

RetireSafe

Standing up for America's Seniors!

April 14, 2026

Thomas J. Engels
Administrator
Health Resources and Services Administration
5600 Fishers Lane
Rockville, MD 20857

Dear Mr. Engels,

Thank you for the opportunity to provide feedback to the Health Resources and Services Administration (HRSA), Department of Health and Human Services (HHS), on a potential 340B Rebate Model Pilot Program. On behalf of senior advocacy organization RetireSafe, I am writing today to support and encourage the implementation of a rebate program to ensure savings intended to help low-income patients are not pocketed by participating providers.

The 340B program was originally developed to help low-income patients access the medications they need in the face of high costs. The program allows participating hospitals and clinics to purchase drugs at discounted rates, and, in theory, offer reduced prices to patients in need. In practice, a lack of transparency and oversight has allowed some 340B hospitals to abuse the system, pocketing savings meant to help patients. Rather than utilizing federal resources to help the vulnerable, the 340B program has become a mechanism for hospitals to absorb funds.

340B and profit-motivated expansion have also driven up [Medicare Part B](#) premiums. General increases in health spending and government payments to hospitals have led Medicare to shift the cost burden onto beneficiaries through higher premiums. Tens of millions of seniors rely on Part B to afford provider-administered infusions and injections they require to treat a variety of conditions and maintain their quality of life. Abuse of the 340B program is now saddling these patients with higher costs and decreased access while participating entities profit.

The proposed rebate model is an important first step in bringing transparency and integrity to the historically opaque 340B program. Through this limited pilot, participating hospitals would be required to provide data showing that eligible prescriptions were dispensed to eligible patients. Once that data is submitted, manufacturers would be required to quickly pay the 340B rebates. By requiring a self-enforcing system for covered entities to provide proof of their 340B activities, the program has the potential to reduce opportunities for abuse and stop covered entities from fraudulently profiting off a program meant to help low-income patients. Not to mention, the federal government would be less involved with this program, ultimately saving taxpayers money. This is a win-win for seniors.

Thank you for your efforts to protect patients from abuse of the 340B program. I strongly urge you to implement a Rebate Model Pilot Program to ensure 340B works as intended and that patients in need, not participating hospitals, reap its benefits.

Sincerely,

Mark Gibbons
President/CEO
RetireSafe