

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.

| 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</u> a single location contract pharmacy. | All covered entities (CEs) | September 1, 2020 |
| AstraZeneca | Refusing 340B pricing for drugs dispensed at contract pharmacies. <u>May designate a single contract</u> <u>pharmacy</u> but <u>each parent site</u> can have one pharmacy site for itself. | All CEs | October 1, 2020 |
| Sanofi | 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. | 5 CE types: Consol, CHC, CAH, DSH, RRC, SCH | October 1, 2020 |
| Novartis | Refusing 340B pricing for drugs shipped to contract pharmacies <u>more than 40 miles away</u> from hospitals' parent sites | Hospitals only | November 16, 2020 |
| Novo Nordisk | Refusing 340B pricing for drugs shipped to contract pharmacies. | Hospitals only | January 1, 2021 |



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| | Can designate two contract pharmacies to receive 340B drugs (one specialty, one regular) | | |
| United Therapeutics | Phase 1: Orders for contract pharmacy drugs accepted only if CE made a "valid 340B purchase" during first three quarters of 2020.Phase 2: Phase 2: Then, refusing 340B | All CEs | Phase 1: November 20, 2020 Phase 2: December 1, 2021 |
| Boehringer Ingelheim | Will ship 340B drugs only to CEs and their child sites. Any covered entity that does not have an in- house pharmacy <u>can choose one</u> <u>contract pharmacy</u> to receive 340B drugs. | Hospitals only | August 1, 2021 |
| Merck | 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</u> one contract pharmacy at a single location. | Hospitals, CHCs | September 1, 2021 As of May 31, 2022: Includes health centers |
| UCB | 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 <u>can</u> <u>elect</u> one contract pharmacy at a single location. | Hospitals only | December 13, 2021 |
| Amgen | Refusing 340B pricing for drugs dispensed at contract pharmacies | Hospitals only | January 3, 2022 |



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|----------------------|-----------------------------------|----------------------------------|------------------|
| | 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) | | |
| AbbVie | Refusing 340B pricing for drugs | Hospitals only | February 1, 2022 |
| | 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. | | |
| Pfizer | Refusing 340B pricing for drugs | Hospitals only | March 1, 2022 |
| | 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) | | |
| Bristol Myers Squibb | Refusing 340B pricing for "non- | Hospitals for non-IMiDs; All CEs | March 1, 2022 |
| | IMiD" (Immunomodulatory | for IMiDs | |
| | imide drug) products dispensed at | | |
| | contract pharmacies; modifying | | |
| | access to 340B pricing under | | |
| | IMiD limited distribution | | |
| | network. Will recognize up to 2 | | |
| | contract pharmacies (one for | | |
| | non-IMiDs, another for IMiDs). | | |
| GlaxoSmithKline | Refusing 340B pricing for drugs | Hospitals only | April 1, 2022 |
| | dispensed at contract pharmacies | * * | • · |
| | if 340B contract pharmacy claims | | |
| | data are not submitted. Any | | |



| Manufacturer Name | Type of Restriction | Who it Applies to | Effective Date |
|-------------------|---|-------------------|----------------|
| | covered entity that does not have an in-house pharmacy can <u>designate one contract</u> <u>pharmacy location (single HIN)</u> to have drugs shipped to. | | |
| Gilead | 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</u> <u>single contract pharmacy</u> <u>location</u> . Likewise, this update does not apply to contract pharmacies that are wholly owned by a covered entity or health system. | All CEs | May 2, 2022 |
| Johnson & Johnson | 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 not to submit data, <u>may still designate</u> <u>a single contract pharmacy</u> <u>location (single HIN).</u> | Hospitals only | May 2, 2022 |

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