

POLICY AND PROCEDURE

POLICY NAME: Pharmacy and Therapeutics Committee Member Documentation and Tracking	POLICY ID: CC.PHAR.16
BUSINESS UNIT: Corporate	FUNCTIONAL AREA: Quality Improvement
EFFECTIVE DATE: 05/15	PRODUCT(S): Commercial, Medicaid, Marketplace (On Exchange and Off Exchange)
REVIEWED/REVISED DATE: 05/16, 11/16, 11/17, 05/18, 05/19, 12/20, 05/21, 11/21, 05/22, 05/23, 05/24, 6/24, 5/25	
REGULATOR MOST RECENT APPROVAL DATE(S):	

PURPOSE:

The purpose of this policy is to provide evidence that membership standards are met for the P&T by following Centers for Medicare and Medicaid Services (CMS), Health and Human Services Department (HHS), Utilization Review Accreditation Commission (URAC), and National Committee for Quality Assurance (NCQA) established guidelines and assure members are free of conflict of interest.

SCOPE:

The Centene Pharmacy and Therapeutics (P&T) Committee servicing Commercial, Marketplace, Medicaid and Medicare lines of business. Where Marketplace is indicated as Product applicable to this policy, this includes both On Exchange and Off Exchange plans.

DEFINITIONS:

P&T – Pharmacy and Therapeutics
CMS - Centers for Medicare and Medicaid Services
HHS - Health and Human Services Department
URAC - Utilization Review Accreditation Commission
NCQA - National Committee for Quality Assurance

POLICY:

It is the policy of Centene to maintain documentation on all Pharmacy and Therapeutics (P&T) Committee membership.

PROCEDURE:

Centene Corporation ensures membership standards are met. The P&T committee must:

1. Have members that represent enough clinical specialties that adequately meet the needs of enrollees.
2. Consist of a majority of individuals who are practicing physicians, practicing pharmacists, and other practicing health care professionals licensed to prescribe drugs.
3. Prohibit any member with a conflict of interest with respect to the issuer or a pharmaceutical manufacturer from voting on any matters for which the conflict exists.
4. Require that at least 51% of the practicing pharmacists and practicing physicians are independent and free of conflict (health plan and pharmaceutical manufacturers) and are not employed with the organization.
5. Collect on an annual basis, between October 1 and the second business day of January, conflicts of interest and confidentiality statements revealing economic interests or relationships that could influence committee decisions. Forms collected are retained no longer than the period sufficient to meet legal and regulatory retention requirements and business needs as outlined in the Records Management policy and Records Retention Schedule (CC.COMP.09 in Archer).
6. Document evidence of receipt and retention of external members' invitations to join, participant credentials, and all P&T members' conflict of interest statements and confidentiality statements.
7. Perform monthly reviews of the exclusion list compiled by the Office of the Inspector General that would preclude them from being members of the committee.

REFERENCES:

1. CMS Chapter 6, Patient Protection and Affordable Care Act; HHS Notice of Benefit and Payment Parameters 45 CFR 156.122(a)(3), and Current NCQA Health Plan Standards and Guidelines
2. CC.COMP.09 Records Management and Records Retention Schedule
3. CC.PHAR.13 Pharmacy and Therapeutics Committee
4. CC.PHAR.17 Conflict of Interest and Confidentiality Agreement for P&T Committee membership

ATTACHMENTS:

- A. Checklist for Securing P&T Membership
- B. Invite Letter
- C. Acceptance Letter
- D. Annual Request for Information Letter
- E. Termination Letter
- F. Tracking Log

ROLES & RESPONSIBILITIES: N/A**REGULATORY REPORTING REQUIREMENTS:** N/A**REVISION LOG**

REVISION TYPE	REVISION SUMMARY	DATE APPROVED & PUBLISHED
Ad hoc	Updated Pharmacy Department to read Pharmacy Solutions	5/16
Ad hoc	Updated member standards, references, monthly audit of members against the Office of the Inspector General Exclusion list and notification of CMS within 30 days of committee membership changes.	11/16
Annual Review	Annual Review	11/17
Ad hoc	Added under 5, "Forms collected will be retained no longer than the period of time sufficient to meet all legal and regulatory retention requirements and business needs as outlined in the Records Management and Records Retention Schedule policies."; Updated references.	05/18
Ad hoc	Changed Product Type from ALL to Commercial, Health Insurance Marketplace, Medicaid and Medicare. From #6 in procedure removed business associate agreement as no member specific information is shared. Updated #7 in procedure to clarify that this applies to both corporate and health plan committees. Updated references to include CC.PHAR.17 Conflict of Interest and Confidentiality Forms. Updated the attachments and replaced with versions that had minor grammar and formatting changes. In definitions, removed CPCT, CMS, HHS and NCQA because they are defined in the policy. Minor grammatical and formatting changes.	05/19
Ad hoc	Minor grammatical edits to Attachments A, B, and C. No changes to Attachments D, E, F, but reattached them to this policy.	12/20
Annual Review	Annual Review. Added URAC to the Purpose section. Added URAC requirement that 50% of practicing pharmacists and physicians are free of conflict. Added additional clarification for the COI and confidentiality statements that they could reveal economic interests or relationships that could influence committee decisions.	05/21
Ad hoc	Added CC.PHAR.13 Pharmacy and Therapeutics Committee policy to the References section.	11/21
Annual Review	Annual Review- Attachments (Invite Letter, Acceptance Letter, and Annual Request for Information Letter) were updated.	05/22
Annual Review	Annual Review- Updated procedure to reflect the correct dates for collection of annual forms. Clarified documentation required for external members. Removed 30-day notification to CMS of change in membership as that only applies to Medicare which is delegated. Completed the annual review of attachments. Removed references to Health Plan P&T Committees.	5/23
Annual Review	Annual Review - No changes deemed necessary.	05/24
Ad hoc	Updated to reflect at least 51% of membership must be free of conflict.	06/24
Annual Review	Annual Review – Updated wording in membership letters. Changed usage of CPTC to P&T. Updated policy reference from CC.LEGL.01 to CC.COMP.09. Added definitions. Functional Area changed from Business Operations to Utilization Management. Updated Individual Family Plans to Marketplace (On Exchange and Off Exchange) for PRODUCT(S). Added Where Marketplace is indicated as	05/25

REVISION TYPE	REVISION SUMMARY	DATE APPROVED & PUBLISHED
	Product applicable to this policy, this includes both On Exchange and Off Exchange plans to SCOPE.	

POLICY AND PROCEDURE APPROVAL

The electronic approval retained in RSA Archer, the Company's P&P management software, is considered equivalent to a signature.