

## **Rule Impact Statement (2025)**

### **A. Purpose of the proposed rule and legal authority (75 OS 253(B)(2)(b)(1), 75 OS 303(D)(2)(a))**

The purpose of the proposed rule changes is to ensure continued access to pharmacists' services should there be future changes in pharmacists' scope of practice.

The legal authority for this proposed rule is 63 O.S. §5007(C)(2) and 56 O.S. §4002.12.

### **B. Brief description of the proposed rule (75 OS 253(B)(2)(b)(3))**

The proposed changes make minor administrative revisions to pharmacists' services policy. The proposed revisions remove citations of specific state law and Board of Pharmacy administrative rules. Future changes to pharmacists' scope of practice may not be reflected in the specific statute or administrative rules cited in current OHCA rules. The proposed changes will ensure that OHCA policy aligns with any statutory or regulatory changes to pharmacists' scope of practice in the future. There is no impact on current coverage of pharmacists' services.

### **C. Classification of proposed rule (75 OS 253(B)(2)(b)(2))**

**Classification:** Nonmajor

**Justification:** The proposed changes are expected to be budget neutral because they do not make any functional program changes. There is no impact on current coverage or reimbursement.

**Total annual implementation and compliance costs:** Budget neutral.

**Methodology used to calculate costs (75 OS 253(B)(2)(b)(7)):** There are no anticipated costs associated with the proposed changes; they do not make any changes to current coverage or reimbursement of pharmacists' services.

### **D. Description of affected classes of persons most likely to be impacted by the proposed rule (75 OS 253(B)(2)(b)(4), 75 OS 303(D)(2)(b))**

Pharmacists and SoonerCare members who choose to receive services from pharmacists will be positively affected by this rule.

### **E. Description of classes who will benefit from the proposed rule (75 OS 253(B)(2)(b)(5), 75 OS 303(D)(2)(c))**

The proposed policy ensures continued access to pharmacists' services for SoonerCare members, should their statutory or regulatory scope of practice change. Pharmacists and SoonerCare members who choose to receive services from pharmacists will benefit from the proposed rule.

### **F. Comprehensive economic impact analysis (75 OS 253(B)(2)(b)(6), 75 OS 303(D)(2)(d)):** The proposed changes are expected to be budget neutral because they do not make any functional program changes. There is no impact on current coverage or reimbursement.

**Methodology used to calculated costs (75 OS 253(B)(2)(b)(7)):** There are no anticipated costs associated with the proposed changes; they do not make any changes to current coverage or reimbursement of pharmacists' services.

**G. Probable costs and benefits to OHCA and other agencies (75 OS 253(B)(2)(b)(6), 75 OS 303(D)(2)(e))**

The are no anticipated costs to OHCA associated with this proposed rule. The proposed changes will eliminate the need for OHCA to promulgate a rule change if pharmacists' statutory or regulatory scope of practice changes in the future. If there is a change in pharmacists' scope of practice, OHCA will have regulatory authority to begin covering and reimbursing for those newly included services immediately. OHCA will benefit from increased regulatory efficiency and reduced administrative burden.

There are no anticipated impacts of the proposed rules on other agencies.

**H. Economic impact on political subdivisions and whether their cooperation is required (75 OS 253(B)(2)(b)(8), 75 OS 303(D)(2)(f))**

There is no anticipated economic impact on any political subdivisions, and their cooperation is not required.

**I. Economic impact on small businesses (75 OS 253(B)(2)(b)(9), 75 OS 303 (D)(2)(g))**

There is no anticipated economic impact on small businesses.

**J. Measures taken to minimize compliance costs and assessment of less costly, less intrusive, or nonregulatory alternatives (75 OS 253(B)(2)(b)(10), 75 OS 303(D)(2)(h))**

The proposed changes increase regulatory efficiency and minimize the administrative burden on OHCA. The purpose of these changes is to minimize future regulatory activity related to OHCA coverage of pharmacists' services. There are no compliance costs associated with the proposed changes. There are no less intrusive alternatives to the proposed changes.

**K. Effect of the rule on public health, safety, and the environment (75 OS 253(B)(2)(b)(11), 75 OS 303(D)(2)(i))**

The proposed rule changes are anticipated to have a positive effect on public health by ensuring continued access to pharmacists' services for SoonerCare members.

**L. Detrimental effects if the proposed rule is not implemented (75 OS 253(B)(2)(b)(12), 75 OS 303(D)(2)(j))**

If the proposed rules are not implemented, SoonerCare members may see a disruption in access to care if there are changes to pharmacists' statutory or regulatory scope of practice in the future.

OHCA may be out of compliance with statute requiring Medicaid coverage of pharmacists' services (56 O.S. §4002.12).

**M. Summary of and preliminary comparison to existing or proposed federal regulations (75 OS 303(D)(2)(n))**

The proposed changes are aligned with federal regulations on medical care provided by other licensed practitioners (42 CFR 440.60).

**N. Analysis of alternatives to adopting the proposed rule (75 OS 303(D)(2)(l))**

56 O.S. §4002.12 directs the OHCA to reimburse pharmacists for services within their scope of practice at the same rate as other qualified providers. If the proposed rules are not adopted and there are changes to pharmacists' scope of practice in the future that are not captured in existing statute or administrative rules, OHCA will not have regulatory authority to cover those new services to be covered and will be out of compliance with statute. Rule changes may be necessary in the future.

**O. Estimates of internal OHCA employee time and other resources used to develop the proposed rule (75 OS 303(D)(2)(m))**

Policy staff time: 10 hours

Pharmacy staff time: 5 hours

Medical staff time: 5 hours

**P. Date statement prepared or modified (75 OS 253(B)(2)(b)(13), 75 OS 303(D)(2)(k))**

Prepared: November 25, 2025