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KMAP GENERAL BULLETIN 25304

HRSA 340B Rebate Model Pilot Program FAQ Bulletin

The Health Resources and Services Administration (HRSA) has a 340B Rebate Model Pilot Program that is going live on January 1, 2026. Below is a frequently asked question related to this pilot program, along with an answer.

FAQ: How should medications participating in HRSA's 340B Rebate Model Pilot be billed?

For any drugs in the HRSA's 340B Rebate Model Pilot Program, Actual Acquisition Cost (AAC) is the 340B ceiling price once rebate is paid. It is NOT the upfront price paid (i.e. wholesale acquisition cost). For more information, please refer to <https://www.hrsa.gov/opa/340b-model-pilot-program>. For reference, HRSA's last FAQ question is cited below:

What acquisition cost should I use for Medicaid billing purposes?

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.

WAC – Wholesale Acquisition Cost

OPAIS – Office of Pharmacy Affairs Information System

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