TENNESSEE PHARMACISTS ASSOCIATION

2027 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 2027.

STATE LEGISLATIVE PRIORITY	DESCRIPTION
PHARMACISTS ROLE IN MEDICATIONS FOR OPIOID USE DISORDER	Tennessee continues to grapple with the impact of the opioid epidemic. As a member of the interprofessional healthcare team, pharmacists already ensure that patients can access and use their medication for opioid use disorder appropriately. Considering Congress recently eliminated the X-waiver, an important federal barrier to pharmacists prescribing medications for opioid use disorder (MOUD), states are positioned to expand pharmacists' roles in OUD. With Tennessee state law limiting the role of pharmacists in managing MOUDs, however, TPA will advocate expanded authority of pharmacists' scope of practice to improve access to MOUDs.
GOVERNOR'S RURAL HEALTH TRANSFORMATION PROGRAM: STANDARD OF CARE	TPA stands ready to work collaboratively with the Governor's Office to advance key healthcare priorities, including the Rural Health Transformation Program and the utilization of a standard-of-care regulatory framework for the practice of pharmacy. This effort can strengthen healthcare access and address provider shortages and burnout, particularly in rural and underserved communities across Tennessee.

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2027 LEGISLATIVE AND REGULATORY PRIORITIES AND POSITIONS (CONT.)

STATE LEGISLATIVE POSITION	DESCRIPTION
TAX FAIRNESS WITH SPECIALTY MEDICATIONS	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 2027 plan year, as determined by CMS. The legislation will reduce financial pressure and support pharmacies serving patients with these vital specialty medications.
PROTECT AND ENFORCE STATE-LEVEL PBM REFORMS	TPA supports strong enforcement and protection of Tennessee's pharmacy benefit manager (PBM) reform laws, which have improved transparency, promoted fair pharmacy reimbursement, and protected patient access to care. TPA believes these hard-fought reforms must be defended against litigation and other efforts to weaken or bypass state law. The association will continue to advocate for the Tennessee Department of Commerce and Insurance and the Tennessee Attorney General to vigorously enforce existing statutes and hold violators accountable. Preserving these protections is essential to safeguarding pharmacy practice and ensuring patients across Tennessee maintain access to pharmacy services.
ENFORCEMENT OF STATE-LEVEL 340B DRUG PRICING PROGRAM PROTECTIONS	TPA will continue to advocate with state regulators for consistent enforcement of existing Tennessee law to preserve and strengthen the 340B Drug Pricing Program, which is essential to supporting safety-net providers and expanding access to care for vulnerable patient populations. While important progress was made in 2025, ongoing efforts by some drug manufacturers to impose restrictions on 340B participation threaten the program's effectiveness and the patients it serves. TPA believes robust regulatory enforcement is critical to maintaining the integrity of the 340B program, protecting provider access to discounted medications, and ensuring underserved communities continue to receive needed healthcare services.

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2027 LEGISLATIVE AND REGULATORY PRIORITIES AND POSITIONS (CONT.)

STATE LEGISLATIVE POSITION	DESCRIPTION
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.
THE PRACTICE OF PHARMACY COMPOUNDING	TPA recognizes that compounding of medications has provided significant benefits to Tennessee patients, physicians, and the broader health care system by ensuring access to individualized therapies and allowing physicians to prescribe the medications they believe are most appropriate for their patients. TPA opposes unnecessary legislative restrictions that could limit patient access to compounded medications or undermine the Board of Pharmacy's authority to regulate the practice safely and effectively.

STATE REGULATORY POSITION	DESCRIPTION
MODERNIZATION OF BOARD OF PHARMACY REGULATIONS, INCLUDING COLLABORATIVE PHARMACY PRACTICE AGREEMENTS	TPA supports the ongoing review and modernization of pharmacy regulations being conducted by the Tennessee Board of Pharmacy. As the Board evaluates its current rules, TPA will work collaboratively with key partners and other stakeholders to ensure regulations governing Collaborative Pharmacy Practice Agreements (CPPAs) align with legislative intent and reflect contemporary pharmacy practice. TPA will advocate for a regulatory framework that fully leverages pharmacists' education and expertise as members of interprofessional healthcare teams while maintaining appropriate patient safety safeguards. This modernization will help expand access to care and improve health outcomes for Tennessee patients.

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