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"You are never wrong, if you do the right thing."



Navigating The Next Era of 340B: Beacon and Rebate Pilot

11/19/2025

Overview of Today's Discussion



- ✓ Background / Timeline
- ✓ 340B Rebate Pilot Approved Drugs
- ✓ The Basics
 - Prerequisites
 - Defining Eligibility
 - Data Submission
- ✓ 2025 Preparation
 - Unreplenished Accumulations
 - TPA Inquiries
- ✓ Details That Make a Difference
- ✓ Questions

Background: How Did We Get Here?

August 16, 2022:
IRA signed into law
establishing CMS'
authority to negotiate
drug pricing and set
MFPs for certain high-
cost drugs under
Medicare Part D
(starting 2026) and
Medicare Part B
(starting 2028)

Q4, 2024:
Manufacturers
propose rebate
model roll out;
HRSA responds
threatening
manufacturers'
PPA

July 31, 2025:
HRSA announces
application
process for
manufacturers to
implement 340B
Rebate Model
Pilot

January 1, 2026:
340B Rebate
Model Pilot
live on Beacon

August 29, 2023:
CMS announces
Maximum Fair
Price Drugs, giving
manufacturers
leverage to use the
rebate model in
negotiation

May 15, 2025:
US District Court
upholds HHS
enforcement that
pre-approval is
required for rebate
model – opening
the door for
PhRMA lobbying

October 30, 2025:
HRSA
announces
approval of
340B Rebate
Model for 8
manufacturers

340B Rebate Pilot Approved Drugs



Manufacturer	Selected Drug
Bristol Myers Squibb	Eliquis
Immunex Corporation (Amgen)	Enbrel
Astra Zeneca AB	Farxiga
Pharmacyclics (Abbvie)	Imbruvica
Merck Sharp Dohme	Januvia
Boehringer Ingelheim	Jardiance
Novo Nordisk Inc.	Novolog; Fiasp
Janssen Biotech, Inc. (J&J)	Stelara
Janssen Pharmaceuticals, Inc. (J&J)	Xarelto
<i>*Novartis</i>	<i>*Entresto</i>

**Entresto has been approved by HRSA effective April, 1, 2026*

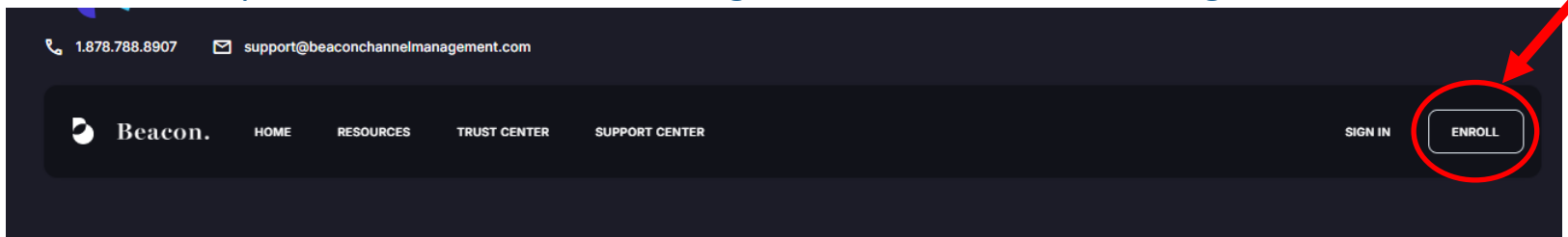
The Basics: Prerequisites

- Standard 340B Pricing will **no longer** be available for the 10 drugs approved for the pilot program.
- **Any** pharmacy that utilizes 340B will only be able to obtain 340B savings through a rebate mechanism.
(Contract Pharmacy, In-House, Mixed Use, Closed Door, Etc.)
- Register for Beacon **ASAP** – Gather all required items prior to enrolling!
- 340B ESP will **no longer** accept claims submissions for the 10 drugs approved for the pilot program.

Items Required for Beacon Registration:

- ✓ Employer Identification Number (EIN)
- ✓ CP-575 Letter (IRS letter stating the EIN)
- ✓ Articles of Incorporation
- ✓ W-9 (Most Recent Version Provided by IRS)
- ✓ Bank Account Information (Where Rebates Should be Paid)

<https://cm.beaconchannelmanagement.com/enrollments/registrations>





Beacon.

HOME

RESOURCES

TRUST CENTER

SUPPORT CENTER

SIGN IN

ENROLL

Beacon: Illuminating Pharmaceutical Pricing

Getting Started with Beacon Rebate Model

Begin the registration process by providing basic contact information and selecting one or multiple covered entities you are authorized to register. Following verification of your contact details, you will be required to provide documentation to establish your authorization to register. Documentation will be reviewed by Beacon Support and you will be notified of any additional information necessary to complete your registration.

Please Note

You should be prepared to provide the following documentation to complete the registration:

- Employer Identification Number (EIN)
- CP-575 Letter (IRS letter stating the EIN)
- Articles of Incorporation
- W-9 (Most Recent Revision Provided by IRS)

If you do not have these documents ready, you can revisit the registration process by navigating to the Continue Registration page and entering your Enrollment ID.

Steps to Enroll

- 1 **Contact Details**
Provide your contact details
- 2 **Select Covered Entity(s)**
Select your Covered Entity(s) to register
- 3 **Signature Authorization**
Confirm authorization
- 4 **Terms & Privacy**
Review and accept terms

Questions?

Click the icon in the lower right to chat live with Beacon Support.

Prefer to email?

support@beaconchannelmanagement.com

NEW REGISTRATION

CONTINUE REGISTRATION

Contact Details

First Name

John

Last Name

Doe

Email

Work Email Address

Please provide the email address associated with your covered entity(s).

Confirm Email

Confirm Email Address

Select Covered Entity(s)

Select Your Covered Entity(s)

Search by 340B ID or entity name

no entities have been selected

Authorized Signatory

By checking the box below you confirm your authorization to register an account with Beacon for the covered entity(s) selected above.

☐ I am authorized

Terms & Privacy

By checking the box below you confirm your understanding of and agree to the [Terms of Use](#) and [Privacy Policy](#).

☐ Accept Terms & Privacy Policy

ENROLL

Items Required for Beacon Registration:

- ✓ Employer Identification Number (EIN)
- ✓ CP-575 Letter (IRS letter stating the EIN)
- ✓ Articles of Incorporation
- ✓ W-9 (Most Recent Version Provided by IRS)
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The Basics: Defining Eligibility

Differing Eligibilities

1. Hospital type ID with in-house
2. Hospital type ID without in-house
3. Grantee type ID with in-house
4. Grantee type ID without in-house
5. Any Entity type located in state with legislation passed

1 3

In-House
Pharmacy Eligible
Only (No Contract
Pharmacies)

2 4

Eligible to Select
One Contract
Pharmacy for
Designation (Must
Complete on ESP)

3 4

Grantee Type Entities:
Unlimited Contract
Pharmacies for
Certain
Manufacturers

5

State Legislation
Exemptions:
Check
Manufacturers for
your State

The Basics: Defining Eligibility (cont.)

Covered Entities

View shipping locations, eligible contract pharmacies, manage users, and view bank details

INVITE NEW PARTNER INVITE NEW USER

340B ID	ENTITY TYPE CH	PRIMARY CONTACT	AUTHORIZING OFFICIAL
BEACON REGISTRATION 2025-11-11	BANK STATUS MISSING	ADMINISTRATORS 4	USERS 4

CE SHIPPING LOCATIONS ELIGIBLE CONTRACT PHARMACIES USERS PARTNERS

PHARMACY	NPIs	MANUFACTURER
OK 73728		Amgen AstraZeneca Boehringer Ingelheim Bristol Myers Squibb Merck Novo Nordisk AbbVie
OK 73717		Amgen Boehringer Ingelheim Merck AbbVie
OK 73703		Amgen Boehringer Ingelheim Merck AbbVie
OK 73703		Amgen Boehringer Ingelheim Merck AbbVie
OK 73724		Amgen Boehringer Ingelheim Merck AbbVie
OK 74136		Amgen Boehringer Ingelheim Merck

PREV 1 - 20 of 73 results NEXT

The Basics: Data Submission

January 1, 2026:
Dispense and order
for replenishment
at WAC pricing on
**340B wholesale
account.**

Submit claim data
to Beacon **within
45 days of
dispense.**

Beacon will remit
payment **within 10
calendar days** of data
submission. Rebate
denials will also be
communicated within
the same time frame.

340B Rebate Calculation:

$$\text{Rebate} = \text{WAC paid up front} - \text{340 Ceiling Price on DOS}$$

**340B Ceiling Price file will be posted on Beacon for
every rebate eligible NDC**

The Basics: Data Submission (cont.)

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 Provider 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)

The screenshot displays the 'Pharmacy Claims' submission interface. On the left, a sidebar contains a 'Claims' menu with options: 'Claims Data', 'Medical Submissions', 'Pharmacy Submissions', 'Medical Report', and 'Pharmacy Report'. The main area has tabs for 'SUBMISSION', 'ORIGINAL FILE', and 'COLUMN MAPPINGS'. The 'SUBMISSION' tab is active, showing a submission form. On the right, a panel displays submission details: '13 Nov', 'Submission Name: Pharmacy_11-13-25', 'Files: 0', and 'Selected Rows: 0/0'. There is a 'SAVE AND SUBMIT' button and an 'ATTACH' button labeled 'Attach File(s) to Submit'.

- “Pharmacy Claims Data” = Retail Pharmacy submission
- “Medical Claims Data” = Provider Administered submission
- Beacon security protocols for handling data can be found within Beacon Trust Center

2025 Preparation: TPA & Internal Discussion Points

Inquire with your TPA(s):

- ② Data submission feed capabilities with Beacon.
 - ① *If TPA can submit data on your behalf, you must make the TPA an **authorized partner** within Beacon!*
- ② Will pharmacies ineligible for rebate block the NDCs?
- ② How will profitability be calculated under winner's only model configurations?
- ② How will unreplenished accumulation be handled just prior to 2026?

The screenshot displays the Beacon registration interface. At the top, there is a header bar with a logo and a search bar. Below this, the interface is divided into several sections. On the left, there is a sidebar with navigation links: '340B ID', 'BEACON REGISTRATION 2025-11-11', 'CE SHIPPING LOCATIONS', 'ELIGIBLE CONTRACT PHARMACIES', 'USERS', and 'PARTNERS'. The 'PARTNERS' link is highlighted with a red circle and a red arrow. The main content area shows registration details in a table-like format:

340B ID	ENTITY TYPE CAH	PRIMARY CONTACT	AUTHORIZING OFFICIAL
BEACON REGISTRATION 2025-11-11	BANK STATUS IN_REVIEW	ADMINISTRATORS 2	USERS 3

At the bottom, there is a table with columns: NAME, KIND, ACCESS TOKEN, PERMISSION, and REVOKE.

Internal Discussion Points:

- ② How are we handling data submission for in-house pharmacies, employee pharmacies, and/or mixed-use?
 - ① *Note: if you do not have a TPA administering these, or if your TPA does not have a feed with Beacon, **YOU** are responsible for the associated data submission!*
- ② How are we handling cash card / uninsured programs?
- ② Are we prepared for impacts to cash flow while waiting on rebate payments?

2025 Preparation: Unreplenished Accumulation

Manufacturers have issued differing guidelines regarding their willingness to collaborate with CEs on unreplenished accumulation.

**BEST PRACTICE: Resolve
ALL Unreplenished
Accumulation during the
final days of December!**

JHCS recognizes that some CEs may not be able to replenish the accumulations of J&J Selected Drugs prior to the effective date. According to the 340B program, a discretionary 45-day period is provided for the replenishment of Selected Drugs with dates of replenishment prior to the effective date. A Covered Entity was not able to replenish the accumulations of J&J Selected Drugs prior to the effective date. The requirements of the 340B program are not applicable to the Covered Entity representing pricing prior to January 1, 2025. The Covered Entity will monitor Covered Entity accumulations of J&J Selected Drugs prior to the effective date.

Johnson
Johnson



Finally, after January 1, 2025, Merck will provide a one-time accommodation permitting covered entities to submit rebate requests for unreplenished accumulated units of JANUVIA dispensed during the fourth quarter of 2025, limited to one package size, NDC-11.³ Rebates under this accommodation will be calculated based on the 340B and 340B ceiling price in effect during that period. By requesting rebates under this accommodation, covered entities represent and warrant that the request pertains solely to the number of accumulated units that could not be replenished at the 340B ceiling price prior to the rebate model's effective date. Further, Merck reserves the right to monitor accommodation requests and may take action to recoup any rebate amounts issued in error.

Details that Make a Difference

Financial reporting and maintaining auditable records



Hold Beacon and manufacturers accountable. Vigilantly compare bank statements with Beacon's documented rebate remittance.

Another CE or TPA erroneously submits **YOUR** CE's qualified claim first



Beacon will issue rebate payments to the first CE upon submission and does not verify the originating written location.

Beacon/manufacturers lobbying HRSA to allow purchase data collection



If approved, Beacon will require purchase dates PRIOR to DOS.

Grantee child site designations



Add all child site IDs to Beacon login and submit data associated with child sites separately.

Verify bank account to receive rebate payments



Establish 'Beacon Disc Pymt' as a trusted partner in your ERP system.

We're Here to Help!

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