

IRA/MFP and 340B Rebate Pilot

What Pharmacies Need to Know for 2026:

Disclaimer: This document is not intended to be legal advice and is based on currently available information.

Understand the Two Separate Rebate Programs:

1. Medicare Drug Price Negotiation (IRA / MFP)- MFP Rebate

- Applies to MTF Drugs and Medicare payors only
- NOT a 340B program
- Uses Manufacturer Transaction Facilitation (MTF) for manufacturer refunds
- Pharmacies must register with MTF if dispensing MFP drugs to Medicare patients
- Contract Pharmacy registration with Beacon's MTF portal is optional but recommended
- MTF Registration – REQUIRED for Medicare MFP Rebates
- MTF Portal: <https://mtf.cms.gov/mtfdm/login>

- Register the **contract pharmacy** with **MTF**
- Validate legal name, NPI, TIN, and payment details
- Confirm banking information for rebate payments
- Identify internal users and access roles

2. 340B Drug Rebate Pilot Program

- Applies to 340B-eligible MFP Drugs for **ALL** Payors
- Replaces traditional upfront discount for MFP Drugs
- CE will purchase medications at WAC (Wholesale Acquisition Cost) and receive rebate after claim submission
- Uses Beacon for tracking/reconciliation
- Covered Entity **MUST** register with Beacon and submit claims in order to receive rebate
- Beacon Registration for Contract Pharmacy (optional):
<https://mfp.beaconchannelmanagement.com/registrations>

Covered Entity (CE) – REQUIREMENTS IF PARTICIPATING IN REBATE PILOT

- Confirm CE has **registered with Beacon**
- Confirm CE understands:
 - Claim-level submission requirements
 - Rebate invoicing timelines
 - Dispute process

- Does CE have plans on how to submit pharmacy and medical claims (if applicable) to Beacon? (TPA, Manual Submission, Consultant, etc.)

- If CE intends to participate in 340B Rebate pilot, has a decision been made on which MFP drugs to include in 340B?

Depending on TPA capability, there are three options for choosing which MFP drugs to include in 340B:

1. Full carve-out of Top 10 drugs
 - Simplifies duplicate rebate avoidance
 - Results in the greatest 340B savings loss for both pharmacy and CE

2. Medicare-only carve-out of Top 10 drugs
 - Reduces duplication risk while preserving some 340B opportunity
 - Requires stronger coordination and reconciliation processes

3. Selective carve-out based on financial comparison
 - Potentially preserves the most value
 - Requires the highest level of data analysis, collaboration, validation, and ongoing oversight.

Effective 1/1/26, unless registration with Beacon is complete AND claims are submitted to Beacon, no MFP drugs will be 340B eligible for any patients at the contract pharmacy or at the hospital/clinic. This means the CE will be paying WAC and will receive no rebate.

No CE Beacon Registration/Claim Submission = No 340B Rebate

3. Uninsured/Cash prescriptions - if applicable

- Document plan for uninsured/cash prescriptions if MFP drugs have been carved out
- Will claims for uninsured patients receiving an MFP drug continue to qualify as 340B eligible?
- How will patient copay be calculated for uninsured patients receiving MFP drugs?
- If MFP drugs are excluded from 340B qualification, what will be the expected workflow for ensuring patient access?

How Secure340B Can Help

If you or your CE needs assistance evaluating these options, submitting Beacon claims, designing rebate workflows, or validating rebate receipt and reconciliation, Secure340B can provide support. We work alongside CEs, pharmacies, and TPAs to translate these decision paths into operationally sound processes and to provide ongoing oversight as guidance continues to evolve.

Pharmacies are encouraged to include Secure340B in these discussions when additional expertise or independent validation would be helpful.

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