2026

STATE ADVOCACY PRIORITIES

These are the focus of NCPA's 2026 state advocacy priorities:

1. **Comprehensive PBM reform**
2. **PBM regulation enforcement**
3. **Medicaid managed care reform**

From comprehensive state-level PBM regulation to Medicaid managed care reform, NCPA is changing the pharmacy payment model. We are ready to assist our state partners with 2026 legislation and regulation that bring transparency, accountability, and fairness to community pharmacies.

1. Comprehensive PBM reform

- Commercial market reimbursement floor using NADAC plus state Medicaid fee-for-service professional dispensing fee
- Prohibit patient steering, requiring equal reimbursement to PBM-owned or affiliated pharmacies
- Fair pharmacy audits
- Prohibitions on retroactive claims reductions through clawbacks or effective rates
- Authority to decline to dispense when reimbursement is below cost

2. PBM regulation enforcement

- Authority clearly granted to appropriate state agency (e.g. Office of the Insurance Commissioner or Attorney General) to oversee and regulate PBMs
- Educate and advocate to regulator organizations (e.g. National Association of Insurance Commissioners or National Association of Attorneys General)
- Facilitate complaint processes for members to engage state agencies charged with oversight and enforcement

3. Medicaid managed care reform

- Pharmacy benefit carve-out from managed care to fee-for-service
- Rate floors in managed care based on fee-for-service rate methodology
- Single PBM programs

Emerging issues

- Drug pricing – upper payment limits, Maximum Fair Price, reference rates
- Compounding

NCPA Services Menu

1. Issue background
2. Bill review
3. Legislative strategy
4. Best practices
5. Letters of support or opposition
6. Legislative testimony
7. Bill negotiation
8. Grassroots calls to action

If you need assistance with any of the above, or with an issue not listed here, please contact a member of NCPA's state affairs team:

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NCPA® NATIONAL COMMUNITY PHARMACISTS ASSOCIATION

Founded in 1898, the National Community Pharmacists Association is the voice for the community pharmacist, representing over 18,900 pharmacies that employ more than 235,000 individuals nationwide. Community pharmacies are rooted in the communities where they are located and are among America's most accessible health care providers. To learn more, visit www.ncpa.org.