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## Rebate Model Myths — and Facts!

### **Myth: Because the rebate model didn't go live on January 1, there were no changes January 1 for entities.**

While the rebate model is on pause, working its way through the court system, the Inflation Reduction Act (IRA) did go into effect. This legislation introduced a new price point, Maximum Fair Price (MFP). Reimbursement at MFP affects Medicare Part D payors and Medicare Part B payors, as well, in 2028. Covered entities could have an impact to their 340B Savings.

### **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.



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## **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.

## **What should covered entities be doing now?**

Covered entities should be signing up for Beacon Channel Management if they did not complete that prior. It is the vendor that has been selected by all nine 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 Beacon Rebate Model enrollment page, <https://cm.beaconchannelmanagement.com/enrollments/registrations>. 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.**

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

Phone: 878.788.8907

Email: [support@beaconchannelmanagement.com](mailto: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.

Covered entities should understand their payor mix, especially for IRA 2026 products, which will help them understand any financial impacts that might occur.

The IRA product list will continue to grow into 2027 and beyond with a number of products being added each year. There are 15 products being added in 2027 and covered entities can complete financial analysis to understand impact on their 340B program now as MFP pricing has been released.

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## Resources

HRSA FAQs: [340B Rebate Model Pilot Program | HRSA](#)

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

Beacon Webinar Calendar: <https://support.beaconchannelmanagement.com/en/articles/9519227-beacon-support-calendar>

Beacon FAQs: [https://support.beaconchannelmanagement.com/en/articles/9589827-rebate-model-frequently-asked-questions#h\\_ecb842f8c4](https://support.beaconchannelmanagement.com/en/articles/9589827-rebate-model-frequently-asked-questions#h_ecb842f8c4)

CMS 2026 IRA Fact Sheet: [Medicare Drug Price Negotiation Program: Negotiated Prices for Initial Price Applicability Year 2026](#)

CMS 2027 IRA Fact Sheet: [Fact Sheet: Medicare Drug Price Negotiation Program 2027](#)

## SunRx is here to help!

If you have questions, please reach out to your dedicated account executive. Be on the lookout for more informative content via email and webinars.