MILLE LACS BAND OF OJIBWE HEALTH AND HUMAN SERVICES POLICY & PROCEDURE

Department: Health Services-Pharmacy		Policy Number: HHS-HS-PHM 1847	
Policy Title: 340B Program Education and Competency			
Attachments:			
Revision History: 9/27/2018		Revised by/Date: Jesse Godding 2/25/2020	
Approved by:		Date:	
Jesse Godding, Pharmacy Manager	7	4-21-2020	
Approved by:		Date:	
Nicole Anderson, Commissioner of HHS	ya	4-22-2020	

POLICY STATEMENT: Program integrity and compliance are the responsibility of all 340B key stakeholders, therefore, it is the policy of Mille Lacs Band of Ojibwe (MLBO) Indians, doing business as Ne-Ia-Shing (NIS) clinic that all 340B key stakeholders who are responsible for having the knowledge to guarantee compliant 340B operations, receive education and training on the 340B program.

PURPOSE: To establish 340B education and competency requirements for the MLBO 340B key stakeholders, based on their roles and responsibilities in the 340B Program.

PROCEDURE:

- 1. MLBO determines the knowledge and educational requirements for each 340B Program role, see 340B Program Roles and Responsibilities Policy
- 2. 340B key stakeholders complete initial basic training upon hire
 - a. Via the link https://www.brainshark.com/apexus/TopFive340BBasics
 - b. Attend 340B University or view the 340B University OnDemand modules on the Apexus website https://www.340bpvp.com/education/340b-u-ondemand/
- 3. MLBO provides educational updates and training, as needed for 340B policy changes and updates in HRSA guidance
- 4. MLBO conducts annual verification of 340B Program training
- 5. Training and education records are maintained per organization policy and available for review.

Internal and/or External References	HHS-HS-PHM 1848 340B Program Roles and Responsibilities	
Compliance - Posting Date	4/22/2020 (\$17)	
Replaces - Policy Number		
Next Review - Due Date	4/22/2021	