

340B DRUG PRICING PROGRAM

experience **guidance** // The 340B drug pricing program aims to increase eligible patients' access to drugs and reduce pharmaceutical costs for safety net providers. Several types of providers can participate and have arrangements with multiple contract pharmacies. Due to increased participation and claims that the program lacks oversight, the Health Resources and Services Administration (HRSA) is focused on the program's regulation by adding more staff and auditing entities. **Experience expertise from industry professionals who can help you implement and monitor compliance for your 340B drug program.**

HOW WE CAN HELP

BKD's advisors have a range of industry knowledge from working with thousands of health care providers throughout the country. We understand the 340B drug pricing program and have the specialized skills to share best practices and offer insight. We also understand the financial demands health care organizations face and can help identify opportunities and provide practical compliance recommendations that go beyond the basic service approach.

OUR 340B SERVICES

INDEPENDENT 340B AUDITS // BKD performs independent external 340B audits for covered entities throughout the country. 340B-covered entities are expected to conduct external audits. Our process helps review multiple aspects of 340B, from policies and procedures to eligible dispensations. These procedures are designed as a mock audit to simulate an HRSA audit. It's increasingly important to have accurate, complete and auditable records to maintain compliance and identify the program's key risks. Our process assists with identifying additional program opportunities and risks while helping entities create precise and compliant audit trails.

OPERATIONAL SERVICES // BKD's 340B team has the expertise to provide operational knowledge and recommendations that help covered entities increase

savings and maintain compliance. Our team has experience with most split-billing vendors, wholesalers and billing systems. We understand the complexities of building and maintaining a 340B program. Clients request our help with many different aspects of their 340B program, including—but not limited to—registration assistance, policy and procedure development, child site review and maximization, development of contract pharmacy arrangements and split-billing software implementation assistance and optimization.

CONTINUAL MONITORING // BKD can help provide continual monitoring, which allows 340B-covered entities to assess the risk associated with compliance, test split-billing software and review of 340B accumulation factors that potentially reduce savings. Continual monitoring also is needed for covered entities that have self-reported compliance issues and are required to pay back savings to a manufacturer. The process allows these entities to continue purchasing 340B drugs, repay manufacturers and get back on track for 340B compliance.

REGULATORY CHANGES // The 340B program has seen significant changes and will likely see increased regulation and HRSA oversight in the future. As your 340B advisor, BKD can help you maintain compliance with both existing program rules and regulations and new ones.

BKD offers timely, efficient and objective services from knowledgeable professionals dedicated to delivering unmatched client service.

FOR MORE INFORMATION // For a complete list of our offices and subsidiaries, visit bkd.com or contact:

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