

April 7, 2026

Chairwoman Cynthia Roe
2300 N. Lincoln Blvd.
Room 205
Oklahoma City, OK 73105

Vice Chair Marilyn Stark
2300 N. Lincoln Blvd.
Room 341
Oklahoma City, OK 73105

Re: Support Critical PBM Reforms for Oklahomans

Chairwoman Roe, Vice Chair Stark, and members of the Oklahoma House Public Health Committee:

On behalf of our members operating in the state of Oklahoma, the National Association of Chain Drug Stores (NACDS) writes to express our support for bills enacting vital reform for pharmacy benefit managers (PBMs) – Senate Bills 2074, 1447, 1500, and 2007. We are proud to partner with the Oklahoma Pharmacy Association, a recognized national leader in advancing critical PBM reforms. Together these bills address longstanding challenges associated with PBM marketplace manipulation and ensure that Oklahomans retain reliable, convenient access to their trusted community pharmacies.

Community pharmacies are a critical component of the healthcare delivery system, particularly in rural and underserved areas, but they continue to face increasing financial pressure due to below-cost reimbursement, opaque contracting practices, and burdensome audit and fee structures. Pharmacy reimbursement should be comprised of two parts: 1) the product cost; and 2) a professional dispensing fee across payer markets to help ensure reasonable reimbursement and sustainable pharmacy services for beneficiaries. SB 2074 takes a critical step by requiring PBMs to pay the product cost, using the National Average Drug Acquisition Cost (NADAC) or Wholesale Acquisition Cost (WAC) benchmarks, and a dispensing fee that is no less than the fee paid under the state Medicaid fee-for-service. This requirement will undoubtedly help sustain pharmacy access across Oklahoma. Without meaningful reforms, many pharmacies will be unable to sustain operations, directly impacting patient access to medications and essential healthcare services.

These bills also take critical steps forward in enacting fair and transparent PBM practices which will be fundamental to a functional and sustainable marketplace. Key bill provisions are guardrails intended to ensure audits are fair and enforcement mechanisms are clearly defined which will help reduce administrative burden and ensure pharmacies are paid accurately and in a timely manner. Furthermore, the reforms listed within the bills that prevent anti-competitive practices and pharmacies from being subject to unclear or unfair terms will help keep pharmacy doors open and ensure Oklahoma residents can receive the care they deserve.

Collectively, these bills address key drivers of pharmacy instability: inadequate reimbursement, lack of transparency, and insufficient oversight. Establishing a clear reimbursement methodology, strengthening enforcement, and reforming audit practices will help create a more sustainable pharmacy healthcare setting for Oklahoma residents. Thus, NACDS strongly urges the Committee to advance SB2074, SB 1447, SB 1500, and SB 2007 as it will be a meaningful action towards protecting patients and supporting pharmacies.

Sincerely,



Steven C. Anderson, FASAE, CAE, IOM
President and Chief Executive Officer
National Association of Chain Drug Stores (NACDS)

CC:
Rep. Newton
Rep. Pogemiller
Rep. Sterling
Rep. West