

[Insert Company Name and/or Logo]

Quick Reference Guide	
Title:	Monitoring a compliance programme
Purpose:	Use this guide to perform periodic audits of your compliance programme.
Effective Date:	[Enter date]

- Consider the risk areas for your business. These will include, at a minimum, the following:
 - Meals with Healthcare Professionals (HCPs) or Government Officials
 - Gifts to HCPs or Government Officials
 - Sponsorship of HCPs to a third party educational conference or a product training meeting (sponsorship costs may include registration, travel, accommodations, etc.)
 - Grants or donations
 - Consulting payments to HCPs
 - Any other type of payment or transfer of value provided to an HCP or Government Official

- At least twice per year, pull sample payments from all of the applicable risk areas in your business. We recommend the following sample numbers:

Number of payments	Number of samples
1	1
2-5	2
6-10	3
11-25	5
26-100	10
More than 100	15

- Review the payments to ensure all key controls are met. Depending on the payment type, key controls include the following. You may wish to audit for other issues as well.

Payment type	Key controls
Meals	<ul style="list-style-type: none"> Total meal cost must be in line with per person limits All attendees must be listed on the expense report and all must have a legitimate business reason for being at the meal (no HCP guests) Business justification for the meal Appropriate location for the meal and no expenses for entertainment All expenses have appropriate receipts
Gifts	<ul style="list-style-type: none"> Gift cost must be in line with local limits Gift item must be related to the medical profession, benefit patients or serve a genuine educational function <ul style="list-style-type: none"> If not, check for additional approvals All expenses have appropriate receipts
Sponsorships to an educational event (third party or product training)	<ul style="list-style-type: none"> Travel costs must be in line with local policy and industry code <ul style="list-style-type: none"> Ensure any business class air travel is acceptable

Payment type	Key controls
	<ul style="list-style-type: none"> • Hotel must be modest and the number of nights paid for are reasonable based on the dates of the event • Charges for spas, golf, etc. are prohibited • Any HCP out-of-pocket expenses (taxi, etc.) include receipts and are in line with local policy • Employer notification / approval requirements were met • The proper internal approvals were received • All expenses have appropriate receipts
Grants or donations	<ul style="list-style-type: none"> • Payment must be to an acceptable entity <ul style="list-style-type: none"> ○ Payment can never to be an individual HCP • The funding agreement must be documented in writing • The proper internal approvals were received
Consulting payments	<ul style="list-style-type: none"> • Payments are fair market value for the service • There is a contract with the HCP documenting the service that will be provided, and there is a legitimate business need for that service • The HCP submits documentation proving he did the work • Any required travel, accommodation, meal, etc. expense are in line with local policy

4. Take corrective action on any findings of non-compliance. Corrective action may include:
 - Training on requirements
 - Policy clarifications or a new policy
 - Disciplinary action for repeat offenders or serious acts of non-compliance
5. Keep records of your monitoring results.