

### **340B Rebate Model Pilot Program: Contract Pharmacy FAQs**

The Health Resources and Services Administration (HRSA) launched a [340B Rebate Model Pilot Program](#), beginning [January 1, 2026](#). HRSA initially approved eight manufacturer plans covering nine of the ten drugs eligible for the pilot and applied the rebate requirements to all covered entities, including community health centers (CHCs). Novartis has also received approval for its rebate model plan beginning April 1, 2026. All approved plans rely on the same IT platform, [Beacon 340B](#).

These frequently asked questions (FAQ) are designed to help CHCs understand the pilot structure and its impact on contract pharmacy operations.

#### **1. Can claims from any contract pharmacies be submitted by the community health center?**

- No, only claims originating from contract pharmacies that have been designated on 340B ESP or, in the case of states with protections in place, those pharmacies exempted by each manufacturer, may be submitted by the CHC to the Beacon 340B platform.
- If the contract pharmacy is eligible by designation or state exemption standards, you can submit contract pharmacy claims from contract pharmacies, so long as you are able to obtain and submit all required data elements.
  - Check with your contract pharmacies and TPA account managers to verify who may or may not be able to participate in the rebate process. This is likely to change with time as TPAs adapt technology to this new need.

#### **2. We are a contract pharmacy-only participant in 340B. Do we have to register for both the Beacon 340B Rebate Model and Beacon Maximum Fair Price (MFP)?**

- No, only dispensing entities register in the Beacon MFP platform, meaning those CEs with an entity-owned retail pharmacy. You do, however, need to register for the Beacon 340B Rebate Model Platform if you dispense any of the 340B rebate pilot drugs through your contract pharmacies and wish to seek rebates after purchasing them at the WAC on your contract pharmacy bill-to, ship-to account.

**3. We do NOT provide data to 340B ESP. Does that block our access to drugs in this 340B rebate pilot?**

- The Beacon 340B platform is a separate system from 340B ESP, even though they are both products of Second Sight Solutions. For drugs in the 340B Rebate Pilot Model, covered entities must submit claims to Beacon 340B instead of 340B ESP. Submission of claims through 340B ESP (or lack of claim submissions through 340B ESP) has no impact on the ability to seek rebates on the drugs managed in the Beacon 340B platform.
- The designation of contract pharmacies will continue to be managed on the 340B ESP platform. You do not need to register an account or submit data on 340B ESP to designate a contract pharmacy for the 340B rebate pilot model (<https://340besp.com/designations>).
  - Per the manufacturers, contract pharmacy policies still apply under the rebate model. If an entity is permitted one contract pharmacy under a manufacturer's policy, they must indicate their selected pharmacy by designating it on the 340B ESP. Only rebate claim requests submitted to Beacon 340B for pharmacies designated on the 340B ESP or exempted by state regulations will be eligible for rebate payment.
- Manufacturer restriction related data submissions for non-rebatable drugs remain on the 340B ESP platform (and the Truzo platform, for Alkermes drugs, beginning December 1<sup>st</sup>).

**4. What if the contract pharmacy model cannot support the Beacon requirements?**

- OPA has created a list of approved data elements that can be required by the manufacturer for participation in the 340B rebate pilot. If contract pharmacies or TPAs are unable to comply with these data requirements, these medications should be blocked from the impacted 340B arrangements until the contract pharmacy or TPA is able to meet OPA's approved data elements as required by the manufacturers.

**5. How would a CHC know which contract pharmacies are choosing to participate in the 340B rebate pilot?**

- Because of the short time for implementation and reduced margin potential, not all contract pharmacies may be willing or able to participate in the 340B rebate pilot. There is no single list available to determine who is participating and who is not. The best course of action is for CHCs to work directly with their TPAs and contract pharmacies.

**6. What email should we use for OPA/HRSA?**

- HRSA instructs covered entities to email [340BPricing@hrsa.gov](mailto:340BPricing@hrsa.gov).