

#### **Open Payments** Overview and Enhancements

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

CREATING PUBLIC TRANSPARENCY INTO INDUSTRY-PHYSICIAN FINANCIAL RELATIONSHIPS January 2025

CMS Disclaimer: This information is a summary of the final rule implementing Open Payments (Medicare, Medicaid, Children's Health Insurance Programs; Transparency Reports and Reporting of Physician Ownership or Investment Interests [CMS-5060-F], codified at 42 CFR Parts 402 and 403). The summary is not intended to take the place of the final rule which is the official source for information on the program.

## Outline

- Open Payments System Overview
- Open Payments System Enhancements
- Next Steps and Available Resources

## **Target Audience & Learning Objectives**

- Target audience:
  - Reporting entities that need to submit data to the Open Payments system to comply with regulatory and reporting requirements
  - Covered recipients who want to review and possibly dispute payment records associated with them that have been reported to Open Payments
- Learning objective:
  - Understand the Open Payments system and enhancements



- Reporting Entities refers to pharmaceutical and medical device manufacturers and their distributors who are required to report payments and other transfers of value to Open Payments; also referred to as Applicable Manufacturers and Applicable Group Purchasing Organizations (AM/GPOs)
- Covered Recipients refers to physicians, non-physician practitioners (NPPs) and teaching hospitals receiving payments or other transfers of value from Applicable Manufacturers and Applicable Group Purchasing Organizations (AM/GPOs)
  - NPPs include physician assistant (PA), nurse practitioner (NP), clinical nurse Specialist (CNS), Certified Registered Nurse Anesthetist or Anesthesiologist Assistant (CRNA/AA) and Certified Nurse-Midwife (CNM)

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

## **Open Payments Program Overview**

## What is Reported?

- Direct or indirect payments or other transfers of value made to covered recipients and physician owners or investors
  - A direct payment is a payment or other transfer of value made directly by reporting entities to a covered recipient (or a physician owner or investor)
  - An indirect payment is a payment or other transfer of value made by a reporting entity to a covered recipient (or a physician owner or investor) through a third party, where the entity requires, instructs, directs, or otherwise causes the third party to provide the payment or transfer of value, in whole or in part, to a covered recipient (or a physician owner or investor)
- Certain ownership or investment interests held by physician owners or investors, or their immediate family members

# Who is Responsible for Reporting?

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.

- Operates in the United States
- Engages in the production, preparation, 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

Applicable Group Purchasing Organizations (GPOs) are required to annually report to CMS.

- Operates in the United States
- 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

# Who is Reported On?

#### **Covered Recipient Physicians**

- Doctors of medicine or osteopathy legally authorized to practice medicine or surgery by the state
- Doctors of dental medicine or dental surgery legally authorized to practice dentistry by the state
- Doctors of Podiatric Medicine licensed by the state and legally authorized to practice podiatry by the state
- Doctors of optometry legally authorized to perform as a doctor of optometry by the state
- Chiropractors licensed by the state and legally authorized to perform by the state

#### **Physician Owners or Investors**

- Physicians who are owners or investors of an applicable manufacturer or applicable GPO
- Immediate family members who have ownership or investment interest in an Applicable Manufacturer Or Applicable GPO: spouse, natural or adoptive parent, child, or sibling, stepparent, stepchild, stepbrother, or stepsister, father-, mother-, daughter-, son-, brother-, or sister-in-law, grandparent or grandchild, spouse of a grandparent or grandchild

## Who is Reported On? (Cont.)

#### Covered Recipient Non-Physician Practitioners

- Physician Assistant (PA)
- Nurse Practitioner (NP)
- Clinical Nurse Specialist (CNS)
- Certified Registered Nurse Anesthetist or Anesthesiologist Assistant (CRNA/AA)
- Certified Nurse-Midwife (CNM)

#### Covered Recipient Teaching Hospitals

- The hospitals that CMS has recorded as receiving payment(s) under Medicare Direct Graduate Medical Education (GME), indirect medical education (IME), or psychiatric hospitals IME programs
- Each year, Open Payments publishes a list of these teaching hospitals; the list is available on the Resources for Reporting Entities page of the Open Payments website at

https://www.cms.gov/OpenPaymen ts/Resources/Reporting-Entities

## **Types of Payments**

- **General Payments**: Payments or other transfers of value made that are not in connection with a research agreement or research protocol
- **Research Payments**: Payments or other transfers of value made in connection with a research agreement or research protocol
- **Ownership or Investment Interest**: Information about physicians or their immediate family members who have an ownership or investment interest in a reporting entity

## **Open Payments Process Flow**



Reporting entities collect payment data for a program year, which runs from January 1 to December 31 Reporting entities submit their data for the program year to the Open Payments system Covered recipients review and, if necessary, dispute submitted data. Reporting entities resolve disputes Program year data is published for public viewing in accordance with the publication guidelines

## Program Year 2024 Timeline



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

#### \*Anticipated date

## Open Payments System Enhancements

#### **Login Enhancements**

- All users may log in to the Open Payments 2.0 System (OPS) environment at the new URL: <u>https://openpayments.system.cms.gov/</u>.
- Existing users may log in with their existing credentials. All user data has been migrated from OPS 1.0 to OPS 2.0.



#### **Registration Enhancements**

New users, who did not have an account in OPS 1.0 and will be registering for the first time in OPS 2.0 will need to follow a two-part registration process:

- Select New User Registration on the OPS 2.0 landing page. This will take them to the CMS Portal Identity Management system (IDM)
  - Establish a user account and request access to the Open Payments system in the CMS's Enterprise Portal Identity Management System (IDM).
  - Complete the identity verification if required for your role
  - Create a profile in the Open Payments system.



## **New User Registration**

New users, who did not have an account in OPS 1.0 and will be registering for the first time in OPS 2.0, will need to follow a two-part registration process:

- Establish a user account and request access to the Open Payments system in CMS's Enterprise Portal Identity Management System (IDM).
- Register a profile in the Open Payments system.



## **OPS User Account Management**

Users can update their IDM profiles in OPS 2.0 by selecting "My IDM Portal Profile" in the menu drop down.

OPS 2.0 redirects users to the IDM Enterprise Portal My Profile page to modify their MFA options and password in another tab. During this process, the user remains logged in to OPS 2.0 and can continue to use the system.

y IDM Portal Profile	View My IDM Portal P	rofile				
y Open Payments						
Overview	First Name:	Middle Na	me:		Last Name:	
D (I D I I	John				Doe	
My Roles & Nominations	Date of Birth:					
	Email Address:	Phone Nur	mber:			
	myemail@personal.com	555-555-	-5555			
	Home Address Line 1:	Home Add	ress Line 2:			
	1 a street					
	City:	State:	Zip Code:	Zip+4 Code:		
	San Antonio	ТХ	78222			

### "Create Profile", "Manage Roles", and "Manage Entities" Enhancements

OPS 2.0 features collapsible help text and organizes individual data entry sections into a workflow. This includes individual sections for personal information, covered recipient information such as Primary type, Taxonomy Code, License information, and Authorized Representative nomination.

• The "Create Profile", "Manage Roles", and "Manage Entities" sections feature a vertical navigation panel that shows the user where they are in the process and the status of each section. The panel allows users to quickly navigate across sections.

• The "Modify" button uses pop-up screens that appear faster and, when closed, retain the user's place in the system. Once the user closes the modal, they can resume their previous work.

• Error messages are displayed immediately when the user exits a field.

First Name *	Last Name *
Justin	Elfrey
Middle Name	Suffix (Jr., Sr., etc.)
Business Information	
Practice Name	
Email Address *	
email@email.com	
Enter an email address in the format: name@example.com Country*	
Enter an email address in the format: name@example.com Country* United States	\$
Enter an email address in the format: name@example.com Country* United States Practice Business Address, Line 1*	:
Enter an email address in the format: name@example.com Country* United States Practice Business Address, Line 1* 12 East St	\$
Enter an email address in the format: name@example.com Country * United States Practice Business Address, Line 1 * 12 East St	\$
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Enter an email address in the format: name@example.com Country * United States  Practice Business Address, Line 1  I2 East St  Practice Business Address, Line 2  Practice Business Address, Line 2  City * Baltimore Zip Code * Zip Extension	C State* Maryland Dusiness Telephone Number*

## **Display Enhancements**

#### **New Look and Feel**

- OPS 2.0 features multiple enhancements to the look and feel of the system pages, ease of navigation and workflow of various user tasks.
- New Look and Feel : The new system comes with a fresh modernized look and feel including updated color schemes and screen design.

- Enhanced Message Display and Help Text
  - OPS 2.0 provides collapsible help text to optimize screen space and allow users to access help contents without interrupting the task workflows.
  - OPS 2.0 displays system messages (like confirmation or error notifications) with colored banners to differentiate system messages from help text.

#### **Improved System Navigation**

OPS 2.0 introduces drop-down task menus. These menus display options and brief descriptions of available tasks. This improvement allows users to navigate more efficiently with fewer clicks.

- The new homepage design includes visual elements that enhance the readability of the text and declutter the page, making it easier for users to find the information they need. The new prominent announcement banners are there to draw attention to important updates.
- The user-specific information, link to navigate to IDM, and switch user type functionality have been moved to a drop-down menu under the user avatar.



## **Performance Enhancements**

#### **Performance Enhancements**

OPS 2.0 performance gains compared to OPS 1.0:

- Performance more consistent with no bottlenecks for bulk file uploads.
- Faster file and record processing times.
- Improves durability for file and payment processing.
- Maintains high levels of reliability and responsiveness under normal operating conditions.

# Reporting Entities: Submissions and Attestation Enhancements

#### Reporting Entities: Submission and Attestation Enhancements

The most significant change for reporting entities is the introduction of a more efficient Submissions menu, replacing the previous Submissions home page. This new navigation system is designed to enhance the user experience, allowing users to navigate quicker and with fewer clicks.

The Submissions menu is organized according to the users' roles, which reduces the amount of scrolling required. The left side of the menu provides options used exclusively by those with the submitter role. The right side displays options available to all user roles.

There is also a menu option for utilities where users can find and launch the Covered Recipient Validation Tool. All necessary resources, like the Validated Physician Lists (VPL) and Validated Non-Physician Lists (VNPL), are located on the screen associated with the appropriate task.



#### Reporting Entities: Submissions-and Attestation Enhancements

#### **Manual Data Submissions**

- The Manual Data Submission process launches directly from the Submissions menu. OPS 2.0 did not alter the manual data entry process used in 1.0, but implemented several improvements:
  - The payment navigation bar displays the status of each manual submission process step.
  - Tax Identification Number (TIN) search: There is a new TIN search for Teaching Hospital covered recipients. Selecting a valid TIN automatically populates the hospital's information.
  - National Provider Identifier (NPI) search: there is a new NPI search for Physician/Non-Physician Practitioners being entered for the covered recipient or as research payment principal investigators. Selecting a valid NPI populates the covered recipient or principal investigator information required for matching. This includes the first and last name and license information.
  - Drug and device ID fields are dynamic in nature based on the section type.

Add General Payment	:				
Ø	•		•	•	•
Covered Recipient Demographics Informatio	n Products		Payments	General Record Information	Review & Save
Payments					
General Payment or Other Tr	ansfer of Value Information				
Enter the required payment or transfer of va	Ilue information. A field with an asterisk (*)	is required.			
Total Amount of Payment *	Date of Payment *	Number	of Payment Included in Total A	Amount *	
	mm/dd/yyyy or mm-dd-yyyy				]
Form of Payment or Transfer of Value *	mm/dd/yyyy or mm-dd-yyyy	□ Nature of	Payment or Transfer of Value	•	]
Form of Payment or Transfer of Value * Select	mm/dd/yyyy or mm-dd-yyyy	Nature of	Payment or Transfer of Value	••	]
Form of Payment or Transfer of Value *	mm/dd/yyyy or mm-dd-yyyy	Nature of	Payment or Transfer of Value	•	]

### Reporting Entities: Submission and Attestation Enhancements

#### **Bulk File Upload**

- The bulk file upload screen in OPS 2.0 is also launched directly from the Submissions menu and follows the same process as OPS 1.0.
- The uploaded bulk file goes through the same validation and matching processes. Users can download the error log from the 'Review Submitted File Status' pop-up screen if the file contains errors. OPS 2.0 error logs contain the Error Code and Description of the Errors.

## **Search and View Records**

- The search filter criteria and search results are located a single page.
- This eliminates the need for the user to select the back button and navigate to a different screen to change the search criteria for a different entity category or entity.

wment Details Advanced	Search Criteria								
ginene beans na vancea									
ecord Status		File ID			Reco	rd ID		Home System Payn	ment ID
Select	:	This is a 3	8-digit number		This	i is a 38-digit number			
ason For Deletion									
Select							÷		
vered Recipient Type Physician	Non-Physic	ian Practitioner		eaching Hospital					
vsician First Name	2	Physician	ast Name		Addr	ess State		Zip Code	
		7			S	elect	¢		
ense State		License Nu	mber		Phys	ician NPI			
Select	:				This	i is a 10-digit number			
ching Hospital Name		Teaching H	ospital CCN 🚯		Teac	hing Hospital TIN			
		This is a 6	digit number		This	i is a 9-digit number			
rked for Deletion? Yes	Input Method Manual Ent	ry	Repo	ort Type Single	Reco	ord Warnings /es			
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						To change results, you c	an select different cri	teria and select "Search	h" again. Clear All Sear
arch Results									Download Search Result
lect an action for one o	more multiple records below:	Select	\$	Apply					
•									
To view, copy and	edit your record, click on Record	D link. Record(s)	with warnings ar	re flagged with a warning icon (	<b>)</b> )				
■ File t Re ID t ID	cord	ayment ‡	Amount (\$)	Recipient Type	\$	Recipient	Record Status	Arked for Deletion	Carter Reason for Deletion
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U <u>177111</u> <u>10</u>	valid error hop		\$1,050.00	covered keepiene reaching	ing Hospital	The Johns Hopkins Hospital	Falled validation		

## **Display Record ID Details**

- OPS 2.0 uses popup modals to display the record ID details. It displays the modal on the right half of the screen once users select the record ID hyperlink.
   Since they still have access to the search results, users can quickly select another record ID hyperlink, and the modal refreshes with the new record details.
- OPS 2.0 relocates the copy and edit action buttons from the results grid to the top of the record ID popup modal.
- OPS 2.0 relocates the delete, cancel deletion, return to attester, and return to the submitter in a drop-down component to minimize clutter on the page.

Adva	nced	Search	Filters			Record ID: 1061075035		×	
Payment	Details Adv	anced Search C	riteria					Edit Copy	
						Record Details			
Soard	Boculto					Program Year		2023	
Searci	Results					Entity Submitting Payment		CSJ Pharma	
Select a	n action for	one or more m	ultiple records below:	select	C Apply	Payment Category		General Payments	
	To view, cor	w and edit your	record, click on Record ID link	Record(s) with v	varnings are flagged with a warning icon (	Consolidated Reporting	No		
Ť		,,,,				Home System Payment ID	Testing edit payment		
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	<u>177111</u>	<u>1061077275</u>	Context TH blank	\$548.00	Covered Recipient Teaching Hospital	Last Modified Date		06/11/2024	
	<u>177111</u>	<u>1061077273</u>	Valid error nop	\$1,050.00	Covered Recipient Teaching Hospital	Last Modified By		Thomas Cibull	
	<u>177111</u>	<u>1061077271</u>	Valid error products	\$548.00	Covered Recipient Teaching Hospital	Submission Date		06/11/2024	
	N/A	1061075037	Testing copy payment	\$250.00	Teaching Hospital	Submitted By	Thomas Cibull		
	N/A	1061075035	Testing edit payment	\$250.00	Teaching Hospital	Record Status	Ready for Attestation		
						Marked for Deletion	No		
Chand					C Provinus	Associated Disputes and Statuses		No	
Showir		of 5 entri	es		< Previous	Late Payment Indicator		Yes	
Return	to top					Recipient Demographic Information			
						Covered Recipient Type	Teaching Hospita	ıl	
OPEN D	ATA TOOLS		ADDITIONAL RESOURCES			Teaching Hospital Name	Riverside Region	al Medical Center	
Data.CM	<u>IS.gov</u>	CMS gov	CMS contact info	FAQs	nolicy	Teaching Hospital Tax Payer ID Number(TIN)	521245746		
Data.M	dicaid.gov	<u></u>	Help with file formats & plug	ins	protect.	Recipient Business Street Address, Line 1	500 J Clyde Morr	is Blvd	
Data.He	althcare.gov					Recipient Business Street Address, Line 2			
11	OPE	N				Recipient City	Newport News		
	PAYN	AENTS"		Unaut	horized use of the application is strict	Recipient State	Virginia		
						Recipient Zip Code	23601		

## **Download Zip Files**

In OPS 2.0, the system allows users to download the first 200,000 records with a warning message within the file instructing the user that their file only contains a portion of their search results and that they will need to refine their search parameters so that the number of the results is below 200,000.

dvan	lvanced Search Filters											
Paymer	nt Details	Advanced Se	arch Criteria						+			
Search	Results						Please note ti	hat vou can downloa	Download Search Results (.zip) and a maximum of 200,000 records			
<b>6</b> .1				Select	^ Apply		in de la State Contraction de la contraction					
Select a	n action for	one or more mu	Iltiple records below:	Select	~ Арріу							
0	To view, cop	by and edit your r	ecord, click on Record ID liv	nk. Record(s) with wa	arnings are flagged	with a warning icon (🔺)						
•	File ID ‡	Record ID	Home System Payment ID	Amount (\$) 🛟	Recipient Type	Recipient 🗘	Record Status	Marked for Deletion	Reason for Deletion \$			
	<u>176857</u>	<u>1061302366</u>	OPS5297_Testing 1	\$1,000.00	Physician	Recipient	Failed Validation	No				
	176857	1061302364	OPS5297_Testing 1	\$1,000.00	Physician	Recipient	Failed Validation	No				
	N/A	<u>1061302363</u>		\$5,000.00	Physician	Recipient	Failed Matching	No				
	N/A	<u>1061301050</u>		\$564,654,654.00	Physician	Recipient	Attested	No				
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Showin	g All \$	of 5 entrie	25		< Previous 1	Next >						

30

### Final Submission, Attestation, Renew Delay in Publication Workflow

 OPS 2.0 provides a modernized design using popup confirmation modals for processes such as deleting records, performing final and submissions.

<text><text><text><section-header><section-header><section-header>Are you sure you want to delete the selected record(s)? Note that deleting records with attested status requires agreement and re attestation by the reporting entities attester. Attested records will not be deleted from the open payment system until re-attestation takes place. Close Delete Comfirm Final Subbmission Confirm the final submission for this data category. Confirm the final submission for this data category. 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, the covered record that has undergone final submission, you must delete the original record and submit a new record with updated covered recipient identifying information in the 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 that record that has undergone final submission, the covered record with updated covered recipient identifying information in a record with updated covered recipient identifying information.</section-header></section-header></section-header></text></text></text>	Confirm Deletion	>
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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.	omission for this data category.	
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Special Meds - 2023 General Payments	023 General Payments	
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### Renew Delay in Publication, Final Submission, Attestation Workflow

OPS 2.0 provides a modernized design using popup confirmation modals for processes such as deleting records, performing final submissions, renewing a delay in publication, and attestation.

During the Attestation process, a navigation bar displays users' status and progression horizontally.

The navigation depicts the status of the process step, i.e., complete or contains errors, and allows the user to move forward or backward in the process.



# Reporting Entities Review and Dispute Enhancements

### Review and Dispute Enhancements for Reporting Entities

OPS 2.0 uses popup modals to display the record ID details. Once users select the record ID hyperlink, the modal displays on the right half of the screen. Since they still have access to the search results, they can quickly select another record ID hyperlink to refresh the modal with new record details.

- OPS 2.0 disables the Download Disputes Zip File for users without disputes.
- The 'Edit' and 'Copy' buttons are available from within the record ID popup modal.
- All disputes are formatted in a table for quick navigation and selection, easy to read record details, and sort and filter functions.

Showing	Results for																
Show Progra	Show Disputes for: Special Meds Program Year: 2023																
Ackn	owledge Dispu	te	Resolved No	o Cha	ange								 E	dit Record	Delet	e Selected Ca	ncel Deletion
ſ	Select one or multiple records below for Acknowledge Dispute, Resolved No Change, Delete Selected and Cancel Deletion actions. Select a single record for Edit Record action. Review and Dispute actions are only applicable for records that are in open Program Years in the appropriate status. If any actions are needed for records in closed Program Years, please contact the Open Payments Help Desk Support at <u>openpayments@cms.hhs.gov</u> or 1-855-326-8366 (TTY Line: 1-844-649-2766).																
•	Record ID	\$	Dispute ID		Recipient	\$	Payment Category	\$	Program Year	\$	Total Payment Amount/Dollar Amount Invested	\$ Dispute Status	\$ Date Dispute	Marked fo Deletion	<sup>or</sup> ≎	Reason for Deletion	Dispute History
	<u>10612999</u>	11	157375		Stephen Ramor	ndino	General Paymen	nts	2023		\$5,000.00	Initiated	07/09/2024	No			View
Showi	ng 🛛 All 💲	•	f 1 entries							< Pr	revious 1 Next >						

### Review and Dispute Enhancements for Reporting Entities

#### Acknowledge Dispute

Reporting Entity Processes during Review and Dispute:

In OPS 2.0,
 processes such as
 Acknowledge
 Dispute, Resolved
 No Change, Delete
 Record, and
 Cancel Deletion
 use popup modals
 rather than having
 users navigate to
 new pages.

#### Special Meds - 2023

Select the "Acknowledge" button to acknowledge the dispute records initiated by the physician, non-physician practitioner, or teaching hospital. Once the dispute is acknowledged, the Review and Dispute status for the records will be displayed as "Acknowledged". If any of the selected Review and Dispute record statuses do not equal "Initiated", or are in closed Program Years, then those records have been omitted from the "Acknowledge the following disputes" table and acknowledgement process.

X

For more information about the review and dispute process, refer to the Open Payments User Guide [PDF].

#### Acknowledge the following disputes:

Dispute ID	Record ID	Date of Payment	Amount(\$)	Covered Recipient	Dispute Status	Date Dispute Initiated
157375	1061299911	12/15/2023	\$5,000.00	Stephen Ramondino	Initiated	07/09/2024
Cancel			. ,			Acknowledge

Importa	nt Informatio	า				4
Resolve the	following disp	utes with no ch	ange(s) to data	:		
Dispute ID	Record ID	Date of Payment	Amount(\$)	Covered Recipient	Dispute Status	Date Dispute Initiated
157375	1061299911	12/15/2023	\$5,000.00	Stephen Ramondino	Initiated	07/09/2024
≀eason for	dispute resolut	ion with no cha	ange(s) to data	*		

## Covered Recipients Review and Dispute Enhancements

### Review and Dispute Enhancements for Covered Recipients

Covered Recipient Search:

OPS 2.0 improves the covered recipient "record search" and "view disputed records" to enable the users to view more data

- Dropdown field provide a precise display,
- Once users review the text in the field, they can collapse the field to view the results of the covered recipient records.

Important Information					+
Covered Recipient Records					
Program Year		Entity Making Payment		Dispute Status	
2023	0	Select 0	;	Select	0
Record ID Listed as PI Only? Ves No		Dispute ID		Payment Category         General Payments         Research Payments         Ownership or Investment Interest	Affirmed? Ves No
					Clear All Search
Available for Review & Dispute Deleted & In Progress Records					
nowing Results for					Download Zip F
Program Year: 2023					

### Review and Dispute Enhancements for Covered Recipients (contd.)

Covered Recipient Search and View Records:

OPS 2.0 enhances the Covered Recipient Review and Dispute records results by displaying the results in a table view.

- The table view allows the user to see many more records and all of the information listed above at a glance. The display is in a table format, allowing the user to sort by any column of data.
- The dispute and record details are displayed in faster popup modals that enable users to quickly open and close them.
- Once the popup modal is displayed, users can expand the dispute information to minimize scrolling and allow the user to focus on reading the information within the modal.

OPEN PAYMENTS			Home Review and Dispute	Messages 🗸 Contact Us Resources
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Covered Recipient Records				
Program Year	Entity Making Payment		Dispute Status	
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Record ID	Dispute ID		Payment Category General Payments Research Payments	Affirmed? Yes No
Listed as PI Only? Ves No			Ownership or Investment Interest	
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Available for Review & Dispute     Deleted & In Progress Records				
Showing Results for				Download Zip File
Program Year: 2023				

### Affirm, Dispute and Withdraw Disputes Workflow

OPS 2.0 provides enhancements to the covered recipients Affirm Records, Dispute, and Withdraw Disputes, workflow process.

- OPS 2.0 displays popup modals for users to enter dispute information. After submitting a dispute, users will see a confirmation banner. Once the user clears the confirmation banner, their page returns to the same spot within the system.
- The "affirm" process allows the user to select multiple records to "affirm" at one time. Records that are not eligible to be affirmed include those already affirmed or those that have an open dispute. As a reminder, if you no longer wish to dispute a record and affirm instead, withdraw the dispute.



## **Next Steps and Available Resources**

## **Next Steps for Reporting Entities**

New or Returning?	Next Steps
New Reporting Entities	<ul> <li>Register in IDM and request access to the Open Payments system</li> </ul>
	<ul> <li>Register self and reporting entity (if applicable) in the Open Payments system</li> </ul>
	Assign user roles
Returning Reporting Entities	<ul> <li>Ensure IDM account has not been deprovisioned due to inactivity and reset password if necessary</li> </ul>
	<ul> <li>Recertify reporting entity information and provide required review and dispute contact information</li> </ul>
	Confirm user roles

Note: See the "Registration" tutorials, or the Open Payments User Guides for the new registration enhancements and walk-throughs.

## **Next Steps for Covered Recipients**

New or Returning?	Next Steps
New Physicians, Non-Physician Practitioners and Teaching Hospitals	<ul> <li>Register in IDM and request access to the Open Payments system</li> <li>Register self and teaching hospital (if applicable) in the Open Payments system</li> </ul>
Returning Physicians, Non- Physician Practitioners and Teaching Hospitals	<ul> <li>Ensure IDM account has not been deprovisioned due to inactivity and reset password if necessary</li> <li>No other action is required at this time</li> </ul>

Note: See the "Registration" tutorials, or the Open Payments User Guides for the new registration enhancements and walk-throughs.

## **Available Resources**

- Review available resources on the Resources page of the CMS Open Payments website at <u>https://www.cms.gov/OpenPayments/Resources</u>
  - Open Payments User Guide for Reporting Entities
  - Open Payments User Guide for Covered Recipients
  - Tutorials
- Register for CMS email notifications via the Open Payments website to receive email updates about Open Payments
- For additional questions, contact the Open Payments Help Desk:
  - Email: <u>openpayments@cms.hhs.gov</u>
  - Phone: 1-855-326-8366 or for TTY line call 1-844-649-2766

## Disclosure

- **Disclaimer:** The contents of this document do not have the force and effect of law and are not meant to bind the public in any way, unless specifically incorporated into a contract. This document is intended only to provide clarity to the public regarding existing requirements under the law.
- Activities/persons addressed by this document: Guidance for Reporting Entities and Covered Recipient on overview of the Open Payments system and enhancements.
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