

Dear Manufacturers,

I am writing on behalf of St. Vincent Hospital and Health Care Center (“SVH”) (340B ID DSH150084) to inform manufacturers that SVH recently underwent an audit by the Health Resources and Services Administration (HRSA) of SVH’s compliance with 340B Drug Pricing Program (340B Program) requirements.

As background, SVH qualifies for the 340B Program as a disproportionate share hospital in Indianapolis, Indiana, and has participated in the 340B Program since 2008.

Through the audit process, SVH was found to have noncompliance within its 340B Program and responsible for repayment as a result of the following finding:

Audit Finding - Duplicate Discounts

The HRSA audit report states that “SVH was billing Medicaid contrary to information contained in the HRSA Medicaid Exclusion File. This action may have resulted in duplicate discounts as prohibited by 42 USC 256b(a)(5)(A).” The issue arose because SVH inadvertently dispensed drugs purchased through a 340B Program distributor account to Medicaid fee-for-service patients.

SVH has completed its internal review of the impact of this issue and will be working with the State Medicaid Agency to notify it of the scope of affected claims so that the State Agency may correct any inappropriately submitted rebate claims.

SVH does not currently believe any repayment will be owed to manufacturers. However, if required by the State Medicaid Agency, SVH will notify all affected manufacturers to offer repayment. If manufacturers have not received notification from SVH and believe repayment may be owed for the violations described in this letter, or if you have any questions or comments regarding the issues described in this letter, please contact Thomas Cook, Chief Financial Officer at 317.338.9769 or tmcook2@stvincent.org.