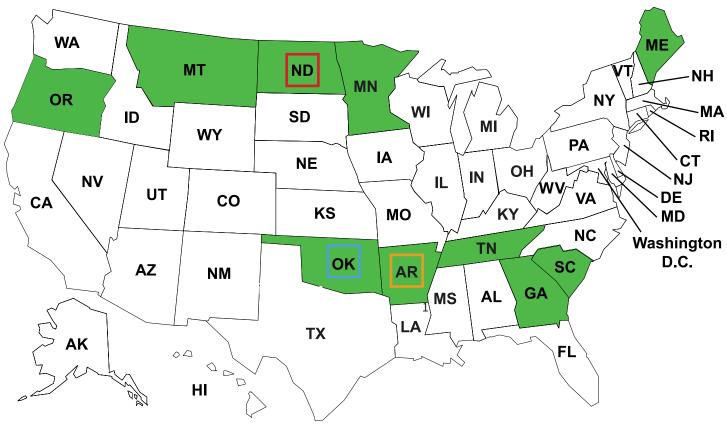
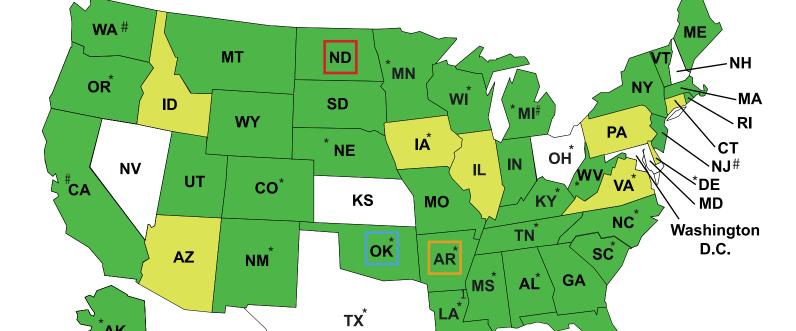


## Government Relations

## PBM State Licensure Law Comparison

2020





- 12 Meaningful PBM Licensure Laws
- 1 Legislation Upheld in Federal Court
- 1 Legislation Overturned in Federal Court of Appeals
- 1 Upheld by SCOTUS Case

37 Meaningful PBM Licensure Laws

Enforceable PBM State Regisration Law that is effectively Licensure

00

Law Upheld at Federal Appellate Level (2021)

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)

Licensure Law Provides Exemption for Self-Funded & / or Medicare Plans

3 State Insurance Department PBM Specific Online Complaint Form

QUESTIONS?

Email GovernmentRelations@ipcrx.com

10/15/2025