



City and County of San Francisco
Edwin M. Lee, Mayor

Department of Public Health
Barbara A. Garcia, MPA
Director of Health

January 19, 2016

Dear Manufacturers,

I am writing on behalf of SF Community Clinic Consortium (SFCCC), Covered Entity for 340B ID# CH09107A, to inform manufacturers that SFCCC recently underwent an audit by the Health Resources and Services Administration (HRSA) of SFCCC's compliance with 340B Drug Pricing Program requirements.

As a background, SFCCC qualifies for the 340B program as a Community Health Center located in San Francisco, California and has participated in the program since July 1, 1997.

Through the audit process, SFCCC was found to have non-compliance within their 340B program and to be responsible for resolution/repayment as a result of the following finding:

“Duplicate Discounts – Entity was billing Medicaid contrary to information included in the Medicaid Exclusion File.”

At the time of the audit, the 340B database record for SFCCC reflected an answer of "no" to the question, "Will you bill Medicaid for drugs purchased at the 340B price?" However, 340B drugs dispensed from SFCCC's contract pharmacy (SFGH Outpatient Pharmacy, NPI 1447288634) were being billed to Medicaid. SFCCC will work with the state Medicaid agency when claims have been identified for which duplicate discounts may have occurred related to this NPI number.

Based on best available information, SFCCC has identified all potentially-affected manufacturers and has contacted each to notify them of this violation to begin a dialogue on a method of repayment to affected manufacturers, if applicable. If manufacturers have not received notification from SFCCC 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 Swati Patel, Outpatient Pharmacy Supervisor, swati.patel@sfdph.org, 1001 Potrero Ave, Pharmacy Room 1P2, San Francisco, California 94110.

Sincerely,

Roland Pickens, Director
San Francisco Health Network
For Covered Entity SFCCC