PotomacRiver
PARTNERS

Commercial Observations from a Compliance Monitor

Adding Value to the Commercial Team

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Intro Page and Disclaimers

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  - 50+ clients & 60+ sales/services/clinical teams supported
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- Dan Koerner, Director, Potomac River Partners
  - 20 years industry experience
  - 10 years pharmaceutical compliance experience
  - Monitoring experience includes speaker programs, ride-alongs, speaker trainings, retrospective audits
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Presentation Overview

Questions for discussion:

- How can Compliance add value to Commercial/Business from monitoring and auditing?
- What has worked well at your companies?

Let's work together to:

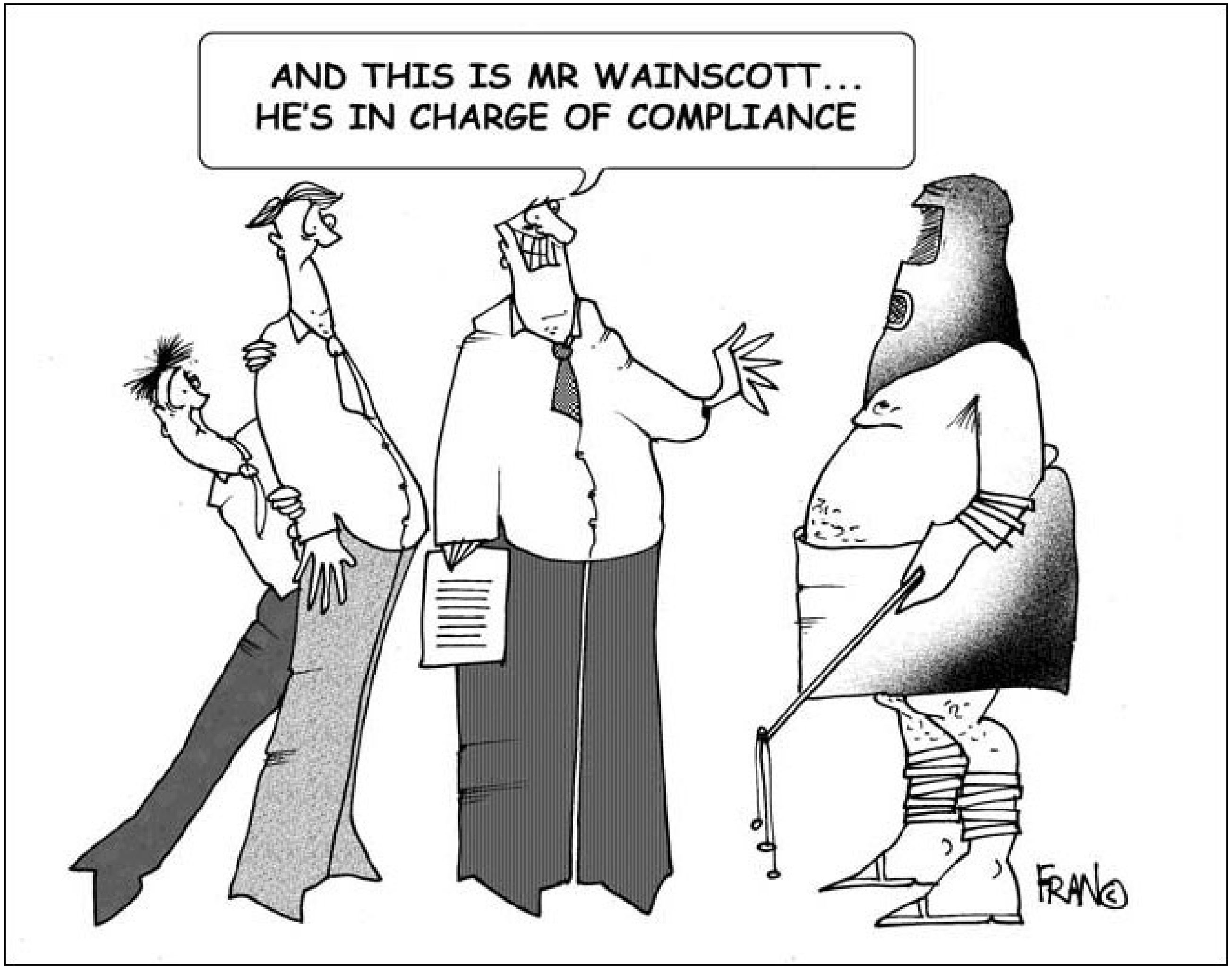
- Identify key topic areas to share insights
- Examine how sharing information with the Business gains acceptance of monitoring
- Implement realistic, practical solutions
  - Support compliance
  - Enhance the business

Thoughts on Compliance Monitoring/Auditing

When the business hears you plan on conducting live monitoring!

Thoughts on Compliance Monitoring/Auditing

When the field hears you are working with them..



Thoughts on Compliance Monitoring/Auditing

Let’s Work on Changing that Perception

Usually our focus is on Compliance, but what about providing useful information back to the business?

- Would you gain more acceptance/credibility?
- Can you help with commercial objectives?
- Will you modify your compliance program?
- Can you find business friendly solutions that are still compliant?

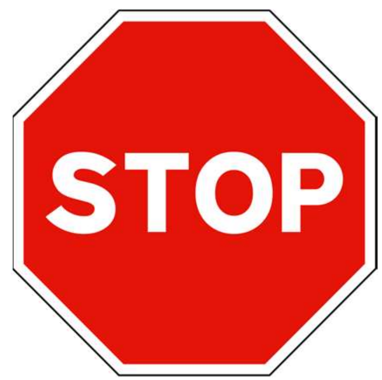
Business Observations from Compliance Monitoring

- Representatives have a job to do… and typically want to be compliant
- Restrictions sometimes make their job more difficult
- We tend to focus solely on compliance
- Sometimes we need to step back and….

..understand the business need!

Compliance should be a

not a



Speaker Programs: Overview of Observations

Venue

- Location
- Seating arrangements
- Service
- Steakhouse again?

Food

- Dietary restrictions
- Food quality
- Quantity of food
- Variety

Logistics & Planning

- Start/end times
- Attendees
- Speed of presentation
- Late location change
- Difficulty getting signatures

Other Items

- Speaker Quality
- Sign-in sheets
- External meetings (e.g., Nursing)
- Poorly arranged slides
- iPad issues

Speaker Program Examples

Example	Issue	Business Recommendation
Slides were cluttered	Attendees comment that they were unable to follow along	Modify the slides because the content was too hard to follow and present
MOA videos not playing in the presentation	Difficulties (e.g., poor Wi-Fi, not compatible, etc.) playing videos	Troubleshoot and find alternatives
Meals for the audience were not appropriate	Meals were not meeting the dietary restrictions of the attendees	Diversify meals (e.g., vegan, gluten-free) based on audience and religious holidays
Presentation start times exceeding 60 minutes	Attendees complained and could not stay for entire presentation	Recommendation to look at start times that are acceptable by location
Sign in sheets were cumbersome	Complaints from attendees and hosts	Potentially move to an iPad approach

Field Rides & In-Office Meals: Overview of Observations

Field Rides

- Adjusting call plans (e.g., adding/removing targets)
- Difficulty seeing HCPs
  - Institutional restrictions
  - Busy schedules
- Length of calls
- Call frequency
- Messaging and use of materials
- Difficulty using iPad (e.g., WiFi in rural areas)

Field Rides & In-Office Meals: Overview of Observations

In-Office Meals

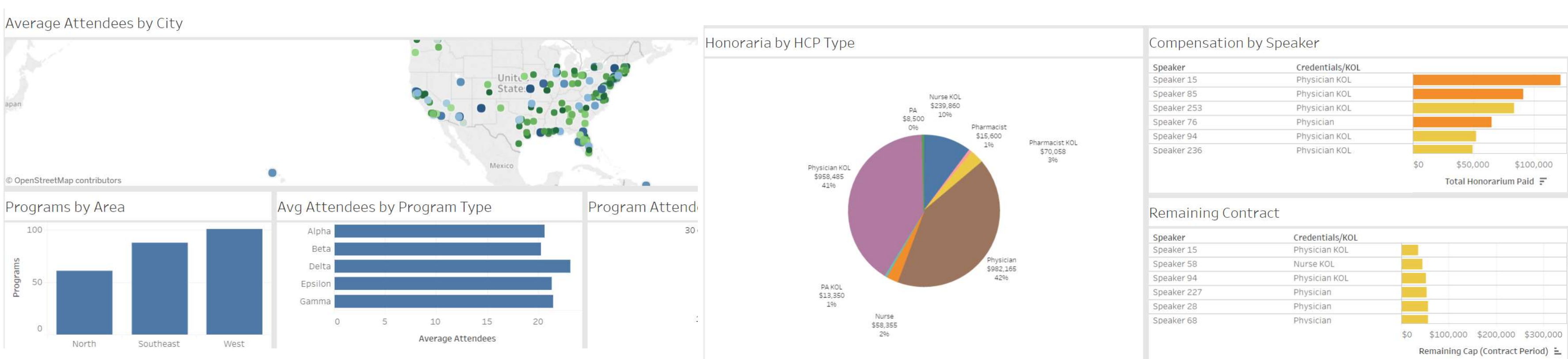
- Ordering too many meals
- Sign-in sheet issues
- Prescribers not showing up
- HCPs taking meals before the rep arrives
- Double-booked meals
- Breakfast vs. lunch vs. snack

Ride-Along and In-Office Meal Examples

Example	Issue	Business Recommendation
Adding/Deleting targets to a call plan	Reps complained that the process took too long and was problematic	Review and look at different options
Logging calls vs. details (minimum calls)	How do reps log calls if the office won't see or just delivering materials/samples	Determine and define calls, visits, or details
What works better: breakfast or lunch?	Multiple reps have complained to us that prescribers won't come in during lunches due to patient backlog	Recommended to reps that they could try to do breakfasts for some of the busier offices
Difficulty presenting from the iPad	iPads could not access detailing information due to WiFi	Recommendation to provide hard copy options

Data Audits and Dashboard Monitoring

- Data/Retrospective Audits
  - Sign-in sheet issues
  - Incorrect specialties
  - One person signing for multiple individuals
  - Issues with receipts
- Dashboards
  - Overuse of speakers
  - Meal spend by venue/region
  - Canceled programs/paid fees
  - Overuse of venues



Case Study: Sample Signature Auditing

Problem

- Sample signature audit
- Negative audit responses from a random sample of HCPs nationwide.
- The Business requested a corrective action.

Action

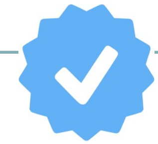
Compliance proposed a **Compliance Ambassadors** program.

Members:

- National Business Directors
- District Managers
- Compliance

Agenda:

- Design & implement Corrective Action Plan
  - ✓ Engage Ambassadors in retraining of field team



Business Approval

Result

- **Decrease in negative audit responses by 50%**
- Expansion of Compliance Ambassadors
- Improved the relationship between business and compliance

Case Study: Call Activity Review

Problem

- Retrospective audits and live monitoring identified ***potential call falsification***.
- The majority of identified cases were determined to be ***documentation errors***.

Action

Determined:

- Definition of a call not clearly defined as part of training materials
- Training for entering information was not adequate

Direction for these items was only provided verbally, and differed across Regions.

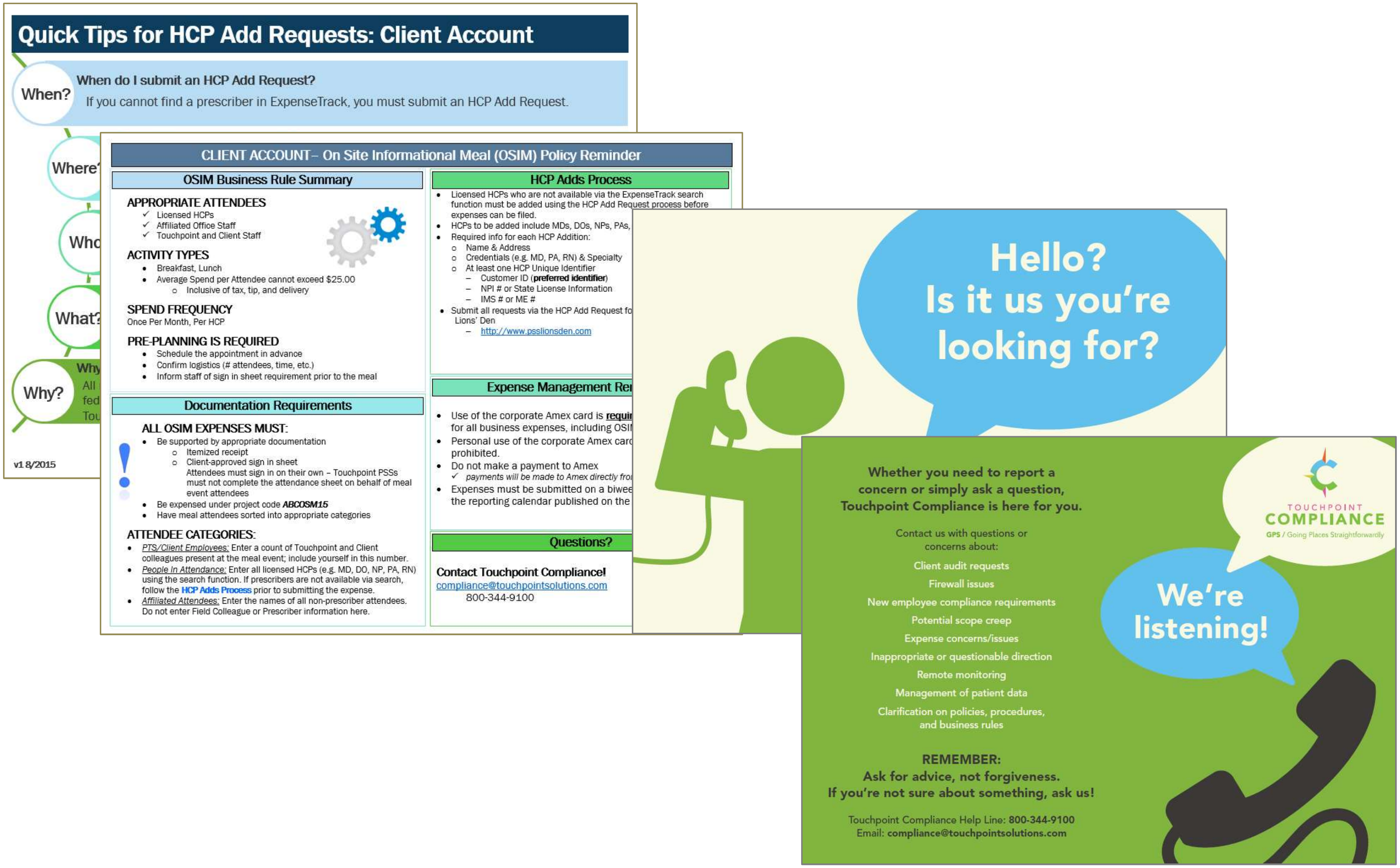
Compliance proposed:

✓ Revamp of new hire and existing training
✓ Business buy-in

Result

- Compliance conducted retrospective audit of call activity over next quarter
- 60% decrease in potential call concerns

Examples


Quick Tips for HCP Add Requests: Client Account
When?
When do I submit an HCP Add Request?
If you cannot find a prescriber in ExpenseTrack, you must submit an HCP Add Request.
Where?
Who
What?
Why?
v1 8/2015
CLIENT ACCOUNT– On Site Informational Meal (OSIM) Policy Reminder
OSIM Business Rule Summary
APPROPRIATE ATTENDEES
✓ Licensed HCPs
✓ Affiliated Office Staff
✓ Touchpoint and Client Staff
ACTIVITY TYPES
• Breakfast, Lunch
• Average Spend per Attendee cannot exceed $25.00
○ Inclusive of tax, tip, and delivery
SPEND FREQUENCY
Once Per Month, Per HCP
PRE-PLANNING IS REQUIRED
• Schedule the appointment in advance
• Confirm logistics (# attendees, time, etc.)
• Inform staff of sign in sheet requirement prior to the meal
Documentation Requirements
ALL OSIM EXPENSES MUST:
• Be supported by appropriate documentation
○ Itemized receipt
○ Client-approved sign in sheet
Attendees must sign in on their own – Touchpoint PSSs must not complete the attendance sheet on behalf of meal event attendees
• Be expensed under project code ABCOSM15
• Have meal attendees sorted into appropriate categories
ATTENDEE CATEGORIES:
• PTS/Client Employees: Enter a count of Touchpoint and Client colleagues present at the meal event; include yourself in this number.
• People In Attendance: Enter all licensed HCPs (e.g. MD, DO, NP, PA, RN) using the search function. If prescribers are not available via search, follow the HCP Adds Process prior to submitting the expense.
• Affiliated Attendees: Enter the names of all non-prescriber attendees. Do not enter Field Colleague or Prescriber information here.
HCP Adds Process
• Licensed HCPs who are not available via the ExpenseTrack search function must be added using the HCP Add Request process before expenses can be filed.
• HCPs to be added include MDs, DOs, NPs, PAs,
• Required info for each HCP Addition:
○ Name & Address
○ Credentials (e.g. MD, PA, RN) & Specialty
○ At least one HCP Unique Identifier
– Customer ID (preferred identifier)
– NPI # or State License Information
– IMS # or ME #
• Submit all requests via the HCP Add Request fo Lions' Den
– http://www.psslionsden.com
Expense Management Rei
• Use of the corporate Amex card is requi for all business expenses, including OSI
• Personal use of the corporate Amex car prohibited.
• Do not make a payment to Amex
✓ payments will be made to Amex directly fro
• Expenses must be submitted on a biwee the reporting calendar published on the
Questions?
Contact Touchpoint Compliance!
compliance@touchpointsolutions.com
800-344-9100
Hello?
Is it us you're looking for?
Whether you need to report a concern or simply ask a question, Touchpoint Compliance is here for you.
Contact us with questions or concerns about:
Client audit requests
Firewall issues
New employee compliance requirements
Potential scope creep
Expense concerns/issues
Inappropriate or questionable direction
Remote monitoring
Management of patient data
Clarification on policies, procedures, and business rules
REMEMBER:
Ask for advice, not forgiveness.
If you're not sure about something, ask us!
Touchpoint Compliance Help Line: 800-344-9100
Email: compliance@touchpointsolutions.com
TOUCHPOINT COMPLIANCE
GPS / Going Places Straightforwardly
We're listening!

How Do We Share Information?

Ongoing Conversations

- Discuss with Reps during field monitoring
- Monthly Brand Updates
- Quarterly Executive Leadership Updates

Empowering Field Leadership

- Compliance Ambassadors
- Business-oriented Onboarding
- Pilot changes with Field Leadership

Summary

Business value

Providing the business with helpful information can provide the business with a different prospective.

- Information may help you understand their difficulties
- Give the business assurance that you understand their difficulties
- Become partners to align the business strategy with compliance

Gaining Acceptance

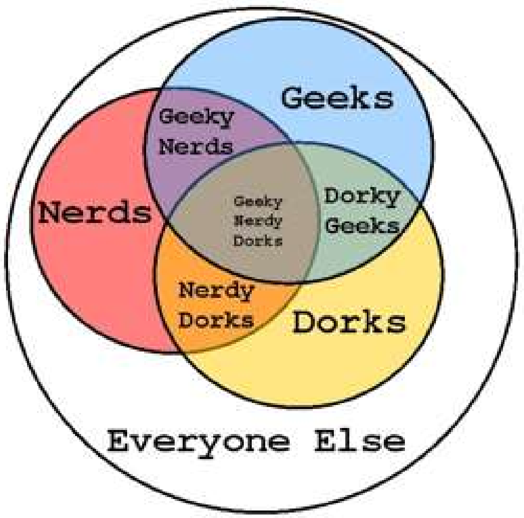
Compliance monitoring doesn’t need to be scary.

- Approach each activity as a place for you to learn from each other
- Allows the representative to look at you as a colleague instead of the “police”

And in closing

And in closing

Compliance



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Commercial

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