

CA Health and Safety Code §119402

On September 29, 2004 California Governor Arnold Schwarzenegger signed into effect California Health and Safety Code §119402 requiring pharmaceutical companies, including NPC, to adopt comprehensive compliance programs (CCPs) relating to their interactions with healthcare professionals (HCPs). The CCPs must be in accordance with both the Pharmaceutical Research and Manufacturers of America™s (PhRMA) Code on Interactions with Healthcare Professionals and with the "Compliance Program Guidance for Pharmaceutical Manufacturers," published by the Office of Inspector General (OIG), U.S. Department of Health and Human Services.

The statute requires each pharmaceutical company to:

- Establish in its CCP "a specific annual dollar limit on gifts, promotional materials, or items or activities that the pharmaceutical company may give or otherwise provide to a health care professional;
- Make an annual written declaration that it is in compliance with its CCP and the new law;
- Make its compliance program and its annual declaration of compliance available to the public on its website;
- Provide a toll-free number to obtain a copy of the CCP and the annual written declaration; and
- As changes are made to either the OIG Guidance or the PhRMA Code, the company's CCP must be updated with corresponding modifications within six months.

Click the links below to access NPC's Comprehensive Compliance Program (including the California annual spend limit), 2023 Annual Declaration of Compliance, and Code of Employee Conduct. If you are unable to print the below documents, requests for copies can be obtained by emailing ethicscompliance.support@novartis.com.

- [Learn more about the NPC Comprehensive Compliance Program](#)
- [Learn more about the NPC 2022 Annual Declaration of compliance \(California\)](#)
- [Read the NPC Code of Employee Conduct \(PDF 1 MB\)](#)

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