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ALL PLAN LETTER

DATE: September 3, 2026

TO: All Health Care Service Plans

FROM: Jenny Phillips
Deputy Director, Office of Plan Licensing

SUBJECT: APL 26-014 – Contracted Pharmacy Benefit Manager Information

The Department of Managed Health Care (DMHC) issues this All Plan Letter (APL) to remind health care service plans (plans) of the licensure requirement for pharmacy benefit managers (PBMs)¹ as required by Assembly Bill 116 (Committee on Budget, Ch. 21, Stats. 2025), Senate Bill 41 (Wiener, Ch. 605, Stats. 2025)² and DMHC All Licensee Letter 26-010 (ALL 26-010). Plans must ensure all contracted PBMs are licensed prior to January 1, 2027.³

Filing Requirements:

On or before October 1, 2026, plans must submit a filing via eFiling as a Report/Other titled “Contracted PBMs and Pharmacy Delegations.” The filing shall include, at a minimum, an Exhibit E-1 which includes the following information:

- The name of each currently contracted PBM or PBM in which a contract will be in effect January 1, 2027;
- The delegated functions for each listed PBM;
- A statement indicating whether or not the plan intends to continue contracting with the listed PBM beyond January 1, 2027; and

¹ Pharmacy benefit manager as defined under Health and Safety Code section 1385.001(t).

² All further statutory references (unless otherwise noted) are to sections of the California Health and Safety Code, and all regulatory references (unless otherwise noted) are to sections of California Code of Regulations, title 28.

³ Sections 1385.004(a)(2) and 1385.008.

- Whether the Plan has confirmed each contracted PBM has submitted an application for licensure with the Department.

If you have any questions regarding the Pharmacy Benefit Manager Licensure Checklist contained in [ALL 26-010](#) or this All Plan Letter, please contact the Office of Plan Licensing through your assigned reviewer.