

FAQs- HCOs

The following "frequently asked questions" relate to Novartis Pharmaceuticals Corporation's (NPC) interactions with certain healthcare organizations (HCO's) and the posting of certain associated expenditures on its public website. As part of its commitment to responsible, transparent interactions, NPC posts these payments on its public website and updates these postings annually.

Accordion:

Why does NPC (NPC) disclose its educational grant funding and charitable contributions?

On September 29, 2010, NPC entered into a Corporate Integrity Agreement (CIA) with the Office of Inspector General (OIG) of the U.S. Department of Health and Human Services.

To fulfill certain CIA-related responsibilities and as part of its general commitment to ethical transparent interactions, NPC will disclose its educational grants to HCOs and charitable contributions on its public website and update these postings annually. Disclosure of these payments is commonly referred to as Transparency Reporting.

Why does the NPC provide grant funding and charitable contributions to organizations?

NPC provides educational grants and charitable contributions to various organizations as a part of our mission to enhance and improve patient care.

These grants include funding to HCOs for purposes such as patient disease state education, patient health screening and patient access to treatment. In addition, NPC may provide funding to non-profit, tax exempt organizations for educational initiatives and community and health awareness programs. In certain cases, we also provide support to the mission and activities of a non-profit, tax exempt organization for patient advocacy or to support general organizational activities or for a specific event.

What is a healthcare organization, as defined by NPC?

NPC defines a healthcare organization as any organization that provides healthcare to patients, purchases or dispenses prescription medication, conducts clinical research, recommends or advocates treatment options, or whose entire members, entire shareholders, or all employees include healthcare professionals.

Examples of healthcare organizations include: hospitals, clinics, nursing facilities, managed care entities, universities, disease specific or professional foundations, and businesses owned by an individual or group of HCPs.

Who are "healthcare professionals" as defined by NPC?

NPC's definition of healthcare professionals includes "physicians", nurse practitioners, pharmacists, physical therapists, physician assistants, psychologists, and registered nurses, among other healthcare providers. Moreover, NPC defines "physicians" to include Medical Doctors, Doctors of Dental Surgery, Doctors of Dental Medicine, Doctors of Optometry, Doctors of Osteopathy, Doctors of Podiatry, and Doctors of Chiropractic Medicine.

Click here to see list of HCPs: [list_of_hcps.pdf](#) ^[1] (PDF 158.93 KB)

What will NPC disclose on its website with respect to both medical education grants and charitable contributions?

NPC will post, on an annual basis, the following information with respect to both medical education grants and charitable contributions provided to HCOs: 1) the ultimate recipient organization's name (and/or accredited provider if applicable), 2) a brief description of the program for which the grant or charitable contribution was requested; and 3) the amount of the grant or charitable contribution.

When will NPC begin posting information regarding medical education grants and charitable contributions?

On or before February 28, 2012, NPC will prominently post a listing of approved medical education grants and charitable contributions provided to healthcare organizations (HCOs) and processed through NPC's Grants Central Station during the calendar year 2011. Approved grants include funding for continuing medical education (CME), non-CME and charitable contributions to HCOs for the purpose of: (1) patient disease state education; (2) patient health screening; or (3) patient access to treatment.

On or before August 30, 2012, Novartis shall also post information about additional funding provided to health care related organizations for the first two quarters of 2012. These additional payments are defined as and limited to certain philanthropic grants, such as funding for educational initiatives involving community initiatives and health awareness programs; fundraising contributions, intended to provide support to the mission and activities of a non-profit, tax exempt organization; dues paid to a non-profit group or organization for patient advocacy or professional society membership; and corporate funding provided to a non-profit, tax-exempt organization to support general organization activities or for a specific event.

What is NPC Grants Central Station (NGCS)?

Novartis Grant Central Station (NGCS) is the online system used to accept applications for all funding requests. A funding request can be submitted to NGCS for review and evaluation by visiting www.ngcs.novartis.com [2]

What is a charitable contribution?

Charitable contributions include funding provided to a healthcare related charitable organization for any of the following purposes purpose: (1) to advance patient disease state education; (2) to provide health screening; or (3) to improve patient access to treatment.

What is a medical education grant?

Medical education grants include payments made by NPC to support continuing medical education ("CME") and non-CME activities. NPC supports independent accredited and non-accredited medical education for healthcare professionals to help improve patient care. Medical education grant requests are independent of commercial bias and non-promotional in nature. Educational grant requests may be submitted to support live events, web-based education or enduring print material.

What are some of the standards that NPC uses when evaluating grants to public and private institutions?

To help ensure strict compliance with national and international anti-corruption laws, such as the US Foreign Corrupt Practices Act (FCPA) and the Organization for Economic Co-operation and Development (OECD) Anti-Bribery Convention, NPC makes grants to public institutions, organizations or associations in accordance with additional requirements, including but not limited to the following:

- All grants to public institutions must be fully transparent, properly documented and accounted for; and
- Grants should be made pursuant to a formal agreement endorsed by responsible representatives of the public institution.; and
- In addition to the internal review of grants, a formal process should exist for the selection, implementation and ongoing supervision of grants, involving representatives from the public institution; and
- In the case of educational grants providing for scholarships or participation in similar long-term programs, the public institution selects the HCPs who will be invited to participate.

Does NPC Grant Office support grants from international organizations?

No, NPC provides funding only to U.S.-based organizations. Organizations based outside of the U.S. that seek support from Novartis outside of the U.S. should send their requests to the Novartis offices in their home country.

Who can receive a grant?

NPC provides grant funding to reputable institutions, organizations or associations such as, but not limited to, accredited medical education providers, hospitals, academic medical centers, medical education companies, etc. Grant requests are not awarded to individuals. Grant requests considered for funding must offer innovative, stimulating educational programs with clear goals and objectives to improve patient care. Grant requests will not be considered if they are promotional in nature. All grant requests must be submitted online via NGCS to be evaluated and processed (<http://ngcs.novartis.com/index.jsp> ^[3])

How does NPC ensure that grants and charitable contributions do not pose a conflict of interest with recipient organizations?

NPC evaluates medical education grant proposals and requests for charitable contributions against rigorous standards and maintains ethical walls to minimize the risk of conflicts of interest. The funding of such grants and charitable contributions is not intended to influence or reward the recipient(s). This funding is provided solely to improve patient lives, advance technologies and innovation, and encourage scientific research.

If a HCO disagrees with the payment information posted on NPC's website, what should they do?

NPC is committed to posting timely, accurate information about medical education grants and charitable contributions. If a HCO has questions about what is posted on our report, the HCO should send a letter on the organization's letterhead to:

Novartis Pharmaceuticals Corporation

Attn: Transparency Reporting

One Health Plaza

East Hanover, NJ 07936

The request must include the following:

- Full name of organization
- Complete Office Address
- NPC Transparency Report Name
- NPC Transparency Report Date
- NPC Transparency Report Line Number
- Question(s) regarding the posted information

NPC will research the request and mail a written response to the healthcare organization within 30 days of receipt of their letter.

If a HCO still has questions after reviewing NPC's response, what should they do?

If there are still questions, a telephone consultation with a NPC associate can be arranged by calling the toll-free number that will be included in the written response to the inquiry.

Is there a general helpline that a HCO can call anytime with questions about data posting?

To ensure that NPC can appropriately research and respond to inquiries about data postings, inquirers are asked to please follow these instructions to receive a written response to their inquiries. If there are still questions, a telephone consultation with a NPC associate can be arranged by calling the toll-free number that will be included in the written response to the inquiry.

To receive a detailed report that explains the payment information, the HCO should send a letter on the organization's letterhead to:

Novartis Pharmaceuticals Corporation

Attn: Transparency Reporting

One Health Plaza

East Hanover, NJ 07936

The request must include the following:

- Full name of organization
- Complete Office Address
- NPC Transparency Report Name
- NPC Transparency Report Date
- NPC Transparency Report Line Number

Questions regarding the posted information:

NPC will research the request and mail a written response to the healthcare organization within 30 days of receipt of their letter.

Accordion Type:

Collapsible

Source URL: <https://www.novartis.us/corporate-responsibility/payments-healthcare-organizations/faqs-hcos>

Links

- [1] <https://www.novartis.us/file/791/download?token=siUsRzfi>
- [2] <http://www.ngcs.novartis.com>
- [3] <http://ngcs.novartis.com/index.jsp>