

**Federal Register** / Vol. 68, No. 86 / Monday, May 5, 2003 / Notices **23731**

**DEPARTMENT OF HEALTH AND HUMAN SERVICES**

**Office of Inspector General**

**OIG Compliance Program Guidance for Pharmaceutical Manufacturers**

**AGENCY:** Office of Inspector General (OIG), HHS.

**ACTION:** Notice

To reduce the risks that a grant program is used improperly to induce or reward product purchases or to market product inappropriately, manufacturers should separate their grant making functions from their sales and marketing functions. Effective separation of these functions will help insure that grant funding is not inappropriately influenced by sales or marketing motivations and that the educational purposes of the grant are legitimate. Manufacturers should establish objective criteria for making grants that do not take into account the volume or value of purchases made by, or anticipated from, the grant recipient and that serve to ensure that the funded activities are *bona fide*. The manufacturer should have no control over the speaker or content of the educational presentation. Compliance with such procedures should be documented and regularly monitored.