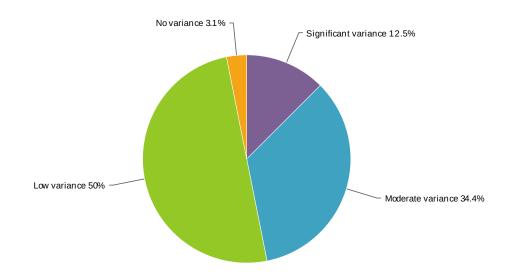
New Summary Report - 09 May 2014 Survey: Phase 1 Open Payments Submission: An Industry Assessment

1. Please enter your job title:

Count	Response
1	Associate Director
1	Associate Director, Ethics and Compliance
1	Business Development Manager
1	Compliance
1	Compliance Director
3	Compliance Manager
1	Compliance Officer
1	Corporate Compliance Manager
1	Deputy Corporate Compliance Officer
1	General Counsel
1	Global Compliance Leader (also Counsel)
1	Global Spend Transparency Head
1	Legal Counsel
1	Paralegal & Compliance Specialist
1	Senior Manager
1	Sr Business Analyst - Aggregate Spend
1	Sr. Director, Corporate Compliance
1	VP, Compliance Management
1	Vice President
1	regulatory compliance manager

2. Do you expect any variances between Phase 1 and Phase 2 reporting?

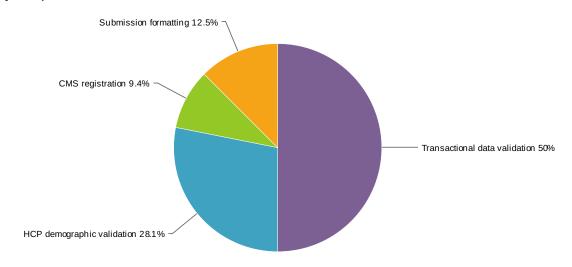


12.5% Significant variance 4 Moderate variance 34.4% 11 Low variance 50.0% 16 No variance 3.1% 1 0.0% 0 I don't know Total 32

Statistics

Total Responses 32

3. Where did you spend the most time on Phase 1 submission?



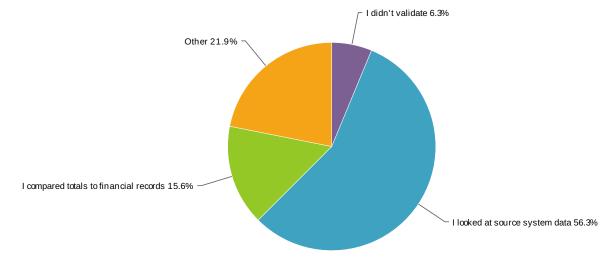
Transactional data validation	50.0%	16
HCP demographic validation	28.1%	9

Statistics

Total Responses 32

CMS registration	9.4%	3
Submission formatting	12.5%	4
Re-submission of data	0.0%	0
	Total	32

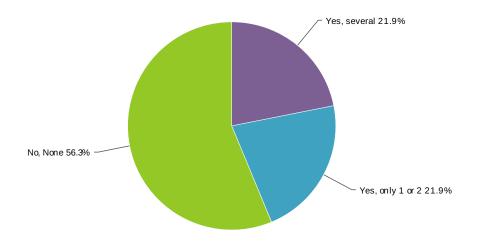
4. How did you validate your data for accuracy?



I didn't validate	6.3%	2
I looked at source system data	56.3%	18
I compared totals to financial records	15.6%	5
I only confirmed with recipients having the highest spend	0.0%	0
Other	21.9%	7
	Total	32

Statistics	
Total Responses	32

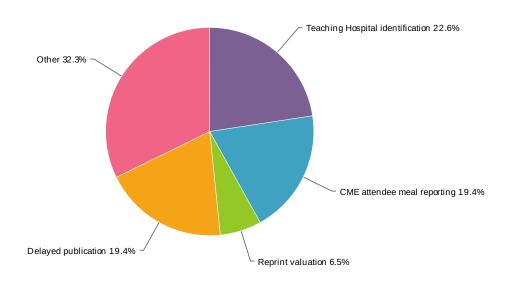
5. Were there any specific payments discovered that raised compliance concerns or necessitated significant follow-up?



Yes, several	21.9%		7
Yes, only 1 or 2	21.9%		7
No, None	56.3%		18
		Total	32

Statistics Total Responses 32

6. What is the biggest outstanding area of confusion remaining for capturing/reporting data?

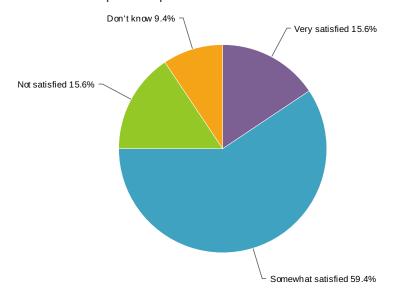


Teaching Hospital identification	22.6%	7
CME attendee meal reporting	19.4%	6
Reprint valuation	6.5%	2
Delayed publication	19.4%	6

Statistics

Total Responses	31

7. How satisfied are you with covered recipient demographic data completeness in your reporting/submission, either through a customer master or spend capture method?

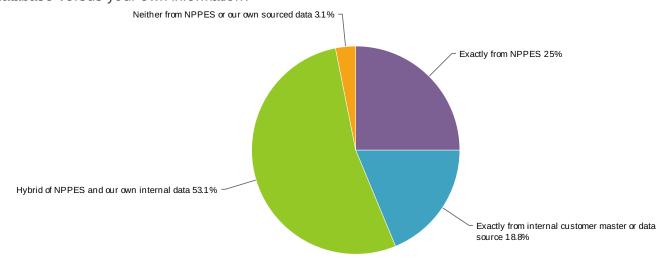


Very satisfied	15.6%	5
Somewhat satisfied	59.4%	19
Not satisfied	15.6%	5
Don't know	9.4%	3
	Total	32

Statistics

Total Responses 32

8. Have you already and/or are you planning on reporting physician data as found exactly in the NPPES database versus your own information?

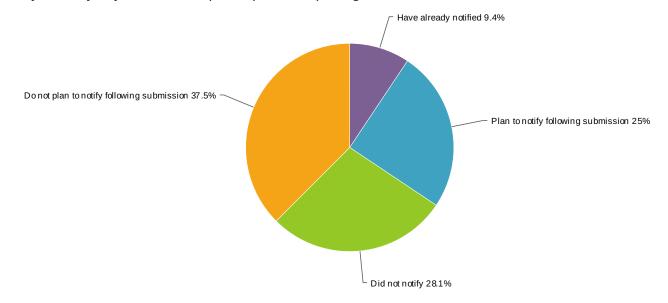


Exactly from NPPES	25.0%	8
Exactly from internal customer master or data source	18.8%	6
Hybrid of NPPES and our own internal data	53.1%	17
Neither from NPPES or our own sourced data	3.1%	1
	Total	32

Statistics

Total Responses 32

9. Did you notify any covered recipients prior to reporting/submission of data in Phase 1?

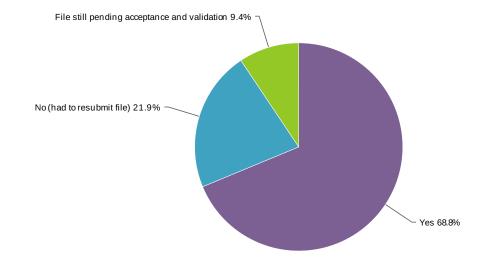


Have already notified	9.4%	3
Plan to notify following submission	25.0%	8
Did not notify	28.1%	9
Do not plan to notify following submission	37.5%	12
	Total	32

Total Responses	32

Statistics

10. Was the Phase 1 file accepted and validated upon first attempt at submission?



Yes	68.8%	22
No (had to resubmit file)	21.9%	7
File still pending acceptance and validation	9.4%	3
	Total	32

Statistics

Total Responses	32