

Baystate Franklin Medical Center

Greenfield, MA 01301

Dear Manufacturers,

I am writing on behalf of Baystate Franklin Medical Center (BFMC), 340B ID# DSH22016, to inform manufacturers that BFMC recently underwent an audit by the Health Resources and Services Administration (HRSA) of BFMC's compliance with 340B Drug Pricing Program (340B Program) requirements.

As background, BFMC qualified for the 340B Program as a Disproportionate Share Hospital in Greenfield, Massachusetts and has participated in the 340B Program since April 1st, 2009.

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

- BFMC obtained covered outpatient drugs through a GPO
- BFMC dispensed 340B drugs to ineligible individuals, as prohibited by section 340B(a)(5)(B) of the PHSA
- BFMC did not have adequate controls to prevent duplicate discounts which may have resulted in duplicate discounts, as prohibited by section 340B(a)(5)(A) of the PHSA.

BFMC has identified all affected manufacturers and has contacted each to notify them of these violations to begin a dialogue on a method for repayment to affected manufacturers. If manufacturers have not received notification from BFMC and believe repayment may be owed for violations described in this letter, or if you have any questions or comments regarding the violations described in this letter, please contact Gary J. Kerr, MBA, Pharm.D., Chief Pharmacy Officer, Baystate Health, at (413) 794-3178 or Gary.Kerr@BaystateHealth.org.