

HRSA’s 340B Rebate Model Pilot Program: 101 for Community Health Centers

Overview

Beginning January 1, 2026, all covered entities, **including community health centers (CHCs)**, must pay the full price upfront for selected drugs dispensed to 340B eligible patients under [HRSA’s 340B Rebate Model Pilot Program](#). This reverses the traditional 340B model in which discounts are applied upfront.

- All approved plans will issue rebates based on the unit level.
- Manufacturers must pay rebates within 10 days of receiving a claim.

Drugs and Manufacturers Approved for the Pilot

Ten drugs from nine manufacturers subject to the Medicare Drug Price Negotiation Program (MDPNP) for 2026 were approved to participate in the pilot:

Manufacturer	Selected Drug	Drug Indication
Bristol Myers Squibb	Eliquis	Anticoagulation
Immunex Corporation (Amgen)	Enbrel	Rheumatoid Arthritis & Psoriasis
Astra Zeneca AB	Farxiga	Diabetes
Pharmacyclics (Abbvie)	Imbruvica	Cancer
Merck Sharp Dohme	Januvia	Diabetes
Boehringer Ingelheim	Jardiance	Diabetes
Novo Nordisk Inc.	Novolog; fiasp*	Diabetes
Janssen Biotech, Inc. (J&J)	Stelara	Psoriasis, Crohn’s, & Ulcerative Colitis
Janssen Pharmaceuticals, Inc. (J&J)	Xarelto	Anticoagulation
Novartis	Entresto**	Heart Failure

*Novolog is also included in the [Insulin/Epi-Pen Terms and Conditions update](#)

** Novartis’s plan for Entresto was approved with a delayed implementation of April 1, 2026.

Rebate Logistics:

- **Real-time Claim Status:** CHCs should have access to the real-time status of a claim on Beacon, the platform used by the manufacturers for the pilot program, so they can easily reconcile claims submitted with rebates.
- **10-day Payment Window:** If a claim takes longer than 10 days to be paid, CHCs and manufacturers should work together to resolve the issue, per HRSA. If issues persist, notify [HRSA](#) by emailing 340Bpricing@hrsa.gov. NACHC will provide email templates to assist with reporting.
- **Payment Method:** Claims will be paid via ACH transfer to the CHC’s designated bank account.
- **Recordkeeping:** CHCs should maintain auditable records of purchases and rebate requests to ensure that only purchases made in the 340B wholesale account at the Wholesale Acquisition Cost (WAC) price are subject to rebate requests.

HRSA Approved Data Elements for Claims

Pharmacy Claims Data Fields	Medical Claims Data Fields
Date of Service	Date of Service
Date Prescribed	Claim Line Number
Rx number	Claim Number
Fill number	Unit of Measure
NDC-11	NDC-11
Quantity Dispensed	Quantity
Prescriber ID	Rendering Physician ID
Service Provider ID	Service Provider ID
340B ID	340B ID
RX BIN	Health Plan Name
RX PCN	Health Plan ID
Group Number ID (optional)	Health Plan ID Qualifier (optional)
	HCPCS Code (optional)
	HCPCS Modifiers (Up to 4) (optional)

Note: For medications dispensed to *uninsured patients*, Beacon has requested to input “CASH” for BIN and PCN fields

Action Steps for Community Health Centers

1. **Assemble your 340B rebate team**, which may include staff from pharmacy, finance, leadership, IT, operations, compliance, and legal.
 - CHCs will also want to work with your wholesaler, third party administrator (TPA), and contract pharmacies to prepare for implementation.
2. **Assess potential financial impact.** Community health centers with a PVP account on [Apexus, the 340B prime vendor](#), can pull their historical purchase report for the last two to three months and download that as an excel sheet. Using this file, they can compare 340B prices to WAC prices to understand the up-front costs associated with purchasing 340B rebate drugs.
3. **Begin setting up rebate operations, including registering for Beacon, the software platform, [here](#).** All drug manufacturers have chosen to use Beacon as their IT platform. CHCs should start the registration process early, as it may take several weeks.
 - CHCs will need to input their 340B ID. CHCs can select multiple 340B IDs to associate with your Beacon account
 - Beacon also asks covered entities to upload:
 - Entity Employer Identification Number (EIN)
 - Entity CP-575 Letter (IRS letter stating the EIN)
 - Articles of Incorporation
 - Entity W-9
4. **Identify and address unreplenished accumulations.** Purchases made before January 1, 2026 are not eligible for a rebate. All manufacturers encourage CHCs to replenish accumulations before January 1. Each manufacturer has different grace/discretionary periods and the ability to request exceptions if needed.
5. **Share with NACHC.** Notify NACHC at regulatoryaffairs@nachc.org of any challenges you experience as we continue to share the burdens of this program with HRSA. Concerns can also be shared with HRSA at 340BPricing@hrsa.gov.

Additional Resources

- [Slides](#) and [recording](#) from NACHC's Part 1 webinar on the rebate model
- [HRSA's FAQ webpage](#)
- [Beacon's Welcome Materials and Resource webpage](#)

Coming Soon! Check out NACHC's 340B Model Pilot webpage for additional resources regarding the pilot program, including a toolkit that will have: template letters to report issues to HRSA, frequently asked questions (FAQ) factsheet for clinical alternatives for rebate drugs, FAQ factsheet for contract pharmacies, advocacy talking points for Congress, and more!