

FQHC 340B Compliance

340B Rebate RFI Response Calculator Guide

Purpose of This Tool

The 340B Rebate RFI Response Calculator Guide is designed to help estimate the **administrative effort, staffing costs, and operational burden** required to manage a 340B program. It is particularly focused on documenting:

- Current 340B administrative costs
- Incremental burden caused by **manufacturer restrictions**
- Anticipated additional costs under a **rebate-based 340B model**

This tool supports planning, internal decision-making, and external documentation. It is **not intended for audit or accounting certification purposes**.

Before You Begin – Important Notes

- **You do NOT need to complete every field**
 - This calculator is intentionally flexible. Complete **only the fields where you have reliable data or reasonable estimates**. The tool will still produce useful insights even if some sections are left blank.
 - **Yellow cells are for user input**
 - Only enter information into cells shaded **yellow**. All other cells are either:
 - Automatically calculated, or
 - Locked reference fields and should not be edited.
 - **Estimates are acceptable**
 - Exact data may not be available for all elements—especially staffing time or future rebate-model impacts. Best estimates based on experience, prior years, or vendor guidance are appropriate.
-

What Data Do You Need?

Each worksheet includes **suggested data sources** to make completion easier.

You may use alternative internal sources if they are more accurate or readily available.

- Filed **2025 UDS report**
- Payroll or HR records (wages, fringe, FTE allocations)
- Contracts or invoices from TPAs, consultants, auditors, or legal counsel
- Annual utilization and financial reports from:
 - Contract pharmacies
 - Entity-owned pharmacies
 - Clinic-administered drug tracking systems
- Manufacturer impact or exclusion reports
- Vendor estimates related to rebate-model requirements

How to Use Each Section

1. 340B Program Snapshot

- Provides a **high-level summary** of your 340B program, including patients served, prescription volume, costs, savings, and lost opportunity.
- Intended to help provide requested responses to RFI questions and provide additional context for your organization.

2. UDS Data

- Aligns calculator inputs with standardized **UDS reporting fields**.
 - Pull directly from the UDS report, if available.

3. Staffing Data

- Captures staff time dedicated to 340B program management and oversight
- Consider all areas that support the organization's 340B Program, such as compliance, finance, operations, pharmacy, IT, and legal staff.
- Fractional FTEs are acceptable.

4. External Consultants

- Fees associated with external vendors.
- Do not worry about any categories that are not relevant to your organization.

5. Admin & Dispense Data

- Enter the count and revenue totals from the financial reports from all TPAs, pharmacy software, and clinic administered drug tracking from 2025.
- Complete only the rows that apply to your organization.

6. Clinic-Administered Drug (CAD) Module

- Documents how clinic administered drugs are tracked, as well as any anticipated changes in costs associated with transitioning to a method more conducive to rebate model requirements.
- Skip this section if CAD tracking is not applicable.