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Boehringer Ingelheim

UPDATE

Boehringer Ingelheim 340B Program Policies

Notice to 340B Covered Entities: Effective January 1, 2027

The Health Resources and Services Administration (HRSA) launched the 340B Rebate Model Pilot Program ("Rebate Model") as a mechanism to effectuate the 340B ceiling price on select drugs across all covered entities. Boehringer Ingelheim's ("Boehringer") participation in the program has been approved by HRSA.

Boehringer strongly supports the 340B program and remains committed to its mission of expanding patient access to essential medications for the patients we serve today and into the future. However, we are concerned about well-documented integrity and oversight issues that have caused the program to drift from its original intent. Limited transparency around 340B-eligible prescriptions and profit flows within the supply chain undermines the program's effectiveness.

Our policies aim to reinforce the program's core purpose—ensuring vulnerable and uninsured patients benefit directly from its resources. We believe the initiatives outlined in our policies will further strengthen the program and support its core mission to ensure patients have access to the medications they need.

Please take notice that Boehringer has updated its 340B Program Policies to include HRSA's Rebate Model. As detailed in Part I of the 340B Program Policies below, effective January 1, 2027, the Rebate Model will apply to all covered entity types for Boehringer's Jardiance®, Ofev®, and Tradjenta® branded products, which are subject to 2026 and 2027 Maximum Fair Price (MFP).

Boehringer continues to implement its 340B Program Contract Pharmacy Policy and 340B Program Claims Collection Policy, included in Part II and III of this policy, respectively. The contract pharmacy policy requirements will continue to apply to MFP products in scope for the Rebate Model and to all other non-MFP Boehringer products whose 340B price is effectuated through an upfront discount (see Part II of the 340B Program Policies below). For non-MFP products, Boehringer's claims submission policy will continue to apply (see Part III of the 340B Program Policies below). The FAQ sections provide additional information on all Boehringer's 340B Program Policies.

Best Regards,

DocuSigned by:
Christine Marsh
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Christine G. Marsh
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Part I: The 340B Rebate Model Pilot Program
2026/2027 MFP Products

The Health Resources and Services Administration ("HRSA") launched the 340B Rebate Model Pilot Program ("Rebate Model") as a mechanism to effectuate the 340B ceiling price on select drugs to all covered entities. Through the Rebate Model, manufacturers with 2026 and 2027 Maximum Fair Price ("MFP") selected drugs may provide the 340B price through a rebate. Boehringer's participation in the program has been approved by HRSA, and Boehringer remains committed to working with HRSA and covered entities to successfully implement the 340B Rebate Model Pilot Program.

Effective January 1, 2027, Boehringer will be evolving how the 340B pricing is effectuated on Boehringer products that are subject to the 2026 and 2027 MFP (See Attachment A for list of NDCs). Covered entities are encouraged to clear all existing 340B accumulations in accordance with Boehringer 340B Program Contract Pharmacy Policy and replenish eligible claims prior to January 1, 2027. In summary, the Rebate Model works as follows:

Step 1 **Purchase**
Covered entity will purchase MFP products at the commercial price (wholesaler acquisition cost "WAC") through their 340B wholesaler account.

Step 2 **Dispense**
Product(s) are dispensed or administered to 340B eligible patient(s) of the covered entity.

Step 3 **Submit**
Limited claims data must be submitted by the covered entity to the Beacon platform for the dispensation or administration of MFP products to eligible 340B patient(s).

Step 4 **Rebate**
Covered entity will receive a 340B rebate payment, calculated as the difference between WAC less the 340B ceiling price in effect during the calendar quarter for which the product was dispensed, within 10 calendar days of successful submission and validation of 340B claims data.

Below are additional details on the Purchase, Claims Submission, and Payment Process under the Rebate Model.

Purchase: For products included in Attachment A, covered entities will purchase product at WAC. Covered entities should order these products through their 340B wholesaler account, when available.

Submit Claims & Validation of Data: Covered entities must submit limited pharmacy claims and medical claims data elements to the Beacon platform within 45 days after a covered drug is dispensed or administered to an eligible 340B patient. Additional information on the specific data elements required for the rebate model claim submission is available in Attachment B. Following receipt of complete rebate claims, the Beacon platform will validate the claims. Claims will be eligible for 340B rebate based on the following criteria:

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- Product was purchased by an eligible covered entity at WAC on or after January 1, 2027.[1]
- Product was dispensed or administered by an eligible covered entity via their in-house pharmacy or through their designated contract pharmacy(ies), as registered on HRSA OPAIS and in accordance with Boehringer's 340B Program Contract Pharmacy Policy (see Part II of the 340B Program Policies below).
- Product was dispensed or administered to an eligible 340B patient of the covered entity in accordance with HRSA's 1996 Patient Definition Guidelines, see 61 Fed. Reg. 55156 (Oct. 24, 1996).
- Rebate model claims data (as described in Attachment B) is submitted within 45 days of the dispense or administration of the Boehringer MFP Product.
- A 340B rebate has not already been paid on the 340B claim to the same or a different covered entity.

Rebate Payment Process: Covered entities will receive a rebate within 10 calendar days of complete submission and validation of rebate model claims data. All 340B rebates will be calculated at dispensed or administered unit level constituting the difference between WAC and the 340B ceiling price of the product as of the date the product was dispensed or administered. Boehringer strongly encourages covered entities to submit rebate model claims data for dispensed or administered products in a timely manner. Ineligible claim submissions will not be included in the rebate payment process. In the event of such a denial, covered entities will have the opportunity to submit alternative data for the same rebate model claim to establish 340B eligibility. Boehringer will work with covered entities in good faith if the entity believes that it should have received a 340B rebate on a denied claim submission.

Beacon Platform

Boehringer is utilizing the Beacon platform to effectuate the rebate model. Beacon is made available free of charge. Covered entities should visit www.cm.beaconchannelmanagement.com to register their account and learn more about the 340B rebate payment process. Beacon's Support Center provides a variety of resources including webinars, recorded platform demonstrations and FAQ documents. Covered entities can also register to participate in live webinars, and information on how Beacon protects financial, and healthcare related information is available online in the Trust Center.

Please visit www.cm.beaconchannelmanagement.com and click on "Resources" to download templates and other important resources. Covered entities may email direct inquiries related to the use of Beacon, including IT inquiries, technical assistance for setting up claims submission files, questions related to Boehringer's policy or any other issue, please contact support@beaconchannelmanagement.com or call 1-878-788-8907. Covered entities may also contact Boehringer at 340brebatemodel.rdg@boehringer-ingelheim.com for any outstanding non-technical questions or issues.

[1] Boehringer will accommodate up to 2 unreplenished accumulated packages during the implementation phase. Covered entities shall have a 15-calendar day grace period, in which they may submit rebate requests for up to 2 unreplenished accumulated packages prior to the Pilot's effective date. The request for such rebates must still be made within 45 days of dispense.

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Part II: 340B Program Contract Pharmacy Policy
2026/2027 MFP products and non-MFP products

For MFP products in scope of the rebate model and non-MFP products, Boehringer continues to apply its 340B Program Contract Pharmacy Policy requirements. For a complete list of products included in Boehringer's 340B Program Contract Pharmacy Policy see Attachment C.

For all primary care products, Boehringer's contract pharmacy policy allows covered entities that do not have an in-house pharmacy capable of dispensing primary care 340B purchased products to its patients to designate a single contract pharmacy location to receive and dispense product purchased at the 340B price. The designated contract pharmacy must be registered on the HRSA OPAIS database as a contract pharmacy, located within a forty (40) mile radius of the covered entity parent site, and cannot be a central fill pharmacy.

For limited distribution drug OFEV®, Boehringer's contract pharmacy policy allows covered entities that do not have an in-house pharmacy capable of dispensing specialty products to designate one (1) specialty pharmacy from within Boehringer's limited distribution network or a wholly owned contract pharmacy for the sole purpose of receiving and dispensing OFEV at the 340B price to its patients.

Boehringer is utilizing Second Sight Solutions' 340B ESP™ platform to support contract pharmacy designations. 340B ESP™ is available free of charge and covered entities should visit www.340besp.com to register their account. Covered entities may email direct inquiries related to the use of 340B ESP™ to support@340besp.com.

For 340B Program Contract Pharmacy Policy state specific requirements, mailto: please reach out to support@340besp.com.

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Part III: 340B Program Claims Collection Policy
Non-MFP products

For non-MFP products, Boehringer requires all covered entity types to submit non-MFP claims data for all 340B dispenses, including in-house and contract pharmacy dispenses. Covered entities are required to submit pharmacy and medical claims data on 340B utilization filled at in-house pharmacies and submit pharmacy claims data on 340B utilization filled at contract. For a complete list of non-MFP products included in Boehringer's 340B Program Claims Collection Policy see Attachment C

Covered entities that fail to provide timely, complete, and accurate data for products dispensed at the 340B price may lose access to 340B pricing until the required data is provided. All specified claims data, for non-MFP claims, must be submitted on the **340B ESP™ platform** (www.340besp.com) within 45 days of dispense for continued access to 340B pricing.

For 340B Program Claims Collection Policy state specific requirements, please reach out to support@340besp.com.

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Frequently Asked Questions
340B Rebate Model Pilot Program

Q. What types of covered entities are included in Boehringer's 340B Rebate Model Policy?
A. All 340B covered entities (hospital and federal grantee) are subject to Boehringer's Policy.

Q: What Boehringer products are included in Boehringer's 340B Rebate Model Policy? How can we purchase products not included in the policy?
A: All MFP products in Attachment A are included in Boehringer's 340B Rebate Model Policy. There are no changes to 340B purchases for products not included in the Rebate Model Policy.

Q. Will I continue to have access to 340B pricing on Boehringer's MFP products through my wholesaler?
A. Covered entities will purchase MFP products listed in Attachment A at the commercial price (WAC") through their 340B wholesaler account and then receive a rebate on the purchase once 340B claims data have been completely submitted and validated by Beacon.

Q. What data elements are required to be submitted for a rebate request?
A. Details on the specific data elements required for the rebate model claim submission is available in Attachment B. The Beacon platform will only use the data required in Attachment B to effectuate the rebate.

Q. Does Boehringer Ingelheim's rebate model policy apply to all 340B utilization or just contract pharmacies?
A. Boehringer's rebate model policy applies to all 340B MFP product utilization at all covered entities including utilization at an entity's contract pharmacies, in-house retail pharmacies, as well as utilization administered to eligible 340B patients in an outpatient setting.

Q. Does Boehringer Ingelheim's 340B contract pharmacy policy still apply to MFP products included in Boehringer's 340B Rebate Model Policy?
A. Yes, Boehringer's 340B program contract pharmacy policy still applies to MFP products included in Boehringer's 340B Rebate Model Policy. Boehringer's 340B Program Claims Collection policy does not. Any covered entity that does not have an in-house pharmacy capable of dispensing primary care 340B purchased products to its eligible patients may designate a single contract pharmacy (inclusive of a wholly owned contract pharmacy) within 40 miles of the parent site, and it cannot be a central fill pharmacy. Any covered entity that does not have an in-house pharmacy capable of dispensing specialty care products to eligible patients may designate a single specialty pharmacy from within Boehringer's limited distribution network or a wholly owned contract pharmacy for the sole purpose of receiving and dispensing OFEV. 340B pricing for the designated contract pharmacy will be effectuated through the rebate process and covered entities should utilize 340B ESP to make eligible contract pharmacy designations. For a complete list of MFP products see Attachment A.

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Q. How will virtual inventory be supported at in-house and contract pharmacies?
A. In a 340B rebate process, virtual inventory is no longer necessary for a covered entity to manage its 340B program. Covered entities may continue to utilize third-party administrators ("TPAs") to qualify product dispenses or administrations as 340B eligible. Covered entities will then submit qualified claims to Beacon, and 340B rebates will be made directly to the covered entity once validated claims have been submitted to support a 340B rebate for a purchase. Covered entities are encouraged to clear all existing 340B accumulations and replenish eligible claims prior to January 1, 2027.

Q. How frequently can I upload claims data submitted to Beacon?
A. Covered entities can submit 340B claims data to Beacon as soon as they are qualified as 340B eligible by the covered entity or its TPA. There is no limitation on how frequently claims data may be submitted to Beacon. Rebates can only be paid following the complete submission and validation of 340B claims data to Beacon. Covered entities are encouraged to submit the claims data in a timely manner.

Q. How are claim reversals submitted and processed in Beacon?
A. Submission of a claim to Beacon is a request for payment of a 340B rebate and covered entities should only submit final claims. If a previously submitted and validated claim must be reversed, covered entities should submit the same claim detail with a negative unit amount. If the 340B rebate has already been paid, a future 340B claim submission will be offset by the reversed claim.

Q. Can I dispute a claim submission that is not validated in Beacon?
A. Certain aspects of the 340B eligibility and claims validation processes can be disputed by a covered entity. Disputes are initiated in Beacon and may require the submission of additional documentation. Covered entities may also contact Beacon **support@beaconchannelmanagement.com**. Boehringer will work in good faith with covered entities to address extenuating circumstances raised during the dispute process.

Q. How will rebates be calculated for claim submissions that are not at the full NDC package size?
A. The rebate amount is determined by the difference between the commercial price ("WAC") and the 340B ceiling price at the time of dispense. If a covered entity submits claims data for dispensed or administered 340B product that is less than the full NDC package size, the rebate will be prorated based on the number of 340B claims submitted.

Q. Can I correct previously submitted 340B claims?
A. Covered entities may resubmit 340B claims with corrected data if the 340B claim is not initially validated in Beacon so long as the covered entity is submitting accurate information. Covered entities can also engage in good faith resolution by contacting the Beacon Support Team via chat, email or phone. Submission of additional documentation may be necessary to resolve a good faith inquiry.

Q. How is the 340B rebate amount calculated for a 340B claim submission?
A. The commercial price ("WAC") and 340B prices are established based on the dispense date of the product. For example, if a product is purchased on June 5, 2027, and the product is dispensed on July 10, 2027, the commercial and 340B prices will be based on the July 10th dispense date.

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Q: My entity purchased 340B MFP products prior to January 1, 2027, but the product was not dispensed until after January 1, 2027. Will we be able to receive a 340B rebate?
A: No, claims for 340B MFP products purchased prior to January 1, 2027, and dispensed on or after January 1, 2027, are not eligible for a 340B rebate as the 340B price was given upfront for that purchase.[2]

Q. How long does it take for a 340B rebate payment to be processed and paid?
A. 340B rebates will be processed and paid within 10 calendar days from the date of complete claims submission and validation.

Q. What information is required to register an account with Beacon?
A. Covered entities can register an account with Beacon free of charge. A registering user must first establish affiliation with the covered entity by providing an EIN, IRS letter (CP575) with the entity address, a current W-9 form and Articles of Incorporation for the covered entity. This information is validated by a third party adhering to Know Your Business standards. Following successful enrollment of a covered entity, the registering user or another user established as an Administrator on the enrollment will need to request and submit a Bank Letter from its US financial institution with bank account information for ACH payments. The ACH information must be successfully verified as associated with the covered entity prior to any 340B rebates.

Q. How does Beacon handle protected health information (PHI)?
A. Data elements protected under HIPAA are de-identified through a HIPAA compliant hashing process known as SHA-3 hashing. An additional layer of security called a "salt" is applied prior to the hashing process and before any data is uploaded to Beacon. This process was granted an Expert Determination and meets the definition of a De-Identified Data Set under HIPAA. This means that Beacon does not collect or maintain identifiable PHI.

Q What data security protections are in place for the rebate model?
A. Beacon employs protections in line with industry's best practices. Please refer to www.cm.beaconchannelmanagement.com and click on "Trust Center" for more information.

Q. How does Beacon secure financial information provided as part of the registration process?
A. Beacon supports a multi-layer security protocol that is consistent with security practices commonplace with financial technology services in the marketplace today. Visit Beacon's Trust Center available online to learn more about the security protocols in place today.

Q: When does my entity begin submitting my claims data on Beacon for my 340B rebate payment?
A: Covered entities must begin submitting claims data for MFP products in Attachment A for purchases on or after January 1, 2027. If a covered entity is currently submitting claims data for MFP products in Attachment A via ESP, the entity must stop submitting claims data on the ESP platform and begin to submit claims data via Beacon for purchases on or after January 1, 2027.

[2] Boehringer will accommodate up to 2 unreplenished accumulated packages during the implementation phase. Covered entities shall have a 15-calendar day grace period, in which they may submit rebate requests for up to 2 unreplenished accumulated packages prior to the Pilot's effective date. The request for such rebates must still be made within 45 days of dispense.

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Q: If my state is exempt from Boehringer's 340B program claims collection policy, does this mean we do not submit claims for MFP products pursuant to rebate model on Beacon?
A: No, all covered entities in all states must submit claims for validation of a rebate on the Beacon platform for MFP products in Attachment A.

Q. My entity utilizes both the Beacon Rebate Model and Beacon MFP platform. Where should I submit claims data for 340B rebate payments?
A. For the 340B Rebate Model Pilot Program, covered entity users must submit claims data for 340B rebates via the Beacon Rebate Model platform.

Q. How should cash or uninsured patients be characterized during claims submission?
A. Cash or uninsured patient status should be characterized under the RX BIN and RX PCN data fields submitted with pharmacy claims data. Those data fields include an option for specific values to indicate uninsured/cash claims. For RX PCN and Health Plan Name, for a cash patient, the covered entity would populate the fields with "CASH" for claim submission. For RX BIN, for a cash patient, the covered entity would populate the field with "999999" as this field only allows numeric digits.

Q. Will my entity need to pay to utilize the Beacon platform?
A. No, Beacon is made available **free of charge** and covered entities should visit **www.cm.beaconchannelmanagement.com** to register their account and learn about the 340B rebate payment process.

Q. Will information be available to reconcile my claims submissions with rebate payments?
A. Reconciliation reports will be made available through the Beacon.

Q. My entity has an outstanding question/issue and is unable to find a resolution through www.cm.beaconchannelmanagement.com, contacting support@beaconchannelmanagement.com, or calling 1-878-788-8907. Who may I contact to address this question/issue?
A. For any outstanding non-technical questions or issues, please contact Boehringer at 340brebatemodel.rdg@boehringer-ingelheim.com.

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Q. How will my covered entity submit unreplenished accumulations that occurred prior to the implementation date of the approved Rebate Model?
A. Subject to a limited grace period[3], covered entities may submit unreplenished accumulations up to 2 packages similar to the process used to submit any rebate claim; by submitting limited pharmacy claims and medical claims data elements to the Beacon platform. Additional information on the specific data elements required for the rebate model claim submission is available in Attachment B.

Q. How will concerns with diversion and Medicaid duplicate discounts be addressed in the Rebate Model?
A. Rebate payments will not be denied based on concerns with diversion or Medicaid duplicate discounts. Boehringer will take other actions related to diversion and Medicaid duplication such as good faith inquiries, audits, the administrative dispute resolution process and / or raising concerns with HRSA.

[3] Boehringer will accommodate up to 2 unreplenished accumulated packages during the implementation phase. Covered entities shall have a 15-calendar day grace period, in which they may submit rebate requests for up to 2 unreplenished accumulated packages prior to the Pilot's effective date. The request for such rebates must still be made within 45 days of dispense.

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Frequently Asked Questions
340B Program Contract Pharmacy Policy for MFP products and non-MFP products

Q: Which products are subject to Boehringer's contract pharmacy policy?
A: Boehringer's contract pharmacy policy applies to all products listed on Attachment C.

Q: What covered entity types are included in Boehringer's policy?
A: All 340B covered entity types are subject to Boehringer's 340B contract pharmacy policy.

Q: Does the 340B Program contract pharmacy policy still apply to MFP and non-MFP products?
A: Yes, Boehringer's 340B Program contract pharmacy policy continues to apply to MFP and non-MFP products. Boehringer is utilizing Second Sight Solutions' 340B ESP™ platform to support contract pharmacy designations. 340B ESP™ is available free of charge and covered entities should visit www.340besp.com to register their account. Covered entities may email direct inquiries related to the use of 340B ESP™ to support@340besp.com.

Q: What is an in-house (entity-owned') pharmacy?
A: An in-house ('entity-owned') pharmacy is a pharmacy that is owned by the 340B covered entity and listed in HRSA OPAIS (Welcome to 340B OPAIS) as "Street Address" and "Shipping Addresses." If Boehringer identifies that a covered entity is shipping 340B priced product to a street address or shipping address(es) location for the covered entity as listed in HRSA OPAIS and to a contract pharmacy location(s), Boehringer will notify the covered entity in these instances. Covered entities may continue to access the 340B price at the locations listed on HRSA OPAIS as registered street address or shipping address(es).

Q: My covered entity has an in-house pharmacy that is capable of dispensing Boehringer's primary care products but does not have the capability to dispense OFEV. Can my entity designate a contract pharmacy that is approved to purchase and dispense OFEV?
A: Any covered entity that does not have an in-house pharmacy capable of dispensing specialty products may also designate one (1) specialty pharmacy from within Boehringer's limited distribution network for the sole purpose of receiving and dispensing OFEV at the 340B price to its patients provide the covered entity submits limited claims data for that specialty pharmacy location. A wholly owned pharmacy may instead be designated as a single contract pharmacy location to receive and dispense OFEV purchased at the 340B price provide the covered entity submits limited claims data for that specialty pharmacy location and it meets the contract pharmacy requirements as registered on the HRSA OPAIS database as a contract pharmacy and is not a central fill pharmacy.

Q: My covered entity has a contract pharmacy relationship with a pharmacy that is owned by our health system ("wholly owned pharmacy"). Is this pharmacy subject to Boehringer's policy?
A: Yes, contract pharmacies that are wholly owned by the covered entity are subject to Boehringer's policy. A wholly owned pharmacy may be designated as the single contract pharmacy location provided it meets the contract pharmacy requirements as registered on the HRSA OPAIS database as a contract pharmacy of the entity, is located within a forty (40) mile radius of the covered entity parent site, is not a central fill pharmacy, and the covered entity submits limited claims data for that contract pharmacy location.

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Q: Does the pharmacy's location that I would like to designate as my contract pharmacy designation need to be within a forty (40) mile radius of my covered entity's parent location?
A: Yes, under Boehringer's policy, except for OFEV, the single contract pharmacy designation that a covered entity has chosen to distribute Boehringer products must be within a forty (40) mile radius of the covered entity's parent location.

Q: My covered entity has contract pharmacy arrangements with multiple locations of the same pharmacy (e.g. six different pharmacy locations). Can my entity designate all locations of the same pharmacy?
A: No, Boehringer's policy allows covered entities to designate only a single contract pharmacy location within forty (40) miles of the covered entity. Contract pharmacy locations are registered individually on the HRSA database, and covered entities are permitted to designate only a single contract pharmacy location which corresponds to a single contract pharmacy registration with HRSA.

Q: Does Boehringer permit 340B replenishment purchases to be shipped to, or aggregated through, a different contract pharmacy location than the pharmacy where the 340B product was dispensed, including the use of a single designated contract pharmacy to collectively replenish dispensing activity from other contract pharmacy locations?
A: No. Under Boehringer's policy, 340B products must be shipped directly to the same designated contract pharmacy location where the 340B product was dispensed to an eligible patient. Boehringer does not permit replenishment purchases to be shipped to a different pharmacy location or the use of a single designated contract pharmacy to aggregate or collectively replenish dispensing activity from other non-designated contract pharmacy locations. Any replenishment model must maintain a direct relationship between the dispensing pharmacy location and the replenishment shipment destination.

Q: Is Boehringer requiring covered entities to have a HIN registered for the contract pharmacy that they designate?
A: Yes, a contract pharmacy must have a HIN assigned to it for a covered entity to designate it as its single contract pharmacy. This information is important for Boehringer to manage its process with its wholesalers. Boehringer will not register a HIN on your behalf, however, if you need guidance or more information on how to get a HIN assigned to your contract pharmacy, please reach out to support@340besp.com. If you try to designate a contract pharmacy without a HIN in 340B ESP™, the system will notify you of this requirement and provide instructions for how to obtain a HIN.

Q. How long does it take for my contract pharmacy designation to take effect?
A: If your covered entity wishes to designate a contract pharmacy, please allow up to ten (10) business days for the designation to take effect.

Q: How often can my covered entity change its contract pharmacy designation?
A: Covered entities can elect a single contract pharmacy every twelve (12) months from the date of designation or more often if the designated contract pharmacy relationship is terminated from HRSA OPAIS database. Changes to the single contract pharmacy designation can only be made by visiting www.340besp.com/designations. Users that have registered an account with 340B ESP™ can navigate to the Entity Profile tab to make their contract pharmacy designation.

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Frequently Asked Questions
340B Program Claims Collection Policy for Non-MFP products

Q: What Boehringer products are utilizing Second Sight Solutions' 340B ESP™ platform for the submission of 340B contract pharmacy and in-house pharmacy and medical claims data?
A: All non-MFP products in Attachment C will be utilizing 340B ESP™ for all covered entity types to submit claims data for all 340B dispenses including in-house and contract pharmacy dispenses.

Q: What are the requirements for submission of 340B claims data?
A: Boehringer is utilizing Second Sight Solutions' 340B ESP™ platform (www.340besp.com) to support claims collection on behalf of all covered entity types. Claims data must be submitted within forty-five (45) days of the date of dispense for the pharmacy to continue to access 340B pricing for all Boehringer products in Attachment C. Please see 340B ESP™ for additional details on submitting claims data, including the limited set of required data fields.

Q: What covered entity types are included in Boehringer's claims collection policy?
A: All 340B covered entity types are subject to Boehringer's 340B claims collection policy.

Q: Does Boehringer's 340B Claims Collection Policy apply to covered entities in all states?
A: Boehringer's 340B Claims Collection Policy applies to covered entities in states where applicable by state law. Existing state carve-out exemptions that apply to Boehringer 340B Program Claims Collection Policy are unaffected by this notice and will also apply to Boehringer's Claims Collection Policy. For any future state changes, entities in affected states will be notified through separate communications, for specific state requirements.

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Attachment A

In Scope NDCs and Products for the 340B Rebate Model Pilot Program

NDC	Product	Strength	Pkg Size
00597-0152-30	JARDIANCE	10 mg	30
00597-0152-37	JARDIANCE	10 mg	30
00597-0152-90	JARDIANCE	10 mg	90
00597-0153-30	JARDIANCE	25 mg	30
00597-0153-37	JARDIANCE	25 mg	30
00597-0153-90	JARDIANCE	25 mg	90
00597-0140-61	TRADJENTA	5 mg	100
00597-0140-30	TRADJENTA	5 mg	30
00597-0140-90	TRADJENTA	5 mg	30
00597-0143-60	OFEV	100 mg	60
00597-0145-60	OFEV	150 mg	60

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Attachment B

340B Rebate Model Pharmacy and Medical Claims Data Elements

The tables below list the specific data elements collected as part of the 340B rebate model pharmacy and medical claims submissions. Submission template files with details on data validations are available in the Support Center at www.cm.beaconchannelmanagement.com.

*Rebate claims will not be denied for failing to submit data fields labeled optional.

Pharmacy Claim Data Elements

Field Name	Description	Data Type
Date Of Service	Date on which the pharmacy filled the prescription.	Date
Date Prescribed	Date the healthcare provider wrote the prescription.	Date
Rx Number	The native (unmodified) prescription number for the prescription as generated by the pharmacy.	Numeric
Fill Number	Indicates the number of times the prescription has been filled as of the current fill. For example, a value of "0" indicates that the prescription has not been filled previously and the current fill is the first one. The first refill would have a value of "1".	Numeric (0-99)
NDC-11	The 11-digit National Drug Code which indicates the manufacturer, product, and commercial package size.	Numeric (11 Digits)
Quantity	Number of units dispensed to the patient. Appropriate Units of Measure for each product will be provided within Beacon's NDC list.	Numeric
Prescriber ID	National provider identifier (NPI) of the healthcare provider that wrote the prescription.	Numeric (10 Digits)
Service Provider ID	NPI of the pharmacy that filled the prescription	Numeric (10 Digits)
340B ID	HRSA assigned identifier of the 340B covered entity that designated the dispense as 340B.	Alpha/Numeric
BIN Number	Prescription Drug Bank Identification Number for the primary payer. Enables pharmacies to electronically transmit data to the appropriate PBM for processing and reimbursement. If a patient is uninsured or a cash payer, mark "999999" in this field.	Numeric (6 Digits)
PCN Number	Processor Control Number for the primary payer. Identifier used to determine which processor will handle a prescription drug claim. If a patient is uninsured or a cash payer, mark "CASH" in this field. If there is no PCN, mark "NONE" in this field.	Alpha/Numeric

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Attachment B (continued)

Medical Claim Data Elements

Field Name	Description	Data Type
Health Plan Name	Name of the patient's primary health insurance plan. If the patient is uninsured or a cash payer, mark "CASH" in this field. If no health plan information is recorded, mark "NONE" in this field.	Alpha/Numeric
Health Plan ID	The identifier code of the patient's primary health insurance plan. If the patient is uninsured or a cash payer, mark "CASH" in this field. If no health plan information is recorded, mark "NONE" in this field.	Alpha/Numeric
Health Plan ID Qualifier	The qualifier for the patient's health insurance plan ID.	Alpha/Numeric
Service Provider ID	The NPI of the healthcare entity where the patient received the medication administration. For example, this could be the NPI of a hospital outpatient surgery center or the NPI of an outpatient infusion center.	Numeric (10 Digits)
NDC-11	The 11-digit National Drug Code which indicates the manufacturer, product, and commercial package size.	Numeric (11 Digits)
Quantity	The quantity of medication administered to the patient. Quantity must reflect standardized billing units as defined by NCPDP for the NDC-11.	Numeric
Unit of Measure	UOM must be consistent with the standardized billing unit as defined by NCPDP for the NDC-11.	Alpha/Numeric
Date of Service	Date on which the medication was administered to the patient.	Date
Physician ID	The NPI of the healthcare provider who rendered or supervised the care reported on the claim.	Numeric (10 Digits)
Claim Number	A unique identifier for a prescription and claim processor. This value should align with the Patient Control Number or Claim Submission ID, as set within provider systems and included on EDI 837 transmissions to payers (Form 1500 Box 26 or Claim 1450 Box 3).	Alpha/Numeric
Claim Line Number	Identifies an individual line number on a claim. Line numbers distinguish services that are submitted on the same claim. Wastage Claims or undispensed units submitted should include a separate claim line number from the dispensed units.	Numeric
340B ID	HRSA assigned identifier of the 340B covered entity that designated the administration as 340B.	Alpha/Numeric

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Attachment C

In Scope Products for the 340B Program Contract Pharmacy Policy

The products listed below (both non-MFP and MFP) are included in Boehringer's 340B Program Contract Pharmacy Policy.

Non-MFP Products	MFP Products*	
Primary Care Portfolio	**Primary Care Portfolio**	**Specialty Portfolio Limited Distribution Network**
ADALIMUMAB-ADBM®	JARDIANCE®	OFEV®
APTIVUS®	TRADJENTA®	
ATROVENT®		
COMBIVENT®RESPIMAT®		
CYLTEZO®		
GLYXAMBI®		
JENTADUETO®		
JENTADUETO XR ®		
MICARDIS®		
MICARDIS HCT®		
PRADAXA®		
SPIRIVA® HandiHaler®		
SPIRIVA® RESPIMAT®		
STIOLTO® RESPIMAT®		
STRIVERDI® RESPIMAT®		
SYNJARDY®		
SYNJARDY XR®		
TRIJARDY XR®		
VIRAMUNE XR®		

MFP products in scope for Boehringer's 340B Rebate Model Pilot Program.