

**From:** [noreply@salesforce.com](mailto:noreply@salesforce.com) on behalf of [Elizabeth Faust](#)  
**To:** [Thomas Pietrogallo](#)  
**Subject:** RE: How do ADAP, ACA, Ryan White Part A interplay with 340B? [ ref:!00Dj00KRDh.!5005b02Eudqb:ref ]  
**Date:** Thursday, July 11, 2024 2:01:12 PM

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Thomas,

It was so nice speaking with you today. As discussed, as an STD grantee you can use 340B drugs to fill prescriptions for your eligible patients, that also happen to be eligible for the state ADAP program. Currently, your STD grantee type provides you with the 340B discount up front, so you would not request a rebate for that drug from the state ADAP program (as you are currently doing), since that will come from billing the patient's insurance.

Also, the 340B statute does not prohibit a CE from using 340B for a patient that also receives/uses a copay assistance card. Below is a HRSA FAQ regarding ADAP covered entities, which I know you are not, but it clarifies how you can still provide 340B drugs to your patients that are also ADAP eligible. Please let me know if you have any additional questions.

### **FAQ 1407**

Title

ADAP, 340B entity, duplicate discount

Question

Do covered entities that serve ADAP patients have a reporting responsibility to the state ADAP program to assist them in avoiding collection of a rebate on 340B drug claims? Can a covered entity use 340B drugs for eligible ADAP patients?

Answer

ADAPs are prohibited from seeking a rebate on a drug that was purchased at or below the 340B ceiling price. Covered entities using 340B drugs at point of purchase for ADAP patients should work with ADAPs and abide by all ADAP mandated 340B transactional reporting requirements. **340B entities that are not ADAPs may fill prescriptions for their eligible 340B patients who may also be eligible for the state ADAP program.**

### **Elizabeth Faust, MHA, 340B ACE**

340B Purchasing Compliance and Optimization Director  
(She/Her/Hers)

Apexus

290 E John Carpenter Frwy, 4th Floor  
Irving, TX 75062

----- Original Message -----

**From:** Elizabeth Faust [[elizabeth.faust@apexus.com](mailto:elizabeth.faust@apexus.com)]

**Sent:** 7/10/2024, 11:51 AM

**To:** [tpietrogallo@poverello.org](mailto:tpietrogallo@poverello.org)

**Subject:** How do ADAP, ACA, Ryan White Part A interplay with 340B? [ ref:!00Dj00KRDh.!5005b02Eudqb:ref ]

Thomas,

We appreciate you contacting Apexus Answers. I received your 340B questions and would like to set up some time with you to discuss. Below is a link with my availability, please select a meeting time that works best for you. We should be able to cover this topic in 30 minutes or less. I look forward to speaking with you soon.

? [Pick a time for Escalation Discussion](#)

Thanks,

**Elizabeth Faust, MHA, 340B ACE**

340B Purchasing Compliance and Optimization Director  
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----- Original Message -----

**From:** ApexusAnswers [apexusanswers@apexus.com]

**Sent:** 7/10/2024, 9:34 AM

**To:** tpietrogallo@poverello.org

**Subject:** RE: How do ADAP, ACA, Ryan White Part A interplay with 340B? [ref:!00Dj00KRDh.!5005b02Eudqb:ref ]

Hi Thomas,

Thank you for contacting Apexus Answers,

ADAP is unique in the 340B Program and requires guidance from a Policy & Compliance Director. Please be aware that your inquiry has been escalated and a Policy & Compliance Director will follow up with you to discuss this further.

Warmest regards,

**Lara Castillo, 340B ACE**

340B Sr. Specialist, Apexus Answers

Apexus

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----- Original Message -----

**From:** Thomas Pietrogallo [tpietrogallo@poverello.org]

**Sent:** 7/3/2024, 2:50 PM

**To:** apexusanswers@apexus.com

**Subject:** How do ADAP, ACA, Ryan White Part A interplay with 340B?

You don't often get email from tpietrogallo@poverello.org. [Learn why this is important](#)

Hi,

As an STI grantee, we sometimes come across participants who have a patchwork of payors assisting with their drug and care costs.

Like:

ADAP may help enroll the client into ACA.

Ryan White Part A might help with co-pays.

We help with other co-pays and other expenses.

Is there a prohibition from 340b participation when a client is partially funded by ADAP in Florida?



ref:!00Dj00KRDh.!5005b02Eudqb:ref

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