



Physician Payments Sunshine Act Compliance

THE CHALLENGE

The Physician Payments Sunshine Act, which passed in 2010 as part of President Obama's Healthcare Reform, will affect just about every Pharmaceutical and Medical Device manufacturer in the U.S. The law states:

payment or other transfer of value' means a transfer of anything of value and includes... any compensation, gift, honorarium, speaking fee, consulting fee, travel, services, dividend, profit distribution, stock or stock option grant, or ownership or investment interest.

The law limits manufacturers' aggregate spend per physician. It mandates quarterly reporting on spend activities. And it penalizes manufacturers that do not comply.

Creating a single view of a physician and using that information to prevent over spending and compile regulatory reports is a big effort. There are numerous challenges that must be overcome in order to achieve this goal, including:

- Disparate data sources containing spend information
- Data freshness
- Diversity of consuming applications
 - Dashboards for proactive management
 - Reporting tools for regulatory reporting
- Sheer number of physicians
- Variation in state laws

THE COMPOSITE SOLUTION

Composite provides a versatile solution for Aggregate Spend Management to comply with the Physician Payments Sunshine Act. The Composite Data Virtualization Platform leverages best practices principles including abstraction, decoupling, reuse, and more, while also supporting a range of internal and industry data standards to obtain a single view of physician spend information in a simpler, faster, and more consistent manner.

Composite data virtualization supports several data federation and enterprise data sharing patterns so you can enable aggregate spend management. Composite capabilities for aggregate spend management:

- Access spend data from multiple disparate sources
- Aggregate spend data in real time to obtain a single view
- Deliver up-to-the-minute aggregate spend information to a variety of consumers including dashboards and reporting tools

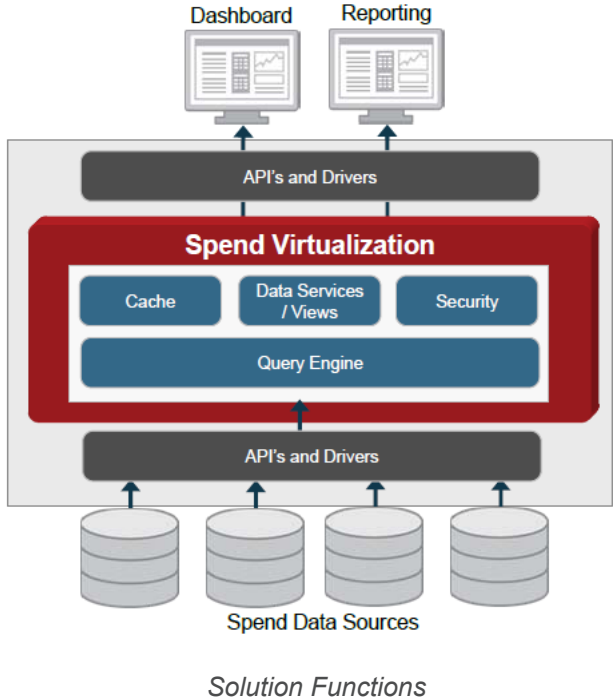
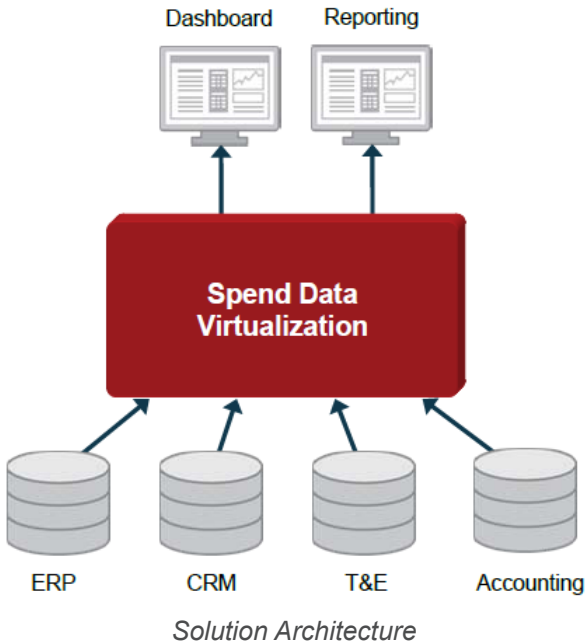
BENEFITS AND ADVANTAGES

- **Agile Architecture** - for aggregate spend management
- **Easy to add/remove** - spend data sources and consuming applications
- **Scalable** - to support increasing number of physicians and touch points
- **Improved** - data accuracy and consistency
- **Reduced operational risk** - through centralized monitoring
- **Short deployment time** - for quick time to solution
- **Reduced custom development** – to minimize complexity

SOLUTION ARCHITECTURE

The Composite solution aggregates spend data from a variety of systems to create a single view of physician spend. The solution architecture and data flow have the following characteristics:

1. Spend data reside in multiple disparate sources, i.e.:
 - ERP – products team sent sample products
 - CRM – marketing paid travel cost for speaking engagement
 - T&E – sales rep expensed dinner
2. The Virtualization Layer
 - Access spend data from all relevant sources
 - Aggregate or virtualize data into a single view
 - Adjust views as needed to comply with specific state-level provisions
 - Deliver aggregated view for real-time action or periodic reporting
3. Diverse applications consume aggregate spend information
 - Dashboards – real-time response to over-spend situations
 - Reporting – generate comprehensive reports for regulatory filing



FUNCTIONS AND FEATURES

1. Spend Data Sources
 - DW/DMs
 - Operational Systems
 - Files
2. Spend Virtualization
 - Data Services / Views – integrated view of spend data
 - Cache – materialized copies of selected spend data for improved performance
 - Security – ensure sensitive data is viewed only by those authorized to do so
 - Query Engine – optimized federated query to combine various types of spend data at runtime
3. Spend Management
 - Dashboards – real-time response to over spend
 - Reporting – periodically files for regulatory compliance