

# 340B Compliance Checklist

## Audit Readiness Built into Everyday Operations

Strong 340B programs rely on consistent workflows, accurate documentation, and proactive oversight integrated into everyday operations. This checklist highlights key areas to review to help reduce risk and support confident audit readiness.



### Accurate and Up to Date OP AIS Records

- Contract pharmacies reflect active operational status
- Authorizing Official, Primary Contact, Entity Sites, and Contract Pharmacies



### Patient & Prescription Eligibility

- Claims support 340B patient definition
- Prescriptions from eligible providers with documentation



### Medicaid & Duplicate Discount Prevention

- Carve-in/out status validated
- Safeguards in place to prevent duplicate discounts



### Contract Pharmacy Documentation

- Fully executed agreements on file



### Policies & Procedures

- Reviewed and updated annually
- Match day-to-day workflows



### Purchasing Reconciliation

- All wholesaler accounts documented
- Purchases reconciled to detect diversion



### Prior Audit Documentation

- Previous audit materials retained and accessible

