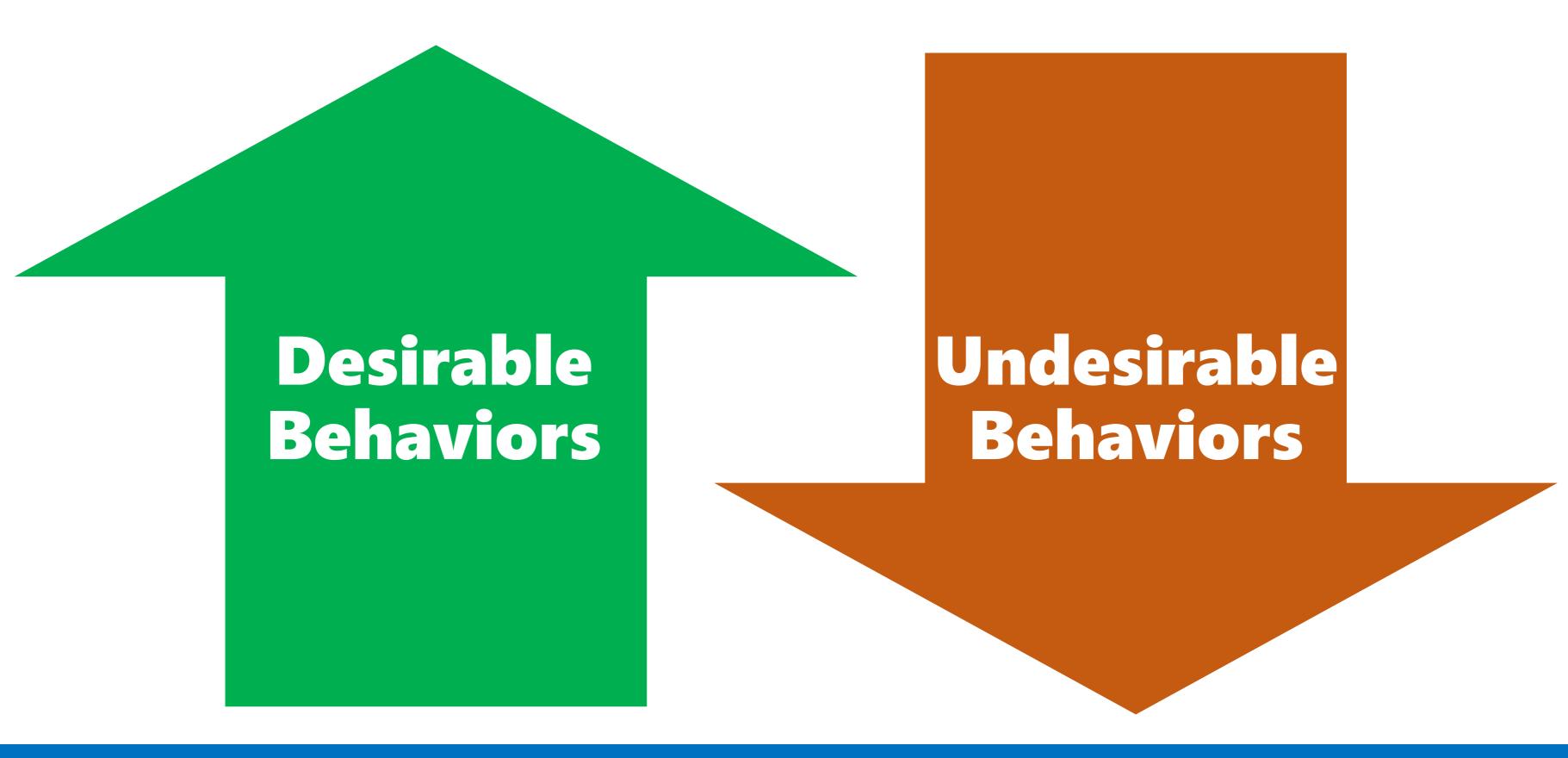
Reduce Compliance Risk Using a Portfolio Approach to Training

Erica Powers | Sage Therapeutics
Punkaj Amin | Smith & Nephew
Ed Sleeper | Celgene Corporation
Dan O'Connor | PharmaCertify™/NXLevel Solutions



What is the purpose of Compliance Training?







What are some of the behaviors you are looking to influence?



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What enables behavior? Fogg Behavior Model



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Fogg Behavior Model



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How do you increase ABILITY?

- Training
- Reference tools
- Simplification



What training modalities does your company employ?



TRAINING Modalities

- Foundational eLearning
- Reinforcement eLearning (microlearning)
- Live (in-person or virtual)
- Read & Sign
- Online reference
- App
- Quick reference materials
- Coaching and feedback





MOTIVATION Factors

- Pleasure/pain
- Hope
- Fear
- Social acceptance
- Social rejection





What motivators in your company help drive compliant behaviors?



Types of PROMPTS

- Contextual reminders, e.g. vis aids/sales materials
- Static prompts
 - Intranet banners
 - Posters
- Active prompts
 - Emails
 - Desk drops
 - Sales meetings





What prompts do you employ to trigger good behaviors?



Activity: Applying the Fogg Behavior Model

- Working in small groups...
- 5 minutes...
- Choose a behavior that you would like to influence
- Brainstorm and develop approaches to address all three factors
- Be ready to discuss your thoughts





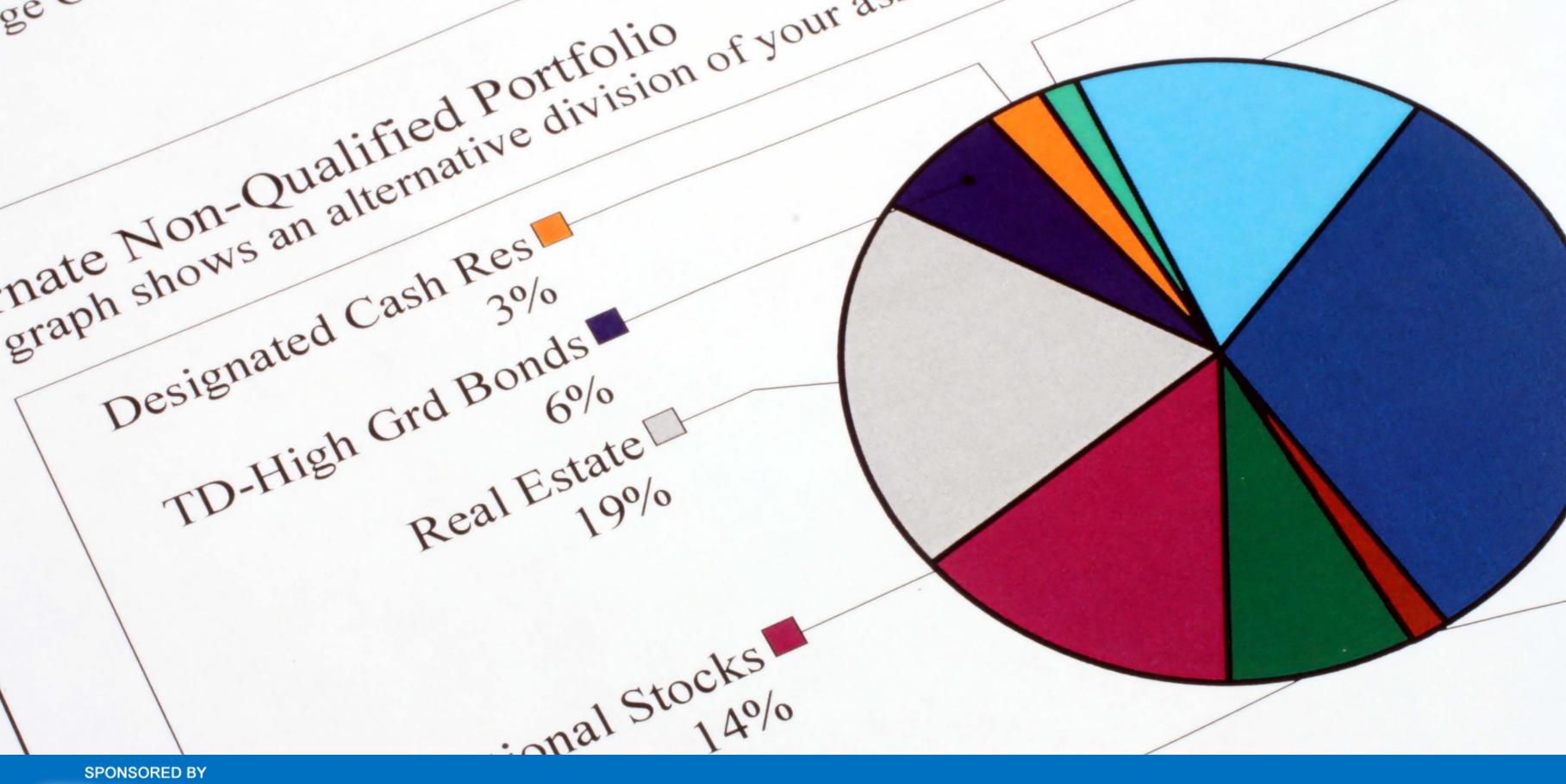
Agenda





What is a Portfolio Approach?

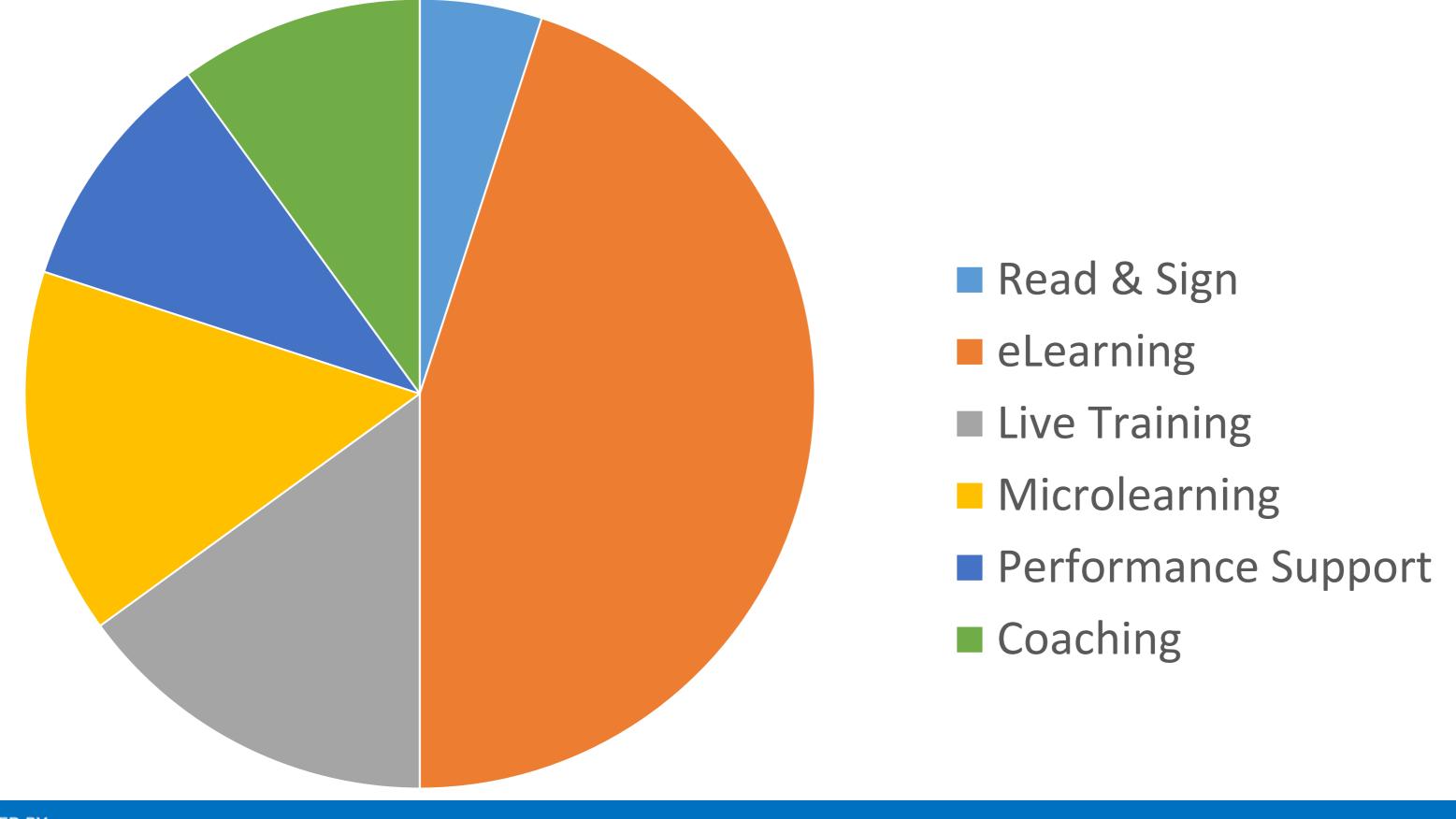








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What does DOJ say about training??

- Risk-based
- Gap analysis
- Timely
- Periodic
- Tailored
- Real-world, including "coverage of incidents"
- Evaluated/measured
- Tested and remediated

U.S. Department of Justice



U.S. Department of Justice Criminal Division

Evaluation of Corporate Compliance Programs

Guidance Document Updated: April 2019



How do you determine training priorities?



Factors for Determining Training Priorities

- Risk Levels
- •Shifting regulatory environment
- Frequency of activity
- Complexity of activity

- •Who are we training? (roles, experience, etc.)
- Compliance controls in place
- Budget and resourcing



Risk and Training Modalities

RISK RATING	TRAINING MODALITIES							
	Read & Sign	Foundational eLearning	Live Training	Helpline/ Coaching	Reinforcement eLearning	Job Aids	Online Reference	
CRITICAL								
HIGH								
MEDIUM								
LOW								



Example: Sales Position Risk

RESPONSIBILITIES

Develops business plan for assigned territory that is consistent with sales plans, strategies and objectives.

Conducts quality sales presentations to all targeted customers.

Understands and demonstrates targeting principles.

Leverages sample programs, literature and other items to ensure physician awareness of products.

Differentiates products from all competitors and responds to customer issues confidentially and appropriately.



Example: Sales Position Risk

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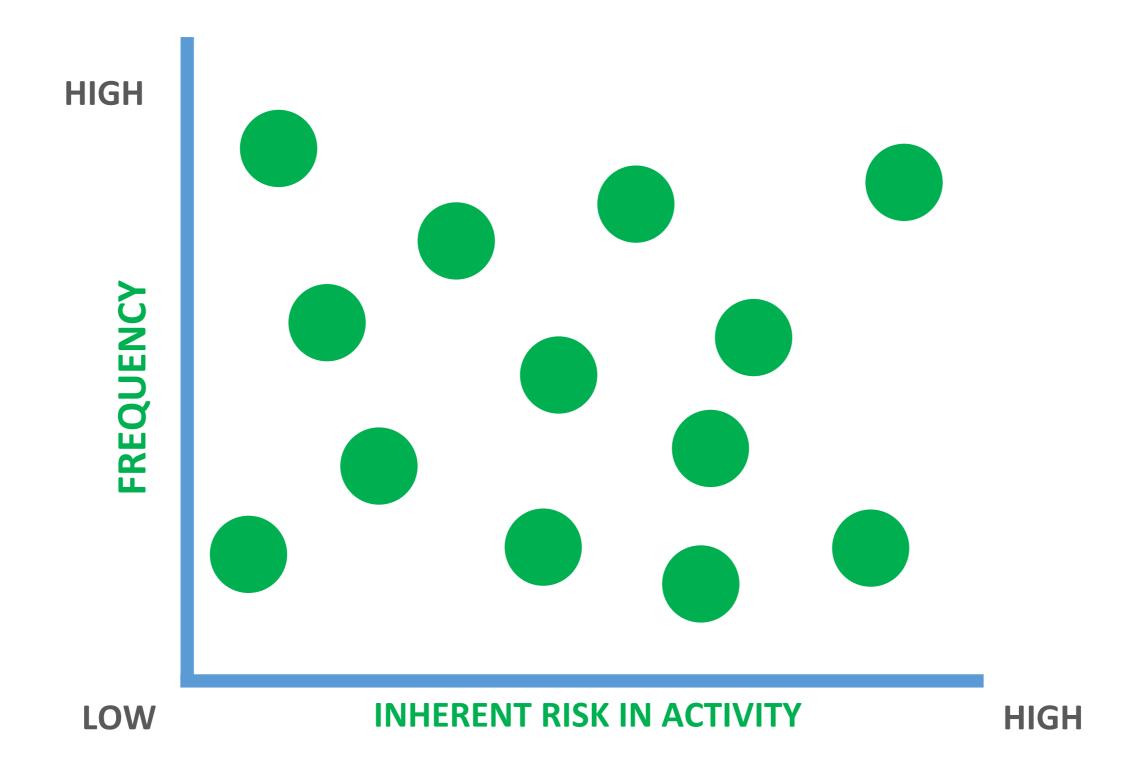
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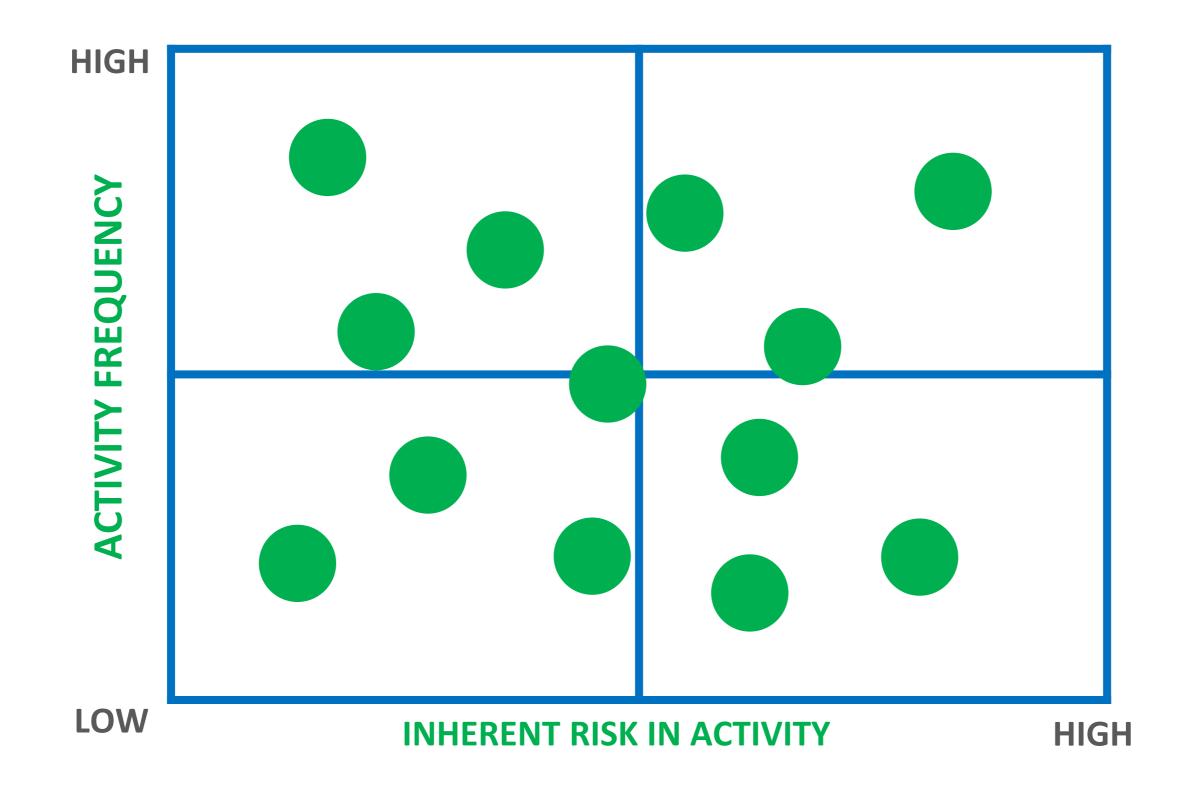
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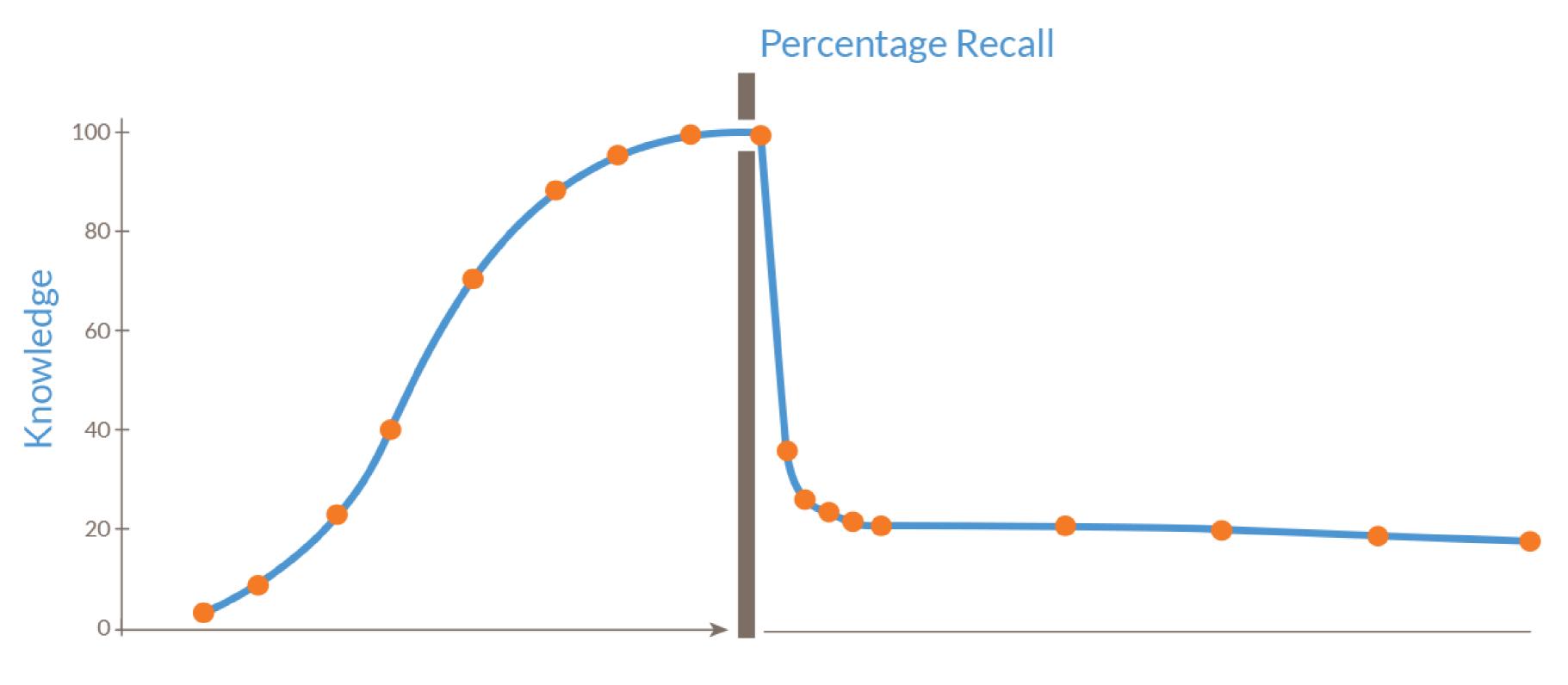


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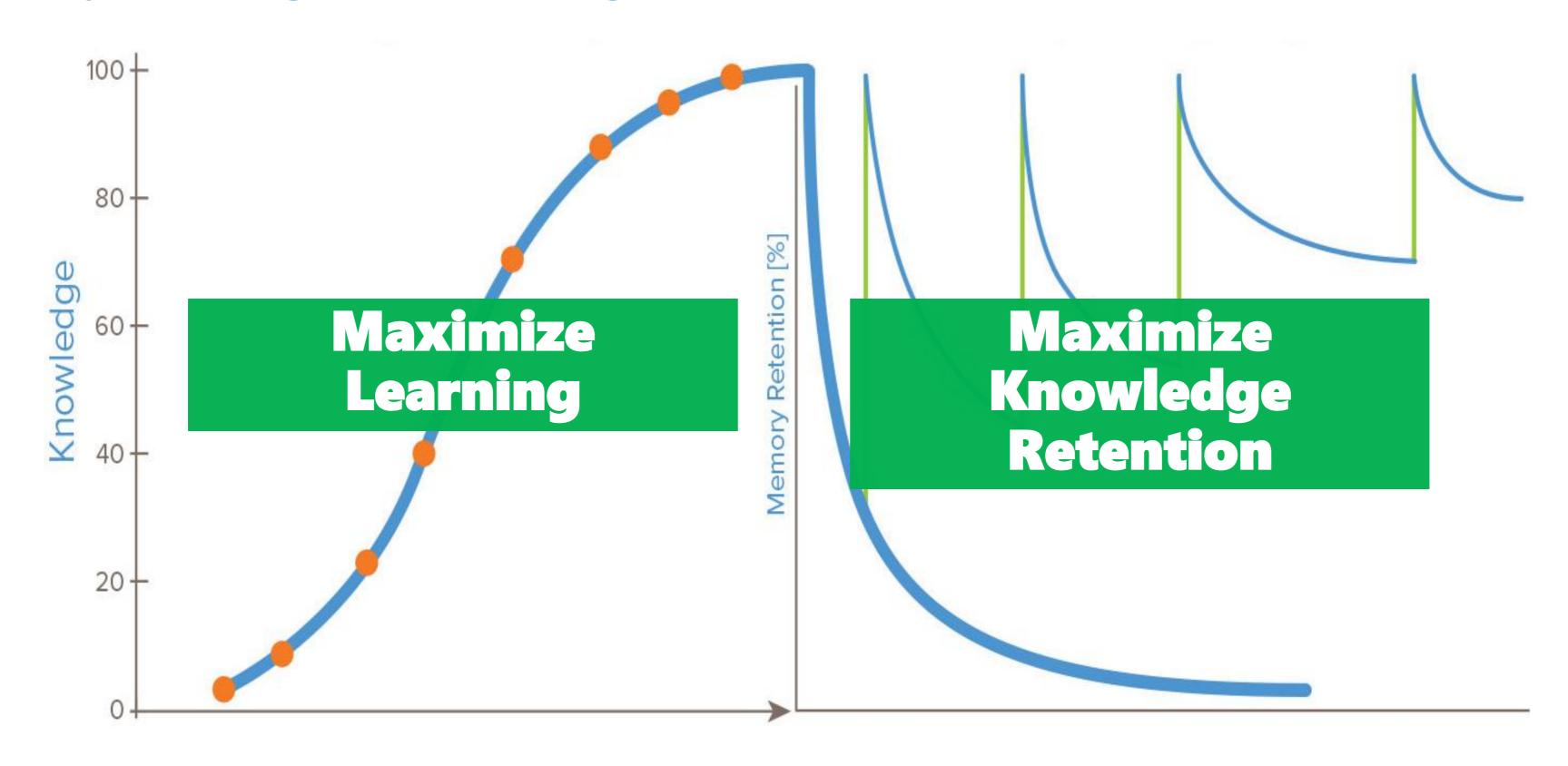
REQUENCY

•	Read & sign Coaching Foundational eLearning Online reference Helpline	 Read & sign Foundational eLearning Job aids Online reference Live training Coaching
	Read & Sign Coaching Job Aids Online reference Helpline	 Read & Sign Foundational eLearning Reinforcement eLearning Job Aids Online reference Live training Coaching

The Knowledge Retention Challenge



Improving Knowledge Retention



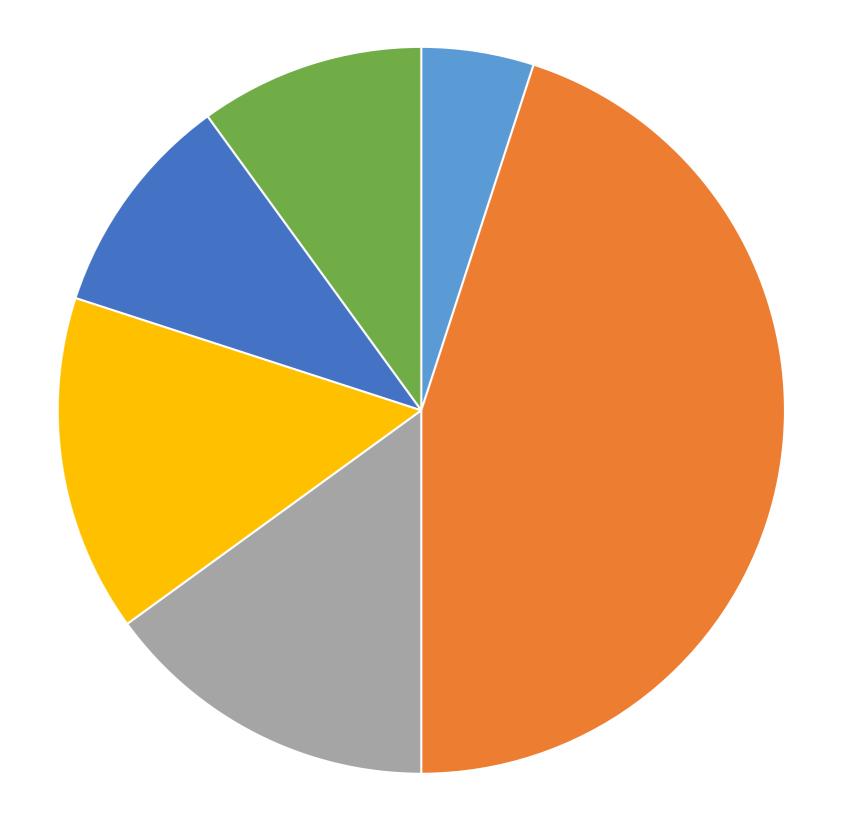
How are you increasing knowledge retention in your company?

Agenda





How you are implementing a Portfolio Approach in your company?





How are you measuring effectiveness of your training?



The Kirkpatrick Model

REACTION LEARNING **BEHAVIOR** RESULTS CHANGE



The Kirkpatrick Model

Surveys

Direct
feedback

Focus groups

Testing Monitoring

Compliance Metrics

Business

Metrics

Monitoring
Auditing
Helpline

THE PHARMACEUTICAL COMPLIANCE

What are your KEY TAKEAWAYS from this session?



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