



NATIONAL ASSOCIATION OF
Community Health Centers®

December 2025 340B Office Hour

HRSA's 340B Rebate Model Pilot
(Part 2)

December 11, 2025



Welcome! Housekeeping

- Today's meeting is being recorded.
- The recording and additional resources will be made available to all registrants.
- A copy of the slides will be sent from regulatoryaffairs@nachc.org after the event.

Housekeeping

Please support **NACHC's commitment to creating a respectful and professional environment** for all webinar participants, including attendees, speakers, and moderators.

To promote a positive experience for everyone, we expect all participants to use the chat and Q&A functions in a respectful and professional manner. Harassment, discrimination, and disruptive or inappropriate behavior of any kind will not be tolerated. Failure to follow these guidelines may result in removal from the webinar at our discretion. **Thank you for your cooperation.**

Overview

340B State Toolkit - Sam Campbell, NACHC

Advocacy Update- Vacheria Keys, NACHC

Operations Overview- FQHC 340B Compliance

Q&A

***NEW*: NACHC State 340B Advocacy Toolkit**

- NACHC's [State 340B Advocacy Toolkit](#) is a guide for understanding and advocating for the 340B Drug Pricing Program at the state level.
- The toolkit summarizes 2025 legislative action on contract pharmacy access and provider reporting laws, provides talking points, and rebuttals for common industry arguments.





HRSA's 340B **Rebate Model**

AHA Lawsuit

The American Hospital Association (AHA) [filed a lawsuit](#) on Dec. 1, to block the Department of Health and Human Services (HHS) from launching its 340B rebate pilot on Jan. 1, 2026

Late Breaking News:

Pharmaceutical Research and Manufacturers of America (PhRMA), AbbVie, AstraZeneca, Boehringer Ingelheim (BI), and Novo Nordisk filed Dec. 10 motions asking the U.S. District Court for the District of Maine for permission to join the case as defendants.



NACHC Advocacy on 340B Rebate Model Pilot

Pilot Will Demonstrate Merits and Shortcomings of Rebate model

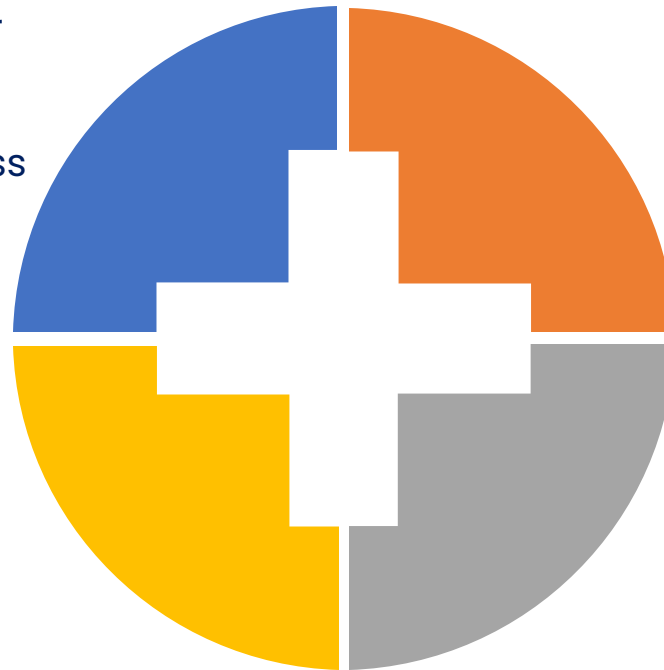
NACHC's Early Engagement

- Dr. Rhee wrote to both CMS Administrator Oz and HRSA Administrator Engels ahead of the rebate with concerns.
- Multiple letters through regulatory process that highlighted impact.

Current Action Alert

This week NACHC launched a three-pronged action alert enabling CHC advocates to request an exemption. Messages focus on impact to patients and organizations:

- Drug companies – 9 companies covering 10 drugs.
- HRSA – reiterating patient impact.
- Walgreens – requesting a reversal of decision to not process 340B claims for these drugs.



NACHC Recent Engagement

- NACHC has sent letters over the past couple of weeks to HRSA Administrator Tom Engels, all 9 drug companies, and Walgreens.
- Held Clinical FAST call for CHC leaders to share mitigation strategies that could include alternative prescriptions.
- Working with PCAs on a legislative solution.
- Met with the White House Office of Management and Budget on Monday.
- Developing toolkit and holding office hours.

Data Collection

NACHC is working with PCAs regarding uniform data collection that will collect information on the impact should the rebate model move forward.

340B Rebate Model Action Alert

The **340B Drug Pricing Program** is a vital lifeline for Community Health Centers (CHCs), enabling them to provide affordable, often free, life-saving and life-changing medications to low-income patients with chronic illness.

⚠️ That is now under threat. The Health Resources and Services Administration (HRSA) has proposed a **340B Rebate Model Pilot Program**, set to launch on **January 1, 2026**, fundamentally shifting how CHCs access 340B savings:

- **🚫 No more upfront discounts:** CHCs will be forced to pay the full, high Wholesale Acquisition Cost (WAC) for certain covered drugs.
- **⌚ Wait for a rebate:** CHCs must then submit extensive purchase and claims data and wait for the drug manufacturer to issue a rebate.

👉 Take Action Now! With the click of a button, you can [send letters to:](#)

- **Drug manufacturer CEOs and HRSA** – requesting to exempt CHCs from the 340B Rebate Model Pilot.
- **Walgreens** – urging them to continue processing 340B payment claims at contract pharmacies.

🗣️ Patient voices matter! Personal stories demonstrate the real-world value of the 340B program by showing how it enables patients to afford medications and access to care they might otherwise go without. If possible, customize your letters with a short patient story (2-3 sentences) before sending them.



Protect 340B Savings for Community Health Centers

HRSA's new 340B Rebate Model Pilot Program threatens affordable medications for millions of patients. 

Tell drug manufacturers:
Exempt CHCs from the 340B Rebate Model Pilot Program!

Follow the link to **take action now.**

 NATIONAL ASSOCIATION OF
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As of December 11:
of Advocates: 2,000+
Emails Sent: 28,000+

<https://bit.ly/ExemptCHCs340BRebateModel>

340B Rebate Data Strategy

The PCA Hub and NACHC are partnering to develop and execute a multifaceted data collection effort to bolster and coordinate their federal advocacy strategy aimed at ending the HRSA 340B Rebate Model Pilot.

01

Goal to capture the impacts of the rebate model pilot and deepen the collective understanding around how CHCs use 340B savings.

Pre-Pilot Impact Survey

2nd week of December

02

To monitor health center experiences during the rebate to gather practical impact data and support advocacy.

Pilot Impact Survey

Recurring: January - March

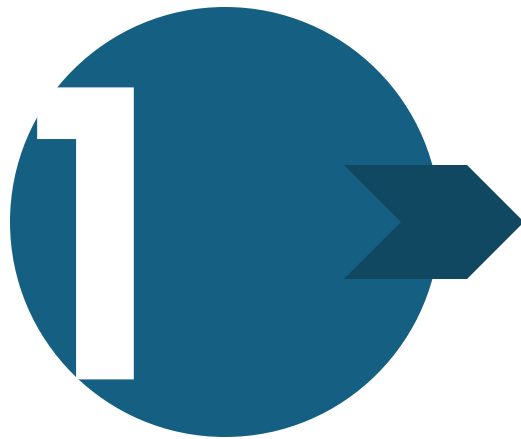
03

Develop state and national resources to support advocacy and highlight the value of the 340B program to patients.

National Summary & Report

Periodic

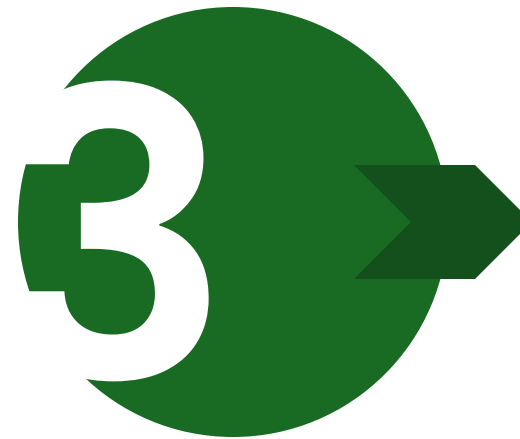
340B Rebate Data Strategy



Michigan PCA will facilitate the data collection on Survey Monkey.



Template communication resources will be available.



Every PCA will have access to your state's data.



NACHC will lead the development of summaries and infographics.

NACHC's 340B Rebate Webpage

Check out NACHC's 340B webpage that includes resources like:

- Rebate 101
- [Factsheet for Clinical Alternatives for Rebate Drugs](#) *(uploading to webpage soon)*
- FAQs for Beacon Platform
- And more!

The screenshot shows the NACHC website page for the 340B Rebate Model Pilot Program. The page features the NACHC logo at the top left, navigation links for CALENDAR, CONTACT US, LOGIN, and SEARCH at the top right, and a main navigation bar with links for About NACHC, Community Health Centers, State/Regional Affiliates & Networks, Resources, Training & Events, Policy & Advocacy, Newsroom, and Membership. The main content area is titled "340B REBATE MODEL PILOT PROGRAM" and includes a video player showing a panel discussion. Below the video, there is a breadcrumb trail: Home > Policy & Advocacy > Policy Priorities > 340B Drug Pricing Program > 340B Rebate Model Pilot Program. A call to action section titled "Register on the Beacon platform" encourages users to register before January 1, 2026. A detailed paragraph explains that starting January 1, 2026, all covered entities must pay the full price upfront for selected drugs, as the Beacon platform will be responsible for validating eligibility and issuing rebate payments.

<https://www.nachc.org/policy-advocacy/policy-priorities/340b-drug-pricing-program/340b-rebate-model-pilot-program/>

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About NACHC Community Health Centers State/Regional Affiliates & Networks Resources Training & Events Policy & Advocacy Newsroom Membership

340B REBATE MODEL PILOT PROGRAM

Home > Policy & Advocacy > Policy Priorities > 340B Drug Pricing Program > 340B Rebate Model Pilot Program

Register on the Beacon platform

Register at this [link](#) before January 1, 2026, to be ready for the pilot program in the new year.

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 manufacturers have chosen Beacon as their IT platform, which will be responsible for validating eligibility for 340B rebate claims and issuing rebate payments.

Potential Therapeutic Alternatives to Drugs included in 340B Rebate Pilot Program

2026	Med Class	Alternatives	Sliding Fee Alternatives
Eliquis	Anticoagulant	Pradaxa, dabigatran, Savaysa	Dabigatran
Xarelto	Anticoagulant	Pradaxa dabigatran, Savaysa, warfarin	Dabigatran, warfarin
Januvia	Diabetes – DPP4	Tradjenta, alogliptin, saxagliptin	Tradjenta, alogliptin, saxagliptin
Jardiance	Diabetes – SGLT2	Invokana, Steglatro	N/A
Farxiga	Diabetes – SGLT2	Invokana, Steglatro	N/A
Fiasp/Novolog	Diabetes – Rapid acting insulin	Humalog, Admelog, Lyumjev, Apidra, Insulin Lispro	Humalog, Insulin Lispro

Brand	Generic
Pradaxa	Dabigatran
Humalog	Insulin Lispro
Lyumjev	Insulin Lispro-aabc

NACHC 340B-Related Webinars

[Register here](#) to attend the upcoming 340B Office Hours
[Register here](#) for January 21 additional office hour.



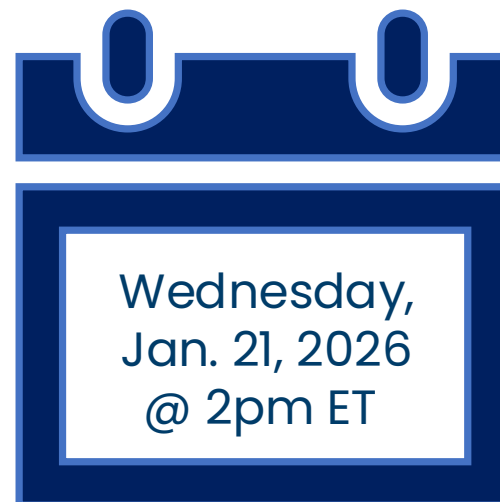
Focus topic: Rebate Model Part 1

[Slides](#) & [Recording](#)



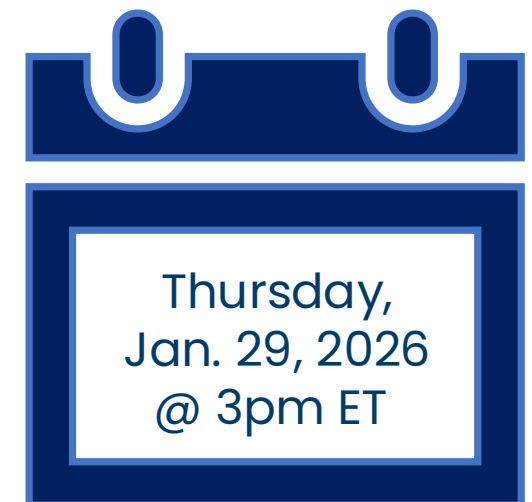
Focus topic: Rebate Model Part 2

Slides and Recording will be sent out after this call!



Focus topic: Rebate Model Part 3

***Additional Office Hour!**



Focus topics: TBD

NACHC Office Hours December 2025

Rebate Pilot



340B Rebate Pilot Approved 9 Manufacturers

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
Novartis	Entresto*	Heart Failure
Janssen Biotech, Inc. (J&J)	Stelara	Psoriasis, Crohn's, & Ulcerative Colitis
Janssen Pharmaceuticals, Inc. (J&J)	Xarelto	Anticoagulation

All Manufacturers have elected to use the Beacon platform

340Blue

340B Rebate Model

[→ LEARN MORE](#)

Enables the submission, validation and payment of 340B rebates to 340B covered entities. Users can monitor rebate status, perform reconciliations and access auditable records.

Beacon's customer support team provides dedicated technical assistance and resolves inquiries.

MFPurple

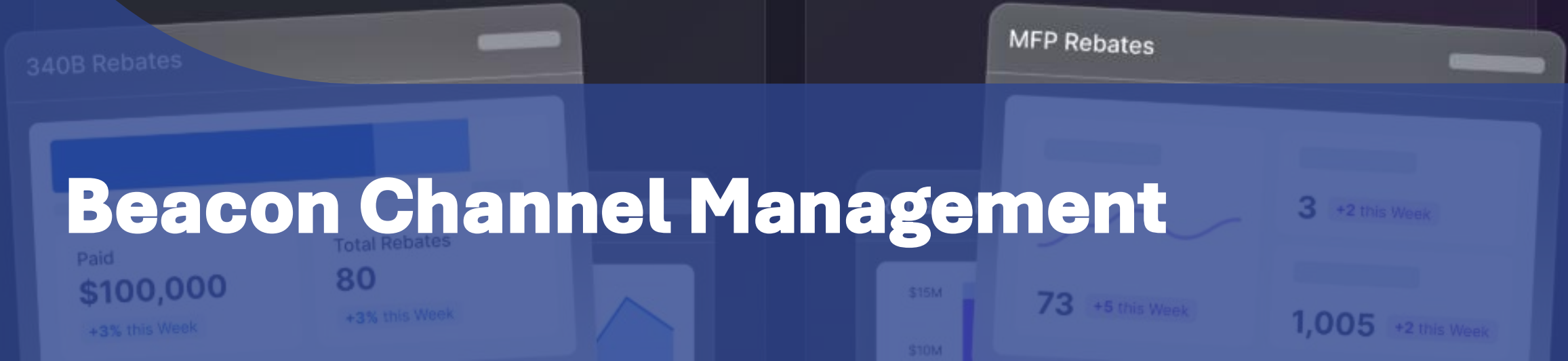
Maximum Fair Price (MFP) Rebate Solution

[→ LEARN MORE](#)

Enables dispensing entities to easily research MFP rebate validation and payment status, reference the basis of pricing and reconcile MFP rebate payments against account receivables.

Our customer support team is ready to help, including through an interactive good faith resolution center.

Beacon Channel Management



Beacon 340B

Manufacturer commissioned platform which enables the submission, validation and payment of **340B rebates** to **340B covered entities**.

Service/Feature	Description
340B Rebate Pilot Program	Enables 340B entities to register and submit rebate claims to access the 340B Ceiling Price.
Claim Deduplication	Supports processes for certifying 340B status and deduplicating claims, including checking claim status directly in Beacon.
Dispute Resolution	Permits CEs to submit good faith inquiries about 340B claims, such as disputes over 340B status, rejected claims, or payment amounts.
Resources	Provides access to overviews of manufacturer processes, webinars, & FAQs.
Customer Support	Available by email, phone, and live chat support. Most inquiries are handled by Beacon staff; complex cases may be escalated to the manufacturer.

340B Rebate Model

[→ LEARN MORE](#)

Enables the submission, validation and payment of 340B rebates to 340B covered entities. Users can monitor rebate status, perform reconciliations and access auditable records.

Beacon's customer support team provides dedicated technical assistance and resolves inquiries.



What do I need to register for Beacon 340B?

All associated site 340B IDs

- It is easiest to register them all at once initially
- The search bar may not populate every single site if you search part of your 340B ID, but often the specific site will come up if you type in the exact 340B ID
 - If a site still does not appear for registration, contact Beacon support

Organizational documentation

- EIN and EIN documentation
 - Any formal documentation of EIN is typically accepted
- Articles of incorporation
- Most recent W-9
- **Documents need to be uploaded for every site, even though the information is the same for every site**
 - Yes, it is tedious. There is no way around it.

Beacon 340B registration continued... Once 340B ID has gone through initial approval

Banking information

- Bank account and routing number
- Bank letter from the last 6 months
- ****Again, this information needs to be added to each individual 340B ID****
 - Again, yes this is a pain and no, there is no way around it

Penny test

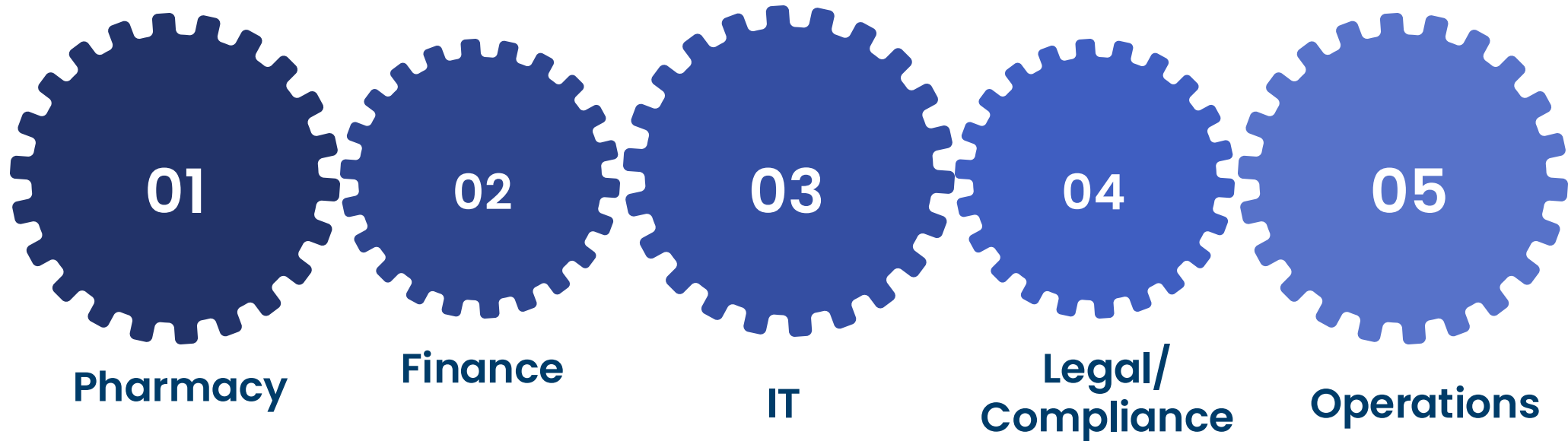
- One penny test will be performed (as opposed to one for every 340B ID) to ensure the banking information is set up to properly pay the entity via ACH

User additions

- Invite new users
 - User role can manually upload claims data and view rebate status
 - Administrator role can do everything the user role can + add other users and edit banking information
- Invite new partner
 - Requires an access token provided to you by the TPA or other vendor partner
 - Read permissions allow the partner to view the data, such as rebate status
 - Read/Write permissions allow the partner to upload claims and view data
- ****Yet again, this information needs to be added to each individual 340B ID****
 - **And again, yes, we know it is a pain but there is no way around it**

Establish your 340B Rebate Team

Health Centers should create a designated multi-disciplinary team to oversee the operationalization of the 340B Rebate. It's important that all the responsibility is shared across the health center's leadership team to ensure compliance and financial security.



Should we stock up on these drugs now?

- No!
 - If you buy up products at a 340B price now to avoid having to deal with the rebate model, you will likely receive a Good Faith Inquiry from a manufacturer.
 - While you are statutorily within your rights to purchase 340B-priced drugs for eligible patients, the manufacturers do not agree with this practice and may seek repayment for over-purchases.
 - You would have recourse to report to OPA that the manufacturer was denying you the 340B price by insisting upon repayment, but the manufacturer could restrict access to their other drug products in the interim on the basis that they do not believe you are abiding by their policy.
- Bottom line – You are within your rights, statutorily, to stock up, but unless you are willing to go through the hassle and stress of a manufacturer audit and potentially lose access to pricing for the manufacturer’s other drug products, it is easier to just operate within the rebate pilot.



Does the rebate pilot apply only to contract pharmacy or Medicare claims?

- No!
 - While the included drugs are those negotiated with Medicare for Maximum Fair Pricing, the rebate pilot applies to all payers (or lack of, in the case of cash-paying patients) and all areas of use (contract pharmacy, entity-owned pharmacy, dispensaries, clinic administrations).
- Bottom line – Anywhere you purchase these drugs at a 340B price today will be included in the rebate pilot.



How will we manage Medicaid billing requirements when paying WAC price?

- OPA's Response:
 - While the upfront purchase will occur at WAC, the cost of a 340B eligible purchase is expected to be the 340B ceiling price, once the rebate is paid. Participating manufacturers have committed to supplying a 340B ceiling price file for the covered outpatient drugs under the rebate model pilot. This file will be available for download on the rebate model's IT platform. The file may be used to feed pharmacy billing systems to assist with Medicaid billing at acquisition cost. The 340B OPAIS pricing component is also available for verification of the accuracy of the manufacturer provided files.
 - Covered entities should work with state Medicaid agencies to determine best practices for billing.

Billing Requirements By State... So Far

- We have reached out to all state Medicaid programs to ask which price entities should use to bill Medicaid for these drugs under the rebate program.

State	Managed By	Price to Bill for Rebate Drugs	Notes
Alabama		340B Ceiling Price	
Maine	Maine DHHS	U&C	Maine prohibits carving in at retail pharmacy (even entity-owned)
Michigan	MDHHS/Health Services/Pharmacy Mgt Div	340B Ceiling Price	MICHIGAN 25-68-Pharmacy-Final.pdf
New Jersey	State of NJ DHS (DMAHS)	AAC	NJ 27-04.pdf 340B.pdf
New York	Magellan Health	340B CEILING PRICE	mu_no10_oct25_pr.pdf
North Dakota	Dept of Human Services	340B Ceiling Price + SCC 20	pharmacy-provider-manual.pdf https://www.hhs.nd.gov/healthcare/medicaid/provider/pharmacy
Oklahoma	Oklahoma Health Care Authority	U&C OR WAC	https://oklahoma.gov/ohca/providers/types/pharmacy/340b-drug-discount-program.html
Oregon	Gainwell Technologies	AAC	For Oregon's FFS program, covered entities must bill the ultimate discounted 340B price after rebate on pharmacy and professional claims.
Pennsylvania		340B Ceiling Price	
Tennessee	State of TN- Tenn Care	SEE NOTE	They recommend that you refrain from submitting claims for drugs acquired through the rebate model.
Washington		340B Ceiling Price	
West Virginia	WV DOHS Bureau For Medical Services	AAC + modifier (UD, TB, JG) or NCPDP values (08 or 20)	
Wyoming	Optum Rx	340B CEILING PRICE	Basis of Cost = 8 and Submission Clarification Code = 20

The 340B Ceiling Price is available as an exportable report when logged into Beacon 340B

How are TPA partners handling the transition to a rebate model?

340B Direct

- Accepting requests to block and subsequently unblock rebate model drugs from accumulating to prevent costly true-ups
- Will request NDC list for impacted drugs, which can be downloaded from Beacon Channel Management website (<https://cm.beaconchannelmanagement.com/pages/resources>)

Aventi

- Will stop carving in claims for rebate model drugs 12/23/25 to allow sufficient time for replenishment before 1/1/26 to prevent costly true-ups
- Final day to replenish accumulations is 12/30/25 and any unspent accumulations after that date will not carry forward
- Entities must notify Aventi that they plan to opt-in to maintain the rebate model drugs in their programs starting 1/1/26

CaptureRx

- Working on a manual solution for pay on dispense models – stay tuned

How are TPA partners handling the transition to a rebate model?

Equiscript

- Accepting requests to place a ticket to block and subsequently unblock rebate model drugs from accumulating to prevent costly true-ups

MacroHelix

- Users can manually exclude and re-include rebate drugs from 340 eligibility in 340B Architect under 340B Restoration & Rebate, with Bulk Exclusions
- All customers must submit any new test files to Macro Helix by end of day, 12/12/25 to guarantee review before 1/1/26
 - Files received after this date will be processed in ticket order, which may delay evaluation beyond 1/1/26

How are TPA partners handling the transition to a rebate model?

Nuvm

- Will pause qualification of rebate model drugs 12/15/25 to allow sufficient time for replenishment before 1/1/26 to reduce costly true-ups
- Final day to replenish accumulations is 12/29/25 and any unspent accumulations will be zeroed-out and any necessary true-ups will be processed
- Will provide a cash claim “refill-due patient list” to help identify and process patient refills due before 1/1/26 so the entity can reach out and encourage the patient to pick up their medication before 12/28/25
 - Entities utilizing a cash claim program will need to communicate with Nuvm regarding desired pricing model moving forward
- Qualification for these drugs will resume 1/1/26 with a clean slate for accumulations to replenish at WAC

PharmaForce

- Accepting requests to place a ticket to block and subsequently unblock rebate model drugs from accumulating to prevent costly true-ups

Pillr

- Accepting requests to block and subsequently unblock rebate model drugs from accumulating to prevent costly true-ups
- Will request NDC list for impacted drugs, which can be downloaded from beacon channel management website (<https://cm.beaconchannelmanagement.com/pages/resources>)

How are TPAs handling the transition to a rebate model?

Walgreens

- Will exclude rebate model drugs from the program (including uninsured plans) beginning 1/1/26, with plans to re-include claims from all payers except Medicare when system infrastructure allows in the future
- Will stop carving in claims for rebate model drugs 12/23/25 to allow sufficient time for replenishment before 1/1/26 to prevent costly true-ups

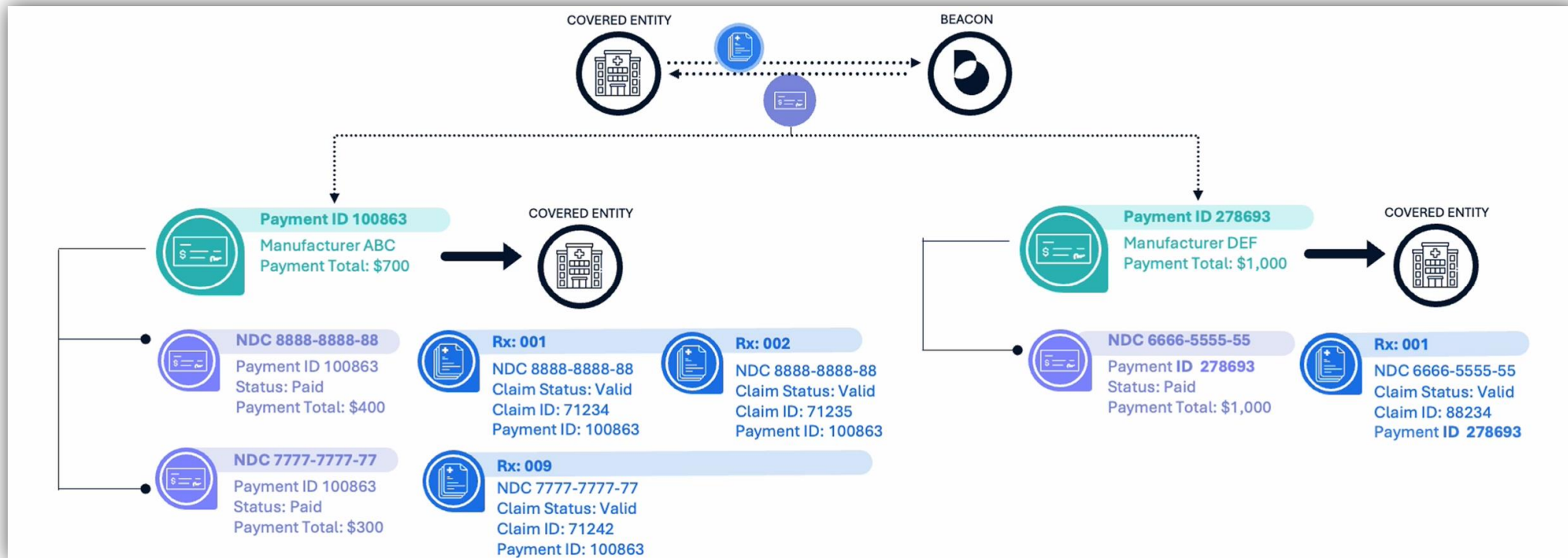
Wellpartner

- Will stop carving in and ordering rebate model claims starting 12/29/25
- J&J drugs (Stelara & Xarelto): Starting 1/1/26, will only allow claims dispensed on or after 11/14/25 to carve in and replenish at WAC
- All other rebate drugs: Will reverse outstanding unreplenished claims on 1/2/26 to prevent costly true-ups, then start accumulations for these drugs at 0 and only include claims dispensed on or after 1/1/26 moving forward
- There will be a no order delay in place for all impacted NDCs, which should alleviate differences/challenges for pay on dispense models

How will we reconcile 340B rebates with submitted claims?

****Beacon 340B upload receipt file will contain RX ID to Claim ID crosswalk information****

Payment IDs can be used to link payments, rebates, and claims



Questions?

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Additional Frequently Asked Questions

What adjustments do I need to make to my pharmacy software to have the appropriate information at POS?

What is the process to report a rebate-related issue?

What information should we keep for my auditable records for OPA?

The background features a dark blue area on the left and a white area on the right, separated by a diagonal line. The line is a lighter shade of blue. The text 'Key Takeaways' is centered in the white area.

Key Takeaways

Thank You For Joining
December's 340B
Office Hours

Questions?

Email:
regulatoryaffairs@nachc.org

