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User Guide for

Covered Recipients

OPEN PAYMENTS

CREATING PUBLIC TRANSPARENCY INTO INDUSTRY-PHYSICIAN FINANCIAL RELATIONSHIPS

January, 2024

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



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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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INTRODUCTION

Purpose of the Open Payments User Guide

This Open Payments User Guide includes definitions, descriptions, screenshots, tools, and tips designed to help <u>physicians</u>, <u>non-physician practitioners (NPPs)</u>, and <u>teaching hospitals</u> better understand how to comply with Open Payments (the Sunshine Act).

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
- Physician, NPPs, and Teaching Hospital Registration
- Review and Dispute
- Additional Information and Resources

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 |
| 11.0 | January 2017 | Update | Updated to reflect changes to registration and data submission |
| 12.0 | June 2017 | Update | Updated publication chapter, removed outdated information |
| 13.0 | September 2017 | Update | Updated to reflect system updates |
| 14.0 | January 2018 | Update | Updated to reflect system updates |
| 15.0 | March 2018 | Update | Updated to reflect system updates for Review and Dispute |
| 16.0 | January 2019 | Update | Updated to reflect system updates |
| 17.0 | September 2019 | Update | Updated to reflect system updates |
| 18.0 | January 2020 | Update | Updated to reflect system updates |
| 19.0 | January 2021 | Update | Updated to reflect system updates |
| 20.0 | February 2021 | Update | Updated to reflect EIDM to IDM Migration changes |
| 21.0 | July 2021 | Update | Updated to reflect system updates |
| 22.0 | September 2021 | Update | Updated to reflect system updates |
| 23.0 | January 2022 | Update | Updated to reflect system updates |
| 24.0 | September 2022 | Update | Updated to reflect system updates |
| 25.0 | January 2023 | Update | Updated to reflect system updates |
| 25.1 | April 2023 | Update | Updated to reflect new IDM password requirements |

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, <u>non-physician practitioners (NPP)</u> and <u>teaching hospitals</u>, 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 <u>covered recipients</u>, <u>physician owners or investors</u>, 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 <u>applicable manufacturers</u> and <u>applicable group</u> <u>purchasing organizations (GPOs)</u>, as well as reporting payments or other transfers of value made by these applicable manufacturers and applicable GPOs to these physicians.

As of January 2022, the Open Payments System is updated per section 403.902 of the Affordable Care Act to include the NPPs as covered recipients in the Open Payments System. Per the final rule, the updated definition of covered recipient means— (1) Any physician, physician assistant, nurse practitioner, clinical nurse specialist, certified registered nurse anesthetist, or certified nurse-midwife who is not a bona fide employee of the applicable manufacturer that is reporting the payment; or (2) A teaching hospital, which is any institution that received a payment under 1886(d)(5)(B), 1886(h), or 1886(s) of the Act during the last calendar year for which such information is available.

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, NPPs, and teaching hospitals) on a publicly accessible website. This publicly 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, NPPs, 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 the development of inappropriate relationships.

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 <u>common ownership</u> with applicable manufacturers who also provide <u>assistance and support</u>, are required to annually report to CMS:

- Payments or other transfers of value, including general and research, made to physicians, NPPs, 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, including general and research, 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, NPPs, 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 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 are required to **collect data** documenting their financial relationships with certain physicians, NPPs, 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 2016 took place in February and March of 2017.

The review and dispute period occurs after the submission period ends and extends for at least 45 days. During this period, physicians, NPPs, 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 for an additional fifteen-day correction period. Review, dispute, and correction activities can occur until the end of the calendar year that the record was submitted, though the initial publication of the program year data will reflect the state of the record as of the end of the correction period. Disputes initiated after the review and dispute period, or corrections made after the end of the correction period will be reflected in later publications. For details refer to the "Methodology and Data Dictionary Document" available on the Resources page of the Open Payments website, at https://www.cms.gov/OpenPayments/Resources.

Data publication occurs twice per year, with a June publication and an early year publication.

• June Publication - Initial Publication

- The first publication of the eligible records submitted and attested on or before the submission closing date of 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 payment records at the end of the correction period of the latest program year.

• Early Year Publication - Refresh Publication

- o Publishes updates to the data made since the Initial Publication.
- The second publication of eligible records submitted and attested on or before the submission closing date of the latest program year.
- Contains updates made to records after the correction period of the latest program year and before the end of the calendar year (or before the modified-without-dispute cutoff date in November for records not under dispute).
- o The data published is the latest attested version of the data at the end of the calendar year.

For example, the June 30, 2022 data publication included the initial publication of Program Year 2021 data and republication of prior program years. The early 2023 data publication included the refresh publication of Program Year 2022 data and republication of prior program years.

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, which is the year the reported payments or other transfers of value were made.

Figure 1: Key Dates for the Open Payments Program Year

| Program Activities | Program Timeline |
|--|--|
| Industry collects data | January 1-December 31 of program year |
| Industry submits and attests to data in the Open Payments system | February-March of the calendar year after the program year |
| Physicians, NPPs, and teaching hospitals review the reported data and dispute any data they believe is inaccurate; industry makes corrections to the data (reflected in the initial publication) | Review, Dispute, and Correction period: April-May |
| Initial program year initial data publication Prior program year data refresh publication | On or by June 30 |
| Physicians, NPPs, and teaching hospitals continue to review and dispute data; industry continues to make corrections to the data (reflected in the data refresh publication) | June – December 31 |
| Open Payments data refresh | Early in the following year |

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, NPPs, 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:

- <u>Step 1:</u> Determine if the entity <u>operates in the United States</u> (including any territory, possession, or commonwealth of the United States). See the reference guide in **Figure 2.**
- <u>Step 2:</u> Determine if the entity engages in <u>activities</u> of Type 1 or Type 2 applicable manufacturer. See the reference guide in **Figure 2.**
- <u>Step 3:</u> Determine if the entity's products are covered drugs, devices, biologicals, or medical supplies, or <u>covered products</u>. See the reference guide in **Figure 2.**
- Step 4: If the entity possesses the characteristics illustrated in Figure 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.

- <u>Step 5:</u> Determine if the entity <u>operates in the United States</u> (includes any territory, possession, or commonwealth of the United States). See the reference guide in **Figure 3.**
- <u>Step 6:</u> Determine if the entity engages in <u>activities</u> of an applicable GPO. See the reference guide in **Figure 3.**
- <u>Step 7:</u> Determine if the entity's products are covered drugs, devices, biologicals, or medical supplies, or <u>covered products.</u> See the reference guide in **Figure 3.**
- Step 8: [OB] if the entity possesses the characteristics illustrated in Figure 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 3**, the entity is not determined to be an applicable GPO in Open Payments.

Figure 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 2** also outlines the characteristics of two types of applicable manufacturers.

Figure 2: Determining if an Entity Is an Applicable Manufacturer

| Characteristic | Type 1 Manufacturer IF | Type 2 Manufacturer IF |
|----------------|--|--|
| Operate in US? | 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. | Same as Type 1 Manufacturer. |
| Activities | 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. | 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. |

| Characteristic | Type 1 Manufacturer IF | Type 2 Manufacturer IF |
|---------------------|---|------------------------------|
| | Reimbursed by Medicare, Medicaid, or Children's Health Insurance Program AND | Same as Type 1 Manufacturer. |
| Covered Products | 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 Food and Drug Administration (FDA). | |

Figure 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 3** also outlines the characteristics of applicable GPOs.

Figure 3: Determining if an Entity Is an Applicable GPO

| Characteristic | Group Purchasing Organization IF |
|------------------|---|
| Operate in US? | 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 | 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 | 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 any physician, physician assistant, nurse practitioner, clinical nurse specialist, certified registered nurse anesthetist, or certified nurse-midwife who is not a bona fide employee of the applicable manufacturer that is reporting the payment, and teaching hospitals.

For the purposes of Open Payments, physicians are defined as legally authorized to practice by their state as follows:

- 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
- Chiropractors

For the purposes of Open Payments, NPPs are defined as legally authorized to practice by their state as follows:

- Physician Assistant
- Nurse Practitioner
- Clinical Nurse Specialist
- Certified Registered Nurse Anesthetist
- Certified Nurse-Midwife
- Anesthesiologist Assistant

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.

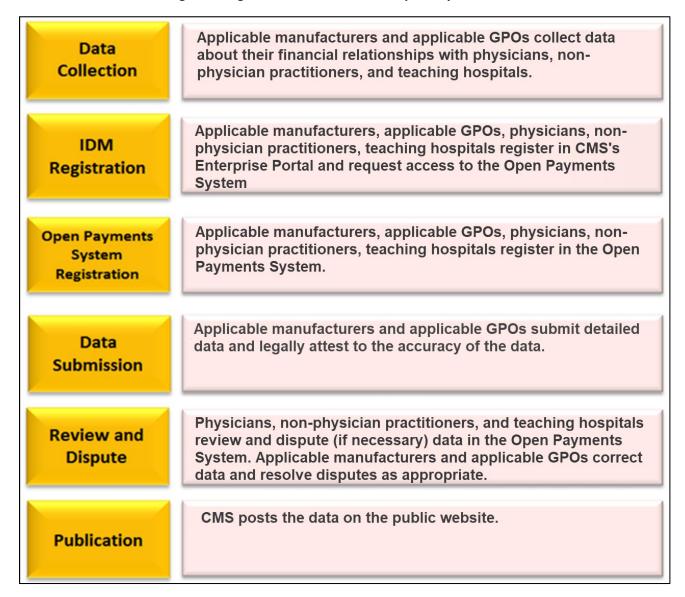
Additionally, applicable manufacturers and applicable GPOs are required to report ownership or investment interests in the entity held by a physician (referred to as a physician owner or investor) or the physician's immediate family members, and report payments or other transfers of value to these physicians 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) stepparent, 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 several functions based on their role.

Applicable manufacturers, applicable GPOs, physicians, NPPs, and teaching hospitals who participate in the Open Payments program must register in the Open Payments system. **Figure 4** provides a high-level process flow.

Figure 4: High-Level Process Flow for Open Payments



1.4a: Open Payments Browser Requirements

The Open Payments system is a web-based application and can be run on one of the listed browsers below:

- Google Chrome (Version 89 or higher),
- Microsoft Edge (Version 89 or higher),
- Safari (Version 13.1.2), and
- Mozilla Firefox (Version 83 or higher) browsers.

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: Create a profile in the system, submit data into the system, verify the data, and attest to the accuracy of the data.
- For physicians/NPPs/teaching hospitals: Create a profile, 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", "Cancel" or "Continue" buttons) 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 with 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 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 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 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. Many pages on 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. |
| Н | 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 several 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

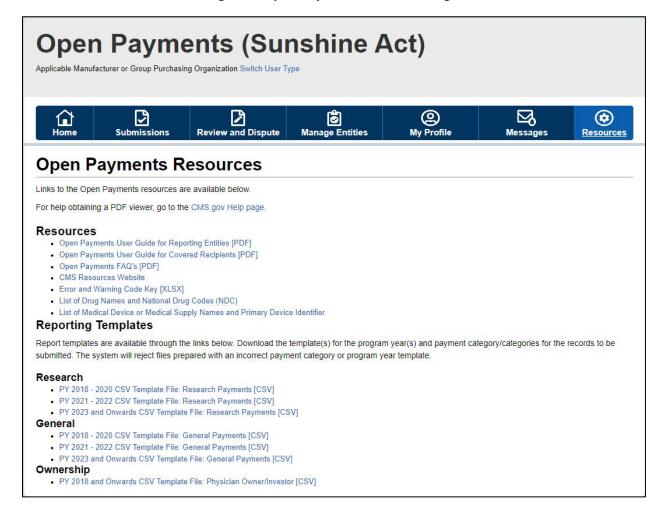
The Open Payments website at https://www.cms.gov/openpayments is your primary resource for information about Open Payments. This website contains numerous resources aimed at preparing and informing users about Open Payments regulations as well as the system. Check this website often for updated tools,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

1.5b: Open Payments Resources

CMS has developed many resources to help applicable manufacturers, applicable GPOs, physicians, NPPs, 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 https://www.cms.gov/OpenPayments/Resources.

Covered recipients can also access the Open Payments User Guide for Covered Recipients, the Open Payments FAQ's and other useful resources within the Open Payments system on the "Resources" tab.

Figure 6: Open Payments Resources Page



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. For the TTY line, call 1-844-649-2766. The Help Desk's hours of operation are posted on the Open Payments website.

1.5d: Open Payments Mailing List

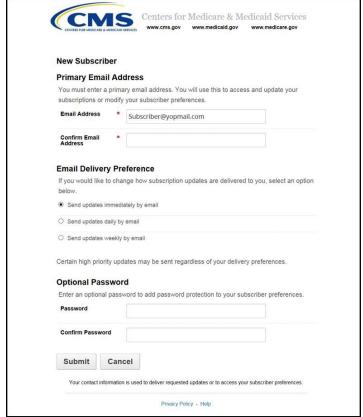
By registering for the Open Payments mailing list, you will be signed up to receive periodic email notifications regarding program, system, and resource updates. This is a good way to keep informed on any updates, changes, or important messages from CMS. To sign up for the Open Payments mailing list,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

Figure 7: Receive Email Updates



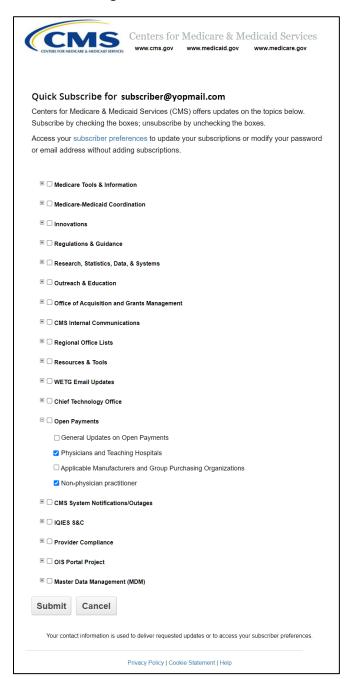
Entering your email address will take you to a page where you can select which mailing list you want to subscribe to.

Figure 8: CMS New Subscriber Screen



Under the Section "Open Payments," 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", "Non-physician practitioner", or "Applicable Manufacturers and Group Purchasing Organizations". Make sure you also select the general updates box to ensure you receive all appropriate email updates.

Figure 9: Quick Subscribe



Reporting and Data Collection

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 values (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." Due to changes in record formats, there are three versions of the Submission Data Mapping document, one for Program Years "2018-2020", one for Program Years 2021-2022, one for Program Years "2023 and Onwards". The three documents are available on the Resources page of the Open Payments website at https://www.cms.gov/OpenPayments/Resources. These documents provide specific, detailed descriptions of the information that must be collected by reporting entities to document general, research, 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, NPPs, and teaching hospitals are captured during data collection; these categories are shown in the bulleted list below.

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.

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

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 <u>research payments</u> made by applicable manufacturers and applicable GPOs to covered recipient physicians, NPPs, and teaching hospitals are captured during data collection; these categories are shown in the bulleted list below.

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.

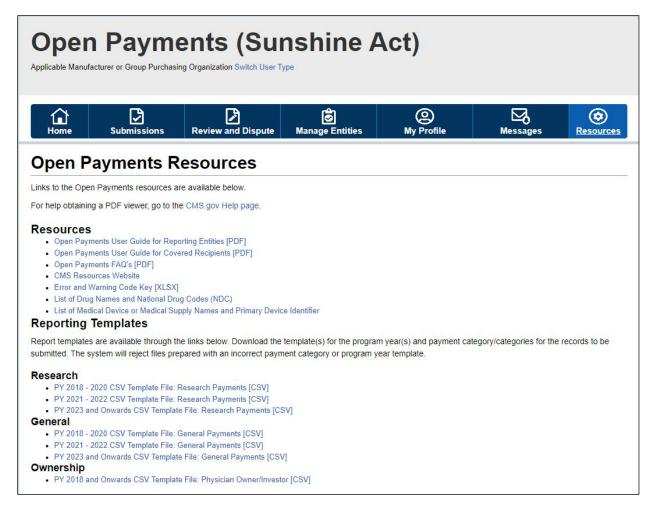
Payment or Other Transfers of Value Information specifies information regarding the research payment or other transfers of value.

Research-related Information captures specific information about payments or other transfers of value for research activities.

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

Users who hold a submitter role can access submission templates within the Open Payments system on the "Resources" tab.

Figure 10: Open Payments System "Resources" Tab for Submitters



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 are captured during data collection; these categories are shown in the bulleted list below.

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.

On the Resources page of the Open Payments website https://www.cms.gov/OpenPayments/Resources, users can find the CSV sample files that show how the data elements listed below will be reported to the Open Payments system.

Registration

Chapter 3: Physician, NPP, and Teaching Hospital Registration

This chapter provides information for physician, NPP, and teaching hospital registration in CMS's Identity Management system (IDM) and creation of a profile in the Open Payments system. Both activities are required to obtain access to the Open Payments system. All physicians, NPPs, and teaching hospitals who wish to view data reported about them must complete both activities 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 IDM, as well as user registration in the Open Payments system.

IDM Registration provides an overview of the first step in registration, how to register for IDM and request access to the Open Payments system.

Profile creation in the Open Payments System provides walkthroughs of various scenarios for registering a physician, an NPP, 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 contain information on how to nominate other individuals for roles associated with physicians, NPPs, and teaching hospitals.

Updating Profile Information in the Open Payments System contains information on how physicians, NPPs, their authorized representatives, and users affiliated with teaching hospitals can update their profiles in the Open Payments system.

Section 3.1: Two-Step Registration Process

Physicians, NPPs, and teaching hospitals must register in the Open Payments system to view, review, and/or dispute data submitted about them.

Note: Physicians, NPPs, and teaching hospitals are not required to participate, but are encouraged to do so to view information reported about them prior to CMS's publication of the data, as well as ensuring accuracy of the data.

Registration for Open Payments is a two-step process. First, users must register in IDM to obtain IDM credentials and request access to the Open Payments system. Once the user has obtained IDM credentials, he or she will be able to register in the Open Payments system.

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

Identity Management (IDM) is an identity management and services system that (1) serves as an identity proofing tool to verify a person's identity; and (2) provides you with access to various CMS applications. Registering in IDM provides you with log in credentials **required** for access to the Open Payments system. You will be able to set up your own log in credentials in the form of a user ID and password during the IDM registration process. IDM credentials allows you 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, IDM can be accessed via the CMS Enterprise Portal at https://portal.cms.gov. A list of IDM FAQs is available on the CMS website at https://www.cms.gov, and information about IDM registration can be found on the Resources page of the Open Payments website at https://www.cms.gov/OpenPayments/Resources. If you already have IDM credentials, you can move ahead to section 3.3, Registering in the Open Payments System.

IDM 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 the account, enter the user ID and correctly answer all challenge questions. Then enter a new password in the input fields of "New Password" and "Confirm New Password". If the account does not reactivate, contact the Open Payments Help Desk at 1-855-326-8366. For the TTY line, call 1-844-649-2766.

IDM will automatically deactivate your account if you have not logged in for 180 days or more. If your account has been deactivated, you will not be able to access CMS applications, including the Open Payments system. If your account is deactivated due to inactivity, you can contact the Open Payments Help Desk at 1-855-326-8366 to reinstate the account. For the TTY line, call 1-844-649-2766.

IDM will automatically remove your account if you have not logged in for two years or more. Once removed, the account cannot be reactivated again, and you will be required to set up a new account using steps in Section 3.2b through 3.2d, followed by steps in Section 3.4.

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 1-855-326-8366 for assistance with this manual proofing process.

3.2a: System Requirements

CMS screens are designed to be viewed at a minimum screen resolution of 1024×768 . For optimal performance, screen resolution should be set to 1920×1080 . The following additional considerations optimize access to the CMS Enterprise Portal:

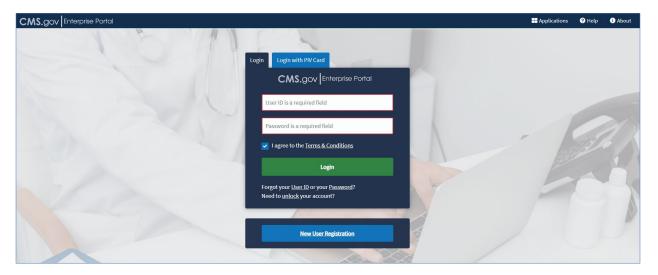
- Disable pop-up blockers prior to accessing CMS Enterprise Portal.
- Use one of the following browsers with JavaScript enabled:
 - o Microsoft Edge
 - Chrome (recommended for optimal performance)
 - Firefox
 - Safari

3.2b: IDM New User Registration

Go to the CMS Enterprise Portal page at https://portal.cms.gov. The system displays the CMS Enterprise Portal public landing page.

<u>Step 1</u>: On the CMS Enterprise Portal page, select **New User Registration** to continue.

Figure 11: CMS Enterprise Portal Public Landing Page



<u>Step 2</u>: On the "Select Your Application" page, select "Open Payments" from the drop-down list and agree to the Terms and Conditions of the CMS Enterprise Portal page, then select **Next** to continue.

Step #1: Select Your Application

Step 1 of 3 - Select your application from the dropdown. You will then need to agree to the terms & conditions.

Select Your Application

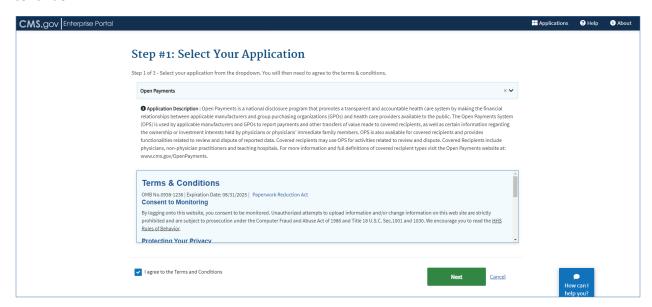
Novitasphere
One Program Integrity System (OnePi)
OneMAC

Open Payments

PARHM Dashboard
Payment Recovery Information System (PRIS) - RAC & RADV Appeals

Figure 12: Select Your Application

<u>Step 3</u>: Accept the Terms and Conditions of the CMS Enterprise Portal page and then select **Next** to continue.



Two Terms and Conditions sections of particular importance to read are:

- Consent to monitoring; and
- Collection of Personal Identifiable Information (PII).

"Consent to monitoring" means that you agree to allow CMS to monitor your activity and actions performed through CMS applications while logged into the CMS Enterprise Portal and accessed through IDM.

"PII" is information that someone can use to uniquely identify, contact, or locate a single person, or use with other sources to uniquely identify a single individual. CMS applications collect personal information collected to use for the purpose of verifying your identity only.

<u>Step 4</u>: On the "Register Your Information" page, enter your personal user information. Be sure to enter all information in all required fields. **Note: Selecting Cancel causes you to lose all data entered.** Select **Next** when you have entered all the information.

Data fields to be completed are the following:

- Name (First, Middle, Last, Suffix)
- Date of Birth (Month, Date, Year)
- Is Your Address US Based (Yes/No)
- Home Address, City, State, Zip Code
- Email Address
- Confirm Email Address
- Phone Number

Enter your legal name, current home address, primary phone number, and email address correctly. IDM collects personal information only to verify your identity with Experian, an external identity verification provider (explained in the next section). If IDM does not validate this information successfully and identity proofing fails, contact the Open Payments Help Desk at 1-855-326-8366.

CMS.gov Enterprise Portal Step #2: Register Your Information Step 2 of 3 - Please enter your personal and contact information All fields are required unless marked (optional). Enter First Name Enter Middle Name (optional) Enter Last Name Suffix (optional) Select Birth Month Select Birth Date Is Your Home Address U.S. Based? Yes O No Enter Home Address Line 1 Enter Home Address 2 (optional) Enter City Enter ZIP Code Enter ZIP+4 Code (optional) Enter Email Address Confirm Email Address

Figure 13: Register Your Information Page

NOTE FOR INDIVIDUALS WITH FOREIGN ADDRESSES: Individuals with addresses outside of the United States can register in IDM via the online portal, but the Open Payments Help Desk must conduct identity proofing 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.

<u>Step 5</u>: On the "Create User ID, Password & Security Question/Answer" page, create an IDM username and password in accordance with the guidance provided below. You must select a security question and provide a security answer. Select **Next** when finished.

Note: Selecting Cancel causes you to lose all data entered.

Figure 14: Create User ID, Password & Security Question/Answer Page



- The CMS Portal User ID:
 - Must be between 6 74 characters and contain at least one letter;
 - Can contain alphanumeric characters;
 - Allowed special characters are limited to hyphens (-), underscores (_), apostrophes ('), and periods (.)
 - The @ symbol is allowed only if the User ID is in a valid email address format
 (<u>j.doe@abc.edu</u> or 123@abc.com)
 - Cannot contain eight (8) consecutive numbers;
 - Cannot begin or end with special characters;
 - Cannot contain more than one (1) consecutive special character;
- Password Requirements:
 - Password must be a minimum of 15 characters;

- Password must contain: one (1) upper case and one (1) lower case letter, and one (1) number;
- The following special characters may be used: "!#\$%&'()*+,-./\:;<=>?@[]^_`{ |}~
- Password cannot contain: Parts of User ID, First Name, Last Name, common passwords;
- Password can only be changed once every 24 hours;
- Password must be different from the last six (6) passwords;
- Password must not exceed 60 characters;
- Confirm password:
 - Confirm password;
 - Enter the same password;
- Select your security question:
 - Select a question from the drop-down list of questions;
- Security answer:
 - Can contain alphanumeric characters;
 - Can contain spaces;
 - Must be at least four (4) characters;
 - Cannot contain part of the security question;
 - Your security answer is required for you to reset your password or unlock your account

<u>Step 6</u>: On the "New User Registration Summary" page, review the information and make any necessary changes before submitting. Select **Submit User** to submit the information.

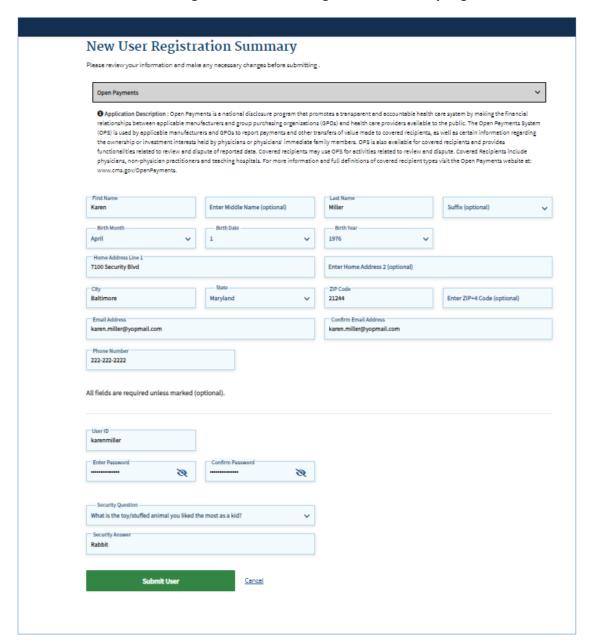


Figure 15: New User Registration Summary Page

<u>Step 7</u>: A "Confirmation" page displays acknowledging successful registration in IDM. Select the "CMS.gov Enterprise Portal" link (top left) or the "Login" link in the green window to go to the CMS Enterprise Portal home page. Note that profile configuration can take up to 24 hours. If you are unable to login after that timeframe, call the Open Payments Help Desk at 1-855-326-8366. For the TTY line, call 1-844-649-2766.

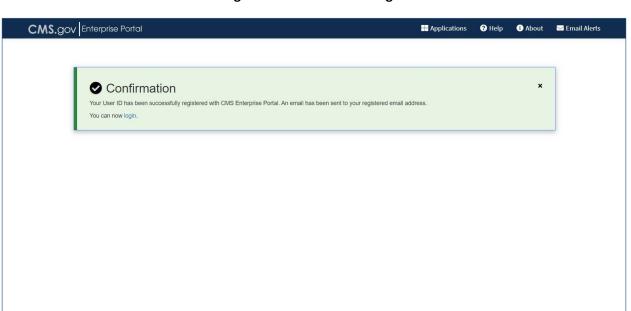


Figure 16: Confirmation Page

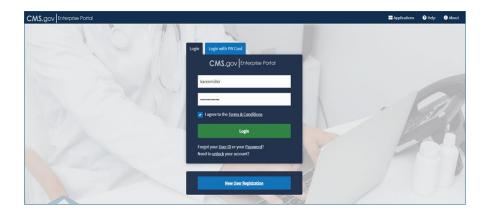
<u>Step 8</u>: Request access to the Open Payments system.

3.2c: Requesting Access to Open Payments with IDM Credentials

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

<u>Step 1:</u> On the CMS Enterprise Portal home page, enter your CMS User ID and Password and agree to "Terms & Conditions" by selecting the checkbox next to the "Agree to our Terms & Conditions" link. Select the **Login** button to log in.

Figure 17: CMS.gov Enterprise Portal Landing Page



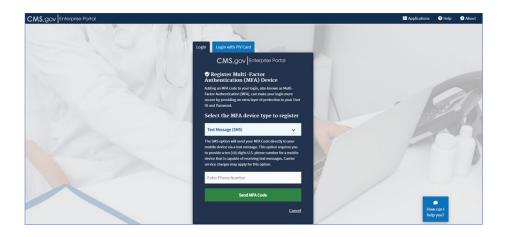
You will be prompted to register a Multi-Factor Authentication (MFA) device. Select the MFA you would like to register by using the drop-down arrow.

Figure 18: Registering a Multi-Factor Authentication (MFA) Device



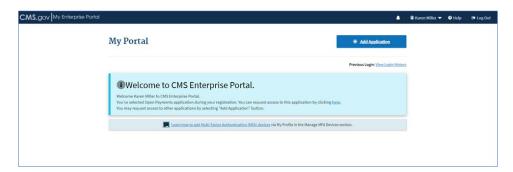
Next, enter the information for your MFA (in figure 19, the user selected "Text Message (SMS)" as their MFA device).

Figure 19: Entering Device MFA Information



<u>Step 2:</u> You will land on the "My Portal" page. Select the **Add Application** button.

Figure 20: "My Portal" Page



Step 3: Select Open Payments from the dropdown. There are three roles that are applicable for users:

Reporting Entity Officer or Teaching Hospital Authorized Official Role: Only US users that are registering a NEW reporting entity profile (applicable manufacturer or applicable group purchasing organization) not already registered in the Open Payments system or a NEW teaching hospital profile, should choose this role. Go to Step 3a (below) to request this role.

Physician, Non-Physician Practitioner, Teaching Hospital Authorized Representative, or Reporting Entity Submitter/Attester/Compliance Role: Only US and foreign (those users that do not have a US-based address and/or a US Social Security number) physicians, non-physician practitioners, and users nominated for a role by a covered recipient/registered entity should choose this role including reporting entity officers and teaching hospital authorized officials who were nominated (or are self-nominating). Users who will be registering a NEW reporting entity profile (applicable manufacturer or applicable group purchasing organization) or users registering a NEW teaching hospital profile should NOT choose this role. Go to Step 3a (below) to request this role.

Open Payments Foreign User Role: Only foreign users (those users that do not have a US-based address and/or a US Social Security number) who are registering a NEW reporting entity profile (applicable manufacturer or applicable group purchasing organization) not already registered in the Open Payments system) or a NEW teaching hospital profile, should choose this role. Note: After selecting this role, users should wait for an email from the Open Payments Help Desk that will provide additional information. Go to Step 3c (below) to request this role.

Figure 21: "Request Application Access" Page



Step 3a: Choosing the **Reporting Entity Officer or Teaching Hospital Authorized Official Role:**

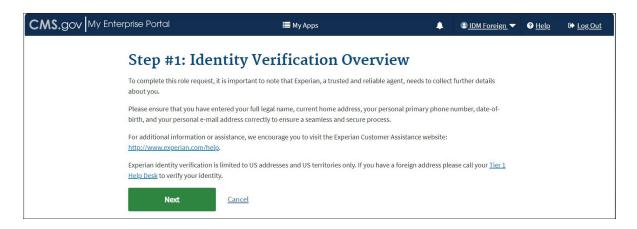
1) Select the Reporting Entity Officer or Teaching Hospital Authorized Official Role, and then select Next.



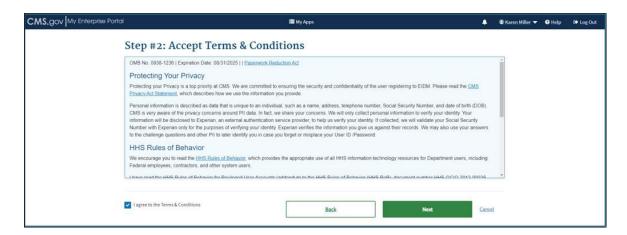
2) Next, select Launch to begin Identity Verification (RIDP).



3) Select Next to begin.



- 4) Experian will perform a soft credit inquiry to verify your identity. Identity proofing does not affect your credit score. 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. If you have questions about Experian's verification process, please refer to Experian Customer Assistance at http://www.experian.com/help/.
- 5) After reading the Terms and Conditions, select Next.



- 6) When entering your information into the Identity Verification screen, ensure you enter only your personal information. <u>You will only have three attempts to enter information that</u> matches the Experian database.
- 7) Tips for successfully completing Identity Verification:

Full Legal Name:

- You must use your full legal name as listed on your Driver's License or financial account information.
- Your surname must match the surname Experian has for you on file.
- Do not use nicknames.
- If you have a two-part name, enter the second part in the middle name field.

Social Security Number:

• Ensure that Social Security Number fields are filled in correctly. Users can review and edit these fields prior to sending the information to Experian.

Date of Birth:

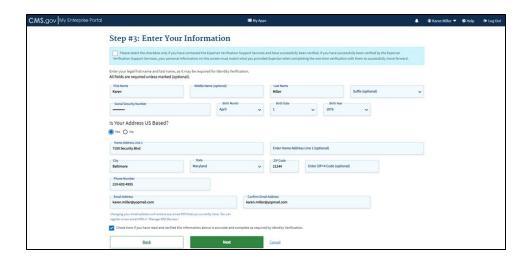
• Ensure that the Date of Birth field is entered accurately. Users can review and edit this field prior to sending the information to Experian.

Current Residential Address:

- Ensure your personal/residential/home address is used:
 - Where you receive Credit card, utility bill statements.
- Associated with your credit report.
- Do NOT use your business address.
- If you have a recent change in address, try to identity proof with a prior address.
- Do not enter any extraneous symbols in the address field.

Personal Phone Number

- Enter a personal landline phone number (if you have one).
- A cell phone can be used, but a residential landline is preferred.
- 8) After reviewing the above information enter your information in the spaces provided, and then select **Next.**

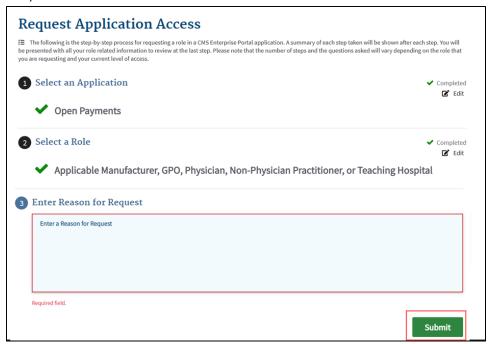


9) If RIDP is successful, you will receive the confirmation notice. Select **Next** to continue.

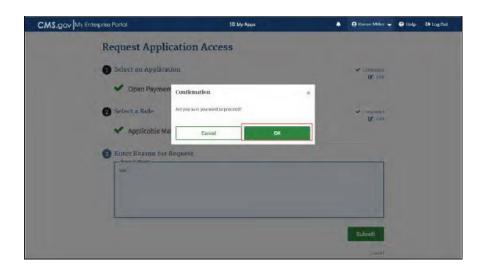


10) If RIDP is unsuccessful, note the response code, and follow the directions in the Error message. If the Error message refers you to the "Tier 1 Help Desk", call the Open Payments Help Desk at 1-855-326-8366. For the TTY line, call 1-844-649-2766.

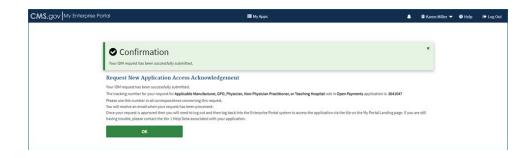
11) Once you have completed Identity Verification, enter a brief justification for being granted this role, and select **Submit**.



12) You will be shown a confirmation screen. Select OK.



13) Review the information and select OK.



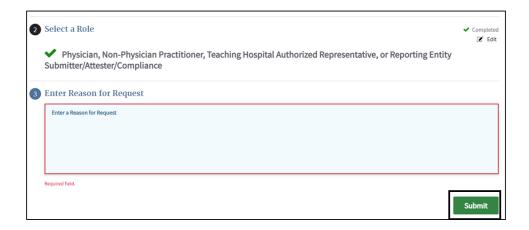
14) After selecting **OK**, log out of the system and log back in to continue to the next steps.

Step 3b: Choosing the **Physician, Non-Physician Practitioner, Teaching Hospital Authorized Representative, or Reporting Entity Submitter/Attester/Compliance Role:**

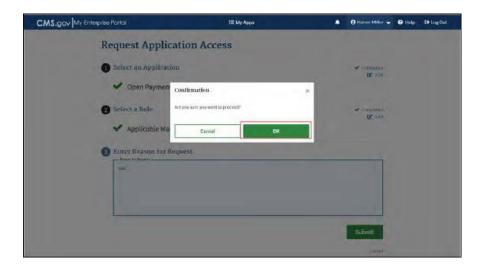
1) Select the Physician, Non-Physician Practitioner, Teaching Hospital Authorized Representative, or Reporting Entity Submitter/Attester/Compliance role, and then select Next.



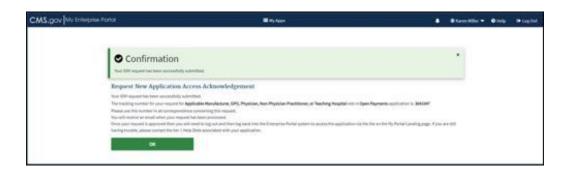
2) Enter a brief reason for requesting the role and then select **Submit**.



3) You will receive a Confirmation page. Select OK, then log out and back in again to begin creating your Open Payments profile.



4) You will receive a Confirmation page. Select OK, then log out and back in again to begin creating your Open Payments profile.

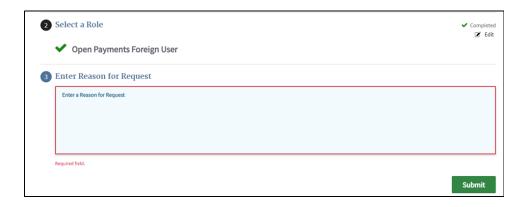


Step 3c: Choosing the **Open Payments Foreign User Role:**

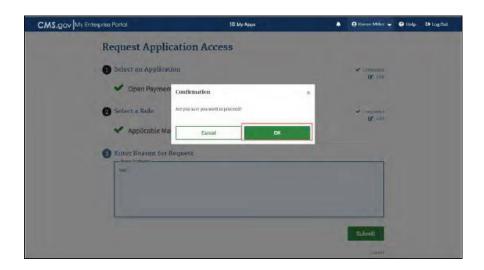
1) Select the **Open Payments Foreign User Role** and select Next.



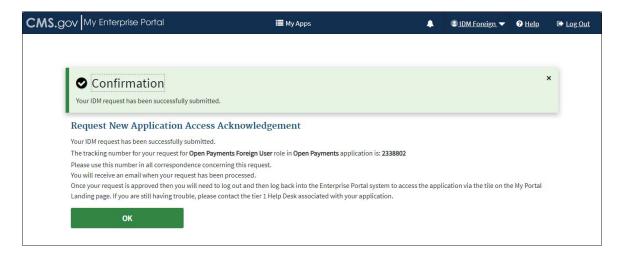
2) Enter a brief justification for requesting this role, then select **Submit**.



3) You will be shown a confirmation screen. Select **OK**.



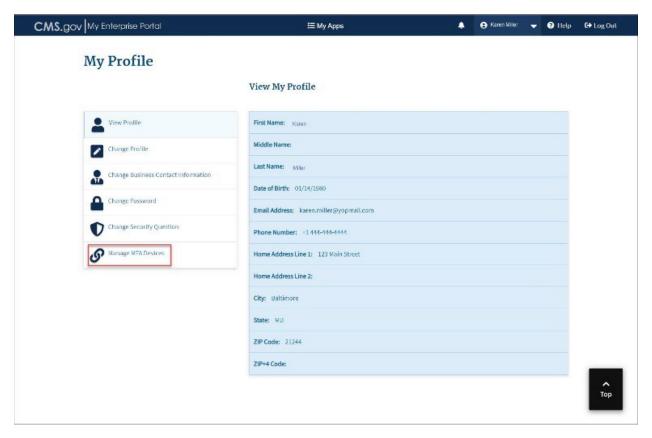
4) You will see confirmation that you requested this role. You will receive an email from the Open Payments Help Desk in one to two business days providing you with your next steps.



3.2d: Adding Multi-Factor Authentication (MFA) Level Of Assurance (LOA) 3 Users - Optional To add Multi-Factor Authentication (MFA):

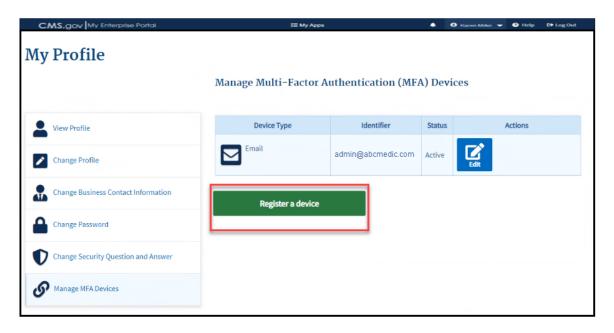
Step 1: Navigate to My Profile and select Manage MFA Devices.

Figure 17: My Profile



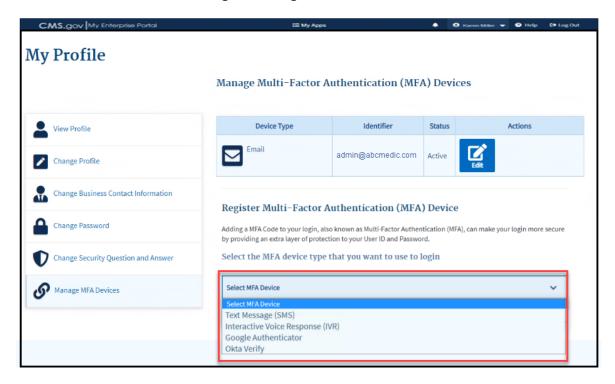
Step 2: Select "Register a Device".

Figure 18: Manage MFA Device Register a Device Page



Step 3: Select the device you wish to register.

Figure 19: Register MFA Devices



<u>Step 4:</u> Depending on the device you choose to register, you will be asked to provide information about that device (Phone number). Enter the required information for the device you are registering for and select "Send MFA Code".

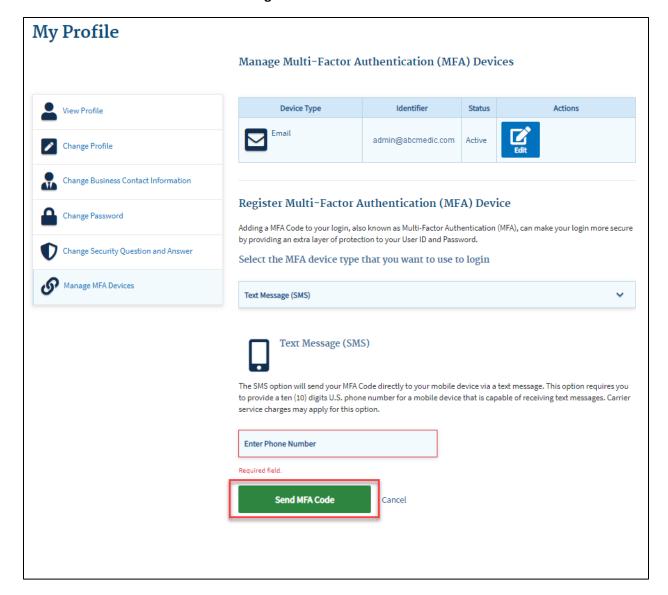
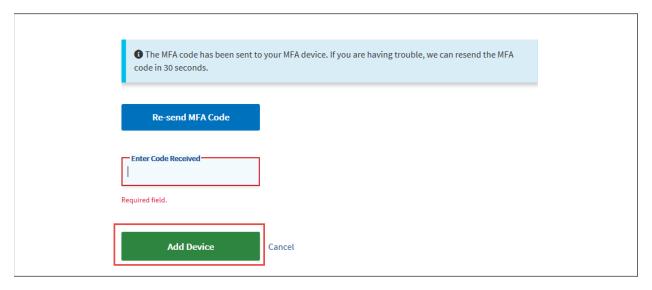


Figure 20: Send MFA Code

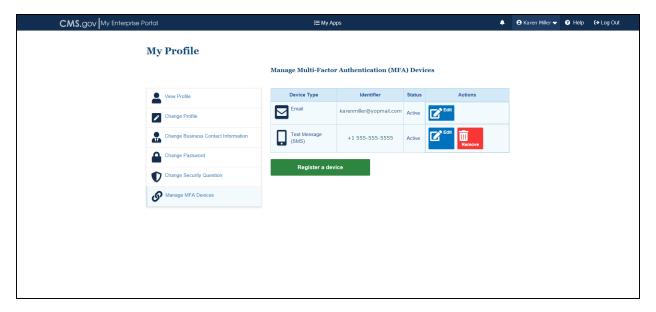
Step 5: Enter the code sent to your device and select "Add Device" to successfully add your MFA Device.

Figure 21: Enter MFA Device Code



Step 6: You have successfully added an MFA device to your IDM account.

Figure 22: Manage MFA Devices Page



Section 3.3: Creating a profile in the Open Payments System

A physician and NPP must create a profile for him or herself in the Open Payments system and undergo a vetting process to be fully registered in the Open Payments system. See Section 3.3c for more information on physician vetting and section 3.3f for more information on NPP vetting. The physician

and NPP profile process has five steps, as shown in Figure 31 below. Details on these steps are included later in this chapter.

Figure 23: Physician and NPP Registration Process



Figures 33, 34, and **35** detail the fields which are required and optional when creating physician and NPP user profiles. It is important to have this information on hand prior to beginning the registration process.

Figure 24: Required and Optional Fields for Physician Profiles

| Fields | Required or Optional? |
|---------------------------------------|-----------------------|
| Practice Name | Optional |
| Practice Business Address | Required |
| Covered Recipient Type | Required |
| Physician Primary Type | Required |
| National Provider Identifier (NPI)** | Optional |
| Drug Enforcement Administration (DEA) | Optional |
| Number** | |
| Taxonomy Code (at least 1) | Required |
| License State (at least 1) | Required |
| License Number (at least 1) | Required |

Figure 25: Required and Optional Fields for NPP Profiles

| Fields | Required or Optional? |
|---|-----------------------|
| Practice Name | Optional |
| Practice Business Address | Required |
| Covered Recipient Type | Required |
| Non-Physician Practitioner Primary Type | Required |
| National Provider Identifier (NPI)** | Optional |
| Drug Enforcement Administration (DEA) | Optional |
| Number** | |
| Taxonomy Code (at least 1) | 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.

Records submitted to Open Payments are associated with physician and NPP license numbers and NPI. Therefore, when registering in the Open Payments system, physicians and NPPs must enter at least one of the state license numbers they hold, as well as their NPI number (if they have one).

Figure 26: 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 (for Physicians and NPPs) | 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 profile creation, and are approved immediately in the Open Payments system 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 https://www.cms.gov/OpenPayments/Resources. 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. (For directions on registering a teaching hospital for a prior program year, see Section 3.3i.) 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 35** below. Details on these steps are included later in this chapter.

Figure 27: Teaching Hospital Registration Process



Figures 37 and **38** 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.

Figure 28: 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 29: 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 list of required information for profiles for physicians, NPPs, and teaching hospitals is also available in the quick reference guide "Required Fields for Registration," which can be downloaded from the Resources page of the Open Payments website (https://www.cms.gov/OpenPayments/Resources).

The entire registration process takes approximately 30 minutes and must be completed in a single session. You cannot save entries or complete the profile later. You 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, NPP, 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/.
- If you cannot find your DEA number, contact the DEA Office of Diversion Control. Their website is https://www.deadiversion.usdoj.gov.

3.3a: Creating a profile 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 or Non-Physician Practitioner" 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 3.3g for registering a teaching hospital.

Note that if you select the "Teaching Hospital" option, 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, create a second profile and select the "Physician or Non-Physician Practitioner" option. You may be registered for both options and can alternate between physician and teaching hospital profiles using the "Switch User" functionality described in Section 3.3j.

<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM credentials and navigate to the Open Payments home page. Select the Application link.



Figure 30: Open Payments Home Screen

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.

Figure 31: Open Payments Landing Page For First-Time System Users



<u>Step 2:</u> The on-screen text contains important information regarding creating the physician profile. Read the on-screen text and select the link to the quick reference guide "Required Fields for Registration" for a list of information required during registration. Select "Start Profile" at the bottom of the page when you are ready to continue.

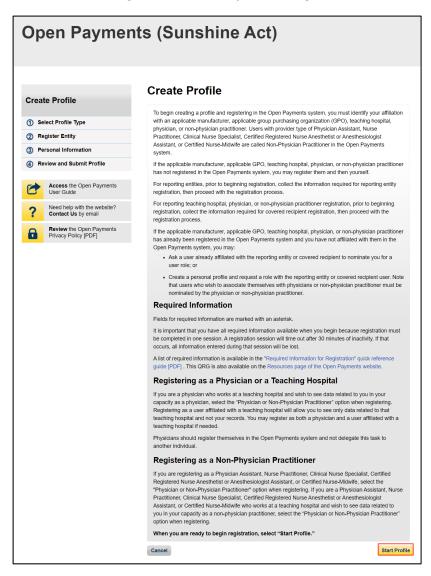
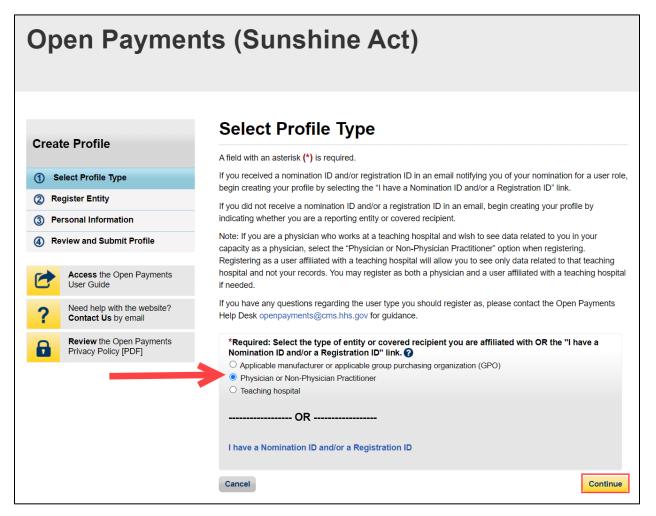


Figure 32: Create My Profile Page

<u>Step 3:</u> Select the profile type "Physician or Non-Physician Practitioner" and select the "Continue" button.

Figure 33: Select Profile Type Page



<u>Step 4:</u> Enter your personal information. All required fields will be marked with an asterisk (*). You will not be able to proceed with registration until all the required fields have been entered. You may register with foreign address by selecting "Country" field drop down value other than "United States".

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 done, select the "Continue" button.

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

Open Payments (Sunshine Act) Covered Recipient: Personal Information Create Profile A field with an asterisk (*) is required. Select Profile Type Provide personal and business information below to create the physician or non-physician practitioner profile. The first name and last name fields have been prepopulated from your CMS Identity Management System (IDM) Personal Information profile. You may edit these fields as needed. However, changing this information in Open Payments will not 3 Review and Submit Profile change the corresponding information in your IDM profile. If you are registered with the National Plan & Provider Enumeration System (NPPES) or the Provider Enrollment, Chain and Ownership System (PECOS), the information you enter here must match the Access the Open Payments User Guide [PDF] information in those systems for your registration to be successful. Note that once a physician or non-physician practitioner profile has been successfully matched using CMS Need help with the website? **Contact Us** by email resources (vetted), the fields prepopulated by IDM 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 openpayments@cms.hhs.gov for assistance. **Review** the Open Payments Privacy Policy [PDF] **Your Name** *First Name: Middle Name: Karen Suffix (Jr., Sr., etc.): Miller **Business Information** Enter your business information below. If you have multiple practice addresses, enter the primary practice location. *Business Email Address: openpayments@yopmail.com **Practice Business Address** *Country: Please Select *Practice Business Address, Line 1: 7500 Security Blvd. Practice Business Address, Line 2: *City Name: *State: Baltimore Maryland *Business Telephone Number: *Zip Code: 9999 21244 555-555-5555 Cancel Back Continue

Figure 34: Covered Recipient Personal Information Page

Step 5: Enter your covered recipient details. All required fields will be marked with an asterisk (*).

The National Provider Identifier (NPI) and Drug Enforcement Administration (DEA) Number fields are not marked as required; however, they must be entered if you have them. If you do not have these identifiers, you can still proceed with registration.

- The ZIP Code entered by the physician is validated to ensure it is a valid United States ZIP code and that it is within the "State" entered.
- If the physician has a National Provider Identifier (NPI), enter it exactly as listed in NPPES for the current calendar year.
- Enter at least one active state license.
- For each license or taxonomy code entered, select the "Add" button to save the information to the profile. Without selecting the "Add" button, the information will not be saved. Physicians can register using up to 6 Taxonomy Codes. To update or replace an existing Taxonomy, select the "Edit" or the "Delete" button.

Refer to the taxonomy code list on the Resources page of the Open Payments website (https://www.cms.gov/OpenPayments/Resources). Taxonomy codes not on the taxonomy code list should not be entered. As you begin entering information into the Taxonomy Code field, the system will provide a list of codes to help guide your entry. If your taxonomy code is not available, select the code that most closely represents your specialty. Select "Add" after entering each taxonomy code to add it to your profile.

To enter license information, select the state in which the license is held and enter the license number. Select the "Add" button to add the license. 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. If you input data into the field and select the "Continue" button before selecting the "Add" button, the system will throw an error message. If you have licenses in more than one state, enter in the first state and license number and then select "Add." Repeat until all of your state licenses have been added. You can enter up to 52 licenses. When you are finished, select the "Continue" button.

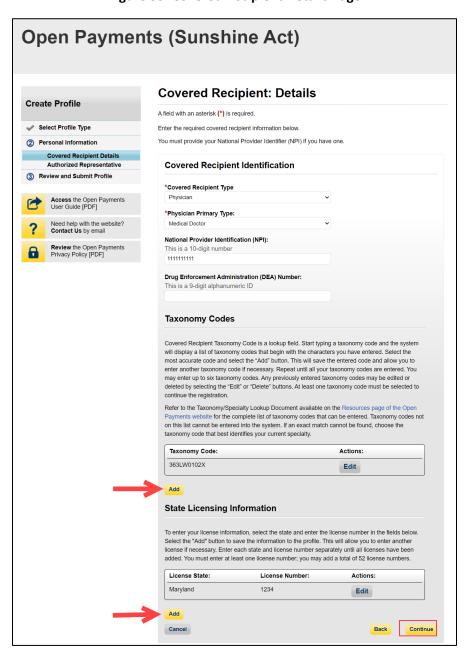


Figure 35: Covered Recipient Details Page

<u>Step 6:</u> 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 3.4a. The access levels are also summarized on the page. When you are finished, select the "Continue" button.

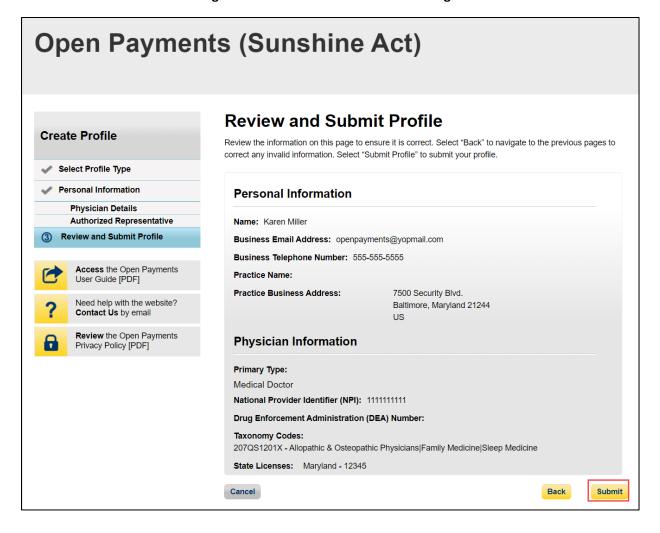
You do not need to designate an authorized representative during initial registration and may do so later. If you choose not to designate an authorized representative currently, select "Not Now" and then select the "Continue" button. For instructions on how to nominate an authorized representative after registration is complete, see Section 3.5a.

Open Payments (Sunshine Act) Physician: Authorized Representative Create Profile A field with an asterisk (*) is required. A physician may designate an authorized representative to take certain actions on his or her behalf in the Open Select Profile Type Payments system. This person can be another physician, an office manager, a practice manager, or any other 2 Personal Information person the physician wants to designate. Physician Details The nominated authorized representative will receive an email stating that he or she has been nominated for the **Authorized Representative** role. The nominated individual 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. The Review and Submit Profile nominee will have 10 days to accept or reject the role. The nomination will expire if the nominee does not Access the Open Payments Nominate the Physician Authorized Representative in the Open User Guide [PDF, 28.8 MB] **Payments System** Need help with the website? You can nominate an individual now by providing the nominee's information below or later via the physician Contact Us by email profile page in the Open Payments system. Review the Open Payments Note: physician authorized representative nominees must register in the CMS Enterprise Identity Management Privacy Policy [PDF, 102 KB] (EIDM) system for login credentials before he or she can log into Open Payments and take action on the nomination. 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? Cancel Back Continue

Figure 36: Nominate a Physician Authorized Representative Page

<u>Step 7:</u> 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."

Figure 37: Review and Submit Profile Page



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.

Figure 38: Success Confirmed Page



3.3b: Creating a profile as a Physician for a User with another Role (Returning System Users)

If you are creating a profile as a physician and you are already affiliated with a reporting entity or teaching hospital in the Open Payments system, follow the steps below.

<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM credentials and navigate to the Open Payments home page. Select the "Switch User Type" link above the menu bar on the Open Payments home page.

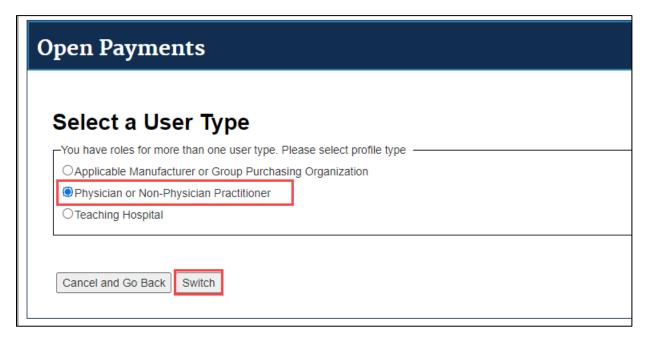
Figure 39: Open Payments System Landing Page for Returning System User



<u>Step 2:</u> On the "Open Payments Registration" page, under the heading "Select a User Type" select the "Physician or Non-Physician Practitioner" radio button. Select the "Switch" button. If you decide you do not want to change user types, or you selected "Switch User Type" by accident, select "Cancel and Go Back."

Note: Changes made here will not automatically update user's profile information in his/her other CMS accounts.

Figure 40: Select User Type Page



<u>Step 3</u>: Select the "Create My Profile" button to create the Physician profile. Follow the steps in Section 3.3a to complete Physician registration.

Figure 41: Open Payments System Landing Page for First-Time System Users



3.3c: 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. The physician profile is not considered complete until the vetting process has been successfully completed.

The vetting process will typically require little action from the user 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 (if physician has an NPI), state license information, and primary type. The Open Payments system will match physician information against multiple data sources. Note: If the physician has an NPI but neglects to provide it they will not be able to successfully complete vetting.

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.

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 Deskat 1-855-326-8366. For the TTY line, call 1-844-649-2766.

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 1-855-326-8366 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.

3.3d: Creating a profile as an NPP (First Time System Users)

If you are registering as a NPP and are a first-time user in the Open Payments system, follow the steps below.

Note: If you are a NPP who works in a teaching hospital and wish to see data related to you in your capacity as an NPP, select the "Physician or Non-physician practitioner" option when registering. If you are a NPP 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 3.3g 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 NPP, register a second time and select the "Physician or Non-Physician Practitioner"

option. You may be registered for both options and can alternate between NPP and teaching hospital profiles using the "Switch User" functionality described in Section 3.3j.

<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM credentials and navigate to the Open Payments home page. Select the Application link.

Figure 42: Open Payments Home Screen



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.

Figure 43: Open Payments Landing Page For First-Time System Users



<u>Step 2:</u> The on-screen text contains important information regarding creating the NPP profile. Read the on-screen text and select the link to the quick reference guide "Required Fields for Registration" for a list of information required during registration. Select "Start Profile" at the bottom of the page when you are ready to continue.

Open Payments (Sunshine Act) Create Profile 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, Select Profile Type physician, or non-physician practitioner. Users with provider type of Physician Assistant, Nurse 2 Register Entity Practitioner, Clinical Nurse Specialist, Certified Registered Nurse Anesthetist or Anesthesiologist Assistant, or Certified Nurse-Midwife are called Non-Physician Practitioner in the Open Payments ③ Personal Information Review and Submit Profile $If the applicable \ manufacturer, applicable \ GPO, teaching \ hospital, physician, or \ non-physician \ practitioner$ has not registered in the Open Payments system, you may register them and then yourself. For reporting entities, prior to beginning registration, collect the information required for reporting entity Access the Open Payments User Guide registration, then proceed with the registration proces For reporting teaching hospital, physician, or non-physician practitioner registration, prior to beginning eed help with the website? registration, collect the information required for covered recipient registration, then proceed with the Contact Us by email registration process. Review the Open Payments If the applicable manufacturer, applicable GPO, teaching hospital, physician, or non-physician practitioner has already been registered in the Open Payments system and you have not affiliated with them in the Open Payments system, you may: Ask a user already affiliated with the reporting entity or covered recipient to nominate you for a • Create a personal profile and request a role with the reporting entity or covered recipient user. Note that users who wish to associate themselves with physicians or non-physician practitioner must be nominated by the physician or non-physician practitioner. Required Information Fields for required information are marked with an asterisk It is important that you have all required information available when you begin because registration must be completed in one session. A registration session will time out after 30 minutes of inactivity. If that occurs, all information entered during that session will be lost. A list of required information is available in the "Required Information for Registration" quick reference guide [PDF] . This QRG is also available on the Resources page of the Open Payments website Registering as a Physician or a Teaching Hospital If you are a physician who works at a teaching hospital and wish to see data related to you in your capacity as a physician, select the "Physician or Non-Physician Practitioner" option when registering. Registering as a user affiliated with a teaching hospital will allow you to see only data related to that teaching hospital and not your records. You may register as both a physician and a user affiliated with a teaching hospital if needed. Physicians should register themselves in the Open Payments system and not delegate this task to Registering as a Non-Physician Practitioner If you are registering as a Physician Assistant, Nurse Practitioner, Clinical Nurse Specialist, Certified Registered Nurse Anesthetist or Anesthesiologist Assistant, or Certified Nurse-Midwife, select the "Physician or Non-Physician Practitioner" option when registering. If you are a Physician Assistant, Nurse Practitioner, Clinical Nurse Specialist, Certified Registered Nurse Anesthetist or Anesthesiologist Assistant, or Certified Nurse-Midwife who works at a teaching hospital and wish to see data related to

Figure 44: Create My Profile Page

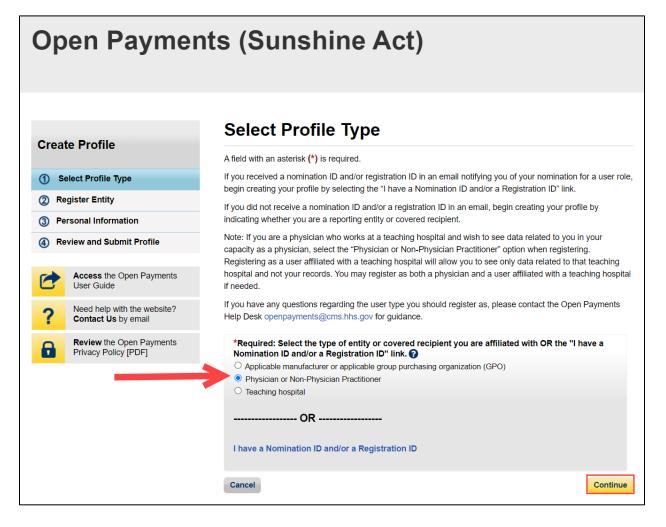
When you are ready to begin registration, select "Start Profile."

option when registering.

you in your capacity as a non-physician practitioner, select the "Physician or Non-Physician Practitioner"

<u>Step 3:</u> Select the profile type "Physician or Non-physician Practitioner" and select the "Continue" button.

Figure 45: Select Profile Type Page



<u>Step 4:</u> Enter your personal information. All required fields will be marked with an asterisk (*). All required fields must be entered to proceed with the profile. You may register with foreign address by selecting "Country" field drop down value other than "United States".

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 done, select the "Continue" button.

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

Open Payments (Sunshine Act) Covered Recipient: Personal Information Create Profile A field with an asterisk (*) is required. Provide personal and business information below to create the physician or non-physician practitioner profile Select Profile Type The first name and last name fields have been prepopulated from your CMS Identity Management System (IDM) 2 Personal Information profile. You may edit these fields as needed. However, changing this information in Open Payments will not change the corresponding information in your IDM profile. 3 Review and Submit Profile If you are registered with the National Plan & Provider Enumeration System (NPPES) or the Provider Enrollment, Chain and Ownership System (PECOS), the information you enter here must match the information in those systems for your registration to be successful. $\label{eq:constraint}$ Note that once a physician or non-physician practitioner profile has been successfully matched using CMS resources (vetted), the fields prepopulated by IDM 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 openpayments@cms.hhs.gov for assistance. Review the Open Payments Privacy Policy [PDF] **Your Name** *First Name Middle Name: Karen *Last Name: Suffix (Jr., Sr., etc.): Miller **Business Information** Enter your business information below. If you have multiple practice addresses, enter the primary practice location. *Business Email Address: openpayments@yopmail.com Practice Name: **Practice Business Address** *Country: Please Select *Practice Business Address, Line 1: Practice Business Address, Line 2: *City Name: *State: Baltimore Maryland *Business Telephone Number: 21244 555-555-5555 Cancel

Figure 46: Covered Recipient Personal Information Page

Step 5: Enter your covered recipient details. All required fields will be marked with an asterisk (*).

The National Provider Identifier (NPI) and Drug Enforcement Administration (DEA) Number fields are not marked as required; however, they must be entered if they have been assigned to you. If you do not have these identifiers, you can still proceed with registration.

Note the following:

- You can select up to 6 primary types in the "Non-Physician Practitioner Primary Type" multiselect field.
- The ZIP Code entered by the NPP is validated to ensure it is a valid United States ZIP Code and that it is within the "State" entered.
- If the NPP has a National Provider Identifier (NPI), enter it exactly as listed in NPPES for the current calendar year.
- Enter at least one active state license.
- For each license or taxonomy code entered, select the "Add" button to save the information to the profile. Without selecting the "Add" button, the information will not be saved. NPPs can register using up to 6 Taxonomy Codes. To update or replace an existing Taxonomy, select the "Edit" or the "Delete" button.

Refer to the taxonomy code list on the Resources page of the Open Payments website (https://www.cms.gov/OpenPayments/Resources). Taxonomy codes not on the taxonomy code list should not be entered. As you begin entering information into the Taxonomy Code field, the system will provide a list of codes to help guide your entry. If your taxonomy code is not available, select the code that most closely represents your specialty. Select "Add" after entering each taxonomy code to add it to your profile.

To enter license information, select the state in which the license is held and enter the license number. Select the "Add" button to add the license. 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. If you input data into the field and select the "Continue" button before selecting the "Add" button, the system will throw an error message. If you have licenses in more than one state, enter in the first state and license number and then select "Add." Repeat until all of your state licenses have been added. You can enter up to 52 licenses. When you are finished, select the "Continue" button.

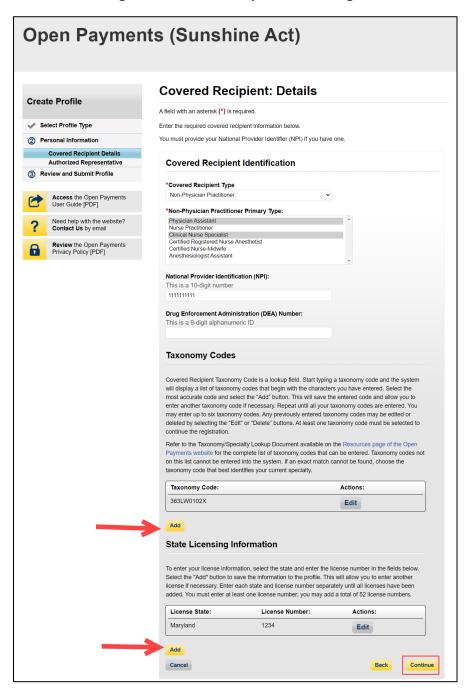


Figure 47: Covered Recipient Details Page

<u>Step 6:</u> 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 NPP 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 3.4b. The access levels are also summarized on the page. When you are finished, select the "Continue" button.

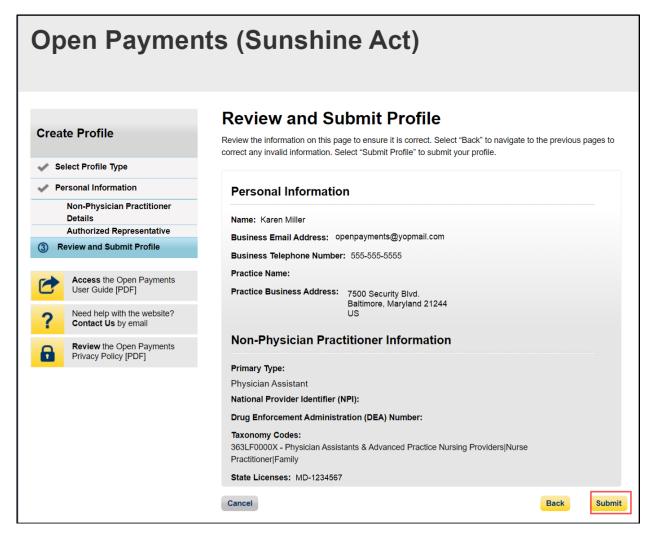
You do not need to designate an authorized representative during initial registration and may do so later. If you choose not to designate an authorized representative currently, select "Not Now" and then select the "Continue" button. For instructions on how to nominate an authorized representative after registration is complete, see Section 3.5a.

Open Payments (Sunshine Act) Non-Physician Practitioner: Authorized **Create Profile** Representative Select Profile Type A field with an asterisk (*) is required. A non-physician practitioner may designate an authorized representative to take certain actions on his or her Personal Information behalf in the Open Payments system. This person can be another non-physician practitioner, an office manager, Non-Physician Practitioner a practice manager, or any other person the non-physician practitioner wants to designate. The nominated authorized representative will receive an email stating that they have been nominated for the **Authorized Representative** role. The nominated individual must accept this role in the Open Payments system to become an authorized Review and Submit Profile representative. The nominee will have 10 days to accept or reject the role. The nomination will expire if the nominee does not respond within 10 days. If the nominee rejects the role or does not accept the role within the allotted 10 days, the non-physician practitioner may nominate another person. Access the Open Payments User Guide [PDF] Nominate the Non-Physician Practitioner Authorized Representative in the Open Payments System Need help with the website? Contact Us by email You can nominate an individual now by providing the nominee's information below or later via the non-physician practitioner profile page in the Open Payments system. Review the Open Payments Note: Non-physician practitioner authorized representative nominees must register in the CMS Identity Privacy Policy [PDF] Management (IDM) system for login credentials before they can log into Open Payments and take action on the nomination. If the nominee accepts the role, they will then be prompted to create an individual profile in the Open Payments system. *Designate an authorized representative? Continue Cancel Back

Figure 48: Nominate a NPP Authorized Representative Page

<u>Step 7:</u> 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."

Figure 49: Review and Submit Profile Page



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.

Figure 50: Success Confirmed Page

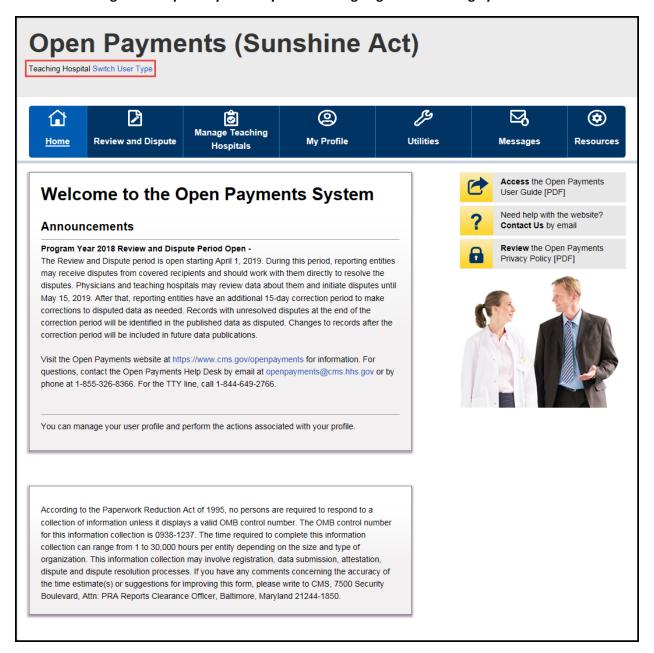


3.3e: Creating a profile as an NPP for a User with another Role (Returning System Users)

If you are registering as a NPP and you are already affiliated with a reporting entity or teaching hospital in the Open Payments system, follow the steps below.

<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM credentials and navigate to the Open Payments home page. Select the "Switch User Type" link above the menu bar on the Open Payments home page.

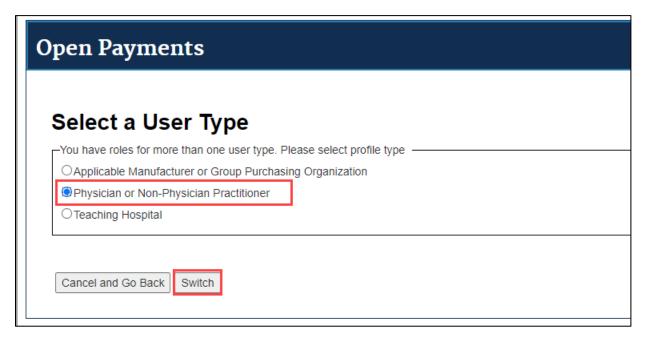
Figure 51: Open Payments System Landing Page for Returning System User



<u>Step 2:</u> On the "Open Payments Registration" page, under the heading "Select a User Type" select the "Physician or Non-Physician Practitioner" radio button. Select the "Switch" button. If you decide you do not want to change user types, or you selected "Switch User Type" by accident, select "Cancel and Go Back."

Note: Changes made here will not automatically update user's profile information in his/her other CMS accounts.

Figure 52: Select User Type Page



<u>Step 3</u>: Select the "Create My Profile" button to create the NPP profile. Follow the steps in Section 3.3d to complete NPP registration.

Figure 53: Open Payments System Landing Page for First-Time System Users



3.3f: NPP Vetting

Vetting is the process of verifying an NPP's identity. This is done to ensure that the NPP is a valid covered recipient and to aid in the matching of submitted payments to the corresponding NPPs. All NPPs registering in the Open Payments system will be vetted. Vetting occurs once the NPP has submitted his

or her profile to the Open Payments system. **NPP registration is not considered complete until the vetting process has been successfully completed.**

The vetting process will typically require little action from the user to complete it. Once the NPP submits the NPP user profile, the vetting process begins. The process will attempt to vet the NPP using the information provided in the NPP profile, so it is important for the NPP to provide as much information as possible to aid in the vetting process. Particularly important are the NPP's first and last name, NPI (if NPP has an NPI), state license information, and primary type. The Open Payments system will match NPP information against multiple data sources. Note: If the NPP has an NPI but neglects to provide it they will not be able to successfully complete vetting.

If vetting fails, the NPP will have the opportunity to correct the information in their profile and resubmit the profile for vetting. The NPP may update their profile as many times as necessary to successfully complete vetting.

If the NPP does not successfully pass vetting despite all of the information provided in the NPP profile being correct to the best of his or her knowledge, or the NPP requires assistance with successfully vetting their profile, contact the Open Payments Help Desk at 1-855-326-8366. For the TTY line, call 1-844-649-2766.

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 NPPs 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 are required after successful vetting, contact the Open Payments Help Desk at 1-855-326-8366 for assistance. CMS encourages NPPs to register and begin the vetting process as early as possible to allow sufficient time for vetting to be completed.

Note: If a NPP profile is modified, the profile will undergo vetting again.

3.3g: 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 creating a profile for a teaching hospital, you must take the role of authorized official for the teaching hospital in the Open Payments system. See Section 3.4b for information on user roles for teaching hospitals.

Note that a physician or NPP 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 and NPPs 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 or NPP, register a second time and select the "Physician or Non-Physician Practitioner" option. Users may be registered for both "Teaching Hospital" and "Physician or Non-Physician Practitioner" User Type options.

<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM 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.

Figure 54: Open Payments System Landing Page for First-Time System Users Top Page View



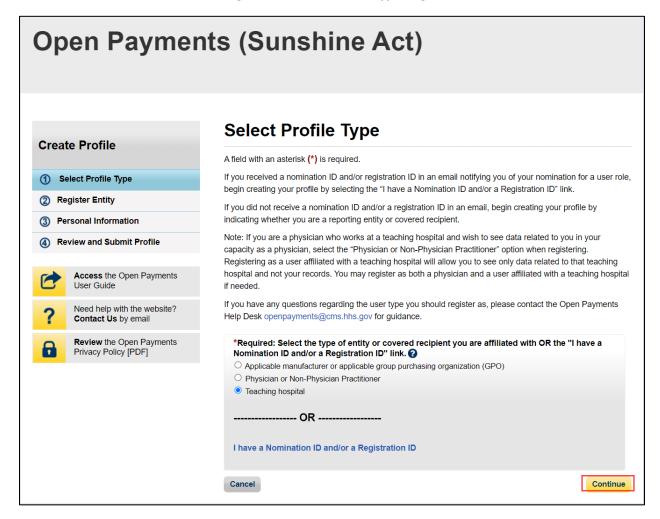
<u>Step 2:</u> The on-screen text contains important information regarding creating the individual profile. Read the on-screen text and select the link to the quick reference guide "Required Fields for Registration" for a list of information required during registration. Select "Start Profile" at the bottom of the page when you are ready to continue.

Open Payments (Sunshine Act) Create Profile 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, Select Profile Type physician, or non-physician practitioner. Users with provider type of Physician Assistant, Nurse 2 Register Entity Practitioner, Clinical Nurse Specialist, Certified Registered Nurse Anesthetist or Anesthesiologist Assistant, or Certified Nurse-Midwife are called Non-Physician Practitioner in the Open Payments ③ Personal Information Review and Submit Profile $If the applicable \ manufacturer, applicable \ GPO, teaching \ hospital, physician, or \ non-physician \ practitioner$ has not registered in the Open Payments system, you may register them and then yourself. For reporting entities, prior to beginning registration, collect the information required for reporting entity Access the Open Payments User Guide registration, then proceed with the registration proces For reporting teaching hospital, physician, or non-physician practitioner registration, prior to beginning eed help with the website? registration, collect the information required for covered recipient registration, then proceed with the Contact Us by email registration process. Review the Open Payments If the applicable manufacturer, applicable GPO, teaching hospital, physician, or non-physician practitioner has already been registered in the Open Payments system and you have not affiliated with them in the Open Payments system, you may: Ask a user already affiliated with the reporting entity or covered recipient to nominate you for a • Create a personal profile and request a role with the reporting entity or covered recipient user. Note that users who wish to associate themselves with physicians or non-physician practitioner must be nominated by the physician or non-physician practitioner. Required Information Fields for required information are marked with an asterisk. It is important that you have all required information available when you begin because registration must be completed in one session. A registration session will time out after 30 minutes of inactivity. If that occurs, all information entered during that session will be lost. A list of required information is available in the "Required Information for Registration" quick reference guide [PDF] . This QRG is also available on the Resources page of the Open Payments website Registering as a Physician or a Teaching Hospital If you are a physician who works at a teaching hospital and wish to see data related to you in your capacity as a physician, select the "Physician or Non-Physician Practitioner" option when registering. Registering as a user affiliated with a teaching hospital will allow you to see only data related to that teaching hospital and not your records. You may register as both a physician and a user affiliated with a teaching hospital if needed. Physicians should register themselves in the Open Payments system and not delegate this task to Registering as a Non-Physician Practitioner If you are registering as a Physician Assistant, Nurse Practitioner, Clinical Nurse Specialist, Certified Registered Nurse Anesthetist or Anesthesiologist Assistant, or Certified Nurse-Midwife, select the "Physician or Non-Physician Practitioner" option when registering. If you are a Physician Assistant, Nurse Practitioner, Clinical Nurse Specialist, Certified Registered Nurse Anesthetist or Anesthesiologist Assistant, or Certified Nurse-Midwife who works at a teaching hospital and wish to see data related to you in your capacity as a non-physician practitioner, select the "Physician or Non-Physician Practitioner" option when registering. When you are ready to begin registration, select "Start Profile."

Figure 55: Create My Profile Page

Step 3: Select the profile type, when finished select the "Continue" button.

Figure 56: Select Profile Type Page



<u>Step 4:</u> 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 dropdowns and select "Search."

If your teaching hospital is not found, select "Register for Prior Program Year" to search for your teaching hospital in 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 3.3i.

If your teaching hospital cannot be found in any program year, contact the Open Payments Help Desk at 1-855-326-8366 for assistance.

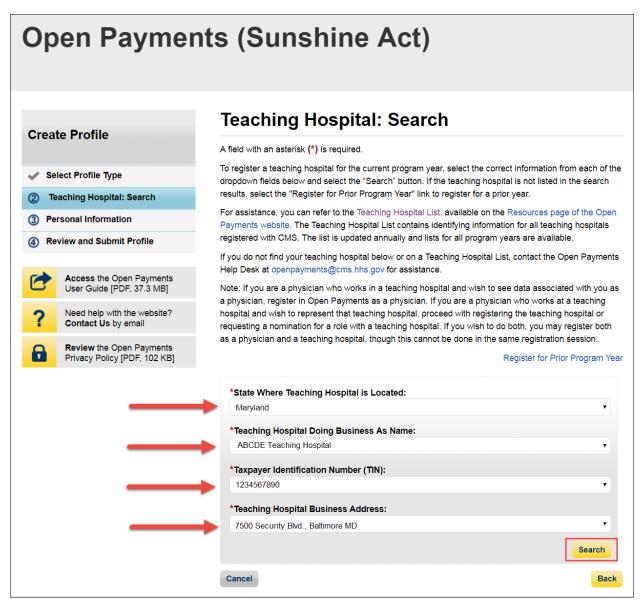
The name of the hospital selected during registration must be the hospital's "Doing Business As" name. In the CMS Teaching Hospital List, the "Doing Business As" name is under the heading of "Hospital

Name." (Refer to Section 3.3i for detailed information on registering a teaching hospital for a prior program year.)

The hospital address selected must be the address listed in the CMS Teaching Hospital List as the hospital's "NPPES Business Address."

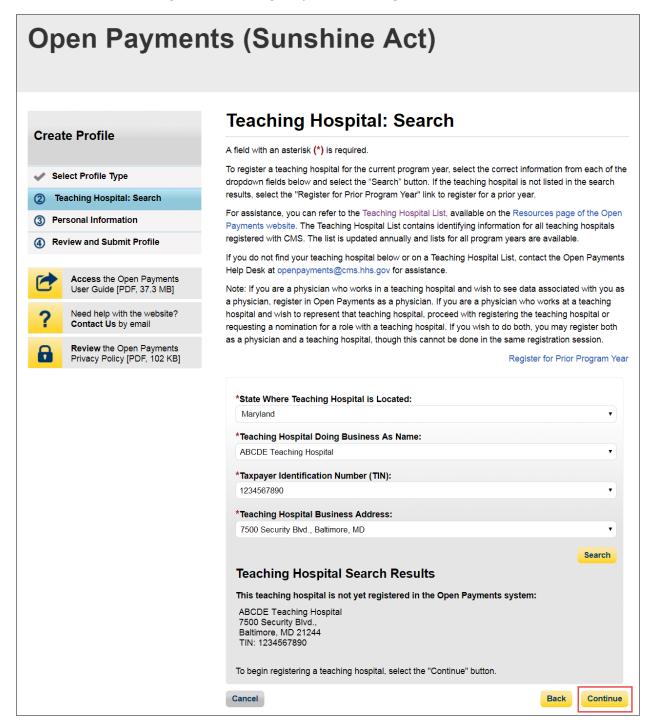
Teaching hospitals are pre-populated into the Open Payments system based on the Open Payments Teaching Hospital List. Teaching hospitals not on this list or prior program year lists will not have payments or other transfers of value reported about them.

Figure 57: Teaching Hospital Search Page



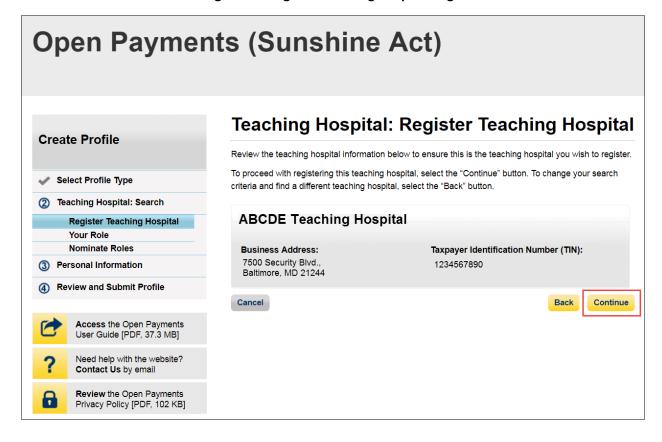
<u>Step 5:</u> Review the information displayed on the page. Select the "Continue" button if the information displayed is the teaching hospital you wish to register. If this is not the correct teaching hospital, select the "Back" button at the bottom of the page to return to the previous page and re-enter the information.

Figure 58: Teaching Hospital Search Page Search Results



Step 6: Review the information displayed on the page. When complete, select the "Continue" button.

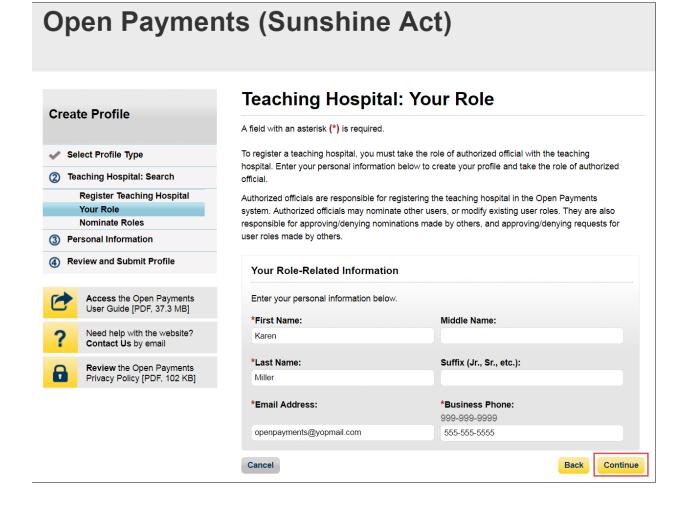
Figure 59: Register Teaching Hospital Page



<u>Step 7:</u> 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 3.4c

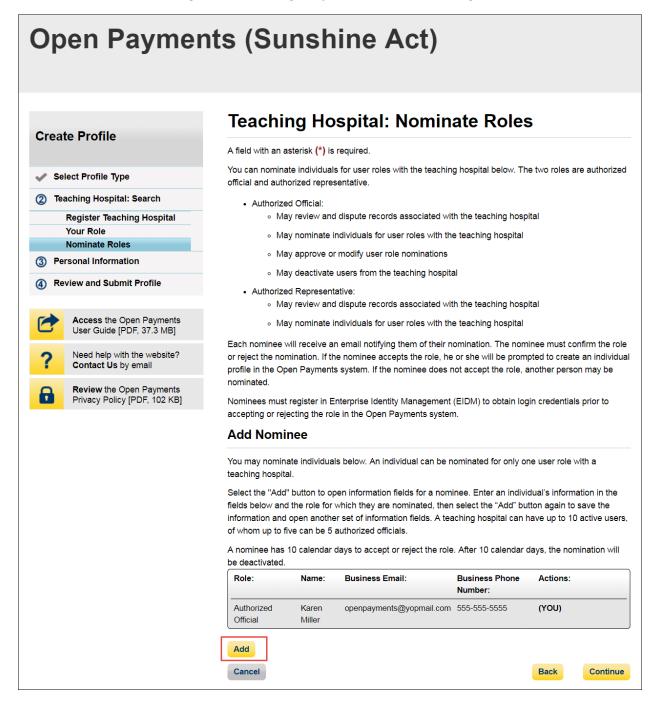
First name, last name, email address, and business phone will be pre-populated with information from your IDM profile. Edit these fields as necessary. All required fields will be marked with an asterisk (*). You will not be able to proceed with registration until all of the required fields have been entered. When complete, select the "Continue" button.

Figure 60: Teaching Hospital Your Role Page



<u>Step 8:</u> 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). If you choose not to add nominees at this time, select the "Continue" button without adding any nominee information and proceed to Step 9.

Figure 61: Teaching Hospital Nominate Roles Page



<u>Step 8a</u>: If you selected "Add," enter the required information for one individual and select either "Authorized Official" or "Authorized Representative" to nominate the individual for the selected role.

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Information on teaching hospital user roles is available in Section 3.4c. When you have entered the information, select "Add." This will add the nominee information to the teaching hospital's profile, as well as open another set of information fields to enter an additional nominee.

Repeat the process until you have entered all 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 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.

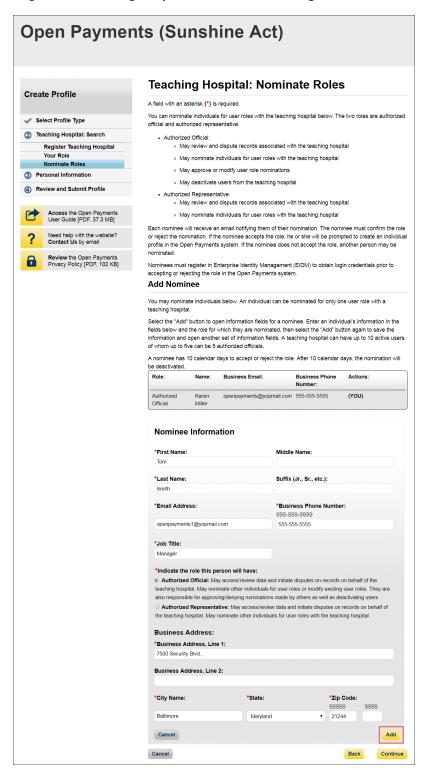
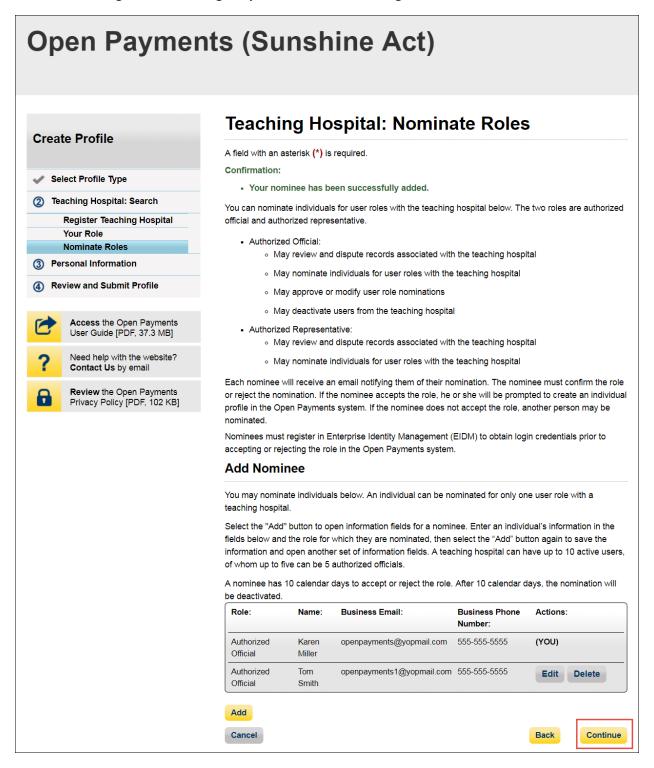


Figure 62: Teaching Hospital Nominate Roles Page Add Nominee

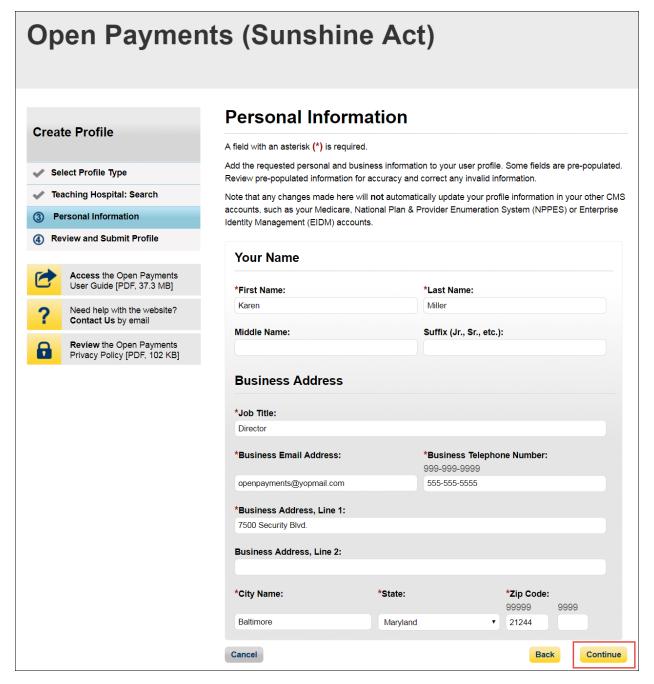
If you entered any nominees, you will see the nominee information displayed on the page. Confirm the information and when complete select the "Continue" button.

Figure 63: Teaching Hospital Nominate Roles Page with Added Nominees



Step 9: Enter your personal information. When finished, select the "Continue" button.

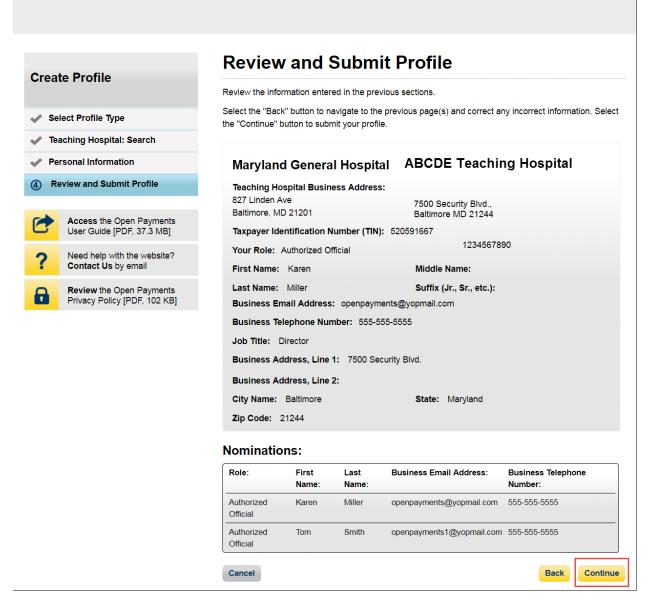
Figure 64: Personal Information Page



<u>Step 10:</u> 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 the "Continue" button.

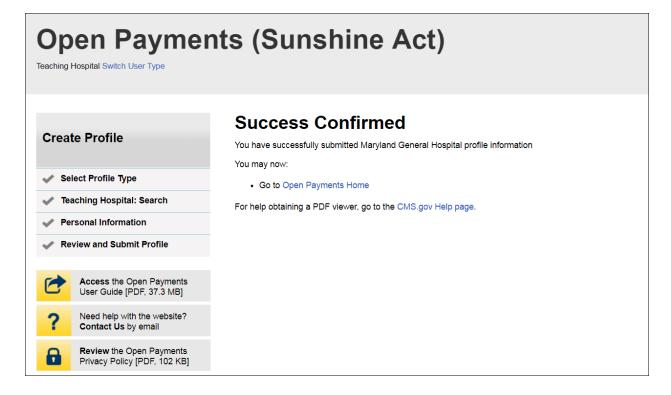
Figure 65: Review and Submit Profile Page

Open Payments (Sunshine Act)



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.

Figure 66: Success Confirmed Page

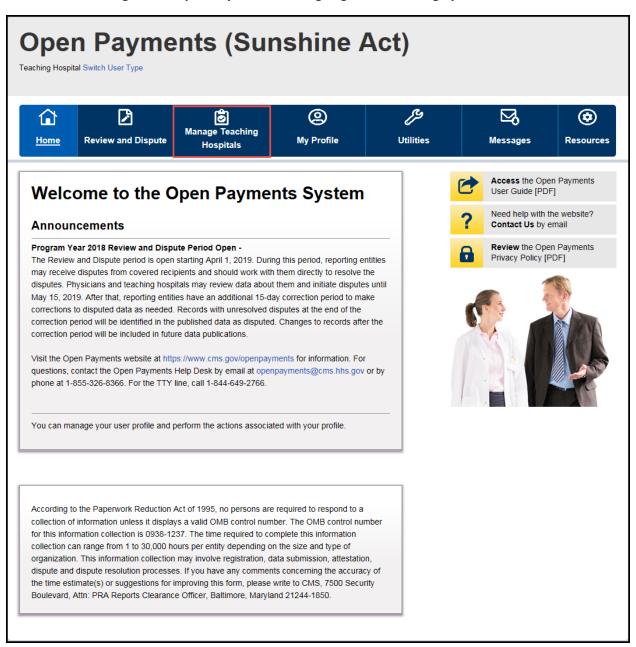


3.3h: Registering a Teaching Hospital (Returning System Users)

If you are a returning user registering an additional teaching hospital in the Open Payments system, follow the steps below.

<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM credentials and navigate to the Open Payments home page. Select the "Manage Teaching Hospitals" tab.

Figure 67: Open Payments Landing Page for Returning System Users



Step 2: From the "Manage Teaching Hospitals" tab, select, "Register New Teaching Hospital."

Open Payments (Sunshine Act) Teaching Hospital Switch User Type حجر 図 汿 മ്ര **②** Manage Teaching **Review and Dispute** My Profile **Utilities** Messages Resources **Hospitals** Access the Open Payments Manage Teaching Hospitals User Guide [PDF] Need help with the website? Below are the teaching hospitals with which you are affiliated. To view details and manage user Contact Us by email roles, select a teaching hospital from the list below. You may register a new teaching hospital by selecting the "Register New Teaching Hospital" button. Review the Open Payments Privacy Policy [PDF] Register New Teaching Hospital Your Teaching Hospitals Doing Business As (DBA) TIN: Address: Status: ABCDE Teaching Hospital 11-12312341 7500 Security Blvd., Baltimore MD 21244 Registered

Figure 68: Manage Teaching Hospitals Page

<u>Step 3:</u> Search for the teaching hospital by selecting the appropriate state, teaching hospital name, teaching hospital business address, and Taxpayer Identification Number (TIN) from the dropdowns and select "Search."

If your teaching hospital is not found, select "Register for Prior Program Year" to search for your teaching hospital in 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 3.3i.

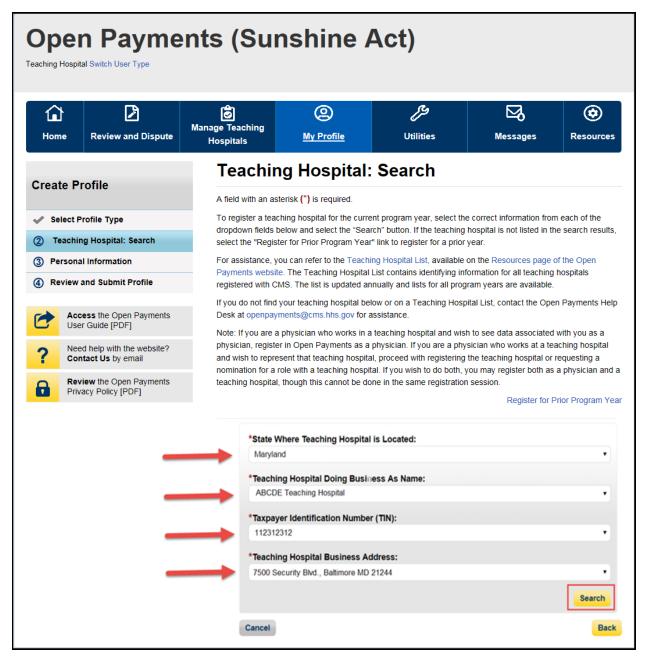
If your teaching hospital cannot be found in any program year, contact the Open Payments Help Desk at 1-855-326-8366 for assistance.

The name of the hospital selected during registration must be the hospital's "Doing Business As" name. In the CMS Teaching Hospital List, the "Doing Business As" name is under the heading of "Hospital Name." (Refer to Section 3.3i for detailed information on registering a teaching hospital for a prior program year.)

The hospital address selected must 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.

Figure 69: Teaching Hospital Search Page



<u>Step 4:</u> Review the information displayed on the page and select the "Continue" button 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.

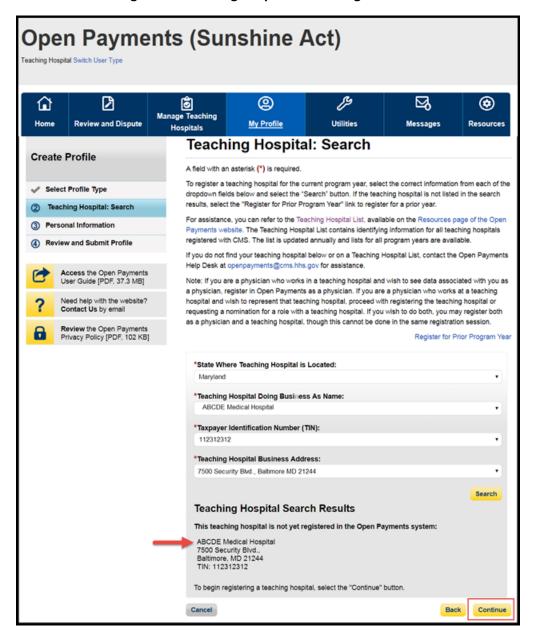
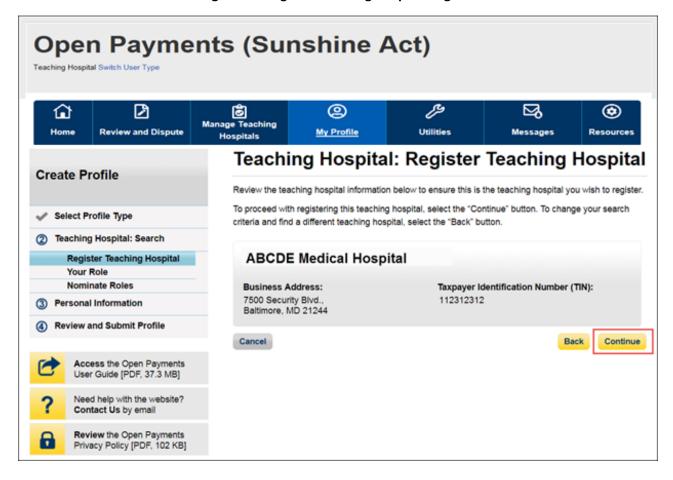


Figure 70: Teaching Hospital Search Page Results

Step 5: Review the information displayed on the page and select the "Continue" button.

Figure 71: Register Teaching Hospital Page



<u>Step 6:</u> 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 3.4c.

First name, last name, email address, and business phone should be pre-populated with information from your IDM 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 the required fields have been entered. When complete, select the "Continue" button.

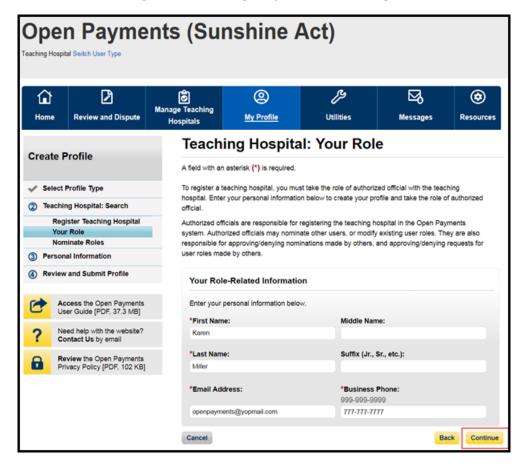


Figure 72: Teaching Hospital Your Role Page

<u>Step 7:</u> 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). If you choose not to add nominees currently, select the "Continue" button without adding any nominee information and proceed to step 8.

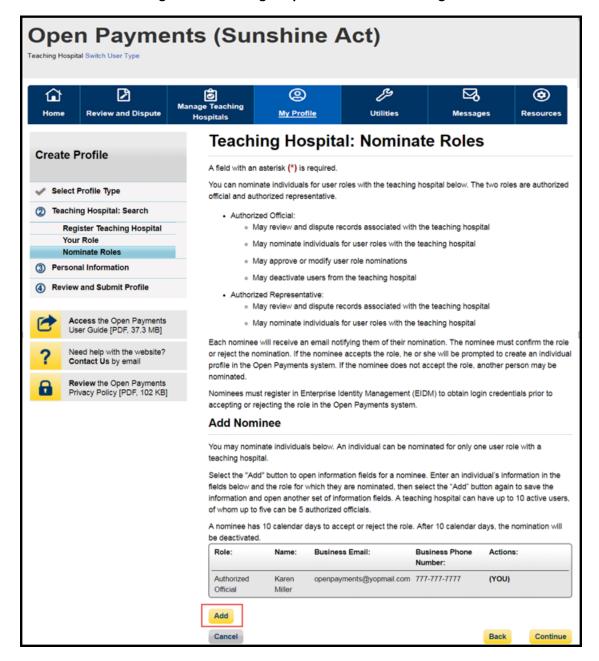


Figure 73: Teaching Hospital Nominate Roles Page

<u>Step 7a</u>: If you selected "Add," 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 3.4c. When you have entered the

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information, select "Add." This will add the nominee information to the teaching hospital's profile, as well as open another set of information fields to enter an additional nominee.

Repeat the process until you have entered all 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 the individuals you wish to nominate, select the "Continue" button.

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.

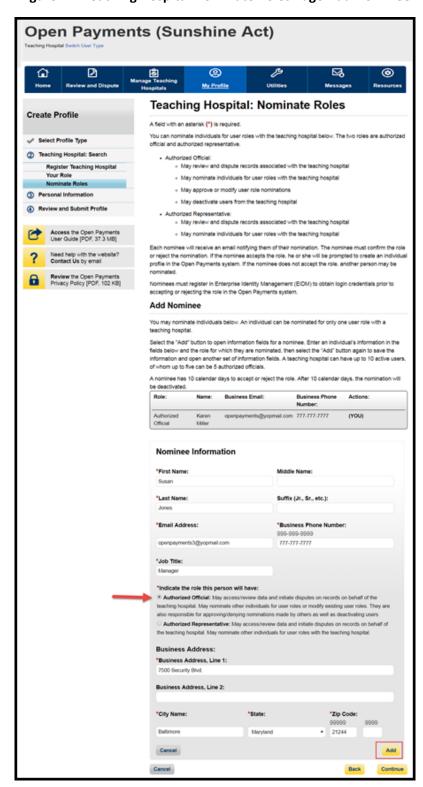
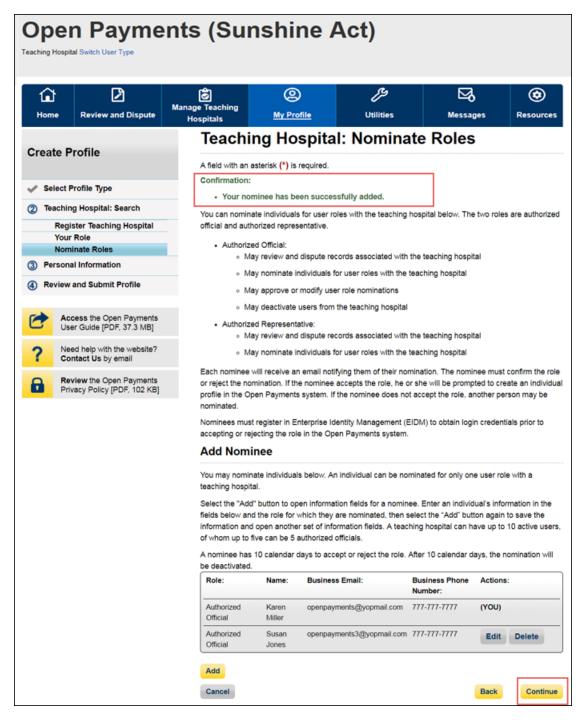


Figure 74: Teaching Hospital Nominate Roles Page Add Nominee

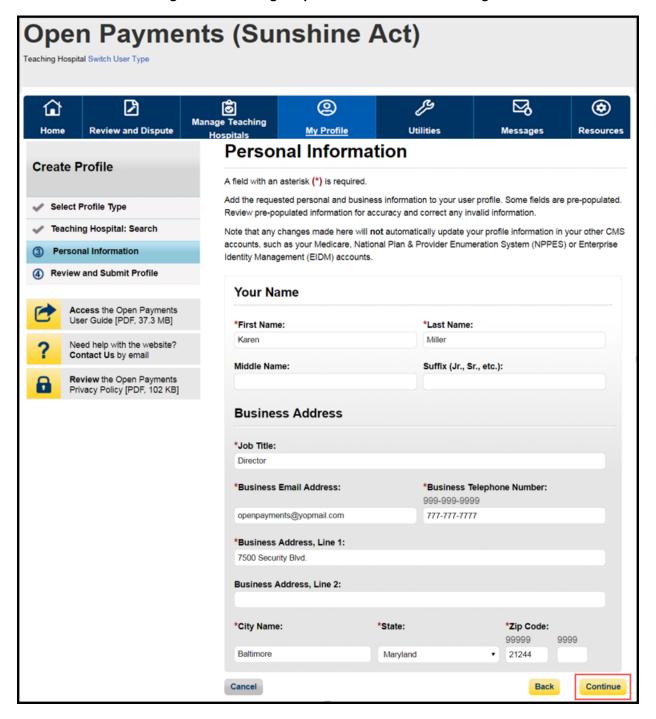
If you entered any nominees, you will see the nominee information displayed on the page. Confirm the information and when complete select the "Continue" button.

Figure 75: Teaching Hospital Nominate Roles Page with Confirmation Message



Step 8: Enter the required personal information. When finished, select the "Continue" button.

Figure 76: Teaching Hospital Personal Information Page



<u>Step 9:</u> 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 the "Continue" button.

Open Payments (Sunshine Act) Teaching Hospital Switch User Type ß Ø 図 ➌ 仚 ø Manage Teaching **Review and Dispute** My Profile **Utilities** Home Messages Resources Review and Submit Profile **Create Profile** Review the information entered in the previous sections. Select the "Back" button to navigate to the previous page(s) and correct any incorrect information. Select Select Profile Type the "Continue" button to submit your profile. Teaching Hospital: Search **ABCDE Medical Hospital** Personal Information Review and Submit Profile Teaching Hospital Business Address: 7500 Security Blvd., Baltimore, MD 21244 Access the Open Payments User Guide [PDF, 37.3 MB] Taxpayer Identification Number (TIN): 520607971 Your Role: Authorized Official Need help with the website? Contact Us by email First Name: Karen Middle Name: Suffix (Jr., Sr., etc.): Last Name: Miller Review the Open Payments Privacy Policy [PDF, 102 KB] Business Email Address: openpayments@yopmail.com Business Telephone Number: 777-777-7777 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 Last **Business Email Address: Business Telephone** Name: Name: Number: Authorized Karen Miller openpayments@yopmail.com 777-777-7777 Official Authorized openpayments3@yopmail.com 777-777-7777 Susan Official

Figure 77: Review and Submit Profile Page

Back

Continue

Cancel

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.

Open Payments (Sunshine Act) Teaching Hospital Switch User Type ß 冏 മ 罓 仚 ø ➌ **Manage Teaching** Review and Dispute Utilities Hospitals Success Confirmed Create Profile You have successfully submitted ABCDE Medical Hospital profile information You may now: Select Profile Type · Go to Open Payments Home Teaching Hospital: Search For help obtaining a PDF viewer, go to the CMS.gov Help page. Personal Information **Review and Submit Profile** Access the Open Payments User Guide [PDF, 37.3 MB] Need help with the website? Contact Us by email Review the Open Payments Privacy Policy [PDF, 102 KB]

Figure 78: Registration Confirmation Successful Page

3.3i 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.

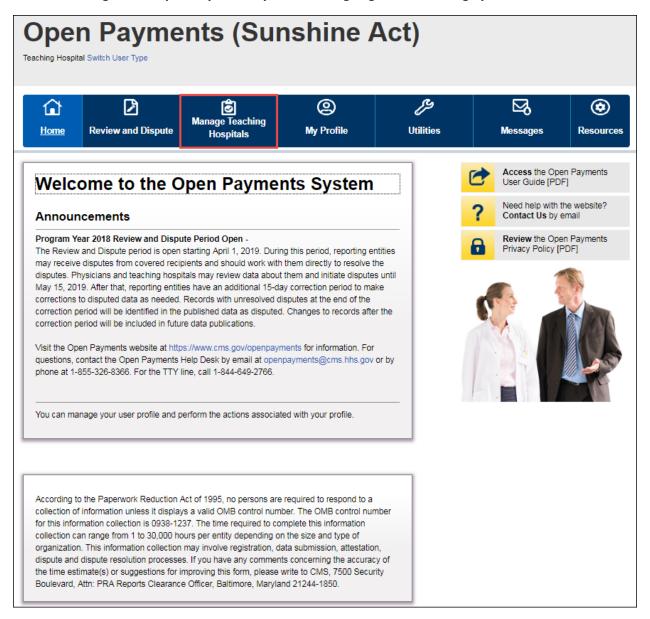
If your teaching hospital is already registered in the Open Payments system, you do not need to reregister the teaching hospital for the prior program year.

If your teaching hospital does not appear in <u>any</u> 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:

<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM credentials and navigate to the Open Payments home page. Select the "Manage Teaching Hospitals" tab.

Figure 79: Open Payments System Landing Page For Returning System Users.



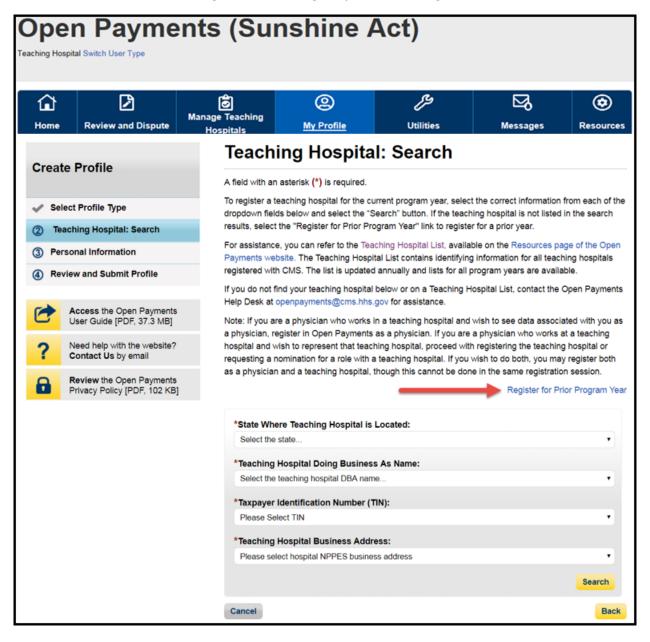
Step 2: On the "Manage Teaching Hospitals" page, select "Register New Teaching Hospital."

Figure 80: Manage Teaching Hospitals Page



Step 3: On the "Teaching Hospital: Search" page, select the link "Register for Prior Program Year."

Figure 81: Teaching Hospital Search Page



<u>Step 4</u>: 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 dropdowns 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."

The address selected should be the address listed in the CMS Teaching Hospital List as the hospital's "NPPES Business Address."

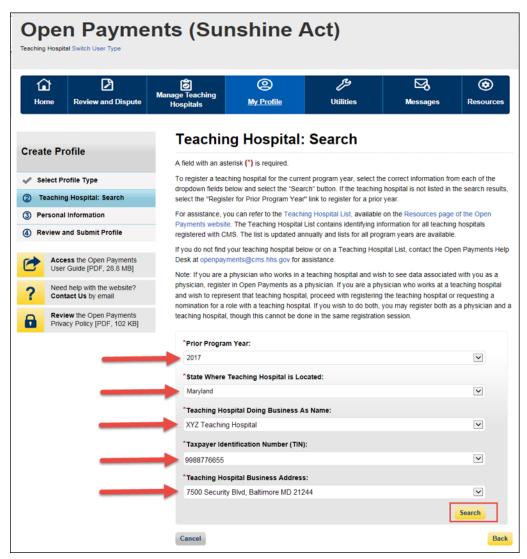


Figure 82: Teaching Hospital Search Page- Prior Program Year

<u>Step 5:</u> Review the information displayed on the page and select the "Continue" button 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.

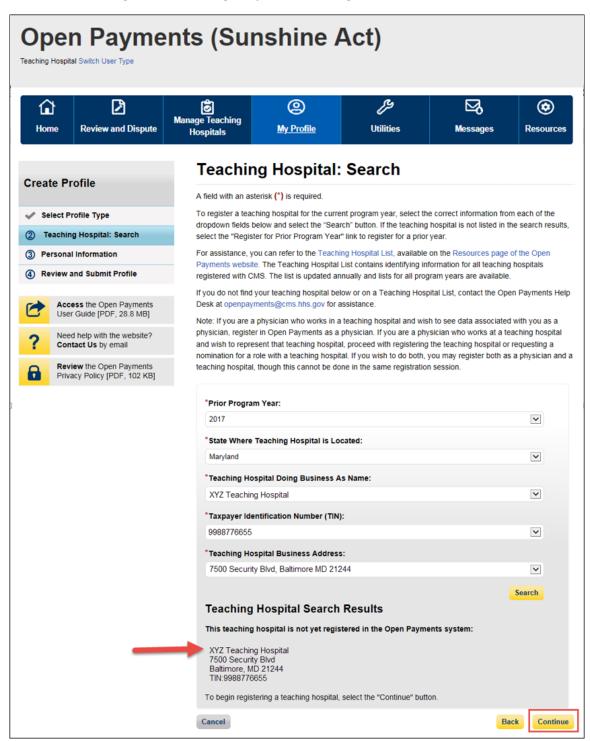
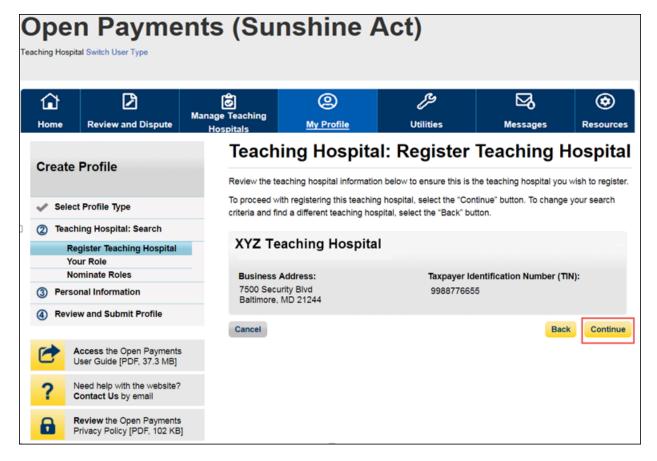


Figure 83: Teaching Hospital Search Page with Search Results

<u>Step 6:</u> Review the teaching hospital information displayed on the page. When complete, select the "Continue" button.

Figure 84: Register Teaching Hospital Page



<u>Step 7:</u> 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 3.4c.

Your first name, last name, email address, and business phone should be pre-populated with information from your IDM 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 the required fields have been entered. When complete, select the "Continue" button.

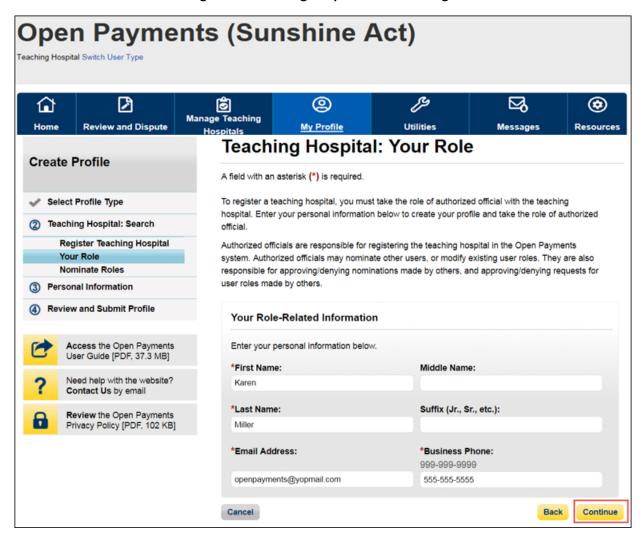
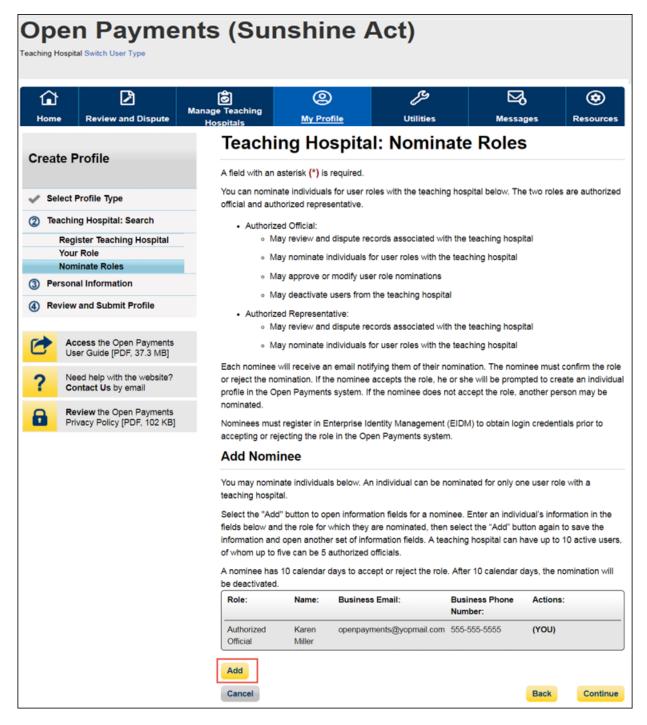


Figure 85: Teaching Hospital Your Role Page

<u>Step 8:</u> You may choose to nominate additional users to fill the authorized official or authorized representative roles. To do so, select the "Add" button to nominate any additional individual(s).

Figure 86: Teaching Hospital Nominate Roles Add Nominees



<u>Step 8a</u>: 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

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hospital user roles is available in Section 3.4c. When you have entered the information, select the "Add" button.

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 the individuals you wish to nominate, select the "Continue" button.

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.

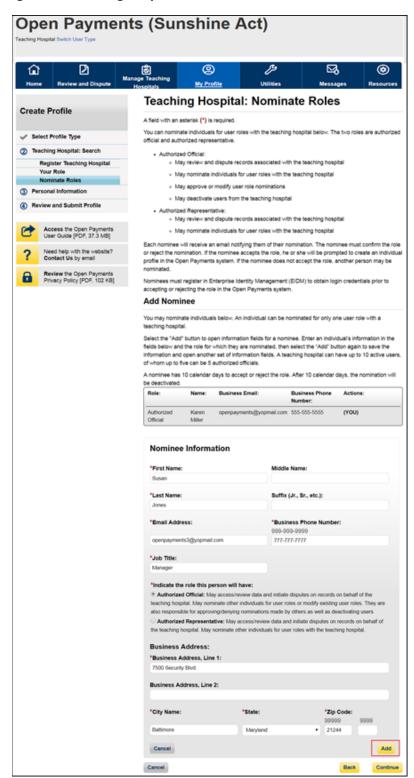


Figure 87: Teaching Hospital Nominate Roles Nominee Information

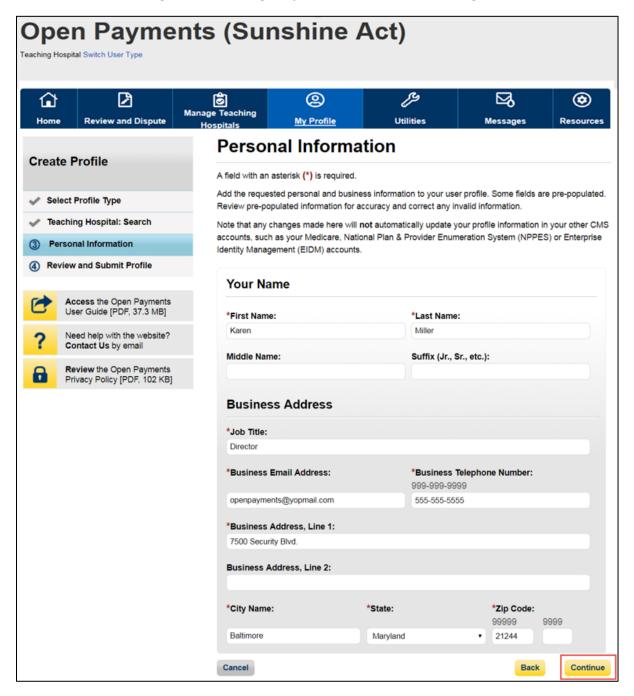
If you entered any nominees, you will see the nominee information displayed on the page. Confirm the information and when complete select the "Continue" button.

Open Payments (Sunshine Act) (a) ge Teaching ß \square 2 @ **②** My Profile Utilities Teaching Hospital: Nominate Roles **Create Profile** A field with an asterisk (*) is required. Confirmation: Select Profile Type · Your nominee has been successfully added. Teaching Hospital: Search You can nominate individuals for user roles with the teaching hospital below. The two roles are authorized Register Teaching Hospital official and authorized representative. Your Role Nominate Roles May review and dispute records associated with the teaching hospital ③ Personal Information · May nominate individuals for user roles with the teaching hospital Review and Submit Profile · May approve or modify user role nominations May deactivate users from the teaching hospital Access the Open Payments User Guide [PDF, 37.3 MB] · Authorized Representative: · May review and dispute records associated with the teaching hospital Need help with the website? · May nominate individuals for user roles with the teaching hospital Contact Us by email Each nominee will receive an email notifying them of their nomination. The nominee must confirm the role Review the Open Payments or reject the nomination. If the nominee accepts the role, he or she will be prompted to create an individual Privacy Policy [PDF, 102 KB] profile in the Open Payments system. If the nominee does not accept the role, another person may be 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 You may nominate individuals below. An individual can be nominated for only one user role with a teaching hospital. Select the "Add" button to open information fields for a nominee. Enter an individual's information in the fields below and the role for which they are nominated, then select the "Add" button again to save the information and open another set of information fields. A teaching hospital can have up to 10 active users of whom up to five can be 5 authorized officials. A nominee has 10 calendar days to accept or reject the role. After 10 calendar days, the nomination will be deactivated. Role: Business Phone Actions: Name: Business Email: openpayments@yopmail.com 555-555-5555 Official Miller Authorized Susan openpayments3@yopmail.com 777-777-7777 Edit Delete Official Add Continue Cancel Back

Figure 88: Teaching Hospital Nominate Roles Confirmation

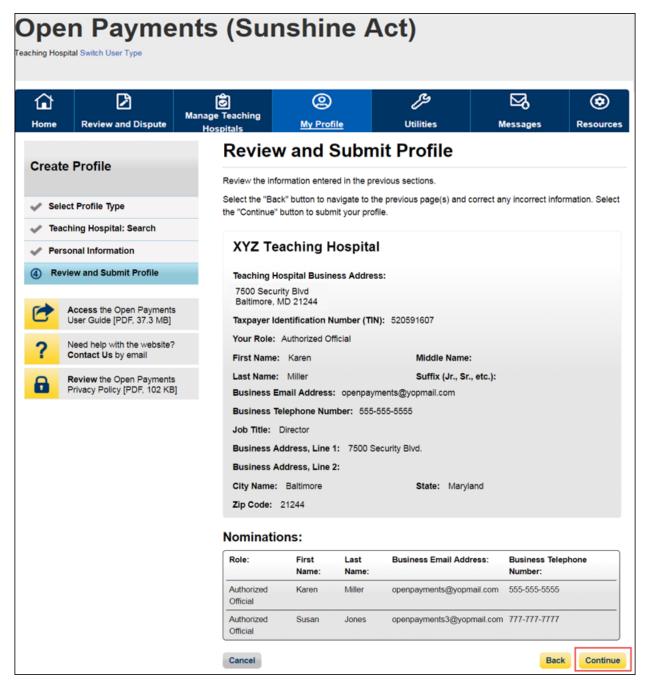
Step 9: Enter your personal information. When finished, select the "Continue" button.

Figure 89: Teaching Hospital Personal Information Page



<u>Step 10:</u> 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 the "Continue" button.

Figure 90: Review and Submit Profile



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.

Open Payments (Sunshine Act) Teaching Hospital Switch User Type B **2 @** 罓 ➌ 仚 Ö Manage Teaching Home **Review and Dispute** My Profile Utilities Messages Resources Hospitals Success Confirmed **Create Profile** You have successfully submitted XYZ Teaching Hospital profile information You may now: Select Profile Type . Go to Open Payments Home Teaching Hospital: Search For help obtaining a PDF viewer, go to the CMS.gov Help page. Personal Information **Review and Submit Profile** Access the Open Payments User Guide [PDF, 37.3 MB] Need help with the website? Contact Us by email Review the Open Payments Privacy Policy [PDF, 102 KB]

Figure 91: Registration Confirmation Successful

3.3j: Using the Switch User Functionality

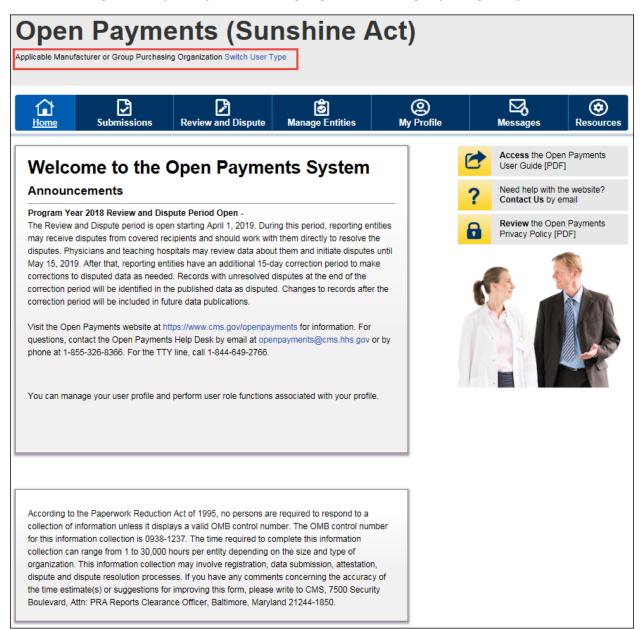
The Open Payments system allows you to hold multiple user roles based on your affiliations with multiple entities. You can switch among the applicable manufacturer/applicable GPO, physician, and teaching hospital user types through a "Switch User Type" functionality. Once you have successfully registered 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:

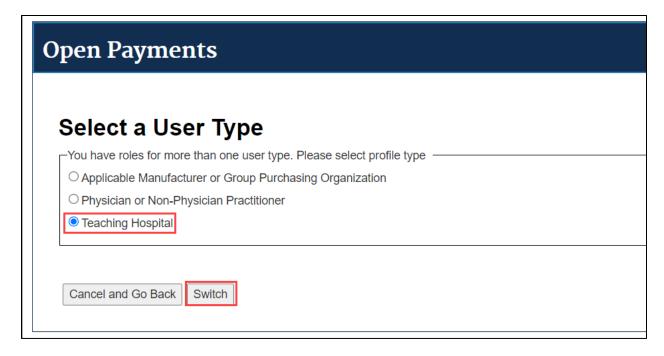
Step 1: At the very top of the page, select "Switch User Type."

Figure 92: Open Payments Landing Page For Returning Reporting Entity User



<u>Step 2:</u> 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."

Figure 93: Select User Type Page



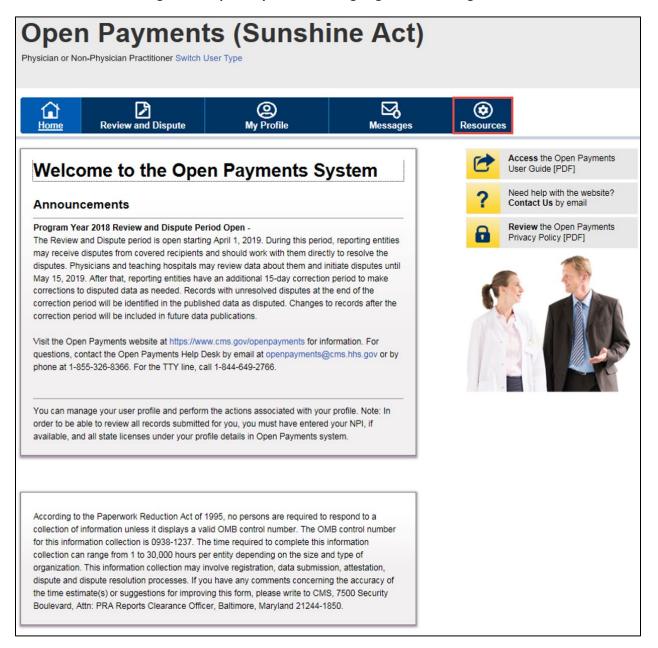
<u>Step 3:</u> If you are not currently assigned a role for the selected user type, you will be prompted to create a profile. Select the "Create My Profile" button to begin that process.

Figure 94: Open Payments Landing Page For First-Time User



<u>Step 3a</u>: 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.

Figure 95: Open Payments Landing Page for Returning User



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 Open Payments User Guide for Reporting Entities or Open Payments User Guide for Covered Recipients.

Section 3.4: Open Payments Users and User Roles

There are two user roles available for individuals associated with physicians, NPPs or teaching hospitals: authorized officials or authorized representatives.

3.4a: 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.

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 covered recipient profile and records information.
- 2. **Modify Profile:** Able to edit or enter the covered recipient'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 96: Physician User Roles and User Role Functions

| User Role | Function |
|-----------|---|
| Physician | Registers him- or herself in the Open Payments system |
| | Nominates an authorized representative |
| | Has full access to review and dispute records |
| | Views and download system generated email messages |
| | |

| User Role | Function |
|----------------|---|
| Authorized | Physician can grant one or more of the following access levels: |
| Representative | Read-only: (default) Able to see covered recipient profile and records information |
| | Modify Profile: Able to edit or enter a covered recipient's "My Profile" information (NPI, license, specialties, etc.) |
| | Dispute Records: Able to dispute records related to the covered recipient submitted by reporting entities |
| | Access levels are separate; having "dispute records" access does not automatically include "modify profile" access, or vice versa |
| | Views and download system generated email messages |

3.4b: NPP User Roles

A NPP may designate **one authorized representative** within the Open Payments system to take certain actions on their behalf. This person can be another NPP, an office manager, a practice manager, or another person the NPP would like to designate to interface with the Open Payments system on his or her behalf. A NPP cannot be his or her own authorized representative.

The NPP 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:

- 4. Read: Default access level. Able to see covered recipient profile and records information.
- 5. **Modify Profile:** Able to edit or enter the covered recipient's My Profile information (NPI, license, specialties, etc.).
- 6. **Dispute Records:** Able to dispute reported payments or other transfers of value.

Figure 97: NPP User Roles and User Role Functions

| Function |
|---|
| Registers him- or herself in the Open Payments system |
| Nominates an authorized representative |
| Has full access to review and dispute records |
| Views and download system generated email messages |
| |

| User Role | Function |
|----------------|---|
| Authorized | NPP can grant one or more of the following access levels: |
| Representative | Read-only: (default) Able to see covered recipient profile and records information |
| | Modify Profile: Able to edit or enter a covered recipient's "My Profile" information (NPI, license, specialties, etc.) |
| | Dispute Records: Able to dispute records related to the covered recipient submitted by reporting entities |
| | Access levels are separate; having "dispute records" access does not automatically include "modify profile" access, or vice versa |
| | View and download system generated email messages |

3.4c: Teaching Hospital User Roles

Teaching hospitals can have up to 10 unique users holding the role of either an 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, NPP, 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 the figure below.

Figure 98: Teaching Hospital User Roles and User Role Functions

| User Role | Function |
|------------------------|---|
| Authorized Official | Registers with the teaching hospital in the Open Payments system Nominates other users and modifies existing user roles Approves or modifies nominations made by others and requests for user roles made by others, including self-nominations Removes user roles from other users Reviews and disputes records associated with the teaching hospital Views and download system generated email messages |

| User Role | Function |
|----------------|---|
| Authorized | Reviews and disputes records associated with the teaching hospital |
| Representative | Nominates other individuals for user roles with teaching hospital (nominations must be confirmed by an authorized official) |
| | Views and download system generated email messages |

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 3.5: Nominations

The nomination process allows you to assign specific roles to individuals to act on behalf of a physician, NPP, or a teaching hospital. Physicians and NPPs 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 1-855-326-8366 to complete the registration.

Individuals may not self-nominate to serve on behalf of physicians and NPPs. The physician or NPP 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 and NPP 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 IDM 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 expired 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 authorized official will receive an email notification of the nomination rejection.

Note: Nominees will need to have IDM credentials 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, an expired nomination notification will be sent to the nominee. **Figure 108** shows the five steps in the nomination acceptance process.

Log in to Open Payments

Enter Confirm or Reject Registration and Nomination ID Nomination

[If Confirmed] Review and Submit Registration Registration Registration Registration Registration Registration Registration

Figure 99: Accepting Nominations Process

Users can also be deactivated from a teaching hospital. Deactivation removes an individual's association with a teaching hospital in the Open Payments system, including removing the individual's access to that teaching hospital's information and records. It does not remove the individual from the Open Payments system.

In the "My Profile" page of the Open Payments system, user roles are listed with a status. An explanation of those statuses is in the table below.

| User Role Status | Meaning |
|------------------------------------|--|
| Nominated | The individual has been nominated for a user role with the teaching hospital or physician or NPP |
| Declined | The individual declined the nomination for the user role |
| Accepted | The individual accepted the nomination for the user role |
| Requested (teaching hospital only) | An individual has self-nominated for a user role with a teaching hospital |

Figure 100: User Role Statuses for Physicians, NPPs, and Teaching Hospitals

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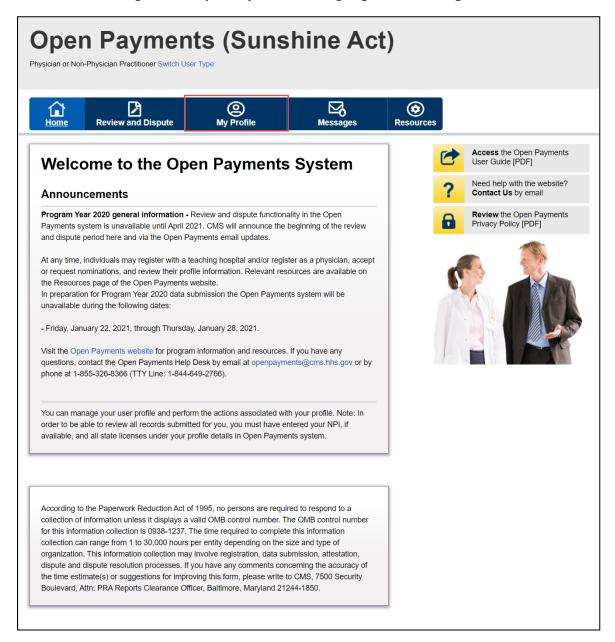
| Approved (teaching hospital only) | The individual's self-nomination for the user role has been approved by an authorized official with the teaching hospital |
|--|---|
| Vetted (physician and NPP only) | The physician or NPP has successfully completed the vetting process |
| Pending Vetting (physician and NPP only) | The physician or NPP has not yet undergone the vetting process |
| Vetting In Progress (physician and NPP only) | The physician or NPP is undergoing the vetting process |
| Failed Vetting (physician and NPP only) | The physician or NPP has not yet undergone the vetting process |

3.5a: Nominating an Authorized Representative (Returning System Users)

If you are a physician or NPP that did not delegate an authorized representative during initial registration, follow the steps below to nominate an individual for that role.

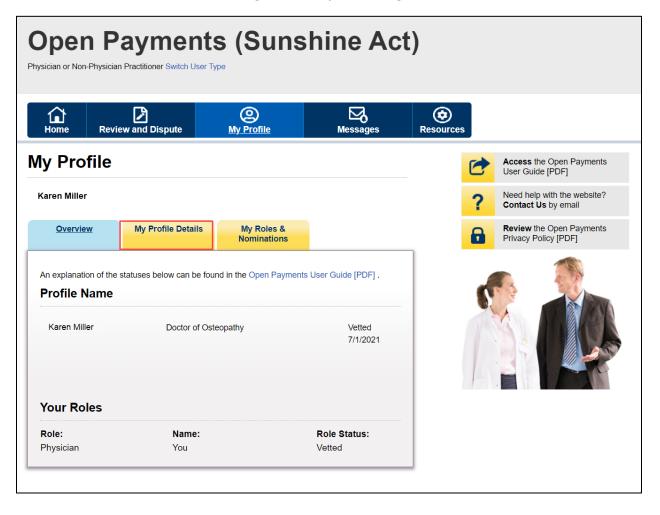
<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM credentials and navigate to the Open Payments home page, and select the "My Profile" tab.

Figure 101: Open Payments Landing Page For Returning User



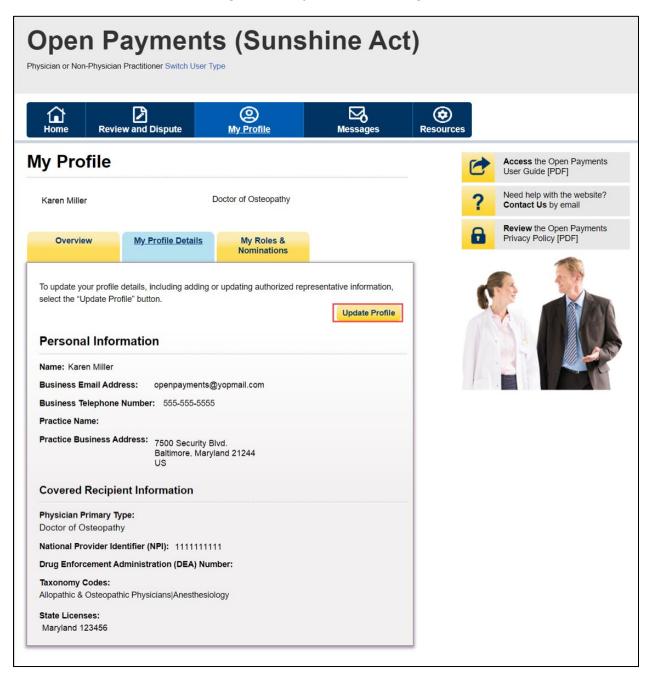
Step 2: From the "My Profile Overview" tab, select the "My Profile Details" tab.

Figure 102: My Profile Page



Step 3: On this page, you will be able to view your profile information. Select "Update Profile."

Figure 103: My Profile Details Page



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<u>Step 4:</u> 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 or NPP taxonomy codes. See Section 3.6 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 3.4. When complete, select "Save Updates."

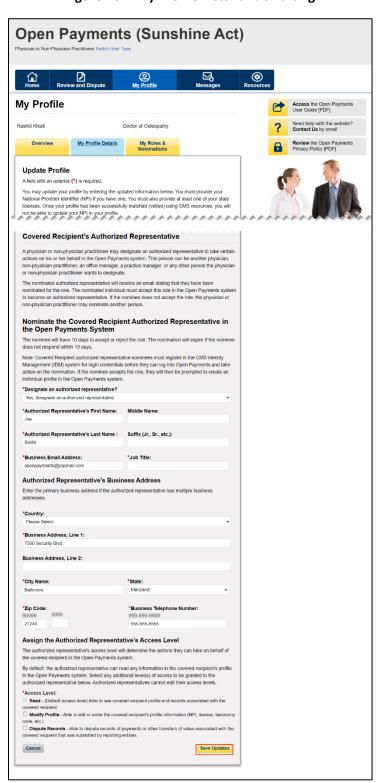


Figure 104: My Profile Details Tab Editing

<u>Step 5:</u> 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.

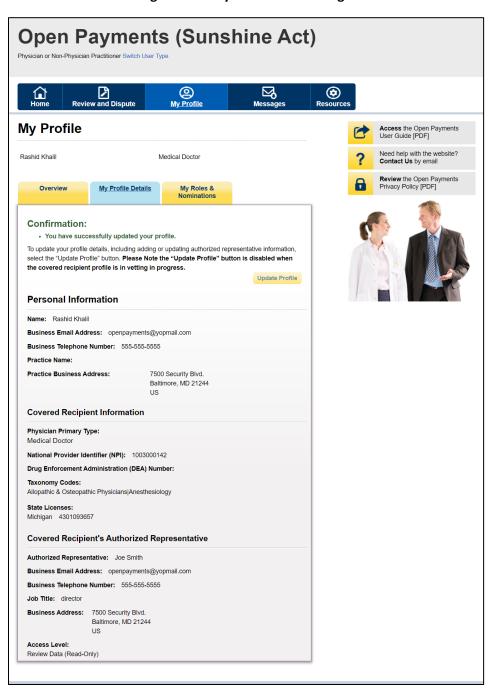


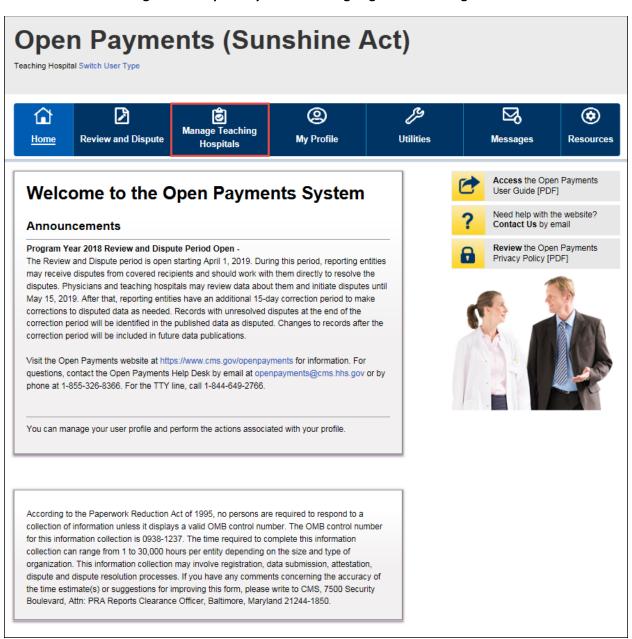
Figure 105: My Profile Details Page

3.5b: 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, NPP, an office manager, a practice manager, or any person the teaching hospital would like to designate.

<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM credentials and navigate to the Open Payments home page, and select the "Manage Teaching Hospitals" tab.

Figure 106: Open Payments Landing Page for Returning User



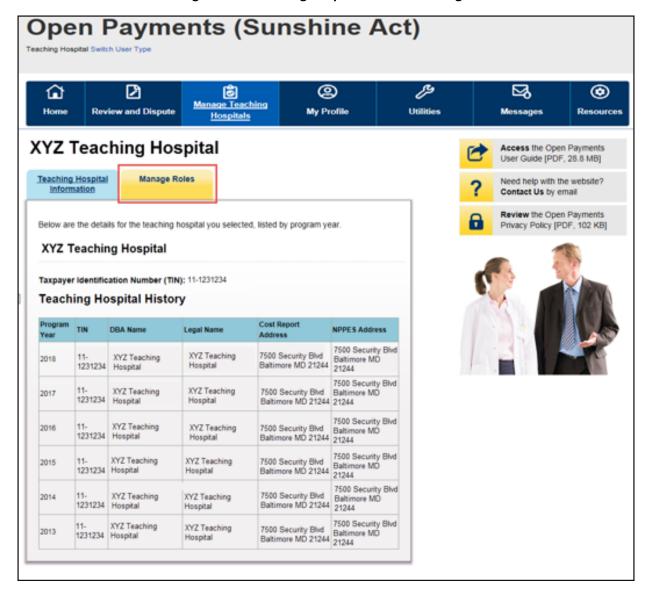
<u>Step 2:</u> Select the teaching hospital for which you wish to nominate a new role.

Figure 107: Manage Teaching Hospitals Page



Step 3: Select the "Manage Roles" tab.

Figure 108: Teaching Hospital Information Page



Step 4: Select the "Nominate New Role" button.

Figure 109: Manage Teaching Hospital Manage Roles Tab



<u>Step 5:</u> 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 the "Send Nomination" button.

Open Payments (Sunshine Act) മ פציק 罓 2 ➌ **1 Review and Dispute** My Profile Home Utilities Messages Resources Hospitals XYZ Teaching Hospital Access the Open Payments User Guide [PDF, 37.3 MB] Teaching Hospital Manage Roles Need help with the website? Contact Us by email Information Review the Open Payments Nominate New Role Privacy Policy [PDF, 102 KB] 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: Susan *Last Name: Suffix (Jr., Sr., etc.): Jones *Email Address: *Business Phone: 999-999-9999 openpayments7@yopmail.com 333-333-3333 *Indicate the role this person will have: Authorized Official: May access/review data and initiate disputes on records on behalf of the teaching hospital. May nominate other individuals for user roles or modify existing user roles. They are also responsible for approving/denying nominations made by others as well as deactivating users @ Authorized Representative: May access/review data and initiate disputes on records on behalf of the teaching hospital. May nominate other individuals for user roles with the teaching hospital **Business Address** Business Address, Line 1: 7500 Security Blvd Business Address, Line 2: Zip Code: City Name: State: 99999 9999 Baltimore Maryland ▼ 21244 Cancel **Send Nomination**

Figure 110: Teaching Hospital Manage Roles Tab Nominate Roles

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.

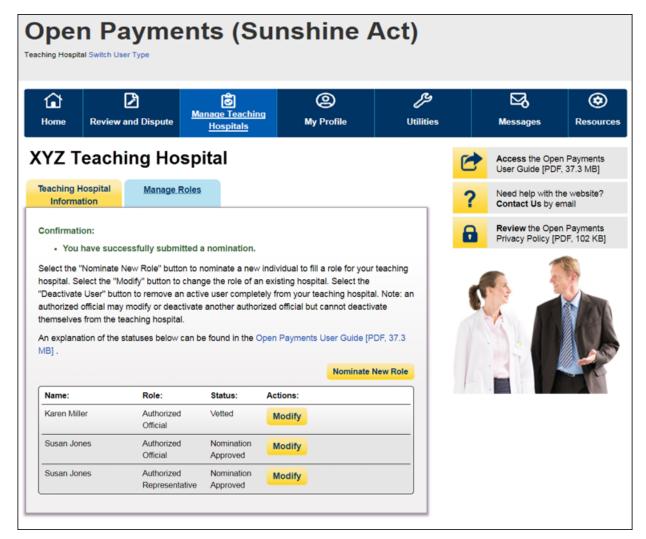


Figure 111: Teaching Hospital Manage Roles Tab Confirmation

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.

3.5c: Accepting or Rejecting a Nomination (Authorized Representative – First-Time Users)

If you have been nominated for a physician and/or NPP authorized representative role, you will receive a notification email containing instructions and important information needed to accept your nomination. You will have 10 calendar days to accept or reject the nomination. If you have not taken action on your nomination within 10 days, the nomination will expire. Follow the steps below to accept the nomination.

<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM 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.

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.

Access the Open Payments
User Guide [PDF, 37.3 MB]

Create
My Profile

Review the Open Payments

Privacy Policy [PDF, 102 KB]

Figure 112: Open Payments Landing Page for First-Time System Users

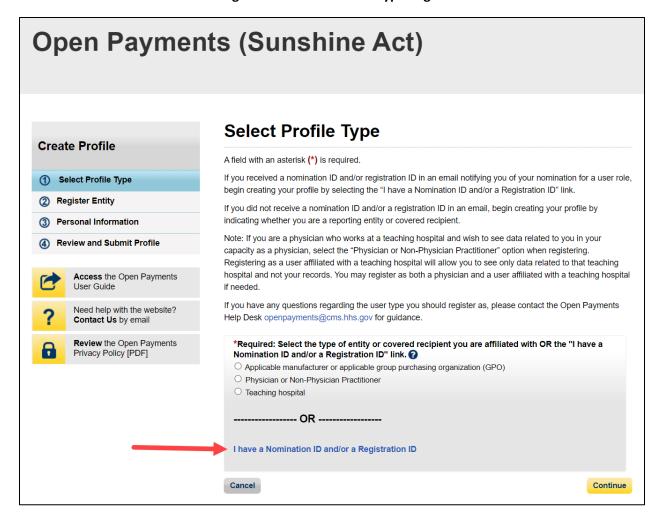
<u>Step 2:</u> The on-screen text contains important information regarding creating the physician, NPP, and individual profiles. Read the on-screen text and select the link to the quick reference guide "Required Fields for Registration" for a list of information required during registration. Select "Start Profile" at the bottom of the page when you are ready to continue.



Figure 113: Create My Profile Page

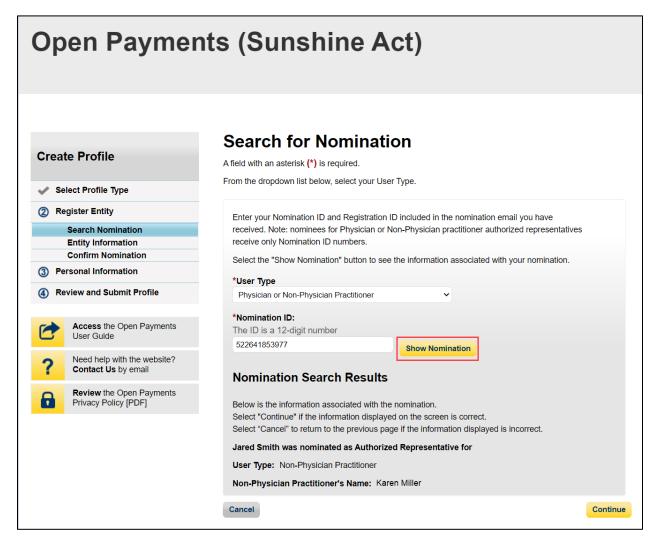
<u>Step 3:</u> Although you are affiliating with a physician or NPP, do not select "Physician or Non-Physician Practitioner" on the "Select Profile Type" page. Instead, select the "I have a Nomination ID and/or a Registration ID" link at the bottom of the page.

Figure 114: Select Profile Type Page



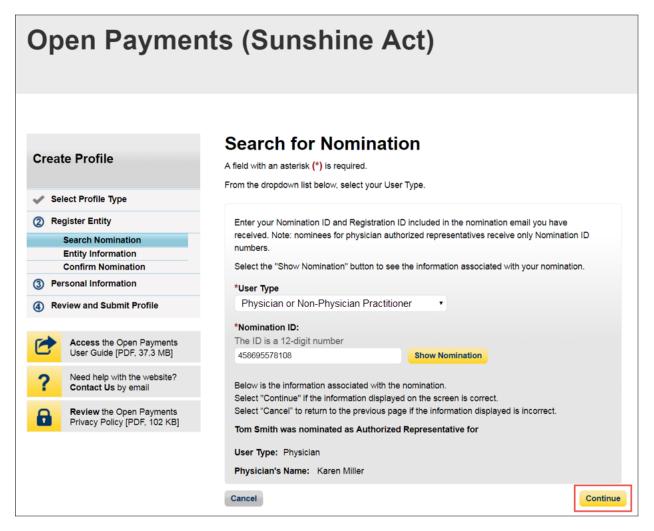
<u>Step 4:</u> Select the User Type "Physician or Non-Physician Practitioner." Enter the nomination ID included in the nomination notification email you received and then select the "Show Nomination" button.

Figure 115: Search for Nomination Page



<u>Step 5:</u> Review the nomination information displayed. If the information is correct, select the "Continue" button. If the information is incorrect, select the "Cancel" button and contact the nominator directly.

Figure 116: Search for Nomination Page With Nomination Shown



<u>Step 6:</u> Review the physician or NPP information displayed on the page. You will not be able to edit the information. Ensure that this is the physician or NPP for which you want to accept the user role nomination. If it is not the correct physician or NPP, either select the "Back" button at the bottom of the page to return to the previous page to correct the information you have entered or select the "Cancel" button to end the acceptance process.

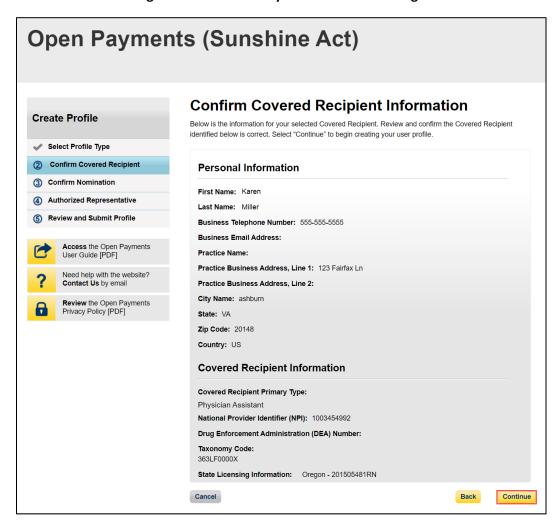


Figure 117: Confirm Physician Information Page

<u>Step 7:</u> 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.

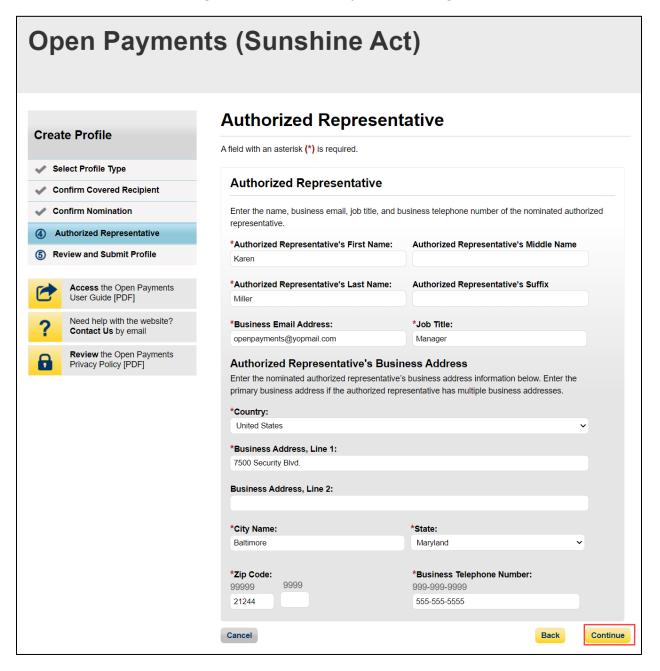
If you reject the role for which you have been nominated, select the "Continue" button after selecting "No, I do not accept" for the role. The system will ask you if you are sure you want to reject this role. If you confirm your choice to reject the role, you will exit the system and the nominator will 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) Confirm Nomination Create Profile A field with an asterisk (*) is required. Confirm the user role by either accepting or rejecting the nomination. Select the appropriate option below. Select Profile Type Then, select the "Continue" button to proceed. Confirm Physician 3 Confirm Nomination Karen Miller Authorized Representative 7500 Security Blvd Baltimore, MD 21244 (5) Review and Submit Profile Physician Primary Type: Medical Doctor National Provider Identifier (NPI): 1123456789 Access the Open Payments User Guide [PDF, 37.3 MB] Business Telephone Number: 555-555-555 *Confirm Nominations: Need help with the website? Yes. I accept the role of Authorized Representative Contact Us by email No, I do not accept Review the Open Payments Privacy Policy [PDF, 102 KB] Read - (Default access level) Able to see physician profile and records associated with the physician. Modify Profile - Able to edit or enter the physician's profile information (NPI, license, taxonomy code, etc.) Dispute Records - Able to dispute records of payments, other transfers of value, and ownership and investment interests associated with the physician that were submitted by reporting entities Continue Cancel Back

Figure 118: Confirm Nomination Page

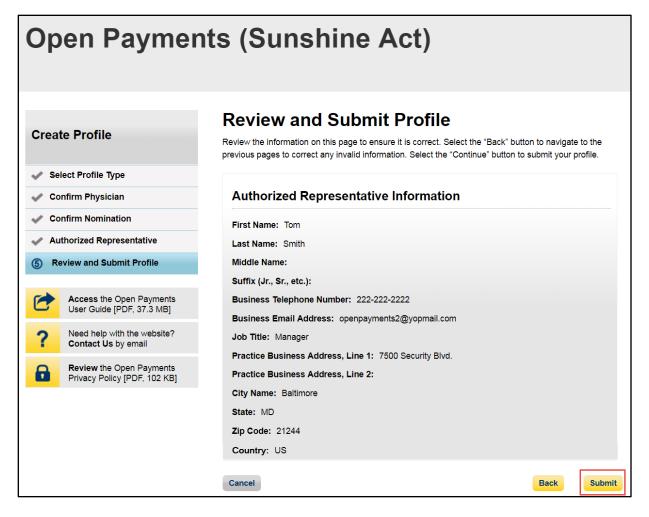
<u>Step 8:</u> Enter your personal information and select the "Continue" button.

Figure 119: Authorized Representative Page



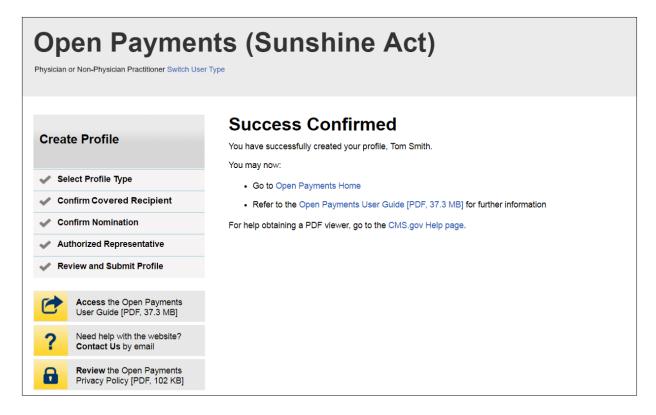
<u>Step 9:</u> Now you will be asked to review the information you have entered. To correct any errors, select the "Back" button at the bottom of the page to return to previous pages and make your corrections. If the information is correct, select the "Submit" button.

Figure 120: Review and Submit Profile Page



The following message will appear on-screen to confirm your nomination has been successfully accepted.

Figure 121: Success Confirmed Page

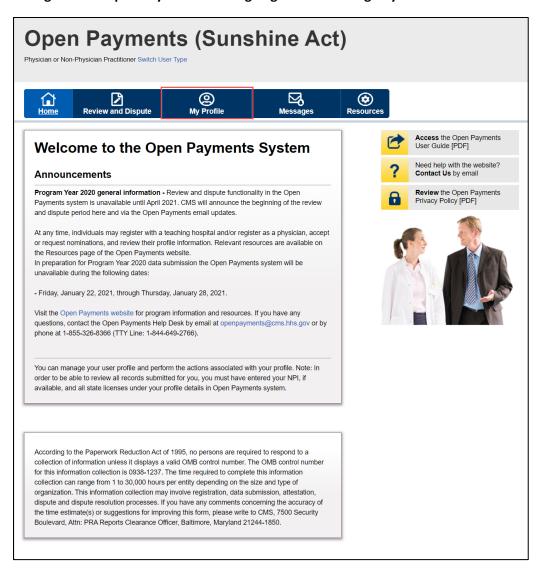


3.5d: Accepting or Rejecting a Nomination (Authorized Representative – Returning System Users)

If you have been nominated for a physician and/or a NPP 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.

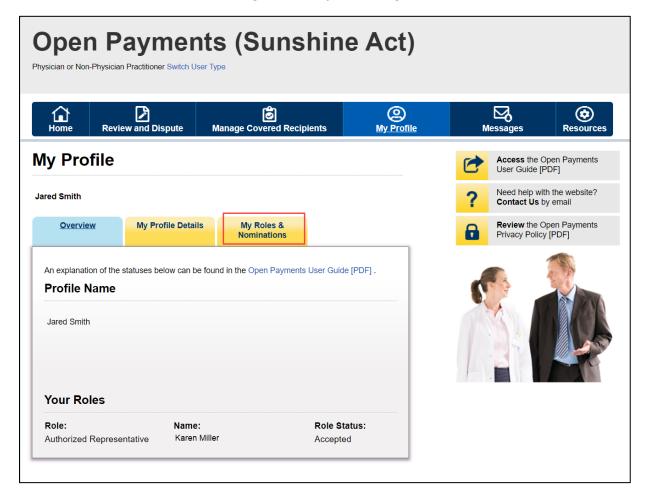
<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM credentials, navigate to the Open Payments home page, and select the "My Profile" tab from the menu bar on the Open Payments home page.

Figure 122: Open Payments Landing Page For Returning Physician or NPP User



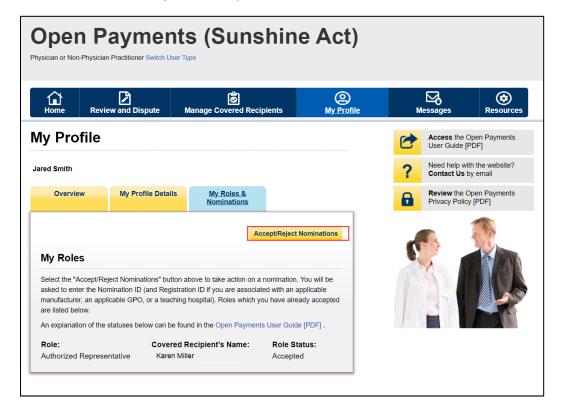
Step 2: From the "My Profile Overview" tab, select the "My Roles and Nominations" tab.

Figure 123: My Profile Page



Step 3: From the "My Roles and Nominations" tab, select "Accept/Reject Nominations."

Figure 124: My Roles and Nominations Tab



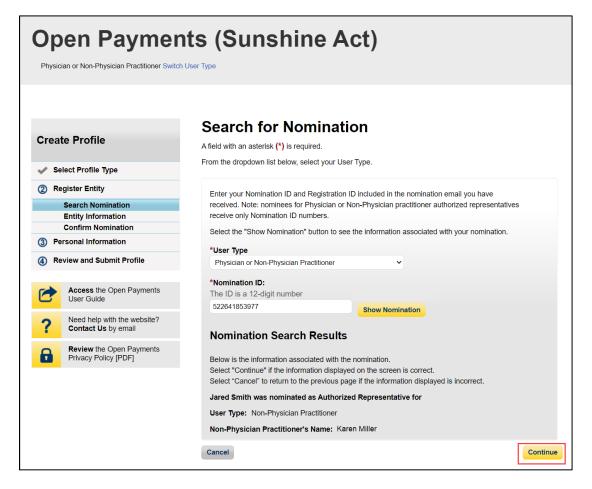
<u>Step 4:</u> The "User Type" should be pre-populated with "Physician or Non-Physician Practitioner." Enter the nomination ID provided in the nomination notification email you received and then select "Show Nomination."

Open Payments (Sunshine Act) Physician or Non-Physician Practitioner Switch User Type Review and Dispute Manage Covered Recipients Home Resources **Search for Nomination Create Profile** A field with an asterisk (*) is required. From the dropdown list below, select your User Type. Select Profile Type Register Entity Enter your Nomination ID and Registration ID included in the nomination email you have Search Nomination received. Note: nominees for Physician or Non-Physician practitioner authorized representatives Entity Information receive only Nomination ID numbers. **Confirm Nomination** Select the "Show Nomination" button to see the information associated with your nomination. ③ Personal Information Review and Submit Profile Physician or Non-Physician Practitioner *Nomination ID: Access the Open Payments User Guide The ID is a 12-digit number 522641853977 Show Nomination Need help with the website? Contact Us by email **Review** the Open Payments Privacy Policy [PDF] Cancel

Figure 125: Search for Nomination Page

<u>Step 5:</u> Review the nomination information displayed. If the information is correct, select the "Continue" button. If the information is incorrect, select the "Cancel" button and contact the nominator directly.

Figure 126: Search for Nomination Page with Search Results



<u>Step 6:</u> Review the covered recipient information displayed on the page. You will not be able to edit the information. Ensure that this is the covered recipient for which you want to accept the user role nomination. If it is not the correct covered recipient, 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 the "Cancel" button to end the acceptance process.

Open Payments (Sunshine Act) Physician or Non-Physician Practitioner Switch User Type **Confirm Covered Recipient Information Create Profile** Below is the information for your selected Covered Recipient. Review and confirm the Covered Recipient identified below is correct. Select "Continue" to begin creating your user profile. Select Profile Type Confirm Covered Recipient **Personal Information** 3 Confirm Nomination First Name: Karen Authorized Representative Last Name: Miller 6 Review and Submit Profile Business Telephone Number: 555-555-555 **Business Email Address:** Access the Open Payments Practice Name: User Guide [PDF] Practice Business Address, Line 1: 7500 Security Blvd. Need help with the website? Contact Us by email Practice Business Address, Line 2: City Name: Review the Open Payments Privacy Policy [PDF] **Z**ip Code: 21244 Country: US **Covered Recipient Information Covered Recipient Primary Type:** Physician Assistant National Provider Identifier (NPI): 1003454992 Drug Enforcement Administration (DEA) Number: Taxonomy Code: 363LF0000X State Licensing Information: Oregon - 201505481RN

Figure 127: Confirm Covered Recipient Information Page

Back

Continue

Cancel

<u>Step 7:</u> 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 the "Continue" button, you will continue the nomination confirmation process.

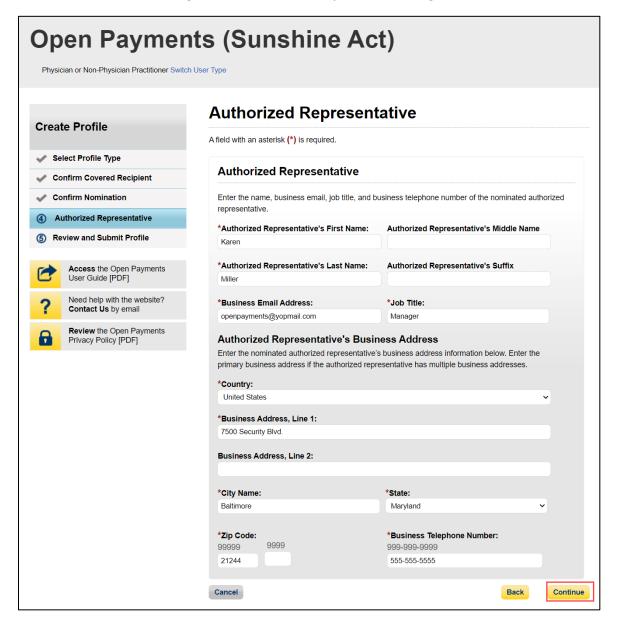
If you reject the role for which you have been nominated, select the "Continue" button after selecting "No, I do not accept" for the role. The system will ask you if you are sure you want to reject this role. If you confirm your choice to reject the role, you will exit the system and the nominator will 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 or Non-Physician Practitioner Switch User Type Confirm Nomination **Create Profile** 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 Profile Type select the "Continue" button to proceed. Confirm Covered Recipient Karen Miller 3 Confirm Nomination Authorized Representative 7500 Security Blvd. Baltimore, Maryland 21244 Review and Submit Profile Covered Recipient Primary Type: Access the Open Payments User Guide [PDF] Physician Assistant National Provider Identifier (NPI): 1003454992 Need help with the website? Contact Us by email Business Telephone Number: 555-555-5555 *Confirm Nominations: Review the Open Payments Yes, I accept the role of Authorized Representative Privacy Policy [PDF] O No, I do not accept Read - (Default access level) Able to see covered recipient profile and records associated with the Modify Profile - Able to edit or enter the covered recipient's profile information (NPI, license, taxonomy code, etc.) Dispute Records - Able to dispute records of payments or other transfers of value associated with the covered recipient that was submitted by reporting entities. Continue Cancel

Figure 128: Confirm Nomination Page

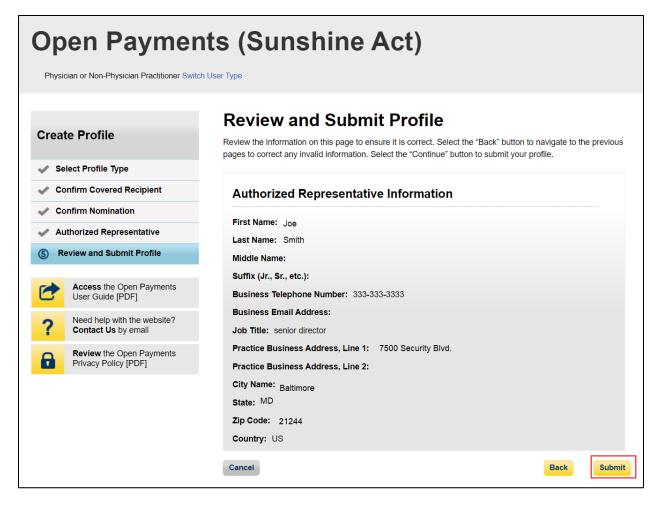
Step 8: Enter your personal information and select the "Continue" button.

Figure 129: Authorized Representative Page



<u>Step 9:</u> 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 the "Submit" button.

Figure 130: Review and Submit Profile Page



The following message will appear on-screen to confirm your nomination has been successfully accepted.

Open Payments (Sunshine Act) Physician or Non-Physician Practitioner Switch User Type and Dispute Manage Physicians (2) y Profik Resource Success Confirmed **Create Profile** You have successfully created your profile, Tom Smith. You may now: Select Profile Type · Go to Open Payments Home Confirm Covered Recipient · Refer to the Open Payments User Guide [PDF, 37.3 MB] for further information Confirm Nomination For help obtaining a PDF viewer, go to the CMS.gov Help page. Authorized Representative Review and Submit Profile Access the Open Payments User Guide [PDF, 37.3 MB] Need help with the website? Contact Us by email Review the Open Payments Privacy Policy [PDF, 102 KB]

Figure 131: Success Confirmed Page

3.5e: 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.

<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM 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.

Figure 132: Open Payments Landing Page for First-Time System Users



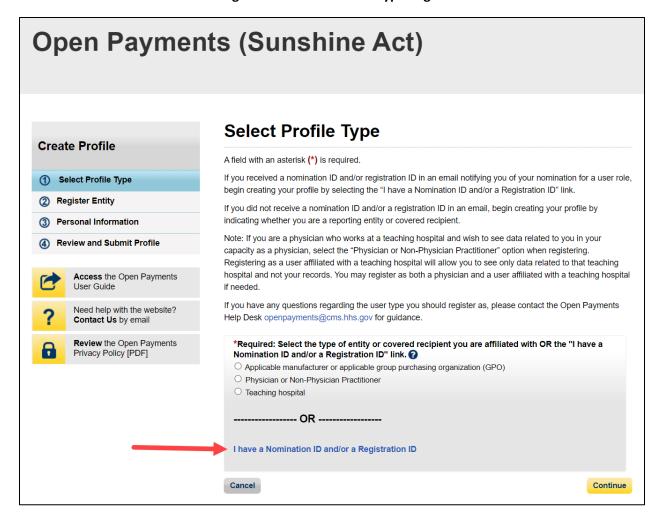
<u>Step 2:</u> The on-screen text contains important information regarding creating the physician, NPP, and individual profiles. Read the on-screen text and select the link to the quick reference guide "Required Fields for Registration" for a list of information required during registration. Select "Start Profile" at the bottom of the page when you are ready to continue.

Figure 133: Create Profile Page



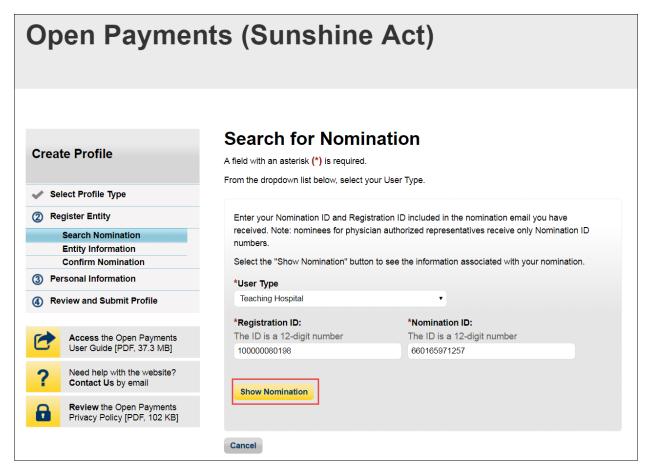
<u>Step 3:</u> On the "Select Profile Type" page, though you are affiliating with a teaching hospital, do not select "Teaching Hospital." Instead, select the link at the bottom of the page, "I have a Nomination ID and/or a Registration ID."

Figure 134: Select Profile Type Page



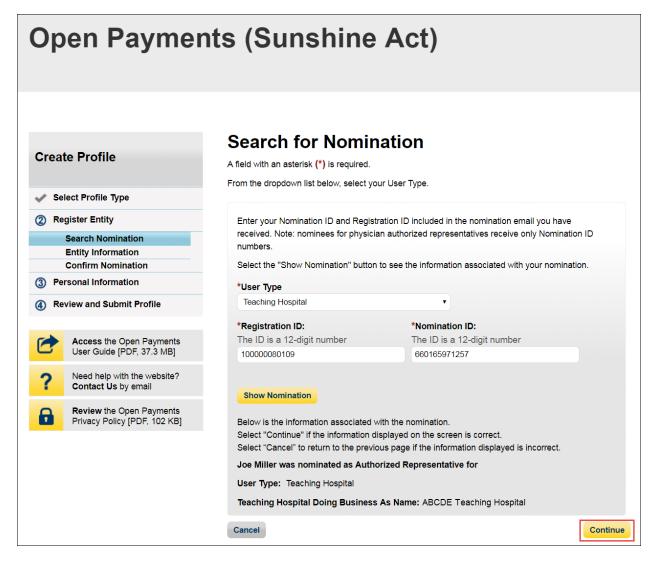
<u>Step 4:</u> Select the user type "Teaching Hospital" from the drop-down menu. Enter the registration ID and nomination ID that you received in the nomination notification email and then select "Show Nomination."

Figure 135: Search for Nomination Page



<u>Step 5:</u> Review the nomination information displayed. If the information is correct, select "Continue." If the information is incorrect, select the "Cancel" button and contact the Open Payments Help Desk at openpayments@cms.hhs.gov.

Figure 136: Search for Nomination Select Page



<u>Step 6:</u> 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.

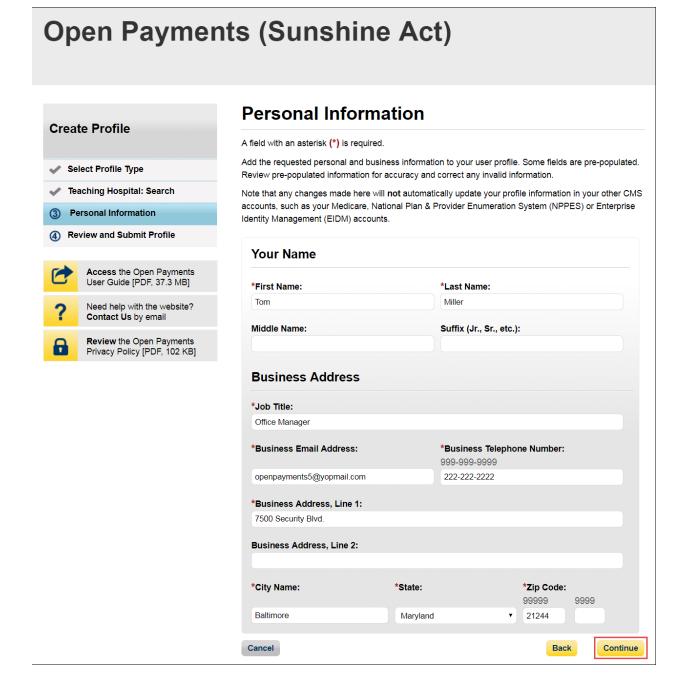
If you reject the role for which you have been nominated, select the "Continue" button after selecting "No, I do not accept" for the role. The system will ask you if you are sure you want to reject this role. If you confirm your choice to reject the role, you will exit the system and the nominator will 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) Confirm Nomination Create Profile Review the teaching hospital information below to ensure this is the teaching hospital you wish to affiliate Select Profile Type Teaching Hospital: Search XYZ Teaching Hospital Search Nomination 7500 Security Blvd Baltimore, MD 21244 Confirm Nomination 3 Personal Information TIN: 111111111 (4) Review and Submit Profile *Confirm Nomination: Yes. I accept the role of Authorized Representative: May access/review data and initiate disputes on records on behalf of the teaching hospital. May nominate other individuals for user roles with the Access the Open Payments teaching hospital. User Guide [PDF, 37.3 MB] No, I do not accept Need help with the website? Contact Us by email Back Continue Cancel Review the Open Payments Privacy Policy [PDF, 102 KB]

Figure 137: Confirm Nomination Page

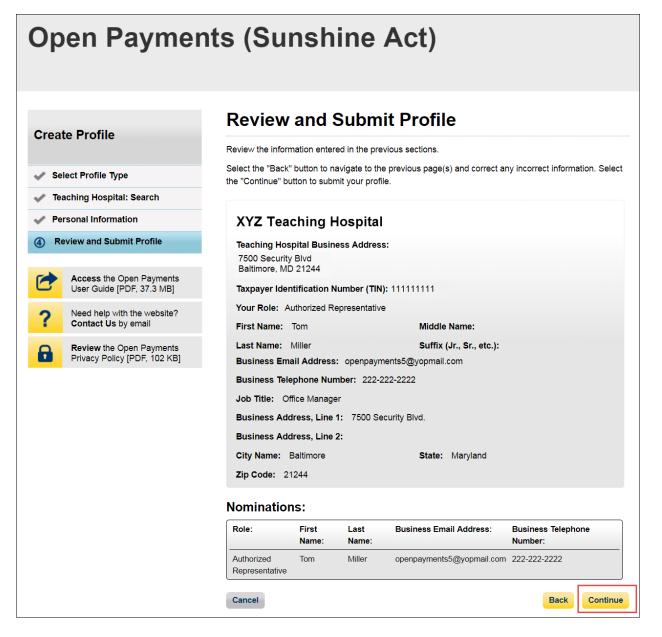
<u>Step 7:</u> Review your personal information. If the information displayed is correct, select the "Continue" button. If the information displayed is incorrect, update the necessary fields. When finished, select the "Continue" button.

Figure 138: Personal Information Page



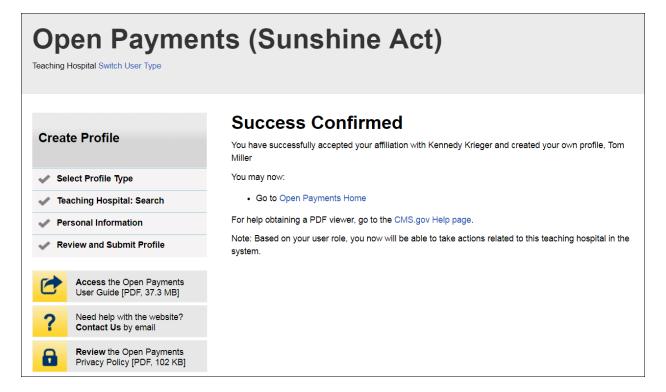
<u>Step 8:</u> Review the information you have entered. To correct any errors, select the "Back" button at the bottom of the page to return to previous pages and make your corrections. If the information is correct, select the "Continue" button.

Figure 139: Review and Submit Profile Page



The following message will appear on-screen to confirm your nomination has been successfully accepted.

Figure 140: Success Confirmed Page

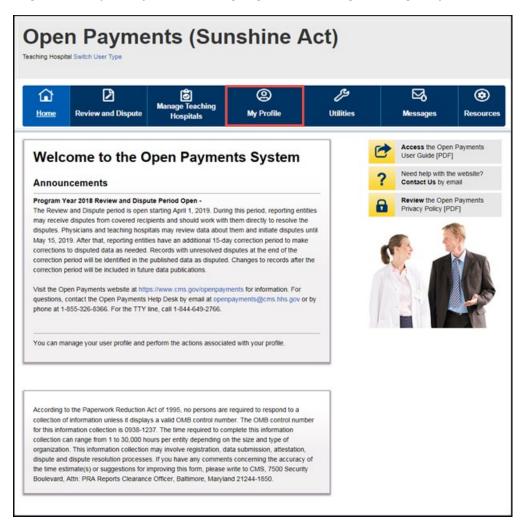


3.5f: Accepting or Rejecting a Nomination (Teaching Hospital – Returning System Users)

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.

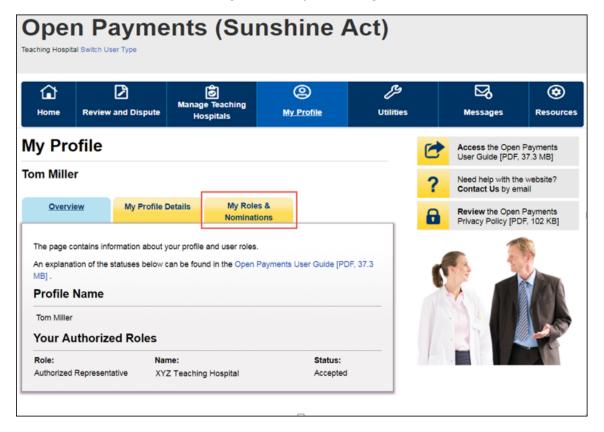
<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM credentials and navigate to the Open Payments home page. Select the "My Profile" tab.

Figure 141: Open Payments Landing Page for Returning Teaching Hospital Users.



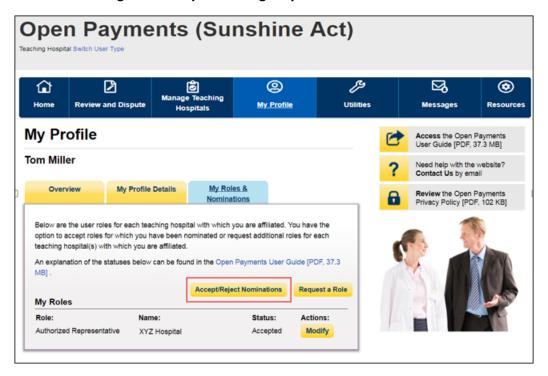
Step 2: Select "My Roles and Nominations."

Figure 142: My Profile Page



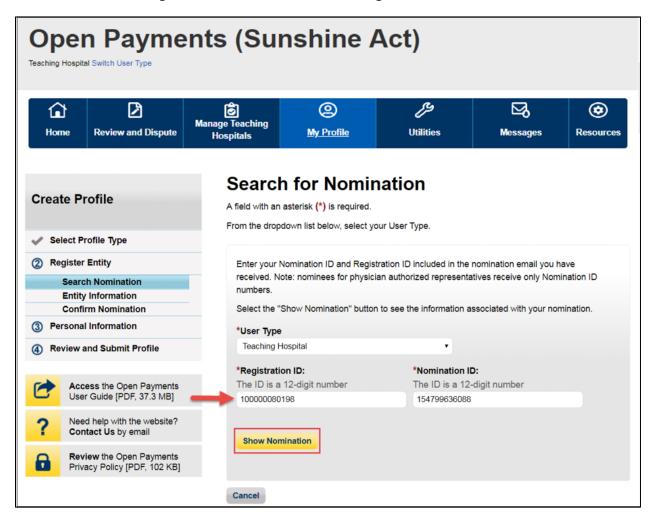
Step 3: Select "Accept/Reject Nominations."

Figure 143: My Profile Page My Roles and Nominations



<u>Step 4:</u> 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."

Figure 144: Search for Nomination Page Show Nomination



<u>Step 5:</u> Review the nomination information displayed. If the information is correct, select the "Continue" button. If the information is incorrect, select the "Cancel" button and contact the teaching hospital directly.

Open Payments (Sunshine Act) Teaching Hospital Switch User Type ß **(2**) ➌ 屲 ø Manage Teaching **Review and Dispute** Messages Home Hospitals My Profile **Utilities** Resources **Search for Nomination Create Profile** A field with an asterisk (*) is required. From the dropdown list below, select your User Type. Select Profile Type 2 Register Entity Enter your Nomination ID and Registration ID included in the nomination email you have received. Note: nominees for physician authorized representatives receive only Nomination ID **Search Nomination Entity Information** Select the "Show Nomination" button to see the information associated with your nomination. **Confirm Nomination** 3 Personal Information *User Type Teaching Hospital Review and Submit Profile *Registration ID: *Nomination ID: The ID is a 12-digit number The ID is a 12-digit number Access the Open Payments User Guide [PDF, 37.3 MB] 100000080109 660165971257 Need help with the website? Contact Us by email **Show Nomination** Review the Open Payments Privacy Policy [PDF, 102 KB] 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 previous page if the information displayed is incorrect. Joe Miller was nominated as Authorized Representative for User Type: Teaching Hospital Teaching Hospital Doing Business As Name: ABCDE Teaching Hospital Continue Cancel

Figure 145: Search for Nomination Page Continue

<u>Step 6:</u> 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 the "Continue" button, you will continue the nomination confirmation process.

If you reject the role for which you have been nominated, select the "Continue" button 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.

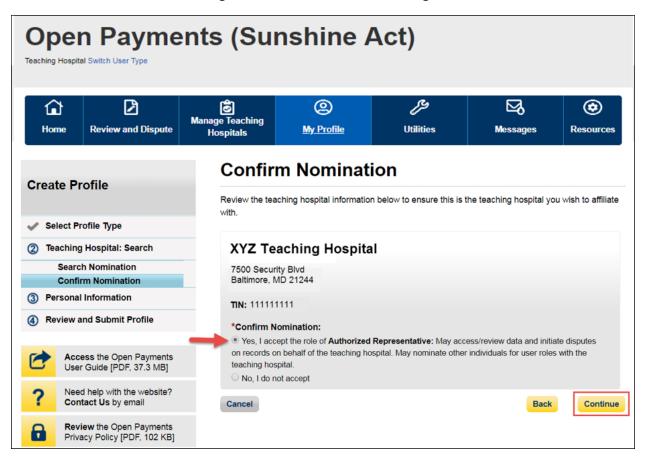
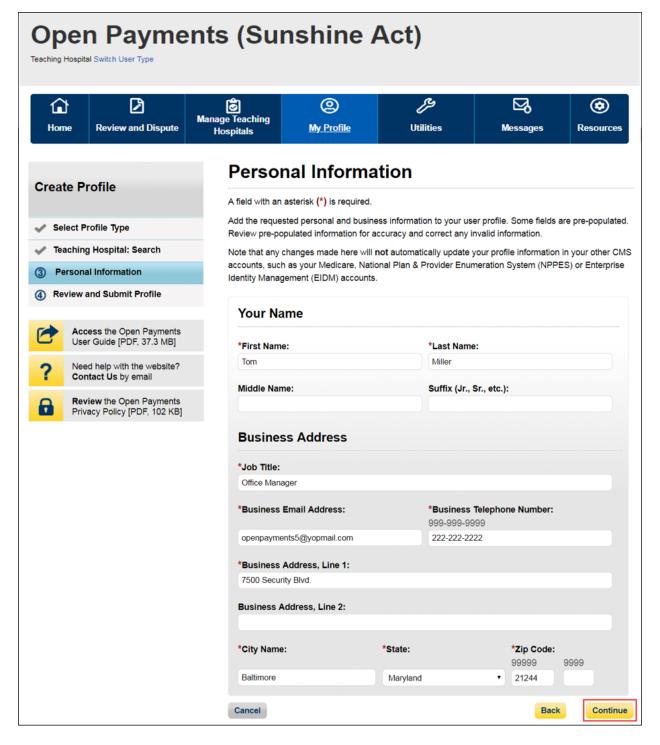


Figure 146: Confirm Nomination Page

<u>Step 7:</u> Review your personal information and enter in any additional required fields. Select the "Continue" button to proceed.

Figure 147: Personal Information Page



<u>Step 8:</u> 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 the "Continue" button.

Open Payments (Sunshine Act) Teaching Hospital Switch User Type B **(2)** \Box ſΩ 冏 ø ➌ Manage Teaching Home **Review and Dispute** My Profile **Utilities** Messages Resources Hospitals **Review and Submit Profile Create Profile** Review the information entered in the previous sections. Select the "Back" button to navigate to the previous page(s) and correct any incorrect information. Select Select Profile Type the "Continue" button to submit your profile. Teaching Hospital: Search Personal Information XYZ Teaching Hospital Review and Submit Profile Teaching Hospital Business Address: 7500 Security Blvd Baltimore, MD 21244 Access the Open Payments User Guide [PDF, 37.3 MB] Taxpayer Identification Number (TIN): 111111111 Your Role: Authorized Representative Need help with the website? Contact Us by email First Name: Tom Middle Name: Last Name: Miller Suffix (Jr., Sr., etc.): Review the Open Payments Privacy Policy [PDF, 102 KB] Business Email Address: openpayments5@yopmail.com Business Telephone Number: 222-222-2222 Job Title: Office Manager Business Address, Line 1: 7500 Security Blvd. Business Address, Line 2: City Name: Baltimore State: Maryland Zip Code: 21244 Nominations: Role: First **Business Email Address: Business Telephone** Last Name: Name: Number: Authorized Miller openpayments5@yopmail.com 222-222-2222 Representative

Figure 148: Review and Submit Profile Page

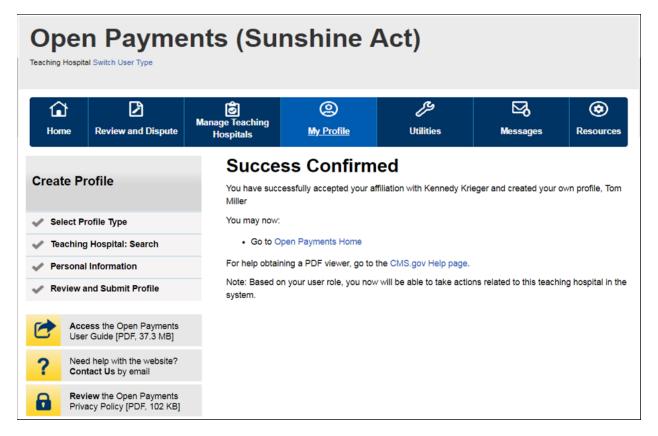
Continue

Back

Cancel

The following message will appear on-screen to confirm your nomination has been successfully accepted.

Figure 149: Success Confirmed Page



3.5g: 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.

<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM 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.

Figure 150: Open Payments Landing Page For First-Time Teaching Hospital User



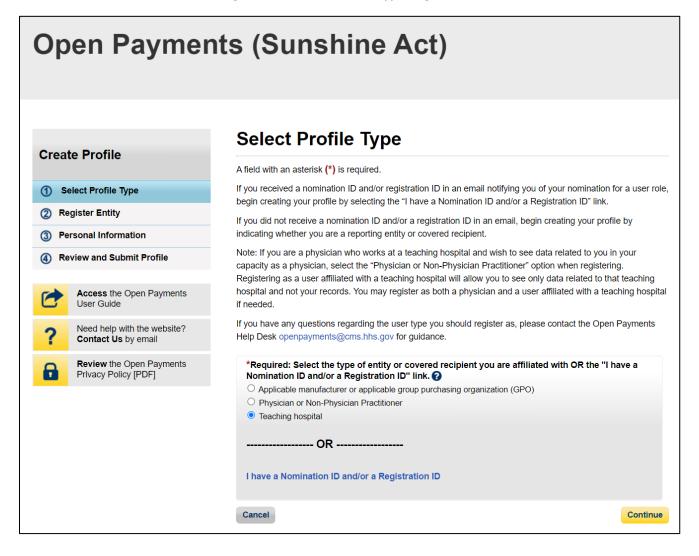
<u>Step 2:</u> The on-screen text contains important information regarding creating the physician or NPP and individual profiles. Read the on-screen text and select the link to the quick reference guide "Required Fields for Registration" for a list of information required during registration. Select "Start Profile" at the bottom of the page when you are ready to continue.

Figure 151: Create Profile Page



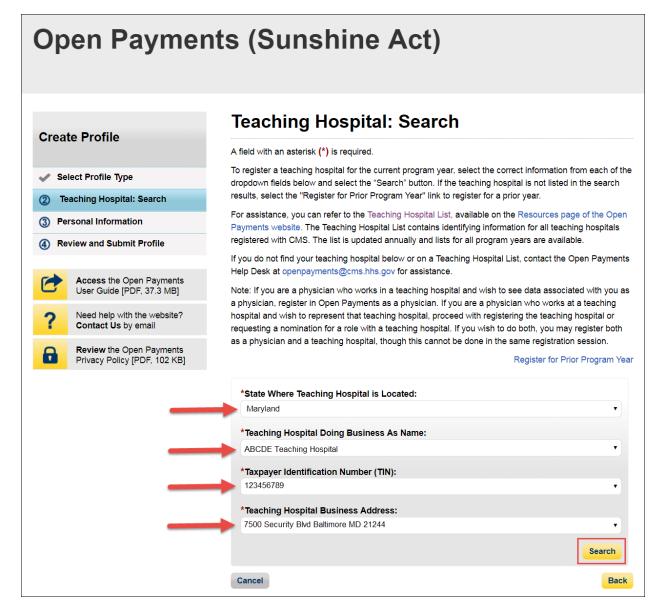
Step 3: Select the profile type "Teaching Hospital." When finished, select the "Continue" button.

Figure 152: Select Profile Type Page



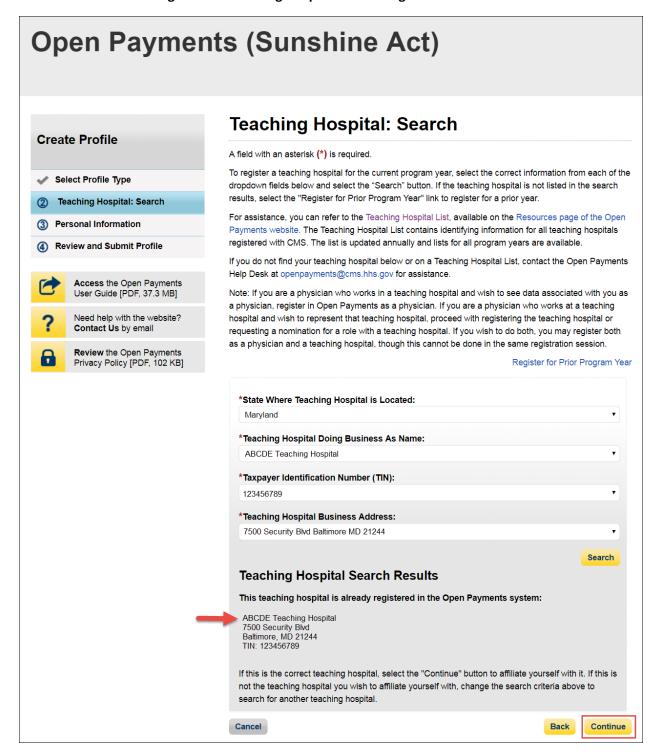
<u>Step 4:</u> Search the database for the correct teaching hospital. Select the teaching hospital's state, name, business address, and Taxpayer Identification Number (TIN) from the dropdowns. When finished, select the "Search" button.

Figure 153: Teaching Hospital Search Page



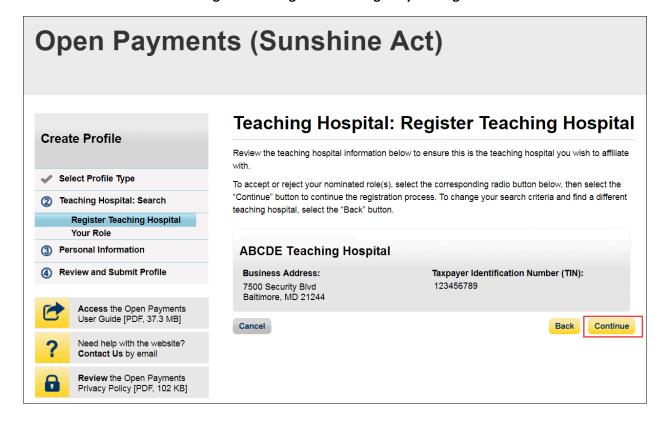
<u>Step 5:</u> Review the returned information displayed on the page. Select the "Continue" button if the information displayed is correct. If the information is not correct, select the "Back" button at the bottom of the page to return to the previous page and edit the search information you entered.

Figure 154: Teaching Hospital Search Page Search Results



<u>Step 6:</u> Review the information displayed on the page. If the information is correct, select the "Continue" button. If the information is not correct, select the "Back" button at the bottom of the page to select a different teaching hospital.

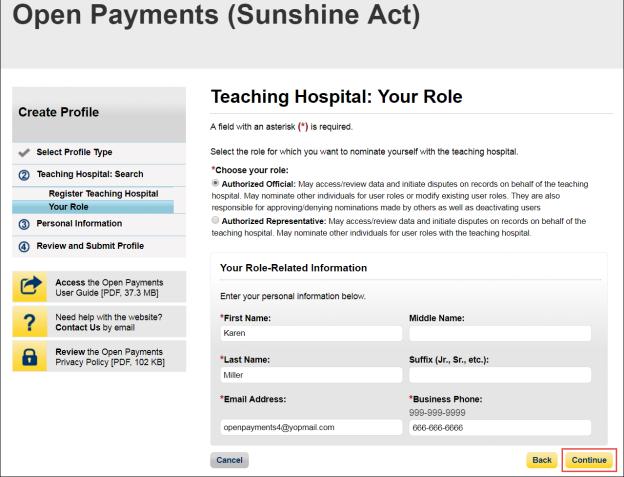
Figure 155: Register Teaching Hospital Page



<u>Step 7:</u> Select the role you wish to nominate yourself for in the teaching hospital. Note that as you are not registering with the teaching hospital, you may select either role. After you have chosen your role, enter in the role-related information in the data fields. Required fields are marked with an asterisk. Once you have entered all of the information, select the "Continue" button.

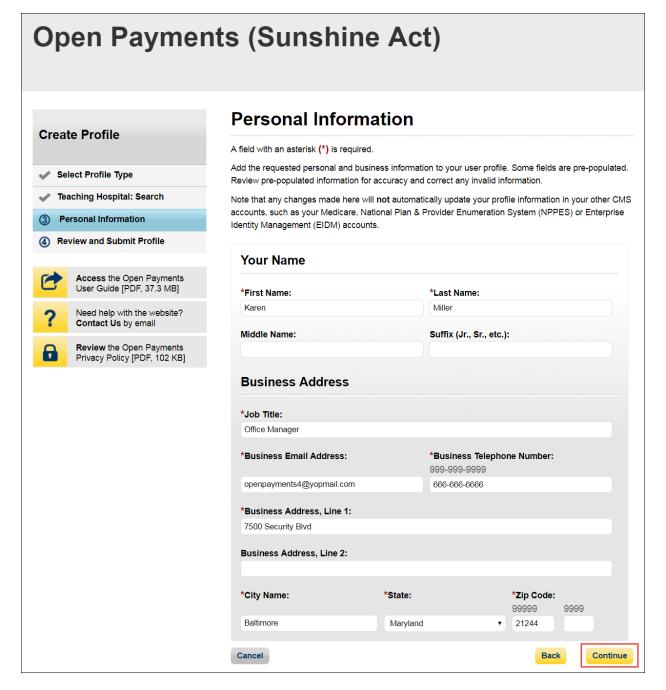
Figure 156: Teaching Hospital Your Role Page

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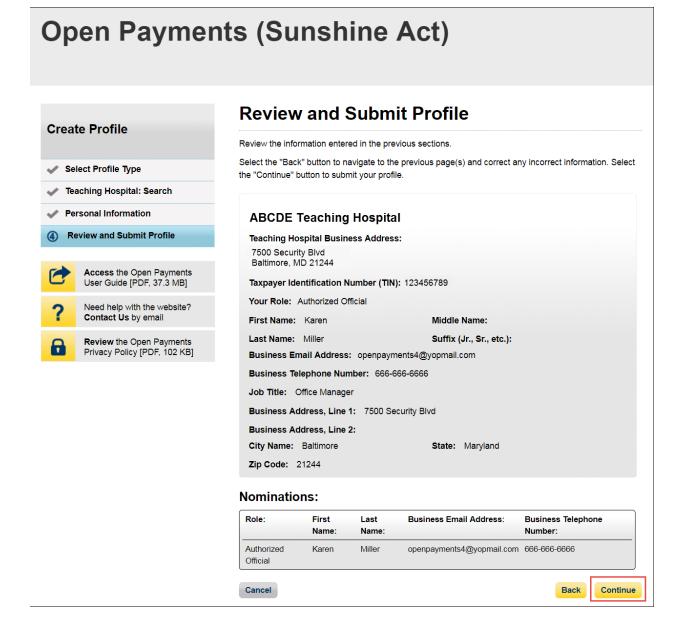
<u>Step 8:</u> Review your information displayed on the page. Enter your job title and business address. When finished, select the "Continue" button.

Figure 157: Personal Information Page



<u>Step 9:</u> 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 the "Continue" button.

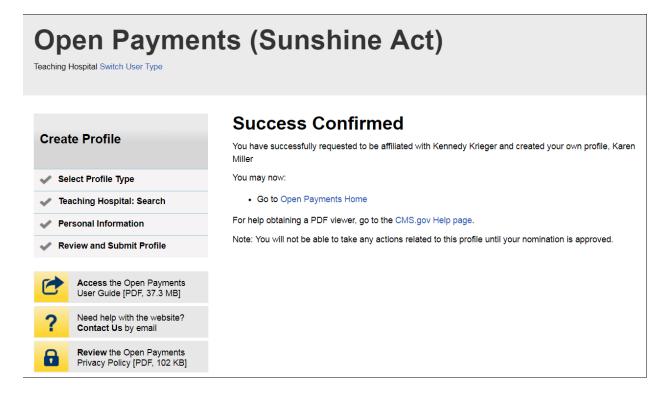
Figure 158: Review and Submit Profile Page



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 1-855-326-8366.

Figure 159: Success Confirmation Page

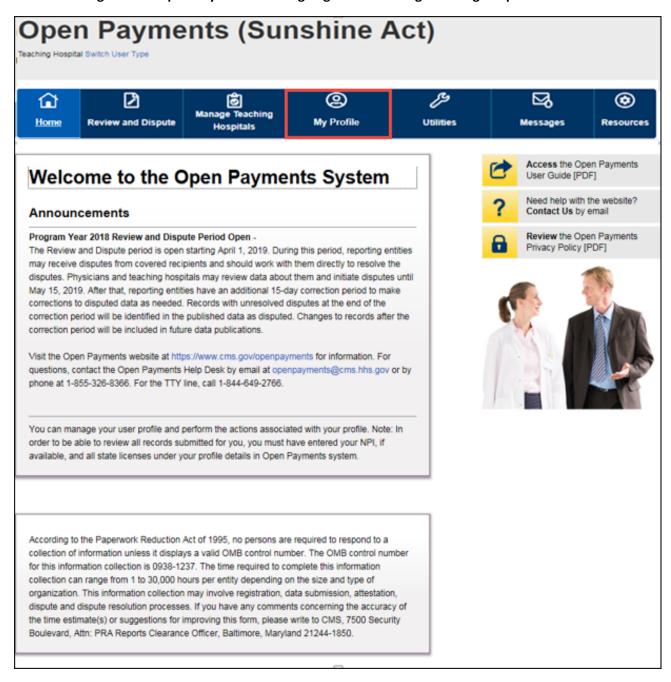


3.5h: Self-Nomination: Requesting a Role (Teaching Hospital - Returning System Users)

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.

<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM credentials and navigate to the Open Payments home page. Select the "My Profile" tab.

Figure 160: Open Payments Landing Page for Returning Teaching Hospital User



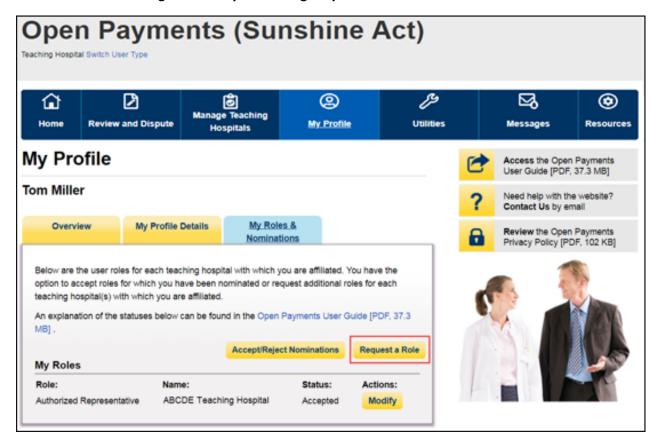
Step 2: Select the "My Roles and Nominations" tab.

Figure 161: My Profile Page



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

Figure 162: My Profile Page My Roles and Nominations Tab



<u>Step 4:</u> 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 the "Search" button.

Open Payments (Sunshine Act) Teaching Hospital Switch User Type פקק മ ⋈ ◉ a 0 Manage Teaching **Review and Dispute My Profile Utilities** Hospitals Teaching Hospital: Search Create Profile A field with an asterisk (*) is required. To register a teaching hospital for the current program year, select the correct information from each of the Select Profile Type dropdown fields below and select the "Search" button. If the teaching hospital is not listed in the search results, select the "Register for Prior Program Year" link to register for a prior year. Teaching Hospital: Search For assistance, you can refer to the Teaching Hospital List, available on the Resources page of the Open ③ Personal Information Payments website. The Teaching Hospital List contains identifying information for all teaching hospitals registered with CMS. The list is updated annually and lists for all program years are available. Review and Submit Profile If you do not find your teaching hospital below or on a Teaching Hospital List, contact the Open Payments Help Desk at openpayments@cms.hhs.gov for assistance. Access the Open Payments User Guide [PDF, 37.3 MB] Note: If you are a physician who works in a teaching hospital and wish to see data associated with you as a physician, register in Open Payments as a physician. If you are a physician who works at a teaching Need help with the website? hospital and wish to represent that teaching hospital, proceed with registering the teaching hospital or Contact Us by email requesting a nomination for a role with a teaching hospital. If you wish to do both, you may register both as a physician and a teaching hospital, though this cannot be done in the same registration session. Review the Open Payments Privacy Policy [PDF, 102 KB] 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

Figure 163: Teaching Hospital Search Page Search Fields

<u>Step 5:</u> Review the returned information displayed on the page. Select the "Continue" button 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.

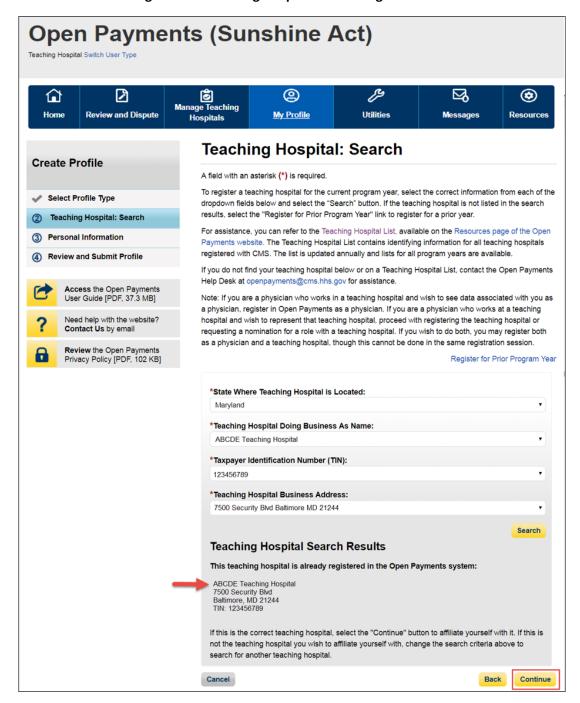
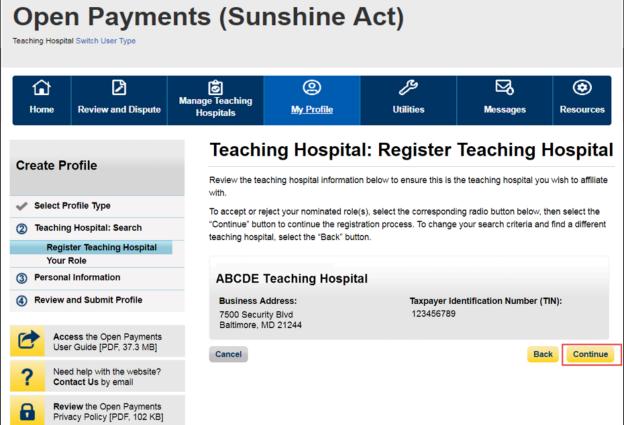


Figure 164: Teaching Hospital Search Page Continue

<u>Step 6:</u> Review the teaching hospital information. If the information is correct, select the "Continue" button. If the information is not correct, select the "Back" button at the bottom of the page to select a different teaching hospital.

Figure 165: Register Teaching Hospital Page



<u>Step 7:</u> Select the role you wish to nominate yourself for in the teaching hospital. Note that as you are not registering the teaching hospital, you may select either role. After you have chosen your role, 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 the "Continue" button.

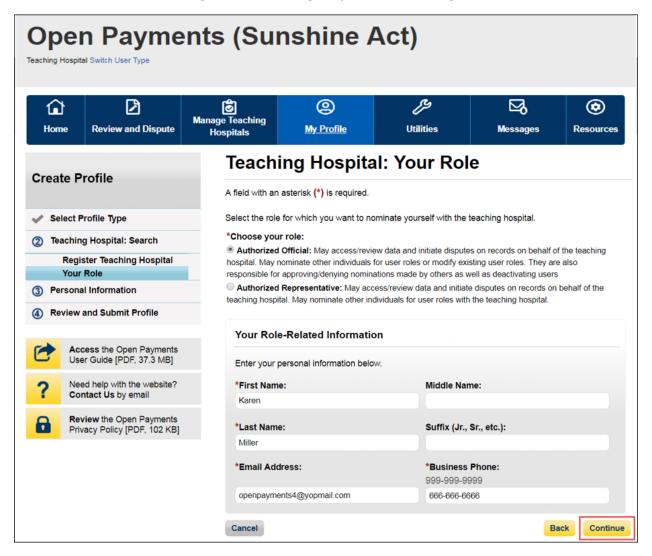
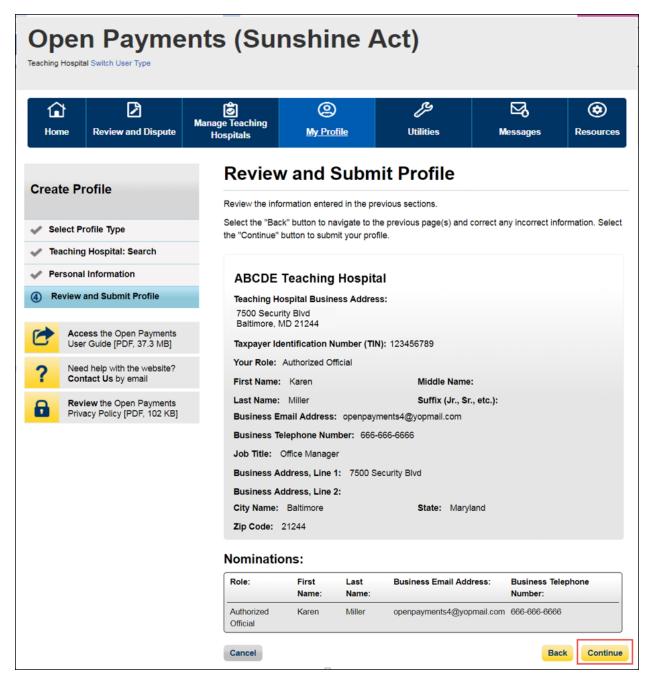


Figure 166: Teaching Hospital Your Role Page

<u>Step 8:</u> 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 the "Continue" button.

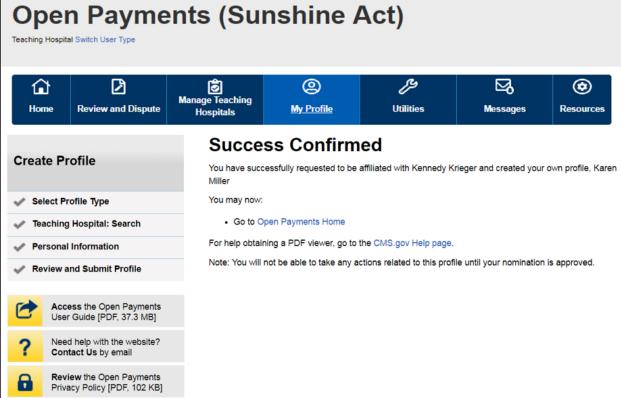
Figure 167: Review and Submit Profile Page



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 1-855-326-8366.

Figure 168: Success Confirmation Page

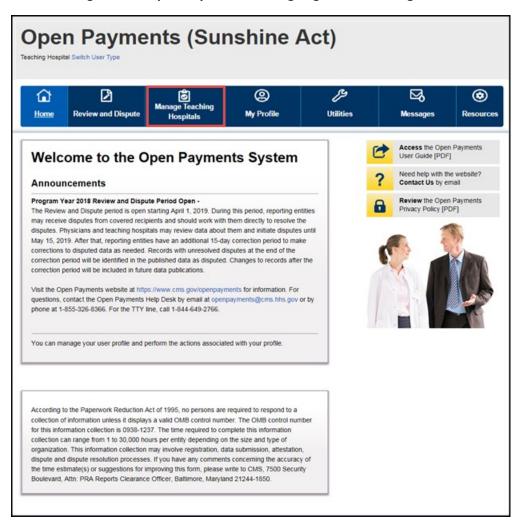


3.5i: Approving or Modifying a Nomination (Authorized Official Only)

If you are an authorized official for a teaching hospital and would like to approve or modify a nomination, follow the steps below.

<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM credentials and navigate to the Open Payments home page. Select "Manage Teaching Hospitals."

Figure 169: Open Payments Landing Page For Returning User



<u>Step 2:</u> On the "Manage Teaching Hospitals" page, select the teaching hospital for which you want to confirm a nomination.

Open Payments (Sunshine Act) @ ß 図 **③** My Profile Utilities Access the Open Payments User Guide [PDF, 37.3 MB] **Manage Teaching Hospitals** Need help with the website? Below are the teaching hospitals with which you are affiliated. To view details and manage user Contact Us by email roles, select a teaching hospital from the list below. You may register a new teaching hospital by selecting the "Register New Teaching Hospital" button. Review the Open Payments Privacy Policy [PDF, 102 KB] Register New Teaching Hospital Your Teaching Hospitals Doing Business As (DBA) TIN: Address: Status: ABCDE Teaching Hospital 123456789 7500 Security Blvd Baltimore, MD 21244 Registered

Figure 170: Manage Teaching Hospitals Page

Step 3: Select the "Manage Roles" tab.

Open Payments (Sunshine Act) 2 @ ß 図 **③** Review and Dispute My Profile XYZ Teaching Hospital User Guide [PDF, 28.8 MB] Teaching Hospital Manage Roles Need help with the website? Contact Us by email Review the Open Payments Privacy Policy [PDF, 102 KB] Below are the details for the teaching hospital you selected, listed by program year. XYZ Teaching Hospital Taxpayer Identification Number (TIN): 11-1231234 **Teaching Hospital History** Program Year TIN DBA Name Legal Name 7500 Security Blvd Baltimore MD 21244
7500 Security Blvd Baltimore MD 21244 XYZ Teaching Hospital 2018 7500 Security Blvd Baltimore MD 21244 XYZ Teaching Hospital 11- XYZ Teaching 1231234 Hospital 2017 7500 Security Blvd Baltimore MD 21244 7500 Security Blvd Baltimore MD 21244 11- XYZ Teaching 1231234 Hospital XYZ Teaching 2016 Hospital 7500 Security Blvd Baltimore MD 21244 7500 Security Blvd Baltimore MD 21244 11- XYZ Teaching 1231234 Hospital XYZ Teaching Hospital 2015 7500 Security Blvd Baltimore MD 21244 7500 Security Blvd Baltimore MD 21244 11- XYZ Teaching 1231234 Hospital XYZ Teaching 7500 Security Blvd Baltimore MD 21244 7500 Security Blvd Baltimore MD 21244 11- XYZ Teaching 1231234 Hospital XYZ Teaching Hospital

Figure 171: Teaching Hospital Information Page

<u>Step 4:</u> To approve a nomination, select the "Approve" button next to a nominee's name. The nominee will receive an email notification informing them of the acceptance of their nomination.

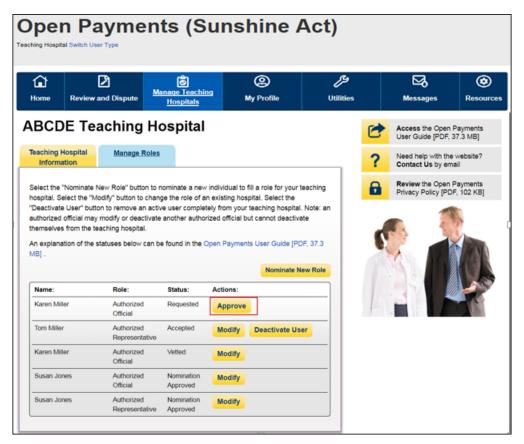


Figure 172: Teaching Hospital Manage Roles Tab

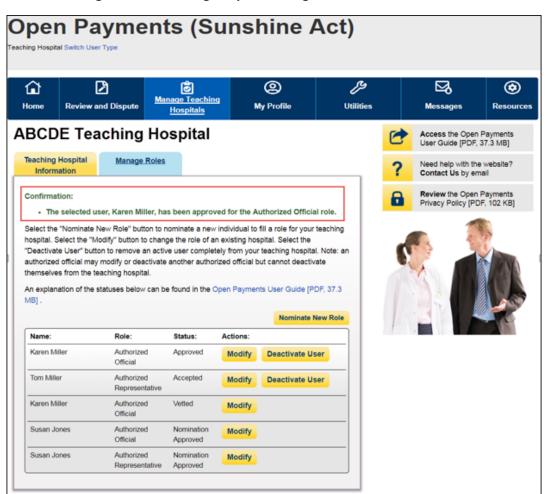


Figure 173: Teaching Hospital Manage Roles Tab Confirmation

<u>Step 4a</u>: To modify a nomination, select the "Modify" button next to a nominee's name. This will allow you to change the individual's information and/or role. When modifications are complete, select "Save Role."

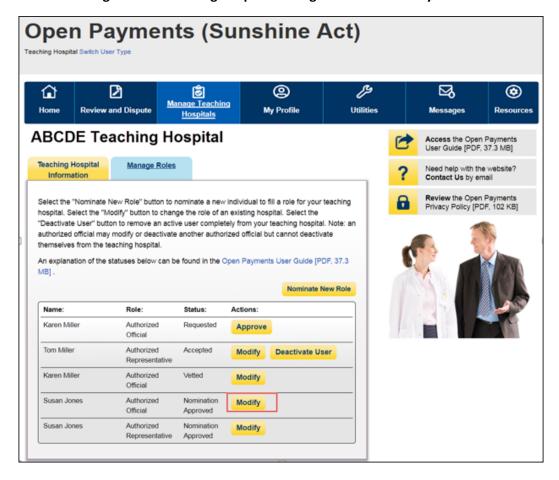
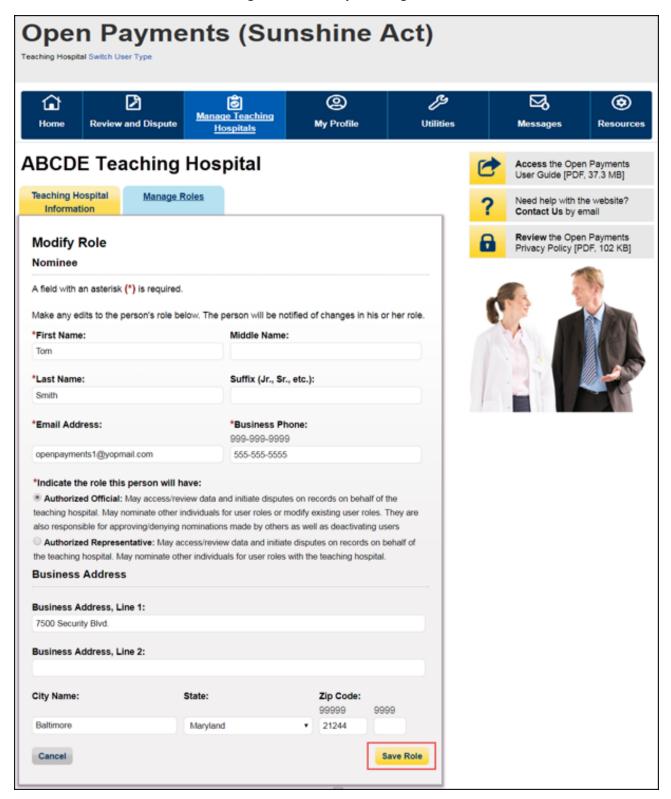


Figure 174: Teaching Hospital Manage Roles Tab Modify Roles

Note that you cannot remove all user roles from a nominee.

Figure 175: Modify Role Page



<u>Step 5:</u> You will now see an updated list of nominations on the "Manage Roles" tab.

Open Payments (Sunshine Act) B (2) 罓 2 ➌ ۵ ø Review and Dispute My Profile Utilities Messages Resource: ABCDE Teaching Hospital User Guide [PDF, 37.3 MB] Teaching Hospital Manage Roles Information Contact Us by email Review the Open Payments Privacy Policy [PDF, 102 KB] · You have successfully modified a user role. Select the "Nominate New Role" button to nominate a new individual to fill a role for your teaching hospital. Select the "Modify" button to change the role of an existing hospital. Select the "Deactivate User" button to remove an active user completely from your teaching hospital. Note: an authorized official may modify or deactivate another authorized official but cannot deactivate themselves from the teaching hospital. An explanation of the statuses below can be found in the Open Payments User Guide [PDF, 37.3 MB]. Nominate New Role Name: Role: Status: Actions: Karen Miller Authorized Vetted Modify Official Authorized Joe Miller Modify Representative Approved Tom Smith Authorized Nomination Modify Official

Figure 176: Teaching Hospital Manage Roles Tab Confirmation

3.5j: Deactivating a User

A user holding the role of authorized official with a teaching hospital can deactivate other individuals' user roles with that teaching hospital, including other authorized officials. Deactivation removes an individual's association with a teaching hospital in the Open Payments system, including removing the individual's access to that teaching hospital's information and records. It does not remove the individual from the Open Payments system.

You cannot deactivate yourself. If you wish to be deactivated, contact the Open Payments Help Desk.

Only active users can be deactivated; individuals who have not yet accepted or rejected a user role nomination cannot be deactivated, nor can individuals who have self-nominated for a user role but their nomination has not yet been approved or denied.

To deactivate an individual's user role, follow these steps.

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

Figure 177: Open Payments Landing Page for Returning User



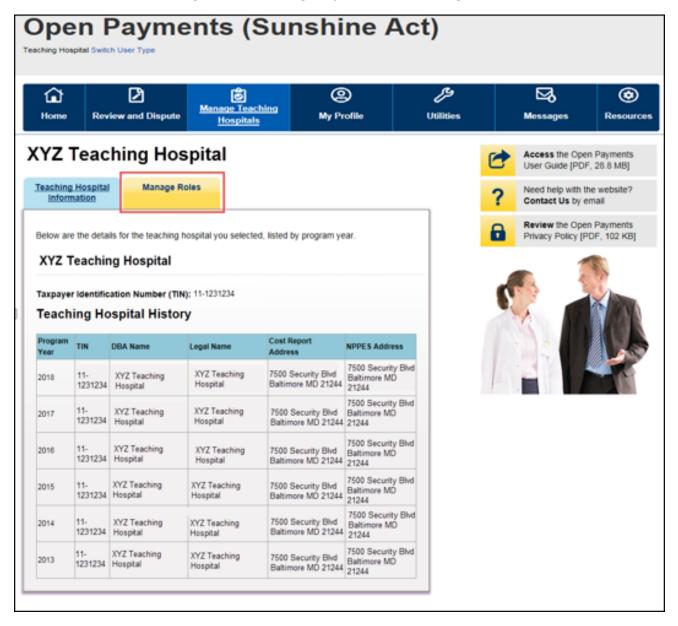
<u>Step 2:</u> You will see a list of all of the teaching hospitals you are associated with. Select the hyperlink for the teaching hospital for which you will be deactivating a user.

Figure 178: Manage Teaching Hospitals Page



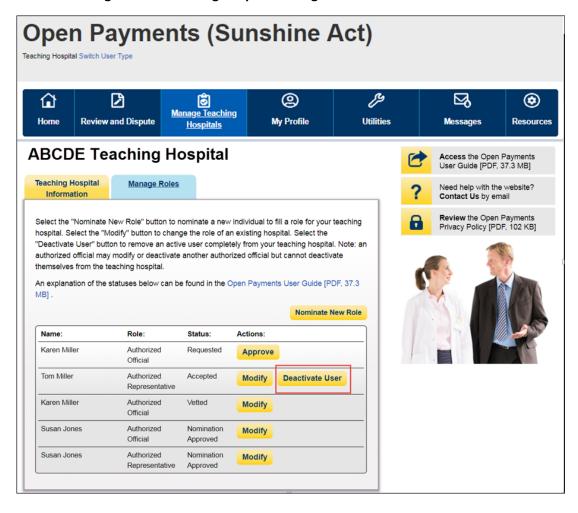
Step 3: Select the "Manage Roles" tab.

Figure 179: Teaching Hospital Information Page



Step 4: Select the "Deactivate User" button associated with name of the individual's name

Figure 180: Teaching Hospital Manage Roles Tab Deactivate User



<u>Step 5:</u> The Open Payments system will ask you to confirm the deactivation. Select the "Continue" button to confirm deactivation or the "Cancel" button to return to the Manage Roles page with no action taken. If you confirm deactivation, the Open Payments system will send emails to you and the individual being deactivated that confirms the individual's user role deactivation.

ABCDE Teaching Hospital Access the Open Payments User Guide [PDF, 37.3 MB] Teaching Hospital Manage Roles Need help with the website? Contact Us by email Information Review the Open Payments Privacy Policy [PDF, 102 KB] Select the "Nominate New Role" button to no hospital. Select the "Modify" button to change Deactivate User "Deactivate User" button to remove an active Selecting this option will deactivate Karen Miller from your authorized official may modify or deactivate teaching hospital. They will no longer be able to perform themselves from the teaching hospital. actions on behalf of your teaching hospital. An explanation of the statuses below can be MB1. Reminder: all teaching hospitals must have at least one active authorized official in the Open Payments system. Select "Continue" to deactivate this user, or select "Cancel" to return to the previous page. Role: Name: Karen Miller Authorized Cancel Continue Official Tom Miller Authorized Representative Karen Miller Modify Susan Jones Authorized Modify Susan Jones Authorized Modify Approved

Figure 181: Teaching Hospital Manage Roles Tab- Confirmation Page

Section 3.6: Updating Profile Information in the Open Payments System

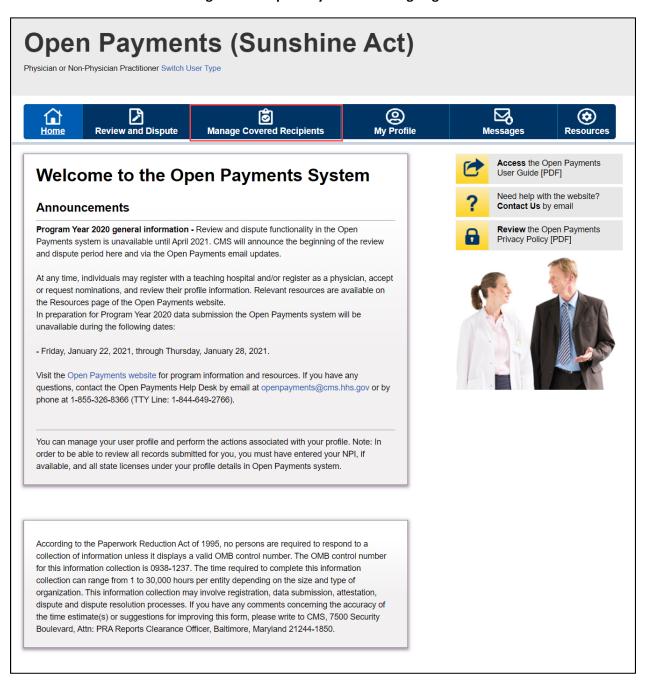
Physician, NPP, and teaching hospital profiles can be kept current by updating them as information changes. The steps for profile updates are given below.

3.6a: Updating a Covered Recipient Profile as an Authorized Representative

As an authorized representative who holds the level of access of "Modify Profile" to edit their covered recipient's profile, follow these steps.

<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM credentials, navigate to the Open Payments home page, and select the "Manage Covered Recipients" tab.

Figure 182: Open Payments Landing Page



<u>Step 2:</u> Select the covered recipient for which you wish to make updates on the "Manage Covered Recipients" page.

Figure 183: Manage Covered Recipients Page



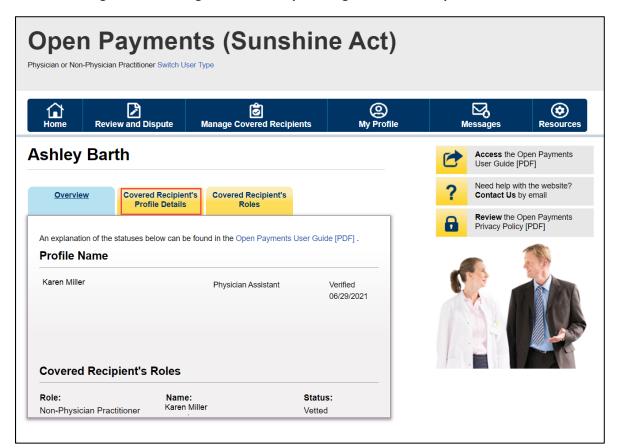
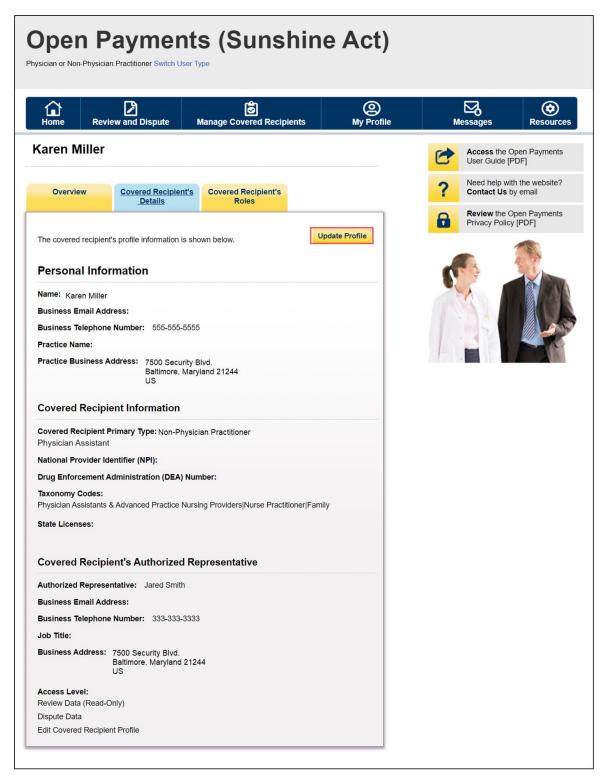


Figure 184: Manage Covered Recipient Page- Covered Recipient Selected

<u>Step 3:</u> Select the "Covered Recipient's Profile Details" tab to view the profile information for the selected covered recipient. You will be able to view the physician's personal information, covered

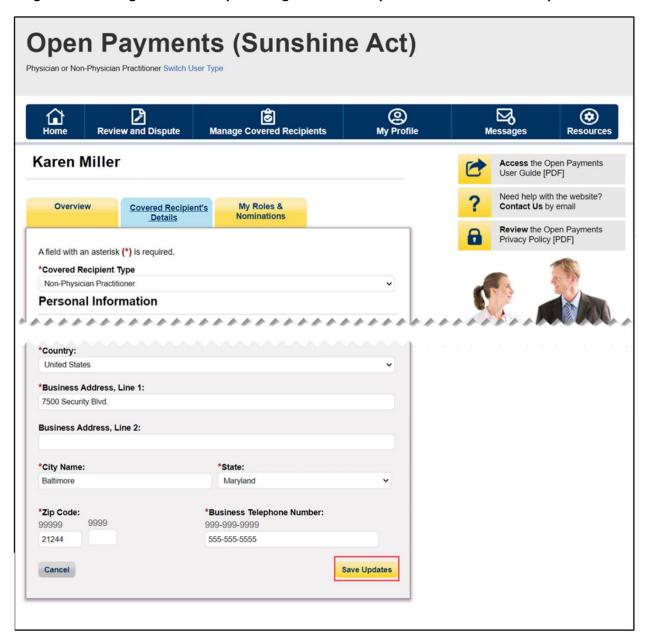
recipient information, and the covered recipient's authorized representative information. Select "Update Profile" to begin making updates.

Figure 185: Manage Covered Recipients Page Covered Recipient's Profile Details Tab



Step 4: Update the necessary information. When your updates are complete, select "Save Updates."

Figure 186: Manage Covered Recipients Page Covered Recipient's Profile Details Tab Update Profile



Note: Any updates made to the covered recipient profile require that the covered recipient be revetted. Once the updated information has been re-vetted, both the covered recipient and authorized representative will be able to perform the necessary actions in the Open Payments system. See Section 3.3c for information on physician vetting and Section 3.3f on NPP vetting.

3.6b: Updating Covered Recipient or Covered Recipient 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.

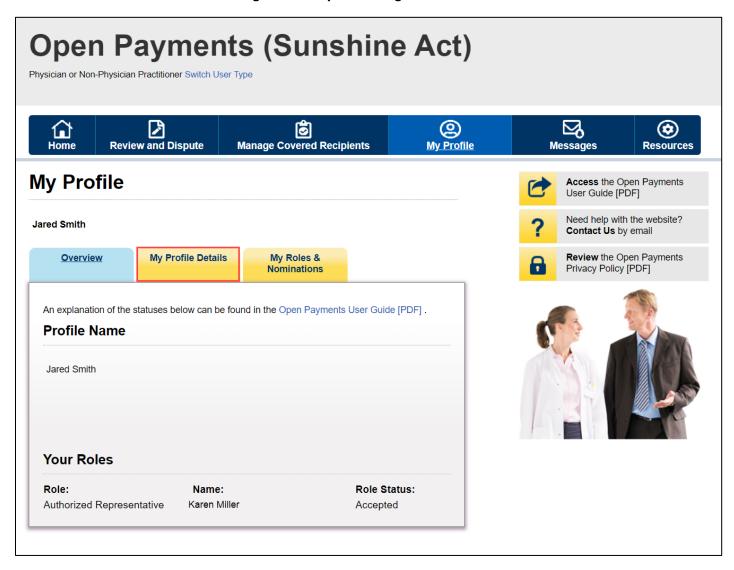
<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM credentials, navigate to the Open Payments home page, and select the "My Profile" tab.

Figure 187: Open Payments Landing Page for Returning Physician and NPP Users



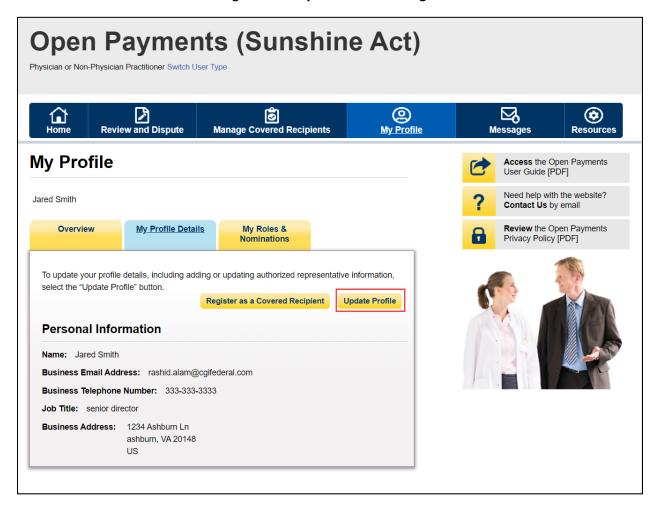
Step 2: Select the "My Profile Details" tab. You will be able to view your existing profile information.

Figure 188: My Profile Page



Step 3: Select "Update Profile" to begin making edits and/or updates.

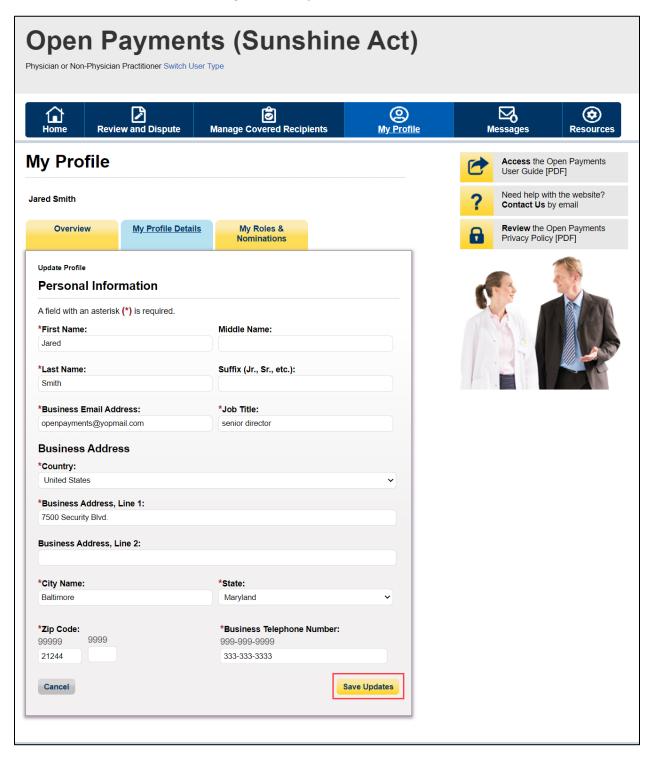
Figure 189: My Profile Details Page



Step 4: Update fields as necessary. When changes are complete, select "Save Updates."

The updated information will now appear on the "My Profile Details" page.

Figure 190: My Profile Details Tab



Review and Dispute

Chapter 4: Review and Dispute for Physicians, NPPs, Teaching Hospitals, and Principal Investigators

This chapter provides information on the review, dispute, and correction process for physicians, NPPs, teaching hospitals, and principal investigators in the Open Payments system.

This chapter is divided into the following sections:

- **Review and Dispute Process Overview** provides information on the review and dispute process within the Open Payments system.
- Reviewing Records provides information on how physicians, NPPs, teaching hospitals, and
 principal investigators can review data submitted about them by applicable manufacturers and
 applicable GPOs.
- Affirming Records provides information on how physicians, NPPs, teaching hospitals, and principal investigators can affirm data submitted about them by applicable manufacturers and applicable GPOs.
- Disputing Records provides information on how physicians, NPPs, teaching hospitals, and
 principal investigators can initiate disputes against data submitted about them by applicable
 manufacturers and applicable GPOs.
- **Withdrawing Disputes** provides information on how physicians, NPPs, teaching hospitals, and principal investigators can withdraw disputes they have initiated against data submitted about them by applicable manufacturers and applicable GPOs.

This chapter covers the review and dispute functions for physicians, NPPs, teaching hospitals, and principal investigators.

Section 4.1: Review and Dispute Process Overview

Physicians, NPPs, teaching hospitals, and principal investigators registered in the Open Payments system may review data reported about them by applicable manufacturers and applicable GPOs in the Open Payments system record(s) that were submitted during that calendar year's submission period. This includes records submitted for the previous program year and any records submitted late from prior program years.

During a review, the reviewer may perform two optional actions:

- If the reviewing physician, NPP, teaching hospital user, or principal investigator agrees that a record is accurate, they can **affirm** the record. Note: Affirmation is not a required action. Records that have not been affirmed will still be included in the next data publication.
- If the reviewing physician, NPPs, teaching hospital user, or principal investigator believes a record is in error, they can **initiate a dispute** against the record.

These actions can be performed on one record at a time.

Physicians, NPPs, and teaching hospitals may dispute any part of a record in which they are identified as the covered recipient. Physicians and NPPs identified in a record as a Principal Investigator (PI) rather than covered recipient may only dispute their own association with the record and their own personal identifying information given in that record. They should not dispute any other information in the record, such as payment amount, nature of payment, etc.

To resolve a dispute, physicians, NPPs, teaching hospitals, and principal investigators should work directly with reporting entities outside of the Open Payments system. **CMS will not mediate or facilitate disputes between physicians, NPPs, teaching hospitals, principal investigators, and reporting entities.** The outcome of the resolution will be recorded in the Open Payments system. Dispute resolutions can lead to changes to the submitted data, or the dispute may be resolved without changes to the data. In addition, a dispute may be withdrawn by the individual who initiated it.

Email notifications are sent to alert applicable manufacturers, applicable GPOs, physicians, NPPs, teaching hospitals, and principal investigators of review and dispute activities in the Open Payments system.

Note: records that are flagged for a delay in publication by the reporting entity are eligible for review and dispute by physicians, NPPs, teaching hospitals, and principal investigators.

4.1a: Review, Dispute, and Correction Period

Each program year has a scheduled review, dispute, and correction period. The period is 60 days long and divided into two sections.

The period begins with a 45-day period for physicians, teaching hospitals, NPPs, 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 45-day period is a 15-day correction period for reporting entities to continue to make corrections to records and resolve any active disputes.

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 publication. 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. Refer to the "Methodology and Data Dictionary Document" available on the Resources page of the Open Payments website, at https://www.cms.gov/OpenPayments/Resources 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.

4.1b: 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, NPP, teaching hospital, or principal investigator will be able to view the original record disputed under the "Deleted and In Progress Records" tab with status of "In Progress" and the user(s) that have disputes in "Initiated" or "Acknowledged" status will be notified via email that the record is being updated by the entity. Once the record has been re-attested, the record will be available under the "Available for Review and Dispute" tab again.

If the physician, NPP, teaching hospital, or principal investigator identified in a record is changed as part of a dispute resolution, the original physician, NPP, teaching hospital, or principal investigator will no longer see the record under the "Available for Review and Dispute" tab, the record will be available under the "Deleted and In Progress Records" tab. If the deletion of the record was in response to a dispute, any user(s) that have disputes in "Initiated" or "Acknowledged" status will be notified via email that the record has been deleted by the entity when the record is re-attested. The records that have been deleted will display under the "Deleted and In Progress Records" tab with a "Deleted" status. The newly identified physician, NPP, teaching hospital, or principal investigator will see the record during the next calendar year's review and dispute period under the "Available for Review and Dispute" tab.

If a reporting entity edits or deletes a disputed record, the Open Payments system will send an email notification to the individual(s) who initiated the dispute(s). If the dispute initiator is a covered recipient's authorized representative, email notifications will be sent to both the authorized representative and the physician and/or NPP.

Refer to the "Methodology and Data Dictionary Document" available on the Resources page of the Open Payments website, at https://www.cms.gov/OpenPayments/Resources for details on how changes to records affect data publication.

4.1c: Review and Dispute Statuses

Records available for the review and dispute process will have one of the following review and dispute statuses:

- **Initiated**: Indicates that a physician, NPP, 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, NPP, teaching hospital, or principal investigator.
- Resolved No Change: Indicates that the applicable manufacturer or applicable GPO and the
 physician, NPP, 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, NPP, 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.

Records submitted during the submission period that calendar year may be unavailable for review and dispute for one of the following reasons:

- A deleted record can only be viewed under the "Deleted and In Progress Records" tab and cannot be disputed. For deleted records only the record information will display.
 Disputes associated to the record will not be available once the record has been deleted.
- A record undergoing editing by its reporting entity can only be viewed under the "Deleted and In Progress Records" tab and cannot be disputed. Records undergoing editing will display all the dispute statuses and dispute details (where available).

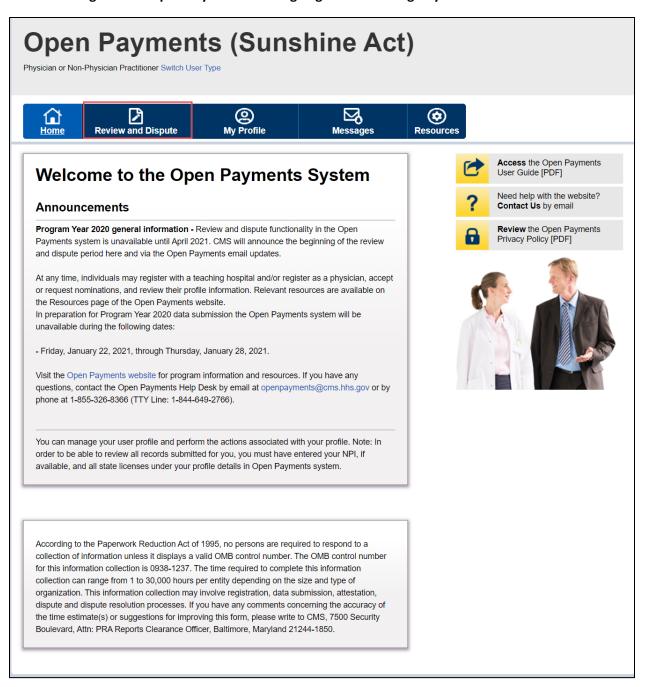
Section 4.2: Reviewing Records

Physicians, NPP, 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.

A step-by-step walkthrough for reviewing records follows.

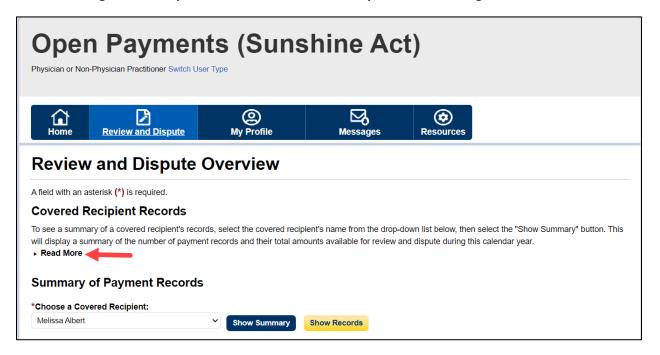
<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM credentials, navigate to the Open Payments home page, and select the "Review and Dispute" tab on the menu bar. "Review and Dispute Overview" page is displayed.

Figure 191: Open Payments Landing Page for Returning Physician and NPP User



<u>Step 2</u>: On the "Review and Dispute Overview" page, some instructions will be visible. To display all of the instructions, select the "Read More" hyperlink.

Figure 192: Physician and NPP Review and Dispute Overview Page- Read More

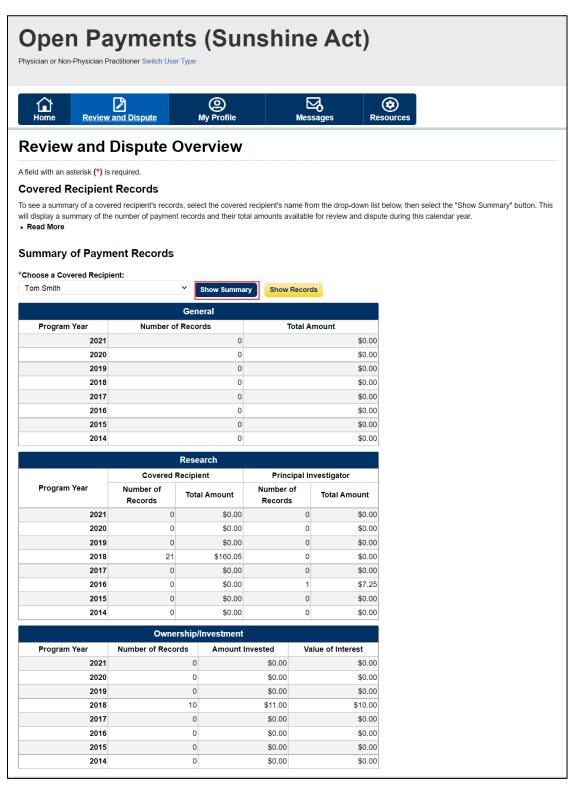


<u>Step 3</u>: Under the heading "Summary of Payment Records," select the covered recipient whose records are to be reviewed from the drop-down menu. To see the summary of payment records for the covered recipient chosen, select the "Show Summary" button. This will bring up the Summary of Payment Records.

The Summary of Payment Records displays the total number of records available for review and dispute for the selected covered recipient and the total dollar amount for those records. The totals are grouped by program year and payment category.

For physicians and NPPs, the research payment category totals are split to differentiate between the records in which the physician and/or the NPP is identified as the covered recipient and the records in which the physician and/or the NPP is identified a principal investigator. Note that teaching hospital summaries do not include an Ownership/Investment section, as that payment category is not applicable to them.

Figure 193: Physician and NPP Review and Dispute Overview Page



<u>Step 4:</u> Select the "Show Records" button to navigate to the "Review and Dispute" page for the covered recipient.

Open Payments (Sunshine Act) Review and Di 罓 Review and Dispute - Tom Smith Below is the list of all payment records in which the non-physician practitioner or physician is a covered recipient or principal investigator that are eligible for review and dispute this calendar year. ► Read More **Covered Recipient Records** Program Year: Entity Making Payment: Order By: Please Select Please Select Review and Dispute Status: Maximum 38 digits Initiated Acknowledged Resolved No Change Withdrawn Resolved Payment Category: Affirmed (Yes/No): Reported As: ☐ General Payments ☐ Research Payments ☐ Yes ☐ No Recipient
Principal Investigator Ownership or Investment Interest Search Clear All Showing Results for: Available for Review and Dispute Deleted and In Progress Records ♣ Download Zip File Showing 10 v of 32 Entries v v Page 1 of 4 Page 1 v Record ID 71158271 Entity Making Payment Record Status Program Year 2018 Record ID Affirmed 71158271 Research Payments **Total Payment Amount** Value of Interest Delay in Publication of Research Payment Indicator \$7.22 Date of Payment Principal Investigators Associated Listed as PI Only 2018-12-31 Affirm Record Dispute Record Record ID 73770083 Entity Making Payment Program Year Record Status Research Payments Total Payment Amount Value of Interest Delay in Publication of Research Payment Indicator \$7.22 Principal Investigators Associated Listed as PI Only Date of Payment Affirm Record Dispute Record Showing 10 v of 32 Entries Page 1 of 4 Page 1 v

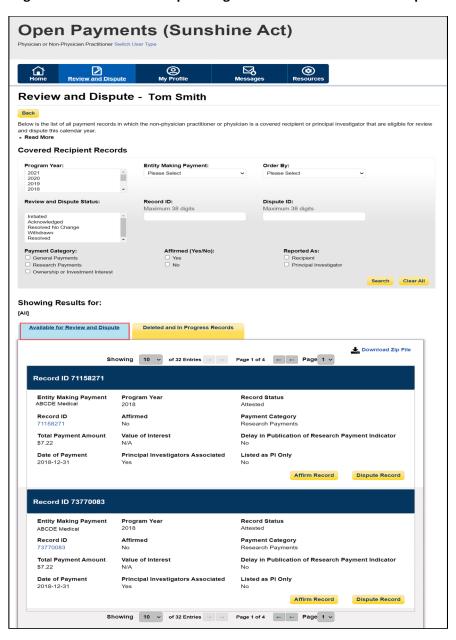
Figure 194: Physician and NPP Review and Dispute Page

<u>Step 5</u>: The "Review and Dispute" page displays all available records for review. Users can use available filters on the page to narrow search results as desired.

There are two tabs that may contain information related to the disputes attributed to the covered recipient:

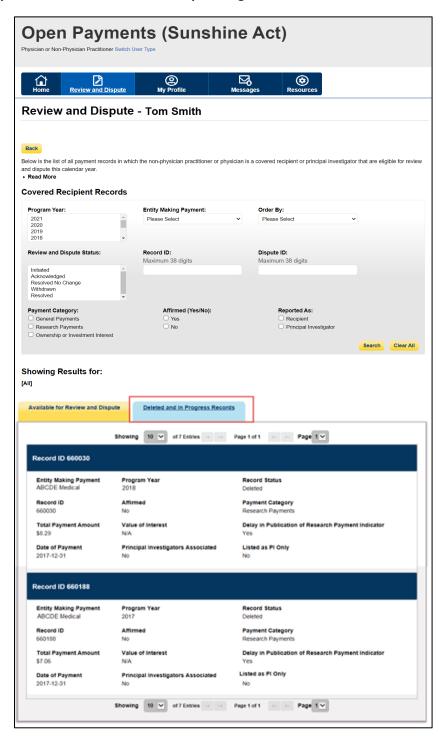
• Available for Review and Dispute: This tab displays all records that are currently available for review and dispute. All records in this tab are in "Attested" status.

Figure 195: Review and Dispute Page Available for Review and Dispute



• **Deleted and In Progress Records**: This tab displays all records that were available for review and dispute in the current calendar year but were deleted or are in the process of being edited by the AM/GPOs and are not available for review. Note that review and dispute actions will not be allowed for these records as they can only be viewed.

Figure 196: Physician and NPP Review and Dispute Page Available for Deleted and In Progress Records



<u>Step 6</u>: Records on the "Review and Dispute" page are displayed in a card format. To see all a record's information, select the hyperlinked number under the "Record ID" heading. This will open the "Record ID" page for that record, which contains the record's details, general information, and reporting entity contact information. The Record Details page also displays any "Active Disputes," if available.



Figure 197: Record ID Page

<u>Step 7</u>: Available disputes are displayed as a child record within the payment record on the covered recipient "Review and Dispute" page. Select "Dispute ID" link to view all dispute(s) associated with the record. Each dispute is displayed in an accordion style listed in descending order of Dispute ID. The record header also displays the total number of disputes for the record.

Open Payments (Sunshine Act) Physician or Non-Physician Practitioner Switch User Type 0 Review and Dispute - TOM SMITH Below is the list of all payment records in which the physician is a covered recipient or principal investigator that are eligible for review and dispute this cale Physician Records Affirmed (Yes/No): Showing Results for: ▲ Download Zip File Showing 10 V of 142 Entries - - Page 1 of 15 w n Page 1 V Record ID 672652 Record Status Payment Category General Payments Dispute ID 1001219 (Initiate Initiated on 2018-09-13 by TOM SMITH Date of Payment 2017-12-31 Showing 10 V of 142 Entries - - Page 1 of 15 - - Page 1 V

Figure 198: Physician and NPP Review and Dispute Page Dispute ID

Section 4.3: Affirming Records

Records that have been reviewed and determined to be accurate can be affirmed by the physician, NPP, 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.

To affirm a record, follow the steps below.

<u>Step 1</u>: On the "Review and Dispute" page, use the filtering tools to help find the records to be affirmed, then select the "Search" button. All records available for affirmation will be under the "Available for Review and Dispute" tab.

Step 2: Select the "Affirm Record" button to open the "Affirm Record" page.

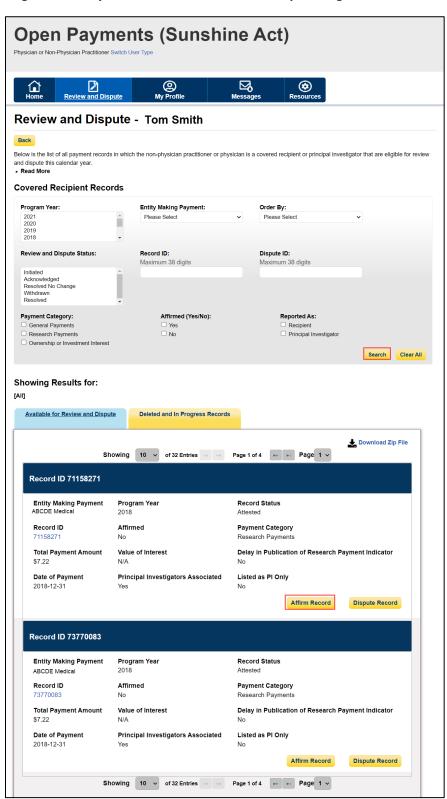
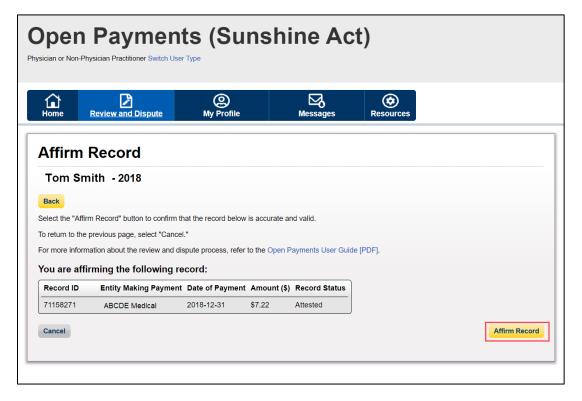


Figure 199: Physician and NPP Review and Dispute Page Affirm Record

<u>Step 3</u>: Review the information displayed on the "Affirm Record" page. Select "Affirm Record" button to affirm the record.

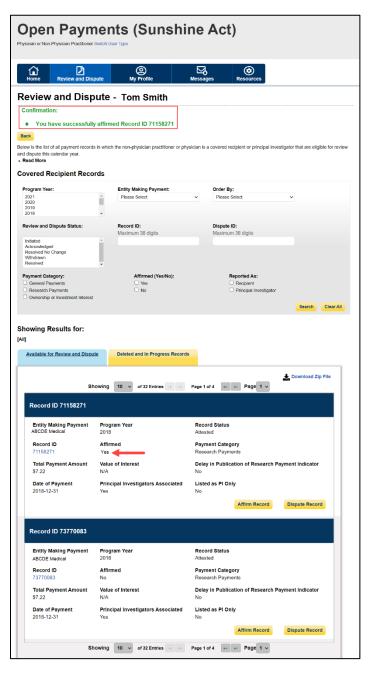
Figure 200: Affirm Record Page



Step 4: A confirmation message is displayed that the record has been successfully affirmed.

Note: Once a record has been affirmed, the "Affirm Record" button will be grayed out.

Figure 201: Physician and NPP Review and Dispute Page Confirmation



Section 4.4: Disputing Records

Records can only be disputed individually. To initiate a dispute on a record, follow the steps below.

<u>Step 1</u>: On the "Review and Dispute" page, use the filtering tools to help find the records to be disputed, then select the "Search" button. All records available for dispute will be under the "Available for Review and Dispute" tab.

Step 2: Select the "Dispute Record" button to dispute the record. This opens the "Dispute Record" page.

Note that when the user selects the "Dispute Record" button to initiate a dispute on a record which has an active dispute (Dispute Status is "Initiated" or "Acknowledged"), the system will display a pop-up window identifying that a dispute has already been initiated against the record with the following messages based on the scenarios explained below:

• The covered recipient (not principal investigator), covered recipient's Authorized Representative (AR) or Teaching Hospital's Authorized Representative (AR)/Authorized Official (AO) has ACTIVE (Dispute Status is "Initiated" or "Acknowledged") disputes against the record. The Record ID header displays "Disputed (# of disputes)" and the following pop-up message is issued when the user selects the "Dispute Record" button:

The selected payment record has a dispute that is currently in progress.

Select Yes to continue with your dispute request.

Select No to cancel your dispute request.

• The covered recipient is a principal investigator or AR for a covered recipient listed as principal investigator and has NO ACTIVE disputes against the record. The Record ID header only displays the Record ID and the following pop-up message is issued when the user selects the "Dispute Record" button:

The selected payment record has the covered recipient listed as a principal investigator. A principal investigator is not considered a recipient of a payment but rather is considered associated with the payment.

As a result, the dispute can be initiated for the covered recipient's association with the selected research payment(s) but not the date, amount, or other values it contains.

Select Yes to continue with your dispute request.

Select No to cancel your dispute request.

The covered recipient is a principal investigator or AR for a covered recipient listed as a principal
investigator and has disputes in status other than "Initiated" or "Acknowledged" against that
record. The Record ID header displays "Disputed (# of disputes)" and the following pop-up
message is issued when the user selects the "Dispute Record" button:

The selected payment record has the covered recipient listed as a principal investigator. A principal investigator is not considered a recipient of a payment but rather is considered associated with the payment.

As a result, the dispute can be initiated for the covered recipient's association with the selected research payment(s) but not the date, amount, or other values it contains. Select Yes to continue with your dispute request.

Select No to cancel your dispute request.

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• The covered recipient is a principal investigator or AR for a covered recipient listed as a principal investigator and has ACTIVE ("Initiated" or "Acknowledged") disputes against the record. The Record ID header displays "Disputed (# of disputes)" and the following pop-up message is issued when the user selects the "Dispute Record" button:

The selected payment record has a dispute that is currently in progress. Note that the covered recipient is listed as a principal investigator in this record. As a result, the dispute can be initiated for the covered recipient's association with the selected research payment(s) but not the date, amount, or other values it contains. Select Yes to continue with your dispute request.

Select No to cancel your dispute request.

Open Payments (Sunshine Act) Physician or Non-Physician Practitioner Switch User Type v and D Message **②** Review and Dispute - Tom Smith Below is the list of all payment records in which the non-physician practitioner or physician is a covered recipient or principal investigator that are eligible for review and dispute this calendar year. **Covered Recipient Records** Program Year: Entity Making Payment: Order By: Please Select Please Select 2020 2019 2018 Review and Dispute Status: Record ID: Dispute ID: Maximum 38 digits Maximum 38 digits Payment Category: Affirmed (Yes/No): Reported As: ☐ Yes ☐ No General Payments ☐ Recipient ☐ Principal Investigator $\hfill \square$ Ownership or Investment Interest Showing Results for: Available for Review and Dispute Deleted and In Progress Records **♣** Download Zip File Showing 10 v of 32 Entries Page 1 of 4 Page 1 v Record ID 71158271 Entity Making Payment ABCDE Medical Record Status Attested Payment Category Affirmed 71158271 Research Payments Total Payment Amount Value of Interest Delay in Publication of Research Payment Indicator Date of Payment Principal Investigators Associated Listed as PI Only 2018-12-31 No Dispute Record Record ID 73770083 Record Status **Entity Making Payment Program Year** ABCDE Medical Record ID Affirmed **Payment Category** Research Payments **Total Payment Amount** Value of Interest Delay in Publication of Research Payment Indicator N/A Date of Payment Principal Investigators Associated Listed as PI Only Affirm Record Dispute Record Showing 10 v of 32 Entries Page 1 of 4 Page 1 v

Figure 202: Physician and NPP Review and Dispute Page Dispute Record

Step 3: Review the information on the "Dispute Record" page. Enter a detailed reason for why the dispute has been initiated in the "Dispute Details and Contact Information" 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 the "Dispute Details and Contact Information" text includes review and dispute contact information, such as an email address and/or phone number, within the text box, to facilitate the resolution of the dispute in a timely manner.

Once the dispute is ready, select the "Send Dispute" button. The Open Payments system will send an email to the reporting entity to notify that a dispute has been initiated. The email will include the contents of the "Dispute Details and Contact Information" text box.

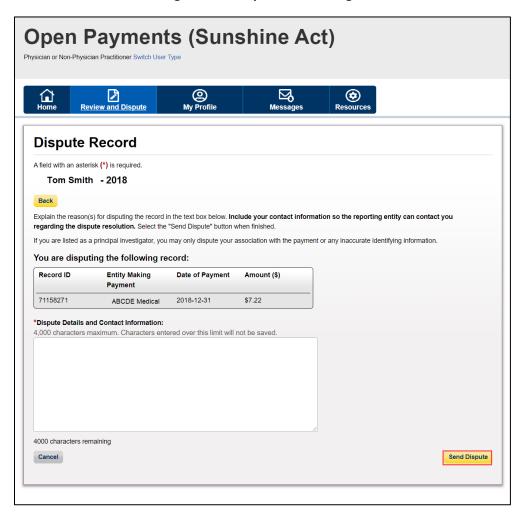


Figure 203: Dispute Record Page

<u>Step 4</u>: The "Dispute Confirmed" page displays a confirmation message that the dispute has been successfully initiated for that record. The initiator of the dispute will receive an email notification as well.

Open Payments (Sunshine Act) Physician or Non-Physician Practitioner Switch User Type 1 മ (4) ſ۵ **Review and Dispute** My Profile Resources Messages Dispute Confirmed **TOM SMITH - 2018** Continue You have successfully initiated the following dispute. An email has been sent to notify the reporting entity Date Dispute Initiated: 09/13/2018 Record ID Dispute ID Assigned **Entity Making Payment** 672652 1001220 ABCDE Medical Dispute Details and Contact Information: Include review and dispute contact information, such as email address and/or phone number

Figure 204: Dispute Confirmed Page

The covered recipient who initiated the dispute will receive an email notification from the Open Payments system if the reporting entity takes any action on the record. Also, the covered recipient can see any records that are undergoing editing by the entity under the "Deleted and In Progress Records" tab. Records under the "Deleted and In Progress Records" tab will be in either "In Progress" or "Deleted" statuses. The records "In Progress" will display under the "Available for Review and Dispute" tab once the entity has re-attested to them.

Section 4.5: Withdrawing Disputes

To withdraw a dispute on a record, follow these steps.

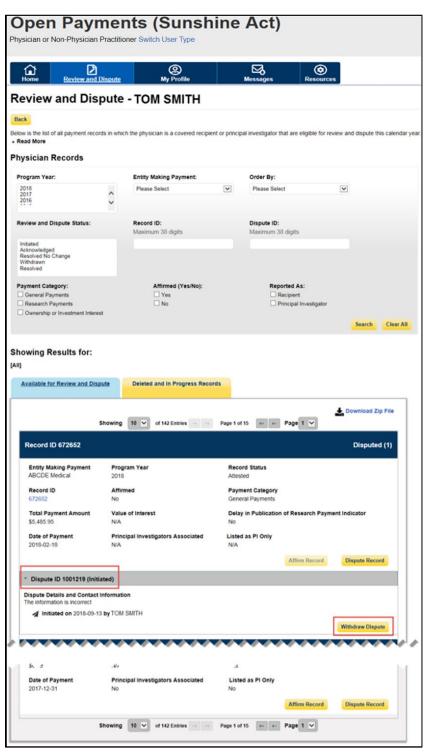
<u>Step 1</u>: On the "Review and Dispute" page, use the filtering tools to help find the records to be withdrawn, then select the "Search" button. All records available for withdrawing will be under the "Available for Review and Dispute" tab.

Note: Only records in "Initiated" and/or "Acknowledged" statuses will be available to withdraw.

Step 2: Select the "Dispute ID" link to view dispute details.

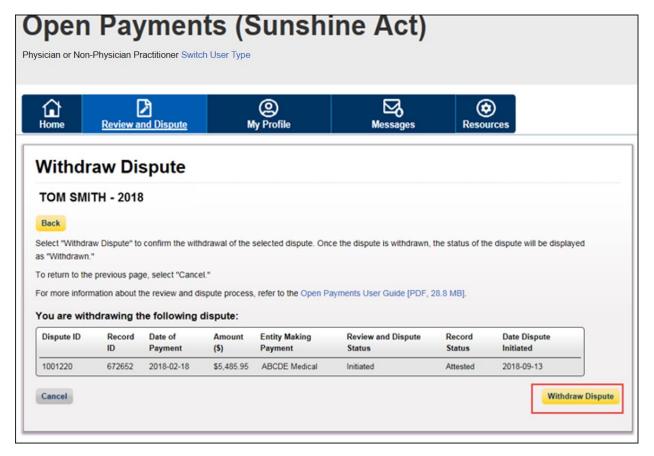
Step 3: Select the "Withdraw Dispute" button. "Withdraw Dispute" page is displayed.

Figure 205: Physician and NPP Review and Dispute Page Withdraw Dispute



<u>Step 4</u>: Review the information on the "Withdraw Dispute" page and select the "Withdraw Dispute" button.

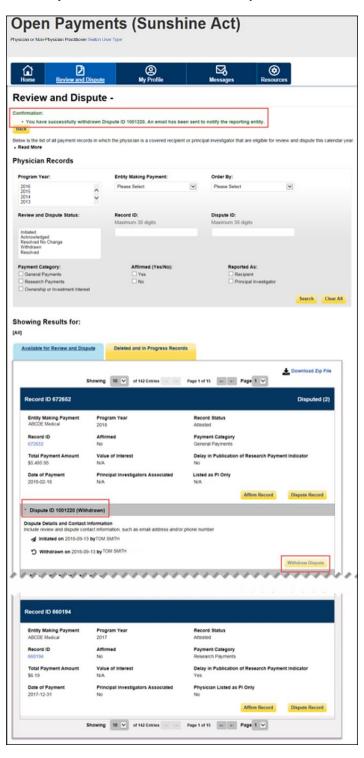
Figure 206: Withdraw Dispute Page



Step 5: A confirmation message is displayed that the dispute has been successfully withdrawn.

Note: Once a dispute has been withdrawn, the "Withdraw Dispute" button will be unavailable for selection.

Figure 207: Physician and NPP Review and Dispute Confirmation Page



Section 4.6: Exporting Data

Users can download records associated with them by selecting the "Download Zip File" link on the "Available for Review and Dispute tab of the "Review and Dispute" page.

Records are exported into a pipe ("|") delimited CSV format, compressed into a ZIP file. It will contain all data fields displayed in the table and other data elements related to the dispute, including the status of each record's dispute(s), if applicable.

Downloaded data files cannot exceed the acceptable limit of 20,000 records. If your record volume exceeds the record limit, apply filtering criteria to create smaller subsets of records and download them in multiple files.

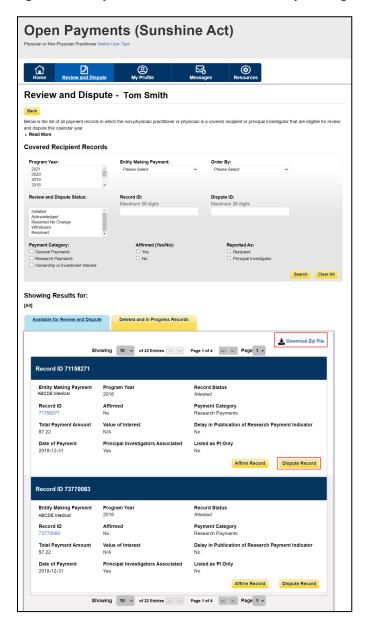


Figure 208: Physician and NPP Review and Dispute Page

Chapter 5: Messages and Utilities

This chapter on Messages and Utilities provides detailed information on how to navigate and use the Message and Utilities Tabs.

This chapter is divided into the following sections:

• **Messages Tab** contains information on how to search for system generated email messages received by the covered recipient physician or teaching hospital in the past 12 months.

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• **Utilities Tab** contains information on how teaching hospitals can use utilities to look up information in the Open Payments system. This functionality is only accessible by teaching hospital users.

Section 5.1: Messages

As a Covered Recipient user, you can view system generated messages sent to you within the past 12 months.

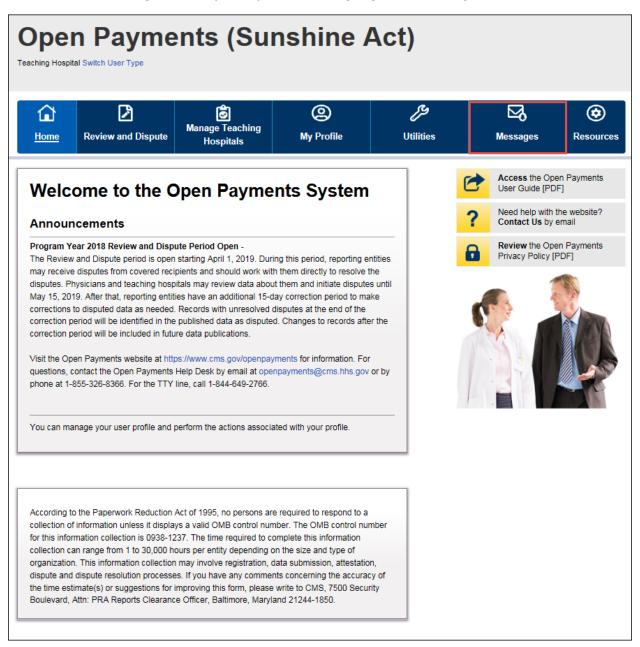
A system generated email is an email generated by the Open Payments System in response to any action performed in the Open Payments system. For example, during the registration process, once a covered recipient registers on the CMS Open Payments system, an email is sent out to the covered recipient confirming registration. This is a system generated email that is able to be viewed on the "Messages" tab.

The "Messages" tab is accessible from the CMS Open Payments home screen banner on the CMS Open Payments home page. Once you are redirected to the "Messages" tab from the CMS Open Payments home page, you can view the following searchable fields: (1) Teaching Hospital or Physician or NPP Name, (2) Record ID, (3) Payment Category, and (4) Message Category. All these fields are optional to refine your search.

5.1a: Instructions for searching messages

<u>Step 1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM credentials, navigate to the Open Payments home page, and select the "Messages" tab.

Figure 209: Open Payments Landing Page for Returning Users



Step 2: You will be brought to the "Messages" page.

Step 3: You can search results based on the following search criteria:

- Teaching Hospital or Physician or NPP Name
- Record ID (only applicable for Message Category of "Review and Dispute")

- Message Category
- Payment Category (only applicable for Message Category of "Review and Dispute")

Note: Selecting the "Search" button without selecting any search criteria, the Open Payments application searches on pre-populated value for the "Teaching Hospital or Covered Recipient Name" field. Selecting the "Clear All" button will remove all filter selection.

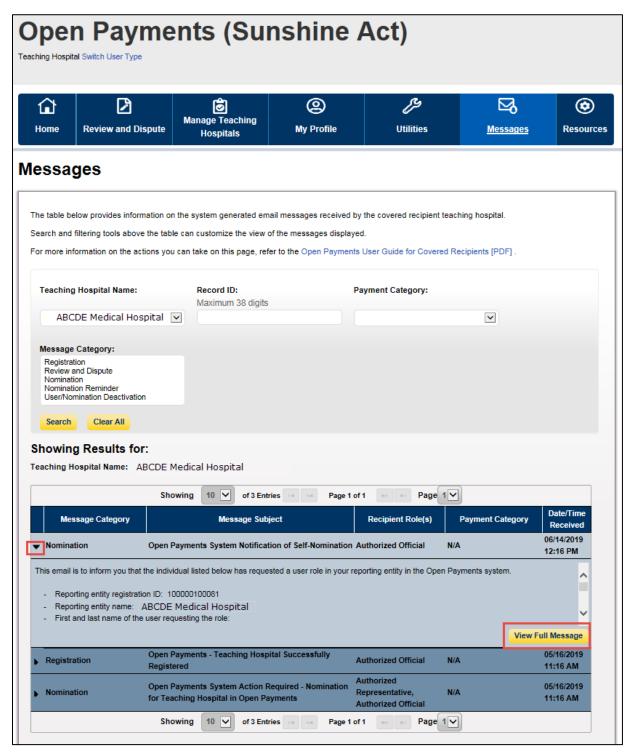
<u>Step 4:</u> Select the "Search" button to initiate the search. After selecting the "Search" button, a data table with the list of messages will display. This list of messages is sorted from newest to oldest. You will see an expandable row section that displays more details about all messages.

Open Payments (Sunshine Act) Teaching Hospital Switch User Type פק 罓 2 ◉ 屲 ō Manage Teaching **Review and Dispute** My Profile **Utilities** Home Resources Hospitals Messages The table below provides information on the system generated email messages received by the covered recipient teaching hospital. Search and filtering tools above the table can customize the view of the messages displayed. For more information on the actions you can take on this page, refer to the Open Payments User Guide for Covered Recipients [PDF]. Record ID: Payment Category: Teaching Hospital Name: Maximum 38 digits ABCDE Medical Hospital General Payments ~ Message Category: Registration Review and Dispute Nomination Nomination Reminder User/Nomination Deactivation Search Clear All

Figure 210: Messages Page

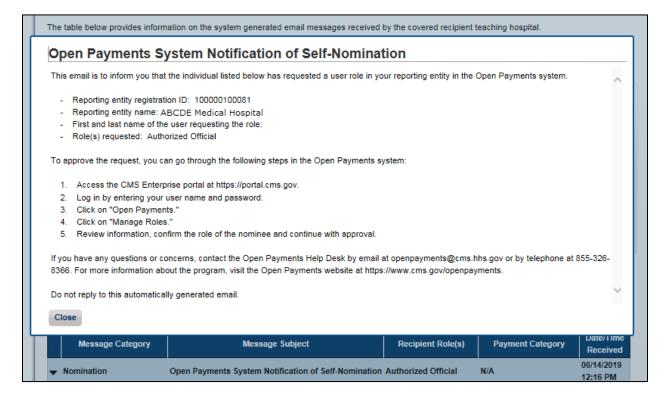
<u>Step 5:</u> Select the expandable arrow next to the message you wish to view. You will see an expandable view of the data pertaining to the message. You will also see a "View Full Message" button to view the full text of the message.

Figure 211: Messages Page Search Results



<u>Step 6:</u> Select the "View Full Message" to view the text of the message. You will see a pop-up window that displays the text.

Figure 212: View Full Message Pop-out



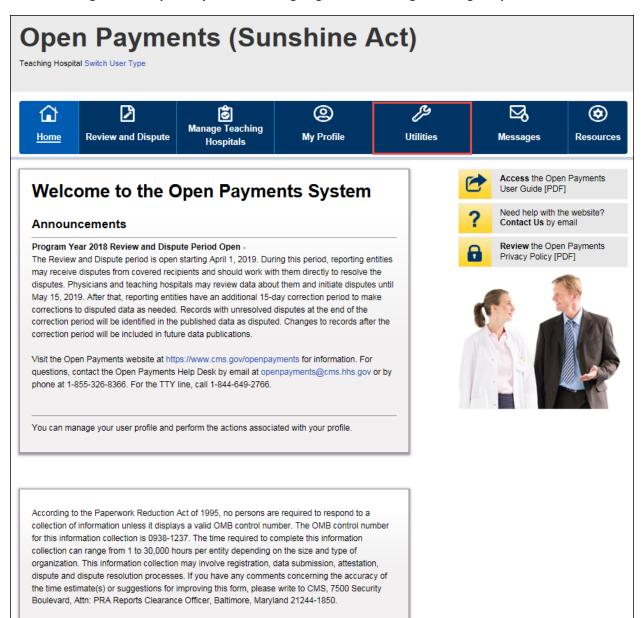
Section 5.2: Utilities

Teaching Hospital users have the ability to look up Physician's Open Payments Profile IDs that correspond to the National Provider Identifier for that physician.

5.2b: Instructions for Teaching Hospital Utility

Step <u>1:</u> Log in to the CMS Enterprise Portal at https://portal.cms.gov using your IDM credentials, navigate to the Open Payments home page, and select the "Utilities" tab.

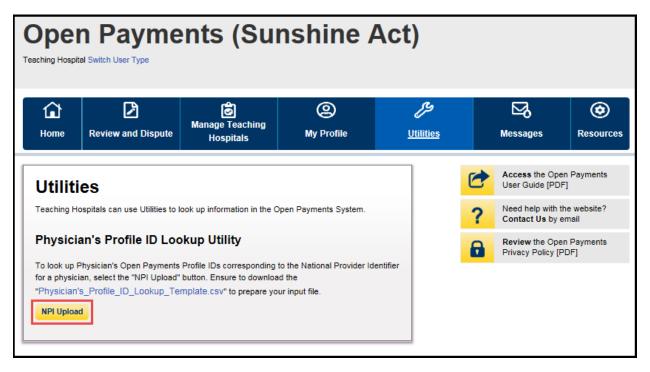
Figure 213: Open Payments Landing Page For Returning Teaching Hospital Users



Step 2: You will be brought to the "Utilities" page.

<u>Step 3:</u> On the Utilities page, download and fill out the "Physician's_Profile_ID_Lookup_Template.csv" via the link on the page to prepare your input file, into a pipe ("|") delimited CSV. The file cannot exceed the acceptable limit of 20,000 rows. The Header in the file must be valid (includes only PHYSICIAN_NPI) and the file should be virus free. Then select the "NPI Upload" button to navigate to the next page.

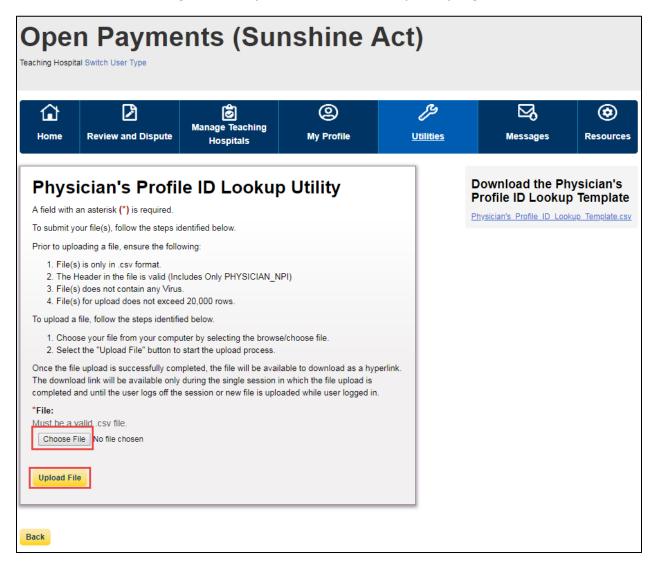
Figure 214: Utilities Page



Step 4: Select the "Choose File" button to select the completed input file.

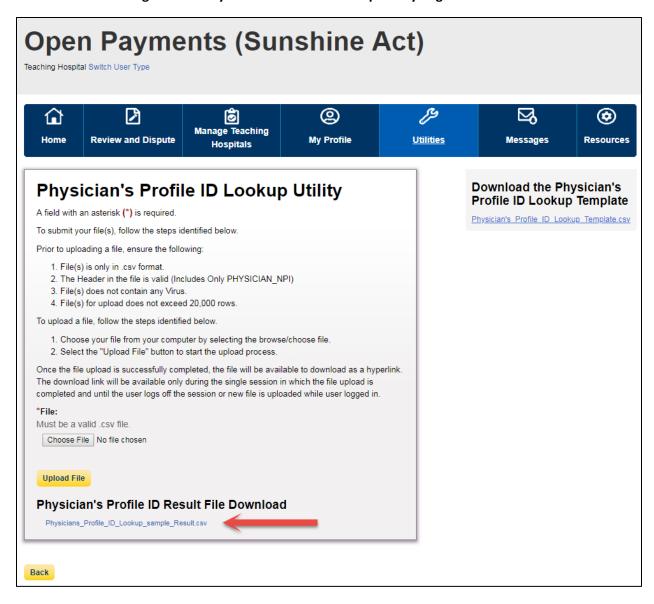
Step 5: Select the "Upload File" button.

Figure 215: Physician's Profile ID Lookup Utility Page



<u>Step 6:</u> You will see the results section that displays a downloadable link to the results at the bottom of the page. Select the results link to view more information about the physician's profile ID. The result link is available until you upload another file or log out of the Open Payments system.

Figure 216: Physician's Profile ID Lookup Utility Page Results File



Appendix A: Glossary of Terms for Open Payments

Note: The text of the Open Payments Final Rule (42 C.F.R. § 403.902) is available at https://www.cms.gov/OpenPayments/Downloads/Affordable-Care-Act-Section-6002-Final-Rule.pdf.

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, re-labelers, 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 concerning 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").

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 <u>Physicians</u> 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 NPPs (see *NPPs* 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.

Non-Physician Practitioners:

The Open Payments program expanded the definition of covered recipients to include the following NPPs:

 Physician Assistant (PA): an individual who performs such services as such individual is legally authorized to perform (in the State in which the individual performs such services) in accordance with State law (or the State regulatory mechanism provided by State law), and who meets such training, education, and experience requirements (or any combination thereof) as the Secretary may prescribe in regulations.

- Nurse Practitioner (NP): an individual who performs such services as such individual is legally authorized to perform (in the State in which the individual performs such services) in accordance with State law (or the State regulatory mechanism provided by State law), and who meets such training, education, and experience requirements (or any combination thereof) as the Secretary may prescribe in regulations.
- Clinical Nurse Specialist (CNS): an individual who is a registered nurse and is licensed to
 practice nursing in the State in which the clinical nurse specialist services are performed;
 and holds a master's degree in a defined clinical area of nursing from an accredited
 educational institution.
- Certified Registered Nurse Anesthetist (CRNA)/Anesthesiologist Assistant (AA): a
 certified registered nurse anesthetist licensed by the State who meets such education,
 training, and other requirements relating to anesthesia services and related care as the
 Secretary may prescribe. In prescribing such requirements the Secretary may use the
 same requirements as those established by a national organization for the certification
 of nurse anesthetists.
- Certified Nurse-Midwife (CNM): a registered nurse who has successfully completed a
 program of study and clinical experience meeting guidelines prescribed by the
 Secretary, or has been certified by an organization recognized by the Secretary

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, NPPs, 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 Payments website at https://www.cms.gov/OpenPayments/Resources. Note that there are multiple versions of the Submission Data Mapping Document based on program year. Consult the Submission Data Mapping Document for the program year of your records.

Free text fields allow all special characters on a standard U.S. keyboard, excepting ALT+NUMPAD ASCII Key characters. Below are the special characters allowed in free text fields.

| Special Character | Description | |
|-------------------|-------------|--|
| + | Plus sign | |
| & | Ampersand | |
| 1 | Apostrophe | |
| * | Asterisk | |
| @ | At sign | |
| \ | Backslash | |
| ٨ | Caret | |
| : | Colon | |
| | Comma | |

Figure 217: Special Characters Allowed in Free-Text Fields

| Special Character | Description |
|-------------------|-----------------------|
| \$ | Dollar sign |
| Space | Space character |
| = | Equal |
| ! | Exclamation mark |
| / | Forward slash |
| ` | Grave accent |
| > | Greater than |
| _ | Minus sign/hyphen |
| (| Left parenthesis |
| { | Left curly brackets |
| [| Left square brackets |
| < | Less than |
| % | Percent |
| | Period |
| # | Pound |
| ? | Question mark |
| II | Quotation marks |
|) | Right parenthesis |
| } | Right curly brackets |
|] | Right square brackets |
| ; | Semi-colon |
| | Pipe |
| ~ | Tilde |
| + | Plus sign |

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 218: Conversions for Foreign Language Characters

| Foreign Character | Convert to English Character |
|-------------------|------------------------------|
| À | Α |
| Á | Α |
| Â | Α |
| Ã | Α |
| Ä | Α |
| Å | A |
| È | Е |
| É | Е |
| Ê | E |
| Ë | E |
| Ì | I |

| Foreign Character | Convert to English Character |
|-------------------|------------------------------|
| ĺ | I |
| Î | I |
| Ï | I |
| Ò | 0 |
| Ó | 0 |
| Ô | 0 |
| Õ | 0 |
| Ö | 0 |
| Ø | 0 |
| Ù | U |
| Ú | U |
| Û | U |
| Ü | U |

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 https://www.cms.gov/OpenPayments/Resources.

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 physicians, NPPs, and teaching hospitals on Open Payments, including how to register, and review, and dispute attributed data.
- Date of document issuance: January 2024
- Replacement / Revision Status: Revision to previous versions
- Agency Identifier: CPI DASG/CPI DTP/DASG/CPI 3632
- **Summary of Document**: A one-stop-shop resource to help physicians, NPPs, and teaching hospitals understand in detail how the Open Payments system works.
- Citation to statutory provision/regulation applicable to this document:
 - o Statute citation: Social Security Act SEC. 1128G. [42 U.S.C. 1320a-7h]
 - o Rule citation: 42 C.F.R. §403.900-14