



PHARMACY FACTS

*Current information for pharmacists about
the MassHealth Pharmacy Program*

www.mass.gov/lists/masshealth-pharmacy-facts-2016-current

Editor: Ryan Bettencourt

Contributors: Eliza Anderson, Rena Cui, Aimee Evers, Breeyn Green, Neha Kashalikar,
Kim Lenz, McKenzie McVeigh, Katelyn Meyer, Jennifer O'Keefe, Kyle Semmel.

Claim Processing Instructions for 340B Rebate Model Pilot Program

The Health Resources and Services Administration (HRSA) Office of Pharmacy Affairs (OPA) has approved eight plans for participation in the 340B Rebate Model Pilot Program with a January 1, 2026, start date. For more information on the 340B Rebate Model Pilot Program, including the participating manufacturers and selected drugs please visit www.hrsa.gov/opa/340b-model-pilot-program.

MassHealth pharmacies that have been registered by the MassHealth Pharmacy Program to use 340B medications must follow payment guidelines for 340B drugs in accordance with 101 CMR 331.07(1)(a), which states,

The payment for drugs other than blood clotting factor obtained through the 340B Drug Pricing Program and dispensed by 340B covered entities is the 340B actual acquisition cost (340B AAC) of the drug plus the appropriate dispensing fee as listed in 101 CMR 331.06.

The 340B AAC is defined in 101 CMR 331.00 as,

The amount a 340B covered entity pays for a drug purchased through the 340B Drug Pricing Program, net of discounts, rebates, charge backs, and other adjustments to the price of the drug.

Claim Processing

When submitting 340B pharmacy claims to the Pharmacy Online Processing System (POPS), pharmacies must ensure that the **Submitted Ingredient Cost field** (409-D9) is the 340B AAC.

For drugs purchased under the 340B Rebate Model Pilot Program, pharmacies may not submit claims using the pre-rebate purchase price; the submitted ingredient cost must be no more than the 340B ceiling price.

If a 340B entity receives discounts, rebates, charge backs, and/or other adjustments to the price of the drug that provides a 340B AAC lower than its submitted ingredient cost, the pharmacy is expected to reverse and reprocess the 340B pharmacy claim using this corrected ingredient cost.

340B Ceiling Price File

The HRSA OPA has indicated that participating manufacturers have committed to supplying a 340B ceiling price file for the covered outpatient drugs under the rebate model pilot. This file can be downloaded from the rebate model's IT platform and should be integrated into pharmacy billing software. Covered entities also have access to view the 340B ceiling prices through the [Office of Pharmacy Affairs Information System \(OPAIS\)](#) Pricing Component, which can be used to verify the accuracy of the manufacturer-provided files.

Oversight of 340B Pharmacy Claims

It is the responsibility of the submitting pharmacy to ensure correct 340B AAC is submitted on each 340B pharmacy claim. The MassHealth Pharmacy Program will be monitoring 340B pharmacy claims to ensure correct 340B prices are submitted. Any claim submitted with an incorrect 340B AAC may be subject to audit and recovery.