



October 25, 2024

Subject: UCB 340B Contract Pharmacy Policy Update

Dear 340B Covered Entity,

I am writing to inform you UCB is modifying its policy regarding the provision of drugs at the 340B price, effective November 25, 2024.

Under UCB's current 340B contract pharmacy policy and the modified policy described below, UCB will continue to ship products purchased at the 340B discounted price to locations registered as a 340B covered entity or its child site location. To ensure all 340B covered entities have access to products purchased at the 340B price, a 340B covered entity that does not have an in-house pharmacy will continue to be allowed to designate a single contract pharmacy location to receive products purchased at the 340B price.

Please note, the following contract pharmacy policy modifications will become effective November 25, 2024:

- ***Adding claims data requirement to hospital covered entities.*** Under UCB's modified policy, a covered entity without an in-house pharmacy is allowed to designate a single contract pharmacy location to receive 340B-priced drugs only when the following conditions are satisfied: 1) the covered entity submits claims data to substantiate the purchase, and 2) the designated contract pharmacy is located within 40 miles of the covered entity parent site. (A covered entity with an in-house pharmacy is not eligible to designate a contract pharmacy.)
- ***Applying policy to federal grantees.*** Under UCB's modified policy, federal grantees will be subject to the same policy requirements outlined above for hospital entities, except that a federal grantee without an in-house pharmacy is not required to submit claims data to designate a contract pharmacy. (A federal grantee with an in-house pharmacy is not eligible to designate a contract pharmacy.)

UCB will continue to utilize the 340B ESP™ platform to support designation of a contract pharmacy for covered entities that do not have an in-house pharmacy. If the covered entity has not already registered an account with 340B ESP™, please enter your designation by visiting [www.340besp.com/designations](http://www.340besp.com/designations). Users that have registered an account with 340B ESP™ can designate a single contract pharmacy by navigating to the Entity Profile tab. If you have questions regarding the change in our 340B distribution model, please contact us at [340B@ucb.com](mailto:340B@ucb.com).



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In support of a smooth transition to our modified policy, 340B covered entities should work with their contract pharmacy administrators and wholesalers to process any outstanding replenishment orders in advance of the November 25, 2024 effective date. 340B contracts administered by our wholesalers will no longer support provision of drugs purchased at the 340B discounted price to contract pharmacies under UCB's prior policy after November 25, 2024.

Kind regards,

A handwritten signature in black ink, appearing to read 'Jay Janco', written over the printed name.

Jay Janco

Head of Contracts & Pricing



## Frequently Asked Questions

### **Q: Which products are subject to UCB's policy?**

A: A full list of products subject to UCB's modified policy can be found in the ATTACHMENT A below. This list may be updated from time to time to include newly introduced or other covered outpatient drugs. A covered entity may also access the complete list of NDCs by accessing [What NDCs do we look for? | 340B ESP - Help Center](#).

### **Q: My covered entity has a contract pharmacy relationship with a pharmacy that is owned by our health system. Is this pharmacy subject to UCB's policy?**

A: Under UCB's 340B contract pharmacy policy, contract pharmacies that are wholly owned by the covered entity or share common ownership with a health system can be designated as a covered entity's single contract pharmacy but will no longer be separately eligible to receive 340B pricing.

### **Q: I have an in-house pharmacy that is capable of purchasing and dispensing UCB drugs, but I don't use it to dispense UCB drugs. Can I designate one contract pharmacy instead?**

A: No, under UCB's policy, if a covered entity has an in-house pharmacy capable of purchasing and dispensing UCB drugs at the 340B price, the entity must use that pharmacy and cannot designate a separate contract pharmacy.

### **Q. How do I change my contract pharmacy designation?**

A. 340B covered entities that do not have an in-house pharmacy capable of dispensing medicines to their patients can elect a single contract pharmacy every twelve (12) months. Changes to the single contract pharmacy can be made only by visiting [www.340Besp.com/designations](http://www.340Besp.com/designations). Users that have registered an account with 340B ESP™ can navigate to the Entity Profile tab to make their single contract pharmacy designation.

### **Q. I already designated a single contract pharmacy for UCB. Do I need to re-designate on 340B ESP™?**

A. Covered entities that currently have a designation in place through 340B ESP™ do not need to re-designate but must begin submitting claims data to retain access to 340B pricing at their designated contract pharmacy. They can begin submitting claims for UCB by navigating to the Claims Data Submission tab.

### **Q. How often can I change my contract pharmacy designation?**

A. Covered entities that do not have an in-house pharmacy capable of dispensing medicines to its patients may change its single contract pharmacy designation once every twelve (12) months or more often if the designated contract pharmacy relationship is terminated from the HRSA OPAIS database.

### **Q. My 340B covered entity has contract pharmacy arrangements with multiple locations of the same pharmacy (e.g. six different Accredo® pharmacy locations). Can I designate all locations of the same pharmacy?**

A. UCB's policy allows 340B covered entities that do not have an in-house pharmacy, capable of dispensing medicines to its patients, to designate a single contract pharmacy location. Contract pharmacy locations are registered individually on the HRSA database and 340B covered entities are permitted to designate only one contract pharmacy location, which corresponds to a single contract pharmacy registration with HRSA.

### **Q. How do I ensure that my contract pharmacy designation takes effect on November 25, 2024?**



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A. For a covered entity's contract pharmacy designation to take effect on November 25, 2024, its contract pharmacy selection needs to be made by November 11, 2024. After November 11, 2024, please allow 10 business days for the designation to take effect.

**Q. How long does it take for my contract pharmacy designation to take effect if I make the designation after November 11, 2024?**

A. You can designate a contract pharmacy after UCB's policy goes into effect on November 25, 2024. If you designate after November 11, 2024, please allow 10 business days for the designation to take effect.

**Q. What if my 340B covered entity does not have a contract pharmacy within a 40-mile radius of my parent site?**

A. If your covered entity does not have a contract pharmacy registered with HRSA that is within a 40-mile radius of the parent site, please contact [support@340Besp.com](mailto:support@340Besp.com) to find an acceptable alternative pharmacy.



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## ATTACHMENT A

All of the following products are subject to the modified policy effective November 25, 2024

Bimzelx®  
Briviact®  
Cimzia®  
Fintepla®  
Keppra®  
Keppra XR®  
Nayzilam®  
Neupro®  
Rystiggo®  
Vimpat®  
Zilbrysq®

Fintepla®, Rystiggo®, and Zilbrysq® ordering is subject to a limited distribution network