

**OREGON HEALTH AUTHORITY
PHARMACY AND THERAPEUTICS COMMITTEE**

POLICY & PROCEDURES

Updated: September 2019

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. OHA contracts with Drug Use Research and Management (DURM) to administer and lead P&T meetings. DURM is a project of Oregon State University's College of Pharmacy.

P&T COMMITTEE 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). 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, including recommending utilization controls, prior authorization (PA) 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.
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. Guide and approve meeting agendas.
7. Periodically review and update operating procedures and evidence grading methods as needed.

AD-HOC EXPERT INVOLVEMENT:

1. A medical expert may be chosen and appointed by the Director of the OHA to provide clinical or treatment expertise in response to a request by the P&T Committee or an interested outside party. The ad-hoc expert must be a licensed physician in Oregon who manages patients who would potentially receive a particular drug.
2. If an interested outside party requests that an ad-hoc expert be appointed for a particular drug this request must be made 45 days before the scheduled Committee meeting to ensure adequate time for the appointment process.

3. The medical 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 medical experts may participate but may not vote in any other activities of the committee.
4. P&T staff also may engage relevant health care professionals with clinical specialty to serve as expert reviewers, in addition to the ad-hoc 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.

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 medical 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 which must be updated promptly with any changes in status.

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 will also be required 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
 - 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. Written testimony can be submitted by interested parties for the P&T Committee to consider on agenda items. Written testimony that includes clinical information should be submitted for evaluation by staff at least 2 weeks prior to the scheduled meeting through the [P&T Committee public comment link](#) found on DURM website.
 - 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. Anyone providing public testimony (either in-person or in writing) will be required to disclose all conflicts of interest. The [Public Comment/Testimony Declaration form](#) may be submitted with written testimony before the meeting and should be submitted at the meeting for in-person testimony.

REVIEW STANDARDS AND PREFERRED SOURCES OF EVIDENCE

1. The P&T Committee and OHA 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. Written public comments submitted during the draft comment period prior to posting of final documents are only considered by staff. Written public comment submitted based on final documents will be submitted to the P&T Committee for consideration. 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.
3. For additional information on how DURM assesses quality and grades evidence, visit the [DURM website](#).

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.

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:

 - i. A new drug in a drug class with clinical prior authorization criteria.
 - ii. A new drug used for a non-funded condition on the HERC Prioritized List of Health Services.
 - iii. 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

- 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.

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.