

October 21, 2014

Dear Manufacturers:

Crusaders Central Clinic Association (CCCA) (340B ID CH052760) underwent an audit by the Health Resources and Services Administration (HRSA) on February 19-20, 2013 relating to compliance with the 340B Drug Pricing Program requirements.

As background, CCCA qualified for the 340B Program as a Federally Qualified Health Center and has participated in the 340B Program since December 1, 1992.

Through the audit process, HRSA found CCCA to be non-compliant as it relates to the Medicaid Exclusion File requirement, i.e. providing incomplete information, in that an applicable NPI number was not posted. As a result, CCCA could be responsible for repayment subject to proper notice and hearing prior to such determination per 42 USC Sec. 256b(a)(5)(D). Specifically, HRSA found that:

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

However, CCCA at all times complied with Illinois Medicaid requirements for identifying 340B drugs dispensed to Medicaid beneficiaries. Accordingly, CCCA has not identified any repayment obligation resulting from this finding. If manufacturers have any reason to believe that they may have been impacted by this issue or if you have any questions or comments regarding the issue, please contact Luis Delgado, Compliance Analyst, at (815) 490-1668 or 1200 West State Street, Rockford, IL 61102.

Sincerely,

Gordon Eggers, Jr.
Chief Executive Officer