

For H.353, an act relating to pharmacy benefit management, the Board would like to make a clarification regarding PBM registration requirements and request a change to the bill.

In addition to DFR licensing, all pharmacy benefit managers are subject to a separate requirement to register and report data to the Vermont Health Care Uniform Reporting and Evaluation System (VHCURES) under 18 VSA 9410 and GMCB rules. The VHCURES registration and reporting requirements exist currently and will continue to exist if the PBM licensing bill is passed as introduced. The VHCURES registration requirement applies to all PBMs in Vermont, including any that might not be required to be licensed with DFR.

The Board requests that in the licensing requirements (either in statute, rule, or DFR application process), PBMs be required to confirm that they have also completed VHCURES registration and are reporting to VHCURES as required under 18 VSA 9410 and GMCB Rule 8.000.

Thank you and please reach out if you have any questions.