As of February 10, 2026

SF 383 PBM REFORM:

Key Wins, What's Next, and How Legislators Can Help

SF 383 signed **June 11, 2025** (effective **July 1, 2025**). Injunctions issued **July 21, 2025** (ABI) and **October 30, 2025** (Wellmark).

Key Wins

- SF 383 is law. It establishes guardrails against patient steering and discriminatory PBM practices and strengthens pharmacy network fairness.
- SF 383 creates reimbursement standards and transparency tools intended to address below-cost payment and contract practices.
- Regulators can continue enforcing provisions that are not currently enjoined and can review complaints and investigate non-enjoined entities.

What's Next

- Three federal lawsuits are shaping what provisions are enforceable and for whom:
  - **ABI/Bankers/Employer Plans Case:** Iowa Association of Business and Industry et al. v. Iowa Insurance Commissioner (S.D. Iowa No. 4:25-cv-00211). A limited preliminary injunction is in place; both sides appealed (8th Cir. Nos. 25-2494 and 25-2591).
  - **Wellmark Case:** Wellmark, Inc. v. Iowa Insurance Commissioner (S.D. Iowa No. 4:25-cv-00377). Court issued an injunction protecting Wellmark (and its covered arrangements) from enforcement of certain provisions while the case proceeds.
  - **OptumRx/United Case:** OptumRx, Inc. and related United entities v. Iowa Insurance Commissioner (S.D. Iowa No. 4:25-cv-00452). Case challenges application of SF 383 to additional PBM and plan-adjacent entities; it remains pending in district court.
- **Why the Bill Is Held Up:** Federal courts have temporarily enjoined enforcement of specific provisions as applied to specific plaintiffs while they evaluate federal preemption (including ERISA), First Amendment, and related administrative-law questions.

Projected Timeline:

February 12, 2026
Final brief due in the ABI appeals (8th Cir. Nos. 25-2494 & 25-2591) under the current briefing schedule.

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Spring–Summer 2026*
Eighth Circuit may schedule oral argument after briefing closes.

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Late 2026*
Eighth Circuit decision (timing varies).

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2026–2027*
Potential next steps: petitions for further review, and/or remand for additional district court proceedings depending on the appellate ruling; related cases may track or be influenced by the injunction appeal.

**Projected based on typical appellate sequencing; exact dates depend on court calendars and case management.*

How You Can Help

- **Support Continued Oversight While Litigation Proceeds:** Encourage the Iowa Insurance Division to enforce non-enjoined provisions and respond promptly to complaints within current legal boundaries.
- **Ask for Transparent Implementation Updates:** Request periodic, plain language status updates on what is enforceable today and what is paused due to court orders.
- **Help Build the Record:** Direct stakeholders to document real-world impacts (patient access disruptions, pharmacy closures, network discrimination, unexpected cost-sharing, and administrative barriers) so policymakers have clear, Iowa-specific facts as courts and agencies act.
- **Stay Focused on Patients and Employers:** The goal is predictable, fair pharmacy access and pricing—especially for rural Iowans—while ensuring legal durability under federal standards.

IOWA PHARMACY ASSOCIATION