

# Sales Insight

by Christina Garofano and Wendy Heckelman

## Inspect What You Expect

Field-based monitoring programs can help companies avoid problems before they start

**B**iopharmaceutical companies need to proactively monitor compliance trends to keep themselves in safe harbor and avoid damaging prosecutions and fines. Corporate Integrity Agreements (CIAs) are one source of information on what the government considers acceptable procedures for Sales Field Conduct. For example, recent CIAs with AstraZeneca, Pfizer, Novartis, and Forest, all contain requirements for Field Based Monitoring (FBM) of sales conduct.

### Utilizing FBM for Sales Performance Improvement

Some companies see FBM as a burden, especially sales leaders; however, FBM programs can be used to monitor more than compliant behavior. FBM can monitor sales performance as well as compliance standards. Companies can further maximize their return on investment in FBM by ensuring they have behavioral training in place. This ensures field representatives know how to translate standards into performance in the field and then monitor for follow-up. A FBM program can provide value to both compliance and sales organizations by following a few simple steps.

First, create behavioral standards that meet both compliance and sales performance requirements. These should be product specific, if possible, so the company can provide explicit expectations and guidance to field representatives. If compliance and sales organizations partner to create these behavioral standards, they can provide direction to field representatives on what they can do, not just what they can't do. In addition, if behavioral standards are created for

medical-to-medical conversations, FBM can also be used to monitor and enhance these interactions, and limit any potential risks.

Second, provide behavioral based training on these expectations. This is an extremely important and often overlooked component in compliance training delivery. Traditional compliance training is usually an online knowledge transfer exercise that re-

views a litany of regulations. Research shows that knowledge-based training is minimally effective at changing behavior because learners don't know how to apply the knowledge. To create behavior change that lasts, companies need explicit behavioral instruction with an opportunity for learners to practice and obtain feedback.

### Partnering with Compliance

When compliance and sales organizations partner to produce behavioral training, it also helps reduce the stigma associated with compliance training and makes it more likely that the standards will be translated into field behaviors.

Companies should monitor field behavior using the behavioral standards or "inspect what you expect." By comparing field behavior against these standards, the company can monitor more than just compliance with regulations. They can gauge the effectiveness of sales training, the delivery of marketing messages in the field, and adherence to performance standards.

The final step is to combine FBM efforts with real time reporting and follow-up procedures so the company can react to data findings. With efficient reporting systems, the company can monitor risks and promptly address any compliance and/or performance gaps through coaching, remedial actions, etc. Follow-up procedures enable the company to close the loop on potential compliance violations and performance issues. [PR](#)

## Field Based Monitoring

These steps enable biopharmaceutical companies to proactively institute a FBM program that keeps them in safe harbor and achieves additional advantages. The steps include:

- Providing guidance to field representatives on what they can do, not just what they can't do.
- Enabling monitoring of field behavior for the effectiveness of sales training, the delivery of marketing messages in the field, and adherence to performance standards.
- Monitoring and enhancing medical-to-medical conversations if behavioral standards are created for these as well.
- Changing the perception and value of compliance training efforts.
- Closing the loop on potential compliance violations and performance issues through effective reporting processes and systems.



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