LawPanels sample dataset — State PBM reform laws, 2015–2026

Version: 0.2 (sample) · **Built:** November 16, 2026 · **Coverage:** 50 states + DC, calendar years 2015–2026 · **Status:** research data, not legal advice.

Files

File	What it is
`pbm_laws_panel_wide.csv`	State-year panel (51 × 12 = 612 rows). One value column and one `_status` column per variable.
`pbm_laws_events_long.csv`	One row per state × variable (153 rows): in-force flag for 2026, first effective date, citation, enacting law, official source URL, cross-check tracker, verification status, notes.
`summary_stats.json`	Counts used in this codebook.
`codebook.md` / `codebook.pdf`	This document.

What changed in v0.2

- **Three spread-pricing bans that v0.1 coded 0 are in force:** Wyoming (since July 1, 2023), Kansas (2026 SB 20, July 1, 2026) and Tennessee (§ 56-7-3206(b); in force by 2024, start date not yet confirmed). None was coded as a ban in the tracker v0.1 relied on. Colorado enacted a ban that takes effect January 1, 2027 (coded 0 through 2026, like Louisiana).
- **All 31 remaining spread-ban zeros were rechecked** against state codes, session laws and current bills. They now carry the status `checked_none_found` instead of `unverified`.
- **PBM licensure/registration:** first effective dates are now confirmed from official sources for 35 of 42 jurisdictions with a requirement (up from 7).
- **Gag-clause bans** were recoded from statutes and session laws. 19 states are verified with operative dates; the variable is no longer "provisional".

Status values (every row and every panel cell carries one)

- `verified`: operative text and date confirmed in an official source (statute page, session law, enrolled bill, bill-status record or regulator notice); URL in `primary_source_url`.
- `checked_none_found` (spread_ban zeros only): a targeted search of the state's code, session laws and current bills (November 2026) found no in-force prohibition within scope. This is strong evidence but not proof of absence. Each row's note names what was found (for example, offer-only or Medicaid-only rules).
- `partial`: the statute text is confirmed in force, but the enacting law and start date are not. Only confirmed years are filled.
- `unverified`: tracker-sourced or not confirmed. These cells are left blank or flagged; they are never guessed.

Panel convention for license and gag variables: years on or after the verified first effective date are `verified` 1s. Years *before* it are coded 0 but marked `unverified`, because we confirmed the enacting law, not the absence of every earlier regime. For example, Vermont had PBM registration from 2007, which a current-law reading would miss.

Variable definitions and coding rules

`spread_ban` — prohibition of PBM spread pricing (state-regulated commercial plans)

- **1** if a state statute in force on or before December 31 of that year prohibits a PBM from charging a health plan more for a drug than it pays the pharmacy and keeping the difference. This includes functionally equivalent mandates: required pass-through pricing (Iowa), "same price" rules (Kansas), and bans on paying pharmacies less than the PBM–insurer contract price (Washington).
- **0** if no such prohibition is in force. Specifically coded 0: (a) laws that only require PBMs to *offer* a no-spread option, or that the plan can waive (CT, GA, UT, AL), or that apply only to government plans (GA, WV); (b) Medicaid-only bans (KY, NY, NV, OH, TX), which are out of scope; (c) bans enacted but not yet effective (LA and CO, effective 2027-01-01); (d) disclosure-only, reporting-only or pharmacy-reimbursement-floor rules (NJ, NC, OR, SD, MA, MD, IN, MT).
- **Judgment calls, flagged in notes:** Alabama's 2025 default ban that the plan can override (coded 0 under the waivable rule) and Montana's 2025 NADAC-based reimbursement mandate (coded 0, with no explicit plan-side prohibition). Users who prefer a broader

definition can recode both from the notes.
- **First effective date** is the *operative* date: the earliest date the prohibition can bind a covered contract.

`pbm_license` — PBM-specific licensure or registration required

- **1** if state law requires a PBM-specific license, certificate of authority or registration before acting as a PBM (including PBM-specific statutes that require registration as a TPA, such as Alaska's). **0** if PBMs are regulated only through general TPA licensing (IA, MA, NV, ND, OH, RI, SD, TX, per NAIC). DC is not covered and is blank.
- The date is when the requirement first binds. If a statute defers the requirement to a regulator deadline, that deadline is used (for example, Colorado's July 1, 2024), and notes record the act's effective date.

`gag_clause_ban` — state ban on pharmacy "gag clauses"

- **1** from the operative date of a statute barring PBMs or plans from prohibiting pharmacists from telling patients about cost share, cash price or cheaper alternatives. Where an act applies only to contracts entered into or renewed after a date, that date is used (KS, KY).
- States not listed by the 2018 tracker are 0 through 2018 (unverified) and blank from 2019 on, because post-2018 enactments were not researched. Federal law has banned gag clauses for most private plans since October 2018.

Method

1. **Candidates** came from AMCP's State PBM Law Inventory (May 2026), NAIC's PBM licensing chart (Nov. 2025), The Source on HealthCare (2018), state bill trackers and targeted web searches.
2. **Verification:** for each candidate we opened the official statute page, enrolled bill, session law, bill-status record or regulator notice. We confirmed the operative text and the effective date from the act's effective-date clause, the statute history note or the state's general effective-date rule. Where only the general rule was used, the note says so.
3. **Zero checks (spread_ban):** for each jurisdiction we searched the official code and session laws for spread-pricing terms and reviewed 2025–2026 bills to separate enacted laws from proposals.
4. **Coding** applied the written rules above by hand. AI tools were used for search, extraction and drafting, and every `verified` cell was checked against the source text.

Verification counts (v0.1 → v0.2)

Variable	Rows verified	Rows checked-none-found	Rows partial	Rows unverified	Panel cells verified	Panel cells checked-none-found	Panel cells unverified	Blank cells
spread_ban	16 → 19	0 → 31	0 → 1	35 → 0	192 → 231	0 → 372	420 → 9	0 → 9
pbm_license	7 → 35	—	—	44 → 16	84 → 275	—	528 → 337	362 → 82
gag_clause_ban	0 → 19	—	—	51 → 32	0 → 165	—	612 → 447	230 → 210

In force in 2026 (coded 1): spread_ban 18 (v0.1: 15); pbm_license 42; gag_clause_ban 27 known (lower bound).

Spread-ban adoption (jurisdictions with a ban in force at year-end): 2015: 0, 2016: 0, 2017: 0, 2018: 0, 2019: 1, 2020: 2, 2021: 3, 2022: 4, 2023: 6, 2024: 9, 2025: 12, 2026: 18.

Spread-pricing prohibitions (verified, including enacted-not-yet-effective)

State	In force 2026	First effective	Citation	Enacting law
AR	1	2019-07-24	Ark. Code Ann. § 23-92-505(c)	Acts 2019, No. 994, § 8 (SB 520)
VA	1	2020-10-01	Va. Code Ann. § 38.2-3467	2020 Va. Acts chs. 219, 1288 (HB 1290 / SB 251)
DE	1	2021-10-26	18 Del. C. § 3372A(1)	83 Del. Laws ch. 256 (HB 219)
OK	1	2022-04-21	36 Okla. Stat. § 6962	2022 SB 737 (emergency clause)
FL	1	2023-07-01	Fla. Stat. § 626.8825	Laws of Fla. ch. 2023-29, § 11 (SB 1550)
WY	1	2023-07-01	Wyo. Stat. § 26-52-105(a)(v)	2023 Wyo. Sess. Laws (SF0151)
MI	1	2024-01-01	Mich. Comp. Laws § 550.827(6)	2022 Mich. Pub. Acts 11

State	In force 2026	First effective	Citation	Enacting law
VT	1	2024-07-01	18 V.S.A. § 3612(f)	2023 Vt. Acts & Resolves No. 127 (Adj. Sess.) (H.233)
AK	1	2025-01-01	Alaska Stat. § 21.36.520	2024 Alaska Sess. Laws ch. 61 (HB 226)
ID	1	2025-01-01	Idaho Code § 41-349	2024 Idaho Sess. Laws (H 596)
IA	1	2025-07-01	Iowa Code § 510B.8D	2025 Iowa Acts ch. 151, § 6 (SF 383)
CA	1	2026-01-01	Cal. Health & Safety Code § 1385.0031; Cal. Ins. Code § 10123.2045	2025 Cal. Stat. ch. 605 (SB 41)
IL	1	2026-01-01	215 ILCS 5/513b1(f-5)	Ill. Pub. Act 104-0027 (HB 1697)
ME	1	2026-01-01	24-A M.R.S. § 4350-F	P.L. 2025, ch. 291 (LD 1580)
NE	1	2026-01-01	Neb. Rev. Stat. § 44-4617	Laws 2025, LB 198, § 8
WA	1	2026-01-01	Wash. Rev. Code § 48.200.310(1)(a)	2024 Wash. Sess. Laws ch. 242, § 7
KS	1	2026-07-01	Kansas Consumer Prescription Protection and Accountability Act, SB 20 § (b)(1) (K.S.A. 40-38xx)	2026 Kan. Sess. Laws ch. 81 (SB 20)
CO	0	2027-01-01	Colo. Rev. Stat. § 10-16-122.8	2025 Colo. Sess. Laws ch. 303 (HB25-1094)
LA	0	2027-01-01	La. R.S. 22:1867	2025 La. Acts No. 474 (HB 264)

Partial: **TN**, Tenn. Code Ann. § 56-7-3206(b). In force by 2024 per an official Tennessee fiscal memorandum; start date unverified.

PBM licensure / registration: verified first effective dates

State	In force 2026	First effective	Citation	Enacting law
KS	1	2006-04-27	K.S.A. § 40-3823	2006 Kan. Sess. Laws ch. 154 (SB 547)
VT	1	2007 (Act 80 § 9)	Vt. Stat. Ann. tit. 18, § 9421 Vt. Stat. Ann. tit. 18, § 3611	2007 Vt. Acts No. 80, § 9
GA	1	2011-01-15	O.C.G.A. § 33-64-2	2010 Ga. Laws Act 549 (SB 310)
MS	1	2011-04-26	Miss. Code Ann. § 73-21-157	Laws 2011, ch. 546, § 31
OR	1	2014-01-01	Or. Rev. Stat. § 735.532	Or. Laws 2013, ch. 570 (HB 2123)
NM	1	2014-05-21	N.M. Stat. Ann. § 59A-61-3	Laws 2014, ch. 14 (HB 126)
WA	1	2014-06-12	Wash. Rev. Code Ann. § 48.200.030	2014 Wash. Sess. Laws ch. 213, § 2 (ESSB 6137)
WY	1	2016-07-01	Wyo. Stat. § 26-52-101	2016 Wyo. Sess. Laws ch. 90 (HB 0035)
KY	1	2016-07-15	KRS § 304.9-053	2016 Ky. Acts ch. 79, § 2
PA	1	2017-02-19	Pa. Stat. Ann. tit. 40, § 4521	Act of Nov. 21, 2016, P.L. 1318, No. 169
HI	1	2017-07-01	HRS § 431S-3	2017 Haw. Sess. Laws Act 44 (HB 1444)
AR	1	2018-03-15	A.C.A. § 23-92-504	Acts 2018 (2nd Ex. Sess.), No. 1 (HB 1010), emergency clause; approved Mar. 15, 2018
FL	1	2019-01-01	Fla. Stat. § 624.490 Fla. Stat. § 626.8805	Laws of Fla. ch. 2018-91, § 3
AK	1	2019-07-01	AS § 21.27.010* *Effective 1/1/2026	SLA 2018, ch. 100 (HB 240), § 5
UT	1	2019-07-01	Utah Code Ann. § 31A-46-201	2019 Utah Laws ch. 241 (H.B. 370)
CA	1	2020-01-01	Cal.Health & Safety Code §§ 1385.003 to 1385.005	Stats. 2018, ch. 905 (AB 315)
ME	1	2020-01-01	24-A M.R.S. § 4348	P.L. 2019, ch. 469, § 8
MN	1	2020-01-01	Minn. Stat, § 62W.03	2019 Minn. Laws ch. 39, § 3
NH	1	2020-01-01	N.H. Rev. Stat. § 402- N:2	2019 N.H. Laws ch. 320, § 2
DE	1	2020-06-01	18 Del.C. § 3353A	82 Del. Laws c. 115 (HB 194)
ID	1	2020-07-01	Idaho Code § 41-349	2020 Idaho Sess. Laws ch. 117 (H 386)
LA	1	2020-07-01	La. R.S. § 40:2867 La. R.S. § 22:2865 P La. R.S. § 40:2867	2019 La. Acts No. 124 (SB 41)

State	In force 2026	First effective	Citation	Enacting law
MO	1	2020-08-28	Mo. Rev. Stat. § 376.393	2020 Mo. Laws H.B. 1682
VA	1	2020-10-01	Va. Code Ann. § 38.2-3466. Administrative Letter 2020-04	2020 Va. Acts chs. 219, 1288
SC	1	2021-01-01	S.C. Code Ann. § 38-71-2210	2019 S.C. Acts No. 48 (S. 359)
NC	1	2021-10-01	N.C. Gen. Stat. Ann. § 58-56A-2(a)	S.L. 2021-161, § 1(b)
MT	1	2022-01-01	M.C.A. 33-2-2403(1)	2021 Mont. Laws ch. 501, § 3
WI	1	2022-01-01	Wis. Stat. Ann. § 632.865(3)	2021 Wis. Act 9
NY	1	2022-06-01	N.Y. Ins. Law § 2905 N.Y. Ins. Law § 2906	N.Y. Ins. Law art. 29 (§§ 2903, 2905)
NE	1	2023-01-01	Neb.Rev.St. § 44-4605	Laws 2022, LB 767
MI	1	2024-01-01	M.C.L.A. 550.821	2022 Mich. Pub. Acts 11
CO	1	2024-07-01	C.R.S.A. § 10-16-122.1	2023 Colo. Sess. Laws ch. 160 (HB23-1227)
AZ	1	2025-01-01	A.R.S. § 20-3333	Laws 2023, ch. 74 (SB 1382)
NJ	1	2025-01-01	N.J.S.A. 17B:27F-1.1	P.L. 2023, c. 107
MD	1	on or before 2008-10-01	Md. Code Ann. § 15- 1604	2008 Md. Laws ch. 201 (SB 722) amended an existing registration requirement

Still unverified (requirement in force per NAIC; date not confirmed):

- **AL**: In force per NAIC chart (Nov. 2025): License--PBM. First effective date not verified: Act 2019-457 (SB 73): sources conflict on whether licensing applied from enactment (2019) or Jan. 1, 2020; enrolled act not opened.
- **CT**: In force per NAIC chart (Nov. 2025): Register--PBM. First effective date not verified: Statute history (unofficial reproduction): P.A. 07-200, § 2, effective Jan. 1, 2008; official CGA history page not retrieved. In force per CGA OLR report 2026-R-0011.
- **DC**: District of Columbia is not covered by the NAIC chart; not researched in this sample.
- **IL**: In force per NAIC chart (Nov. 2025): Register--PBM. First effective date not verified: P.A. 101-452 added 215 ILCS 5/513b2 (secondary sources: registration from July 1, 2020); ilga.gov unreachable during build.
- **IN**: In force per NAIC chart (Nov. 2025): License--PBM. First effective date not verified: P.L. 68-2020 (SEA 241) added IC 27-1-24.5-18; secondary sources give July 1, 2021; IDOI opened licensing June 2023. Operative date unresolved.
- **IA**: PBMs regulated through third-party-administrator licensing (Certificate--TPA), not a PBM-specific license/registration -> coded 0 by rule. Status per NAIC chart (Nov. 2025); not independently verified.
- **MA**: PBMs regulated through third-party-administrator licensing (Register—TPA), not a PBM-specific license/registration -> coded 0 by rule. Status per NAIC chart (Nov. 2025); not independently verified.
- **NV**: PBMs regulated through third-party-administrator licensing (License--TPA), not a PBM-specific license/registration -> coded 0 by rule. Status per NAIC chart (Nov. 2025); not independently verified.
- **ND**: PBMs regulated through third-party-administrator licensing (Register--TPA), not a PBM-specific license/registration -> coded 0 by rule. Status per NAIC chart (Nov. 2025); not independently verified.
- **OH**: PBMs regulated through third-party-administrator licensing (License--TPA), not a PBM-specific license/registration -> coded 0 by rule. Status per NAIC chart (Nov. 2025); not independently verified.
- **OK**: In force per NAIC chart (Nov. 2025): License--PBM. First effective date not verified: 59 O.S. § 358 licensure; enactment/effective date not confirmed from session law.
- **RI**: PBMs regulated through third-party-administrator licensing (Certificate--TPA), not a PBM-specific license/registration -> coded 0 by rule. Status per NAIC chart (Nov. 2025); not independently verified.
- **SD**: PBMs regulated through third-party-administrator licensing (License--TPA), not a PBM-specific license/registration -> coded 0 by rule. Status per NAIC chart (Nov. 2025); not independently verified.
- **TN**: In force per NAIC chart (Nov. 2025): License--PBM. First effective date not verified: Introduced HB 1857 (2018) text: licensing effective Jan. 1, 2019 (July 1, 2018 for applications); enacted public chapter not retrieved (tnsosfiles blocked).
- **TX**: PBMs regulated through third-party-administrator licensing (Certificate--TPA), not a PBM-specific license/registration -> coded 0 by rule. Status per NAIC chart (Nov. 2025); not independently verified.
- **WV**: In force per NAIC chart (Nov. 2025): License--PBM. First effective date not verified: 2019 SB 489 (effective from passage Feb. 26, 2019) added § 33-51-8, but licensing operative only after the implementing rule (OIC cites Oct. 1, 2020). Operative date unresolved.

Gag-clause bans: verified operative dates

State	In force 2026	First effective	Citation	Enacting law
GA	1	2017-07-01	O.C.G.A. § 33-64-11	2017 Ga. Laws (SB 103)
ND	1	2017-08-01	N.D.C.C. § 19-02.1-16.1(7)	2017 N.D. Laws (SB 2258)
NC	1	2017-10-01	N.C. Gen. Stat. § 58-56A-3	S.L. 2017-116 (HB 466)
AK	1	2018	AS 08.80.297(b)	SLA 2018, ch. 100 (HB 240), § 1
SC	1	2018-05-03	S.C. Code § 38-71-2150	2018 S.C. Acts No. 177 (H. 5038)
UT	1	2018-05-08	Utah Code § 58-17b-626	2018 Utah Laws (S.B. 208)
WV	1	2018-06-08	W. Va. Code § 33-51-9	2018 W. Va. Acts ch. 123 (SB 46)
FL	1	2018-07-01	Fla. Stat. §§ 465.0244, 624.490	Laws of Fla. ch. 2018-91 (HB 351)
MS	1	2018-07-01	Miss. Code §§ 73-21-201 to -205	Laws 2018, ch. 331 (HB 709)
VT	1	2018-07-01	18 V.S.A. § 9473(b)(5)	2018 Vt. Acts No. 193 (S.92), § 11
LA	1	2018-08-01	La. R.S. 22:1657 (as amended); R.S. 37:1219	2018 La. Acts No. 317 (SB 241)
AZ	1	2018-08-03	A.R.S. § 44-1752	Laws 2018, ch. 133 (HB 2107)
CO	1	2018-08-08	C.R.S. § 10-16-122.7	2018 Colo. Sess. Laws ch. 181 (HB18-1284)
DE	1	2018-08-28	18 Del. C. § 3332A	81 Del. Laws c. 378 (HB 425)
MO	1	2018-08-28	RSMo § 376.387	2018 Mo. Laws S.B. 826
MD	1	2018-10-01	Md. Code, Ins. § 15-1611	2018 Md. Laws ch. 218 (SB 576)
KS	1	2019-01-01	K.S.A. 40-3831	2018 Kan. Sess. Laws (SB 351)
KY	1	2019-01-01	KRS 304.17A-162	2018 Ky. Acts ch. 144 (HB 463)
TX	1	2025-09-01	Tex. Ins. Code § 4151.155	2025 Tex. Gen. Laws (SB 493)

Enacted per tracker, date not confirmed from an official source:

- **AR**: Act 1 of 2018 (2nd Ex. Sess.), Ark. Code § 23-92-507 (emergency clause, Mar. 15, 2018) extends existing prohibitions in § 23-99-407, whose original enactment date was not traced.
- **CA**: AB 315 (Stats. 2018, ch. 905), Bus. & Prof. Code § 4079.5: contracts entered into on/after Jan. 1, 2019 (official text not retrieved).
- **CT**: P.A. 17-241: secondary sources say gag provision effective Jan. 1, 2018 (official act PDF not retrieved).
- **IN**: HEA 1317 (P.L. 209-2018): secondary sources say effective July 1, 2018 (iga.in.gov requires JavaScript).
- **ME**: P.L. 2017, ch. 44 (LD 6), 24-A M.R.S. § 4317(13): likely Nov. 1, 2017 general effective date (official PDF not retrieved).
- **NH**: 2018 N.H. Laws ch. 164 (HB 1791), RSA 420-J:8, XVI: secondary sources say Jan. 1, 2019.
- **SD**: 2018 S.D. Sess. Laws ch. 281 (SB 141), SDCL 58-29E-8.1: likely July 1, 2018 general effective date (official page requires JavaScript).
- **VA**: 2018 Va. Acts ch. 245 (HB 1177/SB 933), § 38.2-3407.15:4: effective July 1, 2018; applies to contracts on/after Jan. 1, 2019 (official LIS page not retrieved).

Discrepancies found between trackers and primary sources

- **Missed spread bans:** Wyoming (2023 SF0151, § 26-52-105(a)(v)) and Tennessee (§ 56-7-3206(b)) prohibit spread pricing but were not coded as bans in the tracker v0.1 used. Kansas's 2026 ban was enacted after that tracker's May 2026 edition.
- **Arkansas spread ban:** a tracker cites § 23-92-505 as "(2024)". The prohibition dates from Act 994 of 2019, effective July 24, 2019.
- **Vermont licensure:** the NAIC chart reads like a 2024 license regime, but PBM registration under 18 V.S.A. § 9421 dates from 2007 (Act 80).
- **Maryland registration** predates 2008. The 2008 act amends an existing requirement.
- **Louisiana gag clause:** the 2016 act sometimes cited (Act 527, R.S. 22:1060.6) caps patient payments and is not a gag-clause ban. The ban is Act 317 of 2018 (effective August 1, 2018).
- **Texas gag clause:** a 2018 tracker lists SB 1076 (2012). The PBM gag-clause ban we could confirm is SB 493, effective September 1, 2025.
- **Florida licensure:** NAIC labels it a license. The statute shows registration first (January 1, 2019), later a certificate of authority.

What remains unverified, and why

- **pbm_license dates (16 rows):** 7 states where the official enrolled act or code history could not be retrieved or sources conflict (AL, CT, IL, IN, OK, TN, WV). Also the 8 TPA-only zeros (taken from NAIC) and DC (not covered).
- **gag_clause_ban:** 8 tracker states whose official text could not be retrieved (blocked or JavaScript-only legislature sites). Also every state not on the 2018 tracker from 2019 on (post-2018 enactments, such as Alabama's 2019 act, were not researched).
- **spread_ban:** Tennessee's start date. Zeros are `checked_none_found`, not proven absences.

Known limitations

- Effective dates are coded at the statute level. Rules, guidance and injunctions are noted but not coded (for example, the Iowa injunction).
- ERISA preemption limits how these laws apply to self-funded employer plans. The variables code what the statute says, not whom it reaches.
- Repeals and sunsets are noted (for example, Maine § 4350-F repeals January 1, 2031). None fall inside 2015–2026.

Error reporting

Found an error? Email **rmt834@gmail.com** with the state, variable, cell and a link to the official source. Confirmed corrections are logged in a public changelog with date and source. Version numbers increase with each correction release.

License and suggested citation

The free sample (both CSV files and this codebook, v0.2) is licensed under the Creative Commons Attribution 4.0 International License (CC BY 4.0): https://creativecommons.org/licenses/by/4.0/. You may copy, share and adapt it, including for commercial use, if you give appropriate credit, link to the license, and indicate if you made changes. The license file is `LICENSE.txt` in the download folder.

Suggested citation:

> LawPanels (2026). State PBM Reform Laws Panel, v0.2. https://lawpanels.com

© 2026 LawPanels. Site content, codebook and dataset coding © LawPanels. All rights reserved except as licensed above. Commissioned datasets are licensed separately under the terms in each order.

Sources

Compiled from official state statutes, session laws, enrolled bills and regulator notices published by state governments. The text of state statutes and session laws is in the public domain. Third-party trackers (NAIC, AMCP and others) were used only to find candidate laws; they are cited, not copied. No headnotes, annotations or other editorial content from commercial legal publishers is reproduced.

Disclaimer

Research data, not legal advice. Using this dataset does not create an attorney-client relationship. The dataset describes what statutes say, coded under the rules above; it does not tell you your legal obligations. Verify any provision against the official source and consult counsel before relying on it.