

Electronic Versus Physical Monitoring



AND

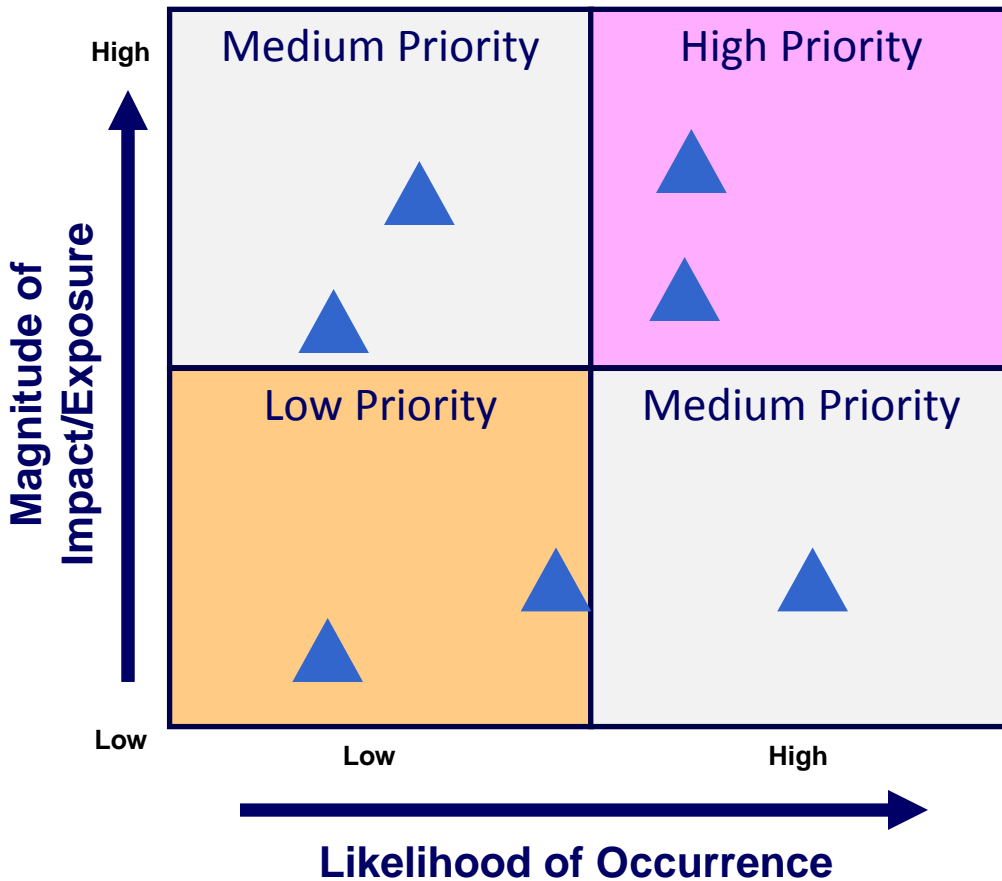


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Risk-Based Targeting

Prioritization Framework



- Focus Efforts on Elevated Risk:
 - Products
 - Geographies
 - Teams
 - Business Practices
 - Communications channels

Monitoring in Recent CIAs



	Pfizer	ALLERGAN	gsk GlaxoSmithKline	Abbott A Promise for Life
Field Monitoring				
Speaker Monitoring Program	✓	✓	✓	✓
Direct field observations	✓	✓	✓	✓
Sales representative records review (email, etc.)	✓	✓	✓	✓
HQ Monitoring / Non-Promotional Monitoring				
Consultant arrangement activities	✓	✓	✓	✓
Research-related activities		✓	✓	✓
Publication activities	✓	✓	✓	✓
Medical education grants	✓	✓	✓	✓

Increased Focus on Monitoring

- **Higher stakes**
 - Over \$6.6 billion in settlements in 2012 YTD vs. \$5.6 billion in 2011
 - Increasing focus on individual accountability and prosecutions
- **Increasingly sophisticated enforcement environment**
 - Focus expanding to claims and balance – not just off-label
- **Monitoring required in new CIAs**
 - 2012 CIAs include GSK, Abbott, and others
- **Technologies continue to improve**
 - Allowing for enhanced targeting and search