

**Pharmacy Choice Commission Fine / Penalty
Recommendations for Violations of Oklahoma
Statutes by PBMs**

| Violation Type | Minimum Fine / Penalty Reccomended |
|---|---|
| Transaction Fee charged | |
| MAC Pricing | |
| Network/GeoAccess | |
| Choice Restriction - Referred to PBM Owned | |
| Choice Restriction - Referred to PBM Owned Specialty Pharmacy | |
| Partial Referral List (Referred to Non-PBM owned) | |
| Network Enrollment / Participation / Credentialing Charge | |
| Consumer Share Differential Mail vs. Retail | |
| PBM denied contract to pharmacy | |
| Contract Restrictions Against Consumers | |
| PBM-Retro Claim Adjustment | |
| Retail Paid Less Than PBM Owned | |
| Late (untimely) response by a PBM to a Complaint | |
| Operating Without a License | |