We appreciate your support as we work together to ensure the safety of our patients, and community at large. During the COVID-19 pandemic, many Ministries are shifting and expanding where they are delivering care. This creates unique considerations for 340B Ministries and eligibility of locations. As a reminder, for 340B eligibility:

- New locations (new cost center) within the 4 walls are not 340B eligible until they are on a filed cost report, so sites should use existing revenue centers for these locations, as they are then considered an expanded service

- New locations (new cost center) outside of the 4 walls are not 340B eligible until they are on a filed cost report and registered with the OPA, so sites should use existing revenue centers for these locations and register them as new locations between 4/1 and 4/15 and begin using 340B on 7/1
  - HRSA has changed their guidance on tents erected in parking lots and other temporary structures for patient care and does not have an expectation that they will be registered as child sites if they are temporary structures on the hospital property utilizing an existing service code from an eligible department, such as the ED
  - CEs are responsible for ensuring that any care delivered in these temporary locations, is documented, ideally in the same method used in the original department
  - Any Ministry adding a location outside of the 4 walls of the organization that is a non-temporary structure to care for patients due to Covid-19 should contact Apexus so HRSA may make a determination as to whether utilization of 340B drugs will be immediately allowed in that location, or if they must wait until the next quarter

- If new departments (new cost centers) are created that are not currently on an already-filed Medicare cost report, they will not be 340B eligible until they are on a filed cost report, and may require separate registration with the OPA to use 340B drugs

- If new locations (new cost centers) are created within the 4 walls of a 340B DSH hospital, drugs purchased in those locations will need to be purchased at WAC.

HRSA is continuing to offer guidance during this pandemic, and their current guidance is located [here](#).