

Review and Dispute For Physicians and Teaching Hospitals

Chapter 9: Review and Dispute for Physicians and Teaching Hospitals

This chapter provides information on the process for physicians and teaching hospitals in the Open Payments system to view records submitted regarding payments and other transfers of value, as well as ownership and investment interests, submitted about them from applicable manufacturers and applicable GPOs.

This chapter is divided into the following sections:

- **Overview of Review and Dispute**, which provides information on the review and dispute process within the Open Payments system.
- **Reviewing and Affirming Payments and Other Transfers of Value**, which provides information on how physicians and teaching hospitals can review and affirm data submitted about them by applicable manufacturers and applicable GPOs.
- **Initiating and Withdrawing Disputes**, which provides information on how physicians and teaching hospitals can initiate or withdraw a dispute of submitted data.

All physicians and teaching hospitals who choose to view data reported about them must register in both EIDM and Open Payments prior to accessing the system. See Chapter 8 for registration information.

Once an applicable manufacturer or applicable GPO has reported a payment or other transfer of value about a physician or teaching hospital, or physician ownership or investment interest, the physician or teaching hospital will be able to review the payment or transfer of value information and affirm or dispute the submitted data prior to it being made public. This process is referred to as “Review and Dispute.” Any user who has permission to dispute records may initiate a dispute on any record they have access to.

The review and dispute period will start at least 60 days before the information is to be published for that program year. Physicians and teaching hospitals will work directly with reporting entities to resolve disputes outside of the Open Payments system.

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If a dispute is not resolved before the end of the 60-day period, the latest, attested-to data submitted by the applicable manufacturer or applicable GPO will be published in the next data publication and identified as being under dispute.

Reviews and disputes can occur outside of this 60-day period; the review and dispute process is open year-round. If the applicable manufacturer or applicable GPO cannot resolve the dispute with the physician or teaching hospital within those 60 days, all parties should continue to seek a resolution. The process is outlined in Figure 9.1 below.

Figure 9.1: Review, Dispute, and Correction Process

During	What Happens During Review?	What Happens During Dispute?	What Happens During Corrections?
Day 1-45	<ul style="list-style-type: none"> Applicable manufacturers, applicable GPOs, physicians and teaching hospitals review their data before it is made public. 	<ul style="list-style-type: none"> Physicians and teaching hospitals can dispute information reported about them or their institutions. Disputes initiated during this 45-day period that are not resolved by the end of the period will be reflected in the public data as the record will be shown as under dispute. CMS will not mediate any dispute. 	<ul style="list-style-type: none"> Applicable manufacturers and applicable GPOs should work with the disputing physician or teaching hospital to correct disputed data. Applicable manufacturers or applicable GPOs must submit a revised report to make the corrections and re-attest to the updated data.
> 45 Days	<ul style="list-style-type: none"> Applicable manufacturers and applicable GPOs seek to resolve disputes received from physicians and teaching hospitals. Physicians and teaching hospitals may continue to review the data. 	<ul style="list-style-type: none"> Physicians and teaching hospitals may continue to initiate disputes during this period but resolutions may not be reflected in publicly displayed data. 	<ul style="list-style-type: none"> Applicable manufacturers and applicable GPOs should work with physicians and teaching hospitals to make corrections. Corrections made to disputes may not be included in the next publication of data. Applicable manufacturers and applicable GPOs must send CMS a revised report to make the appropriate corrections and re-attest to the updated data.

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There is an initial 45-day period for physicians and teaching hospitals to review and dispute data submitted about them by reporting entities, and work with reporting entities to resolve the disputes. Immediately following that initial 45 days is an additional 15-day correction period for reporting entities to continue to work with physicians and teaching hospitals on dispute resolution.

Disputes initiated or resolved after the 60-day period will not be published in the initial publication of data. Those disputes and any related data changes will be published in the next publication of data, either in a refresh publication of the program year data or the publication of the next program year's data. In the publication, the data will be associated with the program year of the data, not the date of its publication. Disputes initiated within the initial 45-day review and dispute period, and resolved by the end of the additional 15-day correction period, will be published and identified as non-disputed in the initial public posting of data. Disputes initiated during the 15-day dispute correction period will not be in the initial public posting of data.

Figure 9.2 below explains how the dispute initiation and resolution timing affects the public display status of the data:

Figure 9.2: Dispute Initiation, Resolution, and Public Display of Program Year 2013 Data

Timing of Dispute Initiation	Dispute Resolution Status Within 45-Day Initial Period or 15-Day Correction Period	Public Display Status
Within 45-day review, dispute & correction period	Resolved	Data, with any revisions from resolution, will be published as non-disputed in September 2014.
	Not resolved	Data published as disputed in September 2014.
After 45-day review, dispute & correction period and prior to the review, dispute & correction period before the next data refresh or publication	Resolved	Data published as non-disputed in both September 2014 and the subsequent data publication related to the 2013 program year data. Any revisions to data due to resolution will appear in subsequent data publications
	Not resolved	Data published as non-disputed in September 2014 and as disputed in the subsequent data publication related to 2013 program year.

** The exact date may vary. Note that the rule does not require CMS to display the data as disputed if not resolved during this period.

Records that have been disputed will have one of the following dispute statuses:

- **Initiated:** indicates that a physician or teaching hospital has initiated a dispute against a record submitted by an applicable manufacturer or applicable GPO.
- **Acknowledged:** indicates that an applicable manufacturer or applicable GPO has received and acknowledged a dispute initiated against them by a physician or teaching hospital. Acknowledging a dispute will trigger a notification to the initiating physician or teaching hospital letting them know their dispute has been received.
- **Resolved, No Change:** indicates that either the applicable manufacturer or applicable GPO does not agree with a dispute initiated by a physician or teaching hospital or the applicable manufacturer or applicable GPO has discussed the dispute with the initiating physician or teaching hospital and it was determined that no change in the data was necessary. The physician or teaching hospital who initiated the dispute can initiate a new dispute if they disagree with “resolved, no change” status.
- **Withdrawn:** indicates that a physician or teaching hospital has withdrawn a dispute they initiated against a record submitted by an applicable manufacturer or applicable GPO.
- **Resolved:** indicates that disputed data was updated and then resubmitted and re-attested to by the applicable manufacturer or applicable GPO.

Emails transmitted to applicable manufacturers, applicable GPOs, physicians, and teaching hospitals from the Open Payments system for review and dispute will not contain contact information. For example, an email notifying a reporting entity of a dispute from a physician will contain only the information needed to locate the record in the Open Payments system. You can view a sample notification email for each review and dispute action in Appendix D. Contact information can be obtained only by opening the record within the Open Payments system itself.

Section 9.1: Reviewing and Affirming Submitted Data

Physicians and teaching hospitals that have registered with the Open Payments system may review all payment, other transfer of value, and physician ownership or investment interest data submitted by an applicable manufacturer or applicable GPO about them. When the data has been reviewed and the physician or teaching hospital does not find discrepancies in the data submitted, they may choose to affirm that the record(s) are in good standing.

Records that have not been affirmed will still be included in the next data publication. Note that if you determine that a record you previously affirmed is in error, you can initiate a dispute on that record. The process for reviewing and affirming disputes is illustrated in Figure 9.3 below. Step-by-step walkthroughs of various scenarios follow.

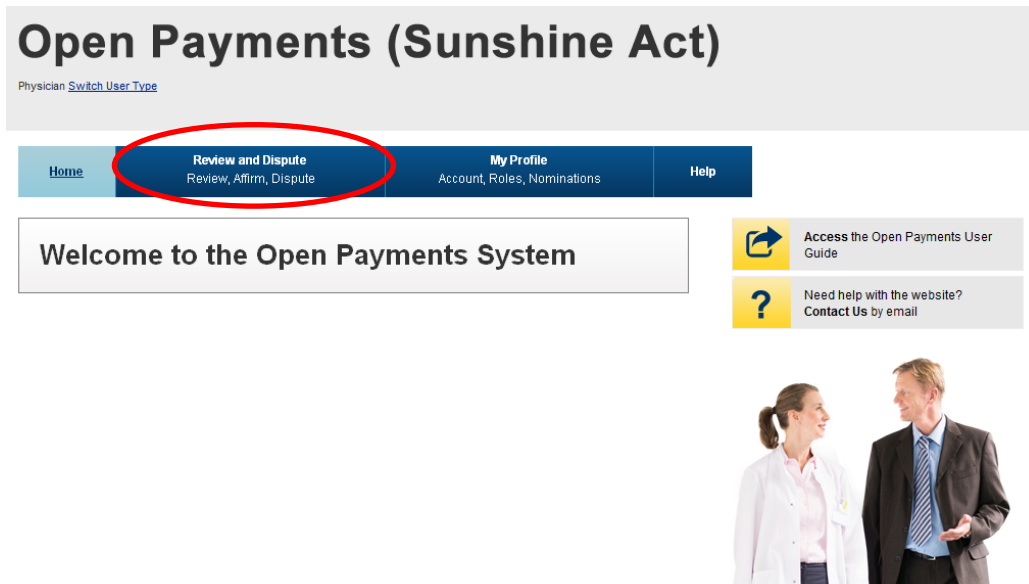
Figure 9.3: Review and Affirmation Process



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Section 9.1b: Physician – Reviewing and Affirming Submitted Data

Step 1: Access the Open Payments system via the CMS Enterprise Portal (<https://portal.cms.gov/>) and select the “Review and Dispute” tab.



Step 2: Select the physician and the appropriate program year for the physician you wish to review for data submitted by applicable manufacturers and applicable GPOs. Select “Show Records.”

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Review and Dispute Overview

A field with an asterisk (*) is required.

Physician Records

Select the reporting entity and program year for which records relating to payments or other transfers of value, or ownership or investment interests are disputed. Then select “Show Disputes.”

There is an initial 45-day period for physicians and teaching hospitals to review and dispute their data before it is made public. Following that initial 45 days is an additional 15-day correction period for reporting entities to work with physicians and teaching hospitals to resolve disputes.

Physicians and teaching hospitals may initiate disputes with reporting entities at any time, not just during the above-mentioned periods. Note the information below to understand how the dispute initiation and resolution timing affects public display of the data.

- Disputes initiated within the initial 45-day review and dispute period, and resolved by the end of the additional 15-day correction period, will be published and tagged as non-disputed in the September 2014 publication of the data.
- Disputes initiated within the initial 45-day review and dispute period, and NOT resolved by the end of the additional 15-day correction period, will be published and tagged as disputed in the September 2014 publication of the data.
- Disputes initiated after the 45-day review and dispute period, and resolved by the beginning of the following review period, will be published and tagged as non-disputed in both the September 2014 data publication and subsequent data publications (however, the values of the published data will be different for each of these publications, per the dispute resolution).
- Disputes initiated after the 45-day review and dispute period, and NOT resolved by the beginning of the following review period, will be published and tagged as non-disputed in the current display status (September 2014) and tagged as disputed in the upcoming data release display status.

Only records for which initial attestation was completed before the start of the review and dispute period will be considered for publication in the September 2014 publication of data.

For a complete list of detailed rules around data publication, refer to the [Open Payments User Guide](#).

* Choose a Physician:

John Doe

* Program Year:

2013

Show Records



Access the Open Payments User Guide



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Step 3: On the records page, you will see a list of all submitted records for the selected physician. You may filter the records by selecting “Entity Making Payment” from the appropriate drop-down menu. You may further filter information by including the Record ID, Date of Publication and/or Dispute ID. You do not need to filter the results in order to proceed. Scroll to the right and select “View” under the column title “View Record” to view the record details. Please note that this information is only available on the Open Payments system, and cannot be downloaded.

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The table below contains only the records reported for the selected physician during the selected program year.

The list is organized by reporting entity, including reporting entities that reported made payments or other transfers of value to the physician, and reporting entities in which the physician has ownership or investment interests.

Only records that have been attested to by reporting entities will be displayed. Records that have not yet been attested to or are still being processed by a reporting entity will be made available for review only after attestation has been completed.

Please note: There is a horizontal scroll bar below the table, for you to use to view more columns in the table. Use the filtering tools below to customize your view of the disputed records.

To take an action related to a disputed record, select the check box in the first column of the table (next to the Entity Making Payment column). You may then perform the following actions on the selected record(s):

- Select “Affirm Record” to confirm the payment or other transfer of value, or ownership or investment interest.
- Select “Dispute Record” to dispute the payment or other transfer of value, or ownership or investment interest. You will need to provide a reasonable explanation for your dispute of the record.
- Select “Withdraw Dispute” to acknowledge that the physician is no longer disputing the record.

To return to the previous page, select “Back.”

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

Physician Records

Entity Making Payment:

Please Select

Record ID:

Date Of Publication:

Please Select

Dispute ID:

Review and Dispute Status:

Initiated
Acknowledged
Resolved No Change
Withdrawn
Resolved

Payment Category:

☐ General Payments
☐ Research Payments
☐ Ownership or Investment Interest

Affirmed (Yes/No):

☐ Yes
☐ No

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Show Entries

[Affirm Record](#)

[Dispute Record](#)

[Withdraw Dispute](#)

Select	Entity Making Payment	Record ID	Dispute ID	Payment Category	Form Of Payment or Transfer of Value	Nature Of Payment or Transfer of Value	Date of Payment	Amount(\$)	Delay in Publication of Research Payment Indicator	Last Modified Date	Current Record Standing
<input checked="" type="checkbox"/>	ABCDE Medical	10054		General Payments	Cash or cash equivalent	Consulting Fee	2013-11-04	\$5,000.00	No	2014-07-02	Attested
<input type="checkbox"/>	ABCDE Medical	10056		General Payments	Cash or cash equivalent	Grant	2013-10-21	\$7,500.00	No	2014-07-02	Attested
<input type="checkbox"/>	ABCDE Medical	10055		General Payments	Cash or cash equivalent	Education	2013-12-11	\$1,500.00	No	2014-07-02	Attested

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Step 4: Review the information of the submitted record. When finished, select “Back” to return to the Records page.

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Record ID: 10054

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Program Year: 2013	Last Modified Date: 2014-06-16
Entity: ABCDE Medical	Last Modified By:
Payment Category: General Payments	Submission Date: 2014-06-11
Consolidated Reporting: No	Submitted By: John Doe
	Record Status: Attested
	Override Status:
	Associated Disputes and Statuses:
	947 Withdrawn
	987 Acknowledged
	1045 Dismissed

Recipient Demographic Information

Covered Recipient Type: Physician

Physician First Name: John

Physician Middle Name:

Physician Last Name: Doe

Physician Name Suffix:

Recipient Business Street Address Line 1: 7500 Security Blvd

Recipient Business Street Address Line 2:

Recipient City: Baltimore

Recipient State: Maryland

Recipient Zip Code: 21244

Recipient Country: UNITED STATES

Recipient Province:

Recipient Postal Code:

Recipient Email Address:

Physician Primary Type: Medical Doctor

Physician NPI: 1518254366

Physician Specialty: 1234567890

Physician License State: VIRGINIA

Physician License Number: VA001

Physician License State:

Physician License Number:

Physician License State:

Physician License Number:

Physician License State:

Physician License Number:

Physician License State:

Physician License Number:

Associated Drug, Device, Biological, or Medical Supply Information

Product Indicator: Combination

Name of Associated Drug or Biological: 1, Prod_22

National Drug Code of Associated Covered Drug or Biological:

Name of Associated Covered Device or Medical Supply: 1, Prod_22, 2, Prod_4, 3, Prod_20, 4, Prod_11, 5, Prod_4

Transfer of Value (Payment) Information

Total Amount of Payment: 5000

Date of Payment: 20131104

Number of Payments Included in Total Amount: 1

Form of Payment or Transfer of Value: Cash or cash equivalent

Nature of Payment or Transfer of Value: Consulting Fee

General Record Information

Physician Ownership Indicator: No

Third Party Payment Recipient Indicator: Individual

Name of Third Party Entity Receiving Payment or Transfer of Value:

Charity Indicator: No

Third Party Equals Covered Recipient Indicator: No

Delay in Publication of Research Payment Indicator:

Confidential Information:

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Step 5: Select the record(s) you wish to affirm. You may only affirm records with a review and dispute status of “[Resolved, No Change](#),” “[Withdrawn](#),” or “[Resolved](#),” or record with no review and dispute status given. When the record(s) has been selected, select “Affirm Record.”

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The table below contains only the records reported for the selected physician during the selected program year.

The list is organized by reporting entity, including reporting entities that reported made payments or other transfers of value to the physician, and reporting entities in which the physician has ownership or investment interests.

Only records that have been attested to by reporting entities will be displayed. Records that have not yet been attested to or are still being processed by a reporting entity will be made available for review only after attestation has been completed.

Please note: There is a horizontal scroll bar below the table, for you to use to view more columns in the table. Use the filtering tools below to customize your view of the disputed records.

To take an action related to a disputed record, select the check box in the first column of the table (next to the Entity Making Payment column). You may then perform the following actions on the selected record(s):

- Select “Affirm Record” to confirm the payment or other transfer of value, or ownership or investment interest.
- Select “Dispute Record” to dispute the payment or other transfer of value, or ownership or investment interest. You will need to provide a reasonable explanation for your dispute of the record.
- Select “Withdraw Dispute” to acknowledge that the physician is no longer disputing the record.

To return to the previous page, select “Back.”

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

Physician Records

Entity Making Payment:

Please Select

Record ID:

Date Of Publication:

Please Select

Dispute ID:

Review and Dispute Status:

Initiated
Acknowledged
Resolved No Change
Withdrawn
Resolved

Payment Category:

☐ General Payments
☐ Research Payments
☐ Ownership or Investment Interest

Affirmed (Yes/No):

☐ Yes
☐ No

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[Dispute Record](#)

[Withdraw Dispute](#)

Select	Entity Making Payment	Record ID	Dispute ID	Payment Category	Form Of Payment or Transfer of Value	Nature Of Payment or Transfer of Value	Date of Payment	Amount(\$)	Delay in Publication of Research Payment Indicator	Last Modified Date	Current Record Standing
<input checked="" type="checkbox"/>	ABCDE Medical	10054		General Payments	Cash or cash equivalent	Consulting Fee	2013-11-04	\$5,000.00	No	2014-07-02	Attested
<input type="checkbox"/>	ABCDE Medical	10056		General Payments	Cash or cash equivalent	Grant	2013-10-21	\$7,500.00	No	2014-07-02	Attested
<input type="checkbox"/>	ABCDE Medical	10055		General Payments	Cash or cash equivalent	Education	2013-12-11	\$1,500.00	No	2014-07-02	Attested

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Step 6: Review the information on the “Affirm Records” page. If the information is correct, select “Affirm Records.” We will discuss disputing records later in the User Guide.

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Select “Affirm Records” to confirm the payments or other transfers of value, or ownership or investment interests reported by the entity are accurate and valid.

To return to the previous page, select “Cancel.”

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

You are affirming the following [1] record(s):

Record ID	Entity Making Payment	Date of Payment	Amount (\$)	Record Status	Review and Dispute Status
10054	ABCDE Medical	2013-11-04	\$5,000.00	Attested	

[Cancel](#)

[Affirm Records](#)

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The following message will be displayed on the screen, confirming the success affirmation of the submitted record. Also, the record's "Affirmed Yes/No" indicator, visible in the view records table, will be set to Y.

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You have successfully affirmed the following record(s):

Record Id
10054

The table below contains only the records reported for the selected physician during the selected program year.

The list is organized by reporting entity, including reporting entities that reported made payments or other transfers of value to the physician, and reporting entities in which the physician has ownership or investment interests.

Only records that have been attested to by reporting entities will be displayed. Records that have not yet been attested to or are still being processed by a reporting entity will be made available for review only after attestation has been completed.

Please note: There is a horizontal scroll bar below the table, for you to use to view more columns in the table. Use the filtering tools below to customize your view of the disputed records.

To take an action related to a disputed record, select the check box in the first column of the table (next to the Entity Making Payment column). You may then perform the following actions on the selected record(s):

- Select "Affirm Record" to confirm the payment or other transfer of value, or ownership or investment interest.
- Select "Dispute Record" to dispute the payment or other transfer of value, or ownership or investment interest. You will need to provide a reasonable explanation for your dispute of the record.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record.

To return to the previous page, select "Back."

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

Physician Records

Entity Making Payment:		Record ID:		Date Of Publication:	
Please Select				Please Select	
Dispute ID:		Review and Dispute Status:		Payment Category:	
		Initiated Acknowledged Resolved No Change Withdrawn Resolved		<input type="checkbox"/> General Payments <input type="checkbox"/> Research Payments <input type="checkbox"/> Ownership or Investment Interest	
				Affirmed (Yes/No): <input type="checkbox"/> Yes <input type="checkbox"/> No	
				Search Clear All	

Showing Results for:[All]

Show Entries 10

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[Withdraw Dispute](#)

Select	Entity Making Payment	Record ID	Dispute ID	Payment Category	Form Of Payment or Transfer of Value	Nature Of Payment or Transfer of Value	Date of Payment	Amount(s)	Delay in Publication of Research Payment Indicator	Last Modified Date	Current Record Standing
<input type="checkbox"/>	ABCDE Medical	10054		General Payments	Cash or cash equivalent	Consulting Fee	2013-11-04	\$5,000.00	No	2014-07-02	Attested
<input type="checkbox"/>	ABCDE Medical	10056		General Payments	Cash or cash equivalent	Grant	2013-10-21	\$7,500.00	No	2014-07-02	Attested
<input type="checkbox"/>	ABCDE Medical	10055		General Payments	Cash or cash equivalent	Education	2013-12-11	\$1,500.00	No	2014-07-02	Attested

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Section 9.2: Initiating and Withdrawing Disputes

Data submitted regarding payments or other transfers of value to physicians or teaching hospitals by applicable manufacturers and applicable GPOs can be disputed by that physician or teaching hospital.

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Section 9.2c: Physician - Initiating a Dispute

Step 1: Access the Open Payments system via the CMS Enterprise Portal (<https://portal.cms.gov/>) and select the “Review and Dispute” tab.



Step 2: Select the physician and the appropriate program year you wish to review for data submitted by applicable manufacturers and applicable GPOs. Select “Show Records.”

The image shows the 'Review and Dispute Overview' page. At the top, the title 'Open Payments (Sunshine Act)' is displayed with a link to 'Physician Switch User Type'. Below this is a navigation bar with four tabs: 'Home', 'Review and Dispute' (which is selected), 'My Profile', and 'Help'. Under the 'Review and Dispute' tab, the subtext 'Review, Affirm, Dispute' is visible. Below the navigation bar, a 'Welcome to the Open Payments System' message is shown. To the right of the welcome message are two buttons: 'Access the Open Payments User Guide' and 'Need help with the website? Contact Us by email'. Below this is a photograph of a male and female doctor in white coats. The main content area is titled 'Review and Dispute Overview' and contains instructions for disputing records. At the bottom of the page, there is a form with two dropdown menus: 'Choose a Physician:' (with 'John Doe' selected) and 'Program Year:' (with '2013' selected). Below these dropdowns is a button labeled 'Show Records', which is circled in red. Two red arrows point to the 'Show Records' button.

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Step 3: On the Records page, you will see a list of all submitted records for the chosen physician. If you wish, you may filter the records by selecting the “Entity Making Payment” from the specified drop-down. You may also filter further by including the Record ID, Date of Publication and/or Dispute ID. You do not need to filter the results in order to proceed. You can also scroll to the right to view more information about the record. Scroll to the right and select “View” under the column title “View Record” to view the record details. Please note that this information is only available on the Open Payments system, and cannot be downloaded.

Select the record(s) you wish to dispute. When the record(s) has been selected, select “Dispute Record.”

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The table below contains only the records reported for the selected physician during the selected program year.

The list is organized by reporting entity, including reporting entities that reported made payments or other transfers of value to the physician, and reporting entities in which the physician has ownership or investment interests.

Only records that have been attested to by reporting entities will be displayed. Records that have not yet been attested to or are still being processed by a reporting entity will be made available for review only after attestation has been completed.

Please note: There is a horizontal scroll bar below the table, for you to use to view more columns in the table. Use the filtering tools below to customize your view of the disputed records.

To take an action related to a disputed record, select the check box in the first column of the table (next to the Entity Making Payment column). You may then perform the following actions on the selected record(s):

- Select “Affirm Record” to confirm the payment or other transfer of value, or ownership or investment interest.
- Select “Dispute Record” to dispute the payment or other transfer of value, or ownership or investment interest. You will need to provide a reasonable explanation for your dispute of the record.
- Select “Withdraw Dispute” to acknowledge that the physician is no longer disputing the record.

To return to the previous page, select “Back.”

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

Physician Records

Entity Making Payment:
Please Select

Record ID:

Date Of Publication:
Please Select

Dispute ID:

Review and Dispute Status:
Initiated
Acknowledged
Resolved No Change
Withdrawn
Resolved

Payment Category:
☐ General Payments
☐ Research Payments
☐ Ownership or Investment Interest

Affirmed (Yes/No):
☐ Yes
☐ No

[Search](#)[Clear All](#)

Showing Results for:[All]

Show Entries

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Select	Entity Making Payment	Record ID	Dispute ID	Payment Category	Form Of Payment or Transfer of Value	Nature Of Payment or Transfer of Value	Date of Payment	Amount(\$)	Delay in Publication of Research Payment Indicator	Last Modified Date	Current Record Standing
<input type="checkbox"/>	ABCDE Medical	10054		General Payments	Cash or cash equivalent	Consulting Fee	2013-11-04	\$5,000.00	No	2014-07-02	Attested
<input checked="" type="checkbox"/>	ABCDE Medical	10056		General Payments	Cash or cash equivalent	Grant	2013-10-21	\$7,500.00	No	2014-07-02	Attested
<input type="checkbox"/>	ABCDE Medical	10055		General Payments	Cash or cash equivalent	Education	2013-12-11	\$1,500.00	No	2014-07-02	Attested

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Step 4: Review the information on the “Dispute Records” page. You must enter a reason for dispute within the text box before continuing. The text box can contain up to 4,000 characters, including spaces. Special characters allowed in the box are limited to apostrophes or single quotes (’), periods (.), ampersands (&), hyphens (-), and commas (,).

Note: As mentioned, you must provide a reason why the records are being disputed in the “Reason for Dispute” text box. If you have different reasons for each of the records being disputed, you may dispute one or more record(s) at a time with a common dispute factor, and enter the relevant reason for dispute. The contents of the “Reason for Dispute” box will be sent in an email to the reporting entity that reported the payment, other transfer of value, or physician ownership or investment interest. If multiple disputes are initiated at the same time across different reporting entities, the same “Reason for Dispute” text will be sent to all of the reporting entities included in the dispute. When finished, select “Send Dispute.”

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Dispute Records

A field with an asterisk (*) is required.

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In the “Reason for Dispute” free-form text box below, provide an explanation for disputing the record (an explanation is required). The text box can contain up to 4,000 characters, including spaces. Special characters allowed in the box are limited to apostrophes or single quotes (’), periods (.), ampersands (&), hyphens (-), and commas (,).

Select “Send Dispute” after entering reasons.

An example of a reason for initiating a dispute that should be noted in the box below: “This record is disputed because an incorrect name of the associated drug or biological name is listed and also the reported payment amount of “thirty thousand dollars” is inaccurate. It should be “three thousand dollars.”

Note: The contents of the “Reason for Dispute” box will be sent in an email to the applicable manufacturer or applicable GPO that reported the payment, other transfer of value, or ownership or investment interest. Even in the case of a record that was submitted as part of a consolidated report, the dispute is sent to the entity that made the payment, as opposed to the entity that submitted the consolidated report to the Open Payments system.

If multiple disputes are initiated at the same time across different applicable manufacturers or applicable GPOs, the same “Reason for Dispute” text will be sent to all of them.

Once the action has been confirmed by selecting “Send Dispute,” the status of the dispute will be displayed as “Initiated.”

To return to the previous page, select “Cancel.”

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

You have selected the following (1) record(s):

Record ID	Entity Making Payment	Date of Payment	Amount (\$)	Record Status	Review and Dispute Status
10056	ABCDE Medical	2013-10-21	\$7,500.00	Attested	

* Reason for Dispute:

The payment amount is incorrect. The amount received was 7,500 and needs to be updated.

4,000 characters maximum

[Cancel](#)[Send Dispute](#)

Open Payments User Guide

The following “Dispute Confirmed” message will be displayed on the screen. An email notification will be sent to the reporting entity.

Open Payments (Sunshine Act)

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Disputes Confirmed

John Doe - 2013

[Continue](#)

You have successfully initiated the following dispute(s).
An email has been sent to notify the reporting entity.
Date Dispute(s) Initiated: 07/02/2014 5:19 PM

Record ID	Dispute ID Assigned	Entity Making Payment
10056	101	ABCDE Medical

Reason for Dispute:
The payment amount is incorrect. The amount received was 7,500 and needs to be updated.

[Continue](#)

Section 9.2d: Physician - Withdrawing a Dispute

Step 1: Access the Open Payments system via the CMS Enterprise Portal (<https://portal.cms.gov/>) and select the “Review and Dispute” tab.

Open Payments (Sunshine Act)


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Welcome to the Open Payments System

[Access the Open Payments User Guide](#)

[Need help with the website?
Contact Us by email](#)



Step 2: Select the teaching hospital and the appropriate program year you wish to review for data submitted by applicable manufacturers and applicable GPOs. Select “Show Records.”

Open Payments (Sunshine Act)

Physician [Switch User Type](#)



Review and Dispute Overview

A field with an asterisk (*) is required.

Physician Records

Select the reporting entity and program year for which records relating to payments or other transfers of value, or ownership or investment interests are disputed. Then select “Show Disputes.”

There is an initial 45-day period for physicians and teaching hospitals to review and dispute their data before it is made public. Following that initial 45 days is an additional 15-day correction period for reporting entities to work with physicians and teaching hospitals to resolve disputes.

Physicians and teaching hospitals may initiate disputes with reporting entities at any time, not just during the above-mentioned periods. Note the information below to understand how the dispute initiation and resolution timing affects public display of the data.

- Disputes initiated within the initial 45-day review and dispute period, and resolved by the end of the additional 15-day correction period, will be published and tagged as non-disputed in the September 2014 publication of the data.
- Disputes initiated within the initial 45-day review and dispute period, and NOT resolved by the end of the additional 15-day correction period, will be published and tagged as disputed in the September 2014 publication of the data.
- Disputes initiated after the 45-day review and dispute period, and resolved by the beginning of the following review period, will be published and tagged as non-disputed in both the September 2014 data publication and subsequent data publications (however, the values of the published data will be different for each of these publications, per the dispute resolution).
- Disputes initiated after the 45-day review and dispute period, and NOT resolved by the beginning of the following review period, will be published and tagged as non-disputed in the current display status (September 2014) and tagged as disputed in the upcoming data release display status.

Only records for which initial attestation was completed before the start of the review and dispute period will be considered for publication in the September 2014 publication of data.

For a complete list of detailed rules around data publication, refer to the [Open Payments User Guide](#).

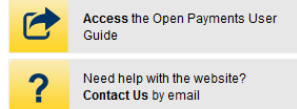
*Choose a Physician:

John Doe

*Program Year:

2013

Show Records



Open Payments User Guide

Step 3: On the Records page, you will see a list of all submitted records for the chosen physician. If you wish, you may filter the records by selecting the “Entity Making Payment” from the specified drop-down. You may also filter further by including the Record ID, Date of Publication and/or Dispute ID. You do not need to filter the results in order to proceed. Scroll to the right and select “View” under the column title “View Record” to view the record details. Please note that this information is only available on the Open Payments system, and cannot be downloaded.

Select the disputed record(s) you wish to withdraw. You may only withdraw disputes on records with a review and dispute status of “[Initiated](#)” or “[Acknowledged](#).” When the record(s) has been selected, select “Withdraw Dispute.”

Open Payments (Sunshine Act)

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Review and Dispute - John Doe - 2013

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The table below contains only the records reported for the selected physician during the selected program year.

The list is organized by reporting entity, including reporting entities that reported made payments or other transfers of value to the physician, and reporting entities in which the physician has ownership or investment interests.

Only records that have been attested to by reporting entities will be displayed. Records that have not yet been attested to or are still being processed by a reporting entity will be made available for review only after attestation has been completed.

Please note: There is a horizontal scroll bar below the table, for you to use to view more columns in the table. Use the filtering tools below to customize your view of the disputed records.

To take an action related to a disputed record, select the check box in the first column of the table (next to the Entity Making Payment column). You may then perform the following actions on the selected record(s):

- Select “Affirm Record” to confirm the payment or other transfer of value, or ownership or investment interest.
- Select “Dispute Record” to dispute the payment or other transfer of value, or ownership or investment interest. You will need to provide a reasonable explanation for your dispute of the record.
- Select “Withdraw Dispute” to acknowledge that the physician is no longer disputing the record.

To return to the previous page, select “Back.”

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

Physician Records

Entity Making Payment:	Record ID:	Date Of Publication:
<input type="text" value="Please Select"/>	<input type="text"/>	<input type="text" value="Please Select"/>
Dispute ID:	Review and Dispute Status:	Payment Category:
<input type="text"/>	<input type="text" value="Initiated"/> <input type="text" value="Acknowledged"/> <input type="text" value="Resolved No Change"/> <input type="text" value="Withdrawn"/> <input type="text" value="Resolved"/>	<input type="checkbox"/> General Payments <input type="checkbox"/> Research Payments <input type="checkbox"/> Ownership or Investment Interest
		Affirmed (Yes/No): <input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="button" value="Search"/> <input type="button" value="Clear All"/>

Showing Results for:[All]

Show Entries

[Affirm Record](#)

[Dispute Record](#)

[Withdraw Dispute](#)

Select	Entity Making Payment	Record ID	Dispute ID	Payment Category	Form Of Payment or Transfer of Value	Nature Of Payment or Transfer of Value	Date of Payment	Amount(\$)	Delay in Publication of Research Payment Indicator	Last Modified Date	Current Record Standing
<input checked="" type="checkbox"/>	ABCDE Medical	10056	181	General Payments	Cash or cash equivalent	Grant	2013-10-21	\$7,500.00	No	2014-07-02	Attested
<input type="checkbox"/>	ABCDE Medical	10054		General Payments	Cash or cash equivalent	Consulting Fee	2013-11-04	\$5,000.00	No	2014-07-02	Attested
<input type="checkbox"/>	ABCDE Medical	10055		General Payments	Cash or cash equivalent	Education	2013-12-11	\$1,500.00	No	2014-07-02	Attested

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Step 4: Review the information on the “Withdraw Disputes” page. When finished, select “Withdraw Disputes.”

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Withdraw Disputes

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Select “Withdraw Disputes” to confirm the withdrawal of the selected dispute(s). Once the dispute is withdrawn, the status of the dispute will be displayed as “Withdrawn.”

To return to the previous page, select “Cancel.”

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

You are withdrawing the following [1] dispute(s):

Dispute ID	Record ID	Date of Payment	Amount (\$)	Entity Making Payment	Review and Dispute Status	Record Status	Date Dispute Initiated
181	10056	2013-10-21	\$7,500.00	ABCDE Medical	Initiated	Attested	2014-07-02

[Cancel](#)

[Withdraw Disputes](#)

Open Payments User Guide

The following message will be displayed on the screen. An email notification will be sent to the reporting entity.

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Review and Dispute - John Doe - 2013

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You have successfully withdrawn the following dispute(s):

Record Id Dispute Id

10056 181

An email has been sent to notify the reporting entity.

The table below contains only the records reported for the selected physician during the selected program year.

The list is organized by reporting entity, including reporting entities that reported made payments or other transfers of value to the physician, and reporting entities in which the physician has ownership or investment interests.

Only records that have been attested to by reporting entities will be displayed. Records that have not yet been attested to or are still being processed by a reporting entity will be made available for review only after attestation has been completed.

Please note: There is a horizontal scroll bar below the table, for you to use to view more columns in the table. Use the filtering tools below to customize your view of the disputed records.

To take an action related to a disputed record, select the check box in the first column of the table (next to the Entity Making Payment column). You may then perform the following actions on the selected record(s):

- Select "Affirm Record" to confirm the payment or other transfer of value, or ownership or investment interest.
- Select "Dispute Record" to dispute the payment or other transfer of value, or ownership or investment interest. You will need to provide a reasonable explanation for your dispute of the record.
- Select "Withdraw Dispute" to acknowledge that the physician is no longer disputing the record.

To return to the previous page, select "Back."

For more information about the review and dispute process, refer to the [Open Payments User Guide](#).

Physician Records

Entity Making Payment:

Please Select

Record ID:

Date Of Publication:

Please Select

Dispute ID:

Review and Dispute Status:

Initiated
Acknowledged
Resolved No Change
Withdrawn
Resolved

Payment Category:

☐ General Payments
☐ Research Payments
☐ Ownership or Investment Interest

Affirmed (Yes/No):

☐ Yes
☐ No

[Search](#)

[Clear All](#)

Showing Results for:[All]

Show Entries 10

[Affirm Record](#)

[Dispute Record](#)

[Withdraw Dispute](#)

	Nature Of Payment or Transfer of Value	Date of Payment	Amount(\$)	Delay in Publication of Research Payment Indicator	Last Modified Date	Current Record Standing	Review and Dispute Status	Date Dispute Initiated	Dispute Last Modified By	Affirmed (Yes/No)	History Of Dispute	View Record
1	Grant	2013-10-21	\$7,500.00	No	2014-07-02	Attested	Withdrawn	2014-07-02	John Doe	No	View	View
1	Consulting Fee	2013-11-04	\$5,000.00	No	2014-07-02	Attested				Yes		View
1	Education	2013-12-11	\$1,500.00	No	2014-07-02	Attested				No		View

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