



# Government Relations

# PBM State Licensure Law Comparison

A map of the United States with 15 states highlighted in green. These states are Maine (ME), New Hampshire (NH), Massachusetts (MA), Rhode Island (RI), Connecticut (CT), New Jersey (NJ), Delaware (DE), Maryland (MD), Virginia (VA), West Virginia (WV), Pennsylvania (PA), New York (NY), Vermont (VT), North Dakota (ND), Minnesota (MN), Iowa (IA), Missouri (MO), Arkansas (AR), Oklahoma (OK), Tennessee (TN), Georgia (GA), South Carolina (SC), and Florida (FL). Three of these green states are further highlighted with colored borders: North Dakota (ND) has a red border, Arkansas (AR) has an orange border, and Oklahoma (OK) has a blue border. The remaining 35 states are shown in white with black outlines and labels. The District of Columbia is labeled as 'Washington D.C.' with a line pointing to its location.

37	Meaningful PBM Licensure Laws
8	Enforceable PBM State Registration Law that is effectively Licensure
1	Law Upheld at Federal Appellate Level (2021)
1	Law's Application to ERISA and Part D overturned by Federal Appellate Court (2023); SCOTUS appeal application denied (2025)
1	Law Upheld by SCOTUS (2020)
#3	Licensure Law Provides Exemption for Self-Funded & / or Medicare Plans
*23	State Insurance Department PBM Specific Online Complaint Form

A map of the United States with states colored green, yellow, or white. States with asterisks (\*) are green, states with # are yellow, and states with no symbol are white. ND is highlighted with a red box, and AR is highlighted with an orange box. OK is highlighted with a blue box. The map includes labels for all 50 states and D.C.

State	Color	Symbol
WA	Green	#
OR	Green	*
ID	Yellow	
MT	Green	
ND	Green	*
WY	Green	
SD	Green	
NE	Green	*
KS	White	
TX	White	*
OK	Green	*
IA	Yellow	*
MO	Green	
IL	Yellow	*
IN	Green	
MI	Green	#
OH	White	*
PA	Yellow	
NY	Green	
VT	Green	
ME	Green	
NH	Green	
MA	Green	*
RI	Green	
CT	Green	
NJ	Green	#
DE	Green	*
MD	Green	*
VA	Yellow	*
NC	Green	*
SC	Green	*
GA	Green	*
FL	Green	
MS	Green	*
AL	Green	*
LA	Green	*
AR	Green	*
TX	White	*
OK	Green	*
MO	Green	
IL	Yellow	*
IN	Green	
MI	Green	#
OH	White	*
PA	Yellow	
NY	Green	
VT	Green	
ME	Green	
NH	Green	
MA	Green	*
RI	Green	
CT	Green	
NJ	Green	#
DE	Green	*
MD	Green	*
VA	Yellow	*
NC	Green	*
SC	Green	*
GA	Green	*
FL	Green	
MS	Green	*
AL	Green	*
LA	Green	*
AR	Green	*
TX	White	*
OK	Green	*
MO	Green	
IL	Yellow	*
IN	Green	
MI	Green	#
OH	White	*
PA	Yellow	
NY	Green	
VT	Green	
ME	Green	
NH	Green	
MA	Green	*
RI	Green	
CT	Green	
NJ	Green	#
DE	Green	*
MD	Green	*
VA	Yellow	*
NC	Green	*
SC	Green	*
GA	Green	*
FL	Green	
MS	Green	*
AL	Green	*
LA	Green	*
AR	Green	*
TX	White	*
OK	Green	*
MO	Green	
IL	Yellow	*
IN	Green	
MI	Green	#
OH	White	*
PA	Yellow	
NY	Green	
VT	Green	
ME	Green	
NH	Green	
MA	Green	*
RI	Green	
CT	Green	
NJ	Green	#
DE	Green	*
MD	Green	*
VA	Yellow	*
NC	Green	*
SC	Green	*
GA	Green	*
FL	Green	
MS	Green	*
AL	Green	*
LA	Green	*
AR	Green	*
TX	White	*
OK	Green	*
MO	Green	
IL	Yellow	*
IN	Green	
MI	Green	#
OH	White	*
PA	Yellow	
NY	Green	
VT	Green	
ME	Green	
NH	Green	
MA	Green	*
RI	Green	
CT	Green	
NJ	Green	#
DE	Green	*
MD	Green	*
VA	Yellow	*
NC	Green	*
SC	Green	*
GA	Green	*
FL	Green	
MS	Green	*
AL	Green	*
LA	Green	*
AR	Green	*
TX	White	*
OK	Green	*
MO	Green	
IL	Yellow	*
IN	Green	
MI	Green	#
OH	White	*
PA	Yellow	
NY	Green	
VT	Green	
ME	Green	
NH	Green	
MA	Green	*
RI	Green	
CT	Green	
NJ	Green	#
DE	Green	*
MD	Green	*
VA	Yellow	*
NC	Green	*
SC	Green	*
GA	Green	*
FL	Green	
MS	Green	*
AL	Green	*
LA	Green	*
AR	Green	*
TX	White	*
OK	Green	*
MO	Green	
IL	Yellow	*
IN	Green	
MI	Green	#
OH	White	*
PA	Yellow	
NY	Green	
VT	Green	
ME	Green	
NH	Green	
MA	Green	

10/15/2025