

# Constance Wilkinson Quoted in "Long-Awaited AMP Rule Heralds Shift to Acquisition Cost-Based Reimbursement"

AIS Health Drug Benefit News

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**Constance A. Wilkinson**, a Member of the Firm in the Litigation and Health Care and Life Sciences practices, in the firm's Washington, DC, office, was quoted in *AIS Health Drug Benefit News*, in "Long-Awaited AMP Rule Heralds Shift to Acquisition Cost-Based Reimbursement." The article discusses the final regulatory rules for implementation of the required changes to the Medicaid Drug Rebate Program.

Following is an excerpt:

Unlike AWP, which is data reported in pricing compendia and is "really more of an adaptation or markup of a sticker purchase price," AMP is based on "actual transactional data" and takes into account price concessions, explains Connie Wilkinson, member of Epstein Becker Green in the Litigation and Health Care and Life Sciences Practices in the firm's Washington, D.C., office.

The shift to AMP, therefore, is "trying to align more closely the reimbursement the Medicaid program pays for the drug with what the provider actually paid for the drug," Wilkinson observes. "So instead of permitting there to be a spread or a differential between what the pharmacy has paid to purchase the drug and what is being reimbursed by the payer as the drug ingredient cost, this eliminates that differential between the two and sets things up in a way where the dispensing fee should more accurately compensate for the cost of the pharmacy dispensing."

## People



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