



April 18, 2016

Dear Manufacturers:

I am writing on behalf of the University of Vermont Medical Center (DSH470003) to inform manufacturers that UVM Medical Center recently underwent an audit by the Health Resources and Services Administration (HRSA) of our compliance with 340B Drug Pricing Program (340B Program) requirements.

As background, The UVM Medical Center qualified for the 340B Program as a disproportionate share hospital in Burlington, Vermont and has participated in the 340B Program since April 1, 2005.

Through the audit process the UVM Medical Center was found to have non-compliance within their 340B Program and responsible for repayment as a result of the following findings:

UVMC dispensed a 340B drug to an ineligible individual, as prohibited by section 340B (a)(5)(B) of the PHSA.

HRSA found that one prescription in the audit sample was written at an ineligible site by an ineligible provider. UVM Medical Center had identified this prescription as ineligible prior to the audit, but the prescription remained in the audit sample.

UVMC listed incorrect or incomplete billing information on the 340B Medicaid Exclusion File. This may have resulted in duplicate discounts as prohibited by section 340B(a)(5)(A) of the PHSA.

HRSA found that the UVM Medical Center did not list the NPI number or the New York Medicaid number for its Pain Medicine Clinic on the Medicaid Exclusion File. The audit found that 15 visits occurred where New York Medicaid patients visited the Pain Medicine Clinic.

The UVM Medical Center has identified all affected manufacturers and has contacted each to notify them of these violations to begin a dialogue on a method for repayment to affected manufacturers. If manufacturers have not received notification from the UVM Medical 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:

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