

Beginning mid-2020, pharmaceutical manufacturers started overcharging covered entities (CEs) on 340B drugs shipped to CE contract pharmacies. This chart serves as a summary and timeline of these manufacturer restrictions.

Manufacturer Name	Type of Restriction	Who it Applies to	Effective Date
Eli Lilly	Refusing 340B pricing for drugs dispensed at contract pharmacies; recent changes allow 340B pricing if CEs submit contract pharmacy claims data. Any covered entity that doesn't have an in-house pharmacy can choose a single location contract pharmacy .	All covered entities (CEs)	September 1, 2020
AstraZeneca	Refusing 340B pricing for drugs dispensed at contract pharmacies. May designate a single contract pharmacy but each parent site can have one pharmacy site for itself.	All CEs	October 1, 2020
Sanofi	NEW for hospitals : Refusing to ship 340B-priced drugs to contract pharmacies regardless of data submission to 340B ESP. If a CE lacks an in-house, can select 1 contract pharmacy. Doesn't affect CHCs. Refusing 340B pricing for drugs dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that doesn't have an in-house pharmacy can choose	5 CE types: Consol, CHC, CAH, DSH, RRC, SCH	NEW for hospitals : Effective June 1, 2023 October 1, 2020

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	a single location contract pharmacy. If submitting data to 340B ESP, can choose unlimited contract pharmacies.		
Novartis	Refusing 340B pricing for drugs shipped to contract pharmacies more than 40 miles away from hospitals' parent sites	Hospitals only	November 16, 2020
Novo Nordisk	UPDATE: Will not allow hospitals to get 340B-priced drugs to unlimited contract pharmacies even if submitting to 340B ESP Previously, allowed hospitals to designate two contract pharmacies to receive 340B drugs (one specialty, one regular)	Hospitals only	January 1, 2021 <u>New restrictions effective July 1, 2023</u>
United Therapeutics	Phase 1: Orders for contract pharmacy drugs accepted only if CE made a “valid 340B purchase” during first three quarters of 2020. <u>Phase 2:</u> Then, refusing 340B pricing for drugs dispensed at all contract pharmacies, unless CE submits claims data.	All CEs	Phase 1: November 20, 2020 Phase 2: December 1, 2021
Boehringer Ingelheim	Will ship 340B drugs only to CEs and their child sites. Any covered entity that does not have an in-house pharmacy can choose one contract pharmacy to receive 340B drugs.	Hospitals, CHCs	August 1, 2021 As of September 1, 2022: Includes health centers
Merck	NEW: Will not allow multiple contract pharmacies to receive	Hospitals, CHCs	NEW: Effective June 12, 2023

Manufacturer Name	Type of Restriction	Who it Applies to	Effective Date
	<p>discounts even if CE submits data to 340B ESP. If a CE lacks an in-house pharmacy, can select 1 contract pharmacy within 40 miles of its parent site.</p> <p>Refusing 340B pricing for drugs dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy can elect one contract pharmacy at a single location.</p>		<p>September 1, 2021 As of May 31, 2022: Includes health centers</p>
<p>UCB</p>	<p>Will provide 340B priced drugs to locations registered as 340B covered entities or child sites. Any covered entity that does not have an in-house pharmacy can elect one contract pharmacy at a single location.</p>	<p>Hospitals only</p>	<p>December 13, 2021</p>
<p>Amgen</p>	<p>Refusing 340B pricing for drugs dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy can elect one contract pharmacy at a single location (single HIN) Update: Conditions have been placed on 340B sales and deliveries to covered entity in-house pharmacies. A hospital must designate a pharmacy by March 27.</p>	<p>Hospitals only</p>	<p>January 3, 2022 New restrictions: Effective April 11, 2023</p>

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	<p>If you do not have an in-house pharmacy, you can pick ONE contract pharmacy, AND you must share claims data AND the pharmacy must be within 40 miles of the parent.</p> <p>If you do have an in-house pharmacy, same rules (one pharmacy within 40 miles and must share data).</p>		
AbbVie	<p>Refusing 340B pricing for drugs dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy <u>can elect one contract pharmacy at a single location.</u></p>	Hospitals only	February 1, 2022
Pfizer	<p>Refusing 340B pricing for drugs dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy <u>can elect one contract pharmacy at a single location (single HIN)</u></p>	Hospitals only	March 1, 2022
Bristol Myers Squibb	<p>Refusing 340B pricing for “non-IMiD” (Immunomodulatory imide drug) products dispensed at contract pharmacies; modifying access to 340B pricing under IMiD limited distribution network. <u>Will recognize up to 2</u></p>	Hospitals for non-IMiDs; All CEs for IMiDs	March 1, 2022

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	contract pharmacies (one for non-IMiDs, another for IMiDs).		
GlaxoSmithKline	Refusing 340B pricing for drugs dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy may designate one contract pharmacy location (single HIN) to have drugs shipped to. Applies to all drugs (especially impacts inhalers and certain HIV drugs). See the updated letter applying to grantees here .	Hospitals, all grantees	April 1, 2022 New restrictions: Effective May 1, 2023
Gilead	Refusing 340B pricing for brand-name Hepatitis C drugs dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy may designate a single contract pharmacy location . Likewise, this update does not apply to contract pharmacies that are wholly owned by a covered entity or health system.	All CEs	May 2, 2022
Johnson & Johnson	Refusing 340B pricing for drugs dispensed at contract pharmacies; specifically: immunosuppressants, monoclonal antibodies, blood thinners, and treatments for diabetes, cancer, HIV, mental disorders,	Hospitals only	May 2, 2022 New restrictions: Effective March 7, 2023

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	<p>pulmonary arterial hypertension, and chemotherapy-induced anemia. If they choose not to submit data, <u>may still designate a single contract pharmacy location (single HIN).</u></p> <p>UPDATE: J&J has placed conditions on 340B sales and deliveries to covered entity in-house pharmacies. A hospital must designate a pharmacy by February 26; they define outside pharmacy as “a Ship To location that is not part of the Bill To purchaser”; If you do not have an in-house pharmacy, you can pick ONE pharmacy, AND you must share claims data AND the pharmacy must be within 40 miles of the parent. If you do have an in-house pharmacy, same rules (one pharmacy within 40 miles and must share data). Can also select a single specialty pharmacy for specialty drugs.</p>		
Exelixis	<p>Refusing 340B pricing for drugs dispensed at contract pharmacies, specifically Cometriq and Cabometyx (cancer drugs). If they choose not to submit data, <u>may still designate a single contract pharmacy location (single HIN).</u></p>	Hospitals only; grantees exempt “until further notice”	July 6, 2022

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Bausch	Refusing 340B pricing for drugs dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy <u>can elect one contract pharmacy at a single location (single HIN)</u>	All CEs	August 1, 2022
Biogen	Refusing 340B pricing for drugs, specifically Avonex and Plegridy (which treat multiple sclerosis), dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy can <u>designate one contract pharmacy location (single HIN)</u> to have drugs shipped to.	Hospitals only	February 1, 2023
Bayer	Refusing 340B pricing for drugs dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy can <u>designate one contract pharmacy (single HIN)</u> to have drugs shipped to. Drugs excluded from this restriction, for now, include: Adempas, Aliqopa, Jivi, Kerendia, Kogenate, Kovaltry, Kyleena, Lampit, Mirena, Skyla, Nubeqa, Xofigo. UDPDATE: Hospitals that lack an in-house pharmacy can	Hospitals only	March 1, 2023 New restrictions: Effective June 1, 2023

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	<p>designate one contract pharmacy location within 40 miles of the hospital parent site.</p> <p>Bayer will no longer let hospitals place replenishment orders for multiple contract pharmacies in exchange for submitting 340B claims to 340B ESP for Bayer drugs. Hospitals may voluntarily provide claims data for their single designated contract pharmacy through 340B ESP.</p>		
EMD Serono	<p>Refusing 340B pricing for drugs, specifically Refib (interferon beta-1a) and Gonal-f (follitropin alfa for injection), dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy can designate one contract pharmacy location (single HIN) to have drugs shipped to.</p>	Hospitals only	March 1, 2023
Organon	<p>Refusing 340B pricing for drugs dispensed at contract pharmacies if 340B contract pharmacy claims aren't submitted. Any covered entity that doesn't have an in-house pharmacy can designate one contract pharmacy location (single HIN) to have drugs shipped to.</p>	Hospitals only	July 1, 2023

