

Northwell Health

North Shore-LI Health System is now **Northwell Health**

March 18, 2016

Dear Manufacturers:

I am writing on behalf of Long Island Jewish Medical Center (LIJMC), 340B ID DSH330195, to inform manufacturers that LIJMC recently underwent an audit by the Health Resources and Services Administration (HRSA) regarding LIJMC's compliance with the 340B Drug Pricing Program requirements.

As background, LIJMC qualifies for the 340B Program as a Disproportionate Share Hospital and has participated in the 340B Program since July 1, 2007.

Through the audit process, LIJMC was found to have non-compliance with their 340B Program, and to be responsible for potential repayment as a result of two findings:

One finding was that in one instance, LIJMC dispensed a 340B drug to an ineligible individual as prohibited by 42 U.S.C. 256b(a)(5)(B). LIJMC's internal review established that in this instance, a human error resulted in selecting the outpatient account when the patient was actually an inpatient at the time of the drug administration; however, the error was detected before any billing to the patient's insurer. Moreover, internal review established the drug at issue was not actually purchased through 340B. LIJMC is now regularly auditing to protect against problems stemming from human error in selecting the correct patient account.

The second finding was that LIJMC's listed incomplete billing information in the HRSA Medicaid Exclusion File; this may have resulted in duplicated discounts as prohibited by 42 U.S.C. 2546b(a)(5)(A). LIJMC's internal review confirmed that several off-site facilities were not correctly listed in the HRSA Medicaid Exclusion File. That error was corrected, and all are presently listed. Of the impacted facilities, only one NPI was billing Medicaid during the time it was not correctly listed, implicating potential duplicate discounts. LIJMC previously notified all potentially impacted manufacturers of this error. LIJMC has further instituted systemic changes, staff training and audit protocols to prevent recurrence.

As noted above, LIJMC has identified all potentially affected manufacturers and has contacted each to notify them of these violations. If a manufacturer has not received notification from LIJMC and believes repayment may be owed for the violations described in this letter, or if you have any questions or comments regarding the contents of this letter, please contact:

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Sincerely,

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