

### **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  
Stan Leung, PharmD, Director of Pharmacy Services  
Dawn R. Cook, Program Manager II

### **INTRODUCTION:**

The last 340B Advisory Committee Meeting took place on September 16, 2021.

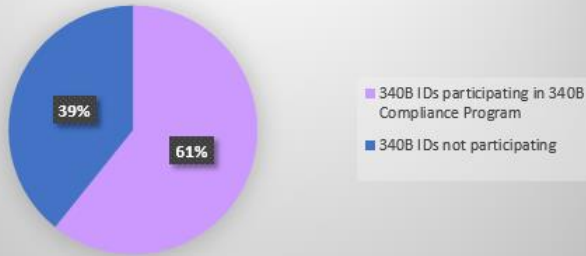
### **UPDATE:**

#### **340B Contracting Update:**

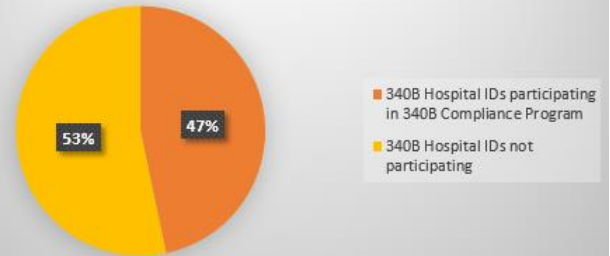
**As of December 31, 2021**, there are 367 340B IDs/sites (167 of which are tied to hospitals) in PHC's 14 county service area, which are eligible to participate in the 340B Program. The 367 340B IDs/sites would equate to 86 340B Compliance Program Agreement (of which 29 agreements would be tied to the 167 hospital IDs/sites).

**As of December 31, 2021**, there are 32 active 340B Compliance Program Agreements (five of which are tied to hospitals), so 32 340B Participating Entities. Those 32 active 340B Compliance Program Agreements cover 223 340B IDs/sites (78 of which are tied to hospitals).

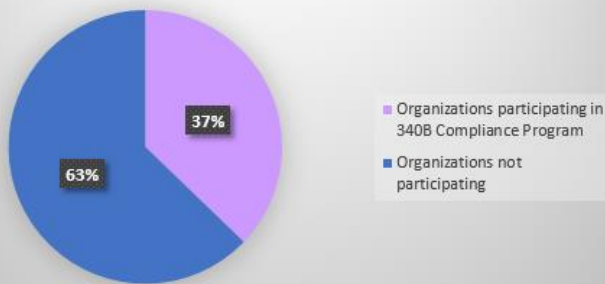
**340B Compliance Program - Participation by 340B IDs (all types) in our 14 county service area**



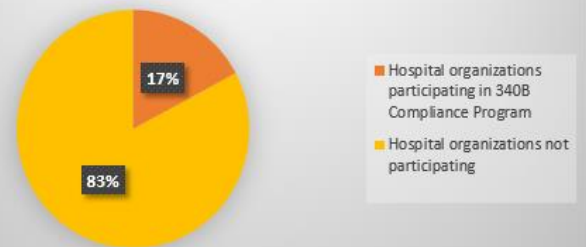
**340B Compliance Program - Participation by Hospital 340B IDs in our 14 county service area**



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



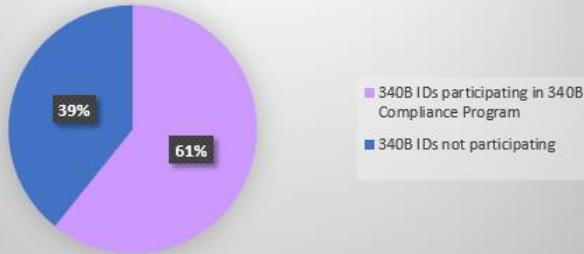
**340B Compliance Program - Participation by Hospital organizations (number of agreements we would have) in our 14 county service area**



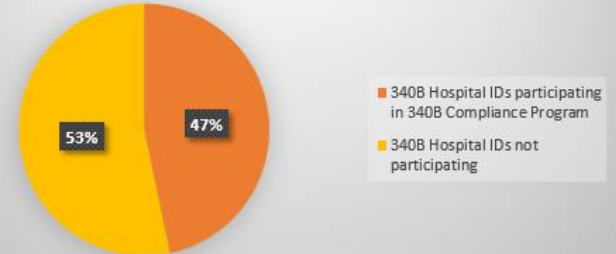
**As of January 1, 2022**, there will be 369 340B IDs/sites (169 of which will be tied to hospitals) in PHC’s 14 county service area, which will be eligible to participate in the 340B Program. The 369 340B IDs/sites would equate to 86 340B Compliance Program Agreements (of which 29 agreements would be tied to the 169 hospitals IDs/sites).

**As of January 1, 2022**, there will still be 32 active 340B Compliance Program Agreements (five of which will be tied to hospitals), so 32 340B Participating Entities. Those 32 active 340B Compliance Program Agreements will cover 225 340B IDs/sites (81 of which will be tied to hospitals).

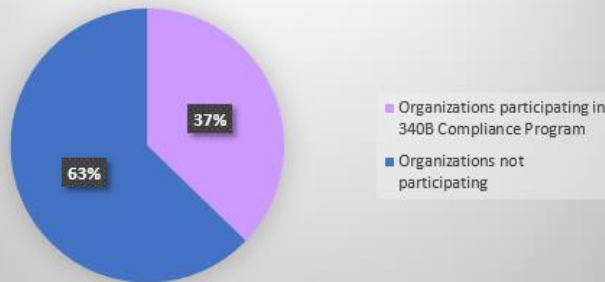
**340B Compliance Program - Participation by 340B IDs (all types) in our 14 county service area**



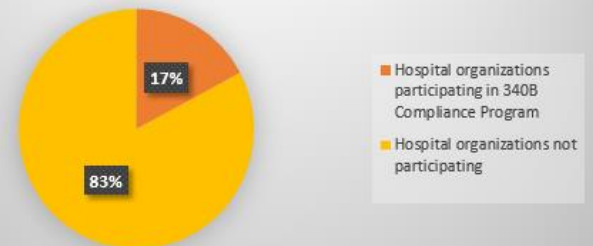
**340B Compliance Program - Participation by Hospital 340B IDs in our 14 county service area**



**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**



Due to the implementation of Medi-Cal Rx slated for January 1, 2022, no additional 340B Compliance Programs will be executed.

### Financial Summary for 7/1/21 to 9/30/21:

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

## December 2021

| 7/1/21 TO 9/30/21  |                             |                           |                                       |   |   |   |                                   |                                      |                      |                         |                            |
|--|-----------------------------|---------------------------|---------------------------------------|---|---|---|-----------------------------------|--------------------------------------|----------------------|-------------------------|----------------------------|
| Entity   | 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                         | 9                         | 0                                     | 0   | 0                                       | 0   | 0                                 | 0                                    | \$ 377.50            | \$ 37.75                | \$ 415.25                  |
| Alliance Medical Center  | 541                         | 28                        | 7                                     | 0   | 0                                       | 0   | 0                                 | 0                                    | \$ 1,370.00          | \$ 137.00               | \$ 1,507.00                |
| CommuniCare Health Centers   | 144                         | 11                        | 78                                    | 1   | 0                                       | 0   | 0                                 | 0                                    | \$ 555.00            | \$ 55.50                | \$ 610.50                  |
| Fairchild Medical Center   | 1,941                       | 189                       | 0                                     | 0   | 0                                       | 0   | 0                                 | 0                                    | \$ 4,852.50          | \$ 485.25               | \$ 5,337.75                |
| Hill Country Community Clinic  | 976                         | 27                        | 0                                     | 0   | 0                                       | 0   | 0                                 | 0                                    | \$ 2,440.00          | \$ 244.00               | \$ 2,684.00                |
| La Clinica De La Raza  | 0                           | 0                         | 640                                   | 2   | 0                                       | 0   | 0                                 | 0                                    | \$ 1,600.00          | \$ 160.00               | \$ 1,760.00                |
| Lake County Tribal Health Consortium, Inc.                                 | 0                           | 0                         | 0                                     | 0   | 0                                       | 0   | 0                                 | 0                                    | \$ -                 | \$ -                    | \$ -                       |
| Long Valley Health Center  | 156                         | 4                         | 0                                     | 0   | 0                                       | 0   | 0                                 | 0                                    | \$ 390.00            | \$ 39.00                | \$ 429.00                  |
| Marin Community Clinic Inc.  | 981                         | 44                        | 0                                     | 0   | 0                                       | 0   | 0                                 | 0                                    | \$ 2,452.50          | \$ 245.25               | \$ 2,697.75                |
| McCloud Healthcare Clinic  | 63                          | 0                         | 0                                     | 0   | 0                                       | 0   | 0                                 | 0                                    | \$ 157.50            | \$ 15.75                | \$ 173.25                  |
| Mendocino Coast Clinics, Inc.  | 2,021                       | 84                        | 0                                     | 0   | 0                                       | 0   | 0                                 | 0                                    | \$ 5,052.50          | \$ 505.25               | \$ 5,557.75                |
| Mendocino Community Health Clinics, Inc.                                   | 4,649                       | 193                       | 117                                   | 2   | 78                                      | 3   | 0                                 | 0                                    | \$ 12,110.00         | \$ 1,211.00             | \$ 13,321.00               |
| Modoc Medical Center   | 84                          | 1                         | 0                                     | 0   | 0                                       | 0   | 0                                 | 0                                    | \$ 210.00            | \$ 21.00                | \$ 231.00                  |
| Mountain Valleys Health Centers, Inc.                                      | 892                         | 49                        | 0                                     | 0   | 0                                       | 0   | 0                                 | 0                                    | \$ 2,230.00          | \$ 223.00               | \$ 2,453.00                |
| NorthBay Healthcare Group  | 0                           | 0                         | 443                                   | 7   | 977                                     | 15  | 0                                 | 0                                    | \$ 3,550.00          | \$ 355.00               | \$ 3,905.00                |
| Northeastern Rural Health Clinics, Inc.                                    | 271                         | 26                        | 0                                     | 0   | 0                                       | 0   | 0                                 | 0                                    | \$ 677.50            | \$ 67.75                | \$ 745.25                  |
| Ole Health   | 0                           | 0                         | 0                                     | 0   | 947                                     | 11  | 1,804                             | 18                                   | \$ 6,877.50          | \$ 687.75               | \$ 7,565.25                |
| Open Door Community Health Centers   | 0                           | 0                         | 2,176                                 | 11  | 4,821                                   | 71  | 0                                 | 0                                    | \$ 17,492.50         | \$ 1,749.25             | \$ 19,241.75               |
| Redwoods Rural Health Center   | 404                         | 16                        | 32                                    | 0   | 10                                      | 0   | 0                                 | 0                                    | \$ 1,115.00          | \$ 111.50               | \$ 1,226.50                |
| Shasta Community Health Centers  | 5,086                       | 206                       | 946                                   | 9   | 1,577                                   | 34  | 0                                 | 0                                    | \$ 19,022.50         | \$ 1,902.25             | \$ 20,924.75               |
| Shingletown Medical Center   | 21                          | 0                         | 0                                     | 0   | 0                                       | 0   | 0                                 | 0                                    | \$ 52.50             | \$ 5.25                 | \$ 57.75                   |
| Sonoma Valley Community Health Center                                      | 442                         | 17                        | 0                                     | 0   | 0                                       | 0   | 0                                 | 0                                    | \$ 1,105.00          | \$ 110.50               | \$ 1,215.50                |
| Winters Healthcare Foundation  | 0                           | 0                         | 0                                     | 0   | 0                                       | 0   | 0                                 | 0                                    | \$ -                 | \$ -                    | \$ -                       |
| <b>QUARTER TOTALS:</b>   | <b>18,823</b>               | <b>904</b>                | <b>4,439</b>                          | <b>32</b>                                 | <b>8,410</b>                            | <b>134</b>                                  | <b>1,804</b>                      | <b>18</b>                            | <b>\$ 83,690.00</b>  | <b>\$ 8,369.00</b>      | <b>\$ 92,059.00</b>        |
| <b>TOTAL 340B CLAIMS RECLASSIFIED BY 340BX CLEARINGHOUSE THIS QUARTER:</b> |                             |                           |                                       |   |   |   |                                   |                                      |                      | <b>33,476</b>           |                            |

| 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 |
|--|---------------------------------|-------------------------------|---------------------------------------|---|---|---|-----------------------------------|--------------------------------------|----------------------|-------------------------|----------------------------|
| July-21  | 5896                            | 246                           | 1471                                  | 15  | 2494                                    | 63  | 576                               | 8                                    | \$26,092.50          | \$2,609.25              | \$28,701.75                |
| August-21  | 9044                            | 377                           | 2106                                  | 10  | 4203                                    | 31  | 890                               | 6                                    | \$40,607.50          | \$4,060.75              | \$44,668.25                |
| September-21   | 3883                            | 281                           | 862                                   | 7   | 1713                                    | 40  | 338                               | 4                                    | \$16,990.00          | \$1,699.00              | \$18,689.00                |
| <b>TOTAL:</b>  | <b>18,823</b>                   | <b>904</b>                    | <b>4,439</b>                          | <b>32</b>                                 | <b>8,410</b>                            | <b>134</b>                                  | <b>1,804</b>                      | <b>18</b>                            | <b>\$83,690.00</b>   | <b>\$ 8,369.00</b>      | <b>\$ 92,059.00</b>        |
| <b>TOTAL 340B CLAIMS RECLASSIFIED BY 340BX CLEARINGHOUSE THIS QUARTER:</b> |                                 |                               |                                       |   |   |   |                                   |                                      |                      | <b>33,476</b>           |                            |

### Medi-Cal Rx-Pharmacy Carve-out

Medi-Cal Rx will be implemented on January 1, 2022.



### **Future of PHC's 340B Compliance Program**

Post Medi-Cal Rx, PHC will continue to support 340B Program Compliance for medication services where PHC has financial responsibility.

PHC will continue to support the claim reclassification services provided through 340BX Clearinghouse for 340B Contract Pharmacy claims into 2022. Those services will be supported and provided through March 2022 to allow for reclassification of retroactive 340B claims with a date of service of December 31, 2021 or earlier.

The current 340B Compliance Program will end effective June 30, 2022.

- All executed 340B Compliance Program Agreements with 340B Participating Entities will be terminated, as will the agreement with 340BX Clearinghouse.
- With regard to PHC's oversight of 340B Physician-Administered Drugs (PADs), PHC will terminate the current reclassification system and payment tiers. Any requests tied to use of the UD modifier would revert back to inclusion in standard eCIF requests handled by PHC's Claims Department.

### **340B Advisory Committee:**

As Medi-Cal Rx is moving forward, the 340B Advisory Committee will no longer be needed. Dr. Moore will discuss with Liz the timing of submission of a motion to the Board to phase out the 340B Advisory Committee.

### **NEXT 340B ADVISORY COMMITTEE MEETING:**

The final 340B Advisory Committee Meeting is scheduled to take place on Thursday, March 10, 2022, from 2 p.m. to 3:25 p.m.

### **QUESTIONS/COMMENTS:**

If you have any questions or comments, please submit them to the Pharmacy Department at [340BQIP@partnershiphp.org](mailto:340BQIP@partnershiphp.org).