

340B ADVISORY COMMITTEE

Members:

C. Dean Germano (Chair)
Viola Lujan
Kathryn Powell
Amir Khoyi, PharmD
Dan Santi

PHC Staff:

Elizabeth Gibboney, CEO
Sonja Bjork, COO
Robert L. Moore, MD, MPH, MBA, CMO
Patti McFarland, CFO
Wendi West, Northern Executive Director
Amy Turnipseed, Senior Director of External and Regulatory Affairs
Michelle Rollins, Director of Legal Affairs
Stan Leung, PharmD, Director of Pharmacy Services
Tony Hightower, Associate Director of Pharmacy Operations
Dawn R. Cook, Program Manager II

INTRODUCTION:

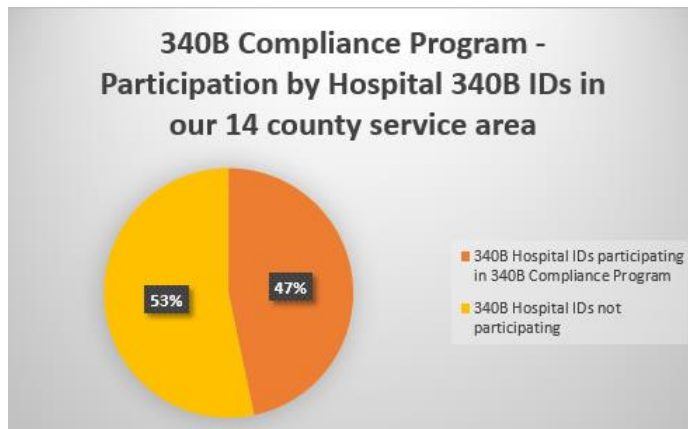
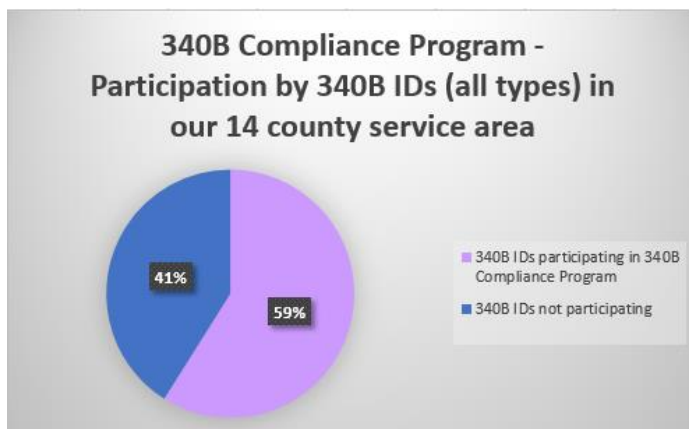
The last 340B Advisory Committee Meeting took place on March 10, 2021.

UPDATE:

340B Contracting Update:

As of June 30, 2021, there are 363 340B IDs/sites (167 of which are tied to hospitals) in PHC's 14 county service area, which are eligible to participate in the 340B Program. The 363 340B IDs/sites would equate to 86 340B Compliance Program Agreement (of which 29 agreements would be tied to the 167 hospital IDs/sites).

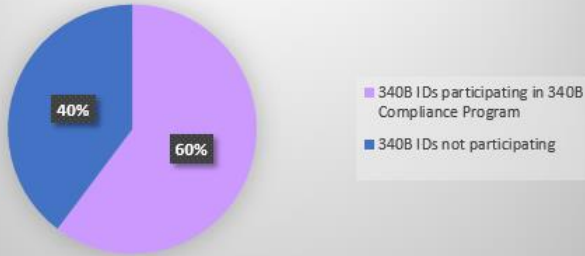
As of June 30, 2021, there are 31 active 340B Compliance Program Agreements (five of which are tied to hospitals), so 31 340B Participating Entities. Those 31 active 340B Compliance Program Agreements cover 214 340B IDs/sites (78 of which are tied to hospitals).



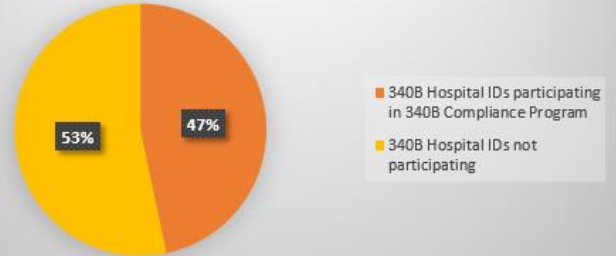
As of July 1, 2021, there will be 367 340B IDs/sites (167 of which will be tied to hospitals) in PHC's 14 county service area, which will be eligible to participate in the 340B Program. The 367 340B IDs/sites would equate to 86 340B Compliance Program Agreements (of which 29 agreements would be tied to the 167 hospitals IDs/sites).

As of July 1, 2021, there will still be 31 active 340B Compliance Program Agreements (five of which will be tied to hospitals), so 31 340B Participating Entities. Those 31 active 340B Compliance Program Agreements will cover 221 340B IDs/sites (78 of which will be tied to hospitals).

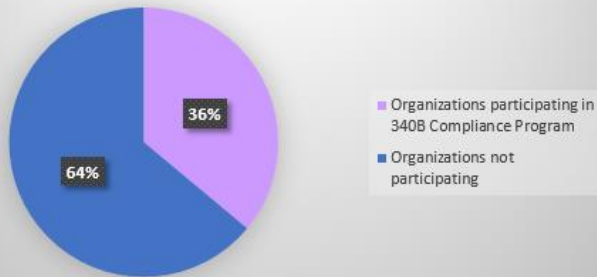
340B Compliance Program - Participation by 340B IDs (all types) in our 14 county service area



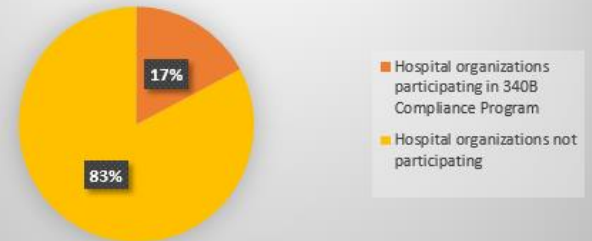
340B Compliance Program - Participation by Hospital 340B IDs in our 14 county service area



340B Compliance Program - Participation by organization (number of agreements we would have) in our 14 county service area



340B Compliance Program - Participation by Hospital organizations (number of agreements we would have) in our 14 county service area



There are currently no new 340B Compliance Program Agreements under review.

Financial Summary:

The information provided in the tables below reflects data provided by 340BX Clearinghouse each month regarding the claim counts tied to the reclassification process and invoicing tied to PHC's 340B Compliance Program.

340B ADVISORY COMMITTEE UPDATE

June 2021

Financial summary for 1/1/21 to 3/31/21

Month	CRX 340B Paid Match Claim Count	CRX 340B Reversal Claim Count	Walgreens 340B Paid Match Claim Count	Walgreens 340B Reversal Match Claim Count	Wellpartner 340B Paid Match Claim Count	Wellpartner 340B Reversal Match Claim Count	SunRx 340B Paid Match Claim Count	SunRx 340B Paid Reversal Claim Count	340BX Compliance Fee	PHC 340B Compliance Fee	Total 340B Compliance Fees
January-21	3610	216	4527	23	3556	33	830	11	\$31,307.50	\$3,130.75	\$34,438.25
February-21	1971	16	3076	1	2144	1	389	0	\$18,950.00	\$1,895.00	\$20,845.00
March-21	6033	29	3023	0	2598	4	556	0	\$30,525.00	\$3,052.50	\$33,577.50
TOTAL:	11,614	261	10,626	24	8,298	38	1,775	11	\$80,782.50	\$ 8,078.25	\$ 88,860.75

TOTAL 340B CLAIMS RECLASSIFIED BY 340BX CLEARINGHOUSE THIS QUARTER:	32,313
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Entity	1/1/21 TO 3/31/21										
	340B Paid Match Claim Count	340B Reversal Claim Count	Walgreens 340B Paid Match Claim Count	Walgreens 340B Reversal Match Claim Count	Wellpartner 340B Paid Match Claim Count	Wellpartner 340B Reversal Match Claim Count	SunRx 340B Paid Match Claim Count	SunRx 340B Paid Reversal Claim Count	340BX Compliance Fee	PHC 340B Compliance Fee	Total 340B Compliance Fees
Adventist Health Mendocino Coast	151	8	0	0	0	0	0	0	\$ 377.50	\$ 37.75	\$ 415.25
Alliance Medical Center	400	9	32	0	130	0	0	0	\$ 1,405.00	\$ 140.50	\$ 1,545.50
CommuniCare Health Centers	406	6	0	0	0	0	0	0	\$ 1,015.00	\$ 101.50	\$ 1,116.50
Fairchild Medical Center	1,391	40	0	0	0	0	0	0	\$ 3,477.50	\$ 347.75	\$ 3,825.25
Hill Country Community Clinic	197	10	0	0	0	0	0	0	\$ 492.50	\$ 49.25	\$ 541.75
La Clinica De La Raza	0	0	1,918	5	0	0	0	0	\$ 4,795.00	\$ 479.50	\$ 5,274.50
Lake County Tribal Health Consortium, Inc.	0	0	0	0	0	0	0	0	\$ -	\$ -	\$ -
Long Valley Health Center	24	0	0	0	0	0	0	0	\$ 60.00	\$ 6.00	\$ 66.00
Marin Community Clinic Inc.	704	13	609	0	0	0	0	0	\$ 3,282.50	\$ 328.25	\$ 3,610.75
McCloud Healthcare Clinic	79	1	0	0	0	0	0	0	\$ 197.50	\$ 19.75	\$ 217.25
Mendocino Coast Clinics, Inc.	487	13	0	0	12	0	0	0	\$ 1,247.50	\$ 124.75	\$ 1,372.25
Mendocino Community Health Clinics, Inc.	3,305	44	418	0	115	1	0	0	\$ 9,595.00	\$ 959.50	\$ 10,554.50
Modoc Medical Center	71	1	0	0	0	0	0	0	\$ 177.50	\$ 17.75	\$ 195.25
Mountain Valleys Health Centers, Inc.	377	21	0	0	0	0	0	0	\$ 942.50	\$ 94.25	\$ 1,036.75
NorthBay Healthcare Group	0	0	826	1	664	6	0	0	\$ 3,725.00	\$ 372.50	\$ 4,097.50
Northeastern Rural Health Clinics, Inc.	94	0	0	0	0	0	0	0	\$ 235.00	\$ 23.50	\$ 258.50
Ole Health	0	0	0	0	860	5	1,775	11	\$ 6,587.50	\$ 658.75	\$ 7,246.25
Open Door Community Health Centers	0	0	4,536	12	5,432	23	0	0	\$ 24,920.00	\$ 2,492.00	\$ 27,412.00
Redwoods Rural Health Center	476	28	143	0	4	0	0	0	\$ 1,557.50	\$ 155.75	\$ 1,713.25
Shasta Community Health Centers	3,313	64	2,140	6	1,081	3	0	0	\$ 16,335.00	\$ 1,633.50	\$ 17,968.50
Shingletown Medical Center	29	0	4	0	0	0	0	0	\$ 82.50	\$ 8.25	\$ 90.75
Sonoma Valley Community Health Center	110	3	0	0	0	0	0	0	\$ 275.00	\$ 27.50	\$ 302.50
Winters Healthcare Foundation	0	0	0	0	0	0	0	0	\$ -	\$ -	\$ -
QUARTER TOTALS:	11,614	261	10,626	24	8,298	38	1,775	11	\$ 80,782.50	\$ 8,078.25	\$ 88,860.75

TOTAL 340B CLAIMS RECLASSIFIED BY 340BX CLEARINGHOUSE THIS QUARTER:	32,313
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Medi-Cal Rx-Pharmacy Carve-out

On February 17, 2021, DHCS announced it would be delaying the planned Go Live date of April 1, 2021 for Medi-Cal Rx because of the need to review new conflict avoidance protocols submitted by Magellan Health, the project's contracted vendor. DHCS anticipated providing further information in May 2021. The Medi-Cal Rx Provider Manual was available on the Medi-Cal Rx portal. Per the Medi-Cal Rx Provider Manual, "Providers billing drugs purchased pursuant to the 340B program (covered entities and contracted pharmacies) are required to bill an amount not to exceed the entity's Actual Acquisition Cost (AAC) plus dispensing fee for the drug." Providers would be reimbursed the lesser of the billed amount (AAC plus Profession Dispensing Fee) or the maximum rate permitted.

As of June 2021, there are no new updates regarding Medi-Cal Rx. The Medi-Cal Rx Subscription Service continue to encourage providers to register for the Secure Provider Portal. Medi-Cal Rx was mentioned in the May Revision of the California State Budget, but more as a financial placeholder rather than a policy statement.

340B Advisory Committee:

At this point, the 340B Advisory Committee will remain intact.

340B Coalition Conferences:

Ms. Cook will not be attending the 340B Coalition Summer Conference 2021, which will be held virtually on July 20 – 22 and 27 – 28, 2021.

NEXT 340B ADVISORY COMMITTEE MEETING:

The next 340B Advisory Committee Meeting is scheduled to take place on Thursday, September 16, 2021, from 1 p.m. to 2:25 p.m.

QUESTIONS/COMMENTS:

If you have any questions or comments, please submit them to the Pharmacy Department at 340BQIP@partnershiphp.org.