

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

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**Department:** Health Services-Pharmacy

**Policy Number:** HHS-HS-PHM 1840

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**Policy Title:** 340B Covered Entity Eligibility

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**Attachments:**

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**Revision History:** 9/27/2018

**Revised by/Date:** Jesse Godding 2/25/2020

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**Approved by:**

Jesse Godding, Pharmacy Manager



**Date:**

4-21-20

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**Approved by:**

Nicole Anderson, Commissioner of HHS



**Date:**

4-22-2020

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**POLICY STATEMENT:** Mille Lacs Band of Ojibwe (MLBO) Indians doing business as Ne-Ia-Shing (NIS) Clinic must meet the requirements of 42 USC §256b(a)(4)(A) to be eligible for participation in the 340B Program. This policy will be updated whenever there is a clarification or change in rules, regulations, or guidelines to the 340B program requirements or annually.

**PURPOSE:** To ensure MLBO NIS Clinic's eligibility to participate in the 340B program.

**PROCEDURE:**

1. MLBO's basis for 340B eligibility is determined by the following:
  - a) MLBO has a Tribal Contract/Compact with IHS (P.L. 93-638)
  - b) Ne-Ia-Clinic is a Federally Qualified Health Center (FQHC)
2. MLBO dispenses or prescribes 340B drugs from the following owned and operated locations:
  - a) Parent site
    - i. MLBO owned pharmacy at Ne-Ia-Shing Clinic at 43500 Migizi Drive, Onamia , MN 56359
  - b) Child sites
    - i. East Lake Clinic at 36666 Hwy 65, McGregor, MN 55760
    - ii. Aazhoomog Clinic (Lake Lena) at 45471 Grace Lake Road, Sandstone, MN 55072
    - iii. Four Winds Lodge Treatment Program at 11600 State Ave., Brainerd, MN 56401
  - c) MLBO does not use any contract pharmacies at this time.
3. MLBO ensures that the Health Resources and Services Administration (HRSA) 340B Office of Pharmacy Affairs Information System (340B OPAIS) is complete, accurate and correct for all 340B eligible locations. (340B Program Enrollment Recertification, and Change Request Policy)
  - a) All service sites that use 340B drugs are registered on the MLBO's HRSA 340B OPAIS
  - b) All main addresses, billing and shipping addresses, the authorizing official, and the primary contact information are correct and up to date.
  - c) MLBO regularly reviews its 340B OPAIS records. (340B Program Compliance Monitoring and Reporting Policy)
  - d) MLBO informs HRSA immediately of any changes to its information by updating the HRSA 340B OPAIS/Medicaid Exclusion File within 30 days.

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4. MLBO annually recertifies information on HRSA'S 340B OPAIS. (340B Program Enrollment, Recertification, and Change Request Policy)

<b>Internal and/or External References</b>	42 USC §256b(a)(4)(A)
	340B Program Enrollment, Recertification, and Change Request Policy
	HHS-HS-PHM 1846 340B Program Compliance Monitoring and Reporting Policy
<b>Compliance - Posting Date</b>	4/22/2020
<b>Replaces – Policy Number</b>	
<b>Next Review - Due Date</b>	4/22/2021