

## The HRSA Proposed 340B Pricing Program Omnibus Guidance



The [Health Resources and Services Administration \(HRSA\)](#) in August

2015 issued a notice proposing guidance under the 340B Drug Pricing Program. The proposal is an attempt to clear up confusion about program rules and eliminate ambiguity in the marketplace for all 340B Program stakeholders. Although the proposed guidance is intended to clarify HRSA's existing policy interpretations, a significant practical effect is to change the standard for 340B patient eligibility. It would also restrict the number of physicians who could write 340B-eligible prescriptions.

The program allows certain participating covered entities and other health care providers to obtain discounted prices on outpatient prescription drugs. These entities are required to prove compliance with 340B program requirements overseen by the HRSA within the Department of Health and Human Services (HHS), and are subject to audit. The "mega" guidance could have significant impact on plans and operations, once the final guidance is published in September 2016.

In this [two-hour LIVE Webcast](#), a panel of key thought leaders assembled by [The Knowledge Group](#) will provide healthcare practitioners and professionals with an in-depth review of HRSA's 340B Drug Pricing Program Omnibus Guidance. The panel will also help analyze the possible effects and challenges of the Guidance and will offer a roadmap on how to prepare and what needs to be done in order to ensure compliance.

**When:** Tuesday, June 14, 2016 @ 12:00 pm – 2:00 pm (PST) / 3:00 pm – 5:00 pm (EST)

**Speakers:** [John A. Mills](#), Partner at Nelson Hardiman, LLP; Neil W. Hoffman, Ph.D., Partner at Arnall Golden Gregory LLP and Christine M. Morse, Principal at Ober | Kaler.

### Key topics include:

- Proposed 340B Drug Program Guidance
- Covered Entity Eligibility and Registration
- Program Requirements
- Contract Pharmacy Requirements
- Manufacturer Responsibilities
- Patient Definition
- Scope of Eligible Drugs
- 340B Prime Vendor Program
- Medicaid Managed Care and Duplicate Discounts
- Auditable Records and Audits
- Who Will Be Impacted and How



- Best Compliance Practices

Complimentary Pass Courtesy of Nelson Hardiman, LLP: [Register Here](#)

\*Note: CLE/CPE/CE credit requires a minimal Certificate of Attendance processing fee of \$49 per participant (normally paid by the attendee) if credit is needed to apply to the bar.

Please note, complimentary passes are available for the first 30 registrants. Once all of the passes are used, attendees can register for the deeply discounted rate of \$25 each courtesy of Nelson Hardiman, LLP.