



June 6, 2019

The Honorable Kathy L Rapp
Chair, Pennsylvania House Health Committee
Room 213, Ryan Office Building
Harrisburg PA 17120

The Honorable Dan Frankel
Democratic Chair, Pennsylvania House Health Committee
322 Main Capitol Building
Harrisburg PA 17120

RE: HB 942 - Medicaid Pharmaceutical and Therapeutics Committee

Dear Chairwoman Rapp:

On behalf of the Pharmaceutical Care Management Association (PCMA), I am writing to express our comments on HB 942, which would establish a new membership structure for the Pharmaceutical & Therapeutics (P&T) Committee for the development of the Medicaid Preferred Drug List (PDL). PCMA is the national trade association representing America's pharmacy benefit managers (PBM), which administer prescription drug plans for more than 266 million Americans with health coverage provided through large and small employers, health insurance plans, labor unions, and federal and state-sponsored health care programs.

P&T committees are tasked with developing prescription drug formularies. These formularies are continually updated lists of drugs that a health plan or PBM will cover under a plan pharmacy benefit, or in this case, the list of drugs covered under the Department of Human Service's PDL. P&T committees are made up of physicians, pharmacists, and other clinical experts involved in the diagnosis and treatment of a wide range of conditions. Per the Department's Pharmacy & Therapeutics Committee By-Laws, the current committee is composed of the following external members¹:

- One Family Physician.
- One Certified Registered Nurse Practitioner.
- One Internist.
- One Pediatrician.
- One Psychiatrist.
- One Retail Pharmacist.
- One Hospital or Academic Pharmacist.
- One Physician or Pharmacist from each managed care zone.
- One Physician or Pharmacist, and/or one Consumer nominated by and representing the Office of Medical Assistance Programs Consumers.
- One Physician or Pharmacist, and/or one Consumer or Family Member representing the Office of Mental Health and Substance Abuse Services Consumers.

¹ http://www.dhs.pa.gov/cs/groups/webcontent/documents/document/c_209870.pdf



This committee's responsibilities include recommending a clinically-based PDL with an emphasis on effectiveness, safety and outcomes, recommending prior authorization guidelines for non-preferred drugs as well as certain preferred drugs using current community standards for prescribing and recommending drug utilization review program developments.² In short, these reviews focus only on clinical criteria, not economic or cost considerations.

As drafted, HB 942 changes the current structure by adding legislators and additional community pharmacist members. However, the current P&T Committee composition is sufficient, because it includes the clinical and medical experts from a wide range of practices that are necessary to develop the state's PDL. If any statutory changes to the P&T Committee structure are considered, we believe that DHS's input should be sought before adoption.

We appreciate your consideration of our comments. Please contact me at 202-756-5743 if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "April C. Alexander".

April C. Alexander
Assistant Vice President, State Affairs

cc: House Health Committee Members

²<http://www.dhs.pa.gov/communitypartners/informationforadvocatesandstakeholders/pharmacyandtherapeuticscommittee/>