



September 2025

Pfizer Provides Update for One Contract Pharmacy Exemptions

Dear 340B Hospital Covered Entity,

Pfizer is communicating an update, effective November 1, 2025, to ensure ongoing compliance with Pfizer's Defined Distribution System.

Pfizer has conducted a review of 340B priced product shipments for covered entity hospitals with an approved One Contract Pharmacy Exemption registered on 340BESP, for the period of April 1, 2025 to August 15, 2025. For your institution, Pfizer has identified shipments to address locations inconsistent with Pfizer's policy.

As described in Pfizer's Announcement letter for Defined Distribution System - Products (Exhibit A) available at <https://www.340besp.com/resources>, 340B covered entity hospitals may only receive shipments to one contract pharmacy location if they have attested on 340BESP <https://www.340besp.com/designations> that they do not have an in-house pharmacy capable of dispensing 340B priced products.

However, in our recent review of 340B priced sales and shipping transactions for these products, Pfizer has identified instances of 340B priced product shipments to your 340B hospital street address or any shipping address(es) location listed on your 340B Covered Entity details record in OPAIS [340B-Search Covered Entities](#) *and* to one or more of your 340B hospital's OPAIS registered contract pharmacy locations listed solely on [340B-Search Contract Pharmacies](#).

Based upon our review, effective November 1, 2025, Pfizer will end date your approved one contract pharmacy exemption registered on 340BESP. Wholesalers will also stop shipping 340B priced products to any of your 340B hospital's contract pharmacy locations registered solely on the HRSA 340B OPAIS contract pharmacy database at [340B-Search Contract Pharmacies](#).

To ensure that all 340B eligible covered entities and their patients continue to have access to these Pfizer products at 340B prices, all 340B hospital covered entities will continue to receive shipments of these products at 340B prices to locations listed on their OPAIS Covered Entity Parent and Child records as "Street Address" and "Shipping Addresses", available at [340B-Search Covered Entities](#).

If, after your review of this information, you would like to request prospective 340B priced product shipments to only One Contract Pharmacy address location, and will attest that your institution does not have an in-house pharmacy capable of dispensing these 340B priced products (in compliance with Pfizer's policy), please contact Pfizer at 340BCP@pfizer.com.

Additional details are found in these FAQs:

Defined Distribution System - Products FAQs (Exhibit A-1, page 10)

Q: My covered entity does have an in-house pharmacy that is capable of purchasing and dispensing outpatient drugs, but we don't use it to dispense one or more of these products. Can I designate one contract pharmacy instead?

A: No. If a covered entity has an in-house pharmacy capable of dispensing 340B priced products, the entity must use that pharmacy and cannot designate a contract pharmacy.

Q: My covered entity has a contract pharmacy relationship with a pharmacy that is owned by our health system. Is this pharmacy able to engage in Bill To / Ship To transactions?

A: Contract pharmacies that are wholly owned by a 340B hospital covered entity or have common ownership with a 340B hospital are not eligible to receive shipments of these Pfizer products on a Bill To / Ship To basis at the 340B price.

Thank you for your interest in Pfizer's products for your patients.

Paul Hiley



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