

2026 Legislative & Regulatory Updates

Christopher W Crank, PharmD, MS, BCPS, FASHP

Executive Vice President

Illinois Council of Health-System Pharmacists

Loves Park, Illinois



2026 ICHP Annual Meeting

Conflict of Interest

- Neither I nor my spouse have conflicts of interest with ineligible companies to disclose



Pharmacist and Technician Learning Objectives

- Describe the rule making process in Illinois.
- Review the 2026 legislative and regulatory updates for pharmacy practice in Illinois.



2026 ICHP Annual Meeting

(225 ILCS 85/)

Illinois Pharmacy Practice Act

- Set to be repealed
 - **January 1, 2028**
- <https://www.ilga.gov/LEGISLATION/ILCS/ilcs3.asp?ActID=1318&ChapterID=24>



2026 ICHP Annual Meeting

 Translate

Select General Assembly

Search 104th General Assembly


ILGA.GOV

LEGISLATION & LAWS

REPORTS & INQUIRY

RULES & REGULATIONS

SENATE

HOUSE

LOG IN

Home / Legislation / Illinois Compiled Statutes / -

PROFESSIONS, OCCUPATIONS, AND BUSINESS OPERATIONS (225 ILCS 85/) Pharmacy Practice Act.

[Back to Act Listing](#)

[By Act Name](#)
[Printer Friendly](#)

Illinois Compiled Statutes (ILCS)

Updating the database of the Illinois Compiled Statutes (ILCS) is an ongoing process. Recent laws may not yet be included in the ILCS database, but they are found on this site as [Public Acts](#) soon after they become law. For information concerning the relationship between statutes and Public Acts, refer to the [Guide](#).

Because the statute database is maintained primarily for legislative drafting purposes, statutory changes are sometimes included in the statute database before they take effect. If the source note at the end of a Section of the statutes includes a Public Act that has not yet taken effect, the version of the law that is currently in effect may have already been removed from the database and you should refer to that Public Act to see the changes made to the current law.



2026 ICHP Annual Meeting

Administrative Rules

- **PART 1330 PHARMACY PRACTICE ACT**

- Illinois Register:

- Volume 48, Issue 3 (January 19, 2024)
 - Updated rules for Nonresident Pharmacies and Out of State Pharmacist-in-Charge
 - Not enforced until March 2026
- Volume 50, Issue 3 (January 16, 2026)
 - Updates to rules for Pharmacy Practice Act
- Volume 50, Issue 5 (January 30, 2026)
 - Updates to rules for the Controlled Substances Act



2026 ICHP Annual Meeting

ADMINISTRATIVE CODE

Home / Administrative Code / TITLE 68: PROFESSIONS AND OCCUPATIONS / CHAPTER VII: DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION

TITLE 68: PROFESSIONS AND OCCUPATIONS
CHAPTER VII: DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
SUBCHAPTER b: PROFESSIONS AND OCCUPATIONS
PART 1330 PHARMACY PRACTICE ACT

[View Entire Part](#)

SUBPART A: GENERAL PROVISIONS

Section 1330.10 Definitions

Section 1330.20 Fees

Section 1330.30 Unprofessional and Unethical Conduct

Section 1330.40 Violations

Section 1330.50 Vaccinations/Immunizations

Section 1330.60 Internet Pharmacies



2026 ICHP Annual Meeting

Rule Making in Illinois

- When State agencies wish to adopt or change rules that affect anyone outside the agency itself, they must follow certain rulemaking procedures outlined in the Illinois Administrative Procedure Act (IAPA) [5 ILCS 100]
 - <https://www.ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=Illinois%20Administrative%20Procedure%20Act.&ActID=83&ChapterID=2&ChapAct=5+ILCS+100%2F&SeqStart=100000&SeqEnd=210000>



2026 ICHP Annual Meeting

Rule Making Process in Illinois

- Language for proposed rules is drafted by State agencies
 - Law typically determines what State agency has oversight
 - Pharmacy Practice Act
 - Proposed rule written by IDFPR
 - IDFPR Associate General Counsel
 - IDFPR Director of Drug Compliance
 - Illinois State Board of Pharmacy
 - Illinois Council of Health-System Pharmacists
 - Illinois Pharmacists Association
 - Illinois Retail Merchants Association
 - Public



Rule Making Process in Illinois

- First Notice
 - Begins when proposed rules are first published in the Illinois Register
 - State agency proposing the rules must accept public comments for a period of no less than 45 days
 - Comment period often goes longer than 45 days
 - Takes feedback and incorporates changes into the proposed rules
 - Hearings may be required if further discussion is warranted
 - JCAR involved in the process



2026 ICHP Annual Meeting

Rule Making Process in Illinois

- Second Notice
 - State agency files second notice documentation when rules are ready to submit
 - Includes a summary of the
 - Rules and changes made to rules from first notice
 - Impact on State finances
 - Economic impact on regulated parties
 - Public comments
 - JCAR formally reviews the rules and takes action



2026 ICHP Annual Meeting

Rule Making Process in Illinois

- Joint Committee on Administrative Rules
 - 12 legislators
 - 3 Republican Senators
 - 3 Republican Representatives
 - 3 Democrat Senators
 - 3 Democrat Representatives



2026 ICHP Annual Meeting

How to Track Proposed/New Rules

- The Illinois Register
 - <https://www.ilsos.gov/departments/index/register.html>
- The Flinn Report
 - <https://www.ilga.gov/agencies/jcar/flinn>



2026 ICHP Annual Meeting




ILLINOIS SECRETARY of STATE
ALEXI GIANNOULIAS

Driver's Licenses & ID Cards

Vehicles, Plates & Titles

Business Services

More Services

[Home](#) > ... > [Index](#) > Illinois Register

Illinois Register

2026, Volume 50

- [Issue 1 – January 2, 2026 – Pages 1–266](#)
- [Issue 2 – January 9, 2026 – Pages 267–524](#)
- [Issue 3 – January 16, 2026 – Pages 525–950](#)
- [Issue 4 – January 23, 2026 – Pages 951–1,355](#)
- [Issue 5 – January 30, 2026 – Pages 1,356–1,694](#)
- [Issue 6 – February 6, 2026 – Pages 1,695–1,996](#)
- [Issue 7 – February 13, 2026 – Pages 1,997–2,212](#)
- [Issue 8 – February 20, 2026 – Pages 2,213–2,530](#)
- [Issue 9 – February 27, 2026 – Pages 2,531–3,549](#)
- [Issue 10 – March 6, 2026 – Pages 3,550–3,952](#)
- [Issue 11 – March 13, 2026 – Pages 3,953–4,204](#)
- [Issue 12 – March 20, 2026 – Pages 4,205–4,571](#)
- [Issue 13 – March 27, 2026 – Pages 4,572–4,842](#)
- [Issue 27 – July 6, 2026 – Pages 8,812–9,076](#)
- [Issue 28 – July 10, 2026 – Pages 9,077–9,649](#)
- [Issue 29 – July 17, 2026 – Pages 9,650–10,757](#)
- [Issue 30 – July 24, 2026 – Pages 10,758–11,030](#)
- [Issue 31 – July 31, 2026 – Pages 11,031–11,253](#)
- [Issue 32 – August 7, 2026 – Pages 11,254–11,503](#)
- [Issue 33 – August 14, 2026 – Pages 11,504–12,009](#)

Past Issues of the Illinois Register



2026 ICHP Annual Meeting

15

Assessment Question 1

Which section of the rules addresses Administration of Tests and Therapeutics?



Assessment Question 2

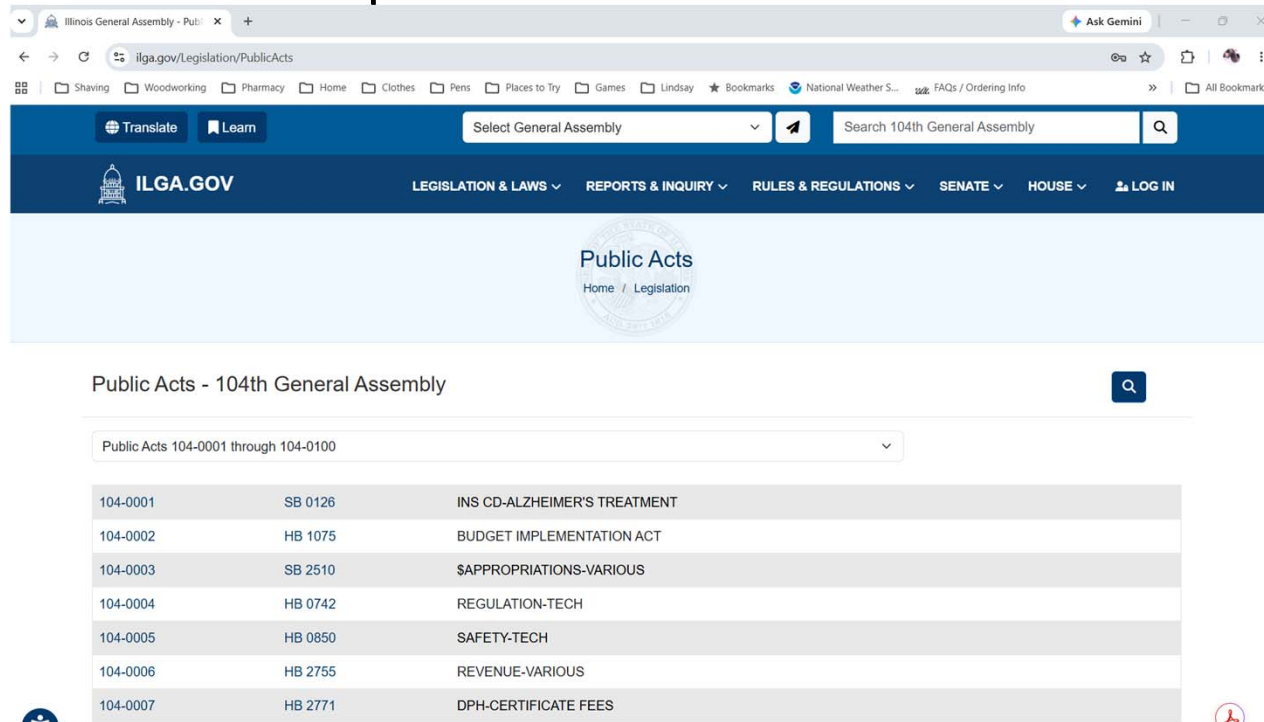
When are proposed rules **officially** open to public comment?

- A. Before first notice
- B. During first notice
- C. During second notice
- D. Public comment is not permitted



2026 ICHP Annual Meeting

How to Look Up Public Acts



The screenshot shows the ILGA.GOV website. The header includes a navigation bar with links for Translate, Learn, and a search bar. Below the header, the main content area is titled "Public Acts" and "Public Acts - 104th General Assembly". A dropdown menu shows "Public Acts 104-0001 through 104-0100". Below this, a table lists the first seven public acts of the 104th General Assembly.

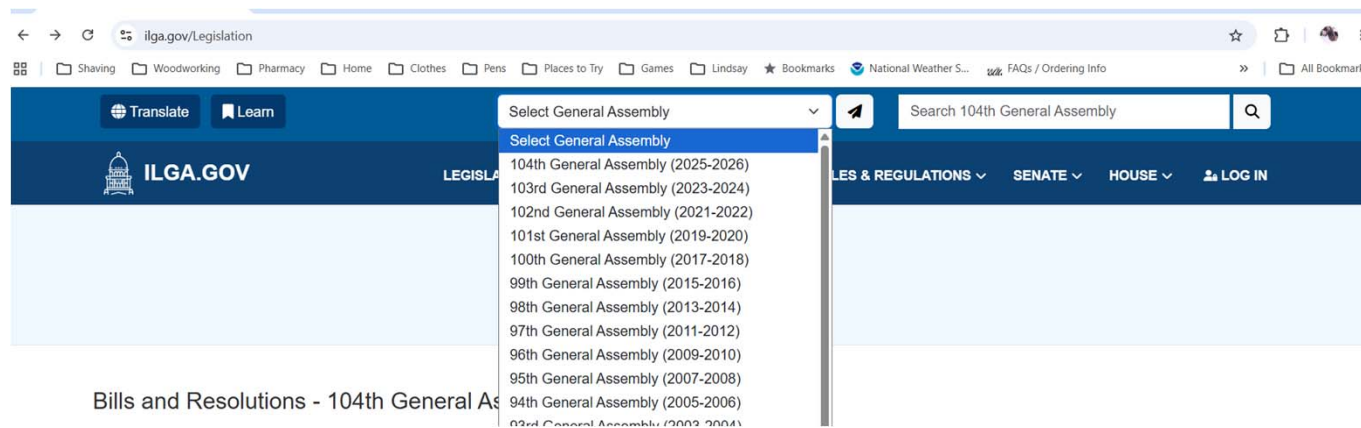
Public Act Number	Bill Number	Bill Title
104-0001	SB 0126	INS CD-ALZHEIMER'S TREATMENT
104-0002	HB 1075	BUDGET IMPLEMENTATION ACT
104-0003	SB 2510	\$APPROPRIATIONS-VARIOUS
104-0004	HB 0742	REGULATION-TECH
104-0005	HB 0850	SAFETY-TECH
104-0006	HB 2755	REVENUE-VARIOUS
104-0007	HB 2771	DPH-CERTIFICATE FEES



2026 ICHP Annual Meeting

How to Look Up Proposed Legislation

- Current Session (104th General Assembly)
 - <http://www.ilga.gov/legislation/>
- Previous Sessions



2026 ICHP Annual Meeting



ILGA.GOV

LEGISLATION & LAWS ▾

REPORTS & INQUIRY ▾

RULES & REGULATIONS ▾

SENATE ▾

HOUSE ▾

LOG IN

Bills and Resolutions

[Home](#) / [Legislation](#)


Bills and Resolutions - 104th General Assembly

Senate Bills

0001 - 0100	0101 - 0200	0201 - 0300	0301 - 0400	0401 - 0500	0501 - 0600	0601 - 0700
0701 - 0800	0801 - 0900	0901 - 1000	1001 - 1100	1101 - 1200	1201 - 1300	1301 - 1400
1401 - 1500	1501 - 1600	1601 - 1700	1701 - 1800	1801 - 1900	1901 - 2000	2001 - 2100
2101 - 2200	2201 - 2300	2301 - 2400	2401 - 2500	2501 - 2600	2601 - 2671	

House Bills

0001 - 0100	0101 - 0200	0201 - 0300	0301 - 0400	0401 - 0500	0501 - 0600	0601 - 0700
0701 - 0800	0801 - 0900	0901 - 1000	1001 - 1100	1101 - 1200	1201 - 1300	1301 - 1400
1401 - 1500	1501 - 1600	1601 - 1700	1701 - 1800	1801 - 1900	1901 - 2000	2001 - 2100
2101 - 2200	2201 - 2300	2301 - 2400	2401 - 2500	2501 - 2600	2601 - 2700	2701 - 2800
2801 - 2900	2901 - 3000	3001 - 3100	3101 - 3200	3201 - 3300	3301 - 3400	3401 - 3500
3501 - 3600	3601 - 3700	3701 - 3800	3801 - 3900	3901 - 4000	4001 - 4100	4101 - 4150

Senate Resolutions

0001 - 0100	0101 - 0200	0201 - 0300	0301 - 0355
-------------	-------------	-------------	-------------

House Resolutions

0001 - 0100	0101 - 0200	0201 - 0300	0301 - 0400	0401 - 0494
-------------	-------------	-------------	-------------	-------------



2026 ICHP Annual Meeting

 Translate

Select General Assembly 



Search 104th General Assembly (2025-2026) 

 **ILGA.GOV**

LEGISLATION & LAWS  REPORTS & INQUIRY  RULES & REGULATIONS  SENATE  HOUSE   LOG IN



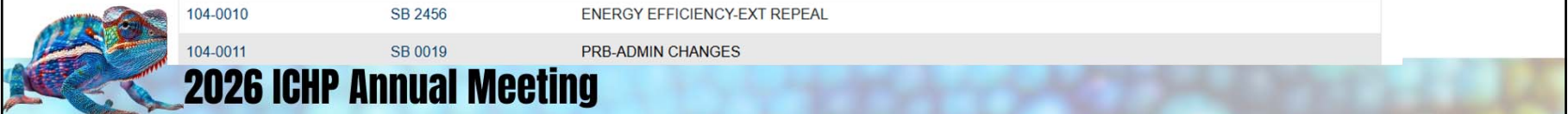
Public Acts

Home / Legislation

Public Acts - 104th General Assembly (2025-2026)

Public Acts 104-0001 through 104-0100 

104-0001	SB 0126	INS CD-ALZHEIMER'S TREATMENT
104-0002	HB 1075	BUDGET IMPLEMENTATION ACT
104-0003	SB 2510	\$APPROPRIATIONS-VARIOUS
104-0004	HB 0742	REGULATION-TECH
104-0005	HB 0850	SAFETY-TECH
104-0006	HB 2755	REVENUE-VARIOUS
104-0007	HB 2771	DPH-CERTIFICATE FEES
104-0008	HB 3374	BOND AUTHORIZATION ACT
104-0009	SB 2437	MEDICAID-MATERNAL HLTH-DOULAS
104-0010	SB 2456	ENERGY EFFICIENCY-EXT REPEAL
104-0011	SB 0019	PRB-ADMIN CHANGES



104th Illinois General Assembly



2026 ICHP Annual Meeting

104th General Assembly

- Senate: 40 Democrats | 19 Republicans
- House: 77 Democrats | 40 Republicans
- Democrats have Super Majority in both chambers
- Bills filed
 - Senate 4,212
 - House 5,807
- Usually monitoring over 300 bills/resolutions
- January 2025 – January 2027

10,019



2026 ICHP Annual Meeting

2026 Public Acts



2026 ICHP Annual Meeting

Public Act 104-0461 (HB4154) – Pharmacist Application/Exam

- **Legislators:** Rep. Natalie Manley (House); Sen. David Koehler (Senate)
 - Eliminates the IL MPJE law exam requirement for pharmacist licensure
 - Requires an Illinois-specific law education module to be completed prior to licensure
 - Speeds exam result reporting (within 2 weeks)
 - Adds CE requirement for maintaining a pharmacist license
 - Minimum 2 hours in pharmacy law with each renewal

<https://ilga.gov/Documents/Legislation/PublicActs/104/PDF/104-0461.pdf>



2026 ICHP Annual Meeting

Public Act 104-0530 (SB3223) – Practice of Pharmacy (Medication Recalls)

- **Legislators:** Sen. Doris Turner; Rep. Mary Gill
 - Requires pharmacies to post QR code for medication recall notifications
 - Expands pharmacist responsibility in recall awareness
 - Intent is that this applies to prescriptions not medication orders within a health system

<https://ilga.gov/legislation/PublicActs/View/104-0530>



2026 ICHP Annual Meeting

Public Act 104-0535 (HB4834) – Controlled Substances (Testosterone & Others)

- **Legislators:** Rep. Kelly Cassidy; Sen. Adriane Johnson
 - Prescription Monitoring Program does not apply to testosterone, mifepristone, misoprostol, GnRH analogues, or estrogen
 - Requires deletion of existing testosterone PMP data by Jan 1, 2027
 - Reduces pharmacist PMP review requirements for affected medications

<https://ilga.gov/legislation/PublicActs/View/104-0535>



Public Act 104-0679 (HB4793) – Pharmacist Dispensing Ability

- **Legislators:** Rep. Rick Ryan; Sen. David Koehler
 - Allows pharmacists to add missing devices/DME to prescriptions such as pen needles and chambers for inhalers
 - Supports clinical judgment to improve therapeutic outcomes
 - Requires documentation of all modifications

<https://ilga.gov/legislation/PublicActs/View/104-0679>



2026 ICHP Annual Meeting

Public Act 104-0691 (HB4982) – Pharmacies 9-8-8 Information

- **Legislators:** Rep. Jackie Haas; Sen. Erica Harriss
 - Requires pharmacies to post suicide/crisis hotline signage
 - Provides that every licensed pharmacy directly serving patients at a physical location shall conspicuously post a sign provided by the Department of Human Services
 - (i) a statement that a Suicide and Crisis Lifeline is available
 - (ii) the 9-8-8 Suicide and Crisis Lifeline number
 - (iii) any other awareness and assistance information the Department of Human Services deems appropriate
 - Mandates inclusion of informational materials with prescriptions (for non-retail pharmacies)
 - Adds operational compliance requirements at point of sale

<https://ilga.gov/legislation/PublicActs/View/104-0691>



2026 ICHP Annual Meeting

Public Act 104-0729 (SB3487) – Hospital Vaccination Policy

- **Legislators:** Sen. Laura Fine; Rep. Tracy Katz Muhl
 - Expands hospital vaccination protocols across broader patient populations
 - Aligns vaccination timing with public health guidance

<https://ilga.gov/legislation/PublicActs/View/104-0729>



2026 ICHP Annual Meeting

Public Act 104-0758 (HB2371) – Patient Access to Pharmacy Protection Act (340B)

- **Legislators:** Rep. Anna Moeller (House); Sen. David Koehler (Senate)
 - Prohibits manufacturers from restricting or interfering with 340B drug access or delivery to covered entities and contract pharmacies
 - Prevents limiting access to 340B drugs and prohibits manufacturers from requiring information/data from covered entities not required by federal law
 - Protects ability of 340B entities to contract with multiple pharmacies
 - Creates enforceable violations with penalties per transaction

<https://ilga.gov/Legislation/PublicActs/View/104-0758>



2026 ICHP Annual Meeting

Public Act 104-0758 (HB2371) – Patient Access to Pharmacy Protection Act (340B) (cont.)

- **Legislators:** Rep. Anna Moeller (House); Sen. David Koehler (Senate)
 - Requires reporting and oversight, increasing compliance responsibilities for 340B pharmacies
 - Strengthens legal protections for contract pharmacy models

<https://ilga.gov/Legislation/PublicActs/View/104-0758>



2026 ICHP Annual Meeting

Public Act 104-0769 (HB4327) – 340B Transparency, Reporting, and Accountability Act

- **Legislators:** Rep. Camille Lilly; Sen. David Koehler
 - The intent of the 340B Drug Discount Program is to provide resources to reach more eligible patients and provide more comprehensive services.
 - Congress intended the 340B Drug Discount Program to provide discounts to 340B covered entities that provide direct health care to uninsured and underinsured vulnerable patients
 - Requires statewide study of 340B program participation and financial impact by the Department of Insurance
 - Imposes reporting obligations on covered entities and manufacturers

<https://ilga.gov/Legislation/PublicActs/View/104-0769>



2026 ICHP Annual Meeting

Other Public Acts

- **Public Act 104-0508 (HB4977)** – Epidemiological Pathogens
- **Public Act 104-0682 (SB2886)** – Genetic Info Privacy-Biomarker
- **Public Act 104-0745 (SB3896)** – Virtual Wholesale Drug Distributors
- **Public Act 104-0762 (HB3454)** – Epinephrine Delivery Device
- **Public Act 104-0781 (HB4953)** – Drug Distribution Restrictions



2026 ICHP Annual Meeting

Passed Both Chambers



2026 ICHP Annual Meeting

SB3213 – Electronic Prescriptions / Transfers

- **Legislators:** Sen. Steve McClure; Rep. Kelly Cassidy
 - Allows one-time transfer of Schedule II–V prescriptions
 - Requires pharmacies to transfer prescriptions upon patient request (with exceptions)
 - Permits technician-assisted transfers under pharmacist delegation
 - Expands patient access and pharmacy interoperability

<https://ilga.gov/legislation/BillStatus?DocNum=3213&GAID=18&DocTypeID=SB&LegID=165914&SessionID=114>



2026 ICHP Annual Meeting

Three-Pronged Approach to Advocacy

- The Individual
- The Organization
- The Lobbyist



2026 ICHP Annual Meeting

ICHP Activities

- PBM Reform Monitoring
- Copay Maximizers
- White-bagging and Brown-bagging
- Standard of Care
- Provider Status and Reimbursement
- Updating Rules



2026 ICHP Annual Meeting

Assessment Question 3

What topic does Public Act 104-0758 address?

- A. PBM Reform
- B. White-Bagging
- C. 340b Protections
- D. Technician Practice



2026 ICHP Annual Meeting

Assessment Question 4

Public Act 104-0461 (HB4154) – Pharmacist Application/Exam does which of the following

- A. Eliminates the MPJE as a requirement for pharmacist licensure in Illinois
- B. Requires an Illinois-specific law education module to be completed prior to licensure
- C. Requires a minimum of 2 hours of CE on pharmacy law with each license renewal
- D. All of the above



2026 ICHP Annual Meeting



David Koehler (D)

Assistant Majority Leader

Elected November 2006, Appointed December 2006 -

Present

46th District

ICHP Legislator of the Year Awards



Anna Moeller (D)

Representative

March 2014 - Present

43rd District

ICHP Amicus Pharmacia Award Winner

Cyrus Winnett

Chief Public Affairs Officer
IPHCA



2026 ICHP Annual Meeting

2026 Legislative & Regulatory Updates

Christopher W Crank, PharmD, MS, BCPS, FASHP

Executive Vice President

Illinois Council of Health-System Pharmacists

Loves Park, Illinois



2026 ICHP Annual Meeting