

National Disclosure Summit

In-Flight Aggregate Spend Data Monitoring Examples

February 6, 2014

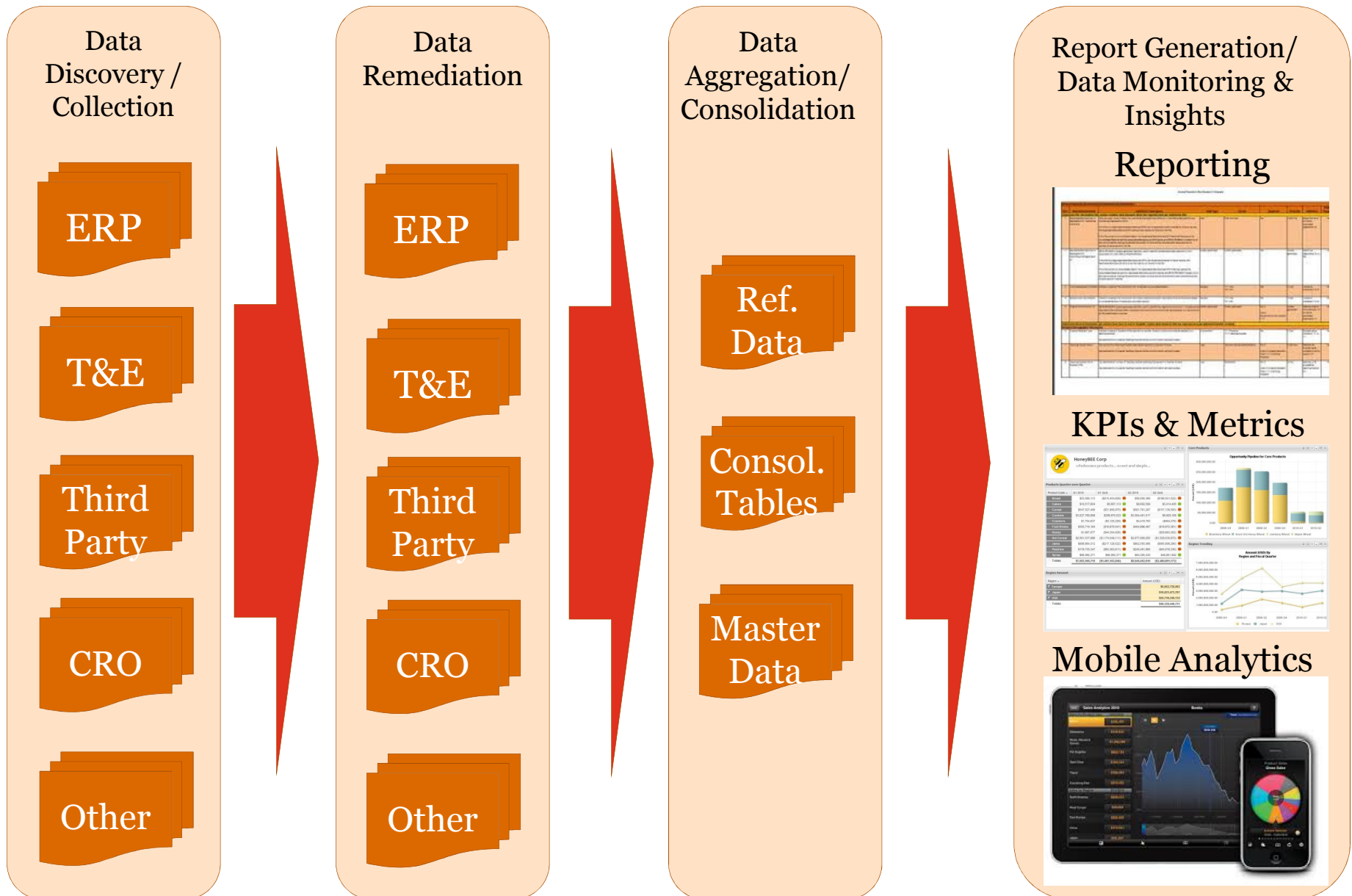
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PROGRAM OVERVIEW

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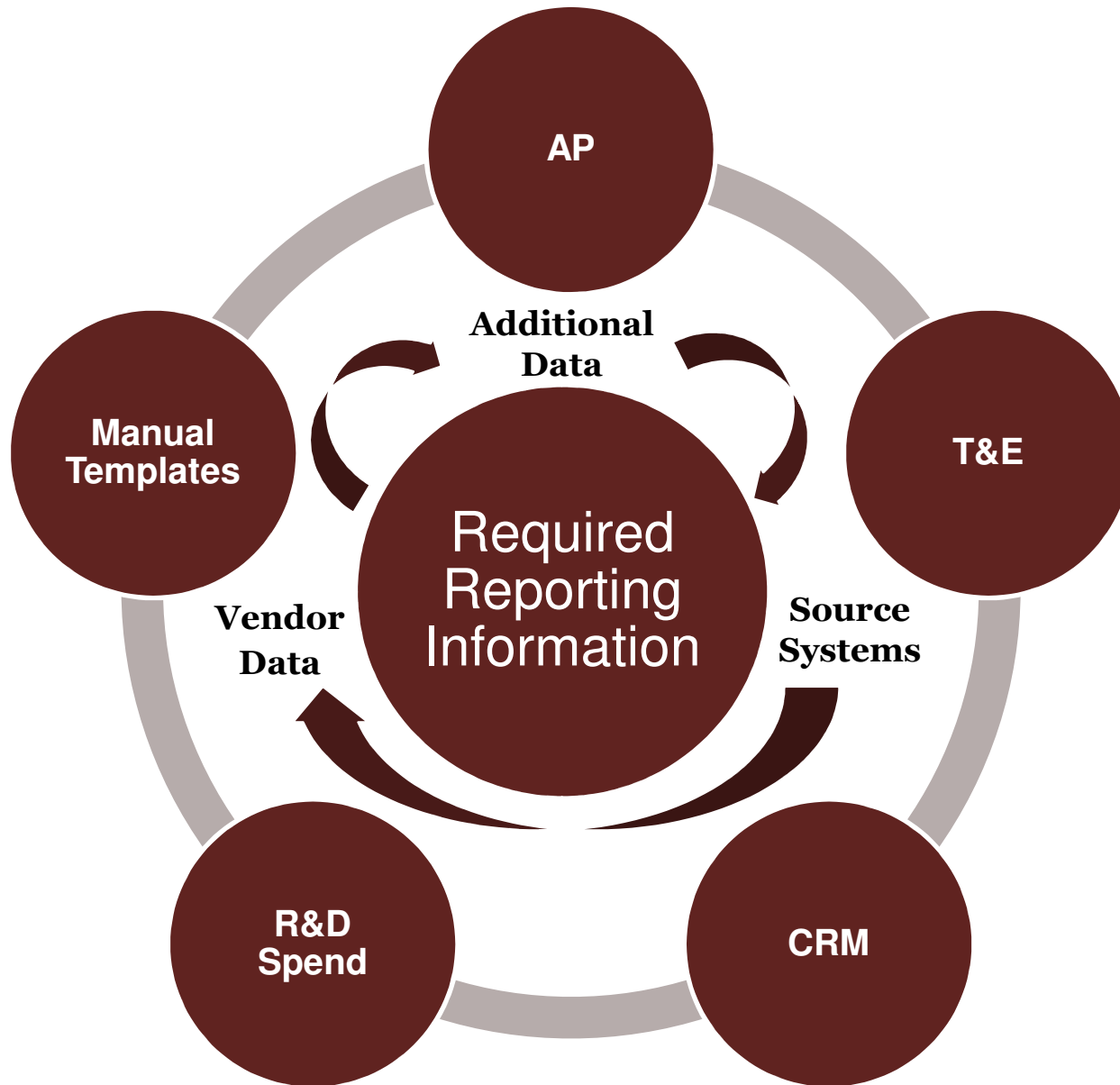
Overall Process / Data flow



DATA COLLECTION

2

Elements of Data Collection



Common Data Quality Issues

Source System Related Issues

Often missing or incorrectly identifying attendee types in Fee for Service and T&E transactions

- HCP attendee flagged as an Employee
- Support staff flagged as non business guests

AP transactions are not granular enough to provide meaningful information

- Header level payment records without granular detailed GL level data

Missing information required to accurately identify reportable activity and expense types

- Inaccurate GL or Cost Center code
- Activity type indicating Meal and actual payment is for Travel

Common Data Quality Issues

Vendor Related Quality Issues

Reliance on 3rd party to accurately and completely provide information required for reporting

- Activity data does not reconcile with payment information
- Missing obvious expenses (Speaker Program without Speaker Fees)

Other Quality Related Issues

Identifying transactions for specific divisions or business units

- Identifying data from countries such as Canada, Mexico which can easily utilize US HCPs
- Business units with different core products

Transactions often does not include beneficiary information

- Research payment beneficiary is different than vendor who actually got paid out of SAP
- Grant paid to an institution benefiting particular HCP

Better Practice Considerations

Internal Systems

- Approach to AP data
- Approaches for Expense data
- Considerations for other systems

Vendors

- Vendor Management
- Portals, Manual Spreadsheets, or direct integration with source systems
- Vendor streamlining and rationalization

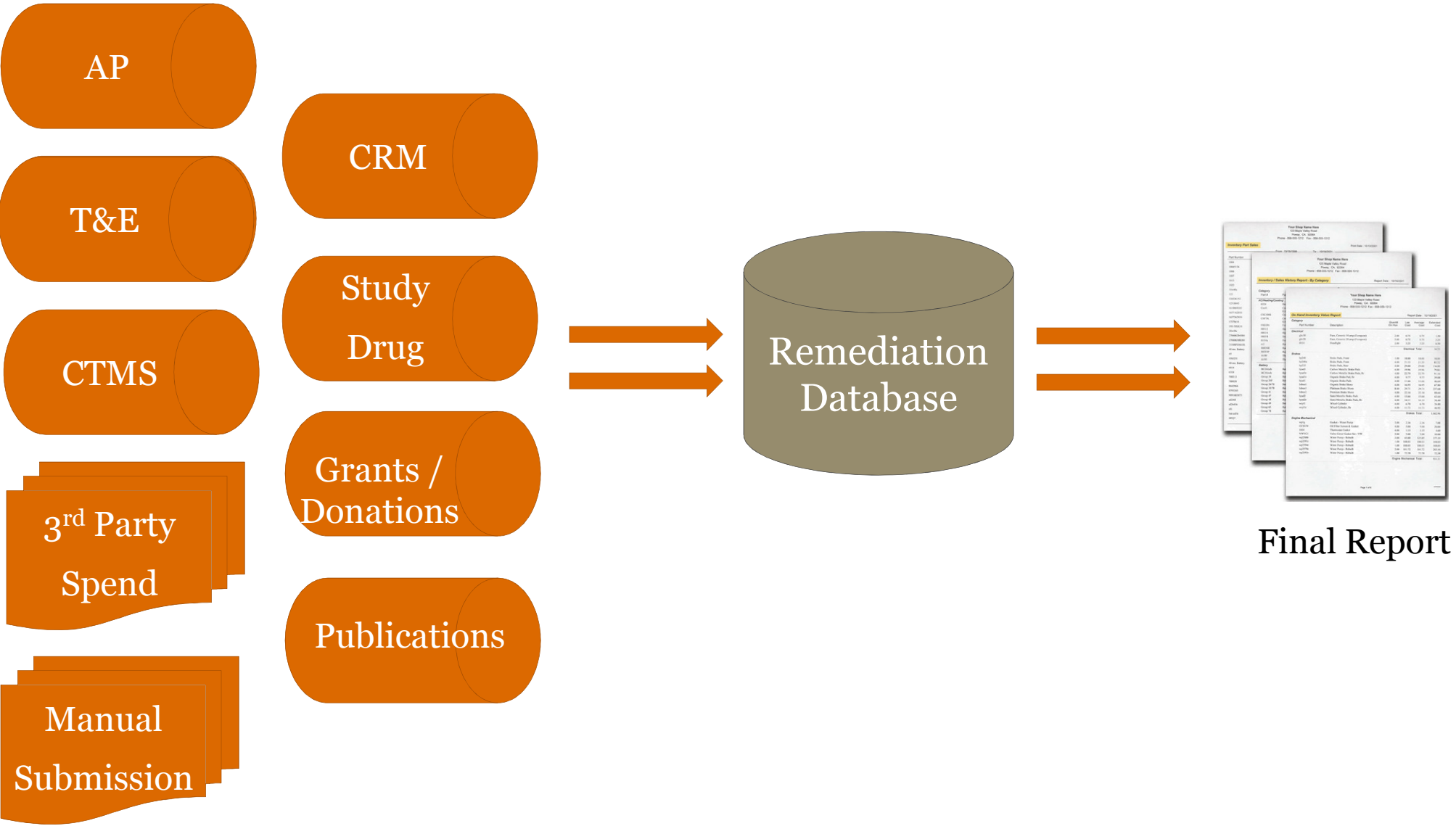
Additional Data Sources

- Development of a staging area for data consolidation and transformation from multiple sources

DATA REMEDIATION

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Data Remediation Process



Common Data Quality Issues

- AP
- Correctly identifying recipient from master data
- Incomplete or missing name and/or address
 - Subsidiary of reportable HCO
-
- Vague spend descriptions in supporting documents
- Supporting documents indicates high level activity (“Fees for Support Services”)
-
- Spend can not be broken down at a granular level - Different expense types within one spend activity)
- Multiple activities billed under one invoice

Common Data Quality Issues

Concur

Often missing or incorrectly identifying attendee types in Fee for Service and T&E transactions

- HCP attendee flagged as an Employee
- Support staff flagged as non business guests

3rd Party Spend

Reliance on manual template submissions to provide accurate and timely data for reporting

- Attributing spend to the incorrect recipient
- Missing information required for reporting
- Submission total does not represent initial payment made to third party entity

CTMS

System does not capture enough information to meet all reporting obligations

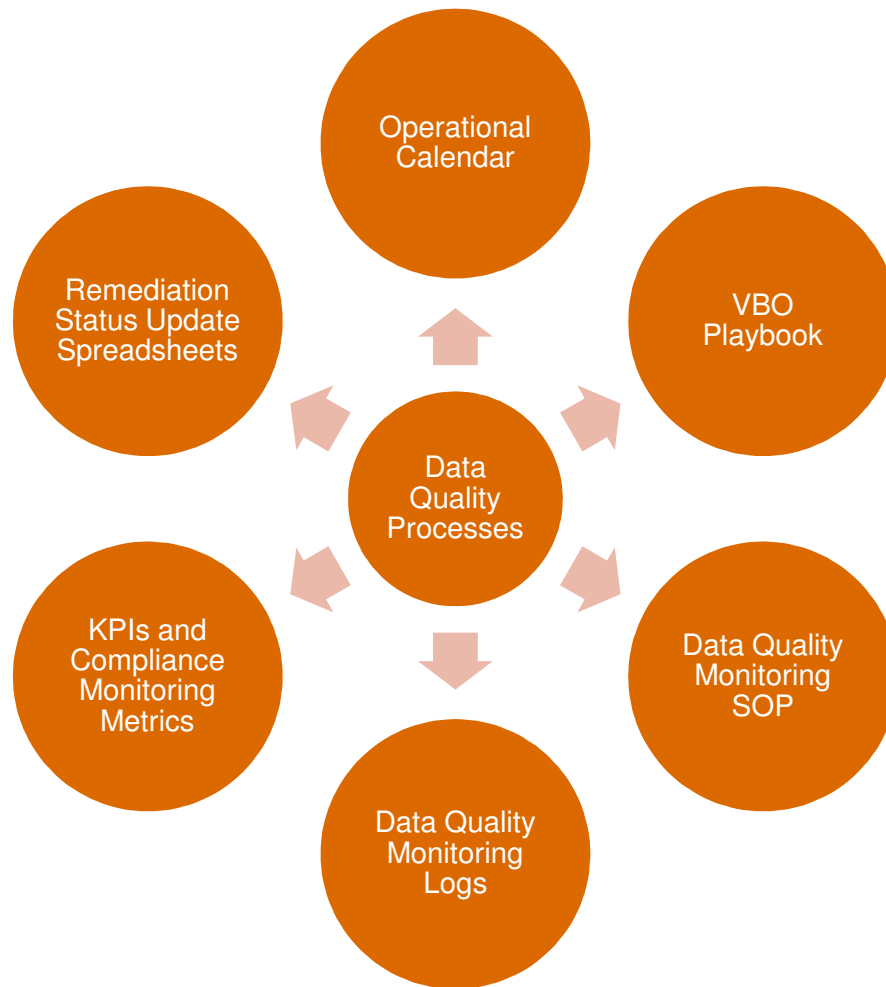
- Missing Principal Investigator information
- Site/recipient represented in CTMS does not align to entity name in SAP

Common Data Quality Issues

CRM

- Difficult to attribute individual price based on manufacturer's wholesale purchase
- Identifying true beneficiary based on reprint/leave behind request

Better Practice Considerations



Data Quality Monitoring SOP

The Data Quality Monitoring SOP describes the internal processes we have in place to conduct multiple reviews prior to sharing data with clients.

- The SOP specifically contains:
 - Relevant data sets to perform detailed data quality monitoring
 - The detailed steps needed to perform a VBO staff peer review
 - Error rate thresholds to determine corrective action
 - Steps to take for corrective action

Data Quality Monitoring Logs

The Data Quality Monitoring logs display all the items needed to complete a peer review of data remediation

- The data quality monitoring logs specifically contain:
 - QA date
 - Data Source
 - QA Peer Reviewer
 - QA Type
 - VBO Resource Name (original remediator)
 - Number of records reviewed
 - Number of records passed
 - Number of records failed
 - Error Rate
 - Resolution steps
 - Additional comments providing context to the review

Operational Excellence Metrics

The following are examples of the types of operational excellence metrics that we can measure on a quarterly and annual basis

Quarterly

- Total spend by payee (by expense type)
- % of transactions that fall in dollar intervals (\$0-\$100, \$100-\$200, etc.)
- % of total spend dollar value that fall into dollar intervals
- % and number of HCPs that fall into dollar intervals
- Total dollars spent per data source
- Number of speaker programs that have expenses when the program does not occur (by product)
- Number of HCPs that exceed the annual speaker program cap

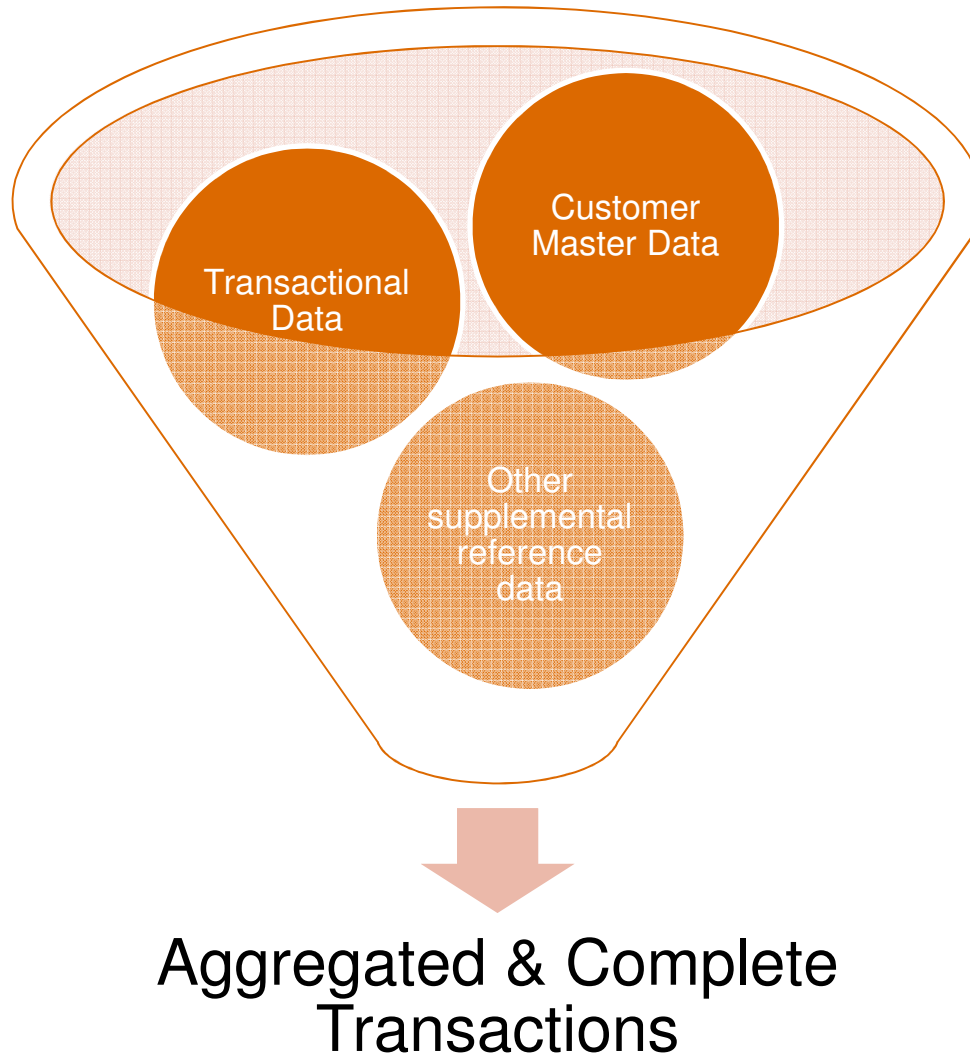
Annually

- Average travel costs per HCP (also categorized in Compliance Monitoring)
 - List of the top HCPs based on the outliers in the data
- Range of fee for service provided by specialty (by product)

DATA AGGREGATION

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Data Aggregation Components



Common Data Quality Issues

Data Aggregation: Data Quality

Nature and purpose from various source systems are not aligned with standard spend definitions

- Spend from T&E indicates “Field Services” which is hard to map it to standard categories
- Other types of PoTVs included in T&E systems (Meals during FFS arrangements, Travel arrangements)

Incorrect master data

- Missing or multiple identifiers for same HCP
- Address is missing or not in standard format
- Identifying hierarchy of HCP’s specialty
- Specialty and credentials are not aligned to Federal or State requirements

Better Practices

Transactional Data

- Profile and validate source data during data collection process
- Develop common definition framework that includes all business activities
- Expand common definition framework to include reporting requirements for each activity and expense types by jurisdictions
- Map source system's activity and expense types to common definition framework

Master Data

- Align each recipient with existing master data
- Expand common definition framework to include common HCP specialty and credentials
- Ensure each recipient is included in the master data set and enrich it using publicly available data sources

SUMMARY

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Summary

Improving data quality at the source this will:

- **Minimize your remediation efforts,**
- **Provide greater accuracy and completeness of reporting data, and**
- **All pre-disclosure and dispute resolution processes**



Questions?