



November 30, 2015

Dear Manufacturers,

I am writing on behalf of Saint Vincent Health Center (340B ID DSH390009) to inform manufacturers that Saint Vincent Health Center recently underwent an audit by the Health Resources and Services Administration (HRSA) of Saint Vincent Health Center's compliance with 340B Drug Pricing Program (340B Program) requirements.

As background, Saint Vincent Health Center qualified for the 340B Program as a disproportionate share hospital (DSH) in Erie, Pennsylvania and has participated in the 340B Program since July 1st, 2008.

Through the audit process, Saint Vincent Health Center was found to have non-compliance within their 340B Program and is responsible for repayment as a result of the following finding:

Finding 1: Saint Vincent dispensed 340B drugs to ineligible individuals, as prohibited by 42 USC 256b(a)(5)(B).

Saint Vincent Health Center has identified all affected manufacturers by the manufacturer's Label Code and corresponding Address/Contact Name in the HRSA/OPA Manufacturer Database and will be contacting each by certified mail to notify them of these violations to begin a dialogue on a method for repayment to affected manufacturers.

Also through the audit process, Saint Vincent Health Center was found to have non-compliance within their 340B Program and may be responsible for repayment as a result of the following finding:

Finding 2: Saint Vincent 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).

This finding was related only to the Saint Vincent Surgery Center, a child site (340B ID DSH390009A, NPI numbers 1001625200025 and 001625200022). Saint Vincent Health Center verified that the Pennsylvania State Medicaid Agency had not sought rebates for any claims submitted by Saint Vincent Health Center or its child sites, including the Saint Vincent Surgery Center since 7/1/2008. Therefore, no repayment is required to manufacturers.

If manufacturers have not received notification from Saint Vincent Health Center 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: Peter Pascale, MS, FASHP, Director of Pharmacy, Saint Vincent Health Center, 232 West 25th Street, Erie, PA 16544, (814) 452-5441, ppascale@svhs.org.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Alfred W. Mansfield".

Alfred W. Mansfield, CPA, FACHE
Authorizing Official



Saint Vincent
Hospital

Chief Financial Officer