

February 19, 2026

The Honorable Thomas J. Engels
Administrator
Health Resources and Services Administration
U.S. Department of Health and Human Services
5600 Fishers Lane
Rockville, MD 20852

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

Dear Administrator Engels,

We, the undersigned associations, collectively represent the more than 2,000 hospitals that participate in the 340B Drug Pricing Program. On behalf of those members, we provide this initial comment on the Health Resources and Services Administration's (HRSA) request for information regarding a 340B Rebate Model Pilot Program.

Our associations and members appreciate the opportunity to comment on whether HRSA should implement a rebate model and how to best design a rebate framework if the agency chooses to pursue one. We also appreciate the broad list of topics on which HRSA seeks comment. Unfortunately, however, the 30-day comment period does not afford stakeholders sufficient time to gather information and provide complete answers to those dozens of detailed questions. In fact, it will be almost impossible for 340B hospitals to comprehensively gather the "facts, research, and evidence" that HRSA has asked stakeholders to provide in their comments.

We therefore respectfully ask the agency to extend the timeline for stakeholder comments until April 20, 2026. In general, this timeline would better allow stakeholders, including the 340B hospital field, to provide the agency with meaningful feedback. As HRSA has previously recognized, a rebate mechanism would upend more than 30 years of practice using an upfront discount mechanism. This modest extension is necessary to fulfill the agency's own stated goal of ensuring "a fair and transparent comment process for all stakeholders." Indeed, without an extension, we have serious concerns whether the agency will be able to consider all aspects of the problem.

We sincerely appreciate the agency's consideration of our request and look forward to working with HRSA to protecting the 340B program and the millions of patients who benefit from it.

Sincerely,

America's Essential Hospitals
American Hospital Association
American Society of Health-System Pharmacists
Association of American Medical Colleges
Catholic Health Association of the United States
Children's Hospital Association
340B Health