

Dear Manufacturers,

I am writing on behalf of RHCC (Robeson Health Care Corporation 340B ID# CH049000) to inform manufacturers that RHCC recently underwent an audit by the Health Resources and Services Administration (HRSA) of RHCC's compliance with 340B Drug Pricing Program (340B Program) requirements.

As background, RHCC qualified for the 340B Program as a Community Health Center located in Robeson County, North Carolina and has participated in the 340B Program since January 1995.

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

Finding 1: *Incorrect 340B database record.*

RHCC closed the CI Smith Dental Office in 2009. This location had not been removed from the database. This has been corrected.

Finding 2: *RHCC dispensed a 340B drug to a ineligible individual as prohibited by 42 USC 256b(a)(5)(B).*

RHCC patient received a prescription, the same medication written for in the past by a RHCC 340B eligible provider, but the contract pharmacy transposed the wrong provider name when they refilled the medication. The affected manufacturer has been identified. This has been corrected.

Finding 3: *RHCC does not have adequate controls to ensure compliance with the duplicate discount provision of the 42 USC 256b(a)(5)(A).*

RHCC uninsured patient received a 340B prescription. The next month, the patient obtained Medicaid coverage. The patient returned to the contract pharmacy to refill the medication. The pharmacy billed Medicaid for the prescription. However, the pharmacy tech attempted to back bill Medicaid for the previous prescription. RHCC, with collaboration of the Rx Strategies (Pharmacy Benefit Manager), was able to provide documentation that the Medicaid transaction was actually reversed before being completed. This has been corrected.

RHCC has identified all affected manufacturers and has contacted each to notify them of the violation to begin a dialogue on a method for repayment to the affected manufacturer. If manufacturer has not received notification from RHCC and believe repayment may be owed for the violation described in this letter, or if you have any questions or comments regarding the violations described in this letter please contact Leslie Sanderson, Pharmacy Program Director, RHCC.

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