

2025 Executive Orders Impacting Pharmacy & Patient Care (Through October 1, 2025)

Executive Order (Date)	General Background	Impact on Pharmacy & Important Dates
<u>Executive Order 14346:</u> Modifying the Scope of Reciprocal Tariffs and Establishing Procedures for Implementing Trade and Security Agreements (September 5, 2025)	This executive order expands upon the trade actions outlined in Executive Order 14257, issued in April 2025.	Certain products, including pharmaceuticals under Section 232 investigation, were added to a list of products exempt from reciprocal tariffs. This action should help ensure that reciprocal tariffs do not hinder patient access to medications imported into the United States.
<u>Executive Order 14336:</u> Ensuring American Pharmaceutical Supply Chain Resilience by Filling the Strategic Active Pharmaceutical Ingredients Reserve (August 13, 2025)	This executive order seeks to strengthen the pharmaceutical supply chain in the United States by focusing on the stockpiling and domestic production of active pharmaceutical ingredients (APIs).	By stockpiling APIs domestically, this executive order has the potential to help prevent or mitigate the impact of future drug shortages. Important Dates September 12, 2025 (30 Days) – The Office of the Assistant Secretary for Preparedness and Response (ASPR) must develop a list of approximately 26 drugs critical to the country's health and security for use in creating a repository of APIs.¹ November 11, 2025 (90 Days) – ASPR must update ASPR's 2022 list of essential medicines and medical countermeasures.² December 11, 2025 (120 Days) – ASPR will prepare the Strategic Active Pharmaceutical Ingredients Reservice

¹ Ensuring American Pharmaceutical Supply Chain Resilience by Filling the Strategic Active Pharmaceutical Ingredients Reserve, Exec. Order No. 14336, 90 Fed. Reg. 40223 (August 13, 2025). Available at: <https://www.federalregister.gov/d/2025-15823/p-6>.

² *Id.* Available at: <https://www.federalregister.gov/d/2025-15823/p-9>.

		(SAPIR) repository to begin receiving and maintaining APIs. ³
<u>Executive Order 14332:</u> Improving Oversight of Federal Grantmaking (August 7, 2025)	The executive order seeks to ensure that the agency grantmaking process aligns with the administration’s policy priorities.	Funding for existing and future grants, particularly those related to DEI, LGBTQ+ rights, and immigrant services, may be subject to additional oversight and review, potentially making it more challenging to secure funding. Additionally, agencies should consider revising existing discretionary grants to permit immediate termination if the funding does not advance the agency’s policy priorities or the national interest. Important Dates September 6, 2025 (30 Days) – The agencies should review the terms and conditions used in their grants and report them, along with other relevant data, to the Director of the Office of Management and Budget (OMB).⁴
<u>Executive Order 14297:</u> Delivering Most-Favored-Nation Prescription Drug Pricing to American Patients (May 12, 2025)	The executive order aims to lower prescription drug prices, particularly for brand-name drugs without generic or biosimilar competition, by requiring manufacturers to offer their medications at prices equal to or lower than those paid by comparable developed nations.	Encourages HHS to assist pharmaceutical manufacturers in facilitating direct-to-consumer (DTC) purchasing programs for patients, provided they offer their medications at the most-favored-nation price. Within this framework, patients may be able to bypass pharmacies and purchase these medications directly from the manufacturer, outside of the patients’ relationship with their personal pharmacist. APhA has submitted principles for DTC programs to both HHS and drug manufacturers to protect the pharmacist-patient relationship. Important Dates

³ *Id.* Available at: <https://www.federalregister.gov/d/2025-15823/p-7>

⁴ Improving Oversight of Federal Grantmaking, Exec. Order No. 14332, 90 Fed. Reg. 38929 (August 7, 2025). Available at: <https://www.federalregister.gov/d/2025-15344/p-42>.

		June 11, 2025 (30 Days) – The Secretary of HHS should notify pharmaceutical manufacturers of the most-favored-nation price targets that aim to align prices in the United States with those of other developed nations. ⁵
<u>Executive Order 14295:</u> Increasing Efficiency at the Office of the Federal Register (May 9, 2025)	The Administration, through this executive order, aims to increase efficiency in the Federal Register to decrease publication delays and simplify the process of removing regulations from the Code of Federal Regulations.	This executive order has the potential to reduce delays in publishing regulatory actions, allowing agencies to take prompt action that impacts pharmacies and pharmacists, including the acceleration of deregulatory measures. Important Dates May 24, 2025 (15 Days) – The Office of the Federal Register (OFR) must outline the average publication times for different categories of documents and submit them to OMB.⁶ June 23, 2025 (45 Days) – OFR must review the fee schedule for publication within the Federal Register and ensure fees are reflective of the actual costs.⁷
<u>Executive Order 14292:</u> Improving the Safety and Security of Biological Research (May 5, 2025)	The executive order focuses on strengthening oversight and safety protocols regarding biological research, including gain-of-function studies involving pathogens with the potential to endanger Americans.	Placing these restrictions on this type of research may lead to future delays in the development of vaccines or therapeutics that depend on studying the virulence of such pathogens. Important Dates August 3, 2025 (90 Days) – The Office of Science and Technology (OSTP) should revise or replace the 2024 “Framework for Nucleic Acid Synthesis Screening” to ensure that relevant parties are utilizing appropriate methods to acquire

⁵ Delivering Most-Favored-Nation Prescription Drug Pricing to American Patients, Exec. Order No. 14297, 90 Fed. Reg. 20749 (May 12, 2025). Available at: <https://www.federalregister.gov/d/2025-08876/p-9>.

⁶ Increasing Efficiency at the Office of the Federal Register, Exec. Order No. 14295, 90 Fed. Reg. 20367 (May 9, 2025). Available at: <https://www.federalregister.gov/d/2025-08682/p-5>.

⁷ *Id.* Available at: <https://www.federalregister.gov/d/2025-08682/p-6>.

		synthetic nucleic acids and prevent misuse.⁸ September 2, 2025 (120 Days) – OSTP should revise or replace the 2024 “United States Government Policy for Oversight of Dual Use Research of Concern and Pathogens with Enhanced Pandemic Potential.”⁹ November 1, 2025 (180 Days) – OSTP should create and enforce a strategy to monitor, restrict, and document high-risk gain-of-function research that occurs without federal funding in the United States that poses a risk.¹⁰
<u>Executive Order 14291:</u> Establishment of the Religious Liberty Commission (May 1, 2025)	The executive order establishes the Religious Liberty Commission, which comprises 14 members appointed by the President and charged with producing a report on religious freedom and advising the White House Faith Office, the Domestic Policy Council, and other groups on religious liberty policies.	The newly created Religious Liberty Commission is tasked with studying conscience protections within the health care sector and vaccine mandates in relation to threats to religious freedom and liberty, as part of its comprehensive report.
<u>Executive Order 14279:</u> Reforming Accreditation To Strengthen Higher Education (April 23, 2025)	The executive order seeks to monitor higher education accreditors. It requires the Secretary of Education to hold them accountable for not meeting the criteria outlined by the administration and the Secretary.	Pharmacy schools and the accrediting bodies that oversee them may be impacted if they enforce DEI-related standards.
<u>Executive Order 14273:</u> Lowering Drug Prices by Once Again Putting Americans First (April 15, 2025)	The executive order aims to lower prescription drug prices for Americans by restoring initiatives from President Trump’s first term related to transparency, competition, and importation, and addressing deficiencies in the Inflation Reduction Act’s Medicare Drug Price Negotiation Program.	The executive order specifically seeks to restore prior initiatives that promote competition and transparency through the development of generic and biosimilar alternatives, the importation of lower-cost medications, the creation of reforms that mandate government-mandated drug discounts to be passed on to patients, the promulgation of new transparency rules, and the establishment of maximum insulin prices.

⁸ Improving the Safety and Security of Biological Research, Exec. Order No. 14292, 90 Fed. Reg. 19611 (May 5, 2025).

Available at: <https://www.federalregister.gov/d/2025-08266/p-14>.

⁹ *Id.* Available at: <https://www.federalregister.gov/d/2025-08266/p-10>.

¹⁰ *Id.* Available at: <https://www.federalregister.gov/d/2025-08266/p-15>.

		Important Dates June 14, 2025 (60 Days) – The Secretary of HHS must seek feedback on the Medicare Drug Price Negotiation Program for the initial price applicability year 2028 and manufacturer effectuation of maximum fair prices for 2026, 2027, and 2028.¹¹ July 14, 2025 (90 Days) – The Secretary of HHS should work to condition certain future grants to health centers requiring them to make insulin and injectable epinephrine available at or below the price the health center pays for the product under the 340B Prescription Drug Program to certain low-income individuals.¹² July 14, 2025 (90 Days) – The Assistant to the President for Domestic Policy must provide the President with recommendations on how to make the pharmaceutical market more competitive, efficient, and transparent, to lower drug costs.¹³ July 14, 2025 (90 Days) – The Secretary of HHS should work towards streamlining the Importation Program to allow states to obtain approval more easily.¹⁴ October 12, 2025 (180 Days) – The Assistant to the President for Domestic Policy should prepare recommendations for the President regarding ways to lower Medicare Part D premiums.¹⁵ October 12, 2025 (180 Days) – The Secretary of HHS should outline a plan, within the <i>Federal Register</i>, to conduct a survey to ascertain the
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¹¹ Lowering Drug Prices by Once Again Putting Americans First, Exec. Order No. 14273, 90 Fed. Reg. 16441 (April 15, 2025). Available at: <https://www.federalregister.gov/d/2025-06837/p-8>.

¹² *Id.* Available at: <https://www.federalregister.gov/d/2025-06837/p-14>.

¹³ *Id.* Available at: <https://www.federalregister.gov/d/2025-06837/p-18>.

¹⁴ *Id.* Available at: <https://www.federalregister.gov/d/2025-06837/p-22>.

¹⁵ *Id.* Available at: <https://www.federalregister.gov/d/2025-06837/p-9>.

		hospital acquisition cost for covered outpatient medications.¹⁶ October 12, 2025 (180 Days) – The OMB Director, the Assistant to the President for Domestic Policy, and the Assistant to the President for Economic Policy should provide the President with recommendations on how to ensure pharmaceutical manufacturers are appropriately paying Medicaid drug rebates and ways to innovate the Medicaid drug payment model to align payment with value.¹⁷ October 12, 2025 (180 Days) – The Secretary should issue a report outlining ways to speed up the approval of generics and biosimilars and to improve the process for prescription to over-the-counter switches.¹⁸ October 12, 2025 (180 Days) – The Secretary should review the volume of drugs being administered in physician office settings and hospital outpatient departments to assess whether any regulatory changes are needed to maximize Medicare’s financial resources.¹⁹ October 12, 2025 (180 Days) – The Secretary of Labor should review the Employee Retirement Income Security Act of 1974 and propose regulations that create greater transparency as to the direct and indirect compensation that PBMs are receiving.²⁰ October 12, 2025 (180 Days) – The Secretary of HHS should work with the Department of Justice, the Department of Commerce, and the Federal Trade Commission to issue a report on ways to decrease anti-
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¹⁶ *Id.* Available at: <https://www.federalregister.gov/d/2025-06837/p-12>.

¹⁷ *Id.* Available at: <https://www.federalregister.gov/d/2025-06837/p-13>.

¹⁸ *Id.* Available at: <https://www.federalregister.gov/d/2025-06837/p-19>.

¹⁹ *Id.* Available at: <https://www.federalregister.gov/d/2025-06837/p-23>.

²⁰ *Id.* Available at: <https://www.federalregister.gov/d/2025-06837/p-24>.

		competitive practices by pharmaceutical manufacturers. ²¹ April 15, 2026 (1 Year) – The Secretary should utilize the appropriate rulemaking process to test a payment model that evaluates ways for Medicare beneficiaries to access high-cost prescription drugs and biologics that are not included within the Medicare Drug Price Negotiation Program. ²²
<u>Executive Order 14257:</u> Regulating Imports With a Reciprocal Tariff To Rectify Trade Practices That Contribute to Large and Persistent Annual United States Goods Trade Deficits (April 2, 2025)	The executive order declares a national emergency with respect to the lack of reciprocal tariffs, disparate tariff rates, and non-tariff barriers that disadvantage the United States.	The implementation of reciprocal tariffs has the potential to increase the costs of generic drugs, APIs, and other medications coming from countries subject to them.
<u>Executive Order 14236:</u> Additional Rescissions of Harmful Executive Orders and Actions (March 14, 2025)	The executive order builds upon President Trump’s previous executive order to continue reversing executive actions taken by President Biden that do not align with the goals and policies of his administration.	One of President Biden’s executive orders that was revoked was <u>Executive Order 13994</u> , “Ensuring a Data-Driven Response to COVID-19 and Future High-Consequence Public Health Threats,” which tasked those involved with public health responses to coordinate for future threats and improve how public health data is gathered and used in this coordination.
<u>Executive Order 14222:</u> Implementing the President’s “Department of Government Efficiency” Cost Efficiency Initiative (February 26, 2025)	The executive order outlines the administration’s approach to accounting for government spending and promoting accountability and transparency in relation to government funds.	Pharmacists, pharmacies, pharmacy schools, and related organizations may face greater challenges in securing funding from governmental agencies and contracting with them in the future. Important Dates March 28, 2025 (30 Days) – The heads of agencies should review funding

²¹ *Id.* Available at: <https://www.federalregister.gov/d/2025-06837/p-25>.

²² *Id.* Available at: <https://www.federalregister.gov/d/2025-06837/p-11>.

		disbursed via contracts and grants to educational institutions.²³ March 28, 2025 (30 Days) – The heads of agencies should meet with the agency’s DOGE Team Lead to review the agency’s contracting policies, procedures, and personnel.²⁴
<u>Executive Order 14221:</u> Making America Healthy Again by Empowering Patients With Clear, Accurate, and Actionable Healthcare Pricing Information (February 25, 2025)	The executive order confronts opaque pricing arrangements by promoting transparent pricing and enforcing price transparency requirements.	The executive order instructs department secretaries to promulgate and initiate regulations that require the disclosure of actual health care prices and issue guidance, including enforcement policies, on the reporting of this data from hospitals and health plans. Important Dates May 26, 2025 (90 Days) – The Secretaries of the Departments of the Treasury, Labor, and HHS should take action to implement and enforce health care price transparency regulations.²⁵
<u>Executive Order 14219:</u> Ensuring Lawful Governance and Implementing the President's "Department of Government Efficiency" Deregulatory Initiative (February 19, 2025)	The executive order instructs the agencies to review existing regulations and utilize their limited enforcement resources on regulations that are legally sound.	Regulations that lack a clear legal basis may be repealed or rescinded as part of the administration’s deregulatory efforts outlined in this executive order. Important Dates April 20, 2025 (60 Days) – The heads of the agencies should review all regulations within their scope to ensure they are consistent with the administration’s policies and categorize them for further review.²⁶ April 20, 2025 (60 Days) – Regulations flagged for further (i.e., those that are within a category provided in

²³ Implementing the President’s “Department of Government Efficiency” Cost Efficiency Initiative, Exec. Order No. 14222, 90 Fed. Reg. 11095 (February 26, 2025). Available at: <https://www.federalregister.gov/d/2025-03527/p-12>.

²⁴ *Id.* Available at: <https://www.federalregister.gov/d/2025-03527/p-13>.

²⁵ Making America Healthy Again by Empowering Patients With Clear, Accurate, and Actionable Healthcare Pricing Information, Exec. Order No. 14221, 90 Fed. Reg. 11005 (February 25, 2025). Available at: <https://www.federalregister.gov/d/2025-03440/p-8>.

²⁶ Ensuring Lawful Governance and Implementing the President’s “Department of Government Efficiency” Deregulatory Initiative, Exec. Order No. 14219, 90 Fed. Reg. 10583 (February 19, 2025). Available at: <https://www.federalregister.gov/d/2025-03138/p-3>.

		subsection (a) of Section 2 of the EO) should be sent to the Administrator of the Office of Information and Regulatory Affairs. ²⁷
<u>Executive Order 14217:</u> Commencing the Reduction of the Federal Bureaucracy (February 19, 2025)	The executive order aims to reduce the size and scope of the federal government by eliminating government entities and advisory committees deemed unnecessary.	As part of these reductions, the Secretary of HHS was asked to terminate the Secretary's Advisory Committee on Long COVID, and the Administrator of CMS was asked to terminate the Health Equity Advisory Committee. Important Dates March 21, 2025 (30 Days) - The Assistant to the President for National Security Affairs, the Assistant to the President for Economic Policy, and the Assistant to the President for Domestic Policy must submit to the President a list of governmental entities and advisory committees that should be eliminated. ²⁸
<u>Executive Order 14212:</u> Establishing the President's Make America Healthy Again Commission (February 13, 2025)	The executive order establishes the President's Make America Healthy Again (MAHA) Commission, which is tasked with addressing the decline in health in the United States.	The executive order directs the MAHA Commission to place an emphasis on nutrition and chronic disease prevention, enabling pharmacists to take a more active role in providing clinical services and education related to these topics. The executive order also requests that the MAHA Commission review the threat of overutilization of prescription medications in children, making pharmacists' medication expertise in this area even more crucial. Important Dates May 24, 2025 (100 Days) – The MAHA Commission will submit the Make Our Children Healthy Again Assessment to the President. ²⁹

²⁷ *Id.* Available at: <https://www.federalregister.gov/d/2025-03138/p-12>.

²⁸ Commencing the Reduction of the Federal Bureaucracy, Exec. Order No. 14217, 90 Fed. Reg. 10577 (February 19, 2025). Available at: <https://www.federalregister.gov/d/2025-03133/p-23>.

²⁹ Establishing the President's Make America Healthy Again Commission, Exec. Order No. 14212, 90 Fed. Reg. 9833 (February 13, 2025). Available at: <https://www.federalregister.gov/d/2025-02871/p-33>.

		August 12, 2025 (180 Days) – The MAHA Commission will submit a Make Our Children Healthy Again Strategy to the President. ³⁰
Executive Order 14210: Implementing the President's "Department of Government Efficiency" Workforce Optimization Initiative (February 11, 2025)	The executive order outlines a hiring freeze and directs the Office of Management and Budget (OMB) to reduce the federal workforce by hiring no more than one employee for every four employees who leave, and to prepare for large-scale reductions in force. The executive order also provided for reorganization and restructuring to promote efficiency.	The federal workforce restructuring and reductions in force could lead to reduced support staff, program cuts, and delayed responses in agency initiatives and programs that pharmacies and pharmacists rely on.
Executive Order 14192: Unleashing Prosperity Through Deregulation (January 31, 2025)	The executive order outlines the administration's deregulatory initiatives through policies that require agencies to identify ten existing regulations to be repealed for each one they propose, and that the total incremental cost of new regulations should come at a net cost below zero.	The elimination of ten existing regulations for every new one introduced could impact how FDA, CMS, and HHS issue new rules and guidance affecting pharmacies and pharmacists. APhA has actively engaged with these agencies regarding their deregulatory efforts through the submission of comment letters . APhA provided deregulatory actions that promote the greater utilization of pharmacists while maximizing efficiency and reducing health care costs.
Executive Order 14187: Protecting Children From Chemical and Surgical Mutilation (January 28, 2025)	The executive order provides that government funds cannot be used to fund or support gender-affirming care for minors or research related to it.	The executive order defines "chemical and surgical mutilation" to include the use of puberty blockers to delay puberty, sex hormones in those of the opposite sex, and surgical procedures that alter appearance or sexual organs to align with one's opposite sex assigned at birth. Pharmacies, hospitals, and pharmacists providing gender-affirming care may face legal barriers, particularly regarding funding and reimbursement for these services and associated medications. Academic institutions conducting

³⁰ *Id.* Available at: <https://www.federalregister.gov/d/2025-02871/p-44>.

		adjacent research may also lose federal funding or future grants.
<u>Executive Order 14174:</u> Revocation of Certain Executive Orders (January 21, 2025)	The executive revoked two executive orders (Executive Orders 14042 and 14043) related to COVID-19 issued by President Biden.	Executive Orders 14042 and 14043 mandated COVID-19 vaccines for federal contractors and federal employees, respectively. Since these executive orders were revoked, pharmacies and pharmacists providing health care services to these groups of individuals may need to provide additional education to patients receiving the COVID-19 vaccine.
<u>Executive Order 14158:</u> Establishing and Implementing the President's "Department of Government Efficiency" (January 20, 2025)	The executive order reorganizes the United States Digital Service into the United States DOGE Service to implement the President's DOGE agenda, which seeks to modernize the technology and software used by the federal government to increase efficiency and productivity.	Pharmacies, pharmacists, and researchers should expect increased scrutiny regarding federal health care spending and research funding. Additionally, those with federal government grants and contracts may face additional reporting requirements to justify spending and revisions, as well as potential pauses in future funding or contracting.
<u>Executive Order 14155:</u> Withdrawing the United States From the World Health Organization (January 20, 2025)	The executive order outlines the United States's intention to withdraw from the World Health Organization (WHO). It revokes President Biden's Executive Order 13987 , which provided part of the United States's response to the COVID-19 pandemic.	Pharmacists and researchers who depend on WHO guidance and standards may see a delay in understanding emerging global health threats and outbreaks. Additionally, the revocation of Executive Order 13987 reduces the centralized, coordinated efforts of the federal government's COVID-19 response.
<u>Executive Order 14151:</u> Ending Radical and Wasteful Government DEI Programs and Preferencing (January 20, 2025)	The executive order asks OMB to oversee the termination of all diversity, equity, inclusion, and accessibility (DEIA) offices, positions, initiatives, programs, contracts, and grants.	Pharmacies and pharmacists that receive grants or contracts tied to equity initiatives risk losing future funding. Pharmacy schools affiliated with public universities may see the elimination of DEIA positions, offices, or programs due to funding cuts or the university's fear of losing federal funding. Important Dates March 21, 2025 (60 Days) – Governmental agencies, departments, and commissions must terminate all DEIA and environmental justice

		offices, positions, initiatives, programs, contracts, and grants. ³¹
<u>Executive Order 14148:</u> Initial Rescissions of Harmful Executive Orders and Actions (January 20, 2025)	The executive order revokes dozens of executive orders issued by President Biden, as part of President Trump’s efforts to restore common sense to the government.	Some of the executive orders revoked include: • <u>Executive Order 13897</u> required the federal government to establish a coordinated response to COVID-19. • <u>Executive Order 13995</u> addressed disparities in health outcomes related to COVID-19 and established the COVID-19 Health Equity Task Force. • <u>Executive Order 14009</u> directed the federal agencies to remove barriers to accessing Medicaid or Affordable Care Act health care coverage. • <u>Executive Order 14070</u> expanded coverage provided through Medicaid and the Affordable Care Act via efforts to increase enrollment and lower prices. • <u>Executive Order 14087</u> outlined actions to lower prescription drug costs through the use of the Center for Medicare and Medicaid Innovation. Important Dates March 6, 2025 (45 Days) – The Director of the Domestic Policy Council, the Director of the National Economic Council, and the National Security Advisor should recommend additional orders, memoranda, and proclamations issued by the Biden administration to be considered for repeal.³²

³¹ Ending Radical and Wasteful Government DEI Programs and Preferencing, Exec. Order No. 14151, 90 Fed. Reg. 8339 (January 20, 2025). Available at: <https://www.federalregister.gov/d/2025-01953/p-5>.

³² Initial Rescissions of Harmful Executive Orders and Actions, Exec. Order No. 14148, 90 Fed. Reg. 8237 (January 20, 2025). Available at: <https://www.federalregister.gov/d/2025-01901/p-83>.