

Open Payments System Quick Reference Guide

Self-Nominations and Accepting/Rejecting Nominations for Applicable Manufacturers and Applicable GPOs

Introduction

This quick reference guide provides instructions on how to nominate yourself for a user role with an applicable manufacturer or applicable group purchasing organization (GPO)(hereafter collectively referred to as a “reporting entity”) in the Open Payments system and how to accept or reject a user role you have been nominated for by another Open Payments system user.

Prerequisites

- Users are registered in the Centers for Medicare & Medicaid Services (CMS) Identity Management (IDM) system and obtained access to the Open Payments system.
- Reporting entity is registered in the Open Payments system.

User Roles

There are four user roles for reporting entities: officer, submitter, attester, and compliance. You may hold more than one role.

1. **Officer:** Manages the reporting entity in the Open Payments system and all user roles associated with the reporting entity, such as approving user role nominations and is permitted to view and download the compliance communications associated with the reporting entity. An Officer who registered with the **Reporting Entity Officer or Teaching Hospital Authorized Official role** can register a NEW reporting entity profile (applicable manufacturer or applicable group purchasing organization not already registered in the Open Payments system).
2. **Submitter:** Submits data on payments, other transfers of value, and ownership and investment interests for the reporting entity. Submitters also receive notifications of disputes initiated against the reporting entity’s submitted data by physicians, non-physician practitioners (NPPs) and teaching hospitals.
3. **Attester:** Attests to the accuracy of the data that has been submitted by the reporting entity.
4. **Compliance:** Upon receipt of the compliance communications email notification for the reporting entity, those holding the compliance user role can view the compliance communication details within Open Payments system.

Actions

Nominating Yourself for a Role (Self-Nomination)

The reporting entity must be registered in the Open Payments system in order for you to nominate yourself for a user role. If the entity has not yet been registered in the Open Payments system, you may create a profile for it and select user roles for yourself during profile creation, one of which must be the officer role. Refer to the quick reference guide “Applicable Manufacturer and Applicable GPO Profile Creation and Recertification” for instructions.

If the entity is registered in Open Payments but no longer has a user in the system who holds the officer user role to approve your nomination, you can contact the Open Payments Help Desk at openpayments@cms.hhs.gov to nominate yourself as an officer. If the entity does not have an officer and you want to nominate yourself for a non-officer role, your nomination will not be approved until the reporting entity has an active officer. The proposed officer must complete the self-nomination process first and then call the Open Payments Help Desk to begin the role approval process.

If the entity has at least one officer, follow the steps below.

1. Log in to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov>.
 - a) If you have not yet registered in the Open Payments system, select “Create My Profile.” Select “Start Profile” at the bottom of the screen, then select the profile type “Applicable Manufacturer or Applicable GPO” and select “Continue.”
 - b) If you have already registered in the Open Payments system, select the “My Profile” tab from the home page menu bar. Select the “My Roles and Nominations” tab, then select “Request a Role.”
2. On the Entity Lookup screen, enter the Taxpayer Identification Number (TIN)/Employer Identification Number (EIN) of the reporting entity you want to associate yourself with, then select “Find.” The format for the TIN/EIN is XX-XXXXXXX. If the correct reporting entity from the list is displayed, select the entity and then select “Continue.”
 - a) If no reporting entity is found and you have confirmed that the TIN/EIN you entered is correct, check if the reporting entity is registered. If it is not registered, the entity must be registered by an Officer before you can associate yourself with it. Refer to the quick reference guide “Applicable Manufacturer and Applicable GPO Profile Creation and Recertification” for instructions on registering the entity.
3. If you selected “Continue,” you will review the reporting entity information displayed on the screen. If the entity information displayed is correct, select “Continue” to proceed.
 - a) If this information is not correct, you may still proceed with creating an entity profile. After you complete the profile, contact an individual who holds the Open Payments user role of officer for the reporting entity to notify them of the inaccurate information. Officers may edit the entity’s profile.

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4. On the next screen, enter your personal and business contact information. Also select the role or roles for which you want to nominate yourself. Select “Continue.”
5. On the “Review and Submit Profile” screen, review the information entered in your profile. Select “Back” to go back and edit any incorrect information. When the information is correct, select “Continue” to submit your request.

After you complete the self-nomination request, all officers affiliated with the reporting entity will receive an email notification to approve your self-nomination request. You cannot take any role-related actions until your self-nomination has been approved by an officer. You will receive an email once your nomination is approved.

Accepting or Rejecting a User Role Nomination

If you are nominated for a role in the Open Payments system by another individual, you will receive a notification email. You will have 10 calendar days to accept or reject the nomination. If you have not taken action on your nomination within 10 days, the nomination will expire, and you will have to have a user associated with the reporting entity nominate you again or nominate yourself for a user role.

To accept or reject a nomination, follow the steps below.

1. Log in to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov>.
 - a) If you have not yet registered in the Open Payments system, select “Create My Profile.” Then select “Start Profile” at the bottom of the screen. Select the “I have a Nomination ID and Registration ID” link on the “Select Profile Type” page.
 - b) If you have a profile in the Open Payments system, select the “My Profile” tab from the home page menu bar. Select the “My Roles and Nominations” tab, then select “Accept a Role.”
2. Enter the Registration ID and Nomination ID that you received in the nomination notification email and then select “Show Nomination.”
3. Review the nomination information displayed. If the information is correct, select “Continue”. If it is not correct, select “Cancel” to cancel the nomination process, and contact an individual who holds the user role of officer with the reporting entity for assistance.
4. If you selected “Continue,” you will review the reporting entity information displayed on the screen. If the entity information displayed is correct, select “Continue” to proceed.
 - a) If this information is not correct, you may still proceed with profile creation. After you complete your profile, contact an individual who holds the user role of officer for the reporting entity in the Open Payments system to notify them of the inaccurate information. Officers may edit the entity’s profile.
5. Select “Yes, I accept” for the role or roles you accept and “No, I do not accept” for the role or roles you do not accept.

- a) If you selected “Yes, I accept,” to one or more user roles, enter your personal information and select “Continue.” Confirm the information you entered and select “Continue” on the “Review and Submit Profile” screen to complete your profile and user role acceptance.
- b) If you select “No, I do not accept” for all user roles, the process ends, and you will not have access to the reporting entity.

Next Steps

- If you hold the officer role, you can nominate others for user roles, accept or reject self-nominations, view compliance communications associated with the reporting entity, and manage the entity’s profile in the system.
- If you hold the submitter user role, you can begin submitting payment records to the system and address disputes initiated against records by physicians, NPPs and teaching hospitals.
- If you hold the attester user role, you can begin attesting to the accuracy of submitted payment records in the system.
- If you hold the compliance user role, you can begin viewing and downloading the compliance communications sent by the CMS Compliance Team to the reporting entity.

Additional Resources

Supporting resources are available on the Resources page of the Open Payments website at <https://www.cms.gov/priorities/key-initiatives/open-payments/resources>.

The “Applicable Manufacturer and Applicable GPO Registration” section of the Open Payments User Guide for Reporting Entities covers the registration processes in detail and provides step-by-step instructions for various scenarios.

Quick reference guides relevant to user roles and self-nominations include:

- Applicable Manufacturer and Applicable GPO Profile Creation and Recertification
- Reporting Entities: User Roles, Nominations, Approving/Modifying Nominations, and
- Deactivating Users

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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