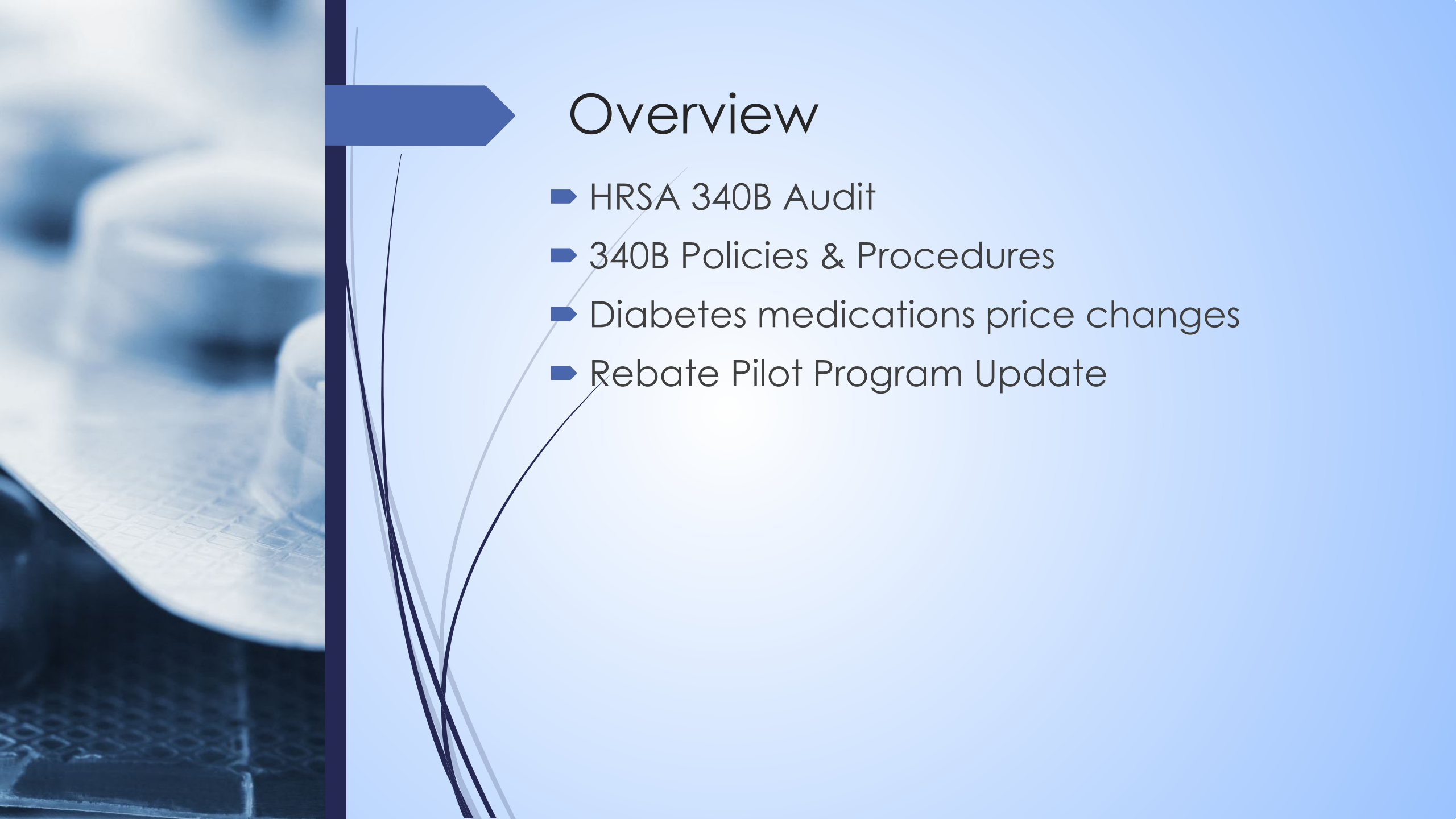




PHARMACY-FINANCE WORK GROUP UPDATE JULY 21, 2026



Todd Bleak, Pharmacy Services Manager



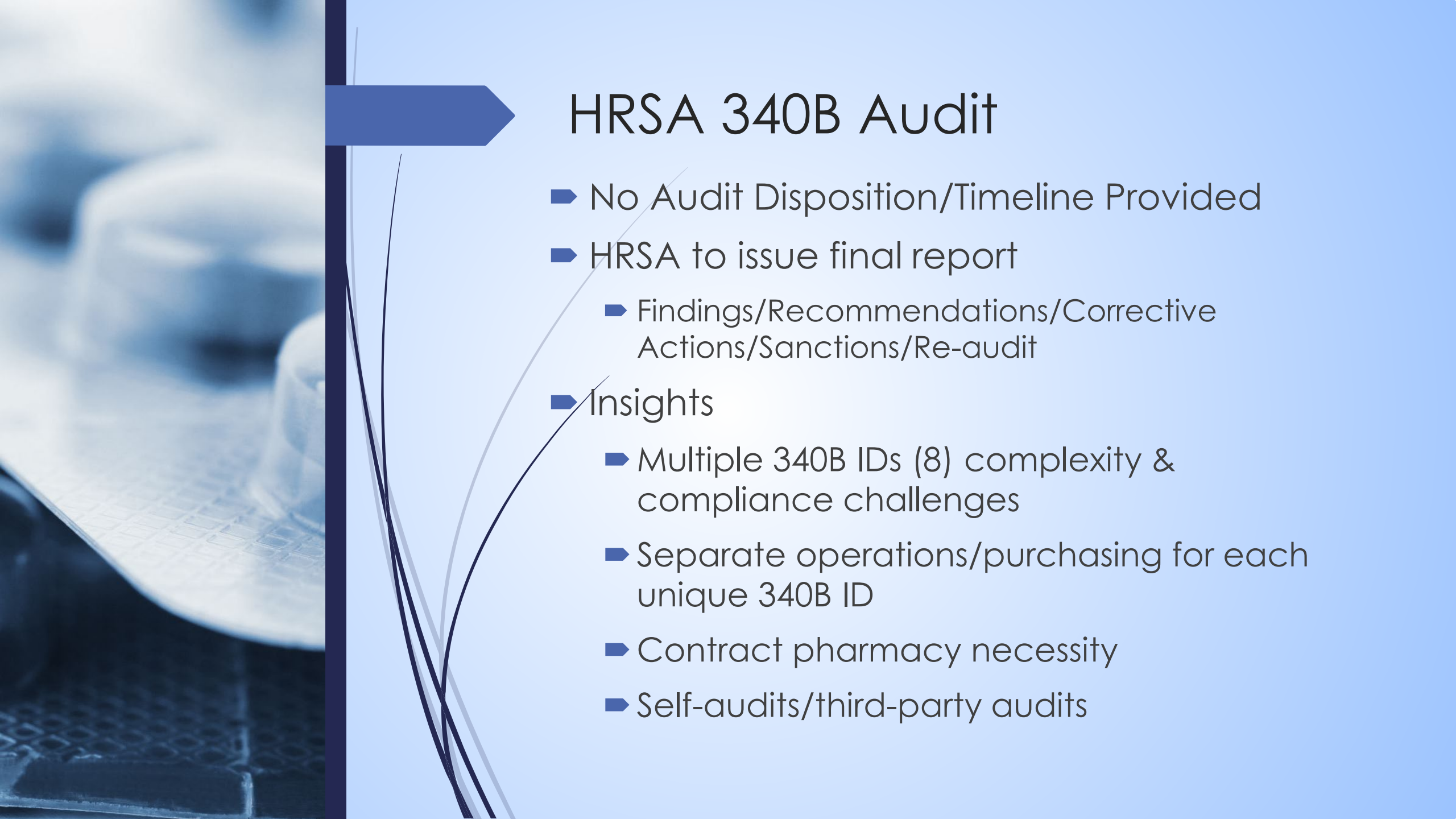
Overview

- HRSA 340B Audit
- 340B Policies & Procedures
- Diabetes medications price changes
- Rebate Pilot Program Update



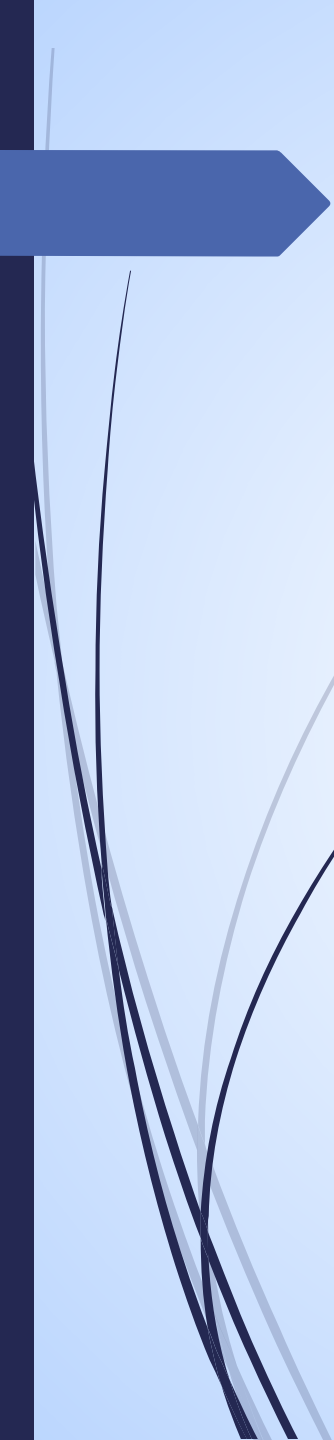
HRSA 340B Audit

- On-site Audit June 24-25
- Site/Patient/Provider Eligibility (Diversion)
 - Qualifying grants (Ryan White)
 - Purchasing records
 - Prescription records
 - Provider relationships
 - Contract pharmacies
- Medicaid Billing (Duplicate Discounts)



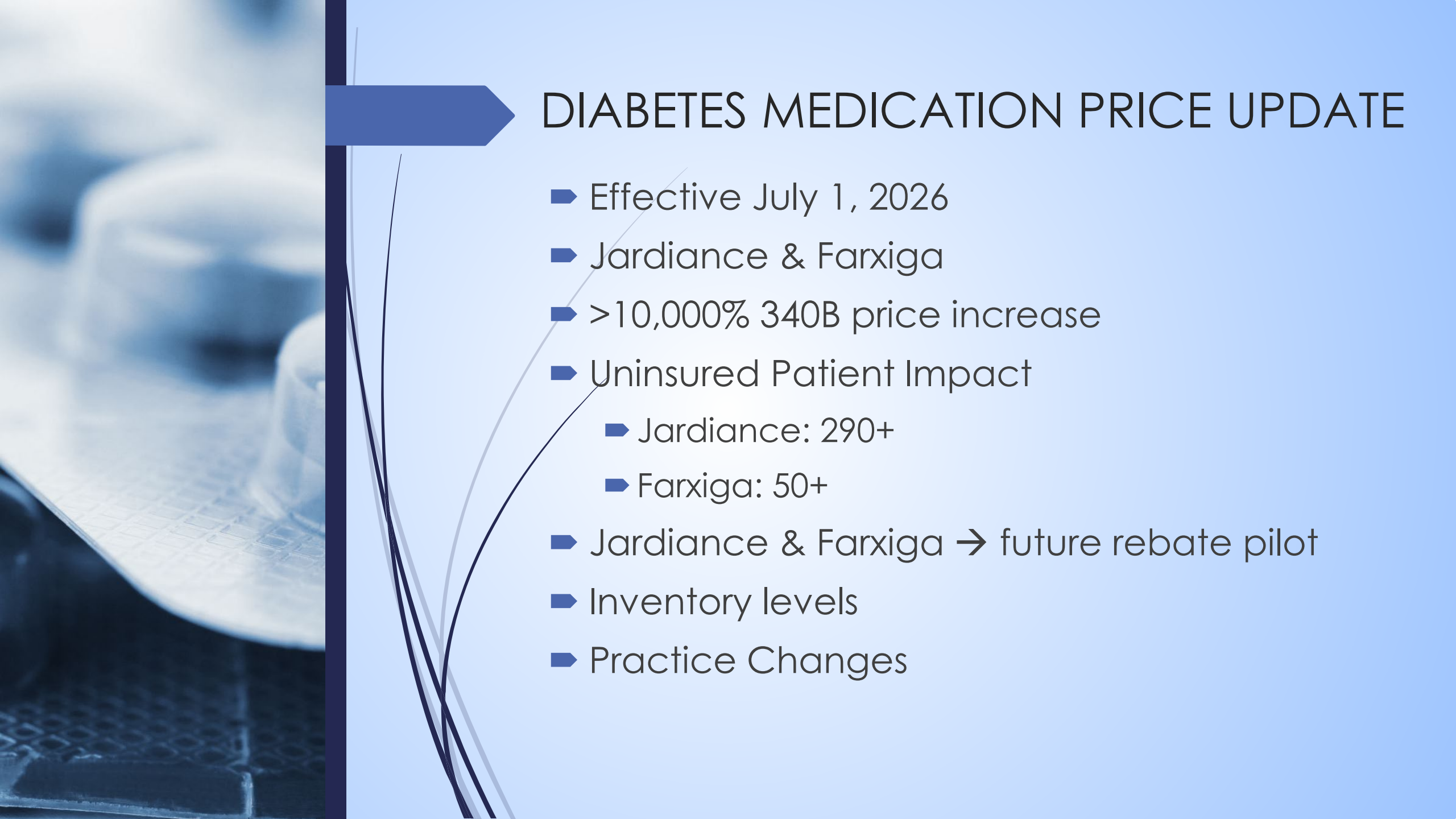
HRSA 340B Audit

- No Audit Disposition/Timeline Provided
- HRSA to issue final report
 - Findings/Recommendations/Corrective Actions/Sanctions/Re-audit
- Insights
 - Multiple 340B IDs (8) complexity & compliance challenges
 - Separate operations/purchasing for each unique 340B ID
 - Contract pharmacy necessity
 - Self-audits/third-party audits



340B Policies & Procedures

- Medication Inventory Management
- Duplicate Discounts
- Program Patient Eligibility
- Compliance Monitoring and Reporting
- Program Covered Entity Eligibility



DIABETES MEDICATION PRICE UPDATE

- Effective July 1, 2026
- Jardiance & Farxiga
- >10,000% 340B price increase
- Uninsured Patient Impact
 - Jardiance: 290+
 - Farxiga: 50+
- Jardiance & Farxiga → future rebate pilot
- Inventory levels
- Practice Changes



340B REBATE PILOT UPDATE

- FEB 25: HRSA Request For Information
 - Administrative Burden
 - Workforce Impact
 - Information Systems
 - Financial Challenges
- MAY 27: Rebate Proposal to White House OMB
- Medicare-negotiated drugs 2026 & 2027
- JAN 1, 2027 Intended Start Date
- 90-Day Notice to Stakeholders