Open Payments System Quick Reference Guide
Data Submission & Attestation Documents and Resources

Introduction

The Open Payments system allows reporting entities (i.e., applicable manufacturers and applicable group purchasing organizations) to submit and attest to payments or other transfers of value made to covered recipients (i.e., physicians/non-physician practitioners (NPP) (including principal investigators), and teaching hospitals). The system also allows for the disclosure of ownership or investment interests information held by physician owners, investors, or their immediate family members. This quick reference guide provides a list of resources available to assist in the data submission process for both bulk file and manual submissions.

Prerequisites

- None

Available Documents and Resources

All of the resources listed in this guide are available on the Resources page of the Centers for Medicare & Medicaid Services (CMS) Open Payments website at https://www.cms.gov/OpenPayments/Resources unless otherwise specified.

Sample Files

Users that hold the submitter role may find these sample files within the Open Payments system.

Resource Name	Description
PY 2021 and onwards CSV Sample File: General Payments	A CSV sample file used to submit general payments for Program Year 2021 and onwards. **ONLY used for General records dated on or after January 1, 2021.**
PY 2021 and onwards CSV Sample File: Research Payments	A CSV sample file used to submit research payments for Program Year 2021 and onwards. **ONLY used for Research records dated on or after January 1, 2021.**
PY 2016-2020 CSV Sample File: General Payments	A CSV sample file used to submit general payments for Program Years 2016-2020.

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Resource Name	Description
PY 2016-2020 CSV Sample File: Research Payments	A CSV sample file used to submit research payments for Program Years 2016-2020.
PY 2016 and Onwards CSV Sample File: Physician Owner/Investor	A CSV sample file used to submit ownership/investment interests for Program Years 2016 and onwards.

Quick Reference Guides and Tutorials

Resource Name	Description
Quick Reference Guide: Bulk File Upload	Instructions for submitting data via a bulk file upload.
Quick Reference Guide: Manual Data Entry	Instructions for submitting data via manual data entry.
Quick Reference Guide: Consolidated Reporting	Instructions for submitting data from several related entities through a single entity.
Tutorial: OP AM/GPO Registration and Submission	An overview of Open Payments registration, data submission, and attestation process for reporting entities.

Detailed Supporting Documents

Resource Name	Description
PY 2016-2020 Submission Data Mapping Document	Program Years 2016-2020 data collection and submission spreadsheet that maps each data element to the corresponding CSV field names.
Change Summary: PY 2016-2020 Submission Data Mapping Document	Describes the changes made to Program Years 2016-2020 Submission Data Mapping Document since it was last updated.

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Resource Name	Description
PY 2021 and onwards Submission Data Mapping Document (XLSX)	Program Year 2021 and onwards data collection and submission spreadsheet that maps each data element to the corresponding CSV field names.
Change Summary: PY 2021 and onwards Submission Data Mapping Document (PDF)	Describes the changes made to Program Year 2021 and onwards Submission Data Mapping Document since it was last updated.
Data Dictionary and Methodology Document	A guide to published Open Payments data, including sources of the data, how the data files are presented by CMS, and the fields contained in each data file.
Open Payments User Guide for Reporting Entities Chapter 4: Data Submission and Attestation	Chapter four of the Open Payments User Guide for Reporting Entities contains detailed step-by-step instructions, including screenshots, for submitting data via bulk file upload and manual entry

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Information for Creating Submission Records

Resource Name	Description
Validated Physician List	A non-comprehensive list of U.S. physicians for reference when creating payment records for submission. Includes physicians who have a National Provider Identifier (NPI) number and have been successfully matched by the Open Payments system to at least one payment record from Program Years 2013 through present whether the payment record was published or not. The Validated Physician List (VPL) provides the names, NPIs, and state license information for each physician listed. There is an additional Validated Physician Supplemental List Without NPI that identifies physicians who do not have an NPI and have been reported on in the Open Payments system. Both the VPL and the Validated Physician Supplemental Lists are provided for reference only. If a physician does not appear on either list, it does not mean he/she is not reportable. Physicians that aren't on the VPL may still be successfully matched; users may consult the National Plan and Provider Enumeration System (NPPES) or other data sources for information on reportable physicians not listed on the VPL. The VPL and supplemental files are downloadable CSV files that are **only accessible** within the Open Payments system on the "Submissions" page.
Non-Physician Practitioner List	A non-comprehensive list of U.S. Non-Physician Practitioners, including Physician Assistants (PA), Nurse Practitioners (NP), Clinical Nurse Specialists (CNS), Certified Registered Nurse Anesthetists (CRNA), Anesthesiologist Assistants (AA) and Certified Nurse-Midwives (CNM). The Non-Physician Practitioner List (NPPL) provides the names, NPIs, and state license information for each Non-Physician Practitioner listed. The NPPL is provided for reference only. If a NPP does not appear on this list, it does not mean he/she is not reportable. Users may consult the NPPES or other data sources for information on reportable NPPs not listed on the NPPL. The NPPL is a downloadable CSV file that is **only accessible** within the Open Payments system on the "Submissions" page.
Teaching Hospital Lists by Reporting Cycle	Annually updated lists of teaching hospital covered recipients by reporting cycle. Payments made to hospitals on these lists must be reported to CMS for the purposes of Open Payments. The teaching hospital lists per reporting cycle are available on the "Resources" page of the CMS Open Payments website.

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Resource Name	Description
List of Drug Names and National Drug Codes (NDC)	A non-comprehensive list of drug names and national drug codes when reporting payments in the Open Payments system. A CSV reference file and a PDF instruction document are zipped together and made accessible within the Open Payments system under the "Resources" tab.
List of Medical Device and Medical Supply Name and Primary Device Identifier	A non-comprehensive reference list of medical device, medical supply name, and primary device identifier information. A CSV reference file and a PDF instruction document are zipped together and made accessible within the Open Payments system under the "Resources" tab.

Final Submission & Attestation Resources

Resource Name	Description
Quick Reference Guide: Final Submission and Attestation	Instructions for completing final submission and attestation located on the "Resources" page of the CMS Open Payments website.
Error and Warning Code Key	A list of all error and warning codes generated by the Open Payments system during record validation and matching processes. This resource also provides guidance on how to correct the errors and warnings and is located on the "Resources" page of the CMS Open Payments website.

Next Steps

- Review data submission materials and resources

- Complete data submission activities for your reporting entity

Additional Resources

Additional resources can be found on the Resources page of the CMS Open Payments website at https://www.cms.gov/OpenPayments/Resources.

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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 on how to submit records of payments, other transfers of value, and ownership or investment interests via a bulk file upload.

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- **Replacement / Revision Status:** Revision to previous versions

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- **Summary of Document:** Instructions for submitting data via a bulk file upload

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  - **Rule citation:** 42 C.F.R. §403.900-14

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