

# Federally Qualified Health Center (FQHC) Checklist



**DOWNLOAD FQHC CHECKLIST:** [340bpvp.com/tools](https://340bpvp.com/tools)

This checklist outlines compliance and operational considerations for new 340B-registered health centers and is a resource for existing health centers to review their program setups periodically.

## **GETTING STARTED – Part I (Goal: complete within 3 weeks of registration start date)**

- ❑ Confirm that your entity's information is correct on the HRSA Office of Pharmacy Affairs Information System (OPAIS). [340Bopais.hrsa.gov](https://340bopais.hrsa.gov)
- ❑ Establish your entity-specific policy and procedure manual. See Community Health Center Sample 340B Policy and Procedure Manual. [340bpvp.com/tools](https://340bpvp.com/tools)
- ❑ Contact your wholesaler to ensure that your 340B account is correctly set up to receive best pricing [Public Health Service (PHS)/340B pricing and 340B Prime Vendor Program (PVP) contracts] after becoming active on OPAIS.
- ❑ Check with your internal legal department to ensure that all necessary contracts are reviewed and executed prior to starting any operations.
- ❑ Watch 340B University OnDemand for Health Centers™. Register at Covered Entities; select FQHC; New User. [340bpvp.com/ondemand](https://340bpvp.com/ondemand)
- ❑ Identify which drug inventory model works best for your entity – physical versus virtual versus physician/clinic-administered medications. [340bpvp.com/ondemand](https://340bpvp.com/ondemand) Module: 340B Drug Delivery Models
- ❑ Identify all areas where you use 340B drugs. See 340B Universe Mapping Template. [340bpvp.com/tools](https://340bpvp.com/tools)

## **GETTING STARTED – Part II (Goal: complete during the next 3–6 weeks)**

- ❑ Identify and inform the individuals in your entity who need to be directly involved in your 340B program (e.g., compliance, purchasing, billing). See 340B FTE and Coordinator Job Description Template. [340bpvp.com/tools](https://340bpvp.com/tools)
- ❑ Forward your purchasing individual's contact information to 340B PVP Membership Services so we can keep that person up to date with the 340B PVP Contract Updates newsletter. [apexus340bpvp@340bpvp.com](mailto:apexus340bpvp@340bpvp.com)
- ❑ Access your PVP pricing catalog through the secure PVP website portal. If you need assistance, please call Apexus Answers. Watch navigation videos. [340bpvp.com/website-tutorials](https://340bpvp.com/website-tutorials) and [340bpvp.com/register/secure-website-access](https://340bpvp.com/register/secure-website-access)
- ❑ Review and consider enrollment in the 340B PVP vaccine program (must be signed into the PVP secure portal). [340bpvp.com/vaccine](https://340bpvp.com/vaccine)

# Federally Qualified Health Center (FQHC) Checklist (continued)

## NEXT STEPS (6 weeks–9 months)

- ❑ Create a material breach policy for your entity. See Establishing Material Breach Threshold Tool. [340Bpvp.com/tools](https://340Bpvp.com/tools)
- ❑ Communicate your use of 340B savings to internal leadership using the Calculating 340B Net Financial Impact and Use of Savings Template. [340Bpvp.com/tools](https://340Bpvp.com/tools)
- ❑ Review the 340B Prime Vendor education tools for additional resources. [340Bpvp.com/tools](https://340Bpvp.com/tools)
- ❑ Attend 340B University; see important dates. [340Bpvp.com/university](https://340Bpvp.com/university)
- ❑ Develop internal and external audit plans. [340Bpvp.com/tools](https://340Bpvp.com/tools)

## ONGOING PROGRAM COMPLIANCE AND 340B PROGRAM OPTIMIZATION

- ❑ Recertify: HRSA requires you to recertify your entity annually. (View the HRSA recertification webinar and contact a 340B specialist at Apexus Answers for additional assistance) [340Bopais.hrsa.gov](https://340Bopais.hrsa.gov)
- ❑ Review annually: 340B compliance committee reviews policies and procedures for applicability and appropriateness.