



ADVAMED DDCG SUMMER OF BENCHMARKING: EFFECTIVE COMPLIANCE TRAINING & MESSAGING

July 30, 2020

AGENDA

- 1:00pm Welcome, Agenda & Antitrust Statement
- 1:05pm Survey Results Review
- 1:15pm Compliance in Conversation w/ Audience Q&A
- 2:15pm Open Floor
- 2:30pm Adjournment

ANTITRUST STATEMENT

PURPOSE OF ANTITRUST GUIDANCE

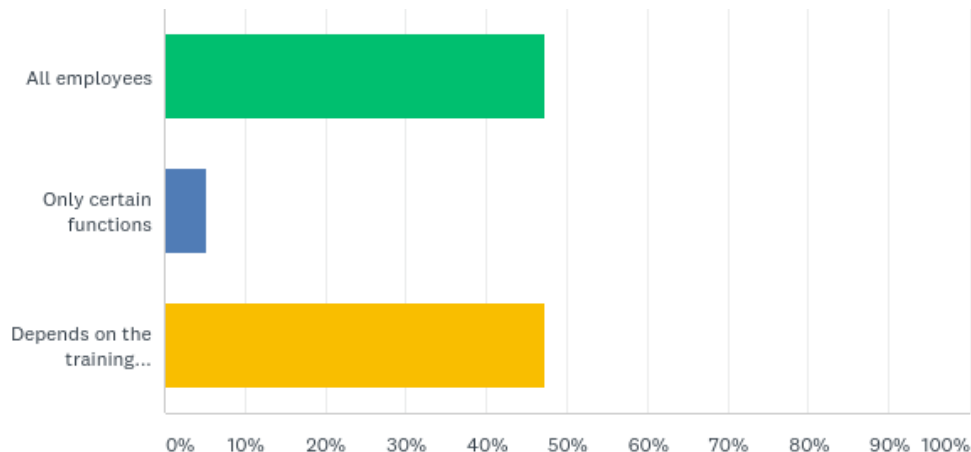
AdvaMed regularly reminds members of importance of antitrust principles and meeting guidelines. AdvaMed is an association of competitors. It can be liable for agreements among its members that reduce competition. The penalties for violating the antitrust laws are severe and the cost in bad publicity and litigation can be devastating. Be concerned about the reality AND the appearance. All AdvaMed activities should comply with U.S. and applicable foreign laws. Discussions should be about policy recommendations to the government, not about what companies are doing in the private marketplace.

CONDUCTING MEETINGS: TOPICS TO AVOID

- actual or list prices
- future prices
- recent or future costs
- recent or future production levels
- business strategies, including marketing plans, research & development, and product development
- products to be offered in the future
- special competitive terms to be offered in the future

I. RECIPIENTS, METHODS & CADENCE

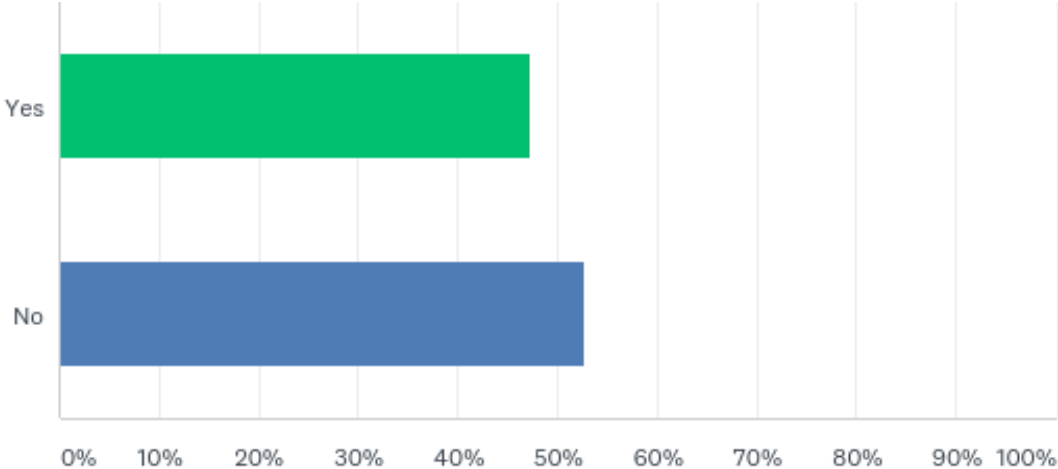
Q1: Does your company deliver training to all of your employees or only certain functions?



ANSWER CHOICES	RESPONSES	
All employees	47.37%	9
Only certain functions	5.26%	1
Depends on the training content (e.g. code of conduct vs HCP interactions)	47.37%	9
TOTAL		19

I. RECIPIENTS, METHODS & CADENCE

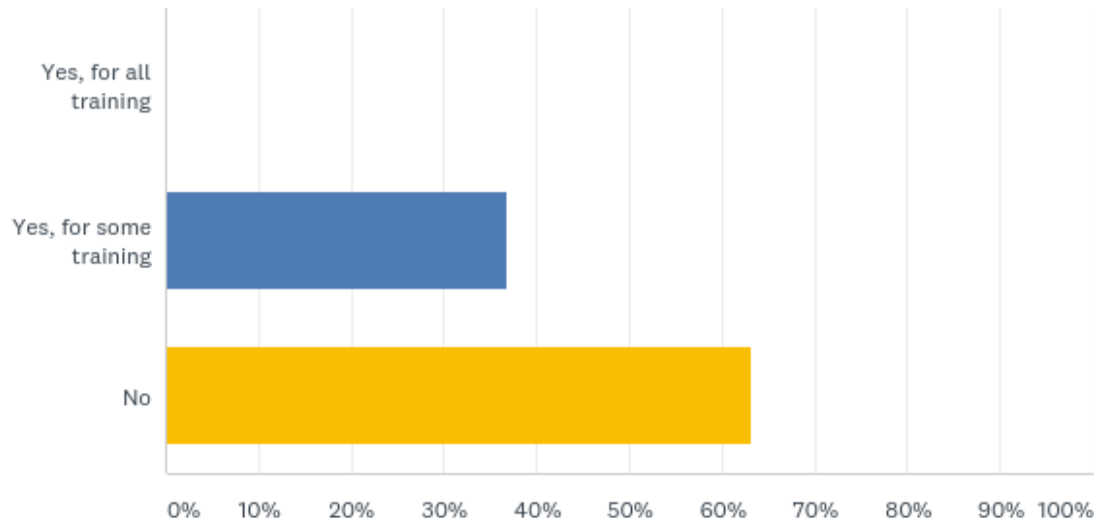
Q2: Does your company reprimand employees who do not complete training by the stated deadline?



ANSWER CHOICES	RESPONSES	
Yes	47.37%	9
No	52.63%	10
TOTAL		19

I. RECIPIENTS, METHODS & CADENCE

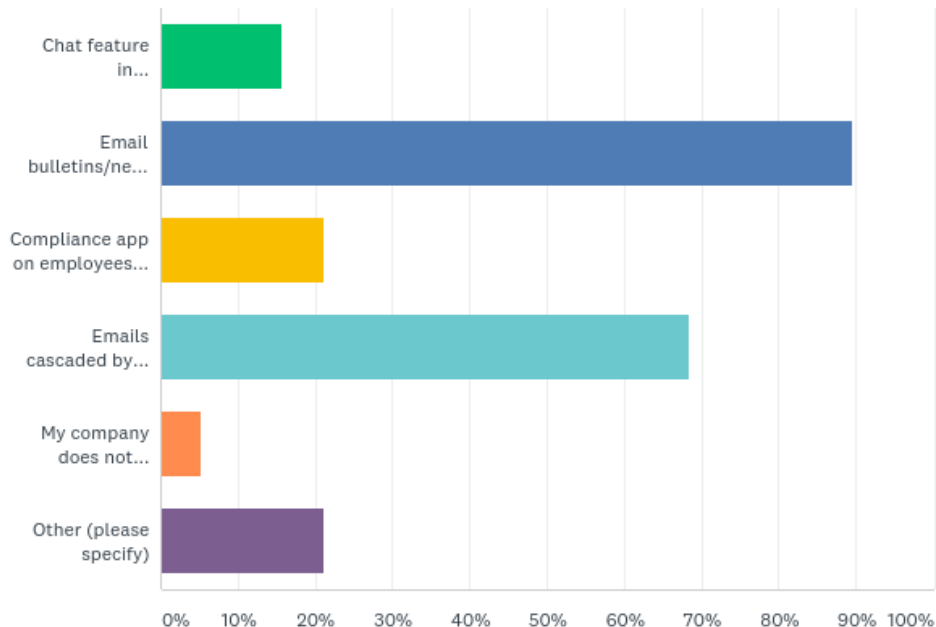
Q3: Does your company offer "test out" options, to demonstrate proficiency and help save time?



ANSWER CHOICES	RESPONSES	
Yes, for all training	0.00%	0
Yes, for some training	36.84%	7
No	63.16%	12
TOTAL		19

I. RECIPIENTS, METHODS & CADENCE

Q4: Which of the below channels does your company use for informal compliance reminders / messages?



ANSWER CHOICES	RESPONSES	
Chat feature in SalesForce.com or similar application	15.79%	3
Email bulletins/newsletters on a predetermined cadence (monthly, quarterly)	89.47%	17
Compliance app on employees' smartphone/tablet	21.05%	4
Emails cascaded by Sales, other leaders, as opposed to direct from Compliance	68.42%	13
My company does not utilize informal compliance reminders/messages	5.26%	1
Other (please specify)	21.05%	4
Total Respondents: 19		

I. RECIPIENTS, METHODS & CADENCE

Q5: Please complete the below methods/cadence matrix to indicate your company's approach to the "how & when" of delivering training to your **employees**.

	ANNUALLY	QUARTERLY	MONTHLY	WEEKLY	NEVER	TOTAL RESPONDENTS
Online pre-recorded/on-demand company training	63.16% 12	21.05% 4	0.00% 0	0.00% 0	15.79% 3	19
Live virtual remote instructor-led company training	31.58% 6	47.37% 9	15.79% 3	0.00% 0	5.26% 1	19
In-person instructor-led company training	55.56% 10	33.33% 6	16.67% 3	0.00% 0	0.00% 0	18
Company training including custom short videos	38.89% 7	33.33% 6	0.00% 0	0.00% 0	27.78% 5	18
Company training via smart phone/tablet apps	23.53% 4	17.65% 3	5.88% 1	0.00% 0	52.94% 9	17
Third-party LMS / CBT / E-Learning training	47.06% 8	35.29% 6	5.88% 1	0.00% 0	23.53% 4	17
Off-the-shelf short burst training (e.g. Real Biz Shorts)	27.78% 5	5.56% 1	5.56% 1	0.00% 0	61.11% 11	18
Read & Review	61.11% 11	33.33% 6	0.00% 0	5.56% 1	0.00% 0	18
Articles/Newsletter	5.56% 1	44.44% 8	38.89% 7	0.00% 0	11.11% 2	18
Awareness messages	10.53% 2	52.63% 10	26.32% 5	5.26% 1	5.26% 1	19

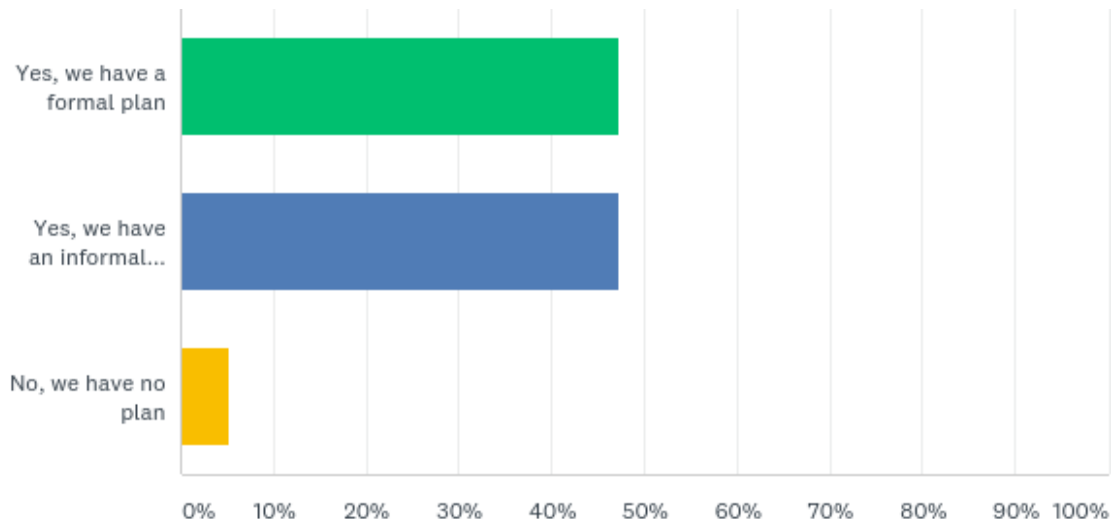
I. RECIPIENTS, METHODS & CADENCE

Q6: Please complete the below methods/cadence matrix to indicate your company's approach to the "how & when" of delivering training to your **third-party intermediaries/business partners**.

	ANNUALLY	QUARTERLY	MONTHLY	WEEKLY	NEVER	TOTAL RESPONDENTS
Online pre-recorded/on-demand company training	36.84% 7	0.00% 0	0.00% 0	0.00% 0	63.16% 12	19
Live virtual remote instructor-led company training	52.63% 10	5.26% 1	5.26% 1	0.00% 0	36.84% 7	19
In-person instructor-led company training	42.11% 8	5.26% 1	5.26% 1	0.00% 0	47.37% 9	19
Company training including custom short videos	31.58% 6	0.00% 0	0.00% 0	0.00% 0	68.42% 13	19
Company training via smart phone/tablet apps	15.79% 3	0.00% 0	0.00% 0	0.00% 0	84.21% 16	19
Third-party LMS / CBT / E-Learning training	26.32% 5	5.26% 1	0.00% 0	0.00% 0	68.42% 13	19
Off-the-shelf short burst training (e.g. Real Biz Shorts)	10.53% 2	0.00% 0	0.00% 0	0.00% 0	89.47% 17	19
Read & Review	47.37% 9	5.26% 1	5.26% 1	0.00% 0	42.11% 8	19
Articles/Newsletter	5.56% 1	22.22% 4	5.56% 1	0.00% 0	66.67% 12	18
Awareness messages	5.88% 1	29.41% 5	0.00% 0	0.00% 0	64.71% 11	17

II. PLANNING & MANAGEMENT

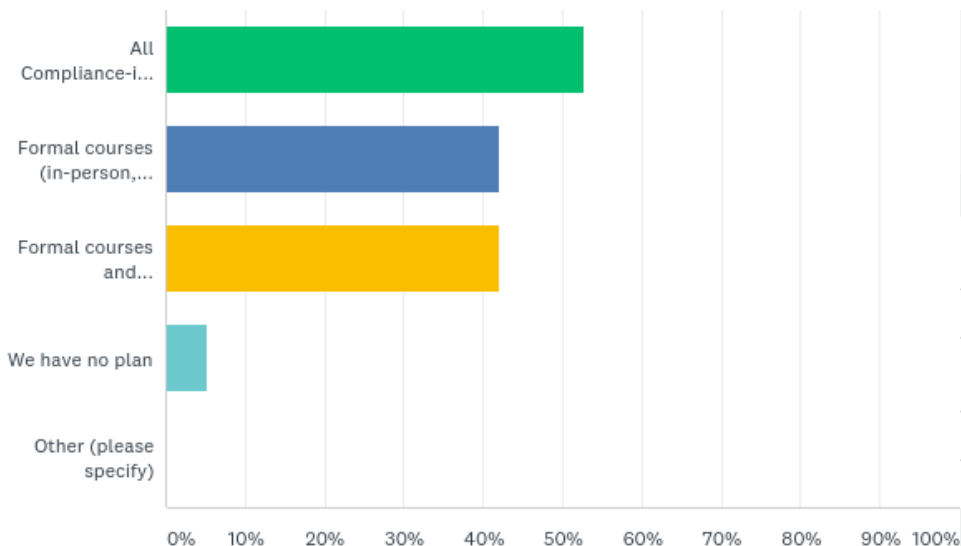
Q1: Does your company follow an annual compliance communication plan/calendar?



ANSWER CHOICES	RESPONSES	
Yes, we have a formal plan	47.37%	9
Yes, we have an informal plan	47.37%	9
No, we have no plan	5.26%	1
TOTAL		19

II. PLANNING & MANAGEMENT

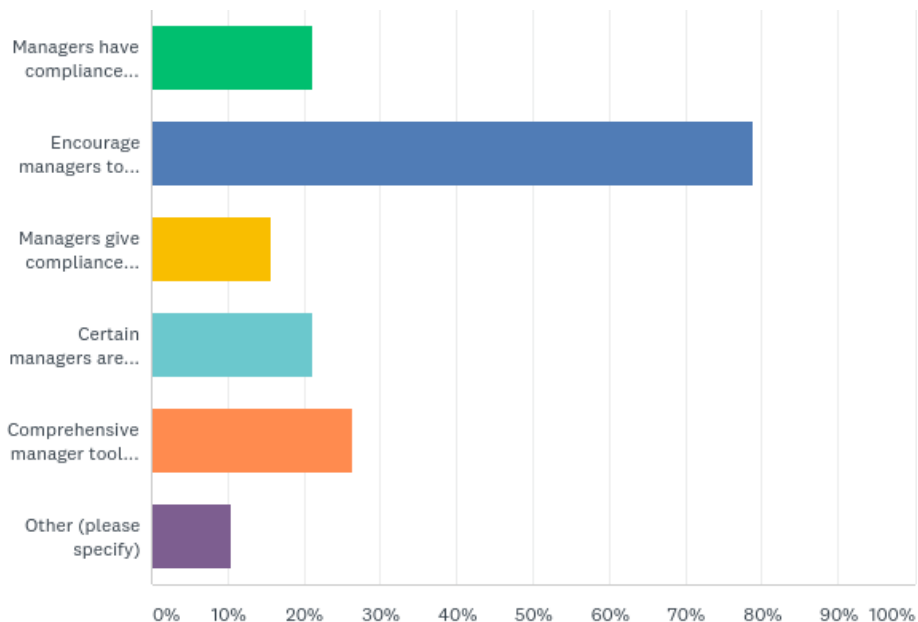
Q2: What does your company include in the scope of your annual compliance training plan?



ANSWER CHOICES	RESPONSES	
All Compliance-initiated touch points (e.g., formal courses, messages, newsletters, texts, and so forth)	52.63%	10
Formal courses (in-person, virtual, and e-learning)	42.11%	8
Formal courses and session-based presentations (e.g., national sales meetings)	42.11%	8
We have no plan	5.26%	1
Other (please specify)	0.00%	0
Total Respondents: 19		

II. PLANNING & MANAGEMENT

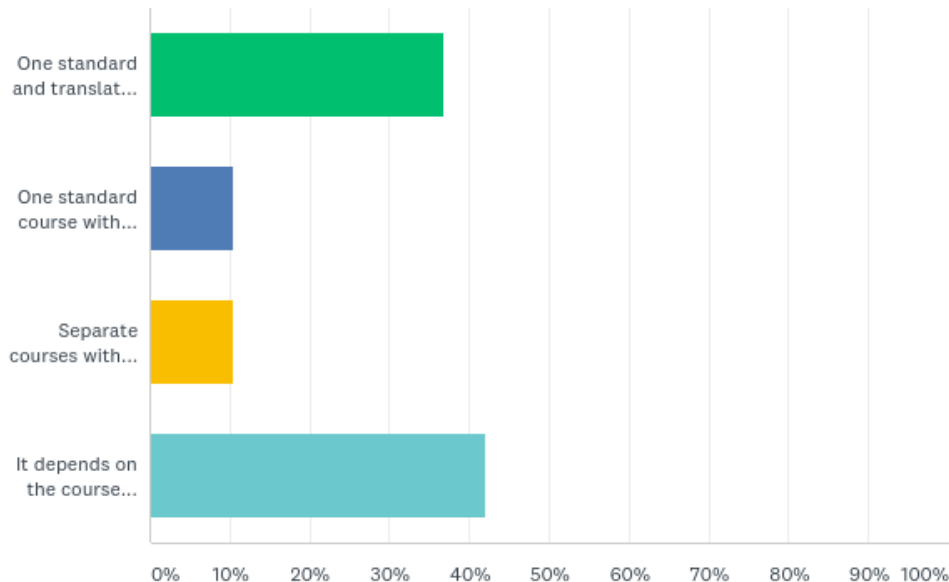
Q3: How does your department engage middle management to support compliance training with their teams?



ANSWER CHOICES	RESPONSES	
Managers have compliance goals	21.05%	4
Encourage managers to discuss compliance subjects at staff meetings and team huddles	78.95%	15
Managers give compliance training (e.g. train the trainer program)	15.79%	3
Certain managers are designated as compliance champions/ambassadors and are available to answer certain compliance questions	21.05%	4
Comprehensive manager toolkit for driving compliance discussions with their employees	26.32%	5
Other (please specify)	10.53%	2
Total Respondents: 19		

II. PLANNING & MANAGEMENT

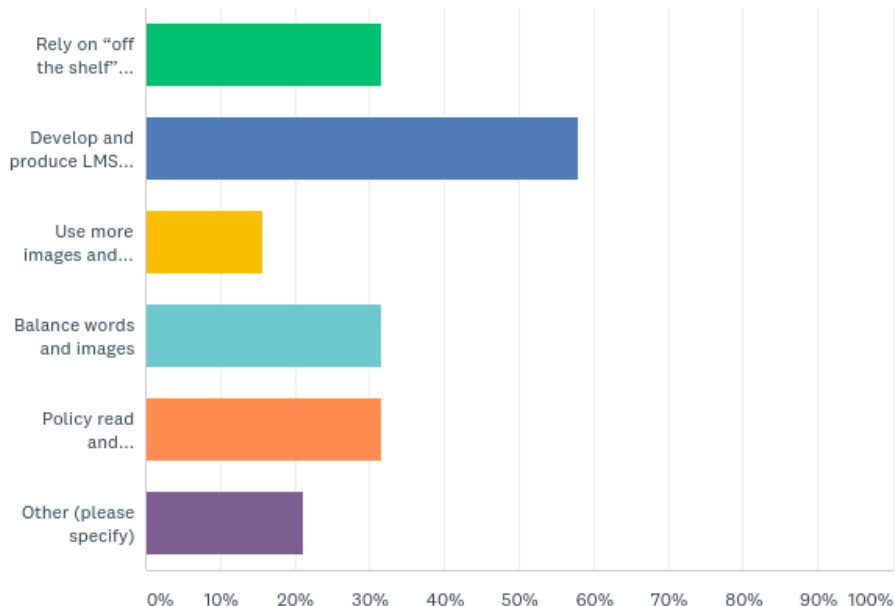
Q4: How does your company approach training courses that are assigned across multiple countries and business units?



ANSWER CHOICES	RESPONSES	
One standard and translated course	36.84%	7
One standard course with branches used for providing tailored content	10.53%	2
Separate courses with content tailored to business units and/or location	10.53%	2
It depends on the course content	42.11%	8
TOTAL		19

II. PLANNING & MANAGEMENT

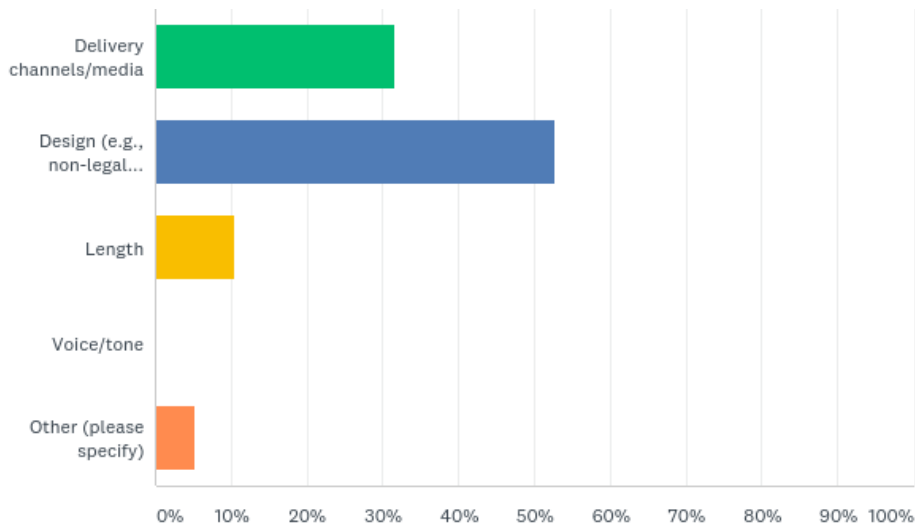
Q5: Which of the below has worked best for your company in providing effective training for a multi-lingual workforce while managing costs and administrative effort?



ANSWER CHOICES	RESPONSES	
Rely on "off the shelf" vendor training content, with minimal customization	31.58%	6
Develop and produce LMS training internally, using software like Articulate	57.89%	11
Use more images and fewer words	15.79%	3
Balance words and images	31.58%	6
Policy read and acknowledgments (i.e., no/minimal design)	31.58%	6
Other (please specify)	21.05%	4
Total Respondents: 19		

III. TOPICS, CONTENT & FREQUENCY

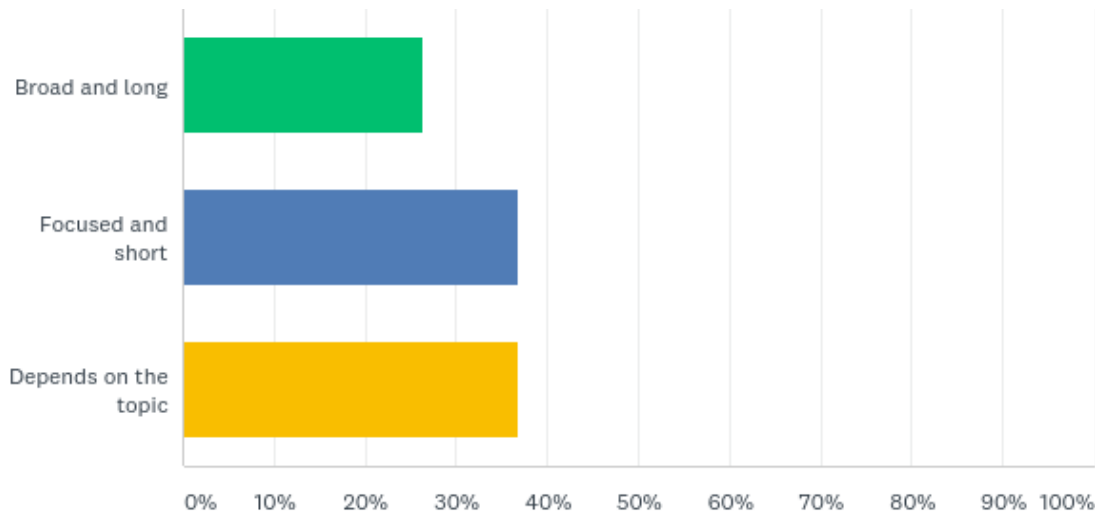
Q1: Which of the following elements is most important to focus on to “reach” all different training audiences?



ANSWER CHOICES	RESPONSES	
Delivery channels/media	31.58%	6
Design (e.g., non-legal language, use of infographics, interactivity, etc.)	52.63%	10
Length	10.53%	2
Voice/tone	0.00%	0
Other (please specify)	5.26%	1
TOTAL		19

III. TOPICS, CONTENT & FREQUENCY

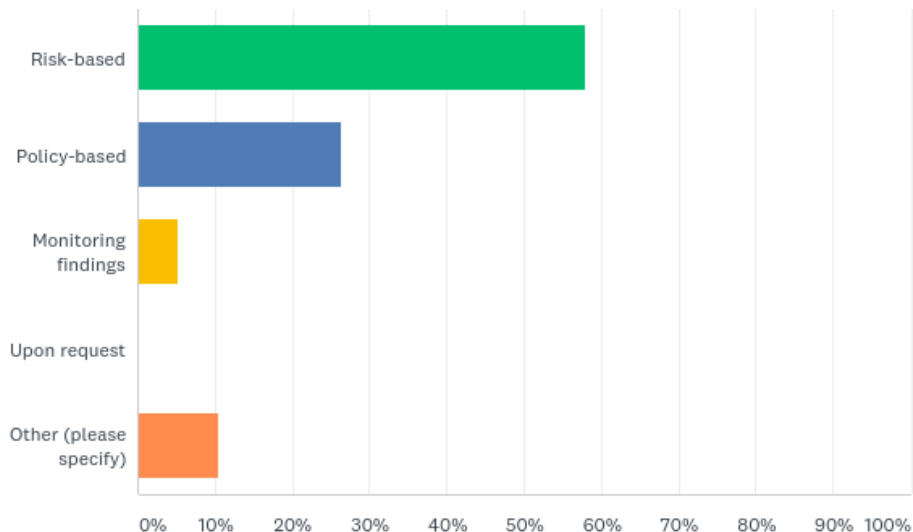
Q2: In general, are your company's trainings broad and long or focused and short?



ANSWER CHOICES	RESPONSES	
Broad and long	26.32%	5
Focused and short	36.84%	7
Depends on the topic	36.84%	7
TOTAL		19

III. TOPICS, CONTENT & FREQUENCY

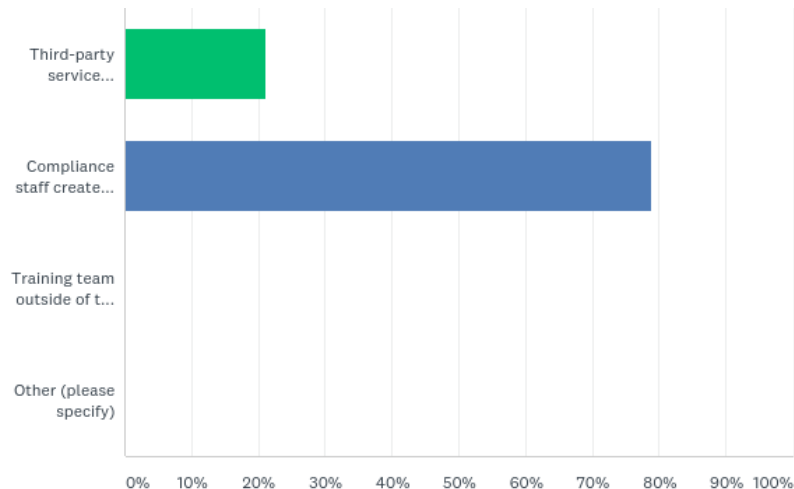
Q3: How does your company determine the topics/focus of your compliance training?



ANSWER CHOICES	RESPONSES	
Risk-based	57.89%	11
Policy-based	26.32%	5
Monitoring findings	5.26%	1
Upon request	0.00%	0
Other (please specify)	10.53%	2
TOTAL		19

III. TOPICS, CONTENT & FREQUENCY

Q4: From where does your company primarily source compliance training content?



ANSWER CHOICES	RESPONSES	
Third-party service provider with a content library	21.05%	4
Compliance staff creates own content	78.95%	15
Training team outside of the compliance department	0.00%	0
Other (please specify)	0.00%	0
TOTAL		19

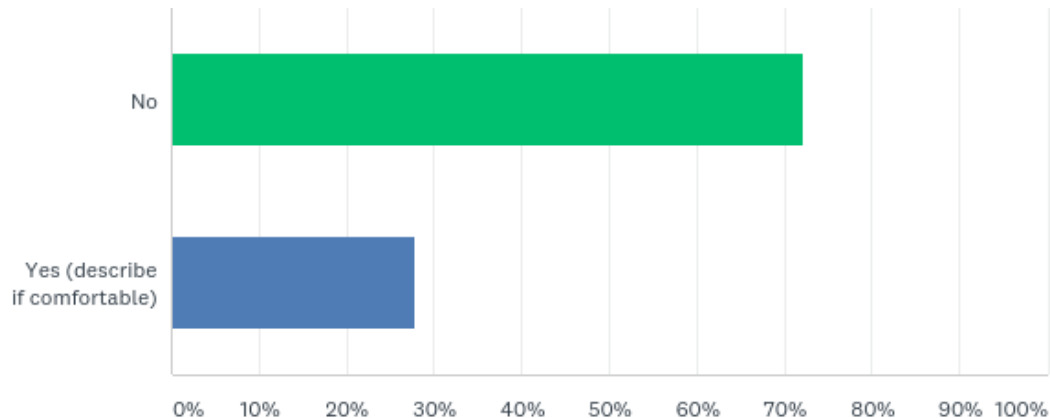
III. TOPICS, CONTENT & FREQUENCY

Q5: Please complete the below topic/cadence matrix to indicate your company's approach to the "what & when" of training.

	ANNUALLY	QUARTERLY	MONTHLY	WEEKLY	NEVER	TOTAL RESPONDENTS
AdvaMed Code of Ethics	84.21% 16	0.00% 0	0.00% 0	0.00% 0	15.79% 3	19
Company Code of Conduct	100.00% 19	0.00% 0	0.00% 0	0.00% 0	0.00% 0	19
Conflict of Interest	94.74% 18	0.00% 0	0.00% 0	0.00% 0	5.26% 1	19
Ethical Leadership	64.71% 11	23.53% 4	5.88% 1	0.00% 0	11.76% 2	17
Anti-Bribery/Kickback/Corruption	94.44% 17	11.11% 2	0.00% 0	0.00% 0	0.00% 0	18
Data Privacy	77.78% 14	0.00% 0	5.56% 1	0.00% 0	16.67% 3	18
Charitable Donations	76.47% 13	17.65% 3	0.00% 0	0.00% 0	11.76% 2	17
Travel & Expense Policy	83.33% 15	5.56% 1	0.00% 0	0.00% 0	16.67% 3	18
Off-Label Promotion	94.12% 16	11.76% 2	0.00% 0	0.00% 0	0.00% 0	17
Third-Party Intermediaries/Distributors	82.35% 14	5.88% 1	0.00% 0	0.00% 0	11.76% 2	17

III. TOPICS, CONTENT & FREQUENCY

Q6: Does your company use a go-to compliance tagline or catch-phrase on your compliance materials, emails, etc.? If yes and if comfortable sharing, please enter your tagline below.



ANSWER CHOICES		RESPONSES
No		72.22% 13
Yes (describe if comfortable)		27.78% 5
TOTAL		18

YES (DESCRIBE IF COMFORTABLE)

Integrity Matters

Let's Talk

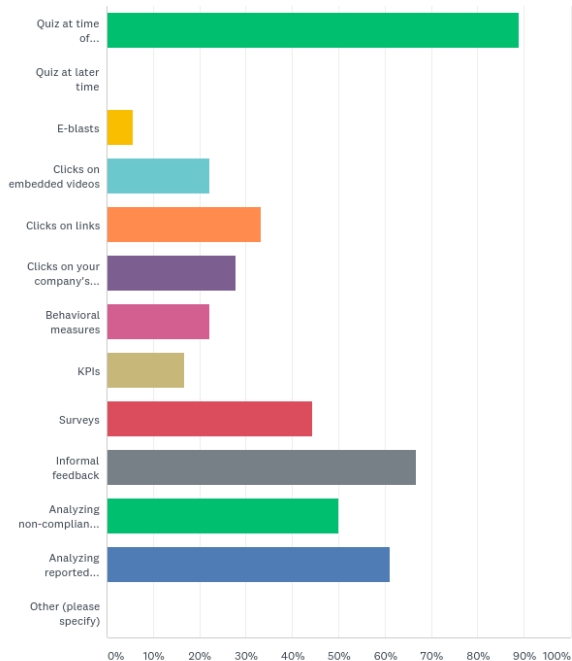
Lead with Integrity

Keep calm and compliance on

I own it

IV. MEASURING EFFECTIVENESS

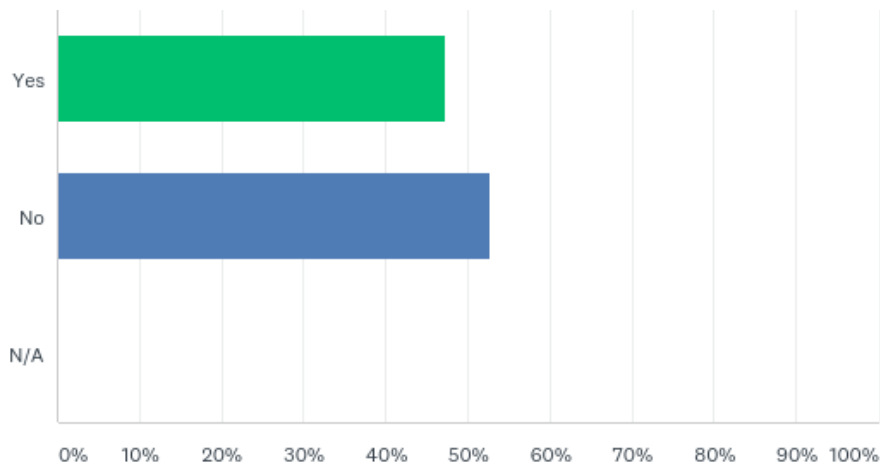
Q1: Which of the below methods does your company use to track/measure the effectiveness of your training?



ANSWER CHOICES	RESPONSES	
Quiz at time of training/closing quiz	88.89%	16
Quiz at later time	0.00%	0
E-blasts	5.56%	1
Clicks on embedded videos	22.22%	4
Clicks on links	33.33%	6
Clicks on your company's compliance intranet resources	27.78%	5
Behavioral measures	22.22%	4
KPIs	16.67%	3
Surveys	44.44%	8
Informal feedback	66.67%	12
Analyzing non-compliance policies through monitoring and auditing	50.00%	9
Analyzing reported misconduct	61.11%	11
Other (please specify)	0.00%	0
Total Respondents: 18		

IV. MEASURING EFFECTIVENESS

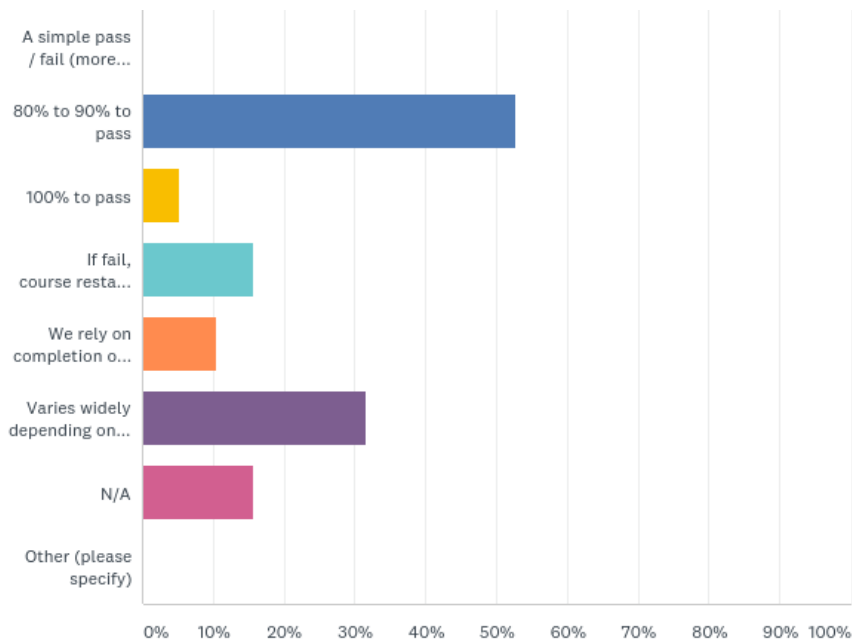
Q2: Does your company track whether employees fail and/or require multiple attempts to pass knowledge checks at the end of training?



ANSWER CHOICES	RESPONSES	
Yes	47.37%	9
No	52.63%	10
N/A	0.00%	0
TOTAL		19

IV. MEASURING EFFECTIVENESS

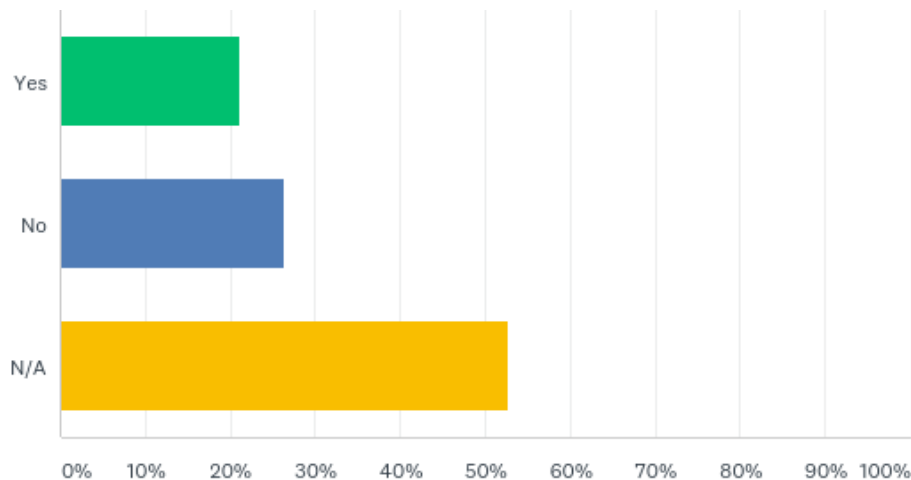
Q3: If your company includes final knowledge checks in your LMS courses, which of the below does your company's assessments typically require?



ANSWER CHOICES	RESPONSES	
A simple pass / fail (more than 60% to pass)	0.00%	0
80% to 90% to pass	52.63%	10
100% to pass	5.26%	1
If fail, course restarts with showing incorrect answers until learner answers assessment correctly	15.79%	3
We rely on completion of knowledge checks throughout the course	10.53%	2
Varies widely depending on course topic	31.58%	6
N/A	15.79%	3
Other (please specify)	0.00%	0
Total Respondents: 19		

IV. MEASURING EFFECTIVENESS

Q4: If your company monitors whether employees fail knowledge checks at the end of training, does your company use that data to inform your risk assessment?



ANSWER CHOICES	RESPONSES	
Yes	21.05%	4
No	26.32%	5
N/A	52.63%	10
TOTAL		19

COMPLIANCE IN CONVERSATION



Effective Compliance Training & Messaging

Lauren Barnett, Training & Communication Program Manager, Ethical Compliance, Varian

Katrina Belo, Communications, Policy & Training Manager, Ethics & Compliance, Roche

Mark Beyer, Head of Ethics & Integrity for North America, LivaNova

Doron Clark, Compliance Director, Training, Communications & Ethics, Medtronic

Michael Clarke, Global Chief Compliance Officer, ConvaTec

Megan Olson, Compliance Officer, North America Region, Coloplast

Pamela Panagian, Senior Manager, Communications, Training & Third-Party Compliance,
Boston Scientific

Maripat Rhoad, Director, Health Care Compliance Officer, DePuy Synthes, Johnson &
Johnson

COMPLIANCE IN CONVERSATION

Recipients, Methods & Cadence

1. Which channels does your company use for informal compliance reminders / messages? [T1]
2. What is your company's approach to the "how & when" of delivering training to your employees? [T2]
3. Have you implemented role-based or function specific training, in which specific content goes to designated groups of employees? If so, how was that implementation managed?

ANSWER CHOICES					RESPONSES	
Chat feature in Salesforce.com or similar application					15.79%	3
Email bulletins/newsletters on a predetermined cadence (monthly, quarterly)					89.47%	17
Compliance app on employees' smartphone/tablet					21.05%	4
Emails cascaded by Sales, other leaders, as opposed to direct from Compliance					68.42%	13
My company does not utilize informal compliance reminders/messages					5.26%	1
Other (please specify)					21.05%	4
	ANNUALLY	QUARTERLY	MONTHLY	WEEKLY	NEVER	TOTAL RESPONDENTS
Online pre-recorded/on-demand company training	63.16% 12	21.05% 4	0.00% 0	0.00% 0	15.79% 3	19
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Third-party LMS / CBT / E-Learning training	47.06% 8	35.29% 6	5.88% 1	0.00% 0	23.53% 4	17
Off-the-shelf short burst training (e.g. Real Biz Shorts)	27.78% 5	5.56% 1	5.56% 1	0.00% 0	61.11% 11	18
Read & Review	61.11% 11	33.33% 6	0.00% 0	5.56% 1	0.00% 0	18
Articles/Newsletter	5.56% 1	44.44% 8	38.89% 7	0.00% 0	11.11% 2	18
Awareness messages	10.53% 2	52.63% 10	26.32% 5	5.26% 1	5.26% 1	19

COMPLIANCE IN CONVERSATION

Planning & Management

1. Does your company follow an annual compliance communication plan/calendar? If so, what does your company include in its scope? [T1]
2. How does your department engage middle management to support compliance training with their teams? [T2]
3. Do you involve your CEO/CFO as a part of your compliance training strategy and communications?
4. What's worked best for your company in providing effective training for a multi-lingual workforce while managing costs and administrative effort? [T3]

ANSWER CHOICES	RESPONSES
All Compliance-initiated touch points (e.g., formal courses, messages, newsletters, texts, and so forth)	52.63% 10
Formal courses (in-person, virtual, and e-learning)	42.11% 8
Formal courses and session-based presentations (e.g., national sales meetings)	42.11% 8
We have no plan	5.26% 1
ANSWER CHOICES	RESPONSES
Managers have compliance goals	21.05% 4
Encourage managers to discuss compliance subjects at staff meetings and team huddles	78.95% 15
Managers give compliance training (e.g. train the trainer program)	15.79% 3
Certain managers are designated as compliance champions/ambassadors and are available to answer certain compliance questions	21.05% 4
Comprehensive manager toolkit for driving compliance discussions with their employees	26.32% 5
Other (please specify)	10.53% 2
ANSWER CHOICES	RESPONSES
Rely on "off the shelf" vendor training content, with minimal customization	31.58% 6
Develop and produce LMS training internally, using software like Articulate	57.89% 11
Use more images and fewer words	15.79% 3
Balance words and images	31.58% 6
Policy read and acknowledgments (i.e., no/minimal design)	31.58% 6
Other (please specify)	21.05% 4

COMPLIANCE IN CONVERSATION

Topics, Content & Testing

1. Which training elements are most important to focus on to reach all different training audiences? [T1]
2. How does your company determine the topics/focus of your compliance training, which new training topics to add and how often to add new training topics? [T2]
3. From where does your company primarily source compliance training content? [T3]
4. Have you implemented pre-testing knowledge assessments? If so, did you use a third-party vendor or developed in-house?

ANSWER CHOICES		RESPONSES
Delivery channels/media	31.58%	6
Design (e.g., non-legal language, use of infographics, interactivity, etc.)	52.63%	10
Length	10.53%	2
Voice/tone	0.00%	0
Other (please specify)	5.26%	1
ANSWER CHOICES		RESPONSES
Risk-based	57.89%	11
Policy-based	26.32%	5
Monitoring findings	5.26%	1
Upon request	0.00%	0
Other (please specify)	10.53%	2
ANSWER CHOICES		RESPONSES
Third-party service provider with a content library	21.05%	4
Compliance staff creates own content	78.95%	15
Training team outside of the compliance department	0.00%	0
Other (please specify)	0.00%	0
TOTAL		19

OPEN FLOOR

Recipients, Methods & Cadence

1. Which channels does your company use for informal compliance reminders / messages?
2. What is your company's approach to the "how & when" of delivering training to your employees?
3. Have you implemented role-based or function specific training, in which specific content goes to designated groups of employees? If so, how was that implementation managed?

Planning & Management

1. Does your company follow an annual compliance communication plan/calendar? If so, what does your company include in its scope?
2. How does your department engage middle management to support compliance training with their teams?
3. Do you involve your CEO/CFO as a part of your compliance training strategy and communications?
4. What's worked best for your company in providing effective training for a multi-lingual workforce while managing costs and administrative effort?

Topics, Content & Testing

1. Which training elements are most important to focus on to reach all different training audiences?
2. How does your company determine the topics/focus of your compliance training, which new training topics to add and how often to add new training topics?
3. From where does your company primarily source compliance training content?
4. Have you implemented pre-testing knowledge assessments? If so, did you use a third-party vendor or developed in-house?

ADJOURNMENT