

OREGON HEALTH AUTHORITY
DRUG USE REVIEW/PHARMACY AND THERAPEUTICS COMMITTEE

OPERATING PROCEDURES

Updated: December 2023

MISSION:

To encourage safe, effective, and innovative drug policies that promote high value medications for patients served by the Oregon Health Plan (OHP) and other health care programs under the Oregon Health Authority (OHA) by evidence-based committee review of drug use research, clinical guidance and education.

DUTIES:

As defined by Oregon Revised Statutes (Chapter 414) the Pharmacy and Therapeutics (P&T) Committee was established to perform functions previously fulfilled by the Drug Use Review Board and Health Resources Commission. Responsibilities of the P&T committee include:

1. Evaluate evidence-based reviews of prescription drug classes or individual drugs to assist in making recommendations to the OHA for drugs to be included on the preferred drug list (PDL).
 - a. The P&T Committee may direct a Subcommittee to prepare these reviews.
2. Advise the OHA on administration of Federally mandated Medicaid retrospective and prospective drug use review (DUR) programs which includes recommending utilization controls, prior authorization requirements, quantity limits and other conditions for coverage.
3. Recommendations will be based on evaluation of the available evidence regarding safety, efficacy and value of prescription drugs, as well as the ability of Oregonians to access prescriptions that are appropriate for their clinical conditions.
4. Publish and distribute educational information to prescribers and pharmacists regarding the committee activities and the drug use review programs. Meeting materials including written public comments, recordings, documents, and minutes remain publicly available online after the meeting. Comments are subject to Oregon public records law and should not disclose identifiable, personal health information.
5. Collaborate with the Health Evidence Review Commission (HERC) on topics involving prescription drugs that require further considerations under the purview of the HERC.
6. Consider input from Mental Health Clinical Advisory Group (MHCAG) on topics involving mental health. The Mental Health Clinical Advisory Group can make recommendations to both the Oregon Health Authority and the Pharmacy and Therapeutics Committee for:
 - a. Implementation of evidence-based algorithms.
 - b. Any changes needed to any preferred drug list used by the authority.
 - c. Practice guidelines for the treatment of mental health disorders with mental health drugs.
 - d. Coordinating the work of the group with an entity that offers a psychiatric advice hotline.
7. Guide and approve meeting agendas.

8. Periodically review and update operating procedures and evidence grading methods as needed.

AD HOC SUBJECT MATTER EXPERT INVOLVEMENT:

1. The Director shall appoint an ad hoc expert to the P&T Committee when:
 - a. The P&T Committee determines it lacks current clinical or treatment expertise with respect to a particular therapeutic class; or
 - b. An interested outside party requests appointment and demonstrates to the satisfaction of Oregon Health Authority that the P&T Committee lacks necessary clinical knowledge or subject matter expertise with respect to a particular therapeutic class. All such requests must be made at least 21 calendar days before the P&T Committee meeting at which the class will be discussed.
 - c. Requests for consideration of subject matter expert appointment may be sent by email to OHA.pharmacy@odhsoha.oregon.gov. Requests must identify the clinical topic under review and rationale for why an ad hoc subject matter expert would be necessary to add to the P&T Committee.
 - d. Ad hoc subject matter experts will have the same requirements, duties, and responsibilities as current P&T Committee members.
 - e. Subject matter experts must be licensed and actively practicing in Oregon.
2. The subject matter experts shall have full voting rights with respect to the PDL drugs for which they have been selected and appointed including all utilization controls, prior authorization requirements, review of confidential pricing information or other conditions for the inclusion of a drug on the PDL. The subject matter experts may participate but may not vote in any other activities of the committee during the meeting.
3. P&T Committee staff also may engage relevant health care professionals with clinical specialty to review evidence summary documents prepared for the P&T Committee, in addition to the ad hoc subject matter experts, if needed.

CONDUCT OF MEETINGS:

1. All meetings and notice of meetings will be held in compliance with the Oregon Public Meetings Law.
2. The P&T Committee will elect a Chairperson and Vice Chairperson to conduct the meetings. Elections shall be held the first meeting of the calendar year.
3. Quorum consists of 6 permanent members of the P&T Committee. Quorum is required for any official vote or action to take place throughout a meeting.
4. All official actions must be taken by a public vote. Any recommendation from the Committee requires an affirmative vote of a majority of the Committee members.
5. The committee shall meet in executive session for purposes of reviewing the prescribing or dispensing practices of individual prescribers or pharmacists; reviewing profiles of individual patients; and reviewing confidential drug pricing information to inform the recommendations regarding inclusion of drugs on the Practitioner-Managed Prescription Drug Plan (PMPDP) or any preferred drug lists adopted by the OHA.
6. Meetings will be held at least quarterly but the Committee may be asked to convene up to monthly by the call of the OHA Director or a majority of the members of the Committee. DUR programs will be the focus of the meeting quarterly.
7. Agenda items for which there are no recommended changes based on the clinical evidence may be included in a consent agenda.

- a. Items listed under the consent agenda will be approved by a single motion without separate discussion. If separate discussion is desired, that item will be removed from the consent agenda and placed on the regular business agenda.
 - b. Consent agenda items may include (but are not limited to) meeting minutes, drug class literature scans, and abbreviated drug reviews for unfunded conditions.
8. The Oregon Health Authority and P&T Committee are committed to creating a public meeting environment that is inclusive, welcoming, and respectful for all P&T Committee members, staff, and public attendees. Some general guidance and expectations for respectful meeting conduct include:
 - a. Attendees of any P&T Committee meeting are expected to behave in a professional, honest, and ethical manner.
 - b. Abusive, aggressive, and disrespectful language or behavior is not welcome at meetings. Staff have the authority to mute meeting participants or remove them from the meeting if they engage in this behavior.
 - c. If you have a concern regarding your experience during a meeting, please help staff create an inclusive environment by sharing your experience, concerns, and feedback. Feedback can be submitted to osupharm.di@oregonstate.edu.

CONFLICT OF INTEREST POLICY:

The P&T Committee will function in a way that ensures the objectivity and credibility of its recommendations.

1. All potential initial committee members, staff members and consultants, future applicants, expert or peer reviewers, and ad-hoc subject matter experts selected for individual P&T Committee meetings are subject to the Conflict of Interest disclosure requirements in ORS Chapter 244 and are required to submit a completed disclosure form as part of the appointment process and annually during their appointment. Any changes in status must be updated promptly.
2. Staff members are required to have no financial conflicts related to any pharmaceutical industry business for duration of work on P&T projects.
3. All disclosed conflicts will be considered before an offer of appointment is made.
4. If any material conflict of interest is not disclosed by a member of the P&T Committee on his or her application or prior to participation in consideration of an affected drug or drug class or other action of the Committee, that person will not be able to participate in voting decisions of the affected drug or drug class and may be subject to dismissal. Circumstances in which conflicts of interest not fully disclosed for peer reviewers, ad-hoc experts, or persons providing public comment will be addressed on a case by case basis.
5. Any person providing public testimony are also requested to disclose all conflicts of interest including, but not limited to, industry funded research prior to any testimony pertaining to issues before the P&T Committee. This includes any relationships or activities which could be perceived to have influenced, or that would give the appearance of potentially influencing testimony.

PUBLIC COMMENT:

1. The P&T Committee meetings will be open to the public.
2. The P&T Committee shall provide appropriate opportunity for public testimony at each meeting.

- a. Testimony can be submitted in writing or provided in-person. Persons planning to provide oral testimony during the meeting are requested to sign up and submit a conflict of interest form no later than 24 hours prior to the start of the meeting.
 - b. Maximum of 3 minutes per speaker/institution per agenda item
 - i. Information that is most helpful to the Committee is evidence-based and comparative research, limited to new information not already being reviewed by the Committee.
 - ii. Oral presentation of information from FDA-approved labeling (i.e., Prescribing Information or “package insert”) is not helpful to the Committee.
 - c. Please address written testimony related to final posted documents to the P&T Committee. Interested parties may submit written testimony on agenda items being considered by the P&T committee through the public comment link found on the P&T Committee website: (<http://oregonstate.edu/tools/mailform?to=osupharm.di@oregonstate.edu&recipient=Drug+Use+Research+and+Management>). Written testimony that includes clinical information should be submitted at least 2 weeks prior to the scheduled meeting to allow staff and Committee members time to review the information.
 - d. Written documents provided during scheduled public testimony time of P&T Committee meetings will be limited to 2 pages of new information that was not included in previous reviews. Prescribing Information is not considered new information; only clinically relevant changes made to Prescribing Information should be submitted.
 - e. If committee members have additional questions or request input from public members during deliberations after the public comment period, members of the public may be recognized at the discretion of the committee chair to answer questions of the committee or provide additional commentary.
3. Written public comment is welcome from all interested parties on draft documents posted prior to the meeting.
- a. Written public comments submitted during the draft comment period are only considered by staff in order to prepare final documents. Only written public comment submitted based on final documents will be submitted to the P&T Committee for consideration.
 - b. Interested parties may submit written testimony on posted draft documents through the public comment link found on the P&T Committee website: (<http://oregonstate.edu/tools/mailform?to=osupharm.di@oregonstate.edu&recipient=Drug+Use+Research+and+Management>).

REVIEW STANDARDS AND PREFERRED SOURCES OF EVIDENCE

1. The P&T Committee and department staff will evaluate drug and drug class reviews based on sound evidence-based research and processes widely accepted by the medical profession. These evidence summaries inform the recommendations for management of the PDL and clinical prior authorization criteria. These methods support the principles of evidence-based medicine and will continue to evolve to best fit the needs of the Committee and stay current with best practices. For detailed description of review standards, preferred sources of evidence, and evidence grading methods, see Quality Assessment Tool and Evidence Grading Methods.
2. Final documents as outlined in Chapter 414 of the Oregon Revised Statutes shall be made publicly available at least 30 days prior to review by the P&T Committee. Posted documents will include the agenda for the meeting, a list of drug classes to be considered, and background materials and supporting documentation

which have been provided to committee members with respect to drugs and drug classes that are before the committee for review.

DRUG AND DRUG CLASS REVIEWS:

1. Drug Class Reviews and New Drug Evaluations:

- a. The P&T Committee will review drugs and drug classes that have not been previously reviewed for PDL inclusion or for clinical PA criteria and will be prioritized based on:
 - i. Potential benefit or risk
 - ii. Use or potential use in covered population
 - iii. Potential for inappropriate use
 - iv. Alternatives available
 - v. OHP coverage based on opportunities for cost savings, to ensure medically appropriate drug use, or address potential safety risks.
- b. The P&T Committee will make a reasonable effort to perform a timely review of new FDA-approved drug products following their market release, when they are a new molecular entity and are candidates for coverage under the pharmacy benefit.
 - i. Until new drugs are reviewed by the P&T Committee, drugs meeting the following criteria will be reviewed to ensure they are used appropriately for an FDA-approved or compendia-supported indication, with FDA-approved dosing, and that the indication is funded by the OHP:
 - a. A new drug in a drug class with clinical prior authorization criteria.
 - b. A new drug used for a non-funded condition on the HERC Prioritized List of Health Services.
 - c. A new drug not in a PDL class with existing PA criteria identified by the reviewing pharmacist during the weekly claim processing drug file load costing more than \$5,000 per claim or \$5,000 per month.
- c. Line Extension and Combination Product Policy for existing drugs or active ingredients
 - i. Line extensions include new strengths or new formulations of an existing drug.
 1. When a new strength or formulation becomes available for a drug previously reviewed for the PDL and has PA criteria and the new product does not significantly differ from the existing drug based on clinical evaluation, the same utilization restrictions as the existing drug will apply until the new strength or formulation is presented to the P&T Committee for review.
 2. If a new strength or formulation becomes available for an existing preferred drug and the new product significantly differs from the existing medication in clinical uses or cost, the drug will not be preferred until the drug is reviewed by the P&T Committee.
 - ii. When a new combination product becomes available that is a formulation of one or more drugs that have been reviewed for the PDL, the product will be designated a non-preferred drug until the P&T Committee reviews the combination product.
 - iii. When a product becomes available that is a biosimilar for one or more drugs that have been reviewed for the PDL, where applicable, the product will be designated a non-preferred drug until the P&T Committee reviews the product. A complete list of biological products and biosimilar products can be accessed at the FDA's Purple Book website.
 - iv. Over-the-counter (OTC) formulations:
 1. When a product becomes available that is an over-the-counter formulation, the product will be added to the fee-for-service (FFS) benefit if it falls within an

existing PDL class previously reviewed by P&T. The policy outlined above for line extensions will apply. Exceptions to the standard rebate process will be determined by the Oregon Health Authority on a case-by-case basis based on access, availability, and affordability.

2. If OTC formulations that are not in an existing PDL class or are not in a drug category currently on the OTC list, then the product will be designated as not covered until the P&T Committee reviews the product.

2. Drug Class Literature Scans and Abbreviated Drug Reviews:

- a. Literature of drug classes that have previously been reviewed for the PDL will be scanned and evaluated as needed to assess the need to update drug policies based on clinically relevant information and significant changes in costs published since the last review.
- b. Abbreviated drug reviews will evaluate drugs for unfunded conditions. Evidence supporting these reports is derived primarily from information in the product labeling.