

Prescribed Product Disclosures:
Report of Vermont Attorney General William H. Sorrell for Fiscal Year 2010
April 1, 2011

I. Summary

This is the eighth report of Vermont Attorney General William H. Sorrell on Prescribed Product Disclosures. It is based upon disclosures of payments made during the period of July 1, 2009, through June 30, 2010 (“FY10”), by manufacturers of pharmaceutical, biologic and medical device products. Vermont’s Prescribed Product Disclosure Law, 18 V.S.A. §§ 4631a, 4632, required manufacturers to file disclosures with the Vermont Attorney General’s Office by October 1, 2010, and requires the Vermont Attorney General to issue a report about the disclosures by April 1, 2011.

This report reflects the substantial amendments made to Vermont’s law in 2009. Among other changes, the amendments largely prohibit manufacturers from giving gifts to health care providers and require reporting by manufacturers of biologics and medical devices as well as reporting by pharmaceutical manufacturers, which has been mandated since 2002. The amendments also require clinical trial and research expenditures to be reported. Further, the amendments eliminated the trade secrets exemption to public disclosure. As a result, all information submitted to the Attorney General’s Office for FY10 has been posted along with this report on the Attorney General’s Website: www.atg.state.vt.us.¹

To some extent, these changes in the law complicate cross-year comparison. For example, the expanded definition of manufacturer and the new requirement that clinical trial and research expenditures be reported means that the FY10 reporting captures more of the dollars spent on health care than in prior years. Thus, comparison with prior years’ exclusively pharmaceutical and exclusively marketing-related data is difficult. Moreover, both the ban on gifts and the elimination of trade secret protection may have caused manufacturers to decrease the amount of money they spent on marketing products to Vermont health care providers. Notably, the ban includes food, which accounted for over \$800,000 in expenditures in both FY08 and FY09. Further, for the first time in FY10, the Attorney General’s Office allowed manufacturers to report certain expenditures in the aggregate, so that some expenditures that would have, in the past, been attributed to a health care provider or institution, were not reported in connection with a specific recipient for FY10. This may account for some apparent decrease in expenditures to certain recipient groups.

¹ This report does not reflect the 2009 amendment requiring manufacturers to disclose information regarding the distribution of samples of prescribed products, however. That amendment applies to the distribution of samples made on and after January 1, 2011, and will be reflected in future prescribed product reports.

Manufacturers and Expenditures

According to the FY10 disclosures, 141 manufacturers reported spending approximately 4.8 million dollars in direct payments to Vermont health care providers, institutions and organizations. Exhibit 1. Expenditures on pharmaceutical products accounted for approximately 4 million of those dollars, and were made by 58 manufacturers. Exhibits 1 and 4.

Expenditures for pharmaceuticals dominated in both the percent of total dollars reported (80% as compared with 11% for biologics and 9% for medical devices) and the percent of the total number of expenditures (68% as compared with 7% for biologics and 25% for medical devices). Exhibit 2.

The FY10 pharmaceutical expenditure total of roughly 4 million dollars appears to represent a return to the level of spending reported in FY04. Exhibit 3. However, excluding payments made on clinical trials and research puts FY10 expenditures at approximately 1.8 million dollars, a decrease in pharmaceutical marketing expenditures from prior reported levels, which ranged from approximately 2.2 million dollars in FY05 to roughly 4 million dollars in FY04. Exhibits 3 and 7. The number of manufacturers reporting pharmaceutical expenditures for FY10 (58) dropped nearly to the level reported in FY04 (55), and the total number of expenditures is down from a high of 15,880 in FY08 to 3,122, a decrease of over 80%. Exhibits 4 and 5.

The five manufacturers with the highest total expenditures to Vermont health care providers, institutions and organizations during FY10 were:

- Pfizer
- GlaxoSmithKline
- Novartis Pharmaceuticals
- Daiichi Sankyo
- Eli Lilly

Of these, Eli Lilly and Pfizer were in the top five manufacturers for all three of the previous fiscal years, Novartis Pharmaceuticals for two of the last three fiscal years, and GlaxoSmithKline for one of the prior three fiscal years. Only Daiichi Sankyo appears in the top five for the first time in FY10. Exhibit 6.

The percentage of payments reported by the top five manufacturers, as compared with the total amount of expenditures reported, was 47% in both FY09 and FY10. However, the proportion of pharmaceutical expenditures made by the top five manufacturers increased from 47% in FY09 to 57% in FY10. Exhibit 6.

Recipients

Approximately half of the expenditures made in FY10, or 2.4 million dollars, went to clinical trials and research. Of the balance, recipients of the highest percentage of expenditures in FY10 were physicians (34%), followed by recipients in the aggregate (24%), professional, educational, or patient organizations (21%), and academic institutions (13%). Exhibit 7.

Excluding expenditures made in connection with clinical trials, the number of physicians receiving \$3,000 or more dropped from 104 in FY08 and 102 in FY09 to 39 in FY10, a total

decrease of approximately 63%. The greatest amount of expenditures to the 39 physicians who received \$3,000 or more in FY10 went to psychiatrists, who were the top recipients in both FY08 and FY09 as well. However, expenditures to psychiatrists receiving \$3,000 or more have dropped from a high of nearly \$397,000 in FY08 to approximately \$151,000 in FY10, a decrease of roughly 62%. In addition to psychiatry, physicians who received \$3,000 or more individually and over \$50,000 as a group identified their specialties as: neurology, geriatric medicine, osteopathic physician, and medical oncology. Of those, only neurology was among the top five specialties in FY09. Exhibit 8.

Excluding expenditures associated with clinical trials, the largest amount of expenditures associated with any single individual recipient in FY10 was approximately \$69,000, of which nearly \$59,000 was for faculty honoraria and expenses. The total expenditures for that individual are about 41% lower than the total received by the recipient with the highest expenditures in FY09, who received nearly \$117,000. The top individual recipient in FY09 was a psychiatrist; in FY10, the top recipient was a doctor of geriatric medicine. Exhibit 9.

In FY10, five nurses (RNs and APRNs) received \$3,000 or more each, for a total of roughly \$53,000. The FY10 expenditures to the top nurses constituted approximately half of what 10 nurses received in FY08 and 46% of what 12 nurses received in FY09. Exhibit 10.

Products

Fifty-two products were associated with over \$10,000 each in expenditures in FY10. Of those, 37 (71%) were pharmaceutical products, 8 (15%) were biologic products, and 7 (13%) were medical devices. The top five products for FY10, and their manufacturers and indications, were as follows:

<u>Product</u>	<u>Manufacturer</u>	<u>Primary Indication per FDA</u>
• Cymbalta	Eli Lilly	Depression, Anxiety
• Strattera	Eli Lilly	Attention-Deficit/Hyperactivity Disorder
• Velcade	Millennium Pharmaceuticals	Multiple Myeloma
• Victoza	Novo Nordisk	Type 2 Diabetes
• Maxalt	Merck, Schering and MSP	Migraines

The top five products of FY10 were all pharmaceutical, and accounted for approximately \$335,000 in spending, or approximately 29% of the spending attributable to the 52 products associated with over \$10,000 each in expenditures. Exhibit 11.

Looking only at the 50 products with the greatest expenditures, approximately 14% of those expenditures, or roughly \$152,000, were associated with drugs used for treating Type 2 Diabetes or both Type 1 and Type 2 Diabetes. That amount represents a 62% decrease from the nearly \$403,000 spent on marketing pharmaceuticals with the same indications in FY08. Expenditures for products with the second and third most prevalent indications in FY10 have also decreased significantly; expenditures on products used to treat depression and/or anxiety were down 63% from FY09, and expenditures on products used to treat Attention-Deficit/Hyperactivity Disorder were down 48% from FY08. Moreover, FY10 expenditures on products used to treat hypertension constituted less than 10% of FY08 expenditures on like products. Exhibit 12.

Nature and Purpose of Expenditure

Approximately 85% of all expenditures in FY10 were in the form of cash or check to recipients, a proportion that has increased from the roughly 59% and 54% reported in FY08 and FY09, respectively. In FY08 and FY09, approximately 30% of expenditures were in the form of food, while in FY10, manufacturers reported spending under \$9,000 (or less than .2%) on food. Roughly 11% – or nearly \$535,000 – of FY10 expenditures took the form of educational materials. Exhibit 13.

Manufacturers reported that the purpose of roughly 1.9 million dollars (or 40%) of FY10 spending was for clinical trials. Manufacturers also reported spending more than \$500,000 each for purposes of providing education to or for the benefit of patients (12%), for research-oriented activities (11%), and for other purposes (11%), such as fair market value payments, consulting, and grants (for a combined 9% of the overall total, or 82% of the expenditures with a reported purpose of “other”). Exhibit 14.

II. Description of Vermont’s Prescribed Product Disclosure Law

The Vermont Legislature enacted the Pharmaceutical Marketing Disclosure Law in 2002, and amended it in 2004, 2005, 2006, and 2007. In 2009, with the addition of mandatory reporting for expenditures on biologics and medical devices as well as expenditures relating to clinical trials and research, it became the Prescribed Products Disclosure Law. Additional amendments to the law have been proposed in the current legislative session, and, as of the date of this report, are still pending in the legislature.

The law in effect for the expenditures described in this report required manufacturers of prescribed products to report to the Vermont Attorney General’s Office “the value, nature, purpose, and recipient information” of permissible payments made to Vermont health care providers and institutions. 18 V.S.A. § 4632(a)(1).

As described in the summary, the law changed dramatically in 2009 to ban many kinds of expenditures. In particular, the law bans manufacturers from giving gifts, defined generally as “anything of value provided to a health care provider for free.” 18 V.S.A. §§ 4631a(a)(5), (b)(1). Only the allowable expenditures and permitted gifts detailed as follows are exempt from this ban:

Allowable Expenditures:

- some payments associated with qualifying conferences or seminars
- some expenditures associated with qualifying clinical trials and research projects
- payment or reimbursement of reasonable expenses associated with technical training on medical devices
- royalties and licensing fees

- other reasonable economic benefits provided at fair market value

18 V.S.A. § 4631a(a)(1).

Permissible Gifts:

- samples of prescribed products for free distribution to patients
- short-term loans of medical devices
- reasonable quantities of medical device demonstration or evaluation units
- educational materials
- scholarships for medical students, residents and fellows to attend qualifying conferences or seminars
- rebates and discounts for prescribed products provided in the normal course of business
- FDA-approved drug labels

18 V.S.A. § 4631a(b)(2).

For purposes of FY10, the following kinds of permissible marketing expenditures were exempt from disclosure:

- royalties and licensing fees
- rebates and discounts for prescribed products
- certain payments relating to clinical trials
- samples of prescribed products for free distribution to patients

18 V.S.A. §§ 4632(a)(1)(A), (a)(1)(B).

In addition, in 2009, the legislature eliminated the trade secret exemption which manufacturers had been permitted to claim in the past. *See* 18 V.S.A. § 4632(a)(5). Consequently, the data submitted to the Attorney General's Office, and which formed the basis of this report, is available to the public on the Attorney General's Website: www.atg.state.vt.us.

Exhibit 1 : Expenditures by Manufacturer, FY10

Rank	Manufacturer	Expenditure Total	Pharmaceutical Expenditure Total	Minimum Expenditure	Maximum Expenditure	Number of Expenditures	Number of Pharmaceutical Expenditures	Number of Biologic Expenditures	Number of Medical Device Expenditures	Number of Recipients
1	Pfizer	\$574,618.70	\$574,618.70	\$1.00	\$81,021.40	166	166			49
2	GlaxoSmithKline	\$549,802.00	\$549,802.00	\$12.00	\$77,891.00	187	187			18
3	Novartis Pharmaceuticals	\$499,709.02	\$499,709.02	\$9.00	\$34,237.00	112	112			13
4	Daiichi Sankyo	\$366,668.82	\$366,668.82	\$64.05	\$338,000.00	18	18			8
5	Eli Lilly and Company	\$275,656.55	\$275,656.55	\$0.00	\$8,816.70	279	279			20
6	Merck, Schering and MSP	\$251,856.31	\$251,856.31	\$0.41	\$58,033.44	213	213			72
7	EMD Serono	\$206,733.31		\$46.83	\$90,000.00	17		17		5
8	Allergan	\$183,454.37	\$177,539.66	\$0.08	\$100,000.00	24	20		4	13
9	Shire Pharmaceuticals	\$178,722.11	\$178,722.11	\$25.00	\$15,473.27	162	162			75
10	Genentech	\$135,490.85		\$25.00	\$83,274.92	44		44		21
11	Sanofi-Aventis US	\$127,193.00	\$123,578.00	\$28.00	\$15,846.00	105	102	1	2	46
12	Bayer HealthCare	\$123,698.59	\$123,008.59	\$1.00	\$63,402.00	474	441		33	3
13	Forest Pharmaceuticals, a subsidiary of Forest Laboratories	\$118,618.40	\$118,618.40	\$4.35	\$29,584.10	54	54			13
14	Boehringer Ingelheim Pharmaceuticals	\$92,347.68	\$92,347.68	\$18.16	\$70,155.80	37	37			25
15	Sanofi Pasteur	\$89,419.00		\$4.00	\$75,000.00	12		12		5
16	Janssen Pharmaceutical, a division of Ortho-McNeil-Janssen Pharmaceuticals	\$67,921.43	\$67,921.43	\$12.75	\$28,307.25	19	19			4
17	Amgen	\$66,773.63	\$16,172.98	\$10.94	\$7,935.40	41	7	34		9
18	Millennium Pharmaceuticals	\$57,549.00	\$57,549.00	\$7.00	\$16,559.00	57	57			26
19	Novo Nordisk	\$57,414.31	\$57,414.31	\$9.53	\$10,027.00	28	28			4
20	Actelion Clinical Research	\$55,500.00	\$55,500.00	\$1,500.00	\$20,000.00	5	5			1
21	AstraZeneca Pharmaceuticals	\$54,268.61	\$54,268.61	\$1.24	\$8,040.00	41	41			14
22	King Pharmaceuticals	\$33,598.89	\$33,598.89	\$25.00	\$19,290.24	7	7			2
23	Stryker	\$33,494.05		\$0.00	\$13,932.00	61			61	23

Rank	Manufacturer	Expenditure Total	Pharmaceutical Expenditure Total	Minimum Expenditure	Maximum Expenditure	Number of Expenditures	Number of Pharmaceutical Expenditures	Number of Biologic Expenditures	Number of Medical Device Expenditures	Number of Recipients
24	Gilead Sciences	\$31,624.00	\$31,624.00	\$13.00	\$20,982.00	20	20			6
25	Biogen Idec	\$29,995.10		\$0.86	\$8,050.00	42		42		9
26	Alcon Laboratories	\$24,809.00	\$24,309.00	\$0.00	\$24,309.00	3	1		2	2
27	Teva Pharmaceuticals USA	\$24,805.67	\$24,805.67	\$53.58	\$2,500.00	16	16			5
28	UCB	\$21,202.00	\$11,295.00	\$600.00	\$4,036.00	10	5	5		4
29	Wright Medical Technology	\$20,686.29		\$235.51	\$14,775.84	19			19	4
30	Hoffmann-LaRoche	\$19,178.98	\$19,178.98	\$100.00	\$15,846.48	13	13			1
31	Mallinckrodt	\$18,750.00	\$18,750.00	\$9,375.00	\$9,375.00	2	2			1
32	Philips Healthcare	\$18,124.88		\$56.01	\$1,584.00	34			34	7
33	Bristol-Myers Squibb	\$17,519.97	\$17,519.97	\$5.25	\$7,850.53	8	8			6
34	The Medicines Company	\$17,188.38	\$17,188.38	\$488.38	\$3,000.00	10	10			3
35	Acorda Therapeutics	\$16,381.00	\$16,381.00	\$1,000.00	\$6,816.00	6	6			2
36	Medicis Pharmaceutical	\$15,875.00	\$3,500.00	\$480.00	\$3,500.00	12	1		11	7
37	Spineology	\$15,481.00		\$4,106.00	\$11,375.00	2			2	1
38	Centocor Ortho Biotech	\$15,333.11		\$13.86	\$4,000.00	27		27		15
39	Warner Chilcott	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	1	1			1
40	Synthes	\$14,497.95		\$230.00	\$4,344.00	14			14	11
41	Codman & Shurtleff	\$13,350.58		\$0.00	\$5,000.00	14			14	4
42	Hospira	\$12,559.79	\$12,559.79	\$1,200.00	\$6,859.79	4	4			1
43	Biosense Webster	\$12,193.36		\$46.67	\$5,000.00	13			13	3
44	Actelion Pharmaceuticals US	\$12,057.00	\$12,057.00	\$24.00	\$2,500.00	14	14			2
45	Bausch & Lomb	\$11,750.00		\$1,000.00	\$10,750.00	2			2	1
46	Abraxis BioScience	\$10,634.67	\$10,634.67	\$25.54	\$8,883.00	9	9			4
47	St. Jude Medical S.C., a division of St. Jude Medical	\$10,200.74		\$7.41	\$2,500.00	35			35	5
48	Pricara, a division of Ortho-McNeil-Janssen Pharmaceuticals	\$9,671.93	\$9,671.93	\$13.25	\$1,500.00	34	34			23
49	Ethicon Endo-Surgery	\$9,236.57		\$592.89	\$2,500.00	7			7	6

Exhibit 1 - 2

Rank	Manufacturer	Expenditure Total	Pharmaceutical Expenditure Total	Minimum Expenditure	Maximum Expenditure	Number of Expenditures	Number of Pharmaceutical Expenditures	Number of Biologic Expenditures	Number of Medical Device Expenditures	Number of Recipients
50	Zimmer	\$8,960.00		\$0.00	\$7,503.00	5			5	3
51	Genzyme	\$8,064.87	\$8,064.87	\$64.87	\$3,250.00	6	6			1
52	Covidien - Surgical Devices	\$7,928.17		\$4.75	\$2,000.00	26			26	11
53	Johnson & Johnson Vision Care	\$7,438.00		\$1,064.00	\$6,374.00	2			2	1
54	EISAI	\$6,866.00	\$6,866.00	\$1,500.00	\$5,366.00	2	2			1
55	Alexion Pharmaceuticals	\$6,751.00	\$6,751.00	\$456.00	\$3,800.00	5	5			3
56	B. Braun Medical	\$6,386.00		\$195.00	\$3,789.00	3			3	1
57	DePuy Spine, a Johnson & Johnson Company	\$6,330.00		\$1,500.00	\$4,830.00	2			2	2
58	Oticon	\$6,324.19		\$1.80	\$1,929.15	13			13	13
59	Covidien - Vascular Therapies	\$6,150.00		\$3,075.00	\$3,075.00	2			2	1
60	LifeCell	\$5,980.80		\$5,980.80	\$5,980.80	1			1	1
61	Ethicon	\$4,579.00		\$270.00	\$2,139.00	6			6	3
62	W. L. Gore & Associates	\$4,250.00		\$1,000.00	\$2,000.00	3			3	2
63	Cook Medical	\$4,215.80		\$0.00	\$4,215.80	3			3	1
64	St. Jude Medical, Cardiology Division, d/b/a St. Jude Medical Cardiovascular Division	\$4,207.98		\$10.12	\$2,500.00	10			10	1
65	Talecris Biotherapeutics	\$4,040.35		\$350.00	\$2,500.00	3		3		1
66	Astellas Pharma US	\$3,974.65	\$3,974.65	\$3.00	\$1,200.00	19	19			14
67	Boston Scientific	\$3,818.00		\$168.00	\$2,000.00	6			6	3
68	Starkey Laboratories	\$3,800.00		\$3,800.00	\$3,800.00	1			1	1
69	Ortho-McNeil, a division of Ortho-McNeil-Pharmaceuticals	\$3,695.28	\$3,695.28	\$25.00	\$3,000.00	11	11			11
70	Roche Diagnostics Operations	\$3,534.49		\$44.99	\$3,194.56	3			3	3
71	OSI Pharmaceuticals	\$3,471.65	\$3,471.65	\$3,471.65	\$3,471.65	1	1			1
72	Schering	\$3,240.44	\$3,180.44	\$0.41	\$1,500.00	97	96	1		67
73	Advanced Neuromodulation Systems, d/b/a St. Jude Medical Neuromodulation	\$3,144.00		\$3,144.00	\$3,144.00	1			1	N/A*

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74	Arthrex	\$3,022.12		\$17.86	\$1,310.30	6			6	6
75	Draeger Medical Systems	\$2,500.00		\$2,500.00	\$2,500.00	1			1	1
76	Salix Pharmaceuticals	\$2,500.00	\$2,500.00	\$500.00	\$2,000.00	2	2			2
77	ViiV Healthcare	\$2,466.00	\$2,466.00	\$2,466.00	\$2,466.00	1	1			N/A
78	Amylin Pharmaceuticals	\$2,365.64	\$2,365.64	\$2,365.64	\$2,365.64	1	1			N/A
79	C. R. Bard	\$2,283.00		\$2.00	\$1,250.00	8			8	5
80	Purdue Pharma	\$2,060.90	\$2,060.90	\$2,060.90	\$2,060.90	1	1			N/A
81	AGA Medical	\$2,000.00		\$2,000.00	\$2,000.00	1			1	1
82	Eclipse Medical	\$2,000.00		\$2,000.00	\$2,000.00	1			1	1
83	Karl Storz Endoskope	\$2,000.00		\$0.00	\$1,250.00	23			23	7
84	Endo Pharmaceuticals	\$1,996.05	\$1,996.05	\$10.07	\$99.95	32	32			28
85	3M ESPE Dental Products	\$1,979.33		\$26.80	\$358.23	18			18	11
86	Hoya Vision Care	\$1,926.23		\$143.20	\$751.53	6			6	6
87	MedImmune	\$1,750.00		\$250.00	\$1,500.00	2		2		2
88	Reckitt Benckiser	\$1,731.00	\$1,731.00	\$36.00	\$1,195.00	3	3			2
89	Intuitive Surgical	\$1,680.00		\$818.00	\$862.00	2			2	2
90	American Medical Systems	\$1,641.98		\$6.30	\$311.40	25			25	8
91	Straumann Manufacturing	\$1,601.58		\$0.00	\$985.53	3			3	2
92	Respiratory and Monitoring Solutions, a division of Covidien	\$1,521.00		\$21.00	\$1,500.00	2			2	2
93	DJO	\$1,518.00		\$1,518.00	\$1,518.00	1			1	N/A
94	Pacesetter, d/b/a St. Jude Medical Cardiac Rhythm Management Division	\$1,383.00		\$1,383.00	\$1,383.00	1			1	N/A
95	Mentor Worldwide	\$1,375.00		\$1,375.00	\$1,375.00	1			1	1
96	Becton Dickinson	\$1,364.00		\$100.00	\$631.00	4			4	3
97	ConvaTec	\$1,343.78		\$1,343.78	\$1,343.78	1			1	N/A
98	Edwards Lifesciences	\$1,268.57		\$9.30	\$606.80	5			5	5

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99	Hill-Rom	\$1,128.00		\$0.00	\$1,128.00	7			7	4
100	ALTATEC GmbH	\$1,000.00		\$1,000.00	\$1,000.00	1			1	1
101	Cardinal Health	\$1,000.00	\$1,000.00	\$1,000.00	\$1,000.00	1	1			1
102	CibaVision	\$998.34		\$98.50	\$112.48	9			9	9
103	Jazz Pharmaceuticals	\$976.20	\$976.20	\$41.20	\$610.00	3	3			1
104	Applied Medical Resources	\$966.07		\$966.07	\$966.07	1			1	1
105	Ortho-Clinical Diagnostics	\$949.00	\$28.00	\$28.00	\$435.00	4	1		3	N/A
106	Smith & Nephew	\$913.92		\$0.00	\$200.00	35			35	14
107	United Therapeutics	\$841.44	\$841.44	\$140.24	\$140.24	6	6			6
108	Eurand Pharmaceuticals	\$750.00	\$750.00	\$750.00	\$750.00	1	1			1
109	Takeda Pharmaceuticals America	\$717.90	\$717.90	\$5.59	\$121.20	17	17			16
110	Biomet 3i	\$675.00		\$0.00	\$665.00	15			15	5
111	Nobel Biocare USA	\$665.00		\$665.00	\$665.00	1			1	1
112	KCI USA	\$578.50		\$578.50	\$578.50	1			1	N/A
113	Celgene	\$547.00	\$547.00	\$247.00	\$300.00	2	2			1
114	DePuy Orthopaedics	\$506.67		\$10.87	\$455.00	3			3	2
115	Axcan Pharma US	\$500.00	\$500.00	\$500.00	\$500.00	1	1			1
116	Biomet	\$403.00		\$403.00	\$403.00	1			1	N/A
117	St. Jude Medical, Atrial Fibrillation Division, a division of St. Jude Medical	\$337.32		\$337.32	\$337.32	1			1	N/A
118	Fisher & Paykel Healthcare	\$327.21		\$327.21	\$327.21	1			1	N/A
119	Mitek	\$269.20		\$0.00	\$239.20	32			32	9
120	The Spectranetics Corporation	\$261.92		\$2.99	\$238.00	9			9	8
121	Surgi-Care	\$250.00		\$250.00	\$250.00	1			1	1
122	Cordis	\$204.81		\$204.81	\$204.81	1			1	N/A
123	Allos Therapeutics	\$115.18	\$115.18	\$8.17	\$32.10	7	7			5
124	Coloplast	\$93.31		\$26.37	\$33.97	3			3	2

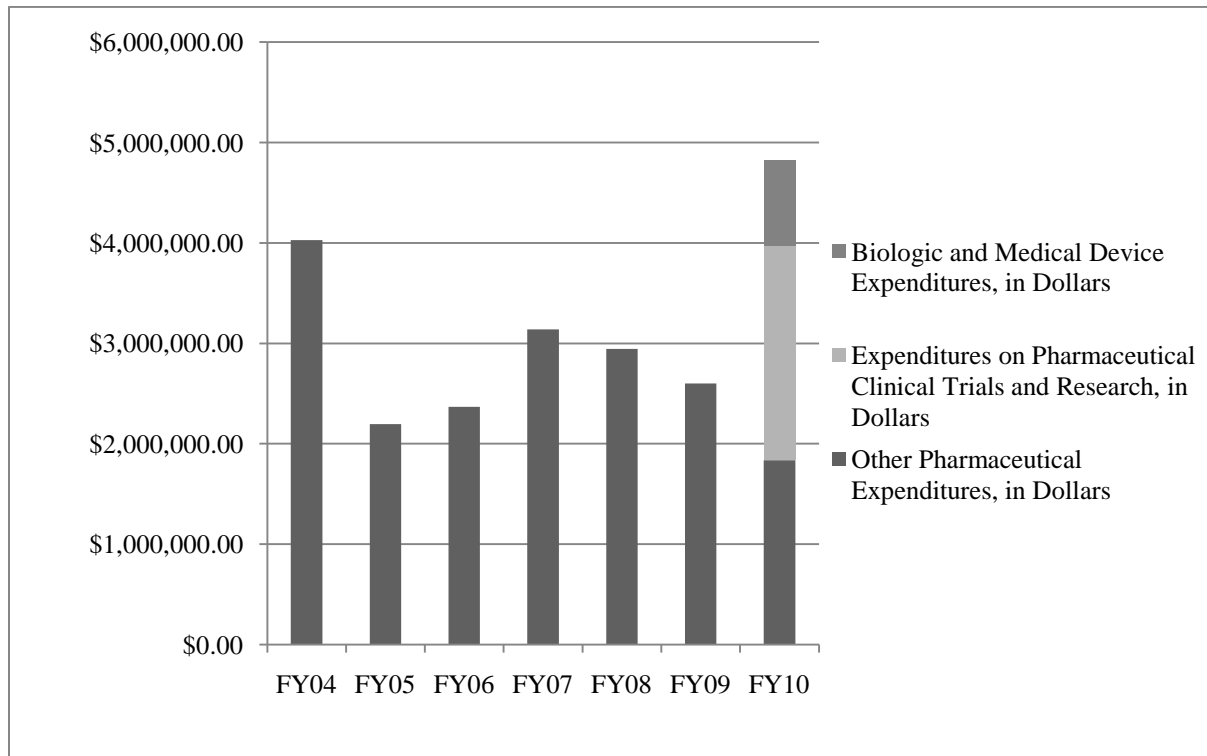
Rank	Manufacturer	Expenditure Total	Pharmaceutical Expenditure Total	Minimum Expenditure	Maximum Expenditure	Number of Expenditures	Number of Pharmaceutical Expenditures	Number of Biologic Expenditures	Number of Medical Device Expenditures	Number of Recipients
125	Phonak	\$91.03		\$25.26	\$65.77	2			2	2
126	Johnson & Johnson Health Care Systems	\$89.85		\$29.95	\$29.95	3			3	3
127	Transitions Optical	\$77.91		\$25.97	\$25.97	3			3	2
128	EBI, d/b/a Biomet Spine Biomet Trauma	\$54.94		\$54.94	\$54.94	1			1	N/A
129	Vascular Solutions	\$43.00		\$14.00	\$29.00	2			2	1
130	NuVasive	\$40.08		\$1.86	\$8.40	9			9	3
131	3M	\$37.80		\$37.80	\$37.80	1			1	N/A
132	Integra LifeSciences	\$24.99		\$0.00	\$24.99	4			4	2
133	Allos Pharmaceuticals	\$24.18	\$24.18	\$24.18	\$24.18	1	1			1
134	Arizant Healthcare	\$20.00		\$10.00	\$10.00	2			2	1
135	Nestle HealthCare Nutrition	\$13.20		\$13.20	\$13.20	1			1	1
136	Advanced Bionics	\$12.14		\$12.14	\$12.14	1			1	1
137	Covidien's Energy-based Devices	\$10.00		\$0.00	\$5.00	5			5	5
138	Alkermes	\$4.86	\$4.86	\$0.62	\$2.62	3	3			3
139	Biomet Microfixation	\$4.76		\$4.76	\$4.76	1			1	N/A
140	B. Braun Interventional Systems	\$2.00		\$1.00	\$1.00	2			2	1
141	Essilor of America	\$0.00		\$0.00	\$0.00	1			1	1

Totals \$4,829,569.18 \$3,973,654.69 — — 3,122 2,322 188 612 —

* N/A designates that the manufacturer reported only aggregate expenditures for which recipients were not listed. For FY10, the Attorney General's Office allowed manufacturers to elect to report permitted gifts with a fair market value below \$25, such as a small amount of educational brochures, as expenditures made to all Vermont health care providers and institutions in the aggregate.

Note: For purposes of this exhibit, when manufacturers disclosed one payment for marketing several different product types, the Attorney General's Office allocated the entire payment to the first product type disclosed in connection with the payment.

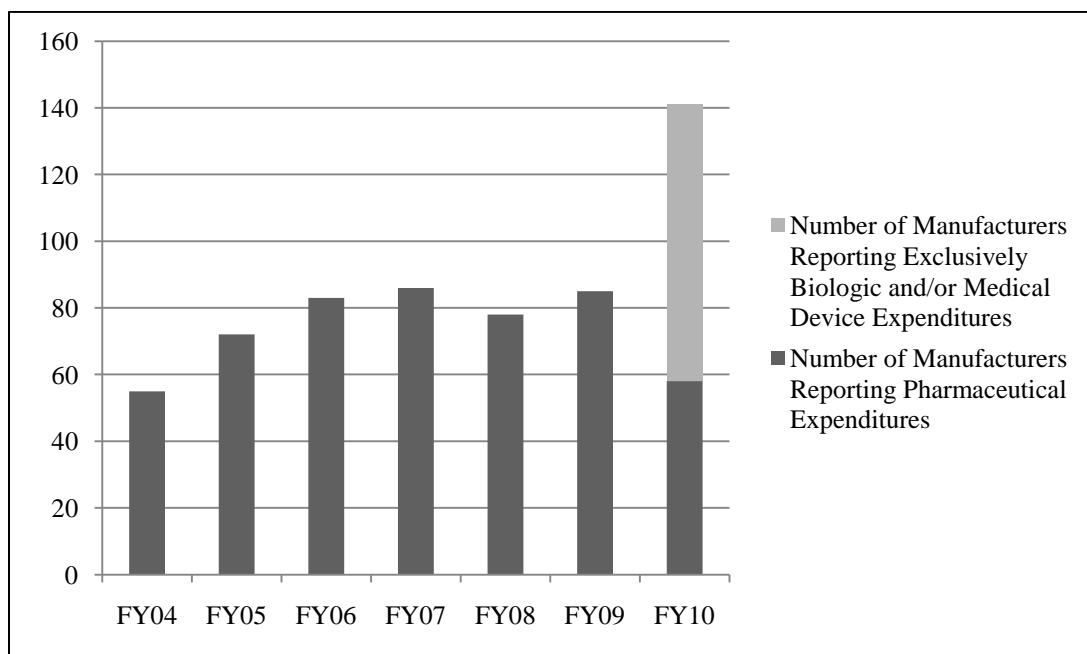
Exhibit 3: Total Expenditures, FY04-FY10



Total Expenditures	
FY04	\$4,026,576.24
FY05	\$2,196,592.26
FY06	\$2,367,604.33
FY07	\$3,139,584.63
FY08	\$2,943,321.38
FY09	\$2,599,589.00
FY10 Total Pharmaceutical Expenditures, Excluding Clinical Trials and Research	\$1,835,101.79
FY10 Total Pharmaceutical Expenditures	\$3,973,654.69
FY10 Total Expenditures	\$4,829,569.18

Note: For purposes of this exhibit, when manufacturers disclosed one payment for marketing several different product types, the Attorney General's Office allocated the entire payment to the first product type disclosed in connection with the payment.

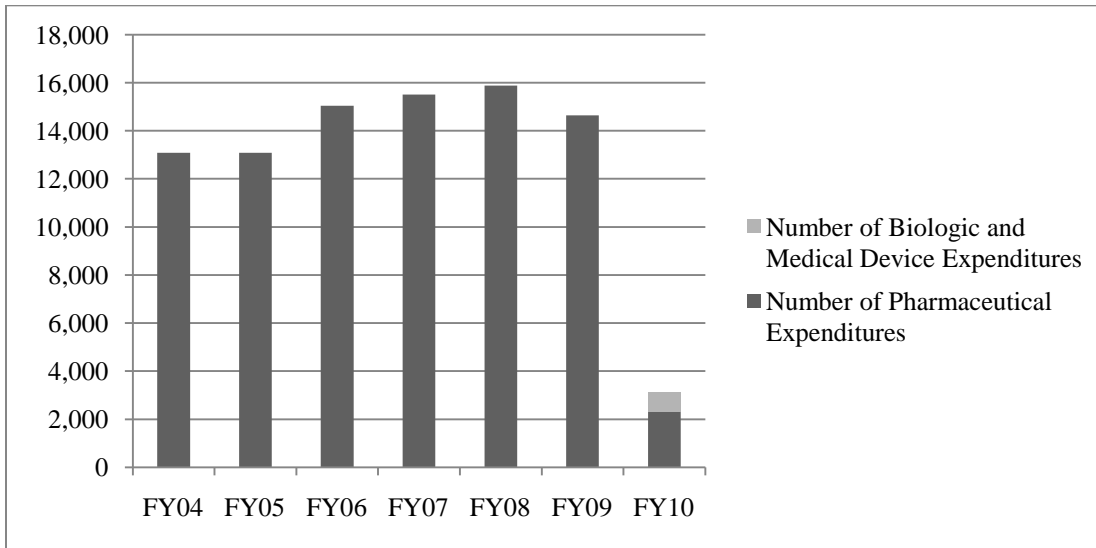
Exhibit 4: Total Number of Manufacturers Reporting Expenditures, FY04-FY10



Total Number of Manufacturers Reporting Expenditures	
FY04	55
FY05	72
FY06	83
FY07	86
FY08	78
FY09	85
FY10 Pharmaceutical Expenditures	58
FY10 Total Expenditures	141

Note: For purposes of this exhibit, when manufacturers disclosed one payment for marketing several different product types, the Attorney General's Office allocated the entire payment to the first product type disclosed in connection with the payment.

Exhibit 5: Total Number of Expenditures, FY04-FY10



Total Number of Expenditures	
FY04	13,088
FY05	13,086
FY06	15,043
FY07	15,505
FY08	15,880
FY09	14,636
FY10 Pharmaceutical Expenditures	2,322
FY10 Total Expenditures	3,122

Note: For purposes of this exhibit, when manufacturers disclosed one payment for marketing several different product types, the Attorney General's Office allocated the entire payment to the first product type disclosed in connection with the payment.

Exhibit 6: Top Five Manufacturers - Expenditures of Five Manufacturers with Highest Expenditures, FY07-FY10

FY10 Rank	FY07	FY08	FY09	FY10
1	Eli Lilly	Eli Lilly	Eli Lilly	Pfizer
2	Pfizer	Pfizer	Pfizer	GlaxoSmithKline
3	UCB	Novartis Pharmaceuticals	Forest Pharmaceuticals	Novartis Pharmaceuticals
4	Novartis Pharmaceuticals	Merck	Merck and Merck Schering Plough	Daiichi Sankyo
5	Merck	Forest Pharmaceuticals	GlaxoSmithKline	Eli Lilly
Expenditure Total for Top Five Manufacturers	\$1,756,150.56	\$1,519,745.18	\$1,230,540.64	\$2,266,455.09
Percentage of Overall Expenditure Total Attributable to Expenditures of Top Five Manufacturers	56%	52%	47%	57% of Pharmaceutical Expenditures
				47% of Total Expenditures

Note: The top five manufacturers for FY10 reported exclusively pharmaceutical-related expenditures, including expenditures related to clinical trials.

Exhibit 8: Expenditures for Physicians who Received \$3,000 or More, by Primary Specialty, FY08-FY10

FY10 Specialty Rank	Physician Specialty	FY08 Expenditure Total	FY09 Expenditure Total	FY10 Pharmaceutical Expenditure Total	FY10 Expenditure Total
1	Psychiatry	\$396,978.52	\$378,729.91	\$151,001.77	\$151,001.77
2	Neurology	\$193,377.79	\$159,364.01	\$87,411.84	\$141,546.85
3	Geriatric Medicine	\$51,672.20	\$77,338.32	\$68,987.88	\$68,987.88
4	Osteopathic Physician	\$78,645.84	\$60,461.04	\$64,349.16	\$64,349.16
5	Oncology, Medical	\$34,852.85	\$52,040.04	\$40,847.80	\$53,443.91
6	Endocrinology, Diabetes & Metabolism	\$176,347.61	\$86,345.52	\$40,083.21	\$40,083.21
7	Pediatrics	\$35,771.53	\$72,459.58	\$15,244.44	\$30,304.44
8	Internal Medicine	\$272,737.14	\$206,178.83	\$29,029.49	\$29,029.49
9	Cardiovascular Disease	\$47,034.11	\$49,516.79	\$24,499.00	\$24,499.00
10	Hematology		\$16,777.16		\$19,088.85
11	Nephrology	\$11,361.87		\$18,750.00	\$18,750.00
12	Ionizing Radiation Privileges	\$120,879.10	\$104,694.16		\$16,052.01
13	Gastroenterology	\$5,209.76		\$14,966.00	\$14,966.00
14	Critical Care Medicine	\$6,338.00	\$6,467.59	\$12,085.00	\$12,085.00
15	Ophthalmology				\$11,750.00
16	Urology	\$17,614.24	\$18,233.21	\$5,470.00	\$8,859.34
17	Pediatric Gastroenterology				\$8,549.46
18	Physical Medicine and Rehabilitation	\$12,501.48	\$17,775.75	\$6,758.08	\$6,758.08
19	Surgery, Thoracic				\$6,350.58
20	Surgery, Orthopaedic				\$4,106.00
21	Pulmonary Disease	\$6,858.42	\$3,868.91	\$3,476.57	\$3,476.57
22	Dermatology	\$15,190.14	\$6,449.30		\$3,220.00
*	Family Practice	\$96,115.95	\$122,691.13		
*	Limited Temporary Permit Physician	\$7,508.19	\$33,148.00		
*	Psychiatry, Geriatric	\$89,369.64	\$15,710.52		
*	Psychiatry, Addiction		\$9,558.69		
*	Allergy and Immunology	\$38,567.50	\$4,600.38		
*	Neurophysiology, Clinical	\$7,246.02			
Total Expenditures		\$1,722,177.90	\$1,502,388.84	\$582,960.23	\$737,257.59
Total Recipients		104	102	28	39

* There were no physicians with these specialties who received more than \$3,000 in FY10.

Note: For purposes of this exhibit, expenditures associated with clinical trials have been excluded. Primary specialty is as identified by each physician.

Exhibit 9: Expenditures by Payment Purpose for Physicians Receiving \$3,000 or More in Expenditures, FY10

Physician Rank	Physician Specialty	Expenditure Total	Education	Faculty Expense	Faculty Honoraria	Medical Device - Samples, Loans, Demos	Medical Device Training - Compensation	Medical Device Training - Other Expenses	Other*	Research Project
1	Geriatric Medicine	\$68,987.88**		\$18,943.68	\$39,842.20				\$10,202.00	
2	Psychiatry	\$62,302.37		\$2,124.22	\$3,000.00				\$57,178.15	
3	Neurology	\$55,811.17		\$353.57	\$17,350.00				\$38,107.60	
4	Osteopathic Physician	\$53,848.16	\$25.00	\$2,082.95	\$20,500.00				\$31,240.21	
5	Endocrinology, Diabetes & Metabolism	\$40,083.21		\$6,143.21	\$33,940.00					
6	Oncology, Medical	\$38,768.40		\$770.66	\$21,050.00				\$15,721.96	\$1,225.78
7	Psychiatry	\$34,433.75			\$4,500.00				\$29,933.75	
8	Neurology	\$33,336.97	\$298.81	\$7,938.16	\$25,100.00					
9	Neurology	\$31,892.86		\$1,292.86	\$30,500.00				\$100.00	
10	Cardiovascular Disease	\$24,499.00		\$1,419.00	\$23,080.00					
11	Psychiatry	\$23,769.21	\$69.00						\$23,700.21	
12	Hematology	\$19,088.85							\$19,088.85	
13	Nephrology	\$18,750.00							\$18,750.00	
14	Neurology	\$17,227.12	\$62.25		\$9,000.00				\$8,164.87	
15	Internal Medicine	\$16,858.54	\$140.24	\$1,718.30	\$15,000.00					
16	Psychiatry	\$15,840.51	\$46.81	\$440.27	\$9,250.00				\$6,103.43	
17	Pediatrics	\$15,060.00								\$15,060.00
18	Gastroenterology	\$14,966.00							\$14,966.00	
19	Psychiatry	\$14,655.93			\$300.00				\$14,355.93	
20	Critical Care Medicine	\$12,085.00		\$1,585.00	\$10,500.00					
21	Ophthalmology	\$11,750.00			\$11,750.00					
22	Pediatrics	\$11,661.40		\$161.40	\$11,500.00					
23	Osteopathic Physician	\$10,501.00		\$2,751.00	\$7,750.00					
24	Ionizing Radiation Privileges	\$9,043.36					\$7,500.00	\$1,543.36		

Exhibit 10: Expenditures by Credential for Other Health Care Providers Receiving \$3,000 or More, FY08-FY10

Other HCP Credential	FY08 Expenditure Total	FY09 Expenditure Total	FY10 Pharmaceutical Expenditure Total	FY10 Expenditure Total	FY08 Number of Recipients	FY09 Number of Recipients	FY10 Number of Pharmaceutical Expenditure Recipients	FY10 Number of Recipients
Advanced Practice Registered Nurses (APRN)	\$80,865.25	\$80,384.07	\$20,469.11	\$31,990.58	5	9	2	2
Registered Nurses (RN)	\$23,981.28	\$34,948.61	\$20,773.74	\$20,773.74	5	3	3	3
Physician Assistants (PA)	\$18,915.32	\$3,880.65			2	1	0	0
Totals	\$123,761.85	\$119,213.34	41,242.85	\$52,764.32	12	13	5	5

Exhibit 11: Expenditures for Top Products - Products Associated with Over \$10,000 in Expenditures, FY10

Rank	Product Name	Manufacturer	Product Type	Expenditure Total	Primary Indication
1	Cymbalta	Eli Lilly	Pharmaceutical	\$126,245.53	Depression, Anxiety
2	Strattera	Eli Lilly	Pharmaceutical	\$60,679.38	Attention-Deficit / Hyperactivity Disorder
3	Velcade (bortezomib) for Injection	Millennium Pharmaceuticals	Pharmaceutical	\$57,549.00	Multiple Myeloma
4	Victoza	Novo Nordisk	Pharmaceutical	\$53,604.31	Diabetes (Type 2)
5	Maxalt	Merck, Schering and MSP	Pharmaceutical	\$37,150.00	Migraines
6	Tysabri	Biogen Idec	Biologic	\$29,938.40	Multiple Sclerosis
7	Rebif	EMD Serono	Biologic	\$29,688.30	Multiple Sclerosis
8	Avonex	Biogen Idec	Biologic	\$29,581.99	Multiple Sclerosis
9	Intuniv	Shire Pharmaceuticals	Pharmaceutical	\$28,488.88	Attention-Deficit / Hyperactivity Disorder
10	Multaq	Sanofi-Aventis US	Pharmaceutical	\$27,395.00	Persistent Atrial Fibrillation or Atrial Flutter
11	Lantus	Sanofi-Aventis US	Pharmaceutical	\$25,247.00	Diabetes (Types 1 and 2)
12	Geodon	Pfizer	Pharmaceutical	\$23,652.43	Bipolar Disorder
13	Vyvanse	Shire Pharmaceuticals	Pharmaceutical	\$23,540.84	Attention-Deficit / Hyperactivity Disorder
14	Plavix	Sanofi-Aventis US	Pharmaceutical	\$22,530.53	Acute Coronary Syndrome
15	Copaxone	Teva Pharmaceuticals USA	Pharmaceutical	\$19,805.67	Multiple Sclerosis
16	Embeda	King Pharmaceuticals	Pharmaceutical	\$19,290.24	Pain
17	Optiray	Mallinckrodt	Pharmaceutical	\$18,750.00	Diagnostic Radiopaque Media
18	Avastin	Genentech	Biologic	\$18,416.45	Metastatic Colorectal Cancer
19	Lovenox	Sanofi-Aventis US	Pharmaceutical	\$18,154.00	Deep Vein Thrombosis
20	Lifeline Standard Medical Alert Service	Philips Healthcare	Medical Device	\$18,006.00	Emergency Assistance
20	Lifeline with AutoAlert Option	Philips Healthcare	Medical Device	\$18,006.00	Emergency Assistance
22	Mirena	Bayer Healthcare	Pharmaceutical	\$17,809.00	Birth Control
23	Lumigan	Allergan	Pharmaceutical	\$17,695.00	Angle Glaucoma / Ocular Hypertension
24	Alphagan	Allergan	Pharmaceutical	\$17,666.00	Prevention of Postoperative IOP
24	Restasis	Allergan	Pharmaceutical	\$17,666.00	Dry Eye Disease
26	Botox	Allergan	Pharmaceutical	\$17,642.08	Migraines
27	Acular	Allergan	Pharmaceutical	\$17,642.00	Ocular Itching
28	Nplate	Amgen	Biologic	\$17,120.20	Idiopathic Thrombocytopenic Purpura
29	Chantix	Pfizer	Pharmaceutical	\$16,448.54	Smoking Cessation
30	Levemir	Novo Nordisk	Pharmaceutical	\$16,360.86	Diabetes (Type 1 and Type 2)

Rank	Product Name	Manufacturer	Product Type	Expenditure Total	Primary Indication
30	Novo Log	Novo Nordisk	Pharmaceutical	\$16,360.86	Diabetes (Type 1 and 2)
32	Novo Log Mix	Novo Nordisk	Pharmaceutical	\$16,360.86	Diabetes (Type 1 and 2)
33	Pulmozyme	Genentech	Biologic	\$16,060.00	Cystic Fibrosis
34	Lialda	Shire Pharmaceuticals	Pharmaceutical	\$14,533.25	Ulcerative Colitis
35	Elaprase	Shire Pharmaceuticals	Pharmaceutical	\$14,344.00	Hunter Syndrome
35	Fosrenol	Shire Pharmaceuticals	Pharmaceutical	\$14,344.00	End Stage Renal Disease
37	Herceptin	Genentech	Biologic	\$13,327.85	HER2 Overexpressing Breast Cancer
38	Humalog	Eli Lilly	Pharmaceutical	\$13,285.95	Diabetes (Type 1 and Type 2)
39	Bystolic	Forest Pharmaceuticals	Pharmaceutical	\$13,211.07	Hypertension
40	Singulair	Merck, Schering and MSP	Pharmaceutical	\$13,126.57	Asthma
41	Restylane	Medicis Pharmaceutical	Medical Device	\$12,375.00	Cosmetic Treatment for Face
42	Effient	Daiichi Sankyo	Pharmaceutical	\$12,285.58	Thrombotic Cardiovascular Events
43	Tracleer	Actelion Pharmaceuticals	Pharmaceutical	\$12,057.00	Hypertension
44	Exjade	Novartis Pharmaceuticals	Pharmaceutical	\$11,603.27	Chronic Iron Overload
45	Januvia	Merck, Schering and MSP	Pharmaceutical	\$10,957.23	Diabetes (Type 2)
46	Akreos	Bausch & Lomb	Medical Device	\$10,750.00	Artificial Lens
46	Crystalens	Bausch & Lomb	Medical Device	\$10,750.00	Artificial Lens
46	Stellaris	Bausch & Lomb	Medical Device	\$10,750.00	Artificial Lens
49	Nucynta	Pricara, a division of Ortho-McNeil-Janssen Pharmaceuticals	Pharmaceutical	\$10,408.68	Pain
50	Remicade	Centocor Ortho Biotec	Biologic	\$10,297.01	Crohn's Disease
51	Hearing Aid	Oticon	Medical Device	\$10,215.22	Hearing Impairment
52	Lyrica	Pfizer	Pharmaceutical	\$10,028.43	Pain

Total

\$1,139,201.46

Note: For purposes of this exhibit, when manufacturers disclosed one payment for marketing several different products, the Attorney General's Office allocated the entire payment to each of the products disclosed in connection with the payment.

Exhibit 12: Expenditures by Primary Indication of the 50 Products with the Greatest Expenditures, FY08-FY10

FY10 Rank	Primary Indication	FY08 Expenditure Total	FY09 Expenditure Total	FY10 Expenditure Total
1	Diabetes**	\$402,650.29	\$249,462.85	\$152,177.07
2	Depression, Anxiety	\$242,730.07	\$344,227.30	\$126,245.53
3	Attention-Deficit / Hyperactivity Disorder	\$217,983.72	\$139,257.97	\$112,709.10
4	Multiple Sclerosis	\$124,341.09	\$151,750.70	\$109,014.36
5	Myeloma and/or Mantle Cell Lymphoma	\$27,767.00	\$21,906.00	\$57,549.00
6	Migraines		\$92,568.41	\$54,792.08
7	Emergency Assistance			\$36,012.00
8	Artificial Lens			\$32,250.00
9	Pain	\$58,568.93	\$66,162.77	\$29,698.92
10	Persistent Atrial Fibrillation or Atrial Flutter			\$27,395.00
11	Hypertension	\$259,220.41	\$116,204.19	\$25,268.07
12	Bipolar Disorder and/or Schizophrenia	\$76,605.66	\$145,028.09	\$23,652.43
13	Acute Coronary Syndrome			\$22,530.53
14	Diagnostic Radiopaque Media			\$18,750.00
15	Metastatic Colorectal Cancer			\$18,416.45
16	Deep Vein Thrombosis	\$18,117.00		\$18,154.00
17	Birth Control			\$17,809.00
18	Angle Glaucoma or Ocular Hypertension			\$17,695.00
19	Dry Eye Disease			\$17,666.00
20	Prevention of Postoperative IOP			\$17,666.00
21	Ocular Itching			\$17,642.00
22	Idiopathic Thrombocytopenic Purpura			\$17,120.20
23	Smoking Cessation			\$16,448.54
24	Cystic Fibrosis			\$16,060.00
25	Ulcerative Colitis		\$46,410.62	\$14,533.25
26	End Stage Renal Disease			\$14,344.00
27	Hunter Syndrome			\$14,344.00
28	HER2 Overexpressing Breast Cancer			\$13,327.85
29	Asthma	\$53,903.52		\$13,126.57

FY10 Rank	Primary Indication	FY08 Expenditure Total	FY09 Expenditure Total	FY10 Expenditure Total
30	Cosmetic Treatment for Face			\$12,375.00
31	Thrombotic Cardiovascular Events			\$12,285.58
32	Chronic Iron Overload			\$11,603.27
33	Crohn's Disease			\$10,297.01
*	Diabetes (Type 1 Only)	\$42,653.25	\$122,159.72	
*	Cholesterol	\$163,450.25	\$108,851.27	
*	Anticoagulant	\$54,661.22	\$60,528.23	
*	Overactive Bladder		\$49,555.94	
*	Cronic Obstructive Pulmonary Disease	\$34,824.52	\$49,123.20	
*	Osteoporosis	\$20,097.73	\$36,453.02	
*	Alzheimer's	\$188,966.05	\$26,733.30	
*	Gerd		\$23,229.53	
*	Bacterial Infections		\$23,196.53	
*	Benign Prostatic Hyperplasia	\$20,610.66	\$23,004.64	
*	Parkinsons Disease		\$19,546.67	
*	Stroke	\$23,110.66	\$18,775.18	
*	Hepatitis C		\$18,239.51	
*	Gout		\$16,599.31	
*	Treatment of Opioid Dependence		\$16,388.00	
*	Rheumatoid Arthritis	\$40,008.99	\$16,101.26	
*	Allergy	\$30,218.92		
*	Sleep Aid	\$20,436.33		

Totals

\$2,120,926.27 \$2,001,464.21 \$1,118,957.81

* These indications are not associated with the 50 products with greatest expenditures for FY10.

** Denotes products that treat Type 2 Diabetes or both Type 1 and Type 2 Diabetes, categories that were broken out for purposes of FY08 and FY09 reporting.

Note: For purposes of this exhibit, when manufacturers disclosed one payment for marketing several different products, the Attorney General's Office allocated the entire payment to each of the products disclosed in connection with the payment.

Exhibit 13: Expenditure by Payment Nature with Breakdown of “Other”, FY10

Payment Nature	Expenditure Total	Pharmaceutical Expenditure Total	Minimum Expenditure	Maximum Expenditure	Median Expenditure	Number of Expenditures	Number of Recipients
Cash or Check	\$4,111,588.86	\$3,485,741.67	\$2.59	\$338,000.00	\$1,000.00	1,487	207
Educational Materials	\$534,997.73	\$382,074.44	\$0.08	\$83,274.92	\$41.00	1,141	361
Out of State Gift /Allowable Expenditure*	\$80,848.46	\$78,431.95	\$3.00	\$77,891.00	\$37.59	41	24
Other	\$75,856.46	\$26,020.63	\$0.64	\$10,027.00	\$82.84	250	77
Demo/Evaluation Unit	\$26,277.67	\$1,386.00	\$0.00	\$2,285.00	\$0.00	151	62
Loan of Medical Device	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	52	12
Totals	\$4,829,569.18	\$3,973,654.69	—	—			—
Overall Median Expenditure					\$140.00	3,122	

Other Payment Nature	Expenditure Total	Minimum Expenditure	Maximum Expenditure	Number of Expenditures
Transportation	\$29,667.35	\$13.20	\$10,027.00	47
Technical Training - Medical Device	\$15,668.78	\$17.86	\$3,800.00	15
Food	\$8,633.15	\$0.65	\$289.41	108
Lodging	\$7,285.21	\$94.89	\$795.26	26
Grant	\$4,344.00	\$4,344.00	\$4,344.00	1
Fair Market Value Payment	\$4,232.83	\$0.64	\$1,000.00	36
Displays/Exhibits	\$3,745.00	\$300.00	\$1,200.00	5
Conference Sponsorship	\$2,000.00	\$2,000.00	\$2,000.00	1
Faculty	\$227.02	\$13.60	\$69.50	8
Reimbursed Expenses	\$30.12	\$10.12	\$20.00	2
Supply	\$23.00	\$23.00	\$23.00	1
Totals	\$75,856.46	—	—	250

* In FY10, manufacturers who made expenditures to health care providers with active Vermont licenses who were out of state and did not regularly practice in Vermont reported those expenditures as an out of state gift/allowable expenditure. In 2010, the legislature redefined “health care provider” to exclude those who do not regularly practice in Vermont.

Exhibit 14: Expenditure by Payment Purpose with Breakdown of “Other”, FY10

Purpose of Payment	Expenditure Total	Pharmaceutical Expenditure Total	Minimum Expenditure	Maximum Expenditure	Median Expenditure	Number of Expenditures	Number of Recipients
Bona Fide Clinical Trial	\$1,911,469.42	\$1,869,278.15	\$6.19	\$81,021.40	\$2,168.00	464	40
Education	\$577,565.72	\$435,823.35	\$0.41	\$83,274.92	\$46.81	1008	319
Research Project	\$528,775.24	\$269,274.75	\$19.11	\$90,000.00	\$438.41	65	16
Other	\$507,341.13	\$437,594.43	\$0.08	\$25,000.00	\$330.89	576	120
Conference Sponsorship	\$463,794.16	\$409,539.72	\$8.00	\$338,000.00	\$1,000.00	82	25
Faculty/Faculty Honoraria	\$401,971.45	\$316,580.45	\$0.00	\$10,750.00	\$1,500.00	229	62
Gift to Institution/Organization	\$285,621.47	\$173,294.70	\$0.00	\$100,000.00	\$2.99	72	32
Faculty Expense	\$69,148.70	\$60,269.14	\$0.41	\$10,027.00	\$60.00	309	105
Medical Device Training - Other Expenses	\$40,010.22	\$0.00	\$0.65	\$3,800.00	\$79.06	139	66
Medical Device - Samples, Loans, Demos	\$24,879.53	\$0.00	\$0.00	\$2,285.00	\$0.00	169	63
Medical Device Training - Compensation	\$12,512.14	\$0.00	\$12.14	\$5,000.00	\$2,250.00	6	5
Scholarship	\$6,480.00	\$2,000.00	\$1,550.00	\$2,930.00	\$2,000.00	3	2
Totals	\$4,829,569.18	\$3,973,654.69	—	—		3,122	—
Overall Median Expenditure					\$140.00		

Other Purpose of Payment	Expenditure Total	Minimum Expenditure	Maximum Expenditure	Number of Expenditures
Fair Market Value Payment	\$205,157.96	\$0.64	\$6,383.70	252
Consulting	\$157,074.16	\$10.12	\$9,766.00	178
Grant	\$53,417.00	\$7.00	\$16,559.00	54
Displays/Exhibits	\$31,875.00	\$150.00	\$2,000.00	37
Education	\$27,563.11	\$50.00	\$22,264.11	6
Health Organization Membership	\$25,000.00	\$25,000.00	\$25,000.00	1
Convention Fees	\$3,300.00	\$550.00	\$1,000.00	4
Speaker Training	\$2,098.31	\$250.00	\$800.00	5
Market Research Survey	\$725.00	\$85.00	\$125.00	7
Food	\$488.32	\$7.41	\$62.87	18
Marketing	\$470.18	\$5.59	\$121.20	7
Co-op spend - Newspaper	\$98.50	\$98.50	\$98.50	1
Literature	\$37.80	\$37.80	\$37.80	1
Inservice	\$20.71	\$20.71	\$20.71	1
[Blank]	\$15.00	\$3.00	\$6.00	3
Package Insert	\$0.08	\$0.08	\$0.08	1
Totals	\$507,341.13	—	—	576