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Comprehensive 340B Services to Assist Healthcare Organizations



For many healthcare organizations serving at-risk populations, the 340B Drug Pricing Program offers a significant source of cost savings. In recent years, the U.S. Health Resources and Services Administration (HRSA) has increased its scrutiny of healthcare organizations to ensure compliance with the myriad of regulations and to reduce potential fraud. Healthcare organizations that aren't conducting sufficient monitoring and oversight run the risk of disqualification from the 340B Program. CHAN Healthcare has worked with hundreds of healthcare organizations to help them retain this benefit, improve their bottom lines, and enhance ongoing monitoring capabilities.

Complicating Factors in 340B Program Management

Frequent changes to the complex 340B Program regulations have made it difficult for organizations to stay up to date and in compliance. Healthcare organizations using a contract pharmacy to handle the 340B Program, for example, often believe they are shielded from risk, but in fact they are ultimately responsible for any irregularities. In addition, HRSA has issued guidance recommending that healthcare organizations in a contract pharmacy arrangement perform independent audits on an annual basis to document their administration of this complex program. As a knowledgeable third-party, CHAN Healthcare can support healthcare organizations by conducting audits and by bringing industry expertise to optimize their 340B Programs.

Unmatched 340B Consulting Services to Help Healthcare Organizations Pursue Business Goals

With an unrivaled depth and breadth of industry experience, CHAN Healthcare can help healthcare organizations assess their processes, improve internal systems and controls, and develop enhanced capabilities to monitor 340B Programs. Our multidisciplinary teams, which include auditors, data analysts, and subject matter specialists, assist healthcare organizations in their efforts to:

Manage Risk. Although HRSA has stopped short of disqualifying healthcare organizations from the 340B Program, more active enforcement places healthcare organizations at increased risk. Our professionals can work with healthcare organizations to identify and manage risk and implement new processes.

Generate Additional Revenues. Many healthcare organizations have shut down their 340B Programs rather than expose themselves to risk, while others have had to focus on compliance rather than optimizing revenues from the program. Our comprehensive knowledge of 340B Program regulations can help uncover opportunities to expand the program, increase cost savings in the process, and manage compliance more effectively.

Tap Data Analytics Capabilities. CHAN Healthcare can deploy data analytics to streamline a range of tasks. Our teams review all transactions data, test exceptions, and make recommendations to improve program monitoring. In addition, with our knowledge and assistance, healthcare organizations can seamlessly assess existing systems and develop strategies to improve operational performance.

Maximize the Impact of 340B Programs

As HRSA or other governmental agencies release new guidance on the 340B Program, healthcare organizations must be prepared to adapt their processes once again. CHAN Healthcare has served as a qualified independent auditor or adviser to healthcare organizations across the United States. With our expertise, healthcare organizations can conduct effective program monitoring, position themselves to maximize 340B Program cost savings, and be well-prepared to comply with HRSA regulations.

In-Depth 340B Program Audits to Assist Healthcare Organizations

CHAN Healthcare has performed hundreds of audits and assessments for healthcare organizations, giving our specialists firsthand knowledge of 340B Program issues as well as effective solutions. Our comprehensive assessments can be tailored for an in-house or contract pharmacy setting and typically focus on the following areas:

- Business processes, including policies and procedures, patient definitions, and system configuration
- Enrollment and vendor contracts
- Diversion of 340B drugs to ineligible patients
- Duplicate discounting
- GPO exclusion requirement
- Identification and definition of all eligible patients and drugs
- Problems with split-billing software
- Oversight of contract pharmacy activity, inventory balances, and contract compliance
- Duplicate dispenses
- Replenishment of 340B drugs, including NDC-to-NDC matches
- Orphan drugs
- Monitoring and reporting of 340B transactions
- Identification of missed opportunities to receive 340B discount

These detailed assessments provide management with the information and results needed to make better strategic decisions.



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About CHAN Healthcare

Formed in 1997, CHAN Healthcare provides internal audit and targeted consulting services to more than 700 hospitals and healthcare organizations across the country. Our collaborative approach and operating philosophy make us an industry leader in internal audit and risk consulting services focusing on improving healthcare system operations.

Crowe Horwath LLP, The Unique Alternative®

Crowe Horwath LLP (www.crowehorwath.com) is one of the largest public accounting and consulting firms in the United States. Under its core purpose of “Building Value with Values,®” Crowe uses its deep industry expertise to provide audit services to public and private entities while also helping clients reach their goals with tax, advisory, risk, and performance services. With a total of more than 3,000 personnel, Crowe and its subsidiaries have offices coast to coast. The firm is recognized by many organizations as one of the country’s best places to work. Crowe serves clients worldwide as an independent member of Crowe Horwath International, one of the largest global accounting networks in the world, consisting of more than 150 independent accounting and advisory services firms in more than 100 countries around the world.

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