



# *Open Payments*

*Initial Publication of Program Year 2023 Data*



## OPEN PAYMENTS

CREATING PUBLIC TRANSPARENCY  
INTO INDUSTRY-PHYSICIAN  
FINANCIAL RELATIONSHIPS

*June 2024*  
*Data Publication Overview*

# Topics

- Open Payments Program Overview
- Publication Rules and Exceptions
- Accessing Published Data
- Online Search and Data Explorer Tools
- Available Resources

# Open Payments Program Overview

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# Open Payments Program Overview

- Open Payments is a statutorily-required, national disclosure program that promotes transparency and accountability by making information about the financial relationships between reporting entities and covered recipients available to the public
  - **Reporting Entities** –refers to pharmaceutical and medical device manufacturers and their distributors who are required to report payments and other transfers of value to Open Payments; also referred to as Applicable Manufacturers and Applicable Group Purchasing Organizations (GPOs)
  - **Covered Recipients** –refers to physicians, physician assistants, nurse practitioners, clinical nurse specialists, certified registered nurse anesthetists anesthesiologists assistants, certified nurse-midwives, and teaching hospitals receiving payments or other transfers of value from Applicable Manufacturers and/ GPOs
    - Non-Physician Practitioners (NPPs) – collectively refers to physician assistants, nurse practitioners, clinical nurse specialists, certified registered nurse anesthetists anesthesiologists assistants, and certified nurse-midwives provider types
- Data made available through the Open Payments program provides health care consumers with information to make informed health care decisions
- Disclosure of the financial relationships between the reporting entity and covered recipients is not intended to signify inappropriate relationships, and Open Payments does not prohibit such transactions

# Data Sources and Types

Reporting entities must enter detailed information about payments, other transfers of value made to covered recipients, and ownership or investment interests held by physicians or physicians' immediate family members into the Open Payments system

There are three major reporting categories:

- **General Payments:** Payments or other transfers of value made that are not in connection with research agreements or research protocol. General payments may include but are not limited to gifts, meals, honoraria, and travel
- **Research Payments:** Payments or other transfers of value made in connection with a research agreement or research protocol
- **Physician Ownership Information:** Information about physicians who have an ownership or investment interest in the reporting entity or who have an immediate family member holding such interest

# Program Year 2023 Timeline



- **Initial publication** contains data submitted and attested to by the Submission End Date (March 31, 2024) and reviewed, edited and re-attested by the Correction End Date (May 30, 2024)
- **Refresh publication** contains data submitted and attested to by the Submission End Date (March 31, 2024) and reviewed, edited and re-attested by the Calendar Year End Date (December 31, 2024)
- Both publications include re-publication of data from program years that are eligible for publication, including any changes made to the data after its most recent publication

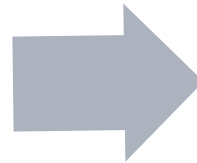
# Publication Rules and Exceptions

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# Program Year 2023 Publication Schedule

## June 2024 Publication: Initial Publication of Program Year 2023 data

- All records submitted and attested to by the submission deadline of March 31, 2024 are eligible for publication
- Data published is the latest attested-to data as of the end of the 60-day review, dispute, and correction period (April 1 – May 30)



## Early 2025 Publication: Refresh Publication of Program Year 2023 data

- A refresh of all records published in June 2024
- Data published is the latest attested-to data as of December 31, 2024
- Includes updates to records between the June 2024 publication and the end of 2024

Note: Both publications include re-publication of data from program years that are eligible for publication, including any changes made to the data after its most recent publication.

Refer to Review and Dispute tutorial located on the CMS Open Payments website Resources page to learn more about the review and dispute impact on data publication.



# Publication Exclusions and Limitations

- **Delay in Publication**
  - A record for which the reporting entity requested a delay in publication will not be published
  - Covered recipient review and dispute actions are voluntary and are not required under the statute
  - A delay in publication can be requested for a research record related to research or development of a new drug, biological, device, or medical supply; a new application of an existing drug, biological, device, or medical supply; or clinical investigations regarding a new drug, biological, device, or medical supply
- **Unsuccessful Matching**
  - Records that could not be successfully matched to a valid covered recipient will not be accepted by the Open Payments system and will not be published
  - Records with the recipient type “Non-Covered Recipient Entity” or “Non-Covered Recipient Individual” that lack at least one valid principal investigator will not be accepted by the Open Payments system and will not be published
- **Program Year Publication Eligibility**
  - Program years that have reached their fifth full year (including data publication and data refresh) of publication are closed and archived. Archived program years are not displayed on the Open Payments Search Tool, but are still publicly accessible via the Archived Dataset Page (<https://www.cms.gov/OpenPayments/Archived-Datasets>)

# Publication Exclusions and Limitations (cont'd)

- **Late Reporting**
  - Data submitted and attested after the submission deadline is considered late and will not be included in that year's initial publication or the next refresh publication
- **Change in covered recipient identifying information**
  - Records in which physician, non-physician practitioner or principal investigator identifying information is changed after the submission end date will not be included in the initial publication or the next data refresh publication. Such a change requires the deletion of the original record and submission of a new corrected record; after the submission closing date, the corrected record would be a late submission
  - These corrected records may be eligible for publication in the following calendar year's initial data publication
- **Deleted Records**
  - Records deleted prior to the end of the correction period for that year will not be published in the initial data publication or in any subsequent publications
  - Records deleted after the correction period, but prior to December 31 of the calendar year will be in the initial publication but not in the data refresh publication and subsequent publications

# Publication Exclusions and Limitations (cont'd)

- **Non-disputed records**
  - Records without disputes that are updated after the submission period will not be published in the initial data publication
  - The updated version of the record may be eligible for the data refresh publication, if it was resubmitted and attested by the modified-without-dispute cutoff date in November of that year
    - NOTE: The Modified-Without-Dispute Cutoff Date is the end date for undisputed record edits to be included in the refresh publication
  - Updates to non-disputed records that are resubmitted and attested after the modified-without-dispute cutoff date in November will not be published in the subsequent refresh publication, but may be eligible for publication in the following calendar year's publication
- Previously published records that were edited after their publication and not re-attested to by the end of the next correction period will not be published

# Accessing Published Data

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# Downloadable Data Files

- Downloadable Data Files are available at the CMS Open Payments website: <https://www.cms.gov/OpenPayments/Explore-the-Data/Dataset-Downloads.html>
- Each program year has an associated ZIP file, which contains:
  - Four (4) comma-separated values (CSV) files: General Payments, Research Payments, Ownership/Investment Interests, and Deleted and Removed Records
    - Note: The Program Year 2023 ZIP file has only three (3) CSV files, as it does not include a Deleted and Removed Records CSV file
  - One (1) README file, a TXT file that provides information about the CSV files
- Also available is the Covered Recipient Profile Supplement File, a ZIP file that contains:
  - One (1) CSV file with identifying information for physicians, non-physician practitioners and principal investigators who are associated with payments in published records and
  - One (1) README file, a TXT file that provides information about the CSV file
- Data files allow users to filter and export data in a variety of formats; identify parameters and build custom views; and aggregate the data for analysis

# Downloadable Data Files

## *“Change Type” Indicator*

- Each record in a CSV file includes a Change Type indicator. This indicator explains the record’s status in relation to previous publications
- The possible values for the Change Type indicator are:

Change_Type Value	Meaning of Value
NEW	The payment record was submitted during the current program year submission period and is being published for the first time
ADD	The payment record was submitted during a previous submission period but was not eligible to be published in that period; it is being published for the first time
CHANGED	Changes were made by the reporting entity to the payment record since the previous publication, which may include a change to a record’s dispute status; the current publication includes these changes
UNCHANGED	No changes were made to the payment record since the last publication

# Downloadable Data Files

## *“Deleted and Removed Records File”*

- A Deleted and Removed Records file is available for each program year that identifies records previously published by the Open Payments program that are not in the current publication due to their deletion or removal
  - The Downloadable Data File for Program Year 2023 will not include a Deleted and Removed Records file as none of its records have been previously published
- The only identifying information included in the Deleted and Removed Records file is Open Payments Record ID, Payment Type, and Payment Category for those records
- A program year’s Deleted and Removed Records file is included in that program year’s publication data download ZIP file
  - If any program year does not have deleted and removed records for the current publication, then the Deleted and Removed Records file will not be included in the program year’s publication data download ZIP file
- Records in a Deleted and Removed Records file also contain a “Change\_Type” field with one of two possible values:

Change_Type Value	Meaning of Value
<b>DELETED</b>	The previously published record has been deleted by the reporting entity
<b>REMOVED</b>	The previously published record has become ineligible for publication



# Online Search and Data Explorer Tools

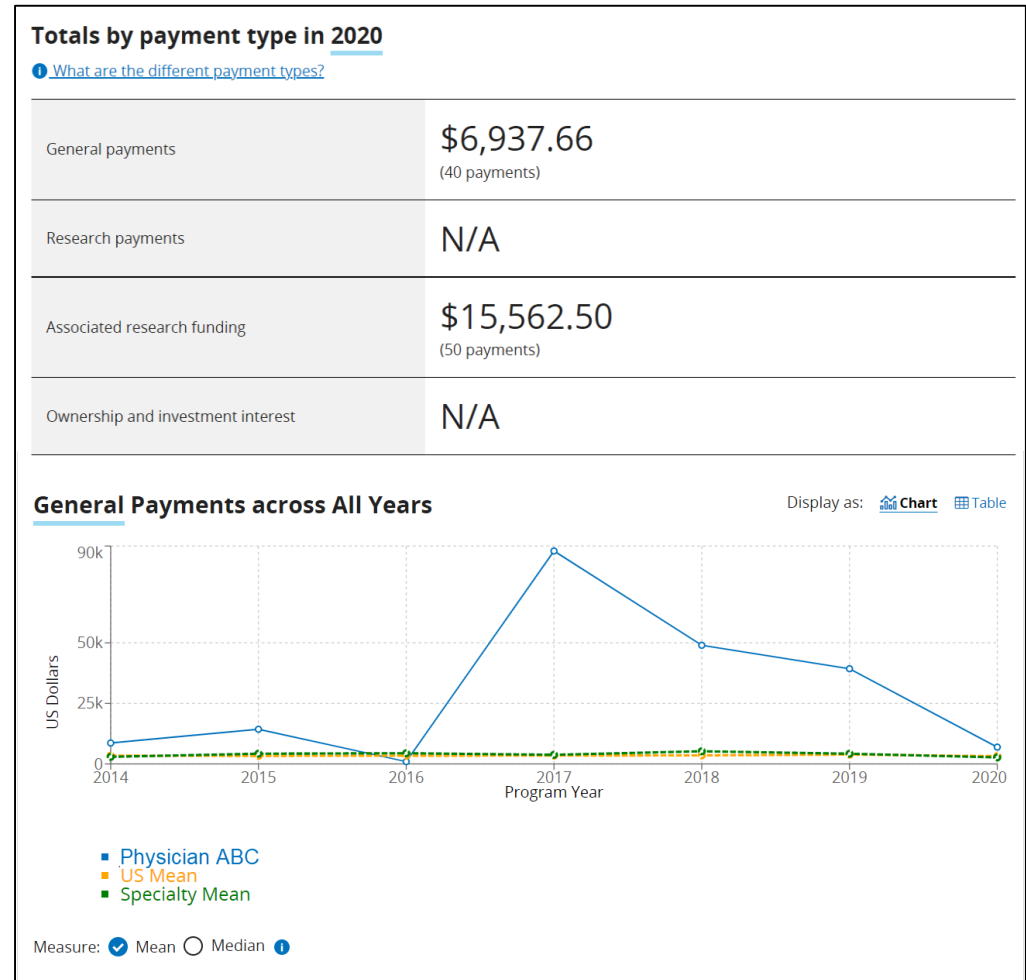
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# Online Tools

- **Search Tool** – Allows the user to search for a particular physician, non-physician practitioner, teaching hospital or company making payments and to view the data submitted by reporting entities
  - <https://openpaymentsdata.cms.gov/search>
  - Search for physicians, non-physician practitioners, teaching hospitals, and companies making payments
- **Data Explorer Tool** – Allows the user to view the full data sets
  - <https://openpaymentsdata.cms.gov/datasets>
  - Browse datasets
  - Search by physician, non-physician practitioner, teaching hospital, principal investigator, and reporting entity
  - Explore and filter the data

# Provider Profile Page

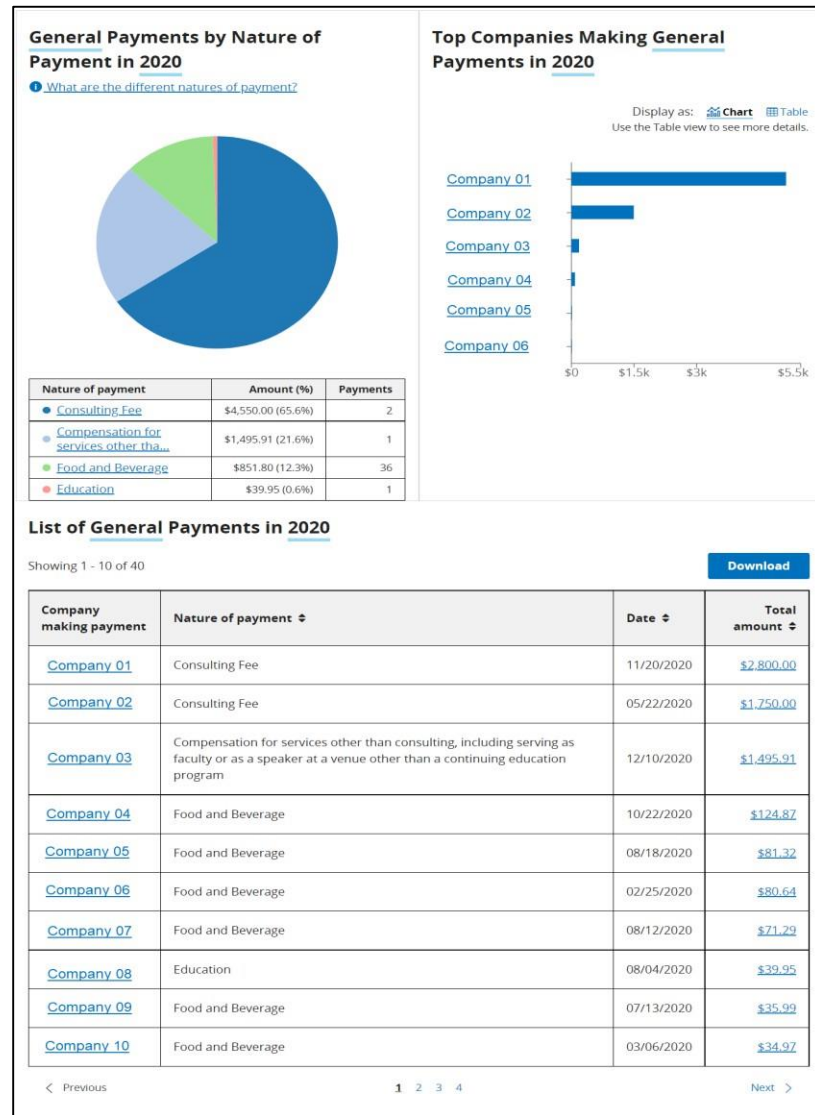
- The provider profile page displays information about the provider by year, payment type, and other available filters
- The provider is compared to other providers in the same specialty and all providers nationally



*For illustrative purposes only*

# Provider Profile Page (cont'd)

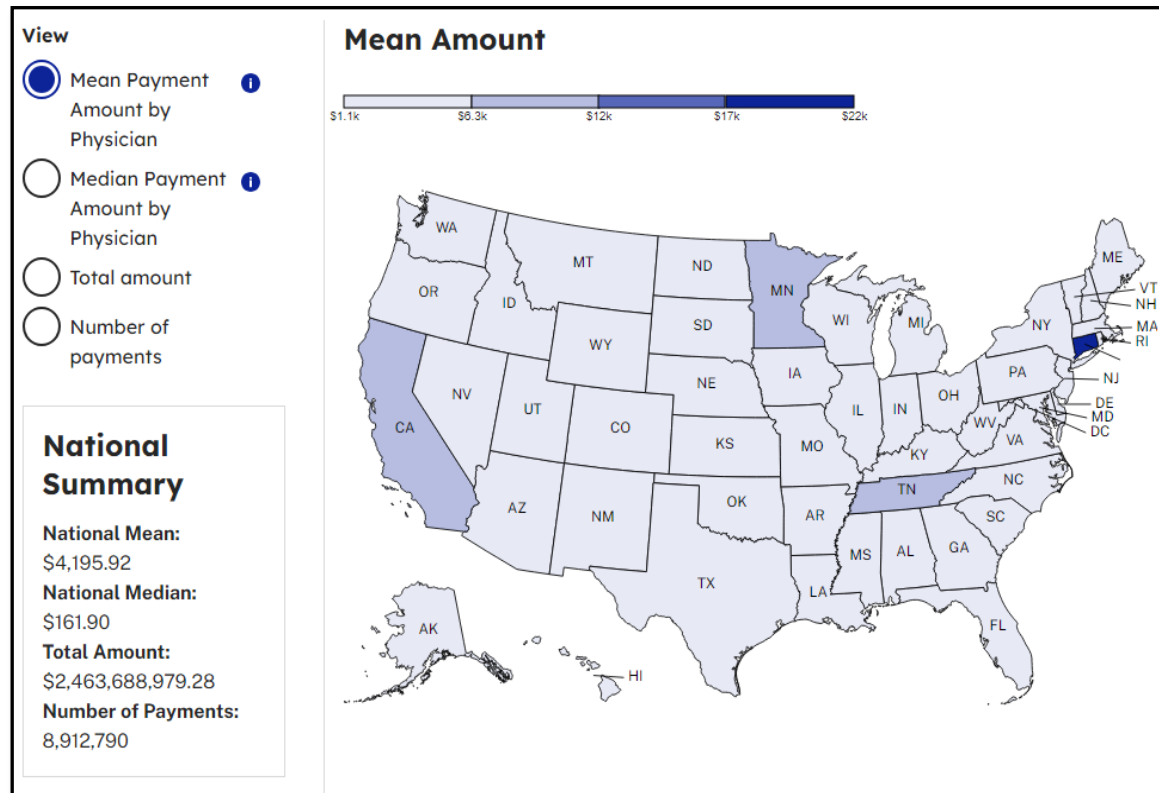
- The provider profile page provides data reported by Nature of Payment
- The user can view the list of payments and download data
- The top companies making payments to the provider are displayed with the amount reported



*For illustrative purposes only*

# Explore Payments by State

- The Summary of Payments by State page displays general and research payments received by physicians and non-physician practitioners in each state
- A payment is associated with a state based on the covered recipient's most recent practice address identified in CMS sources



*For illustrative purposes only*

# Available Resources

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# Available Resources

- Review available resources on the CMS Open Payments website Resources page at <https://www.cms.gov/openpayments/resources>
  - Open Payments Data Dictionary and Methodology Document
  - Open Payments FAQs
  - Open Payments User Guide For Reporting Entities, PDF page link: <https://www.cms.gov/files/document/open-payments-user-guide-reporting-entities.pdf>
  - Open Payments User Guide For Covered Recipients, PDF page link: <https://www.cms.gov/files/document/open-payments-user-guide-covered-recipients.pdf>
- For additional questions, contact the Open Payments Help Desk at:
  - [openpayments@cms.hhs.gov](mailto:openpayments@cms.hhs.gov)
  - 1-855-326-8366 or for TTY line call 1-844-649-2766
- For press inquiries, contact the CMS Office of Communications at:
  - [press@cms.hhs.gov](mailto:press@cms.hhs.gov)

# 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 to provide an overview of the Open Payments data publication process and guidelines.
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