

# IMPLICATIONS OF MPDIMA ON PHARMACEUTICAL COMPLIANCE PROGRAMS

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- This presentation is intended to provide a practical look at the areas of a compliance program that will be impacted by the MPDIMA
- The compliance programs will not necessarily require significant changes, but many of the existing areas will need to be considered because of the MPDIMA

# IMPLICATIONS OF MPDIMA ON PHARMACEUTICAL COMPLIANCE PROGRAMS

- Areas of the codes that may be impacted
  - Pricing
  - Relationships with health care professionals
  - False reporting to Federal Agencies
  - Antitrust laws
  - Securities laws
  - PDMA

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## Pricing

ASP calculations

AWP calculations

# IMPLICATIONS OF MPDIMA ON PHARMACEUTICAL COMPLIANCE PROGRAMS

## **Relationships with health care professionals**

Influence to place products on formularies

Use of samples to replace products utilized  
for part B coverage

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False reporting to Federal Agencies

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## Antitrust Laws

How were the bids determined?

Are there tying arrangements?

Market arrangements to split market?

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Securities Laws

Insider Trading?

Anticipation of change in market conditions?

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PDMA

Samples distribution for Part B products?