Deloitte.

Global transparency solution.

The deadline for pharmaceutical companies to begin capturing data for the European Federation of Pharmaceutical Manufacturers (EFPIA) Disclosure Code is January 1, 2015. To help the industry both meet this objective and fill a need in the marketplace, Deloitte has developed a Healthcare Professional (HCP) Global Transparency Solution (GTS) which combines pre-build technology assets (data repository, portal, operational reports) with consulting services, to quickly enable a **highly scalable** platform with rich **data quality** management capabilities, to accelerate capability deployment and reduce the risk of inaccurate and incomplete HCP Spend publication.

Increasing global regulations

HCP Transparency regulations are rapidly expanding across the globe. By 2015, **70% of pharmaceutical sales** will occur in countries which have HCP Transparency regulations, shown in Figure 1 below.

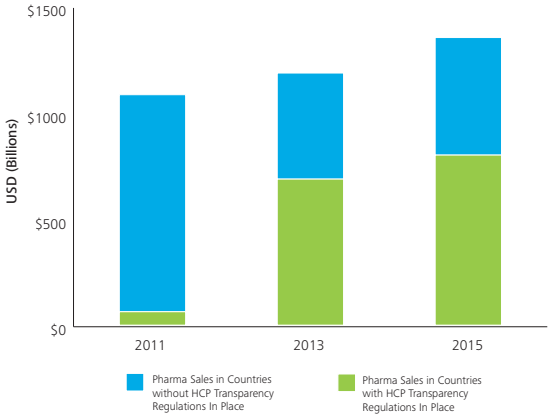

Figure 1: Pharmaceutical Sales in Countries with and without HCP Transparency Regulations

Source: Deloitte 2014 Global HCP Transparency Study www.deloitte.com/us/2012globalHCPstudy

Consistent data requirements

HCP Transparency data requirements vary slightly across the globe—some countries require details on contracts (e.g., France), others require details on R&D payments (e.g., U.S.)—but there is a consistent set of data elements which are required across many countries and jurisdictions.

Global centralized solution

The common data requirements and the knowledge that a large portion of HCP spend data resides in enterprise systems (ERP, T&E) leads us to conclude that some, but not all, capabilities for Global HCP Transparency reporting should be centralized. This was confirmed in a Benchmark Study Deloitte complete which included the CCO or Global Compliance Lead at 12 leading Life Sciences companies.[1]

[1]Deloitte 2014 Global HCP Transparency Study www.deloitte.com/us/2012globalHCPstudy

Technical and business challenge

Many systems where HCP Transparency data resides—ERP, T&E, and meeting management—are not designed for HCP Transparency data collection.

These source systems can be augmented to collect additional data, but corrections to data required for HCP Transparency typically cannot be managed in these source systems after a transaction is posted (e.g., a T&E report is submitted, a vendor paid, etc.). This creates the need for a spend transaction repository (separate from a reporting database) where data can be aggregated, analyzed and corrected.

Small Life Sciences organizations can often rely on hosted aggregate spend solution providers for data aggregation, corrections and reporting.

In large and medium sized Life Sciences organizations, relying on a hosted 3rd Party aggregate spend solution only may be problematic. Examples where hosted 3rd Party solutions may have trouble are:

- Event data is often collected from multiple systems, i.e., spend information from one system and attendee information from another system
- R&D spend transactions records require data from multiple systems, i.e., trial identifier from a Clinical Trials Management system and payment data from an ERP system
- Operational reports should include source system identifiers (PO numbers, meeting IDs, etc.) in order to effectively monitor data quality. Third-party hosted solutions may add cost and delay in adding/maintaining internal identifier information. This challenge is compounded when the company has multiple legal entities and business partners across the globe; each requiring different internal identifiers.

Deloitte designed GTS based on extensive project experience, in-depth conversations with HCP program leaders at leading Life Sciences companies and several formal benchmarking activities:

GTS technical solution

The GTS technical solution consists of a data repository, a portal, and operational reports (shaded green in Figure 4 below).

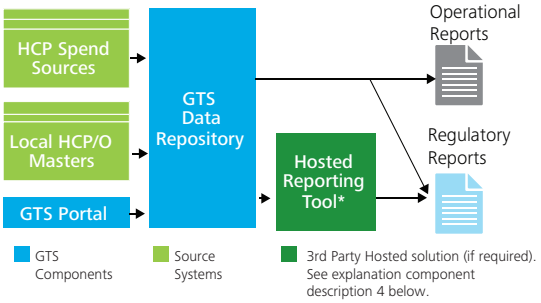

Figure 4: Global Transparency Solution (GTS) Components

Specific components of the GTS technical solution include:

1. **Data standards**—based on Global HCP Transparency reporting requirements; defines the interface between source systems and the GTS Data Repository; can eliminate point-to-point integrations improving scalability and reducing maintenance costs.
2. **Operational reports**—used to monitor data quality and compliance with policies including spend caps; provides business insights to health care professionals/organizations (HCP/O) spend data; and allows integration with other enterprise data. This capability can improve data quality and enable proactive compliance controls and monitoring.
3. **Ad-hoc entry and data corrections portal**—used to load ad-hoc and low volume data, make corrections to existing data, and make updates to HCP/O master data in small countries. The portal will includes a full audit trail of changes.
4. **Interface to 3rd Party hosted reporting tool**—External HCP Transparency vendors monitor HCP Transparency regulations and provide up-to-date regulatory reports. GTS can export data to a staging area, where it can be consumed by an external reporting tool. Some Life Sciences companies have opted to develop global regulatory reports using internal tools (extensions to GTS) instead of using a hosted 3rd Party system. We believe both options (using a 3rd party reporting solution and leveraging in-house tools) should be considered.
5. **Integration with HCP/O master data management solutions**—Based on our experience in Global HCP Transparency solutions, we believe HCP/O Master data can and should be managed in local systems by local affiliate resources. The local HCP master data is copied to GTS and linkage is established with enterprise solutions (e.g., ERP Vendor Master). This approach reinforces appropriate accountabilities—the local affiliate is responsible for local data quality—and is necessary for a truly scalable solution.

The Deloitte Difference

- Pre-build technology assets developed to accelerate solution development time and minimize project risk
- Experience delivering strategy, implementation, integration, and deployment services across 20+ clients, technology and business functions.
- Cutting edge understanding of Global HCP Transparency reporting requirements and the impact of these requirements on system and process design.

Key GTS potential benefits—Data quality and scalability

Data quality and scalability begin with establishing an effective operating model. The roles and responsibilities for collecting, monitoring, correcting and publishing data need to be clearly defined and communicated. Deloitte has helped many companies through this process and can assist your organization in designing the appropriate Global HCP Transparency operating model.

Where possible, collecting data at the source is important to achieving good data quality and scalability. The **GTS Data Standards** combined with Deloitte's extensive experience in data integration, can enable efficient, high-quality data collection from source systems.

Ongoing data monitoring is critical for maintaining data quality. **GTS pre-build operational reports** can provide an effective method of monitoring data quality across the globe on a required ongoing basis.

When data errors are discovered, they need to be corrected. Ideally, corrections are made in source systems but some source systems (e.g., ERP, T&E, 3rd Party Vendor systems) do not allow corrections. **The GTS Portal** provides a user-friendly interface and an audit trail for correcting HCP Transparency data.

Collecting HCP Transparency data will represent a significant process and cultural change in many countries because, with the implementation of the EFPIA Disclosure code in January 2015, most European countries will have a HCP Transparency regulation for the first time.

Deloitte has collaborated with change and communications professionals in many Life Sciences organizations to develop effective and efficient HCP Transparency change management programs.

GTS pre-build technical components, combined with our extensive consulting experience, can help Life Sciences companies decrease risk, while accelerating the development and deployment of a scalable Global HCP Transparency solution, all while promoting high data quality and reducing total cost of ownership.

Contacts

For more information, please contact:

Michael DeLone
Principal
Deloitte Consulting LLP
Philadelphia, PA USA
+1 610 715 2893
mdelone@deloitte.com

Peter Wallace
Partner
Deloitte MCS Limited
London, United Kingdom
+44 20 7007 5343
pwallace@deloitte.co.uk

Kurt Conger
Director
Deloitte Consulting LLP
Philadelphia, PA USA
+1 973 441 8505
kconger@deloitte.com

Deborshi Dutt
Senior Manager
Deloitte Consulting LLP
New York, NY
+1 212 618 4170
debdutt@deloitte.com