

March 18, 2026

Chantelle Britton
Director, Office of Pharmacy Affairs
Health Resources and Services Administration
5600 Fishers Lane
Rockville, MD 20857

Subject: Request for Information: 340B Rebate Model Pilot Program, HHS Docket No. HRSA-2026-03042

Dear Director Britton,

As president and CEO of [MANA](#), A National Latina Organization that's committed to advancing health equity for Latinas and their families, I am grateful for the opportunity to [comment](#) on HRSA's Request for Information regarding a potential "340B Rebate Model Pilot Program."

Congress created the 340B program to enable safety-net providers to better care for vulnerable patients -- including the medically underserved Latino communities we advocate for. Despite that worthy goal, the 340B program currently lacks transparency. As a result, it's impossible to determine whether, and to what extent, resources are reaching the patients who need them most.

That's why MANA strongly supports any renewed efforts to implement a rebate-based pilot program. As we explained in our comment letter regarding the original, now-withdrawn pilot, moving from upfront discounts to a claims-based rebate structure would improve transparency and help address long-standing concerns regarding diversion and duplicate discounts.

The 340B program has grown exponentially, from approximately [90 qualifying hospitals](#) at its inception to [more than 2,600 today](#). The increase in scale and complexity has made oversight more challenging. A rebate model would provide a stronger accountability framework while maintaining the program's core promise.

Latinas experience [higher rates](#) of being uninsured, are more likely to serve as [caregivers in multigenerational households](#), and suffer [disproportionately from](#) diseases such as obesity, diabetes, and chronic kidney disease. These are precisely the types of conditions that require consistent access to prescription therapies, and any consideration of a rebate model should be evaluated in light of whether it promotes access to these therapies.

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HRSA's previous rebate pilot applied only to the first 10 drugs selected for Medicare price negotiation. In the current revised pilot, we are pleased to see that HRSA included both the I-Pay 2026 and I-Pay 2027 drugs, bringing the total number of drugs in the pilot to 25.

Including these additional drugs will allow HRSA to generate more reliable and representative data and transparency to better evaluate the rebate model across more therapies that treat chronic conditions disproportionately affecting Latino communities.

If any rebate pilot proves successful in reducing waste and duplicate discounts -- as we believe it will -- HRSA ought to require that manufacturers provide 340B pricing on *all* drugs via these rebates, rather than upfront discounts.

We also urge HRSA to not exempt particular covered entities from any new pilot. If certain covered entities are exempted, HRSA will be unable to determine whether observed outcomes reflect the rebate model itself or differences in participation. A full and consistent application of the rebate structure is essential to producing meaningful results.

Of course, HRSA can and should offer additional administrative support, such as technical training and assistance, to federally qualified health centers and other smaller covered entities.

MANA also encourages HRSA to establish clear evaluation criteria and publicly report findings at regular intervals. Claims-level reporting should capture patient coverage status, site of care, and geographic indicators such as ZIP code or county. These data points will allow HRSA to assess whether savings are truly reaching medically underserved communities and improving access for patients who face the greatest barriers to care.

A new rebate pilot program could strengthen the integrity of the 340B program while serving the Latina community. MANA commends HRSA for renewing this effort and respectfully encourages the agency to include I-Pay 2026 and I-Pay 2027 drugs, require uniform participation without carve-outs, and implement robust evaluation and reporting standards.

Sincerely,



Amy L. Hinojosa

President and CEO

MANA, A National Latina Organization