

2026 Legislative & Regulatory Updates

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Conflict of Interest

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



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Pharmacist and Technician Learning Objectives

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



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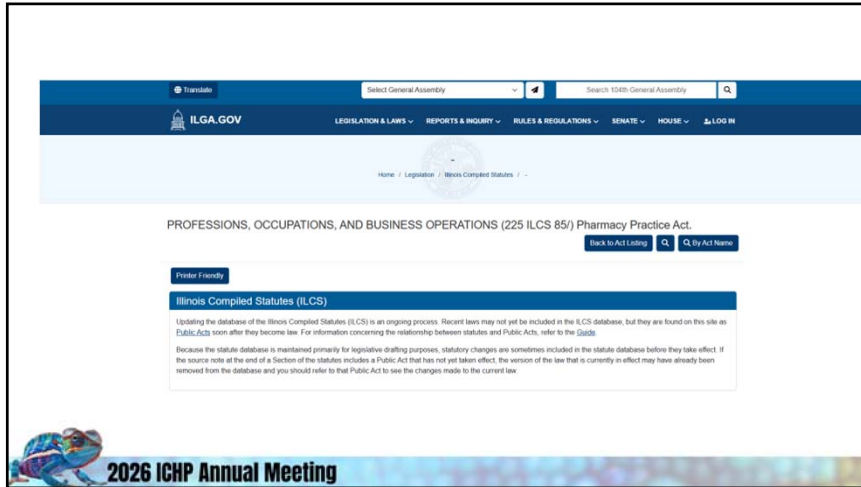
(225 ILCS 85/) Illinois Pharmacy Practice Act

- Set to be repealed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



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The screenshot shows the ILGA.GOV website. The header includes a search bar, a dropdown for "Select General Assembly", and a "Search 108th General Assembly" button. The main navigation bar lists "LEGISLATION & LAWS", "REPORTS & INQUIRY", "RULES & REGULATIONS", "SENATE", "HOUSE", and "LOG IN". The breadcrumb trail reads "Home / Legislation / Illinois Compiled Statutes /". The page title is "PROFESSIONS, OCCUPATIONS, AND BUSINESS OPERATIONS (225 ILCS 85/) Pharmacy Practice Act.". Below the title are buttons for "Print Friendly", "Back to Act List", and "By Act Name". The main content area is titled "Illinois Compiled Statutes (ILCS)" and contains a disclaimer about the database's purpose and the relationship between statutes and public acts.

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Administrative Rules

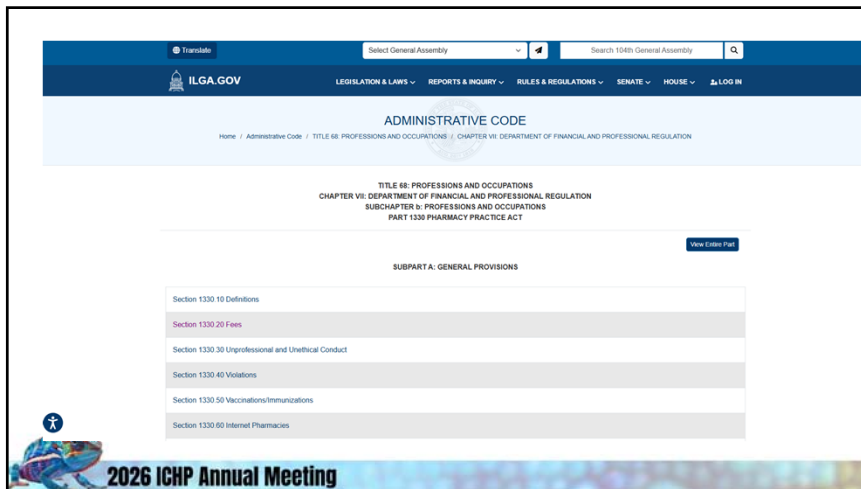
• PART 1330 PHARMACY PRACTICE ACT

• 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



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The screenshot shows the ILGA.GOV website's Administrative Code section. The breadcrumb trail reads "Home / Administrative Code / TITLE 68: PROFESSIONS AND OCCUPATIONS / CHAPTER VII: DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION". The page title is "ADMINISTRATIVE CODE". Below the title, the hierarchy is shown: "TITLE 68: PROFESSIONS AND OCCUPATIONS", "CHAPTER VII: DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION", "SUBCHAPTER B: PROFESSIONS AND OCCUPATIONS", and "PART 1330 PHARMACY PRACTICE ACT". A "View Entire Part" button is present. The section "SUBPART A: GENERAL PROVISIONS" is expanded, showing a list of sections: "Section 1330.10 Definitions", "Section 1330.20 Fees", "Section 1330.30 Unprofessional and Unethical Conduct", "Section 1330.40 Violations", "Section 1330.50 Vaccinations/Immunizations", and "Section 1330.60 Internet Pharmacies".

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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>



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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



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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



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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



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Rule Making Process in Illinois

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



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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/icar/flinn>



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ILLINOIS SECRETARY OF STATE
ALEXI GIANNOLIAS

Home > > Index > Illinois Register

Illinois Register 2026, Volume 50

Past Issues of the Illinois Register

- 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 951-1355
- Issue 5 - January 30, 2026 - Pages 1356-1694
- Issue 6 - February 6, 2026 - Pages 1695-1996
- Issue 7 - February 13, 2026 - Pages 1997-2312
- Issue 8 - February 20, 2026 - Pages 2313-2530
- Issue 9 - February 27, 2026 - Pages 2531-3049
- Issue 10 - March 6, 2026 - Pages 3050-3952
- Issue 11 - March 13, 2026 - Pages 3953-4204
- Issue 12 - March 20, 2026 - Pages 4205-4671
- Issue 13 - March 27, 2026 - Pages 4672-4842
- Issue 27 - July 6, 2026 - Pages 8,812-9,076
- Issue 28 - July 13, 2026 - Pages 9,077-9,649
- Issue 29 - July 20, 2026 - Pages 9,650-10,757
- Issue 30 - July 27, 2026 - Pages 10,758-11,030
- Issue 31 - August 3, 2026 - Pages 11,031-11,253
- Issue 32 - August 10, 2026 - Pages 11,254-11,503
- Issue 33 - August 17, 2026 - Pages 11,504-12,009

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ILGA.GOV

LEGISLATION & LAWS | REPORTS & INQUIRY | RULES & REGULATIONS | SENATE | HOUSE | LOGIN

Joint Committee on Administrative Rules

Home / Joint Committee on Administrative Rules

Joint Committee on Administrative Rules

- JCAR Home
- Administrative Code
- Illinois Register
- Meeting Agenda
- Meeting Minutes
- Second Notices
- Flinn Report
- Emergency Rules
- FOIA
- Members
- Illinois Rulemaking Process
- Annual Report

FLINN REPORT

See Months of the Flinn Report will be kept on this page for viewing

February 6, 2026 - Issue 6
January 30, 2026 - Issue 5
January 23, 2026 - Issue 4
January 16, 2026 - Issue 3
January 9, 2026 - Issue 2
January 2, 2026 - Issue 1
December 26, 2025 - Issue 52
December 19, 2025 - Issue 51
December 12, 2025 - Issue 50
December 5, 2025 - Issue 49
December 1, 2025 - Issue 48
November 21, 2025 - Issue 47

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Assessment Question 1

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



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Assessment Question 2

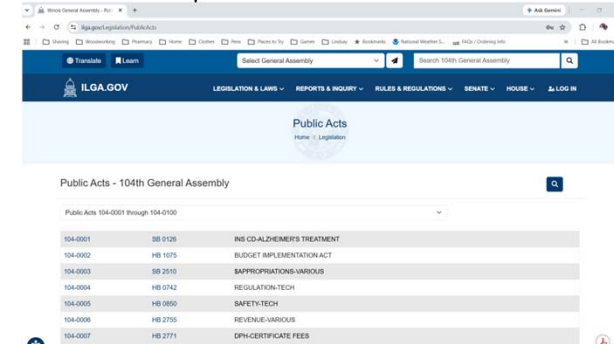
When are proposed rules **officially** open to public comment?

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



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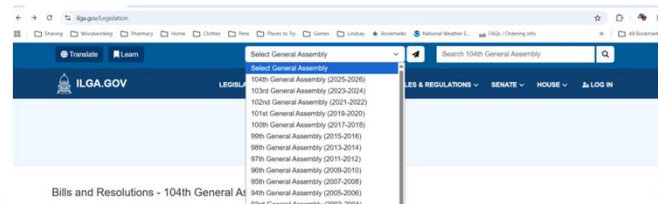
How to Look Up Public Acts



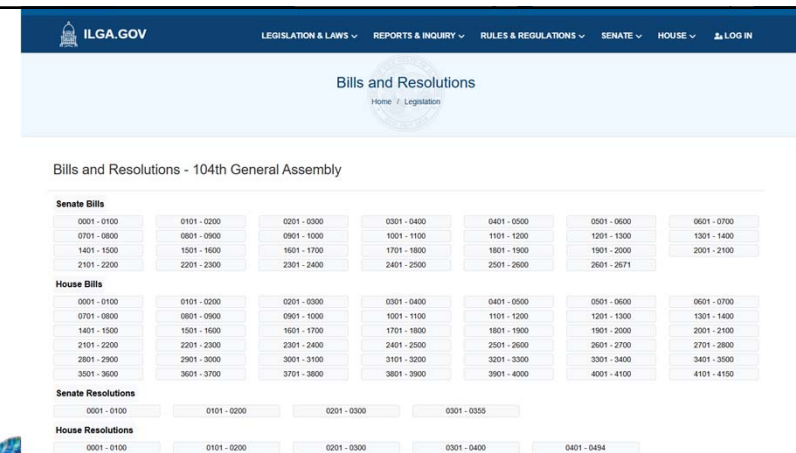
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How to Look Up Proposed Legislation

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



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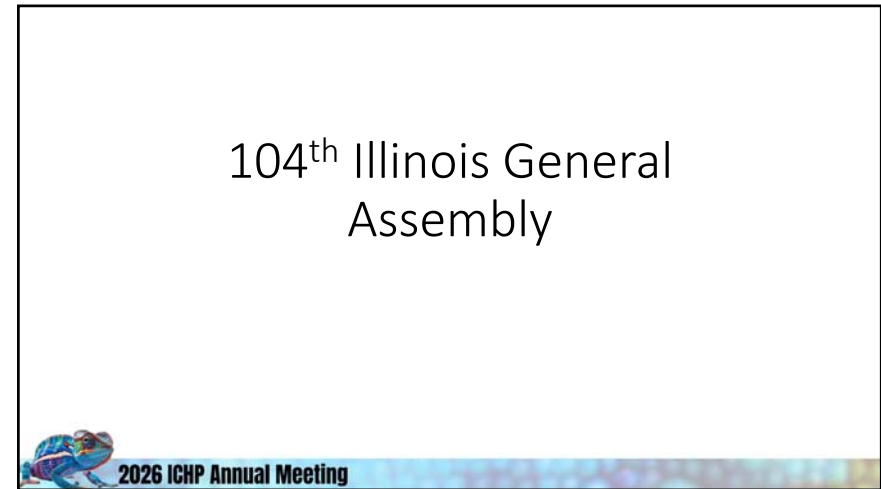


Public Acts - 104th General Assembly (2025-2026)

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	SAPPROPRIATIONS-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

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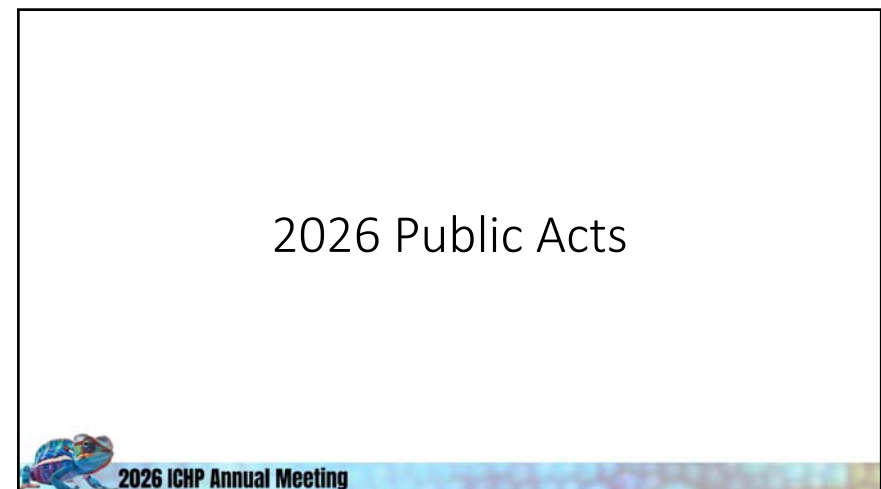


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104th General Assembly

- 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

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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>



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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>



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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>



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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>



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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>



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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>



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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>



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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>



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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>



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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



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Passed Both Chambers



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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>



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Three-Pronged Approach to Advocacy

- The Individual
- The Organization
- The Lobbyist



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ICHP Activities

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



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Assessment Question 3

What topic does Public Act 104-0758 address?

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



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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



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**ICHP
Legislator
of the Year
Awards**



David Koehler (D)
Assistant Majority Leader
Elected November 2006, Appointed December 2006 - Present
46th District

Anna Moeller (D)
Representative
March 2014 - Present
43rd District

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ICHP Amicus Pharmacia
Award Winner



Cyrus Winnett
Chief Public Affairs Officer
IPHCA

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2026 Legislative &
Regulatory Updates

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