



Instructions for Accessing CMS Physician Open Payments (Sunshine Act) Data



On June 1, 2014, the Centers for Medicare & Medicaid Services (CMS) launched the [Open Payments](#) (also known as the Sunshine Act) process for physicians to register and review their industry reported data, which will be made public on Sept. 30, 2014. Congress passed the Sunshine Act as part of the [Patient Protection and Affordable Care Act](#) (ACA). The goal of Open Payments is to create “greater transparency around the financial relationships of manufacturers, physicians and teaching hospitals.” Each year, [manufacturers](#) of drugs, devices, biologicals, and medical supplies must report payments or other transfers of value they make to physicians and teaching hospitals.

Registration, although voluntary, is required for physicians to review and correct their data and must be completed by Aug. 27, 2014. Data released on Sept. 30, 2014 is for payments from August through December 2013. In 2015, and each year thereafter, data will be published on June 30, and will include information from the previous calendar year. Instructions for the two-step registration process are below.

*** WARNING ***

Please note that this is a multi-step process. CMS claims it will take 30 minutes to complete, but it will likely take much longer than this to complete the entire process.

BEFORE YOU START: Have your National Provider Identifier (NPI) number, and Social Security Number (if you choose to enter it, use is optional), medical license number(s), Drug Enforcement Agency (DEA) number, and your neurosurgery provider taxonomy code (which is 207T00000X) all at your fingertips. You may also want to review the [Open Payments Enterprise Portal Registration](#) slide deck and the [Open Payments User Guide](#) before you start the registration process. Additionally, you may contact the Open Payment Help Desk at 1-855-326-8366. We have been told that in some instances it may take some time to get through to the Help Desk.

CMS recommends using only Internet Explorer version 8 or later to register for the Open Payments system. CMS also cautions users against using their browser’s navigation buttons, which can delete registration data. Note that the system “times out” after 15 minutes of inactivity, does not have an auto-save feature, and registration must be completed in one session. Neurosurgeons who have recently registered in the Open Payments system have indicated that they were able to complete the process, but did experience some disruptions requiring them to reenter information.

Phase One: Complete CMS e-verification process

On June 1, 2014, CMS opened the Enterprise Portal to allow physicians to complete the e-verification process and obtain an Enterprise Identification Management (EIDM) ID number. Physicians must complete this process first before they can register to see their data. In future years, this step should not have to be repeated.

1. Once you are ready to begin, go to the [Enterprise Portal](#) and select “New User Registration.”
2. Accept the terms and conditions, being sure to read the “Consent to monitoring” and “Collection of personal identifiable information” sections. Identity verification is required for all users requesting access to any CMS application.
3. Enter your personal information. Note that several fields, including Social Security Number, are optional, but the verification process is quicker if all fields are complete.

Take care to enter your legal name, current home address, primary phone number, and email address correctly. CMS has contracted with Experian to verify your identity.

4. Select your user ID, password and security questions.
5. Complete registration and wait for your confirmation email.

Verification of Identity

Once you get your e-mail EIDM User ID and Password confirmation, you must again log-in to the Enterprise Portal to verify your data. To do this, follow these steps:

1. On the CMS [Enterprise Portal](#), select “Login to CMS Secure Portal”
2. Accept Terms & Conditions
3. Enter EIDM User ID and Password
4. Select “Request Access Now” under “Request Application Access”
5. Select “Request New Application Access”
6. Select Application (Open Payments) and Role (Physician)
7. Review Identity Verification Information
8. Accept Terms & Conditions
9. Confirm Your Information
10. Verify Identity Through a List of Question Such as Previous Addresses, Employers, Phone Numbers, etc.

Once you see the screen confirming that “You have successfully completed the Remote Identity Proofing process,” you may proceed to Phase Two and register in the Open Payments system to review your data. You must first log-out and then log back in to move on to the next phase.

Phase Two: Register with CMS' Open Payments system

Remember, in order to access your data before the public release on Sept. 30, 2014, you must register by Aug. 27, 2014.

To register and review your data follow these steps:

1. Log in to the CMS [Enterprise Portal](#).
2. On the “Welcome” page, click on the “Create My Profile” button.
3. On the “Create Profile” page, scroll to the bottom of the page and click on the “Start Profile” button.
4. On the “Select Profile Type” page, select the “Physician” radio button and click on the “Continue” button to begin the registration process.
5. Follow the on-screen instructions to complete your registration. Note the following items:
 - a. The NPI and DEA numbers are key information used in the vetting process. As a result, while the system does not require these fields to be entered since not all physicians have these identifiers, **the NPI and DEA numbers should be entered if you have them.**
 - b. You are required to enter at least one physician license number; however, to ensure that you are able to see all records that are attributable to you, you should enter all of your medical license numbers if you have multiple. **Note: If you do not enter all of your license numbers, you may not be able to view all of your records.**

- c. You may choose to add an authorized representative to take certain actions on your behalf in the Open Payments system. This person can be another physician, an office manager, a practice manager, or another person you would like to designate. You may designate this person during your registration process by selecting the “Designate an authorized representative” radio button on the “Physician: Authorized Representative” page. In addition to identifying the individual’s personal information, you will also designate the levels of access that you would like to grant the authorized representative. Refer to the onscreen text or the [User Guide](#) for the available access roles that can be assigned. If you do not wish to identify an authorized representative during registration, you may select “Not now”, and add this information at a later time via the Update Profile function.
6. Once you have entered all of your information per the on-screen instructions, and selected the “Submit” button on the “Review and Submit Profile” page, your profile will automatically be submitted for vetting. The vetting process is performed to ensure that the physician is a valid covered recipient and to aid in the matching of submitted records to the corresponding physicians.

Note: Physician registration is not considered complete until the vetting process has been successfully completed. As a result, you will not be able to access some of the Open Payments system functions, including the Review and Dispute functions, until the vetting is successful. You can check your profile status by going to “My Profile” and reviewing the “Role Status” field. After you have logged-in, select the Open Payments tab. Then select “Create my profile” to begin the registration process.

Phase 3: Review and dispute data by Aug. 27

Once registered, physicians can request their individual report, review it and flag any disputes. CMS has indicated that it will not resolve disputes, but errors can be reported to manufacturers through the Open Payments System or directly through Open Payments contacts listed on most manufacturer websites. Physicians must initiate disputes by Aug. 27 to have potentially erroneous data flagged in the initial public release. Physicians can still initiate disputes on 2013 data until Dec. 31, 2014, but it will not be flagged in the public database until 2015.

While some neurosurgeons have found their data to be accurate, others have discovered incorrect payments attributed to them, including costs associated with food and beverage for events that they did not attend. In these instances, neurosurgeons have contacted the pertinent manufacturers to request that the information be corrected.

More information is available on the CMS website at: <http://go.cms.gov/1pLgHyV> or by contacting the Open Payment Help Desk at 1-855-326-8366.

Neurosurgeons with questions may also contact:

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