

OPA Audit Findings of Violations of the GPO Exclusion

Audits began in FY12

- FY12: 51 audits, no findings of violating the GPO exclusion
- FY13: 94 audits, 1 finding of violating the GPO exclusion
- FY14: 99 audits, 9 findings of violating the GPO exclusion (9% of audits)
- FY15: 200 audits, 18 findings of violating the GPO exclusion (9% of audits)
- FY16: 198 audits, 10 findings of violating the GPO exclusion (5% of audits)
- FY17: 25 audits to date (6/1/2017), no findings of violating the GPO exclusion
- NOTE: audits include health centers, Ryan White centers, family planning clinics as well as hospitals.

Sanctions for all Covered Entities, except one were “Repayment to Manufactures.” The sanctions on Citrus Valley Medical Center (CA) were: Repayment to manufactures and Termination from the 340B Program. However, the Covered Entity self-terminated cited facilities prior to termination of facilities by OPA.

Entity	OPA Finding
FY13	
East Orange General Hospital (NJ)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to August 30, 2013.
FY14	
Bon Secours Maryview Medical Center (VA)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to March 12, 2015.
Coney Island Hospital (NYCHHC)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to January 1, 2014
DeKalb Medical Center, Inc. (GA)	Covered outpatient drugs were obtained through a Group Purchasing Organization.
Jacobi Medical Center (NY)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to September 2013.
Lincoln Medical & Mental Health Center (NYCHHC)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to February 3, 2014.
North Central Bronx Hospital Center (NYHCHHC)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to December 2013.
Queens Hospital Center (NYCHHC)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to September 2013.
Saint Alphonsus Regional Medical Center (Idaho)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to June 17, 2014.
University of Texas Medical Branch	Covered outpatient drugs obtained through a Group Purchasing Organization prior to August 9, 2013.

FY15	
Baystate Franklin Medical Center (MA)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to June 8, 2015.
Carle Foundation Hospital (IL)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to December 3, 2014.
Citrus Valley Medical Center (CA)	Covered outpatient drugs obtained through a Group Purchasing Organization.
Clara Maass Medical Center (NJ)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to March 31, 2015.
Clarendon Memorial Hospital (SC)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to April 29, 2015.
DeKalb Medical Center at Hillandale (GA)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to July 13, 2014.
Espanola Hospital (NM)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to March 15, 2015.
Florida Hospital	Covered outpatient drugs obtained through a Group Purchasing Organization prior to April 1, 2015.
Mercy General Hospital (CA)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to October 2014.
Metropolitan Hospital Center (NYCHHC)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to November 2014.
Monmouth Medical Center (NJ)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to March 26, 2015.
Montefiore (NY)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to June 15, 2015.
Plains Regional Medical Center – Clovis (NM)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to April 1, 2015.
Richardson Medical Center (LA)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to March 26, 2015.
Sierra View District Hospital (CA)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to April 15, 2015.
St. Mary Medical Center (CA)	Covered outpatient drugs were obtained through a Group Purchasing Organization.
Stony Brook University (NY)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to February 26, 2015.
Ventura County Medical Center (CA)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to December 4, 2015.
FY16	
Brooklyn Hospital Center	Covered outpatient drugs obtained through a Group Purchasing Organization from April 27, 2015 to January 4, 2016.
Hospital of the University of	Covered outpatient drugs obtained through a Group Purchasing Organization prior to April 21, 2016.

Pennsylvania, The	
Nassau Health Care Corporation (NY)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to January 4, 2016.
Nebraska Medical Center, The	Covered outpatient drugs obtained through a Group Purchasing Organization prior to November 21, 2015.
Northridge Hospital Medical Center (CA)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to April 11, 2016.
Saint Peter's University Hospital (NJ)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to February 23, 2016.
St. Johns Riverside Hospital (NY)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to November 16, 2015.
Summersville Memorial Hospital (WV)	Covered outpatient drugs obtained through a Group Purchasing Organization prior to April 4, 2016.
Tuality Healthcare (OR)	Covered outpatient drugs obtained through a Group Purchasing Organization from August 7, 2013 to July 30, 2016.