**Purpose:** Establishing a non-GPO/WAC account provides a compliant solution for hospitals subject to the GPO Prohibition to obtain covered outpatient drugs for patients ineligible for 340B drugs. For example, non-GPO/WAC accounts may be used for Medicaid carve-out patients or mixed-use areas using neutral inventory.

This tool describes types of pricing contracts available to 340B hospital entities, and illustrates which contracts may be loaded into the respective purchasing account (340B/PHS vs. non-GPO/WAC). All contract pricing extended to covered entities under the 340B Prime Vendor, managed by Apexus, provides manufacturers full price protections, and provides contracting infrastructure to support covered entity compliance with the GPO Prohibition.

|  |  |  |  |
| --- | --- | --- | --- |
| Contract Name | Description | 340B Account | Non-GPO/ WAC Account |
| 340B/Public Health Service (PHS) | Manufacturer-calculated price for 340B covered outpatient drugs according to the 340B statutory formula. | Yes | No |
| PVP Sub-340B | Contracted pricing available to PVP participants that is below the statutory 340B ceiling price. This price has been negotiated by the Prime Vendor with the manufacturer on behalf of 340B covered entities. | Yes | No |
| PVP Sub-WAC | Contracted pricing available to PVP participants that are subject to the GPO Prohibition and is below the wholesale acquisition cost (WAC). This price has been negotiated by the Prime Vendor with the manufacturer on behalf of 340B covered entities subject to the GPO Prohibition. | No | Yes |
| PVP Value-Added | Contracted pricing available to PVP participants on products that are not covered outpatient drugs under the Medicaid Drug Rebate Program such as certain vaccines, blood glucose monitoring supplies, prescription vials and labels, etc. | Yes | Yes |
| Individual Hospital Agreement | Agreement negotiated directly between a single 340B covered entity (single 340B ID) and the manufacturer. | Yes | Yes |

For information on non-GPO/WAC purchasing strategies, see the “[WAC Account Purchasing Strategies](https://www.340bpvp.com/Documents/Public/340B%20Tools/wac-account-purchasing-strategies.docx)” tool.

*This tool is written to align with Health Resources and Services Administration (HRSA) policy, and is provided only as an example for the purpose of encouraging 340B Program integrity. This information has not been endorsed by HRSA and is not dispositive in determining compliance with or participatory status in the 340B Drug Pricing Program. 340B stakeholders are ultimately responsible for 340B Program compliance and compliance with all other applicable laws and regulations. Apexus encourages all stakeholders to include legal counsel as part of their program integrity efforts.*

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