



NATIONAL ASSOCIATION OF
Community Health Centers®

340B Rebate Pilot RFI Data Webinar

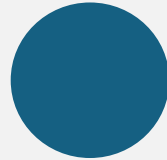
February 25, 2026



340B Rebate RFI & Calls

On February 13, HRSA released a [request for information](#) on the potential use of rebates in the 340B program. This comes after the failed attempt to launch a 340B rebate model pilot last year, which was halted by the courts due to a lack of an administrative record. **Comments are due April 20th**

February 25, 2-3PM ET



Today: Regulatory Affairs Office Hours

We will walk through a 340B rebate calculator and outline the types of data CHCs should include in comments to HRSA. We will also provide advice on framing your data to ensure it is clear, compelling, and aligned with the RFI. [Register here.](#)

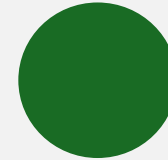
March 4, 3-4PM ET



Next Week: FAST Call

We will review anticipated themes and proposed recommendations and gather additional feedback from the field. Real-world examples and documented administrative burdens will be essential to strengthening our collective response. [Register here.](#)

March 12, 3-4pm ET



Two Weeks: 340B Office Hours

This session will serve as working office hours for people to bring questions about their draft templates, data inputs, and specific scenarios. NACHC's RA team and FQHC 340B Compliance will be available to provide technical assistance and feedback. [Register here.](#)

Second or Last Bite at the Apple?



What's Different this Time?

01

We have the approved manufacturer plans from October 2025.

02

HRSA is seeking to strengthen the administrative record in light of the AHA lawsuit.

03

This RFI has very specific questions and requires tailored data for each response.

04

This RFI raises the question of whether the rebate is only for IRA drugs.

Different Strategy, Different Results

Health Centers now have more information to provide specific details and data on the impact of a rebate model in the 340B program. We will use the first proposed rebate model details and the 2026 340B Rebate Model Pilot RFI questions to advocate for CHCs' exemption.



340B Rebate Model Pilot 1.0

- No insight into the data requirements and variation between manufacturers.
- Little insight into administrative and operational barriers.
- No opportunity to comment on the finalized proposal.



340B Rebate Model Pilot 2.0

- RFI has 7 categories of questions requesting specific feedback and data on the implementation and impact of the rebate.
- Health centers have more insight into the operational, financial, and administrative burdens related to a 340B rebate model.

How is NACHC Helping?

01

Financial Burden Calculator

02

Administrative Burden Calculator

03

Guidance to support data
prioritization and instructions

04

Template Comment Letter

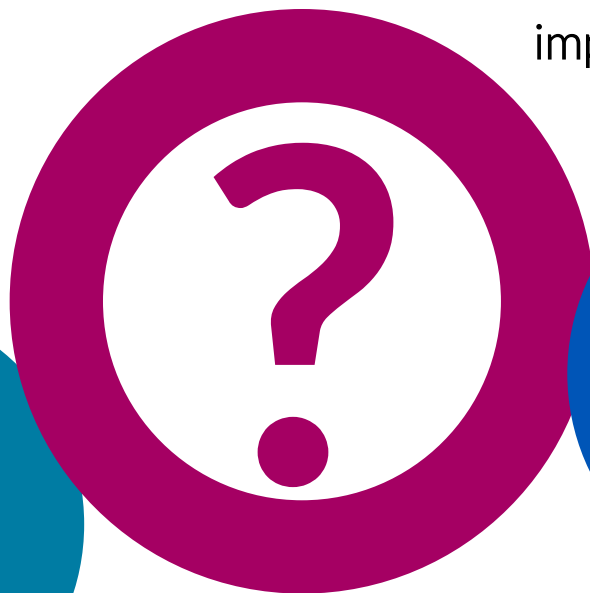
The NACHC Template is on the Way!

Loading...



What Data do CHCs need?

How do you make medications affordable?



How many patients benefit from your 340B program?

How has your CHC been impacted financially by contract pharmacy restrictions?



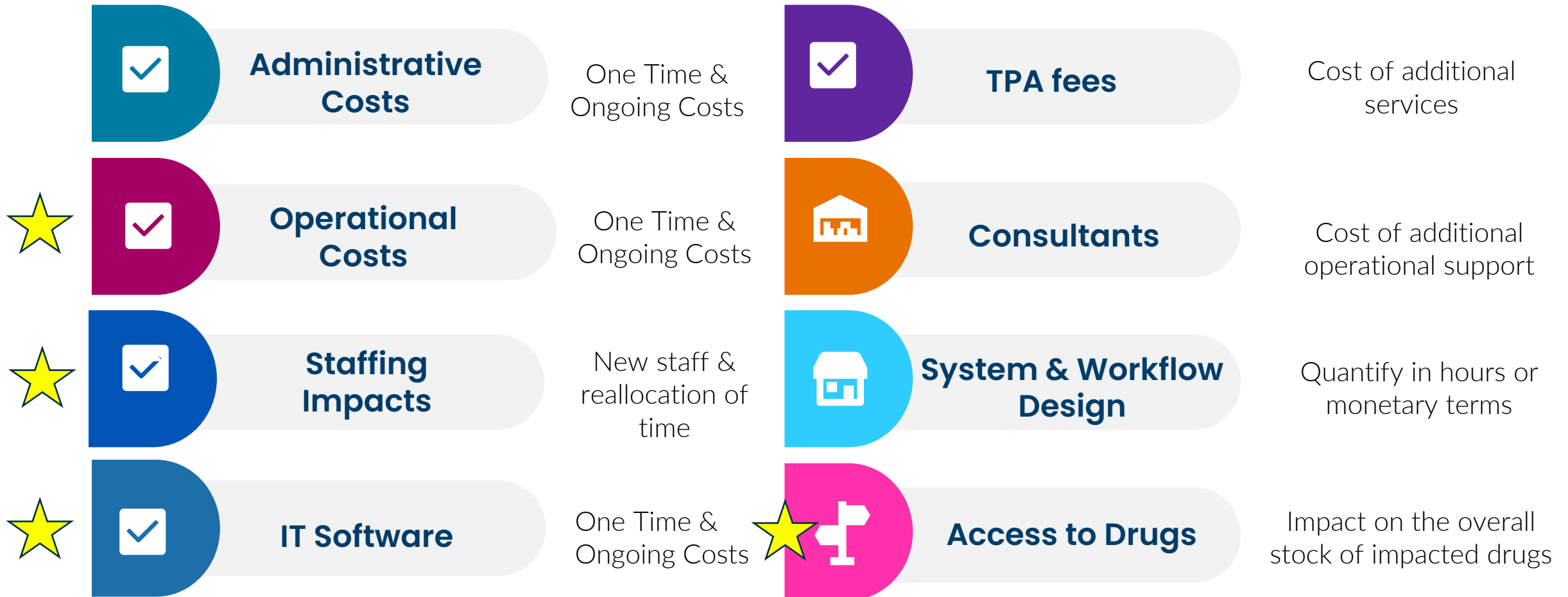
What specific services and programs are funded by 340B savings?



What communities do you serve?

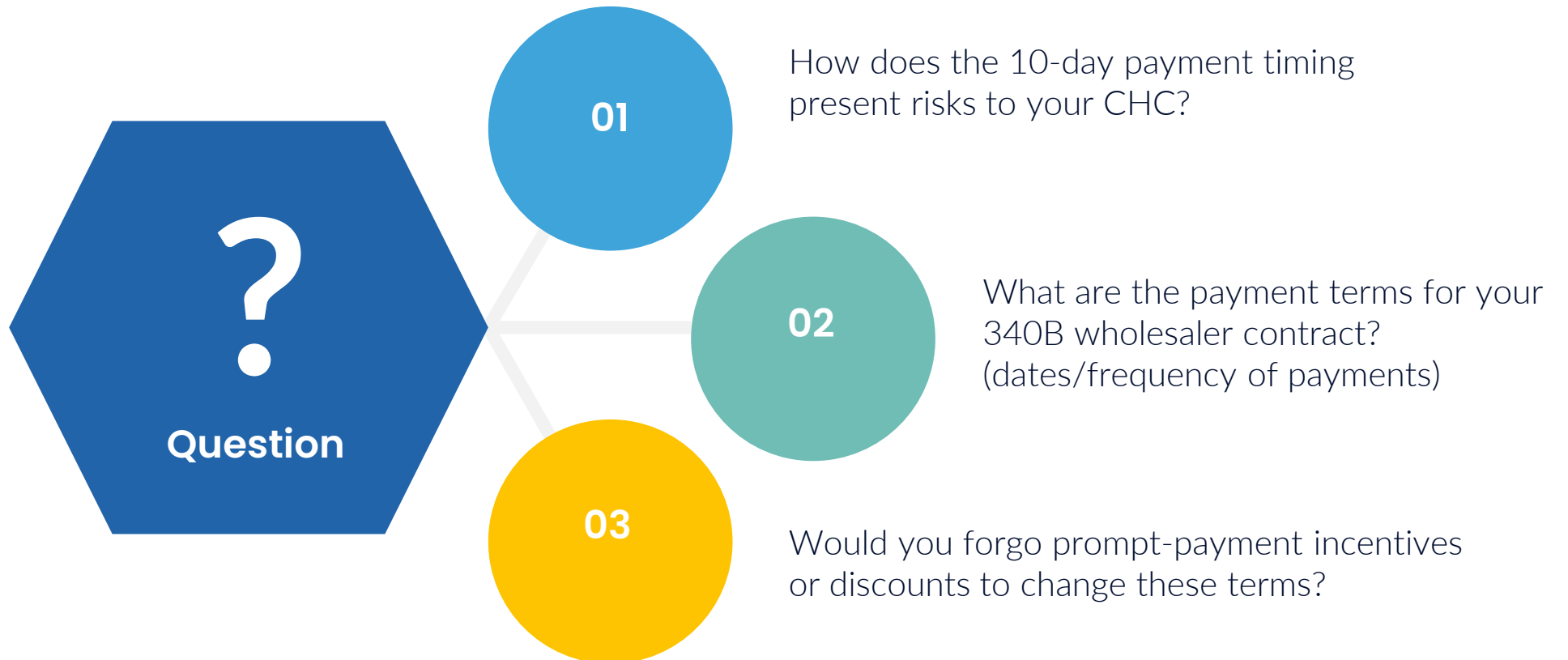
Costs to Your Health Center

Health Centers need to demonstrate to HRSA that implementing the Rebate Mode requires more than “incremental” administrative and operational costs.



Payment Timing & Cash Flow Data

HRSA is very interested in the role of drug wholesalers in supporting covered entities in navigating the 340B Rebate Model Pilot. It's important that the CHC response demonstrates the variety of contracting terms, payment arrangements, and overall impact on purchasing power.



Rebate RFI & Hot Topics



Rebate 2.0: Potentially 13 Manufacturers

From the ICR:

The scope of the potential 340B Rebate Model Pilot Program will be limited to manufacturers with Medicare Drug Price Negotiation Program Agreements with the Centers for Medicare & Medicaid Services' for the initial price applicability years 2026 and 2027.

Total Estimated Annualized Burden Hours:

Name	Number of Respondents*	Number of Responses per Respondent	Total Responses	Average Burden per Response (in hours)	Total Burden Hours
340B Rebate Model Pilot Program Plan Submission	13	1	13	8	104
Manufacturer monthly purchase reports	13	12	156	2	312
Covered Entities reporting claims data to third party platform	14,600	52	759,200	5	3,796,000
Total	14,613		759,369		3,796,416

*Potentially 13 manufacturers will submit Plans and Monthly Purchase Reports (first two rows, above), while the 14,600 Covered Entities will submit Claims Data (third row, above). Therefore, the total number of respondents is 14,613.

Manufacturer & Selected Drugs	Count
AbbVie	1
IMBRUVICA	
Allergan	2
LINZESS	
VRAYLAR	
Amgen	2
ENBREL	
OTEZLA; OTEZLA XR	
Astellas	1
XTANDI	
AstraZeneca	2
CALQUENCE	
FARXIGA	
Bausch & Lomb	1
XIFAXAN	
Boehringer Ingelheim	3
JARDIANCE	
OFEV	
TRADJENTA	

Manufacturer & Selected Drugs	Count
Bristol-Myers Squibb	2
ELIQUIS	
POMALYST	
GlaxoSmithKline	2
BREO ELLIPTA	
TRELEGY ELLIPTA	
Merck	2
JANUMET; JANUMET XR	
JANUVIA	
Novo Nordisk	2
OZEMPIC; RYBELSUS; WEGOVY	
NOVOLOG; FIASP	
Pfizer	1
IBRANCE	
Teva	
AUSTEDO; AUSTEDO XR	1
Grand Total	22

RFI: What is the Cost to Covered Entities?

-
- What are your current administrative costs for the 340B program?
 - What are your expected administrative costs under a rebate model?
 - What are the expected staffing impacts of a rebate model?
 - What systems & infrastructure changes will be required to comply with a rebate model?
 - What are the other anticipated costs or impacts?

CE Data to Collect: 340B Program Snapshot



OF CAPTURED 340B RETAIL
PRESCRIPTIONS IN 2025



OF 340B CLINIC
ADMINISTERED DRUG
TRANSACTIONS IN 2025



340B SAVINGS (REVENUE –
DRUG COST) IN 2025



340B SAVINGS DIRECTLY
ALLOCATED TO SLIDING FEE
SCALE IN 2025

CE Data to Collect: Current Administrative Costs

TPAs/Contract Pharmacies

- Administrative/Dispensing Fees

Pharmacy Software Module

- Cost of retail pharmacy software add-ons to manage multiple inventories or a virtual inventory

Medical Record Clinic Administered Drug Module

- Cost of add-on module or software to track and manage clinic administered drugs

Dedicated Staff - # of FTEs and Cost

Consultant/External Auditor Fees



CE Data to Collect: Anticipated Increase in Administrative Costs



What software/services would you need to add?



What staff would you need to hire/reallocate?



Would any of your vendor costs increase?



Would you need to hire any additional vendors/consultants?

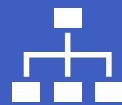
CE Data to Collect: Financial Impact of Existing Manufacturer Policies



of 340B Eligible Retail Prescriptions Uncaptured Due to MFR Restrictions in 2025



Lost 340B Savings from 340B Eligible Retail Prescriptions Uncaptured Due to MFR Restrictions in 2025

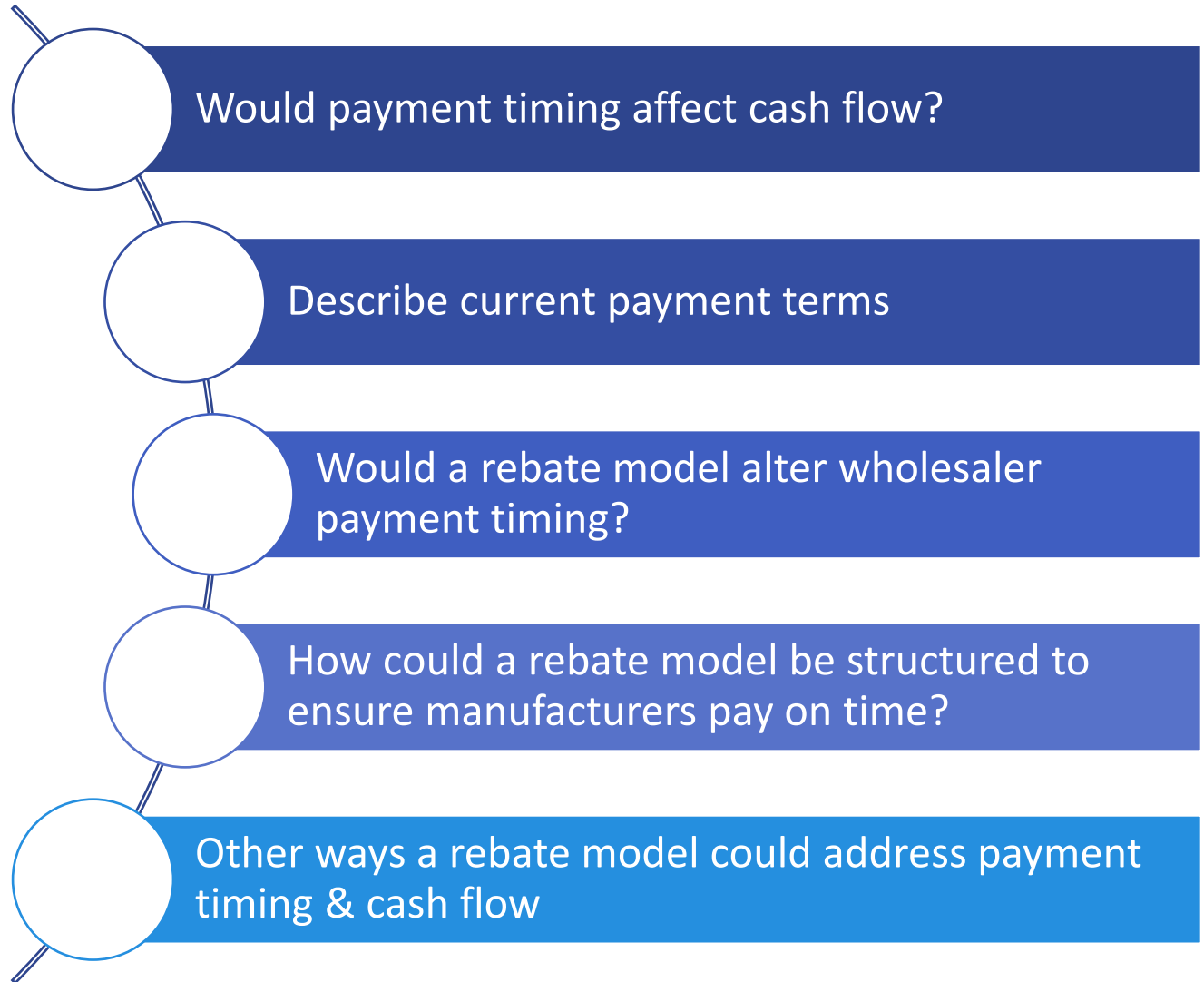


Increased FTE Requirement to Manage MFR Restrictions (# and/or \$)



Increased Vendor/Consultant Fees to Manage MFR Restrictions

RFI:
What Are the
Payment Timing &
Potential Cash
Flow Impacts for
Covered Entities



CE Data to Collect: Cash Flow Factors



DAYS' CASH ON HAND



WHOLESALE PAYMENT
TERMS



WHOLESALE CREDIT
LINE



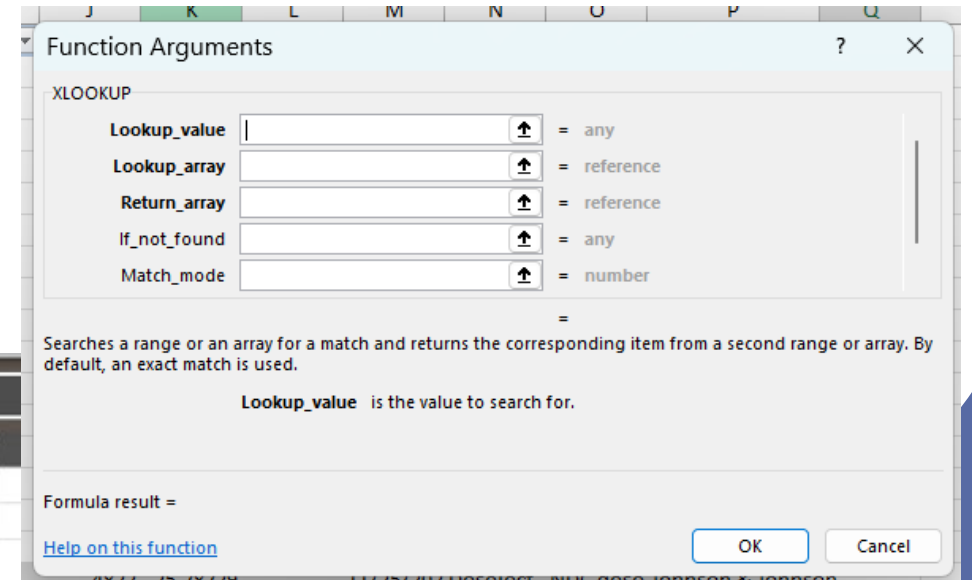
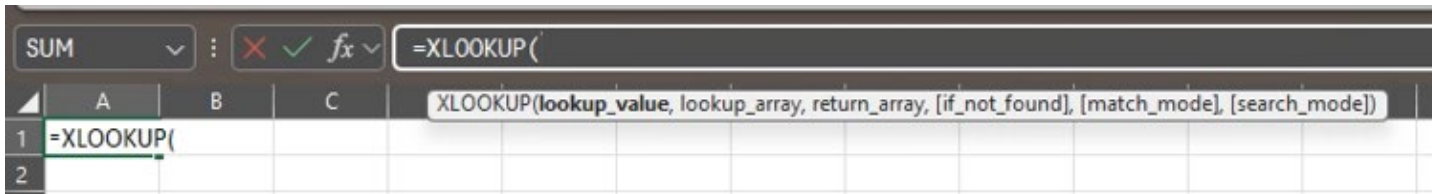
ESTIMATED IMPACT TO
UP-FRONT COGS



Calculating Impact on Cost of Goods


XLOOKUP Fields – All Fields Separated by Commas

- Lookup Value: NDC on the Rebate Tool
- Lookup Array: NDC Column from Pivot Table of PVP Historical Purchase Report
- Return Array: Sold Qty Column from Pivot Table of PVP Historical Purchase Report
- If Not Found: 0
- Match Mode: 0 (Exact Match)
- Search Mode: 1 (Search First-to-Last)



Simple XLOOKUP Step-By-Step

- **=XLOOKUP**(Select the Cell You Start With, Select the reference column with the data that matches your cell, Select the reference column with data that you want to return)
 - Type **=XLOOKUP** and an open bracket (
 - Select the cell you want to start with
 - Type a comma ,
 - Select the reference column with the data that matches your previously selected cell
 - Type a comma ,
 - Select the reference column with data that you want to return
 - Type a closed bracket)
 - Hit enter
 - If needed pull the cell down to apply the formula to all cells
- An easy way to select a column is by simply clicking on the letter in header



	A	B	C	D	E	F	G	H
1	IPAY	Selecte	Active	NDC-9	NDC-11	XREF N	HCPCS	MFP Effective Date
2	2026	IMBRUVIC	IBRUTINIB	57962-000	57962000712			01/01/2027
3	2027	LINZESS	LINACLOT	00456-120	00456120130			01/01/2027
4	2027	VRAYLAR	CARIPRAZ	61874-011	61874011511			01/01/2027
5	2026	ENBREL	ETANERCE	58406-001	58406001001			01/01/2027
6	2027	OTEZLA; C	APREMILA	55513-013	55513013728			01/01/2027
7	2027	XTANDI	ENZALUTA	00469-012	00469012599			01/01/2027
8	2026	FARXIGA	DAPAGLIF	00003-142	00003142711			01/01/2027
9	2027	CALQUEN	ACALABRI	00310-051	00310051260			01/01/2027
10	2027	VIGAYAN	DIFAXIMIN	55540-020	55540020103			01/01/2027

REMINDER!

HEALTH CENTER RECERTIFICATION

Recertification Ends March 2, 2026 (12MN EST)

6 Days To Complete

State	Health Centers	Sites
AK	1	1
AL	3	32
AR	1	9
AZ	1	12
CA	32	271
CO	1	5
DE	1	2
FL	4	51
GA	1	1
IA	2	9
ID	1	12
IL	7	51
IN	1	1
KS	2	6
KY	3	10

State	Health Centers	Sites
LA	7	94
MD	1	3
ME	2	2
MI	3	19
MN	2	2
MO	2	26
MS	2	15
MT	2	7
NC	4	12
NH	2	3
NJ	2	10
NM	2	14
NV	1	5
NY	10	140
OH	5	16

State	Health Centers	Sites
OK	2	6
OR	5	32
PA	4	28
PR	2	4
SC	4	22
TN	2	6
TX	6	20
VA	2	4
VI	1	4
VT	1	7
WI	2	5
WV	5	59
WY	2	7
Total	146	1045

Questions?

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