

Dear Manufacturers,

I am writing on behalf of the Charlotte County Health Department (CCHD), ID # TB339507, to inform manufacturers that the CCHD recently underwent an audit by the Health Resources and Services Administration (HRSA) of the CCHD's compliance with 340B Drug Pricing Program (340B Program) requirements as contained in the final report dated June 24, 2013

As background, the CCHD qualified for the 340B Program as a State of Florida, Department of Health, County Health Department and has participated in the 340B Program since 1998.

Through the audit process, the CCHD was found to have non-compliance within their 340B Program as a result of the following finding:

CCHD was billing Medicaid contrary to information contained in HRSA Medicaid Exclusion File. This action **may** have resulted in duplicate discounts as prohibited by 42 USC 256b(a)(5)(A).

The audit report went on to state that while "none of the 340B drugs included in the sample demonstrated evidence of a duplicate discount" the CCHD was required to take further evaluative and/or corrective actions. As a result, the TB Control Section fully investigated the 340B practices of the CCHD and verified that there were not any instances of duplicate discounts or rebates. The TB Control Section further established that the CCHD does not purchase any TB drugs and does not have any fiscal transactions with manufacturers. All TB drugs are purchased by the Department of Health Central Pharmacy from Cardinal Health and provided to the CCHD at no cost.

The CCHD has verified that there are no affected manufacturers. However, if manufacturers have not received notification from the CCHD 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 Dennis Nye, 4025 Bald Cypress Way, Bin A-20, Tallahassee, Florida 32399-1708; phone (850) 245-4444, ext. 2311.