
Developing an Effective Compliance Training Program for Pharmaceutical Sales Personnel

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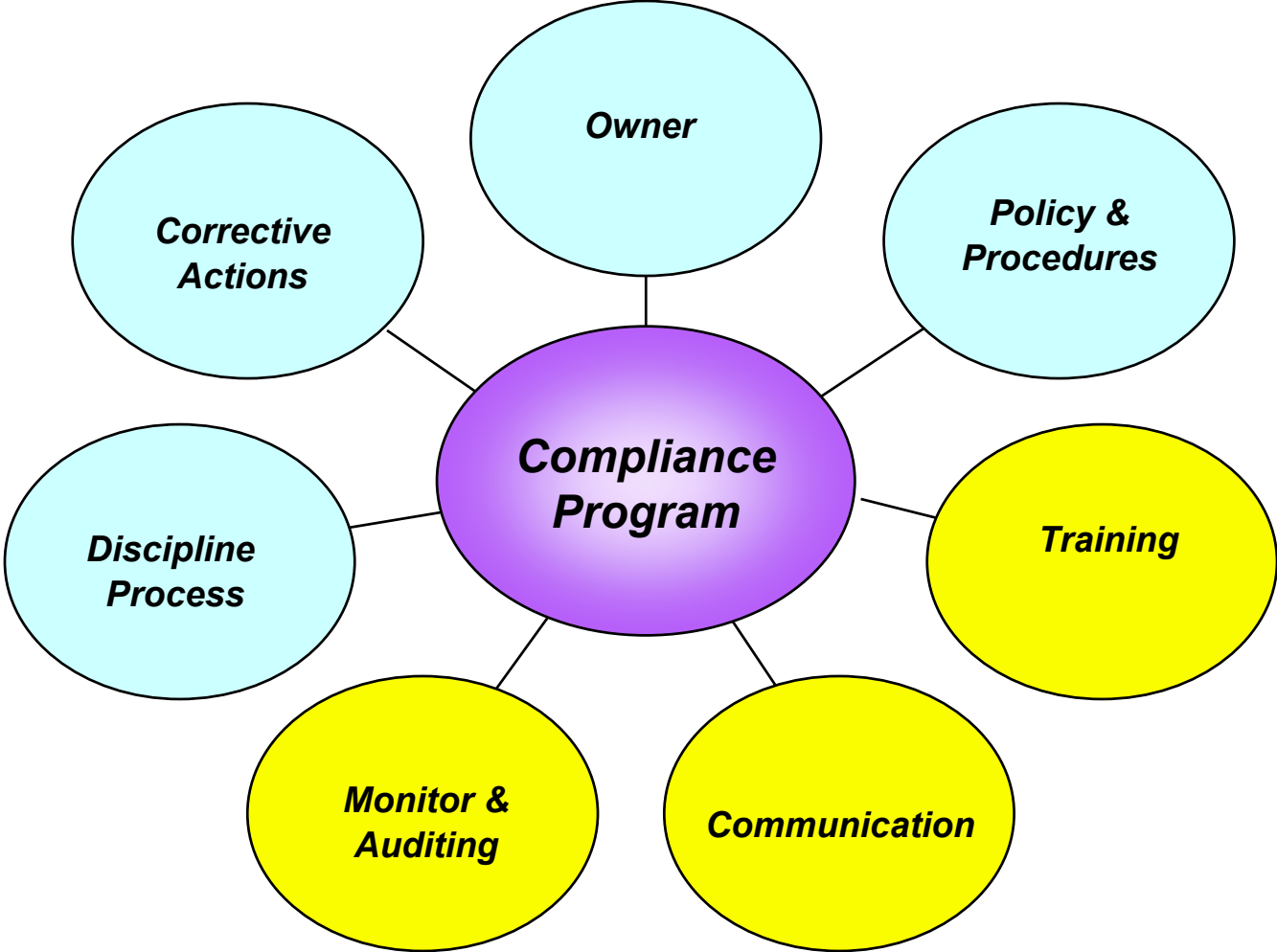
The Lilly logo is written in a red, cursive script font.

Answers That Matter.

Content Outline

- Seven Elements of a Compliance Program
- Compliance Training Development
- Compliance Training Delivery
- PhRMA Code Example
- Communication
- Monitoring and Assessment

Seven Elements of a Compliance Program



Compliance Training Development

Use adult learning principles

- Tell them
- Tell them why, WIFM
- Let them practice

Content development

- Include people with sales experience as well as compliance, legal and regulatory
- Translate policy and legal-ese to rep language
- Use Sales Trainers or Field Personnel to review and validate training
- When selecting - Off the shelf solutions - consider the learner

Testing

- Aligned to training objectives
- Validated tests



Compliance Training Delivery

Incorporate into existing sales training process

- New rep sales schools
- Ongoing training - sales meetings, self-study
 - Spread out over the year - not just one day once a year
- Tracking of completion

Presented by Directors, Managers and Trainers

- Creating a culture of compliance

Model appropriate responses to the toughest situations

- Practice - just like message practice
- Create realistic scenarios to assist with understanding

PhRMA Code Example

Issue:

Spouses or guests attending meals or presentations by a pharmaceutical company

Question:

Under the code may a Healthcare Professional's (HCP) spouse or other guest be included in a meal, if the HCP pays?

Answer:

No, A spouse or guest is not appropriate regardless of who pays unless they are an HCP for whom the information is appropriate.



Example of Sales Force Training

Inappropriate attendees



Spouses, family, or friends not practicing medicine in a field **relevant** to the information presented

Inappropriate guests must not attend Lilly business meals or FDA – Regulated programs

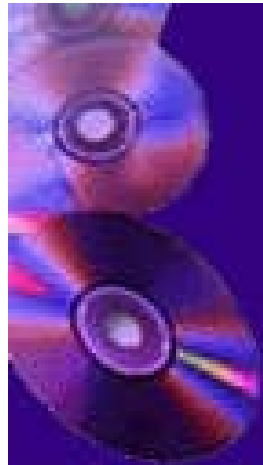
- Rep can prevent a situation before it happens by:
 - Discuss with HCP in advance
 - Refer to statement on invitation
 - Plan alternatives to evening programs (breakfast, lunch, immediately after office hours)
- Or you will have to ask inappropriate attendees to leave

PhRMA Code:

Q: “Under the code, may HCP’s spouse or other guest be included in a meal...if the HCP pays for the spouse or guest?”

A: “No. The code provides that it is not appropriate to include a spouse or guest at a meal...regardless of who pays for the meal, unless the spouse or guest would independently qualify as a HCP for whom the informational presentation is appropriate.”

Play DVD



Communication

Provide resources for questions and guidance

- 1-800 number to reach compliance team
- Intranet Database / Website
- E-mail
- Conference calls
- Field Compliance Experts: Field Managers, Trainers, Senior Reps

Create opportunities for dialogue

- Attend live training at meetings
 - Stay for breaks and meals
- Attend Sales school
- Routinely schedule Ride with Reps



Monitoring and Assessment

Develop a monitoring plan to assess effectiveness of training and assure compliance with policy

- Rep ride-alongs
- Speaker Programs
- Sales Meetings
- Area/District reviews
- Exhibits



Feedback loop

- Make adjustments in policy or training for clarity and consistency

Take corrective actions as necessary

Questions

