

Jewish Hospital & St. Mary's Healthcare

July 2, 2014

Dear Manufacturers;

I am writing on behalf of Jewish Hospital and Saint Mary's Healthcare (JHSMH), DSH180040, to inform manufacturers that JHSMH underwent an audit by Health Resources and Services Administration (HRSA) in May 2012 to assess JHSMH's compliance with 340B Drug Discount Program (340B Program) requirements.

As background JHSMH qualified for the 340B Drug Discount Program as a Disproportionate Share Hospital in Louisville, Kentucky and has participated in the 340B program since December 6, 2005.

Through the audit process JHSMH was found to have non-compliance within its 340B program and was required to see that repayment was made as a result of the following finding: JHSMH does not have adequate controls to prevent duplicate discounts as prohibited by 42 USC 256b(a)(5)(A).

As stated in JHSMH's Corrective Action Plan dated January 9, 2014, it was confirmed with Kentucky Medicaid in June 2012 that rebate credits were issued to all manufacturers who were subject to duplicate discounts related to JHSMH's 340B program for the time period between February 2012 and June 2012, which reflects the date that Kentucky Medicaid changed its rebate identification practice from the use of Medicaid numbers to NPI numbers and the date when JHSMH updated its 340B registration to reflect its NPI number. The rebates were required due to the JHSMH's use of the Medicaid numbers instead of NPI numbers on Medicaid claims. Each affected manufacturer has been credited with a rebate for the duplicate discount.

If manufacturers have questions or comments regarding the violations described in this letter please contact Mark Milburn, Vice President, at (502) 210-4222 or at [MarkMilburn@CatholicHealth.Net](mailto:MarkMilburn@CatholicHealth.Net).

Sincerely,

Mark Milburn  
Vice President  
KentuckyOne Health  
Jewish Hospital and Saint Mary's Healthcare  
200 Abraham Flexner Way  
Louisville, KY 40202