



340B: Continued Developments

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340BTogether Managing Members

IRA drugs in affect 2026

Manufacturer	Brand
Abbive	Imbruvica
Amgen	Enbrel
Astrazeneca	Farxiga
Boehringer Ingelheim	Jardiance
Bristol Myers Squibb	Eliquis
Johnson & Johnson	Xarelto
Johnson & Johnson	Stelara
Merck	Januvia
Novartis	Entresto
Novo Nordisk	Novolog/Fiasp

Hospital 1:

Percentage change in profit per IRA claim decreased 61.2%.

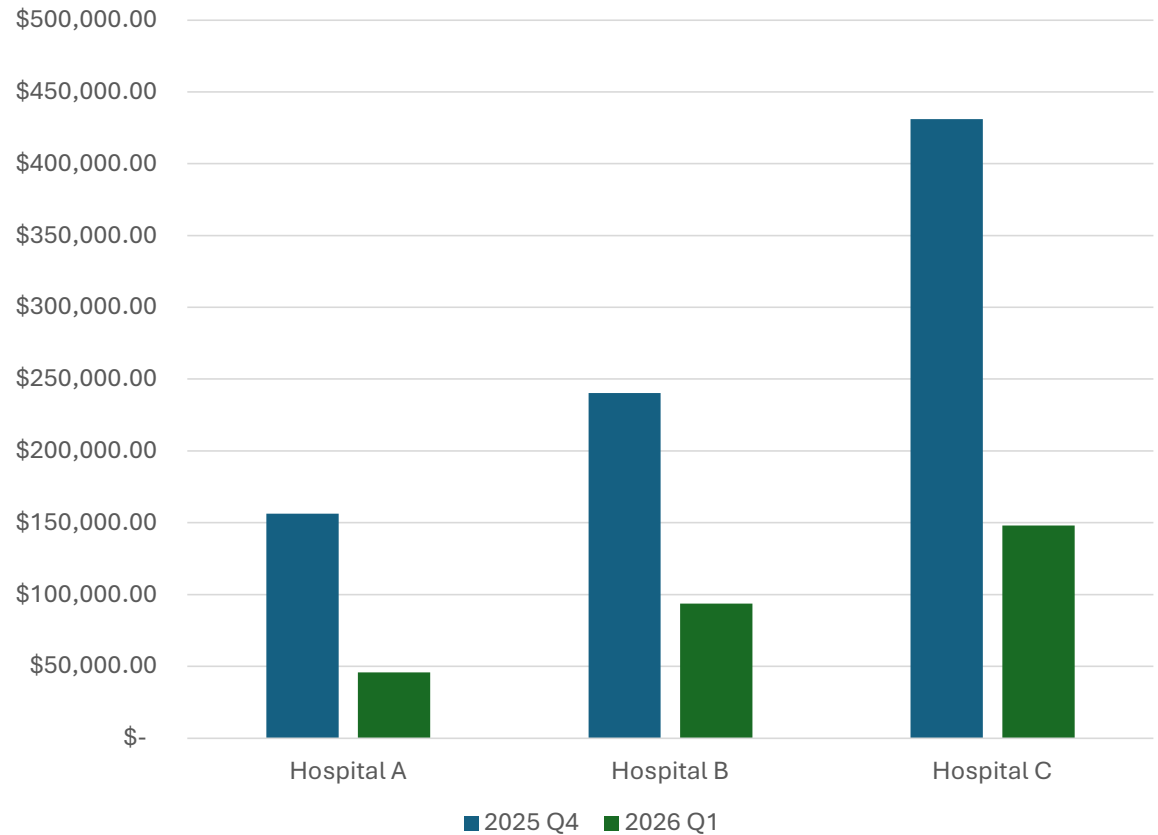
Hospital 2:

The profit generated in Q4 was based on 296 claims compared to 244 claims in Q1.

Hospital 3:

Claim volume only decreased 13% in Q1 but had a 65% profit drop.

2025-2026 IRA Drug Profit Loss



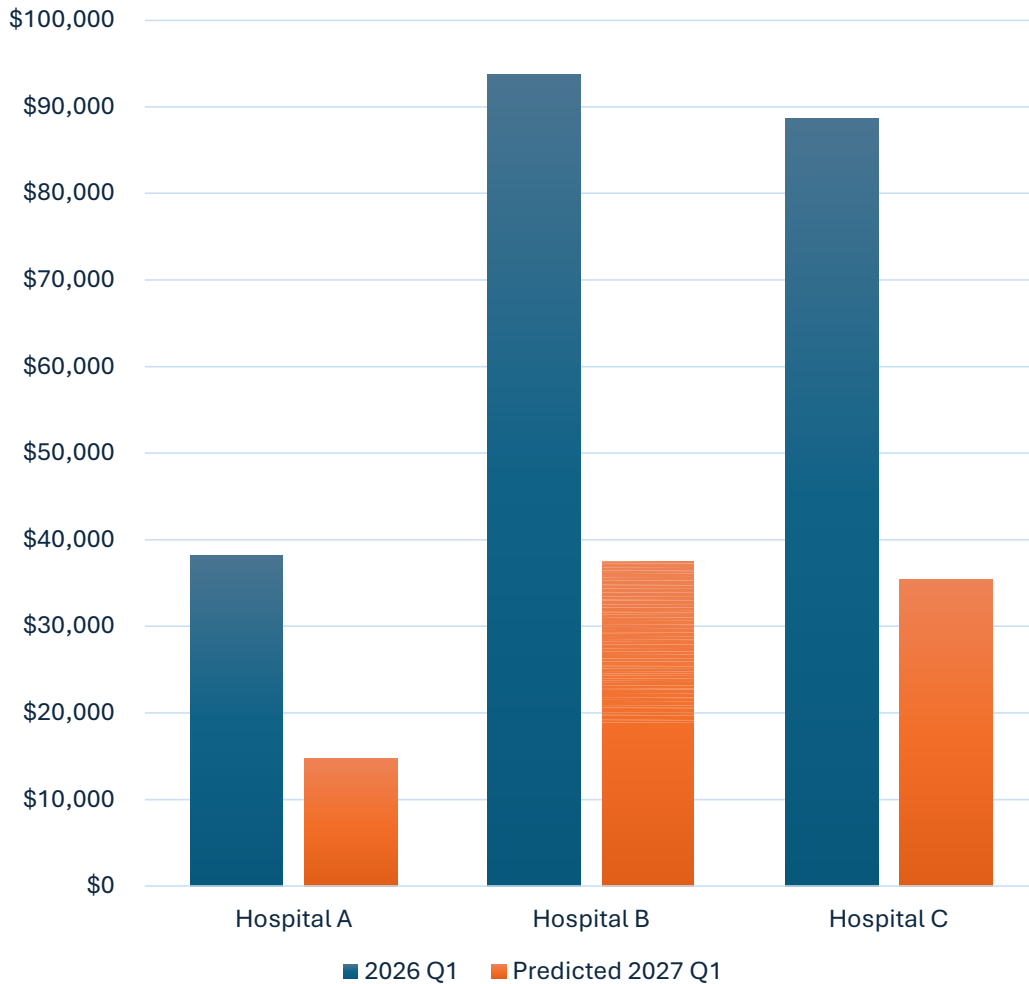
Walmart and Walgreens has decided at this time to not participate IRA drug 340B Purchases.

This resulted in one Entity netting \$75,074.23 in Q4 of 2025 to ZERO dollars in Q1 of 2026 at a particular Walgreens location on IRA impacted drugs.

IRA Drugs in affect 2027

Manufacturer	Brand
Novo Nordisk	Ozempic
Glaxosmithkline	Trelegy Ellipta
Astellas	Xtandi
Bristol-Myers Squibb	Pomalyst
Boehringer Ingelheim	Ofev
Pfizer	Ibrance
Abbvie	Linzess
Astrazeneca	Calquence
Teva	Austedo
Glaxosmithkline	Breo Ellipta
Salix	Xifaxan
Abbvie	Vraylar
Boehringer Ingelheim	Tradjenta
Merck	Janumet
Amgen	Otezla

2027 IRA Drug Predicted Profit Loss



If profit were to drop another 60% over the year, each entity's profit loss would be roughly as follows:

Hospital 1:

2026 Q1- \$38,233

2027 Q1- \$14,755

Hospital 2:

2026 Q1- \$93,670

2027 Q1- \$37,468

Hospital 3:

2026 Q1- \$88,563

2027 Q1- \$35,425

RFK Jr. Speaks on 340B Program

Kennedy “there’s all kinds of problems with the program,” as well as “all kinds of benefits.”

He pointed to examples of what he called “really horrible abuse” by some 340B hospitals, but stressed Congress needs to address the issue.

“It’s a mess, and it’s in litigation—and the pharmaceutical companies are suing,” he said. “The only thing that can fix it is Congress,” he said.





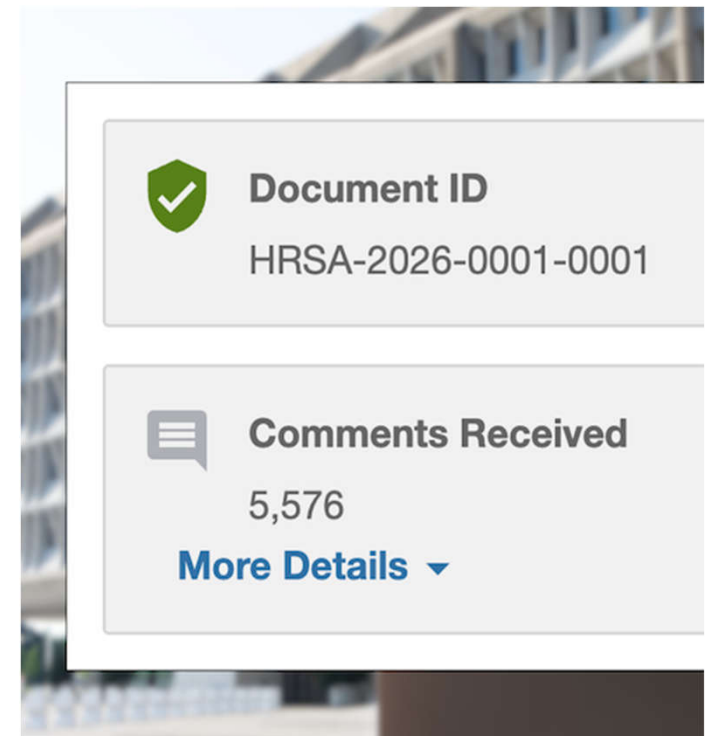
Bipartisan-Backed Bill Introduced

(Safety-Net Provider Drug Pricing
Protection Act 2.0)

- An expected bipartisan-backed U.S. House bill would exempt a range of covered entities from 340B rebates.
- The Bill would exempt certain covered entities from paying more than the 340B ceiling price-
 - federally qualified health centers (FQHCs)
 - critical access hospitals
 - sole community hospitals
- It is not expected to include rural referral centers, disproportionate share hospitals (DSH) or free-standing children's hospitals.

HRSA Receives More than 5,500 Comments on 340B Rebate RFI

- 340B Report reported that a drugmaker-funded patient group submitted around 1,001 duplicate comments supporting 340B rebates earlier in the submission process.
- Patients Rising is a 501(c)(4) nonprofit that is not required to list its donors. The group lists 15 pharmaceutical companies as corporate sponsors such as-
 - AbbVie, AstraZeneca, Eli Lilly and Johnson & Johnson—as well as the brand-name drug industry’s largest trade group, the Pharmaceutical Research and Manufacturers of America (PhRMA).
- Most comments continued to argue that a 340B rebate model would create a significant administrative burden and harm their ability to serve vulnerable patients.



Hospital Group Asks HRSA to Address Drugmakers' 340B In-House Pharmacy Claims Data Requirements

- A key hospital trade group again urged HRSA to address “unlawful” drugmaker policies that require 340B covered entities to report 340B claims data for in-house pharmacy utilization
- Lilly, Novo Nordisk, AstraZeneca, Bristol Myers Squibb (BMS) and Exelixis have announced the requirements for in house pharmacy 340B claims data submissions.
- 340B hospitals and other covered entities reported receiving warning letters from Lilly that threatened “the imminent loss of discounted pricing for Eli Lilly drugs unless hospitals comply with Lilly’s data-submission requirements ‘without further delay.’”



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April 27, 2026

The Honorable Thomas J. Engels
Administrator
Health Resources and Services Administration
U.S. Department Health and Human Services
5600 Fishers Lane
Rockville, MD 20852

Re: Request for HRSA Action on Drug Company 340B Data Policies

Dear Administrator Engels:

On behalf of our more than 2,000 member hospitals and health systems that participate in the 340B Drug Pricing Program, the American Hospital Association (AHA) writes to alert you to the latest development in connection with the growing number of drug company policies requiring covered entities to submit onerous amounts of claims data in exchange for their statutorily owed 340B discounts.



Contract Pharmacy Access Law ruled against by Federal Appeals Court

The 4th Circuit's divided March 31 decision on West Virginia's law marked the first time that a federal appeals court ruled against a state contract pharmacy law, after three-judge panels for the U.S. 5th and 8th Circuit Courts of Appeals unanimously upheld similar statutes in Arkansas, Louisiana and Mississippi.

More development in the 340B Space

New Claim Submission Platform, Truzo, becomes platform of choice for four manufacturers, Organon, Alkermes, Gilead, and Puma Biotechnology

Novo Nordisk, Eli Lilly, AstraZeneca, Exelixis and BMS now demanding claim submission for In-House pharmacy claims requiring more reporting and resources from entities

Rebate Model looming as PHRMA continues to push for upending the 340B program's up-front discount precedent



340B TOGETHER

HELPING YOU HELP OTHERS

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