

Frequently Asked Questions

340B Reporting Requirement (N1 Transactions)

Key Takeaways:

- The “General Claims Submission Policy” for the 340B Drug Program was amended within the Provider Manual as of August 2020
- The N1 specific reporting requirement was introduced to the Provider Manual update that occurred in January 2021
- If you do not process 340B claims, this is not applicable to your entity.
- If you identify the claim as 340B during the claims initial submission, you do not have to resubmit as an N1 transaction.
- The 340B reporting requirement applies to the extent not prohibited by law.

Frequently Asked Questions:

Question: What is this requirement?

Answer: Express Scripts is requiring pharmacies to indicate when they have filled a 340B claim for an Express Scripts’ member.

Question: Is this a new requirement?

Answer: No. Express Scripts has requested 340B reporting from network pharmacies for several years. In August 2020, notice was provided to inform pharmacies the Express Scripts Provider Manual was updated to reflect this requirement as mandatory. In January 2021, Express Scripts updated the requirement and gave pharmacies notice of an additional method for 340B reporting starting March 1. A targeted reminder of the requirement was sent to pharmacies the week of February 22.

Question: Was there advance notice of this requirement?

Answer: Yes. Express Scripts has requested 340B reporting from network pharmacies for several years. In August 2020, notice was provided to inform pharmacies the Express Scripts Provider Manual was updated to reflect this requirement as mandatory. In January 2021, Express Scripts updated the requirement and gave pharmacies notice of an additional method for 340B reporting starting March 1. A targeted reminder of the requirement was sent to pharmacies the week of February 22.

Question: Why does Express Scripts want this information?

Answer: This change was made in the spirit of greater transparency. It is not intended to lead to a change in reimbursements rates, network participation, or a pharmacy’s ability to service as a Contract Pharmacy for 340B Covered Entities.

Question: Does this change the pharmacy's reimbursement?

Answer: No. This requirement does not change a pharmacy's reimbursement.

Question: Does this change the pharmacy's network participation?

Answer: No. This requirement does not change a pharmacy's network participation.

Question: What is the required timeframe to provide this information?

Answer: Pharmacies are required to indicate a claim as 340B at the time of submission. If a pharmacy subsequently identifies that a claim is a 340B claim after submission, the pharmacy should update Express Scripts within ten (10) business days of such identification.

Question: Does this notice apply to all Express Scripts claims?

Answer: Yes. This requirement applies to all Express Scripts claims unless prohibited by law.

Question: Does this notice only apply to certain types of pharmacies?

Answer: No. This notice applies to all pharmacies in the Express Scripts network that process 340B claims unless prohibited by law.

Question: What if a pharmacy is unable to meet this requirement by March 1, 2021?

Answer: Please reach out to your Express Scripts Network Account Director for further details.

Question: Will additional information be provided?

Answer: If additional information is made available, it will be forthcoming through the PRC or Express Communications.

Question: Is there a list of BIN/PCNs available so we can confirm compliance with this requirement for the impacted plans?

Answer: This requirement applies to all Express Scripts BINs and PCNs unless prohibited by law.

Question: Does the 340B reporting requirement only apply to Medicaid claims?

Answer: No. This requirement applies to all Express Scripts claims unless prohibited by law.