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Community Access National Network Responds to HRSA's Revised 340B Rebate Model Pilot Program

WASHINGTON, DC (August 4, 2026) – Today, Jen Laws, President & CEO of Community Access National Network, released the following statement in response to Health Resources and Services Administration (HRSA) announcing the revised 340B Rebate Model Pilot Program:

"The news of a refreshed 340B rebate pilot program is a respite to the unfortunate realities of egregious program growth and the problems that ensue, from lack of patient benefit to duplicate discounts. Recently, HRSA revealed that the 340B program expanded to more than $100 billion in 2025, further calling compliancy, accountability and transparency into question. Not to say CANN is as prophetic as the Oracle of Delphi, but we have been sounding this alarm for quite some time.

"The pilot integrates information provided by CANN and other stakeholders from previous comment periods including how AIDS Drug Assistance Programs (ADAPs) have successfully functioned under a rebate model and payment timelines as a matter of practical application both in contracts and relative to other federal programs.

"Further, the pilot is modest in the data it seeks to collect, scope of affected medications for which a rebate may be mandated, and recognizes the costly nature of retrospective dispute and audit processes. HRSA's role in the pilot moves from passive and reactive engagement to more active oversight, requiring manufacturers to produce regular reports as to the function of the rebate model, will provide direct communication pathways for covered entities (including technical assistance), and the agency will actively seek feedback throughout the initial year pilot to better measure the scope and quality of impact.

"Opponents of the rebate model argue that retrospective reviews and audits are sufficient enough to warrant charging discounts upfront. But this assumes a level of transparency and accountability that is currently nonexistent. Instead, a rebate model incentivizes covered entity compliance as a prerequisite to receiving 340B discounts. Retrospective reviews, audits, and dispute resolution processes are inherently reactive, identifying potential duplicate discounts only after they have occurred."