Update to Lilly's 340B Distribution Program for In-House Pharmacies
January 15, 2026

Since December 2021, Lilly has received claims-level data (CLD) from covered entities for dispenses made through contract pharmacies. This data, which covered entities have long compiled as part of the product replenishment process, provided Lilly for the first time with much needed transparency into the 340B program. Among other things, this basic claims data permitted us to identify countless instances of Medicaid duplicate discounts, instances where multiple covered entities sought replenishment on the same unit of 340B program, and to produce the evidence required by HRSA to initiate audits. In the intervening years, the claims-level data submission process has become standard business practice across the industry and has become an increasingly seamless part of the 340B purchasing system.

In order to help identify the full universe of duplicate discounts and other program abuses, preserve our ability to initiate audits, and expand transparency even further, effective for dispenses on or after February 1, 2026, Eli Lilly and Company (Lilly) will require covered entities to submit CLD for **all** 340B dispenses, including in-house pharmacy dispensing.

What's Changing? All covered entity types will be required to provide CLD for pharmacy dispenses and medical claims for Lilly's entire portfolio of products (labeler codes 00002, 00077, and 66733) to the 340B ESP™ platform within 45 days of product dispense, with the exception of the following products, which must be submitted within 60 days of product administration: Alimta, Amyvid, Cyramza, Erbitux, Kisunla, Omvoh, Portrazza, and Tauvid. Failure to provide timely, complete, and accurate data for all products dispensed at 340B ceiling prices may result in loss of access to pricing until such time as the outstanding data is provided.

Covered entities that do not currently submit data can do so by registering an account at www.340BESP.com and navigating to the Entity Profile tab. The 340B ESP platform is the only way a covered entity can submit CLD under Lilly's policy. Please complete the registration promptly to be ready to submit data within the above timelines for dispenses made on or after February 1, 2026.

What's Not Changing? Lilly's Contract Pharmacy Limited Distribution System, last updated and effective on July 1, 2024, is not changed or altered by this notice. Lilly will allow distribution of 340B ceiling-priced product directly to covered entities and their child sites only, with limited exceptions.

Lilly is committed to compliance with the 340B statute and to responsible distribution of its products. Lilly will continue to offer all covered entities its 340B medicines at or below the 340B ceiling price, consistent with the 340B statute, as long as the covered entity provides the minimal, standard business information outlined in this notice. Lilly will also continue to work with all stakeholders to improve program integrity and ensure that the 340B program can be properly and fairly administered going forward.

If you have any questions regarding this notice, please contact Lilly at 340B@lilly.com. Communications related to HRSA's 340B ADR process should be directed to 340B_ADR_Support@lilly.com.

Frequently Asked Questions

To get started with Second Sight Solutions' 340B ESP™ platform, follow these simple steps:

1. Go to www.340BESP.com to register your account. Upon initial registration you will be prompted with an onboarding tutorial that will walk you through the account set up process step by step. This process takes about 15 minutes.

2. Once your account is activated, you will be able to securely upload data to 340B ESP™. You will receive periodic notifications of pending data submissions. Once your account is set up, the claims upload process takes about 5 minutes.

In addition to the frequently asked questions below, you can visit www.340BESP.com/FAQs to learn more about 340B ESP™. For further help with the registration, account setup, and data submission process, please call Second Sight Solutions at 888-398-5520.

Q1: Which products are subject to Lilly's 340B Distribution Program?

A1: Lilly's 340B program applies to all products (Labeler codes 00002, 00777, 66733). This program also applies to all 340B-priced product utilization, inclusive of pharmacy and medical benefit dispenses.

Q2: If my covered entity is currently submitting data to 340 ESP, do I need to take any action?

A2: If your covered entity has access to both in-house and contract pharmacies (due to the insulin exception or otherwise) and is only submitting CLD for the contract pharmacy dispenses, please contact 340B ESP to begin the claims submission process for in-house dispenses. If your covered entity is one of the many currently submitting CLD for all in-house pharmacy dispenses, no action is required at this time. All covered entities must submit all dispenses occurring on or after February 1, 2026 in order to maintain access to 340B pricing.

Q3: How will Lilly use the 340B claims data that we provide through 340B ESP™?

A3: Data uploaded by 340B covered entities will be used to monitor for and avoid duplicate discounts and to ensure the eligibility of certain replenishment orders.

Q4: My covered entity dispenses exclusively through in-house dispensing and does not use contract pharmacies. Am I impacted by this notice?

A4: Yes. Beginning with dispenses on or after February 1, 2026, in-house dispensing claims data is required to be submitted in order to maintain access to Lilly products at 340B ceiling prices. Contact www.340BESP.com to register and set up the claims submission process, if not currently submitting data.

Q5: Does this notice apply to covered entities in every state?

A5: Covered entities located in Colorado, Maine, Nebraska, North Dakota, Oregon, Rhode Island, South Dakota, Tennessee, Vermont or West Virginia, are exempted from the CLD requirement and no action is required at this time. Federally Qualified Health Centers (FQHC) or FQHC "look-alikes" located in New Mexico are also exempted from the CLD requirement and no action is required from these covered entities at this time. Lilly reserves the right to change the criteria or list of exemptions at any time in its sole discretion.

Q6: My covered entity utilizes a central-fill pharmacy. Will the central-fill pharmacy be deemed an eligible contract pharmacy when it is utilized to acquire or distribute covered outpatient drugs to a 340B eligible contract pharmacy?

A6: As stated in Lilly's Contract Pharmacy Limited Distribution System, last updated and effective on July 1, 2024, centralized pharmacy replenishment facilities or "central-fill pharmacies" are not eligible as designated retail pharmacy locations. Lilly will only facilitate shipment or replenishment to the contract pharmacy for product dispensed directly by that contract pharmacy at their own physical location.

Q7: Where do I direct communications related to Lilly's 340B program?

A7: Communications related to Lilly's 340B policies should be sent to 340B@lilly.com. Communications related to HRSA's 340B ADR process should be sent to 340B_ADR_Support@lilly.com.