

Presbyterian Hospital  
1100 Central SE  
Albuquerque, NM 87106

August 15, 2014

Dear Manufacturers:

I am writing on behalf of Presbyterian Hospital (PH), (340B ID# DSH320021), to inform manufacturers that PH recently underwent an audit by the Health Resources and Services Administration (HRSA) of PH's compliance with 340B Drug Pricing Program (340B Program) requirements.

As background, PH qualified for the 340B Program as a disproportionate share hospital (DSH) in Albuquerque, New Mexico (Bernalillo County) and has participated in the 340B Program since 4/1/2005.

Through the audit process, PH was found to have non-compliance within their 340B Program and is responsible for repayment as a result of the following finding(s):

1. Presbyterian dispensed 340B drugs to ineligible individuals.

A) Drug order not supported by medical record: An order for a medication was not documented in the patient's medical record.

B) Ineligible cost center: Presbyterian Home Health Care is not automatically eligible. A complete eligibility audit was performed and a refund has been provided to the manufacturer of the drug in question.

C) Ineligible providers: Medications ordered on eligible patients, but ordered by ineligible providers.

2. Presbyterian does not have adequate controls to prevent duplicate discounts

This may have resulted in duplicate discounts as prohibited by 42 USC 256b(a)(5)(A).

PHS has identified the potentially affected manufacturers and has contacted each to notify them of these violations to determine the potential financial impact and arrange repayment.

PH has identified all affected manufacturers and has contacted each to notify them of these violations to begin a dialogue on a method for repayment to affected manufacturers. If manufacturers have not received notification from PHS and believe repayment may be owed for the violations described in this letter, or if you have any questions or comments regarding the violations described in this letter please contact Sara Matlock, CPhT, Pharmacy Business Associate at 505-724-8891 or [smatlock@phs.org](mailto:smatlock@phs.org), Presbyterian Healthcare Services, Attn: Pharmacy Administration, 1100 Central SE, Albuquerque, NM 87106

Sincerely,  
Jackson R. Ellison  
VP, Corporate Compliance  
Presbyterian Healthcare Services