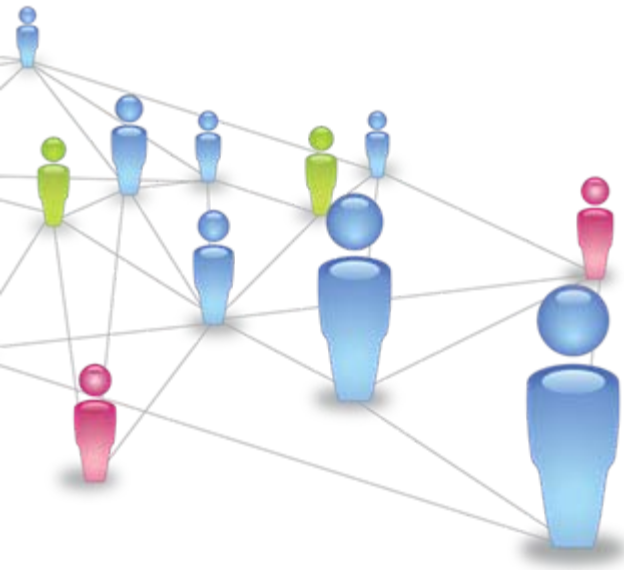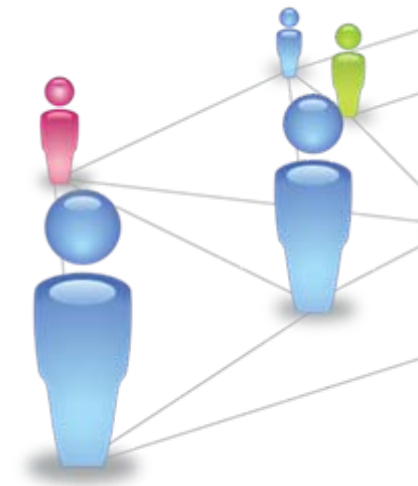# Advanced Issues in Global Transparency: Data Disclosure and Aggregate Spend Management

Dario GHODDOUSI
Senior Vice President
Global Transparency and MDM Solutions

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TRANSPARENCY CHALLENGES AND OPERATIONAL APPROACH

We see 6 main operational challenges for transparency reporting

→ **Spend Data Sources**
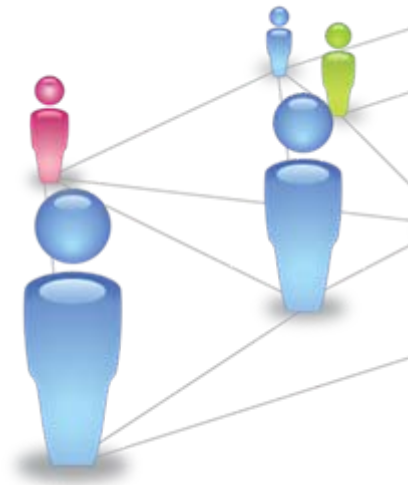
→ **Unique ID**

→ **Evolving Rules**

→ **Relationship with Data Subjects**

→ **Local vs Global Approach**

→ **Traceability**

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First Challenge

SPEND DATA SOURCES

Spend Data sits in various departments

Sales & Marketing
- Gifts, Meals,
- S&M Customer expenses, samples
- Fee for Service arrangements
- Advertising
- Patient education
- Conventions

R&D and Medical Affairs
- Clinical trials
- Fee for Service arrangements
- Medical Liaison Customer Expenses
- Medical Publications
- Medical Information

Corporate Affairs
- Charitable Contributions
- Advocacy
- Corporate Memberships
- Grants
- Sponsorships
- Fellowships

Third Party Vendor/Partners
- Market Research
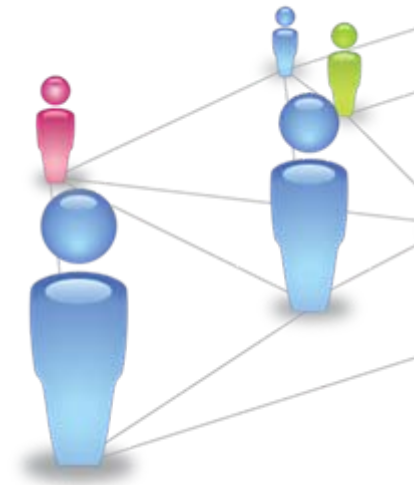- Vendor-managed Programs
- CME
- Clinical trials

Geographies

Products

Business Units

Customers

Vendors

- **Different ways** of reporting and capturing data

- **Different** IT systems

- Rapid architecture **changes** due to Mergers, Acquisition or Joint Ventures

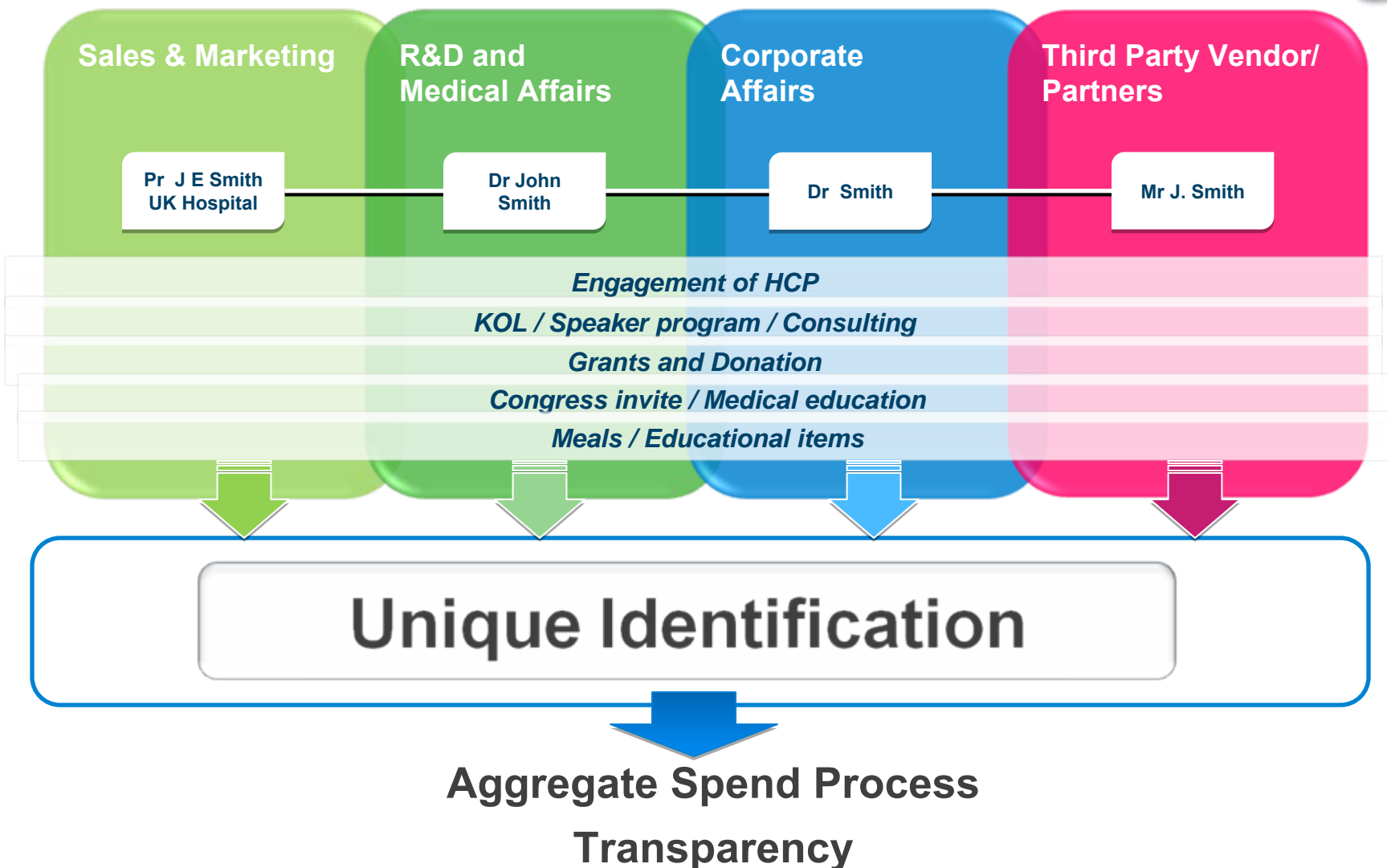- **Multiple** external vendors and partners (sales agents, market research companies, travel agencies…)

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Second Challenge

UNIQUE ID

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Unique ID for customers across the Enterprise

Sales & Marketing	R&D and Medical Affairs	Corporate Affairs	Third Party Vendor/ Partners
Pr J E Smith UK Hospital	Dr John Smith	Dr Smith	Mr J. Smith

Engagement of HCP

KOL / Speaker program / Consulting

Grants and Donation

Congress invite / Medical education

Meals / Educational items

Unique Identification

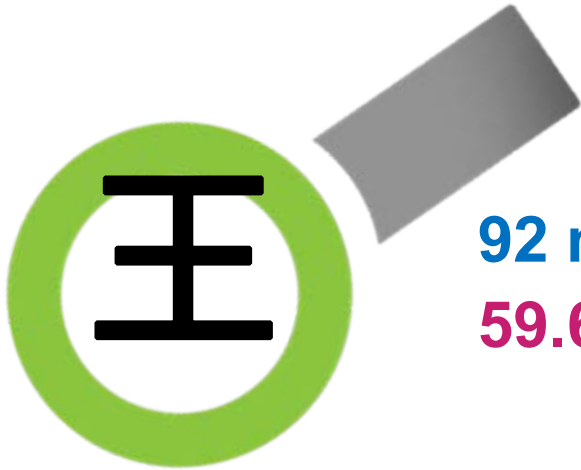## Aggregate Spend Process Transparency

王 **Wáng**

Challenge with Unique ID
Example in China

王

« Wáng»

92 million *« Wáng»* (**7.25%** of the population)
59.643 in OneKey China (HCPs)

王伟

« Wáng wěi »

4 million *« Wáng wěi »*
359 in OneKey China

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Third Challenge

EVOLVING RULES

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Evolution of Rules

2011
- Expenses Amount > 60€
- Contract Management

2012
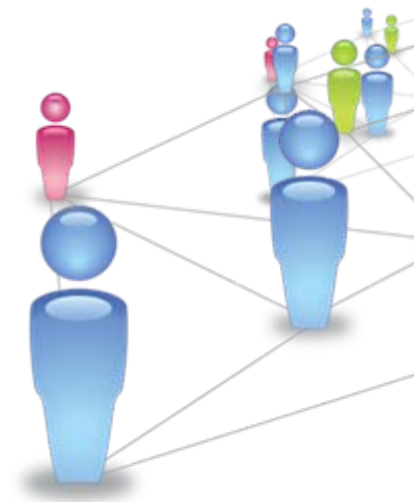- Expenses Amount per Ranges if total was <500€
- Contract Management List with amount

2014
- Expenses > 10€
- Contract List Management without amount

2015
→ *Additional changes expected with EPFIA adoption ?*

Fourth Challenge

RELATIONSHIP WITH DATA SUBJECTS

Relationship with Data Subjects

→ **HCPs are your main customers so there is the need to interact with them professionally and with courtesy**

→ **Data Privacy rules may apply**

→ **In some countries pre-disclosure to individual HCPs is required or best practice**

→ **HCPs may have the right to dispute**

→ **In some cases there is the need to collect the consent**

→ **In some geographies HCP consent already given can be revoked**

→ **and all this has to be done on large volume of HCPs with a large volume of spend trasactions**

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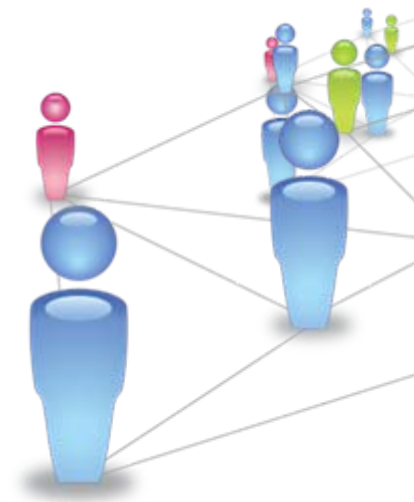
Fifth Challenge

LOCAL VS GLOBAL APPROACH

Global & Local Different Needs

→ Your Reporting solution must balance global and local needs

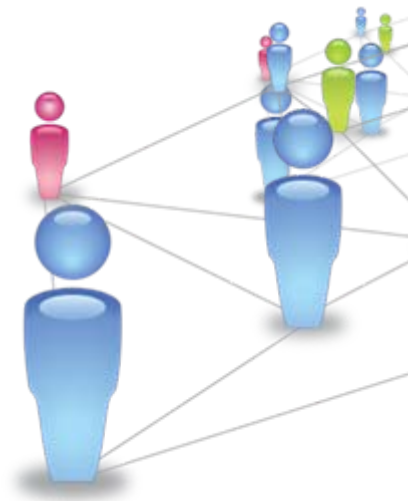| Global Needs	Local Needs
Economy of Scale	Healthcare Structure
Company Policies	Regulation
Process Standardization	Language & Culture
Common KPIs	Local Support

Cross Border

One Global System is making the reporting of Cross Border Spend very simple

Currency Challenge

→ **Spend is reported in different currencies**

→ **Currency conversion has to be done to report in one currency (the reporting currency)**

→ **Currency conversion has to be done with the rate at the date of the spend**

Sixth Challenge

TRACEABILITY

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All the reporting steps are subject to audit

→ **Spend data collection has to be auditable**

→ **Any data modification / amendment is subject to audit trail**

→ **Reporting submission approval workflow has to be traceable**

→ **Reporting methodology has to be documented**

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6 main operational challenges for transparency reporting

→ **Spend Data Sources**

→ **Unique ID**

→ **Evolving Rules**

→ **Relationship with Data Subjects**

→ **Local vs Global Approach**

→ **Traceability**

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We have solutions for the operational challenges for transparency reporting

AggregateSpend360™ → **Spend Data Sources**

OneKey Nucleus 360® → **Unique ID**

AggregateSpend360™ → **Evolving Rules**

AggregateSpend360™ → **Relationship with Data Subjects**

AggregateSpend360™
OneKey Nucleus 360® → **Local vs Global Approach**

AggregateSpend360™ → **Traceability**

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Thank You

Dario GHODDOUSI
dario.ghoddousi@cegedim.com