



DISTRIBUTOR ACCREDITATION INELIGIBILITY MATRIX

Drug Distributor Accreditation & OTC Medical Device Distributor Accreditation

If an X appears by your facility type and your facility performs the corresponding activity, it is ineligible to pursue Drug Distributor Accreditation or OTC Medical Device Distributor Accreditation.

This Distributor Accreditation Ineligibility Matrix applies to all new applicants for accreditation. It is subject to change by NABP and facilities should review the matrix regularly to ensure they are utilizing the current version at the time of initial application for accreditation.

Activities <small>("Drugs" are prescription drugs; "Devices" are prescription devices and diagnostic OTC medical devices pursuant to a prescription)</small>	Wholesale Distributors	Reverse Distributor	3PL	503B <small>(does not purchase finished drugs for compounding)</small>	503B <small>(purchases finished drugs for use in compounding)</small>	Prescription medical device distributor <small>(no drugs or convenience kits with drugs)</small>	Prescription medical device distributor <small>(convenience kits with drugs)</small>	Repackager <small>(Does not take ownership)</small>	Repackager <small>(Takes ownership)</small>	Veterinary Drug Distributor <small>(distributes no human drugs)</small>	Veterinary Drug Distributor <small>(distributes human drugs)</small>	Samples Distributor	API Distributor/ Repackager	Investigational Drug Distributors	Manufacturers	Virtual Distributor	Virtual Manufacturers	OTC Medical Device Distributor
Co-locating applicant and pharmacy without adequate physical separation to secure drugs and devices.	X	X	X	X	X	X	X	X	X	X	X	X	X	X			X	X
Co-locating applicant and reverse distributor without adequate physical separation to secure drugs and devices.	X		X	X	X	X	X	X	X	X	X	X	X	X	X		X	X
Co-locating wholesale distributor and pharmacy without separate accounts to distinguish drug and device purchases made by the two entities.	X															X		X
Distributing adulterated, diverted, counterfeit, or illegitimate prescription drugs and devices	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Distributing for an unaccredited (NABP) wholesale distributor not purchasing directly from an FDA registered manufacturer	X		X	X												X		
Distributing for and/or sourcing from an unregistered FDA manufacturer			X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Distributing unapproved compounding kits	X		X	X	X		X		X	X	X	X	X		X	X		
Distributing unapproved drugs and/or devices	X		X	X	X	X	X		X	X	X	X	X		X	X	X	X
Located in a private residence	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Not storing controlled substances in accordance with DEA requirements	X	X	X	X	X		X	X	X	X	X	X	X	X	X		X	
Operating in a facility not of suitable size and construction to facilitate cleaning, maintenance, and proper distribution operations	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X			X
Subject to disciplinary proceedings contrary to program Terms and Conditions	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Unwilling to install and maintain a continuously operating electronic temperature/humidity recording and monitoring system	X		X	X	X	X	X	X	X	X	X	X	X	X	X		X	X
Unwilling to modify a business model that currently includes pharmacies in the supply chain	X		X		X	X	X		X		X		X	X		X	X	X
Unwilling to modify environmental controls to comply with regulatory and manufacturer label requirements (may require installing proper HVAC controls)	X		X	X	X	X	X	X	X	X	X	X	X	X	X		X	X
Unwilling to obtain documented rationale for number and location of temperature/humidity probes	X		X	X	X	X	X	X	X	X	X	X	X	X	X		X	X
Wholesaling 503B compounded products	X			X	X											X	X	
Unwilling to modify a business model that currently includes purchases not from a manufacturer or a WD that purchased from a manufacturer																		X

Please Note:

- When seeking licensure in states requiring either NABP accreditation or an active accreditation application, facilities must consider the time required for inspection completion and a decision by NABP whether the facility is eligible to pursue accreditation.
- All regulators may not accept a Supply Chain inspection to satisfy requirements. If this is a needed outcome for an applicant, it is suggested affirmative written confirmation from the regulator is obtained before submitting an application.
- Facilities must be operational for 30 days before completing an inspection.