



April 20, 2026

Administrator Thomas J. Engels
Health Resources and Services Administration
5600 Fishers Lane
Rockville, MD 20857

Electronically Submitted via
[regulations.gov](https://www.regulations.gov)

RE: Request for Information: 340B Rebate Model Pilot Program (HRSA-2026-03042)

Dear Administrator Engels:

The Chronic Care Policy Alliance (CCPA) appreciates the opportunity to provide input as the Health Resources and Services Administration (HRSA) considers potential reforms to the 340B Drug Pricing Program, including exploration of a rebate-based model.

The 340B program plays an important role in supporting safety-net providers and improving access to care for low-income and underserved patients. However, as the program has evolved, ongoing questions about transparency, accountability, and oversight have raised concerns about whether its current structure consistently ensures that savings are reaching patients.

The rapid growth of contract pharmacies and increasing vertical integration among program participants has added further complexity and underscores the need for clearer guardrails and greater visibility into how program funds are generated and used. At the same time, there is growing, bipartisan recognition that reforms are needed to strengthen the program and ensure it more effectively supports patients and the providers who serve them.

CCPA supports HRSA's interest in exploring a rebate-based model as a potential pathway to improve the program's transparency and accountability. Compared to the current upfront discount structure, a rebate model may offer greater visibility into transactions and create clearer mechanisms to track how 340B savings are generated and ultimately used. This approach could help better align program savings with patient access and affordability, while also reinforcing consistent expectations for covered entities and their partners.

Importantly, efforts to reform the 340B program should be viewed as an effort to strengthen, not weaken, the program. Calling for greater transparency and clearer expectations is not a call to dismantle 340B, but rather to ensure it functions in a way that more directly benefits the patients it is intended to serve.

As HRSA evaluates a rebate-based approach, we encourage careful consideration of how the model can be implemented in a way that ensures that savings are more directly connected to patient benefit. Strengthening oversight and transparency will be essential to ensuring the program delivers for patients in a more consistent and measurable way.

Thank you for your consideration and your continued commitment to patients.

Sincerely,

A handwritten signature in blue ink that reads "Elizabeth Helms".

Elizabeth Helms
CEO
Chronic Care Policy Alliance (CCPA)
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