

Open Payments System Quick Reference Guide

Consolidated Reporting

Introduction

An applicable manufacturer or applicable group purchasing organization (GPO)(hereafter collectively referred to as “reporting entities” under common ownership with other reporting entities may submit and attest to data in the Open Payments system on behalf of those other reporting entities. This process is called consolidated reporting. This quick reference guide provides a high-level overview of this process. Consolidated reporting can only be completed through bulk file upload and is not available through manual entry.

Prerequisites

- User is registered in Centers for Medicare & Medicaid Services (CMS) Identity Management system (IDM) and has obtained access to the Open Payments system.
- All reporting entities in the consolidated report are registered in the Open Payments system.
- The individual submitting the consolidated report holds the user role of submitter for all reporting entities included in the consolidated report.

Actions

Perform Consolidated Reporting

1. Create bulk file uploads for the payment types (general, research, or ownership/investment) that contain payment data from all of the reporting entities included in the consolidated report. For each record:
 - a) Set the “Consolidated Report Indicator” field to “Y.”
 - b) Provide the name and Open Payments registration ID for the reporting entity submitting the consolidated report in the fields “Applicable Manufacturer or Applicable GPO Name” and “Applicable Manufacturer or Applicable GPO Registration ID.”
 - c) Provide the name and Open Payments registration ID for the reporting entity that made the individual payment or other transfer of value in the fields “Applicable Manufacturer or Applicable GPO Making Payment Name” and “Applicable Manufacturer or Applicable GPO Making Payment Registration ID.” This may be the same as the entity submitting the file.
2. Submit the bulk files normally. Refer to the quick reference guide “Bulk File Upload” for instructions.

Next Steps

- Perform final submission and attestation of the submitted records. Refer to the quick reference guide “Final Submission and Attestation”
- Resolve disputes initiated by physicians, non-physician practitioners (NPPs), teaching hospitals, and principal investigators

Additional Resources

All data submission resources can be found on the Resources for Reporting Entities page of the CMS Open Payments website at <https://www.cms.gov/priorities/key-initiatives/open-payments/resources/reporting-entities>.

The “Data Submission and Attestation,” section of the Open Payments User Guide for Reporting Entities, provides detailed, step-by-step instructions for file uploads and consolidated reporting.

Quick reference guides relevant to consolidated reporting include:

- Bulk File Upload
- Record Deletion
- Identifying Validation and Matching Errors
- Correcting Validation and Matching Errors
- Payment Category Page
- Final Submission and Attestation
- Acknowledging Disputes and Resolving Disputes With No Changes to Data
- Correcting and Resolving Disputes

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.
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