

340B Study Report Update

Monday, March 23, 2026

PDAB Staff



MARYLAND
Prescription Drug Affordability Board

Agenda

- Background
- 2024 HB 1056
- Data Request
- Overview Organization of the Report
 - Federal Updates
 - Maryland 340B Program



Background

- The 340B Drug Pricing Program is a federal program that requires drug manufacturers to provide certain covered entities with significant discounts on outpatient drugs for eligible patients
- Covered entities include disproportionate share hospitals, critical access hospitals, Ryan White clinics, and other health centers



2024 HB 1056- State Board of Pharmacy – Prohibition on Discrimination Against 340B Drug Distribution

- Prohibits 340B manufacturers from limiting or restricting acquisition or delivery of 340B drug
- The Maryland PDAB shall submit a report by July 1, 2026 on:
 - the current implementation and scope of the 340B Program in the State;
 - the implementation and impact of the implementation of Section 1 of this Act; and
 - the finances of the Program in the State, including how covered entities reinvest savings realized from the Program
- PDAB may require covered entities and 340B manufacturers to report information as necessary to complete the 340B study



Data Request

- PDAB staff sent out and posted a 340B Data Request on March 11, 2026
 - Responses are due on April 10, 2026
- Data elements include but are not limited to the following:
 - Annual 340B reimbursement, expenses, spread, and savings
 - Annual volume (annual, in-house, physician-administered)
 - Information on unique accounts to track 340B finances
- 340B covered entities in Maryland were directly contacted, but any 340B covered entity in Maryland or manufacturer can submit data



Data Request

- PDAB intends to analyze the data and present findings in the 340B report
- Analyses may include aggregate totals, ranges, averages, and trends
- This data collection is only authorized for the purpose of this 340B study and associated report



Overview/Organization of the Report

- Current implementation and scope of the 340B Program
 - Federal
 - State
- Updates and Current Issues in 340B
 - Federal
 - State
- Implementation and impact of the implementation of 2024 HB 1056; and
- Finances of the Program in the State, including how covered entities reinvest savings realized from the Program



Federal Updates

- The 340B Program continues to grow at a significant rate
- 340B purchases reached \$81.4 billion in 2024, up 23% from 2023
- The Federal government announced a rebate pilot program that was supposed to go into effect that was subsequently vacated
 - Federal work on rebate models continues
- Ongoing litigation surrounding contract pharmacies, definitions, and HRSA regulatory authority, among other themes
- Implementation of the Inflation Reduction Act will affect 340B



Maryland 340B Program

- Maryland's 340B experience has been unique due to its global budget model
 - Covered entities do not have as much discretion to generate and spend 340B spread compared to those in other states
- Maryland is often excluded from federal trends and 340B spending research
- The Data Request will help illuminate trends for Maryland





MARYLAND

Prescription Drug Affordability Board

comments.pdab@maryland.gov

pdab.maryland.gov