

# NEW MEXICO CORRECTIONS DEPARTMENT



## 340B Drug Pricing Program

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# Outline

- ▶ Introduction: Why 340B in the NMCD
- ▶ Approval to Implement 340B pricing
- ▶ Program Implementation
  - Implications for Hep C Elimination project
  - Implications for current Medical Vendor
  - Implications for the ECHO Hep C tele clinic
- ▶ Ongoing/Next steps
- ▶ Questions

# Introduction

**Agency:** NMCD

**Mission:** Strengthen New Mexico communities through effective community supervision, creating safe and professional institutional environments and providing those entrusted to our care with opportunities for positive personal growth and self-development

**Description:** Set up processes to efficiently procure drugs through the 340B program that would offer improved access to high cost medications.



# NMCD 340B History

- ▶ Who qualifies for 340B drug pricing?
  - Program administered by the Health Resources and Services Administration under HHS
  - Designed to assist community-based providers that treat a large number of low-income and uninsured patients
  - Eligible providers are known as covered entities and include federally qualified health centers, Ryan White HIV/AIDS grantees, hospitals that serve a large number of Medicaid enrollees and uninsured individuals, and other safety net providers.
  - DOC's do not qualify as eligible providers.

# Additional Complications for Corrections

- ▶ 340B Rules stipulate a direct relationship between the covered entity and the patient.
  - Covered entity must keep a health record
  - Treatment is provided by an employee/contractor of the covered entity
  - Covered entity cannot only dispense the medications to the patient
- ▶ NMCD provides healthcare through a contracted provider

# NMCD's Early Work on 340B Pricing

- ▶ 2016 – Medical contract vendor is requested that the contractor obtain 340B pricing
- ▶ September 2017 LOA signed between Centurion Correctional Healthcare of NM and St. Vincent Hospital
  - St. Vincent Hospital provides care for HIV/AIDS patient's within NMCD through both face-to-face appointments and telemedicine
  - Medication dispensed through provider pharmacy and shipped to patients facility

# Implementing 340B pricing for Hep C medications

- ▶ Context – Elimination of Hep C in NM by 2030
- ▶ Collaborating with DOH to develop an Action Plan
- ▶ June 23 2020: Official approval/Welcome letter from HRSA
- ▶ June 29 2020: HSB staff attended HRSA Office of Pharmacy Affairs (OPA) "Welcome to the 340B Program Webinar."

# Implementing 340B pricing for Hep C medications continued

- ▶ July 1, 2020: NMCD officially became a “covered entity” under HRSA
- ▶ Effective date for contract pharmacy at approval was Oct 1, 2020.
- ▶ Request for a retroactive effective date of contract pharmacy granted on July 10, 2020.
- ▶ Development of a 340B compliance plan



# Implications for Hep C Elimination project

- ▶ More patients will have access to medication
- ▶ Need to increase resources to handle expected increase in number of patients treated
- ▶ Projected that number of Hep C patients treated will increase from 150 to about 600/yr

# Implications for current Medical Vendor

- ▶ Clinical guidelines for Hep C elimination require use of FibroScan
- ▶ New contract/agreement regarding implementation of 340B pricing for Hep C medications
- ▶ Contract pharmacy compensation options for dispensing and delivery of medications to facilities

# Implications for partnership with ECHO telehealth hep C clinic

- ▶ Development of Clinical guidelines for Hep C elimination
- ▶ New contract/agreement regarding implementation of Hep C elimination
- ▶ Increased collaboration with current medical vendor

# Implications for Inmates

- ▶ Currently everyone who requires treatment is being considered for treatment
- ▶ Reduced exposure to Hep C infection while incarcerated

# Ongoing / Next Step

- ▶ Securing FibroScan for use at the Intake facilities
- ▶ Clinical Protocols approval
- ▶ Approval of project ECHO and Wexford's Hep C elimination plans
- ▶ 340B pricing compliance committee work plan
- ▶ Optimal implementation of 340B pricing

# Questions

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Thank You!