



August 28, 2026

The Honorable Bill Cassidy, Chair
Senate Committee on Health, Education, Labor, and Pensions (HELP)
428 Dirksen Senate Office Building
Washington, DC 20510

Submitted electronically via
340bforpatients@help.senate.gov

RE: 340B Drug Pricing Integrity and Affordability for Patients Act (340B for Patients Act)
Discussion Draft

Dear Chairman Cassidy:

On behalf of the Chronic Care Policy Alliance (CCPA), we appreciate the opportunity to provide comments on the discussion draft of the 340B Drug Pricing Integrity and Affordability for Patients Act (340B for Patients Act).

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.

CCPA believes safeguards are essential to protecting the long-term strength and sustainability of 340B. We particularly support provisions of the discussion draft that would ensure program benefits reach patients, improve transparency, and promote greater program integrity.

Ensure the Program Benefits Patients

The fundamental measure of 340B's success should be whether it benefits the patients the program was created to serve. CCPA supports establishing clearer expectations that connect participation in 340B with its safety-net purpose, including provisions that would:

- Establish a clear definition of a 340B patient to help ensure discounted drugs are associated with individuals who have a meaningful relationship with the covered entity and receive care through that entity or an appropriate referral.
- Create a sliding fee scale for low-income and uninsured patients that directly limits eligible patients' out-of-pocket obligations for 340B drugs based on income.
- Strengthen eligibility requirements for covered entities by requiring verification that their patient populations are primarily low-income or uninsured.

Improve Program Transparency

Meaningful transparency is critical to understanding how 340B resources are generated and used and whether the program is consistently supporting patients. Greater visibility can also strengthen public confidence and help policymakers identify where the program is working



effectively and where additional oversight may be needed. CCPA supports provisions that would:

- Establish annual reporting requirements for covered entities, including information regarding the number and types of individuals receiving 340B drugs, costs, charity care, and margins generated from covered outpatient drugs.
- Make reported information publicly available through HRSA in an electronic and searchable format, providing patients, policymakers, and the public with greater visibility into program operations.

Ensure Program Integrity

As 340B has become more complex, the number of entities and intermediaries involved in program transactions has also grown. Clearer rules and appropriate safeguards can help prevent duplication, reduce opportunities for program resources to be diverted away from patients, and ensure participating entities continue to fulfill the program's purpose. CCPA supports provisions that would:

- Advance a rebate-based model for 340B discounts to improve transparency, prevent duplicate discounts, and strengthen program integrity rather than relying on a centralized clearinghouse.
- Establish guardrails for pharmacy benefit managers that limit compensation tied to drug prices or the value of 340B discounts, helping ensure program resources are not unnecessarily captured by middlemen.
- Ensure contract pharmacies and hospital child sites meet program requirements, appropriately serve eligible patients, and remain connected to 340B's safety-net mission.

CCPA believes the 340B Program is a vital component of the nation's health care safety net. We believe in strengthening transparency, accountability, and program integrity to protect the program and ensure it can continue serving patients for years to come and appreciate your leadership in developing the 340B for Patients Act. We look forward to working with you and other policymakers as 340B focused legislation moves forward in the future.

Sincerely,

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