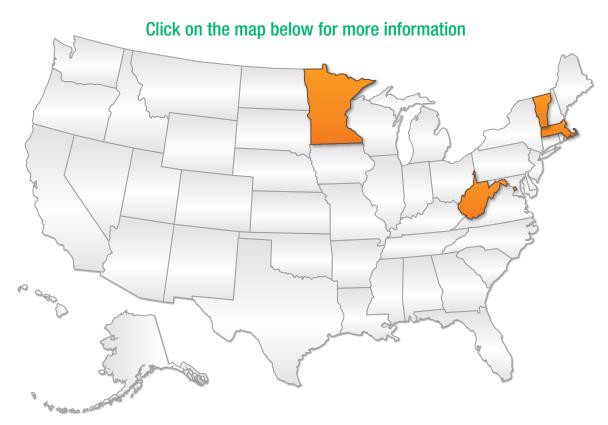


TRANSPARENCY REQUIREMENTS

Commencing in 2012, pharmaceutical companies are required to track and report certain expenditures and transfers of value to all physicians and teaching hospitals. In addition to this Federal requirement, several states have laws that require reporting, which may also impact your interactions with health care providers.



Federal Reporting Requirements For Pharmaceutical Companies:

All 50 US States plus the District of Columbia

Jurisdictions with Additional Reporting Requirements*:

DC MA MN VT WV

*These Jurisdictions also require Federal Reporting

ADDITIONAL RESOURCES

Legislative Watch Interactive Map https://www.medispend.com/legislativemap

MediSpend[™] Blog https://www.medispend.com/blog MediSpend[™] Resource Center https://www.medispend.com/resources

MediSpend Twitter Updates: https://twitter.com/medispend

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Transparency Requirements by Jurisdiction

Updated 1/06/12

While the state and Federal requirements are exclusive, the following summarizes specific areas that are likely to affect your day-to-day interactions with health care providers. Please note that the nomenclature used is based upon the language specified in each statute.

All Jurisdictions:		Minnesota:		West Virginia:	
Who:	Physicians	Who:	Practitioners	Who:	Prescribers (Physicians and Other Health Care Professionals Licensed to Practice)
	Teaching Hospitals	Reported:	Travel		
Reported:	Food or Beverage		Honoraria		
	Gifts	Threshold:	> \$100	Reported:	Meals
	Travel				Gifts
	Entertainment				Travel
Threshold:	\geq \$10 (unless the aggregate annual total is > \$100)			Threshold:	> \$100

District of Columbia:		Massachusetts:		Vermont:	
Who:	Health Care Professionals	Who: Reported: Threshold:	Physicians	Who:	Physicians
	Plans		Pharmacists		Pharmacists
	Pharmacies		Hospitals		Hospitals
	Hospitals		Nursing Homes		Nursing Homes
	Nursing Facilities		Health Plan Administrators		Health Plan Administrators
	Clinics		Health Care Practitioners		Anyone Authorized to Prescribe, Dispense or Purchase Prescription Drugs or Devices
	Other Entities Licensed to Provide Health Care		Anyone Authorized to Prescribe, Dispense or Purchase Prescription Drugs or Devices		
Reported:	Meals				-
	Gifts		-		Educational Materials
	Travel		Meals		Samples
	Entertainment		Travel		Coupons, vouchers or discount cards
	Educational Materials		≥ \$50		Travel
Threshold:	> \$25	Banned:	Gifts		
				Threshold:	≥ \$25
				Banned:	Meals
					Gifts