

**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	