An Overview for Teaching Hospitals

Open Payments is a national disclosure program that promotes a transparent and accountable health care system by making the financial relationships between drug and medical device companies (reporting entities) and health care providers (covered recipients) available to the public. Through the Open Payments data, health care consumers have insight into the provider-industry relationship.

Open Payments does not identify which financial relationships are beneficial or which may cause conflicts of interest. The data is open to individual interpretation.
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 (GPOs).

COVERED RECIPIENTS

• Health care providers receiving payments or other transfers of value from the reporting entities.

• The term “covered recipients” specifically includes:
  • Teaching Hospitals
  • Physicians
  • Physician Assistants
  • Nurse Practitioners
  • Clinical Nurse Specialists
  • Certified Registered Nurse Anesthetists and Anesthesiologist Assistants
  • Certified Nurse Midwives
2021 Program Expansion

In 2021, Open Payments expanded to include five new provider types in response to the SUPPORT Act.† They are:

- Physician Assistants
- Nurse Practitioners
- Clinical Nurse Specialists
- Certified Registered Nurse Anesthetists and Anesthesiologist Assistants
- Certified Nurse Midwives

Health care providers who practice either in collaboration with or under the supervision of a physician, including physician assistants, nurse practitioners, and clinical nurse specialists, are referred to as non-physician practitioners (NPPs).

The SUPPORT Act also allows CMS to publish National Provider Identifiers (NPIs) within the Open Payments data.

†Learn more about the SUPPORT Act at cms.gov/OpenPayments/Law-and-Policy
Types of Information Reported

- **ENTERTAINMENT**
  Food, Beverages, Gifts

- **FEES**
  Consulting, Speaking, Honoraria, Teaching, Licenses

- **TRAVEL/ LODGING**

- **OWNERSHIP AND INVESTMENT INTEREST\(^1\)**

- **CHARITABLE CONTRIBUTIONS**

- **ROYALTIES**

- **RESEARCH ACTIVITIES**

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List is not all inclusive.
\(^1\) Only applies to physicians.

**WATCH THE VIDEO**

Review the video for more information about data in the Open Payments system.
The Data: All Active Program Years 2015 – 2021

- **Total U.S. Dollar Value**: $63.20 Billion
- **Total Records Published**: 78.80 Million
- **General Payments**
  - Amount: $20.07 Billion
  - Payments: 73.40 Million
- **Research Payments**
  - Amount: $41.86 Billion
  - Payments: 5.40 Million
- **Value of Ownership**
  - Amount: $1.26 Billion
  - Payments: 3,129
- **Total companies making payments**: 2,783
- **Total physicians receiving payments**: 1.09 Million
- **Total non-physician practitioners (NPPs)**: 233,368
- **Total teaching hospitals receiving payments**: 1,387

Reflects data from January 2023 Data Refresh, see more at [https://openpaymentsdata.cms.gov/summary](https://openpaymentsdata.cms.gov/summary)
Annual Cycle

COLLECT DATA
January 1 – December 31
Reporting entities

SUBMIT DATA
(collected previous year)
February 1 – March 31
Reporting entities

PUBLISH DATA
By June 30
CMS

REVIEW & CORRECT DATA
April 1 – May 30
Reporting entities

REVIEW & DISPUTE DATA
April 1 – May 15
Covered recipients
Program Year 2023 data will be collected between January 1, 2023 and December 31, 2023. The 2023 data will be published in June 2024.

- **COLLECT DATA**
  - January 1 – December 31, 2023
    Reporting entities track payments to providers and teaching hospitals.

- **SUBMIT DATA**
  - February 1 – March 31, 2024
    Reporting entities report Program Year 2023 data to CMS.

- **REVIEW & DISPUTE DATA**
  - April 1 – May 15, 2024
    Covered recipients may review attributed data to ensure accuracy before publication.

- **REVIEW & CORRECT DATA**
  - April 1 – May 30, 2024
    Reporting entities correct data and resolve disputes.

- **PUBLISH DATA**
  - By June 30, 2024
    CMS releases Program Year 2023 data on openpaymentsdata.cms.gov.
Best Practice: Review Your Data

Make sure the information about your hospital in Open Payments is accurate before it becomes public.

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CMS.GOV/OPENPAYMENTS
Affirming Data

Each year, covered recipients have a 45-day pre-publication review and dispute period to help ensure their data is accurate before CMS publishes it.

You have the ability to review data attributed to your hospital, affirm that the data is accurate, and if needed, dispute attributed data that you believe to be incomplete or inaccurate in any way.

Although the review and dispute process is voluntary, CMS strongly encourages covered recipients to review and affirm their data—and if necessary, dispute it—before it becomes public.

PRE-PUBLICATION DATA REVIEW
April 1 – May 15
Registration

Registration requires a two-part personal and professional identity check and verification to ensure the security, privacy, and integrity of your data. Registration and participation in Open Payments is voluntary, but encouraged to ensure data accuracy.

**STEP 1**
Create a user account in the CMS Identity Management System (IDM) at portal.cms.gov. IDM accounts are locked after 60 days of inactivity. Unlock at portal.cms.gov.

- Create a profile and register in the Open Payments system.
- Register using hospital information exactly as it appears on the Open Payments Teaching Hospital list.
- Up to 10 authorized representatives and officials can be authorized to act on the hospital’s behalf in the system.

**STEP 2**

WATCH THE VIDEO
Review the Open Payments registration demo for Teaching Hospitals.

Stay Connected

VISIT THE WEBSITE
- Get FAQs, program details, and resources
- Go to cms.gov/openpayments

JOIN OUR LISTSERV
- Receive program updates
- Subscribe on the “Contact Us” page

SEARCH THE DATA
- Access the data
- Visit openpaymentsdata.cms.gov

HAVE QUESTIONS OR NEED HELP?
Email: openpayments@cms.hhs.gov
The Open Payments Help Desk is open from 9am to 5pm (ET).