

General Guidelines for Recording Meals with HCPs in Veeva

This summary is a guideline for recording interactions between Therapeutic Specialists (TS) and any HCP and his/her staff or office personnel involving the TS providing food and/or beverages.

Background:

Sunovion is committed to transparency and compliance with the new reporting requirements outlined by the Sunshine regulations as part of the Patient Protection and Affordable Care Act (PPACA), which came into effect on August 1, 2013. Accordingly, Therapeutic Specialists must record “Transfers of Value,” such as meals and reprints to healthcare professionals and teaching hospitals in Veeva to comply with the new law. We believe these requirements will ultimately enhance the level of public trust for Sunovion and the industry at large.

Sunovion policy allows the TS to provide a modest, occasional meal to HCPs and affiliated staff as a courtesy to allow the representative to “detail” the HCPs. Sunovion uses the Veeva CRM system as the source of reporting all Lunch & Learn (L&L) and reprint activity as required under Federal and certain State laws. It is imperative that each TS ensure accurate record-keep of any spend or transfer of value involving HCPs.

Specifics:

1. **ALL** spending, regardless of amount, is to be recorded in the Call within Veeva. There is no *de minimis* amount.
2. **ALL** attendees partaking in the meal are to be recorded in the Call within Veeva. This includes not only MDs, DOs, PAs, NPs, RNs, LPNs, MAs and any other credentialed HCP, but also non-HCP attendees, such as: **office secretary/manager or billing personnel**.
3. The TS is **NOT** to record himself/herself as an attendee. The Veeva system automatically adds the TS into the count in determining the Individual Expense as displayed within the Call.
4. Each TS is responsible to ensure that all attendees at a L&L event are captured in the Call within Veeva.
5. If new attendees need to be added, it is important for the TS to ensure the new individual is affiliated to the Practice or HCP Target to ensure that future Veeva updates will not remove the individual.

If you have any questions, please contact Joe Wholley (joseph.wholley@sunovion.com, (508) 787-4287), Dave Ducharme (david.ducharme@sunovion.com, (508) 787-4235), or Paul Steele (paul.steele@sunovion.com, (508) 787-4231).