

December 5, 2025

The Honorable John Thune  
Majority Leader  
United States Senate  
Washington, DC 20510

The Honorable Chuck Schumer  
Minority Leader  
United States Senate  
Washington, DC 20510

The Honorable Mike Johnson  
Speaker of the House  
U.S. House of Representatives  
Washington, DC 20515

The Honorable Hakeem Jeffries  
Minority Leader  
U.S. House of Representatives  
Washington, DC 20515

Dear Majority Leader Thune, Minority Leader Schumer, Speaker Johnson, and  
Minority Leader Jeffries:

As organizations deeply committed to caring for rural and underserved communities, we urge you to take legislative action to pause implementation of the 340B Rebate Model Pilot Program, currently slated to go into effect January 1, 2026.

Safety net health care providers are facing a challenging environment, with certain issues becoming more pronounced this year. Workforce shortages, limitations in the Medicaid program, and uncertainty of federal funding came to a head due to the government shutdown. And for years, these providers have been navigating the private sector erosion of the 340B program itself, including discrimination by Pharmacy Benefit Managers and limitations on contract pharmacies that are critical to providing access to care in rural communities. But the rebate model might be the tipping point. Through its complete restructuring of the 340B program, the rebate model imposes enormous financial and administrative burden, especially for the smallest community-based providers.

We recognize the logistical challenge of ensuring that providers get the lower of the 340B price or the Maximum Fair Price (MFP) set by the Medicare program. However, numerous groups have presented alternative proposals to the Centers for Medicare and Medicaid Services and the Health Resources and Services Administration that allow for upfront pricing determinations that would obviate the need for a rebate structure. The Department of Health and Human Services has chosen avenues that shift the burden away from the manufacturers, who generate billions in profits annually, to safety net providers, who are facing negative margins and limited cash flow.

As Congress continues to examine the 340B program to ensure that it remains true to its mission of “stretching scarce federal resources as far as possible,” it should also direct the Administration to pause the implementation of the rebate model. 340B providers must be

guaranteed that their ability to provide care to vulnerable patient populations and communities is not hampered by an ill-considered and potentially devastating change in how 340B has worked in its over 30-year history. The alternative is to rush into a model that so negatively impacts those caring for underserved communities across our country every day.

In the coming weeks, please use the legislative tools at your disposal to pause the implementation of the 340B Rebate Model Pilot Program. Thank you for your consideration.

Sincerely,

National Organizations:

Advocates for Community Health  
AIDS United  
ASHP  
Health Care Center for the Homeless, Inc.  
Hemophilia Alliance  
HIV Medicine Association  
NASTAD  
National Alliance for HIV Education and Workforce Development  
National Association of Community Health Centers  
National Rural Health Association  
Positive Women's Network USA

State and Local Organizations:

**Alabama:**

Alabama Primary Health Care Association  
Five Horizons Health Services  
Thrive Alabama

**Alaska:**

Alaska Primary Care Association  
Northwest Regional Primary Care Association  
Bethel Family Clinic  
Iliuliuk Family and Health Services, Inc.  
Kodiak Community Health Center  
Seward Community Health Center  
Sunshine Community Health Center

**Arizona:**

Arizona Alliance for Community Health Centers  
Adelante Healthcare

Canyonlands Community Health Care  
Circle the City Pharmacy  
El Rio Health  
Marana Health  
Mariposa Community Health Center  
Mountain Park Health Center  
Neighborhood Outreach Access to Health  
Wesley Community & Health Centers  
Sun Life Health  
Sunset Health  
United Community Health Center  
Valle del Sol, Inc.

**California:**

CPCA Advocates  
Alameda Health Consortium  
Anderson Valley Health Center  
Camarena Health  
Health Alliance of Northern California  
North East Medical Services (NEMS)  
Open Door Community Health Centers  
San Francisco AIDS Foundation  
San Ysidro Health  
TrueCare

**Colorado:**

Colorado Community Health Network  
Axis Health System  
Clinica Family Health & Wellness  
Colorado Coalition for the Homeless  
Denver Health  
Elevated Community Health  
Inner City Health  
Mountain Family Health Centers  
Northwest Colorado Health  
Pueblo Community Health Center  
River Valley Family Health Center  
Salud Family Health  
Tepeyac Community Health Center  
UMC Pharmacy  
Uncompahgre Combined Clinics  
Valley-Wide Health Systems  
Vivent Health

**Connecticut:**

CHC/ACT

Community Health and Wellness Center of Greater Torrington, Inc.

Generations Family Health Center

Optimus Health Care, Inc.

**Delaware:**

Mid-Atlantic Association of Community Health Centers

**District of Colombia:**

DC Primary Care Association

**Florida:**

Florida Association of Community Health Centers

Community Health Centers of Pinellas dba Evara Health

Community Health of South Florida, Inc.

FoundCare, Inc.

MCR Health

North Florida Medical Centers, Inc.

Project Health, Inc. d/b/a Langley Health Services

Rural Health Care, Inc. d/b/a Aza Health

Treasure Coast Community Health

**Georgia:**

Georgia Primary Care Association

Curtis V. Cooper Primary Health Care, Inc

East Georgia Healthcare Center, Inc. - - Swainsboro, GA

Georgia Highlands Medical Services

Georgia Mountains Health Servies, Inc.

MedCura Health

Medical Associates Plus

Primary Healthcare Centers

The Family Health Centers of Georgia

**Idaho:**

Idaho Community Health Center Association

Northwest Regional Primary Care Association

Adams County Health Center, Inc.

Community Family Clinic and Pharmacy

Glenns Ferry Health Center dba Desert Sage Health Centers

Health West, Inc.

Heritage Health

Kaniksu Community Health

Terry Reilly Health Services  
Valley Family Health Care

**Illinois:**

The Project of the Quad Cities  
Michael Reese Care Program  
SIHF Healthcare  
Vivent Health

**Indiana:**

Indiana Primary Health Care Association

**Iowa:**

Iowa Primary Care Association

**Kansas:**

Community Care Network of Kansas  
AllWays Community Health Center  
AmberMed  
CareArc, Inc.  
Community Health Center of Southeast Kansas  
Heartland Medical Clinic, Inc.  
Hunter Health  
Salina Family Health Center  
Swope Health

**Kentucky:**

A Plus Family HealthCare  
Audubon Area Community Care Clinic  
Clover Fork Outpatient Medical Project Inc.  
Dayspring Health  
Fairview Community Health Center  
Health First Community Health Center  
Health Help, Inc. dba White House Clinics  
Kentucky Mountain Health Alliance, Inc.  
Lewis County Primary Care Center, Inc.  
Monticello Medical Associates, Inc.  
Mountain Comprehensive Health Corporation (MCHC)  
One Cross Medical Clinic  
Park Duvalle  
Primary Care Centers of Eastern Kentucky  
Shawnee Christian Health Center, Inc.  
Sterling Health Services Inc.  
Tri-Rivers Healthcare, PLLC

**Maine:**

Maine Primary Care Association  
Health Access Network  
Penobscot Community Health Care  
St. Croix Regional Family Health Center

**Maryland:**

Mid-Atlantic Association of Community Health Centers

**Massachusetts:**

Massachusetts League of Community Health Centers  
Lynn Community Health Center  
NeighborHealth

**Michigan:**

Michigan Primary Care Association  
Vivent Health

**Mississippi:**

Community Health Center Association of Mississippi  
Five Horizons Health Services

**Missouri:**

Four Rivers Community Health Center  
Swope Health  
Vivent Health

**Montana:**

Montana Primary Care Association  
Ag Worker Health & Services  
Alluvion Health  
Bullhook Community Health center  
Butte Silver Bow Primary Health Care Clinic, Inc.  
Community Health Care Center, Inc. dba Alluvion Pharmacy  
Glacier Community Health center  
Greater Valley Health Center  
Marias Healthcare Services Inc.  
Northwest Community Health center  
One Health  
Partnership Health center Pharmacy  
PureView Health Center  
Sapphire Community Health Center

**Nevada:**

North East Medical Services (NEMS)

**New Hampshire:**

Bi-State Primary Care Association

Amoskeag Health

Coos County Family Health Services

**New Mexico:**

New Mexico Primary Care Association

**New York:**

Community Health Care Association of New York State

Albany Damien Center

Alliance for Positive Change

Apicha Community Health Center

CEC Health Care

ConnexCare

Family Health Network of Central New York, Inc.

GMHC

Housing Works, Inc.

Morris Heights Health Center (MHHC)

Oak Orchard Community Health Center, Inc.

Sun River Health

Trillium Health

Universal Primary Care (Southern Tier CHCN)

Whitney Young Health

**North Carolina:**

North Carolina Community Health Center Association

CommWell Health

The C.W. Williams Community Health Center, Inc.

**Ohio:**

Ohio Association of Community Health Centers

Christian Community Health Services dba Crossroad Health Centers

Community Action Committee of Pike County

Community Health & Wellness Partners

Compass Community Health

Crossroads Health

Equitas Health

Family Health Care of Northwest Ohio, Inc.

Family Health Services of Darke County  
HealthSource of Ohio  
Heart of Ohio Family Health centers  
Hopewell Health Centers, Inc.  
LSS Health Center  
OVP Health Center, Inc.  
Ohio Hills Health Services  
Primary Health Solutions  
Signature Health, Inc.  
SpringVale Health Centers, Inc.  
The HealthCare Connection

**Oklahoma:**

Community Care of Southeast Kansas  
AVV Health Centers, Inc.  
Central Oklahoma Family Medical Center  
Community Health Centers, Inc.  
Community Health Connection  
Crossover Health Services  
East Central Oklahoma Family Health Center, Inc.  
Fairfax Medical Facilities, Inc.  
Good Shepherd Community Clinic, Inc.  
Great Salt Plains Health Center, Inc.  
Kiamichi Family Medical Center, Inc.  
Lawton Community Health Center  
Morton Comprehensive Health Services, Inc.  
Northeastern Oklahoma Community Health Centers, Inc.  
Pushmataha Family Medical Center, Inc.  
South Central Medical and Resource Center  
Stigler Health and Wellness Center, Inc.  
Variety Care

**Oregon:**

Oregon Primary Care Association  
Northwest Regional Primary Care Association  
Cascade AIDS Project  
Neighborhood Health Center  
Valley Family Health Care  
Yakima Valley Farm Workers Clinic

**Pennsylvania:**

BTMAC, Inc.  
The Wright Center for Community Health  
Universal Primary Care (Southern Tier CHCN)



**Puerto Rico:**

Salud Integral en la Montaña, Inc.

**Rhode Island:**

Rhode Island Health Center Association

Wood River Health

**South Carolina:**

South Carolina Primary Health Care Association

**South Dakota:**

Complete Health

**Tennessee:**

Tennessee Primary Care Association

Dayspring Health

River Valley Health

**Texas:**

Coastal Bend Wellness Foundation

Legacy Community Health

Lone Star Circle of Care

Longview Wellness Center, Inc. dba Wellness Pointe

United Medical Centers

Vivent Health

**US Territories:**

Pacific Islands Primary Care Association

**Utah:**

Association for Utah Community Health

Carbon Medical Service Association, Inc.

Community Health Centers, Inc.

Enterprise Valley Medical Clinic

Health West, Inc.

Mountainlands Community Health Center

Southwest Utah Community Health Center

Wayne Community Health Centers, Inc.

**Vermont:**

Bi-State Primary Care Association

Community Health Centers of the Rutland Region

Little Rivers Health Care, Inc.

Richford Health Center, Inc. (NOTCH)

**Virginia:**

Virginia Community Healthcare Association  
Greater Prince William Health Center  
Horizon Health Services, Inc.  
Tri-Area Community Health

**Washington:**

Washington Association for Community Health  
Northwest Regional Primary Care Association  
Cascade AIDS Project  
CHC of Snohomish County  
Columbia Basin Health Association  
Columbia Valley Community Health  
Community Health Association of Spokane (CHAS Health)  
Community Health Plan of Washington  
HealthPoint  
Lifelong  
Peninsula Community Health Services  
Sea Mar Community Health  
Seattle Roots Community Health  
Tri-Cities Community Health  
Unity Care Northwest  
Valley View Health Center  
Yakima Neighborhood Health Services  
Yakima Valley Farm Workers Clinic

**West Virginia:**

E.A. Hawse Health Center  
HHC South Fork Pharmacy  
Minnie Hamilton Health System

**Wisconsin:**

Wisconsin Primary Health Care Association  
Milwaukee Health Services, Inc.  
Progressive Community Health Centers  
Vivent Health

**Wyoming:**

Health West, Inc.