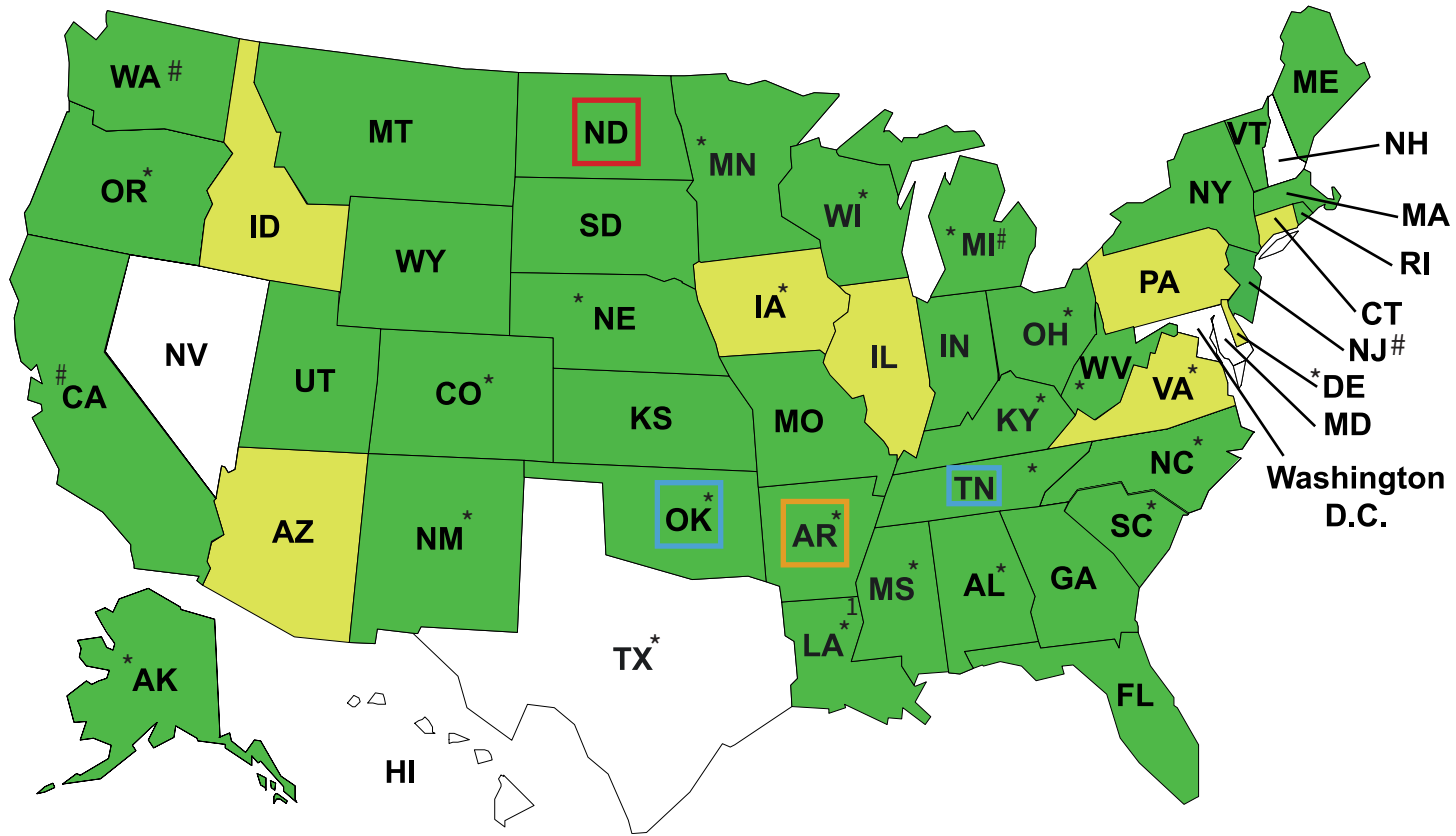




PBM State Licensure Laws 2026



37	Meaningful PBM Licensure Laws
8	Enforceable PBM State Registration Law that is effectively Licensure
1	Law Upheld at Federal Appellate Level (2021)
2	Law Application to ERISA & Part D Overturned by Fed Circuit Appellate Court, reversal appealed to SCOTUS (2023)
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

QUESTIONS?

Email GovernmentRelations@ipcrx.com

5/21/26