



IRA/340B Rebate IT Considerations



Agenda

- Price Files used by TPA's and EMR's
- Integration with TPA's and 340B Rebate Providers

Price Files used by TPA's and EMR's

- On 1/1/2026 Wholesaler price files are expected to have WAC pricing on the 340B Price Files (assumed)
- Wholesalers have yet to give full details as to what this will look like
 - Will price files have \$0, WAC Price or Lower IRA/340B?
 - Manufacturers have been silent as to what they plan to have in price files
- TPA logic will need to be adjusted (Term by absence for example)
- EMR's (such as EPIC) use 340B price files when states require Medicaid to bill at AAC. If the price file contains a price other than 340B this could lead to overcharge/under charge (NOTE: HRSA put out a clarification question regarding AAC billing is still to be considered at 340B Price)

Integration with TPA's and Rebate Providers

- The known Rebate providers for 340B are Beacon and Truzo
- IRA uses NCPDP – delays in getting data from NCPDP into MTF – what will happen with Rebate (using claims data verses NCPDP)
- Concern: Direct integration between the Rebate providers and TPA's
 - Beacon is hosting an upcoming Webinar on 9/9/2025 to discuss what integrations will be available
- Questions outstanding:
 - Will the feeds be two directional?
 - Will Rebate platforms allow for TPA's to integrate with them or require CE's to perform direct submission?

Other Outstanding IT related issues

- If wholesalers/Manufacturers replace 340B price with “other pricing” how will TPA’s know what the actual 340B Price is?
 - Question has been asked by Apexus with no response
 - Rebate providers have been unable to provide answers
 - What will be the source of truth?
- Based on current FAQ’s posted by HRSA – will carryover accumulations be allowed or must they be “trued up” prior to Jan 1st?
- How will pharmacies know what qualifies from 340B verses non-340B for the IRA drugs (ways to avoid duplicate discounts have been identified with CMS and Manufacturer but are not made public?)
- How will reversals work if a rebate has been paid?

Thank You!

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