



Alaska Primary Care  
ASSOCIATION

**340B Summit: Strategy and Compliance**  
**Alaska Primary Care Association**  
**Tuesday, June 12, 2018**  
**Program Agenda**

**8:00 – 8:30 AM – Registration**

**8:30 – 9:00 AM – Opening Session**

- Welcome
- Introductions and objectives
- *Let's talk about Alaska* – an opening discussion about community health centers and the challenges of providing access to affordable medication in Alaska

**9:00 – 9:30 AM – 340B Basics**

Establishes the foundation of basic knowledge to support the more detailed material and discussions to follow.

- Underlying assumptions impacting program implementation and compliance
- Overview of the program
- Key definitions and terms
- Basics of the compliance framework
- Intersection of 340B and Section 330 Program Expectations

**9:30 – 9:45 AM - The Strategic Imperative and Role of Leadership**

Defines the role and responsibility of leadership to **optimize** and **protect** the 340B program and outlines specific responsibilities for senior leadership in doing so.

**9:45 – 10:30 AM - Optimizing the Program**

- Models for implementing 340B
- Inventory management
- Recommendations for measuring and monitoring performance
- Strategies for expanding patient access and increasing utilization of the health center pharmacy.

**10:30 – 10:45 AM - Break**

### **10:45 AM – 12:15 PM - Optimizing Compliance**

- Participation requirements
  - Auditable records
  - Registration and recertification
- Patient definition and preventing diversion
  - What is diversion?
  - What makes a prescription eligible?
  - 340B eligibility across the continuum of care
- Compliance with Medicaid
  - What is duplicate discount?
  - Carve-in/carve-out
  - Challenges in preventing duplicate discount

### **12:15 – 1:00 PM - Lunch Break**

### **1:00 – 1:30 PM - Optimizing Compliance (continued)**

- Contract compliance including essential contract components and effective oversight of contract pharmacy arrangements

### **1:30 – 2:30 PM - Updates on Program Oversight and Audit Activity**

Reviews the HRSA Integrity Initiative, HRSA audit process, and oversight conducted during Operational Site Visits. Includes:

- Audit risk factors
- Pre and post audit process
- Recent audit findings
- OSV questions
- Recommended policy framework

### **2:30 – 3:00 PM - Changing Reimbursement Landscape**

Overview of the emerging reimbursement issues at the federal and state level including impact of the Medicaid Covered Outpatient Drug Rule and third-party efforts to shift savings away from the covered entities through strategies dubbed “predatory contracting.”

### **3:00 – 3:15 PM - Break**

### **3:15 – 3:45 PM - Spotlight on the 340B Program**

Overview of the legislative, regulatory, and administrative scrutiny of the program, the possible actions, and the potential consequences of those actions. Includes a discussion of the essential elements necessary to advocate for the integrity of the 340B program including.

### **3:45 – 4:30 PM - Hot Topics and Q&A**

Closing session to focus on any hot topics and questions that have risen throughout the day.