

<b>Institutional Handbook of Operating Procedures</b> <b>Policy 09.14.06</b>	
Section: Clinical Policies	Responsible Vice President: Executive Vice President and CEO Health System
Subject: Pharmacy	Responsible Entity: Pharmacy Services

**I. Title**

*Education and Competency in the 340B Drug Pricing Program*

**II. Policy**

Program integrity and compliance are the responsibility of all 340B key stakeholders and staff. Ongoing education and training are needed to ensure that 340B key stakeholders and staff have the knowledge to guarantee compliant 340B operations.

**III. Purpose**

To establish 340B education and competency requirements for UTMB 340B key stakeholders and staff, based upon their roles and responsibilities in the [340B Program](#).

**IV. Procedures**

- A. UTMB determines the knowledge and educational requirements for key stakeholders (IHOP – [09.14.05 – Roles and Responsibilities in the 340B Drug Pricing Program](#)) and staff.
- B. 340B Key stakeholders, the [Authorizing Official](#), and members of the 340B Compliance Committee complete training.
  1. 340B The Basics ( <https://vimeo.com/393313129> ) will be completed annually.
  2. UTMB’s 340B online training module will be completed annually.
  3. Specific stakeholders will complete additional training and will attend the 340B University or complete the 340B University OnDemand program every three years including the 340B Program Director, Associate Vice President & Deputy Chief Compliance Officer, Associate Vice President Pharmacy Services, Primary Contacts, Senior Business Operations Manager, and Senior Pharmacy Manager.
  4. In addition, the 340B Program Manager will obtain Apexus Advanced 340B Operations Certificate program within 12 months of hire.
- C. UTMB provides educational updates and training as needed to address 340B policy changes, updates in [Health Resources and Service Administration](#) (HRSA) guidance, legislative changes, etc.
  1. A variety of teaching methods, materials, and tools are utilized to instill knowledge and awareness including policies, email notifications, e-learning courses using UTMB’s online training platform, and publications (e.g., weekly relay notes). In addition, 340B resources are posted on the Office of Institutional Compliance’s website.
  2. Staff in designated roles (e.g., pharmacy staff) are required to complete UTMB’s 340B online training program annually.

- D. UTMB conducts annual verification that 340B training is completed.
1. All persons in supervisory positions are responsible for ensuring that each UTMB employee reporting to them has completed training applicable to that person.
  2. Managers and supervisors are responsible for informing employees of compliance policies and procedures specifically related to their job function and appropriately monitoring employees to help ensure adherence to policies and procedures.
  3. Training and education records are maintained per organizational policy and are available for review.
    - a. The UTMB Human Resources Department maintains records of all courses completed on UTMB’s online training platform for employees.
    - b. Summary reports of compliance with education and training requirements are available to Managers and provided to the Executive Institutional Compliance Committee.

**V. Related UTMB Policies and Procedures**  
[IHOP - 06.00.00 - Institutional Compliance Plan](#)

**VI. Dates Approved or Amended**

<i>Originated: 04/10/2019</i>	
<i>Reviewed with Changes</i>	<i>Reviewed without Changes</i>
10/15/2020	
03/02/2023	

**VII. Contact Information**  
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 (936) 494-4188