



# **The 340B Drug Rebate Program and its Potential Impacts on Annual Revenues, Executive Compensation, and Charity Care Provision in Eligible Covered Entities:**

## **Supplemental Report – February 2025**

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## **Executive Summary**

According to the Health Resources and Services Administration (HRSA), revenues generated by the 340B Drug Pricing Program are intended to be leveraged to increase access to care and treatment for vulnerable patient populations living with conditions that require costly outpatient medications and treatments ([United States, Government Accountability Office, 2023](#)). Concerns about the utilization of those dollars have long existed, particularly as they relate to questions of the reporting requirements and disparate levels of transparency and accountability for different types of healthcare provider organizations participating in the program, known as covered entities. This supplemental report was initiated by ADAP Advocacy as part of its “340B Project” and the Community Access National Network (CANN) as part of its “340B: What About Me?” initiative, and examines publicly available Internal Revenue Service (IRS) 990 filings for 33 additional 340B-eligible covered entities, including 15 Hospitals, 3 Sexually Transmitted Disease Clinics, and 15 HRSA-Funded Health Centers (the latter two being classified as ‘Other’ entity types) to determine the annual revenues, levels of executive compensation, and the provision of charity care in the years prior and after each entity’s eligibility for the 340B program. We discovered that annual revenues across all newly examined 33 covered entities increased by an average of 772.92%, that executive compensation increased by an average of 237.11%, and that the provision of charity care as a percentage of annual hospital revenues *decreased* by 34.80%. All averages exclude outliers. This research makes no claims as to the propriety or impropriety of 340B revenue utilization; rather, it elucidates the significant impacts of 340B on annual revenues across covered entity types.

*Keywords: 340B, Hospitals, Covered Entities, Executive Compensation, Charity Care*



## **Findings – February 2025**

In 2025, ADAP Advocacy and CANN examined publicly available IRS 990 filings for an additional [33 340B-eligible covered entities](#), including 15 Hospitals and 18 Other entity types.

This research complemented similar research done on [69 340B-eligible covered entities in 2024](#).

Across all entity types for report two, these data indicate that among the newly examined 33 covered entities:

- Annual revenues increased by an average of **772.92%**, excluding outliers, and;
- Executive compensation increased by an average of **237.11%**, excluding outliers.

## **Newly Examined Hospital Findings**

### **Annual Revenues**

Annual revenues across the new hospitals examined who are eligible to receive 340B rebates increased by an average of **207.23%**. The five hospitals with the highest increases in revenues include:

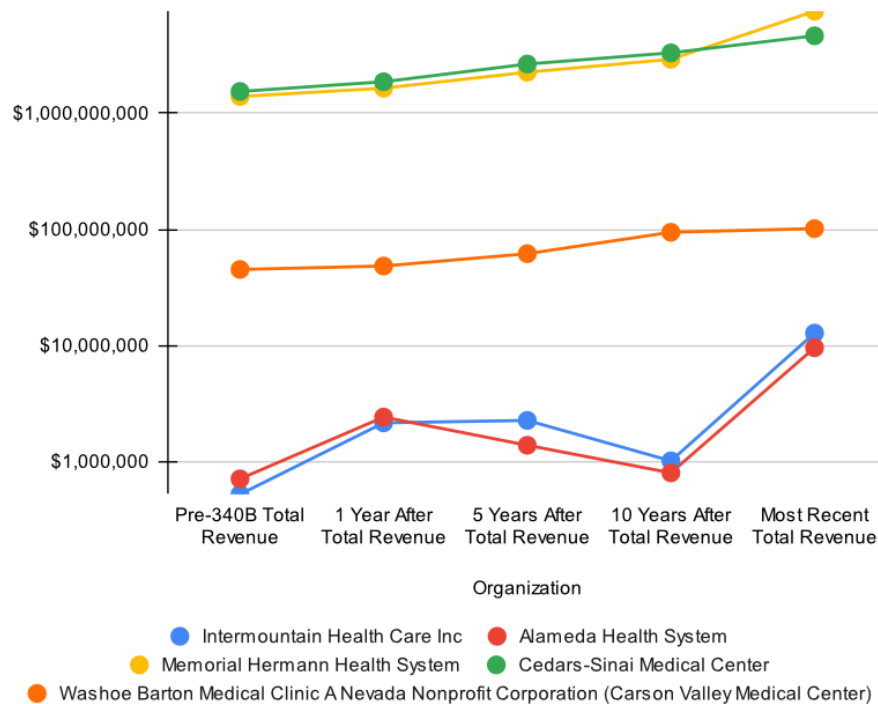
- Intermountain Health Care Inc (Salt Lake City, UT) – 2,349.38% (excluded from average)
- Alameda Health System (Oakland, CA) 1,248.54%
- Memorial Hermann Health System (Houston, TX) – 443.11%
- Cedars-Sinai Medical Center (Los Angeles, CA) – 201.65%
- Washoe Barton Medical Clinic A Nevada Nonprofit Corporation (Carson Valley Medical Center) (Gardnerville, NV) – 124.89% (Figure 1)



# REVIEW OF THE 340B DRUG PRICING PROGRAM COVERED ENTITIES' ANNUAL REVENUES, EXECUTIVE COMPENSATION & CHARITY CARE Supplemental Report – February 2025

**Figure 1 - Hospitals with the Largest Increases in Annual Revenues After Receiving Eligibility for the 340B Drug Rebate Program: New Hospitals for 2025 Supplemental Report**

## Hospitals with the Largest Increases in Annual Revenues After Receiving Eligibility for the 340B Drug Rebate Program: New Hospitals for 2025 Supplemental Report





## REVIEW OF THE 340B DRUG PRICING PROGRAM COVERED ENTITIES' ANNUAL REVENUES, EXECUTIVE COMPENSATION & CHARITY CARE Supplemental Report – February 2025

The five hospitals with the lowest increases or that reported net losses in revenues include:

- Regional West Medical Center (Scottsbluff, NE) – -17.79% (excluded from average)
- Grays Harbor Community Hospital (Aberdeen, WA) – -8.08%
- Loma Linda University Medical Center, Inc. (Loma Linda, CA) – 25.83%
- Russell Hospital Corporation (Alexander City, AL) – 30.36%
- Colorado West Healthcare System (Community Hospital) (Grand Junction, CO) – 35.66%

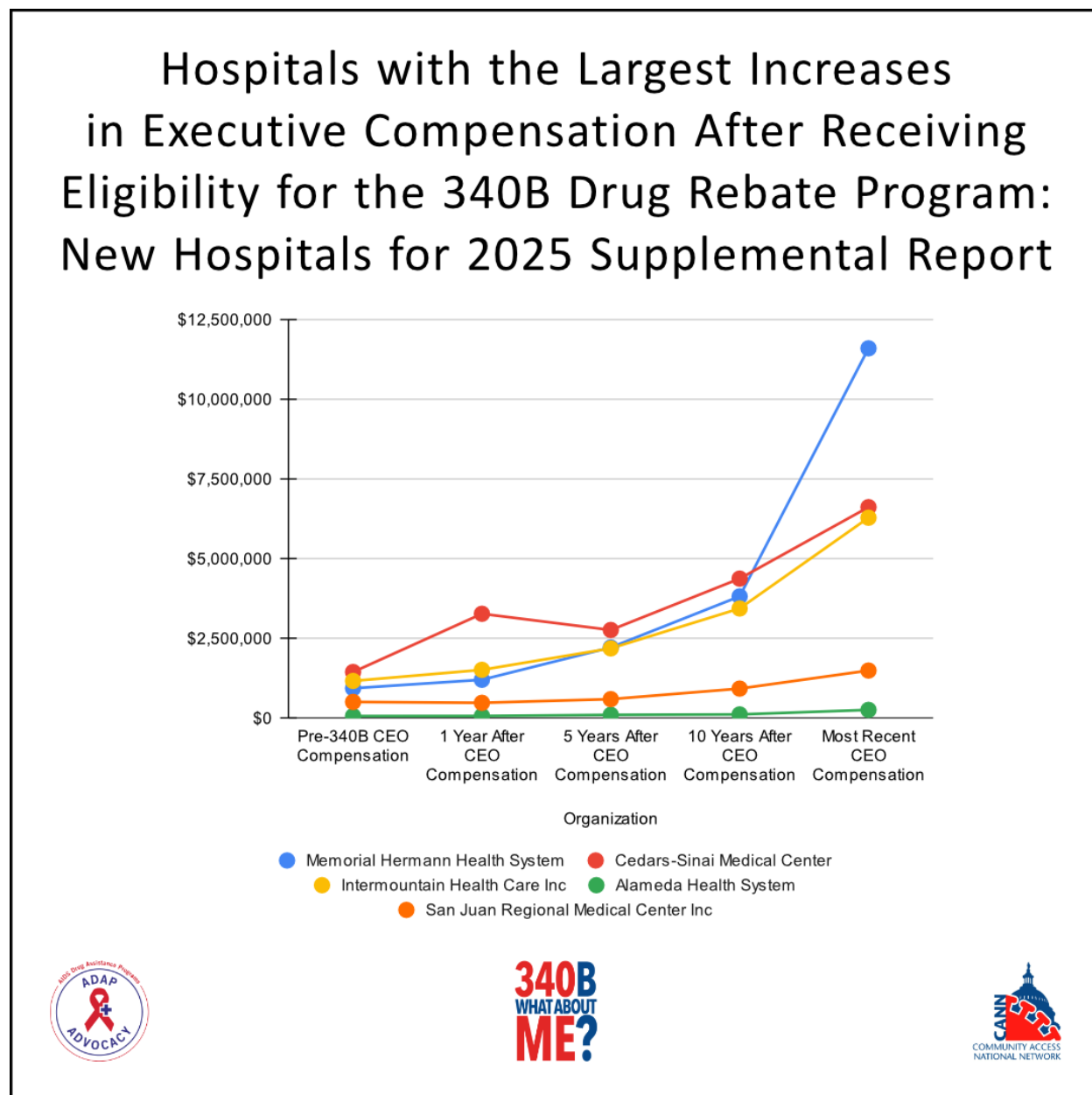
### Executive Compensation

Executive compensation across all newly examined hospitals increased by an average of **128.65%** and *decreased* as a percentage of annual revenues by 1.83%. The five hospitals with the highest increases in executive compensation include:

- Memorial Hermann Health System – 1,127.36% (excluded from average)
- Cedars-Sinai Medical Center – 355.23%
- Intermountain Health Care Inc – 313.14%
- Alameda Health System – 260.58%
- San Juan Regional Medical Center Inc (Farmington, NM) – 190.30% (Figure 2)



**Figure 2 - Hospitals with the Largest Increases in Executive Compensation After Receiving Eligibility for the 340B Drug Rebate Program: New Hospitals for 2025 Supplemental Report**





## REVIEW OF THE 340B DRUG PRICING PROGRAM COVERED ENTITIES' ANNUAL REVENUES, EXECUTIVE COMPENSATION & CHARITY CARE Supplemental Report – February 2025

The five hospitals with the lowest increases or that reported decreases in executive compensation include:

- Washoe Barton Medical Clinic A Nevada Nonprofit Corporation (Carson Valley Medical Center) – -43.90% (excluded from average)
- Russell Hospital Corporation – -35.60%
- Regional West Medical Center – -34.77%
- Colorado West Healthcare System (Community Hospital) – -2.52%
- Loma Linda University Medical Center, Inc. – 44.97%

### Charity Care as a Percentage of Annual Revenues

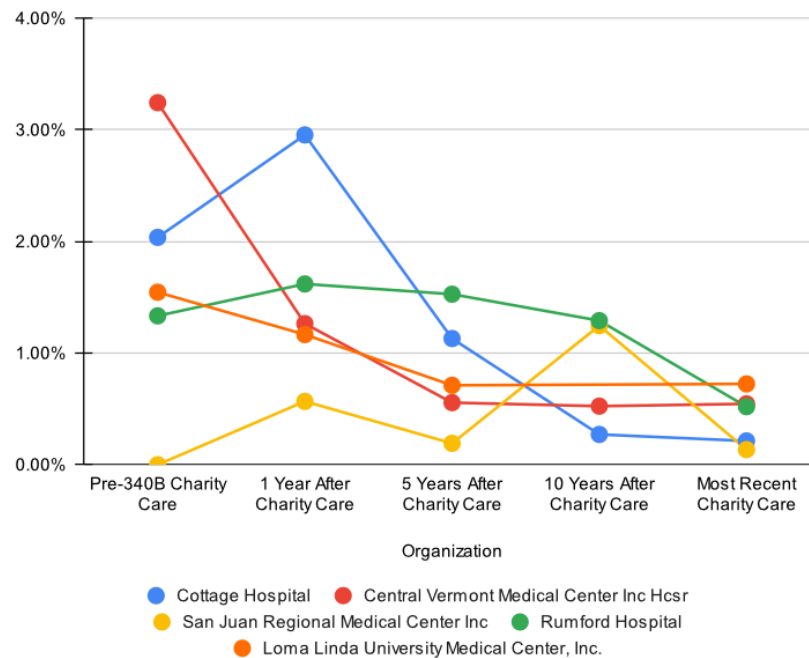
Across all new hospitals examined, the provision of charity care at cost as a percentage of annual revenues **decreased** by an average of **16.57%**. The five hospitals that saw the largest decreases in charity care expenditures include:

- Cottage Hospital (Woodsville, NH) – -89.53% (Excluded from average)
- Central Vermont Medical Center Inc Hcsr (Berlin, VT) – -83.18%
- San Juan Regional Medical Center Inc – -76.08%
- Rumford Hospital (Rumford, ME) – -60.99%
- Loma Linda University Medical Center, Inc. – -53.14% (Figure 3)



**Figure 3 - Decreases in the Provision of Charity Care as a Percentage of Annual Revenue in Hospitals After Receiving Eligibility for the 340B Drug Rebate Program: New Hospitals for 2025 Supplemental Report**

## Decreases in the Provision of Charity Care as a Percentage of Annual Revenue in Hospitals After Receiving Eligibility for the 340B Drug Rebate Program: New Hospitals for 2025 Supplemental Report







## REVIEW OF THE 340B DRUG PRICING PROGRAM COVERED ENTITIES' ANNUAL REVENUES, EXECUTIVE COMPENSATION & CHARITY CARE Supplemental Report – February 2025

Five of the newly examined hospitals increased spending on charity care as a percentage of annual revenues, including:

- Regional West Medical Center – 8.85%
- Memorial Hermann Health System – 13.00%
- Colorado West Healthcare System (Community Hospital) – 131.32%
- Grays Harbor Community Hospital – 149.75%
- Russell Hospital Corporation – 1,168.49%

### Newly Examined Other Entity Type Findings

#### Annual Revenues

Annual revenues across all newly examined Other Entity Types eligible to receive 340B rebates increased by an average of **1,757.50%**. The five organizations with the highest increases in revenues include:

- Circle Care Center (World Health Clinicians, Inc.) (Norwalk, CT) – 77,974.09%  
(excluded from average)
- AltaMed Health Services Corporation (Commerce, CA) – 3,554.03%
- Music City PrEP (Nashville, TN) – 3,092.75%
- San Ysidro Health Center (Centro De Salud De La Comunidad De San Ysidro Inc) (San Ysidro, CA) – 2,597.19%
- Neighborhood Health - Escondido (Escondido, CA) – 1,559.74% (Figure 4)

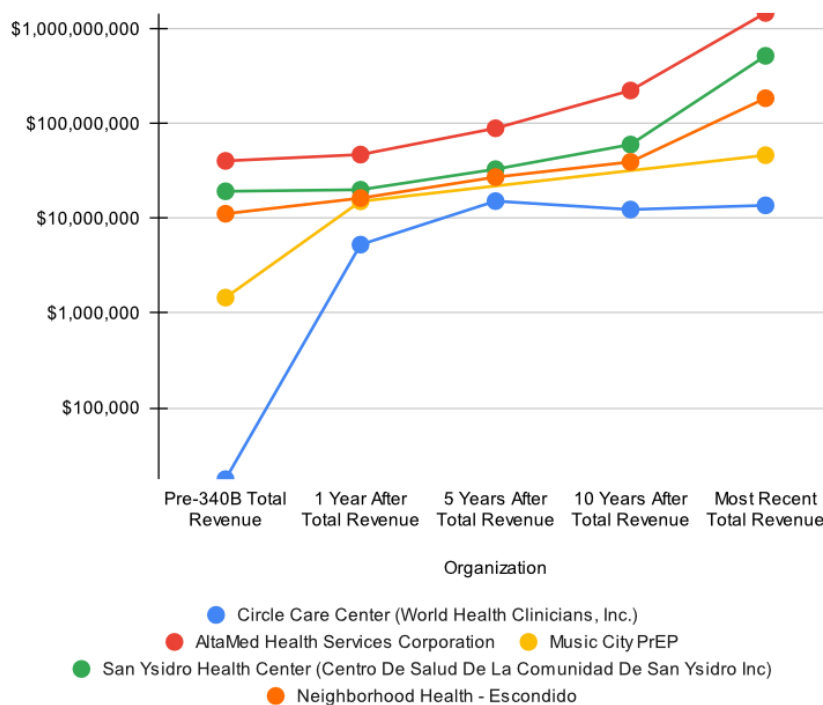


**Figure 4 - Other Covered Entity Types with the Largest Increases in Annual Revenues**

**After Receiving Eligibility for the 340B Drug Rebate Program: New Entities for 2025**

**Supplemental Report**

## Other Covered Entity Types with the Largest Increases in Annual Revenues After Receiving Eligibility for the 340B Drug Rebate Program: New Entities for 2025 Supplemental Report





## REVIEW OF THE 340B DRUG PRICING PROGRAM COVERED ENTITIES' ANNUAL REVENUES, EXECUTIVE COMPENSATION & CHARITY CARE Supplemental Report – February 2025

The five organizations with the lowest increases in revenues include:

- Cornell Scott-Hill Health Corporation (New Haven, CT) – 72.48% (excluded from average)
- AIDS Foundation Houston, Inc. (Allies in Hope) (Houston, TX) – 123.96%
- Equity Health (San Francisco Medical Center Outpatient Improvement Programs, Inc.) (San Francisco, CA) – 131.79%
- Charter Oak Health Center (Hartford, CT) – 250.52%
- Tiburcio Vasquez Health Center, Inc. (Hayward, CA) – 297.54%

### Executive Compensation

Executive compensation across all newly examined Other Entity types increased by an average of **419.79%** but decreased as a percentage of annual revenues by 48.04%. The five organizations with the highest increases in executive compensation include:

- Music City PrEP – 1,760.44% (excluded from average)
- San Ysidro Health Center (Centro De Salud De La Comunidad De San Ysidro Inc) – 760.30%
- Comprehensive Community Health Centers, Inc. – 646.97%
- AltaMed Health Services Corporation – 609.64%
- Golden Valley Health Centers (Merced, CA) – 394.92% (Figure 5)

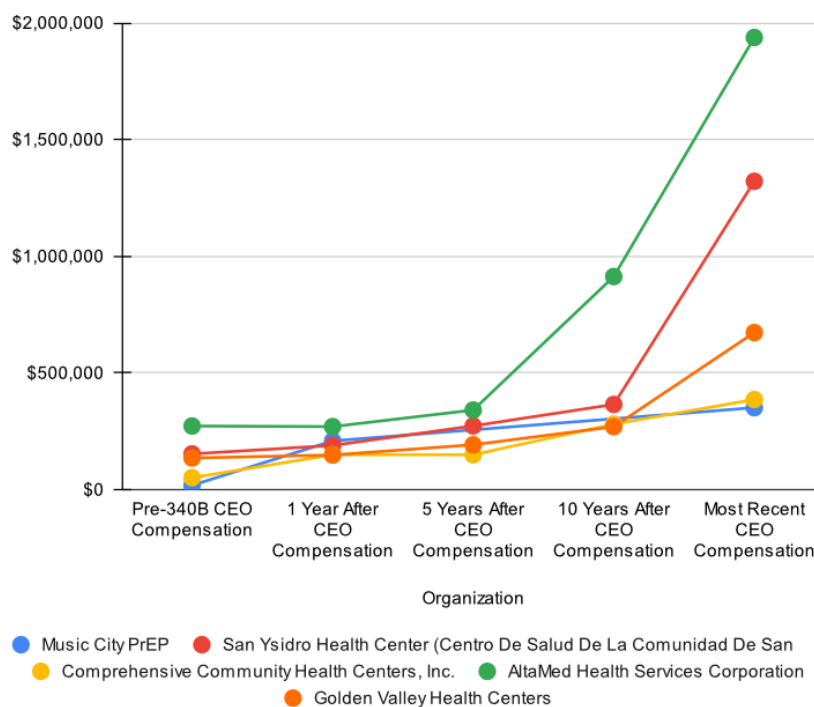


**Figure 5 - Other Covered Entity Types with the Largest Increases in CEO Compensation**

**After Receiving Eligibility for the 340B Drug Rebate Program: New Entities for 2025**

**Supplemental Report**

## Other Covered Entity Types with the Largest Increases in CEO Compensation After Receiving Eligibility for the 340B Drug Rebate Program: New Entities for 2025 Supplemental Report





**REVIEW OF THE 340B DRUG PRICING PROGRAM COVERED ENTITIES’  
ANNUAL REVENUES, EXECUTIVE COMPENSATION & CHARITY CARE**  
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The five organizations with the lowest increases in executive compensation include:

- Equity Health (San Francisco Medical Center Outpatient Improvement Programs, Inc.) – -2.31% (excluded from average)
- Circle Care Center (World Health Clinicians, Inc.) – 1.45%
- Charter Oak Health Center – 7.62%
- AIDS Foundation Houston, Inc. (Allies in Hope) – 61.63%
- Cornell Scott-Hill Health Corporation (New Haven, CT) – 86.57%



## Updated Findings Across All Entity Types (2023–2025)

ADAP Advocacy and CANN have examined publicly available IRS 990 filings for a total of [102 340B-eligible covered entities](#), including 24 HIV Care providers, 53 Hospitals, and 25 Other entity types (i.e., HRSA-sponsored clinics, STD clinics). These covered entities can be viewed individually at [340Bmap.org](https://340Bmap.org). Across all entity types, these data indicate that:

- Annual revenues increased by an average of **1,002.20%**, and;
- Executive compensation increased by an average of **229.59%**.

**Changes from the 2024 report are highlighted in bold text.**

### Updates to HIV Care Provider Findings

No updates were needed for the 2025 Supplemental Report because no additional HIV clinics were examined for Report Two.

### Updates to Hospital Findings

#### Annual Revenues

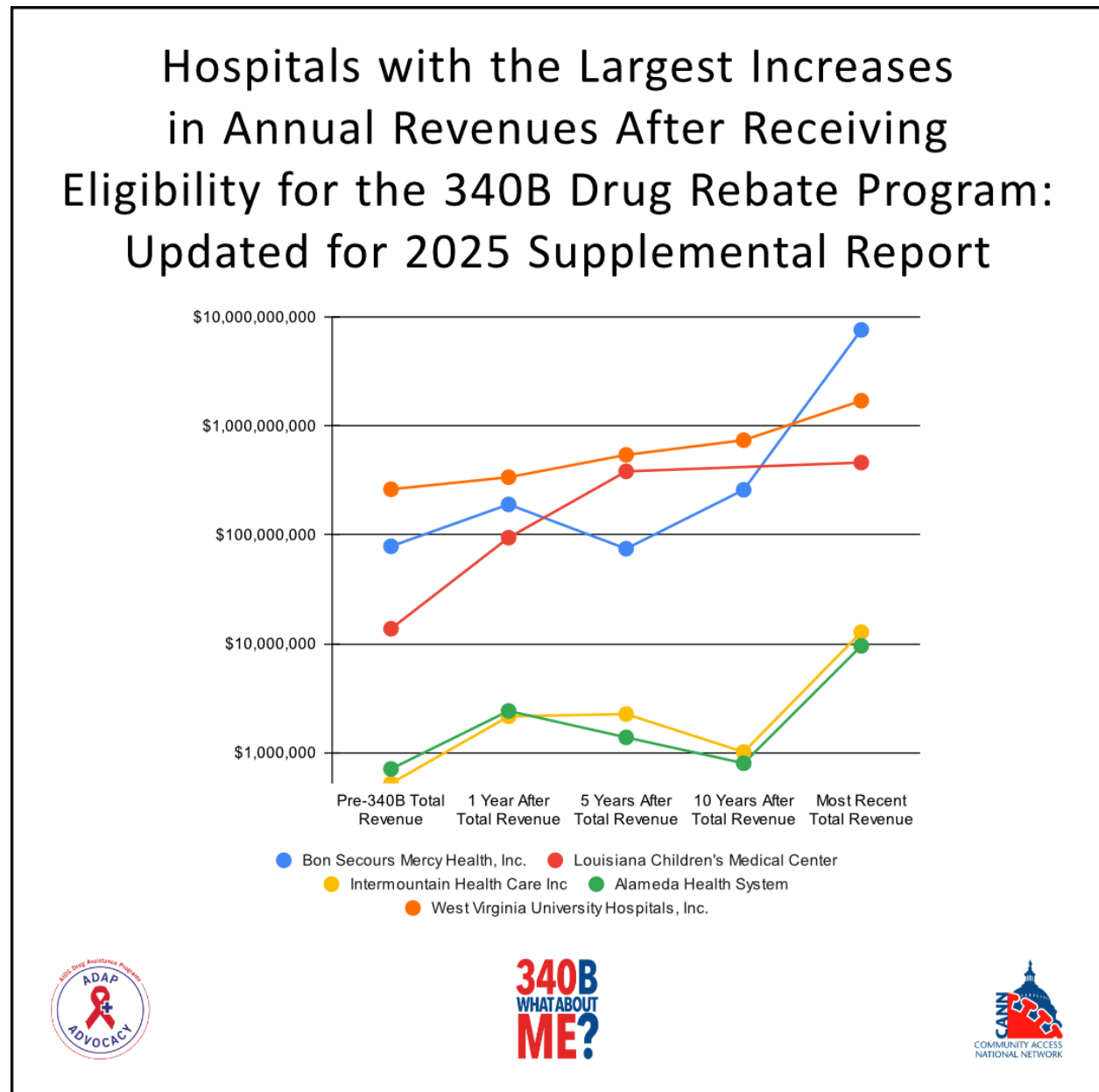
Annual revenues across all hospitals eligible to receive 340B rebates increased by an average of **191.62%**. The five hospitals with the highest increases in revenues include:

- Bon Secours Mercy Health, Inc. (Richmond, VA) – 9,618.93% (excluded from average)
- Louisiana Children's Medical Center (New Orleans, LA) – 3,254.41%
- **Intermountain Health Care Inc – 2,349.38%**
- **Alameda Health System – 1,248.54%**
- **West Virginia University Hospitals, Inc. – 550.53%** (Figure 6)



**REVIEW OF THE 340B DRUG PRICING PROGRAM COVERED ENTITIES' ANNUAL REVENUES, EXECUTIVE COMPENSATION & CHARITY CARE**  
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**Figure 6 - Hospitals with the Largest Increases in Annual Revenues After Receiving Eligibility for the 340B Drug Rebate Program: Updated for 2025 Supplemental Report**





## REVIEW OF THE 340B DRUG PRICING PROGRAM COVERED ENTITIES' ANNUAL REVENUES, EXECUTIVE COMPENSATION & CHARITY CARE Supplemental Report – February 2025

The five hospitals with the lowest increases or that reported net losses in revenues include:

- Ascension St. John Hospital (St. Louis, MO) – -35.46% (excluded from average)
- Ascension St. Francis Hospital (St. Louis, MO) – -18.35%
- **Regional West Medical Center (Scottsbluff, NE) – -17.79%**
- Bon Secours St. Mary's Hospital of Richmond (Richmond, VA) – -16.75%
- Huron Regional Medical Center (Huron, SD) – -8.54%

### Executive Compensation

Executive compensation across all hospitals increased by an average of **178.70%** and increased as a percentage of annual revenues by 11.47% ([Table E2](#)). The five hospitals with the highest increases in executive compensation include:

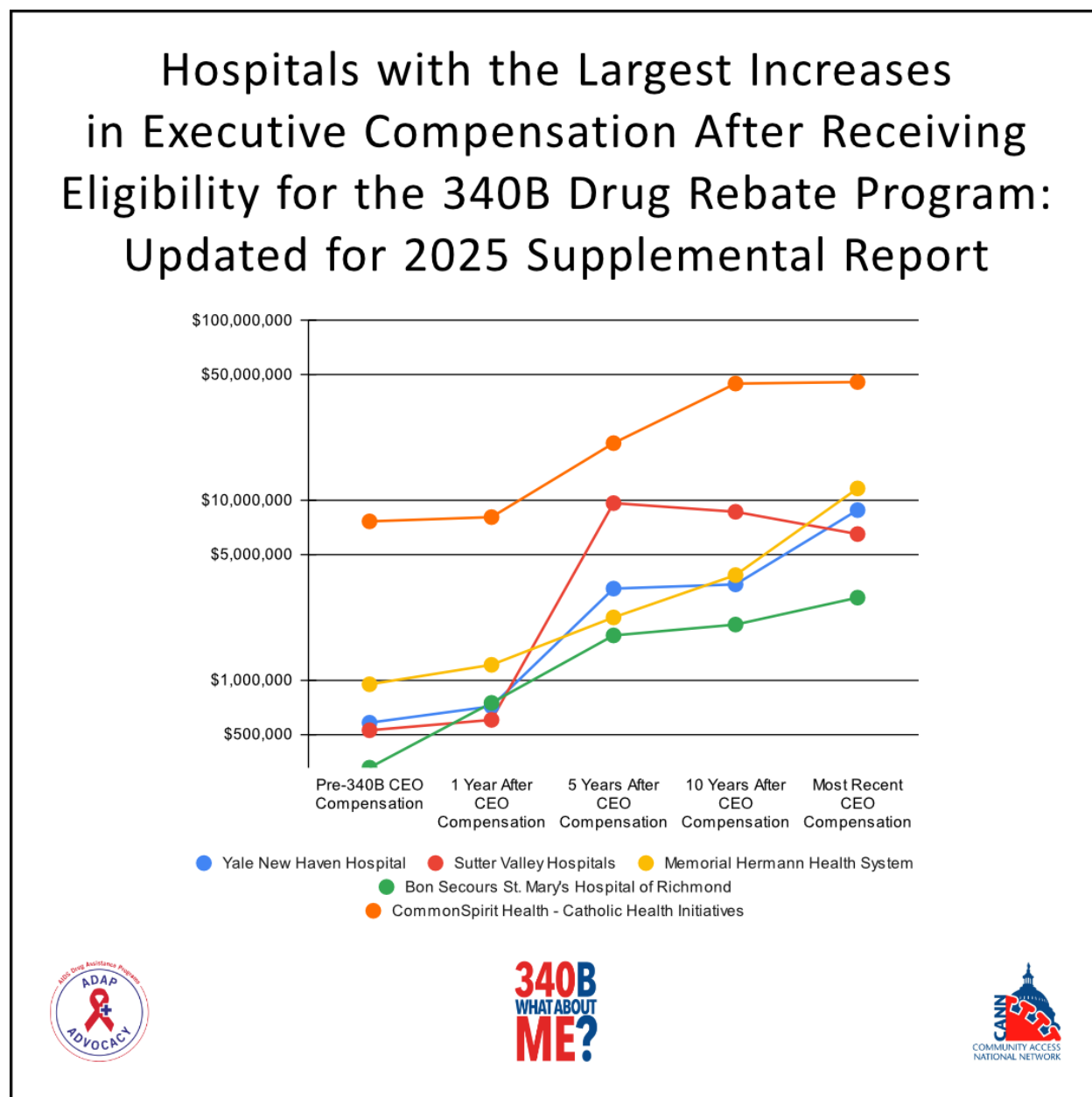
- Yale New Haven Hospital – 1,421.15% (excluded from average)
- Sutter Valley Hospitals (Sacramento, CA) – 1,133.42%
- **Memorial Hermann Health System (Houston, TX) – 1,127.36%**
- Bon Secours St. Mary's Hospital of Richmond - 782.18%
- CommonSpirit Health - Catholic Health Initiatives (Des Moines, IA) – 495.31% (Figure 7)





REVIEW OF THE 340B DRUG PRICING PROGRAM COVERED ENTITIES' ANNUAL REVENUES, EXECUTIVE COMPENSATION & CHARITY CARE  
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**Figure 7 - Hospitals with the Largest Increases in Executive Compensation After Receiving Eligibility for the 340B Drug Rebate Program: Updated for 2025 Supplemental Report**





## REVIEW OF THE 340B DRUG PRICING PROGRAM COVERED ENTITIES' ANNUAL REVENUES, EXECUTIVE COMPENSATION & CHARITY CARE Supplemental Report – February 2025

The five hospitals with lowest increases or that reported lower executive compensation include:

- **Washoe Barton Medical Clinic A Nevada Nonprofit Corporation (Carson Valley Medical Center) (Gardnerville, NV) – -43.90% (excluded from average)**
- Hartford Hospital (Hartford, CT) – -37.89%
- **Russell Hospital Corporation (Alexander City, AL) – -35.60%**
- **Regional West Medical Center (Scottsbluff, NE) – -34.77%**
- **Pleasant Valley Hospital, Inc. (Point Pleasant, WV) – -34.58%**

Five hospitals saw big increases in executive compensation as a percentage of annual revenues:

- Bon Secours St. Mary's Hospital of Richmond – 959.68% (excluded from average)
- Ascension St. John Hospital – 182.12%
- Yale New Haven Hospital – 176.21%
- Saint Joseph Health System Inc (Saint Joseph Mount Sterling) – 170.31%
- CommonSpirit Health - Catholic Health Initiatives – 124.75%

### Charity Care as a Percentage of Annual Revenues

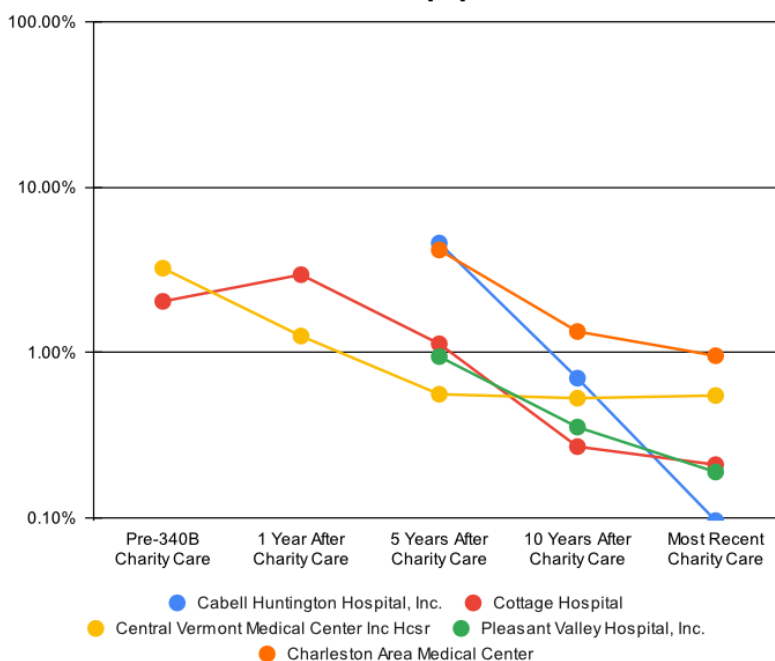
Across all hospitals examined, the provision of charity care at cost as a percentage of annual revenues decreased by an average of **25.65%**. The five hospitals that saw the largest decreases in charity care expenditures included:

- **Russell Hospital Corporation – -100.00%**
- **San Juan Regional Medical Center Inc – -100.00%**
- **Cedars-Sinai Medical Center – -100.00%**
- **Froedtert Memorial Lutheran Hospital, Inc. – -100.00%**
- **Cabell Huntington Hospital, Inc. (Huntington, WV) – -97.90% (Figure 8)**



**Figure 8 - Decreases in the Provision of Charity Care as a Percentage of Annual Revenue in Hospitals After Receiving Eligibility for the 340B Drug Rebate Program: Updated for 2025 Supplemental Report**

## Decreases in the Provision of Charity Care as a Percentage of Annual Revenue in Hospitals After Receiving Eligibility for the 340B Drug Rebate Program: Updated for 2025 Supplemental Report





## REVIEW OF THE 340B DRUG PRICING PROGRAM COVERED ENTITIES' ANNUAL REVENUES, EXECUTIVE COMPENSATION & CHARITY CARE Supplemental Report – February 2025

Thirteen hospitals increased spending on charity care as a percentage of annual revenues, including:

- Huron Regional Medical Center – 291.77%
- Wagner Community Memorial Hospital (Sioux Falls, SD) – 170.95%
- **Grays Harbor Community Hospital (Aberdeen, WA) – 149.75%**
- St. Luke's South Hospital, Inc. (Overland Park, KS) – 135.16%
- **Colorado West Healthcare System (Community Hospital) (Grand Junction, CO) – 131.32%**
- Ascension St. Francis Hospital – 114.86%
- Bon Secours St. Francis Xavier Hospital (Ladson, SC) – 86.74%
- Munson Healthcare Otsego Memorial Hospital (Traverse City, MI) – 19.61%
- Yale New Haven Hospital – 13.78%
- Piedmont Athens Regional Medical Center Inc (Athens, GA) – 13.20%
- **Memorial Hermann Health System (Houston, TX) – 13.00%**
- **Regional West Medical Center (Scottsbluff, NE) – 8.85%**
- Avera Gettysburg (Gettysburg, SD) – 7.26%

### Other Entity Findings

#### Annual Revenues

Annual revenues across all Other entity types eligible to receive 340B rebates increased by an average of **1,038.96%**. The three covered entities with the highest increases in revenues include:



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- **Circle Care Center (World Health Clinicians, Inc.) – 77,974.09% (excluded from average)**
- **Advocates for a Healthy Community - Jordan Valley Health Care Center (Springfield, MO) – 5,663.54% (excluded from average)**
- **AltaMed Health Services Corporation – 3,554.03%**

The three entities with the lowest increases include:

- **Cornell Scott-Hill Health Corporation – 72.48% (excluded from average)**
- **AIDS Foundation Houston, Inc. (Allies in Hope) – 123.96%**
- **Equity Health (San Francisco Medical Center Outpatient Improvement Programs, Inc.) – 131.79%**

### Executive Compensation

Executive compensation across all Other covered entity types increased by an average of **238.65%** but decreased as a percentage of annual revenues by **52.21%**. The three entities with the highest increases in executive compensation include:

- **Music City PrEP – 1,760.44% (excluded from average)**
- **San Ysidro Health Center (Centro De Salud De La Comunidad De San Ysidro Inc) – 760.30%**
- **Comprehensive Community Health Centers, Inc. (Glendale, CA) – 646.97%**



## REVIEW OF THE 340B DRUG PRICING PROGRAM COVERED ENTITIES' ANNUAL REVENUES, EXECUTIVE COMPENSATION & CHARITY CARE Supplemental Report – February 2025

The three entities with the lowest increases in executive compensation included:

- **Equity Health (San Francisco Medical Center Outpatient Improvement Programs, Inc.) – -2.31% (excluded from average)**
- **Total Health Care, Inc. (Baltimore, MD) – 19.88%**
- **Kansas City Care Clinic (Kansas City, MO) – 22.10%**

Two Other entity types saw increases in executive compensation as a percentage of annual revenues, including:

- **Jessie Trice (Miami, FL) – 46.46% (excluded from average)**
- **Cornell Scott-Hill Health Corporation (New Haven, CT) – 6.78%**