

## Report on Medicare Compliance Volume 31, Number 2. January 17, 2022 Checklist: Anticipating the Implications of White-Bagging Policies

By Nina Youngstrom

Here are things for hospitals to consider when they are faced with so-called white-bagging policies. Some commercial payers may amend contracts to require hospitals to buy specialty drugs from nonhospital suppliers on lists approved by the payers, said attorney Jim Boswell, with King & Spalding. Normally, hospitals have their own specialty pharmacies and prepare the drugs on-site. This checklist was prepared by attorneys Zuzana Ikels and Jennifer Lewin, also with King & Spalding. Contact Boswell at <a href="mailto:jboswell@kslaw.com">jboswell@kslaw.com</a>, Lewin at <a href="mailto:jboswell@kslaw.com">jboswell@kslaw.com</a>, Lewin at <a href="mailto:jboswell@kslaw.com">jboswell@kslaw.com</a>, Lewin at <a href="mailto:jboswell@kslaw.com">jboswell@kslaw.com</a>, and Ikels at <a href="mailto:zikels@kslaw.com">zikels@kslaw.com</a>.

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