

Beginning mid-2020, pharmaceutical manufacturers started overcharging covered entities (CEs) on 340B drugs shipped to CE contract pharmacies. This chart serves as a summary and timeline of these manufacturer restrictions.

Updated April 16, 2024

Manufacturer Name	Type of Restriction	Who it Applies to	Effective Date
Eli Lilly	Refusing 340B pricing for drugs dispensed at contract pharmacies; recent changes allow 340B pricing if CEs submit contract pharmacy claims data. Any covered entity that doesn't have an in-house pharmacy <u>can choose a single location contract pharmacy</u> . <u>UPDATE</u> : Need to submit data to ESP to get 340B pricing at one contract pharmacy . All CE's with or without an in-house patient pharmacy must designate one contract pharmacy location to bill to/ ship Lilly 340B priced drugs. Lilly recognizes all sites as one covered entity. CE's must register one single contract pharmacy designation and voluntary data submission by November 13, 2023, via 340BESP.com	All covered entities (CEs)	September 1, 2020 Updated restriction effective: November 16, 2023
AstraZeneca	Refusing 340B pricing for drugs dispensed at contract pharmacies. <u>May designate a single contract pharmacy</u> but <u>each parent site</u> can have one pharmacy site for itself.	All CEs	October 1, 2020 Updated restriction effective: August 1, 2023

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	<u>UPDATE:</u> Moves admin of 340B contract pharmacy program to 340B ESP. Covered entities without an on-site dispensing pharmacy will need to select a single contract pharmacy location using the 340B ESP portal.		
Sanofi	<p><u>NEW for hospitals:</u> Refusing to ship 340B-priced drugs to contract pharmacies regardless of data submission to 340B ESP. If a CE lacks an in-house, can select 1 contract pharmacy. Doesn't affect CHCs.</p> <p>Refusing 340B pricing for drugs dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that doesn't have an in-house pharmacy <u>can choose</u> a single location contract pharmacy. If submitting data to 340B ESP, can choose unlimited contract pharmacies.</p>	5 CE types: Consol, CHC, CAH, DSH, RRC, SCH	NEW for hospitals: Effective June 1, 2023 October 1, 2020
Novartis	<p>Refusing 340B pricing for drugs shipped to contract pharmacies <u>more than 40 miles away from hospitals' parent sites</u></p> <p><u>UPDATE:</u> Will exempt arrangements by Arkansas hospital-covered entities with Arkansas-based community pharmacies from current contract</p>	Hospitals only	November 16, 2020 Withdrawal of AR Restrictions Effective March 20, 2024:

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	pharmacy policy. effective March 20, 2024.		
Novo Nordisk	<p>UPDATE: Will not allow hospitals to get 340B-priced drugs to unlimited contract pharmacies even if submitting to 340B ESP</p> <p>Previously, allowed hospitals to designate two contract pharmacies to receive 340B drugs (one specialty, one regular)</p> <p>UPDATE: Will allow contract pharmacy bill to/ship to designations (one retail and/or one specialty) for all hospital CEs within Arkansas. Will also bill to/ship to orders to an unlimited number of both wholly and non-wholly owned contract pharmacies within Arkansas that provides claims level data associated with 340B dispenses made by those contract pharmacies.</p>	Hospitals only	<p>January 1, 2021</p> <p><u>New restrictions effective July 1, 2023</u></p> <p>Withdrawal of AR Restrictions:</p> <p>Effective February 1, 2024</p>
United Therapeutics	<p>Phase 1: Orders for contract pharmacy drugs accepted only if CE made a “valid 340B purchase” during first three quarters of 2020.</p> <p><u>Phase 2:</u> Then, refusing 340B pricing for drugs dispensed at all contract pharmacies, unless CE submits claims data.</p>	All CEs	<p>Phase 1: November 20, 2020</p> <p>Phase 2: December 1, 2021</p>
Boehringer Ingelheim	Will ship 340B drugs only to CEs and their child sites. Any covered entity that does not have an in-	Hospitals, CHCs	August 1, 2021

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	<p>house pharmacy <u>can choose one contract pharmacy</u> to receive 340B drugs.</p> <p>UPDATE: BI will no longer provide drugs at the 340B price on drug shipments to contract pharmacies. Any CE that doesn't have an in-house pharmacy can choose one contract pharmacy receive 340B drugs located within 40 miles of the parent site; cannot be a central fill pharmacy. Any CE that doesn't have an in-house pharmacy capable of dispensing specialty drugs may also designate one (1) specialty pharmacy from within BI's network to only dispenses OFEV at the 340B price to its patients. CEs must take action by July 14, 2023, to either designate or re-designate the single contract pharmacy location.</p>		<p>As of September 1, 2022: Includes health centers</p> <p>New restrictions: Effective August 1, 2023</p>
Merck	<p>an in-house pharmacy <u>can elect one contract pharmacy at a single location</u>.</p> <p>NEW: Will not allow multiple contract pharmacies to receive discounts even if CE submits data to 340B ESP. If a CE lacks an in-house pharmacy, can select 1 contract pharmacy within 40 miles of its parent site. Refusing 340B pricing for drugs dispensed at contract pharmacies</p>	Hospitals, CHCs	<p>September 1, 2021</p> <p>As of May 31, 2022: Includes health centers</p> <p>New restrictions: Effective June 12, 2023</p>

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	if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have Update : Effective July 31, 2023 no longer restricts 340B drugs in Louisiana or Arkansas.		
UCB	<p>Will provide 340B priced drugs to locations registered as 340B covered entities or child sites. Any covered entity that does not have an in-house pharmacy can elect one contract pharmacy at a single location.</p> <p>UPDATE: Contract Pharmacies that are owned by a CE or under common ownership by a CE Health system can be designated as a CE's single contract pharmacy but <i>will no longer be separately eligible to receive 340B pricing</i>. The single contract pharmacy location by CE without in-house pharmacy must be located within 40 miles of the CE parent site. 340B contracts administered by UCB wholesalers will no longer support provision of drugs purchased at the 340B discount price to contract pharmacies under UCB's prior policy after October 2, 2023.</p>	Hospitals only	December 13, 2021 New restrictions: Effective October 2, 2023
Amgen	UPDATE: Federal grantees will no longer be able to place bill to/ship to orders purchased at the	Hospitals only UPDATE: All grantees	Start of original restrictions: January 3, 2022

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	<p>340B price for multiple contract pharmacies. Grantees must designate a contract pharmacy by March 5th. PHS contracts administered by Amgen wholesalers will no longer support the distribution of drugs purchased at 340B price to the 340B contract pharmacies after March 19.</p> <p><u>Update:</u> Conditions have been placed on 340B sales and deliveries to covered entity in-house pharmacies. A hospital must designate a pharmacy by March 27.</p> <p>If you do not have an in-house pharmacy, you can pick ONE contract pharmacy, AND you must share claims data AND the pharmacy must be within 40 miles of the parent.</p> <p>If you do have an in-house pharmacy, same rules (one pharmacy within 40 miles and must share data).</p> <p><u>UPDATE:</u> Contract pharmacy arrangements between 340B covered entities in Arkansas and pharmacies in Arkansas are exempt from Amgen's 340B contract pharmacy policy.</p>		<p>New restrictions: Effective March 19, 2024</p> <p>New restrictions: Effective April 11, 2023</p> <p>Withdrawal of AR Restrictions: Effective April 2, 2024</p>
AbbVie	Refusing 340B pricing for drugs dispensed at contract pharmacies	Hospitals only	February 1, 2022

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	<p>if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy can elect one contract pharmacy at a single location.</p> <p>Update: Adds Venclexta (an oral therapy to help fight certain blood cancers) to 340B list prohibited bill to/ship to orders for all hospital covered entities.</p>		New Restrictions: Effective May 1, 2024
Pfizer	<p>Refusing 340B pricing for drugs dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy can elect one contract pharmacy at a single location (single HIN)</p> <p>Update: Adds 15 more medications to the limited contract pharmacy distribution . CEs that do not have an in-house pharmacy can make their single contract pharmacy designation by October 20, 2023, at 340besp.com.</p>	Hospitals only	<p>March 1, 2022</p> <p>New Restrictions: Effective November 1, 2023</p>
Bristol Myers Squibb	Refusing 340B pricing for “non-IMiD” (Immunomodulatory imide drug) products dispensed at contract pharmacies; modifying access to 340B pricing under IMiD limited distribution	<p>Hospitals for non-IMiDs; All CEs for IMiDs</p> <p>Update: All grantees</p> <p>Update: Arkansas covered entities</p>	<p>March 1, 2022</p> <p>New Restrictions: Effective November 1, 2023</p> <p>Withdrawal of AR Restrictions:</p>

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	<p>network. Will recognize up to 2 contract pharmacies (one for non-IMiDs, another for IMiDs). UPDATE: Will recognize up to three contract pharmacies (one for Non-IMiDs, one for IMiDs, and one for Camzyos) for each CE. Only one 340B purchase on a single eligible IMiD prescription allowed. Update: Arkansas-covered entities may use any contract pharmacies properly licensed by Arkansas State Board of Pharmacy to dispense 340B-eligible covered outpatient drugs. REMS requirements stay in place.</p>		Effective March 28, 2024
GlaxoSmithKline	<p>Refusing 340B pricing for drugs dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy may designate one contract pharmacy location (single HIN) to have drugs shipped to. Applies to all drugs (especially impacts inhalers and certain HIV drugs). UPDATE: Prohibition of unlimited contract pharmacies for all CE's. Claims data is no longer a requirement under GSK's policy. CEs without an in-house outpatient pharmacy must designate one contract pharmacy</p>	Hospitals, all grantees	<p>April 1, 2022 New restrictions: Effective May 1, 2023</p>

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	<p>location. CE's unable to dispense specialty/oncology will restrict 340B pricing on of blood cancer products must designate one specialty pharmacy for each of GSK's limited pharmacy network products.</p> <p><u>Update:</u> Restrictions extend to Ojjaara, a cancer drug.</p> <p><u>UPDATE:</u> Effective November 1, 2023, covered entities in Arkansas and Louisiana will be able to get 340B-priced drugs at contract pharmacies.</p>		
Gilead	<p>Refusing 340B pricing for brand-name Hepatitis C drugs dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy <u>may designate a single contract pharmacy location.</u></p> <p>Likewise, this update does not apply to contract pharmacies that are wholly owned by a covered entity or health system.</p>	All CEs	May 2, 2022
Johnson & Johnson	<p>Refusing 340B pricing for drugs dispensed at contract pharmacies; specifically: immunosuppressants, monoclonal antibodies, blood thinners, and treatments for diabetes, cancer, HIV, mental disorders, pulmonary arterial hypertension, and chemotherapy-induced anemia. If they choose</p>	Hospitals only	<p>May 2, 2022</p> <p>New restrictions: Effective March 7, 2023</p>

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	<p>not to submit data, <u>may still designate a single contract pharmacy location</u> (single HIN). UPDATE: J&J has placed conditions on 340B sales and deliveries to covered entity in-house pharmacies. A hospital must designate a pharmacy by February 26; they define outside pharmacy as “a Ship To location that is not part of the Bill To purchaser”; If you do not have an in-house pharmacy, you can pick ONE pharmacy, AND you must share claims data AND the pharmacy must be within 40 miles of the parent. If you do have an in-house pharmacy, same rules (one pharmacy within 40 miles and must share data). Can also select a single specialty pharmacy for specialty drugs.</p>		
Exelixis	<p>Refusing 340B pricing for drugs dispensed at contract pharmacies, specifically Cometriq and Cabometyx (cancer drugs). If they choose not to submit data, <u>may still designate a single contract pharmacy location</u> (single HIN). UPDATE: Extends 340B restrictions to contract pharmacies that are wholly-owned or under common ownership with a covered entity.</p>	Hospitals only; grantees exempt “until further notice”	<p>July 6, 2022 New restrictions: Effective June 26, 2023</p>

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Bausch	<p>Refusing 340B pricing for drugs dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy <u>can elect one contract pharmacy at a single location (single HIN).</u></p> <p><u>UPDATE:</u> Extending its conditions on 340B pricing to contract pharmacies that are wholly owned or under common ownership with a hospital covered entity. Any covered entity that does not have an in-house pharmacy capable of dispensing 340B purchased drugs to its patients may designate a single contract pharmacy location within 40 miles of the covered entity.</p>	All CEs	<p>August 1, 2022</p> <p>New restrictions: Effective June 26, 2023</p>
Biogen	<p>Refusing 340B pricing for drugs, specifically Avonex and Plegridy (which treat multiple sclerosis), dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy can <u>designate one contract pharmacy location (single HIN)</u> to have drugs shipped to.</p> <p><u>Effective March 15, 2024:</u> Exempts Arkansas Covered Entities using Arkansas contract</p>	<p>Hospitals only</p> <p>UPDATE: Exempts Arkansas covered entities</p>	<p>February 1, 2023</p> <p>Withdrawal of AR Restrictions: Effective March 15, 2024</p>

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	pharmacies from previous restriction policy.		
Bayer	<p>Refusing 340B pricing for drugs dispensed at contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy can <u>designate one contract pharmacy (single HIN)</u> to have drugs shipped to. Drugs excluded from this restriction, for now, include: Adempas, Aliqopa, Jivi, Kerendia, Kogenate, Kovaltry, Kyleena, Lampit, Mirena, Skyla, Nubeqa, Xofigo.</p> <p><u>UPDATE:</u> Hospitals that lack an in-house pharmacy can designate one contract pharmacy location within 40 miles of the hospital parent site. Bayer will no longer let hospitals place replenishment orders for multiple contract pharmacies in exchange for submitting 340B claims to 340B ESP for Bayer drugs. Hospitals may voluntarily provide claims data for their single designated contract pharmacy through 340B ESP.</p>	Hospitals only	<p>March 1, 2023</p> <p>New restrictions: Effective June 1, 2023</p>
EMD Serono	Refusing 340B pricing for drugs, specifically Refib (interferon beta-1a) and Gonal-f (follitropin alfa for injection), dispensed at	Hospitals only	<p>March 1, 2023</p> <p>New Restrictions: October 1, 2023</p>

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	<p>contract pharmacies if 340B contract pharmacy claims data are not submitted. Any covered entity that does not have an in-house pharmacy can designate one contract pharmacy location (single HIN) to have drugs shipped to.</p> <p>UPDATE: Extending its restrictions to ALL medications. If a hospital CE is granted an exemption for its wholly/commonly owned contract pharmacy(ies), it may not also designate an independent contract pharmacy, except with respect to 340B purchases of <i>Serostim</i>. 340B CEs that do not have an in-house pharmacy and have not already registered an account with 340B ESP™ www.340besp.com/designations.</p>		
Organon	<p>Refusing 340B pricing for drugs dispensed at contract pharmacies if 340B contract pharmacy claims aren't submitted. Any covered entity that doesn't have an in-house pharmacy can designate one contract pharmacy location (single HIN) to have drugs shipped to.</p> <p>UPDATE: Effective December 1, 2023, covered entities in Arkansas and Louisiana will be able to receive 340B-priced drugs</p>	Hospitals only	<p>July 1, 2023 Update Effective: December 1, 2023</p>

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	to an unlimited number of contract pharmacies provided claims level data is submitted via 340B ESP for these pharmacies.		
Teva	<p>Refusing 340B pricing for drugs dispensed at contract pharmacies. Affected drugs include Copaxone, Ajoyv, and Treanda. Any covered entity that doesn't have an in-house pharmacy can <u>designate one contract pharmacy location (single HIN)</u> within 40 miles of its parent site to have drugs shipped to and must submit claims data. 340B discounted products will only be shipped to the in-house outpatient pharmacy. Designation of new pharmacy must be made by June 18, 2023. <u>UPDATE:</u> Effective September 26, 2023, allows shipment/delivery of 340B drugs to unlimited number of contract pharmacies in Arkansas; ended restrictions in Louisiana as well in July 2023. <u>UPDATE:</u> Effective October 23, 2023, Austedo and Austedo XR</p>	Hospitals only	<p>July 5, 2023 Effective: September 26, 2023 Effective: November 6, 2023</p>

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	product families are now a part of 340B Program Integrity Initiative.		
Astellas	<p>Refusing 340B pricing, specifically for its prostate cancer drug Xtandi, to contract pharmacies. Any covered entity that doesn't have an in-house pharmacy can <u>designate one single contract pharmacy location (single HIN)</u> and must submit claims data. 340B discounted products will only be shipped to the in-house outpatient pharmacy. Designation of new pharmacy must be made by August 18, 2023. Effective October 17, 2023, will facilitate orders of Xtandi products at 340B price to an unlimited number of contract pharmacies located within the states of Arkansas and Louisiana.</p> <p><u>Update:</u> Will no longer facilitate bill to/ ship to orders of Myrbetriq (treats overactive bladder) at the 340B discount price to contract</p>	Hospitals only	<p>September 1, 2023</p> <p>New Restriction effective: May 1, 2024</p>

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	pharmacies. Federal grantee covered entities are excluded from this policy change. Covered entities in Arkansas and Louisiana will be able to bill to/ ship to orders of Myrbetriq products at 340B discount price to an unlimited number of contracts pharmacies location within each respective state.		
Jazz Pharmaceuticals	Refusing 340B pricing specifically for Epidiolex products, dispensed at contract pharmacies. CE that has a contract pharmacy either wholly or commonly owned, must use wholly owned pharmacy as the single contract pharmacy or designate one contract pharmacy location by September 29, 2023 at 340B ESP .	Hospitals only	October 9, 2023
Incyte	Refusing 340B pricing for Opzelura dispensed at contract pharmacies. CE without an in-house outpatient pharmacy may designate one contract pharmacy location within 40 miles of CE parent site. CE without an in-house outpatient pharmacy, must designate one contract pharmacy location by October 6, 2023, at 340B ESP . If CE can't identify an eligible contract pharmacy, Incyte	Hospitals only	October 16, 2023

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	will work with CE to find a suitable alternative.		
Eisai	Refusing 340B pricing for drugs dispensed at contract pharmacies. CE will no longer be able to place orders to bill to/ship to Eisai-covered outpatient drugs for delivery to CPs. CEs without an in-house outpatient pharmacy must designate one contract pharmacy location by October 22, 2023, at 340B ESP .	Hospitals only	November 1, 2023
Sandoz	Covered entity hospitals must designate 1 contract pharmacy location within 40 miles of the CE parent for shipment of listed products at the 340B price . If CE lacks both in-house or wholly owned pharmacy, Sandoz and its vendor will work with CE to identify an appropriate contract pharmacy to dispense covered outpatient drugs. Visit 340besp.com to designate a single	Hospitals only	December 1, 2023

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	contract pharmacy before December 1, 2023.		
Takeda	<u>Refusing 340B-priced drugs</u> <i>(Entyvio Pen, Entyvio IV, Trintellix, Motegrity, Mydayis, Dexilant, Adderall XR, Pentasa, and Vyvanse)</i> to hospital covered entity contract pharmacies. Any CE without in-house pharmacy may designate a single independent contract pharmacy location OR its wholly owned contract pharmacy(ies) <i>within 40 miles of the CE parent site</i> , to get 340B priced products. CE's must provide claims data through <u>340B ESP</u> for the designated single contract pharmacy or wholly owned contract pharmacy(ies) to receive 340B discounted pricing.	Hospitals only	January 22, 2024

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Liquidia	Refusing 340B pricing of <i>Yutrepia (treprostinil)</i> at covered entity contract pharmacies. Any covered entity that does not have an in-house pharmacy may designate a single Accredo or Caremark/CVS Specialty contract pharmacy location. The covered entity must agree to provide claims data for the designated single contract pharmacy within 45 days of the date of dispense. The 340B ESP platform will be used to support this designation and claims submission.	All covered entities	April 1, 2024

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Genentech	Will limit 340B priced drugs exclusively to a single contract pharmacy and locations registered as a 340B covered entity or child site with affiliated covered entity. This change is applicable to medicines adjudicated through a retail or specialty pharmacy and will not apply to <i>Hemlibra</i> and <i>Evrysdi</i> . Voluntary submission of claims is encouraged to support program transparency.	Hospitals only	May 1, 2024
Sumitomo Pharma	Will provide 340B price for APTIOM®, GEMTESA®, MYFEMBREE®, and ORGOVYX® brands exclusively to locations registered as a 340B covered entity. A contract pharmacy beyond the 40-mile radius may be used if the covered entity shows it either lacks an in-house pharmacy or there is no contract pharmacy capable of purchasing and dispensing the above drug within a 40-mile radius provided the contract pharmacy selected is not a centralized pharmacy replenishment facility or “central-fill pharmacy”. PHS contracts administered by SMPA wholesalers will no longer support distribution of 340B purchased drugs to 340B contract pharmacies after April 30, 2024.	All covered entities	May 1, 2024

