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Global Transparency Trends & Challenges

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September 2018

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The Global Life Sciences Industry Continues To Be Challenged By Changing Perceptions And Expectations

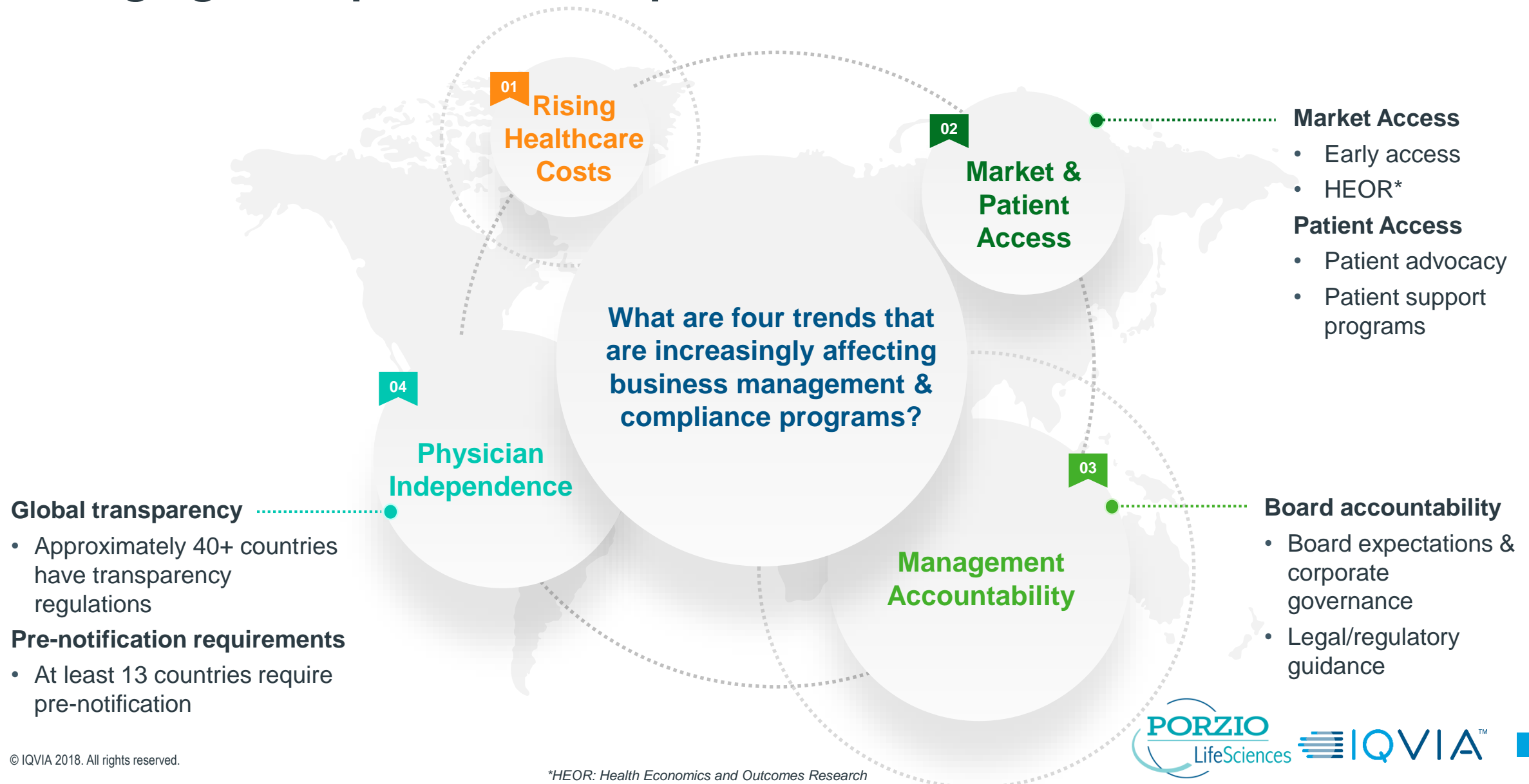


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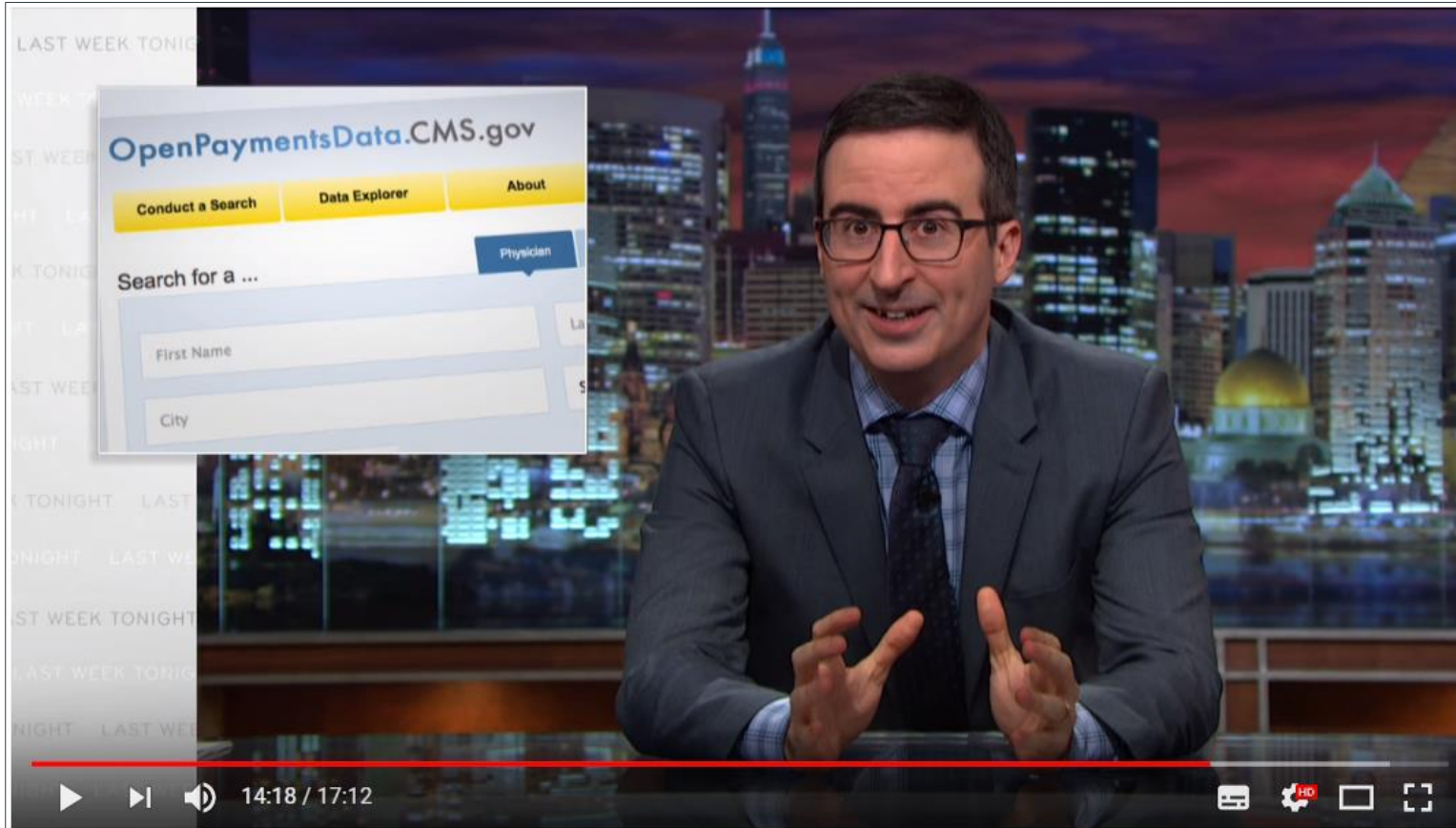
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Marketing To Doctors By John Oliver (HBO)

<https://www.youtube.com/watch?v=YQZ2UeOTO3I>



The video player shows John Oliver speaking, with a screenshot of the **OpenPaymentsData.CMS.gov** website overlaid. The website has a navigation bar with 'Conduct a Search', 'Data Explorer', and 'About'. Below is a search section titled 'Search for a ...' with a 'Physician' dropdown menu and input fields for 'First Name' and 'City'. The video player interface includes a progress bar at 14:18 / 17:12 and standard playback controls.

Marketing to Doctors: Last Week Tonight with John Oliver (HBO)

8 616 412 vues

69 K 1 K PARTAGER

Transparency: It Is All About The Reputation...

June 2015, immediately after the full 2014 US data disclosure the Transparency subject makes it to the headlines of the top papers



Transparency: It Is All About The Reputation...

Recent Media Coverage in the US

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Drug largess makes doctors rich, patients addicts

By Jill Riepenhoff, Megan Luther and Lee Zurik | Raycom News Network | Mar 27, 2018

CNN Exclusive: The more opioids doctors prescribe, the more money they make

Story by Aaron Kessler, Elizabeth Cohen and Katherine Grise, CNN
Video by Elizabeth Cohen and John Bonifield, CNN
Updated 8:45 AM ET, Mon March 12, 2018

WELL | LIVE

The More Lavish the Gifts to Doctors, the Costlier the Drugs They Prescribe

By NICHOLAS BAKALAR | OCT. 25, 2017

How and why millions of dollars in Big Pharma money is flowing to New York doctors

David Robinson, drobinson@lohud.com | Published 6:00 a.m. ET Oct. 18, 2017 | Updated 6:22 a.m. ET Oct. 18, 2017



David Weinreich, MD, Senior Vice President, Global Clinical Development at Regeneron Pharmaceuticals in Tarrytown on Sept. 21, 2017. Peter Carr/lohud

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ChicagoTribune

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Are drug firms paying your doctor? Illinois doctors accepted \$74.1M in industry payments last year

Business



Transparency: It Is All About The Reputation...

June 2016, the press commented on the first disclosure in the United Kingdom



What are they hiding? A THIRD of health workers including top doctors refuse to admit if they've been given lavish perks or payments by drug firms

By PRESS ASSOCIATION and SOPHIE BORLAND, HEALTH EDITOR FOR THE DAILY MAIL
PUBLISHED: 22:24 GMT, 30 June 2016 | UPDATED: 17:03 GMT, 1 July 2016



A third of doctors are refusing to disclose whether they have been put up in hotels or flown around the world by drugs giants, experts claim. A register has been created following allegations firms are bribing medicine (file pic)



Transparency: It Is All About The Reputation...

Media Coverage in Australia – Summer 2016, the press commented on the first individual disclosure

National | World | Lifestyle | Travel | Entertainment | Technology | Finance | Sport | Video

Doctors paid \$39,000 a year by the drug companies whose medicine they prescribe

AUGUST 31, 2016 9:00PM



Australian doctors and researchers are receiving tens of thousands of dollars from pharmaceutical companies for speaking engagements and expenses.

DRUG companies have for the first time revealed how they are paying Australian doctors up to \$19,000 for overseas trips, and more than \$18,000 in speaking and consultancy fees to spruik and critique their medicines.

Doctors shared in \$8.5 million in payments in the six months between October 2015 and April 2016.

One in three doctors refused to allow drug companies to publish how much they received.

[Professor Andrew Carr](#) who received more than \$39,000 from drug company [Gilead](#) was the doctor who received the most drug company payments in the six months to April 2016.

Gilead has just received a government subsidy for its \$19,000 per patient per month Hepatitis C cure Sovaldi.

Professor Carr was paid \$18,960 in consultancy fees and over \$19,000 in travel and accommodation expenses by Gilead in the six months between October 2015 and April 2016.

Drug companies paying doctors millions Australia report reveals

Daniel Burdon and Julia Medew

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Drug companies have paid Australian doctors and nurses more than \$64 million since April 2015 to attend educational events and advisory group meetings and to act as consultants to the industry.

A new report that names those doctors and nurses for the first time has revealed thousands of them shared in about \$8.5 million from 35 drug companies during the six months to April this year.

Transparency: It Is All About The Reputation...

Media Coverage in Australia – Summer 2016, the press commented on the first individual disclosure



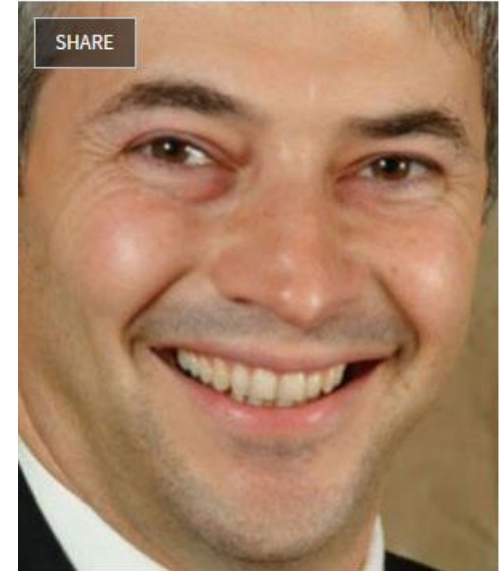
Professor Andrew Carr. Photo: Sydney Pathology



Professor Merlin Thomas (right) was paid more than \$35,110.



Dr Mark O'Reilly received \$30,635.



Professor Rodney Sinclair was paid \$22,617.

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Sample Of Transparency Trends And Approaches

Detailed disclosure regarding the nature and scale of the interactions between the industry and healthcare professionals and organizations

North America

- USA (Federal & State Laws)
- Canada (upcoming provincial Laws)
- Mexico (upcoming)

South America

- Brazil (Minas Gerais State Law)



Europe

- EFPIA Code ⁽¹⁾
- MedTech Europe Code ⁽²⁾
- Medicines for Europe Code ⁽³⁾
- National Laws

Asia Pacific

- Japan (Code)
- Australia (Code)
- South Korea (Law)
- Philippines (Law)
- Indonesia (Law)

Africa

- Mecomed Code ⁽⁴⁾ – MENA ⁽⁵⁾ region
- Saudi Arabia (upcoming Law)

Trend: More and more transparency regulations all over the world

(1) EFPIA – European Federation of Pharmaceutical Industries Association – HCP/HCO Disclosure Code
(2) MedTech Europe – Code of Ethical Business Practice
(3) Medicines for Europe – Code of Conduct
(4) Mecomed – Medical Devices, Imaging and Diagnostics Trade Association
(5) MENA – Middle East and North Africa





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Transparency Requirements Continue To be More Stringent And Significantly Growing In Life Sciences

COVERAGE	MONITORING	DISCLOSURE	ANALYTICS
			
More industries and more geographies along with more touch-points	Closely monitor interactions between life science industries and HCP/O	Reinforce accuracy and completeness of the publication of Transfers of Value	Ability to gain insight from aligned data sets
IMPLICATION Organizations must implement scalable, robust and flexible solutions to deal with diverse requirements	IMPLICATION Better manage HCP/HCO interactions to minimize risks of unethical behaviours, corruptions, bribery, false claims	IMPLICATION Publish all interactions with HCP/O ensuring greater transparency and compliance with data privacy regulations	IMPLICATION Enable manufacturers to gain a 360 view on their spending to HCP/O and potentially benchmark against their competitors



United States – Enforcement Actions

Approved: _____

Approved: _____

10. As a District Manager, JONATHAN ROPER, the defendant, was responsible for the sales territory that included Doctor-1 and Doctor-2, who both served as Speakers for Pharma Company-1 during ROPER's tenure as District Manager. ROPER also served as the SSP assigned to Doctor-1 and Doctor-2 prior to ROPER's promotion to District Manager. Based on my review of publicly available data maintained by the Centers for Medicare and Medicaid Services ("CMS") regarding remuneration provided by pharmaceutical companies to doctors, I know that Doctor-1 and Doctor-2 were both highly compensated by Pharma Company-1 during ROPER's tenure as a result of their participation in the Speaker Program. By way of example, in 2014, Pharma Company-1 reported to CMS that it made payments of approximately \$147,245 in Speaker Program fees to Doctor-1 and payments of approximately \$112,340 in Speaker Program fees to Doctor-2. In 2014, Doctor-1 and Doctor-2 were two of the top recipients of Speaker Program fees from Pharma Company-1 in the entire United States.

kind, to a person to induce such person to purchase, lease, order, and arrange for and recommend purchasing, leasing, and ordering a good, facility, service, and item for which payment may be made in whole and in part under a Federal health care

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The Facts About Open Payments Data

What are the different payment types?

PROPUBLICA | See more at VITAL SIGNS

DONATE

All Years ▾



Total US Dollars
24.92

Payments by Type

General Payments

Amount
\$9.15 Billion

Payments
38.2

Research Payments

Amount
\$14.74 Billion

Payments
2.50

Value of Ownership

Amount
\$1.03 Billion

Payments
3,64

Dollars for Docs

By Charles Ornstein, Lena Groeger, Mike Tigas, and Ryann Grochowski Jones, ProPublica. Updated December 13, 2016

Pharmaceutical and medical device companies are now required by law to release details of their payments to a variety of doctors and U.S. teaching hospitals for promotional talks, research and consulting, among other categories. Use this tool to search for general payments (excluding research and ownership interests) made from August 2013 to December 2015. | [Related Story: We've Updated Dollars for Docs. Here's What's New.](#) »

Has Your Doctor Received Drug or Device Company Money?

All States

For example: Andrew Jones, Boston, 10013

\$6.25B in disclosed payments **810,716** doctors **1,171** teaching hospitals **1,866** companies

Totals listed below account for all payments from August 2013 to December 2015.

Top 50 Companies

Click on a company to see how its payments break down by drug, device or doctor. Or, [see all companies](#) »

COMPANY	PAYMENTS
GENENTECH, INC.	\$727M
DEPUY SYNTHES PRODUCTS LLC	\$167M
STRYKER CORPORATION	\$153M
MEDTRONIC SOFAMOR DANEK USA, INC.	\$147M
ASTRAZENECA PHARMACEUTICALS LP	\$145M
PFIZER INC.	\$128M

Highest-Earning Doctors

NAME	PAYMENTS
ROGER JACKSON Orthopaedic Surgery of the Spine	\$54.1M
SUJATA NARAYAN Family Medicine	\$43.9M
STEPHEN BURKHART Orthopaedic Surgery	\$43.4M
KEVIN FOLEY Neurological Surgery	\$39.8M
KAREN UNDERWOOD Pediatric Critical Care Medicine	\$28.5M

About the Dollars for Docs Data

Details behind our drug company money database.

Download the Data

The entire data set is available for purchase in the [ProPublica Data Store](#).

Source

The Centers for Medicare and Medicaid Services [Open Payments](#) data.

Archive

Search for payments made by 17 drug companies between 2009 and 2013.

Patients, Take Action

We want to know how you've used or might use this information in your day to day lives. Have you talked to your doctor? Do you plan to? Tell us: propub.li/participate-d4d

Reporters, Use Our Data

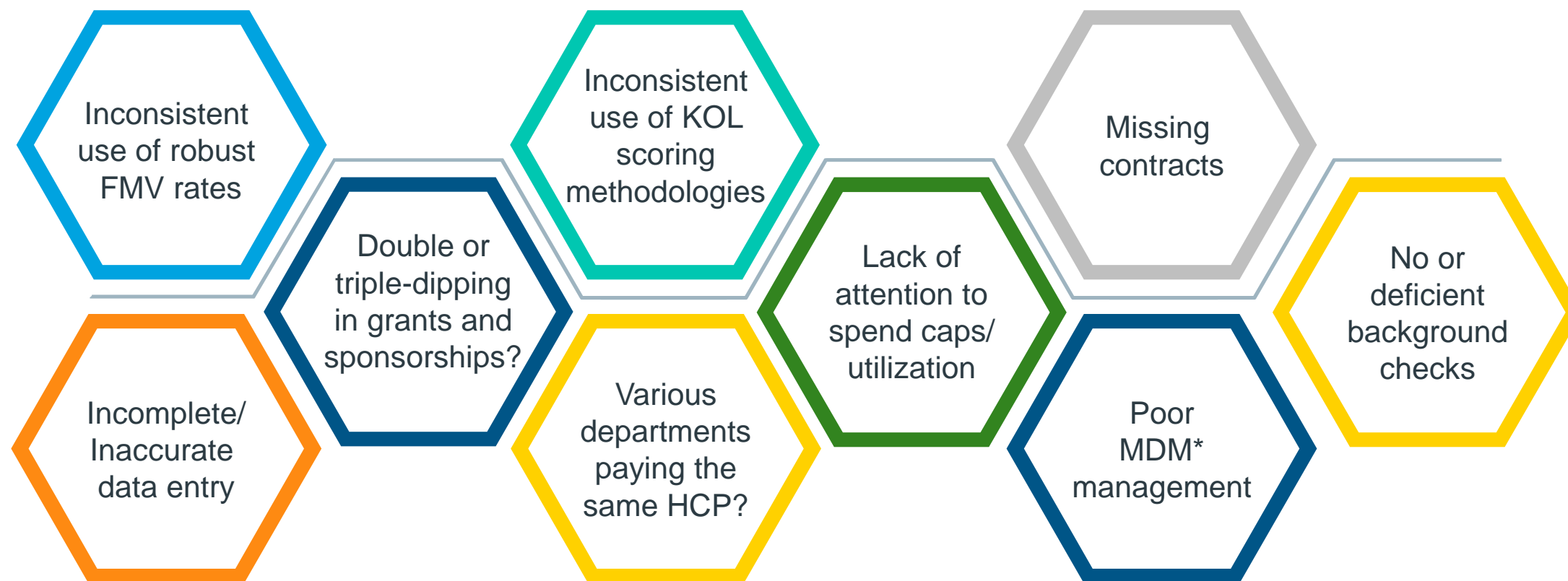
Have questions about how you can best use Dollars for Docs for your own localized reporting? Contact us at media@propublica.org.

Background Stories

Research Payments	Value of Ownership or Investment Interest
Amount \$379.01 Million*	Amount \$1.03 Billion
Amount \$2.94 Billion	Amount N/A**
Amount \$14.74 Billion	Amount \$1.03 Billion



Common Challenges Before Spend Is Aggregated Or A Report Is Created



What other challenges around transparency reporting are you concerned with?

The Solution: Early And Ongoing...Strengthen Business Processes And Automation Before The Money Is Spent



1. Review policies and SOPs for completeness and clarity
2. Ensure effective communications and understanding
3. Automate workflows that feed into aggregate spend
4. Support decision-making before an HCP or third party is contracted:
 - Provide historic spend information
 - Provide current year-to-date aggregate information
 - Look out for duplication
 - Ideally, look at contracting and spending globally and across all functions
 - Check for internal compliance business rules (caps, etc.)
5. Ensure contracts are clear, comprehensive and transparent, especially with third party vendors
6. Include automated FMV and KOL determination (cross border)

Opportunity to act as a partner to the business

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General Data Protection Regulation – GDPR

Directive 95/46/EC

Data protection directive with regard to the processing of personal data and on the free movement of such data - transposed to member state laws

REPLACED BY

GDPR

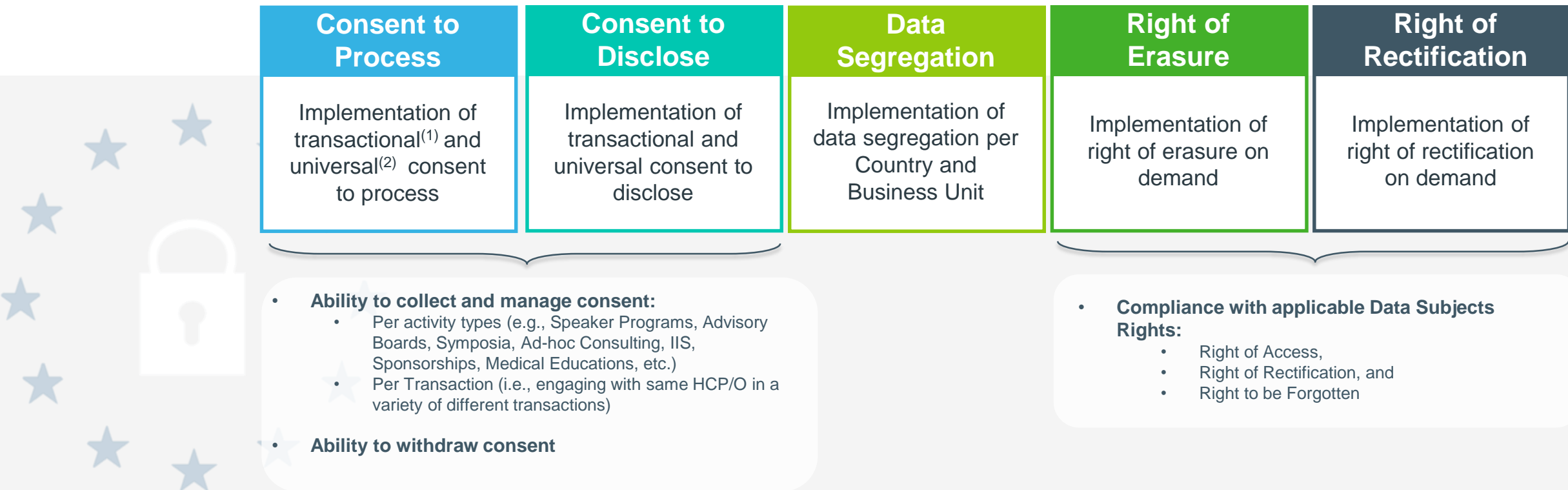
Regulation directly effective in member states without the need for implementing legislation.

Fully in force from May 25, 2018 in all EU countries



- Stronger rights for individuals
- Greater accountability requirements
- Increased scope
- **Strong sanctions and penalties for non-compliance: top fine is up to 4% worldwide group turnover**

GDPR – Key Requirements



Data Security

Implement technical and organizational security controls to protect personal data against accidental or unlawful destruction or loss, alteration, unauthorized disclosures or breach.

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Questions?





Thank You



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