against data field requirements to ensure that the required data is provided and in the correct format. These data field requirements are explained in detail in the Submission Data Mapping Document, available on the Resources page of the Open Payments website (<https://www.cms.gov/OpenPayments/About/Resources.html>).

If the data has been successfully validated, it then goes through a matching process to ensure the records reported are consistently attributed to the correct physicians and teaching hospitals. After the matching process is complete, the Open Payments system sends an email to submitters alerting them to the success or failure of their submission and if any validation or matching errors exist.

Section 4.7: Correcting Validation and Matching Errors

Records containing validation or matching errors will be flagged and must be corrected and re-submitted by the reporting entities submitter until the records are free from errors.

4.7a: Types of Errors

Data submitted to the Open Payments system may have three kinds of errors: file format errors, data format errors, and data matching errors.

- **File format errors:** Bulk data files will not be accepted by the Open Payments system if any of the following formatting errors are detected:
 - If the submitted file size is larger than 250 MB;
 - If the file is not in CSV or ZIP format;
 - If the file header row is not present;
 - If columns are missing in the data file; or
 - If the sample file used to create the submitted file and payment category of the file selected at upload do not match
- **Data Format Errors:** A record submitted via bulk file upload will fail if the information in the record does not match the formatting accepted by the system.
 - Invalid characters are included in the data element;
 - A required data element is left blank;
 - Too many or too few characters are in the data element; or
 - There is an invalid value in the data element.
- **Data Matching Errors:** Generated when the covered recipient information in a record (e.g., Physician First Name, Teaching Hospital Address, etc.) cannot be matched to a valid covered recipient using existing CMS resources and information.

4.7b: Error Statuses and Notifications

Submitters will be notified via email if records failed validation or matching. Additional error statuses and notifications will differ based on how the records are submitted.

For records submitted via bulk file upload, records containing errors will be placed in one of two statuses based on the errors found: “Failed Validation” or “Failed Matching Validation.”

- **Failed Validation:** Records that contain data format errors.

Open Payments User Guide

- **Failed Matching Validation:** Records that contain covered recipient matching errors.

Open Payments will generate an error report that provides details on the specific errors, detailing the data field that contains the error and what type of error it is. The system will then send a notification email to users holding a submitter role with the reporting entity explaining how to find the error report. The error report itself is explained in detail later in this section.

For records submitted manually, field or format errors are detected in real time via an on-screen message. Therefore, records successfully uploaded manually will not have validation errors. Nevertheless, manually entered records may fail matching and be placed in “Failed Matching Validation” status. If a record fails matching, the Open Payments system will send an email to the submitter notifying of the matching failure.

To find submitted records with matching errors, you can search the “Payment Category” pages for records in “Failed Matching Validation” status. This will display all records which failed matching validation regardless of how the record was submitted.

Note: If corrections or changes are made to the fields that identify the covered recipient after final submission, including principal investigators, the original record cannot be corrected. It must be deleted and then re-submitted as a new record.

- For physicians (including principal investigators), these identifying fields are First Name, Last Name, NPI, License State, and License Number.
- For teaching hospitals, these identifying fields are Teaching Hospital Name, the hospital address fields, and Taxpayer Identification Number.

4.7c: Finding Errors and Correcting Records

Finding and correcting errors occurs in four steps.

Step 1: Find the Record(s) with Errors

To find which records have errors, 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 on the toolbar.
2. On the “Review Submitted Records” menu on the “Submissions” page, select the entity whose records you wish to review and the program year for those records, then select “Review Records.”
3. On the “Review Records” page, find the payment category (general, research, or ownership/investment) of the record you wish to correct and select the button labeled “View All.”

Open Payments User Guide

4. All records submitted for the reporting entity for that payment category will appear in the search regardless of the method they were submitted. Using the search capabilities in the Record Status table, search for records in a “Failed Validation” or “Failed Matching Validation” record status.
 - You can download the record information returned by your search to a zipped CSV file by selecting the “Download” link on the “Payment Category” page. The download file will contain all of the columns of data displayed on the “Payment Category” page, and the filters applied on the page will be applied to the download. When the “Download” link is selected, a pop-up message will be displayed to the user confirming whether they would like to proceed with the download or not. If the downloaded file contains fewer than the acceptable download limit of records (approximately 400,000 records), the system will notify the user that the download request is in progress. If the records returned exceed the acceptable record download limit, an empty CSV file will be generated containing an error message requesting you modify your filters to create smaller subsets of records and download them in multiple files.

Open Payments User Guide

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization System User Type

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

ABCDE Medical 2015 - General Payments

The table below provides details of submitted records for the selected entity, program year, and payment category, as well as the status and required actions for these records. No records will be shown if the entity has not submitted any data under this payment category.

You may customize your view of the records by using the search and filtering tools above the data table.

For more information on the actions you can take on this page, refer to the [Quick Reference Guide for the Payments Category Page](#). For detailed information on how to edit and submit records, refer to the [Open Payments User Guide](#).

You may export your search results into a CSV file by selecting the link labeled "Download". The file will be compressed into a ZIP file. It will contain all data fields displayed in the table shown below. If you attempt to download a file that exceeds the system limit (approximately 400,000 records), you will receive an on-screen error notification. To correct this error, adjust the filtering criteria to create smaller subsets of records and download them in multiple files. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

information on how to edit and submit records, refer to the [Open Payments User Guide](#).

You may export your search results into a CSV file by selecting the link labeled "Download". The file will be compressed into a ZIP file. It will contain all data fields displayed in the table shown below. If you attempt to download a file that exceeds the system limit (approximately 400,000 records), you will receive an on-screen error notification. To correct this error, adjust the filtering criteria to create smaller subsets of records and download them in multiple files. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

Records counted as "Marked for Deletion" are also included in the "Attested" (†) record count. If you wish to reinstate records marked for deletion, find the records with the "Marked for Deletion" status of "Yes", select the checkbox next to them, and then select the "Cancel Deletion" button.

General Payments

[Refresh Status](#)

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	1	Correction
Return to Submitter	0	Correction
Attested †	6	No Action
Failed Matching Validation	0	Correction
Total Payments	7	

Note: Previously attested records that have been marked for deletion have not yet been deleted from the Open Payments system. The attester must re-attest to all payments for the selected program year to complete deletion. Until this re-attestation, the marked records remain eligible for review and dispute, are eligible for publication, and are included in the attested record count.

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion	0	Attester to Attest or Reject Deletion

[Back to Review Records](#)

Record Status: Please Select
 Attested
 Ready for Submission
 System Processing
 Failed Validation
 Matching in Progress
 Ready for Attestation
 Failed Match Validation

File ID: Maximum 38 digits

Delay in Publication Indicator: Please Select

Record ID: Maximum 38 digits

Home System Payment ID:

Marked for Deletion: Yes No
Recipient Type: Covered Recipient Physician Covered Recipient Teaching Hospital
Input Method: Manual Entry Upload Files
Report Type: Single Consolidated

[Search](#) [Clear All](#) [Download](#)

Show Entries 10

[Cancel Deletion](#)

[Return to Submitter](#)

Select All	File ID	Record ID	Home System Payment ID	Payment Date	Amount (\$)	Recipient Type	Recipient	Last Modified By	Last Modified	Record Status	Marked for Deletion
<input type="checkbox"/>	84	1082351		20150415	\$24,000.40	Physician	Mary Davis	Joe Smith	2015-12-10	Failed Validation	No
<input type="checkbox"/>	N/A	44782		20150415	\$302.12	Physician	Mary Davis	Joe Smith	2015-07-27	Attested	No
<input type="checkbox"/>	N/A	44696		20150415	\$392.12	Teaching Hospital	WXYZ Teaching Hospital	Joe Smith	2015-07-27	Attested	No
<input type="checkbox"/>	N/A	44892		20150415	\$202.32	Physician	Mary Davis	Joe Smith	2015-07-27	Attested	No
<input type="checkbox"/>	N/A	619881		20150415	\$9.03	Physician	Mary Davis	Joe Smith	2015-09-30	Attested	No
<input type="checkbox"/>	N/A	743278		20150415	\$150.00	Teaching Hospital	WXYZ Teaching Hospital	Joe Smith	2015-11-23	Attested	No
<input type="checkbox"/>	N/A	619013		20150415	\$999.69	Physician	Mary Davis	Joe Smith	2015-10-05	Attested	No

Page 1 of 1 Showing 7 of 7 Entries Page 1 Go

Open Payments User Guide

Step 2: View Errors in Record(s)

If you submitted records manually, or you wish to view one record at a time, select the hyperlink in the “Record ID” column of a record you wish to view. This will take you to the “Record ID” page. All error messages related to that record will be displayed on the top of the page. See step 3 for more on error codes.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Search User Type

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Record ID: 1106659

You have the following errors on this page:

- Error: Physician First Name does not match the information provided in the CMS Physician List
- Error: Physician Last Name does not match the information provided in the CMS Physician List

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Record Details

Program Year: 2015	Last Modified Date: 2015-10-19
Payment Submitting Entity: ADCOET Medical	Last Modified By: Susan Jones
Payment Category: General Payments	Submission Date: 2015-10-19
Consolidated Reporting: No	Submitted By: Susan Jones
Home System Payment ID:	Record Status: Failed Matching Validation
	Marked for Deletion: No
	Associated Disputes and Denials:

Recipient Demographic Information

Covered Recipient Type: Physician

Physician First Name: Tom

Physician Middle Name:

Physician Last Name: Smith

Physician Name Suffix:

Recipient Business Street Address, Line 1: 7500 Security Blvd

Recipient Business Street Address, Line 2:

Recipient City: Dallas

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: 1111111111

Physician Taxonomy Code: 2000000000

Physician License State: Indiana

Physician License Number: 1111111111

Physician License State:

Physician License Number:

Associated Drug, Device, Biological, or Medical Supply Information

Product Indicator: Covered

National Drug Code (NDC) of Associated Covered Drug or Biological: 1-800-999-9999

Name of Associated Covered Drug or Biological: 1 Test Drug

Name of Associated Covered Device or Medical Supply:

Transfer of Value (Payment) Information

Applicable Manufacturer or Applicable GPO Making Payment Name: ADCOET Medical

Applicable Manufacturer or Applicable GPO Making Payment Registration ID: 10000032011

Total Amount of Payment: \$350.00

Date of Payment: 2015/10/21

Number of Payments Included in Total Amount: 1

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

Method of Payment or Transfer of Value: Food and Beverage

City of Travel:

State of Travel:

Country of Travel:

General Record Information

Physician Ownership Indicator: No

Third Party Payment Recipient Indicator: Is Third Party Payment

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

Clarity Indicator:

Third Party Equals Covered Recipient Indicator:

Delay in Publications of Research Payment Indicator: No Delay Requested

Confidential Information:

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Access the Open Payments User Guide

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Review the Open Payments Privacy Policy (PDF, 132 KB)

Open Payments User Guide

If you submitted this record via bulk file upload, select the hyperlink in the “File ID” column. An Error Log will be generated that displays error codes associated with the submitted file. Select the hyperlink at the bottom of the page to download the Error Log associated with this file. When downloading the Error Log, you will be asked to select a format for viewing it. The screenshot below shows a sample Error Log opened as a CSV file. You may also open a report using Notepad or another application.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization [Switch User Type](#)

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Roles
- My Profile**
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- Help

File ID: 94

Details about the File Submitted

Download a copy of the record IDs included the submitted file, mapped to your Home System Payment IDs and any application error codes.

2015 ABCDE Medical

Original Upload File Name:	Gen-7607.csv
Submission Type:	Initial Submission
Original /Resubmission Date:	7/9/2015 4:43 PM
Submitted By:	John Smith
File Size:	4 KB
File Type:	csv
File Status:	Submitted With Errors
Total Payments:	\$24,000.40
Number of Records Deleted:	0
Error Log:	94_General Payments

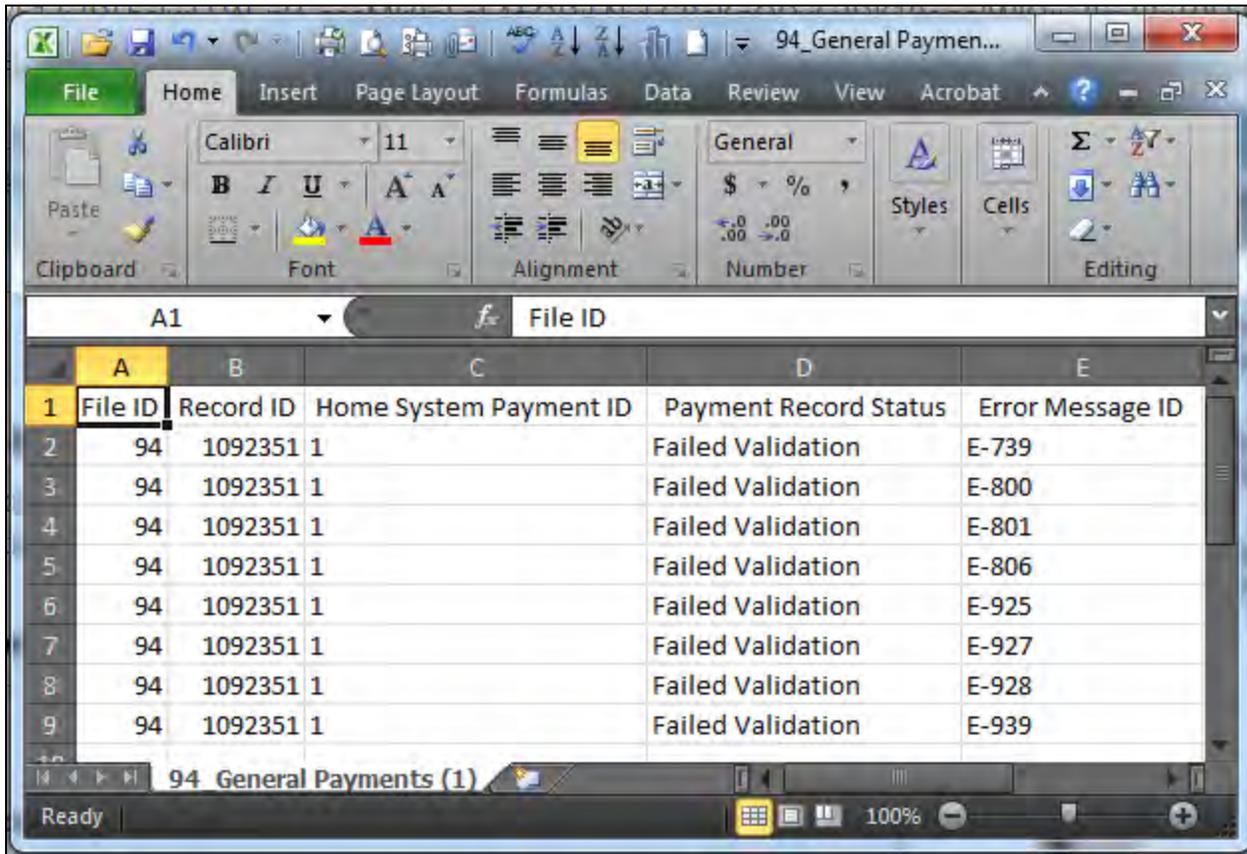
[Back to Payment Category](#)

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- [Review](#) the Open Payments Privacy Policy [PDF, 102 KB]



Open Payments User Guide

A sample Error Log is shown below. The codes listed in the “Error Message ID” column are error codes.



	A	B	C	D	E
1	File ID	Record ID	Home System Payment ID	Payment Record Status	Error Message ID
2	94	1092351	1	Failed Validation	E-739
3	94	1092351	1	Failed Validation	E-800
4	94	1092351	1	Failed Validation	E-801
5	94	1092351	1	Failed Validation	E-806
6	94	1092351	1	Failed Validation	E-925
7	94	1092351	1	Failed Validation	E-927
8	94	1092351	1	Failed Validation	E-928
9	94	1092351	1	Failed Validation	E-939

Step 3: Understand the Error Codes

Once you have determined the error codes for each record, consult the Error Code Key, which is available on the Resources page of the Open Payments website at <http://www.cms.gov/openpayments/About/Resources.html>. The Error Code Key lists error IDs along with a description regarding the relevant data element name, an error description, and steps to avoid and correct the error..

To determine what the error code means and how to correct it, cross-reference the code in the “Error Message ID” field of the error log or the “Records ID” page with the Open Payments Error Code Key.

Step 4: Correct and Re-Submit Records

Follow the instructions in the Error Code Key to correct records. You can correct the record manually in the Open Payments system or resubmit a corrected bulk file containing the corrected records.

Note: If corrections or changes are made to the fields that identify the covered recipient, including principal investigators, after the record has undergone final submission, the original record cannot be corrected. It must be deleted and then re-submitted as a new record.

Open Payments User Guide

- For physicians (including principal investigators), these identifying fields are First Name, Last Name, NPI, License State, and License Number.
- For teaching hospitals, these identifying fields are Teaching Hospital Name, the hospital address fields, and Taxpayer Identification Number.

For information on deleting records, see Section 4.8.

If a record is resubmitted due to a change in the covered recipient, the original covered recipient will no longer see the record in his or her profile; only the new covered recipient will see it.

4.7d: Correcting Records via Bulk File Upload

To correct records via a bulk data file, follow the instructions below:

1. Correct the data elements individually in the bulk data file.
 - If corrections are to address validation or matching errors, make sure all errors listed for those records in that bulk file's Error Log are corrected prior to re-submitting. Refer to the quick reference guide "Identifying and Correcting Validation and Matching Errors" for details on Error Logs.
2. Set the "Resubmission Indicator" field on the changed records to "Y". Enter the original record ID in the "Resubmitted Payment Record ID" field. The system will only accept the record as a re-submission if the "Resubmitted Payment Record ID" field corresponds to the record ID originally assigned to the record by the Open Payments system.
3. Log in to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov/> and select the "Submissions" tab on the toolbar. Select "Bulk File Upload."
4. Submit the file through the normal bulk file upload process. Refer to Section 4.4 for instructions.

4.7e: Correcting Records Manually

To correct individual records manually, 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 on the toolbar. On the "Review Submitted Records" menu, select the reporting entity whose record you wish to view and the program year for that record, and then select "Review Records."
2. On the "Review Records" page, find the payment category (General, Research, or Ownership/Investment) of the record you wish to correct, and select the button labeled "View All."
3. Locate the desired record in the data table at the bottom of the "Payment Category" page. Select the "Edit" hyperlink in the "Action" column for that record.
4. Update the record information and select "Submit."

Section 4.8: Deleting Records

Records submitted to the Open Payments system by applicable manufacturers and applicable group purchasing organizations may require deletion as part of validation, matching, or the review and dispute process. You can delete an individual record or an entire bulk file, which will delete all of the records it contains.

The record deletion process varies depending upon the status of the records to be deleted. Deleting records that are not yet attested to will result in those records being immediately removed from the Open Payments system. Deleting records that were previously attested to will result in those records being placed in a “Marked for Deletion” status rather than immediately deleted.

To complete the deletion of records marked for deletion, the attester for the reporting entity must re-attest to the payments for that program year, which includes attesting to the deletion of previously attested records. Until they are attested, and therefore removed from the system, records in “Marked for Deletion” status remain visible to covered recipients and are eligible for publication

4.8a: Deleting a Bulk File

The process outlined below will delete all unattested records in the data file and mark for deletion all attested records contained in the data file. Records within a deleted file cannot be recovered or viewed once this action is completed.

Step 1: Log in to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov/> and select the “Submissions” tab on the toolbar.

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Manufacturer or Group Purchasing Organization [Switch User Type](#)

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Welcome to the Open Payments System

Announcements

2015 Program Year General Information - The program year 2015 data submission period is now open. Reporting entities may begin submitting and attesting to their data.

Reporting entities registered in a prior program year must be re-certified before any system-related actions can be performed. Review and dispute point of contact information must be provided to complete re-certification. For information on how to re-certify, refer to the quick reference guide "Applicable Manufacturer and Applicable GPO Registration and Re-Certification," located on the Resources page of the Open Payments website.

Review and dispute functionality in the Open Payments system is unavailable until April 2016.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

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

[Access the Open Payments User Guide](#)

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[Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)

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Step 2: On the “Review Submitted Records” menu, select the reporting entity whose records you want to delete and the program year for those records. Select “Review Records.”

The screenshot displays the 'Open Payments (Sunshine Act)' web application interface. At the top, there is a navigation menu with tabs for Home, Submissions, Review and Dispute, Manage Entities, My Profile, and Help. The 'Review and Dispute' tab is active, showing options for 'View, Respond, Resolve'. Below the navigation, the 'Submissions' section is highlighted, with a sub-section for 'Review Submitted Records'. This section contains instructions on how to review records and includes two dropdown menus: '*Select Entity:' with 'ABCD Medical' selected, and '*Select Program Year:' with '2015' selected. A red arrow points to the 'ABCD Medical' dropdown. To the right of these dropdowns is a yellow button labeled 'Review Records', which is circled in red. On the right side of the page, there are several utility links, including 'Access the Open Payments User Guide', 'Need help with the website? Contact Us by email', 'Review the Open Payments Privacy Policy (PDF, 102 KB)', 'Download Physician List', 'Download the Reporting Templates', and 'CSV Templates'.

Open Payments User Guide

Step 3: On the “Review Records” page, find the payment category (General, Research, or Ownership/Investment) of the file you wish to delete and select the button labeled “View All.”

Open Payments (Sunshine Act)

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ABCD Medical- Review Records

Below are the records reported by the entity and categorized by the status for the selected program year. To edit records (available only for a user in a “submitter” role) or view the details of the reported records, select the “View All” button under a specific payment category (e.g., Research Payments, General Payments, etc.).

If all the records for the entity are in a “Ready for Attestation” or “Attested” status, a user in an “attester” role can attest by selecting the “Begin Attestation of All Records” button.

If you have further questions on how to make final submission of records, details on status definitions, or how to attest, use the link available on the right hand navigation.

Select “Notify Attester” to notify attesters that there are records that require re-attestation. All active attesters affiliated with the reporting entity will receive an email notification that there are records which require re-attestation. Records marked for deletion remain eligible for review, dispute, and publication, until re-attestation is complete.

Note: Previously attested records that have been marked for deletion have not yet been deleted from the Open Payments system. The attester must re-attest to all payments for the selected program year to complete the deletion. Records marked for deletion remain eligible for review, dispute, and publication, until re-attestation is complete.

Records counted as “Marked for Deletion” are also included in the “Attested” (†) record count.

[Back to Submissions](#)

[View Attestation](#)

Program Year: 2015

Research Payments [View All](#)

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	1	No Action
Failed Matching Validation	0	Correction
Total Payments	1	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

General Payments [View All](#)

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	1	Correction
Return to Submitter	0	Correction
Attested †	6	No Action
Failed Matching Validation	0	Correction
Total Payments	7	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

Ownership or Investment Interest [View All](#)

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	0	No Action
Failed Matching Validation	0	Correction
Total Payments	0	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

[Access the Open Payments User Guide](#)

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[Review the Open Payments Privacy Policy \(PDF, 102 KB\)](#)

Help with this Page

[Record Status Definitions](#)

[What do I do if records failed validation?](#)

[How do I complete final submission?](#)

[How do I complete attestation?](#)

Open Payments User Guide

Step 4: At the bottom of the “Payment Category” page is a data table. Find one record from the file you wish to delete. Select the hyperlink in that record’s “File ID” column.

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ABCDE Medical 2015 - General Payments

The table below provides details of submitted records for the selected entity, program year, and payment category, as well as the status and required actions for these records. No records will be shown if the entity has not submitted any data under this payment category.

You may customize your view of the records by using the search and filtering tools above the data table.

For more information on the actions you can take on this page, refer to the Quick Reference Guide for the Payments Category Page. For detailed information on how to edit and submit records, refer to the Open Payments User Guide.

You may export your search results into a CSV file by selecting the link labeled "Download". The file will be compressed into a ZIP file. It will contain all data fields displayed in the table shown below. If you attempt to download a file that exceeds the system limit (approximately 400,000 records), you will receive an on-screen error notification. To correct this error, adjust the filtering criteria to create smaller subsets of records and download them in multiple files. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below. Information on how to edit and submit records, refer to the Open Payments User Guide.

You may export your search results into a CSV file by selecting the link labeled "Download". The file will be compressed into a ZIP file. It will contain all data fields displayed in the table shown below. If you attempt to download a file that exceeds the system limit (approximately 400,000 records), you will receive an on-screen error notification. To correct this error, adjust the filtering criteria to create smaller subsets of records and download them in multiple files. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

Records counted as "Marked for Deletion" are also included in the "Attested" (1) record count. If you wish to reinstate records marked for deletion, find the records with the "Marked for Deletion" status of "Yes", select the checkbox next to them, and then select the "Cancel Deletion" button.

General Payments Refresh Status

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	1	Correction
Return to Submitter	0	Correction
Attested	6	No Action
Failed Matching Validation	0	Correction
Total Payments	7	

Note: Previously attested records that have been marked for deletion have not yet been deleted from the Open Payments system. The attester must re-attest to all payments for the selected program year to complete deletion. Until this re-attestation, the marked records remain eligible for review and dispute, are eligible for publication, and are included in the attested record count.

Marked for Deletion	Record Count	Action Required
Attester to confirm deletion	0	Attester to Attest or Reject Deletion

Record Status: Please Select
 Attested
 Ready for Submission
 System Processing
 Failed Validation
 Matching in Progress
 Ready for Attestation
 Failed Matching Validation

File ID: Maximum 38 digits

Record ID: Maximum 38 digits

Delay in Publication Indicator: Please Select

Home System Payment ID:

Marked for Deletion: Yes No

Recipient Type: Covered Recipient Physician Covered Recipient Teaching Hospital

Input Method: Manual Entry Upload Files

Report Type: Single Consolidated

[Search](#) [Clear All](#) [Download](#)

Show Entries: 10 [Cancel Deletion](#) [Return to Submitter](#)

Select All	File ID	Record ID	Home System Payment ID	Payment Date	Amount (\$)	Recipient Type	Recipient	Last Modified Date	Last Modified By	Record Status	Marked for Deletion
<input type="checkbox"/>	04	1092351		20150415	\$24,000.40	Physician	Mary Davis	2015-12-10	Joe Smith	Failed Validation	No
<input type="checkbox"/>	N/A	44702		20150415	\$302.12	Physician	Mary Davis	2015-07-27	Joe Smith	Attested	No
<input type="checkbox"/>	N/A	44898		20150415	\$282.12	Teaching Hospital	WVIZ Teaching Hospital	2015-07-27	Joe Smith	Attested	No
<input type="checkbox"/>	N/A	44892		20150415	\$202.32	Physician	Mary Davis	2015-07-27	Joe Smith	Attested	No
<input type="checkbox"/>	N/A	618881		20150415	\$9.03	Physician	Mary Davis	2015-09-30	Joe Smith	Attested	No
<input type="checkbox"/>	N/A	742291		20150415	\$150.00	Teaching Hospital	WVIZ Teaching Hospital	2015-11-28	Joe Smith	Attested	No
<input type="checkbox"/>	N/A	813018		20150415	\$999.88	Physician	Mary Davis	2015-10-03	Joe Smith	Attested	No

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Step 5: On the “File Properties” page, select “Delete File.”

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home Submissions (Submit, Review, Attest) Review and Dispute (View, Respond, Resolve) Manage Entities (Register, Edit, Nominate, Roles) My Profile (Account, Roles, Nominations) Help

File ID: 94
Details about the File Submitted
Download a copy of the record IDs included in the submitted file, mapped to your Home System Payment IDs and any application error codes.

2015 ABCD Medical

Original Upload File Name:	Gen-7607.csv
Submission Type:	Initial Submission
Original /Resubmission Date:	7/9/2015 4:43 PM
Submitted By:	Joe Smith
File Size:	4 KB
File Type:	CSV
File Status:	Submitted With Errors
Total Payments:	\$24,000.40
Number of Records Deleted:	0
Error Log:	94_General Payments

Back to Payment Category **Delete File**

Access the Open Payments User Guide
Need help with the website? Contact Us by email
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Step 6: An on-screen message will appear to confirm you want to delete the file. To proceed with deletion, select the “Delete” button. To cancel, select “Cancel.”

Open Payments (Sunshine Act)

Delete File
Delete the following file and all its records:

File ID: 94

Original Upload File Name: Gen-7607.csv
Submission Type: SUBMIT_FILE
Original /Resubmission Date: 7/9/2015 4:43 PM
Submitted By: Joe Smith
File Size: 4 KB
File Type: SUBMIT_FILE

Original /Resubmission Date: 7/9/2015 4:43 PM
Submitted By: Joe Smith
File Size: 4 KB
File Type: SUBMIT_FILE

Original /Resubmission Date: 7/9/2015 4:43 PM
Submitted By: Joe Smith
File Size: 4 KB
File Type: SUBMIT_FILE

Submitted By: Joe Smith
File Size: 4 KB
File Type: SUBMIT_FILE

File Status: Initial Submission
Total Payments: 24000.4
Number of Records Deleted: 0
Error Log: 94_General Payments

Deleting this file will delete all records it contains from the Open Payments system. These records will be deleted even if they had been edited or re-submitted after the initial file submission. Note that deleting records with “Attested” status requires agreement and re-attestation by the reporting entity’s attester. Attested records will not be deleted from the Open Payments system until re-attestation takes place.

Are you sure you want to delete the file? Select “Delete” to delete the file. Select “Cancel” to cancel the action.

Cancel **Delete**

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If any records from this bulk file had been previously attested to, the previously attested records will not be immediately deleted but marked for deletion. To delete records marked for deletion, the attester for the reporting entity must re-attest to the payments for that program year.

4.8b: Deleting an Individual Record

The process below will delete an individual unattested record and mark for deletion an individual attested record.

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

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home **Submissions** (Submit, Review, Attest) **Review and Dispute** (View, Respond, Resolve) **Manage Entities** (Register, Edit, Nominate Roles) **My Profile** (Account, Roles, Nominations) **Help**

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - The program year 2015 data submission period is now open. Reporting entities may begin submitting and attesting to their data.

Reporting entities registered in a prior program year must be re-certified before any system-related actions can be performed. Review and dispute point of contact information must be provided to complete re-certification. For information on how to re-certify, refer to the quick reference guide "Applicable Manufacturer and Applicable GPO Registration and Re-Certification," located on the Resources page of the Open Payments website.

Review and dispute functionality in the Open Payments system is unavailable until April 2016.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

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
- Review** the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: On the “Review Submitted Records” menu, select the reporting entity whose record you want to delete and the program year for those records. Select “Review Records.”

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Submissions

A field with an asterisk (*) is required.

Applicable manufacturers and applicable group purchasing organizations (GPOs) must submit payments, other transfers of value, and ownership or investment interests to the Open Payments system.

Data Submission

Users who hold the role of submitter can submit information about payments, other transfers of value, and ownership or investment interests to the Open Payments system via bulk file upload or manual data entry.

Bulk file upload allows you to submit multiple records in a single CSV file. Manual data entry allows you to submit records manually using the Open Payments system graphic user interface (GUI) rather than creating a data file.

Select Data Submission Method:
Select your preferred method of data submission below.

Bulk File Upload
Manual Data Entry

Review Submitted Records

Once data has been submitted, any active user associated with that entity can review all records submitted for that entity. To review records, select the name of the entity whose records you wish to review and the program year for the records from the dropdown lists below, then select "Review Records."

Select Entity: ABCDEF Medical Select Program Year: 2015 Review Records

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Download Physician List

The Validated Physician List below should not be shared publicly.

Validated Physician List

Download the Reporting Templates

The most recent versions of the reporting template files are below.

CSV Templates

- Open Payments Research Template.csv
- Open Payments General Template.csv
- Open Payments OwnerInvestor Template.csv

Download All Templates

Open Payments Templates

Open Payments User Guide

Step 3: On the “Review Records” page, find the payment category (General, Research, or Ownership/Investment) of the record you wish to delete and select the button labeled “View All.”

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ABCDEF Medical 2015 - Review Records

Below are the records reported by the entity and categorized by the status for the selected program year. To edit records (available only for a user in a “submitter” role) or view the details of the reported records, select the “View All” button under a specific payment category (e.g., Research Payments, General Payments, etc.).

If all the records for the entity are in a “Ready for Attestation” or “Attested” status, a user in an “attester” role can attest by selecting the “Begin Attestation of All Records” button.

If you have further questions on how to make final submission of records, details on status definitions, or how to attest, use the link available on the right hand navigation.

Select “Notify Attester” to notify attesters that there are records that require re-attestation. All active attesters affiliated with the reporting entity will receive an email notification that there are records which require re-attestation. Records marked for deletion remain eligible for review, dispute, and publication, until re-attestation is complete.

Note: Previously attested records that have been marked for deletion have not yet been deleted from the Open Payments system. The attester must re-attest to all payments for the selected program year to complete the deletion. Records marked for deletion remain eligible for review, dispute, and publication, until re-attestation is complete.

Records counted as “Marked for Deletion” are also included in the “Attested” (†) record count.

Back to Submissions

View Attestation

Program Year: 2015

Research Payments View All

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	2	No Action
Failed Matching Validation	0	Correction
Total Payments	2	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

General Payments View All

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	2	No Action
Failed Matching Validation	0	Correction
Total Payments	2	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

Ownership or Investment Interest View All

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	1	No Action
Failed Matching Validation	0	Correction
Total Payments	1	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

Open Payments User Guide

Step 4: At the bottom of the “Payment Category” page is a data table. To delete a record, select that record in the data table by selecting the corresponding checkbox and select the “Delete Selected” button. A confirmation message will be displayed prompting the user to confirm if they would like to delete the record or not.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

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ABCDEF Medical 2015 - Research Payments

The table below provides details of submitted records for the selected entity, program year, and payment category, as well as the status and required actions for these records. No records will be shown if the entity has not submitted any data under this payment category.

You may customize your view of the records by using the search and filtering tools above the data table.

For more information on the actions you can take on this page, refer to the Quick Reference Guide for the Payments Category Page. For detailed information on how to edit and submit records, refer to the Open Payments User Guide.

You may export your search results into a CSV file by selecting the link labeled "Download". The file will be compressed into a ZIP file. It will contain all data fields displayed in the table shown below. If you attempt to download a file that exceeds the system limit (approximately 400,000 records), you will receive an on-screen error notification. To correct this error, adjust the filtering criteria to create smaller subsets of records and download them in multiple files. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

information on how to edit and submit records, refer to the Open Payments User Guide.

You may export your search results into a CSV file by selecting the link labeled "Download". The file will be compressed into a ZIP file. It will contain all data fields displayed in the table shown below. If you attempt to download a file that exceeds the system limit (approximately 400,000 records), you will receive an on-screen error notification. To correct this error, adjust the filtering criteria to create smaller subsets of records and download them in multiple files. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

Records counted as "Marked for Deletion" are also included in the "Attested" (t) record count. If you wish to re-atstate records marked for deletion, find the records with the "Marked for Deletion" status of "Yes", select the checkbox next to them, and then select the "Cancel Deletion" button.

Research Payments Refresh Status

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested (t)	2	No Action
Failed Matching Validation	0	Correction
Total Payments	2	

Note: Previously attested records that have been marked for deletion have not yet been deleted from the Open Payments system. The attester must re-atstate to all payments for the selected program year to complete deletion. Until this re-attestation, the marked records remain eligible for review and dispute, are eligible for publication, and are included in the attested record count.

Marked for Deletion	Record Count	Action Required
<input type="checkbox"/> Attester to confirm deletion	0	Attester to Attest or Reject Deletion

Back to Review Records

Record Status:
Please Select

- Attested
- Ready for Submission
- System Processing
- Failed Validation
- Matching in Progress
- Ready for Attestation
- Failed Matching Validation

File ID:
Maximum 38 digits

Delay in Publication Indicator:
Please Select

Record ID:
Maximum 38 digits

Home System Payment ID:

Marked for Deletion:

Yes

No

Recipient Type:

- Covered Recipient Physician
- Covered Recipient Teaching Hospital
- Non-covered Recipient Entity
- Non-covered Recipient Individual

Input Method:

- Manual Entry
- Upload Files

Report Type:

- Single
- Consolidated

Search
Clear All
Download

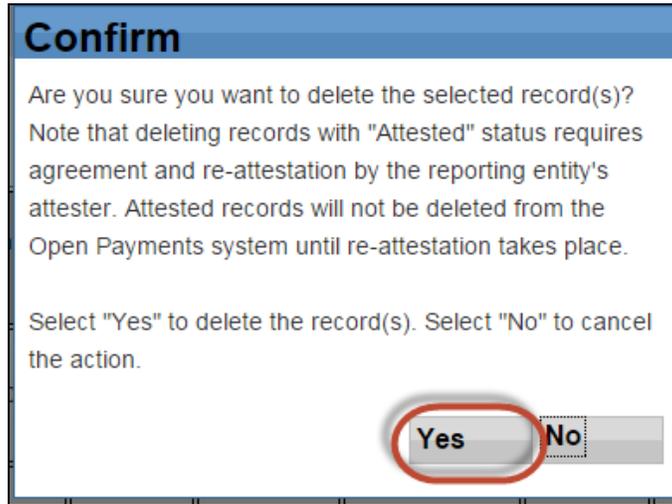
Cancel Deletion
Return to Attester
Delete Selected
Return to Submitter

Select	File ID	Record ID	Home System Payment ID	Payment Date	Amount (\$)	Recipient Type	Recipient	Last Modified Date	Last Modified By	Record Status	Marked for Deletion	Delete
<input checked="" type="checkbox"/>	N/A	1109015		20150914	\$3,000.00	Covered Recipient Teaching Hospital	ABCDEF Teaching Hospital	2015-12-15	Susan Jones	Attested	No	No D Req.
<input type="checkbox"/>	N/A	1109016		20150111	\$10,000.00	Covered Recipient Teaching Hospital	WXYZ Teaching Hospital	2015-12-15	Mary Davis	Attested	No	No D Req.

Page 1 of 1
Showing 2 of 2 Entries
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Open Payments User Guide

Step 5: An on-screen message will appear to confirm you want to delete the file. To proceed with deletion, select the “Delete” button. To cancel, select “Cancel.”



If the record had been previously attested to, it will not be immediately deleted but marked for deletion. To delete records marked for deletion, the attester for the reporting entity must re-attest to the payments for that program year.

4.8c: Viewing Records Marked for Deletion

To find records that have been marked for deletion, follow the steps below.

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



Open Payments User Guide

Step 2: From the “Submissions” tab, use the drop-down list to select the reporting entity and program year for which you want to perform attestation and select “Review Records.”

The screenshot displays the 'Open Payments (Sunshine Act)' web application interface. At the top, there is a navigation menu with tabs: Home, Submissions (selected), Review and Dispute, Manage Entities, My Profile, and Help. Below the navigation, the 'Submissions' section is active, showing instructions for data submission and a 'Select Data Submission Method' section with buttons for 'Bulk File Upload' and 'Manual Data Entry'. On the right side, there are several utility links: 'Access the Open Payments User Guide', 'Need help with the website? Contact Us by email', 'Review the Open Payments Privacy Policy [PDF, 102 KB]', 'Download Physician List', and 'Download the Reporting Templates'. At the bottom of the page, there are two dropdown menus: 'Select Entity:' with 'ABCDEF Medical' selected, and 'Select Program Year:' with '2015' selected. A red arrow points to the 'Review Records' button, which is highlighted with a yellow border.

Open Payments User Guide

Step 3: Select “View All” next to the payment category for the records you wish to review.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home
Submissions
Submit, Review, Attest
Review and Dispute
View, Respond, Resolve
Manage Entities
Register, Edit, Nominate Roles
My Profile
Account, Roles, Notifications
Help

ABCDEF Medical 2015 - Review Records

Below are the records reported by the entity and categorized by the status for the selected program year. To edit records (available only for a user in a “submitter” role) or view the details of the reported records, select the “View All” button under a specific payment category (e.g., Research Payments, General Payments, etc.).

If all the records for the entity are in a “Ready for Attestation” or “Attested” status, a user in an “attester” role can attest by selecting the “Begin Attestation of All Records” button.

If you have further questions on how to make final submission of records, details on status definitions, or how to attest, use the link available on the right hand navigation.

Select “Notify Attester” to notify attesters that there are records that require re-attestation. All active attesters affiliated with the reporting entity will receive an email notification that there are records which require re-attestation. Records marked for deletion remain eligible for review, dispute, and publication, until re-attestation is complete.

Note: Previously attested records that have been marked for deletion have not yet been deleted from the Open Payments system. The attester must re-attest to all payments for the selected program year to complete the deletion. Records marked for deletion remain eligible for review, dispute, and publication, until re-attestation is complete.

Records counted as “Marked for Deletion” are also included in the “Attested” (†) record count.

[Back to Submissions](#)

[View Attestation](#)

Program Year: 2015

Research Payments

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	2	No Action
Failed Matching Validation	0	Correction
Total Payments	2	

[View All](#)

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

General Payments

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	2	No Action
Failed Matching Validation	0	Correction
Total Payments	2	

[View All](#)

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

Ownership or Investment Interest

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	1	No Action
Failed Matching Validation	0	Correction
Total Payments	1	

[View All](#)

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

[Access the Open Payments User Guide](#)

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

[Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)

Help with this Page

[Record Status Definitions](#)

[What do I do if records failed validation?](#)

[How do I complete final submission?](#)

[How do I complete attestation?](#)

Open Payments User Guide

Step 4: On the following page, in the Record Status filter box, check the box for “Yes” under the heading “Marked for Deletion.” Select “Search.” This will display all the records “Marked for Deletion.” Return to the “Review Records” page when you are ready to attest.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

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View, Respond, Resolve
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My Profile
Account, Roles, Normations
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ABCDEF Medical 2015 - Research Payments

The table below provides details of submitted records for the selected entity, program year, and payment category, as well as the status and required actions for these records. No records will be shown if the entity has not submitted any data under this payment category.

You may customize your view of the records by using the search and filtering tools above the data table.

For more information on the actions you can take on this page, refer to the Quick Reference Guide for the Payments Category Page. For detailed information on how to edit and submit records, refer to the Open Payments User Guide.

You may export your search results into a CSV file by selecting the link labeled “Download”. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table shown below. If you attempt to download a file that exceeds the system limit (approximately 400,000 records), you will receive an on-screen error notification. To correct this error, adjust the filtering criteria to create smaller subsets of records and download them in multiple files. To view all fields for a record, select the “Record ID” hyperlink next to the record you want to view in the table below.

To view all fields for a record, select the “Record ID” hyperlink next to the record you want to view in the table below.

Records counted as “Marked for Deletion” are also included in the “Attested (+)” record count. If you wish to reinstate records marked for deletion, find the records with the “Marked for Deletion” status of “Yes”, select the checkbox next to them, and then select the “Cancel Deletion” button.

Research Payments Refresh Status

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested +	2	No Action
Failed Matching Validation	0	Correction
Total Payments	2	

Note: Previously attested records that have been marked for deletion have not yet been deleted from the Open Payments system. The attester must re-attest to all payments for the selected program year to complete deletion. Until this re-attestation, the marked records remain eligible for review and dispute, are eligible for publication, and are included in the attested record count.

Marked for Deletion	Record Count	Action Required
+ Attester to confirm deletion	1	Attester to Attest or Reject Deletion

Back to Review Records

Record Status:

Please Select

- Attested
- Ready for Submission
- System Processing
- Failed Validation
- Matching in Progress
- Ready for Attestation
- Failed Matching Validation

File ID:

Maximum 38 digits

Delay in Publication Indicator:

Please Select

Record ID:

Maximum 38 digits

Home System Payment ID:

Marked for Deletion:

Yes

No

Recipient Type:

Covered Recipient Physician

Covered Recipient Teaching Hospital

Non-covered Recipient Entity

Non-covered Recipient Individual

Input Method:

Manual Entry

Upload Files

Report Type:

Single

Consolidated

Search
Clear All
Download

Show Entries 10 ▾

Cancel Deletion
Return to Attester
Delete Selected
Return to Submitter

Select	File ID	Record ID	Home System Payment ID	Payment Date	Amount (\$)	Recipient Type	Recipient	Last Modified Date	Last Modified By	Record Status	Marked for Deletion	Data Path Ind.
<input type="checkbox"/>	N/A	1100515		20150911	\$3,000.00	Covered Recipient Teaching Hospital	ABCDEF Teaching Hospital	2015-12-15	Susan Jones	Attested	Yes	No (1 Req.)

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Section 4.9: Final Submission of Data

Final submission of data occurs after data has been uploaded and each record is error free. To perform final data submission, follow these steps.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials. Navigate to the Open Payments home page and select the “Submissions” tab.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home **Submissions** (Submit, Review, Attest) **Review and Dispute** (View, Respond, Resolve) **Manage Entities** (Register, Edit, Nominate Roles) **My Profile** (Account, Roles, Nominations) **Help**

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - The program year 2015 data submission period is now open. Reporting entities may begin submitting and attesting to their data.

Reporting entities registered in a prior program year must be re-certified before any system-related actions can be performed. Review and dispute point of contact information must be provided to complete re-certification. For information on how to re-certify, refer to the quick reference guide "Applicable Manufacturer and Applicable GPO Registration and Re-Certification," located on the Resources page of the Open Payments website.

Review and dispute functionality in the Open Payments system is unavailable until April 2016.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

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

Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: Select the entity and program year from the drop-down list for which the payments were uploaded and select “Review Records.”

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Submissions
Submit, Review, Attest

Review and Dispute
View, Respond, Resolve

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Submissions

A field with an asterisk (*) is required.

Applicable manufacturers and applicable group purchasing organizations (GPOs) must submit payments, other transfers of value, and ownership or investment interests to the Open Payments system.

Data Submission

Users who hold the role of submitter can submit information about payments, other transfers of value, and ownership or investment interests to the Open Payments system via bulk file upload or manual data entry.

Bulk file upload allows you to submit multiple records in a single CSV file. Manual data entry allows you to submit records manually using the Open Payments system graphic user interface (GUI) rather than creating a data file.

Select Data Submission Method:

Select your preferred method of data submission below.

[Bulk File Upload](#)

[Manual Data Entry](#)

Review Submitted Records

Once data has been submitted, any active user associated with that entity can review all records submitted for that entity. To review records, select the name of the entity whose records you wish to review and the program year for the records from the dropdown lists below, then select "Review Records."

Select Entity: ABCDEF Medical

Select Program Year: 2015

[Review Records](#)

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Download Physician List

The Validated Physician List below should not be shared publicly.

[Validated Physician List](#)

Download the Reporting Templates

The most recent versions of the reporting template files are below.

CSV Templates

- [Open Payments Research Template.csv](#)
- [Open Payments General Template.csv](#)
- [Open Payments OwnerInvestor Template.csv](#)

Download All Templates

[Open Payments Templates](#)

Open Payments User Guide

Step 3: On the “Review Records” page, you will see a summary of all records that have been submitted for that entity. The three payment types will be in separate boxes. In each box is a series of statuses and the number of records currently in that status for the entity. Note that the numbers displayed are for all records submitted for the entity to date. The statuses are the following:

- **Ready for Submission:** Records ready for final submission.
- **System Processing:** Records being processed by the system for field validation checks.
- **Ready for Attestation:** Records which have passed field validation and data matching and are ready for attestation.
- **Failed Validation:** Records which did not pass field validation checks.
- **Returned to Submitter:** Records returned to the submitter by the attester because the records contain errors and require correction.
- **Attested:** Records which have been attested to as accurate by the attester.
- **Failed Matching Validation:** Records which did not pass data matching checks. See Section 4.6 for information on data matching.
- **Total Payments:** Total number of records in the Open Payments system for that reporting entity and payment type.

Also visible is a count of the total number of records that have been **Marked for Deletion**. These are records that have been previously attested to and have been selected for deletion. They will continue to be counted with the other records until records for that program year are re-attested to, which will delete the records marked for deletion.

Select the payment category for which you wish to perform final submission and select “View All” to proceed.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

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

ABCDEF Medical 2015 - Review Records

Below are the records reported by the entity and categorized by the status for the selected program year. To edit records (available only for a user in a "submitter" role) or view the details of the reported records, select the "View All" button under a specific payment category (e.g., Research Payments, General Payments, etc.).

If all the records for the entity are in a "Ready for Attestation" or "Attested" status, a user in an "attester" role can attest by selecting the "Begin Attestation of All Records" button.

If you have further questions on how to make final submission of records, details on status definitions, or how to attest, use the link available on the right hand navigation.

Select "Notify Attester" to notify attesters that there are records that require re-attestation. All active attesters affiliated with the reporting entity will receive an email notification that there are records which require re-attestation. Records marked for deletion remain eligible for review, dispute, and publication, until re-attestation is complete.

Note: Previously attested records that have been marked for deletion have not yet been deleted from the Open Payments system. The attester must re-attest to all payments for the selected program year to complete the deletion. Records marked for deletion remain eligible for review, dispute, and publication, until re-attestation is complete.

Records counted as "Marked for Deletion" are also included in the "Attested" (†) record count.

[Back to Submissions](#)

Program Year: 2015

Research Payments

[View All](#)

Status	Record Count	Action Required
Ready for Submission	1	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	0	No Action
Failed Matching Validation	0	Correction
Total Payments	1	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

General Payments

[View All](#)

Status	Record Count	Action Required
Ready for Submission	1	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	0	No Action
Failed Matching Validation	0	Correction
Total Payments	1	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

Ownership or Investment Interest

[View All](#)

Status	Record Count	Action Required
Ready for Submission	1	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	0	No Action
Failed Matching Validation	0	Correction
Total Payments	1	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

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[Review the Open Payments Privacy Policy \(PDF, 102 KB\)](#)

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[How do I complete final submission?](#)
[How do I complete attestation?](#)



Open Payments User Guide

Step 4: The “Payment Category Page” displays all records submitted for the selected payment category and program year along with their processing status. To proceed with final submission, select “Final Submission.”

The “Final Submission” button will only be enabled once all records are in “Ready for Submission” status. If this button is not enabled, review the status column on the left side of the page. If any records are in the statuses listed below, you cannot perform final submission for that payment type.

- System Processing - Records which the Open Payments system is still processing and validating.
- Failed Validation - Records which did not pass field validation checks.
- Failed Matching Validation - Records which were not successfully matched to a valid covered recipient.

Records in “System Processing” status will change to another status automatically when processing completes. To correct records that failed validation or matching validation, refer to Section 4.7.

Note: You can download the record information returned by searches on this page to a CSV file by selecting the “Download” button on the page. The download file will contain all of the columns of data displayed on the Payment Category page. Filters applied on the page will be applied to the download. Downloaded data files cannot exceed the acceptable record limit (approximately 400,000 records). To download more than the acceptable record limit, apply filtering criteria to create smaller subsets of records and download them in multiple files.

Open Payments User Guide

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

Home	Submissions Submit, Review, Attest	Review and Dispute View, Respond, Resolve	Manage Entities Register, Edit, Nominate Roles	My Profile Account, Roles, Nominations	Help
-------------	----------------------------------------------	-----------------------------------------------------	----------------------------------------------------------	--------------------------------------------------	-------------

ABCDEF Medical 2015 - General Payments

The table below provides details of submitted records for the selected entity, program year, and payment category, as well as the status and required actions for these records. No records will be shown if the entity has not submitted any data under this payment category.

You may customize your view of the records by using the search and filtering tools above the data table.

For more information on the actions you can take on this page, refer to the [Quick Reference Guide for the Payments Category Page](#). For detailed information on how to edit and submit records, refer to the [Open Payments User Guide](#).

You may export your search results into a CSV file by selecting the link labeled "Download". The file will be compressed into a ZIP file. It will contain all data fields displayed in the table shown below. If you attempt to download a file that exceeds the system limit (approximately 400,000 records), you will receive an on-screen error notification. To correct this error, adjust the filtering criteria to create smaller subsets of records and download them in multiple files. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

Records counted as "Marked for Deletion" are also included in the "Attested" (†) record count. If you wish to reinstate records marked for deletion, find the records with the "Marked for Deletion" status of "Yes", select the checkbox next to them, and then select the "Cancel Deletion" button.

General Payments Refresh Status

Status	Record Count	Action Required
Ready for Submission	1	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	0	No Action
Failed Matching Validation	0	Correction
Total Payments	1	

Note: Previously attested records that have been marked for deletion have not yet been deleted from the Open Payments system. The attester must re-attest to all payments for the selected program year to complete deletion. Until this re-attestation, the marked records remain eligible for review and dispute, are eligible for publication, and are included in the attested record count.

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion	0	Attester to Attest or Reject Deletion

Final Submission

[Back to Review Records](#)

Record Status: Please Select Attested Ready for Submission System Processing Failed Validation Matching in Progress Ready for Attestation Failed Matching Validation	File ID: Maximum 38 digits <input type="text"/>	Delay in Publication Indicator: Please Select ▼
	Record ID: Maximum 38 digits <input type="text"/>	Home System Payment ID: <input type="text"/>

Marked for Deletion: <input type="checkbox"/> Yes <input type="checkbox"/> No	Recipient Type: <input type="checkbox"/> Covered Recipient Physician <input type="checkbox"/> Covered Recipient Teaching Hospital	Input Method: <input type="checkbox"/> Manual Entry <input type="checkbox"/> Upload Files	Report Type: <input type="checkbox"/> Single <input type="checkbox"/> Consolidated
--------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------

Search
Clear All
Download

Show Entries 10 ▼

Cancel Deletion
Return to Attester
Delete Selected

Select	File ID	Record ID	Home System Payment ID	Payment Date	Amount(\$)	Recipient Type	Recipient	Last Modified Date	Last Modified By	Record Status	Marked for Deletion	Delay in Publication
<input type="checkbox"/>	N/A	1106615		20150401	\$5,000.00	Teaching Hospital	XYZ Teaching Hospital	2015-12-15	Susan Jones	Ready for Submission	No	No D Req

<< < Page 1 of 1 > >> Showing 1 of 1 Entries Page 1 Go

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Step 5: The following page will allow you to review summary details of your submission. If those details are correct, select “Submit as Final Submission.”

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Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home | **Submissions** (Submit, Review, Attest) | **Review and Dispute** (View, Respond, Resolve) | **Manage Entities** (Register, Edit, Nominate Roles) | **My Profile** (Account, Roles, Nominations) | **Help**

Confirm Final Submission

Confirm the final submission for this data category.

Note: Once a record has undergone final submission, the covered recipient identifying information in that record (e.g., physician first name and last name, NPI, license information) is locked and cannot be edited. To change covered recipient identifying information in a record that has undergone final submission, you must delete the original record and submit a new record with updated covered recipient identifying information.

ABCDEF Medical
2015 General Payments
Total Value: \$5,000.00

Submitter Name: Susan Jones
12/15/2015 8:58 AM

[Cancel](#) [Submit as Final Submission](#)

- [Access](#) the Open Payments User Guide
- Need help with the website? [Contact Us](#) by email
- [Review](#) the Open Payments Privacy Policy [PDF, 102 KB]

An email notification will automatically be sent to the attester informing them that there are records ready for attestation if, upon your selecting “Submit as Final Submission” :

- All records across all payment categories are in “Ready for Attestation” status and;
- No records for that program year have previously undergone attestation.

If records for the program year have already undergone attestation and re-attestation is required, go to the “Review Records” page and select the “Notify Attester” button once all records are ready for the attester to review. This button sends an email notification to the attester informing them that there are records ready for attestation. Re-attestation is required when any previously attested data is changed, including any data fields, delay in publication indicator, or deletion of records. The “Notify Attester” button will only be enabled if there are records in “Attested” or “Ready for Attestation” status.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

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ABCDEF Medical 2015 - Review Records

Confirmation:

- You have successfully submitted your records in to Open Payments.

Below are the records reported by the entity and categorized by the status for the selected program year. To edit records (available only for a user in a "submitter" role) or view the details of the reported records, select the "View All" button under a specific payment category (e.g., Research Payments, General Payments, etc.).

If all the records for the entity are in a "Ready for Attestation" or "Attested" status, a user in an "attester" role can attest by selecting the "Begin Attestation of All Records" button.

If you have further questions on how to make final submission of records, details on status definitions, or how to attest, use the link available on the right hand navigation.

Select "Notify Attester" to notify attesters that there are records that require re-attestation. All active attesters affiliated with the reporting entity will receive an email notification that there are records which require re-attestation. Records marked for deletion remain eligible for review, dispute, and publication, until re-attestation is complete.

Note: Previously attested records that have been marked for deletion have not yet been deleted from the Open Payments system. The attester must re-attest to all payments for the selected program year to complete the deletion. Records marked for deletion remain eligible for review, dispute, and publication, until re-attestation is complete.

Records counted as "Marked for Deletion" are also included in the "Attested" (†) record count.

[Back to Submissions](#)

Program Year: 2015

Research Payments [View All](#)

Status	Record Count	Action Required
Ready for Submission	1	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	0	No Action
Failed Matching Validation	0	Correction
Total Payments	1	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

General Payments [View All](#)

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	1	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	0	No Action
Failed Matching Validation	0	Correction
Total Payments	1	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

Ownership or Investment Interest [View All](#)

Status	Record Count	Action Required
Ready for Submission	1	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	0	No Action
Failed Matching Validation	0	Correction
Total Payments	1	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

- [Access the Open Payments User Guide](#)
- [Need help with the website? Contact Us by email](#)
- [Review the Open Payments Privacy Policy \(PDF, 102 KB\)](#)

Help with this Page

- [Record Status Definitions](#)
- [What do I do if records failed validation?](#)
- [How do I complete final submission?](#)
- [How do I complete attestation?](#)

Repeat the final submission process for all three payment categories. Once all records are in "Ready for Attestation" status, follow the instructions in Section 4.13 to complete attestation.

Section 4.10: Delay in Publication

Certain research payments or other transfers of value made to a covered recipient by an applicable manufacturer or applicable GPO may be delayed from publication. All payments or other transfers of value that are related to research, as defined in 42 C.F.R. § 403.902, and are made pursuant to a written research agreement for research related to new products, will be granted a delay in publication if one is requested.

However, payments or other transfers of value related to research for new applications of products already on the market will be treated differently due to the statutory distinction between new products and new applications of existing products. Pursuant to the statute, payments related to research on new applications of existing products will be granted a delay only if the research does not meet the definition of “clinical investigation.”

A delay in publication can only be requested up to a period of four years from date of payment. After four years have elapsed, the delayed records will be published.

Applicable manufacturers and applicable GPOs must request the delay in publication annually (up to four years) on records that have indicated a request for a delay in publication in a previous program year (if that designation is still applicable for that record). If the request for delay in publication is not renewed by the submission deadline for that program year, the record will be published.

Applicable manufacturers and applicable GPOs that do **not** request a delay in publication of a payment or other transfer of value should indicate within the record that no delay is requested. In addition, when a delay in publication is requested or renewed for a new program year, re-attestation of the record(s) must be completed by the submission deadline for that program year.

4.10a: Eligibility for Delay in Publication

Records are eligible for a delay in publication if they relate to one of the following:

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

4.10b: Initially Requesting a Delay in Publication

If you are manually submitting a record, you can request a delay in publication for that record using the “Delay in Publication of Research Payment Indicator” drop-down list, selecting either “R&D on New Product” or “Clinical Investigation on New Product” as appropriate. For general payment records, the delay in publication indicator is found on the “General Record Information” page. For research payment records, the delay in publication indicator is found on the “Research Payment or Other Transfer of Value Information” page. Ownership/investment records cannot be delayed.

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For a general payment record, ensure that the name of the research study is displayed in the “Contextual Information” field. This is a free-form text field where you can also enter any additional information you deem helpful or appropriate information regarding the payment or other transfer of value.

If you are submitting a record via bulk file, you can request a delay in publication for that record by populating the “Delay in Publication of Research Payment Indicator” field. Enter either a value of ‘1’ to request a delay because the record relates to research and development on a new product or ‘2’ to request a delay because the record relates to clinical investigation on a new product.

If the record is a general payment record, provide the name of the research study in the “Contextual Information” field as well as any additional information about the payment that might be helpful. If the record is a research payment record, populate the fields “Name of Study” and “Context of Research.” In the “Context of Research” field, provide any additional information about the payment that might be helpful.

4.10c: Renewing a Delay in Publication

You may request that your payment records have their publication delayed for up to four years after the date of payment. The request for a delay must be renewed each year. **If this request is not renewed each year by the end of the data submission period, the record will be automatically flagged for publication in the next publication cycle.**

Records where a delay in publication had previously been requested that are eligible for renewal are marked with one of two Delay in Publication statuses: “Pending Renewal – R&D on New Product” or “Pending Renewal – Clinical Investigation on New Product.” Records whose delays are not renewed by the submission deadline are given a status of “Delay Not Renewed – R&D on New Product” or “Delay Not Renewed – Clinical Investigation on New Product.”

You may also request that records previously flagged as delayed for publication be published. Those records will have their Delay in Publication status updated to “No Delay Requested” and become eligible for publication in the next publication cycle.

After renewing delay in publication flags via manual editing or bulk file upload, all records for that program year must be attested to again for the delay to be accepted. Refer to Section 4.13, “Attestation and Assumptions” for additional guidance on attestation. Instructions on finding records eligible for delay in publication renewals and the renewal process follow.

4.10c(1): Finding Records Eligible for a Renewal in Delay in Publication

To find which records previously delayed for publication are eligible for delay in publication renewal, follow the steps below.

- 1) Log in to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov/>. Select the “Submissions” tab on the menu bar.

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- 2) Under the “Review Submitted Records” section on the “Submissions” landing page, select the entity whose records you wish to review and the program year for those records. Select “Review Records.”
- 3) On the “Review Records” page, find the payment category of the record you wish to review and select the button labeled “View All.” Note: Delays in publication can only be requested for general and research payment records.
- 4) All records submitted for the reporting entity for that payment category will appear in the search regardless of the method they were submitted. Using the “Delay in Publication Indicator” filter above the data table. Search for records with a status of either “Pending Renewal – R&D on New Product” or “Pending Renewal – C. I. on New Product.”
- 5) The Open Payments system will return results for all records with a delay in publication status of “Renew.” You may then proceed to either renew the requested delay in publication for the upcoming year or update the record to indicate that a delay in publication is no longer requested.

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Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

Home	Submissions Submit , Review , Attest	Review and Dispute View, Respond, Resolve	Manage Entities Register, Edit, Nominate Roles	My Profile Account, Roles, Nominations	Help
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ABCDEF Medical 2015 - General Payments

The table below provides details of submitted records for the selected entity, program year, and payment category, as well as the status and required actions for these records. No records will be shown if the entity has not submitted any data under this payment category.

You may customize your view of the records by using the search and filtering tools above the data table.

For more information on the actions you can take on this page, refer to the Quick Reference Guide for the Payments Category Page. For detailed information on how to edit and submit records, refer to the Open Payments User Guide.

You may export your search results into a CSV file by selecting the link labeled "Download". The file will be compressed into a ZIP file. It will contain all data fields displayed in the table shown below. If you attempt to download a file that exceeds the system limit (approximately 400,000 records), you will receive an on-screen error notification. To correct this error, adjust the filtering criteria to create smaller subsets of records and download them in multiple files. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

Records counted as "Marked for Deletion" are also included in the "Attested" (†) record count. If you wish to reinstate records marked for deletion, find the records with the "Marked for Deletion" status of "Yes", select the checkbox next to them, and then select the "Cancel Deletion" button.

[Refresh Status](#)

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	2	No Action
Failed Matching Validation	0	Correction
Total Payments	2	

Note: Previously attested records that have been marked for deletion have not yet been deleted from the Open Payments system. The attester must re-attest to all payments for the selected program year to complete deletion. Until this re-attestation, the marked records remain eligible for review and dispute, are eligible for publication, and are included in the attested record count.

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion	0	Attester to Attest or Reject Deletion

[Back to Review Records](#)

Record Status:

Please Select

- Attested
- Ready for Submission
- System Processing
- Failed Validation
- Matching in Progress
- Ready for Attestation
- Failed Matching Validation

File ID:
Maximum 38 digits

Delay In Publication Indicator:

Please Select

Record ID:
Maximum 38 digits

Home System Payment ID:

Marked for Deletion:

Yes

No

Recipient Type:

Covered Recipient Physician

Covered Recipient Teaching Hospital

Input Method:

Manual Entry

Upload Files

Report Type:

Single

Consolidated

[Search](#) [Clear All](#) [Download](#)

Show Entries 10

[Cancel Deletion](#) [Return to Attester](#) [Delete Selected](#) [Return to Submitter](#)

Record ID	Home System Payment ID	Payment Date	Amount(\$)	Recipient Type	Recipient	Last Modified Date	Last Modified By	Record Status	Marked for Deletion	Delay in Publication Indicator	Actions
1106637		20151001	\$5,000.00	Teaching Hospital	ABCDE Teaching Hospital	2015-12-15	Mary Davis	Attested	No	No Delay Requested	View Edit
1106615		20150401	\$5,000.00	Teaching Hospital	ABCDE Teaching Hospital	2015-12-15	Susan Jones	Attested	No	No Delay Requested	View Edit

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4.10c(2): Updating or Renewing the Delay in Publication Indicator

To renew or update a record for delay in publication manually via the GUI:

- 1) Locate the record in the data table and select “Edit” from the “Actions” column.
- 2) If it is a general payment record, navigate to the record’s “General Record Information” page. If it is a research payment record, navigate to the “Research Payment or Other Transfer of Value Information” page.
- 3) To Renew a Delay in Publication: From the “Delay in Publication of Research Payment Indicator” drop-down, select either “R&D on New Product” or “Clinical Investigation on New Product.” For a general payment record, ensure that the name of the research study is displayed in the “Contextual Information” field. This is a free-form text field where you can also enter any additional information you deem helpful or appropriate information regarding the payment or other transfer of value can be added to that field if you wish.
- 4) To Indicate No Delay is Requested: Select “No Delay Requested” from the “Delay in Publication of Research Payment Indicator” drop-down. The record will then be eligible for publication in the next publication cycle.
- 5) Select “Continue to Review.” Select “Save Record” to save the changes.
- 6) Re-attest to the data for the program year.

To renew or update a record for delay in publication for a record via bulk file upload:

- 1) In the bulk data file, set the value for the “Delay in Publication of Research Payment Indicator” field:
 - a. To Renew a Delay in Publication: Set the value to ‘1’ if you are requesting a delay because the record relates to research and development on a new product, or ‘2’ if you are requesting a delay because the record relates to clinical investigation on a new product.
 - b. To Indicate No Delay is Requested: Set the value to ‘3,’ which indicates no delay is requested.
- 2) Set the “Resubmission File Indicator” to “Y” and enter the Open Payments record ID created for the record after its initial submission in the “Resubmitted Payment Record ID” field. Note: You must submit the records as a resubmission. If the “Resubmission File Indicator” is not set to “Y”, a new record will be created, resulting in duplicate records and the publication of the original record.
- 3) If the record is a general payment record, provide the name of the research study in the “Contextual Information” field as well as any additional information about the payment that might be helpful. If the record is a research payment record, populate the fields “Name of

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Study” and “Context of Research.” In the “Context of Research” field, provide any additional information about the payment that might be helpful.

- 4) Resubmit the file through the Open Payments system per the standard submission process. Refer to the quick reference guide “Bulk File Upload” located on the Resources page of the Open Payments website for additional guidance.
- 5) Re-attest to the data for the program year.

Section 4.11: Consolidated Reporting

One reporting entity, under common ownership with other reporting entities, may submit and attest to data in the Open Payments system on behalf of those other reporting entities. This process is called consolidated reporting. Consolidated reporting can be performed only via bulk file upload and is not available through manual entry.

Each individual entity contributing to the consolidated report is required to register in the Open Payments system separately.

The individual user who submits the consolidated report must hold the user role of submitter for all reporting entities included in the consolidated report. The individual user who attests to the consolidated report must hold the user role of attester for all entities included in the consolidated report. Note: the attester must hold an “officer” position (e.g., Chief Executive Officer, Chief Financial Officer, etc.) with the entity that submits the report but does not need hold such a position within all of the entities included in the report.

Within the Open Payments system, payment records are affiliated with the individual entities that made the payment, not the entities that submitted the records. Similarly, payment information submitted in consolidated reports will be published as though the information had been submitted by the individual entities. The information will not be published under the submitting entity’s name.

Each record’s “Record ID” page provides the name of the entity that made the payment and the name of the entity that submitted the payment record. Similarly, “Covered Recipient Demographic Information” pages include the name of the entity that made the payment and the name of the entity that submitted the payment record.

4.11a: Performing Consolidated Reporting

To perform consolidated reporting, create separate bulk file(s) for the payment types (general, research, or ownership/investment) that contain payment data from all of the reporting entities included in the consolidated report. For each record:

- Set the “Consolidated Indicator” field in each record within the file to “Y.”
- Provide the name and Open Payments registration ID for the entity submitting the consolidated report in the fields “Applicable Manufacturer or Applicable GPO Name” and “Applicable Manufacturer or Applicable GPO Registration ID.”

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- Provide the name and Open Payments registration ID for the entity that made the individual payment or other transfer of value in the fields “Applicable Manufacturer or Applicable GPO Making Payment Name” and “Applicable Manufacturer or Applicable GPO Making Payment Registration ID.” This may be the same as the entity submitting the file.

The entity names and registration IDs in the records must match exactly those provided during Open Payments registration.

Once the records are complete, submit the bulk file(s) normally. Note that each entity’s records must be attested to separately. Attesting to the records of one of the reporting entities does not attest to all records for all reporting entities in that consolidated report.

Following is an example of how a consolidated report works:

Entity A made a consolidated report submission for itself, Entity B, and Entity C. Entities A, B, and C are all registered within the Open Payments system. Within the bulk data file, each record lists Entity A’s information in the “Applicable Manufacturer or Applicable GPO Name” and “Applicable Manufacturer or Applicable GPO Registration ID” fields. The “Applicable Manufacturer or Applicable GPO Making Payment Name” and “Applicable Manufacturer or Applicable GPO Making Payment Registration ID” fields for each record contains the information for the entity that made that particular payment (Entity A, B, or C).

The submitter of the file must hold the role of submitter for all three entities, A, B, and C. Similarly, the attester must have the role of attester for all three entities, A, B, and C. to attest to records from all three entities.

Once the submission is accepted in the Open Payments system, the payment records for Entity B and Entity C would be listed under those individual entities, and will not be listed under Entity A. When the data is published, the records for Entity A, Entity B, and Entity C will be listed under their own names.

Section 4.12: Third Party Data Submitters

Applicable manufacturers and applicable GPOs may choose to have their data prepared and submitted by a third party organization. Third party organizations may format, prepare, and submit data on behalf of a reporting entity. The role of submitter is the only role third party companies can fulfill within the Open Payments system on behalf of a reporting entity. **A specific individual within the third party must be identified as the submitter, not the third party itself.**

Third party submitters may be associated with multiple reporting entities. In such a case, each reporting entity must have an individual within the third party assigned to the submitter role. Third party submitters will follow the same process outlined earlier in Chapter 4 of this User Guide for validating and submitting data.

Section 4.13: Attestation and Assumptions

Data attestation is how reporting entities affirm and certify that the information being submitted on behalf of the entity is accurate and correct. Only individuals with the designated role of attester may attest to the accuracy of the data in the Open Payments system. The attester will be able to attest to the accuracy, completeness, and timeliness of the data. This applies to all resubmissions as well.

Attestation completes the submission process. Records are not considered fully submitted until attestation is performed upon them. Records attested to after the deadline for that respective program year will be flagged as late.

Attestation is conducted for all records for that program year, across all three payment types.

Therefore, all records for the program year must be in “Ready for Attestation” or “Attested” status for attestation to be performed (i.e., the records have successfully undergone final submission or have been attested to previously).

If the attester believes any of the records are in error, he or she may decline to attest to the records and return selected data to the submitter for correction and review. To do so, the attester selects the records to be returned to the submitter and then selects the “Return to Submitter” button. The submitter must perform the corrective actions requested by the attester or indicate that no action is required. The payment record(s) must then be re-submitted for attestation.

The attester has the option of submitting 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 will be documented in a free-form text field during the attestation process. Users can choose to write free-form text or cut and paste text from another document. Assumptions cannot be longer than 4,000 characters (including spaces) and can be edited later.

Users who knowingly submit to the Open Payments system any misrepresentation or any false, incomplete, or misleading information, may be guilty of a criminal act punishable under law and may be subject to civil penalties in accordance with the Open Payments system disclaimer and Title 18 U.S.C Section 1030.

4.13a: Attestation Statements in the Open Payments System

Below are the attestation statements presented to attesters in the Open Payments system. Attesters are required to confirm these statements by selecting the checkboxes next to each applicable statement. The first two statements must be selected to proceed with the attestation process. The other statements should be selected as applicable.

Note that if a reporting entity is deleting one or more previously attested records, the entity will be required to re-attest and confirm the deletion of the record(s). Entities deleting records as part of the attestation are encouraged to select the sixth attestation statement in addition to the first two.

The text in the Open Payments system reads as follows:

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1. I attest that I am a Chief Executive Officer, Chief Financial Officer, Chief Compliance Officer, or other Officer for the reporting applicable manufacturer or applicable GPO with the authority to attest to the information submitted in the Open Payments system.
2. I attest that the information reported is timely, accurate, and complete to the best of my knowledge and belief.
3. I attest that my entity is only reporting payments or other transfers of value associated with covered drugs, devices, biologicals, or medical supplies based on one or more of the reasons listed below.

If yes to statement 3 above, indicate the reason by selecting at least one of the following reporting limitation statements:

- a. My entity's gross revenue from covered drugs, devices, biologicals or medical supplies constituted less than 10 percent of gross revenue during the fiscal year preceding the reporting year.
 - b. My entity is under common ownership, as defined by 42 C.F.R. § 403.902, with an applicable manufacturer and provides assistance or support to an applicable manufacturer with respect to the production, preparation, propagation, compounding, conversion, marketing, promotion, sale or distribution of a covered drug, device, biological, or medical supply. Therefore, my entity is only required to report payments or other transfers of value associated with covered drugs, devices, biologicals or medical supplies which my entity provided assistance and support to an applicable manufacturer.
 - c. My entity has a separate operating division that does not manufacture any covered drugs, devices, biologicals, or medical supplies. Therefore, my entity is only required to report payments or other transfers of value to covered recipients related to the activities of these separating operating divisions if those payments or other transfers of value are related to a covered drug, device, biological, or medical supply.
 - d. The only covered drug, device, biological, or medical supply manufactured by my entity is pursuant to a written agreement to manufacture a covered drug, device, biological, or medical supply for another entity. My entity does not hold the Food and Drug Administration approval, licensure, or clearance for the covered drug, device, biological, or medical supply, and is not involved in the sale, marketing, or distribution of the covered drug, device, biological, or medical supply. Therefore, my entity is only required to report payments or other transfers of value that are related to one or more covered drugs, devices, biologicals, or medical supplies.
 - e. My entity only manufactures covered drugs, devices, biologicals, or medical supplies.
4. I attest that my entity is requesting a delay in publication for one or more payments or other transfers of value.

If yes, to statement 4 above, indicate one or more of the reasons listed below.

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- a. The payment or other transfers of value is related to research or development of a new drug, device, biological, or medical supply.
 - b. The payment or other transfers of value is related to research or development of a new application of an existing drug, device, biological, or medical supply.
 - c. The payment or other transfers of value is related to clinical investigations regarding a new drug, device, biological, or medical supply.
5. I attest that my entity is submitting a consolidated report because it is under common ownership, as defined by 42 C.F.R. § 403.902, with a separate entity or entities that are also applicable manufacturers.
 6. I am attesting to the action that my entity has deleted one or more records, which have previously been attested, and I am re-attesting that my entity's information reported is accurate and complete to the best of my knowledge and belief.

Note: In the event of data submitted as a consolidated report, each individual entity within the consolidated report must attest to the accuracy of its own data. See Section 4.11 for more information on consolidated reporting.

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4.13b: Attesting to Data in the Open Payments System

The following instructions show the step-by-step pages for the attestation process. Remember that all records must be in “Ready for Attestation” status (or “Attested” status in the case of re-attestation) to complete these steps.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page. Select the “Submissions” tab on the Open Payments system landing page.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home | **Submissions** (Submit, Review, Attest) | Review and Dispute (View, Respond, Resolve) | Manage Entities (Register, Edit, Nominate Roles) | My Profile (Account, Roles, Nominations) | Help

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - The program year 2015 data submission period is now open. Reporting entities may begin submitting and attesting to their data.

Reporting entities registered in a prior program year must be re-certified before any system-related actions can be performed. Review and dispute point of contact information must be provided to complete re-certification. For information on how to re-certify, refer to the quick reference guide “Applicable Manufacturer and Applicable GPO Registration and Re-Certification,” located on the Resources page of the Open Payments website.

Review and dispute functionality in the Open Payments system is unavailable until April 2016.

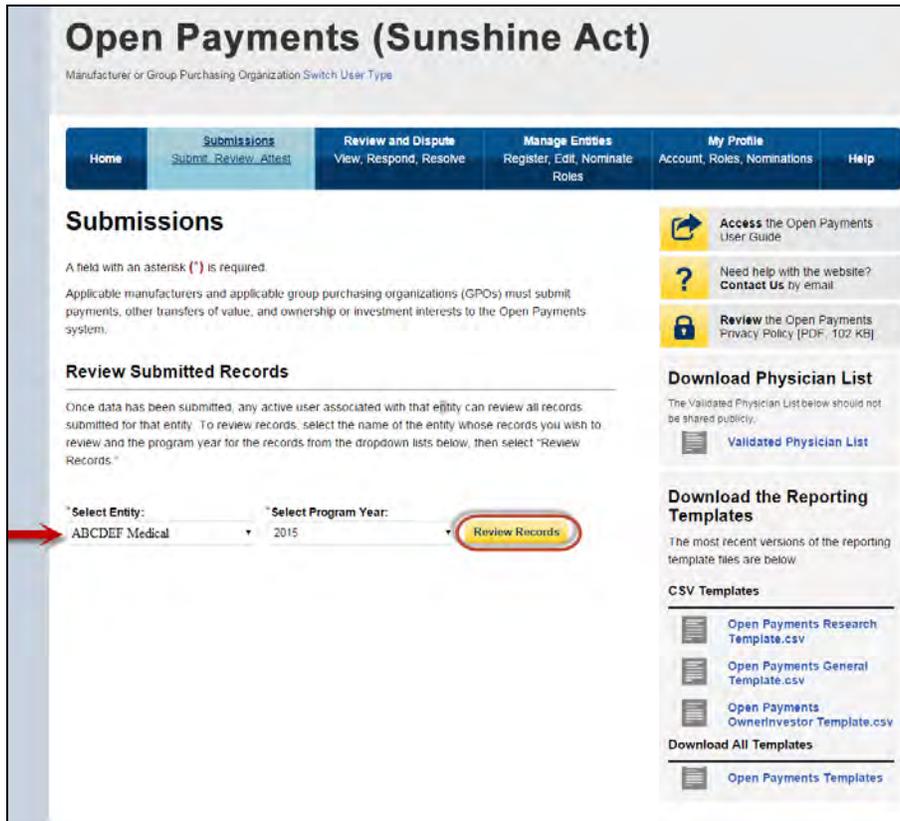
Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

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
- Review the Open Payments Privacy Policy [PDF, 102 KB]

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Step 2: Select the entity and program year from the drop-down lists and then select “Review Records.”



Step 3: Select “Begin Attestation of All Records.”

If the “Begin Attestation of All Records” button is not visible, check that there are records for that program year in “Ready for Attestation” or “Attested” status. If there are not, contact a submitter for the reporting entity and alert him or her that records need to be advanced to “Ready for Attestation” status (i.e., undergo final submission) before attestation can begin.

To view records in “Marked for Deletion” status, select “View All” next to the payment category for the records you wish to examine. On the following page, in the Record Status filter box, check the box for “Yes” under the heading “Marked for Deletion.” Select “Search.” Return to the “Review Records” page when you are ready to attest.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization [Switch User Type](#)

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Review and Dispute
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Manage Entities
Register, Edit, Nominate Roles
My Profile
Account, Roles, Nominations
Help

ABCDEF Medical 2015 - Review Records

Below are the records reported by the entity and categorized by the status for the selected program year. To edit records (available only for a user in a "submitter" role) or view the details of the reported records, select the "View All" button under a specific payment category (e.g., Research Payments, General Payments, etc.).

If all the records for the entity are in a "Ready for Attestation" or "Attested" status, a user in an "attester" role can attest by selecting the "Begin Attestation of All Records" button.

If you have further questions on how to make final submission of records, details on status definitions, or how to attest, use the link available on the right hand navigation.

Select "Notify Attester" to notify attesters that there are records that require re-attestation. All active attesters affiliated with the reporting entity will receive an email notification that there are records which require re-attestation. Records marked for deletion remain eligible for review, dispute, and publication, until re-attestation is complete.

Note: Previously attested records that have been marked for deletion have not yet been deleted from the Open Payments system. The attester must re-attest to all payments for the selected program year to complete the deletion. Records marked for deletion remain eligible for review, dispute, and publication, until re-attestation is complete.

Records counted as "Marked for Deletion" are also included in the "Attested" (†) record count.

[Back to Submissions](#)
[Begin Attestation of All Records](#)

Program Year: 2015

Research Payments [View All](#)

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	1	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	0	No Action
Failed Matching Validation	0	Correction
Total Payments	1	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

General Payments [View All](#)

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	1	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	0	No Action
Failed Matching Validation	0	Correction
Total Payments	1	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

Ownership or Investment Interest [View All](#)

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	1	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	0	No Action
Failed Matching Validation	0	Correction
Total Payments	1	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

Help with this Page

- [Record Status Definitions](#)
- [What do I do if records failed validation?](#)
- [How do I complete final submission?](#)
- [How do I complete attestation?](#)

Open Payments User Guide

Step 4: Review the payment information on this page.

The number of records marked for deletion (“Records Marked for Deletion”) and the total value of records marked for deletion (“Total Value of Records Marked for Deletion”) represent records that were previously attested and are now marked for deletion. These records will be removed from the Open Payments system after re-attestation is complete. Select “Go to Review Records” to view the detailed records being attested.

Select “Next” when you are ready to continue with the attestation process.

The screenshot displays the 'Open Payments (Sunshine Act)' web application interface. At the top, there is a navigation bar with tabs for Home, Submissions (Submit, Review, Attest), Review and Dispute (View, Respond, Resolve), Manage Entities (Register, Edit, Nominate Roles), My Profile (Account, Roles, Nominations), and Help. Below the navigation bar, the main content area is titled 'Confirm Payments'. A sidebar on the left lists steps: 1. Confirm Payments (highlighted), 2. Add Assumptions, 3. Agree to Attestations, and 4. Review and Attest. Below the sidebar are links for 'Access the Open Payments User Guide', 'Need help with the website? Contact Us by email', and 'Review the Open Payments Privacy Policy [PDF, 102 KB]'. The main content area contains instructions: 'Select "Go to Review Records" to review and confirm the submitted records, or select "Next" to move to the next page. Note that the number of records marked for deletion ("Records Marked for Deletion") and the total value of records marked for deletion ("Total Value of Records Marked for Deletion") represent records that were previously attested and are now marked for deletion. These records will be removed from the Open Payments system after re-attestation is complete.' Below this is a section for '2015 Program Year: ABCDEF Medical' with a table of statistics:

2015 Program Year: ABCDEF Medical	
Records Being Attested: 3 Records (transfers of value)	Total Value of Records Being Attested: \$9,000.00
Records Marked for Deletion: 0 Records	Total Value of Records Marked for Deletion: \$0.00

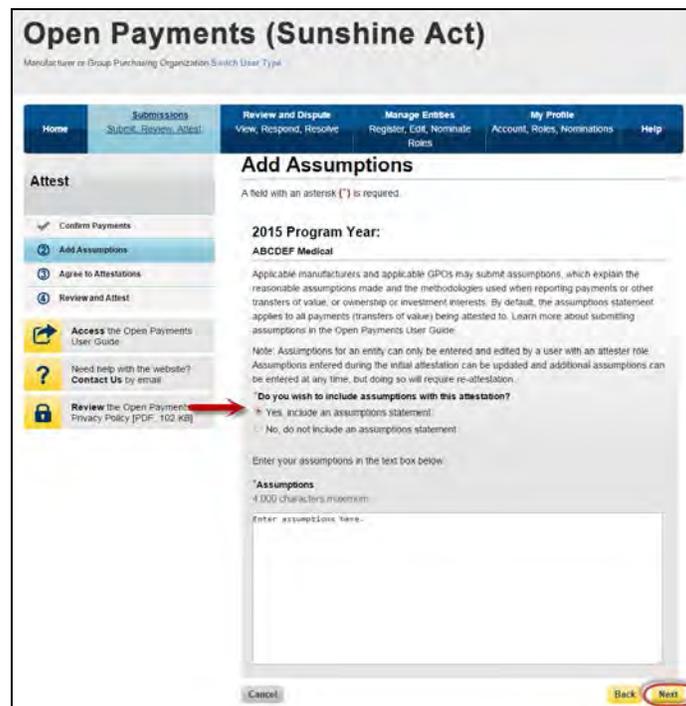
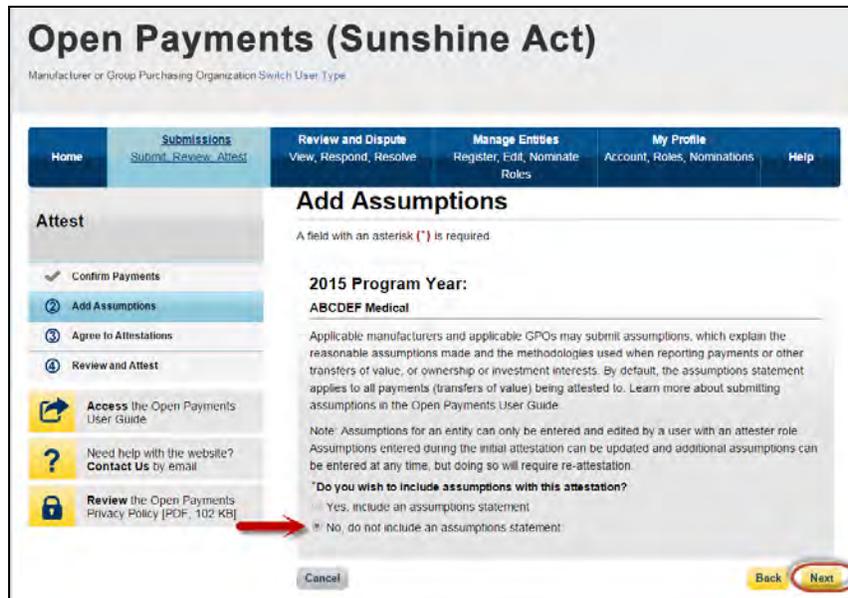
At the bottom of the main content area, there are two buttons: 'Go to Review Records' and 'Next' (circled in red). A 'Cancel' button is also visible at the bottom left of the main content area.

Open Payments User Guide

Step 5: Next, the option to add assumptions associated with these records is presented. Select “No” if no assumptions will be added. Select “Yes” if assumptions will be added. If you select “Yes,” a free-form text field will appear. If assumptions have previously been entered for these records Those assumptions will be in the text box and can be edited.

Type or paste your assumptions into this field, which has a 4,000-character limit. The text field allows all special characters found on a standard U.S. keyboard, not including ALT+NUMPAD ASCII Key characters. This text field can be edited later.

When you are done, select “Next.” Both options are displayed below.



Open Payments User Guide

Step 6: Read and agree to the attestations shown on the page below. You **must** agree to attestation statements 1 and 2 to complete the attestation process. Attestation statements 3 through 5 should be reviewed and selected only if they apply to your reporting entity and the payments being attested to. If you are attesting to the deletion of records, it is strongly encouraged you agree to statement 6. The text of these statements is provided earlier in this section. Once the appropriate attestations have been chosen, select “Continue.”

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Select User Type

Home Submissions (Sunshine, Review, Attest) Review and Dispute (View, Respond, Resolve) Manage Entities (Register, Edit, Nominate, Roles) My Profile (Account, Roles, Notifications) Help

Attest

- Confirm Payments
- Add Assumptions
- Agree to Attestations**
- Review and Attest

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy (PDF, 102 KB)

Agree to Attestations

A field with an asterisk (*) is required.

Please review the information entered and confirm your attestation statements by selecting the checkboxes next to each of the statements below. Note that the number of records marked for deletion ("Records Marked for Deletion") and the total value of records marked for deletion ("Total Value of Records Marked for Deletion") represent records that were previously attested and are now marked for deletion. These records will be removed from the Open Payments system after re-attestation is complete. When completed, select "Continue." Note: You must, at a minimum, select the first two checkboxes to proceed with the attestation process. To make corrections, select the "Back" button.

2015 Program Year: ABCDEF Medical	
Records Being Attested: 0 Records (Percent of Value)	Total Value of Records Being Attested: \$0.00
Records Marked for Deletion: 0 Records	Total Value of Records Marked for Deletion: \$0.00

Assumptions

View the Assumptions

Attestation Agreement

The section below contains the attestation statements presented in the Open Payments system. Applicable manufacturers and applicable GPOs are required to confirm the attestation statements shown below by selecting the checkboxes next to each of the applicable statements. The user must, at a minimum, select the checkboxes next to the first two statements to proceed with the attestation process.

Additionally, when an entity has deleted one or more records having been previously attested to, applicable manufacturers and applicable GPOs will be required to re-attest and confirm the attestation statements shown below by selecting the checkboxes next to each applicable statement. The user must, at a minimum, select the checkboxes next to the first two statements to proceed with the re-attestation process.

Please confirm your agreement to the statement(s) below:

- I attest that I am a Chief Executive Officer, Chief Financial Officer, Chief Compliance Officer, or other Officer for the reporting applicable manufacturer or applicable GPO with the authority to attest to the information submitted in the Open Payments system.
- I attest that the information reported is timely, accurate, and complete to the best of my knowledge and belief.
- I attest that my entity is only reporting payments or other transfers of value associated with covered drugs, devices, biologicals, or medical supplies based on one or more of the reasons listed below.
If yes to statement 3 above, indicate the reason by selecting at least one of the following reporting limitation statements:
 - My entity's gross revenue from covered drugs, devices, biologicals, or medical supplies constituted less than 1% percent of gross revenue during the fiscal year preceding the reporting year.
 - My entity is under common ownership, as defined by 42 C.F.R. § 403.502, with an applicable manufacturer and provides assistance or support to an applicable manufacturer with respect to the production, preparation, propagation, compounding, conversion, marketing, promotion, sale or distribution of a covered drug, device, biological, or medical supply. Therefore, my entity is only required to report payments or other transfers of value associated with covered drugs, devices, biologicals, or medical supplies which my entity provided assistance and support to an applicable manufacturer.
 - My entity has a separate operating division that does not manufacture any covered drugs, devices, biologicals, or medical supplies. Therefore, my entity is only required to report payments or other transfers of value to covered recipients related to the activities of this separate operating division. If such payments or other transfers of value are related to a covered drug, device, biological, or medical supply:
 - The only covered drug, device, biological, or medical supply manufactured by my entity is pursuant to a written agreement to manufacture a covered drug, device, biological, or medical supply for another entity. My entity does not hold the Food and Drug Administration approval, licensure, or clearance for the covered drug, device, biological, or medical supply, and is not involved in the sale, marketing, or distribution of the covered drug, device, biological, or medical supply. Therefore, my entity is only required to report payments or other transfers of value that are related to one or more covered drugs, devices, biologicals, or medical supplies.
 - My entity only manufactures covered drugs, devices, biologicals, or medical supplies.
- I attest that my entity is requesting a delay in publication for one or more payments or other transfers of value.
If yes to statement 4 above, indicate one or more of the reasons listed below:
 - The payment or other transfer of value is related to research or development of a new drug, device, biological, or medical supply.
 - The payment or other transfer of value is related to research or development of a new application of an existing drug, device, biological, or medical supply.
 - The payment or other transfer of value is related to clinical investigations regarding a new drug, device, biological, or medical supply.
- I attest that my entity is submitting a consolidated report because it is under common ownership, as defined by 42 C.F.R. § 403.502, with a separate entity or entities that are also applicable manufacturers.
- I am attesting to the action that my entity has deleted one or more records, which have been previously attested, and I am re-attesting that my entity's information reported is accurate and complete to the best of my knowledge and belief.

Submit

Cancel Back Continue

Open Payments User Guide

Step 7: Review the information entered on the previous pages. If the information is correct, select “Attest” to complete attestation.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Search User Type

Home | Submissions (Submit, Review, Attest) | Review and Dispute (View, Respond, Resolve) | Manage Entities (Register, Edit, Nominate, Roles) | My Profile (Account, Roles, Nominations) | Help

Attest

- Confirm Payments
- Add Assumptions
- Agree to Attestations
- Review and Attest**
- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy (PDF, 102 KB)

Review and Attest

Review the attestation agreement provided below. If you entered assumptions you may review them by selecting the "View the Assumptions" hyperlink. Note that the number of records marked for deletion ("Records Marked for Deletion") and the total value of records marked for deletion ("Total Value of Records Marked for Deletion") represent records that were previously attested and are now marked for deletion. These records will be removed from the Open Payments system after re-attestation is complete.

Select the "Attest" button to confirm your attestation. To make any changes, select the "Back" button.

2015 Program Year:
ABCDEF Medical

Records Being Attested: 3 Records (transfers of value)	Total Value of Records Being Attested: \$9,000.00
Records Marked for Deletion: 0 Records	Total Value of Records Marked for Deletion: \$0.00

[View the Assumptions](#)

Attestation Agreement

I attest that I am a Chief Executive Officer, Chief Financial Officer, Chief Compliance Officer, or other Officer for the reporting applicable manufacturer or applicable GPO with the authority to attest to the information submitted in the Open Payments system.

I attest that the information reported is timely, accurate, and complete to the best of my knowledge and belief.

Susan Jones
CEO
12/15/2015 9:25 AM

Cancel Back Attest

Open Payments User Guide

You will be brought back to the “Review Records” page. The record(s) attested to will appear in the “Attested” column. The Open Payments system will send an email to all attester(s) notifying them of the success of the attestation.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

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ABCDEF Medical 2015 - Review Records

Below are the records reported by the entity and categorized by the status for the selected program year. To edit records (available only for a user in a “submitter” role) or view the details of the reported records, select the “View All” button under a specific payment category (e.g., Research Payments, General Payments, etc.).

If all the records for the entity are in a “Ready for Attestation” or “Attested” status, a user in an “attester” role can attest by selecting the “Begin Attestation of All Records” button.

If you have further questions on how to make final submission of records, details on status definitions, or how to attest, use the link available on the right hand navigation.

Select “Notify Attester” to notify attesters that there are records that require re-attestation. All active attesters affiliated with the reporting entity will receive an email notification that there are records which require re-attestation. Records marked for deletion remain eligible for review, dispute, and publication, until re-attestation is complete.

Note: Previously attested records that have been marked for deletion have not yet been deleted from the Open Payments system. The attester must re-attest to all payments for the selected program year to complete the deletion. Records marked for deletion remain eligible for review, dispute, and publication, until re-attestation is complete.

Records counted as “Marked for Deletion” are also included in the “Attested” (†) record count.

[Back to Submissions](#)

[View Attestation](#)

Program Year: 2015

Research Payments [View All](#)

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	1	No Action
Failed Matching Validation	0	Correction
Total Payments	1	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

General Payments [View All](#)

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	1	No Action
Failed Matching Validation	0	Correction
Total Payments	1	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

Ownership or Investment Interest [View All](#)

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Return to Submitter	0	Correction
Attested †	1	No Action
Failed Matching Validation	0	Correction
Total Payments	1	

Marked for Deletion	Record Count	Action Required
† Attester to confirm deletion of previously Attested records	0	Attester to Attest deletion action or Reject Deletion

[Access the Open Payments User Guide](#)

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

[Review the Open Payments Privacy Policy \(PDF, 102 KB\)](#)

Help with this Page

[Record Status Definitions](#)

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[How do I complete final submission?](#)

[How do I complete attestation?](#)

Review and Dispute For Industry

Chapter 5: Review and Dispute for Applicable Manufacturers and Applicable GPOs

This chapter provides information on the review, dispute, and correction process for applicable manufacturers and applicable GPOs.

This chapter is divided into the following sections:

- **Review, Dispute, and Correction Overview** provides information on the review and dispute process within the Open Payments system.
- **Acknowledging Disputes and Resolving Disputes with No Change** provides information on how applicable manufacturers and applicable GPOs can acknowledge and resolve disputes initiated by physicians, teaching hospitals, and principal investigators. The “resolved, no change” action acknowledges that the applicable manufacturer or applicable GPO and the physician, teaching hospital, or principal investigator have resolved the dispute in accordance with the guidance in the Final Rule, and no changes to the data were needed.
- **Correction and Resolution of Disputed Data** provides information on how applicable manufacturers and applicable GPOs can make corrections to disputed data to resolve disputes.

Section 5.1: Review, Dispute, and Correction Overview

When an applicable manufacturer or applicable GPO has submitted records regarding payments, other transfers of value, or physician ownership or investment interests to the Open Payments system, the associated physicians, teaching hospitals, or principal investigators identified in the records have an opportunity to review those records. If a physician, teaching hospital, or principal investigator finds discrepancies with the submitted data, they can initiate a dispute. Applicable manufacturers and applicable GPOs can then work with physicians, teaching hospitals, or principal investigators to resolve the dispute.

Note: a principal investigator may only dispute his or her association with a research payment record and his or her own personal identifying information.

Dispute resolution takes place outside of the Open Payments system. Nevertheless, the status of the dispute resolution should be captured within the Open Payments system. **CMS will not mediate disputes between physicians, teaching hospitals, principal investigators, and reporting entities. Reporting entities should work with the disputing physician, teaching hospital, or principal**

Open Payments User Guide

investigator directly to resolve disputes. Only users who hold the role of submitter with the applicable manufacturer or applicable GPO will be able to perform activities related to review, dispute, and correction of record(s).

The process is outlined in **Figure 5.1**, below.

Figure 5.1: Review, Dispute, and Correction Process

Review Activities	Dispute Activities	Correction Activities
<ul style="list-style-type: none"> Physicians, teaching hospitals, and principal investigators may review data submitted about them before it is published. 	<ul style="list-style-type: none"> Physicians, teaching hospitals, and principal investigators dispute information reported about them or their institutions if they find inaccuracies. Principal investigators may only dispute their association with a research payment record and their personal identifying information – they may not dispute other information, such as the amount. 	<ul style="list-style-type: none"> Applicable manufacturers and applicable GPOs work with the disputing physician, teaching hospital, or principal investigator to correct disputed data, or agree that no change to data is necessary to resolve the dispute. Applicable manufacturers and applicable GPOs re-submit and attest to corrected records, if necessary.

5.1a: Review, Dispute and Correction Period

Each program year has a scheduled review, dispute, and correction period. This period begins with a 45-day period for physicians, teaching hospitals, and principal investigators to review, dispute, and work with the reporting entity to resolve the disputed record(s). Immediately following the initial 45-day period is an additional 15-day correction period for reporting entities to make final corrections to records and resolve any active disputes. Records that are flagged for delay in publication by the reporting entity are still eligible for review and dispute by physicians, teaching hospitals, and principal investigators.

Note that although there is a distinct review, dispute, and correction period, these activities can be performed throughout the year. The designated review and dispute period only affects when and how the dispute is displayed in the initial data publication and subsequent data refresh. For details on data publication, and how the timing of disputes and corrections impacts how the data is published, see Chapter 8.

If you cannot resolve a dispute with a physician, teaching hospital, or principal investigator within the 60 day review, dispute, and correction period for a program year, all parties should continue to seek a resolution until the dispute is resolved. Once the dispute is resolved and any necessary corrections are

Open Payments User Guide

made, the data will be updated in a subsequent publication based on when the corrections were made in the Open Payments system.

When a dispute resolution results in changes to or deletion of a record, applicable manufacturers and applicable GPOs must re-submit the record with the revisions to the Open Payments system. Then, the revised record must be re-attested to by the applicable manufacturer or applicable GPO to be considered fully submitted.

5.1b: Review and Dispute Statuses

Records in the review and dispute process will have one of the following review and dispute statuses:

- **Initiated:** Indicates that a physician, teaching hospital, or principal investigator has initiated a dispute against a record submitted by an applicable manufacturer or applicable GPO.
- **Acknowledged:** Indicates that an applicable manufacturer or applicable GPO has received and acknowledged a dispute initiated against them by a physician, teaching hospital, or principal investigator.
- **Resolved, No Change:** Indicates that the applicable manufacturer or applicable GPO and the physician, teaching hospital, or principal investigator have resolved the dispute in accordance with the guidance in the Final Rule and no changes were made to the disputed record.
- **Withdrawn:** Indicates that a physician, teaching hospital, or principal investigator has withdrawn a dispute they initiated against a record submitted by an applicable manufacturer or applicable GPO.
- **Resolved:** Indicates that disputed data was corrected and then re-submitted and re-attested to by the applicable manufacturer or applicable GPO.

This chapter explains how applicable manufacturers and applicable GPOs acknowledge, resolve with no change, and resolve disputes with corrections in the Open Payments system. Chapter Nine, “Review and Dispute for Physicians, Teaching Hospitals, and Principal Investigators,” explains how physicians, teaching hospitals, and principal investigators initiate and withdraw disputes.

Email notifications are sent to alert applicable manufacturers, applicable GPOs, physicians, teaching hospitals, and principal investigators of review and dispute activities in the Open Payments system. These emails contain only the information necessary to locate the record in the Open Payments system and do not contain contact information for any of the parties involved in the dispute. Users will need to access the dispute in the system to determine the dispute details. The Reporting Entity Contact Information for disputes included in your entity’s profile is available on the “Record ID” page of each individual record.

5.1c: Exporting Disputed Data

The Open Payments system now allows users to download disputed data into a separate CSV file. Records are exported into a pipe (“|”) delimited CSV file by selecting the link labeled "Download

Open Payments User Guide

Disputes” from your entity’s “Review and Dispute” page. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table and other data elements related to the dispute. Downloaded data files cannot exceed the acceptable record limit (approximately 400,000 records). To download more than the acceptable record limit, apply filtering criteria to create smaller subsets of records and download them in multiple files.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

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Review and Dispute - ABCDEF Medical - 2015

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The table below contains the record(s) that have been disputed by physicians, teaching hospitals, or principal investigators. Users with the role of submitter for this reporting entity can take actions related to the dispute or edit the record(s) that are disputed. Once the disputed record is edited and re-attested, the associated dispute(s) on the record will move into “Resolved” status.

Please note: To view the entire table, use the horizontal scroll bar below the table. Use the filtering tools below to customize your view of the disputed records.

You may export your search results into a CSV file by selecting the link labeled “Download Disputes Zip File.” Only one CSV file will be generated containing all three payment categories. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. If you attempt to download a file that exceeds the system limit (approximately 400,000 records), you will receive an on-screen error notification. To correct this error, adjust the filtering criteria to create smaller subsets of records and download them in multiple files. To view all fields for a record, select the “Record ID” hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Record ID column:

- Select “Acknowledge Dispute” to confirm that the reporting entity received the disputed record(s).
- Select “Edit” in the table below (use the scroll bar to see the “Action” column at the end of the table, and the “Edit” option) to edit the record details of the disputed record. Depending on the record status, it may not be editable.
- Select “Resolved No Change” to acknowledge that the reporting entity and the physician, teaching hospital, or principal investigator have resolved the dispute in accordance with the guidance in the Final Rule. This action should only be taken when dispute resolution does not require a change to the data by the reporting entity.

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

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

Applicable Manufacturer or Applicable GPO's Disputed Records

Dispute ID:
Maximum 38 digits

Record ID:
Maximum 38 digits

Home System Payment ID:

File ID:
Maximum 38 digits

Physician First Name:

Physician Last Name:

Teaching Hospital Name:
Please Select

Review and Dispute Status:

 Initiated
 Acknowledged
 Resolved No Change
 Withdrawn
 Resolved

Marked for Deletion:

 Yes
 No

Payment Category:

 General Payments
 Research Payments
 Ownership or Investment Interest

Recipient Type:

 Physician
 Teaching Hospital

[Download Disputes Zip File](#) [Search](#) [Clear All](#)

Showing Results for: [All]

Show Entries 10 [Acknowledge Dispute](#) [Resolved No Change](#)

Select	Record ID	Dispute ID	Home System Payment ID	File ID	Amount (\$)	Date of Payment	Recipient	Delay in Publication of Research Payment Indicator	Date Dispute Initiated	Dispute Last Modified By	Record Status
<input checked="" type="checkbox"/>	818881	231			\$8.03	2013-06-01	John Miller	No	2011-09-30	Tom Smith	Attested

Page 1 of 1 1 Go

Section 5.2: Acknowledging Disputes and Resolving Disputes with No Change

Applicable manufacturers and applicable GPOs have the option to acknowledge disputes initiated by physicians, teaching hospitals, and principal investigators. This status does not indicate agreement or acceptance of the dispute by the reporting entity and is only meant to serve as a notification to the physician, teaching hospital, or principal investigator that the dispute has been received by the reporting entity.

When the dispute status is changed to “Acknowledged” or “Resolved, No Change,” the physician, teaching hospital, or principal investigator will receive an email notification of the status update. This email notification may help reduce the chance of a physician, teaching hospital, or principal investigator disputing a record multiple times, as they will receive notification that the dispute review process is underway.

When a record undergoes revision to address a dispute, that record will not be visible to the physician, teaching hospital, or principal investigators identified in it, until the record is re-attested. (Note that this does not occur on records whose disputes were resolved without changes to the data.) The record will return to the view of the physician, teaching hospital, or principal investigators only after the record regains “attested” status. The acknowledgement email can serve as a receipt, confirming to the physician, teaching hospital, or principal investigator that the record exists and the dispute received.

The five steps of the process are given in **Figure 5.2** below.

Figure 5.2: Acknowledging Disputes and Resolving Disputes with No Change Process



The specific steps to acknowledge a dispute and to set a disputed record to the status of “Resolved, No Change,” are given below.

Open Payments User Guide

5.2a: Acknowledging a Dispute

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials, navigate to the Open Payments home page, and select the “Review and Dispute” tab on the menu bar.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home **Submissions** (Submit, Review, Attest) **Review and Dispute** (View, Respond, Resolve) **Manage Entities** (Register, Edit, Nominate Roles) **My Profile** (Account, Roles, Nominations) **Help**

Welcome to the Open Payments System

Announcements

2015 Program Year General information - The program year 2015 data submission period is now open. Reporting entities may begin submitting and attesting to their data.

Reporting entities registered in a prior program year must be re-certified before any system-related actions can be performed. Review and dispute point of contact information must be provided to complete re-certification. For information on how to re-certify, refer to the quick reference guide "Applicable Manufacturer and Applicable GPO Registration and Re-Certification," located on the Resources page of the Open Payments website.

Review and dispute functionality in the Open Payments system is unavailable until April 2016.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

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
- Review** the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: Select the reporting entity name and the program year from the drop-down menus. When finished, select “Show Disputes.” This will show you a list of all disputes for the selected entity in that program year.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home **Submissions** (Submit, Review, Attest) **Review and Dispute** (View, Respond, Resolve) **Manage Entities** (Register, Edit, Nominate, Roles) **My Profile** (Account, Roles, Nominations) **Help**

Review and Dispute Overview

A field with an asterisk (*) is required.

Applicable Manufacturer or Applicable GPO Records

Select a reporting entity and program year from the drop-down list below, then select "Show Disputes." This will display records relating to payments or other transfers of value, or ownership or investment interests for the selected reporting entity and program year that are disputed.

The review and dispute process begins with an initial 45-day period for physicians, teaching hospitals, and principal investigators to review and dispute their data, followed by a 15-day correction period for reporting entities to resolve disputes and make necessary corrections to the data prior to publication.

Physicians, teaching hospitals, and principal investigators may initiate disputes with reporting entities from the start of the review and dispute period until the end of that calendar year.

If any disputes are initiated for the first time after the 45-day review and dispute period and not resolved within the 15-day correction period, the record will be published as not disputed in the initial annual data publication for that year.

If any dispute results in a change to the covered recipient or principal investigator information, the original record must be deleted and a new record submitted with the updated covered recipient information.

Only records for which attestation was completed by the submission deadline of that calendar year will be eligible for the review and dispute process for that calendar year.

For a complete list of review and dispute rules, refer to the User Guide located under "Resources" in the CMS Open Payments website.

*Show Disputes for:
ABCDEF Medical

*Program Year:
2015

Show Disputes

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 3: On the Review and Dispute page, you will see a list of all data disputes that were initiated by physicians, teaching hospitals, and principal investigators.

If you wish, you may filter the records by using the search criteria options that are shown. You do not need to filter the results in order to proceed. For instructions on how to export this data, see Section 5.1c. To view all fields for an individual record, select the "Record ID" hyperlink in the record's row in the table. To view details about a disputed record, scroll to the right of the table using the scroll bar and select "View" under the "Action" column. Review the information on the Record ID page. When finished, select "Back."

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Selected User Type

Home | Submissions (Submit, Review, Alerts) | **Review and Dispute** (View, Respond, Resolve) | Manage Entities (Register, Edit, Nominate, Roles) | My Profile (Account, Roles, Nominations) | Help

Record ID: 618881

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Record Details

Program Year: 2015 | Last Modified Date: 2015-12-06
Payment Submitting Entity: ABCDEF Medical | Last Modified By: Tom Smith
Payment Category: Ownership or Investment Interest | Submission Date: 2015-12-06
Consolidated Reporting: No | Submitted By: Tom Smith
Home System Payment ID: | Record Status: Ready for Submission
Marked for Deletion: No
Associated Disputes and Statuses:

Physician Demographic Information

Physician's First Name: John
Physician Middle Name:
Physician Last Name: Miller
Physician Name Suffix:
Physician Business Street Address, Line 1: 7500 Security Blvd
Physician Business Street Address, Line 2:
Physician City: Baltimore
Physician State: Maryland
Physician Zip Code: 21244
Physician Country: United States
Physician Province:
Physician Postal Code:
Physician Email Address:
Physician Primary Type: Medical Doctor
Physician NPI: 1234567890
Physician Taxonomy Code: 207N0002X
Physician License State: Maryland
Physician License Number: 1234567890
Physician License State:
Physician License Number:
Physician License State:
Physician License Number:
Physician License State:
Physician License Number:
Physician License State:
Physician License Number:

Ownership or Investment Information

Applicable Manufacturer or Applicable GPO Reporting Ownership Name: ABCDEF Medical
Applicable Manufacturer or Applicable GPO Reporting Ownership Registration ID: 100000205014
Interest Held By: Physician Covered Recipient
Dollar Amount Invested: \$9.03
Value of Interest: \$9.03
Terms of Interest: 10%

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Access the Open Payments User Guide
Need help with the website? Contact Us by email
Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 4: Select the checkboxes next to the disputed record(s) you wish to acknowledge. Once you have selected the appropriate record(s), select “Acknowledge Dispute.” You may only acknowledge disputes with a review and dispute status of “Initiated.”

If you wish to view the detailed history for a record’s dispute, scroll to the right and select “View” under the “History of Disputes” column. This will display the History of Disputes page for that record, which displays information for the record and any comments regarding the dispute entered by the disputing physician, teaching hospital, or principal investigator.

Open Payments (Sunshine Act)
 Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home | Submissions (Submit, Review, Attest) | **Review and Dispute (View, Respond, Resolve)** | Manage Entities (Register, Edit, Nominate, Roles) | My Profile (Account, Roles, Nominations) | Help

Review and Dispute - ABCDEF Medical - 2015

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The table below contains the record(s) that have been disputed by physicians, teaching hospitals, or principal investigators. Users with the role of submitter for this reporting entity can take actions related to the dispute or edit the record(s) that are disputed. Once the disputed record is edited and re-attested, the associated dispute(s) on the record will move into “Resolved” status.

Please note: To view the entire table, use the horizontal scroll bar below the table. Use the filtering tools below to customize your view of the disputed records.

You may export your search results into a CSV file by selecting the link labeled “Download Disputes Zip File.” Only one CSV file will be generated containing all three payment categories. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. If you attempt to download a file that exceeds the system limit (approximately 400,000 records), you will receive an on-screen error notification. To correct this error, adjust the filtering criteria to create smaller subsets of records and download them in multiple files. To view all fields for a record, select the “Record ID” hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Record ID column:

- Select “Acknowledge Dispute” to confirm that the reporting entity received the disputed record(s).
- Select “Edit” in the table below (use the scroll bar to see the “Action” column at the end of the table, and the “Edit” option) to edit the record details of the disputed record. Depending on the record status, it may not be editable.
- Select “Resolved No Change” to acknowledge that the reporting entity and the physician, teaching hospital, or principal investigator have resolved the dispute in accordance with the guidance in the Final Rule. This action should only be taken when dispute resolution does not require a change to the data by the reporting entity.

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

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

Applicable Manufacturer or Applicable GPO's Disputed Records

Dispute ID: (Maximum 38 digits) | Record ID: (Maximum 38 digits) | Home System Payment ID: | File ID: (Maximum 38 digits)

Physician First Name: | Physician Last Name: | Teaching Hospital Name: (Please Select)

Review and Dispute Status: Initiated, Acknowledged, Resolved No Change, Withdrawn, Resolved

Marked for Deletion: Yes, No

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

Recipient Type: Physician, Teaching Hospital

[Download Disputes Zip File](#) | [Search](#) | [Clear All](#)

Showing Results for: [All]

Show Entries: 10

[Acknowledge Dispute](#) | [Resolved No Change](#)

Select All	Record ID	Dispute ID	Home System Payment ID	File ID	Amount (\$)	Date of Payment	Recipient	Delay in Publication of Research Payment Indicator	Date Dispute Initiated	Dispute Last Modified By	Record Status
<input checked="" type="checkbox"/>	618861	231			\$9.03	2013-08-01	John Miller	No	2015-09-30	Tom Smith	Attested

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Open Payments User Guide

Step 5: Review the disputed record information as displayed on the Acknowledge Dispute page. When finished, select "Acknowledge."

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization [Switch User Type](#)

- Home
- Submissions
Submit, Review, Attest
- Review and Dispute**
[View](#), [Respond](#), [Resolve](#)
- Manage Entities
Register, Edit, Nominate
Roles
- My Profile
Account, Roles, Nominations
- Help

Acknowledge Dispute

ABCDEF Medical - 2015

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Select the "Acknowledge" button to acknowledge the disputed records initiated by the physician or teaching hospital. Once the dispute is acknowledged, the Review and Dispute status for the record will be displayed as "Acknowledged".

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

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

Acknowledge the following disputes:

Dispute ID	Record ID	Date of Payment	Amount (\$)	Covered Recipient	Review and Dispute Status	Record Status	Date Dispute Initiated
231	618881	2013-08-01	\$9.03	John Miller	Initiated	Attested	2015-09-30

[Cancel](#) [Acknowledge](#)

Open Payments User Guide

The following confirmation message will be displayed. An email notification will be sent to the covered recipient informing them that their dispute has been acknowledged.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

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Submissions
Submit, Review, Attest

Review and Dispute
View, Respond, Resolve

Manage Entities
Register, Edit, Nominate
Roles

My Profile
Account, Roles, Nominations

Help

Review and Dispute - ABCDEF Medical - 2015

You have successfully acknowledged the following dispute(s):

Record Id	Dispute Id
618881	231

An email has been sent to notify the covered recipient.

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The table below contains the record(s) that have been disputed by physicians, teaching hospitals, or principal investigators. Users with the role of submitter for this reporting entity can take actions related to the dispute or edit the record(s) that are disputed. Once the disputed record is edited and re-attested, the associated dispute(s) on the record will move into "Resolved" status.

Please note: To view the entire table, use the horizontal scroll bar below the table. Use the filtering tools below to customize your view of the disputed records.

You may export your search results into a CSV file by selecting the link labeled "Download Disputes Zip File." Only one CSV file will be generated containing all three payment categories. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. If you attempt to download a file that exceeds the system limit (approximately 400,000 records), you will receive an on-screen error notification. To correct this error, adjust the filtering criteria to create smaller subsets of records and download them in multiple files. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Record ID column:

- Select "Acknowledge Dispute" to confirm that the reporting entity received the disputed record(s).
- Select "Edit" in the table below (use the scroll bar to see the "Action" column at the end of the table, and the "Edit" option) to edit the record details of the disputed record. Depending on the record status, it may not be editable.
- Select "Resolved No Change" to acknowledge that the reporting entity and the physician, teaching hospital, or principal investigator have resolved the dispute in accordance with the guidance in the Final Rule. This action should only be taken when dispute resolution does not require a change to the data by the reporting entity.

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

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

Applicable Manufacturer or Applicable GPO's Disputed Records

Dispute ID:
Maximum 38 digits

Record ID:
Maximum 38 digits

Home System Payment ID:

File ID:
Maximum 38 digits

Physician First Name:

Physician Last Name:

Teaching Hospital Name:

Review and Dispute Status:

Marked for Deletion:

 Yes
 No

Payment Category:

 General Payments
 Research Payments
 Ownership or Investment Interest

Recipient Type:

 Physician
 Teaching Hospital

[Download Disputes Zip File](#)
[Search](#)
[Clear All](#)

Showing Results for: [All]

Show Entries: [Acknowledge Dispute](#) [Resolved No Change](#)

Select	Record ID	Dispute ID	Home System Payment ID	File ID	Amount (\$)	Date of Payment	Recipient	Delay in Publication of Research Payment Indicator	Date Dispute Initiated	Dispute Last Modified By	Record Status
<input type="checkbox"/>	618881	231			\$9.03	2013-08-01	John Miller	No	2015-09-30	Tom Smith	Attested

1 [Go](#)

Open Payments User Guide

5.2b: Resolved, No Change Disputes

The “Resolved, No Change” status means that the applicable manufacturer or applicable GPO and the physician, teaching hospital, or principal investigator have resolved the dispute in accordance with the guidance in the Final Rule, and the record in the Open Payments system does not require correction.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page, and select the “Review and Dispute” tab on the menu bar.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home **Submissions** (Submit, Review, Attest) **Review and Dispute** (View, Respond, Resolve) **Manage Entities** (Register, Edit, Nominate Roles) **My Profile** (Account, Roles, Nominations) **Help**

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - The program year 2015 data submission period is now open. Reporting entities may begin submitting and attesting to their data.

Reporting entities registered in a prior program year must be re-certified before any system-related actions can be performed. Review and dispute point of contact information must be provided to complete re-certification. For information on how to re-certify, refer to the quick reference guide "Applicable Manufacturer and Applicable GPO Registration and Re-Certification," located on the Resources page of the Open Payments website.

Review and dispute functionality in the Open Payments system is unavailable until April 2016.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

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

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- Need help with the website? Contact Us** by email
- Review** the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: Select the reporting entity name and the program year from the drop-down menus. When finished, select “Show Disputes.” This will show you a list of all disputes for the selected entity in that program year.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home Submissions (Submit, Review, Attest) **Review and Dispute** (View, Respond, Resolve) Manage Entities (Register, Edit, Nominate, Roles) My Profile (Account, Roles, Nominations) Help

Review and Dispute Overview

A field with an asterisk (*) is required.

Applicable Manufacturer or Applicable GPO Records

Select a reporting entity and program year from the drop-down list below, then select “Show Disputes.” This will display records relating to payments or other transfers of value, or ownership or investment interests for the selected reporting entity and program year that are disputed.

The review and dispute process begins with an initial 45-day period for physicians, teaching hospitals, and principal investigators to review and dispute their data, followed by a 15-day correction period for reporting entities to resolve disputes and make necessary corrections to the data prior to publication.

Physicians, teaching hospitals, and principal investigators may initiate disputes with reporting entities from the start of the review and dispute period until the end of that calendar year.

If any disputes are initiated for the first time after the 45-day review and dispute period and not resolved within the 15-day correction period, the record will be published as not disputed in the initial annual data publication for that year.

If any dispute results in a change to the covered recipient or principal investigator information, the original record must be deleted and a new record submitted with the updated covered recipient information.

Only records for which attestation was completed by the submission deadline of that calendar year will be eligible for the review and dispute process for that calendar year.

For a complete list of review and dispute rules, refer to the User Guide located under “Resources” in the [CMS Open Payments](#) website.

*Show Disputes for:
ABCDEF Medical

*Program Year:
2015

Show Disputes

Access the Open Payments User Guide
Need help with the website? Contact Us by email
Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 3: On the Review and Dispute page, you will see a list of all data disputes that were initiated by physicians, teaching hospitals, and principal investigators. If you wish, you may filter the records by using the search criteria options that are shown. You do not need to filter the results to proceed. For instructions on how to export this data, see Section 5.1c.

To view all fields for an individual record, select the "Record ID" hyperlink in the record's row in the table. To view details about a disputed record, scroll to the right of the table using the bottom scroll bar and select "View" under the "Action" column.

Select the checkboxes next to the disputed record(s) you wish to resolve with no changes. Once you have selected the appropriate record(s), select "Resolved, No Change."

You may only resolve disputes with no changes if you and the disputing physician, teaching hospital, or principal investigator have resolved the dispute in accordance with the guidance in the Final Rule.

If you wish to view the detailed history for a record's dispute, scroll to the right and select "View" under the "History of Disputes" column. This will display the History of Disputes page for that record, which shows information for the record and any comments regarding the dispute entered by the disputing physician, teaching hospital, or principal investigator.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

Home	Submissions Submit, Review, Attest	Review and Dispute View , Respond , Resolve	Manage Entities Register, Edit, Nominate Roles	My Profile Account, Roles, Nominations	Help
-------------	----------------------------------------------	-------------------------------------------------------------------------------------------------------	-------------------------------------------------------------	--------------------------------------------------	-------------

Review and Dispute - ABCDEF Medical - 2015

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The table below contains the record(s) that have been disputed by physicians, teaching hospitals, or principal investigators. Users with the role of submitter for this reporting entity can take actions related to the dispute or edit the record(s) that are disputed. Once the disputed record is edited and re-attested, the associated dispute(s) on the record will move into "Resolved" status.

Please note: To view the entire table, use the horizontal scroll bar below the table. Use the filtering tools below to customize your view of the disputed records.

You may export your search results into a CSV file by selecting the link labeled "Download Disputes Zip File." Only one CSV file will be generated containing all three payment categories. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. If you attempt to download a file that exceeds the system limit (approximately 400,000 records), you will receive an on-screen error notification. To correct this error, adjust the filtering criteria to create smaller subsets of records and download them in multiple files. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Record ID column:

- Select "Acknowledge Dispute" to confirm that the reporting entity received the disputed record(s).
- Select "Edit" in the table below (use the scroll bar to see the "Action" column at the end of the table, and the "Edit" option) to edit the record details of the disputed record. Depending on the record status, it may not be editable.
- Select "Resolved No Change" to acknowledge that the reporting entity and the physician, teaching hospital, or principal investigator have resolved the dispute in accordance with the guidance in the Final Rule. This action should only be taken when dispute resolution does not require a change to the data by the reporting entity.

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

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

Applicable Manufacturer or Applicable GPO's Disputed Records

Dispute ID: Maximum 38 digits	Record ID: Maximum 38 digits	Home System Payment ID:	File ID: Maximum 38 digits
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Physician First Name:	Physician Last Name:	Teaching Hospital Name:	
<input type="text"/>	<input type="text"/>	Please Select <input type="text"/>	
Review and Dispute Status:	Marked for Deletion:	Payment Category:	Recipient Type:
<input type="checkbox"/> Initiated <input type="checkbox"/> Acknowledged <input type="checkbox"/> Resolved No Change <input type="checkbox"/> Withdrawn <input type="checkbox"/> Resolved	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> General Payments <input type="checkbox"/> Research Payments <input type="checkbox"/> Ownership or Investment Interest	<input type="checkbox"/> Physician <input type="checkbox"/> Teaching Hospital
Download Disputes Zip File Search Clear All			

Showing Results for: [All]

Show Entries 10

[Acknowledge Dispute](#) [Resolved No Change](#)

Select	Record ID	Dispute ID	Home System Payment ID	File ID	Amount (\$)	Date of Payment	Recipient	Delay in Publication of Research Payment Indicator	Date Dispute Initiated	Dispute Last Modified By	Record Status
<input checked="" type="checkbox"/>	618881	231			\$9.03	2013-08-01	John Miller	No	2015-09-30	Tom Smith	Attested

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Open Payments User Guide

Step 4: Review the disputed record information as displayed on the “Resolved, No Change” page. In the text box, you must enter the reason the dispute was resolved without changes made to the data. The text box can contain up to 4,000 characters, including spaces. All special characters found on a standard U.S. keyboard can be used, not including ALT+NUMPAD ASCII Key characters.

An email notification will be sent to the physician, teaching hospital, or principal investigator informing them that their dispute has been resolved with no changes made to the data. The email will include the explanation provided in the “Reason for dispute resolution with no change to the data” box. If disputes on multiple records are resolved without changes in the same action (e.g., multiple records are selected and then the “Resolved No Change” button is selected), the explanation provided in the “Reason for dispute resolution with no change to the data” text will be sent to all of the covered recipients included in the disputes marked as “Resolved No Change.”

If the reasons for dispute resolution vary for each record disputed, perform the actions above separately for each dispute to ensure the correct reasons are provided to the correct disputing physicians, teaching hospitals, or principal investigators; otherwise, a covered recipient may see an explanation that was meant for a different covered recipient.

When you have entered in the information you wish to include in the text box, select “Resolved No Change.”

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

Home	Submissions Submit, Review, Attest	Review and Dispute View, Respond, Resolve	Manage Entities Register, Edit, Nominate Roles	My Profile Account, Roles, Nominations	Help
-------------	----------------------------------------------	-----------------------------------------------------	-------------------------------------------------------------	--------------------------------------------------	-------------

Resolved No Change

A field with an asterisk (*) is required.

ABCDEF Medical - 2015

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A reporting entity should select **"Resolved No Change"** to acknowledge that the reporting entity and the physician, teaching hospital, or principal investigator have resolved the dispute in accordance with the guidance in the Final Rule. **This action should only be taken when dispute resolution does not require a change to the data by the reporting entity.**

In the free-form text box below, enter the reason(s) why the dispute has been resolved with no changes to the data. The text box can contain up to 4,000 characters, including spaces.

For example, the explanation for a dispute that has been resolved with no change to the data could say: "This dispute is resolved with no changes made to the data because there is now agreement relating to the reported payment amount. The physician was able to verify that the payment amount of "six thousand and five hundred dollars" dollars is correct. Therefore, we are moving forward with resolving the dispute without changing the data." After entering reasons into the text box, select "Resolved No Change".

Note that the contents of the "Reason for dispute resolution with no change to the data" box will be sent in an email to the physician, teaching hospital, or principal investigator who disputed the record(s).

As a result, it is strongly recommended that the user selecting "Resolved No Change" refrain from making that selection across multiple covered recipients at the same time. The same text used in the "Reason for dispute resolution with no change to the data" box will be sent to all of the physicians, teaching hospitals, or principal investigators whose disputes were assigned "Resolved No Change" status at that time. If you have multiple covered recipients, it is recommended that you repeat the "Resolved No Change" process for each individual covered recipient.

Once the action is confirmed by the selection of "Resolved No Change," the status of the dispute status will be displayed as "Resolved No Change."

To return to the previous page, select "Cancel." Open Payments User Guide.

Resolve the following disputes with no changes to the data:

Dispute ID	Record ID	Date of Payment	Amount (\$)	Recipient	Review and Dispute Status	Record Status	Dispute Date Initiated
231	618881	2013-08-01	\$9.03	John Miller	Acknowledged	Attested	2015-09-30

*Reason for dispute resolution with no change to the data

4,000 characters maximum

Enter reason for dispute resolution with no change to the data.

[Cancel](#)

[Resolved No Change](#)

Open Payments User Guide

The following confirmation message will be displayed on the page.

Note that the physician, teaching hospital, or principal investigator may initiate a new dispute for the same record if the dispute has not been resolved to their satisfaction.

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

Home
Submissions
Submit, Review, Attest
Review and Dispute
View, Respond, Resolve
Manage Entities
Register, Edit, Normalize
Roles
My Profile
Account, Roles, Nominations
Help

Review and Dispute - ABCDEF Medical - 2015

You have successfully resolved with no change to the data the following dispute(s):

Record ID	Dispute ID
618881	231

An email has been sent to notify the covered recipient

[Back](#)

The table below contains the record(s) that have been disputed by physicians, teaching hospitals, or principal investigators. Users with the role of submitter for this reporting entity can take actions related to the dispute or edit the record(s) that are disputed. Once the disputed record is edited and re-attested, the associated dispute(s) on the record will move into "Resolved" status.

Please note: To view the entire table, use the horizontal scroll bar below the table. Use the filtering tools below to customize your view of the disputed records.

You may export your search results into a CSV file by selecting the link labeled "Download Disputes Zip File." Only one CSV file will be generated containing all three payment categories. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. If you attempt to download a file that exceeds the system limit (approximately 400,000 records), you will receive an on-screen error notification. To correct this error, adjust the filtering criteria to create smaller subsets of records and download them in multiple files. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Record ID column.

- Select "Acknowledge Dispute" to confirm that the reporting entity received the disputed record(s).
- Select "Edit" in the table below (use the scroll bar to see the "Action" column at the end of the table, and the "Edit" option) to edit the record details of the disputed record. Depending on the record status, it may not be editable.
- Select "Resolved No Change" to acknowledge that the reporting entity, and the physician, teaching hospital, or principal investigator have resolved the dispute in accordance with the guidance in the Final Rule. This action should only be taken when dispute resolution does not require a change to the data by the reporting entity.

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

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

Applicable Manufacturer or Applicable GPO's Disputed Records

Dispute ID:
Maximum 38 digits

Record ID:
Maximum 38 digits

Home System Payment ID:

File ID:
Maximum 38 digits

Physician First Name:

Physician Last Name:

Teaching Hospital Name:

Please Select

Review and Dispute Status:

Initiated
 Acknowledged
 Resolved No Change
 Withdrawn
 Resolved

Marked for Deletion:

 Yes
 No

Payment Category:

 General Payments
 Research Payments
 Ownership or Investment Interest

Recipient Type:

 Physician
 Teaching Hospital

[Download Disputes Zip File](#)
[Search](#)
[Clear All](#)

Showing Results for: [All]

Show Entries: 10
Acknowledge Dispute
Resolved No Change

Select All	Record ID	Dispute ID	Home System Payment ID	File ID	Amount (\$)	Date of Payment	Recipient	Delay in Publication of Research Payment Indicator	Date Dispute Initiated	Dispute Last Modified By	Record Status
1	618881	231			89.01	2013-08-01	John Miller	No	2015-09-30	Tom Smith	Attested

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1 Go

Section 5.3: Correction, Resolution, and Deletion of Submitted Payment Data

Once a dispute is initiated by a physician, teaching hospital, or principal investigator, the reporting entity should work directly with the physician, teaching hospital, or principal investigator to correct the disputed data. CMS will not mediate disputes between physicians, teaching hospitals, principal investigators, and reporting entities.

If a correction to a record is needed to resolve a dispute, the corrected record must be re-submitted and then re-attested to. If the re-submission is made via bulk file upload, the “Record ID” for the record(s) must be included in the re-submission. If the re-submission is made manually, the record(s) should be located in the Open Payments system and edited using the edit function. See Section 5.3a below for more information.

After re-attestation to the corrected records is complete, the physician, teaching hospital, or principal investigator will receive an email notification that the record(s) has been edited and the dispute resolved.

The five steps of the correction and resolution process are given in **Figure 5.3** below.

Figure 5.3: Correction and Resolution Process



Note: If the dispute resolution changes any of the fields that identify the covered recipient, the original record must be deleted and resubmitted as a new record.

- For physicians (including principal investigators), these identifying fields are First Name, Last Name, NPI, License State, and License Number.
- For teaching hospitals, these identifying fields are Teaching Hospital Name, the hospital address fields, and Taxpayer Identification Number.

Deletion and resubmission may affect the publication timing of the record. Refer to Chapter 8 for publication rules.

Open Payments User Guide

5.3a: Edit Information and Resubmit Record

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials, navigate to the Open Payments home page, and select the “Review and Dispute” tab on the menu bar.

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home Submissions (Submit, Review, Attest) **Review and Dispute (View, Respond, Resolve)** Manage Entities (Register, Edit, Nominate, Roles) My Profile (Account, Roles, Nominations) Help

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - The program year 2015 data submission period is now open. Reporting entities may begin submitting and attesting to their data.

Reporting entities registered in a prior program year must be re-certified before any system-related actions can be performed. Review and dispute point of contact information must be provided to complete re-certification. For information on how to re-certify, refer to the quick reference guide "Applicable Manufacturer and Applicable GPO Registration and Re-Certification," located on the Resources page of the Open Payments website.

Review and dispute functionality in the Open Payments system is unavailable until April 2016.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

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](#)

[Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)

Open Payments User Guide

Step 2: Select the reporting entity name and the program year for which you wish to view disputes from the drop-down menus. When finished, select “Show Disputes.”

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization Switch User Type

Home | Submissions (Submit, Review, Attest) | **Review and Dispute (View, Respond, Resolve)** | Manage Entities (Register, Edit, Nominate Roles) | My Profile (Account, Roles, Nominations) | Help

Review and Dispute Overview

A field with an asterisk (*) is required.

Applicable Manufacturer or Applicable GPO Records

Select a reporting entity and program year from the drop-down list below, then select “Show Disputes.” This will display records relating to payments or other transfers of value, or ownership or investment interests for the selected reporting entity and program year that are disputed.

The review and dispute process begins with an initial 45-day period for physicians, teaching hospitals, and principal investigators to review and dispute their data, followed by a 15-day correction period for reporting entities to resolve disputes and make necessary corrections to the data prior to publication.

Physicians, teaching hospitals, and principal investigators may initiate disputes with reporting entities from the start of the review and dispute period until the end of that calendar year.

If any disputes are initiated for the first time after the 45-day review and dispute period and not resolved within the 15-day correction period, the record will be published as not disputed in the initial annual data publication for that year.

If any dispute results in a change to the covered recipient or principal investigator information, the original record must be deleted and a new record submitted with the updated covered recipient information.

Only records for which attestation was completed by the submission deadline of that calendar year will be eligible for the review and dispute process for that calendar year.

For a complete list of review and dispute rules, refer to the User Guide located under “Resources” in the CMS Open Payments website.

*Show Disputes for:
ABCDEF Medical ▼

*Program Year:
2015 ▼

Show Disputes

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Open Payments User Guide

Step 3: On the Review and Dispute page, you will see a list of all data disputes that were initiated by physicians, teaching hospitals, and principal investigators.

If you wish, you may filter the records by using the search criteria options that are shown. You do not need to filter the results in order to proceed. To view details about a disputed record, scroll to the right of the table using the scroll bar and select “View” under the “Action” column. For dispute resolution, a useful filter would be to filter for records with a “Review and Dispute Status” of “Acknowledged” and/or “Initiated,” as you can only update and/or correct record(s) with a review and dispute status of “Initiated” or “Acknowledged.” For instructions on how to export this data, see Section 5.1c.

To manually edit a record, scroll to the right, select “Edit” under the “Action” column, and edit the appropriate fields. For detailed instructions on how to manually edit a record, see Section 4.7e. To manually delete a record, follow the detailed instructions in Section 4.8b.

To edit a record via bulk file upload, create a bulk data file that contains the records to be corrected. In each record in this bulk file, you must set the “Resubmission Indicator” to “Y” and enter the original Record ID created by the Open Payments system in the “Resubmitted Payment Record ID” field. This is necessary for the system to accept the record as a re-submission and not create a new record. Once you have prepared the re-submission file, submit the file per the standard file submission process. For detailed instructions on how to submit a bulk data file, see Section 4.4.

The dispute history of a record that has been updated will show versions of the record prior to the re-submission as having a status of “Inactive.”

Once the record has been changed, it must be re-attested to before it is made available to the covered recipient, and the dispute is considered resolved. See Section 5.3b.

Open Payments User Guide

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization Switch User Type

Home	Submissions Submit, Review, Attest	Review and Dispute View, Respond, Resolve	Manage Entities Register, Edit, Nominate Roles	My Profile Account, Roles, Nominations	Help
-------------	----------------------------------------------	-----------------------------------------------------	----------------------------------------------------------	--------------------------------------------------	-------------

Review and Dispute - ABCDEF Medical - 2015

[Back](#)

The table below contains the record(s) that have been disputed by physicians, teaching hospitals, or principal investigators. Users with the role of submitter for this reporting entity can take actions related to the dispute or edit the record(s) that are disputed. Once the disputed record is edited and re-attested, the associated dispute(s) on the record will move into "Resolved" status.

Please note: To view the entire table, use the horizontal scroll bar below the table. Use the filtering tools below to customize your view of the disputed records.

You may export your search results into a CSV file by selecting the link labeled "Download Disputes Zip File." Only one CSV file will be generated containing all three payment categories. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. If you attempt to download a file that exceeds the system limit (approximately 400,000 records), you will receive an on-screen error notification. To correct this error, adjust the filtering criteria to create smaller subsets of records and download them in multiple files. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Record ID column:

- Select "Acknowledge Dispute" to confirm that the reporting entity received the disputed record(s).
- Select "Edit" in the table below (use the scroll bar to see the "Action" column at the end of the table, and the "Edit" option) to edit the record details of the disputed record. Depending on the record status, it may not be editable.
- Select "Resolved No Change" to acknowledge that the reporting entity and the physician, teaching hospital, or principal investigator have resolved the dispute in accordance with the guidance in the Final Rule. This action should only be taken when dispute resolution does not require a change to the data by the reporting entity.

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

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

Applicable Manufacturer or Applicable GPO's Disputed Records

Dispute ID: Maximum 38 digits	Record ID: Maximum 38 digits	Home System Payment ID:	File ID: Maximum 38 digits
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Physician First Name:	Physician Last Name:	Teaching Hospital Name: Please Select	
<input type="text"/>	<input type="text"/>	<input type="text"/>	
Review and Dispute Status: Initiated Acknowledged Resolved No Change Withdrawn Resolved	Marked for Deletion: <input type="checkbox"/> Yes <input type="checkbox"/> No	Payment Category: <input type="checkbox"/> General Payments <input type="checkbox"/> Research Payments <input type="checkbox"/> Ownership or Investment Interest	Recipient Type: <input type="checkbox"/> Physician <input type="checkbox"/> Teaching Hospital
Download Disputes Zip File Search Clear All			

Showing Results for: [All]

Show Entries 10

[Acknowledge Dispute](#) [Resolved No Change](#)

File ID	Amount (\$)	Date of Payment	Recipient	Delay in Publication of Research Payment Indicator	Date Dispute Initiated	Dispute Last Modified By	Record Status	Marked for Deletion	Review and Dispute Status	History of Disputes	Action
	\$9.03	2013-08-01	John Miller	No	2015-09-30	Tom Smith	Attested	No	Resolved No Change	View	View Edit

< < Page 1 of 1 > > 1 Go

5.3b: Re-Submission and Re-Attestation

Entities submitting corrected data must both re-submit and re-attest to the corrected data for the updates to be included in the public posting. Once re-attestation is complete, the records will be automatically placed in a review and dispute status of “Resolved.” No further action is needed from the reporting entity.

It is strongly recommended that you do not delete the original record and replace it with a new one, unless the dispute resolution changes any of the fields that identify the covered recipient in that record. In such cases, the original record **must** be deleted and resubmitted as a new record.

If a record is deleted and replaced after the reporting deadline, the Open Payments system will treat the record as a newly arriving late record rather than a correction. The new records will not be included in the current publication cycle and will be identified as eligible for review and dispute for a future publication. Once a record is deleted, it will no longer be visible to the covered recipients and principal investigators that were identified in it. A record marked for deletion but not yet deleted is still visible to the covered recipients and principal investigators identified in it.

The attester will need to re-attest to the accuracy of all re-submitted or deleted data. An attester can only attest to records that have been successfully submitted and validated. Additionally, the attester may decline to attest and request that some or all of the data submitted be returned to the submitter for corrections and review. The attester can select one or more records to return to the submitter and then select the “Return to Submitter” button. The submitter must perform the corrective actions requested by the attester or indicate that no action is required, then resubmit the payment record(s) for attestation. For more detailed instructions on attestation of data, see Section 4.13

For detailed instructions on submitting data, see Chapter 4. For details on how data resubmission affects publication dates, see Chapter 8.

PART IV: PHYSICIANS AND TEACHING HOSPITALS

Open Payments Registration For Physicians and Teaching Hospitals

Chapter 6: Physician and Teaching Hospital Registration

This chapter provides information for physician and teaching hospital registration in CMS's Enterprise Identity Management system (EIDM) and the Open Payments system. Both registrations are required to obtain access to the Open Payments system. All physicians and teaching hospitals who wish to view data reported about them must complete both registrations prior to accessing the system.

This chapter is divided into the following sections:

- **Two-Step Registration Process** provides an overview of the Registration process. Registration includes user registration in EIDM, as well as user registration in the Open Payments system.
- **EIDM Registration** provides an overview of the first step in registration, how to register for EIDM and request access to the Open Payments system.
- **Registration in the Open Payments System** provides walkthroughs of various scenarios for registering a physician or a teaching hospital in the Open Payments system.
- **Open Payments Users and User Roles** contains information on who is authorized to register in the Open Payments system and the user roles that must be filled by the Open Payments system users.
- **Nominations** contains information on how to nominate other individuals for roles associated with physicians and teaching hospitals.
- **Updating Profile Information in the Open Payments System** contains information on how physicians, physician authorized representatives, and users affiliated with teaching hospitals can update their profiles in the Open Payments system.

Section 6.1: Two-Step Registration Process

Physicians and teaching hospitals must register in the Open Payments system in order to view, review, and/or dispute data submitted about them.

Note: Physicians and teaching hospitals are not required to register but are encouraged to do so in order to view information reported about them prior to CMS's publication of the data.

Registration for Open Payments is a two-step process. First, users must register in EIDM to obtain EIDM credentials and request access to the Open Payments system. Once the user has obtained EIDM credentials, he or she will be able to register in the Open Payments system.

Section 6.2: Enterprise Identity Management (EIDM) Registration and Open Payments Access

Enterprise Identity Management (EIDM) is an identity management and services system that (1) serves as an identity proofing tool to verify a person's identity; and (2) provides users with access to various CMS applications. Registering in EIDM provides users with log in credentials **required** for access to the Open Payments system. Users will be able to set up their own log in credentials in the form of a user ID and password during the EIDM registration process. EIDM credentials allow users to log in to the CMS Enterprise Portal and request access to various CMS applications, including the Open Payments system.

EIDM can be accessed and the registration process can begin on the CMS Enterprise Portal at <https://portal.cms.gov>. A complete EIDM Operations Document and a list of EIDM FAQs are available on the CMS website at <http://www.cms.gov>. Users who already have EIDM credentials can move ahead to request access to the Open Payments application.

EIDM will lock your user account if you do not log in to your account for 60 or more days. When you log in after 60-days, the system will display the "Unlock my Account" view. To unlock your account, enter your user ID and correctly answer all challenge questions. Then enter your new password in the input fields of "New Password" and "Confirm New Password" to unlock your account. If you are still unable to reactivate your account, contact the Open Payments Help Desk at openpayments@cms.hhs.gov or call 1-855-326-8366.

EIDM will automatically deactivate any user that has not logged in for 180-days or more. Once the user's account has been disabled, the user will not be able to access any CMS application(s) available through EIDM. You can contact the Open Payments Help Desk at openpayments@cms.hhs.gov or call 1-855-326-8366 to reactivate your account after 180-days of inactivity.

NOTE FOR INDIVIDUALS WITH FOREIGN ADDRESSES: Individuals with addresses outside of the United States can enter their foreign address during registration. However, identity proofing will take place manually. Contact the Open Payments Help Desk at openpayments@cms.hhs.gov for assistance with this manual proofing process.

For step-by-step instructions on how to register in CMS's Enterprise Portal, refer to Section 3.2 of this User Guide.

Section 6.3: Registering in the Open Payments System

A physician must register him- or herself in the Open Payments system and undergo a vetting process to be fully registered in the Open Payments system. See Section 6.3c for more on physician vetting. Physician registration has five steps, as shown in **Figure 6.1** below. Details on these steps are included later in this chapter.

Figure 6.1: Physician Registration Process



Figures 6.2 and 6.3 detail the fields which are required and optional when creating physician and user profiles. It is important to have this information on-hand prior to beginning the registration process.

Figure 6.2: Required and Optional Fields for Physician Profiles

Fields	Required or Optional?
Practice Name	Optional
Practice Business Address	Required
Physician Primary Type	Required
Physician National Provider Identifier (NPI)**	Optional
Drug Enforcement Administration (DEA) Number**	Optional
Primary Taxonomy Code	Required
License State (at least 1)	Required
License Number (at least 1)	Required

**The National Provider Identifier (NPI) and Drug Enforcement Administration (DEA) Number must be entered if you have them. If you do not have these identifiers, you can still proceed with registration.

When registering in the Open Payments system, physicians must enter all of the state license numbers they hold, as well as their NPI number (if they have one). This is because records submitted to Open Payments are associated with physician license numbers and NPI. If a physician does not provide all of this identifying information, he or she will not be able to see all records identifying him or her. For example, a physician who has an NPI and holds licenses in both Michigan and Ohio, yet provides only the Michigan license number and no NPI in her profile, would not be able to see any records in Open Payments that identify her by her Ohio license number or NPI.

Open Payments User Guide

Figure 6.3: Required and Optional Fields for Individual User Profiles

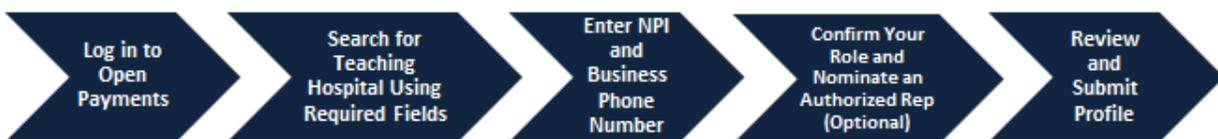
Fields	Required or Optional
First Name	Required
Middle Name	Optional
Last Name	Required
Name Suffix	Optional
Job Title (for Physician)	Optional
Job Title (for Authorized Representative)	Required
Business Address	Required
Business Phone Number	Required
Business Email Address	Required

Teaching hospitals are pre-populated into the Open Payments system based on the Open Payments Teaching Hospital List, which is maintained by CMS and updated annually. Teaching hospitals do not need to be vetted after registration and are approved immediately in the Open Payments system after registration with a status of “vetted.” Note that no vetting occurs beyond that done to create the annual Teaching Hospital List. CMS makes the current and past Teaching Hospital Lists available on the Resources page of the CMS Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>. Teaching hospitals not on the lists will not have payments or other transfers of value reported about them.

Teaching hospitals must register using the hospital’s “Doing Business As” name rather than its legal name, unless you are registering the teaching hospital for program year 2013. (For directions on registering a teaching hospital for a prior program year, see Section 6.3f.) In the Teaching Hospital List, the “Doing Business As” name is under the heading of “Hospital Name.” The address should be the “NPPES Business Address.”

Teaching hospital registration has five steps, as shown in **Figure 6.4** below. Details on these steps are included later in this chapter.

Figure 6.4: Teaching Hospital Registration Process



Figures 6.5 and **6.6** detail which fields are required and which fields are optional when creating teaching hospital and user profiles. It is important to have this information on-hand prior to beginning the registration process.

Open Payments User Guide

Figure 6.5: Required and Optional Fields for Teaching Hospital Profiles

Fields	Required or Optional?
State Where Teaching Hospital is Located	Required
Teaching Hospital Doing Business As Name	Required
Teaching Hospital Business Address	Required
Taxpayer Identification Number (TIN)	Required

Figure 6.6: Required and Optional Fields for Individual User Profiles

Fields	Required or Optional?
First Name	Required
Middle Name	Optional
Last Name	Required
Suffix	Optional
Job Title	Required
Business Address	Required
Business Phone Number	Required
Business Email Address	Required
City Name	Required
State	Required
Zip Code	Required

The entire registration process takes approximately 30 minutes and must be completed in a single session. Users cannot save entries or complete the profile at a later time. Users will be able to edit, manage, or update a profile once it is created. **Note: The system times out after 30 minutes of inactivity and it does not have an auto-save feature. If the system times out, your updates will not be saved.**

Important notes on Open Payments physician and teaching hospital registration:

- If your teaching hospital was registered in a previous year, it does not need to be registered again.
- Registration must be completed in one session.
- Never use the navigation buttons on your browser toolbar. Only use the navigation buttons (i.e., “Back” button) within the Open Payments system itself.
- If you do not know your 10-digit NPI number, you can find it on the NPI Registry, located at <https://npiregistry.cms.hhs.gov/>.

Open Payments User Guide

- If you cannot find your DEA number, contact the DEA Office of Diversion Control. Their website is <https://www.deadiversion.usdoj.gov>.

6.3a: Registering as a Physician (First Time System Users)

If you are registering as a physician and are a first-time user in the Open Payments system, follow the steps below.

Note: If you are a physician who works in a teaching hospital and wish to see data related to you in your capacity as a physician, select the “Physician” option when registering. If you are a physician who works in a teaching hospital and wish to represent that teaching hospital as an authorized official or authorized representative, follow the instructions in Section 6.3d for registering a teaching hospital.

Note that if you select the “Teaching Hospital” option when registering, you will only be able to view payments made to the teaching hospital you are associating yourself with. If you wish to see data related to you as a physician, register a second time and select the “Physician” option. Users may be registered for both options and can alternate between physician and teaching hospital profiles using the “Switch User” functionality described in Section 6.3g.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page. The on-screen text contains important information regarding the registration process. Read the on-screen text and select “Create My Profile” when you are ready to begin the registration process.



Open Payments User Guide

Step 2: The on-screen text contains important information regarding creating the physician profile. Read the on-screen text and select “Start Profile” at the bottom of the page when you are ready to continue.

Open Payments (Sunshine Act)

Create Profile

1 Select Profile Type

2 Register Entity

To begin creating a profile and registering in the Open Payments system, you must identify your affiliation with an applicable manufacturer, applicable group purchasing organization (GPO), teaching hospital, or physician.

If the applicable manufacturer, applicable GPO, teaching hospital, or physician

Once you are ready to begin, select “Start Profile.”

Cancel Start Profile

Step 3: Select the profile type “Physician” and select “Continue.”

Open Payments (Sunshine Act)

Select Profile Type

A field with an asterisk (*) is required.

If you do not have a registration ID and/or nomination ID, begin creating your profile by indicating below whether you are affiliated with an applicable manufacturer or applicable GPO, teaching hospital, or physician.

If you received a registration ID and/or nomination ID in an email notifying you of your nomination role, you may begin creating your profile by selecting the “I have a Registration ID and Nomination ID” link.

Note that if you wish to register as a physician authorized representative, you must have a nomination ID. You cannot nominate yourself for a physician authorized representative role.

If you are a physician that is affiliated with a teaching hospital, you should register yourself as a physician and not as a teaching hospital. Physicians can view records submitted about them only if they register themselves as physicians. Registering as a teaching hospital will allow you to view only records submitted about the teaching hospital. If you have any questions regarding the user type you should register as, please contact the Open Payments Help Desk (openpayments@cms.hhs.gov) for guidance.

*Required: Select the type of entity or covered recipient you are affiliated with OR the “I have a Registration and Nomination ID” link.

Applicable manufacturer or applicable group purchasing organization (GPO)

Physician

Teaching hospital

----- OR -----

[I have a Registration ID and Nomination ID](#)

Cancel Continue

Open Payments User Guide

Step 4: Enter your personal information. All required fields will be marked with an asterisk(*). You will not be able to proceed with registration until all of the required fields have been entered.

If you are registered with the National Plan and Provider Enumeration System (NPPES), ensure that you enter your name exactly as it is in NPPES.

When you are done, select “Continue.”

Note: Selecting the “Cancel” button will cause you to lose all data entered.

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Personal Information**
- Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Physician: Personal Information

A field with an asterisk (*) is required.

Review the prepopulated information below and enter the required personal and business information. The first name and last name fields have been prepopulated from your CMS Enterprise Identity Management system (EIDM) profile. You may edit these fields as needed. However, changing this information in Open Payments will not change the corresponding information in your EIDM profile.

This information must match exactly as referenced in the National Plan & Provider Enumeration System (NPPES) in order for registration to be successful.

Note that once a physician profile has been successfully vetted, the fields prepopulated by EIDM data will no longer be editable. If you need to modify these fields after they have become non-editable, contact the Open Payments Help Desk at (openpayments@cms.hhs.gov) for assistance.

Your Name

*First Name: Mary	Middle Name:
*Last Name: Davis	Suffix (Jr., Sr., etc.):

Business Information

Enter your business email address, business telephone number and practice location. This information will be used to help verify your identity as a physician. If you have multiple practice addresses, enter the primary business address.

*Business Email Address: openpayments@yopmail.com	*Business Telephone Number: 999-999-9999 555-555-5555
------------------------------------------------------	-------------------------------------------------------------

Physician Practice Name:

Physician Practice Business Address

*Practice Business Address, Line 1:
7500 Security Blvd

Practice Business Address, Line 2:

*City Name: Baltimore	*State: Maryland	*Zip Code: 99999 9999 21244
--------------------------	---------------------	-----------------------------------

Cancel Back Continue

Open Payments User Guide

Step 5: Enter your physician details. All required fields will be marked with an asterisk(*).

Note that while the National Provider Identifier (NPI) and Drug Enforcement Administration (DEA) Number fields are not marked as required, they must be entered if you have them. If you do not have these identifiers, you can still proceed with registration.

Refer to the [taxonomy code list in Appendix C](#) for a complete listing of the available taxonomy codes.

To add your licensing information, select “Add License” and enter the state in which the license is held and the license number. The license number field may contain up to 25 characters, including special characters such as hyphens(-). You are required to enter at least one license. When you are done, select “Add.” If the physician has licenses in more than one state, enter in the first state and license number and then select “Add License.” Repeat until all of the physician’s state licenses have been added. You can enter up to 52 licenses. When you are finished, select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Personal Information
- Physician Details**
- Authorized Representative
- Review and Submit Profile

Physician: Physician Details

A field with an asterisk (*) is required.

Enter the required physician information below. Physicians must provide their National Provider Identifier (NPI), if they have one. If you have an NPI, the information that you use to register must match the information exactly as it is entered within the National Plan & Provider Enumeration System (NPPES) to ensure successful registration.

Note: Do not enter a NPI if you obtained it after January 1st of the current year. If you do not enter an NPI for this reason, next year you must revise your physician profile to include your NPI.

Physician Identification

Physician Primary Type:
Medical Doctor

National Provider Identification (NPI):
This is a 10-digit number
1234567890

Drug Enforcement Administration (DEA) Number:
This is a 3-digit alphanumeric ID

Physician Taxonomy Codes

Enter the Physician Taxonomy Code in the text box below and select "Add" when finished. If you have more than one taxonomy code, you may enter each one separately and select "Add." You may edit or delete any previously entered taxonomy codes by selecting the "Edit" or "Delete" buttons. You must have at least one taxonomy code entered.

Refer to the Medicare Provider/Supplier to the Healthcare Provider Taxonomy list in the Open Payments User Guide for the complete list of taxonomy codes that can be entered. Taxonomy codes that are not identified in the list cannot be entered in the system. If an exact match cannot be found, choose the taxonomy code that best identifies you as a health care provider.

Physician Taxonomy Code:	Actions:
208J00000X	Edit

Add

State Licensing Information

To enter your license information, select the state and license number in the fields below. Select "Add" when finished. Enter each state and license number separately until all licenses have been added. You must add at least 1 license number and may add up to 52. You may edit or delete any previously entered license information by selecting the "Edit" or "Delete" buttons.

License State:	License Number:	Actions:
Maryland	1234567890	Edit

Add

Cancel Back Continue

Open Payments User Guide

Step 6: At this point in registration, you may nominate an individual to serve as your authorized representative within the Open Payments system. By default, “Designate an Authorized Representative” will be selected. **A physician cannot be his or her own authorized representative.**

To designate an authorized representative, enter the required information. You will also be asked to select the access level for the authorized representative. Authorized representative access levels are explained in depth in Section 6.4a. The access levels are also summarized on the page. When you are finished, select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Personal Information
- Physician Details
 - Authorized Representative**
 - Review and Submit Profile
- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy (PDF, 192 KB)

Physician: Authorized Representative

A field with an asterisk (*) is required.

A physician may designate the authorized representative to take certain actions on his or her behalf in the Open Payments system. This person can be another physician, an office manager, a practice manager, or another person the physician would like to designate to interface with the Open Payments system on his or her behalf.

The nominated authorized representative will receive an email stating that he or she has been nominated for the role. The nominated authorized representative must accept this role in the Open Payments system to become an authorized representative. If the nominee does not accept the role, the physician may nominate another person.

Nominate the Authorized Representative in the Open Payments System

Nominations can be made now by providing the authorized representative's information below, or later via the physician profile page. The nominee will have 10 days to accept or reject the role. Open Payments will render the nomination inactive if the nominee does not respond within 10 days.

Please note that an authorized representative nominee must register in the CMS Enterprise Identity Management (EIDM) system to obtain login credentials before he or she can register and accept his or her user role in the Open Payments system. If the nominee accepts the role, he or she will then be prompted to create an individual profile in the Open Payments system.

Designate an authorized representative?
Designate an authorized representative ▼

Authorized Representative

Enter the name, business email, job title, and business telephone number of the nominated authorized representative.

*Authorized Representative's First Name: Joe	Authorized Representative's Middle Name
*Authorized Representative's Last Name: Smith	Authorized Representative's Suffix
*Business Email Address: openpayments@yopmail.com	*Business Telephone Number: 900-000-0000 555-555-5555

*Job Title:
Office Manager

Authorized Representative's Business Address

Enter the nominated authorized representative's business address information below. Enter the primary business address if the authorized representative has multiple business addresses.

*Business Address, Line 1:
7500 Security Blvd

Business Address, Line 2:

*City Name: Baltimore	*State: Maryland	*Zip Code: 99999 9999 21244
--------------------------	---------------------	-----------------------------------

Nominated Authorized Representative's Access Level

By default, the authorized representative can read any information in the physician's profile in the Open Payments system. Select any additional level(s) of access to be granted to the authorized representative below. The access level will determine the actions the authorized representative can take on behalf of the physician in the Open Payments system. Authorized representatives will not be able to edit their access levels.

*Access Level:

- Read - Default access level. Able to see physician profile and records information.
- Modify Profile - Able to edit or enter the physician's My Profile information (NPI, license, specialties, etc.).
- Dispute Records - Able to comment on information submitted about payments or other transfers of value, ownership, and investment interests with the submitter (applicable manufacturer or GPO). Also able to dispute reported payments or other transfers of value, ownership, and investment interests.

Cancel Back Continue

Open Payments User Guide

You do not need to designate an authorized representative during initial registration and may do so at a later time. If you choose not to designate an authorized representative at this time, select “Not Now” and then select “Continue.” For instructions on how to nominate an authorized representative after registration is complete, see Section 6.5a.

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Personal Information
 - Physician Details
 - Authorized Representative**
 - Review and Submit Profile
- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Physician: Authorized Representative

A field with an asterisk (*) is required.

A physician may designate the authorized representative to take certain actions on his or her behalf in the Open Payments system. This person can be another physician, an office manager, a practice manager, or another person the physician would like to designate to interface with the Open Payments system on his or her behalf.

The nominated authorized representative will receive an email stating that he or she has been nominated for the role. The nominated authorized representative must accept this role in the Open Payments system to become an authorized representative. If the nominee does not accept the role, the physician may nominate another person.

Nominate the Authorized Representative in the Open Payments System

Nominations can be made now by providing the authorized representative's information below, or later via the physician profile page. The nominee will have 10 days to accept or reject the role. Open Payments will render the nomination inactive if the nominee does not respond within 10 days.

Please note that an authorized representative nominee must register in the CMS Enterprise Identity Management (EIDM) system to obtain login credentials before he or she can register and accept his or her user role in the Open Payments system. If the nominee accepts the role, he or she will then be prompted to create an individual profile in the Open Payments system.

***Designate an authorized representative?**

Not now

Cancel Back Continue

Open Payments User Guide

Step 7: Review the information entered. Select the “Back” button at the bottom of the page to go back and edit any information. Once you have reviewed the information and determined it to be correct, select “Submit.”

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ✓ Personal Information
- Physician Details
- Authorized Representative
- 3 Review and Submit Profile**

- Access the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Review and Submit Profile

Review the information on this page to ensure it is correct. Select “Back” to navigate to the previous pages to correct any invalid information. Select “Submit Profile” to submit your profile.

Personal Information

Name:
Mary Davis

Business Email Address:
openpayments@yopmail.com

Business Telephone Number:
555-555-5555

Physician Practice Name:

Physician Practice Business Address:
7500 Security Blvd
Baltimore, Maryland 21244

Physician Information

Physician Primary Type:
Medical Doctor

National Provider Identifier (NPI):
1234567890

Drug Enforcement Administration (DEA) Number:

Taxonomy Codes:
1 - 208D00000X - Allopathic & Osteopathic Physicians[General Practic.e]

State Licenses:
Maryland 1234567890

Physician's Authorized Representative

Authorized Representative:
Joe Smith

Business Email Address:
openpayments@yopmail.com

Business Telephone Number:
555-555-5555

Job Title:
Office Manager

Business Address:
7500 Security Blvd
Baltimore, MD 21244

Access Level:
Review Data (Read-Only)
Edit Physician profile
Dispute Data

Open Payments User Guide

The following message will appear on-screen to confirm your profile has been successfully created. If you have chosen to delegate someone to be an authorized representative, an email notification with a nomination ID will be sent to that individual.

Open Payments (Sunshine Act)
Physician Switch User Type

Create Profile

- ✓ Select Profile Type
- ✓ Physician Information
- ✓ Authorized Representative
- ✓ Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

You have successfully created your profile as a physician.

Mary Davis

You may now

- Go to [Open Payments Home](#).
- Refer to the [Open Payments User Guide](#) for further information

Note: You will not be able to take any actions in the Open Payments system related to this profile until the profile is registered. The profile will be registered once your identity as a physician is successfully vetted. This vetting process should be completed within 24 hours.

If you are not successfully vetted, contact the Open Payments Help Desk (openpayments@cms.hhs.gov) for next steps. More information on vetting is available in the [Open Payments User Guide](#).

6.3b: Registering as a Physician for a User with Another Role (Returning System Users)

If you are registering a physician and you are already affiliated with a reporting entity or teaching hospital in the Open Payments system, follow the steps below.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page. Select the “My Profile” tab from the menu bar on the Open Payments landing page.

Open Payments (Sunshine Act)
Physician Switch User Type

Home Review and Dispute (Review, Affirm, Dispute) Manage Physicians (Register, Edit, Nominate Roles) **My Profile (Account, Roles, Nominations)** Help

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - Review and dispute functionality in the Open Payments system is unavailable until April 2016. CMS will announce the beginning of the review and dispute period via the Open Payments listserv.

You may register or affiliate yourself with a teaching hospital, accept or request nominations, and review your profile information. Resources to complete these actions are located on the Resources page of the Open Payments website.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

You can manage your user profile and perform the actions associated with your profile. Note: In order to be able to review all records submitted for you, you must have entered your NPI, if available, and all state licenses under your profile details in Open Payments system.

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: From the “My Profile Overview” tab, select the “My Profile Details” tab. Review your profile information displayed on the page. To make any corrections, select “Update Profile.” Any corrections made here will update your information for any profile you have in the Open Payments system.

To proceed in registering as a physician, select “Register as a Physician.”

Note: Changes made here will not automatically update your profile information in your other CMS accounts.

Open Payments (Sunshine Act)
Physician Switch User Type

Home Review and Dispute (Review, Affirm, Dispute) Manage Physicians (Register, Edit, Nominate Roles) **My Profile** (Account, Roles, Nominations) Help

My Profile

Mary Davis

Overview **My Profile Details** My Roles & Nominations

To update your profile details, including adding or updating authorized representative information, select the “Update Profile” button.

Register as a Physician Update Profile

Personal Information

Name: Mary Davis	Job Title: Office Manager
Business Email Address: openpayments@yopmail.com	Business Address: 7500 Security Blvd Baltimore, MD 21244
Business Telephone Number: 555-555-5555	

Access the Open Payments User Guide
Need help with the website? Contact Us by email
Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 3: Enter your personal information. All required fields will be marked with an asterisk(*). You will not be able to proceed with registration until all of the required fields have been entered.

If you are registered with the National Plan and Provider Enumeration System (NPPES), ensure that you enter your name exactly as it is in NPPES.

When you are done, select “Continue.”

Note: Selecting the “Cancel” button will cause you to lose all data entered.

The screenshot shows the 'Open Payments (Sunshine Act)' registration interface for a 'Physician Switch User Type'. The main heading is 'Physician: Personal Information'. A navigation bar at the top includes 'Home', 'Review and Dispute', 'Manage Physicians', 'My Profile', and 'Help'. A sidebar on the left contains 'Create Profile' steps: 'Select Profile Type', 'Personal Information' (current step), and 'Review and Submit Profile'. Below these are links for the user guide, help, and privacy policy. The main form area contains instructions and a 'Your Name' section with fields for First Name (Mary), Middle Name, Last Name (Davis), and Suffix. The 'Business Information' section includes fields for Business Email Address (openpayments@yopmail.com), Business Telephone Number (555-555-5555), Physician Practice Name, Practice Business Address (Line 1: 7500 Security Blvd, Line 2), City Name (Baltimore), State (Maryland), and Zip Code (21244). At the bottom, there are 'Cancel', 'Back', and 'Continue' buttons.

Open Payments (Sunshine Act)

Physician Switch User Type

Home Review and Dispute (Review, Affirm, Dispute) Manage Physicians (Register, Edit, Nominate Roles) My Profile (Account, Roles, Nominations) Help

Create Profile

- Select Profile Type
- Personal Information**
- Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? **Contact Us** by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Physician: Personal Information

A field with an asterisk (*) is required.

Review the prepopulated information below and enter the required personal and business information. The first name and last name fields have been prepopulated from your CMS Enterprise Identity Management system (EIDM) profile. You may edit these fields as needed. However, changing this information in Open Payments will not change the corresponding information in your EIDM profile.

This information must match exactly as referenced in the National Plan & Provider Enumeration System (NPPES) in order for registration to be successful.

Note that once a physician profile has been successfully vetted, the fields prepopulated by EIDM data will no longer be editable. If you need to modify these fields after they have become non-editable, contact the Open Payments Help Desk at (openpayments@cms.hhs.gov) for assistance.

Your Name

*First Name: Middle Name:

*Last Name: Suffix (Jr., Sr., etc.):

Business Information

Enter your business email address, business telephone number and practice location. This information will be used to help verify your identity as a physician. If you have multiple practice addresses, enter the primary business address.

*Business Email Address: *Business Telephone Number:

Physician Practice Name:

Physician Practice Business Address

*Practice Business Address, Line 1:

Practice Business Address, Line 2:

*City Name: *State: *Zip Code:

Open Payments User Guide

Step 4: Enter your physician details. All required fields will be marked with an asterisk(*). You will not be able to proceed with registration until all of the required fields have been entered. The National Provider Identifier (NPI) and Drug Enforcement Administration (DEA) Number must be entered if you have them. If you do not have these identifiers, you can still proceed with registration.

If you have an NPI, enter it exactly as it is listed in NPPES for the current calendar year. Do not enter an NPI if you obtained it after January 1st of the current year. If you do not enter an NPI for this reason, next year you must revise your physician profile to include your NPI.

Refer to the [taxonomy code list in Appendix C](#) for a complete listing of the available taxonomy codes. Taxonomy codes not on the taxonomy code list may not be entered.

To add your licensing information, select “Add License” and enter the state in which the license is held, and the license number, up to 25 characters. You are required to enter at least one license. The license number field accepts letters, numbers, and all special characters found on a standard U.S. keyboard, not including ALT+NUMPAD ASCII Key characters. When you are done, select “Add.” If you have licenses in more than one state, enter in the first state and license number and then select “Add License.” Repeat until all of your state licenses have been added. You can enter up to 52 licenses. When you are finished, select “Continue.”

Open Payments (Sunshine Act)

Physician Switch User Type

Home Review and Dispute (Review, Affirm, Dispute) Manage Physicians (Register, Edit, Nominate Roles) My Profile (Account, Roles, Nominations) Help

Create Profile

- Select Profile Type
- Personal Information
- Physician Details** (Authorized Representative)
- Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Physician: Physician Details

A field with an asterisk (*) is required.

Enter the required physician information below. Physicians must provide their National Provider Identifier (NPI), if they have one. If you have an NPI, the information that you use to register must match the information exactly as it is entered within the National Plan & Provider Enumeration System (NPPES) to ensure successful registration.

Note: Do not enter a NPI if you obtained it after January 1st of the current year. If you do not enter an NPI for this reason, next year you must revise your physician profile to include your NPI.

Physician Identification

Physician Primary Type:
Medical Doctor

National Provider Identification (NPI):
This is a 10-digit number
1234567890

Drug Enforcement Administration (DEA) Number:
This is a 9-digit alphanumeric ID

Physician Taxonomy Codes

Enter the Physician Taxonomy Code in the text box below and select "Add" when finished. If you have more than one taxonomy code, you may enter each one separately and select "Add." You may edit or delete any previously entered taxonomy codes by selecting the "Edit" or "Delete" buttons. You must have at least one taxonomy code entered.

Refer to the Medicare Provider/Supplier to the Healthcare Provider Taxonomy list in the Open Payments User Guide for the complete list of taxonomy codes that can be entered. Taxonomy codes that are not identified in the list cannot be entered in the system. If an exact match cannot be found, choose the taxonomy code that best identifies you as a health care provider.

Physician Taxonomy Code:	Actions:
202C00000X	Edit

Add

State Licensing Information

To enter your license information, select the state and license number in the fields below. Select "Add" when finished. Enter each state and license number separately until all licenses have been added. You must add at least 1 license number and may add up to 52. You may edit or delete any previously entered license information by selecting the "Edit" or "Delete" buttons.

License State:	License Number:	Actions:
Maryland	1234567890	Edit

Add

Cancel Back **Continue**

Open Payments User Guide

Step 5: At this point in registration, you may nominate an individual to serve as your authorized representative within the Open Payments system. By default, “Designate an Authorized Representative” will be selected. **A physician cannot be his or her own authorized representative.**

To designate an authorized representative, enter the required information. You will also be asked to select the access level for the authorized representative. Authorized representative access levels are explained in depth in Section 6.4a. The access levels are also summarized on the page. When you are finished, select “Continue.”

You do not need to designate an authorized representative during initial registration and may do so at a later time. If you choose not to designate an authorized representative at this time, select “Not Now” and then select “Continue.” For instructions on how to nominate an authorized representative after registration is complete, see Section 6.5a.

Open Payments (Sunshine Act)
Physician Switch User Type

Home | **Review and Dispute** (Review, Affirm, Dispute) | **Manage Physicians** (Register, Edit, Nominate Roles) | **My Profile** (Account, Roles, Nominations) | Help

Create Profile

- Select Profile Type
- Personal Information
- Physician Details
- Authorized Representative**
- Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Physician: Authorized Representative

A field with an asterisk (*) is required.

A physician may designate the authorized representative to take certain actions on his or her behalf in the Open Payments system. This person can be another physician, an office manager, a practice manager, or another person the physician would like to designate to interface with the Open Payments system on his or her behalf.

The nominated authorized representative will receive an email stating that he or she has been nominated for the role. The nominated authorized representative must accept this role in the Open Payments system to become an authorized representative. If the nominee does not accept the role, the physician may nominate another person.

Nominate the Authorized Representative in the Open Payments System

Nominations can be made now by providing the authorized representative's information below, or later via the physician profile page. The nominee will have 10 days to accept or reject the role. Open Payments will render the nomination inactive if the nominee does not respond within 10 days.

Please note that an authorized representative nominee must register in the CMS Enterprise Identity Management (EIDM) system to obtain login credentials before he or she can register and accept his or her user role in the Open Payments system. If the nominee accepts the role, he or she will then be prompted to create an individual profile in the Open Payments system.

***Designate an authorized representative?**

Not now

Cancel | Back | **Continue**

Open Payments User Guide

Step 6: Review the information entered. Select the “Back” button at the bottom of the page to go back and edit any information. Once you have reviewed the information and determined it to be correct, select “Submit.”

Open Payments (Sunshine Act)

Physician Switch User Type

Home | **Review and Dispute** (Review, Affirm, Dispute) | Manage Physicians (Register, Edit, Nominate Roles) | My Profile (Account, Roles, Nominations) | Help

Create Profile

- ✓ Select Profile Type
- ✓ Personal Information
- Physician Details
- Authorized Representative
- 3 Review and Submit Profile**

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Review and Submit Profile

Review the information on this page to ensure it is correct. Select "Back" to navigate to the previous pages to correct any invalid information. Select "Submit Profile" to submit your profile.

Personal Information

Name: Mary Davis

Business Email Address: openpayments@yopmail.com

Business Telephone Number: 555-555-5555

Physician Practice Name:

Physician Practice Business Address: 7500 Security Blvd, Baltimore, Maryland 21244

Physician Information

Physician Primary Type: Medical Doctor

National Provider Identifier (NPI): 1234567890

Drug Enforcement Administration (DEA) Number:

Taxonomy Codes: 1 202C00000X - Allopathic & Osteopathic Physicians[Independent Medical Examiner]

State Licenses: Maryland 1234567890

Cancel | Back | **Submit**

Open Payments User Guide

The following message will appear on-screen to confirm your profile has been successfully created. If you chose to delegate someone to be an authorized representative, an email notification with further instructions will be sent to that individual.

The screenshot displays the 'Open Payments (Sunshine Act)' interface. At the top, there is a navigation bar with tabs for 'Home', 'Review and Dispute' (with sub-links 'Review, Affirm, Dispute'), 'Manage Physicians' (with sub-links 'Register, Edit, Nominate Roles'), 'My Profile' (with sub-links 'Account, Roles, Nominations'), and 'Help'. Below the navigation bar, the main content area is titled 'Create Profile' and shows a list of steps: 'Select Profile Type', 'Physician Information', 'Authorized Representative', and 'Review and Submit Profile', all marked with checkmarks. To the right of this list, a message states: 'You have successfully created your profile as a physician.' Below this, the name 'Mary Davis' is displayed. Underneath the name, it says 'You may now' followed by two bullet points: 'Go to Open Payments Home.' and 'Refer to the Open Payments User Guide for further information.' A 'Note' follows, stating: 'You will not be able to take any actions in the Open Payments system related to this profile until the profile is registered. The profile will be registered once your identity as a physician is successfully vetted. This vetting process should be completed within 24 hours.' Below the note, it says: 'If you are not successfully vetted, contact the Open Payments Help Desk (openpayments@cms.hhs.gov) for next steps. More information on vetting is available in the Open Payments User Guide.' On the left side of the main content area, there are three utility links: 'Access the Open Payments User Guide' (with a document icon), 'Need help with the website? Contact Us by email' (with a question mark icon), and 'Review the Open Payments Privacy Policy [PDF, 102 KB]' (with a lock icon).

6.3c: Physician Vetting

Vetting is the process of verifying a physician's identity. This is done to ensure that the physician is a valid covered recipient and to aid in the matching of submitted payments to the corresponding physicians. All physicians registering in the Open Payments system will be vetted. Vetting occurs once the physician has submitted his or her profile to the Open Payments system. **Physician registration is not considered complete until the vetting process has been successfully completed.**

The vetting process will typically require little action from the user in order to complete it. Once the physician submits the physician user profile, the vetting process begins. The process will attempt to vet the physician using the information provided in the physician profile, so it is important for the physician to provide as much information as possible to aid in the vetting process. Particularly important are the physician's first and last name, NPI, state license information, and primary type (if no NPI is provided). The Open Payments system will match physician information against multiple data sources.

If the vetting fails, the physician will have the opportunity to correct the information in his or her profile and resubmit the profile for vetting. The physician may update his or her profile as many times as necessary to successfully complete vetting.

Physicians must enter valid license information. If incorrect license information is entered, the physician will not be able to review records submitted for that state license. Physicians can perform actions only on record(s) associated with the state license that was entered and verified.

Open Payments User Guide

If the physician does not successfully pass vetting despite all of the information provided in the physician profile being correct to the best of his or her knowledge, or the physician requires assistance with successfully vetting their profile, contact the Open Payments Help Desk (openpayments@cms.hhs.gov) or call 1-855-326-8366.

The automatic vetting process normally takes less than 24 hours, though it could take longer depending upon the completeness of the information provided by the user and the number of physicians undergoing vetting at the same time.

Once vetting is successful, you will not be able to change the name or NPI referenced in your profile. If edits to either of these fields is required after successful vetting, contact the Open Payments Help Desk at openpayments@cms.hhs.gov for assistance. CMS encourages physicians to register and begin the vetting process as early as possible to allow sufficient time for vetting to be completed.

Note: If a physician profile is modified, the profile will undergo vetting again.

6.3d: Registering a Teaching Hospital (First Time System User)

If you are a first-time user registering a teaching hospital in the Open Payments system, follow the steps below. By registering a teaching hospital, you must take the role of authorized official for the teaching hospital in the Open Payments system. See Section 6.4b for information on user roles for teaching hospitals.

Note that a physician who is employed by a teaching hospital should not register him- or herself with the option “Teaching Hospital” unless he or she will represent the teaching hospital regarding the data reported by applicable manufacturers and applicable GPOs. Physicians who select the “Teaching Hospital” option when registering will only be able to view payments made to the teaching hospital they are affiliated with. If you wish to see data related to you as a physician, register a second time and select the “Physician” option. Users may be registered for both options.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page. The on-screen text contains important information regarding the registration process. Read the on-screen text and select “Create My Profile” when you are ready to begin the registration process.

Open Payments (Sunshine Act)

Welcome to the Open Payments System

Our records indicate that you have not yet registered in the Open Payments system. Before you can perform any actions in the system, you must first create your profile and complete the registration process.

Create My Profile

- Access** the Open Payments User Guide
- Need help with the website? Contact Us** by email
- Review** the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: The on-screen text contains important information regarding creating the individual profile. Read the on-screen text and select “Start Profile” at the bottom of the page when you are ready to continue.

Open Payments (Sunshine Act)

Create Profile

To begin creating a profile and registering in the Open Payments system, you must identify your affiliation with an applicable manufacturer, applicable group purchasing organization (GPO), teaching hospital, or physician.

If the applicable manufacturer, applicable GPO, teaching hospital, or physician

Once you are ready to begin, select "Start Profile."

Cancel Start Profile

Step 3: Select the profile type, when finished select “Continue.”

Open Payments (Sunshine Act)

Select Profile Type

A field with an asterisk (*) is required.

If you do not have a registration ID and/or nomination ID, begin creating your profile by indicating below whether you are affiliated with an applicable manufacturer or applicable GPO, teaching hospital, or physician.

If you received a registration ID and/or nomination ID in an email notifying you of your nomination role, you may begin creating your profile by selecting the "I have a Registration ID and Nomination ID" link.

Note that if you wish to register as a physician authorized representative, you must have a nomination ID. You cannot nominate yourself for a physician authorized representative role.

If you are a physician that is affiliated with a teaching hospital, you should register yourself as a physician and not as a teaching hospital. Physicians can view records submitted about them only if they register themselves as physicians. Registering as a teaching hospital will allow you to view only records submitted about the teaching hospital. If you have any questions regarding the user type you should register as, please contact the Open Payments Help Desk (openpayments@cms.hhs.gov) for guidance.

***Required: Select the type of entity or covered recipient you are affiliated with OR the "I have a Registration and Nomination ID" link.**

Applicable manufacturer or applicable group purchasing organization (GPO)

Physician

Teaching hospital

----- OR -----

[I have a Registration ID and Nomination ID](#)

Cancel Continue

Open Payments User Guide

Step 4: Search for the teaching hospital by selecting the appropriate state, teaching hospital legal name, teaching hospital business address, and Taxpayer Identification Number (TIN) from the drop-downs and select “Search.”

If your teaching hospital is not found, select “Register for Prior Program Year” to search for your teaching hospital using teaching hospital information from a previous program year. If you can find your teaching hospital only in a prior program year, you may select the teaching hospital and proceed with registration. For instructions on registering a teaching hospital for a prior program year, see Section 6.3f.

If your teaching hospital cannot be found in any program year, contact the Open Payments Help Desk at openpayments@cms.hhs.gov for assistance.

Teaching hospitals must be registered using the hospital’s “Doing Business As” name as the hospital name. In the CMS Teaching Hospital List, the “Doing Business As” name is under the heading of “Hospital Name.” (Note that this differs if you register the teaching hospital for program year 2013 only. Refer to Section 6.3f for detailed information on registering a teaching hospital for a prior program year.) The address selected should be the address listed in the CMS Teaching Hospital List as the hospital’s “NPPES Business Address.”

Teaching hospitals are pre-populated into the Open Payments system based on the Open Payments Teaching Hospital List. Teaching hospitals not on this list or prior program year lists will not have payments or other transfers of value reported about them.

Open Payments (Sunshine Act)

2 Teaching Hospital: Search

A field with an asterisk (*) is required.

To register your teaching hospital for the current program year, select the correct information from each of the dropdown fields below and select "Search." If your teaching hospital is not listed in the search results, select "Register for Prior Program Year" to continue with registration.

The teaching hospital list is updated annually by CMS. The teaching hospital list for the current program year, along with the list for previous program years, can be found on the CMS Open Payments website. If you do not find your teaching hospital listed, contact the Open Payments Help Desk at openpayments@cms.hhs.gov for assistance.

The user who registers a teaching hospital in the Open Payments system must take the role of authorized official for that hospital. The authorized official is responsible for registering the teaching hospital in the Open Payments system. The authorized official may also nominate other users, modify existing user roles, approve or deny nominations made by others, and approve or deny requests for user roles made by others.

Note: If you are a physician who is affiliated with a teaching hospital, you may proceed to view payments made to this teaching hospital, however you must also register as a physician to view payments made to you as a physician.

Register for Prior Program Year

*State Where Teaching Hospital is Located: Maryland

*Teaching Hospital Doing Business As Name: ABCDE Teaching Hospital

*Taxpayer Identification Number (TIN): 123456789

*Teaching Hospital Business Address: 7500 Security Blvd Baltimore MD 21244

Search

Cancel Back

Open Payments User Guide

Step 5: Review the information displayed on the page. Select “Continue” if the information displayed is the teaching hospital you wish to register. If this is not the correct teaching hospital, select the “Back” button at the bottom of the page to return to the previous page and re-enter the information.

Open Payments (Sunshine Act)

Create Profile

Select Profile Type

- ② Teaching Hospital: Search
- ③ Personal Information
- ④ Review and Submit Profile

[Access the Open Payments User Guide](#)

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

[Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)

2 Teaching Hospital: Search

A field with an asterisk (*) is required.

To register your teaching hospital for the current program year, select the correct information from each of the dropdown fields below and select “Search.” If your teaching hospital is not listed in the search results, select “Register for Prior Program Year” to continue with registration.

The teaching hospital list is updated annually by CMS. The teaching hospital list for the current program year, along with the list for previous program years, can be found on the [CMS Open Payments website](#). If you do not find your teaching hospital listed, contact the Open Payments Help Desk at openpayments@cms.hhs.gov for assistance.

The user who registers a teaching hospital in the Open Payments system must take the role of authorized official for that hospital. The authorized official is responsible for registering the teaching hospital in the Open Payments system. The authorized official may also nominate other users, modify existing user roles, approve or deny nominations made by others, and approve or deny requests for user roles made by others.

Note: If you are a physician who is affiliated with a teaching hospital, you may proceed to view payments made to this teaching hospital, however you must also register as a physician to view payments made to you as a physician.

[Register for Prior Program Year](#)

*State Where Teaching Hospital is Located:
Maryland

*Teaching Hospital Doing Business As Name:
ABCDE Teaching Hospital

*Taxpayer Identification Number (TIN):
123456789

*Teaching Hospital Business Address:
7500 Security Blvd Baltimore MD 21244

[Search](#)

Teaching Hospital Search Results

This teaching hospital is not yet registered in the Open Payments system:

 ABCDE Teaching Hospital
7500 Security Blvd
Baltimore, MD 21244
TIN: 123456789

If you wish to serve as an authorized official for the teaching hospital, select “Continue” to register the teaching hospital in the Open Payments system.

[Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

Step 6: Review the information displayed on the page. When complete, select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ② Teaching Hospital: Search
 - Register Teaching Hospital**
 - Your Role
 - Nominate Roles
- ③ Personal Information
- ④ Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Register Teaching Hospital

Review the teaching hospital information below to ensure this is the correct teaching hospital you wish to register. To proceed with registering this teaching hospital, select “Continue.” To select different search criteria and search for another teaching hospital, select “Back.”

ABCDE Teaching Hospital

Business Address: 7500 Security Blvd Baltimore, MD 21244	Taxpayer Identification Number (TIN): 123456789
-----------------------------------------------------------------------	-----------------------------------------------------------

Open Payments User Guide

Step 7: Review the information generated by the system related to your role. You must select the role of “Authorized Official” for yourself to proceed with registration. Information on teaching hospital user roles is available in Section 6.4b.

First name, last name, email address, and business phone will be pre-populated with information from your EIDM profile. Edit these fields as necessary. All required fields will be marked with an asterisk(*). You will not be able to proceed with registration until all of the required fields have been entered. When complete, select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Teaching Hospital: Search
 - Register Teaching Hospital
 - Your Role**
 - Nominate Roles
- Personal Information
- Review and Submit Profile

2 Teaching Hospital: Your Role

A field with an asterisk (*) is required.

To register a teaching hospital, you must have the role of authorized official of the teaching hospital.

Authorized officials are responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.

Your Role-Related Information

Enter your personal information below.

*First Name: John	Middle Name:
*Last Name: Miller	Suffix (Jr., Sr., etc.):
*Email Address: openpayments@yopmail.com	*Business Phone: 999-999-9999 555-555-5555

Cancel Back **Continue**

Open Payments User Guide

Step 8: You may choose to nominate additional users to fill the authorized official or authorized representative roles. To do so, select “Add” to nominate any additional individual(s).

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Teaching Hospital: Search
 - Register Teaching Hospital
 - Your Role
 - Nominate Roles**
- Personal Information
- Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Nominate Roles

A field with an asterisk (*) is required.

The Teaching Hospitals can have up to 10 active authorized users in the role of authorized official or authorized representative. There can be a maximum of 5 authorized official(s) per teaching hospital. These users will be allowed to perform certain actions on behalf of the teaching hospital in the Open Payments system.

Each nominated authorized representative will receive an email notifying them of their nomination to serve as a representative for a teaching hospital. The nominee must confirm the role or reject the nomination. If the nominee accepts the role, he or she will be prompted to create an individual profile in the Open Payments system. If the nominee does not accept the role, another person may be nominated.

Note: Nominees must register in Enterprise Identity Management (EIDM) to obtain login credentials prior to accepting or rejecting the role in the Open Payments system.

Add Nominee

Nominations can be made now or later, by selecting "Add" You will be asked to provide the nominee's personal and contact information. A summary of the actions associated with each user role is referenced below.

The nominee will have 10 business days to accept or reject the role. After 10 business days, the nomination will be deactivated.

User Role Description:

- Authorized Official:** Responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.
- Authorized Representative:** Granted permission by the teaching hospital's authorized official to access/review data, initiate a dispute on behalf of the teaching hospital and make/approve nominations for other users.

Role:	Name:	Business Email:	Business Phone Number:	Actions:
Authorized Official	John Miller	openpayments@yopmail.com	555-555-5555	(YOU)

Add

Open Payments User Guide

Step 8a: Enter the required information for one individual and select either “Authorized Official” or “Authorized Representative” to nominate the individual for the selected role. Information on teaching hospital user roles is available in Section 6.4b. When you have entered the information, select “Add.”

Repeat the process until you have entered all of the individuals you wish to nominate. A teaching hospital may have up to 10 unique active users, 5 of whom can hold the role of authorized official. When you have added all of the individuals you wish to nominate, select “Continue.”

Each nominated individual will receive an email notifying them of their nomination. The nominee must confirm or reject the role within 10 calendar days.

You do not have to nominate additional individuals during initial registration. You can nominate individuals later by updating your teaching hospital profile within the “Manage Teaching Hospitals” tab.

If you choose not to add nominees at this time, select “Continue” without adding any nominee information.

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
 - ② Teaching Hospital: Search
 - Register Teaching Hospital
 - Your Role
 - Nominate Roles
 - ③ Personal Information
 - ④ Review and Submit Profile
-
-  Access the Open Payments User Guide
 -  Need help with the website? Contact Us by email
 -  Review the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Nominate Roles

A field with an asterisk (*) is required.

The Teaching Hospitals can have up to 10 active authorized users in the role of authorized official or authorized representative. There can be a maximum of 5 authorized official(s) per teaching hospital. These users will be allowed to perform certain actions on behalf of the teaching hospital in the Open Payments system.

Each nominated authorized representative will receive an email notifying them of their nomination to serve as a representative for a teaching hospital. The nominee must confirm the role or reject the nomination. If the nominee accepts the role, he or she will be prompted to create an individual profile in the Open Payments system. If the nominee does not accept the role, another person may be nominated.

Note: Nominees must register in Enterprise Identity Management (EIDM) to obtain login credentials prior to accepting or rejecting the role in the Open Payments system.

Add Nominee

Nominations can be made now or later, by selecting "Add" You will be asked to provide the nominee's personal and contact information. A summary of the actions associated with each user role is referenced below.

The nominee will have 10 business days to accept or reject the role. After 10 business days, the nomination will be deactivated.

User Role Description:

- **Authorized Official:** Responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.
- **Authorized Representative:** Granted permission by the teaching hospital's authorized official to access/review data, initiate a dispute on behalf of the teaching hospital and make/approve nominations for other users.

Role:	Name:	Business Email:	Business Phone Number:	Actions:
Authorized Official	John Miller	openpayments@yopmail.com	555-555-5555	(YOU)

Nominee Information

*First Name: Middle Name:

*Last Name: Suffix (Jr., Sr., etc.):

*Email Address: *Business Phone Number:

*Job Title:

*Indicate the role this person will have:

Authorized Official: Responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.

Authorized Representative: Granted permission by the teaching hospital's authorized official to access/review data, initiate a dispute on behalf of the teaching hospital and make/approve nominations for other users.

Business Address:

*Business Address, Line 1:

Business Address, Line 2:

*City Name: *State: *Zip Code:

Open Payments User Guide

If you entered any nominees, you will see the nominee information displayed on the page. Confirm the information and when complete select "Continue."

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ② Teaching Hospital: Search
 - Register Teaching Hospital
 - Your Role
 - Nominate Roles**
- ③ Personal Information
- ④ Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Nominate Roles

A field with an asterisk (*) is required.

Confirmation: Your nominee has been successfully added.

The Teaching Hospitals can have up to 10 active authorized users in the role of authorized official or authorized representative. There can be a maximum of 5 authorized official(s) per teaching hospital. These users will be allowed to perform certain actions on behalf of the teaching hospital in the Open Payments system.

Each nominated authorized representative will receive an email notifying them of their nomination to serve as a representative for a teaching hospital. The nominee must confirm the role or reject the nomination. If the nominee accepts the role, he or she will be prompted to create an individual profile in the Open Payments system. If the nominee does not accept the role, another person may be nominated.

Note: Nominees must register in Enterprise Identity Management (EIDM) to obtain login credentials prior to accepting or rejecting the role in the Open Payments system.

Add Nominee

Nominations can be made now or later, by selecting "Add" You will be asked to provide the nominee's personal and contact information. A summary of the actions associated with each user role is referenced below.

The nominee will have 10 business days to accept or reject the role. After 10 business days, the nomination will be deactivated.

User Role Description:

- **Authorized Official:** Responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.
- **Authorized Representative:** Granted permission by the teaching hospital's authorized official to access/review data, initiate a dispute on behalf of the teaching hospital and make/approve nominations for other users.

Role:	Name:	Business Email:	Business Phone Number:	Actions:
Authorized Official	John Miller	openpayments@yopmail.com	555-555-5555	(YOU)
Authorized Official	Karen Miller	openpayments@yopmail.com	555-555-5555	Edit Delete

[Add](#) [Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

Step 9: Enter your personal information. When finished, select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Teaching Hospital: Search
- Personal Information**
- Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

3 Personal Information

A field with an asterisk (*) is required.

Add the requested personal and business information to your user profile. Also, review any pre-populated information for accuracy and correct any invalid information.

Note that changes made here will **not** automatically update your profile information in your other CMS accounts, such as your Medicare, National Plan & Provider Enumeration System (NPPES), or Enterprise Identity Management (EIDM) accounts.

Your Name

*First Name:	*Last Name:
John	Miller
Middle Name:	Suffix (Jr., Sr., etc.):

Business Address

*Job Title:		
Director		
*Business Email Address:	*Business Telephone Number:	
openpayments@yopmail.com	999-999-9999 555-555-5555	
*Business Address, Line 1:		
7500 Security Blvd		
Business Address, Line 2:		
*City Name:	*State:	Zip Code:
Baltimore	Maryland	99999 9999 21244

Cancel Back Continue

Open Payments User Guide

Step 10: Review your profile information on the “Review and Submit Profile” page. Select the “Back” button at the bottom of the page to go back and edit any information. Once you have reviewed the information and determined it to be correct, select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ✓ Teaching Hospital: Search
- ✓ Personal Information
- 4 Review and Submit Profile**

- Access the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

4 Review and Submit Profile

Review the information entered in the previous sections.

Select “Back” to navigate to the previous page(s) and correct any incorrect information. Select “Continue” to submit your profile.

ABCDE Teaching Hospital

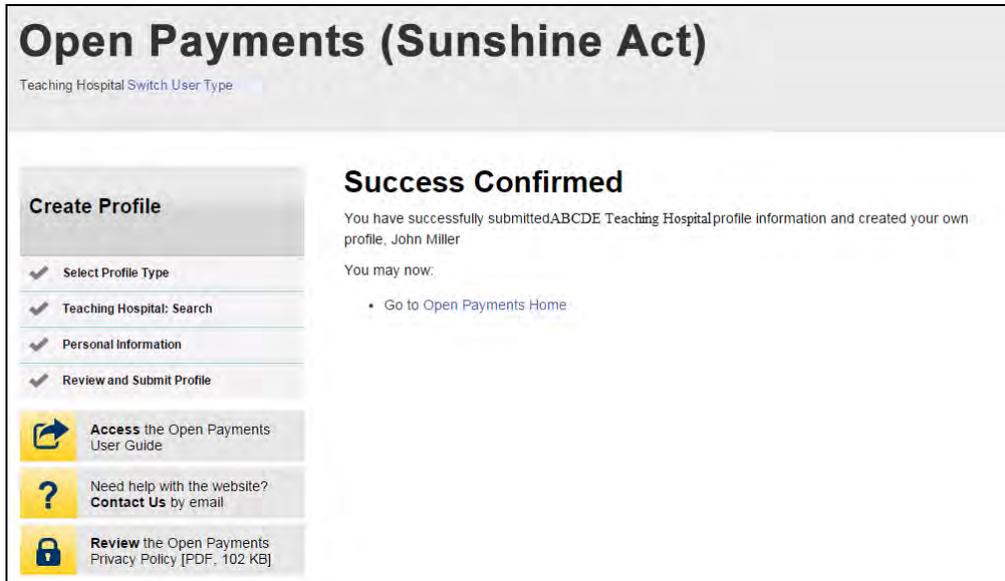
Teaching Hospital Business Address:	7500 Security Blvd Baltimore MD 21244
Taxpayer Identification Number (TIN):	123456789
Your Role:	Authorized Official
First Name:	John
Middle Name:	
Last Name:	Miller
Suffix (Jr., Sr., etc.):	
Business Email Address:	openpayments@yopmail.com
Business Telephone Number:	555-555-5555
Job Title:	Director
Business Address, Line 1:	7500 Security Blvd
Business Address, Line 2:	
City Name:	Baltimore
State:	Maryland
Zip Code:	21244

Nominations:

Role:	First Name:	Last Name:	Business Email Address:	Business Telephone Number:
Authorized Official	John	Miller	openpayments@yopmail.com	555-555-5555
Authorized Official	Karen	Miller	openpayments@yopmail.com	555-555-5555

Open Payments User Guide

The following message will appear on-screen to confirm your profile has been successfully created. You will have immediate access to the teaching hospital data. If you nominated additional individuals for user roles, an email notification is sent to the nominees that will instruct them on their next steps.



6.3e: Registering a Teaching Hospital (Returning System Users)

If you are a returning user registering an additional teaching hospital in the Open Payments system, follow the steps below.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page. Select the “Manage Teaching Hospitals” tab.



Open Payments User Guide

Step 2: From the “Manage Teaching Hospitals” tab, select, “Register New Teaching Hospital.”

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

Manage Teaching Hospitals

Below are the teaching hospitals with which you are affiliated. To view details and manage user roles, select a teaching hospital from the list below. You may also register a new teaching hospital by selecting “Register New Teaching Hospital.”

[Register New Teaching Hospital](#)

Your Teaching Hospitals

Doing Business As (DBA) Name	TIN	Address	Status
ABCDE Teaching Hospital	23-4567890	7500 Security Blvd Baltimore MD 21244	Registered

Access the Open Payments User Guide
Need help with the website? Contact Us by email
Review the Open Payments Privacy Policy [PDF, 102 KB]

Step 3: Search for the teaching hospital by selecting the appropriate state, teaching hospital name, teaching hospital business address, and Taxpayer Identification Number (TIN) from the drop-downs and select “Search.”

If your teaching hospital is not found, select “Register for Prior Program Year” to search for your teaching hospital using teaching hospital information from a previous program year. If you can find your teaching hospital only in a prior program year, you may select the teaching hospital and proceed with registration. For instructions on registering a teaching hospital for a prior program year, see Section 6.3f.

If your teaching hospital cannot be found in any program year, contact the Open Payments Help Desk at openpayments@cms.hhs.gov for assistance.

Teaching hospitals must be registered using the hospital’s “Doing Business As” name as the hospital name. In the CMS Teaching Hospital List, the “Doing Business As” name is under the heading of “Hospital Name.” (Note that this differs if you register the teaching hospital for program year 2013 only. Refer to Section 6.3f for detailed information on registering a teaching hospital for a prior program year.) The address selected should be the address listed in the CMS Teaching Hospital List as the hospital’s “NPPES Business Address.”

Teaching hospitals are pre-populated into the Open Payments system based on the 2015 Open Payments Teaching Hospital List. Teaching hospitals not on this list or prior program year lists will not have payments or other transfers of value reported about them.

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**

Create Profile

Select Profile Type

- ② Teaching Hospital: Search
- ③ Personal Information
- ④ Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? **Contact Us** by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Search

A field with an asterisk (*) is required.

To register your teaching hospital for the current program year, select the correct information from each of the dropdown fields below and select "Search." If your teaching hospital is not listed in the search results, select "Register for Prior Program Year" to continue with registration.

The teaching hospital list is updated annually by CMS. The teaching hospital list for the current program year, along with the list for previous program years, can be found on the [CMS Open Payments website](#). If you do not find your teaching hospital listed, contact the Open Payments Help Desk at (openpayments@cms.hhs.gov) for assistance.

The user who registers a teaching hospital in the Open Payments system must take the role of authorized official for that hospital. The authorized official is responsible for registering the teaching hospital in the Open Payments system. The authorized official may also nominate other users, modify existing user roles, approve or deny nominations made by others, and approve or deny requests for user roles made by others.

Note: If you are a physician who is affiliated with a teaching hospital, you may proceed to view payments made to this teaching hospital, however you must also register as a physician to view payments made to you as a physician.

[Register for Prior Program Year](#)

*** State Where Teaching Hospital is Located:** Maryland

*** Teaching Hospital Doing Business As Name:** DEFG Teaching Hospital

*** Taxpayer Identification Number (TIN):** 345678901

*** Teaching Hospital Business Address:** 7500 Security Blvd Baltimore MD 21244

Search (circled in red)

Cancel | Back

Open Payments User Guide

Step 4: Review the information displayed on the page, and select “Continue” if the information displayed is the teaching hospital you wish to register. If this is not the correct teaching hospital, select the “Back” button at the bottom of the page to return to the previous page and re-enter the information.

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

Create Profile

Select Profile Type

- 2 Teaching Hospital: Search
- 3 Personal Information
- 4 Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Search

A field with an asterisk (*) is required.

To register your teaching hospital for the current program year, select the correct information from each of the dropdown fields below and select “Search.” If your teaching hospital is not listed in the search results, select “Register for Prior Program Year” to continue with registration.

The teaching hospital list is updated annually by CMS. The teaching hospital list for the current program year, along with the list for previous program years, can be found on the CMS Open Payments website. If you do not find your teaching hospital listed, contact the Open Payments Help Desk at (openpayments@cms.hhs.gov) for assistance.

The user who registers a teaching hospital in the Open Payments system must take the role of authorized official for that hospital. The authorized official is responsible for registering the teaching hospital in the Open Payments system. The authorized official may also nominate other users, modify existing user roles, approve or deny nominations made by others, and approve or deny requests for user roles made by others.

Note: If you are a physician who is affiliated with a teaching hospital, you may proceed to view payments made to this teaching hospital, however you must also register as a physician to view payments made to you as a physician.

Register for Prior Program Year

*State Where Teaching Hospital is Located: Maryland

*Teaching Hospital Doing Business As Name: DEFG Teaching Hospital

*Taxpayer Identification Number (TIN): 345678901

*Teaching Hospital Business Address: 7500 Security Blvd Baltimore MD 21244

Search

Teaching Hospital Search Results

This teaching hospital is not yet registered in the Open Payments system:

DEFG Teaching Hospital
7500 Security Blvd
Baltimore, MD 21244
TIN: 345678901

If you wish to serve as an authorized official for the teaching hospital, select “Continue” to register the teaching hospital in the Open Payments system.

Cancel | Back | Continue

Open Payments User Guide

Step 5: Review the information displayed on the page and select “Continue.”

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

Create Profile

- Select Profile Type
- Teaching Hospital: Search
 - Register Teaching Hospital (Your Role)
 - Nominate Roles
- Personal Information
- Review and Submit Profile

Access the Open Payments User Guide | Need help with the website? Contact Us by email | Review the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Register Teaching Hospital

Review the teaching hospital information below to ensure this is the correct teaching hospital you wish to register. To proceed with registering this teaching hospital, select “Continue.” To select different search criteria and search for another teaching hospital, select “Back.”

DEFG Teaching Hospital

Business Address: 7500 Security Blvd, Baltimore, MD 21244 | **Taxpayer Identification Number (TIN):** 345678901

Cancel | Back | **Continue**

Step 6: Review the information generated by the system related to your role. You must select the role of “Authorized Official” for yourself to proceed with registration. Information on teaching hospital user roles is available in Section 6.4b.

First name, last name, email address, and business phone should be pre-populated with information from your EIDM profile. Edit these fields as necessary. All required fields will be marked with an asterisk(*). You will not be able to proceed with registration until all of the required fields have been entered. When complete, select “Continue.”

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

Create Profile

- Select Profile Type
- Teaching Hospital: Search
 - Register Teaching Hospital (Your Role)
 - Nominate Roles
- Personal Information
- Review and Submit Profile

Access the Open Payments User Guide | Need help with the website? Contact Us by email | Review the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Your Role

A field with an asterisk (*) is required.

To register a teaching hospital, you must have the role of authorized official of the teaching hospital.

Authorized officials are responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.

Your Role-Related Information

Enter your personal information below:

*First Name: James | Middle Name: | *Last Name: Jones | Suffix (Jr., Sr., etc.): | *Email Address: openpayments@yopmail.com | *Business Phone: 999-999-9999 | 555-555-5555

Cancel | Back | **Continue**

Open Payments User Guide

Step 7: You may choose to nominate additional users to fill the authorized official or authorized representative roles. To do so, select “Add” to nominate any additional individual(s).

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

Create Profile

- ✔ Select Profile Type
- ② Teaching Hospital: Search
 - Register Teaching Hospital
 - Your Role
 - Nominate Roles**
- ③ Personal Information
- ④ Review and Submit Profile

[Access the Open Payments User Guide](#)

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

[Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)

2 Teaching Hospital: Nominate Roles

A field with an asterisk (*) is required.

The Teaching Hospitals can have up to 10 active authorized users in the role of authorized official or authorized representative. There can be a maximum of 5 authorized official(s) per teaching hospital. These users will be allowed to perform certain actions on behalf of the teaching hospital in the Open Payments system.

Each nominated authorized representative will receive an email notifying them of their nomination to serve as a representative for a teaching hospital. The nominee must confirm the role or reject the nomination. If the nominee accepts the role, he or she will be prompted to create an individual profile in the Open Payments system. If the nominee does not accept the role, another person may be nominated.

Note: Nominees must register in Enterprise Identity Management (EIDM) to obtain login credentials prior to accepting or rejecting the role in the Open Payments system.

Add Nominee

Nominations can be made now or later, by selecting "Add" You will be asked to provide the nominee's personal and contact information. A summary of the actions associated with each user role is referenced below.

The nominee will have 10 business days to accept or reject the role. After 10 business days, the nomination will be deactivated.

User Role Description:

- **Authorized Official:** Responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.
- **Authorized Representative:** Granted permission by the teaching hospital's authorized official to access/review data, initiate a dispute on behalf of the teaching hospital and make/approve nominations for other users.

Role:	Name:	Business Email:	Business Phone Number:	Actions:
Authorized Official	James Jones	openpayments@yopmail.com	555-555-5555	(YOU)

Add

Open Payments User Guide

Step 7a: Enter the required information for one individual and select either “Authorized Official” or “Authorized Representative” to nominate the individual for the selected role. Information on teaching hospital user roles is available in Section 6.4b. When you have entered the information, select “Add.”

Repeat the process until you have entered all of the individuals you wish to nominate. A teaching hospital may have up to 10 active users, 5 of whom can hold the role of authorized official. When you have added all of the individuals you wish to nominate, select “Continue.”

Each nominated individual will receive an email notifying them of their nomination. The nominee must confirm or reject the role within 10 calendar days.

You do not have to nominate additional individuals during initial registration. You can nominate individuals later by updating your teaching hospital profile within the “Manage Teaching Hospitals” tab.

If you choose not to add nominees at this time, select “Continue” without adding any nominee information.

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

Create Profile

- Select Profile Type
- Teaching Hospital: Search
- Register Teaching Hospital
- Your Role
- Nominate Roles
- Personal Information
- Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? [Contact Us](#) by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Nominate Roles

A field with an asterisk (*) is required.

The Teaching Hospitals can have up to 10 active authorized users in the role of authorized official or authorized representative. There can be a maximum of 5 authorized official(s) per teaching hospital. These users will be allowed to perform certain actions on behalf of the teaching hospital in the Open Payments system.

Each nominated authorized representative will receive an email notifying them of their nomination to serve as a representative for a teaching hospital. The nominee must confirm the role or reject the nomination. If the nominee accepts the role, he or she will be prompted to create an individual profile in the Open Payments system. If the nominee does not accept the role, another person may be nominated.

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Add Nominee

Nominations can be made now or later, by selecting "Add". You will be asked to provide the nominee's personal and contact information. A summary of the actions associated with each user role is referenced below.

The nominee will have 10 business days to accept or reject the role. After 10 business days, the nomination will be deactivated.

User Role Description:

- Authorized Official:** Responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.
- Authorized Representative:** Granted permission by the teaching hospital's authorized official to access/review data, initiate a dispute on behalf of the teaching hospital and make/approve nominations for other users.

Role:	Name:	Business Email:	Business Phone Number:	Actions:
Authorized Official	Jordan Jones	openpayments@yopmail.com	655-555-5555	(YOU)

Nominee Information

*First Name: Middle Name:

*Last Name: Suffix (Jr., Sr., etc.):

*Email Address: *Business Phone Number:

*Job Title:

*Indicate the role this person will have:

Authorized Official: Responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.

Authorized Representative: Granted permission by the teaching hospital's authorized official to access/review data, initiate a dispute on behalf of the teaching hospital and make/approve nominations for other users.

Business Address:

*Business Address, Line 1:

Business Address, Line 2:

*City Name: *State: *Zip Code:

Open Payments User Guide

If you entered any nominees, you will see the nominee information displayed on the page. Confirm the information and when complete select "Continue."

Open Payments (Sunshine Act)

Teaching Hospital [Switch User Type](#)

[Home](#) [Review and Dispute](#) [Manage Teaching Hospitals](#) [My Profile](#) [Help](#)
Review, Affirm, Dispute Register, Edit, Nominate Roles Account, Roles, Nominations

Create Profile

- Select Profile Type
- Teaching Hospital: Search
 - Register Teaching Hospital
 - Your Role
 - Nominate Roles**
- Personal Information
- Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? [Contact Us](#) by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Nominate Roles

A field with an asterisk (*) is required.

Confirmation: Your nominee has been successfully added.

The Teaching Hospitals can have up to 10 active authorized users in the role of authorized official or authorized representative. There can be a maximum of 5 authorized official(s) per teaching hospital. These users will be allowed to perform certain actions on behalf of the teaching hospital in the Open Payments system.

Each nominated authorized representative will receive an email notifying them of their nomination to serve as a representative for a teaching hospital. The nominee must confirm the role or reject the nomination. If the nominee accepts the role, he or she will be prompted to create an individual profile in the Open Payments system. If the nominee does not accept the role, another person may be nominated.

Note: Nominees must register in Enterprise Identity Management (EIDM) to obtain login credentials prior to accepting or rejecting the role in the Open Payments system.

Add Nominee

Nominations can be made now or later, by selecting "Add" You will be asked to provide the nominee's personal and contact information. A summary of the actions associated with each user role is referenced below.

The nominee will have 10 business days to accept or reject the role. After 10 business days, the nomination will be deactivated.

User Role Description:

- Authorized Official:** Responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.
- Authorized Representative:** Granted permission by the teaching hospital's authorized official to access/review data, initiate a dispute on behalf of the teaching hospital and make/approve nominations for other users.

Role:	Name:	Business Email:	Business Phone Number:	Actions:
Authorized Official	James Jones	openpayments@yopmail.com	555-555-5555	(YOU)
Authorized Official	Mary Davis	authorizedrep@yopmail.com	555-555-5555	Edit Delete

[Add](#) [Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

Step 8: Enter the required personal information. When finished, select “Continue.”

Open Payments (Sunshine Act)

Teaching Hospital Switch User Type

Home | Review and Dispute | **Manage Teaching Hospitals** | My Profile | Help

Register, Edit, Nominate, Roles

Account, Roles, Nominations

Create Profile

- Select Profile Type
- Teaching Hospital: Search
- 3 Personal Information**
- 4 Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

3 Personal Information

A field with an asterisk (*) is required.

Add the requested personal and business information to your user profile. Also, review any pre-populated information for accuracy and correct any invalid information.

Note that changes made here will **not** automatically update your profile information in your other CMS accounts, such as your Medicare, National Plan & Provider Enumeration System (NPPES), or Enterprise Identity Management (EIDM) accounts.

Your Name

*First Name: James | *Last Name: Jones

Middle Name: | Suffix (Jr., Sr., etc.):

Business Address

*Job Title: Authorized Official

*Business Email Address: openpayments@yopmail.com | *Business Telephone Number: 555-555-5555

*Business Address, Line 1: 7500 Security Blvd

Business Address, Line 2:

*City Name: Baltimore | *State: Maryland | *Zip Code: 21244

Cancel | Back | **Continue**

Open Payments User Guide

Step 9: Review your profile information on the “Review and Submit Profile” page. Select the “Back” button at the bottom of the page to go back and edit any information. Once you have reviewed the information and determined it to be correct, select “Continue.”

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](#)

Create Profile

- ✓ Select Profile Type
- ✓ Teaching Hospital: Search
- ✓ Personal Information
- Review and Submit Profile**

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

[Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)

4 Review and Submit Profile

Review the information entered in the previous sections.
Select “Back” to navigate to the previous page(s) and correct any incorrect information. Select “Continue” to submit your profile.

DEFG Teaching Hospital

Teaching Hospital Business Address:	7500 Security Blvd Baltimore, MD 21244
Taxpayer Identification Number (TIN):	345678901
Your Role:	Authorized Official
First Name:	James
Middle Name:	
Last Name:	Jones
Suffix (Jr., Sr., etc.):	
Business Email Address:	openpayments@yopmail.com
Business Telephone Number:	555-555-5555
Job Title:	Authorized Official
Business Address, Line 1:	7500 Security Blvd
Business Address, Line 2:	
City Name:	Baltimore
State:	Maryland
Zip Code:	21244

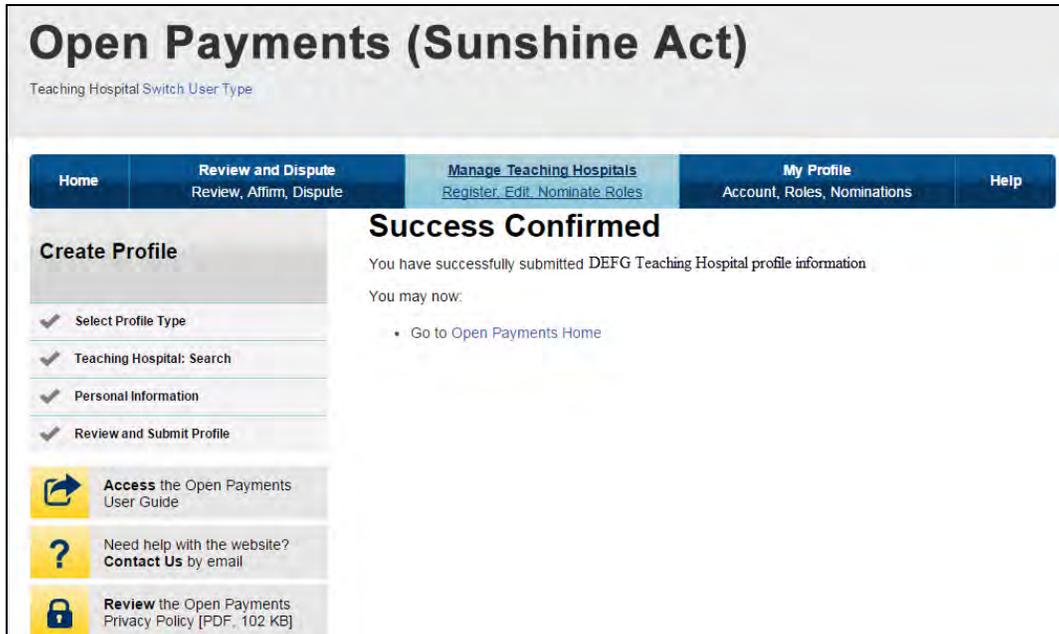
Nominations:

Role:	First Name:	Last Name:	Business Email Address:	Business Telephone Number:
Authorized Official	James	Jones	openpayments@yopmail.com	555-555-5555
Authorized Official	Mary	Davis	authorizedrep@yopmail.com	555-555-5555

[Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

The following message will appear on-screen to confirm your profile has been successfully created. You will have immediate access to the teaching hospital data. If you nominated additional individuals for user roles, an email notification will be sent to the nominees that will instruct them on their next steps.



6.3f Registering a Teaching Hospital (Prior Program Year)

If you wish to register a teaching hospital in Open Payments that does **not** appear on the current program year's CMS Teaching Hospital List, but **does** appear in previous Teaching Hospital Lists, you can register the hospital for a prior program year. Doing so will allow you to view records associated with that teaching hospital from a prior program year.

If your teaching hospital is already registered in the Open Payments system, you do not need to re-register the teaching hospital for the prior program year.

If your teaching hospital does not appear in any CMS Teaching Hospital Lists, it will not have any records associated with it in the Open Payments system and cannot be registered.

To register your teaching hospital for a prior program year, follow these steps:

Open Payments User Guide

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page. Select the “Manage Teaching Hospitals” tab.

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
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Welcome to the Open Payments System

Announcements

2015 Program Year General Information - Review and dispute functionality in the Open Payments system is unavailable until April 2016. CMS will announce the beginning of the review and dispute period via the Open Payments listserv.

You may register or affiliate yourself with a teaching hospital, accept or request nominations, and review your profile information. Resources to complete these actions are located on the Resources page of the Open Payments website.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

You can manage your user profile and perform the actions associated with your profile.

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Step 2: On the “Manage Teaching Hospitals” page, select “Register New Teaching Hospital.”

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

Manage Teaching Hospitals

Below are the teaching hospitals with which you are affiliated. To view details and manage user roles, select a teaching hospital from the list below. You may also register a new teaching hospital by selecting “Register New Teaching Hospital.”

Register New Teaching Hospital

Your Teaching Hospitals

Doing Business As (DBA) Name	TIN	Address	Status
ABCDE Teaching Hospital	23-4567890	7500 Security Blvd Baltimore MD 21244	Registered

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 3: On the “Teaching Hospital: Search” page, select the link “Register for Prior Program Year.”

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
----------------------	---------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------	----------------------

Create Profile

Select Profile Type

- ② **Teaching Hospital: Search**
- ③ Personal Information
- ④ Review and Submit Profile

- Access** the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review** the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Search

A field with an asterisk (*) is required.

To register your teaching hospital for the current program year, select the correct information from each of the dropdown fields below and select “Search.” If your teaching hospital is not listed in the search results, select “Register for Prior Program Year” to continue with registration.

The teaching hospital list is updated annually by CMS. The [teaching hospital list](#) for the current program year, along with the list for previous program years, can be found on the [CMS Open Payments website](#). If you do not find your teaching hospital listed, contact the Open Payments Help Desk at openpayments@cms.hhs.gov for assistance.

The user who registers a teaching hospital in the Open Payments system must take the role of authorized official for that hospital. The authorized official is responsible for registering the teaching hospital in the Open Payments system. The authorized official may also nominate other users, modify existing user roles, approve or deny nominations made by others, and approve or deny requests for user roles made by others.

Note: If you are a physician who is affiliated with a teaching hospital, you may proceed to view payments made to this teaching hospital, however you must also register as a physician to view payments made to you as a physician.

 [Register for Prior Program Year](#)

* **State Where Teaching Hospital is Located:**
Select the state...

* **Teaching Hospital Doing Business As Name:**
Select the teaching hospital DBA name...

* **Taxpayer Identification Number (TIN):**
Please Select TIN

* **Teaching Hospital Business Address:**
Please select hospital NPPES business address

Open Payments User Guide

Step 4: Teaching hospitals are pre-populated in the Open Payments system based on the Teaching Hospital List for the program year you selected. Teaching hospitals not found in any program year will not have payments or other transfers of value reported about them for that program year.

Search for the teaching hospital by selecting the program year you wish to register the hospital for, as well as the state, teaching hospital name, teaching hospital business address, and Taxpayer Identification Number (TIN) from the drop-downs and select “Search.”

Teaching hospitals must be registered using the hospital’s “Doing Business As” name as the hospital name. In the CMS Teaching Hospital List, the “Doing Business As” name is under the heading of “Hospital Name.” (Note that this differs if you register the teaching hospital for program year 2013 only. Refer to Section 6.3f for detailed information on registering a teaching hospital for a prior program year.)

The address selected should be the address listed in the CMS Teaching Hospital List as the hospital’s “NPPES Business Address.”

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

Create Profile

Select Profile Type

- Teaching Hospital: Search
- Personal Information
- Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Search

A field with an asterisk (*) is required.

To register your teaching hospital for the current program year, select the correct information from each of the dropdown fields below and select “Search.” If your teaching hospital is not listed in the search results, select “Register for Prior Program Year” to continue with registration.

The teaching hospital list is updated annually by CMS. The teaching hospital list for the current program year, along with the list for previous program years, can be found on the CMS Open Payments website. If you do not find your teaching hospital listed, contact the Open Payments Help Desk at openpayments@cms.hhs.gov for assistance.

The user who registers a teaching hospital in the Open Payments system must take the role of authorized official for that hospital. The authorized official is responsible for registering the teaching hospital in the Open Payments system. The authorized official may also nominate other users, modify existing user roles, approve or deny nominations made by others, and approve or deny requests for user roles made by others.

Note: If you are a physician who is affiliated with a teaching hospital, you may proceed to view payments made to this teaching hospital, however you must also register as a physician to view payments made to you as a physician.

Prior Program Year : 2013

State Where Teaching Hospital is Located: Maryland

Teaching Hospital Doing Business As Name: XYZ Teaching Hospital

Taxpayer Identification Number (TIN): 456789012

Teaching Hospital Business Address: 7500 Security Blvd Baltimore MD 21244

Search

Cancel Back

Open Payments User Guide

Step 5: Review the information displayed on the page, and select “Continue” if the information displayed is the teaching hospital you wish to register. If this is not the correct teaching hospital, select the “Back” button at the bottom of the page to return to the previous page and re-enter the information.

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

Create Profile

Select Profile Type

- 2 Teaching Hospital: Search
- 3 Personal Information
- 4 Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Search

A field with an asterisk (*) is required.

To register your teaching hospital for the current program year, select the correct information from each of the dropdown fields below and select “Search.” If your teaching hospital is not listed in the search results, select “Register for Prior Program Year” to continue with registration.

The teaching hospital list is updated annually by CMS. The teaching hospital list for the current program year, along with the list for previous program years, can be found on the CMS Open Payments website. If you do not find your teaching hospital listed, contact the Open Payments Help Desk at (openpayments@cms.hhs.gov) for assistance.

The user who registers a teaching hospital in the Open Payments system must take the role of authorized official for that hospital. The authorized official is responsible for registering the teaching hospital in the Open Payments system. The authorized official may also nominate other users, modify existing user roles, approve or deny nominations made by others, and approve or deny requests for user roles made by others.

Note: If you are a physician who is affiliated with a teaching hospital, you may proceed to view payments made to this teaching hospital, however you must also register as a physician to view payments made to you as a physician.

*Prior Program Year: 2013

*State Where Teaching Hospital is Located: Maryland

*Teaching Hospital Doing Business As Name: XYZ Teaching Hospital

*Taxpayer Identification Number (TIN): 456789012

*Teaching Hospital Business Address: 7500 Security Blvd Baltimore MD 21244

Search

Teaching Hospital Search Results

This teaching hospital is not yet registered in the Open Payments system:

XYZ Teaching Hospital
7500 Security Blvd
Baltimore, MD 21244
TIN: 456789012

If you wish to serve as an authorized official for the teaching hospital, select “Continue” to register the teaching hospital in the Open Payments system.

Cancel Back Continue

Open Payments User Guide

Step 6: Review the teaching hospital information displayed on the page. When complete, select “Continue.”

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Teaching Hospital Switch User Type

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Create Profile

- Select Profile Type
- Teaching Hospital: Search
 - Register Teaching Hospital
 - Your Role
 - Nominate Roles
- Personal Information
- Review and Submit Profile

2 Teaching Hospital: Register Teaching Hospital

Review the teaching hospital information below to ensure this is the correct teaching hospital you wish to register. To proceed with registering this teaching hospital, select "Continue." To select different search criteria and search for another teaching hospital, select "Back."

XYZ Teaching Hospital

Business Address: 7500 Security Blvd, Baltimore, MD 21244

Taxpayer Identification Number (TIN): 456789012

Cancel | Back | Continue

Step 7: Review the information generated by the system related to your role. You must select the role of “Authorized Official” for yourself to proceed with registration. Information on teaching hospital user roles is available in Section 6.4b.

First name, last name, email address, and business phone should be pre-populated with information from your EIDM profile. Edit these fields as necessary. All required fields will be marked with an asterisk(*). You will not be able to proceed with registration until all of the required fields have been entered. When complete, select “Continue.”

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Create Profile

- Select Profile Type
- Teaching Hospital: Search
 - Register Teaching Hospital
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2 Teaching Hospital: Your Role

A field with an asterisk (*) is required.

To register a teaching hospital, you must have the role of authorized official of the teaching hospital.

Authorized officials are responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.

Your Role-Related Information

Enter your personal information below.

*First Name: James | Middle Name: T

*Last Name: Jones | Suffix (Jr., Sr., etc.):

*Email Address: openpayments@yopmail.com | *Business Phone: 999-999-9999

555-555-5555

Cancel | Back | Continue

Open Payments User Guide

Step 8: You may choose to nominate additional users to fill the authorized official or authorized representative roles. To do so, select “Add” to nominate any additional individual(s).

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2 Teaching Hospital: Nominate Roles

A field with an asterisk (*) is required.

The Teaching Hospitals can have up to 10 active authorized users in the role of authorized official or authorized representative. There can be a maximum of 5 authorized official(s) per teaching hospital. These users will be allowed to perform certain actions on behalf of the teaching hospital in the Open Payments system.

Each nominated authorized representative will receive an email notifying them of their nomination to serve as a representative for a teaching hospital. The nominee must confirm the role or reject the nomination. If the nominee accepts the role, he or she will be prompted to create an individual profile in the Open Payments system. If the nominee does not accept the role, another person may be nominated.

Note: Nominees must register in Enterprise Identity Management (EIDM) to obtain login credentials prior to accepting or rejecting the role in the Open Payments system.

Add Nominee

Nominations can be made now or later, by selecting "Add" You will be asked to provide the nominee's personal and contact information. A summary of the actions associated with each user role is referenced below.

The nominee will have 10 business days to accept or reject the role. After 10 business days, the nomination will be deactivated.

User Role Description:

- Authorized Official:** Responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.
- Authorized Representative:** Granted permission by the teaching hospital's authorized official to access/review data, initiate a dispute on behalf of the teaching hospital and make/approve nominations for other users.

Role:	Name:	Business Email:	Business Phone Number:	Actions:
Authorized Official	James Jones	openpayments@yopmail.com	555-555-5555	(YOU)

[Add](#) [Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

Step 8a: Enter the required information for one individual and select either “Authorized Official” or “Authorized Representative” to nominate the individual for the selected role. Information on teaching hospital user roles is available in Section 6.4b. When you have entered the information, select “Add.”

Repeat the process until you have entered all of the individuals you wish to nominate. A teaching hospital may have up to 10 active users, 5 of whom can hold the role of authorized official. When you have added all of the individuals you wish to nominate, select “Continue.”

Each nominated individual will receive an email notifying them of their nomination. The nominee must confirm or reject the role within 10 calendar days.

You do not have to nominate additional individuals during initial registration. You can nominate individuals later by updating your teaching hospital profile within the “Manage Teaching Hospitals” tab.

If you choose not to add nominees at this time, select “Continue” without adding any nominee information.

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- Your Role
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- Review and Submit Profile

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Review the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Nominate Roles

A field with an asterisk (*) is required.

The Teaching Hospitals can have up to 10 active authorized users in the role of authorized official or authorized representative. There can be a maximum of 5 authorized official(s) per teaching hospital. These users will be allowed to perform certain actions on behalf of the teaching hospital in the Open Payments system.

Each nominated authorized representative will receive an email notifying them of their nomination to serve as a representative for a teaching hospital. The nominee must confirm the role or reject the nomination. If the nominee accepts the role, he or she will be prompted to create an individual profile in the Open Payments system. If the nominee does not accept the role, another person may be nominated.

Note: Nominees must register in Enterprise Identity Management (EIDM) to obtain login credentials prior to accepting or rejecting the role in the Open Payments system.

Add Nominee

Nominations can be made now or later, by selecting "Add." You will be asked to provide the nominee's personal and contact information. A summary of the actions associated with each user role is referenced below.

The nominee will have 10 business days to accept or reject the role. After 10 business days, the nomination will be deactivated.

User Role Description:

- Authorized Official:** Responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.
- Authorized Representative:** Granted permission by the teaching hospital's authorized official to access/review data, initiate a dispute on behalf of the teaching hospital and make/approve nominations for other users.

Role:	Name:	Business Email:	Business Phone Number:	Actions:
Authorized Official	James Jones	openpayments@yopmail.com	555-555-5555	(YOU)

Nominee Information

*First Name: Middle Name:

Last Name: Suffix (Jr., Sr., etc.):

*Email Address: *Business Phone Number:

*Job Title:

Indicate the role this person will have:

- Authorized Official:** Responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.
- Authorized Representative:** Granted permission by the teaching hospital's authorized official to access/review data, initiate a dispute on behalf of the teaching hospital and make/approve nominations for other users.

Business Address:

*Business Address, Line 1:

Business Address, Line 2:

*City Name: *State: *Zip Code:

Open Payments User Guide

If you entered any nominees, you will see the nominee information displayed on the page. Confirm the information and when complete select "Continue."

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Create Profile

- Select Profile Type
- Teaching Hospital: Search
 - Register Teaching Hospital
 - Your Role
 - Nominate Roles**
- Personal Information
- Review and Submit Profile

[Access the Open Payments User Guide](#)

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

[Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)

2 Teaching Hospital: Nominate Roles

A field with an asterisk (*) is required.

Confirmation: Your nominee has been successfully added.

The Teaching Hospitals can have up to 10 active authorized users in the role of authorized official or authorized representative. There can be a maximum of 5 authorized official(s) per teaching hospital. These users will be allowed to perform certain actions on behalf of the teaching hospital in the Open Payments system.

Each nominated authorized representative will receive an email notifying them of their nomination to serve as a representative for a teaching hospital. The nominee must confirm the role or reject the nomination. If the nominee accepts the role, he or she will be prompted to create an individual profile in the Open Payments system. If the nominee does not accept the role, another person may be nominated.

Note: Nominees must register in Enterprise Identity Management (EIDM) to obtain login credentials prior to accepting or rejecting the role in the Open Payments system.

Add Nominee

Nominations can be made now or later, by selecting "Add" You will be asked to provide the nominee's personal and contact information. A summary of the actions associated with each user role is referenced below.

The nominee will have 10 business days to accept or reject the role. After 10 business days, the nomination will be deactivated.

User Role Description:

- Authorized Official:** Responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.
- Authorized Representative:** Granted permission by the teaching hospital's authorized official to access/review data, initiate a dispute on behalf of the teaching hospital and make/approve nominations for other users.

Role:	Name:	Business Email:	Business Phone Number:	Actions:
Authorized Official	James Jones	openpayments@yopmail.com	555-555-5555	(YOU)
Authorized Official	Mary Davis	openpayments@yopmail.com	555-555-5555	Edit Delete

[Add](#) [Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

Step 9: Enter your personal information. When finished, select “Continue.”

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- Select Profile Type
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Review the Open Payments Privacy Policy [PDF, 102 KB]

3 Personal Information

A field with an asterisk (*) is required.

Add the requested personal and business information to your user profile. Also, review any pre-populated information for accuracy and correct any invalid information.

Note that changes made here will **not** automatically update your profile information in your other CMS accounts, such as your Medicare, National Plan & Provider Enumeration System (NPES), or Enterprise Identity Management (EIDM) accounts.

Your Name

*First Name: James *Last Name: Jones

Middle Name: Suffix (Jr., Sr., etc.):

Business Address

*Job Title: Authorized Official

*Business Email Address: openpayments@yopmail.com *Business Telephone Number: 999-999-9999
555-555-5555

*Business Address, Line 1: 7500 Security Blvd

Business Address, Line 2:

*City Name: Baltimore *State: Maryland *Zip Code: 99999 9999
21244

Cancel Back **Continue**

Open Payments User Guide

Step 10: Review your profile information on the “Review and Submit Profile” page. Select the “Back” button at the bottom of the page to go back and edit any information. Once you have reviewed the information and determined it to be correct, select “Continue.”

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](#)

Create Profile

- ✓ Select Profile Type
- ✓ Teaching Hospital: Search
- ✓ Personal Information
- 4 Review and Submit Profile**

- Access** the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review** the Open Payments Privacy Policy [PDF, 102 KB]

4 Review and Submit Profile

Review the information entered in the previous sections.
Select “Back” to navigate to the previous page(s) and correct any incorrect information. Select “Continue” to submit your profile.

XYZ Teaching Hospital

Teaching Hospital Business Address: 7500 Security Blvd
Baltimore MD 21244

Taxpayer Identification Number (TIN): 456789012

Your Role: Authorized Official

First Name: James

Middle Name:

Last Name: Jones

Suffix (Jr., Sr., etc.):

Business Email Address: openpayments@yopmail.com

Business Telephone Number: 555-555-5555

Job Title: Authorized Official

Business Address, Line 1: 7500 Security Blvd

Business Address, Line 2:

City Name: Baltimore

State: Maryland

Zip Code: 21244

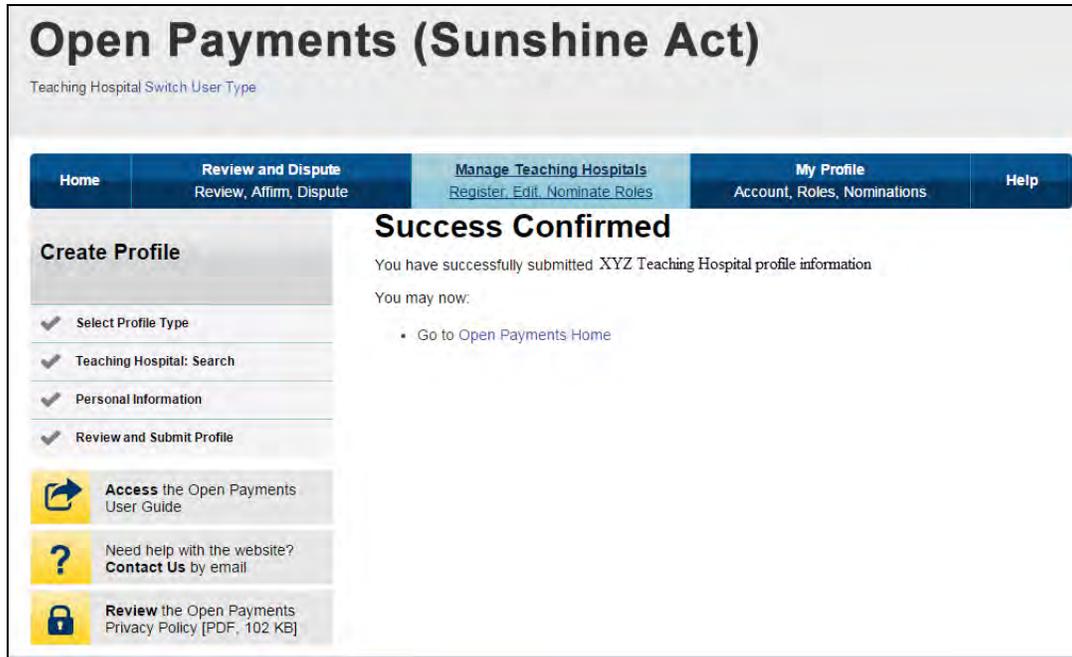
Nominations:

Role:	First Name:	Last Name:	Business Email Address:	Business Telephone Number:
Authorized Official	James	Jones	openpayments@yopmail.com	555-555-5555
Authorized Official	Mary	Davis	openpayments@yopmail.com	555-555-5555

[Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

The following message will appear on-screen to confirm the hospital has been successfully registered. You will have immediate access to the teaching hospital data. If you nominated individuals for user roles, an email notification is sent to the nominees that will instruct them on their next steps.



6.3g: Using the Switch User Functionality

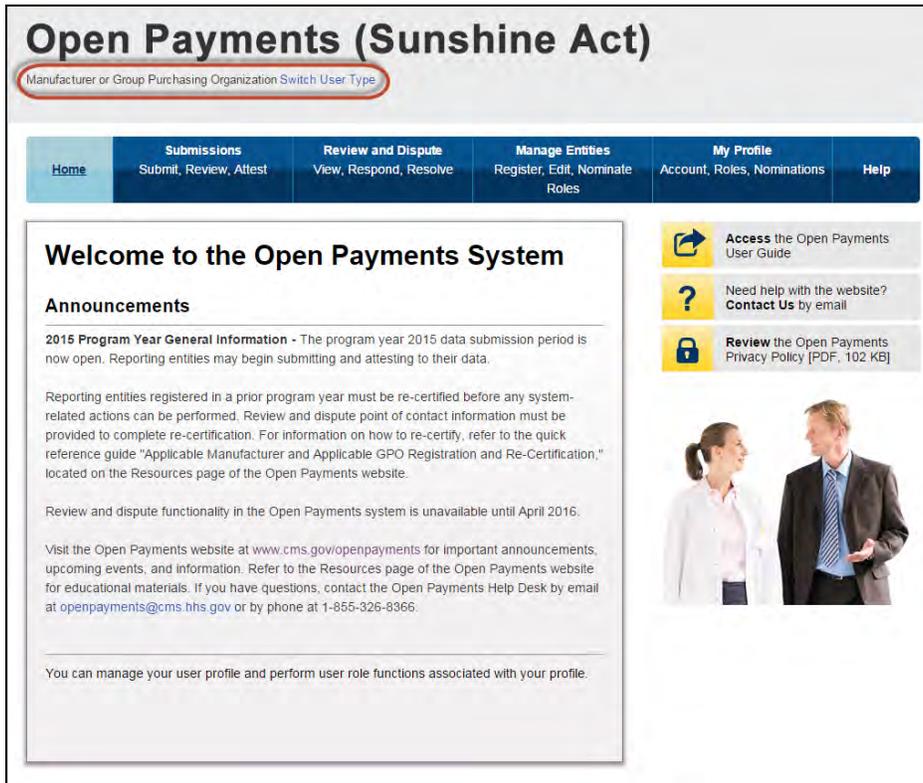
The Open Payments system allows individuals to hold multiple user roles based on their affiliations with multiple entities. Users can switch among the applicable manufacturer/applicable GPO, physician, and teaching hospital user types through a “Switch User Type” functionality. Once a user has successfully registered within the Open Payments system under any user type (reporting entity, physician, or teaching hospital), the “Switch User Type” functionality will become available. The pages in the Open Payments system will look similar for each user type, though the actions available will change depending on the user type you are operating under at that time.

All users have access to the “Switch User Type” functionality. Users who have only a single user type can use the functionality to request roles for and/or register as another user type.

Follow these steps to switch between user types or request a role as another user type in the Open Payments system:

Open Payments User Guide

Step 1: At the very top of the page, select “Switch User Type.”

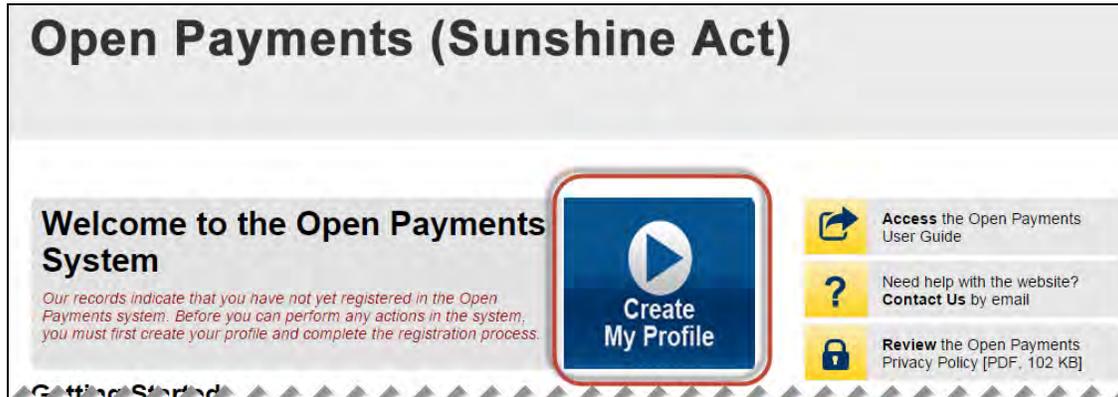


Step 2: Select the user type to which you would like to switch, or which user type you would like to request a role. When finished, select “Switch.” If you decide you do not want to change user types, or you selected “Switch User Type” by accident, select “Cancel and Go Back.”



Open Payments User Guide

Step 3: If you are not currently assigned a role for the selected user type, you will be prompted to create a profile.



Step 3a: If you are currently assigned a role for the selected user type, you will be able to view your profile information for that user type.



The profile type will be displayed at the top of the page.

You may switch between user types at any time. To perform system actions such as registration and nominations, data submission, and review and dispute for the user type that is displayed, refer to the corresponding section of this User Guide.

Section 6.4: Open Payments Users and User Roles

There are two user roles available for individuals associated with physicians or teaching hospitals: authorized officials or authorized representatives.

6.4a: Physician User Roles

A physician may designate **one authorized representative** within the Open Payments system to take certain actions on behalf of the physician. This person can be another physician, an office manager, a practice manager, or another person the physician would like to designate to interface with the Open Payments system on his or her behalf. A physician cannot be his or her own authorized representative, and a physician can only have one physician authorized representative.

The physician will designate the level of access for their authorized representative; more than one access level can be granted. The different levels of access that can be granted to the authorized representative are:

1. **Read:** Default access level. Able to see physician profile and records information.
2. **Modify Profile:** Able to edit or enter the physician’s My Profile information (NPI, license, specialties, etc.).
3. **Dispute Records:** Able to dispute reported payments, other transfers of value, or physician ownership and investment interests.

Figure 6.7: Physician User Roles and User Role Functions

User Role	Function
Physician	<ul style="list-style-type: none"> • Registers him- or herself in the Open Payments system • Nominates an authorized representative • Has full access to review and dispute records
Authorized Representative	<ul style="list-style-type: none"> • Physician can grant one or more of the following access levels: <ul style="list-style-type: none"> — <u>Read-only</u>: (default) Able to see physician profile and records information — <u>Modify Profile</u>: Able to edit or enter a physician’s “My Profile” information (NPI, license, specialties, etc.) — <u>Dispute Records</u>: Able to dispute records related to the physician submitted by reporting entities • Access levels are separate; having “dispute records” access does not automatically include “modify profile” access, or vice versa

6.4b: Teaching Hospital User Roles

Teaching hospitals can have up to 10 unique users holding a role of either of authorized official or authorized representative. There can be a maximum of five authorized officials per teaching hospital. For teaching hospitals, authorized officials are responsible for approving all user role nominations and modifying user roles. The teaching hospital authorized representatives will be granted certain permissions to access/review data, initiate a dispute on behalf of the teaching hospital, and make/approve nominations by an authorized official. The authorized representatives can be a physician, an office manager, a practice manager, or any person the teaching hospital would like to designate. There can be a maximum of five authorized official(s) per teaching hospital. The user roles applicable for teaching hospitals are given in Figure 6.8 below.

Figure 6.8: Teaching Hospital User Roles and User Role Functions

User Role	Function
Authorized Official	<ul style="list-style-type: none">Registers the teaching hospital in the Open Payments systemModifies the teaching hospital's profile in the Open Payments systemNominates other users and modifies existing user rolesApproves/denies nominations made by others, and approves/denies requests for user roles made by others, including self-nominationsReviews and disputes records associated with the teaching hospital
Authorized Representative	<ul style="list-style-type: none">Reviews and disputes records associated with the teaching hospitalNominates other individuals for user roles with teaching hospital (nominations must be confirmed by an authorized official)

To nominate an individual for any role, the following information must be input into the Open Payments system about that individual:

- First name
- Last name
- Business phone
- Business address
- Email address

Section 6.5: Nominations

The nomination process allows users to assign specific roles to individuals to act on behalf of a physician or teaching hospital. Physicians can nominate an individual to serve as an authorized representative, and users affiliated with teaching hospitals can nominate individuals to serve as authorized representatives or authorized officials. Also, individuals can nominate themselves for a user role with a teaching hospital.

An authorized official from the teaching hospital must approve all nominations before users can begin performing actions in the system. Note: If you nominate yourself for a role with a teaching hospital that is already registered but lacks an active authorized official, contact the Open Payments Help Desk at openpayments@cms.hhs.gov to complete the registration.

Individuals may not self-nominate to serve on behalf of physicians. The physician must directly nominate the individual to serve as the authorized representative.

Nominations can be made during registration or afterwards. The system will generate an email notification to the nominee informing them that they are nominated for a role in the Open Payments system. The email notifying teaching hospital authorized officials and authorized representatives will contain a registration ID and a nomination ID. The registration ID is specific to the teaching hospital; the nomination ID is specific to the individual nominee. The email notifying physician authorized representatives will contain only a nomination ID. Users notified of their nomination for a role must use the registration ID and/or nomination ID received in the nomination email to complete their profile in the Open Payments system to receive access to the functions for that specific role.

The nominee must confirm or reject the role within 10 calendar days. They can do so by registering in EIDM to obtain credentials and request access to the Open Payments system. Nominees can then log in to the Open Payments system to confirm or reject the role. The Open Payments system will render the nomination inactive if the nomination has not been accepted or rejected within 10 calendar days. This information is included in the email notification.

If the nomination is accepted, the individual will be able to complete a user profile, gain access to the system, and perform the duties of their role. If they reject the nomination, the individual will not be able to perform the actions on that entity's behalf and the officer will receive an email notification of the nomination rejection.

Note: Nominees will need to have EIDM credentials in order to access the Open Payments system and accept or reject their nominations.

If there is no action taken by the nominee, a final reminder notification will be sent on the 9th calendar day, reminding the nominee that they have yet to accept or reject the nomination. If the nomination is still not accepted or rejected by the end of the 10th calendar day, a deactivated nomination notification will be sent to the nominee. **Figure 6.9** shows the five steps in the nomination acceptance process.

Open Payments User Guide

Figure 6.9: Accepting Nominations Process



Specific step-by-step instructions for various scenarios follow.

6.5a: Nominating a Physician Authorized Representative (Returning System Users)

If you are a physician that did not delegate an authorized representative during initial registration, follow the steps below to nominate an individual for that role.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page, and select the “My Profile” tab.

Open Payments (Sunshine Act)
Physician Switch User Type

Home | Review and Dispute (Review, Affirm, Dispute) | Manage Physicians (Register, Edit, Nominate Roles) | **My Profile (Account, Roles, Nominations)** | Help

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - Review and dispute functionality in the Open Payments system is unavailable until April 2016. CMS will announce the beginning of the review and dispute period via the Open Payments listserv.

You may register or affiliate yourself with a teaching hospital, accept or request nominations, and review your profile information. Resources to complete these actions are located on the Resources page of the Open Payments website.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

You can manage your user profile and perform the actions associated with your profile. Note: In order to be able to review all records submitted for you, you must have entered your NPI, if available, and all state licenses under your profile details in Open Payments system.

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: From the “My Profile Overview” tab, select the “My Profile Details” tab.

Open Payments (Sunshine Act)
Physician Switch User Type

Home | Review and Dispute (Review, Affirm, Dispute) | **My Profile** (Account, Roles, Nominations) | Help

My Profile

John Miller

Overview | **My Profile Details** | My Roles & Nominations

Profile Name

John Miller	Medical Doctor	Vetted 12/15/2015
-------------	----------------	----------------------

Your Roles

Role:	Name:	Role Status:
Physician	You	Vetted

Access the Open Payments User Guide
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Review the Open Payments Privacy Policy [PDF, 102 KB]

Step 3: On this page, you will be able to view your profile information. Select “Update Profile.”

Open Payments (Sunshine Act)
Physician Switch User Type

Home | Review and Dispute (Review, Affirm, Dispute) | **My Profile** (Account, Roles, Nominations) | Help

My Profile

John Miller | Medical Doctor

Overview | **My Profile Details** | My Roles & Nominations

To update your profile details, including adding or updating authorized representative information, select the “Update Profile” button.

Update Profile

Personal Information

Name: John Miller	Physician Practice Name:
Business Email Address: openpayments@jopmail.com	Physician Practice Business Address: 7500 Security Blvd Baltimore, MD 21244
Business Telephone Number: 555.555.5555	

Physician Information

Physician Primary Type:
Medical Doctor

National Provider Identifier (NPI):
1234567890

Drug Enforcement Administration (DEA) Number:

Taxonomy Codes:
1. Allopathic & Osteopathic Physicians (Anesthesiologist)

State Licenses:

Maryland License	1234567890
-------------------------	------------

Access the Open Payments User Guide
Need help with the website? Contact Us by email
Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 4: On the “My Profile” page, you can nominate an authorized representative if you did not do so during initial registration, or update the level of access for an existing authorized representative. You may also change your current authorized representative. To do this, replace the existing authorized representative’s name, email address, telephone number, job title, business address and level of access information with new data. The system will generate an email notification with a Nomination ID to the nominee informing that person of their nomination for a role in the Open Payments system.

If you still do not wish to delegate an authorized representative, select “Not now” and select “Save Updates.” On this page, you may also modify your profile information, such as adding or editing your state license information or physician taxonomy codes. See Section 6.6 for more information on profile updates.

If you wish to delegate an authorized representative, select “Yes, designate an authorized representative.” The fields required to nominate an authorized representative will appear on the page. Please enter information for all required fields. Required fields will appear with an asterisk.

The default level of access is “Read.” If you would like the authorized representative to have more access while representing you in the Open Payments system, select “Modify Profile” or “Dispute Records.” Access levels are discussed in Section 6.4. When complete, select “Save Updates.”

Open Payments (Sunshine Act)

Physician Switch User Type

Home

Review and Dispute
Review, Affirm, Dispute

My Profile

Account, Roles, Nominations

Help

My Profile

John Miller

Medical Doctor

Overview

My Profile Details

My Roles & Nominations



Access the Open Payments User Guide



Need help with the website? Contact Us by email



Review the Open Payments Privacy Policy [PDF, 102 KB]

Update Profile

A field with an asterisk (*) is required.

You may update your physician profile by entering the updated information below. You must provide your National Provider Identifier (NPI) if you have one. You must also provide all of your state licenses. Note: Once your profile has been successfully vetted, you will not be able to update your NPI in your physician profile.

The first name and last name fields have been pre-populated from your MS/Enterprise Identity



Nominated Authorized Representative's Access Level

By default, the authorized representative can read any information in the physician's profile in the Open Payments system. Select any additional level(s) of access to be granted to the authorized representative below. The access level will determine the actions the authorized representative can take on behalf of the physician in the Open Payments system. Authorized representatives will not be able to edit their access levels.

* Access Level:

- Read** - Default access level. Able to see physician profile and records information.
- Modify Profile** - Able to edit or enter the physician's My Profile information (NPI, license, specialties, etc.)
- Dispute Records** - Able to comment on information submitted about payments or other transfers of value, ownership, and investment interests with the submitter (applicable manufacturer or GPO). Also able to dispute reported payments or other transfers of value, ownership, and investment interests.

Cancel

Save Updates

Open Payments User Guide

Step 5: The nominee will receive an email notification that they have been nominated for a role in the Open Payments system. The email will contain a nomination ID. Users notified of their nomination for a role must use the nomination ID received in the nomination email to complete their profile in the Open Payments system and receive access to the functions for that specific role. The nominee will have 10 calendar days to accept or reject the nomination.

Open Payments (Sunshine Act)

Physician Switch User Type

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

[Review, Affirm, Dispute](#) [Account, Roles, Nominations](#)

My Profile

John Miller Medical Doctor

[Overview](#) [My Profile Details](#) [My Roles & Nominations](#)

To update your profile details, including adding or updating authorized representative information, select the "Update Profile" button.

[Update Profile](#)

Personal Information

Name: John Miller	Physician Practice Name: Physician Practice Business Address: 7500 Security Blvd Baltimore, MD 21244
Business Email Address: openpayments@yopmail.com	
Business Telephone Number: 555-555-5555	

Physician Information

Physician Primary Type: Medical Doctor	Authorized Representative: Mary Davis
National Provider Identifier (NPI): 1234567890	Business Email Address: openpayments@yopmail.com
Drug Enforcement Administration (DEA) Number:	Business Telephone Number: 555-555-5555
Taxonomy Codes: 1 Allopathic & Osteopathic Physicians(Anesthesiology)	Job Title: Office Manager
State Licenses: Maryland License 1234567890	Business Address: 7500 Security Blvd Baltimore, MD 21244

Physician's Authorized Representative

Access Level:
Edit Physician profile
Review Data (Read-Only)
Dispute Data

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

[Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)



Open Payments User Guide

6.5b: Nominating Additional Roles for a Teaching Hospital (Returning System Users)

If you are an authorized official for a teaching hospital that did not nominate individuals for user roles during initial registration, follow the steps below. The authorized representative can be a physician, an office manager, a practice manager, or any person the teaching hospital would like to designate.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page, and select the “Manage Teaching Hospitals” tab.

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

Announcements

2015 Program Year General Information - Review and dispute functionality in the Open Payments system is unavailable until April 2016. CMS will announce the beginning of the review and dispute period via the Open Payments listserv.

You may register or affiliate yourself with a teaching hospital, accept or request nominations, and review your profile information. Resources to complete these actions are located on the Resources page of the Open Payments website.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

You can manage your user profile and perform the actions associated with your profile.

- Access the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: Select the teaching hospital for which you wish to nominate a new role.

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

Manage Teaching Hospitals

Below are the teaching hospitals with which you are affiliated. To view details and manage user roles, select a teaching hospital from the list below. You may also register a new teaching hospital by selecting "Register New Teaching Hospital."

[Register New Teaching Hospital](#)

Your Teaching Hospitals

Doing Business As (DBA) Name	TIN	Address	Status
ABCDE Teaching Hospital	12-3456789	7500 Security Blvd Baltimore MD 21244	Registered

Access the Open Payments User Guide | Need help with the website? Contact Us by email | Review the Open Payments Privacy Policy [PDF, 102 KB]

Step 3: Select the "Manage Roles" tab.

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

ABCDEF Teaching Hospital

Teaching Hospital Information | **Manage Roles**

Below are the details for the teaching hospital you selected, listed by program year.

ABCDEF Teaching Hospital

Taxpayer Identification Number (TIN): 12-3456789

Teaching Hospital History

Program Year	TIN	DBA Name	Legal Name	Cost Report Address	NPPES Address
2015	12-3456789	ABCDEF Teaching Hospital	ABCDEF Teaching Hospital	7500 Security Blvd Baltimore, MD 21244	7500 Security Blvd Baltimore, MD 21244
2014	12-3456789	ABCDEF Teaching Hospital	ABCDEF Teaching Hospital	7500 Security Blvd Baltimore, MD 21244	7500 Security Blvd Baltimore, MD 21244
2013	12-3456789	ABCDEF Teaching Hospital	ABCDEF Teaching Hospital	7500 Security Blvd Baltimore, MD 21244	7500 Security Blvd Baltimore, MD 21244

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Step 4: Select "Nominate New Role."

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](#)

ABCDE Teaching Hospital

[Teaching Hospital Information](#) [Manage Roles](#)

Below is the list of nominations for the teaching hospital. You may have up to 10 active users for this teaching hospital, 5 of which can be authorized officials. Select one of the actions (i.e. "Modify", "Approve") to update or approve the roles. Select "Nominate New Role" to create a new nomination.

[Nominate New Role](#)

Name:	Role:	Status:	Actions:
Mary Smith	Authorized Official	Vetted	

[Access the Open Payments User Guide](#)

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Open Payments User Guide

Step 5: Enter the required fields and select the desired role for the nomination, such as authorized official. All required fields are marked with an asterisk. When finished, select “Send Nomination.”

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](#)

ABCDE Teaching Hospital

[Teaching Hospital Information](#) | [Manage Roles](#)

Nominee

A field with an asterisk (*) is required.

Nominate someone who will have a role in the Open Payments system for your Teaching Hospital.

*First Name: Middle Name:

*Last Name: Suffix (Jr., Sr., etc.):

*Email Address: *Business Phone:

***Indicate the role this person will have:**

Authorized Official: Responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.

Authorized Representative: Granted permission by the teaching hospital's authorized official to access/review data, initiate a dispute on behalf of the teaching hospital and make/approve nominations for other users.

Business Address

Business Address, Line 1:

Business Address, Line 2:

City Name: State: Zip Code:

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

[Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)



Open Payments User Guide

After you send the nomination, you will be brought back to the “Manage Roles” tab and you will see that the new nomination and the status of the nomination are now listed on the page.

The screenshot displays the 'Open Payments (Sunshine Act)' web interface. At the top, there is a navigation bar with tabs: Home, Review and Dispute (Review, Affirm, Dispute), Manage Teaching Hospitals (Register, Edit, Nominate Roles), My Profile (Account, Roles, Nominations), and Help. Below the navigation bar, the page title is 'ABCDE Teaching Hospital'. There are two tabs: 'Teaching Hospital Information' and 'Manage Roles'. The 'Manage Roles' tab is active, showing a list of nominations. A text box explains: 'Below is the list of nominations for the teaching hospital. You may have up to 10 active users for this teaching hospital, 5 of which can be authorized officials. Select one of the actions (i.e. "Modify", "Approve") to update or approve the roles. Select "Nominate New Role" to create a new nomination.' To the right of the text box is a 'Nominate New Role' button. Below the text box is a table with columns: Name, Role, Status, and Actions. The table contains two rows: one for Mary Smith (Authorized Official, Vetted) and one for Robert Miller (Authorized Official, Nomination Approved). A 'Modify' button is next to Robert Miller's row. To the right of the table are three help links: 'Access the Open Payments User Guide', 'Need help with the website? Contact Us by email', and 'Review the Open Payments Privacy Policy [PDF, 102 KB]'. At the bottom right, there is a photo of a man and a woman in professional attire.

Name:	Role:	Status:	Actions:
Mary Smith	Authorized Official	Vetted	
Robert Miller	Authorized Official	Nomination Approved	Modify

The nominee will receive an email notification that they have been nominated for a role in the Open Payments system. The email notifying the nominee will contain a registration ID and a nomination ID. Users notified of their nomination for a role must use the registration ID and nomination ID received in the nomination email to complete their profile in the Open Payments system and receive access to the functions for that specific role. The nominee will have 10 calendar days to accept or reject the nomination.

Instructions for confirming nominations can be found in the next section.

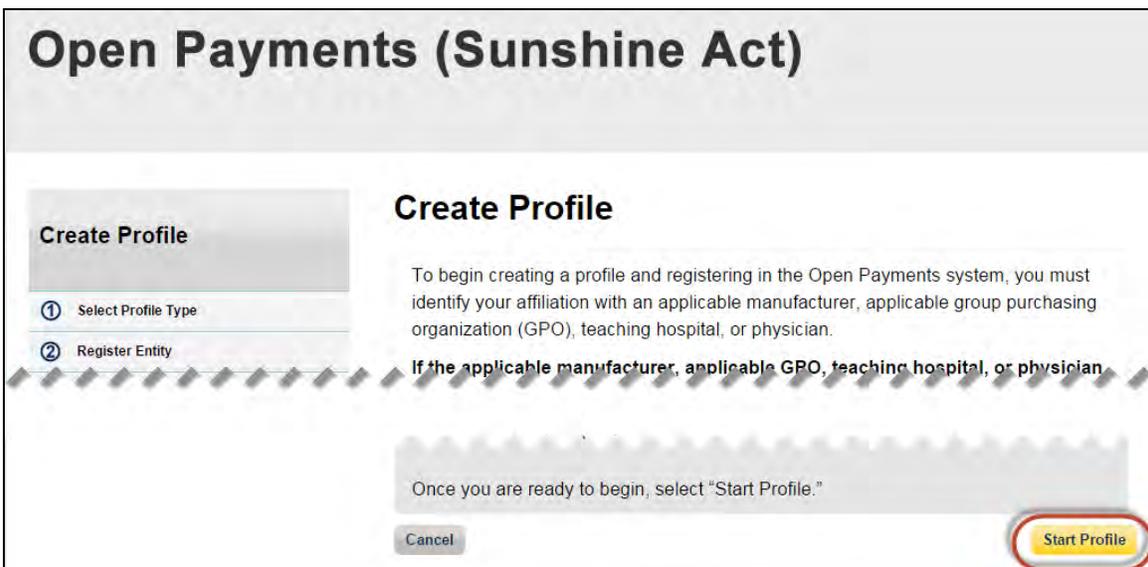
6.5c: Accepting or Rejecting a Nomination (Physician Authorized Representative - First Time Users)

If you have been nominated for a physician authorized representative role, you will receive a notification email containing instructions and important information needed to accept your nomination. Once you have received this email, follow the steps below to accept the nomination.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page. The on-screen text contains important information regarding the registration process. Read the on-screen text and select “Create My Profile” when you are ready to begin the registration process.



Step 2: The on-screen text contains important information regarding creating the physician and individual profile. Read the on-screen text and select “Start Profile” at the bottom of the page when you are ready to continue.



Open Payments User Guide

Step 3: Although you are affiliating with a physician, do not select “Physician” on the “Select Profile Type” page. Instead, select the “I Have a Registration ID and Nomination ID” link at the bottom of the page.

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Register Entity
- Personal Information
- Review and Submit Profile

Select Profile Type

A field with an asterisk (*) is required.

If you do not have a registration ID and/or nomination ID, begin creating your profile by indicating below whether you are affiliated with an applicable manufacturer or applicable GPO, teaching hospital, or physician.

If you received a registration ID and/or nomination ID in an email notifying you of your nomination role, you may begin creating your profile by selecting the "I have a Registration ID and Nomination ID" link.

Note that if you wish to register as a physician authorized representative, you must have a nomination ID. You cannot nominate yourself for a physician authorized representative role.

If you are a physician that is affiliated with a teaching hospital, you should register yourself as a physician and not as a teaching hospital. Physicians can view records submitted about them only if they register themselves as physicians. Registering as a teaching hospital will allow you to view only records submitted about the teaching hospital. If you have any questions regarding the user type you should register as, please contact the Open Payments Help Desk (openpayments@cms.hhs.gov) for guidance.

***Required: Select the type of entity or covered recipient you are affiliated with OR the "I have a Registration and Nomination ID" link.**

Applicable manufacturer or applicable group purchasing organization (GPO)

Physician

Teaching hospital

----- OR -----

[I have a Registration ID and Nomination ID](#)

Cancel Continue

Step 4: Select the User Type “Physician.” Enter the nomination ID included in the nomination notification email you received and then select “Show Nomination.”

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Register Entity
 - Search Nomination
 - Entity Information
 - Confirm Nomination
- Personal Information
- Review and Submit Profile

Enter Registration & Nomination ID

A field with an asterisk (*) is required.

From the dropdown list below, select your User Type.

Enter the Registration ID and Nomination ID provided in the nomination email notification you should have received.

Select "Show Nomination" to see the information associated with your nomination.

***User Type**

Physician

***Nomination ID:**

The ID is a 12-digit number

842660133159

Show Nomination

Cancel Continue

Open Payments User Guide

Step 5: Review the nomination information displayed. If the information is correct, select “Continue.” If the information is incorrect, select “Cancel” and contact the nominator directly.

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ② Register Entity
- Search Nomination**
 - Entity Information
 - Confirm Nomination
- ③ Personal Information
- ④ Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Enter Registration & Nomination ID

A field with an asterisk (*) is required.

From the dropdown list below, select your User Type.

Enter the Registration ID and Nomination ID provided in the nomination email notification you should have received.

Select "Show Nomination" to see the information associated with your nomination.

***User Type**
Physician

***Nomination ID:**
The ID is a 12-digit number
842660133159

Show Nomination

Below is the information associated with the nomination.
Select "Continue" if the information displayed on the screen is correct.
Select "Cancel" to return to the Registration ID and Nomination ID page if the information displayed is incorrect.

Mary Davis was nominated as Authorized Representative for
User Type: **Physician**
Physician's Name: **Susan Jones**

Cancel **Continue**

Open Payments User Guide

Step 6: Review the physician information displayed on the page. You will not be able to edit the information. Ensure that this is the physician for which you want to accept the user role nomination. If it is not the correct physician, 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.

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Confirm Physician**
- Confirm Nomination
- Authorized Representative
- Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Confirm Physician Information

Below is the information for your selected physician. Review and confirm the Physician identified below is correct. Select “Continue” to begin creating your user profile.

Personal Information

First Name: Susan	Last Name: Jones
Business Telephone Number: 555-555-5555	Business Email Address: openpayments@yopmail.com
Physician Practice Name: Practice Business Address, Line 1: 7500 Security Blvd Practice Business Address, Line 2:	
City Name: Baltimore	
State: MD	
Zip Code: 21244	

Physician Information

Physician Primary Type: Medical Doctor
National Provider Identifier (NPI): 1234567890
Drug Enforcement Administration (DEA) Number:

Physician Taxonomy Codes

Taxonomy Codes:
207L00000X

State Licensing Information

License State:	License Number:
Indiana	1234567890

Open Payments User Guide

Step 7: Review the nomination information on the page. Select “Yes, I accept the role of Authorized Representative” if you wish to accept the role or “No, I do not accept” if you do not wish to accept the role. If you accept the role and select “Continue,” you will continue the nomination confirmation process.

If you reject the role for which you have been nominated, select “Continue” after selecting “No, I do not accept” for the role. The system will ask you if you are sure you want to reject this role. If you confirm your choice to reject the role, you will exit the system and the nominator will receive an email that you rejected the nomination. The nominator will then be allowed to nominate another individual for the role.

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ✓ Confirm Physician
- ③ Confirm Nomination**
- ④ Authorized Representative
- ⑤ Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? **Contact Us** by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Confirm Nomination

A field with an asterisk (*) is required.

Confirm the user role by either accepting or rejecting the nomination. Select the appropriate option below. Then, select "Continue" to work on your personal profile.

Susan Jones
7500 Security Blvd
Baltimore, MD 21244

Physician Primary Type: Medical Doctor
National Provider Identifier (NPI): 1234567890
Business Telephone Number: 555-555-5555

***Confirm Nominations:**

- Yes, I accept the role of **Authorized Representative**
- No, I do not accept

Access Level:

- Read** - Default access level. Able to see physician profile and records information.
- Modify Profile** - Able to edit or enter the physician's My Profile information (NPI, license, specialties, etc.).
- Dispute Records** - Able to comment on information submitted about payments or other transfers of value, ownership, and investment interests with the submitter (applicable manufacturer or GPO). Also able to dispute reported payments or other transfers of value, ownership, and investment interests.

Cancel Back **Continue**

Step 8: Enter your personal information and select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ✓ Confirm Physician
- ✓ Confirm Nomination
- 4 Authorized Representative**
- 5 Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? [Contact Us](#) by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Physician: Authorized Representative

A field with an asterisk (*) is required.

Authorized Representative

Enter the name, business email, job title, and business telephone number of the nominated authorized representative.

*Authorized Representative's First Name: Mary	Authorized Representative's Middle Name
*Authorized Representative's Last Name: Davis	Authorized Representative's Suffix
*Business Email Address: openpayments@yopmail.com	*Business Telephone Number: 999-999-9999 555-555-5555
*Job Title: Office Manager	

Authorized Representative's Business Address

Enter the nominated authorized representative's business address information below. Enter the primary business address if the authorized representative has multiple business addresses.

*Business Address, Line 1:
7500 Security Blvd

Business Address, Line 2:

*City Name: Baltimore	*State: Maryland	*Zip Code: 99999 9999 21244
--------------------------	---------------------	-----------------------------------

Cancel Back **Continue**

Open Payments User Guide

Step 9: Now you will be asked to review the information you have entered. To correct any errors, select the “Back” button at the bottom of the page to return to previous pages and make your corrections. If the information is correct, select “Submit.”

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ✓ Confirm Physician
- ✓ Confirm Nomination
- ✓ Authorized Representative
- 5 Review and Submit Profile >

Review and Submit Profile

Review the information on this page to ensure it is correct. Select “Back” to navigate to the previous pages to correct any invalid information. Select “Continue” to submit your profile.

Authorized Representative Information

First Name: Mary Last Name: Davis
Middle Name: Suffix (Jr., Sr., etc.):
Business Telephone Number: 555-555-5555
Business Email Address: openpayments@yopmail.com
Job Title: Office Manager
Practice Business Address, Line 1: 7500 Security Blvd
Practice Business Address, Line 2:
City Name: Baltimore State: MD
Zip Code: 21244

Cancel Back Submit

The following message will appear on-screen to confirm your nomination has been successfully accepted.

Open Payments (Sunshine Act)

Physician Switch User Type

Create Profile

- ✓ Select Profile Type
- ✓ Confirm Physician
- ✓ Confirm Nomination
- ✓ Authorized Representative
- ✓ Review and Submit Profile

You have successfully created your profile, Mary Davis

You may now:

- Go to Open Payments Home
- Refer to the Open Payments User Guide for further information

Access the Open Payments User Guide
Need help with the website? Contact Us by email
Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

6.5d: Accepting or Rejecting a Nomination (Physician Authorized Representative – Returning System Users)

If you have been nominated for a physician authorized representative role, you will receive a notification email containing instructions and important information needed to accept your nomination. Once you have received this email, follow the steps below to accept the nomination.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials, navigate to the Open Payments home page, and select the “My Profile” tab from the menu bar on the Open Payments landing page.

Open Payments (Sunshine Act)
Physician Switch User Type

Home Review and Dispute (Review, Affirm, Dispute) Manage Physicians (Register, Edit, Nominate Roles) **My Profile** (Account, Roles, Nominations) Help

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - Review and dispute functionality in the Open Payments system is unavailable until April 2016. CMS will announce the beginning of the review and dispute period via the Open Payments listserv.

You may register or affiliate yourself with a teaching hospital, accept or request nominations, and review your profile information. Resources to complete these actions are located on the Resources page of the Open Payments website.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

You can manage your user profile and perform the actions associated with your profile. Note: In order to be able to review all records submitted for you, you must have entered your NPI, if available, and all state licenses under your profile details in Open Payments system.

- Access the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: From the “My Profile Overview” tab, select the “My Roles and Nominations” tab.

The screenshot shows the 'Open Payments (Sunshine Act)' interface for a 'Physician Switch User Type'. The navigation bar includes 'Home', 'Review and Dispute' (Review, Affirm, Dispute), 'My Profile' (Account, Roles, Nominations), and 'Help'. The 'My Profile' section shows the user 'Karen Miller' with a 'Medical Doctor' role, vetted on 5/12/2015. The 'My Roles & Nominations' tab is highlighted with a red circle. Below it, the 'Your Roles' table shows a role of 'Physician' for 'You' with a status of 'Vetted'. On the right, there are three utility links: 'Access the Open Payments User Guide', 'Need help with the website? Contact Us by email', and 'Review the Open Payments Privacy Policy [PDF, 102 KB]'. An image of a doctor and a man in a suit is also present.

Step 3: From the “My Roles and Nominations” tab, select “Accept/Reject Nominations.”

The screenshot shows the 'Open Payments (Sunshine Act)' interface for a 'Physician Switch User Type'. The navigation bar is the same as in Step 2. The 'My Profile' section shows the user 'Karen Miller' with a 'Medical Doctor' role. The 'My Roles & Nominations' tab is selected and highlighted with a blue background. Below it, the 'Accept/Reject Nominations' button is highlighted with a red circle. The 'My Roles' section contains the text: 'Select "Accept/Reject Nominations" above to respond to any nominations. You will be asked to enter the nomination and registration IDs. Accepted role(s) are listed below.' Below this text is a table with the following data:

Role:	Physician's Name:	Role Status:
Physician	You	Vetted

On the right, there are three utility links: 'Access the Open Payments User Guide', 'Need help with the website? Contact Us by email', and 'Review the Open Payments Privacy Policy [PDF, 102 KB]'. An image of a doctor and a man in a suit is also present.

Open Payments User Guide

Step 4: The “User Type” should be pre-populated with “Physician.” Enter the nomination ID provided in the nomination notification email you received and then select “Show Nomination.”

Open Payments (Sunshine Act)
Physician [Switch User Type](#)

Home | **Review and Dispute** (Review, Affirm, Dispute) | **My Profile** (Account, Roles, Nominations) | **Help**

Create Profile

- ✓ Select Profile Type
- ② Register Entity
 - Search Nomination** (Entity Information, Confirm Nomination)
- ③ Personal Information
- ④ Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? **Contact Us** by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Enter Registration & Nomination ID

A field with an asterisk (*) is required.

From the dropdown list below, select your User Type.

Enter the Registration ID and Nomination ID provided in the nomination email notification you should have received.

Select "Show Nomination" to see the information associated with your nomination.

***User Type**
Physician

***Nomination ID:**
The ID is a 12-digit number
617366795227

Show Nomination

Cancel

Open Payments User Guide

Step 5: Review the nomination information displayed. If the information is correct, select “Continue.” If the information is incorrect, select “Cancel” and contact the nominator directly.

Open Payments (Sunshine Act)
Physician Switch User Type

Home | **Review and Dispute** (Review, Affirm, Dispute) | **My Profile** (Account, Roles, Nominations) | Help

Create Profile

- Select Profile Type
- Register Entity
- Search Nomination** (Entity Information, Confirm Nomination)
- Personal Information
- Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Enter Registration & Nomination ID

A field with an asterisk (*) is required.
From the dropdown list below, select your User Type.

Enter the Registration ID and Nomination ID provided in the nomination email notification you should have received.
Select "Show Nomination" to see the information associated with your nomination.

*User Type
Physician

*Nomination ID:
The ID is a 12-digit number
617366795227

Show Nomination

Below is the information associated with the nomination.
Select "Continue" if the information displayed on the screen is correct.
Select "Cancel" to return to the Registration ID and Nomination ID page if the information displayed is incorrect.

Karen Miller was nominated as Authorized Representative for
User Type: **Physician**
Physician's Name: **Joe Smith**

Cancel | Continue

Open Payments User Guide

Step 6: Review the physician information displayed on the page. You will not be able to edit the information. Ensure that this is the physician for which you want to accept the user role nomination. If it is not the correct physician, 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.

Open Payments (Sunshine Act)

Physician Switch User Type

Home | **Review and Dispute** (Review, Affirm, Dispute) | My Profile (Account, Roles, Nominations) | Help

Create Profile

- Select Profile Type
- 2 Confirm Physician**
- 3 Confirm Nomination
- 4 Authorized Representative
- 5 Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Confirm Physician Information

Below is the information for your selected physician. Review and confirm the Physician identified below is correct. Select "Continue" to begin creating your user profile.

Personal Information	
First Name: Joe	Last Name: Smith
Business Telephone Number: 555-555-5555	Business Email Address: openpayments@yopmail.com
Physician Practice Name:	
Practice Business Address, Line 1: 7500 Security Blvd	
Practice Business Address, Line 2:	
City Name: Baltimore	
State: MD	
Zip Code: 21244	
Physician Information	
Physician Primary Type: Medical Doctor	
National Provider Identifier (NPI): 1234567890	
Drug Enforcement Administration (DEA) Number:	
Physician Taxonomy Codes	
Taxonomy Codes:	
207L00000X	
State Licensing Information	
License State:	License Number:
Maryland	1234567890

Cancel | Back | **Continue**

Open Payments User Guide

Step 7: Review the nomination information on the page. Select “Yes, I accept the role of” if you wish to accept the role or “No, I do not accept” if you do not wish to accept the role. If you accept the role and select “Continue,” you will continue the nomination confirmation process.

If you reject the role for which you have been nominated, select “Continue” after selecting “No, I do not accept” for the role. The system will ask you if you are sure you want to reject this role. If you confirm your choice to reject the role, you will exit the system and the nominator will receive an email that you rejected the nomination. The nominator will then be allowed to nominate another individual for the role.

Open Payments (Sunshine Act)

Physician Switch User Type

Home | **Review and Dispute** (Review, Affirm, Dispute) | My Profile (Account, Roles, Nominations) | Help

Create Profile

- ✓ Select Profile Type
- ✓ Confirm Physician
- 3 Confirm Nomination**
- 4 Authorized Representative
- 5 Review and Submit Profile

[Access the Open Payments User Guide](#)

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

[Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)

Confirm Nomination

A field with an asterisk (*) is required.

Confirm the user role by either accepting or rejecting the nomination. Select the appropriate option below. Then, select "Continue" to work on your personal profile.

Joe Smith
7500 Security Blvd
Baltimore, MD 21244

Physician Primary Type: Medical Doctor
National Provider Identifier (NPI): 1234567890
Business Telephone Number: 555-555-5555

*** Confirm Nominations:**

- Yes, I accept the role of **Authorized Representative**
- No, I do not accept

Access Level:

- Read** - Default access level. Able to see physician profile and records information.
- Modify Profile** - Able to edit or enter the physician's My Profile information (NPI, license, specialties, etc.)
- Dispute Records** - Able to comment on information submitted about payments or other transfers of value, ownership, and investment interests with the submitter (applicable manufacturer or GPO). Also able to dispute reported payments or other transfers of value, ownership, and investment interests.

Cancel | Back | **Continue**

Step 8: Enter your personal information and select "Continue."

Open Payments (Sunshine Act)

Physician Switch User Type

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

Create Profile

- Select Profile Type
- Confirm Physician
- Confirm Nomination
- 4 Authorized Representative**
- 5 Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Physician: Authorized Representative

A field with an asterisk (*) is required.

Authorized Representative

Enter the name, business email, job title, and business telephone number of the nominated authorized representative.

*Authorized Representative's First Name:	Authorized Representative's Middle Name
Karen	
*Authorized Representative's Last Name:	Authorized Representative's Suffix
Miller	
*Business Email Address:	*Business Telephone Number:
openpayments@yopmail.com	999-999-9999
	555-555-5555
*Job Title:	
Manager	

Authorized Representative's Business Address

Enter the nominated authorized representative's business address information below. Enter the primary business address if the authorized representative has multiple business addresses.

*Business Address, Line 1:
7500 Security Blvd

Business Address, Line 2:

*City Name:	*State:	*Zip Code:
Baltimore	Maryland	99999 9999
		21244

Cancel Back **Continue**

Open Payments User Guide

Step 9: Now you will be asked to review the information you have entered. To correct any errors, select the “Back” button at the bottom of the page to return to previous pages and make your corrections. If the information is correct, select “Submit.”

Open Payments (Sunshine Act)
Physician Switch User Type

Home | **Review and Dispute** (Review, Affirm, Dispute) | My Profile (Account, Roles, Nominations) | Help

Create Profile

- ✓ Select Profile Type
- ✓ Confirm Physician
- ✓ Confirm Nomination
- ✓ Authorized Representative
- 5 Review and Submit Profile >**

Review and Submit Profile

Review the information on this page to ensure it is correct. Select “Back” to navigate to the previous pages to correct any invalid information. Select “Continue” to submit your profile.

Authorized Representative Information

First Name: Karen | Last Name: Miller
Middle Name: | Suffix (Jr., Sr., etc.):
Business Telephone Number: 555-555-5555
Business Email Address: openpayments@yopmail.com
Job Title: Manager
Practice Business Address, Line 1: 7500 Security Blvd
Practice Business Address, Line 2:
City Name: Baltimore | State: MD
Zip Code: 21244

Cancel | Back | **Submit**

The following message will appear on-screen to confirm your nomination has been successfully accepted.

Open Payments (Sunshine Act)
Physician Switch User Type

Home | **Review and Dispute** (Review, Affirm, Dispute) | **Manage Physicians** (Register, Edit, Nominate Roles) | My Profile (Account, Roles, Nominations) | Help

Create Profile

- ✓ Select Profile Type
- ✓ Confirm Physician
- ✓ Confirm Nomination
- ✓ Authorized Representative
- ✓ **Review and Submit Profile**

You have successfully created your profile, Karen Miller

You may now:

- Go to Open Payments Home
- Refer to the Open Payments User Guide for further information

Access the Open Payments User Guide
Need help with the website? Contact Us by email
Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

6.5e: Accepting or Rejecting a Nomination (Teaching Hospital – First Time System Users)

If you have been nominated for a teaching hospital user role, you will receive a notification email. Take note of the information in the email, including registration ID and nomination ID, then follow the steps below to accept the nomination.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page. The on-screen text contains important information regarding the registration process. Read the on-screen text and select “Create My Profile” when you are ready to begin the registration process.



Step 2: The on-screen text contains important information regarding creating the physician and individual profile. Read the on-screen text and select “Start Profile” at the bottom of the page when you are ready to continue.



Open Payments User Guide

Step 3: On the “Select Profile Type” page, though you are affiliating with a teaching hospital, do not select “Teaching Hospital.” Instead, select the link at the bottom of the page, “I Have a Registration ID and Nomination ID.”

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Register Entity
- Personal Information
- Review and Submit Profile

Access the Open Payments User Guide

? Need help with the website? **Contact Us** by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Select Profile Type

A field with an asterisk (*) is required.

If you do not have a registration ID and/or nomination ID, begin creating your profile by indicating below whether you are affiliated with an applicable manufacturer or applicable GPO, teaching hospital, or physician.

If you received a registration ID and/or nomination ID in an email notifying you of your nomination role, you may begin creating your profile by selecting the “I have a Registration ID and Nomination ID” link.

Note that if you wish to register as a physician authorized representative, you must have a nomination ID. You cannot nominate yourself for a physician authorized representative role.

If you are a physician that is affiliated with a teaching hospital, you should register yourself as a physician and not as a teaching hospital. Physicians can view records submitted about them only if they register themselves as physicians. Registering as a teaching hospital will allow you to view only records submitted about the teaching hospital. If you have any questions regarding the user type you should register as, please contact the Open Payments Help Desk (openpayments@cms.hhs.gov) for guidance.

***Required: Select the type of entity or covered recipient you are affiliated with OR the "I have a Registration and Nomination ID" link.**

- Applicable manufacturer or applicable group purchasing organization (GPO)
- Physician
- Teaching hospital

----- OR -----

[I have a Registration ID and Nomination ID](#)

Cancel Continue

Open Payments User Guide

Step 4: Select the user type “Teaching Hospital” from the drop-down menu. Enter the registration ID and nomination ID that you received in the nomination notification email and then select “Show Nomination.”

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- 2 Register Entity
- Search Nomination**
 - Entity Information
 - Confirm Nomination
- 3 Personal Information
- 4 Review and Submit Profile

Access the Open Payments User Guide

? Need help with the website? **Contact Us** by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Enter Registration & Nomination ID

A field with an asterisk (*) is required.

From the dropdown list below, select your User Type.

Enter the Registration ID and Nomination ID provided in the nomination email notification you should have received.

Select "Show Nomination" to see the information associated with your nomination.

***User Type**
Teaching Hospital

***Registration ID:**
The ID is a 12-digit number
100000080056

***Nomination ID:**
The ID is a 12-digit number
864234592506

Show Nomination

Cancel

Open Payments User Guide

Step 5: Review the nomination information displayed. If the information is correct, select “Continue.” If the information is incorrect, select “Cancel” and contact the Open Payments Help Desk at openpayments@cms.hhs.gov.

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ② Register Entity
 - Search Nomination
 - Entity Information
 - Confirm Nomination
- ③ Personal Information
- ④ Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Enter Registration & Nomination ID

A field with an asterisk (*) is required.

From the dropdown list below, select your User Type.

Enter the Registration ID and Nomination ID provided in the nomination email notification you should have received.

Select "Show Nomination" to see the information associated with your nomination.

***User Type**
Teaching Hospital

*Registration ID: The ID is a 12-digit number	*Nomination ID: The ID is a 12-digit number
10000080056	864234592506

Show Nomination

Below is the information associated with the nomination.
Select "Continue" if the information displayed on the screen is correct.
Select "Cancel" to return to the Registration ID and Nomination ID page if the information displayed is incorrect.

 **Tom Smith was nominated as Authorized Official for**

User Type: **Teaching Hospital**

Teaching Hospital Doing Business As Name: **ABCD Teaching Hospital**

Cancel **Continue**

Open Payments User Guide

Step 6: Select “Yes, I accept the role of” if you wish to accept the role or “No, I do not accept” if you do not wish to accept the role. If you accept the role and select “Continue,” you will continue the nomination confirmation process.

If you reject the role for which you have been nominated, select “Continue” after selecting “No, I do not accept” for the role. The system will ask you if you are sure you want to reject this role. If you confirm your choice to reject the role, you will exit the system and the nominator will receive an email that you rejected the nomination. The nominator will then be allowed to nominate another individual for the role.

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ② Teaching Hospital: Search
 - Search Nomination
 - Confirm Nomination**
 - ③ Personal Information
 - ④ Review and Submit Profile
- 🔗 Access the Open Payments User Guide
- 🔗 Need help with the website? Contact Us by email
- 🔒 Review the Open Payments Privacy Policy [PDF, 102 KB]

Confirm Nomination

A field with an asterisk (*) is required.

Review the teaching hospital information below to ensure this is the teaching hospital you wish to affiliate with. Accept or reject your nominated role(s) by selecting the corresponding radio button below. Select “Continue” to review and complete your user profile.

ABCD Teaching Hospital

7500 Security Blvd
Baltimore, MD 21244

TIN 123456789

***Confirm Nomination:**

Yes, I accept the role of **Authorized Official**: Responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.

No, I do not accept

Cancel Back **Continue**

Open Payments User Guide

Step 7: Review your personal information. If the information displayed is correct, select “Continue.” If the information displayed is incorrect, update the necessary fields. When finished, select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Teaching Hospital: Search
- Personal Information**
- Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

3 Personal Information

A field with an asterisk (*) is required.

Add the requested personal and business information to your user profile. Also, review any pre-populated information for accuracy and correct any invalid information.

Note that changes made here will **not** automatically update your profile information in your other CMS accounts, such as your Medicare, National Plan & Provider Enumeration System (NPPES), or Enterprise Identity Management (EIDM) accounts.

Your Name

*First Name: Tom	*Last Name: Smith
Middle Name:	Suffix (Jr., Sr., etc.):

Business Address

*Job Title: Director	*Business Email Address: openpayments@yopmail.com	*Business Telephone Number: 999-999-9999 555-555-5555
*Business Address, Line 1: 7500 Security Blvd		
Business Address, Line 2:		
*City Name: Baltimore	*State: Maryland	*Zip Code: 99999 9999 21244

Cancel Back **Continue**

Open Payments User Guide

Step 8: Review the information you have entered. To correct any errors, select the “Back” button at the bottom of the page to return to previous pages and make your corrections. If the information is correct, select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ✓ Teaching Hospital: Search
- ✓ Personal Information
- 4 Review and Submit Profile**

- Access the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

4 Review and Submit Profile

Review the information entered in the previous sections.

Select “Back” to navigate to the previous page(s) and correct any incorrect information. Select “Continue” to submit your profile.

ABCD Teaching Hospital

Teaching Hospital Business Address:	7500 Security Blvd Baltimore, MD 21244
Taxpayer Identification Number (TIN):	123456789
Your Role:	Authorized Official
First Name:	Tom
Middle Name:	
Last Name:	Smith
Suffix (Jr., Sr., etc.):	
Business Email Address:	openpayments@yopmail.com
Business Telephone Number:	555-555-5555
Job Title:	Director
Business Address, Line 1:	7500 Security Blvd
Business Address, Line 2:	
City Name:	Baltimore
State:	Maryland
Zip Code:	21244

Nominations:

Role:	First Name:	Last Name:	Business Email Address:	Business Telephone Number:
Authorized Official	Tom	Smith	openpayments@yopmail.com	555-555-5555

Open Payments User Guide

The following message will appear on-screen to confirm your nomination has been successfully accepted.

Open Payments (Sunshine Act)

Teaching Hospital Switch User Type

Create Profile

- ✓ Select Profile Type
- ✓ Teaching Hospital: Search
- ✓ Personal Information
- ✓ Review and Submit Profile

-  **Access** the Open Payments User Guide
-  Need help with the website? **Contact Us** by email
-  **Review** the Open Payments Privacy Policy [PDF, 102 KB]

Success Confirmed

You have successfully accepted your affiliation with ABCD Teaching Hospital and created your own profile, Tom Smith

You may now:

- [Go to Open Payments Home](#)

Note: Based on your user role, you now will be able to take actions related to this teaching hospital in the system.

Open Payments User Guide

6.5f: Accepting or Rejecting a Nomination (Teaching Hospital – Returning System Users)

If you have been nominated for a teaching hospital user role you will receive a notification email. Take note of the information in the email, including registration ID and nomination ID, then follow the steps below to accept the nomination.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page. Select the “My Profile” tab.

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

Announcements

2015 Program Year General Information - Review and dispute functionality in the Open Payments system is unavailable until April 2016. CMS will announce the beginning of the review and dispute period via the Open Payments listserv.

You may register or affiliate yourself with a teaching hospital, accept or request nominations, and review your profile information. Resources to complete these actions are located on the Resources page of the Open Payments website.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

You can manage your user profile and perform the actions associated with your profile.

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: Select “My Roles and Nominations.”

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](#)

My Profile

Karen Miller

[Overview](#) [My Profile Details](#) [My Roles & Nominations](#)

The page contains information about your profile and user roles.

Profile Name

Karen Miller

Your Authorized Roles

Role:	Name:	Status:
Authorized Official	WXYZ Teaching Hospital	Vetted



- [Access](#) the Open Payments User Guide
- Need help with the website? [Contact Us](#) by email
- [Review](#) the Open Payments Privacy Policy [PDF, 102 KB]

Step 3: Select “Accept/Reject Nominations.”

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](#)

My Profile

Karen Miller

[Overview](#) [My Profile Details](#) [My Roles & Nominations](#)

Below are the user roles for each teaching hospital with which you are affiliated. You have the option to accept roles for which you have been nominated or request additional roles for each teaching hospital(s) with which you are affiliated.

[Accept/Reject Nominations](#) [Request a Role](#)

My Roles

Role:	Name:	Status:	Actions:
Authorized Official	WXYZ Teaching Hospital	Vetted	Modify



- [Access](#) the Open Payments User Guide
- Need help with the website? [Contact Us](#) by email
- [Review](#) the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 4: Select your user type from the drop-down and enter the registration ID and nomination ID in the appropriate fields. When complete, select "Show Nomination."

The screenshot displays the 'Open Payments (Sunshine Act)' web application interface. At the top, there is a navigation bar with tabs for 'Home', 'Review and Dispute', 'Manage Teaching Hospitals', 'My Profile', and 'Help'. Below this is a 'Create Profile' sidebar with steps: 'Select Profile Type', 'Register Entity', 'Search Nomination', 'Personal Information', and 'Review and Submit Profile'. The main content area is titled 'Enter Registration & Nomination ID'. It includes instructions: 'A field with an asterisk (*) is required. From the dropdown list below, select your User Type. Enter the Registration ID and Nomination ID provided in the nomination email notification you should have received. Select "Show Nomination" to see the information associated with your nomination.' The form contains a 'User Type' dropdown menu set to 'Teaching Hospital', a 'Registration ID' field with the value '100000080019', and a 'Nomination ID' field with the value '253234891617'. A red arrow points to the 'Show Nomination' button, which is highlighted with a yellow border. A 'Cancel' button is located at the bottom left of the form area.

Open Payments User Guide

Step 5: Review the nomination information displayed. If the information is correct, select “Continue.” If the information is incorrect, select “Cancel” and contact the teaching hospital directly.

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

Create Profile

- Select Profile Type
- Register Entity
 - Search Nomination**
 - Entity Information
 - Confirm Nomination
- Personal Information
- Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Enter Registration & Nomination ID

A field with an asterisk (*) is required.
From the dropdown list below, select your User Type.

Enter the Registration ID and Nomination ID provided in the nomination email notification you should have received.
Select "Show Nomination" to see the information associated with your nomination.

***User Type**
Teaching Hospital

***Registration ID:** The ID is a 12-digit number
10000080019

***Nomination ID:** The ID is a 12-digit number
25324891617

Show Nomination

Below is the information associated with the nomination.
Select "Continue" if the information displayed on the screen is correct.
Select "Cancel" to return to the Registration ID and Nomination ID page if the information displayed is incorrect.

Karen Miller was nominated as Authorized Representative for
User Type: **Teaching Hospital**
Teaching Hospital Doing Business As Name: **ABCDE Teaching Hospital**

Cancel | Continue

Open Payments User Guide

Step 6: Select “Yes, I accept the role of” if you wish to accept the role or “No, I do not accept” if you do not wish to accept the role. If you accept the role and select “Continue,” you will continue the nomination confirmation process.

If you reject the role for which you have been nominated, select “Continue” after selecting “No, I do not accept” for the role. The system will ask you if you are sure you want to reject this role. If you confirm your choice to reject the role, you will exit the system and the nominator will receive an email that you rejected the nomination. The nominator will then be allowed to nominate another individual for the role.

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

Create Profile

- Select Profile Type
- Teaching Hospital: Search
- Search Nomination
- Confirm Nomination**
- Personal Information
- Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

Confirm Nomination

A field with an asterisk (*) is required.

Review the teaching hospital information below to ensure this is the teaching hospital you wish to affiliate with. Accept or reject your nominated role(s) by selecting the corresponding radio button below. Select “Continue” to review and complete your user profile.

ABCDE Teaching Hospital

7500 Security Blvd
Baltimore, MD 21244

TIN 123456789

***Confirm Nomination:**

- Yes, I accept the role of **Authorized Representative:** Granted permission by the teaching hospital's authorized official to access/review data, initiate a dispute on behalf of the teaching hospital and make/approve nominations for other users.
- No, I do not accept

Cancel | Back | **Continue**

Open Payments User Guide

Step 7: Review your personal information and enter in any additional required fields. Select “Continue” to proceed.

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](#)

Create Profile

- ✓ Select Profile Type
- ✓ Teaching Hospital: Search
- ③ **Personal Information**
- ④ Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? **Contact Us** by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

3 Personal Information

A field with an asterisk (*) is required.

Add the requested personal and business information to your user profile. Also, review any pre-populated information for accuracy and correct any invalid information.

Note that changes made here will **not** automatically update your profile information in your other CMS accounts, such as your Medicare, National Plan & Provider Enumeration System (NPPES), or Enterprise Identity Management (EIDM) accounts.

Your Name

*First Name: Karen	*Last Name: Miller
Middle Name:	Suffix (Jr., Sr., etc.):

Business Address

*Job Title: Director		
*Business Email Address: openpayments@yopmail.com	*Business Telephone Number: 999-999-9999 555-555-5555	
*Business Address, Line 1: 7500 Security Blvd		
Business Address, Line 2:		
*City Name: Baltimore	*State: Maryland	*Zip Code: 99999 9999 21244

Open Payments User Guide

Step 8: Review the information you have entered. To correct any errors, select the “Back” button at the bottom of the page to return to previous pages and make your corrections. If the information is correct, select “Continue.”

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](#)

Create Profile

- ✓ Select Profile Type
- ✓ Teaching Hospital: Search
- ✓ Personal Information
- 4 Review and Submit Profile**

Access the Open Payments User Guide

Need help with the website? **Contact Us** by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

4 Review and Submit Profile

Review the information entered in the previous sections.

Select “Back” to navigate to the previous page(s) and correct any incorrect information. Select “Continue” to submit your profile.

ABCDE Teaching Hospital

Teaching Hospital Business Address:	7500 Security Blvd Baltimore, MD 21244
Taxpayer Identification Number (TIN):	123456789
Your Role:	Authorized Representative
First Name:	Karen
Middle Name:	
Last Name:	Miller
Suffix (Jr., Sr., etc.):	
Business Email Address:	openpayments@yopmail.com
Business Telephone Number:	555-555-5555
Job Title:	Director
Business Address, Line 1:	7500 Security Blvd
Business Address, Line 2:	
City Name:	Baltimore
State:	Maryland
Zip Code:	21244

Nominations:

Role:	First Name:	Last Name:	Business Email Address:	Business Telephone Number:
Authorized Representative	Karen	Miller	openpayments@yopmail.com	555-555-5555
Authorized Representative	Joe	Smith	openpayments@yopmail.com	555-555-5555

[Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

The following message will appear on-screen to confirm your nomination has been successfully accepted.

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
----------------------	---------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------	----------------------

Create Profile

- ✓ Select Profile Type
- ✓ Teaching Hospital: Search
- ✓ Personal Information
- ✓ Review and Submit Profile

-  **Access** the Open Payments User Guide
-  Need help with the website?
Contact Us by email
-  **Review** the Open Payments Privacy Policy [PDF, 102 KB]

Success Confirmed

You have successfully accepted your affiliation with ABCDE Teaching Hospital

You may now:

- [Go to Open Payments Home](#)

Note: Based on your user role, you now will be able to take actions related to this teaching hospital in the system.

Open Payments User Guide

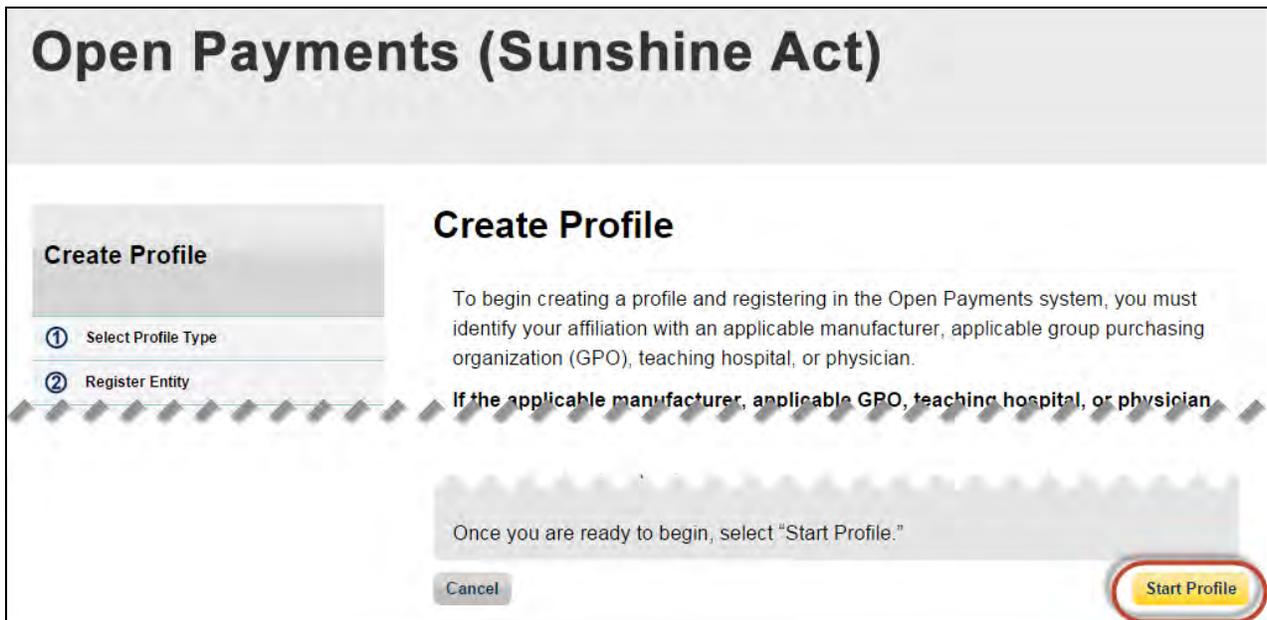
6.5g: Self-Nomination: Requesting a Role (Teaching Hospital - First Time System Users)

If you are a first time user and would like to self-nominate for a teaching hospital role as an authorized official or authorized representative, follow the steps below.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page. The on-screen text contains important information regarding the registration process. Read the on-screen text and select “Create My Profile” when you are ready to begin the registration process.



Step 2: The on-screen text contains important information regarding creating the physician and individual profile. Read the on-screen text and select “Start Profile” at the bottom of the page when you are ready to continue.



Open Payments User Guide

Step 3: Select the profile type "Teaching Hospital." When finished, select "Continue."

Open Payments (Sunshine Act)

Create Profile

- 1 Select Profile Type
- 2 Register Entity
- 3 Personal Information
- 4 Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Select Profile Type

A field with an asterisk (*) is required.

If you do not have a registration ID and/or nomination ID, begin creating your profile by indicating below whether you are affiliated with an applicable manufacturer or applicable GPO, teaching hospital, or physician.

If you received a registration ID and/or nomination ID in an email notifying you of your nomination role, you may begin creating your profile by selecting the "I have a Registration ID and Nomination ID" link.

Note that if you wish to register as a physician authorized representative, you must have a nomination ID. You cannot nominate yourself for a physician authorized representative role.

If you are a physician that is affiliated with a teaching hospital, you should register yourself as a physician and not as a teaching hospital. Physicians can view records submitted about them only if they register themselves as physicians. Registering as a teaching hospital will allow you to view only records submitted about the teaching hospital. If you have any questions regarding the user type you should register as, please contact the Open Payments Help Desk (openpayments@cms.hhs.gov) for guidance.

***Required: Select the type of entity or covered recipient you are affiliated with OR the "I have a Registration and Nomination ID" link.**

- Applicable manufacturer or applicable group purchasing organization (GPO)
- Physician
- Teaching hospital

----- OR -----

[I have a Registration ID and Nomination ID](#)

Open Payments User Guide

Step 4: Search the database for the correct teaching hospital. Select the teaching hospital's state, name, business address, and Taxpayer Identification Number (TIN) from the drop-downs. When finished, select "Search."

Open Payments (Sunshine Act)

Create Profile

Select Profile Type

- 2 Teaching Hospital: Search
- 3 Personal Information
- 4 Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? **Contact Us** by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Search

A field with an asterisk (*) is required.

To register your teaching hospital for the current program year, select the correct information from each of the dropdown fields below and select "Search." If your teaching hospital is not listed in the search results, select "Register for Prior Program Year" to continue with registration.

The teaching hospital list is updated annually by CMS. The [teaching hospital list](#) for the current program year, along with the list for previous program years, can be found on the [CMS Open Payments website](#). If you do not find your teaching hospital listed, contact the Open Payments Help Desk at (openpayments@cms.hhs.gov) for assistance.

The user who registers a teaching hospital in the Open Payments system must take the role of authorized official for that hospital. The authorized official is responsible for registering the teaching hospital in the Open Payments system. The authorized official may also nominate other users, modify existing user roles, approve or deny nominations made by others, and approve or deny requests for user roles made by others.

Note: If you are a physician who is affiliated with a teaching hospital, you may proceed to view payments made to this teaching hospital, however you must also register as a physician to view payments made to you as a physician.

[Register for Prior Program Year](#)

*State Where Teaching Hospital is Located:
Maryland

*Teaching Hospital Doing Business As Name:
ABCDE Teaching Hospital

*Taxpayer Identification Number (TIN):
123456789

*Teaching Hospital Business Address:
7500 Security Blvd Baltimore MD 21244

Search

Cancel **Back**

Open Payments User Guide

Step 5: Review the returned information displayed on the page. Select “Continue” if the information displayed is correct. If the information is not correct, select the “Back” button at the bottom of the page to return to the previous page and edit the search information you entered.

Open Payments (Sunshine Act)

Create Profile

Select Profile Type

- 2 Teaching Hospital: Search
- 3 Personal Information
- 4 Review and Submit Profile

[Access the Open Payments User Guide](#)

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

[Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)

2 Teaching Hospital: Search

A field with an asterisk (*) is required.

To register your teaching hospital for the current program year, select the correct information from each of the dropdown fields below and select “Search.” If your teaching hospital is not listed in the search results, select “Register for Prior Program Year” to continue with registration.

The teaching hospital list is updated annually by CMS. The [teaching hospital list](#) for the current program year, along with the list for previous program years, can be found on the [CMS Open Payments website](#). If you do not find your teaching hospital listed, contact the Open Payments Help Desk at openpayments@cms.hhs.gov for assistance.

The user who registers a teaching hospital in the Open Payments system must take the role of authorized official for that hospital. The authorized official is responsible for registering the teaching hospital in the Open Payments system. The authorized official may also nominate other users, modify existing user roles, approve or deny nominations made by others, and approve or deny requests for user roles made by others.

Note: If you are a physician who is affiliated with a teaching hospital, you may proceed to view payments made to this teaching hospital, however you must also register as a physician.

[Register for Prior Program Year](#)

*State Where Teaching Hospital is Located:
Maryland

*Teaching Hospital Doing Business As Name:
ABCDE Teaching Hospital

*Taxpayer Identification Number (TIN):
123456789

*Teaching Hospital Business Address:
7500 Security Blvd Baltimore MD 21244

[Search](#)

Teaching Hospital Search Results

This teaching hospital is already registered in the Open Payments system:

ABCDE Teaching Hospital
7500 Security Blvd
Baltimore, MD 21244
TIN: 123456789

If this is the correct teaching hospital, select “Continue” to affiliate yourself with this teaching hospital. If this is not the teaching hospital you wish to affiliate yourself with, change the search criteria above to search for another teaching hospital.

[Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

Step 6: Review the information displayed on the page. If the information is correct, select “Continue.” If the information is not correct, select the “Back” button at the bottom of the page to select a different teaching hospital.

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ② Teaching Hospital: Search
- Register Teaching Hospital**
Your Role
- ③ Personal Information
- ④ Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website?
Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Register Teaching Hospital

Review the teaching hospital information below to ensure this is the teaching hospital you wish to affiliate with. Accept or reject your nominated role(s) by selecting the corresponding radio button below. Select “Continue” to review and complete your user profile.

ABCDE Teaching Hospital

Business Address: 7500 Security Blvd Baltimore, MD 21244	Taxpayer Identification Number (TIN): 123456789
-----------------------------------------------------------------------	-----------------------------------------------------------

Open Payments User Guide

Step 7: Select the role you wish to nominate yourself for in the teaching hospital. Then enter in the role-related information in the data fields. Required fields are marked with an asterisk. Once you have entered in all of the information, select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- Select Profile Type
- Teaching Hospital: Search
- Register Teaching Hospital
- Your Role**
- Personal Information
- Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Your Role

A field with an asterisk (*) is required.

To register a teaching hospital, you must select the role of authorized official of the teaching hospital. In addition to registering the teaching hospital, the authorized official is responsible for approving all nominations and modifying other user roles for the teaching hospital.

***Choose your role:**
Select the role of "Authorized Official" to proceed with registering the teaching hospital.

- Authorized Official:** Responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.
- Authorized Representative:** Granted permission by the teaching hospital's authorized official to access/review data, initiate a dispute on behalf of the teaching hospital and make/approve nominations for other users.

Your Role-Related Information

Enter your personal information below.

*First Name: Susan	Middle Name:
*Last Name: Jones	Suffix (Jr., Sr., etc.):
*Email Address: openpayments@yopmail.com	*Business Phone: 999-999-9999 555-555-5555

Cancel Back Continue

Open Payments User Guide

Step 8: Review your information displayed on the page. Enter your job title and business address. When finished, select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ✓ Teaching Hospital: Search
- 3 Personal Information**
- 4 Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

3 Personal Information

A field with an asterisk (*) is required.

Add the requested personal and business information to your user profile. Also, review any pre-populated information for accuracy and correct any invalid information.

Note that changes made here will **not** automatically update your profile information in your other CMS accounts, such as your Medicare, National Plan & Provider Enumeration System (NPPE), or Enterprise Identity Management (EIDM) accounts.

Your Name

*First Name:	*Last Name:
Susan	Jones
Middle Name:	Suffix (Jr., Sr., etc.):

Business Address

*Job Title:		
Director		
*Business Email Address:	*Business Telephone Number:	
openpayments@yopmail.com	999-999-9999 555-555-5555	
*Business Address, Line 1:		
7500 Security Blvd		
Business Address, Line 2:		
*City Name:	*State:	*Zip Code:
Baltimore	Maryland	99999 9999 21244

Cancel Back Continue

Open Payments User Guide

Step 9: Review your profile information on the “Review and Submit Profile” page. Select the “Back” button at the bottom of the page to go back and edit any information. Once you have reviewed the information and determined it to be correct, select “Continue.”

Open Payments (Sunshine Act)

Create Profile

- ✓ Select Profile Type
- ✓ Teaching Hospital: Search
- ✓ Personal Information
- ④ Review and Submit Profile

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

4 Review and Submit Profile

Review the information entered in the previous sections.

Select “Back” to navigate to the previous page(s) and correct any incorrect information. Select “Continue” to submit your profile.

ABCDE Teaching Hospital

Teaching Hospital Business Address:	7500 Security Blvd Baltimore MD 21244
Taxpayer Identification Number (TIN):	123456789
Your Role:	Authorized Official
First Name:	Susan
Middle Name:	
Last Name:	Jones
Suffix (Jr., Sr., etc.):	
Business Email Address:	openpayments@yopmail.com
Business Telephone Number:	555-555-5555
Job Title:	Director
Business Address, Line 1:	7500 Security Blvd
Business Address, Line 2:	
City Name:	Baltimore
State:	Maryland
Zip Code:	21244

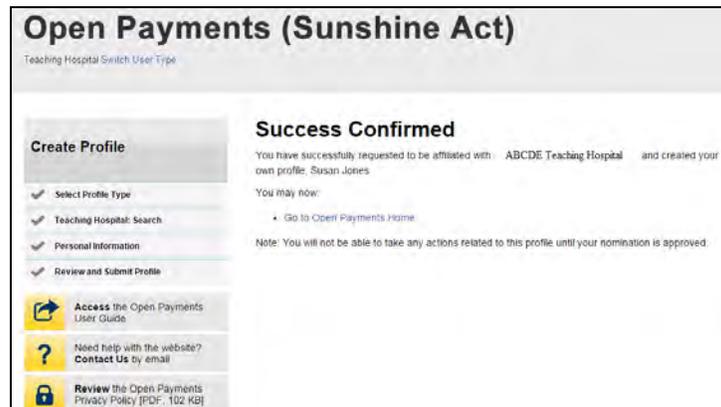
Nominations:

Role:	First Name:	Last Name:	Business Email Address:	Business Telephone Number:
Authorized Official	Susan	Jones	openpayments@yopmail.com	555-555-5555

Open Payments User Guide

The following message will appear on-screen to confirm your profile has been successfully created. You will receive an email when your nomination is approved. Also, the authorized officials for the teaching hospital will receive emails notifying them of your request for a user role.

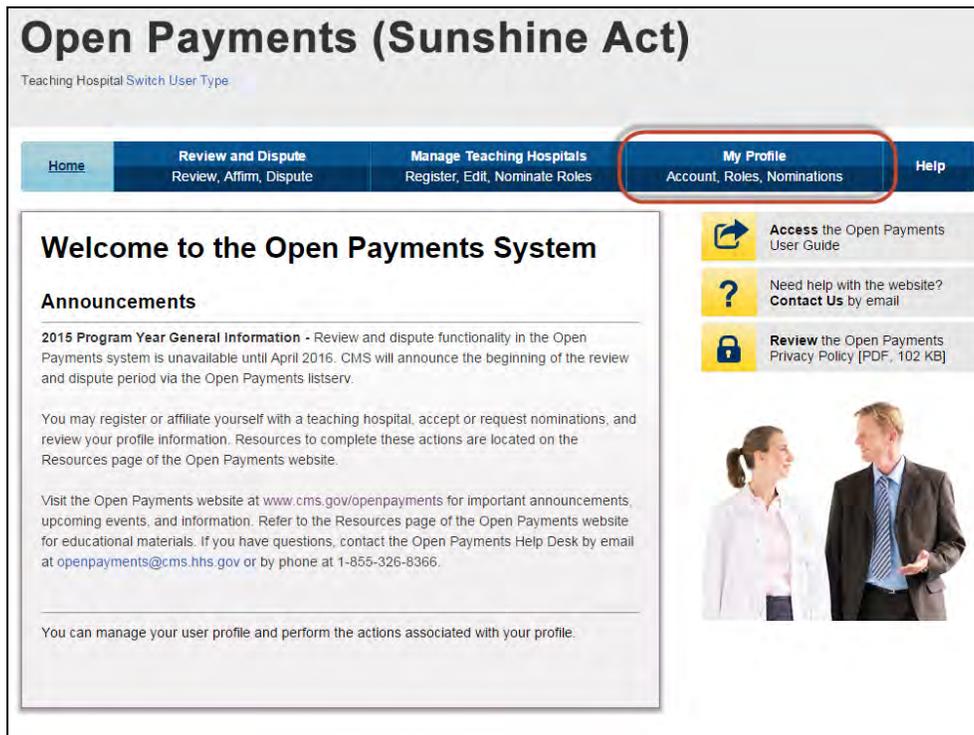
If you are nominating yourself for a role with a teaching hospital that has already been registered but which lacks an active authorized official to approve your self-nomination, please contact the Open Payments Help Desk at openpayments@cms.hhs.gov.



6.5h: Self-Nomination: Requesting a Role (Teaching Hospital - Returning System Users)

If you would like to self-nominate for a teaching hospital role as an authorized official or authorized representative, and already have a profile in the Open Payments system, follow the steps below.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page. Select the "My Profile" tab.



Open Payments User Guide

Step 2: Select the “My Roles and Nominations” tab.

The screenshot shows the 'Open Payments (Sunshine Act)' dashboard for a 'Teaching Hospital Switch User Type'. The navigation bar includes 'Home', 'Review and Dispute', 'Manage Teaching Hospitals', 'My Profile', and 'Help'. The 'My Profile' section is active, showing the user's name 'John Miller' and three tabs: 'Overview', 'My Profile Details', and 'My Roles & Nominations', which is highlighted with a red circle. Below the tabs, a text box states: 'The page contains information about your profile and user roles.' The 'Profile Name' is 'John Miller'. Under 'Your Authorized Roles', a table lists one role: 'Authorized Official' at 'ABCDE Teaching Hospital' with a 'Vetted' status. On the right, there are three utility buttons: 'Access the Open Payments User Guide', 'Need help with the website? Contact Us by email', and 'Review the Open Payments Privacy Policy [PDF, 102 KB]'. An image of a man and a woman in professional attire is visible in the bottom right corner.

Step 3: From the “My Roles and Nominations” tab, select the “Request a Role” button.

This screenshot shows the same dashboard as Step 2, but with the 'My Roles & Nominations' tab selected. The text below the tabs reads: 'Below are the user roles for each teaching hospital with which you are affiliated. You have the option to accept roles for which you have been nominated or request additional roles for each teaching hospital(s) with which you are affiliated.' The 'My Roles' table now includes an 'Actions' column with a 'Request a Role' button highlighted by a red circle. The table data is as follows:

Role:	Name:	Status:	Actions:
Authorized Official	ABCDE Teaching Hospital	Vetted	Request a Role Modify

The 'Request a Role' button is highlighted with a red circle. The 'Modify' button is also visible. The rest of the interface, including the navigation bar and utility buttons, remains the same as in Step 2.

Open Payments User Guide

Step 4: Search the database for the correct teaching hospital. To do so, select the teaching hospital's state, name, business address, and Taxpayer Identification Number (TIN) from the drop-downs. When finished, select "Search."

Open Payments (Sunshine Act)
Teaching Hospital Switch User Type

Create Profile

Select Profile Type

- 2 Teaching Hospital: Search
- 3 Personal Information
- 4 Review and Submit Profile

Access the Open Payments User Guide

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF, 102 KB]

2 Teaching Hospital: Search

A field with an asterisk (*) is required.

To register your teaching hospital for the current program year, select the correct information from each of the dropdown fields below and select "Search." If your teaching hospital is not listed in the search results, select "Register for Prior Program Year" to continue with registration.

The teaching hospital list is updated annually by CMS. The [teaching hospital list](#) for the current program year, along with the list for previous program years, can be found on the [CMS Open Payments website](#). If you do not find your teaching hospital listed, contact the Open Payments Help Desk at openpayments@cms.hhs.gov for assistance.

The user who registers a teaching hospital in the Open Payments system must take the role of authorized official for that hospital. The authorized official is responsible for registering the teaching hospital in the Open Payments system. The authorized official may also nominate other users, modify existing user roles, approve or deny nominations made by others, and approve or deny requests for user roles made by others.

Note: If you are a physician who is affiliated with a teaching hospital, you may proceed to view payments made to this teaching hospital, however you must also register as a physician to view payments made to you as a physician.

[Register for Prior Program Year](#)

*State Where Teaching Hospital is Located:
Maryland

*Teaching Hospital Doing Business As Name:
XYZ Teaching Hospital

*Taxpayer Identification Number (TIN):
345678901

*Teaching Hospital Business Address:
7500 Security Blvd Baltimore MD 21244

Search

Cancel Back

Open Payments User Guide

Step 5: Review the returned information displayed on the page. Select “Continue” if the information displayed is correct. If the information is not correct, select the “Back” button at the bottom of the page to return to the previous page and edit the search information you entered.

Open Payments (Sunshine Act)

Teaching Hospital Switch User Type

Create Profile

Select Profile Type

- 2 Teaching Hospital: Search
- 3 Personal Information
- 4 Review and Submit Profile

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2 Teaching Hospital: Search

A field with an asterisk (*) is required.

To register your teaching hospital for the current program year, select the correct information from each of the dropdown fields below and select “Search.” If your teaching hospital is not listed in the search results, select “Register for Prior Program Year” to continue with registration.

The teaching hospital list is updated annually by CMS. The teaching hospital list for the current program year, along with the list for previous program years, can be found on the [CMS Open Payments website](#). If you do not find your teaching hospital listed, contact the Open Payments Help Desk at openpayments@cms.hhs.gov for assistance.

The user who registers a teaching hospital in the Open Payments system must take the role of authorized official for that hospital. The authorized official is responsible for registering the teaching hospital in the Open Payments system. The authorized official may also nominate other users, modify existing user roles, approve or deny nominations made by others, and approve or deny requests for user roles made by others.

Note: If you are a physician who is affiliated with a teaching hospital, you may proceed to view payments made to this teaching hospital, however you must also register as a physician to view payments made to you as a physician.

[Register for Prior Program Year](#)

*State Where Teaching Hospital is Located:
Maryland

*Teaching Hospital Doing Business As Name:
XYZ Teaching Hospital

*Taxpayer Identification Number (TIN):
345678901

*Teaching Hospital Business Address:
7500 Security Blvd Baltimore MD 21244

[Search](#)

Teaching Hospital Search Results

This teaching hospital is already registered in the Open Payments system:

XYZ Teaching Hospital
7500 Security Blvd
Baltimore, MD 21244
TIN: 345678901

If this is the correct teaching hospital, select “Continue” to affiliate yourself with this teaching hospital. If this is not the teaching hospital you wish to affiliate yourself with, change the search criteria above to search for another teaching hospital.

[Cancel](#) [Back](#) [Continue](#)

Open Payments User Guide

Step 6: Review the teaching hospital information. If the information is correct, select “Continue.” If the information is not correct, select the “Back” button at the bottom of the page to select a different teaching hospital.

Open Payments (Sunshine Act)

Teaching Hospital Switch User Type

Create Profile

- ✓ Select Profile Type
- ② Teaching Hospital: Search
 - Register Teaching Hospital**
Your Role
- ③ Personal Information
- ④ Review and Submit Profile

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2 Teaching Hospital: Register Teaching Hospital

Review the teaching hospital information below to ensure this is the teaching hospital you wish to affiliate with. Accept or reject your nominated role(s) by selecting the corresponding radio button below. Select “Continue” to review and complete your user profile.

XYZ Teaching Hospital

Business Address: 7500 Security Blvd Baltimore, MD 21244	Taxpayer Identification Number (TIN): 345678901
-----------------------------------------------------------------------	-----------------------------------------------------------

Open Payments User Guide

Step 7: Select the role you wish to nominate yourself for in the teaching hospital. Then enter in the role-related information in the data fields. Required fields are marked with an asterisk. Once you have entered in all of the information, select "Continue."

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

Create Profile

- Select Profile Type
- Teaching Hospital: Search
- Register Teaching Hospital
- Your Role**
- Personal Information
- Review and Submit Profile

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2 Teaching Hospital: Your Role

A field with an asterisk (*) is required.

To register a teaching hospital, you must select the role of authorized official of the teaching hospital. In addition to registering the teaching hospital, the authorized official is responsible for approving all nominations and modifying other user roles for the teaching hospital.

***Choose your role:**
Select the role of "Authorized Official" to proceed with registering the teaching hospital.

- Authorized Official:** Responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.
- Authorized Representative:** Granted permission by the teaching hospital's authorized official to access/review data, initiate a dispute on behalf of the teaching hospital and make/approve nominations for other users.

Your Role-Related Information

Enter your personal information below.

*First Name: John	Middle Name:
*Last Name: Miller	Suffix (Jr., Sr., etc.):
*Email Address: openpayments@yopmail.com	*Business Phone: 999-999-9999 555-555-5555

Cancel | Back | **Continue**

Open Payments User Guide

Step 8: Review your profile information on the “Review and Submit Profile” page. Select the “Back” button at the bottom of the page to go back and edit any information. Once you have reviewed the information and determined it to be correct, select “Continue.”

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**

Create Profile

- ✓ Select Profile Type
- ✓ Teaching Hospital: Search
- ✓ Personal Information
- 4 Review and Submit Profile**

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4 Review and Submit Profile

Review the information entered in the previous sections.

Select "Back" to navigate to the previous page(s) and correct any incorrect information. Select "Continue" to submit your profile.

XYZ Teaching Hospital

Teaching Hospital Business Address:	7500 Security Blvd Baltimore MD 21244
Taxpayer Identification Number (TIN):	34567890
Your Role:	Authorized Official
First Name:	John
Middle Name:	
Last Name:	Miller
Suffix (Jr., Sr., etc.):	
Business Email Address:	openpayments@yopmail.com
Business Telephone Number:	555-555-5555
Job Title:	Director
Business Address, Line 1:	7500 Security Blvd
Business Address, Line 2:	
City Name:	Baltimore
State:	Maryland
Zip Code:	21244

Nominations:

Role:	First Name:	Last Name:	Business Email Address:	Business Telephone Number:
Authorized Official	John	Miller	openpayments@yopmail.com	555-555-5555

Open Payments User Guide

The following message will appear on-screen to confirm your profile has been successfully created. You will receive an email when your nomination is approved. Also, the authorized officials for the teaching hospital will receive emails notifying them of your request for a user role.

If you are nominating yourself for a role with a teaching hospital that has already been registered but which lacks an active authorized official to approve your self-nomination, please contact the Open Payments Help Desk at openpayments@cms.hhs.gov.



6.5i: Approving a Nomination (Authorized Official Only)

If you are an authorized official for a teaching hospital and would like to approve a nomination, follow the steps below.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page. Select “Manage Teaching Hospitals.”



Open Payments User Guide

Step 2: On the “Manage Teaching Hospitals” page, select the teaching hospital for which you want to confirm a nomination.

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

Manage Teaching Hospitals

Below are the teaching hospitals with which you are affiliated. To view details and manage user roles, select a teaching hospital from the list below. You may also register a new teaching hospital by selecting "Register New Teaching Hospital."

[Register New Teaching Hospital](#)

Your Teaching Hospitals

Doing Business As (DBA) Name	TIN	Address	Status
XYZ Teaching Hospital	34-5678901	7500 Security Blvd Baltimore MD 21244	Registered

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Step 3: Select the “Manage Roles” tab.

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

XYZ Teaching Hospital

Teaching Hospital Information | **Manage Roles**

Below are the details for the teaching hospital you selected, listed by program year.

XYZ Teaching Hospital

Taxpayer Identification Number (TIN): 34-5678901

Teaching Hospital History

Program Year	TIN	DBA Name	Legal Name	Cost Report Address	NPPES Address
2015	34-5678901	XYZ Teaching Hospital	XYZ Teaching Hospital	7500 Security Blvd Baltimore MD 21244	7500 Security Blvd Baltimore MD 21244
2014	34-5678901	XYZ Teaching Hospital	XYZ Teaching Hospital	7500 Security Blvd Baltimore MD 21244	7500 Security Blvd Baltimore MD 21244
2013	34-5678901	XYZ Teaching Hospital	XYZ Teaching Hospital	7500 Security Blvd Baltimore MD 21244	7500 Security Blvd Baltimore MD 21244

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Open Payments User Guide

Step 4: Select “Approve” for the nomination you wish to approve. Once you have selected the “Approve” button next to a nominee’s name, the nomination has been approved. The nominee will receive an email notification informing them of the acceptance of their nomination.

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

XYZ Teaching Hospital

Teaching Hospital Information | Manage Roles

Below is the list of nominations for the teaching hospital. You may have up to 10 active users for this teaching hospital, 5 of which can be authorized officials. Select one of the actions (i.e. "Modify", "Approve") to update or approve the roles. Select "Nominate New Role" to create a new nomination.

[Nominate New Role](#)

Name:	Role:	Status:	Actions:
James Jones	Authorized Official	Vetted	
John Miller	Authorized Official	Requested	Approve
Mary Davis	Authorized Official	Nomination Approved	Modify

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Open Payments User Guide

Step 4a: When you select the “Modify” button next to a nominee’s name, you can change that individual’s role. You can also remove a nomination, and reject a user’s self-nomination. When modifications are complete, select “Save Role.”

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](#)

XYZ Teaching Hospital

[Teaching Hospital Information](#) | [Manage Roles](#)

Modify Role

Nominee

A field with an asterisk (*) is required.

Make any edits to the person's role below. The person will be notified of changes in his or her role.

***First Name:** **Middle Name:**

***Last Name:** **Suffix (Jr., Sr., etc.):**

***Email Address:** ***Business Phone:**

***Indicate the role this person will have:**

Authorized Official: Responsible for registering the teaching hospital in the Open Payments system. Authorized officials may nominate other users, or modify existing user roles. They are also responsible for approving/denying nominations made by others, and approving/denying requests for user roles made by others.

Authorized Representative: Granted permission by the teaching hospital's authorized official to access/review data, initiate a dispute on behalf of the teaching hospital and make/approve nominations for other users.

Business Address, Line 1:

Business Address, Line 2:

City Name: **State:** **Zip Code:**

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Open Payments User Guide

Step 5: You will now see an updated list of nominations on the “Manage Roles” tab.

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](#)

XYZ Teaching Hospital

[Teaching Hospital Information](#) | [Manage Roles](#)

Below is the list of nominations for the teaching hospital. You may have up to 10 active users for this teaching hospital, 5 of which can be authorized officials. Select one of the actions (i.e. "Modify", "Approve") to update or approve the roles. Select "Nominate New Role" to create a new nomination.

[Nominate New Role](#)

Name:	Role:	Status:	Actions:
James Jones	Authorized Official	Vetted	
John Miller	Authorized Official	Approved	←
Mary Davis	Authorized Official	Nomination Approved	Modify

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Section 6.6: Updating Profile Information in the Open Payments System

Physician and teaching hospital profiles can be kept current by updating them as information changes. The steps for profile updates are given below.

6.6a: Updating a Physician Profile as an Authorized Representative

For a physician's authorized representative who holds the level of access of "Modify Profile" to edit their physician's profile, follow these steps.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials, navigate to the Open Payments home page, and select the "Manage Physicians" tab.

Open Payments (Sunshine Act)
Physician Switch User Type

Home Review and Dispute (Review, Affirm, Dispute) **Manage Physicians** (Register, Edit, Nominate Roles) My Profile (Account, Roles, Nominations) Help

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - Review and dispute functionality in the Open Payments system is unavailable until April 2016. CMS will announce the beginning of the review and dispute period via the Open Payments listserv.

You may register or affiliate yourself with a teaching hospital, accept or request nominations, and review your profile information. Resources to complete these actions are located on the Resources page of the Open Payments website.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

You can manage your user profile and perform the actions associated with your profile. Note: In order to be able to review all records submitted for you, you must have entered your NPI, if available, and all state licenses under your profile details in Open Payments system.

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Open Payments User Guide

Step 2: Select the physician for which you wish to make updates on the “Manage Physicians” page.

Open Payments (Sunshine Act)
Physician Switch User Type

Home Review and Dispute (Review, Affirm, Dispute) **Manage Physicians** (Register, Edit, Nominate Roles) My Profile (Account, Roles, Nominations) Help

Manage Physicians

Looking for a way to register a reporting entity or teaching hospital?
>> Go to Switch User Type

Physicians You Represent

Any physicians who have listed you as an authorized representative are shown below. Depending on the access level the physician gives to you, your ability to take actions on their behalf might be limited. You can always view the physician's profile or see the records reported for them. If allowed, you might also be able to update the physician's profile or to dispute reported payments, other transfers of value, or ownership and investment interests.

Physicians who have approved you as an authorized representative

Name:	Date Confirmed:
Susan Jones	12/16/2015

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Open Payments User Guide

Step 3: Select the “Physician’s Profile Details” tab to view the profile information for the selected physician. You will be able to view the physician’s personal information, physician information, and the physician’s authorized representative information. Select “Update Profile” to begin making updates.

Open Payments (Sunshine Act)

Physician Switch User Type

[Home](#) [Review and Dispute](#) [Manage Physicians](#) [My Profile](#) [Help](#)
Review, Affirm, Dispute Register, Edit, Nominate Roles Account, Roles, Nominations

Susan Jones

[Overview](#) [Physician's Profile Details](#) [Physician's Roles](#)

The physician's profile information is shown below. [Update Profile](#)

Personal Information	Physician's Authorized Representative
Name: Susan Jones	Authorized Representative: Mary Davis
Business Email Address: openpayments@yopmail.com	Business Email Address: openpayments@yopmail.com
Business Telephone Number: 555-555-5555	Business Telephone Number: 555-555-5555
Physician Primary Type: Medical Doctor	Job Title: Office Manager
National Provider Identifier (NPI): 1234567890	Business Address: 7500 Security Blvd Baltimore, MD 21244
Drug Enforcement Administration (DEA) Number:	Access Level: Edit Physician profile Review Data (Read-Only) Dispute Data
Taxonomy Codes: 1 Allopathic & Osteopathic Physicians Anesthesiology	
State Licenses: Indiana License 1234567890	



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Open Payments User Guide

Step 4: Update the necessary information. When your updates are complete, select “Save Updates.”

The screenshot displays the 'Open Payments (Sunshine Act)' interface for a 'Physician Switch User Type'. The user is identified as Susan Jones. The interface includes a navigation menu with options: Home, Review and Dispute (Review, Affirm, Dispute), Manage Physicians (Register, Edit, Nominate Roles), My Profile (Account, Roles, Nominations), and Help. The 'Physician's Profile' section is active, showing tabs for Overview, Physician's Profile Details, and My Roles & Nominations. The 'Personal Information' form contains the following fields: First Name (Susan), Middle Name, Last Name (Jones), and Suffix (Jr., Sr., etc.). A note states: 'A field with an asterisk (*) is required.' Below this, there are fields for City Name (Baltimore), State (Maryland), and Zip Code (21244). A 'Save Updates' button is highlighted with a red circle. To the right, there are three utility links: 'Access the Open Payments User Guide', 'Need help with the website? Contact Us by email', and 'Review the Open Payments Privacy Policy [PDF, 102 KB]'. A small image of a man and a woman is also visible on the right side of the profile area.

Note: Any updates made to the physicians profile will cause the physician to be re-vetted. Once the updated information has been re-vetted, both the physician and authorized official will be able to perform the necessary actions in the Open Payments system. See Section 6.3c for information on physician vetting.

Open Payments User Guide

6.6b: Updating Physician or Physician Authorized Representative Personal Profile

As a user of the Open Payments system, you have the ability to update your personal profile information. You will be able to update your name, business email address, business telephone number, job title, and business address. Steps for updating your profile are explained below.

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials, navigate to the Open Payments home page, and select the “My Profile” tab.

Open Payments (Sunshine Act)
Physician Switch User Type

Home Review and Dispute (Review, Affirm, Dispute) Manage Physicians (Register, Edit, Nominate Roles) **My Profile (Account, Roles, Nominations)** Help

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - Review and dispute functionality in the Open Payments system is unavailable until April 2016. CMS will announce the beginning of the review and dispute period via the Open Payments listserv.

You may register or affiliate yourself with a teaching hospital, accept or request nominations, and review your profile information. Resources to complete these actions are located on the Resources page of the Open Payments website.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

You can manage your user profile and perform the actions associated with your profile. Note: In order to be able to review all records submitted for you, you must have entered your NPI, if available, and all state licenses under your profile details in Open Payments system.

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Open Payments User Guide

Step 2: Select the “My Profile Details” tab. You will be able to view your existing profile information. Select “Update Profile” to begin making edits and/or updates.

Open Payments (Sunshine Act)

Physician Switch User Type

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

My Profile

John Miller Medical Doctor

[Overview](#) [My Profile Details](#) [My Roles & Nominations](#)

To update your profile details, including adding or updating authorized representative information, select the “Update Profile” button.

[Update Profile](#)

Personal Information

Name: John Miller	Physician Practice Name:
Business Email Address: openpayments@yopmail.com	Physician Practice Business Address: 7500 Security Blvd Baltimore, MD 21244
Business Telephone Number: 555-555-5555	

Physician Information

Physician Primary Type:
Medical Doctor

National Provider Identifier (NPI):
1234567890

Drug Enforcement Administration (DEA) Number:

Taxonomy Codes:
1 Allopathic & Osteopathic Physicians(Anesthesiology)

State Licenses:
Maryland License 1234567890



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Open Payments User Guide

Step 3: Update fields as necessary. When changes are complete, select “Save Updates.”

The screenshot shows the 'Update Profile' form. At the top, there is a navigation bar with 'Home', 'Review and Dispute', 'My Profile', and 'Help'. Below the navigation bar, the user's name 'John Doe' and title 'Medical Doctor' are displayed. The form has three tabs: 'Overview', 'My Profile Details', and 'My Roles & Nominations'. The 'Update Profile' section contains instructions: 'A text with an asterisk (*) is required. You may update your physician profile by entering the updated information below. You must provide your National Provider Identifier (NPI), if you have one. You must also provide all of your state licenses. Note: Once your profile has been successfully verified, you will not be able to update your NPI in your physician profile.' Below this, there is a section for 'Nominated Authorized Representative's Access Level' with three radio button options: 'Read', 'Read Profile', and 'Dispute Records'. The 'Save Updates' button is circled in red.

Step 4: The updated information will now appear on the “My Profile Details” page.

The screenshot shows the 'My Profile Details' page. The navigation bar is the same as in Step 3. The user's name is now 'John Miller' and the title is 'Medical Doctor'. The 'My Profile Details' tab is selected. The 'Update Profile' button is now disabled. The page displays the following information:

Personal Information	
Name: John Miller	Physician Practice Name:
Business Email Address: openpayments@jvymail.com	Physician Practice Business Address: 7500 Security Blvd, Baltimore, MD 21244
Business Telephone Number: 555-555-5555	

Physician Information	Physician's Authorized Representative
Physician Primary Type: Medical Doctor	Authorized Representative: Mary Davis
National Provider Identifier (NPI): 1234567890	Business Email Address: openpayments@jvymail.com
Drug Enforcement Administration (DEA) Number: 12345678A	Business Telephone Number: 555-555-5555
Taxonomy Codes: 1 Anatomic & Osteopathic Physician (Anesthesiologist)	Job Title: Office Manager
State Licenses: Maryland License 1234567890	Business Address: 7500 Security Blvd, Baltimore, MD 21244
	Access Level: Edit Physician profile, Review Data (Read-Only), Dispute Data

Review and Dispute For Physicians and Teaching Hospitals

Chapter 7: Review and Dispute for Physicians, Teaching Hospitals, and Principal Investigators

This chapter provides information on the review, dispute, and correction process for physicians, teaching hospitals, and principal investigators in the Open Payments system.

This chapter is divided into the following sections:

- **Review, Dispute, and Correction Overview** provides information on the review and dispute process within the Open Payments system.
- **Reviewing and Affirming Records** provides information on how physicians, teaching hospitals, and principal investigators can review and affirm data submitted about them by applicable manufacturers and applicable GPOs.
- **Initiating and Withdrawing Disputes** provides information on how physicians, teaching hospitals, and principal investigators can initiate or withdraw a dispute of submitted data.

This chapter covers the review and dispute functions for physicians, teaching hospitals, and principal investigators. Review, dispute, and correction functions for applicable manufacturers and applicable GPOs are covered in Chapter Five, “Review and Dispute for Applicable Manufacturers and Applicable GPOs.”

Section 7.1: Review, Dispute, and Correction Overview

Physicians, teaching hospitals, or principal investigators may review data reported about them by applicable manufacturers and applicable GPOs in the Open Payments system. If errors are found in the reported data, a dispute may be initiated with the applicable manufacturer or applicable GPO. Physicians and teaching hospitals may dispute any part of a record in which they are identified as the covered recipient. **Principal Investigators (PIs) may only dispute their own association with a record and their own personal identifying information given in the record. They should not dispute any other information in the record, such as payment amount, nature of payment, etc.**

Open Payments User Guide

Physicians, teaching hospitals, and principal investigators should work directly with reporting entities to resolve disputes outside of the Open Payments system. **CMS will not mediate disputes between physicians, teaching hospitals, principal investigators, and reporting entities.**

All physicians, teaching hospitals, and principal investigators who want to view data reported about them must register in both EIDM and Open Payments prior to accessing the Open Payments system. See Chapter 6 for registration information.

The review and dispute process is outlined in **Figure 7.1**, below.

Figure 7.1: Review, Dispute, and Correction Process

Review Activities	Dispute Activities	Correction Activities
<ul style="list-style-type: none"> Physicians, teaching hospitals, and principal investigators may review data submitted about them before it is published. 	<ul style="list-style-type: none"> Physicians, teaching hospitals, and principal investigators dispute information reported about them or their institutions if they find inaccuracies. 	<ul style="list-style-type: none"> Applicable manufacturers and applicable GPOs work with the disputing physician, teaching hospital, or principal investigator to correct disputed data, or agree that no change to data is necessary to resolve the dispute. Applicable manufacturers and applicable GPOs re-submit and attest to corrected records, if necessary.

Email notifications are sent to alert applicable manufacturers, applicable GPOs, physicians, teaching hospitals, and principal investigators of review and dispute activities in the Open Payments system. These emails contain only the information necessary to locate the record in the Open Payments system and do not contain contact information for any of the parties involved in the dispute. You must view the record details in the system or obtain contact information if needed.

7.1a: Review, Dispute, and Correction Period

Each program year has a scheduled review, dispute, and correction period. This period begins with a 45-day period for physicians, teaching hospitals, and principal investigators to review, dispute, and work with the reporting entity to resolve the disputed record(s) submitted during the submission period. This includes records submitted for the previous program year and any records submitted late from prior program years. Immediately following the initial 45-day period is an additional 15-day correction period for reporting entities to make final corrections to records and resolve any active disputes. Records that are flagged for delay in publication by the reporting entity are eligible for review and dispute by physicians, teaching hospitals, and principal investigators.

Open Payments User Guide

Note that although there is a distinct review, dispute, and correction period, these activities can be performed throughout the year. The designated review and dispute period only affects when and how the dispute is displayed in the data publication and subsequent data refresh. Therefore, if a dispute is not resolved within the review, dispute, and correction period for a program year, all parties should continue to seek a resolution until the dispute is resolved. Once the dispute is resolved and any necessary corrections made to the record(s), the data will be updated in a subsequent publication based on when they were corrected in the Open Payments system.

Disputes initiated within the initial 45-day review, dispute, and correction period, and resolved by the end of the additional 15-day correction period, will be published and identified as non-disputed in the initial public posting of data. If the dispute is not resolved by the end of the correction period, the record will be published and identified as being under dispute.

Disputes initiated or resolved after the full 60-day review, dispute, and correction period will not be reflected in the initial publication of data. Those disputes and any related data changes will be published in the next publication of data, which may be a refresh publication of the program year data or the publication of the next program year's data. See Chapter 8, "Data Publication," for details on how dispute and resolution timing affect data publication. In the publication, the data will be associated with the program year of the data, not the date of its publication.

7.1b: Effects of Changing a Record to Resolve a Dispute

When a dispute resolution results in changes to a record, applicable manufacturers and applicable GPOs must re-submit the record with the revisions to the Open Payments system and attest to the revisions. The physician, teaching hospital, or principal investigator will be able to view the updated record once it has been re-submitted and re-attested also.

If the physician, teaching hospital, or principal investigator identified in a record is changed as part of a dispute resolution, the original physician, teaching hospital, or principal investigator will no longer see the record in his or her profile. Only the newly identified physician, teaching hospital, or principal investigator identified in the record will see it. The newly identified physician, teaching hospital, or principal investigator will see the record during the next calendar year's review and dispute period. To review the record, the newly identified physician, teaching hospital, or principal investigator would need to search through records submitted for the program year referenced in the new record.

For example, if a program year 2013 record was edited during the calendar year 2015 review and dispute period to identify a new covered recipient, the record would be available for review and dispute for the newly identified physician, teaching hospital, or principal investigator during calendar year 2016 review and dispute period, and the record would be found along with all records from the 2013 program year.

Records may be identified as under dispute in data publications, and dispute resolutions may affect what versions of data are published. For details on data publication, see Chapter 8.

7.1c: Review and Dispute Statuses

Records in the review and dispute process will have one of the following review and dispute statuses:

- **Initiated:** indicates that a physician, teaching hospital, or principal investigator has initiated a dispute against a record submitted by an applicable manufacturer or applicable GPO.
- **Acknowledged:** Indicates that an applicable manufacturer or applicable GPO has received and acknowledged a dispute initiated by a physician, teaching hospital, or principal investigator.
- **Resolved, No Change:** Indicates that the applicable manufacturer or applicable GPO and the physician, teaching hospital, or principal investigator have resolved the dispute in accordance with the guidance in the Final Rule, and no changes were made to the disputed record.
- **Withdrawn:** Indicates that a physician, teaching hospital, or principal investigator has withdrawn a dispute they initiated against a record submitted by an applicable manufacturer or applicable GPO.
- **Resolved:** Indicates that disputed data was updated and then re-submitted and re-attested to by the applicable manufacturer or applicable GPO.

Open Payments User Guide

7.1d: Exporting Disputed Data

The Open Payments system allows users to download disputed data into a separate CSV file. Records are exported into a pipe (“|”) delimited CSV file by selecting the link labeled “Download Disputes” on your “Review and Dispute” page.

The file will be compressed into a ZIP file. It will contain all data fields displayed in the table and other data elements related to the dispute. Downloaded data files cannot exceed the acceptable record limit (approximately 400,000 records). To download more than the acceptable record limit, apply filtering criteria to create smaller subsets of records and download them in multiple files.

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

Review and Dispute - ABCDE Teaching Hospital

[Back](#)

The table below displays all the records reported for the selected teaching hospital during the selected program year.

The list is organized by the reporting entities that reported payments or other transfers of value to the teaching hospital.

Only records that have been attested to by the reporting entities by the submission deadline of that calendar year will be displayed. For a complete set of review, dispute, and publication rules, please refer to the Open Payments User Guide on the “Resources” page on the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>.

Please note: There may be 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.

You may export your filtered search results into a CSV file by selecting the link labeled “Download Zip File.” Only one CSV file will be generated containing both general and research related payments. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. To view all fields for a record, select the “Record ID” hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Entity Making Payment column:

- 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 an explanation for your dispute of the record. Note: If you are listed as principal investigator (PI-Only), you may dispute only your identification as a principal investigator for the record and identifying information, such as your name, NPI (if applicable), and license details.
- Select “Withdraw Dispute” to acknowledge that the physician is no longer disputing the record. The record must be in a Review and Dispute status of “initiated” or “Acknowledged” in order to be withdrawn.

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

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

Teaching Hospital Records

Entity Making Payment: Record ID: Maximum 38 digits Dispute ID: Maximum 38 digits

Please Select

Review and Dispute Status: Payment Category: Affirmed (Yes/No):

General Payments
 Research Payments

Yes
 No

[Download Zip File](#) [Search](#) [Clear All](#)

Showing Results for: [All]

Show Entries 10
[Affirm Record](#) [Dispute Record](#) [Withdraw Dispute](#)

Select	Entity Making Payment	Record ID	Payment Category	Principal Investigators Associated?	Date of Payment	Amount(\$)	Dispute ID	Review and Dispute Status	Date Dispute Initiated	History Of Dispute	Delay in Publication of Research Payment Indicator	Affirmed (Yes/No)
✓	WXYZ Medical	667247	Research Payments	Yes	2015-09-01	\$76,767.22					No	No

⏪ < Page 1 of 1 > ⏩ showing 1 of 1 entries Page 1 [Go](#)

Section 7.2: Reviewing and Affirming Records

Physicians, teaching hospitals, and principal investigators that have registered with the Open Payments system may review all payments, other transfers of value, and physician ownership or investment interests submitted about them by an applicable manufacturer or applicable GPO. Records that have been reviewed and determined to be accurate can be affirmed by the physician, teaching hospital, or principal investigator in the Open Payments system. Affirmation is not a required action. Records that have not been affirmed will still be included in the next data publication. You may initiate disputes on records that have been previously affirmed if you determine that the record contains an error.

The process for reviewing and affirming records is illustrated in **Figure 7.2** below. Step-by-step walkthroughs of various scenarios follow.

Figure 7.2: Review and Affirmation Process



7.2a: Teaching Hospital - Reviewing and Affirming Submitted Data

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials, navigate to the Open Payments home page, and select the “Review and Dispute” tab on the menu bar.

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

Announcements

2015 Program Year General Information - Review and dispute functionality in the Open Payments system is unavailable until April 2016. CMS will announce the beginning of the review and dispute period via the Open Payments listserv.

You may register or affiliate yourself with a teaching hospital, accept or request nominations, and review your profile information. Resources to complete these actions are located on the Resources page of the Open Payments website.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

You can manage your user profile and perform the actions associated with your profile.

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: From the drop-down menus, select the teaching hospital and program year for which you wish to review data submitted by applicable manufacturers and applicable GPOs. Select “Show Records.”

Open Payments (Sunshine Act)
Teaching Hospital Switch User Type

Home | **Review and Dispute** | Manage Teaching Hospitals | My Profile | Help

Review, Affirm, Dispute | Register, Edit, Nominate Roles | Account, Roles, Nominations

Review and Dispute Overview

A field with an asterisk (*) is required.

Teaching Hospital Records

Select the teaching hospital and program year from the drop-down list below, then select "Show Records." This will display records relating to payments or other transfers of value, or ownership or investment interests for that teaching hospital and program year that are disputed. Physicians, teaching hospitals, and principal investigators may initiate disputes with reporting entities from the start of the review and dispute period until the end of the calendar year. There is an initial 45-day review and dispute period for physicians, teaching hospitals, and principal investigators to review and dispute their data, followed by a 15-day correction period for reporting entities to resolve disputes and make necessary corrections to the data prior to publication.

Note: Only records on which a dispute was initiated at least once during the 45-day review and dispute period and not resolved within the 15-day correction period will be published as disputed in the initial annual data publication for that year.

Any disputes initiated for the first time after the 45-day review and dispute period and not resolved within the 15-day correction period will be published as not disputed in the initial annual data publication for that year.

Only records for which attestation was completed by the submission deadline in that calendar year will be eligible for the review and dispute process for that calendar year.

For a complete list of review and dispute rules, refer to the Quick Reference Guide and the User Guide located under "Resources" in the CMS Open Payments website

*Choose a Teaching Hospital:
ABCDE Teaching Hospital - 7500 Security Blvd

*Program Year:
2015

Show Records

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

If the chosen teaching hospital has no records associated with it, you will receive a message at the top of the page saying “There are no payments or other transfers of value reported for this teaching hospital.”

If there are records associated with your chosen teaching hospital, proceed to Step 3.

Open Payments User Guide

Step 3: On the Review and Dispute page, you will see a list of all the records reported for the selected teaching hospital during the selected program year.

If you wish, you may filter the records by selecting the “Entity Making Payment” from the specified drop-down. You may also filter further by including the record ID, and/or dispute ID. You do not need to filter the results in order to proceed. For instructions on how to export this data, see Section 7.1d.

If you wish to view details associated with the record, select the “Record ID” hyperlink of the record you wish to view. The Record ID page also contains contact information for the entity that submitted the record.

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
-------------	----------------------------------------------------------------------	------------------------------------------------------------------------------------	------------------------------------------------------------------	-------------

Review and Dispute - ABCDE Teaching Hospital

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The table below displays all the records reported for the selected teaching hospital during the selected program year.

The list is organized by the reporting entities that reported payments or other transfers of value to the teaching hospital.

Only records that have been attested to by the reporting entities by the submission deadline of that calendar year will be displayed. For a complete set of review, dispute, and publication rules, please refer to the Open Payments User Guide on the "Resources" page on the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>.

Please note: There may be 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.

You may export your filtered search results into a CSV file by selecting the link labeled "Download." Only one CSV file will be generated containing both general and research related payments. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Entity Making Payment column:

- 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 an explanation for your dispute of the record. Note: If you are listed as principal investigator (PI-Only), you may dispute only your identification as a principal investigator for the record and identifying information, such as your name, NPI (if applicable), and license details.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record. The record must be in a Review and Dispute status of "Initiated" or "Acknowledged" in order to be withdrawn.

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

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

Teaching Hospital Records

Entity Making Payment: Please Select	Record ID: Maximum 38 digits	Dispute ID: Maximum 38 digits
Review and Dispute Status: Initiated Acknowledged Resolved No Change Withdrawn Resolved	Payment Category: <input type="checkbox"/> General Payments <input type="checkbox"/> Research Payments	Affirmed (Yes/No): <input type="checkbox"/> Yes <input type="checkbox"/> No
Download Search Clear All		

Showing Results for: [All]

Show Entries 10

[Affirm Record](#)

[Dispute Record](#)

[Withdraw Dispute](#)

Select	Entity Making Payment	Record ID	Payment Category	Principal Investigators Associated?	Date of Payment	Amount(\$)	Dispute ID	Review and Dispute Status	Date Dispute Initiated	History Of Dispute	Delay in Publication of Research Payment Indicator	Affirmed (Yes/No)
<input checked="" type="checkbox"/>	WXYZ Medical	667247	Research Payments	Yes	2015-09-01	\$76,767.22					No	No



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Open Payments User Guide

Step 4: Review the information in the submitted record, including principal investigator information. Contact information for the reporting entity will also be visible on this screen. When finished, select “Back” to return to the Review and Dispute page.

Open Payments (Sunshine Act)

Teaching Hospital Search User Type

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[Review and Dispute](#)
Display, Filter, Update

[Manage Teaching Hospitals](#)
Register, Edit, Nominate Roles

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

[Help](#)

Record ID: 667247

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Reporting Entity Contact Information

If you have any questions about this record, you may use the contact information provided below to directly contact the reporting entity.

Contact Karen Miller at 555-555-5555 or openpayments@vopmail.com

Record Details

Program Year: 2015
Reporting Entity: WXYZ Medical
Payment Category: General Payments
Consolidated Reporting: No
Last Modified Date: 2015-09-01
Submission Date: 2014-12-10
Record Status: Archived

Active Disputes

Associated Disputes and Statuses:

Dispute ID	Status
None	None

Recipient Demographic Information

Covered Recipient Type: Teaching Hospital
Teaching Hospital Name: ABCDE Teaching Hospital
Teaching Hospital Taxpayer ID Number (TIN): 123456789
Recipient Business Street Address, Line 1: 1500 Security Blvd
Recipient Business Street Address, Line 2:
Recipient City: Baltimore
Recipient State: Maryland
Recipient Zip Code:
Recipient Country: United States
Recipient Province:
Recipient Postal Code:
Recipient Email Address:

Associated Drug, Device, Biological, or Medical Supply Information

Product Indicator: Combination
National Drug Code (NDC) of Associated Covered Drug or Biological: 1-8767-002-08
Name of Associated Covered Drug or Biological: 1-Test1
Name of Associated Covered Device or Medical Supply: 1-Asprofen 2-Avira 3-Nurofen 4-Tylenol 5-Polyvisc

Transfer of Value (Payment) Information

Applicable Manufacturer or Applicable GPO Making Payment Name: WXYZ Medical
Applicable Manufacturer or Applicable GPO Making Payment Registration ID: 10000205014
Total Amount of Payment: \$16,767.22
Date of Payment: 20141103
Number of Payments Included in Total Amount: 50
Form of Payment or Transfer of Value: Stock, stock option, or any other ownership interest
Nature of Payment or Transfer of Value: Compensation for services other than consulting, including serving as faculty or as a speaker at a venue other than a continuing education program
City of Travel:
State of Travel:
Country of Travel:

General Record Information

Third Party Payment Recipient Indicator: Individual
Name of Third Party Entity Receiving Payment or Transfer of Value:
Charity Indicator: Yes
Third Party Equals Covered Recipient Indicator: No
Delay in Publication of Research Payment Indicator: Delay Not Reviewed - R&D on New Product
Confidential Information: ABC

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- [Access the Open Payments User Guide](#)
- [Need help with the website? Contact Us by email](#)
- [Review the Open Payments Privacy Policy \(PDF, 102 KB\)](#)

Open Payments User Guide

Step 5: Select the checkboxes next to the record(s) you wish to affirm. You may affirm records with no dispute status, or records that have a review and dispute status of “Resolved, No Change,” “Withdrawn,” or “Resolved.”

After you have selected the record(s), select “Affirm Record.”

Open Payments (Sunshine Act)

Teaching Hospital [Switch User Type](#)

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Review and Dispute - ABCDE Teaching Hospital

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The table below displays all the records reported for the selected teaching hospital during the selected program year.

The list is organized by the reporting entities that reported payments or other transfers of value to the teaching hospital.

Only records that have been attested to by the reporting entities by the submission deadline of that calendar year will be displayed. For a complete set of review, dispute, and publication rules, please refer to the Open Payments User Guide on the “Resources” page on the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>.

Please note: There may be 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.

You may export your filtered search results into a CSV file by selecting the link labeled “Download Zip File.” Only one CSV file will be generated containing all three payment categories. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. To view all fields for a record, select the “Record ID” hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Entity Making Payment column:

- 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 an explanation for your dispute of the record. Note: If you are listed as principal investigator (PI-Only), you may dispute only your identification as a principal investigator for the record and identifying information, such as your name, NPI (if applicable), and license details.
- Select “Withdraw Dispute” to acknowledge that the physician is no longer disputing the record. The record must be in a Review and Dispute status of “Initiated” or “Acknowledged” in order to be withdrawn.

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

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

Teaching Hospital Records

Entity Making Payment:

Please Select

Record ID:
Maximum 38 digits

Dispute ID:
Maximum 38 digits

Review and Dispute Status:

Initiated
 Acknowledged
 Resolved No Change
 Withdrawn
 Resolved

Payment Category:

 General Payments
 Research Payments

Affirmed (Yes/No):

 Yes
 No

[Download Zip File](#) [Search](#) [Clear All](#)

Showing Results for: [All]

Show Entries 10

Affirm Record
Dispute Record
Withdraw Dispute

Select	Entity Making Payment	Record ID	Payment Category	Principal Investigators Associated?	Date of Payment	Amount(\$)	Dispute ID	Review and Dispute Status	Date Dispute Initiated	History Of Dispute	Delay in Publication of Research Payment Indicator	Affirmed (Yes/No)
<input checked="" type="checkbox"/>	WXYZ Medical	667247	Research Payments	Yes	2015-09-01	\$76,767.22					No	No

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Open Payments User Guide

Step 6: Review the information on the Affirm Records page. If the information is correct, select “Affirm Records.” If the information is not correct, select “Back” and either change which record you are affirming or initiate a dispute on a record.

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**

Affirm Records

ABCDE Teaching Hospital - 2015

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
667247	WXYZ Medical	2015-09-01	\$76,767.22	Attested	

Cancel **Affirm Records**

Open Payments User Guide

The following message will be displayed on the page confirming the successful affirmation of the submitted record(s). Also, the record's "Affirmed Yes/No" indicator, visible in the "View Records" table, will be set to "Yes."

Open Payments (Sunshine Act)

Teaching Hospital Switch User Type

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Manage Teaching Hospitals
Register, Edit, Nominate Roles
My Profile
Account, Roles, Nominations
Help

Review and Dispute - ABCDE Teaching Hospital

You have successfully affirmed the following record(s):

Record Id
667247

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The table below displays all the records reported for the selected teaching hospital during the selected program year.

The list is organized by the reporting entities that reported payments or other transfers of value to the teaching hospital.

Only records that have been attested to by the reporting entities by the submission deadline of that calendar year will be displayed. For a complete set of review, dispute, and publication rules, please refer to the Open Payments User Guide on the "Resources" page on the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>.

Please note: There may be 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.

You may export your filtered search results into a CSV file by selecting the link labeled "Download Zip File." Only one CSV file will be generated containing all three payment categories. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Entity Making Payment column:

- 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 an explanation for your dispute of the record. Note: If you are listed as principal investigator (PI-Only), you may dispute only your identification as a principal investigator for the record and identifying information, such as your name, NPI (if applicable), and license details.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record. The record must be in a Review and Dispute status of "Initiated" or "Acknowledged" in order to be withdrawn.

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

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

Teaching Hospital Records

Entity Making Payment: **Record ID:** **Dispute ID:**

Review and Dispute Status:

- Initiated
- Acknowledged
- Resolved No Change
- Withdrawn
- Resolved

Payment Category:

- General Payments
- Research Payments

Affirmed (Yes/No):

- Yes
- No

[Download Zip File](#) [Search](#) [Clear All](#)

Showing Results for: [All]

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

Select	Entity Making Payment	Record ID	Payment Category	Principal Investigators Associated?	Date of Payment	Amount(\$)	Dispute ID	Review and Dispute Status	Date Dispute Initiated	History Of Dispute	Delay in Publication of Research Payment Indicator	Affirmed (Yes/No)
<input type="checkbox"/>	WXYZ Medical	667247	Research Payments	Yes	2015-09-01	\$76,767.22					No	Yes

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Open Payments User Guide

7.2b: Physician and Principal Investigator – Reviewing and Affirming Submitted Data

Step 1: Access the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov/> and select the “Review and Dispute” tab on the menu bar.

Open Payments (Sunshine Act)
Physician Switch User Type

Home | **Review and Dispute** (Review, Affirm, Dispute) | Manage Physicians (Register, Edit, Nominate Roles) | My Profile (Account, Roles, Nominations) | Help

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - Review and dispute functionality in the Open Payments system is unavailable until April 2016. CMS will announce the beginning of the review and dispute period via the Open Payments listserv.

You may register or affiliate yourself with a teaching hospital, accept or request nominations, and review your profile information. Resources to complete these actions are located on the Resources page of the Open Payments website.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

You can manage your user profile and perform the actions associated with your profile. Note: In order to be able to review all records submitted for you, you must have entered your NPI, if available, and all state licenses under your profile details in Open Payments system.

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: From the drop-down menus, select the physician or principal investigator and program year for which you wish to review data submitted by applicable manufacturers and applicable GPOs. Select “Show Records.”

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 physician (including principal investigators) and program year from the drop-down list below, then select "Show Records." This will display records relating to payments or other transfers of value, or ownership or investment interests for the selected physician or principal investigator and program year that are disputed.

Physicians, teaching hospitals, and principal investigators may initiate disputes with reporting entities from the start of the review and dispute period until the end of the calendar year. There is an initial 45-day review and dispute period for physicians, teaching hospitals, and principal investigators to review and dispute their data, followed by a 15-day correction period for reporting entities to resolve disputes and make necessary corrections to the data prior to publication.

Note: Only records on which a dispute was initiated at least once during the 45-day review and dispute period and not resolved within the 15-day correction period will be published as disputed in the initial data publication for that year.

Any disputes initiated for the first time after the 45-day review and dispute period and not resolved within the 15-day correction period will be published as not disputed in the initial data publication for that year.

Only records for which attestation was completed by the submission deadline in that calendar year will be eligible for the review and dispute process for that calendar year.

For a complete list of review and dispute rules, refer to the [User Guide](#) located under "Resources" in [CMS Open Payments](#) website.

*Choose a Physician:
Mary Davis

*Program Year:
2015

Show Records

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

If the chosen physician or principal investigator has no records associated with it, you will receive a message at the top of the page saying “There are no payments or other transfers of value or ownership or investment interests reported for you or your family members.” If there are records associated with your chosen physician, proceed to Step 3.

Open Payments User Guide

Step 3: On the Review and Dispute page, you will see a list of all submitted records for the selected physician. You may filter the records by selecting “Entity Making Payment” from the appropriate drop-down menu. You may further filter information by including the Record ID, and/or Dispute ID.

You may also filter records by “Recipient” or “Principal Investigator.” When a user selects the “Recipient” checkbox, the system will only display records on which the physician is reported as a covered recipient. When a user selects the “Principal Investigator” checkbox, the system will only display records on which the physician is reported as a principal investigator. Additionally, you can determine if the physician is a principal investigator on a record by looking at the column labeled “Physician Listed as PI Only” field. For instructions on how to export this data, see Section 7.1d.

Note: Principal Investigators (PIs) may only dispute their own association with a record and their own personal identifying information given in the record. They cannot dispute any other information in the record, such as payment amount, nature of payment, etc.

If you wish to view details associated with the record, select the “Record ID” hyperlink of the record you wish to view. On the Record ID page is contact information for the entity that submitted the record.

Open Payments (Sunshine Act)

Physician Switch User Type

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The table below displays all records reported for the selected physician or principal investigator during the selected program year.

The list is organized by reporting entity, including reporting entities that reported 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 the reporting entities by the submission deadline of that calendar year will be displayed. For a complete set of review, dispute, and publication rules, please refer to the Open Payments User Guide on the "Resources" page on the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>.

Please note: There may be 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.

You may export your filtered search results into a CSV file by selecting the link labeled "Download". Only one CSV file will be generated containing all three payment categories. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Entity Making Payment column:

- 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 an explanation for your dispute of the record. Note: If you are listed as principal investigator (PI-Only) you may dispute only your identification as a principal investigator for the record and identifying information, such as your name, NPI (if applicable), and license details.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record. The record must be in a Review and Dispute status of "Initiated" or "Acknowledged" in order to be withdrawn.

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:
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

Reported As:
 Recipient
 Principal Investigator

[Download](#)
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[Clear All](#)

Showing Results for: [All]

Show Entries 10

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

Select	Entity Making Payment	Record ID	Payment Category	Principal Investigators Associated?	Physician Listed as PI only?	Date of Payment	Amount(\$)	Dispute ID	Review and Dispute Status	Date Dispute Initiated	History Of Dispute	Delay in Publication of Research Payment Indicator	Affirmed (Yes/No)
<input checked="" type="checkbox"/>	WXYZ Medical	664745	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No
<input type="checkbox"/>	WXYZ Medical	664715	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No
<input type="checkbox"/>	WXYZ Medical	664725	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No
<input type="checkbox"/>	WXYZ Medical	664735	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No

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Open Payments User Guide

Step 4: Review the information in the submitted record, including principal investigator information. Contact information for the reporting entity will also be visible on this screen. When finished, select “Back” to return to the Review and Dispute page.

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Physician Search User Type

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Record ID: 664745

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Reporting Entity Contact Information

If you have any questions about this record, you may use the contact information provided below to directly contact the reporting entity.

Contact Karen Miller at 555-555-5555 or openpayments@vppmail.com

Record Details

Program Year: 2015
 Reporting Entity: WXYZ Medical
 Payment Category: General Payments
 Consolidated Reporting: No
 Last Modified Date: 2015-12-21
 Submission Date: 2015-11-19
 Record Status: Attested

Active Disputes

Associated Disputes and Statuses:

Dispute ID	Status
None	None

Recipient Demographic Information

Covered Recipient Type: Physician
 Physician First Name: Mary
 Physician Middle Name:
 Physician Last Name: Davis
 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: 1234567890
 Physician Taxonomy Code: 202C0000X
 Physician License State: Maryland
 Physician License Number: 1234567890
 Physician License State:
 Physician License Number:
 Physician License State:
 Physician License Number:
 Physician License State:
 Physician License Number:
 Physician License State:

Associated Drug, Device, Biological, or Medical Supply Information

Product Indicator: Covered
 National Drug Code (NDC) of Associated Covered Drug or Biological: 1, 3696-2722-02, 36967-373-03, 3, 36967-2722-4, 36967-2727-5, 3696-2727-72
 Name of Associated Covered Drug or Biological: 1. Advil, 2. Tylenol, 3. Bayer, 4. Vicodin, 5. Vicks
 Name of Associated Covered Device or Medical Supply: 1. Neurtach Vital Device, 2. Sham Device, 3. Manual air advancement device, 4. tablet, 5. liquid

Transfer of Value (Payment) Information

Applicable Manufacturer or Applicable GPO Making Payment Name: WXYZ Medical
 Applicable Manufacturer or Applicable GPO Making Payment Registration ID: X000032011
 Total Amount of Payment: \$26,000.66
 Date of Payment: 20150104
 Number of Payments Included in Total Amount: 5
 Form of Payment or Transfer of Value: Cash or cash equivalent
 Nature of Payment or Transfer of Value: Travel and Lodging
 City of Travel:
 State of Travel:
 Country of Travel:

General Record Information

Physician Ownership Indicator: No
 Third Party Payment Recipient Indicator: Entity
 Name of Third Party Entity Receiving Payment or Transfer of Value: ABCDE Teaching Hospital
 Charity Indicator: Yes
 Third Party Equals Covered Recipient Indicator: Yes
 Delay in Publication of Research Payment Indicator: Delay, Not Renewed, C.I. on New Product
 Contextual Information: Text 1

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

 [Review the Open Payments Privacy Policy \(PDF, 102 KB\)](#)



Open Payments User Guide

Step 5: Select the checkboxes next to the record(s) you wish to affirm. You may affirm records with no dispute status, or records that have a review and dispute status of “Resolved, No Change,” “Withdrawn,” or “Resolved”.

After you have selected the record(s), select “Affirm Record.”

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The table below displays all records reported for the selected physician or principal investigator during the selected program year.

The list is organized by reporting entity, including reporting entities that reported 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 the reporting entities by the submission deadline of that calendar year will be displayed. For a complete set of review, dispute, and publication rules, please refer to the Open Payments User Guide on the “Resources” page on the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>.

Please note: There may be 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.

You may export your filtered search results into a CSV file by selecting the link labeled “Download Zip File.” Only one CSV file will be generated containing all three payment categories. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. To view all fields for a record, select the “Record ID” hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Entity Making Payment column:

- 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 an explanation for your dispute of the record. Note: If you are listed as principal investigator (PI-Only) you may dispute only your identification as a principal investigator for the record and identifying information, such as your name, NPI (if applicable), and license details.
- Select “Withdraw Dispute” to acknowledge that the physician is no longer disputing the record. The record must be in a Review and Dispute status of “Initiated” or “Acknowledged” in order to be withdrawn.

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:

Physico Select

Record ID:

Maximum 38 digits

Dispute ID:

Maximum 38 digits

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

Reported As:

Recipient
 Principal Investigator

Download Zip File Search Clear All

Showing Results for: [All]

Show Entries 10

Affirm Record
Dispute Record
Withdraw Dispute

Select All	Entity Making Payment	Record ID	Payment Category	Principal Investigators Associated?	Physician Listed as PI only?	Date of Payment	Amount(s)	Dispute ID	Review and Dispute Status	Date Dispute Initiated	History Of Dispute	Delay in Publication of Research Payment Indicator	Affirmed (Yes/No)
<input checked="" type="checkbox"/>	WXYZ Medical	664745	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No
<input checked="" type="checkbox"/>	WXYZ Medical	664715	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No
<input type="checkbox"/>	WXYZ Medical	664725	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No
<input type="checkbox"/>	WXYZ Medical	664735	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No

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Open Payments User Guide

Step 6: Review the information on the Affirm Records page. If the information is correct, select “Affirm Records.” If the information is not correct, select “Back” and either change which record you are affirming or initiate a dispute on a record.

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Affirm Records

Mary Davis - 2015

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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
664745	WXYZ Medical	2015-01-04	\$26,000.66	Attested	

[Cancel](#) [Affirm Records](#)

Open Payments User Guide

The following message will be displayed on the page below, confirming the successful affirmation of the submitted record. Also, the record's "Affirmed Yes/No" indicator, visible in the "View Records" table, will be set to "Yes."

Open Payments (Sunshine Act)

Physician Switch User Type

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Review, Affirm, Dispute
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Review and Dispute - Mary Davis - 2015

You have successfully affirmed the following record(s):

Record id
654745

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The table below displays all records reported for the selected physician or principal investigator during the selected program year

The list is organized by reporting entity, including reporting entities that reported 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 the reporting entities by the submission deadline of that calendar year will be displayed. For a complete set of review, dispute, and publication rules, please refer to the Open Payments User Guide on the "Resources" page on the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>

Please note: There may be 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.

You may export your filtered search results into a CSV file by selecting the link labeled "Download Zip File." Only one CSV file will be generated containing all three payment categories. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Entity Making Payment column:

- 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 an explanation for your dispute of the record. Note: If you are listed as principal investigator (PI-Only) you may dispute only your identification as a principal investigator for the record and identifying information, such as your name, NPI (if applicable), and license details.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record. The record must be in a Review and Dispute status of "Initiated" or "Acknowledged" in order to be withdrawn.

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: Maximum 38 digits

Dispute ID: Maximum 38 digits

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

Reported As: Recipient Principal Investigator

[Download Zip File](#) [Search](#) [Clear All](#)

Showing Results for: [All]

Show Entries: 10 [Affirm Record](#) [Dispute Record](#) [Withdraw Dispute](#)

Select	Entity Making Payment	Record ID	Payment Category	Principal Investigator Associated?	Physician Listed as PI only?	Date of Payment	Amount(\$)	Dispute ID	Review and Dispute Status	Date Dispute Initiated	History Of Dispute	Delay in Publication of Research Payment Indicator	Affirmed (Yes/No)
<input type="checkbox"/>	WXYZ Medical	654745	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	Yes
<input type="checkbox"/>	WXYZ Medical	654725	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No
<input type="checkbox"/>	WXYZ Medical	654715	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No
<input type="checkbox"/>	WXYZ Medical	654735	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No

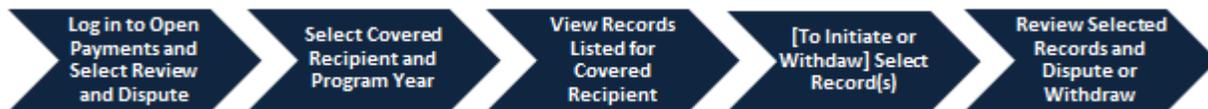
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Section 7.3: Initiating and Withdrawing Disputes

Physicians, teaching hospitals, and principal investigators can dispute data submitted by applicable manufacturers and applicable GPOs regarding payments or other transfers of value if the data contains inaccuracies.

When a physician, teaching hospital, or principal investigator initiates or withdraws a dispute, the applicable manufacturer or applicable GPO will receive an email notification regarding the dispute status with relevant information about the action taken. The process for initiating and withdrawing disputes is illustrated in **Figure 7.3** below. Step-by-step walkthroughs of various dispute scenarios are provided in this section.

Figure 7.3: Initiating and Withdrawing Disputes Process



When an applicable manufacturer or applicable GPO revises a record to address a dispute, the record will no longer be visible to the physician, teaching hospital, or principal investigators identified in that record until the revision is complete and the record is re-attested by the applicable manufacturer or applicable GPO.

Therefore, if you can no longer find a record that you have disputed, first check to see if the applicable manufacturer or applicable GPO has acknowledged the dispute. If the dispute has been acknowledged, you will have received an acknowledgement email from the Open Payments system for that dispute. This email confirms that the record exists and the dispute received. If you cannot find a record that you have disputed and you do not have an acknowledgement email for that record, contact the Open Payments Help Desk at openpayments@cms.hhs.gov.

7.3a: Teaching Hospital – Initiating a Dispute

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page, and select the “Review and Dispute” tab on the menu bar.

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

Announcements

2015 Program Year General Information - Review and dispute functionality in the Open Payments system is unavailable until April 2016. CMS will announce the beginning of the review and dispute period via the Open Payments listserv.

You may register or affiliate yourself with a teaching hospital, accept or request nominations, and review your profile information. Resources to complete these actions are located on the Resources page of the Open Payments website.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

You can manage your user profile and perform the actions associated with your profile.

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: From the drop-down menus, select the teaching hospital and program year for which you wish to review data submitted by applicable manufacturers and applicable GPOs. Select “Show Records.”

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

Review and Dispute Overview

A field with an asterisk (*) is required.

Teaching Hospital Records

Select the teaching hospital and program year from the drop-down list below, then select "Show Records." This will display records relating to payments or other transfers of value, or ownership or investment interests for that teaching hospital and program year that are disputed. Physicians, teaching hospitals, and principal investigators may initiate disputes with reporting entities from the start of the review and dispute period until the end of the calendar year. There is an initial 45-day review and dispute period for physicians, teaching hospitals, and principal investigators to review and dispute their data, followed by a 15-day correction period for reporting entities to resolve disputes and make necessary corrections to the data prior to publication.

Note: Only records on which a dispute was initiated at least once during the 45-day review and dispute period and not resolved within the 15-day correction period will be published as disputed in the initial annual data publication for that year.

Any disputes initiated for the first time after the 45-day review and dispute period and not resolved within the 15-day correction period will be published as not disputed in the initial annual data publication for that year.

Only records for which attestation was completed by the submission deadline in that calendar year will be eligible for the review and dispute process for that calendar year.

For a complete list of review and dispute rules, refer to the Quick Reference Guide and the User Guide located under "Resources" in the CMS Open Payments website

***Choose a Teaching Hospital:**
ABCDE Teaching Hospital - 7500 Security Blvd

***Program Year:**
2015

Show Records

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

If the chosen teaching hospital has no records associated with it, you will receive a message at the top of the page saying “There are no payments or other transfers of value reported for this teaching hospital.” If there are records associated with your chosen teaching hospital, proceed to Step 3.

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Step 3: On the Review and Dispute page, you will see a list of all submitted records for the selected teaching hospital. If you wish, you may filter the records by selecting the “Entity Making Payment” from the specified drop-down. You may also filter further by including the “Record ID,” and/or “Dispute ID.” You do not need to filter the results in order to proceed. For instructions on how to export this data, see Section 7.1d.

Scroll to the right and select “View” under the column title “View Record” if you wish to view the record details. On the individual record’s detail page, you will see the specifics of the record and the reporting entity’s designated review and dispute point of contact.

Select the checkboxes next to the record(s) you wish to dispute, then select “Dispute Record.”

Open Payments (Sunshine Act)
Teaching Hospital Switch User Type

Home | **Review and Dispute** | Manage Teaching Hospitals | My Profile | Help

Review and Dispute - ABCDE Teaching Hospital - 2015

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The table below displays all the records reported for the selected teaching hospital during the selected program year. The list is organized by the reporting entities that reported payments or other transfers of value to the teaching hospital. Only records that have been attested to by the reporting entities by the submission deadline of that calendar year will be displayed. For a complete set of review, dispute, and publication rules, please refer to the Open Payments User Guide on the “Resources” page on the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>.

Please note: There may be 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.

You may export your filtered search results into a CSV file by selecting the link labeled “Download Zip File.” Only one CSV file will be generated containing both general and research related payments. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. To view all fields for a record, select the “Record ID” hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Entity Making Payment column:

- 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 an explanation for your dispute of the record. Note: If you are listed as principal investigator (PI-Only), you may dispute only your identification as a principal investigator for the record and identifying information, such as your name, NPI (if applicable), and license details.
- Select “Withdraw Dispute” to acknowledge that the physician is no longer disputing the record. The record must be in a Review and Dispute status of “Initiated” or “Acknowledged” in order to be withdrawn.

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

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

Teaching Hospital Records

Entity Making Payment: [Please Select] | Record ID: [Maximum 38 digits] | Dispute ID: [Maximum 38 digits]

Review and Dispute Status: [Initiated, Acknowledged, Resolved No Change, Withdrawn, Resolved] | Payment Category: [General Payments, Research Payments] | Affirmed (Yes/No): [Yes, No]

Download Zip File | Search | Clear All

Showing Results for: [All]

Show Entries: 10 | Affirm Record | **Dispute Record** | Withdraw Dispute

Select	Entity Making Payment	Record ID	Payment Category	Principal Investigator Association	Date of Payment	Amount (\$)	Dispute ID	Review and Dispute Status	Data Dispute Initiated	History Of Dispute	Delay in Publication of Research Payment Indicator	Affirmed (Yes/No)
<input type="checkbox"/>	WXYZ Medical	26724	General Payments	N/A	2015-04-14	\$1,250.00		Resolved		View	No	No
<input type="checkbox"/>	WXYZ Medical	23256	General Payments	N/A	2015-02-20	\$1,200.00		Resolved		View	No	Yes
<input checked="" type="checkbox"/>	WXYZ Medical	23992	General Payments	N/A	2015-07-18	\$2,500.00					No	No

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Open Payments User Guide

Step 4: Review the information on the Dispute Records page. You must enter a reason the dispute has been initiated in the “Dispute Details” text box before continuing. The text box can contain up to 4,000 characters, including spaces, and allows all special characters on a standard U.S. keyboard (not including ALT+NUMPAD ASCII Key characters). **It is recommended that you add review and dispute contact information, such as an email address and/or phone number, within the text box,** as this will assist the reporting entity in resolving the dispute in a timely manner.

When you select “Send Dispute,” the system will send an email to the reporting entity or entities notifying them that a dispute has been initiated. This email will include the contents of the “Dispute Details” text box. If a dispute is initiated for multiple records across multiple reporting entities simultaneously, all reporting entities referenced in the dispute will receive the same email notification including the “Dispute Details” text. **If the reasons for dispute vary for each disputed record, perform the actions above separately for each dispute to ensure the correct reasons are provided to each reporting entity.**

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Dispute Records

A field with an asterisk (*) is required.

ABCDE Teaching Hospital - 2015

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In the "Dispute Details" text box below, explain the reason for disputing the record. You may also use this text box to provide contact information for reporting entities to directly contact you.

If you are listed as a principal investigator, you may only dispute your association with the payment or any inaccurate identifying information.

If multiple disputes are initiated at the same time across multiple reporting entities, the text entered in the "Dispute Details" text box will be sent to all of those reporting entities. If you have different reasons for disputing each record, you should dispute each one individually.

When finished, select "Send Dispute" the status of the dispute will then be updated to "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
23592	WXYZ Medical	2015-04-14	\$2,500.00	Attested	

***Dispute Details:** 4,000 characters maximum

Enter dispute details.

Open Payments User Guide

The following “Dispute Confirmed” message will be displayed on the page. An email notification will be sent to the reporting entity. Select “Continue” to return back to the “Review and Dispute” page.

Open Payments (Sunshine Act)
Teaching Hospital Switch User Type

Disputes Confirmed

ABCDE Teaching Hospital - 2015

Continue
You have successfully initiated the following dispute(s).
An email has been sent to notify the reporting entity.
Date Dispute(s) Initiated: 12/15/2015 12:53 PM

Record ID	Dispute ID Assigned	Entity Making Payment
23592	4321	WXYZ Medical

Dispute Details:
Enter dispute details.

Continue

You will receive an email notification from the Open Payments system when the status of your disputed record changes. If, as part of the resolution to the dispute, the teaching hospital identified in the record is changed and your hospital is no longer associated with that record, you will no longer see the record in your profile. In such an event, you will receive an email notification that your dispute has been resolved, though you will no longer be able to see the record. If the record is deleted, you will no longer see it in your profile.

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Review and Dispute - ABCDE Teaching Hospital - 2015

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The table below displays all the records reported for the selected teaching hospital during the selected program year.

The list is organized by the reporting entities that reported payments or other transfers of value to the teaching hospital.

Only records that have been attested to by the reporting entities by the submission deadline of that calendar year will be displayed. For a complete set of review, dispute, and publication rules, please refer to the Open Payments User Guide on the "Resources" page on the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>.

Please note: There may be 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.

You may export your filtered search results into a CSV file by selecting the link labeled "Download Zip File." Only one CSV file will be generated containing both general and research related payments. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Entity Making Payment column:

- 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 an explanation for your dispute of the record. Note: If you are listed as principal investigator (PI-Only), you may dispute only your identification as a principal investigator for the record and identifying information, such as your name, NPI (if applicable), and license details.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record. The record must be in a Review and Dispute status of "Initiated" or "Acknowledged" in order to be withdrawn.

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

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

Teaching Hospital Records

Entity Making Payment: |
 Record ID: |
 Dispute ID:

Review and Dispute Status: |
 Payment Category: General Payments |
 Affirmed (Yes/No): Yes

Resolved No Change |
 Research Payments |
 No

Withdrawn |
 Resolved

[Download Zip File](#) |
 [Search](#) |
 [Clear All](#)

Showing Results for: [All]

Show Entries 10

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

Select	Entity Making Payment	Record ID	Payment Category	Principal Investigators Associated?	Date of Payment	Amount(\$)	Dispute ID	Review and Dispute Status	Date Dispute Initiated	History Of Dispute	Delay in Publication of Research Payment Indicator	Affirmed (Yes/No)
<input type="checkbox"/>	WXYZ Medical	23592	General Payments	N/A	2015-04-14	\$2,500.00	4321	Initiated	2015-12-15	View	No	No
<input type="checkbox"/>	WXYZ Medical	26724	General Payments	N/A	2015-02-20	\$1,250.00		Resolved		View	No	No
<input type="checkbox"/>	WXYZ Medical	23258	General Payments	N/A	2015-07-18	\$1,200.00		Resolved		View	No	Yes

[<](#) < Page 1 of 1 > > |
 showing 1 of 1 entries Page 1 [Go](#)

7.3b: Teaching Hospital – Withdrawing a Dispute

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page, and select the “Review and Dispute” tab on the menu bar.

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

Announcements

2015 Program Year General Information - Review and dispute functionality in the Open Payments system is unavailable until April 2016. CMS will announce the beginning of the review and dispute period via the Open Payments listserv.

You may register or affiliate yourself with a teaching hospital, accept or request nominations, and review your profile information. Resources to complete these actions are located on the Resources page of the Open Payments website.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

You can manage your user profile and perform the actions associated with your profile.

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]



Open Payments User Guide

Step 2: From the drop-down menus, select the teaching hospital and program year for which you wish to review data submitted by applicable manufacturers and applicable GPOs. Select “Show Records.”

Open Payments (Sunshine Act)
Teaching Hospital Switch User Type

Home | **Review and Dispute** | Manage Teaching Hospitals | My Profile | Help
Review, Affirm, Dispute | Register, Edit, Nominate Roles | Account, Roles, Nominations

Review and Dispute Overview

A field with an asterisk (*) is required.

Teaching Hospital Records

Select the teaching hospital and program year from the drop-down list below, then select "Show Records." This will display records relating to payments or other transfers of value, or ownership or investment interests for that teaching hospital and program year that are disputed. Physicians, teaching hospitals, and principal investigators may initiate disputes with reporting entities from the start of the review and dispute period until the end of the calendar year. There is an initial 45-day review and dispute period for physicians, teaching hospitals, and principal investigators to review and dispute their data, followed by a 15-day correction period for reporting entities to resolve disputes and make necessary corrections to the data prior to publication.

Note: Only records on which a dispute was initiated at least once during the 45-day review and dispute period and not resolved within the 15-day correction period will be published as disputed in the initial annual data publication for that year.

Any disputes initiated for the first time after the 45-day review and dispute period and not resolved within the 15-day correction period will be published as not disputed in the initial annual data publication for that year.

Only records for which attestation was completed by the submission deadline in that calendar year will be eligible for the review and dispute process for that calendar year.

For a complete list of review and dispute rules, refer to the Quick Reference Guide and the User Guide located under "Resources" in the CMS Open Payments website

***Choose a Teaching Hospital:**
ABCDE Teaching Hospital - 7500 Security Blvd

***Program Year:**
2015

Show Records

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

If the chosen teaching hospital has no records associated with it, you will receive a message at the top of the page saying “There are no payments or other transfers of value reported for this teaching hospital.” If there are records associated with your chosen teaching hospital, proceed to Step 3.

Open Payments User Guide

Step 3: On the Review and Dispute page, you will see a list of all submitted records for the chosen teaching hospital. If you wish, you may filter the records by selecting the “Entity Making Payment” from the specified drop-down. You may also filter further by including the Record ID, and/or Dispute ID. You do not need to filter the results in order to proceed. For instructions on how to export this data, see Section 7.1d.

Scroll to the right and select “View” under the column title “View Record” if you wish to view the record details. On the individual record’s detail page, you will see the specifics of the record and the reporting entity’s designated review and dispute point of contact.

Select the checkboxes next to the disputed record(s) you wish to withdraw. You may only withdraw disputes on records with a review and dispute status of “Initiated” or “Acknowledged.” After you have selected the record(s), select “Withdraw Dispute.”

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

Review and Dispute - ABCDE Teaching Hospital - 2015

[Back](#)

The table below displays all the records reported for the selected teaching hospital during the selected program year. The list is organized by the reporting entities that reported payments or other transfers of value to the teaching hospital. Only records that have been attested to by the reporting entities by the submission deadline of that calendar year will be displayed. For a complete set of review, dispute, and publication rules, please refer to the Open Payments User Guide on the “Resources” page on the Open Payments website at <http://icms.gov/OpenPayments/About/Resources.html>.

Please note: There may be 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.

You may export your filtered search results into a CSV file by selecting the link labeled “Download Zip File.” Only one CSV file will be generated containing both general and research related payments. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. To view all fields for a record, select the “Record ID” hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Entity Making Payment column:

- 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 an explanation for your dispute of the record. Note: If you are listed as principal investigator (PI Only), you may dispute only your identification as a principal investigator for the record and identifying information, such as your name, NPI (if applicable), and license details.
- Select “Withdraw Dispute” to acknowledge that the physician is no longer disputing the record. The record must be in a Review and Dispute status of “Initiated” or “Acknowledged” in order to be withdrawn.

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

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

Teaching Hospital Records

Entity Making Payment: Record ID: Dispute ID:
Please Select Maximum 38 digits Maximum 38 digits

Review and Dispute Status: Initiated Acknowledged Resolved No Change Withdrawn Resolved

Payment Category: General Payments Research Payments

Affirmed (Yes/No): Yes No

[Download Zip File](#) [Search](#) [Clear All](#)

Showing Results for: [All]

Show Entries 10

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

Select	Entity Making Payment	Record ID	Payment Category	Principal Investigator Associated TO	Date of Payment	Amount(s)	Dispute ID	Review and Dispute Status	Date Dispute Initiated	History Of Dispute	Delay in Publication of Research Payment Indicator	Affirmed (Yes/No)
<input checked="" type="checkbox"/>	WXYZ Medical	23692	General Payments	N/A	2015-04-14	\$2,500.00	4321	Initiated	2015-12-15	View	No	No
<input type="checkbox"/>	WXYZ Medical	26724	General Payments	N/A	2015-02-20	\$1,250.00		Resolved		View	No	No
<input type="checkbox"/>	WXYZ Medical	22268	General Payments	N/A	2015-07-13	\$1,200.00		Resolved		View	No	Yes

Page 1 of 1 | Showing 1 of 1 entries | Page 1 | Go

Open Payments User Guide

Step 4: Review the information on the Withdraw Disputes page. If the information is correct, select “Withdraw Disputes.” If the information is not correct, select “Back” and either change which record you are withdrawing or perform another action.

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

Withdraw Disputes

ABCDE Teaching Hospital - 2015

[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
4321	23592	2015-04-14	\$2,500.00	WXYZ Medical	Initiated	Attested	2015-12-15

[Cancel](#) [Withdraw Disputes](#)

Open Payments User Guide

The following message will be displayed on the page. An email notification will be sent to the reporting entity.

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

Review and Dispute - ABCDE Teaching Hospital - 2015

You have successfully withdrawn the following dispute(s):

Record Id	Dispute Id
23592	4321

An email has been sent to notify the reporting entity.

[Back](#)

The table below displays all the records reported for the selected teaching hospital during the selected program year. The list is organized by the reporting entities that reported payments or other transfers of value to the teaching hospital. Only records that have been attested to by the reporting entities by the submission deadline of that calendar year will be displayed. For a complete set of review, dispute, and publication rules, please refer to the Open Payments User Guide on the "Resources" page on the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>.

Please note: There may be 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.

You may export your filtered search results into a CSV file by selecting the link labeled "Download Zip File." Only one CSV file will be generated containing both general and research related payments. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Entity Making Payment column:

- 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 an explanation for your dispute of the record. Note: If you are listed as principal investigator (PI Only), you may dispute only your identification as a principal investigator for the record and identifying information, such as your name, NPI (if applicable), and license details.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record. The record must be in a Review and Dispute status of "Initiated" or "Acknowledged" in order to be withdrawn.

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

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

Teaching Hospital Records

Entity Making Payment: Record ID: Maximum 38 digits
Dispute ID: Maximum 38 digits

Please Select ▼

Review and Dispute Status:

- Initiated
- Acknowledged
- Resolved No Change
- Withdrawn
- Resolved

Payment Category:

- General Payments
- Research Payments

Affirmed (Yes/No):

- Yes
- No

[Download Zip File](#) [Search](#) [Clear All](#)

Showing Results for: [All]

Show Entries 10
[Affirm Record](#) [Dispute Record](#) [Withdraw Dispute](#)

Select	Entity Making Payment	Record ID	Payment Category	Principal Investigator Associated?	Date of Payment	Amount(\$)	Dispute ID	Review and Dispute Status	Date Dispute Initiated	History Of Dispute	Delay in Publication of Research Payment Indicator	Affirmed (Yes/No)
<input type="checkbox"/>	WXYZ Medical	23592	General Payments	N/A	2015-04-14	\$2,500.00	4321	Withdrawn	2015-12-15	View	No	No
<input type="checkbox"/>	WXYZ Medical	28724	General Payments	N/A	2015-02-20	\$1,250.00		Resolved		View	No	No
<input type="checkbox"/>	WXYZ Medical	23258	General Payments	N/A	2015-07-18	\$1,200.00		Resolved		View	No	Yes

Page 1 of 1 showing 1 of 1 entries Page 1 [Go](#)

Open Payments User Guide

7.3c: Physician and Principal Investigator - Initiating a Dispute

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page, and select the “Review and Dispute” tab on the menu bar.

Open Payments (Sunshine Act)
Physician Switch User Type

Home **Review and Dispute** Review, Affirm, Dispute Manage Physicians Register, Edit, Nominate Roles My Profile Account, Roles, Nominations Help

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - Review and dispute functionality in the Open Payments system is unavailable until April 2016. CMS will announce the beginning of the review and dispute period via the Open Payments listserv.

You may register or affiliate yourself with a teaching hospital, accept or request nominations, and review your profile information. Resources to complete these actions are located on the Resources page of the Open Payments website.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

You can manage your user profile and perform the actions associated with your profile. Note: In order to be able to review all records submitted for you, you must have entered your NPI, if available, and all state licenses under your profile details in Open Payments system.

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Open Payments User Guide

Step 2: From the drop-down menus, select the physician and program year for which you wish to review data submitted by applicable manufacturers and applicable GPOs. Select “Show Records.”

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 physician (including principal investigators) and program year from the drop-down list below, then select "Show Records." This will display records relating to payments or other transfers of value, or ownership or investment interests for the selected physician or principal investigator and program year that are disputed.

Physicians, teaching hospitals, and principal investigators may initiate disputes with reporting entities from the start of the review and dispute period until the end of the calendar year. There is an initial 45-day review and dispute period for physicians, teaching hospitals, and principal investigators to review and dispute their data, followed by a 15-day correction period for reporting entities to resolve disputes and make necessary corrections to the data prior to publication.

Note: Only records on which a dispute was initiated at least once during the 45-day review and dispute period and not resolved within the 15-day correction period will be published as disputed in the initial data publication for that year.

Any disputes initiated for the first time after the 45-day review and dispute period and not resolved within the 15-day correction period will be published as not disputed in the initial data publication for that year.

Only records for which attestation was completed by the submission deadline in that calendar year will be eligible for the review and dispute process for that calendar year.

For a complete list of review and dispute rules, refer to the [User Guide](#) located under "Resources" in [CMS Open Payments](#) website.

*Choose a Physician:
Mary Davis

*Program Year:
2015

Show Records

Access the Open Payments User Guide
Need help with the website? Contact Us by email
Review the Open Payments Privacy Policy [PDF, 102 KB]

If the chosen physician has no records associated with him or her, you will receive a message at the top of the page saying “There are no payments or other transfers of value or ownership or investment interests reported for you or your family members.” If there are records associated with your chosen physician, proceed to Step 3.

Open Payments User Guide

Step 3: On the Review and Dispute page, you will see a list of all submitted records for the chosen physician. If you wish, you may filter the records by selecting the “Entity Making Payment” from the specified drop-down. You may also filter further by including the Record ID, and/or Dispute ID. For instructions on how to export this data, see Section 7.1d.

You may also search records by “Recipient” or “Principal Investigator.” When a user selects the “Recipient” checkbox, the system will only display records on which the physician is reported as a covered recipient. When a user selects the “Principal Investigator” checkbox, the system will only display records on which the physician is reported as a principal investigator. **Note: Principal Investigators (PIs) may only dispute their own association with a record and their own personal identifying information given in the record. They cannot dispute any other information in the record, such as payment amount, nature of payment, etc.**

Scroll to the right and select “View” under the column title “View Record” if you wish to view the record details. On the individual record’s detail page, you will see the specifics of the record and the reporting entity’s designated review and dispute point of contact.

Select the checkboxes next to the record(s) you wish to dispute, then select “Dispute Record.”

Open Payments (Sunshine Act)

Physician Switch User Type

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

Review and Dispute - Mary Davis - 2015

[Back](#)

The table below displays all records reported for the selected physician or principal investigator during the selected program year.

The list is organized by reporting entity, including reporting entities that reported 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 the reporting entities by the submission deadline of that calendar year will be displayed. For a complete set of review, dispute, and publication rules, please refer to the Open Payments User Guide on the "Resources" page on the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>.

Please note: There may be 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.

You may export your filtered search results into a CSV file by selecting the link labeled "Download Zip File." Only one CSV file will be generated containing all three payment categories. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Entity Making Payment column:

- 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 an explanation for your dispute of the record. Note: If you are listed as principal investigator (PI-Only) you may dispute only your identification as a principal investigator for the record and identifying information, such as your name, NPI (if applicable), and license details.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record. The record must be in a Review and Dispute status of "Initiated" or "Acknowledged" in order to be withdrawn.

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:
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

Reported As:
 Recipient
 Principal Investigator

[Download Zip File](#)
[Search](#)
[Clear All](#)

Showing Results for: [All]

Show Entries 10

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

Select	Entity Making Payment	Record ID	Payment Category	Principal Investigator Associated?	Physician Listed as PI only?	Date of Payment	Amount(\$)	Dispute ID	Review and Dispute Status	Date Dispute Initiated	History Of Dispute	Delay in Publication of Research Payment Indicator	Affirmed (Yes/No)
<input type="checkbox"/>	WXYZ Medical	664745	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	Yes
<input checked="" type="checkbox"/>	WXYZ Medical	664725	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No
<input type="checkbox"/>	WXYZ Medical	664715	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No
<input type="checkbox"/>	WXYZ Medical	664735	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No

Page 1 of 1 Page 1 Go

Open Payments User Guide

Step 4: Review the information on the Dispute Records page. You must enter a reason the dispute has been initiated in the “Dispute Details” text box before continuing. The text box can contain up to 4,000 characters, including spaces, and allows all special characters on a standard U.S. keyboard (not including ALT+NUMPAD ASCII Key characters). **It is recommended that you add review and dispute contact information, such as an email address and/or phone number, within the text box,** as this will assist the reporting entity in resolving the dispute in a timely manner.

When you select “Send Dispute,” the system will send an email to the reporting entity or entities notifying them that a dispute has been initiated. This email will include the contents of the “Dispute Details” text box. If a dispute is initiated for multiple records across multiple reporting entities simultaneously, all reporting entities referenced in the dispute will receive the same email notification including the “Dispute Details” text. **If the reasons for dispute vary for each disputed record, perform the actions above separately for each dispute to ensure the correct reasons are provided to each reporting entity.**

Open Payments (Sunshine Act)
Physician Switch User Type

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

Dispute Records

A field with an asterisk (*) is required.

Mary Davis - 2015

[Back](#)

In the "Dispute Details" text box below, explain the reason for disputing the record. You may also use this text box to provide contact information for reporting entities to directly contact you.

If you are listed as a principal investigator, you may only dispute your association with the payment or any inaccurate identifying information.

If multiple disputes are initiated at the same time across multiple reporting entities, the text entered in the "Dispute Details" text box will be sent to all of those reporting entities. If you have different reasons for disputing each record, you should dispute each one individually.

When finished, select "Send Dispute" the status of the dispute will then be updated to "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
664725	WXYZ Medical	2015-01-04	\$26,000.66	Attested	

*Dispute Details: 
4,000 characters maximum

Enter dispute details.

[Cancel](#) [Send Dispute](#)

Open Payments User Guide

The following “Dispute Confirmed” message will be displayed on the page. An email notification will be sent to the reporting entity. Select “Continue” to return to the “Review and Dispute” page.

Open Payments (Sunshine Act)
Physician Switch User Type

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

Disputes Confirmed

Mary Davis - 2015

Continue

You have successfully initiated the following dispute(s).
An email has been sent to notify the reporting entity.
Date Dispute(s) Initiated: 12/15/2015 11:43 AM

Record ID	Dispute ID Assigned	Entity Making Payment
664725	4320	WXYZ Medical

Dispute Details:
Enter dispute details.

Continue

You will receive an email notification from the Open Payments system when the status of your disputed record changes. If, as part of the resolution to the dispute, the physician or principal investigator identified in the record is changed so that you are no longer identified as a covered recipient, you will no longer see that record in your profile. If the record is deleted, you will no longer see it in your profile.

Open Payments (Sunshine Act)

Physician Switch User Type

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

Review and Dispute - Mary Davis - 2015

[Back](#)

The table below displays all records reported for the selected physician or principal investigator during the selected program year.

The list is organized by reporting entity, including reporting entities that reported 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 the reporting entities by the submission deadline of that calendar year will be displayed. For a complete set of review, dispute, and publication rules, please refer to the Open Payments User Guide on the "Resources" page on the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>.

Please note: There may be 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.

You may export your filtered search results into a CSV file by selecting the link labeled "Download Zip File." Only one CSV file will be generated containing all three payment categories. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Entity Making Payment column:

- 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 an explanation for your dispute of the record. Note: If you are listed as principal investigator (PI-Only) you may dispute only your identification as a principal investigator for the record and identifying information, such as your name, NPI (if applicable), and license details.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record. The record must be in a Review and Dispute status of "Initiated" or "Acknowledged" in order to be withdrawn.

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:
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

Reported As:
 Recipient
 Principal Investigator

[Download Zip File](#)
[Search](#)
[Clear All](#)

Showing Results for: [All]

Show Entries: 10

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

Select All	Entity Making Payment	Record ID	Payment Category	Principal Investigators Associated?	Physician Listed as PI only?	Date of Payment	Amount(\$)	Dispute ID	Review and Dispute Status	Date Dispute Initiated	History Of Dispute	Delay in Publication of Research Payment Indicator	Affirmed (Yes/No)
<input type="checkbox"/>	WXYZ Medical	664725	General Payments	N/A	N/A	2015-01-04	\$26,000.66	4320	Initiated	2015-12-15	View	No	No
<input type="checkbox"/>	WXYZ Medical	664745	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	Yes
<input type="checkbox"/>	WXYZ Medical	664735	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No
<input type="checkbox"/>	WXYZ Medical	664715	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No

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Open Payments User Guide

7.3d: Physician and Principal Investigator - Withdrawing a Dispute

Step 1: Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page, and select the “Review and Dispute” tab on the menu bar.

Open Payments (Sunshine Act)
Physician Switch User Type

Home | **Review and Dispute** (Review, Affirm, Dispute) | Manage Physicians (Register, Edit, Nominate Roles) | My Profile (Account, Roles, Nominations) | Help

Welcome to the Open Payments System

Announcements

2015 Program Year General Information - Review and dispute functionality in the Open Payments system is unavailable until April 2016. CMS will announce the beginning of the review and dispute period via the Open Payments listserv.

You may register or affiliate yourself with a teaching hospital, accept or request nominations, and review your profile information. Resources to complete these actions are located on the Resources page of the Open Payments website.

Visit the Open Payments website at www.cms.gov/openpayments for important announcements, upcoming events, and information. Refer to the Resources page of the Open Payments website for educational materials. If you have questions, contact the Open Payments Help Desk by email at openpayments@cms.hhs.gov or by phone at 1-855-326-8366.

You can manage your user profile and perform the actions associated with your profile. Note: In order to be able to review all records submitted for you, you must have entered your NPI, if available, and all state licenses under your profile details in Open Payments system.

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

Step 2: From the drop-down menus, select the physician and program year for which you wish to review data submitted by applicable manufacturers and applicable GPOs. Select “Show Records.”

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 physician (including principal investigators) and program year from the drop-down list below, then select "Show Records." This will display records relating to payments or other transfers of value, or ownership or investment interests for the selected physician or principal investigator and program year that are disputed.

Physicians, teaching hospitals, and principal investigators may initiate disputes with reporting entities from the start of the review and dispute period until the end of the calendar year. There is an initial 45-day review and dispute period for physicians, teaching hospitals, and principal investigators to review and dispute their data, followed by a 15-day correction period for reporting entities to resolve disputes and make necessary corrections to the data prior to publication.

Note: Only records on which a dispute was initiated at least once during the 45-day review and dispute period and not resolved within the 15-day correction period will be published as disputed in the initial data publication for that year.

Any disputes initiated for the first time after the 45-day review and dispute period and not resolved within the 15-day correction period will be published as not disputed in the initial data publication for that year.

Only records for which attestation was completed by the submission deadline in that calendar year will be eligible for the review and dispute process for that calendar year.

For a complete list of review and dispute rules, refer to the [User Guide](#) located under "Resources" in [CMS Open Payments](#) website.

*Choose a Physician:
Mary Davis

*Program Year:
2015

Show Records

- Access the Open Payments User Guide
- Need help with the website? Contact Us by email
- Review the Open Payments Privacy Policy [PDF, 102 KB]

If the chosen physician has no records associated with him or her, you will receive a message at the top of the page saying “There are no payments or other transfers of value or ownership or investment interests reported for you or your family members.” If there are records associated with your chosen physician, proceed to Step 3.

Open Payments User Guide

Step 3: On the Review and Dispute page, you will see a list of all submitted records for the chosen physician. If you wish, you may filter the records by selecting the “Entity Making Payment” from the specified drop-down. For instructions on how to export this data, see Section 7.1d.

You may also filter further by including the Record ID, and/or Dispute ID. You may also search records by “Recipient” or “Principal Investigator.” When a user selects the “Recipient” checkbox, the system will only display records on which the physician is reported as a covered recipient. When a user selects the “Principal Investigator” checkbox, the system will only display records on which the physician is reported as a principal investigator.

Scroll to the right and select “View” under the column title “View Record” if you wish to view the record details. On the individual record’s detail page, you will see the specifics of the record and the reporting entity’s designated review and dispute point of contact.

Select the checkboxes next to the disputed record(s) you wish to withdraw. You may only withdraw disputes on records with a review and dispute status of “Initiated” or “Acknowledged.” After you have selected the record(s), select “Withdraw Dispute.”

Open Payments (Sunshine Act)

Physician Switch User Type

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

Review and Dispute - Mary Davis - 2015

[Back](#)

The table below displays all records reported for the selected physician or principal investigator during the selected program year

The list is organized by reporting entity, including reporting entities that reported 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 the reporting entities by the submission deadline of that calendar year will be displayed. For a complete set of review, dispute, and publication rules, please refer to the Open Payments User Guide on the "Resources" page on the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>

Please note: There may be 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.

You may export your filtered search results into a CSV file by selecting the link labeled "Download Zip File." Only one CSV file will be generated containing all three payment categories. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Entity Making Payment column:

- 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 an explanation for your dispute of the record. Note: If you are listed as principal investigator (PI-Only) you may dispute only your identification as a principal investigator for the record and identifying information, such as your name, NPI (if applicable), and license details.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record. The record must be in a Review and Dispute status of "Initiated" or "Acknowledged" in order to be withdrawn.

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:
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

Reported As:
 Recipient
 Principal Investigator

[Download Zip File](#)
[Search](#)
[Clear All](#)

Showing Results for: [All]

Show Entries 10

[Affirm Record](#)

[Dispute Record](#)

[Withdraw Dispute](#)

Select	Entity Making Payment	Record ID	Payment Category	Principal Investigators Associated?	Physician Listed as PI only?	Date of Payment	Amount(\$)	Dispute ID	Review and Dispute Status	Date Dispute Initiated	History Of Dispute	Delay in Publication of Research Payment Indicator	Affirmed (Yes/No)
<input checked="" type="checkbox"/>	WXYZ Medical	664725	General Payments	N/A	N/A	2015-01-04	\$26,000.66	4320	Initiated	2015-12-15	View	No	No
<input checked="" type="checkbox"/>	WXYZ Medical	664745	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	Yes
<input type="checkbox"/>	WXYZ Medical	664735	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No
<input type="checkbox"/>	WXYZ Medical	664715	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No

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Open Payments User Guide

Step 4: Review the information on the Withdraw Disputes page. If the information is correct, select “Withdraw Disputes.” If the information is not correct, select “Back” and either change which record you are withdrawing or perform another action.

Open Payments (Sunshine Act)
Physician [Switch User Type](#)

Home | **Review and Dispute** (Review, Affirm, Dispute) | **My Profile** (Account, Roles, Nominations) | **Help**

Withdraw Disputes

Mary Davis - 2015

[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
4320	664725	2015-01-04	\$26,000.66	WXYZ Medical	Initiated	Attested	2015-12-15

[Cancel](#) | [Withdraw Disputes](#)

Open Payments User Guide

The following message will be displayed on the page. An email notification will be sent to the reporting entity.

Open Payments (Sunshine Act)

Physician Switch User Type

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

Review and Dispute - Mary Davis - 2015

You have successfully withdrawn the following dispute(s):

Record ID	Dispute ID
664725	4320

An email has been sent to notify the reporting entity.

Back

The table below displays all records reported for the selected physician or principal investigator during the selected program year.

The list is organized by reporting entity, including reporting entities that reported 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 the reporting entities by the submission deadline of that calendar year will be displayed. For a complete set of review, dispute, and publication rules, please refer to the Open Payments User Guide on the "Resources" page on the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>.

Please note: There may be 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.

You may export your filtered search results into a CSV file by selecting the link labeled "Download." Only one CSV file will be generated containing all three payment categories. The file will be compressed into a ZIP file. It will contain all data fields displayed in the table below and other data elements related to the record. To view all fields for a record, select the "Record ID" hyperlink next to the record you want to view in the table below.

To perform any of the following actions, select the check box for that record next to the Entity Making Payment column:

- 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 an explanation for your dispute of the record. Note: If you are listed as principal investigator (PI-Only) you may dispute only your identification as a principal investigator for the record and identifying information, such as your name, NPI (if applicable), and license details.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record. The record must be in a Review and Dispute status of "Initiated" or "Acknowledged" in order to be withdrawn.

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:** **Dispute ID:**

Please Select Maximum 38 digits Maximum 38 digits

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

Reported As:

Recipient

Principal Investigator

[Download](#) [Search](#) [Clear All](#)

Showing Results for: [All]

Show Entries 10
[Affirm Record](#)
[Dispute Record](#)
[Withdraw Dispute](#)

Select	Entity Making Payment	Record ID	Payment Category	Principal Investigator Associated?	Physician Listed as PI Only?	Date of Payment	Amount	Dispute ID	Review and Dispute Status	Date Dispute Initiated	History of Dispute	Delay in Publication of Research Payment Indicator	Affirmed (Yes/No)
<input type="checkbox"/>	WXYZ Medical	664725	General Payments	N/A	N/A	2015-01-04	\$26,000.66	4320	Withdrawn	2015-12-15	View	No	No
<input type="checkbox"/>	WXYZ Medical	664745	General Payments	N/A	N/A	2015-01-03	\$20,000.66					No	Yes
<input type="checkbox"/>	WXYZ Medical	664725	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No
<input type="checkbox"/>	WXYZ Medical	664715	General Payments	N/A	N/A	2015-01-04	\$26,000.66					No	No

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PART V: PUBLIC DATA PUBLISHING

Chapter 8: Data Publication

The Open Payments program provides information to the general public on payments and other transfers of value made by industry to physicians and teaching hospitals, as well as physician ownership or investment interests in industry. This information is made public on <https://openpaymentsdata.cms.gov/> for online browsing and downloading.

This chapter provides general information about the Open Payments published data, publication criteria, exclusions to the publication, and links to additional resources. For details on reporting requirements, data submissions, and the review and dispute process, please see the corresponding chapters in this User Guide.

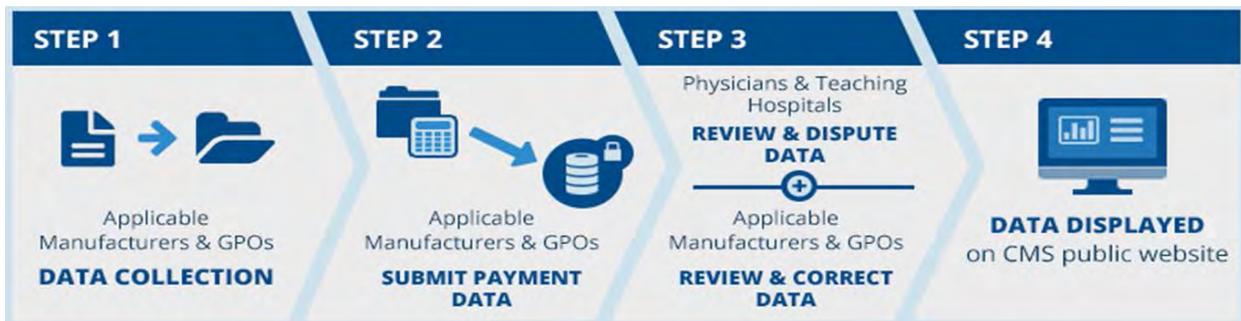
For a more detailed guide to Open Payments data publication, refer to the “Open Payments Methodology Overview and Data Dictionary,” which provides the publication rules, limitations, and exclusions, the data files available from CMS, the fields in each data file, and how to download them. This document is available at <https://www.cms.gov/OpenPayments/Explore-the-Data/Data-Overview.html>.

Section 8.1: Methodology

Applicable manufacturers and applicable group purchasing organizations (GPOs) are required to submit data about payments and other transfers of value made to physicians and teaching hospitals between January 1 and December 31 of each program year. They are also required to submit information regarding ownership or investment interests held by physicians or their immediate family members during the program year.

This data may then be reviewed and, if necessary, disputed by the physicians and teaching hospitals associated with those records. This data is then made available to the public at <https://openpaymentsdata.cms.gov/> for online browsing and downloading. Data submitted to Open Payments that is eligible for publication is published twice annually; first, in an initial publication, and then in a refresh publication. Figure 8.1, below, provides a high-level representation of the various periods during a given program year.

Figure 8.1: Steps of the Open Payments Program



Open Payments User Guide

Only data submitted and attested to by the data submission deadline are eligible for publication in the subsequent initial and refresh publications. Data submitted and attested after the data submission deadline are considered late and will not be eligible for publication until the initial publication in the following calendar year.

Data submitted to Open Payments that is eligible for publication is published twice annually, as explained below. Explanations of record limitations, exclusions, and ineligibility are given in Section 8.3 and the publication rules are in Section 8.4.

- **June 30 Publication - Initial Publication**
 - The first publication of the eligible records submitted for the latest program year.
 - The republication of eligible records from prior program years, including updates to previously published records made since the previous publication.
 - The data published is the latest attested version of the data at the end of the correction period.
- **Early Publication - Refresh Publication**
 - The second publication of eligible records for the latest program year and prior program years. It contains changes made to records after the correction period and before the end of the calendar year (or before the refresh cutoff date in November for records not under dispute).
 - The data published is the latest attested version of the data at the end of the calendar year.

For example, the June 30, 2016 data publication included the initial publication of the Program Year 2015 data and republication of prior program years. The Early 2017 data publication will include the refresh publication of program year 2015 data and republication of prior program years.

8.1a: Effect of Disputes on Data Publication

If a dispute is resolved by making corrections to the record(s), whether the updated data will be published depends upon when the records were corrected. See Section 8.1, above, for an explanation of which version of the data will be published.

Records still under dispute at the time of publication may be published with an indicator that identifies those records as being under dispute. Whether a record is identified as disputed in data publications depends upon when the dispute was initiated and when/if the dispute was resolved. The table below lists scenarios for dispute initiation and resolution and explains how records are identified in data publications based upon those scenarios.

Open Payments User Guide

Figure 8.1: Records Identified as Disputed

Dispute Initiated/Resolved	Published As Disputed in Initial Publication?	Published As Disputed in Refresh Publication?
Initiated: During the 45-day Review and Dispute Period Resolved: By the end of the 15-day Correction Period	No	No
Initiated: During the 45-day Review and Dispute Period Resolved: After the end of the 15-day Correction Period	Yes	Yes, unless the dispute is resolved before the end of the calendar year
Initiated: During the 15-day Correction Period Resolved: By the end of the 15-day Correction Period	No	No
Initiated: During the 15-day Correction Period Resolved: After the end of the 15-day Correction Period	No	Yes, unless the dispute is resolved before the end of the calendar year
Initiated: After the Correction Period Resolved: By the end of the calendar year	No	No
Initiated: After the Correction Period Resolved: After the end of the calendar year	No	Yes

Note: If a record was initially disputed during the 45-day review and dispute period and more disputes are initiated on that same record during the 15-day correction period, then the data attested to as of the end of the 15-day correction period is published in the initial publication, including any changes made due to dispute resolution.

Section 8.2: Data Sources and Types

Applicable manufacturers and applicable GPOs must enter detailed information about payments, other transfers of value, or investment interests into CMS’s Open Payments system.

These payments, other transfers of value, and ownership or investment interests are categorized into three (3) payment types:

1. **General Payments:** Payments or other transfers of value not made in connection with a research agreement or research protocol.
2. **Research Payments:** Payments or other transfers of value made in connection with a research agreement or research protocol.
3. **Physician Ownership or Investment Interest Information:** Information about physicians who hold an ownership or investment interest in an applicable manufacturer or applicable GPO or who have an immediate family member holding such interest.

Section 8.3: Reporting Limitations and Exclusions

The Open Payments data published by CMS is subject to limitations and exclusions.

Certain payments or other transfers of value are excluded from reporting, such as product samples and educational materials intended for patient use. Records of such payments and other transfers of value should not be submitted to the Open Payments system. These exclusions are outlined in the Open Payments final rule, at 42 C.F.R. § 403.904(i), available at <https://www.cms.gov/Regulations-and-Guidance/Legislation/National-Physician-Payment-Transparency-Program/Downloads/Final-Rule.pdf>.

Payment records will only be accepted by the Open Payments system if they are both successfully validated and successfully matched to a valid physician or teaching hospital.

Section 8.4: Publication Rules

The publication rules for Open Payments are as follows:

- Eligible records submitted and attested before the end of the data submission period will be published in that year's initial and data refresh publications.
- The data published in the June 30 (initial) publication is the latest attested version of the data at the end of the correction period.
- The data published in the Early (refresh) publication is the latest attested version of the data at the end of the calendar year.

Records may not be eligible for publication based upon publishing limitations. See Section 8.4.1a for details.

8.4a: Publishing Limitations

The following limitations apply to what records are published by CMS through the Open Payments program:

1. **Data submitted and attested after the submission deadline** is considered late and will not be included in the initial publication or the next data refresh publication. Late submissions may be eligible for publication in the following calendar year's data publication.
2. **Records in which physician or physician principal investigator identifying information is changed after the submission deadline** will not be included in the initial publication or the next data refresh publication. These records may be eligible for publication in the following calendar year's data publication.
3. **Records deleted** prior to the end of the correction period for that year will not be published in the initial data publication or in any subsequent publications.
 - Records deleted after the correction period but prior to December 31 of that calendar year will be published in the initial publication but will be removed in the data refresh publication and any subsequent publications.

4. **Records without disputes against them that are updated after the end of the submission period** will not have those updates included in the initial data publication.
 - The updated version of the record may be eligible for the next data refresh publication if it was resubmitted and attested by the refresh cutoff date in November of that year.
 - Updates to undisputed records that are resubmitted and attested after the refresh cutoff date in November will not be published in the subsequent refresh publication but may be eligible for publication in the following calendar year's publication.
5. **Records that had been published previously and were then edited after their publication** and not re-attested to by the end of the next correction period are not published.
6. **Reporting entities may request a delay in the publication of research payment records** if the records relate to research or development of a new drug, biological, device, or medical supply; a new application of an existing drug, biological, device, or medical supply; or clinical investigations regarding a new drug, biological, device, or medical supply. These payments will be published in later Open Payments publications as appropriate. See the Open Payments Final Rule, at 42 C.F.R. § 403.910, available at <https://www.cms.gov/Regulations-and-Guidance/Legislation/National-Physician-Payment-Transparency-Program/Downloads/Final-Rule.pdf>.
 - Records for which submitters requested a delay in publication or a renewal of a delay in publication prior to the end of the submission period will not be published for one year. These records will be eligible for publication in the next year's publication, unless the delay in publication is renewed for another year.
 - Records with a delay in publication request removed after the end of the submission period that do not have a dispute against them will not be published in the initial publication, but will be published in the refresh publication.
7. **Program year 2013** includes only data collected from August 1– December 31, 2013. All subsequent program year publications contain data collected from the entire calendar year (January 1 – December 31).

Section 8.5: Data in Context

The context of the data is shown in two different ways. General contextual information about the program can be found on the “Data in Context” page on the Open Payments website. In addition, context at the individual payment level is also available when reported by the applicable manufacturer or applicable GPO. This data is posted exactly as it was submitted and was not altered by CMS. This may be viewed when exploring the data.

Section 8.6: Accessing the Data

Open Payments data can be accessed at <https://openpaymentsdata.cms.gov>. From this site, all Open Payments data can be viewed online and downloaded.

8.6a: Online Data Access

CMS has made available two tools for online viewing. One is the Search Tool, which allows users to search Open Payments data for physicians, teaching hospitals, and companies making payments. The other online viewing tool is the Data Explorer tool, which allows users to browse datasets; search records by physician, teaching hospital, principal investigator, and reporting entity; and filter the data.

8.6b: Downloading the Data

CMS has made available the capability to download complete Open Payments data sets. Data sets for all program years are available. The data sets are contained in downloadable ZIP files. Each program year zip file contains several comma-delimited character-separated value (CSV) files and a README text file. The program year is included in each ZIP file's name.

Also available for download is a supplement file that contains more detailed information about physicians who were indicated as recipients of payments, other transfers of value, or as holding ownership or investment interests in applicable manufacturers on records that were published by CMS through the Open Payments program. The supplement file also contains information about physician principal investigators who were associated with research payments or other transfers of value in records published by CMS through the Open Payments program. The supplement file contains only physicians who have at least one payment record associated with them that has been published by CMS through the Open Payments program. This list is available in a downloadable ZIP file, which contains a comma-delimited character-separated value (CSV) file and a README text file.

CMS recommends against using Windows File Compression to decompress downloaded files. Programs recommended for file decompression are WinZip, WinRAR, and 7-Zip.

The **Program Year zip files** contain CSV files of the following types:

- **General Payments Details**
 - General payment records provide the total value of general payments or other transfers of value to a particular recipient for a particular date.
 - Each record includes identifying information for the applicable manufacturer or applicable GPO who made the payment, and identifying information for the recipient.
 - Each record also lists, if applicable, up to five covered drugs or biologicals, or up to five covered devices or medical supplies, if the payment was made in relation to any such products.
- **Research Payments Details**
 - Research payment records provide the total value of a payment or other transfer of value made for research purposes to a particular recipient for a particular date.
 - Each record includes identifying information for the applicable manufacturer or applicable GPO who made the payment, and identifying information for the recipient. Information is

Open Payments User Guide

also provided for up to five physician principal investigators associated with the payment.

- Each record also lists, if applicable, up to five covered drugs or biologicals, or up to five covered devices or medical supplies.
- **Physician Ownership Details** – The complete published data set for physician ownership or investment interest data. Physician ownership records provide information on physician ownership or investment interests in an applicable manufacturer or applicable GPO.
- **Deleted and Removed Records** – The Deleted Records File contains the Record ID, Payment Type, and Program Year of records that were previously published and have been deleted or removed from the Open Payments system for that program year.
 - Note: The initial publication of a program year’s data will not include a Deleted and Removed Record file, as the initial publication contains records that have not been previously published.

Records for all three payment categories (general, research, physician ownership) now include a Change Type indicator that explains the record’s status relating to previous publications.

Figure 8.3: Change Type Values and Meanings for Payment Records

Change Type value	Meaning
NEW	The payment record is new and is being published for the first time
ADD	The payment record is being published for the first time despite having been submitted during an earlier submission period; the record had been ineligible for publication until the current publication
CHANGED	The payment record has been previously published but modified since its last publication, including updates to a dispute status
UNCHANGED	The payment record is being republished without change in the current publication.

Records in Deleted and Removed Records files also have a Change Type indicator. In Deleted and Removed Records files, the indicator states whether the record was deleted or removed.

The text file in the program year zip files is:

- **README** – A text file that provides information about the files available for download, their formats, special handling considerations, and other alternatives for viewing the Open Payments data.

Open Payments User Guide

A complete list of data elements displayed in the General Payments Details, Research Payments Details, Physician Ownership Details, and Deleted Records files, including descriptions and sample data for each data element, can be found in the Open Payments Methodology Overview and Data Dictionary.

Also available for download is the **Physician Profile Supplement Detail zip file**, which contains one (1) CSV file and one (1) README file. The CSV file contains all of the identifying information for physicians who were indicated as recipients of payments, other transfers of value, or ownership and investment interest in Open Payments records, as well as physician principal investigators who were associated with payments or other transfers of value. The README file provides information about the contents of the CSV file. A complete list of data elements displayed in the Physician Profile Supplement File, including descriptions and sample data for each data element, can be found in the Open Payments Methodology Overview and Data Dictionary.

Note: The CSV data files may be too large for Microsoft Excel and other common spreadsheet programs. Excel cannot display worksheets with more than 1,048,576 rows. To display the data in its entirety requires the use of programs capable of handling very large numbers of records.

Appendices

Appendix A: Glossary of Terms for Open Payments

Applicable Manufacturer:

Applicable manufacturers are entities that operate in the United States and (1) are engaged in the production, preparation, propagation, compounding, or conversion of a covered drug, device, biological, or medical supply, but not if such covered drug, device, biological, or medical supply is solely for use by or within the entity itself or by the entity's own patients (this definition does not include distributors or wholesalers (including, but not limited to, repackagers, relabelers, and kit assemblers) that do not hold title to any covered drug, device, biological, or medical supply); or (2) are entities under common ownership with an entity described in part (1) of this definition, which provides assistance or support to such entities with respect to the production, preparation, propagation, compounding, conversion, marketing, promotion, sale, or distribution of a covered drug, device, biological, or medical supply. (See 42 C.F.R. § 403.902)

Applicable Group Purchasing Organization (GPO):

Applicable group purchasing organizations (GPOs) are entities that operate in the United States and purchase, arrange for, or negotiate the purchase of covered drugs, devices, biologicals, or medical supplies for a group of individuals or entities, but not solely for use by the entity itself. (See 42 C.F.R. § 403.902)

Assistance or Support:

Assistance or support means to provide a service or services needed to produce, prepare, propagate, compound, convert, market, promote, sell, or distribute a covered drug, device, biological, or medical supply. (See 42 C.F.R. § 403.902)

Biologicals:

For the purpose of Open Payments, biologicals are defined as in Section 1927(k)(2)(B) of the Social Security Act, which includes a cross-reference to licensure under Section 351 of the Public Health Service Act ("PHS Act").

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Common Ownership:

Common ownership is when the same individual, individuals, entity, or entities directly or indirectly own five-percent or more of two entities. This includes, but is not limited to, parent corporations, direct and indirect subsidiaries, and brother or sister corporations. (See 42 C.F.R. § 403.902)

Consolidated Report:

A consolidated report is a report filed by an applicable manufacturer, which includes payments or other transfers of value to covered recipients, physician owners or investment interests for the applicable manufacturer filing and applicable manufacturers under common ownership. (See 42 C.F.R. § 403.908(d))

Covered Recipients:

Covered recipients are any physicians (see [Physicians](#) for an extensive explanation of how Open Payments defines this group) who are not employees of the applicable manufacturer that is reporting the payment; or teaching hospitals that receive payment for Medicare direct graduate medical education (GME), inpatient prospective payment system (IPPS) indirect medical education (IME), or psychiatric hospital IME programs during the last calendar year for which such information is available. (See 42 C.F.R. § 403.902)

General Payments:

Payments or other transfers of value not made in connection with a research agreement or research protocol as required in Open Payments.

Non-Covered Recipient Entity:

Non-covered recipient entities are entities that do not meet the Open Payments definition of a covered recipient (see 42 C.F.R. § 403.902). Non-covered recipient entities may include non-teaching hospitals or clinics. A payment or other transfer of value to a non-covered recipient entity is reportable if it is a research payment with at least one associated covered recipient principal investigator.

Non-Covered Recipient Individual:

Non-covered recipient individuals are individuals who do not meet the Open Payments definition of a covered recipient (see 42 C.F.R. § 403.902). Non-covered recipient individuals may include non-physician employees of a teaching hospital or physician-owned practice. A payment or other transfer of value to a non-covered recipient individual is reportable if it is a research payment with at least one associated covered recipient principal investigator.

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Open Payments:

Open Payments is a national transparency program which requires:

- Applicable manufacturers of covered drugs, devices, biologicals, or medical supplies to report information about payments or other transfers of value to physicians and teaching hospitals to CMS every year.
- Applicable manufacturers and applicable group purchasing organizations (GPOs) to report information about ownership and investment interests held by physicians or their immediate family members to CMS every year.
- Applicable GPOs to report information about payments or other transfers of value made to physicians owners and investment interests to CMS every year.

Physicians:

For the purposes of Open Payments, physicians are defined as doctors of medicine or osteopathy practicing medicine or surgery, doctors of dental medicine or dental surgery practicing dentistry, doctors of podiatric medicine, doctors of optometry, or chiropractors, all legally authorized to practice by their state.

Physician Owners or Investors:

Physicians who have an ownership or investment interests in an applicable manufacturer or applicable group purchasing organization. Applicable manufacturers and applicable group purchasing organizations are required to report ownership or investment interests held by a physician or a physician's immediate family member in an applicable manufacturer or applicable group purchasing organization.

Research Payments:

Payments or other transfers of value made in connection with a research agreement or research protocol as required in Open Payments.

Special Characters:

Characters that are neither letters nor numbers. Special characters include punctuation, spaces, and other non-alphanumeric symbols.

Special characters are required in registration fields where appropriate. For example, the "@" symbol and the period are required in email address fields, while dashes are required in telephone number fields.

Data elements of submitted records may contain only the special characters allowed per the "Submission Data Mapping Document," which is found on the Resources page of the Open

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Payments website at <http://cms.gov/OpenPayments/About/Resources.html>. *Free text fields* allow all special characters found on a standard U.S. keyboard, not including ALT+NUMPAD ASCII Key characters. The table below lists the special characters allowed in free text fields.

Figure A-1: Special Characters Allowed in Free-Text Fields

Special Character	Description
+	Addition
&	Ampersand
'	Apostrophe
*	Asterisk
@	At
\	Backslash
^	Caret
:	Colon
,	Comma
\$	Dollar
Space	Empty space
=	Equals
!	Exclamation mark
/	Forward slash
`	Grave accent
>	Greater than
-	Hyphen
(Left bracket
{	Left curly brackets
[Left Square Brackets
<	Less than
%	Percent
.	Period
#	Pound
?	Question mark
"	Quotation marks
)	Right bracket
}	Right curly brackets
]	Right square brackets
;	Semi-colon
	Sheffer stroke
-	Subtraction
~	Tilde

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Characters used in foreign languages that are not used in English must be converted to English characters to be acceptable to the Open Payments system. Refer to the conversion table below.

Figure A.2: Conversions for Foreign Language Characters

Foreign Character	Convert to English Character
À	A
Á	A
Â	A
Ã	A
Ä	A
Å	A
È	E
É	E
Ê	E
Ë	E
Ì	I
Í	I
Î	I
Ï	I
Ò	O
Ó	O
Ô	O
Õ	O
Ö	O
Ø	O
Ù	U
Ú	U
Û	U
Ü	U

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Teaching Hospital:

Teaching hospitals are hospitals that receive payment for Medicare direct graduate medical education (GME), IPPS indirect medical education (IME), or psychiatric hospital IME programs during the last calendar year for which such information is available. (See 42 C.F.R. § 403.902). The full list of affected teaching hospitals can be found on the Resources page of the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>.

Appendix B: Submission Error Codes

Error codes generated by the Open Payments system for records with validation errors can be found in the Error Code Key, which is located on the Resources page of the Open Payments website at <http://cms.gov/OpenPayments/About/Resources.html>.

Appendix C: Medicare Provider/Supplier to Healthcare Provider

Taxonomy

Provider taxonomy codes can be found at: <https://www.cms.gov/OpenPayments/Downloads/Physician-Taxonomy-Crosswalk.pdf>.