



Spencer Fane Attorneys Discuss the 340B Rebate Model Pilot Program in Dual Publications

Spencer Fane attorneys [Beth Siemer](#) and [Aurora Kammerer](#) have been closely tracking the status of the 340B Rebate Model Pilot Program, from the initial stages with insights published by [Pharmacy Times](#) to the most recent updates and challenges published by [Law360](#).

In the *Law360* article, which originated as a firm [blog post](#), the team explains that the 340B Rebate Model Pilot Program has been paused due to concerns about an incomplete administrative record. They note that while this pause provides relief for 340B covered entities, significant questions remain about how the program or similar initiatives may be reworked in the future, as well as the ongoing challenges stakeholders may still face.

"... even without the added concerns from the 340B Rebate Model Pilot Program, covered entities are facing a financial shift in 340B revenues as the dispensing margins shrink for MFP products, pricing and pricing model changes ripple through the industry, and Medicaid enrollment and Affordable Care Act plan enrollment continue to adjust to legal and market changes," the team wrote.

Beth is a pragmatic health care attorney who advises individuals and organizations navigating complex state and federal laws that govern transactions, compliance, and reimbursement. Working with various providers, payers, benefit managers, and vendors in the health care space, she offers practical tools, actionable advice, and customized solutions.

Aurora provides legal services to clients ranging from large health systems and hospitals to specialty providers and solo physician practices. Her approach to collaborative client service centers on understanding the challenges providers face

related to ongoing changes in health care access, Medicare and Medicaid reimbursements, health information technology, and government fraud investigations.

Read the full article [here](#). Please note, a subscription may be required.