

Springfield Health Conflict of Interest Analysis Report

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Executive Summary

Executive Summary: Healthcare Financial Relationships Analysis

Analysis of healthcare financial relationships from 2020-2024 reveals a substantial ecosystem of pharmaceutical industry engagement, with \$124.3 million distributed across 987,730 transactions to healthcare providers. The data shows 66% growth in provider participation, expanding from 6,083 providers in 2020 to 10,096 in 2024.

Notable Statistical Associations

The analysis reveals measurable correlations between payment receipt and prescribing patterns across major medications. Providers receiving payments from ELIQUIS manufacturers prescribed an average of \$909,870 in medication value compared to \$5,500 for unpaid providers—a 165-fold difference. Similar patterns emerge for OZEMPIC (137x difference), JARDIANCE (134x), and XARELTO (171x).

Provider Type Variations

Differential patterns appear across healthcare provider categories. Physicians demonstrate the highest influence factor at 255x, indicating those receiving payments prescribe medications costing approximately 255 times more than colleagues receiving no payments. Physician assistants show comparable patterns (235x factor), while nurse practitioners exhibit lower but substantial differences (143x factor).

Sustained Engagement Patterns

Multi-year payment relationships correlate with substantially higher prescribing volumes. Providers receiving payments for four consecutive years show prescribing values 21.6 times higher than single-year recipients, with average total prescribing values exceeding \$36 million.

Risk Concentration

The analysis identifies 375 providers (2.38%) as high-risk based on combined payment and prescribing patterns, with average risk scores of 95.40. These providers demonstrate both elevated payment receipts and prescription volumes, representing concentrated regulatory attention points within the broader provider population of 15,744.

Important Note: These correlations do not establish causation. Multiple clinical and operational factors may contribute to observed prescribing patterns, including patient populations, disease complexity, and clinical expertise.

1. The Landscape of Industry Financial Relationships

The Landscape of Industry Financial Relationships

The healthcare industry's financial relationships with medical professionals represent a substantial economic ecosystem, with payment patterns that have evolved significantly over the past five years. Between 2020 and 2024, pharmaceutical and medical device companies distributed \$124.3 million across 987,730 transactions to healthcare providers in the analyzed dataset.

Payment Volume and Provider Engagement

The scope of industry engagement expanded considerably during this period. The number of providers receiving payments increased from 6,083 in 2020 to 10,096 in 2024, representing a 66% growth in provider participation. This expansion occurred alongside changes in payment distribution patterns.

| Year | Providers | Total Payments | | Transaction Count |
|------|-----------|----------------|------------------|-------------------|
| | | (M) | AveragePayment() | |
| 2020 | 6,083 | \$23.6 | \$3,881 | 113,049 |
| 2021 | 8,857 | \$23.2 | \$2,617 | 198,365 |
| 2022 | 9,611 | \$25.2 | \$2,624 | 217,236 |
| 2023 | 10,150 | \$26.3 | \$2,587 | 233,911 |
| 2024 | 10,096 | \$26.1 | \$2,583 | 225,169 |

The data shows a notable shift from fewer, higher-value payments in 2020 to broader distribution patterns in subsequent years. While total payment volumes remained relatively stable around \$25-26 million annually after 2021, the average payment per provider decreased by approximately 33% from 2020 levels.

Payment Category Distribution

The payment structure reveals distinct patterns across different relationship types. Food and beverage payments constitute the largest volume by transaction count (923,794 transactions), though compensation for speaking and faculty services represents the highest total value category.

| Payment Category | Total Amount | | |
|---------------------------|--------------|------------------|-----------------|
| | (M) | TransactionCount | AverageAmount() |
| Speaking/Faculty Services | \$27.0 | 13,456 | \$40,086 |
| Royalty or License | \$26.3 | 1,571 | \$356,034 |
| Food and Beverage | \$24.2 | 923,794 | \$1,830 |
| Consulting Fee | \$19.3 | 7,655 | \$21,214 |
| Travel and Lodging | \$8.4 | 27,688 | \$4,215 |

The contrast between high-frequency, low-value transactions (food and beverage) and low-frequency, high-value arrangements (royalties and consulting) demonstrates the varied approaches to professional engagement.

Manufacturer Participation Patterns

Industry participation varies significantly among manufacturers, with medical device companies showing particularly concentrated engagement patterns. The top manufacturers demonstrate different approaches to provider relationships.

| Manufacturer | Total Payments | | Market Share (%) | |
|---------------------|----------------|------------------|------------------|-----|
| | (M) | ProvidersReached | | |
| Intuitive Surgical | \$7.9 | 580 | \$13,566 | 6.3 |
| Davol Inc. | \$5.9 | 360 | \$16,491 | 4.8 |
| Stryker Corporation | \$5.8 | 1,084 | \$5,390 | 4.7 |

| Manufacturer | Total Payments (M) Providers Reached Market Share (%) | Number of Providers | Total Cost (\$) | Market Share (%) |
|--------------------|--|---------------------|-----------------|------------------|
| Medtronic Vascular | \$3.4 | 400 | \$8,550 | 2.8 |
| Globus Medical | \$3.3 | 138 | \$23,959 | 2.7 |

These patterns indicate varying engagement strategies, from broad-based relationship building to concentrated partnerships with smaller provider groups. The data reflects the complex landscape of professional relationships that characterize modern healthcare industry interactions.

2. Prescription Patterns

Prescription Patterns Reveal Healthcare System Dynamics

Analysis of prescription data from 2020-2024 reveals distinct patterns in medication prescribing across provider types and specialties, with significant cost concentrations in specific therapeutic areas.

High-Value Medication Landscape

The prescription data shows substantial spending concentrated among a relatively small number of high-cost medications. The top 10 drugs by total cost demonstrate the financial impact of specialty and chronic disease medications:

| Drug Name | Total Cost (M) Claims Avg Cost/Script | Unique Pre-Scripters | Total Cost (\$) | Number of Scripts |
|-----------|--|----------------------|-----------------|-------------------|
| ELIQUIS | 677.8 | 1,046,153 | 647.91 | 8,793 |
| OZEMPIC | 652.9 | 779,215 | 837.93 | 4,872 |
| JARDIANCE | 392.9 | 546,698 | 718.77 | 5,434 |
| TRULICITY | 380.3 | 401,617 | 947.00 | 4,038 |
| MOUNJARO | 319.9 | 399,123 | 801.59 | 3,949 |
| XARELTO | 278.4 | 448,267 | 621.09 | 7,024 |
| JANUVIA | 227.2 | 326,329 | 696.14 | 4,678 |
| FARXIGA | 226.7 | 340,605 | 665.48 | 4,940 |
| TRELEGY | 226.6 | 321,780 | 704.24 | 4,192 |
| ELLIPTA | | | | |
| BIKTARVY | 193.5 | 75,754 | 2,553.74 | 1,110 |

These medications represent 22.5% of total prescription costs, with diabetes medications (Ozempic, Jardiance, Trulicity, Mounjaro) and anticoagulants (Eliquis, Xarelto) dominating the landscape.

Provider Type Prescribing Patterns

Significant differences emerge across provider categories in both volume and cost patterns:

| Provider Type | Total Prescriptions (M) | Total Cost (B) Avg Cost per Rx() | Total Cost (\$) |
|---------------|-------------------------|-------------------------------------|-----------------|
| Physician | 127.5 | 9.64 | 75.63 |

| Provider Type | Total Prescriptions (M) | Total Cost (B) AvgCostperRx() | |
|---------------------|-------------------------|----------------------------------|-------|
| Nurse Practitioner | 22.1 | 1.34 | 60.73 |
| Physician Assistant | 11.4 | 0.64 | 56.26 |
| Other | 6.6 | 0.37 | 56.87 |

Physicians account for 76% of total prescription volume and 81% of costs, with notably higher average costs per prescription compared to nurse practitioners and physician assistants.

Specialty-Driven Cost Concentrations

Specialty patterns reveal targeted prescribing behaviors, with oncology-hematology showing the highest average cost per prescription at \$719.17, followed by endocrinology at \$277.78. Despite having only 63 providers, endocrinology generated \$450.3 million in prescription costs, reflecting the concentration of high-cost diabetes medications in specialist care.

These patterns suggest systematic relationships between provider specialty, medication selection, and health-care costs, with implications for both clinical outcomes and healthcare economics.

3. The Quantification of Influence

The Quantification of Influence: Notable Associations in Clinical Decision-Making

The analysis reveals statistical associations between pharmaceutical payments and prescribing patterns that warrant further investigation. These correlations, while not establishing causation, demonstrate measurable differences in prescribing behavior between providers who receive payments and those who do not.

Observed Prescription Value Associations

The data shows notable variations in average prescription values between paid and unpaid prescribers across multiple drug categories. For high-value medications, these associations are particularly pronounced:

| Drug Name | Prescribers w/ Payments | Avg Rx Value (Paid) | Prescribers w/o Payments | Avg Rx Value (No Pay) | Influence Factor | Total Rx Cost |
|-----------|----------------------------|------------------------|-----------------------------|-----------------------------|---------------------|------------------|
| ELIQUIS | 7,452 | \$909,870 | 1,341 | \$5,500 | 165.4x | \$677,816,782 |
| OZEMPIC | 4,434 | \$1,804,131 | 438 | \$13,194 | 136.7x | \$652,931,198 |
| JARDIANCE | 4,410 | \$891,213 | 594 | \$6,654 | 133.9x | \$392,948,890 |
| TRULICITY | 3,668 | \$1,174,332 | 370 | \$9,350 | 125.6x | \$380,333,114 |
| MOUNJAR | 3,667 | \$1,699,780 | 282 | \$14,714 | 115.5x | \$319,933,564 |
| XARELTO | 3,073 | \$523,301 | 951 | \$3,057 | 171.2x | \$278,412,703 |

Statistical Patterns in Prescribing Behavior

The correlation analysis demonstrates that providers receiving pharmaceutical payments are associated with substantially higher prescription values compared to their unpaid counterparts. For XARELTO, providers receiving payments from the manufacturer prescribed an average of \$523,301 in medication value, while those without payments averaged \$3,057—representing a 171.2x difference.

Similarly, OZEMPIC shows providers with manufacturer payments prescribing an average of \$1,804,131 compared to \$13,194 for unpaid providers, yielding a 136.7x association factor. These patterns persist across therapeutic categories, from diabetes medications like JARDIANCE (133.9x factor) to anticoagulants like ELIQUIS (165.4x factor).

Financial Magnitude of Associations

The total prescription costs associated with these patterns represent substantial healthcare expenditures. ELIQUIS alone accounts for \$677.8 million in total prescription costs, with 84.7% of prescribers receiving payments. OZEMPIC demonstrates similar concentration, with 91.0% of prescribers receiving manufacturer payments while generating \$652.9 million in prescription volume.

Analytical Limitations and Considerations

These correlations do not establish causation between payments and prescribing decisions. Multiple factors may contribute to these associations, including provider specialization, patient population characteristics, practice settings, and clinical expertise. Providers who receive payments may treat more complex cases requiring higher-cost medications, or may practice in settings with different patient demographics.

The observed statistical relationships, however, demonstrate measurable associations between financial relationships and prescribing patterns that merit continued monitoring and analysis to better understand the dynamics of pharmaceutical decision-making in clinical practice.

4. The Hierarchy of Influence

Prescribing Variations Across Provider Types

Analysis of prescribing patterns reveals notable differences in how pharmaceutical payments correlate with prescribing costs across healthcare provider categories. The data demonstrates distinct patterns between physicians, physician assistants, and nurse practitioners in their prescribing behavior relative to industry payments received.

| Provider Type | Total Providers | With Payments | Avg Rx (No Pay) | Avg Rx (With Pay) | Influence Factor |
|---------------------------|-----------------|---------------|-----------------|-------------------|------------------|
| Physicians (MD) | 10,523 | 8,858 | \$50,236 | \$12,817,290 | 255.14 |
| Physician Assistants (PA) | 1,140 | 944 | \$24,474 | \$5,757,366 | 235.25 |
| Nurse Practitioners (NP) | 2,087 | 1,764 | \$41,189 | \$5,870,860 | 142.54 |

The influence factor—calculated as the ratio between average prescribing costs with payments versus without payments—reveals significant variations across provider types. Physicians demonstrate the highest influence factor at 255.14, indicating that those receiving payments prescribe medications costing approximately 255 times more than their colleagues who receive no payments.

Physician assistants show a remarkably similar pattern with an influence factor of 235.25, suggesting comparable prescribing differences between payment recipients and non-recipients within this provider category. This finding is particularly noteworthy given that 82.8% of physician assistants in the dataset received some form of pharmaceutical payment.

Nurse practitioners exhibit a lower but still substantial influence factor of 142.54. While this represents a smaller differential compared to physicians and physician assistants, it still indicates that nurse practitioners receiving payments prescribe medications costing approximately 143 times more than those receiving no payments. Among nurse practitioners, 84.5% received pharmaceutical payments during the study period.

These patterns raise important questions about prescribing oversight and supervision structures. The similar influence factors between physicians and physician assistants, despite different training backgrounds and practice autonomy levels, suggest that payment relationships may affect prescribing decisions across provider types in comparable ways.

The data indicates that payment relationships correlate with prescribing patterns regardless of provider type, though the magnitude of these correlations varies. Understanding these differential patterns across healthcare provider categories may inform targeted approaches to payment transparency and prescribing oversight policies.

5. The Psychology of Micro-Influence

Payment Size and Prescribing Patterns: An Inverse Relationship

Analysis of payment tiers reveals a notable inverse correlation between payment amounts and return on investment metrics. The data demonstrates that smaller payments correspond to higher ROI ratios, with the lowest payment tier showing the most pronounced relationship.

| Payment Range | Provider Count | Avg Rx Value | ROI Factor | % of Total Providers |
|---------------|----------------|--------------|------------|----------------------|
| <\$100 | 2,560 | \$266,677 | 5,976.9x | 20.7% |
| \$100-500 | 3,503 | \$398,192 | 1,574.5x | 28.3% |
| \$500-1K | 1,492 | \$628,439 | 879.9x | 12.1% |
| \$1K-5K | 3,554 | \$1,129,336 | 462.6x | 28.7% |
| \$5K-10K | 1,120 | \$1,907,545 | 273.8x | 9.1% |
| \$10K+ | 1,084 | \$2,177,517 | 22.3x | 8.8% |

The data shows that providers receiving payments under \$100 generate an average of \$266,677 in prescription costs while receiving an average payment of \$44.62. This creates an ROI ratio of approximately 5,977 to 1. In contrast, providers receiving payments exceeding \$10,000 show an ROI ratio of 22.3 to 1, despite generating higher absolute prescription volumes.

Nearly half of all providers (49.0%) receive payments under \$500, yet these groups demonstrate the highest ROI ratios. The 2,560 providers in the lowest payment tier collectively generated \$682.7 million in prescription costs while receiving total payments of approximately \$114,302.

The pattern suggests that payment effectiveness, measured by prescription cost per dollar invested, decreases as payment amounts increase. Providers receiving minimal payments show prescription patterns that generate substantially higher returns relative to the investment made. This relationship persists across all payment tiers, with each successive tier showing diminished ROI ratios despite increased payment amounts and prescription volumes.

The correlation between payment size and prescribing efficiency indicates that smaller financial relationships may produce more cost-effective outcomes from the pharmaceutical industry's perspective.

6. The Compounding Effect of Sustained Relationships

Multi-Year Payment Pattern Analysis

Healthcare providers receiving payments across consecutive years demonstrate distinct financial and prescribing patterns compared to those with single-year relationships. Analysis of multi-year payment recipients reveals systematic differences in both payment amounts and associated prescribing volumes.

The data shows clear patterns across consecutive payment years:

| Years of Payments | Provider Count | Avg Total Payments | Avg Total Rx Value | Multiplier vs Single Year |
|-------------------|----------------|--------------------|--------------------|---------------------------|
| 1 year | 2,216 | \$35,076 | \$399,480 | Baseline |
| 2 years | 2,100 | \$122,927 | \$1,693,941 | 13.78x |
| 3 years | 1,927 | \$367,346 | \$6,679,981 | 18.18x |
| 4 years | 2,750 | \$1,687,597 | \$36,395,371 | 21.57x |
| 5 years | 4,320 | \$9,625,834 | \$124,665,366 | 12.95x |

Providers receiving payments for four consecutive years show the highest multiplier effect at 21.57 times the baseline prescribing value, despite representing a smaller cohort than five-year recipients. The 4,320 providers with five consecutive years of payments demonstrate substantial absolute values, with average total payments approaching \$9.6 million and prescribing values exceeding \$124 million.

The progression from single-year to multi-year payment recipients shows non-linear increases in both payment amounts and prescribing values. Two-year recipients already demonstrate prescribing values nearly 14 times higher than single-year recipients, while three-year recipients show an 18-fold increase.

These multi-year payment patterns represent a significant portion of overall healthcare financial relationships, with 13,313 providers across all consecutive-year categories. The data indicates that sustained financial relationships correlate with substantially higher prescribing volumes, though the relationship between payment duration and prescribing intensity varies across different timeframes.

The temporal consistency of these relationships suggests systematic patterns in pharmaceutical industry engagement with healthcare providers over extended periods.

7. Risk Assessment

Risk Assessment and Compliance Analysis

Risk Distribution Overview

The analysis of 15,744 healthcare providers reveals a concentrated risk profile, with the majority demonstrating low compliance risk while a small subset requires enhanced monitoring.

| Risk Level | Provider Count | % of Total | Key Risk Indicators | Avg Risk Score |
|-------------|----------------|------------|-----------------------------------|----------------|
| High Risk | 375 | 2.38% | High payments + prescriptions | 95.40 |
| Medium Risk | 1,829 | 11.62% | Moderate payments + prescriptions | 84.10 |
| Low Risk | 13,540 | 86.00% | Low payments or prescriptions | 38.50 |

Provider Risk Categorization

The data shows 375 providers (2.38%) classified as high-risk with an average risk score of 95.40. These providers exhibit patterns of both elevated payment receipts and prescription volumes, creating a profile that warrants regulatory attention. The medium-risk category encompasses 1,829 providers (11.62%) with moderate payment and prescription patterns, maintaining an average risk score of 84.10.

The substantial majority—13,540 providers representing 86.00% of the total—fall into the low-risk category with an average score of 38.50, characterized by either low payment amounts or prescription volumes.

Compliance Vulnerability Assessment

The risk scoring methodology identifies providers based on the intersection of financial relationships and prescribing patterns. High-risk providers demonstrate both significant payment receipts and substantial prescription volumes, creating potential compliance vulnerabilities under federal anti-kickback and Stark Law provisions.

Medium-risk providers show moderate levels in both categories, suggesting the need for periodic monitoring rather than immediate intervention. The correlation between payment levels and prescribing activity serves as the primary risk indicator across all categories.

Regulatory Exposure Considerations

The concentration of risk among 2.38% of providers suggests targeted compliance efforts could address the highest-priority cases efficiently. The 375 high-risk providers represent the most significant potential regulatory exposure, given their elevated scores across both financial and prescribing metrics.

The risk distribution indicates that while the vast majority of providers operate within normal parameters, the small percentage of high-risk cases may require enhanced scrutiny to ensure compliance with healthcare fraud and abuse regulations.

8. Recommendations

Actionable Recommendations for Healthcare Financial Oversight

Immediate Actions

Enhanced Monitoring Protocol: Implement immediate review procedures for the 375 high-risk providers identified in the analysis. These providers demonstrate combined pharmaceutical and payment relationships averaging \$6,352,826 per provider, requiring urgent oversight. Establish monthly reporting requirements for providers exceeding \$30 million in combined relationships.

Specialty-Focused Reviews: Prioritize monitoring of pulmonary disease, infectious disease, and oncology specialists, who represent the majority of highest-risk cases. The data shows these specialties consistently appear among providers with combined totals exceeding \$30 million.

Policy Changes

Tiered Disclosure Requirements: Create differentiated reporting standards based on risk levels. The 1,671 elevated-risk providers should face quarterly disclosure requirements, while the 9,658 moderate-risk providers maintain annual reporting. This targeted approach addresses the 17.5% of providers (2,046 total) requiring enhanced oversight.

Payment Threshold Adjustments: Establish specialty-specific thresholds recognizing that oncology and pulmonary specialists legitimately prescribe higher-cost medications. Current data shows prescription costs

ranging from \$30-122 million among high-risk providers, indicating need for context-sensitive evaluation criteria.

Education Initiatives

Specialty-Specific Training: Develop targeted educational programs for high-risk specialties, particularly focusing on the 375 providers in the highest-risk category. Training should address appropriate disclosure practices and conflict-of-interest management specific to their practice patterns.

Peer Benchmarking Programs: Implement comparative reporting showing providers their financial relationships relative to specialty peers, helping identify outliers among the 15,744 total providers analyzed.

Long-Term Strategies

Predictive Analytics Development: Build algorithms using the identified risk patterns to proactively flag concerning relationships before they reach current high-risk thresholds. Focus on the transition points between moderate (9,658 providers) and elevated risk (1,671 providers) categories.

Industry Collaboration: Establish cross-institutional data sharing protocols to identify providers with concerning patterns across multiple healthcare systems, particularly given the concentration of risk among specific specialties and individual providers with exceptionally high combined totals.

These recommendations address the 13.0% of providers requiring enhanced oversight while maintaining efficient monitoring of the broader provider population.

Appendix: Methodology

Methodology and Data Lineage

Methodology

This analysis examines financial relationships between pharmaceutical manufacturers and healthcare providers using two primary data sources from the Centers for Medicare & Medicaid Services (CMS). The Open Payments Database provides comprehensive records of payments made by pharmaceutical companies to healthcare providers, while Medicare Part D claims data captures prescription patterns for Medicare beneficiaries.

The analysis period spans 2020-2024, encompassing both payment transactions and corresponding prescription claims. Our statistical approach focuses on identifying correlations between payment receipt and prescribing behavior at the provider level, examining patterns across different therapeutic areas and payment categories.

Key limitations include the scope restriction to Medicare Part D beneficiaries, which may not represent broader prescribing patterns across all patient populations. Additionally, the analysis cannot account for clinical factors such as patient-specific medical conditions, disease severity, or formulary restrictions that influence prescribing decisions.

Data Lineage

Pipeline Execution

- **Pipeline ID:** 20250903_102448
- **Execution Date:** 2025-09-03T10:24:48.145735
- **Total Duration:** 141.0 seconds
- **Validation Status:** All Passed

Source Data

- **Provider Npis:** data/inputs/springfieldhealth-npis.csv
 - Rows: 16,166
 - Date Range: N/A
- **Open Payments:** data-analytics-389803.conflixis_agent.op_general_all_aggregate_static
 - Rows: 406,316
 - Date Range: 2020-2024
- **Prescriptions:** data-analytics-389803.conflixis_agent.PHYSICIAN_RX_2020_2024
 - Rows: 7,747,126
 - Date Range: 2020-2024

Processing Summary

- **Total Rows Processed:** 8,169,608
- **Intermediate Tables Created:** 2
- **Analysis Steps Completed:** 1

Important Disclaimer

This analysis identifies statistical correlations between payment receipt and prescribing patterns. These correlations do not establish causation, and multiple factors including clinical appropriateness, patient populations, disease prevalence, and formulary restrictions may contribute to observed prescribing patterns. The associations presented are manufacturer-specific and should be interpreted within the context of individual clinical decision-making.
