

PBM Regulatory Penalties — All 50 States

Pharmacy Benefit Manager regulations: spread pricing bans, rebate pass-through, fiduciary duties, and licensing enforcement.

Color-coded by maximum civil fine severity: **High** **Medium** **Low**

State	Tier	Law / Statute	Civil Fine	Key Provisions	Imprisonment
Alabama	Low	SB 252 (Community Pharmacy Relief)	\$1,000/violation	\$10.64 dispensing fee; ALDOI enforcement	N/A
Alaska	Low	SB 132/SB 134	\$2,500/violation	\$20K license required	N/A
Arizona	Low	SB 1102 / DIFI	\$1,000/violation	Cease-and-desist authority	4 months (Class 2 Misd.)
Arkansas	High	Act 624 (Ownership Ban)	\$1,000/violation/day	License revocation for ownership violations	N/A
California	High	SB 40 (Insulin cap)	\$35M historic (DMHC)	\$35/month insulin copay cap	6 months
Colorado	High	Insurance Commissioner	\$1,000/violation/day	Registration denial/revocation	N/A
Connecticut	High	Insurance Commissioner	\$100,000/violation	Fiduciary duty established Oct 2025	N/A
Delaware	Medium	Insurance Commissioner	\$10,000/violation	Authority revocation possible	N/A
Florida	High	FL Office of Insurance Reg.	\$10,000/violation/day	Spread pricing prohibited	N/A
Georgia	Medium	HB 690	\$10,000/act (willful)	Private right of action established	N/A
Hawaii	Medium	HB 2225	\$10,000/violation	Unfair/deceptive acts enforcement	N/A
Idaho	Low	ID Code § 41-349	Admin fines + license loss	Spread pricing ban; 100% rebate pass-through	N/A
Illinois	Low	Insurance Code	Regulatory action	Director of Insurance enforcement	N/A
Indiana	Medium	SB 140 / HB 1606	\$10,000 (3rd+ violation)	\$1K first; \$2.5K second; license suspension	N/A
Iowa	Low	SF 383	Admin penalties + license	Federal legal challenges ongoing	N/A
Kansas	High	SB 360	\$100,000 (unlicensed)	Strict licensing; cease-and-desist	N/A
Kentucky	Low	SB 188 / 201 KAR 2:416	\$500 (late renewal)	\$10K registration fee; DOI enforcement	N/A
Louisiana	Low	PBM Reform Act 2025	\$1,000/claim	Treble damages; enforcement fund	N/A
Maine	High	LD 1580	\$5,000/day (unlicensed) + \$500K	Spread pricing ban; \$500K market withdrawal penalty	<1 year
Maryland	Medium	SB 896	\$10,000/violation	\$1K/day carrier penalties; restitution	N/A
Massachusetts	High	Eff. Jan 2026	\$25,000 (false reporting) + \$5K/day	10% surcharge on unlicensed operations	N/A
Michigan	Medium	PA 11 of 2022	\$20,000/month (suspended)	License revocation; DIFS oversight	N/A
Minnesota	High	Dept. of Commerce	\$25,000/violation	\$10K/day unlicensed; fiduciary duty	N/A
Mississippi	High	HB 1672	\$25,000 (admin) + \$1K/day general	Board of Pharmacy enforcement	N/A
Missouri	High	SB 846/SB 363	\$5,000/violation/day	Probation up to 5 years; license revocation	N/A
Montana	Low	HB 740	Insurance code violations	Spread pricing ban; retroactive denial ban	N/A
Nebraska	Low	LB 198 (eff. Jan 2026)	\$1,000/entity/violation	Spread pricing ban; specialty pharmacy rights	N/A
Nevada	Low	Single State PBM	Admin fines + registration revocation	Spread pricing ban; transparency reports	N/A

State	Tier	Law / Statute	Civil Fine	Key Provisions	Imprisonment
New Hampshire	Medium	SB 478/SB 547 (proposed)	\$10,000/violation	Fiduciary duty; gag clause ban	Misd./Felony possible
New Jersey	High	S1300	\$10,000/day (non-compliance)	\$5K first; \$10K subsequent; gross receipts recovery	N/A
New Mexico	Medium	PBM Regulation Act	\$1,000–\$10,000/incident	Spread pricing ban; audit protections	N/A
New York	Low	DFS oversight	\$1,000–\$5,000/violation	License suspension/revocation	Perjury possible
North Carolina	Medium	Dept. of Insurance	\$500–\$50,000/violation	Spread pricing ban; rebate pass-through	N/A
North Dakota	Medium	HB 1584	\$10,000/vio (\$50K subsequent)	Enforcement fund; \$1M financial responsibility bond	5 years (Class C Felony)
Ohio	High	ORC 3959	\$1,000/violation/day	Superintendent license revocation	30 days (4th degree misd.)
Oklahoma	Low	Patient's Right to Pharmacy Choice	\$100–\$10,000/violation	License revocation; \$50K–\$500K surety bonds	N/A
Oregon	Medium	Insurance Code	\$10,000/violation	\$10K/day transparency reporting; cost growth	N/A
Pennsylvania	High	Act 77 of 2024	\$100,000/violation (\$1M/year cap)	\$50K unknown violations; \$500K/year cap	N/A
Rhode Island	Medium	S0222 / OHIC	\$10,000/violation	NADAC + dispensing fee minimum	N/A
South Carolina	Medium	SC Dept. of Insurance	\$10,000/violation	104% NADAC + dispensing fee; anti-steering	N/A
South Dakota	Low	SDCL 58-29E	License revocation + damages	Fee ban; anti-clawback; MAC list updates	N/A
Tennessee	Low	SB 881/HB 1244	\$250K cap removed — aggressive	TDCI consent orders; aggressive enforcement	N/A
Texas	Low	SB 1122/SB 1354	\$1,000–\$5,000	Pharmacy appeal rights; cost + dispensing fee	N/A
Utah	Low	HB 257	Admin fines	Spread pricing ban; drug synchronization	N/A
Vermont	High	DFR Licensure	\$100,000/violation	Spread pricing ban; gag clause ban	License revocation
Virginia	Medium	SCC Title 38.2	\$5,000/day	License revocation; private right of action	N/A
Washington	Low	RCW 48.200	\$5,000 (willful)	\$1K standard; OIC oversight	N/A
West Virginia	Medium	HB 3092 / OIC	\$20,000 (unlicensed) + \$10K/vio	100% rebate pass-through required	N/A
Wisconsin	Low	Cole's Act / SB 203	Admin fines + license revocation	Medicaid dispensing fee; gag clause ban	N/A
Wyoming	Low	WY PBM Act	\$1,000 (willful)	2-year audit lookback; patient choice	Misdemeanor

Source: TransformativeIP.ai · www.TransformativeIP.ai/state-penalties/pbm-table · © 2026 TransformativeIP