

Regulatory Notice

PBM Regulations by State

National and State Level Regulatory Requirements Specific to Pharmacy Benefit Management

State: Michigan

Last Updated: 10/21/2026

Applicable Rule(s)

MCL § 550.821, enacted under the Pharmacy Benefit Manager Licensure and Regulation Act (Act 11 of 2022), governs the licensing and oversight of Pharmacy Benefit Managers operating in the State of Michigan. The statute dictates that a person or business entity may not perform acts or do business as a PBM in Michigan without a valid, nontransferable license issued by the Michigan Department of Insurance and Financial Services (DIFS). In addition to a PBM license, Michigan requires PBM applicants to also hold a valid Third Party Administrator (TPA) Certificate of Authority.

Compliance Statement

The Pharmacy Benefit Manager maintains the required Michigan Pharmacy Benefit Manager license pursuant to MCL § 550.821 and maintains the license through the applicable biennial renewal process. The organization ensures ongoing regulatory compliance by filing significant modifications within 30 days, submitting the annual April 1 transparency report, and maintaining administrative procedures strictly aligned with Michigan's prohibitions against spread pricing and anti-steering practices.