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# Living With a Corporate Integrity Agreement

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2003 Pharmaceutical Congress

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# The Pfizer CIA

- Five year term
- Commenced October 2002
- Approximately 220 “Covered Persons”
  - Managed Care Contracting
  - Sales Force that deals with Managed Care
  - Legal Division
  - Grants team
- Two IRO engagements

# The Pfizer CIA (Cont'd)

- Relevant Conduct
  - ❑ \$250,000 grant
  - ❑ Legacy Warner Lambert issue: conduct focused on two colleagues
  - ❑ No Pfizer involvement
  - ❑ No relevant employees still with Company
  - ❑ Different systems
  - ❑ Legacy WL systems displaced by Pfizer systems

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# Before the Agreement

- Keep in mind: inherited liabilities
- A strong program helps
- Watch the news; ask if it can happen at your company
- Voluntary disclosure protocol
- Audit against Sentencing Guidelines; Model Guidance
- Audit health care law systems

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# After the Agreement: What Works

- Make sure everyone knows about the CIA and understands its impact
- Frequent reminders
- “Normalize” the CIA
- Test your systems
- Get the IRO in early
- Understand the differences between your CIA and others

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# After the Agreement: What Works (cont'd)

- Stay in close touch with HHS OIG
- Have Internal Audit do a dry run of the engagement(s)
- Computerize your training systems
- Multi-disciplinary committee/task force
- Involve Board; keep them involved
- Document everything
- When in doubt, ask

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# Questions/Contact Info

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