# Rebate Model Myths — and Facts

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### Myth: 340B compliance requirements do not apply.

According to the HRSA 340B FAQs, as with all 340B program requirements, auditable records should be maintained for both covered entities and manufacturers. OPA will incorporate compliance with the rebate model in audits of both covered entities and manufacturers.

## Myth: This rebate model only applies to certain entity types.

The rebate model applies to all covered entity types, regardless of whether you are a hospital, health center, or other grantee.

# Myth: This is only for contract pharmacy, not my retail-owned pharmacy or medical claims.

The rebate model will apply for all 340B program purchases. This applies to any retail or hospital owned pharmacy, any contract pharmacy within your network, and mixed-use medical claims.

## Myth: This only applies to certain payors.

While the Maximum Fair Price (MFP) calculation and reimbursement only applies to Medicare Part D payors, the rebate model applies to all payors for the associated claims.

## Myth: My state has contract pharmacy laws; I am protected and exempt.

State contract pharmacy laws do not supersede this requirement. States with contract pharmacy laws that are active still must participate in the rebate model.

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### What should my covered entity do next?

Beacon Channel Management, a company of Second Sight Solutions, is the vendor that has been selected by all eight manufacturers to administer the rebate model January 1, 2026. While Beacon and 340B ESP are both part of Second Sight Solutions, entities must maintain registrations with both platforms.

Entities can navigate to the <u>Beacon Rebate Model enrollment page</u>. Before registering, entities will need the following documentation to complete registration:

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

Once a covered entity is enrolled, their information is validated by a third-party adhering to "know your business" standards. Once validated, registered users will be able to establish credentials and complete multi-factor authentication set up. After this is complete, banking information will be submitted for ACH payments. ACH information must be successfully verified.

The registration and enrollment process is not immediate. Covered entities should begin this process now to ensure completion ahead of the January 1 date for implementation of rebate models.

If entities have questions, Beacon has multiple support options, including call, chat, or email.

Phone: 878.788.8907

Email: support@beaconchannelmanagement.com

Phone and chat support are available M-F, 9 AM to 9 PM EST. Emails can be submitted anytime, and Beacon will respond within 24 hours.

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### Resources

HRSA FAQs: 340B Rebate Model Pilot Program | HRSA

Manufacturer Notices: https://cm.beaconchannelmanagement.com/pages/resources

Beacon Webinar Calendar: <a href="https://support.beaconchannelmanagement.com/en/articles/9519227-">https://support.beaconchannelmanagement.com/en/articles/9519227-</a>

beacon-support-calendar

Beacon FAQs: https://support.beaconchannelmanagement.com/en/articles/9589827-rebate-model-

frequently-asked-questions#h ecb842f8c4

## SunRx is here to help!



**Questions?** Contact **Dwayne Dodd**.

Dwayne is the Regional Manager at SunRx. He can be reached at <a href="mailto:ddodd@sunrx.com">ddodd@sunrx.com</a>.

SunRx is here to help you simplify your 340B program administration and is a trusted 340B partner.

SunRx 340B solutions include:

- Navigating through the Rebate Model Pilot Program
- Contract Pharmacy
- Uninsured 340B Prescription Discount Card
- Specialty Pharmacy
- Referral Capture
- Advanced Claims Capture
- Split Billing

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