

340B PROGRAM**1.1**

The Poverello Center, Inc. is committed to using 340B program savings to expand access to affordable medications and broadly improve the health outcomes of the program participants we serve. Our policies and procedures will adhere to all applicable laws, regulations, and guidance related to the 340B program. We will maintain accurate records, monitor compliance, and work collaboratively with our partners to maximize program benefits. Our goal is to provide high-quality, cost-effective comprehensive whole person care that meets the needs of our community.

COMPLIANCE

To comply with the 340B program, covered entities (grantees) that participate in the program must adhere to a set of policies and regulations. Here are some of the important policies that Poverello must follow:

1. **Eligibility:** Covered entities must maintain eligibility requirements for participation in the 340B program. This includes providing services to low-income patients or being an STI Clinic through Florida Health.
2. **Group Purchasing Organization (GPO) prohibition:** Covered entities cannot purchase drugs through a GPO if they plan on using the drugs for 340B eligible patients.
3. **Duplicate Discounts:** Covered entities must use reasonable efforts to prevent duplicate discounts from occurring when purchasing 340B drugs.
4. **Diversion Prevention:** Covered entities must establish procedures to prevent diversion of 340B drugs.
5. **Auditing and Monitoring:** Covered entities must audit and monitor their 340B program to ensure compliance with all program requirements.
6. **Record-Keeping:** Covered entities must maintain accurate records of all 340B purchases and patient utilization.
7. **Reporting:** Covered entities must submit annual reports to HRSA to demonstrate compliance with program requirements.

Authority

Section 318 of the Public Health Service Act authorizes STD funding. Projects under Section 318 are awarded to state and local health departments, academic, and public health organizations.

The U.S. Department of Health and Human Services' Centers for Disease Control and Prevention (CDC) oversees and funds the prevention of sexually transmitted diseases (STDs).

Poverello maintains a contract with Florida Health to provide STI testing and treatment which creates eligibility for The Poverello Center, Inc. to participate in the 340b discounted drug program.

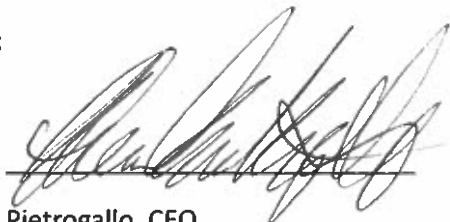
Eligibility Requirements**1.2**

POLICY – The Poverello Center, Inc. as a Covered entity (STI Clinic) shall maintain eligibility requirements for participation in the 340B program. This includes providing services to low-income patients.

To be eligible to participate in the 340B program as an STI clinic, The Poverello Center, Inc. ensures we meet the following requirements:

1. Is a non-profit private entity authorized by the state of Florida.
2. Maintains a contract with a state health department (Florida Health) to provide healthcare services related to the prevention or treatment of sexually transmitted infections.
3. Provides comprehensive primary health care services, which includes treatment of sexually transmitted infections, for underserved or uninsured populations.
4. Not a part of nor owned by a hospital that participates in the 340B program.
5. Ensures that all patients receiving 340B discounted drugs are eligible, which means that they must receive services from Poverello and be classified as program participants under the 340B program's patient definition.

Approvals:

Signature: 

Date: 7/19/24

Thomas S. Pietrogallo, CEO

BOD Approved Date: 07/17/2024

Date Established: 04/01/2023

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