

340B Drug Pricing Program – Apexus Update




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Objectives

- Explain Apexus' role as the 340B Prime Vendor
- Provide 340B Program overview
- Discuss program trends and current landscape

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340B Prime Vendor Focus

 Contracting and Distribution 	 Education and Training 	 HRSA - Aligned National Call Center 
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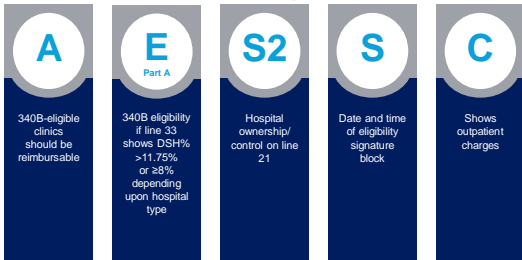
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340B Hospital Eligibility

Entity Type	Non-Profit/ Gov't Contract	DSH %	GPO Prohibition	Orphan Drug Applies?
Disproportionate Share Hospital (DSH)	Yes	>11.75%	Yes	No
Children's Hospital (PED)	Yes	>11.75%	Yes	No
Free-Standing Cancer Hospital (CAN)	Yes	>11.75%	Yes	Yes
Critical Access Hospital (CAH)	Yes	N/A	No	Yes
Rural Referral Center (RRC)	Yes	≥8%	No	Yes
Sole Community Hospital (SCH)	Yes	≥8%	No	Yes

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340B Registration - Hospital Cost Report



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What patients and drugs are eligible for 340B?

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340B Covered Outpatient Drugs

- ✓ Manufacturers participating in the Medicaid Drug Rebate Program must also provide 340B pricing on COPD to CE's

- ✓ Outpatient drugs
- Over-the-counter drugs (with a prescription)
- Clinic administered drugs
- Biologics (exception: vaccines)
- Insulin



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http://hfma.wisconsin.gov/CP_Home/owa/CP/340B2.aspx

Applying Patient Definition in Practice



- Notes**
- Service must be more than dispensing
 - ADAP entities are excepted from this requirement
 - Scope of grant requirement applies to grantees only
 - Covered entities carving-out Medicaid must ensure that 340B drugs are not billed to Medicaid

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Major 340B Compliance Areas

- Patient definition compliance (prevent diversion)
- Prevent Medicaid duplicate discounts
- Certain hospitals only
 - Group Purchasing Organization (GPO) Prohibition
 - Orphan drug exclusion

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Do you know who from your C-Suite is responsible for 340B?



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Roles of the C-Suite

- Registration and recertification as authorizing official or primary contact
- Provide oversight and accountability for 340B Program health
- Ensure adequate resources for program support

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Registration Process

- New entities, entity sites, contract pharmacies
- 2 week registration periods, quarterly updates made to OP AIS
- Change requests: changes to existing information, rolling basis

Update Official	October 1	January 1	April 1	July 1
Registration Period	July 1--15	October 1--15	January 1--15	April 1--15

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Recertification

- Entities are required to recertify information in OPAIS annually
 - Certifies that information in OPAIS is accurate
 - Certifies that CE is still eligible and meets compliance requirements
- HRSA sends a notification email to authorizing official and primary contact
- The authorizing official performs the recertification online



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How do you structure oversight at your organization?



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340B Resources

- Dedicated FTEs
- Self-auditing
 - Readiness for HRSA or manufacturer audit
- Program oversight committee
- Relationship and oversight of third parties
 - Contract pharmacies
 - Split-billing software
- Ongoing staff education



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340B Tools: Where to Find Help

- Go to 340bpvp.com
- Hover over “Education”
- Click on “340B Tools”
- Tools arranged by CE type



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340B Oversight Best Practices Dashboard

Purpose: The purpose of this tool is to provide covered entities with a framework for monitoring and communicating 340B oversight based on best practices. The audience for this tool is intended to be the 340B Steering Committee. This template is based on best practices shared by covered entities; it is not an exhaustive list, and can be customized according to the covered entity's specific circumstances. Historical time periods may be incorporated to provide benchmarking and trends.

Sample Policy and Procedure Manual
GPO Prohibition Hospitals (DSH/PED/CAN)

Purpose: This document contains the written policies and procedures that [Entity] uses to oversee 340B Program operations, provide oversight of contract pharmacies, and maintain a compliant 340B Program.

<https://www.340bpvp.com/education/340b-tools/>

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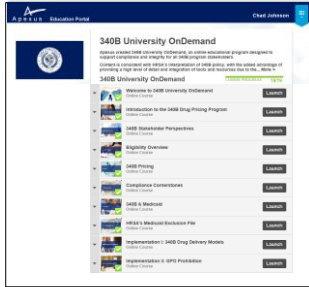


How do you ensure that everyone involved in program oversight stays up to date?



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340B University OnDemand



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Apexis Answers



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340B University Live




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Does your organization track 340B savings?



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Calculating 340B Program Value and Use of Savings 

Purpose: This tool is intended to help all types of 340B covered entities understand their 340B program value and document their use of 340B savings. It gives guidance on how to calculate program value as well as articulate benefits provided to the community based on total expense for a variety of services. This tool has been developed based on best practices from informed stakeholders and was validated with covered entities (DSH, FQHC, and other grantees). This tool does not represent a HRSA requirement for 340B Program compliance.

TABLE 2: USE OF 340B SAVINGS

Program or Service Provided	Total Expense	Description (how this aligns with 340B Program intent)

Best practice: Show how 340B savings are reinvested in entity services (e.g. community benefit, charity care, drug access programs, free clinics, sliding fee scales)

<https://www.340bpvp.com/education/340b-tools/>



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How can Apexus support 340B value for your entity?



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PVP Opportunities Report

- PVP Opportunities Report at www.340Bpvp.com (Favorites Bar), secure login
 - Tools → Purchasing Dashboard → Opportunities



Example Opportunity Report

Participant Opportunities Report

Participant: (All) Account Type: (All)

Product Line	Manufacturer Name	Label Name	Product Code	Unit Price	Contract Price Type	Unit Cost	Product Type	Contract Price Type	Contract Manufacturer	Contract Label Name	Contract Type	Contract Status
10	1000	PVP Price	10000	1000	1000	1000	1000	1000	1000	1000	PVP Price	Active
1	13	PVP Price	13	13	13	13	13	13	13	13	PVP Price	Active
1	4	PVP Price	4	4	4	4	4	4	4	4	PVP Price	Active
1	7	WAC Price	7	7	7	7	7	7	7	7	WAC Price	Active
4	18	ASP Price	18	18	18	18	18	18	18	18	ASP Price	Active
26	90	WAC Price	2600	90	90	90	90	90	90	90	WAC Price	Active
1	26	PVP Price	26	26	26	26	26	26	26	26	PVP Price	Active
26	31	ASP Price	320	31	31	31	31	31	31	31	ASP Price	Active
26	8	PHS Price	260	8	8	8	8	8	8	8	PHS Price	Active
2	26	PVP Price	52	26	26	26	26	26	26	26	PVP Price	Active
26	76	PVP Price	105	76	76	76	76	76	76	76	PVP Price	Active
1	27	WAC Price	27	27	27	27	27	27	27	27	WAC Price	Active
26	2	ASP Price	50	26	26	26	26	26	26	26	ASP Price	Active

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Program Trends and Current Landscape





Questions?

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