Open Payments Change Summary: Program Years 2021-2022 Submission Data Mapping Document

Centers for Medicare & Medicaid Services

October 2023

Version 2.1

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1   Introduction

This document lists the changes made to the Submission Data Mapping Document and comma separated value (CSV) templates (also known as sample files) for Program Years 2021-2022 since their last publication.

These changes are being provided to applicable manufacturers and applicable Group Purchasing Organizations (GPOs) to aid in data collection activities for Program Years 2021-2022. The changes described in this document should **not** be implemented for the Program Years 2016-2020 Submission Data Mapping Document/CSV templates nor for the Program Year 2023 and Onwards Submission Data Mapping Document/CSV templates.

This document is organized into the following sections:

- General updates;

- Changes to the four tabs of the Submission Data Mapping Document (General Payments tab, Research Payments tab, Physician Ownership tab, and Allowed Special Characters); and

- Changes to CSV templates/sample files.

To understand changes to the Submission Data Mapping Document, follow these steps:

1. Note which tab in the Submission Data Mapping Document is affected. Then, note the Data Element Name and the Data Element Number (DE#) for a specific entry. The change to the Data Element is listed below the Data Element Name and Data Element Number.
2. In the Submission Data Mapping Document, select the affected tab and then find the corresponding Data Element Number located in Column A and the Data Element Name listed in Column B.
3. Once you have located the Data Element Name and Data Element Number in the Submission Data Mapping Document, you can match it to the update(s) noted in this document.

2   Changes Made in October 2023

2.1   Changes to the Submission Data Mapping Document

This section of the Change Summary Document lists the changes made to the Submission Data Mapping Document in October 2023. This creates version 2.1 of the Program Years2021-2022 Submission Data Mapping Document. These changes are effective for the PY2023 data collect submitted in the Open Payments system in Calendar Year (CY)2024.

This Submission Data Mapping Document should be used when submitting payments or other transfers of value for Program Years 2021-2022. To submit payments or other transfers of value for other program years, refer to the Program Years 2016-2020 Submission Data Mapping Document and Program Years 2023 - Onwards Submission Data Mapping Document.

2.1.1   General Updates
- The Submission Data Mapping Document and Change Summary File on the Centers for Medicare & Medicaid Services (CMS) Open payments Resources page are named:
  - PY 2021-2022 Submission Data Mapping Document [XLSX]
  - Change Summary: Program Years 2021-2022 Submission Data Mapping Document [PDF]

2.1.2   Changes to the General Payments (Non-Research) Tab
- (DE#4) Data Element Name: Resubmission File Indicator
  - Updated "Format" (Column E) to remove: "R" = Renew Delay in Publication
  - Updated "Validation Rules" (Column H) to remove: "R" in the first bullet
  - Updated "Validation Rules" (Column H) to remove: If "R" is provided, only DE# 2, 3, 4, 34, 35, 37, and 50 are required for the record. All other fields are optional.
- (DE26) Data Element Name: Related Product Indicator
  - Updated Additional Notes (Column K) to remove: DE# 27-31
  - Updated Additional Notes (Column K) to add: DE# 27-32
- (DE#35) Data Element Name: Resubmitted Payment Record ID
  - Updated "Required?" (Column F) to remove: ", R"
- (DE#36) Data Element Name: Previously Deleted Indicator
  - Added "Data Element Name" (Column B) to include: Previously Deleted Indicator
  - Added "Definition/Description" (Column C) to include: Identifies whether the payment or other transfer of value was previously submitted, attested, and then deleted. If the payment was not made in relation to previously attested and deleted payment record, select "No". If the payment was related to a payment that was previously submitted, attested, and then deleted, select "Yes".
  - Added "Data Type" (Column D) to include: Boolean
  - Added "Format" (Column E) to include: "Y" = Yes; "N" = No

- Added "Required?" (Column F) to include: Yes

- Added "Field Size" (Column G) to include: 1 Char

- Added "Validation Rules" (Column H) to include: Validates that only character "Y or "N" is provided

- Added "Publicly Displayed" (Column I) to include: No

- Added "CSV Field Name" (Column J) to include: PREVIOUSLY_DELETED_INDICATOR

- Added "Additional Notes" (Column K) to include: This new field will become effective in CY2024 for PY2023 submissions.

- Added "Allowed Special Characters" (Column L) to include: No, only values given in Format Column E are allowed

- (DE#37) Data Element Name: Previously Deleted Payment Record ID

  - Added "Data Element Name" (Column B) to include: Previously Deleted Payment Record ID

  - Added "Definition/Description" (Column C) to include: The Payment Record ID for the original payment/transfer of value record ID that was provided by the Open Payments system that has since been attested and then deleted.

  - Added "Data Type" (Column D) to include: Numeric

  - Added "Format" (Column E) to include: Numeric digits only

  - Added "Required?" (Column F) to include: Yes IF DE# 36 Previously Deleted Indicator = "Y" (Yes); IF DE# 36 Previously Deleted Indicator = "N" (No), this field must be blank

  - Added "Field Size" (Column G) to include: System generated ≤ 38 digits

  - Added "Validation Rules" (Column H) to include: Validated against data type, format, and field size (columns D, E, G); Matches the Initial Payment Record ID in Open Payments

  - Added "Publicly Displayed" (Column I) to include: No

  - Added "CSV Field Name" (Column J) to include: PREVIOUSLY_DELETED_PAYMENT_RECORD_ID

  - Added "Additional Notes" (Column K) to include: This new field will become effective in CY2024 for PY2023 submissions. The record ID entered in this field must be the record ID of a previously deleted record. Use the "Download Attested Deleted Record" utility from the Submissions Page to get the original record ID that was previously submitted, attested, and then deleted.

  - Added "Allowed Special Characters" (Column L) to include: No, only numeric values are allowed

- (DE#51) Data Element Name: Contextual Information

  - Updated "Required?" (Column F) to remove: Yes IF DE#50, Delay in Publication of Research Payment Indicator = "1" or "2"

  - Updated "Required?" (Column F) to add "No"

- (Prev DE#50) Data Element Name: Delay in Publication of Research Payment Indicator

    - Removed "Data Element Name" Column B: Delay in Publication of Research Payment

    - Removed "Definition/Description" (Column C) to include: Indicator showing if an Applicable Manufacturer/Applicable GPO is requesting a delay in publication of a payment or other transfer of value when the payment or transfer of value is made in connection with: (1) research on or development of a new product (drug, device, biological, or medical supply) or (2) clinical investigation regarding a new product (drug, device, biological, or medical supply).

        - If the Delay in Publication of Research Payment Indicator equals "1" or "2", indicate the name of the related research study in DE#49, "Contextual information."

        - Applicable Manufacturers/GPOs not requesting a delay in publication of a payment or other transfer of value should select (3), not requesting a delay in publication, to indicate that no delay is requested.

        - CMS will display payments or other transfers of value no later than four years after the initial request for delay in publication of the payment or transfer of value.

    - Removed "Data Type" (Column D): Enumeration

    - Removed "Format" (Column E): "1" = R&D on New Product, "2" = Clinical Investigation on New Product"3" = No Delay Requested

    - Removed "Required?" (Column F): No

    - Removed "Field Size" (Column G): 1 Char

    - Removed "Validation Rules" (Column H): Limited to numeric characters "1," "2," or "3"; Validated against CMS approved data sources

    - Removed "Publicly Displayed" (Column I): Yes

    - Removed "CSV Field Name" (Column J): DELAY_IN_PUBLICATION_OF_RESEARCH_PAYMENT_INDICATOR

    - Added "Additional Notes" (Column K) to include: Delay in Publication will be removed for all General Payments starting with the CY2024 submissions window.

    - Removed "Allowed Special Characters" (Column L): No, only values given in Format Column E are allowed

- (DE#) Data Element Number:

    - Due to the addition of new data elements, Previously Deleted Indicator (DE#36) and Previously Deleted Payment Record ID (DE#37), other data element numbers (Column A) were renumbered. For example, the data element labeled "Total Amount of Payment" was renumbered from DE#36 to DE#38. Further, all other fields that referred to previous data elements DE#36 to DE#51 have been amended to refer to the new numbering.

2.1.3   Changes to the Research Payments Tab
- (DE#27) Data Element Name: Related Product Indicator

- Updated Additional Notes (Column K) to remove: DE# 28-32
- Updated Additional Notes (Column K) to add: DE# 28-33
- (DE#37) Data Element Name: Previously Deleted Indicator

  - Added "Data Element Name" (Column B) to include: Previously Deleted Indicator
  - Added "Definition/Description" (Column C) to include: Identifies whether the payment or other transfer of value was previously submitted, attested, and then deleted. If the payment was not made in relation to previously attested and deleted payment record, select "No". If the payment was related to a payment that was previously submitted, attested, and then deleted, select "Yes".
  - Added "Data Type" (Column D) to include: Boolean
  - Added "Format" (Column E) to include: "Y" = Yes; "N" = No
  - Added "Required?" (Column F) to include: Yes
  - Added "Field Size" (Column G) to include: 1 Char
  - Added "Validation Rules" (Column H) to include: Validates that only character "Y or "N" is provided
  - Added "Publicly Displayed" (Column I) to include: No
  - Added "CSV Field Name" (Column J) to include: PREVIOUSLY_DELETED_INDICATOR
  - Added "Additional Notes" (Column K) to include: This new field will become effective in CY2024 for PY2023 submissions.
  - Added "Allowed Special Characters" (Column L) to include: No, only values given in Format Column E are allowed
- (DE#38) Data Element Name: Previously Deleted Payment Record ID

  - Added "Data Element Name" (Column B) to include: Previously Deleted Payment Record ID
  - Added "Definition/Description" (Column C) to include: The Payment Record ID for the original payment/transfer of value record ID that was provided by the Open Payments system that has since been attested and then deleted.
  - Added "Data Type" (Column D) to include: Numeric
  - Added "Format" (Column E) to include: Numeric digits only
  - Added "Required?" (Column F) to include: Yes IF DE# 37 Previously Deleted Indicator = "Y" (Yes); IF DE# 37 Previously Deleted Indicator = "N" (No), this field must be blank
  - Added "Field Size" (Column G) to include: System generated ≤ 38 digits
  - Added "Validation Rules" (Column H) to include: Validated against data type, format, and field size (columns D, E, G); Matches the Initial Payment Record ID in Open Payments
  - Added "Publicly Displayed" (Column I) to include: No
  - Added "CSV Field Name" (Column J) to include: PREVIOUSLY_DELETED_PAYMENT_RECORD_ID

- Added "Additional Notes" (Column K) to include: This new field will become effective in CY2024 for PY2023 submissions. The record ID entered in this field must be the record ID of a previously deleted record. Use the "Download Attested Deleted Record" utility from the Submissions Page to get the original record ID that was previously submitted, attested, and then deleted.

- Added "Allowed Special Characters" (Column L) to include: No, only numeric values are allowed

- (DE#48) Data Element Name: Principal Investigator Covered Recipient Indicator

  - Updated "Validation Rules" (Column H) to remove: ~~Physician~~ from the second bullet

- (DE#) Data Element Number:

  - Due to the addition of new data elements, Previously Deleted Indicator (DE#37) and Previously Deleted Payment Record ID (DE#38), other data element numbers (Column A) were renumbered. For example, the data element labeled "Total Amount of Research Payment (U.S. Dollars)" was renumbered from DE#37 to DE#39. Further, all other fields that referred to previous data elements DE#37 to DE#133 have been amended to refer to the new numbering.

2.1.4 Changes to the Physician Ownership Tab

- (DE#26) Data Element Name: Previously Deleted Indicator

  - Added "Data Element Name" (Column B) to include: Previously Deleted Indicator

  - Added "Definition/Description" (Column C) to include: Identifies whether the payment or other transfer of value was previously submitted, attested, and then deleted. If the payment was not made in relation to previously attested and deleted payment record, select "No". If the payment was related to a payment that was previously submitted, attested, and then deleted, select "Yes".

  - Added "Data Type" (Column D) to include: Boolean

  - Added "Format" (Column E) to include: "Y" = Yes; "N" = No

  - Added "Required?" (Column F) to include: Yes

  - Added "Field Size" (Column G) to include: 1 Char

  - Added "Validation Rules" (Column H) to include: Validates that only character "Y or "N" is provided

  - Added "Publicly Displayed" (Column I) to include: No

  - Added "CSV Field Name" (Column J) to include: PREVIOUSLY_DELETED_INDICATOR

  - Added "Additional Notes" (Column K) to include: This new field will become effective in CY2024 for PY2023 submissions.

  - Added "Allowed Special Characters" (Column L) to include: No, only values given in Format Column E are allowed

- (DE#27) Data Element Name: Previously Deleted Payment Record ID

    - Added "Data Element Name" (Column B) to include: Previously Deleted Payment Record ID

    - Added "Definition/Description" (Column C) to include: The Payment Record ID for the original payment/transfer of value record ID that was provided by the Open Payments system that has since been attested and then deleted.

    - Added "Data Type" (Column D) to include: Numeric

    - Added "Format" (Column E) to include: Numeric digits only

    - Added "Required?" (Column F) to include: Yes IF DE# 26 Previously Deleted Indicator = "Y" (Yes); IF DE# 26 Previously Deleted Indicator = "N" (No), this field must be blank

    - Added "Field Size" (Column G) to include: System generated ≤ 38 digits

    - Added "Validation Rules" (Column H) to include: Validated against data type, format, and field size (columns D, E, G); Matches the Initial Payment Record ID in Open Payments

    - Added "Publicly Displayed" (Column I) to include: No

    - Added "CSV Field Name" (Column J) to include: PREVIOUSLY_DELETED_PAYMENT_RECORD_ID

    - Added "Additional Notes" (Column K) to include: This new field will become effective in CY2024 for PY2023 submissions. The record ID entered in this field must be the record ID of a previously deleted record. Use the "Download Attested Deleted Record" utility from the Submissions Page to get the original record ID that was previously submitted, attested, and then deleted.

    - Added "Allowed Special Characters" (Column L) to include: No, only numeric values are allowed

- (DE#) Data Element Number:

    - Due to the addition of new data elements, Previously Deleted Indicator (DE#26) and Previously Deleted Payment Record ID (DE#27), other data element numbers (Column A) were renumbered. For example, the data element labeled "Dollar Amount Invested" was renumbered from DE#27 to DE#29. Further, all other fields that referred to previous data elements DE#26 to DE#31 have been amended to refer to the new numbering.

2.1.5 Allowed Special Characters Tab
- No changes were made to the Allowed Special Characters tab.

3   Changes Made to CSV Templates

- The CSV sample files to be used for submitting payments are named on the CMS Open payments Resources page as below:

  - PY 2021 - 2022 CSV Sample File: General Payments [CSV]

  - PY 2021 - 2022 CSV Sample File: Research Payments [CSV]

  - PY 2018 - Onwards CSV Sample File: Physician Owner/Investor [CSV]

- The CSV templates to be used for submitting payments are renamed within the Open payments system Resources tab as below:

  - PY 2021 - 2022 CSV Template File: Research Payments [CSV]

  - PY 2021 - 2022 CSV Template File: General Payments [CSV]

  - PY 2018 - Onwards CSV Sample File: Physician Owner/Investor [CSV]

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 to use with data collection and submission. A summary of changes made to the Submission Mapping Document since it was last updated in 2021. Review page 1 for detailed instructions on how to use this document to understand updates to the Submission Data Mapping Document. ONLY use this file for records dated on or after January 1, 2021, through December 31, 2022.

- **Date of document issuance:** 10/01/2023

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

- **Agency Identifier:** CPI DASG/CPI DTP/DASG/CPI 2684

- **Summary of Document:** Guidance for Reporting Entities to use with 2023 data collection and submission. A summary of changes made to the Submission Mapping Document since it was last updated in 2021.

- **Citation to statutory provision/regulation applicable to this document:**

  - **Statute citation:** SEC. 1128G. [42 U.S.C. 1320a-7h]

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