



June 17, 2015

Dear Manufacturers,

I am writing on behalf of UCSD Medical Center, 340B ID# DSH050025, to inform manufacturers that UCSD recently underwent an audit by the Health Resources and Services Administration (HRSA) of UCSD's compliance with 340B Drug Pricing Program requirements.

As a background, UCSD qualifies for the 340B program as a Disproportionate Share Hospital located in San Diego, California and has participated in the program since 1992.

Through the audit process, UCSD Medical Center was found to have non-compliance within their 340B program and responsible for resolution/repayment as a result of the following finding:

“Finding 1: UCSD did not have adequate controls to prevent duplicate discounts as prohibited by 42 USC 256b(a)(5)(A).”

At the time of the audit UCSD Medical Center was missing two NPI numbers on Health Resources and Service Administration's website and this may have resulted in a duplicate discount situation. Both missing NPI numbers were subsequently added to HRSA's database on 12/10/2013 under Medicaid billing information section. UCSD is currently working with the state Medicaid agency to identify claims for which duplicate discounts may have occurred related to those two NPI numbers.

UCSD has identified all affected manufacturers and has contacted each to notify them of these violations to begin a dialogue on a method of repayment to affected manufacturers. If manufacturers believe that violations may have occurred and believe repayment maybe 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 Danielle Kulischak, Pharmacy Purchasing Manager, (619) 543-6381, 200 West Arbor Drive, San Diego, California 92103.

Sincerely,

Lori Donaldson, Chief Financial Officer  
UC San Diego Health System