

Current Topics in 340B Pharmacies

Patient Definitions, Audits and Controlled
Substances

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- ▶ Pharmacy struggles are not unique to FQHCs
- ▶ Unique issues do arise within FQHCs

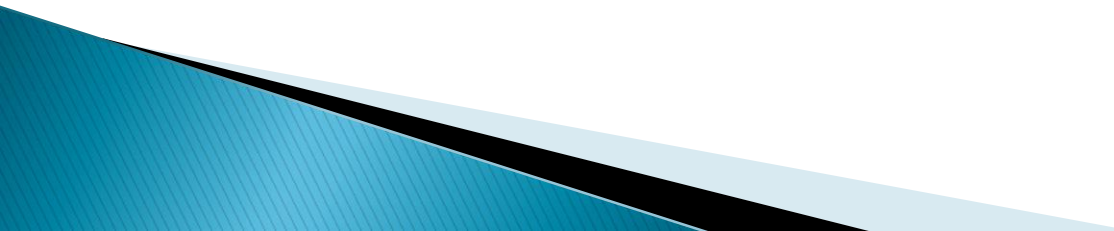
Patient Eligibility/Patient Definition

- ▶ An individual is a patient of a 340B participant (with the exception of State-operated or funded AIDS drug purchasing assistance programs) only if:
- ▶ the participant organization has established a relationship with the individual, such that it maintains records of the individual's health care; *and*
- ▶ the individual receives health care services from a health care professional who is either employed by the participant organization or provides health care under contractual or other arrangements (e.g. referral for consultation) such that responsibility for the care provided remains with the participant organization; *and*
- ▶ the individual receives a health care service or range of services from the participant organization that is consistent with the service or range of services for which grant.

Audits – HRSA conducted

- ▶ All covered entity types will be considered for random audit selection, including non-HRSA grantees and the hospitals
- ▶ Audit Proposed Focus Areas:
 - Eligibility status
 - Policies and procedures – procurement, inventory, distribution, dispensing, billing
 - Internal controls
 - Policies, procedures, & records – Diversion
 - Procurement & distribution – duplicate discount

Insurance Audits

- ▶ Purpose – Recoup as much money from your pharmacy as possible
 - ▶ Technique – Audit for clerical issues not FWA
 - ▶ Will be discussed at the Michigan 340B Pharmacists meeting May 8th, 2013
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Controlled Substances

- ▶ MAPS – Updating within 1–2 weeks
 - Updating within 1–2 weeks (hopefully sooner)
 - Nationwide tracking (currently 10 states + MI)
- ▶ Utilize Controlled Substance Contract
 - One provider/One pharmacy
 - MAPS
 - Pill Counts
- ▶ Multi disciplinary approach
 - Medical
 - Behavioral Health
 - PT/OT