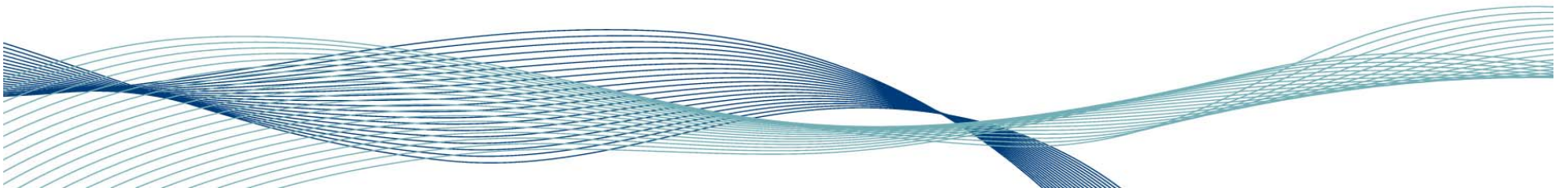




Speaker Programs: A Holistic Approach to Managing Risk

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Presenters



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Potential Challenges At Speaker Programs

Challenges can begin with any of the four roles



Reps



Speakers



Attendees



Bureau

Our Revelations from Conversations with Field Employees



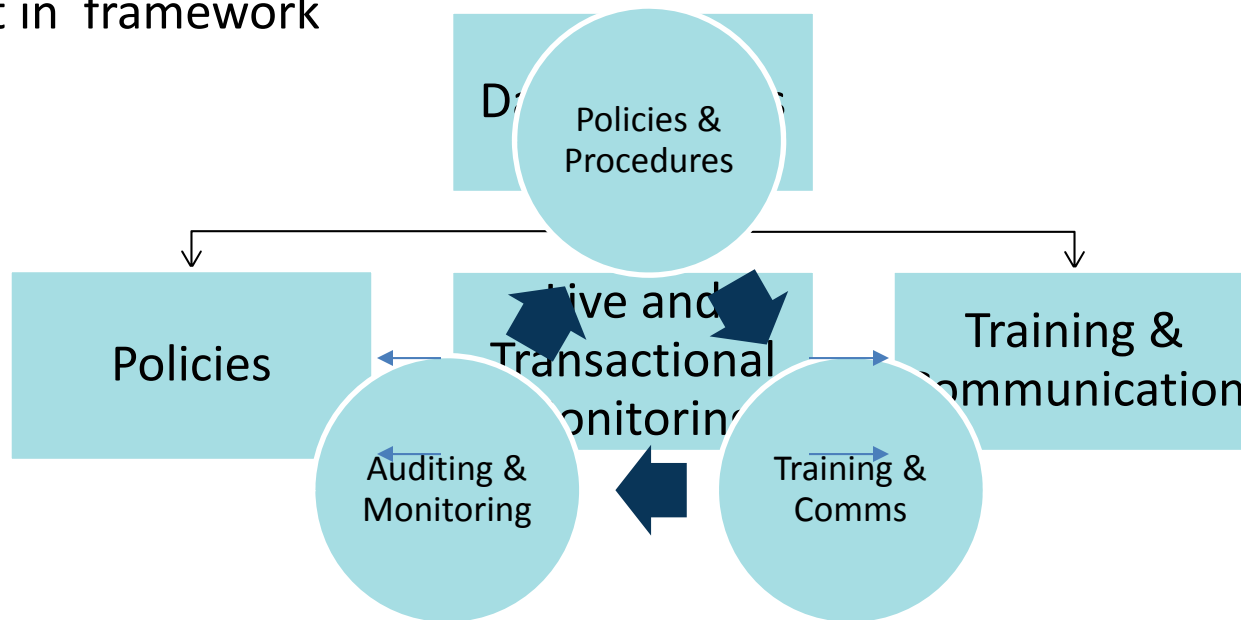
Compliance's Role: Provide the appropriate tools

Agenda

- Simplifying Policies
- Improving Traditional Training
- Developing Communications
- Holistic Approach to Monitoring

How to Mitigate the Risk Around Speaker Programs

- Examine tools and resources across four major pillars:
 1. Simplifying policies
 2. Engaging training
 3. Providing “pull” communications
 4. Holistic monitoring
- A shift in framework



Traditional Compliance Framework

What Should be Done with Policies

1. Simplify language
 - OIG recommends that codes, standards, and policies have an accessible language “no more than 10th grade reading level” using the Flesch Kincaid measuring standard*
2. Make policies as short as possible
3. Make policies accessible (e.g., via tablet)
4. Highlight key points
5. Provide audience specific content



* Measuring Compliance Program Effectiveness: A Resource Guide, Element 1: Standards, Policies, and Procedures, Section 1.3

A Couple of Practical Examples

Conciseness

“It is your responsibility to determine that the individual has an Approved Attendee designation, utilizing the HCP Look-Up Tool ... Additionally, you must confirm that: (1) each Approved Attendee has appropriate responsibility for patient care; and (2) the program content is relevant to the Approved Attendee’s role”

vs.

Attendees must be part of the approved target audience:

- On-label **Prescribers**
- Non-prescribers for whom the information is relevant ~~to their job function~~

Audience Specific

“Speakers have a maximum twelve month speaker compensation cap of \$60,000 per year.”

Challenges with Traditional Training

Traditional training provides the what, not the how

X

Covers facts, not grey areas

X

Limited time
(duration and frequency)

X

Negative attitudes

X

Isn't retained; not portable

X

Little sales input (if any)

X

Discounts relationships

Areas Not Covered by Policies

Are there areas not covered in your policies that might be beneficial to train on?

Challenges involving reps

- Attendance minimum not met
- Medical Information Requests not completed
- Adverse Events not captured
- Prescribing Information not given
- Representative provides medical advice
- Samples being used to circumvent insurance approval

Challenges involving attendees

- Attendees discuss patients and include PHI
- Attendees seek advice on ongoing off-label use
- Attendee arrives at the end of the presentation
- On-call attendee leaves early
- All attendees share speaker's practice
- Attendee brings a non-HCP guest

Challenges involving speakers

- Speaker tries to provide unapproved handouts
- Speaker beings presenting unapproved deck
- Speaker attempts to skip safety slides
- Speaker goes off-label

Challenges involving logistics

- Projector doesn't work
- Speaker is a "no show"
- Private room, but noise is distracting

What You Can Do to Improve Training



Remember adult learning principles – what’s in it for me?

Customize content to audience - Speak audience language



Provide timely topics and real-world scenarios

Provide insight on how to respond



Add gaming to live training

Kahoot! is free to use!



Leverage interactive tools in e-learning

Rapid development tools (e.g., Articulate, Brainshark) can make training engaging



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Focus on Timely and Situational Communication

Challenges with Communications

- Time-sensitive inbound communications
- Inconsistent accessibility of outbound
- Reaching agreement on the gray areas

Improving Communications

- Simplify Information for specific audience and topic
- Utilize “push” and “pull” tactics
- Provide on-demand access via iPad

Monitoring Types

Live

Can provide insight into interactions or materials used

Looking at data that cannot be assessed after the fact

Transactional

Can provide insight into compliance with policies on receipts, contracts, sign-in sheets, etc.

Looking at individual data points

Aggregate/Analytics

Can provide insight into frequency, trends, or outliers

Looking at the full data set

Examples of How This Works

SPEAKER PROGRAM RISKS	TYPE OF MONITORING
COMMUNICATION	
<ul style="list-style-type: none"> • Use of approved deck • Response to questions 	<ul style="list-style-type: none"> • Live • Live
SPEAKER COMPENSATION	
<ul style="list-style-type: none"> • Contract in place before engagement • Follows FMV • Frequency of cancelled paid programs 	<ul style="list-style-type: none"> • Transactional • Transactional • Aggregate/Analytics
LOGISTICS	
<ul style="list-style-type: none"> • Venue was conducive to educational presentation • Meal costs only included food, tax, and gratuity • Rep frequently goes over meal limit 	<ul style="list-style-type: none"> • Live • Transactional • Aggregate/Analytics
ATTENDEES	
<ul style="list-style-type: none"> • Receipts accurately documented for transparency • Attendees all present for presentation • Frequency of presentations for single attendee 	<ul style="list-style-type: none"> • Transactional • Live • Aggregate/Analytics

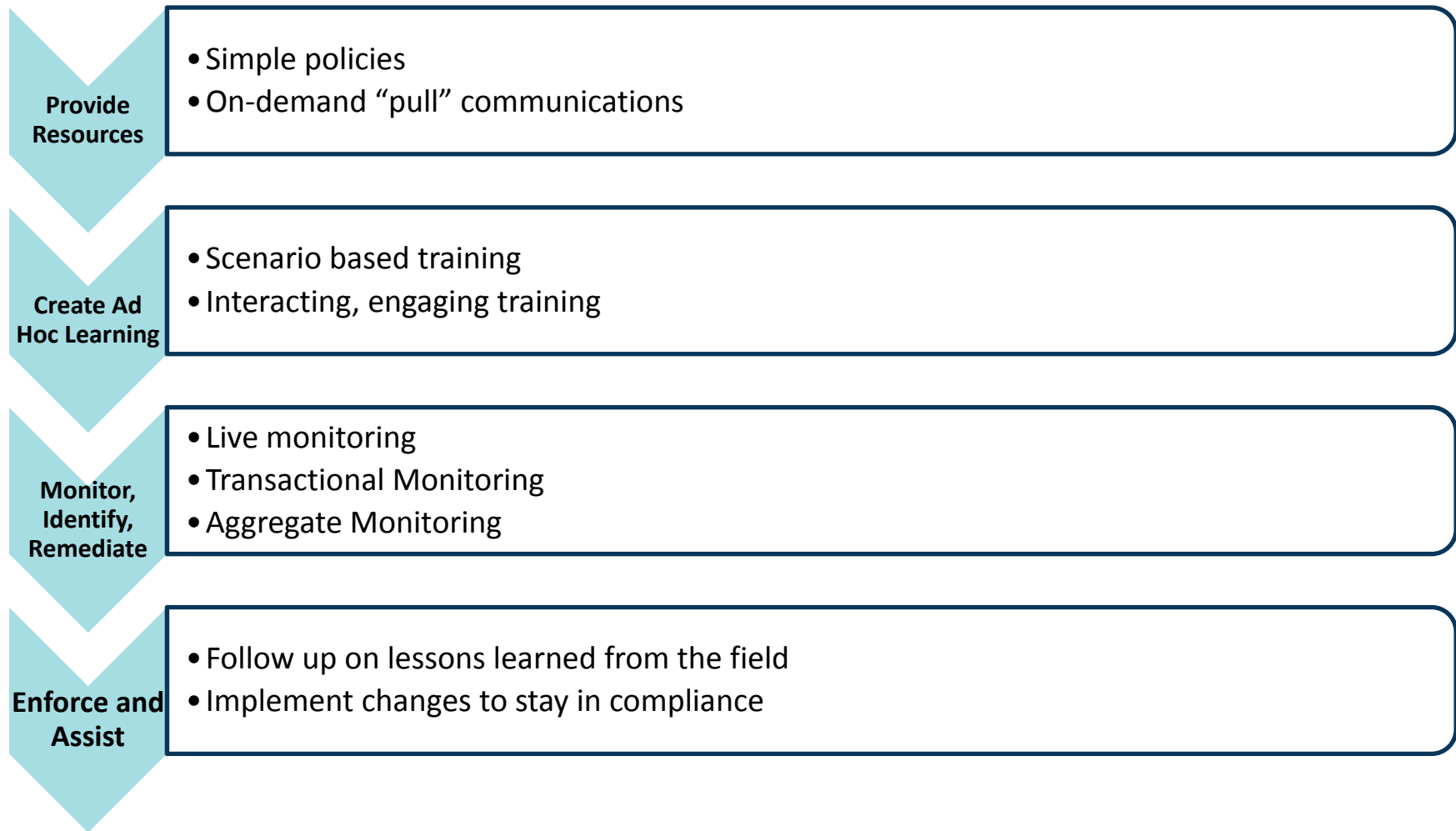


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Conclusion

A holistic approach to Speaker Programs can help minimize associated risks





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