

REVIEW: 4th Annual Patient Services Program Compliance Survey

Virtual Twenty-First Annual PCF Pharmaceutical and Medical Device Ethics and Compliance Congress

Disclaimer

The views expressed and ideas presented in this session are those of the speakers and are not necessarily shared by the presenters' employers.

Any examples provided are hypotheticals and should not be attributed to any individual Company.



Panelists

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Agenda





Introduction

For the fourth consecutive year, Helio Health Group collected insights from compliance professionals around the industry with respect to Patient Services Programs ("PSPs"), a still-evolving element of life sciences companies' strategies that continues to bear potential risks stemming from the increasingly complex commercial and financial relationships across payer, provider, and patient organizations. Since 2017, Helio's annual patient services compliance survey has provided a year-to-year perspective of industry benchmarks for controlling the risks associated with expanding patient access to therapeutics through PSPs.

The 2020 edition of Helio's survey highlights the evolving aspects of patient services program compliance driven by a year of new developments in Federal and State enforcement activity accompanied by an unparalleled level of digital disruption throughout the life sciences sector as a whole. The results also offer a look into companies' responses to the increased monitoring burden of patient services programs in the context of 2020's dramatic shift to digital work environments.



Organizational Structure



Organizational Structure What is the size of your organization?

HEALTH

Small (Lower than Top 50 Biopharma)

477

29%

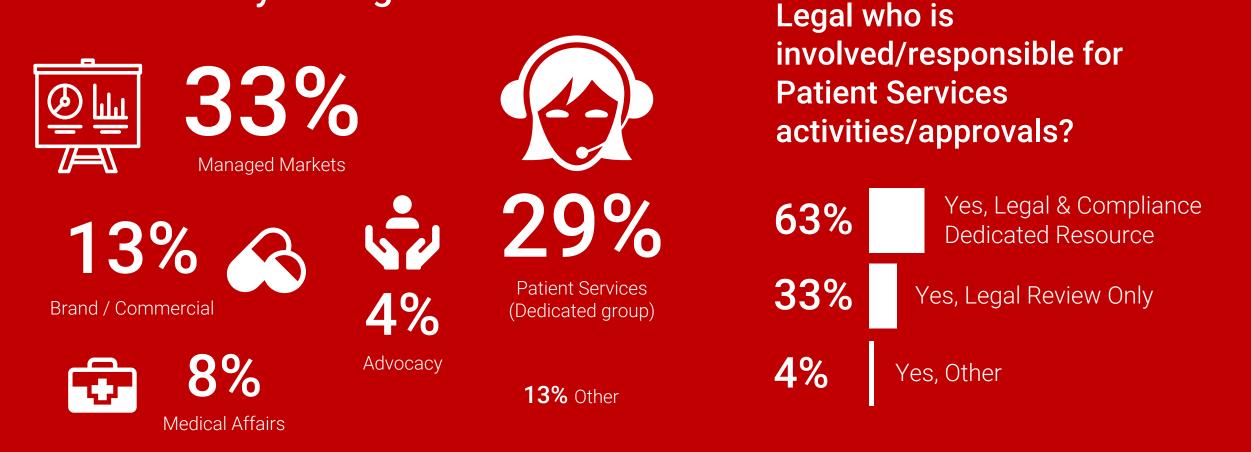
Large (Top 20 Biopharma)

25%

Medium (Top 50 to 20 Biopharma)

Organizational Structure

Where is your Patient Services team located within your organization?





Does your Company have an

individual in Compliance or

Patient Assistance Programs



Patient Assistance Programs

Does your Company provide patient assistance program(s)?

87%Yes

If applicable, select all that apply:



95%

Co-payment Cards/Vouchers





Bridge/Gap Program

5% Uncertain

60%



Patient Assistance Programs

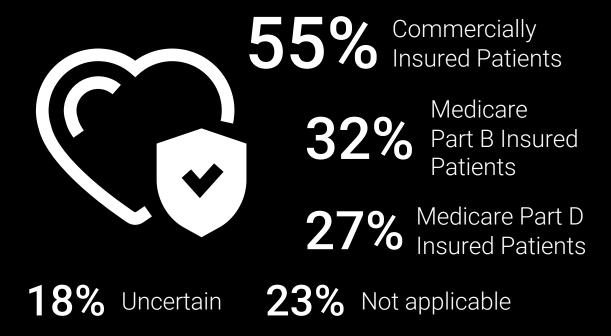
If applicable, do you have policies and/or procedures for the operation of or participation in the PAP?

 77%
 Yes

 18%
 No

 5%
 Uncertain

Does your Company provide free drug to the following? Select all that apply.





What is your biggest concern regarding patient services and compliance? Select all that apply.

Hub / Vendor Patient Interactions	47%	Free Drug Provision	26%
Nurse Educator -HCP Interactions	42%	Co-Pay Card Management	26%
Hub / Vendor Management	37%	Reimbursement / Benefit Support Provision	16%
Nurse Educator – Patient Interactions	32%	Patient Consent	16%
Sales Rep – Patient Interactions	32%	Case Manager Activities	11%
HIPAA Compliance	32%	Call Center Monitoring	5 %
Specialty Pharmacy Provision of PSPs	26%	Gap Drug / Bridge Program	5 %
Independent Charitable PAP Funding	26%	Other	11%





Which of the following types of individuals/groups does your Patient Services team include? Select all that apply.





Which of the following services does your Patient Services Team provide through a HUB? Select all that apply.

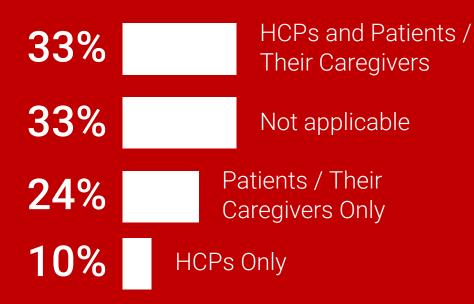
Prior Authorization Support	72%
Benefit Verification	72%
Reimbursement Support	67%
Co-Pay Assistance	61%
Patient Assistance Programs	56%
Adherence Management	39%
Patient Drug or Disease State	33%

%
%



Education

If you have nurse educators, whom do your Patient Services nurse educators interact/support?



If you have nurse educators, which of the following resources do they use? Select all that apply.



22% Not applicable

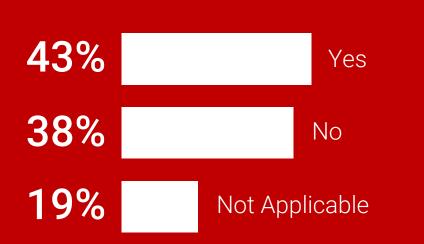


Are you recording calls of your nurse educators or other patient services team members?





Do you provide any Patient Services to patients using your product for an unapproved indication?



If applicable, which of the following Patient Services do you provide to patients using your product for an unapproved indication? Select all that apply.

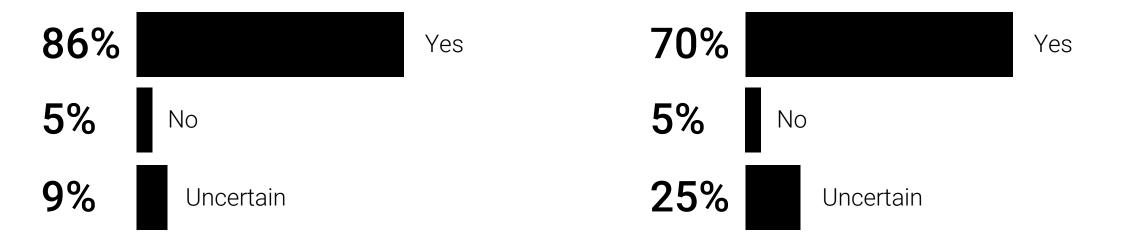
29%	Prior Authorization	18%	Reimbursement Support	
29%	Support Benefit Verification	18%	Co-Pay Card Assistance	
29%	Patient Assistance Program	6%	Patient Drug or Disease State Education	
29%	Injection or Product Usage Training	6% 6%	Nutritional / Dietary Support Lab Services	
24%	HCP Drug or Disease	6 %	Patient Surveys / Rewards Programs	
	State Education	53% Not Applicable		





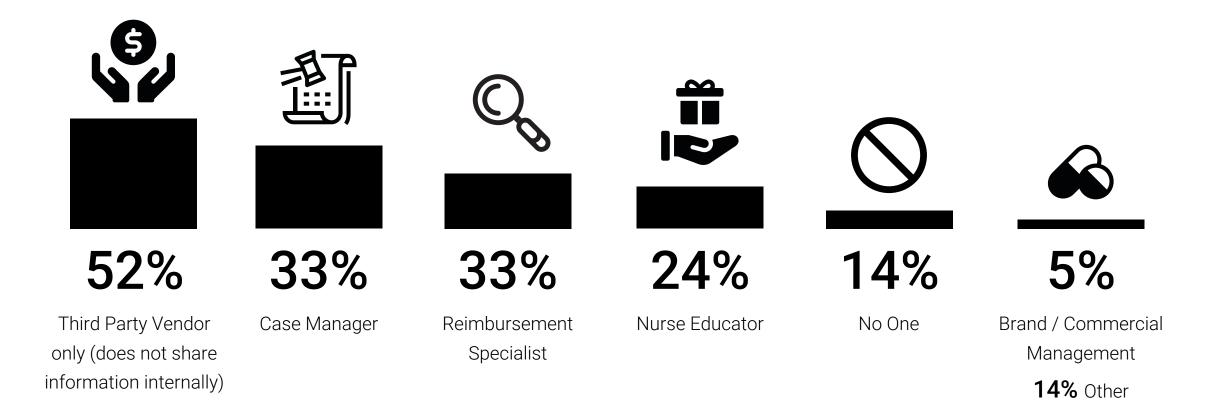
Does your Company deploy a data privacy management program?

Is your patient services platform HIPAA compliant?





Who in your organization has access to patient data or information? Select all that apply.



What specific components of patient data are shared between functional areas? Select all that apply.



Only de-identified patient information



No patient information is shared



Patient Address



Drug Shipment



10%

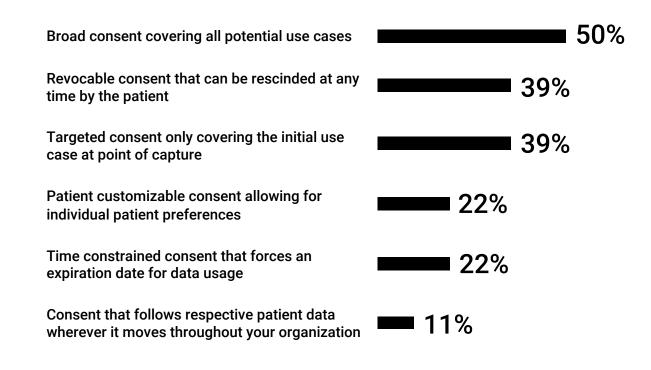
Insurance

Information

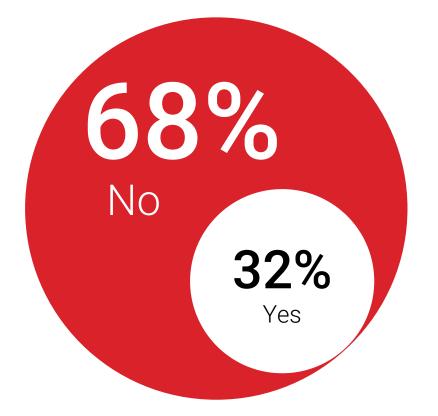
Co-Payment Assistance

15% Other

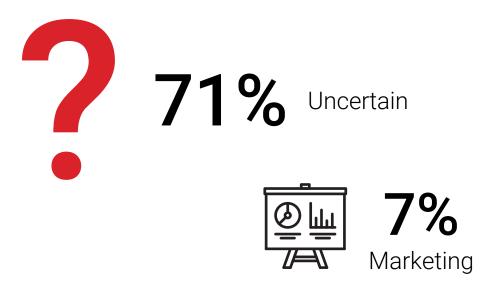
What kind of patient data consent does your Company capture? Select all that apply.



Has your Company developed Electronic Health Record (EHR) tools for use by HCP practices to facilitate diagnosis or prescription of your product?



If applicable, who was involved in the development of the EHR tool?



22% Other

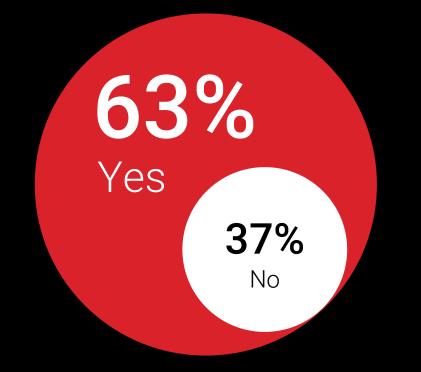


Monitoring and Auditing



Monitoring and Auditing

Does your Company monitor patient data usage to ensure compliance with regulations and consent?



How mature is your Company at monitoring patient data usage?

50%No defined patient data
monitoring processes30%Defined process with manual
management5%Defined process with system-automation with
each disparate platform0%Defined process with end-to-end data monitoring
and traceability across platforms

15% Not Applicable



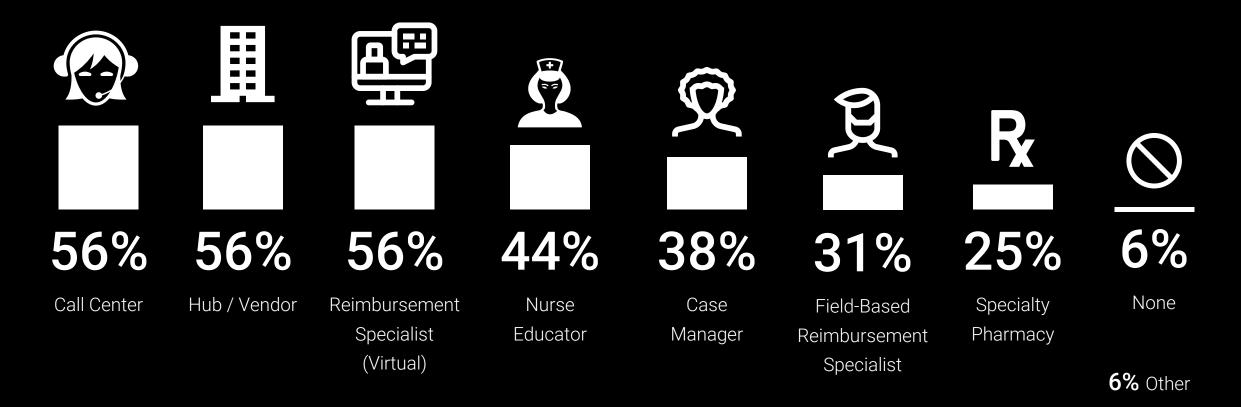
— Does your Company monitor your Patient Services team members' activities?

22% 50% 11% 17% Yes: Internally Yes: Both Internally and Third Party Yes: Third Party No 39% 22% 33% 6% Does your Company audit your Patient Services team members' activities?

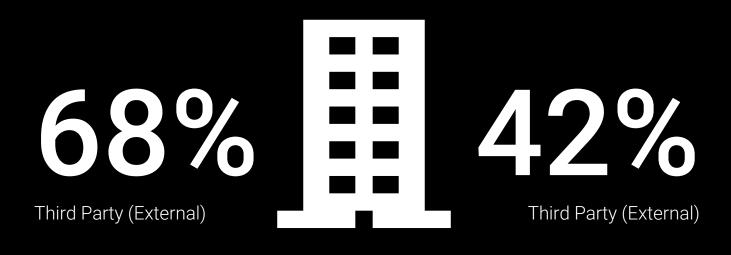


Monitoring and Auditing

Which groups are being monitored at your Company? Select all that apply.



Who manages your Patient Assistance Program's copayment card program?



Who manages your Patient Assistance Program's provision of free drug?

16% Internally

26%

Internally

16%

Not Applicable

32%



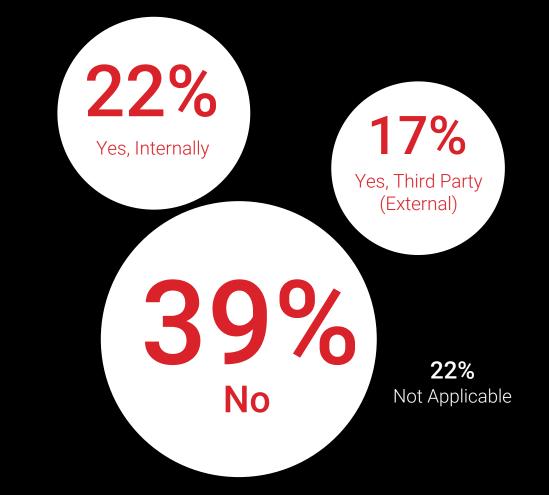
Monitoring and Auditing

Does your Company monitor your provision of co-payment cards?

28% Yes, Third Party (External) 39% Yes, 22% Internally No **11%** Not Applicable



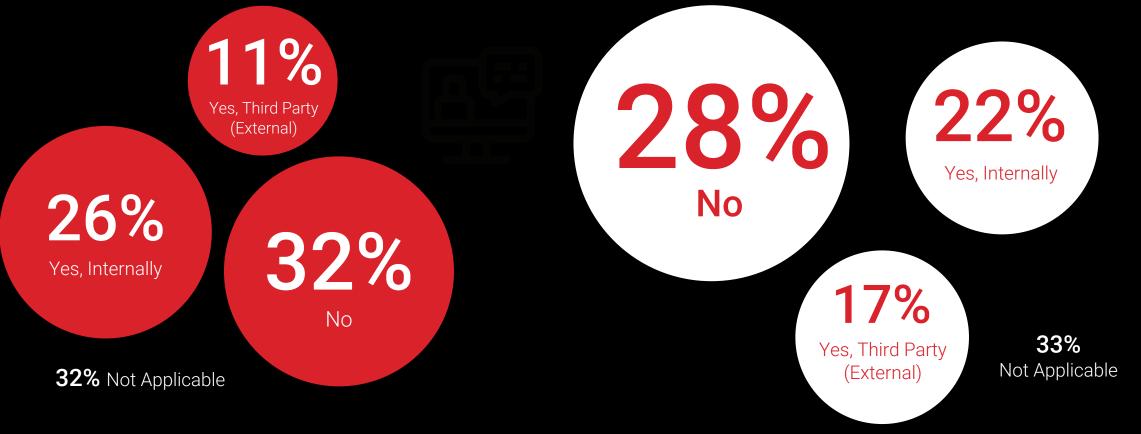
Does your Company audit your provision of co-payment cards?



Monitoring and Auditing

Does your Company monitor your provision of free drug?

Does your Company audit your provision of free drug?





Closing Thoughts

- Patient Services Programs continue to be a "moving target" for Compliance leaders
 - Life sciences companies are still trying to find the right balance of resources, technology, and internal controls to allocate to the emerging risk areas in Patient Services Programs
- The shift to digital workspaces and virtual meeting platforms has accelerated the pace at which life sciences companies are being forced to modify their compliance controls in this space.
- Patient services programs are not going to disappear any time soon.
 - The time for Compliance leaders to assess and fortify their program's readiness to handle the growing volume of risk and government scrutiny related to Patient Services Programs is *now*.



Contact Us: Full Survey Results

Full results of Helio Health Group's 2020 Patient Services Compliance Survey can be obtained by contacting:

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A thorough analysis covering the evolution of Patient Services compliance challenges and year-over-year trends from Helio's 2017-2020 surveys will be published in the December 2020 edition of *Policy & Medicine Compliance Update* (www.complianceupdate.policymed.com).



