

PROGNOS ALERTS PROGRAMS VS SPONSORED TESTING PROGRAMS CASE STUDY

Prognos HCP Alerts utilizes anonymized patient data to identify HCPs with brand-eligible patients, enabling precise and compliant pharmaceutical marketing. Unlike sponsored testing programs, Prognos adheres to OIG guidelines, mitigating fraud and abuse risks. This case study highlights how Prognos Alerts ensures ethical HCP engagement by avoiding free services, prohibiting data use in sales pitches, and functioning solely as an educational tool, ultimately facilitating timely interventions and improved patient outcomes.

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Prognos HCP Alerts Background

Prognos has been providing daily and weekly HCP level alerts for more than a decade. With more than 30 Pharma clients across +80 Brands, the Prognos alerts program is an essential program to support brand sales and marketing initiatives across rare disease, enabling messaging and education to HCPs with brand eligible patients. It is important to note that Prognos' program is not a sponsored testing program. All data is anonymized de-identified data that is certified by a third party expert as required by 45 C.F.R. 164.514(b)(1).

It's important to distinguish the Prognos Alerts Program from sponsored testing programs. Key differences ensure ethical and compliant HCP engagement. The OIG Advisory Opinion No. 22-06 (April 11, 2022) outlines criteria for minimizing fraud and abuse risks in such programs. Prognos Alerts aligns with these criteria:

Low risk of overutilization or inappropriate utilization

In the OIG opinion, which focused on sponsored testing, they still found this criteria to be met because, among other factors, it is not medically appropriate for a physician to prescribe the drug to patients who have not been diagnosed with the disease and the requestor does not promote the drug for patients who have not been diagnosed with the disease. *With Prognos Alerts, you will only be provided with HCPs that have patients that meet the agreed-upon medical profile.*

Unlikely to skew clinical decision-making or create quality-of-care issues

The OIG found that this was the case because the requestor does not otherwise incentivize or require providers who order tests through the program to recommend, prescribe, or administer any products manufactured by the Requestor. *As you know, this is best industry practice to not incentivize providers to prescribe certain medications but only to provide them with the educational materials about the medication. We would assume this is already the practice with your sales force.*

Safeguard against use as a sales or marketing tool

One important aspect that the OIG relied on was that the requestor in the OIG opinion did not have access to identified data. *The Prognos Alerts program uses only anonymized de-identified data that is certified by a third party expert as required by 45 C.F.R. 164.514(b)(1)*



Distinguishing Prognos Alerts from Sponsored Testing Programs

The Ultragenyx Settlement occurred in December of 2023 making it the first major enforcement action after the OIG opinion. But there are significant differences between the findings in Ultragenyx and the Prognos Alerts Program.

For one, Ultragenyx paid the lab to conduct these genetic tests at no cost to physicians and provided the results to the physician. *With Prognos Alerts, the physicians are not receiving any free service. The lab results are being used only to target which HCPs your sales force should approach for education and messaging.*

Ultragenyx sales personnel discussed its testing program with physicians. *In the Prognos Alerts program we contractually prohibit our clients from speaking to HCPs about the data. The data is used only to target certain providers for messaging and education. It may not be used as part of any sales pitch.*

Ultragenyx disseminated the results reports to its sales force. *Prognos recommends only providing the sales force with a list of HCPs to target. There is no need to send data to the sales force.*

Conclusion

Prognos HCP Alerts provides a valuable tool for pharmaceutical companies seeking to ethically and compliantly engage HCPs in the rare disease space. By leveraging anonymized patient data and adhering to strict ethical guidelines, Prognos Alerts enables precision targeting that supports informed clinical decision-making, fosters appropriate resource utilization, and ultimately contributes to improved patient outcomes.

