**Purpose:** The purpose of this tool is to provide a sample 340B dispense tracking log for clinic- and/or physician-administered 340B drugs in a physical inventory when an electronic tracking option is not available to maintain auditable records.

**Instructions:** This tool includes data points needed to document key aspects of 340B Program compliance related to inventory management. It can be used to help document the 11-digit National Drug Code (NDC) record from point of purchase to point of use, including documentation of loss or waste. Covered entities that use this tool should tailor the log to meet their own unique needs for maintaining auditable records.

* Each row of this log represents a single inventory transaction (either product received and added to inventory or product removed from inventory for either patient use or expired/wasted items). Users should document as much information as possible about the source or use of the medication in order to accurately tie it to purchasing records or patient medical records.
* After each transaction, the amount remaining on the shelf is recorded. The last column is offered as an opportunity to document periodic verification of this process through inspection of the ledger captured in this document and the inventory remaining on the shelf. The timeframe for how often this task is completed is at the discretion of the site, but should be documented in the entity’s policies and procedures.

*This tool is written to align with Health Resources and Services Administration (HRSA) policy, and is provided only as an example for the purpose of encouraging 340B Program integrity. This information has not been endorsed by HRSA and is not dispositive in determining compliance with or participatory status in the 340B Drug Pricing Program. 340B stakeholders are ultimately responsible for 340B Program compliance and compliance with all other applicable laws and regulations. Apexus encourages all stakeholders to include legal counsel as part of their program integrity efforts.*

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**Medication Tracking Log**

**Entity Name or Clinical Site of Care: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Medication Name/NDC:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

| Date of Transaction | Description of Transaction:   * When adding medication to inventory, record invoice number * When removing medication from inventory, include patient ID/chart # or documentation of waste | Quantity of Drug Received (+) | Quantity Dispensed/ Wasted  (–) | Ending Amount On Hand | Lot # of Medication | Expiration Date | Staff  Documenting Transaction | Prescriber’s Name | On-Hand Reconciliation Date and Initials |
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