



2026 LEGISLATIVE AND REGULATORY PRIORITIES AND POSITIONS

The Tennessee Pharmacists Association's Public Affairs Committee and Board of Directors established the following priorities and positions for 2026.

STATE LEGISLATIVE PRIORITY	DESCRIPTION
PHARMACY BENEFIT MANAGER (PBM) REFORM: PROCEDURAL & STRUCTURAL CHANGES	Legislation is needed to prevent pharmacy benefit managers (PBMs) from owning their own pharmacies, building on the model established by Arkansas in 2025. When PBMs both administer pharmacy networks and own pharmacies, they create an unfair competitive advantage that results in patient steerage, limiting patients' ability to use their pharmacy of choice. This vertical integration also fuels harmful white-bagging policies, where patients are forced to obtain medications through PBM-owned pharmacies rather than locally accessible pharmacy providers, disrupting continuity of care. By prohibiting PBM ownership of pharmacies, Tennessee can strengthen protections for patients, support the pharmacies that patients choose to use, and ensure that healthcare decisions remain patient-centered rather than profit-driven. In addition, legislation must update 2022's Public Chapter 1070 to guarantee that all pharmacies are eligible for a dispensing fee that mimics TennCare's current model, which is determined through a transparent, survey-based process. This update would address long-standing reimbursement inequities for all pharmacies while reinforcing the importance of fair and sustainable payment for pharmacy services. Additional policies must also close loopholes that allow PBMs to use off-setting tactics, such as modifying other contracts to negate the intent of state law. To support accountability, TPA will also work to establish an efficient, low-burden process for pharmacies to file complaints against PBMs, ensuring compliance while minimizing administrative strain on pharmacy operations.



STATE LEGISLATIVE POSITION	DESCRIPTION
TAX FAIRNESS WITH SPECIALTY MEDICATIONS SB 907 (Haile) / HB 767 (Hicks, G.)	Pharmacies dispensing high-cost specialty medications face a disproportionate TN business tax burden given that this tax is on total revenue, instead of profit. Even if a TN pharmacy runs a loss, they are required to pay this burdensome revenue tax. Specialty pharmacy reimbursements often leave a very small margin or more often drive the margin underwater after drug acquisition costs. Current tax procedures fail to reflect these realities, straining pharmacies and threatening patient access to critical therapies. Legislation aims to provide some relief by exempting from the TN business tax the sale of prescription drugs that exceed the Medicare Part D specialty cost threshold for the 2026 plan year, as determined by CMS. The legislation will reduce financial pressure and support pharmacies serving patients with these vital specialty medications. TPA is committed to working with stakeholders to advance this reform.
PROVISION OF VACCINES IN TENNESSEE	Vaccines remain one of the most successful public health interventions in recorded history. Pharmacists and pharmacies play a vital role in the distribution and administration of vaccines, and pharmacists—among the most accessible healthcare providers—possess extensive training and expertise in medication therapy. TPA is deeply committed to improving public health through pharmacist-provided patient care services. Therefore, TPA will vigorously and publicly promote and advocate for the use of vaccines to prevent unnecessary illness and death among Tennessee residents, especially children. TPA will advocate for the expansion of pharmacist and pharmacy involvement in the provision of all vaccines.
340B DRUG PRICING PROGRAM PROTECTIONS	Ongoing advocacy is essential to protect and strengthen the 340B drug pricing program, which supports safety net providers and ensures access to affordable medications for vulnerable populations. Despite progress made in 2025, drug manufacturers continue imposing restrictions that undermine the program’s intent and limit patient care. Continued engagement with policymakers is necessary to defend 340B, preserve its integrity, and sustain healthcare access for underserved communities.
PHARMACISTS ROLE IN MEDICATIONS FOR OPIOID USE DISORDER	Pharmacists play a key role in pain management by optimizing therapies, monitoring treatment, educating patients, and identifying addiction signs. While Congress removed the federal X-waiver barrier for prescribing medications for opioid use disorder (MOUD), state laws still limit pharmacists’ roles. TPA will advocate for expanded pharmacist involvement to improve MOUD access.



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STATE REGULATORY POSITION	DESCRIPTION
MODERNIZATION OF COLLABORATIVE PRACTICE AGREEMENT REGULATIONS	While Tennessee pharmacists can enter into formal collaborative pharmacy practice agreements (CPPA), current regulations are more restrictive than the legislation that enacted them. In collaboration with the Tennessee Medical Association, TPA will advocate to regulatory boards to modernize regulations to meet evolving pharmacy practice needs and maximize pharmacists' expertise within a CPPA on an interprofessional healthcare team.
ESTABLISHMENT OF RULES ON TECHNICIAN PRODUCT VERIFICATION	Supporting the Board of Pharmacy in establishing rules on technician product verification is critical to advancing pharmacy practice and patient care. The pilot project shows trained technicians can safely and effectively verify products, freeing up pharmacists to focus on direct patient care and clinical services. Making this model permanent ensures consistency, sustainability, and broader adoption, improving workflow efficiency, expanding access to pharmacist-provided care, and maintaining patient safety.

