



# ICPAP PATH

## PART OF THE PATIENT JOURNEY RISK GUIDE

This sub path illustrates potential compliance risks for life science companies when providing funding to Independent Charity Patient Assistance Programs (ICPAP). Helio helps clients navigate these challenges to provide guardrails for compliant charitable contributions.



**KICKBACK**  
company provides direct assistance to government beneficiary

**START**

Company budgets for donations to ICPAPs

Company interacts with ICPAP(s) and receives request for funding



Company reviews request for funding using ICPAP Policy guidelines



**KICKBACK**  
lacks independence or exercises influence on ICPAP

Company determines amount to fund individual ICPAP



**KICKBACK**  
bases funding decisions on ROI from previous funding



**KICKBACK**  
donates to ICPAP that awards assistance with inconsistent measures (e.g., based on product choice or varying degrees of financial need)

Patient requests assistance from ICPAP



Patient receives assistance from ICPAP



**KICKBACK**  
receives data from ICPAP to correlate funding to prescriptions covered



### HELIO SOLUTIONS TO ADDRESS KEY RISKS



Policies, Processes & Controls



Live Monitoring & Auditing



Transactional Monitoring/Records Review



Virtual Monitoring & Auditing



Email/Call Note Review



Data Analytics & Analysis