

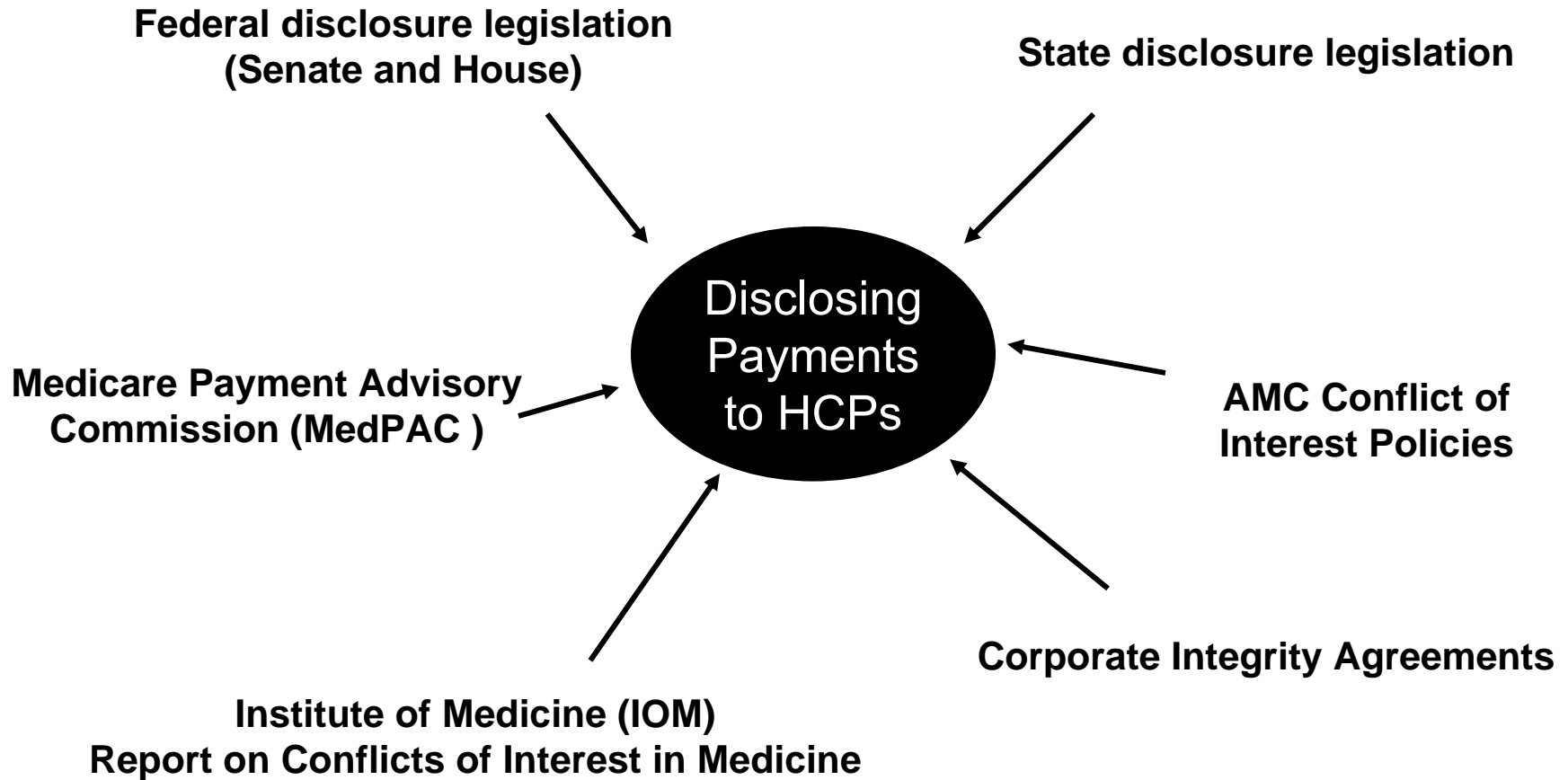
# **Healthcare Professional Payment Disclosure and Potential Industry Impact**

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Any opinions presented by the speaker are her own, and do not necessarily represent an official position of Pfizer Inc.

# Transparency

## *Evolving External Landscape*



# A Number of Pharmaceutical Companies Have Played a Leadership Role in Promoting Transparency



## Pfizer's transparency efforts have included:

- Public reporting of U.S. political contributions (2002)
- Registering trials on [clinicaltrials.gov](http://clinicaltrials.gov) (2002)
- Public posting of clinical trial results on [clinicalstudyresults.org](http://clinicalstudyresults.org) (2004)
- Disclosure of drug development pipeline on [Pfizer.com](http://Pfizer.com) (2006)
- Reporting of FDA post-marketing commitments on [Pfizer.com](http://Pfizer.com) (2007)
- Reporting of non-clinical healthcare related grants & charitable contributions on [Pfizer.com](http://Pfizer.com) (2008)
- Launch of unbranded Medicine Safety website (2008)
- Announcement of HCP Payment Disclosure Initiative (2009)

# Guiding Principles for Pfizer Voluntary HCP Payment Disclosure Initiative



- **Focus on patient needs**
  - Desire to better understand their information needs with regard to Pfizer's interactions with healthcare professionals
- **Demonstrate respect for healthcare professional collaborations**
  - Explain the value of collaborations
  - Consider and address HCP concerns as appropriate
- **Do all we can to ensure that the public at large understands the work we do with HCPs.**
  - Develop a reader friendly disclosure system that provides context and explains the purpose of our collaborations
  - Provide accurate and timely information to all.

# In February 2009, Pfizer Announced Its Voluntary HCP Payment Disclosure Initiative



Starting in March 2010, Pfizer will disclose payments to:

- All healthcare professionals who can prescribe medicines (includes physicians, NPs, PAs)
- Major institutions for ongoing clinical trials begun before July 1, 2009
- All principal investigators and other entities for Phase I-IV clinical trials sponsored by Pfizer beginning on or after July 1, 2009

Pfizer will disclose payments for:

- Consulting
- Promotional speaking
- Phase I-IV clinical trials
- Investigator-initiated research
- Meals and business-related travel

# Pfizer HCP Payment Disclosure Subsequently Included in CIA With Additional Requirements



- **Reporting Thresholds & De Minimus Items**
  - In March 2010 posting, payments to individuals will be posted if recipient received  $\geq$ \$500 in aggregate during 2009 from date tracking began
    - **\$500 Threshold eliminated per CIA starting with March 2011 posting**
  - In March 2010 posting, the value of meals or business-related travel expenses under \$25 will not be included in a recipient's aggregate total toward \$500.
    - **\$25 de minimus eliminated per CIA starting with March 2011 posting**
- **Timing and Frequency**
  - Annual disclosure on Pfizer.com starting on March 31, 2010 for payments made on or after July 1, 2009
    - **Per CIA, quarterly posting of data starting in June 2011**
- **Additional Disclosure Elements**
  - Educational Items (e.g., textbook, anatomical models)
    - **Disclosure required per CIA**

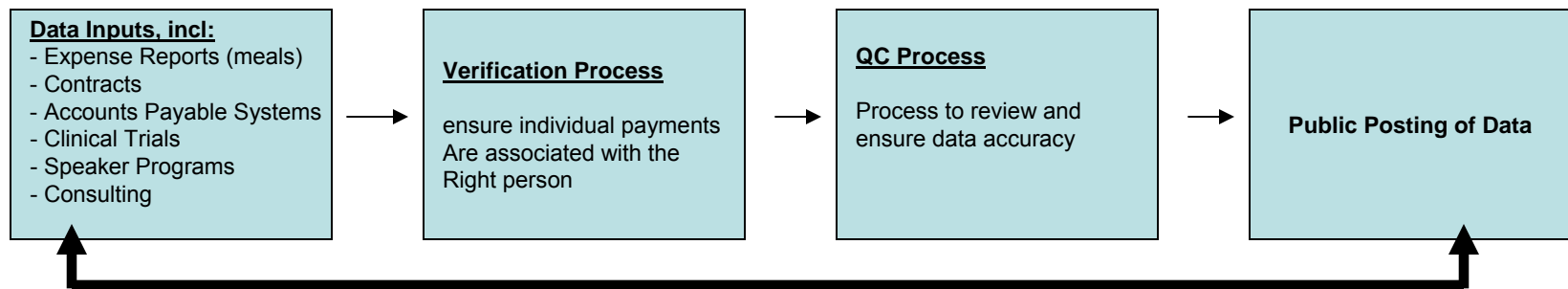
# Impact of HCP Payment Disclosure



## Operational Considerations

- **HCP spend is required to be captured across various systems and divisions**
  - Not a simple scale up of state law reporting processes
  - Need for more automated data collection and validation processes
- **Appropriate data collection processes and habits need to be established in every department that is involved in any way with HCP related spend**
  - Need for rollout of policies and training across the organization
- **Data collection challenges with respect to CSOs and vendors**
  - Contractual obligations and business rules
  - Data systems may not feed automatically
- **Need for Data Accuracy**
  - Robust quality control and audit processes
  - Consider need for feedback loop (eg, call center, mailbox) to enable physicians to followup with company on questions regarding posted data

### One Approach



Feedback Loop



### Based on Preliminary Research/Feedback-

- **Speakers and Consultants**

- Most physicians that were surveyed or that provided feedback support or are neutral to publicly posting compensation for services
- A small percentage of physicians have expressed concern indicated they will not collaborate with industry because of this issue
- The primary concern raised by physicians is about how their patients would view them in light of their collaborations with industry
- Many discussed the need to educate the public about the value of these collaborations

- **Clinical Trial Investigators**

- Most investigators surveyed did not anticipate disclosure impacting willingness to be an investigator
- Concern by investigators that posted clinical trial payments will be misconstrued as remuneration to the investigator

- **Consumers**
  - Preliminary feedback suggests there is not a clear understanding about transparency and the nature of paid collaborations with healthcare professionals
- **Medical Societies**
  - Several stakeholders have expressed an interest in helping their members prepare to address patient concerns regarding disclosure
- **Academic Medical Centers**
  - Requests to review payments to ensure AMC policies are being complied with

# Impact of HCP Payment Disclosure

## *Reputational Impact*



- **Increasing Public Disclosure of Business Practices**
  - to address public concerns
  - help manage perceived conflicts of interest
  - meet external requirements
- **Will transparency increase public trust in the industry?**
- **Will transparency bring further criticism of industry practices?**