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## **Capturing the Right Information and Ensuring Its Accuracy**



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# Introductions



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\*Disclaimer: The views of the Novartis presenter reflect a personal perspective and should not be considered an endorsement by or specific views of Novartis Pharmaceuticals Corporation

# Aggregate Spend is only as good as the data YOU provide

GO . . .



**G** Getting

**R** Right

**E** Each &

**E** Every

**N** Name & Number

# Capturing the Correct Information and Ensuring Its Accuracy

## AGENDA

- ◆ Importance of Accuracy
- ◆ Critical Success Factors
- ◆ Leverage “Seven Element” Techniques

# Reports Are Only As Good As The Data Provided

- ◆ Why is accuracy so important?
- ◆ Scrutiny could come from internal and external sources

## Internal

- ◆ Aggregate spend / state law
- ◆ Legal inquiries
- ◆ Policy compliance
- ◆ Business decisions

## External

- ◆ Media
- ◆ HCOs
- ◆ Medical Associations
- ◆ Plaintiff's Bar
- ◆ Academic researchers

*The Boston Globe*

### **60 doctors took speaker fees from drug giant**

By Liz Kowalczyk

Globe Staff / September 29, 2009

# Capturing the Correct Information

## ◆ Regulatory Requirements

- Who received it? What for? When? How much?

## ◆ Additional context of the spend

- Who incurred the spend?
- Source system information and identifiers
- Additional items for additional uses (e.g., FMV Tier)



# Data Integrity: It's More Than Just the Customer Master!

## ◆ Finance Systems (e.g., SAP, Oracle)

- GL Codes
- HCP/HCO identifiers
- Multiple addresses
- Brand/cost center

## ◆ Travel & Entertainment

- Expense type
- Search vs. Add
- Selecting the wrong participant

## ◆ Third Party Supplier Data

- Logistics Suppliers, CROs, CSOs, Partner Agreements
- Event types
- HCP and HCO data
- Standardization with clear definitions
- Timely submission of data



# Critical Success Factors For Accurate Data

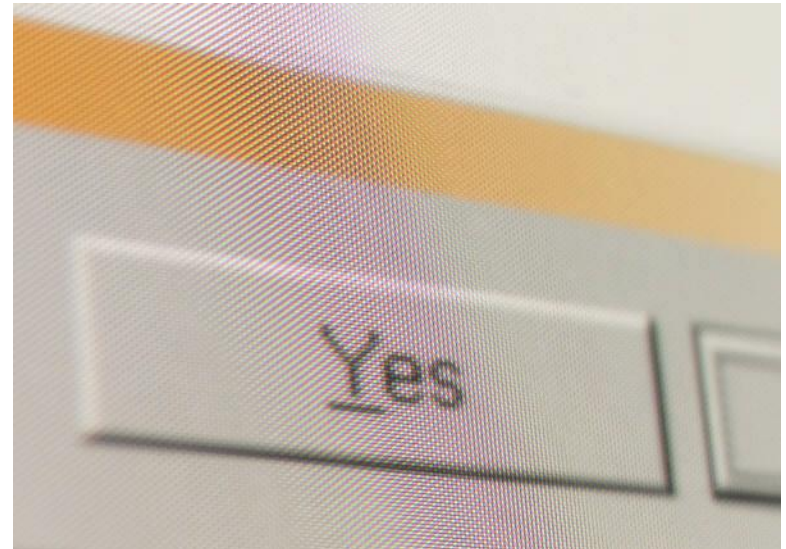
- ◆ Check validity of source systems
- ◆ Design systems that reduce human error (picklists vs. free text)
- ◆ Design front end views that make sense (e.g., HCP state in search)
- ◆ Standardize meeting and event processes with limited number of suppliers
- ◆ Document business rules as decisions are made and revisit periodically
  - ◆ Review the data, validate that decisions were executed as intended
- ◆ Sufficient unit testing (IT)
- ◆ Robust user acceptance testing (Business)





# Quality Control Mechanisms

- ◆ Accuracy vs. Bureaucracy
  - “Are you sure?” confirmations or attestations
  - Business monitoring before entry into aggregate spend (e.g., DM Review)
  - Appoint source system data stewards
- ◆ Automated business rules that flag potential errors (e.g., Albuquerque, MN)
- ◆ Source system accuracy
  - ✓ Upon introduction of new systems
  - ✓ Monitor more tightly for first four months



# Implementing Written Policies and Procedures

- ◆ Update policies for spend capture and “rules of the road”
- ◆ Know How Other Systems Operate
  - Define each spend type / data point
  - Create process to on-board a new supplier
  - Communicate how actions impact data
  - Assign clear roles and responsibilities (and potential limitations)
- ◆ Know Thyself
  - Business rules and assumptions document
  - List inputs, outputs
  - History of systems and processes



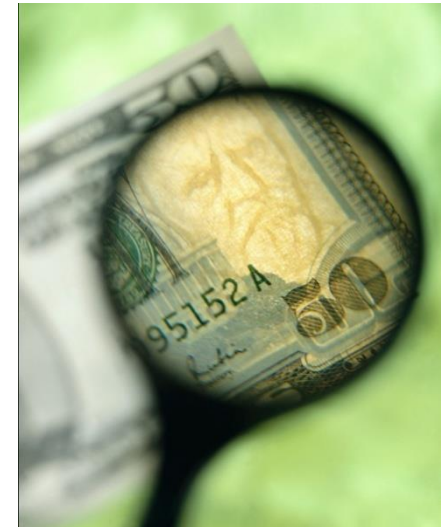
# Effective Training and Communication

- ◆ Identify stakeholders from departments across the entire organization
  - Develop training that shows how other's actions impact you
  - Train source systems owners to communicate their system changes
  - Develop business processes to look for and address data anomalies
- ◆ Training on policies, processes and best practices



# Monitoring

- ◆ Develop monitoring plan to review data on a consistent basis
- ◆ Designate Aggregate Spend data stewards
- ◆ Define exception processes
- ◆ Review across systems
  - Why don't the numbers match?
- ◆ Review data anomalies
- ◆ Look for outliers and unusual patterns
  - Perform data dumps with filters, sorts, zero people, incorrect roles



# Responding to Detected Problems, Taking Corrective Action

- ◆ Can you make corrections in your system? If so, how?
  - What constitutes a change?
  - Where do you make changes?
  - Who can make the changes? How will that be documented?
  - What constitutes resubmitting a report?



Thank You!



Go GREEN!

# Appendix - Auditing

- ◆ Conduct auditing in conjunction with underlying source systems for data integrity
  - Inspect not just what you have but consider also what you may be missing
  - Confirm consistency across sources
  
- ◆ Occasionally conduct granular reconciliation of data

SAMPLE

Item	Aggregate Spend	Source System	Sign-in Sheet	Receipt	Notes
Event Type	Speaker Program	Speaker Program	Speaker Program	-	All same
Event Date	Mar 4, 2010	Mar 4, 2010	Mar 4, 2010	Mar 4, 2010	All same
Host Name	Jane Doe	Jane Doe	Jane Doe	Jane Doe	All same
Venue	Renaissance Hotel	Renaissance Hotel	Renaissance Hotel	Renaissance Hotel	All same
# of HCPs	8	8	12	15 Total	Sheet > Source & Agg Spend
# of Non_HCPs	2	2	3		Sheet = Receipt
Total Amount	\$500	\$500	-	\$600	Receipt > Source & Agg Spend
<b>Per Person \$</b>	<b>\$50.00</b>	<b>\$50.00</b>		<b>\$40.00</b>	<b>OverReporting</b>

# Appendix - Certification

- ◆ Create Validation Reports
  - Provide more transaction level details to examine State or management reports
- ◆ How much data do you provide and to whom?
- ◆ How do others ensure accuracy?
- ◆ What is an “acceptable” error rate?
- ◆ What is your organization’s risk-averse? What other purposes are there for your data? What other controls are in place?

