



# *Open Payments*

## *Overview and Enhancements*

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

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

**January 2024**

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

# Outline

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

# Target Audience & Learning Objectives

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

# Key Terms

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

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

# Open Payments System Overview

# What is Reported?

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

# Who is Responsible for Reporting?

Applicable Manufacturers of covered products AND entities under common ownership with applicable manufacturers who also provide assistance and support are required to annually report to CMS.

- Operates in the United States
- Engages in the production, preparation, compounding, or conversion of a covered drug, device, biological, or medical supply  
This includes distributors or wholesalers that hold title to a covered drug, device, biological, or medical supply

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

- Operates in the United States
- Purchases, arranges for or negotiates the purchase of a covered drug, device, biological, or medical supply for a group of individuals or entities, but not solely for use by the entity itself

# Who is Reported On?

## Covered Recipient Physicians

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

## Physician Owners or Investors

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



# Who is Reported On? (Cont.)

## Covered Recipient Non-Physician Practitioners

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

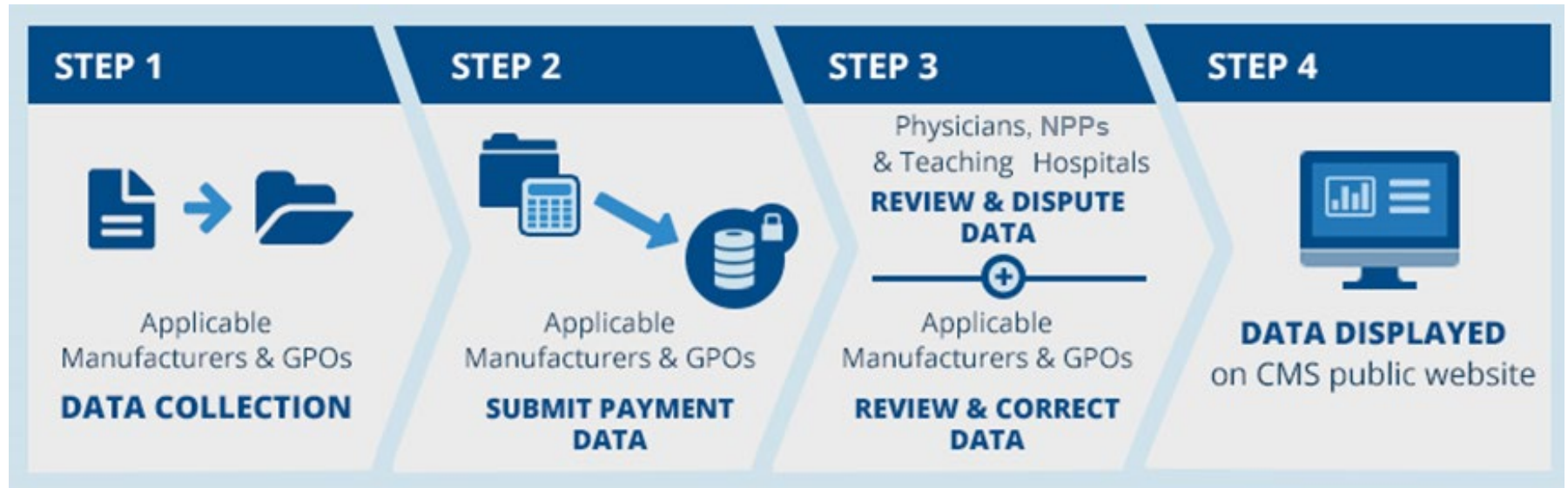
## Covered Recipient Teaching Hospitals

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

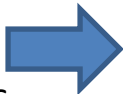
# Types of Payments

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

# Open Payments Process Flow



Reporting entities collect payment data for a program year, which runs from January 1 to December 31



Reporting entities submit their data for the program year to the Open Payments system



Covered recipients review and, if necessary, dispute submitted data. Reporting entities resolve disputes



Program year data is published for public viewing in accordance with the publication guidelines

# Program Year 2023 Timeline



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

**\*Anticipated date**

# Open Payments System Enhancements

## **Business Types updated to “Applicable Manufacturer – Physician –Owned Distributorship” and “Group Purchasing Organization - Physician Owned Distributorship”**

- Previous System Behavior

Previous System Behavior: Applicable Manufacturers and applicable Group Purchasing Organizations (GPOs) are required to register and create a profile for their entity within the Open Payments system in order to submit payments. During registration, the entity is required to select a “Business Type” that is auto-populated in the dropdown based on their selection of Reporting Entity Type of Applicable Manufacturer or GPO.

The Entity Business Type indicates the type of Applicable Manufacturer or applicable GPO registering in Open Payments. Entities selected whether the type is any of the following:

# Business Types updated to “Applicable Manufacturer – Physician –Owned Distributorship” and “Group Purchasing Organization - Physician Owned Distributorship”

-Previous System Behavior

- Applicable Manufacturer
  - If applicable manufacturer is selected, an entity must select one of the following business types:
    - applicable manufacturer-drugs/biologicals
    - applicable manufacturer-devices/medical supplies
    - applicable manufacturer-drugs/biologicals and devices/medical supplies
    - applicable manufacturer-physician-owned distributor
    - applicable manufacturer-hospital-owned distributor
    - applicable manufacturer-distributor/supplier (non-hospital, non-physician-owned)

# Business Types updated to “Applicable Manufacturer – Physician –Owned Distributorship” and “Group Purchasing Organization - Physician Owned Distributorship”

-Previous System Behavior

- Applicable GPO
  - If GPO is selected, an entity must select one of the following business types:
    - GPO-drugs/biologicals
    - GPO-devices/medical supplies
    - GPO-drugs/biologicals and devices/medical supplies
    - GPO-physician-owned
    - GPO-hospital-owned
    - GPO-hospital and physician-owned
    - GPO-non-hospital, non-physician-owned
    - GPO-government-owned

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

Home Submissions Review and Dispute Manage Entities My Profile Messages Resources

**Create Profile**

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

Access the Open Payments User Guide [PDF]

Need help with the website? Contact Us by email

Review the Open Payments Privacy Policy [PDF]

**Register Entity**

A field with an asterisk (\*) is required.

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

\*Entity's Legal Name:  
ABC Supply

\*Reporting Entity Type:  
 Applicable Manufacturer  
 Group Purchasing Organization

\*Business Type:  
Please Select

- Please Select
- GPO-drugs/biologicals
- GPO-devices/medical supplies
- GPO- drugs/biological and devices/medical supplies
- GPO-hospital-owned
- GPO-hospital and physician-owned
- GPO-non-hospital, non-physician-owned
- GPO-government-owned
- GPO-physician-owned distributor



# Business Types updated to “Applicable Manufacturer – Physician –Owned Distributorship” and “Group Purchasing Organization - Physician Owned Distributorship”

- Enhanced System Behavior

Enhanced System Behavior: The Open Payments system is updated to enhance the text used in the “Business Type” dropdown during Entity Registration and manage entity updates. Entities may select a type from any of the following:

- Applicable Manufacturer  
If applicable manufacturer is selected, an entity must select one of the following business types:
  - applicable manufacturer-drugs/biologicals
  - applicable manufacturer-devices/medical supplies
  - applicable manufacturer-drugs/biologicals and devices/medical supplies
  - applicable manufacturer-physician-owned distributorship
  - applicable manufacturer-hospital-owned distributor
  - applicable manufacturer-distributor/supplier (non-hospital, non-physician-owned)

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

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

**\*Entity's Legal Name:**  
Bob Chamira

**\*Reporting Entity Type:**  
 Applicable Manufacturer  
 Group Purchasing Organization

**\*Business Type:**  
Please Select  
Please Select  
Applicable manufacturer-drugs/biological  
Applicable manufacturer-devices/medical supplies  
Applicable manufacturer-drugs/biological and devices/medical supplies  
**Applicable manufacturer-physician-owned distributorship**  
Applicable manufacturer-hospital-owned distributor  
Applicable manufacturer-distributor/supplier (non-hospital, non-physician-owned)

This is a 9-digit number

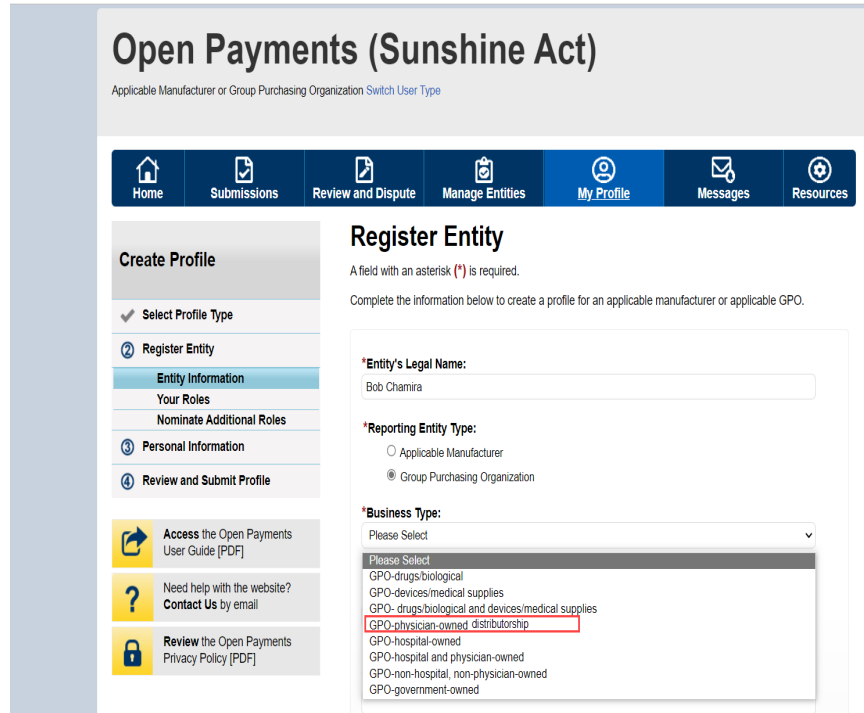
**\*URL of Parent Company:**  
http://www. or https://www. or www

**Business Address**  
Enter the business address below.

# Business Types updated to “Applicable Manufacturer – Physician –Owned Distributorship” and “Group Purchasing Organization - Physician Owned Distributorship” - Enhanced System Behavior

Enhanced System Behavior: The Open Payments system is updated to enhance the text used in the “Business Type” dropdown during Entity Registration and manage entity updates. Entities may select a type from any of the following:

- Applicable GPO  
If GPO is selected, an entity must select one of the following business types:
  - GPO-drugs/biologicals
  - GPO-devices/medical supplies
  - GPO-drugs/biologicals and devices/medical supplies
  - GPO-physician-owned distributorship
  - GPO-hospital-owned
  - GPO-hospital and physician-owned
  - GPO-non-hospital, non-physician-owned
  - GPO-government-owned



# Business Types updated to “Applicable Manufacturer – Physician –Owned Distributorship” and “Group Purchasing Organization - Physician Owned Distributorship”

- Enhanced System Behavior

Enhanced System Behavior: The Open Payments system is updated to enhance the text used in the “Business Type” dropdown during Entity Registration and manage entity updates. Entities may select a type from any of the following:

- Reporting entities

Reporting entities can also edit their Business Type after registration is complete by navigating to the Manage Entities tab within OPS and selecting “Entity Details”.

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

Home Submissions Review and Dispute **Manage Entities** My Profile Messages Resources

**Bob Chamira**

Entity Details Manage Roles

**Entity Information**

A field with an asterisk (\*) is required.

This page allows you to update your entity information. Select the "Submit" button to save your updates.

Entity's Registration ID: 200000960086

\*Entity's Legal Name:  
Bob Chamira

\*Reporting Entity Type:  
 Applicable Manufacturer  
 Group Purchasing Organization

\*Business Type:  
Applicable manufacturer-drugs/biological  
Please Select  
Applicable manufacturer-drugs/biological  
Applicable manufacturer-devices/medical supplies  
Applicable manufacturer-drugs/biological and devices/medical supplies  
**Applicable manufacturer-physician-owned distributorship**  
Applicable manufacturer-hospital-owned distributor  
Applicable manufacturer-distributor/supplier (non-hospital, non-physician-owned)

This is a 9-digit number

\*URL of Parent Company:

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

# New required 'Reason for Deletion' field for deletion of attested records

## – Previous and Enhanced System Behavior

Previous System Behavior: Applicable Manufacturers and GPO users could delete attested records within the Open Payments system. Attested records could be deleted by deleting files, uploading a file via Bulk File Upload, or manually deleting individual records. Applicable Manufacturers and GPO users were neither required nor able to provide a reason when deleting attested records.

Enhanced System Behavior: A new required field is added to the system when an Applicable Manufacturer or GPO user deletes files or attested records from the Open Payments system. The required field is titled “Reason for Deletion” and contains a dropdown list of reasons for deleting a file/attested record. Applicable Manufacturer/GPO users are required to select one or more reasons for deleting the files/attested record(s), depending on the method of deletion.

# New required 'Reason for Deletion' field for deletion of attested records

- Enhanced System Behavior

When an Applicable manufacturer/GPO user deletes a file or delete records using bulk file upload, one or more reasons can be selected.

## Bulk File Upload Delete

The screenshot shows the 'Upload Payments' interface. At the top, there is a navigation bar with icons for Home, Submissions, Review and Dispute, Manage Entities, My Profile, Messages, and Resources. The main content area is titled 'Upload Payments' and includes instructions for submitting payment files. Below the instructions are several dropdown menus: 'Payment Category' (General Payments), 'Reporting Entity' (ABCDE Medical), 'Program Year' (2023), and 'Resubmission File Indicator' (Delete). The 'Resubmission File Indicator' dropdown is highlighted with a red box. Below this is a 'Reason For Deletion' dropdown menu, also highlighted with a red box, containing several options: 'Correction to Covered Recipient Information (But to Same Covered Recipient)', 'Different Covered Recipient', 'Record Should Have Been Reported by a Different Applicable Manufacturer or Applicable GPO', 'Payment Had Not Been Furnished to the Covered Recipient', 'Disputed by Covered Recipient', 'Correction at CMS's Request', and 'Duplicate Record(s)'. Red arrows point to the 'Payment Had Not Been Furnished to the Covered Recipient' and 'Correction at CMS's Request' options. At the bottom, there is a 'File' section with a 'Choose File' button and the filename 'PY 2023 Ge... - VAL1.csv'.

## Deleting a File

The screenshot shows a 'Delete File' modal window. At the top, there is a 'Delete File' button highlighted with a red box. Below it, a message states: 'A field with an asterisk (\*) is required. Delete the following file and all its records:'. The file details are as follows: 'File ID: 15843', 'Original Upload File Name: Val1\_PY2021\_Reason\_for\_Deletion\_Testing\_v2.csv', 'Type of Submission: New Submission', 'Original /Resubmission Date: 12/14/2023 6:23 PM', 'Submitted By: Albert Kim', 'File Size: 4 KB', 'File Type: csv', 'Program Year: 2021', 'Payment Category: General Payments', 'File Status: Submitted with Errors', 'Number of Records in File: 5', 'Number of Records Uploaded: 5', 'Error Log: 15843\_General Payments Error(s)', and 'Warning Log: 15843\_General Payments Warning(s)'. Below these details is a 'Reason For Deletion' dropdown menu, highlighted with a red box, containing the same options as in the previous screenshot. Red arrows point to the 'Correction to Covered Recipient Information (But to Same Covered Recipient)' and 'Correction at CMS's Request' options. At the bottom, there is a 'Warning Log' section with a message: 'Deleting this file will delete all records it contains from the Open Payments system. These records will be deleted even if they had been edited or re-submitted after the initial file submission. Note that deleting records with "Attested" status requires agreement and re-attestation by the reporting entity's attester. Attested records will not be deleted from the Open Payments system until re-attestation takes place.' Below this is a note: 'One or more reasons for deleting the file must be selected. If "Other" is selected, an alternate reason must be provided in the field Other Reason for Deletion.'

# New required 'Reason for Deletion' field for deletion of attested records

- Enhanced System Behavior

When an Applicable Manufacturer/GPO deletes attested records manually, the user will be required to select a single reason before proceeding.

## Delete an Attested Record(s)

The screenshot shows a web application interface with a 'Confirm' dialog box. The dialog contains the following text:

**Confirm**

Are you sure you want to delete the selected record(s)? Deleting records with "Attested" status requires agreement and re-attestation by the reporting entity's attester. Attested records will not be deleted from the Open Payments system until re-attestation takes place.

A reason for deleting the record(s) must be selected. If "Other" is selected, an alternate reason for deleting the record(s) must be entered in the field "Other Reason for Deletion". The reasons for deletion apply only to attested records.

Select "Delete" to delete the record(s). Select "Cancel" to cancel the action.

\*Reason For Deletion:  
Different Covered Recipient

Buttons: Cancel, Delete

Background interface elements include:

- License State: Please Select
- License Number: 99999
- Address State: 9999
- Zip Code: 9999
- Teaching Hospital Name: [Input Field]
- Record Warnings: [Info Icon]
- Buttons: Search, Clear All, Cancel Deletion, Return to Attester, Delete Selected, Return to Submitter
- Showing Results for: Record Status: Attested
- Showing 10 of 6 Entries Page 1 of 1 Page 1

Select All	File ID	Record ID	Actions	Home System Payment ID	Payment Date	Amount(\$)	Recipient Type	Recipient	Record Status	Marked for Deletion	Reason For Deletion
<input checked="" type="checkbox"/>	N/A	96937191	<a href="#">View</a> <a href="#">Edit</a> <a href="#">Copy</a>		20230601	\$330.00	Teaching Hospital	Southeast Health Medical Center	Attested	No	

# Review and Dispute Contact Information updated for Reporting Entities to require specific fields

– Previous System Behavior

Previous System Behavior: When an Applicable Manufacturer/GPO user registered or updated the information of a reporting entity, the user was required to enter contact information for the purposes of Review and Dispute. This contact information is displayed to Covered Recipient users for inquiries or disputes regarding submitted payments or other transfers of value.

**Open Payments (Sunshine Act)**

**Create Profile**

- Account Profile View
- Register Entity
- Entity Information
- View Rates, Non-Financial Additional Rates
- Financial Information
- Review and Submit Profile
- Access the Open Payments User Guide (PDF, 173 KB)
- Need help with the website? Contact us by email
- Review the Open Payments Privacy Policy (PDF, 102 KB)

**Register Entity**

A Not-Yet-Active Entity (NYA) is required. Complete the information below to create a profile for an applicable manufacturer or applicable GPO.

**Entity's Legal Name:** [Text Field]

**Reporting Entity Type:** [Radio Buttons: Applicable Manufacturer, Applicable Organization]

**\*Business Type:** [Radio Buttons: Applicable Manufacturer (Drug/Device), Other]

**Food & Drug Administration (FDA) Establishment Identifier:** This is a 10-digit number. [Text Field]

**Data Universal Numbering System (DUNS) Number:** This is a 9-digit number. [Text Field]

**\*URL of Parent Company:** [Text Field]

**Business Address**

Enter the business address below.

**\*Country:** [Dropdown]

**\*Business Address, Line 1:** [Text Field]

**Business Address, Line 2:** [Text Field]

**\*City Name:** [Text Field] **State:** [Dropdown]

**\*Zip Code:** [Text Field] **Business Telephone Number:** [Text Field]

**Business Ownership Information**

Enter the business ownership information below.

**\*Type of Ownership:** [Radio Buttons: Manufacturer, Other]

**\*Taxpayer Identifier Number (TIN)/Employer Identification Number (EIN):** [Text Field]

**\*Doing Business As (DBA) Name:** [Text Field]

\*This entity information is submitted on a non-annual report (i.e., one entity reports on behalf of another entity).  
\*This is the entity's TIN and is submitted on a non-annual report.  
\*A DBA (Doing Business As) name is not required on a non-annual report.

**Points of Contact**

The Not-Yet-Active point of contact will receive important notification emails regarding Open Payments.  
Being entered as a point of contact does not register that individual in the Open Payments system or give the individual access to the system. Individual contact should be registered in the system if they wish to access the Open Payments system.

**Primary Point of Contact**

**Name:** [Text Field] **Business Telephone Number:** [Text Field]

**First Name:** [Text Field] **Last Name:** [Text Field]

**\*Title in the Entity:** [Text Field] **Business Email Address:** [Text Field]

**Backup Point of Contact**

**Name:** [Text Field] **Business Telephone Number:** [Text Field]

**First Name:** [Text Field] **Last Name:** [Text Field]

**\*Title in the Entity:** [Text Field] **Business Email Address:** [Text Field]

**Contact Information for Review and Dispute**

The "Contact Information" section is used to provide contact information for individuals from your entity who are working with the dispute resolution process. The fields include additional instructions for physicians and mailing requests.

Note: The contents of the "Contact Information" box will be visible to the covered recipients associated with the records during the review process. The contacts will be displayed exactly as entered in this box.

**\*Contact Information:** [Text Area]

1000 characters maximum. Information is posted upon the site and will be public. Please contact Help Desk.

255 characters remaining

[Submit] [Cancel] [Back]

# Update R&D Contact Information for Reporting Entities to require specific fields

– Enhanced System Behavior

Enhanced System Behavior: Specific review and dispute contact information fields are added to the Register Entity page.

Reporting Entities are required to enter information in each field when registering or recertifying. A summary of changes is listed below:

- Specific review and dispute contact information fields replace the current free-form text box. Reporting entities are required to enter information in each field for a primary point of contact. Reporting entities also have the option to enter information for a backup point of contact. Validations are introduced to the required fields and UI error messages will be displayed if the fields fail validation.
- Review and dispute contact information on-screen text is updated for applicable manufacturer and GPO users to provide additional instructions when registering and updating an entity.
- The new review and dispute contact information fields are displayed to Covered Recipients on the review and dispute Record ID page.

**Open Payments (Sunshine Act)**  
Update the Manufacturer or Group Primary Reporting Information (Covered Recipient)

**JMTest LLC**

**Entity Details** Manage Entity

**Entity Information**  
A new web or mobile CTR is required.  
This page allows you to update your entity information. Select the "Submit" button to save your updates.

Entity's Registration ID: 0000000000  
Entity's Legal Name: JMTest LLC

Reporting Entity Type: Applicable Manufacturer  
Business Type: Group Reporting Organization

Point & Ship Administration (PSA) Establishment Identifier: This is a 10-digit number.

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

URL of Parent Company: URL/Domain, or HTTP Address, or none

**Business Address**  
Enter the business address below.

Country: United States

Business Address, Line 1: Enter your street name

Business Address, Line 2:

City Name: State: Zip Code: Business Telephone Number: Business Email Address:

**Business Ownership Information**  
Enter the business ownership information below.

Type of Ownership: Corporation  
Registration Identifier Number (This/Employee Identification Number (EIN): 00-00000000

Using Reporting As (PSA) Name: JMTest LLC

Has this entity's information been submitted in a consolidated report (i.e., one entity reports on behalf of another entity)?  
 Yes, this entity will not be submitted in a consolidated report.  
 No, this entity will not be submitted in a consolidated report.  
 I don't know whether the entity data will be submitted in a consolidated report.

**Points of Contact**  
The two required points of contact will receive important instructions during registration.

**Primary Point of Contact**

Name: JM	Business Telephone Number: 000-000-0000 or Maximum 20 digits, use one zero
Title at the Entity: Owner	Business Email Address: jmtest@jctest.com

**Backup Point of Contact**

Name: JM	Business Telephone Number: 000-000-0000 or Maximum 20 digits, use one zero
Title at the Entity: Owner	Business Email Address: jmtest@jctest.com

**Contact Information for Review and Dispute (Updated On-Screen Text)**

**Primary Point of Contact**

Name: JM	Title at the Entity: Owner
Business Telephone Number: 000-000-0000 or Maximum 20 digits, use one zero	Business Email Address: jmtest@jctest.com
Business Postal Address: 000-000-0000	

**Backup Point of Contact**

Name: JM	Title at the Entity: Owner
Business Telephone Number: 000-000-0000 or Maximum 20 digits, use one zero	Business Email Address: jmtest@jctest.com
Business Postal Address: 000-000-0000	

Business Email Address: jmtest@jctest.com



# Remove the ability to delay General Payments

– Previous System Behavior

Previous System Behavior: Applicable manufacturers and GPOs could request a delay to the publication of both General and Research payments. A delay in publication can be requested annually up to a period of four years from the date of the payment. Payments can be delayed either manually or via Bulk File Upload. Delayed records are included in the next publication following the non-renewal or expiration of the delay.

Records are eligible for a delay in publication only if they relate to one of the following criteria:

- Research or development of a new drug, device, biological, or medical supply.
- Research or development of a new application of an existing drug, device, biological, or medical supply.
- Clinical investigations regarding a new drug, device, biological, or medical supply.

The screenshot shows the 'Open Payments (Sunshine Act)' interface. The main heading is 'Add General Payment'. Below the heading is a progress bar with steps: Overview, Covered Recipient Demographics, Products, Payments, General Information (highlighted in yellow), and Review & Save. The 'General Record Information' section contains several required fields: 'Physician Ownership Indicator' (radio buttons for Yes/No), 'Third Party Payment Recipient Indicator' (dropdown), 'Charity Indicator' (dropdown), and 'Delay in Publication of Research Payment Indicator' (dropdown). The 'Delay in Publication of Research Payment Indicator' field is highlighted with a red box, and an arrow points from this box to a callout box below the form. The callout box contains the text: 'Users can no longer delay General Payments'. At the bottom of the form, there are 'Cancel', 'Back', and 'Continue to Review' buttons, along with 'Contact Us' and 'Privacy Policy' links.

Users can no longer delay General Payments

# Remove the ability to delay General Payments

– Enhanced System Behavior

Enhanced System Behavior: The functionality to delay the publication of General Payments is removed and is effective for all program years.

- All General Payments previously eligible for a delayed publication will not be renewed and the records will be included in the June 2024 publication.
- For all records going forward, regardless of the program year of the record, general payment records cannot be delayed. This means that even if a company delayed a general payment record in Program Year 2022, it will no longer be able to be delayed in Program Year 2023.

The read-only “Delay in Publication of Research Payment Indicator” field will also be removed from the Review & Save page for all General Payments.

**Open Payments (Sunshine Act)**  
Applicable Manufacturer or Group (Purchase Organization) Search User Type

Home Submissions Review and Dispute Manage Entities My Profile Messages Resources

**Add General Payment** User Guide

Overview Covered Recipient Demographics Products Payments General Information Review & Save

**Review and Save Page**

Review the payment information below. If there are any errors, navigate to the respective screen and update as necessary.

**Payment Submission Information**  
Entry Making Payment Registration Name: JM/TEST, LLC  
Program Year: 2021 Payment Category: General Payments Home System Payment ID:

**Covered Recipient Demographics Information**  
Covered Recipient Type: Physician  
Name: Michael Angelo Viggiani  
Business Address:  
1388 Mono Street Suite 200  
San Luis Obispo, CA 93401  
United States  
Email Address:  
Primary Type: NPI: Taxonomy Code: 111M0010X  
Medical Doctor  
Covered Recipient State License(s):  
01-23

**Associated Drug, Device, Biological, or Medical Supply Information**  
Related Product Indicator: N

**General Payment or Other Transfer of Value Information**  
Total Amount of Payment: \$0.00 Date of Payment: 20210301  
Number of Payments Included in Total Amount: 3  
Form of Payment or Transfer of Value: In-kind items and services  
Nature of Payment or Transfer of Value: Compensation for serving as faculty or as a speaker for a medical education program

**General Record Information**  
Physician Ownership Indicator: N  
Third Party Payment Recipient Indicator: No Third Party Payment  
Name of Third Party Entity Receiving Payment or Transfer of Value:  
Third Party Equals Covered Recipient Indicator:  
Charity Indicator: No  
Contextual Information: **Delay in Publication of Research Payment Indicator: No Delay in Publication**

Back Save Record

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# Remove the ability to delay General Payments

– Enhanced System Behavior

The functionality to delay the publication of General Payments is removed and is effective for all program years.

## Changes to AM/GPO Review and Dispute

- From the AM/GPO Review & Dispute tab, the Review and Dispute page will be updated to display a value of “No” for all General Payments under the “Delay in Publication of Research Payment Indicator” column

Review and Dispute - ABCDE Medical - 2021

The table below contains the record(s) submitted by this reporting entity that have been disputed by physicians, teaching hospitals, non-physician practitioners, and physician non-physician practitioner principal investigators. Submitters for the reporting entity can take actions on the dispute(s) and edit the record under dispute. Once a disputed record is edited and resubmitted, the associated dispute(s) on the record will move into Resolved status.

Please note: To view the entire table, use the horizontal scroll bar below the table.

You may export your search results by selecting the "Download Zip File" link. The downloadable file will be a CSV file compressed into a ZIP file. The file will contain all data fields displayed in the table below and other data elements related to the record. A download file can include up to 20,000 records. To download more than 20,000 records, adjust the filter criteria to create smaller subsets of records and download them in multiple files.

To view all fields for an individual record, select the "View" link under the Action column or the "Record ID" link in the Record ID column in the table below.

To perform any of the following actions, select the check box next to the Action column:

- To acknowledge a dispute, select the check box for the corresponding record and then select the "Acknowledge Dispute" button. This confirms that you have received the dispute. To acknowledge all the disputes use the "Select All" check box. When a dispute is acknowledged, an email notification will be sent to the covered recipient who initiated the dispute.
- To resolve a dispute, select the "OK" link in the Action column of that record. An email notification will be sent to the covered recipient when a record is being edited by the entity or when the record is deleted to resolve the dispute.
- To declare that the dispute has been resolved in accordance with the Final Rule without changing the data, select the check box next to the record and then select the "Resolved No Change" button.

To return to the previous page, select the "Back" button.

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

Applicable Manufacturer or Applicable GPO's Disputed Records

Dispute ID: Maximum 38 digits  
Record ID: Maximum 38 digits  
Home System Payment ID: Maximum 38 digits  
File ID: Maximum 38 digits

Covered Recipient First Name  
Covered Recipient Last Name  
Teaching Hospital Name: Please Select

Review and Dispute Status:  
Initiated  
Acknowledged  
Resolved No Change  
Withdrawn  
Resolved

Marked for Deletion:  
 Yes  
 No

Payment Category:  
 General Payments  
 Research Payments  
 Ownership or Investment Interest

Recipient Type:  
 Physician  
 Teaching Hospital  
 Non-Physician Practitioner

Download Disputes Zip File Search Clear All

Showing Results for:  
[All]

Showing 33 of 1 Entries Page 1 of 1 Page 1

Select All	Action	Record ID	Home System Payment ID	Dispute ID	Recipient	Total Payment Amount or Dollar Amount Invested	Value Of Interest	Review and Dispute Status	Date Dispute Initiated	History of Disputes	Delay in Publication of Research Payment Indicator	Marked for Deletion
<input type="checkbox"/>	<a href="#">View</a> <a href="#">Edit</a>	R0000000	3385	Random Rows	678,767.22		Initiated	2021-07-27	<a href="#">View</a>	No	Yes	

Showing 33 of 1 Entries Page 1 of 1 Page 1

# Remove the ability to delay General Payments

– Enhanced System Behavior

The functionality to delay the publication of General Payments is removed and is effective for all program years.

## Changes to Covered Recipient Review and Dispute

- From the Covered Recipient Review & Dispute tab, the Review and Dispute page will be updated to display a value of “N/A” on the “Delay in Publication of Research Payment Indicator” field for all General Payments

**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: 2021, 2020, 2019, 2018

Entity Making Payment: Please Select

Order By: Please Select

Review and Dispute Status: Initiated, Acknowledged, Resolved No Change, Withdrawn, Resolved

Record ID: Maximum 38 digits

Dispute ID: Maximum 38 digits

Payment Category:  General Payments,  Research Payments,  Ownership or Investment Interest

Affirmed (Yes/No):  Yes,  No

Reported As:  Recipient,  Principal Investigator

Showing Results for: [All]

Showing 10 of 32 Entries Page 1 of 4 Page 1

Record ID 71158271		
Entity Making Payment	Program Year	Record Status
ABCDE Medical	2018	Attested
Record ID	Affirmed	Payment Category
71158271	No	General Payments
Total Payment Amount	Value of Interest	Delay in Publication of Research Payment Indicator
\$7.22	N/A	N/A
Date of Payment	Principal Investigators Associated	Listed as PI Only
2018-12-31	Yes	No

# General Payments Nature of Payment update - ability to submit ownership records removed

– Previous System Behavior

Previous System Behavior: The Open Payments system requires the Nature of Payment to be specified during the submission of General Payments.

**For PY2013 – PY2020, entities may select whether the type is any of the following from the Nature of Payment Categories:**

- "1" = Consulting Fee;
- "2" = Compensation for services other than consulting, including serving as faculty or as a speaker at a venue other than a continuing education program;
- "3" = Honoraria;
- "4" = Gift;
- "5" = Entertainment;
- "6" = Food and Beverage;
- "7" = Travel and Lodging;
- "8" = Education;
- "9" = Charitable Contribution;
- "10" = Royalty or License;
- "11" = Current or prospective ownership or investment interest
- "12" = Compensation for serving as faculty or as a speaker for an unaccredited and non-certified continuing education program.
- "13" = Compensation for serving as faculty or as a speaker for an accredited or certified continuing education program.
- "14" = Grant;
- "15" = Space rental or facility fees (teaching hospital only);

**For PY2021 and Onwards, entities may select whether the type is any of the following from the Nature of Payment Categories:**

- "1" = Consulting Fee;
- "2" = Compensation for services other than consulting, including serving as faculty or as a speaker at a venue other than a continuing education program;
- "3" = Honoraria;
- "4" = Gift;
- "5" = Entertainment;
- "6" = Food and Beverage;
- "7" = Travel and Lodging;
- "8" = Education;
- "9" = Charitable Contribution;
- "10" = Royalty or License;
- "11" = Current or prospective ownership or investment interest
- "14" = Grant;
- "15" = Space rental or facility fees (teaching hospital only);
- "16" = Compensation for serving as faculty or as a speaker for a medical education program
- "17" = Debt forgiveness
- "18" = Long term medical supply or device loan
- "19" = Acquisition

# General Payments Nature of Payment update - ability to submit ownership records removed

– Previous System Behavior

The Nature of Payment is a required field for general payment submission. One of the above listed Nature of Payment categories needs to be selected in both manual and bulk submission. If there is no option selected, then the user will get an error message.

# General Payments Nature of Payment update - ability to submit ownership records removed

– Enhanced System Behavior

Enhanced System Behavior: Open Payments updated the Nature of Payment categories to remove “11” = Current or prospective ownership or investment interest category for Program Year 2023-onwards. *This payment category is still available and editable for Program Years 2018 – 2022.*

- Beginning with Program Year 2023, “Current or prospective ownership or investment interest” is not available as a Nature of Payment option for General Payment records.
- The Nature of Payment category, “Current or prospective ownership or investment interest” continues to be reportable and editable for Program Years 2018 – 2022.

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

Home Submissions Review and Dispute Manage Entities My Profile Messages

Resources

### Add General Payment

Overview Covered Recipient Demographics Products **Payments** General Information Review & Save

#### General Payment or Other Transfer of Value Information

A field with an asterisk (\*) is required.  
Enter the required payment or transfer of value information.

\*Total Amount of Payment: 00000.00 and maximum 12 digits \*Date of Payment: yyyymmdd \*Number of Payments Included in Total Amount:

\*Form of Payment or Transfer of Value: Please Select \*Nature of Payment or Transfer of Value: Please Select

Please Select

- Consulting Fee
- Compensation for services other than consulting, including serving as faculty or as a speaker at a venue other than a continuing education program
- Honoraria
- Gift
- Entertainment
- Food and Beverage
- Travel and Lodging
- Education
- Charitable Contribution
- Royalty or License
- Grant
- Compensation for serving as faculty or as a speaker for a medical education program
- Debt forgiveness
- Long term medical supply or device loan
- Acquisitions

Back Continue

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“Current or prospective ownership or investment interest” removed for Program Year 2023-onwards.

# Context Field added for Teaching Hospital Payment

- Previous and Enhanced System Behavior

Previous System Behavior: Previously, there was not a teaching hospital payment context field, nor was there a requirement for applicable manufacturers to provide a description of the payment or transfer of value.

Enhanced System Behavior: A “Context of Teaching Hospital Payment” text box field is added and required for Reporting Entities to use when submitting a payment or transfer of value to a Teaching Hospital for Program Year 2023 and onwards.

Reporting Entities are required to enter information in the field when submitting any General or Research Payment associated with a Teaching Hospital.

If the Teaching Hospital Context Field is not completed, the user will receive an error message and will not be able to proceed with submitting the record until this field is completed .

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

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**Add General Payment** [User Guide](#)

Overview Covered Recipient Demographics Products **Payments** General Information Review & Save

**General Payment or Other Transfer of Value Information**

A field with an asterisk (\*) is required.  
Enter the required payment or transfer of value information.

\*Total Amount of Payment: 99999.99 and maximum 12 digits  
\*Date of Payment: yyyyymmdd  
\*Number of Payments Included in Total Amount:

\*Form of Payment or Transfer of Value: Please Select  
\*Nature of Payment or Transfer of Value: Please Select

**\*Context of Teaching Hospital Payment :** 500 characters maximum. Characters entered over this limit will not be saved.  
500 characters remaining

Cancel Back Continue

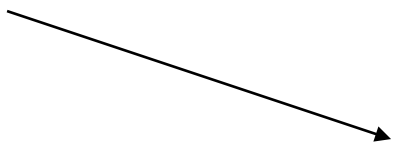
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A “Context of Teaching Hospital Payment” text box field is added and required for Reporting Entities to use when submitting a payment or transfer of value to a Teaching Hospital for Program Year 2023 and onwards.

### The enhancement impacts:

- Changes to Manual Submission
- Changes to Bulk File Upload
- Changes to Review and Dispute
  - Changes to AM Review and Dispute
  - Changes to Teaching Hospital Review and Dispute



# Ability to track deleted records and link them to new records submitted

- Previous and Enhanced System Behavior

Previous System Behavior: There was not a way within the Open Payments system to track the previously deleted records and link them with newly submitted records.

Enhanced System Behavior: The Open Payments system is enhanced with a feature to track deleted records and link them to new records.

The following enhancements are made to the Open Payments system.

- Two new fields are introduced as input fields to be received from the users in both the UI and Bulk submission template.
  - The first new field is a Yes/No indicator to tell if the record was previously attested and then deleted, and then later newly submitted
  - If the value of the indicator is selected as “Yes”, then, a new text field is displayed for the reporting entity to provide the Record ID of the previously deleted record.

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

Home Submissions Review and Dispute Manage Entities My Profile Messages Resources

**Add Payment** [User Guide](#)

A field with an asterisk (\*) is required.  
To enter a payment, transfer of value, or ownership or investment interest, enter the following information.

\*Payment Category: Please Select  
\*Entity Making Payment Registration Name: Please Select  
\*Program Year: Please Select  
Home System Payment ID:

\* Was This Payment Previously Submitted, Attested And Then Deleted?  
Please Select  
Yes  
No

Cancel [Continue](#)

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# Ability to track deleted records and link them to new records submitted

- Previous and Enhanced System Behavior

The Open Payments system is enhanced with a feature to track deleted records and link them to new records.

- **The enhancement impacts:**

- Manual Submission – Add Payment page, Review & Submit page, Overview page, View page, Edit Payment page, Copy payment page, and Submissions page
- Bulk Submission templates – General, Research and Ownership templates for all program years
- UI error/warning messages and error/warning codes

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

Home Submissions Review and Dispute Manage Entities My Profile Messages Resources

**Add Payment** [User Guide](#)

A field with an asterisk (\*) is required.  
To enter a payment, transfer of value, or ownership or investment interest, enter the following information.

*Payment Category:	*Entity Making Payment Registration Name:	*Program Year:	Home System Payment ID: ?
General Payments	ABCDE Medical	2023	
*Was this payment previously submitted, attested and then deleted?	*Previously Deleted Record ID: ?		
Yes	10000		

Cancel Continue

# Allow Reporting Entities to indicate they have no records to report for a Program Year

- Previous and Enhanced System Behavior

Previous System Behavior: Applicable manufacturers and GPOs could recertify within the Open Payments system however, they did not have the option to indicate or attest that they do not have any reportable payments or transfers of value or ownership and investment interest to report for the current or previous program year(s).

Enhanced System Behavior: The Open Payments system is enhanced to allow active applicable manufacturers and GPO officers and attestors to indicate that their entity do not have any payments or transfers of value or ownership and investment interest to report starting with Program Year 2023 for all Program Years.

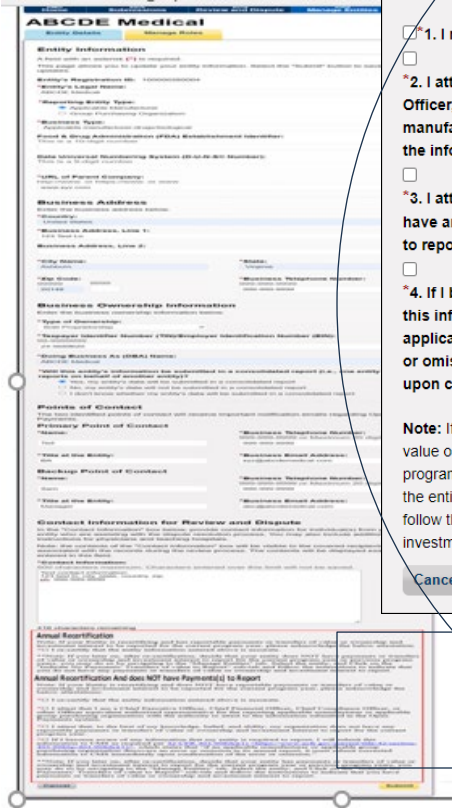
# Allow Reporting Entities to indicate they have no records to report for a Program Year

- Enhanced System Behavior

The Open Payments system is enhanced to allow active applicable manufacturers and GPO officers and attestors to indicate that their entity do not have any payments or transfers of value or ownership and investment interest to report starting with Program Year 2023 for all Program Years.

### Update to “Entity Details” tab:

- During recertification, the AM/ GPO officers either confirm that the details of the entity’s profile in the Open Payments system are accurate or update the entity’s profile information if the profile in Open Payments is inaccurate or outdated.
- Starting with Program Year 2023, they can also indicate that their entity does or does not have any reportable payments or transfers of value or ownership and investment interest to report for current program year.



**Annual Recertification AND does NOT have Payment(s) to Report**

If your Entity is recertifying and does NOT have reportable payments or transfers of value or ownership and investment interest to be reported for the current program year, please acknowledge the below attestations:

\*1. I re-certify that the entity information entered above is accurate.

\*2. I attest that I am a Chief Executive Officer, Chief Financial Officer, Chief Compliance Officer, or other Officer equivalent authorized representative for the reporting applicable manufacturer or applicable group purchasing organization with the authority to attest to the information submitted in the Open Payments system.

\*3. I attest that, to the best of my knowledge, belief, and ability, my organization does not have any reportable payments or transfers of value or ownership and investment interest to report for the selected program year.

\*4. If I become aware of any information that my entity is required to report, I will submit this information to CMS as required per 42 CFR 403.908(h)(1), which states that "if an applicable manufacturer or applicable group purchasing organization discovers an error or omission in its annual report, it must submit corrected information to CMS immediately upon confirmation of the error or omission."

**Note:** If you later on, after re-certification, decide that your entity has payments or transfers of value or ownership and investment interest to report for the current program year or previous program years, you may update the indicator by navigating to the "Manage Entities" tab. Select the entity, and Click on the "Indicate No Payments/ Transfers of value to Report" sub-tab and follow the instructions to indicate that you have payments or transfers of value or ownership and investment interest to report.

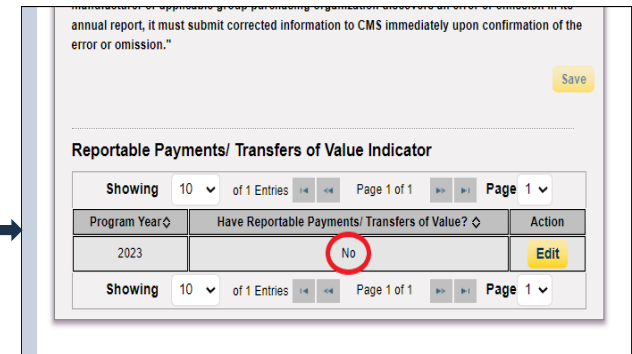
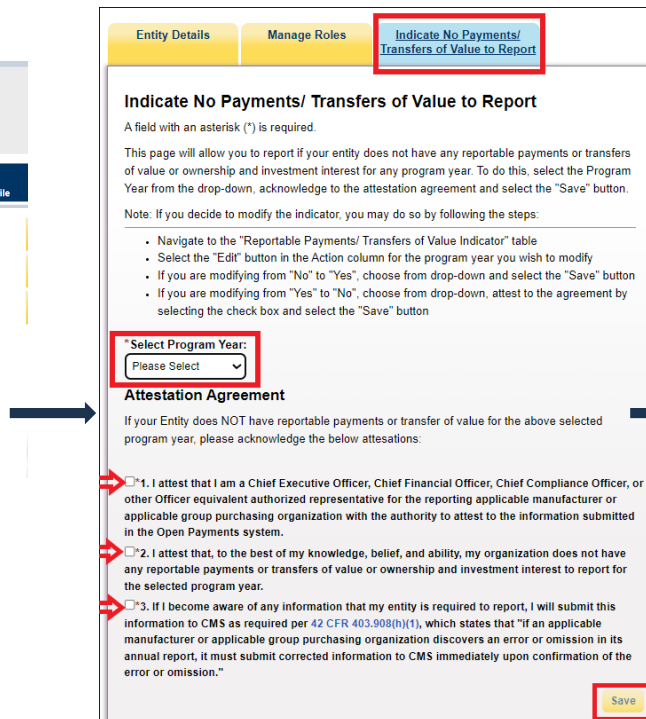
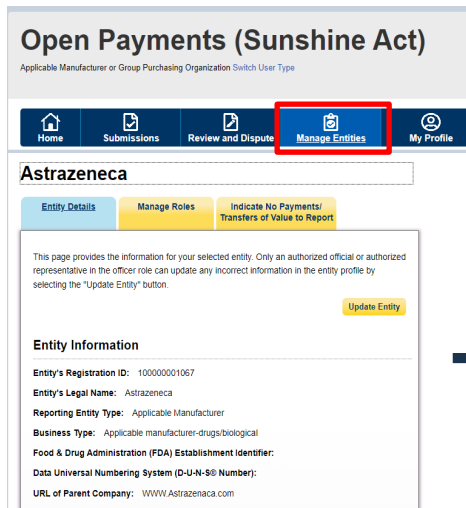
# Allow Reporting Entities to indicate they have no records to report for a Program Year

- Enhanced System Behavior

The Open Payments system is enhanced to allow active applicable manufacturers and GPO officers and attesters to indicate that their entity do not have any payments or transfers of value or ownership and investment interest to report starting with Program Year 2023 for all Program Years.

## Manage Entity page:

The “Manage Entities” page will be updated to include a new tab called “Indicate No Payments/ Transfers of Value to Report”. The AM/GPO officer can navigate to this sub-tab and add a no Payments/ Transfers of Value indicator (No PTOV) for a Program Year.



# Allow Reporting Entities to indicate they have no records to report for a Program Year

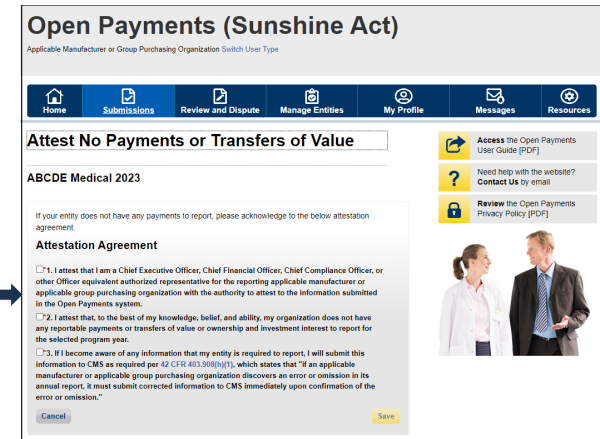
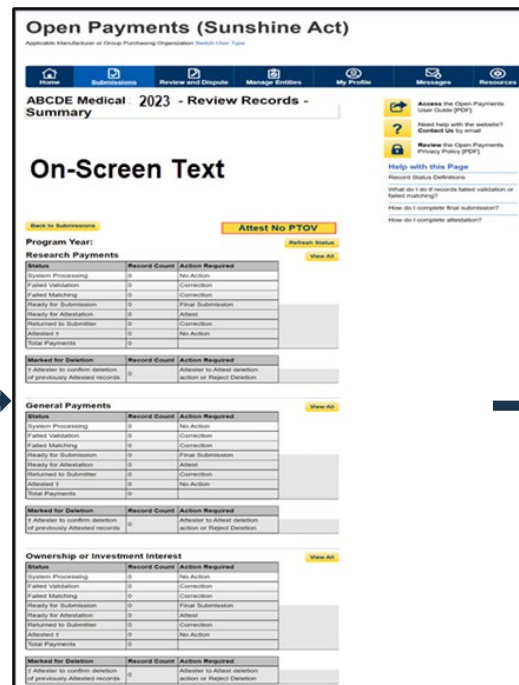
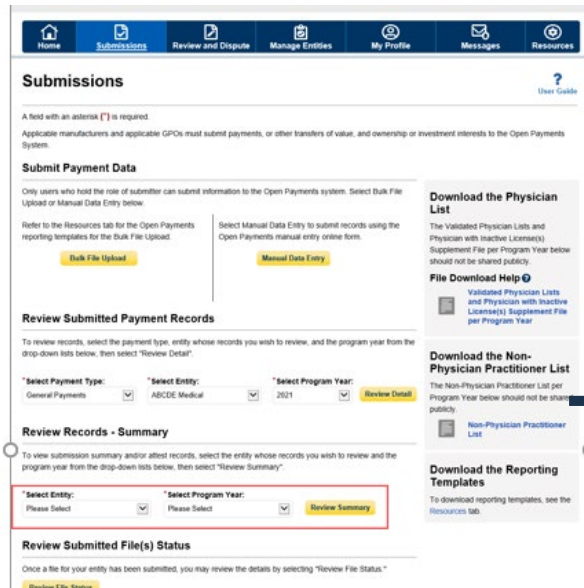
- Enhanced System Behavior

The Open Payments system is enhanced to allow active applicable manufacturers and GPO officers and attestors to indicate that their entity do not have any payments or transfers of value or ownership and investment interest to report starting with Program Year 2023 for all Program Years.

## Attestation:

The attestation page will have the below changes.

- Under “Review Records Summary” page, a new button is introduced for the attestors to attest to NO PTOV.
- Upon clicking the new button, it will lead to a new page “Attest No Payments or Transfers of Value”



# Update NDC Drug Resource File available to AM/GPOs to include 11 digit NDC

The Open Payments outreach documentation for Drug Name and National Drug Code (NDC) Reference Data will be enhanced to include a new column for the 11-digit NDC code. This new column will be added to the current .csv Drug Name and NDC reference file that is made available to AM/GPOs on the CMS resources page (<https://www.cms.gov/OpenPayments/Downloads/Drug-Name-and-NDC-Reference-Data.zip>).

Column Name	Column Description
<b>10NDCPACKAGECODE</b>	The 10-Digit labeler code, product code, and package code. (Corresponds to the “10 digit National Drug Code (NDC) of Associated Covered Drug or Biological” element in the Open Payments System.)
<b>11NDCPACKAGECODE</b>	The 11-Digit labeler code, product code, and package code. (This information is provided for reference only and does not correspond to any Open Payments payment submission elements.)
<b>ProprietaryName</b>	The trade name of the drug product. (Corresponds to the “Name of Associated Covered Drug or Biological” element in the Open Payments System).
<b>ProprietaryNameSuffix</b>	A suffix to the proprietary name. (This information is provided for reference only and does not correspond to any Open Payments payment submission elements.)
<b>NonProprietaryName</b>	Sometimes called the generic name. (This information is provided for reference only and does not correspond to any Open Payments payment submission elements.)
<b>LabelerName</b>	Name of company. (This information is provided for reference only and does not correspond to any Open Payments payment submission elements.)



# Application User Roles expanded to support updates with Remote Identity Proofing (RIDP)

Previous System Behavior: Previously, users selected one role to gain access to the Open Payments application, and the users were required to pass RIDP.

- Role: Applicable Manufacturer, GPO, Physician, Non-Physician Practitioner, or Teaching Hospital.

Enhanced System Behavior: Now there are three user roles to gain access to the Open Payments system with one role limited to RIDP verification. The roles and descriptions are as follows:

**Reporting Entity Officer or Teaching Hospital Authorized Official Role:** Only US users that will be 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.

**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.

**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 will be 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.

# Next Steps and Available Resources

# Next Steps for Reporting Entities

New or Returning?	Next Steps
New Reporting Entities	<ul style="list-style-type: none"><li>• Register in IDM and request access to the Open Payments system</li><li>• Register self and reporting entity (if applicable) in the Open Payments system</li><li>• Assign user roles</li></ul>
Returning Reporting Entities	<ul style="list-style-type: none"><li>• Ensure IDM account has not been deactivated due to inactivity and reset password if necessary</li><li>• Recertify reporting entity information and provide required review and dispute contact information</li><li>• Confirm user roles</li></ul>

# Next Steps for Covered Recipients

New or Returning?	Next Steps
New Physicians, Non-Physician Practitioners and Teaching Hospitals	<ul style="list-style-type: none"><li>• Register in IDM and request access to the Open Payments system</li><li>• Register self and teaching hospital (if applicable) in the Open Payments system</li></ul>
Returning Physicians, Non- Physician Practitioners and Teaching Hospitals	<ul style="list-style-type: none"><li>• Ensure IDM account has not been deactivated due to inactivity and reset password if necessary</li><li>• No other action is required at this time</li></ul>

# Available Resources

- Review available resources on the Resources page of the CMS Open Payments website at <https://www.cms.gov/OpenPayments/Resources>
  - Open Payments User Guide for Reporting Entities
  - Open Payments User Guide for Covered Recipients
  - Tutorials
  - Quick Reference Guides
- If you are looking for information on the Covered Recipient expansion, new nature of payment categories, or device IDs, refer to the tutorial for “Expansion Of Covered Recipient, Device and Nature Of Payment” on the CMS resources page
- Register for CMS email notifications via the Open Payments website to receive e-mail updates about Open Payments
- For additional questions, contact the Open Payments Help Desk:
  - Email: [openpayments@cms.hhs.gov](mailto:openpayments@cms.hhs.gov)
  - Phone: 1-855-326-8366 or for TTY line call 1-844-649-2766

# Disclosure

- **Disclaimer:** The contents of this document do not have the force and effect of law and are not meant to bind the public in any way, unless specifically incorporated into a contract. This document is intended only to provide clarity to the public regarding existing requirements under the law.
- **Activities/persons addressed by this document:** Guidance for Reporting Entities and Covered Recipient on overview of the Open Payments system and enhancements.
- **Date of document issuance:** January 2024
- **Replacement / Revision Status:** Revision to previous version
- **Agency Identifier:** CPI DASG/CPI DTP/DASG/CPI 3620
- **Summary of Document:** An overview of the Open Payments program year enhancements that were implemented in July 2023.
- **Citation to statutory provision / regulation applicable to this document:**
  - **Statute citation:** Social Security Act SEC. 1128G. [42 U.S.C. 1320a-7h]
  - **Rule citation:** 42 C.F.R. §403.900-14