

11/4/2016

Review Date: Operating Procedure: Pharmaceutical Representative Sponsored Lunches

Purpose:

To outline the approved process to allow pharmaceutical sponsored lunches to be brought into a Bellin Primary Care Clinic or Specialty Clinic.

The purpose of the lunches is to be educational in nature for providers of health care in order to enhance and maintain their knowledge of pharmaceutical agents.

Operational Requirements:

Pharmaceutical lunches or other pharmaceutical sales expenses reportable under the Sunshine Act will not exceed the individually reportable amount per event and per year for any physician. For 2016 the individual amount is set at \$10.18 per lunch event per physician and the total annual limit is \$101.75. This amount may be adjusted from year to year based on CPI.

No pharmaceutical representative lunches will be held at Bellin Primary Care or Specialty Clinics unless this procedure is in compliance.

No copyrighted clinical reprints or publications, except patient educational materials, savings cards, or vouchers will be accepted by staff. Only providers can accept clinical reprints or publications as these dollars are reportable under the Sunshine Act.

If a Physician feels they should have an exception made to this policy they should ask to meet with the Primary Care Business Excellence Committee or the Bellin Specialty Group Executive Committee to request an exception.

Procedure:

Only pharmaceutical companies that meet the following will be considered for the provision of lunch at a Bellin Primary Care Clinic or a Bellin Specialty Clinic:

1. Comply with all of the Sunshine Act regulations. **The reporting requirements of the Sunshine Act supersede any part of this policy.**
2. Pharmaceutical representatives are required to fully complete and sign the Application to Supply a Pharmaceutical Lunch one time per year.
3. Obtain the Clinic Leader's approval for each lunch requested to be provided.
4. Pharmaceutical representatives are required to agree to the following:
 - a. Report only those items that are required to be reported by the Sunshine Act, any items not required to be reported will not be reported. For example: the costs of patient educational information materials are not required to be reported and are not reported.
 - b. Report only those amounts over the \$10 unless those payments total \$100 over the course of a year.
 - c. Agree to provide a report to the Clinic Leader from the pharmaceutical company before and after the luncheon showing inclusively all of the monies reported to the Sunshine Act by the pharmaceutical company by physician.

- d. In the situations where the pharmaceutical company reaches the maximum dollar allotment per physician per year, the Pharmaceutical Company cannot provide any additional pharmaceutical lunches for that year. Typically the limit would be reached at 9 lunches per year if the lunches are \$10.18 per lunch.
- e. Report only amounts paid for meals for licensed physicians who attended. If pharmaceutical companies are providing lunch for more than just a physician, they should not take the total lunch cost and but divide it by the number of physicians in attendance for that lunch. For example: If the pharmaceutical representative provides lunch for 10 people and only 1 physician attends, only the cost of the meal for 1 physician should be assigned or reported for that physician. If the pharmaceutical company policy or regulations require the total cost to be attributed to the physician, the pharmaceutical rep is only allowed to provide food for those physicians attending.
- f. Pharmaceutical representative agrees the total cost of the meal, including all food beverages, tax, tip gratuity, and delivery fees brought in will be less than the per event amount required for reporting of \$10.18 in 2016. The pharmaceutical representative also agrees that the total cost of all meals, including all food beverages, tax, tip gratuity, and delivery fees brought in for a year will be less than the annual amount required for reporting of \$101.75 in 2016.
- g. All proposed pharmaceutical lunches must have learning objectives approved by a Bellin Physician before the luncheon and after the presentation must decide how well the objectives were met. This can be a questionnaire asking to rate on a scale of 1-5 with 1 being no value and 5 being of high value how well the educational program met the learning objectives.

4. This policy is subject to being audited.



Application to Supply a Pharmaceutical Lunch

One form is completed for each lunch date requested.

Date Request is made: _____

Name of Pharmaceutical Rep: _____

Name of Pharmaceutical Company: _____

Attached card or provide:

Phone number of Representative: _____

Email of Representative: _____

Luncheon Dates Requested (list options, the Clinic Leader will confirm the date approved)

TERMS AND CONDITIONS:

I agree to report only those items that are required to be reported by the Sunshine Act, items not required to be reported will not be reported.

I agree the total cost of the meal, including all food, beverage, tax; tip or gratuity, and delivery fees will be less than the individual or annual amount required for reporting.

I agree not to exceed the individual or annual reportable amounts in the Sunshine Act in provision of lunches or other reportable items for each individual physician as reported in total by my pharmaceutical company.

I agree to supply an all-inclusive report of all monies reported to the Sunshine Act by physician from your pharmaceutical company prior to and post the pharmaceutical luncheon.

I agree to the Bellin terms and conditions required to provide pharmaceutical lunches at a Bellin Primary Care Clinic.

Signature: _____

Sample Learning Objective Form

On a Scale of 1-5 with 5 being high
rate how well each objective was met

Learning Objectives: Each luncheon is required to have learning objectives.

1. _____
2. _____
3. _____
4. _____
5. _____

Approved Bellin Medical Group Provider: _____

Approved Clinic Leader: _____

Date(s) of Lunch Approved: _____