

ASAP 340B Core Principles Supporting HIV & STD Providers



ASAP
340B

Covered entities like Ryan White clinics, ADAPs, STD providers, and family planning clinics are among those that are often on the front lines providing access to affordable health care services, critical medications, and care coordination services to make patients' lives a little bit easier.

ASAP 340B's core principles reflect that all types of 340B grantee participants serve their communities as true safety-net providers, and we appreciate that many of these grantees engage subgrantees in critical work that is consistent with and substantially supports the aims of overarching grant funding. The core principles represent a path forward for stakeholders to find long-term solutions that stabilize and modernize the 340B program.



Intent of the Program

The 340B program is intended to support safety net providers serving low-income and vulnerable patients. The 340B program enables Ryan White clinics, ADAPs, STD providers, and family planning clinics serving as safety-net providers to better reach communities that otherwise would not have access to affordable health care services and the medications they depend on.



Contract Pharmacy

Ensure access to contract pharmacies by adding contract pharmacy to the 340B statute as well as necessary program integrity and accountability requirements. With clearer criteria on contract pharmacy arrangements and safeguards around duplicate discounts and diversion, grantees should generally continue to have access to contract pharmacies for eligible patients, including specialty and mail order pharmacies.



Protecting 340B Savings

Vertically integrated health care companies are abusing the lack of oversight in the 340B program. The core principles would prohibit pharmacy benefit managers (PBMs) and other for-profit middlemen from implementing discriminatory business practices that steal 340B savings from grantee covered entities providing HIV- and STD-related health care services.



Claims Data Clearinghouse

Create a neutral 340B clearinghouse to receive claims data for Medicare, Medicaid, and commercial payers. This clearinghouse can address future needs like implementation of the Inflation Reduction Act and ongoing challenges such as duplicate discounts in Medicaid managed care in a manner that is not burdensome on providers.



Patient Definition

Update the patient definition in the 340B statute to allow Ryan White clinics, ADAPs, STD providers, and family planning clinics to appropriately identify eligible 340B referrals as required by their grant for patients for which these providers demonstrate overall responsibility for care coordination. Many patients depend on these providers for affordable medicines and culturally competent services. Often, these providers serve as the only medical care in rural and remote areas.



Transparency

Develop reporting requirements to create more transparency and accountability for all 340B grantees in the program. Public reporting by all 340B covered entities of basic information related to their involvement in the program is critical to maintain the long-term integrity of the program and facilitate appropriate oversight.

**WE INVITE HIV & STD PROVIDERS TO WORK WITH ASAP 340B TO REALIGN THE 340B PROGRAM
IN THE INTEREST OF TRUE SAFETY-NET PROVIDERS AND THE COMMUNITIES THEY SERVE.**