

Hierarchy of Payors for 340b Medications**1.7**

The Poverello Center, Inc. complies with regulations that pertain to payor systems for STD medications in its 340b program. The hierarchy of payors for medications for people with STD's at Poverello follows a structured order based on eligibility, availability, and the type of coverage. Here is our chosen hierarchy:

1. Private Insurance

- a. Employer-Sponsored Insurance
- b. Individual Market Insurance

2. Public Insurance Programs

- a. "Straight" Medicaid: Primary payor for low-income individuals. ***Ineligible for 340b services.***
- b. Medicaid HMO's: are eligible under our programming for 340b discounts.¹
- b. Medicare: For individuals who are 65 or older, or who have certain disabilities.
- c. Medicare Part D: Prescription drug coverage.
- d. Medicare Part B: Covers specific drugs administered by a physician.

3. Ryan White HIV/AIDS Program (For people with HIV only)

- a. Provides a safety net for people with HIV who are uninsured or underinsured.
- b. AIDS Drug Assistance Programs (ADAP): Part of Ryan White offers medication assistance.²
- c. Ryan White Programs are payors of last resort. Poverello will only pay for services/products from earned funds after all programs have exhausted payments and the client is left with additional expenses.

4. Housing Opportunities for People with AIDS (HOPWA)

- a. housing services, when available from HOPWA are to be used before services provided by Poverello.

5. Patient Assistance Programs (PAPs)

Programs sponsored by pharmaceutical companies to provide medications at low or no cost to eligible patients. ***This does not include anyone eligible for any federal programming like ADAP.***

6. Non-Profit Organizations and Charities

Organizations such as The Poverello Center, Inc. may provide additional support, including free or subsidized medications.

7. Out-of-Pocket Payments

Patients may have to pay out of pocket for medications if no other payor is available.

This hierarchy ensures that patients have access to necessary medications through various means, prioritizing coverage options based on availability and financial need. It also maximizes available resources as combining various payors can help reduce financial obligations of patients.

Approvals:

Signature: _____

Date: _____

Thomas S. Pietrogallo, CEO

BOD Approved Date: Date Established: 07/18/2024; Date Revised: N/A

¹ "The data on the HRSA MEF applies to Medicaid fee-for-service only and does not apply to Medicaid managed care organizations (MCO)." Available 7.18.2024 at: <https://www.hrsa.gov/opa/program-requirements/medicaid-exclusion>

² FAQ 1407, Titled "ADAP, 340B entity, duplicate discount" see email from Elizabeth Faus 7/11/2024.