

**Notice to 340B Covered Entities Regarding Recalculated 340B Ceiling Prices for Galderma Products, and issuance of credits for a refund on overcharges. Products (Labeler code: 00299) For the Periods 4Q2011-2Q2014**

Galderma recently recalculated its Medicaid Average Manufacturer Price (AMP) and Best Price (BP) values previously submitted to the Centers for Medicare and Medicaid Services (CMS) for quarters between 4Q2011 and 2Q2014 for the products listed in the table below.

In connection with that recalculation, Galderma also recalculated its 340B ceiling prices, based upon updated AMPs and Unit Rebate Amounts (URA) for the affected products for the associated quarters between 4Q2011 through 2Q2014.

When the recalculated 340B price was lower than the originally reported price this was determined to be an “overcharge.” Galderma plans refunding Covered Entities the amount of the overcharges by issuing a credit (a credit can be aggregate of multiple purchases resulting in overcharges). All original purchases were made through wholesalers, and Galderma plans on issuing the credits to the Covered Entities through wholesalers. This process is being coordinated and facilitated by Apexus, the 340B Prime Vendor.

To implement the issuing of credits through wholesalers, Apexus will be communicating directly with Covered Entities on Galderma’s behalf. Galderma has provided the purchasing history directly to Apexus, including detailed information of overcharges. Apexus will make three (3) attempts to communicate to each Covered Entity where there was an overcharge. The communication attempts will be made over the course of eight weeks. If the Covered Entity does not respond within one (1) year of the date of this notice then the credit shall be considered closed.

If a Covered Entity feels that they are due a credit for a covered purchase of one of the products listed below, or have any questions, they can contract Galderma directly. Galderma has communicated this policy to HRSA and has requested that this open letter to Covered Entities be posted to HRSA’s website.

**List of Galderma Products with 340B Pricing During Applicable Period**

00299383906	ROSANIL CLEANSER 6 OZ
00299384704	CLOBEX SHAMPOO
00299384802	CLOBEX LOTION 0.05% 2 OZ
00299384804	CLOBEX LOTION 0.05% 4 OZ
00299384902	CLOBEX SPRAY
00299384904	CLOBEX SPRAY
00299450040	CLINDAGEL 40 ml
00299450075	CLINDAGEL 75 ml
00299550004	CAPEX Shampoo
00299576500	DESOWEN LOTION 0.05
00299576502	DESOWEN LOTION 0.05
00299576503	DESOWEN LOTION 0.05
00299576504	DESOWEN LOTION 0.05
00299577001	DESOWEN CREAM 0.05
00299577060	DESOWEN CREAM 0.05

00299577501	DESOWEN OINTMENT 0.05
00299577560	DESOWEN OINTMENT 0.05
00299590825	EPIDUO PUMP
00299590845	EPIDUO GEL BPO 45 GM
00299591045	DIFFERIN GEL
00299591202	DIFFERIN .1% LOTION
00299591545	DIFFERIN Cream
00299591825	DIFFERIN GEL 0.3%
00299591845	DIFFERIN GEL
00299595030	TRI-LUMA CREAM
00299596002	PERIOSTAT 20 MG
00299630002	METVIXIA CREAM
00299598030	MIRVASO GEL 0.33%
00299610010	PLIAGLIS CREAM 7%
00299610035	PLIAGLIS CREAM 7%