

Ohio Department of Medicaid
PHARMACY AND THERAPEUTICS COMMITTEE
CONFLICT OF INTEREST POLICY

All members of the Pharmacy and Therapeutics (P&T) Committee are expected to conduct themselves in accordance with the highest professional ethical standards. Therefore, each member, as a condition of appointment, is required to abide by this policy.

- I. Conflict of Interest.** A conflict of interest means any substantial financial interest in the outcome of a review of a drug class or in the outcome of any other decision of the Committee, which may result in preferable treatment being granted to one drug over another. A conflict of interest may exist when a Committee member, or their immediate family member, has a relationship with organizations that may have a direct or indirect interest in the business in front of the Committee and such relationship could inappropriately influence the member's or another Committee member's judgment. This may also include a relationship with an organization, such as a manufacturer or pharmaceutical company, that competes with the drug under consideration. A relationship with an organization may include, but is not limited to, any of the following:
1. Employment by or appointment to or a position on a Board of Directors or corporate committee or panel.
 2. Holding a financial or shareholder interest (*including stocks, bond or other securities*) other than interests held in investment vehicles, like mutual funds, exchange traded funds, or blind investment trusts, where the member does not have an active management role.
 3. Having a consultant arrangement with and/or appointment to advisory panels.
 4. Acceptance of Honoraria.
 5. Participation in a Speaker's Bureau or appointment to company-sponsored Editorial Board.
 6. Acceptance of research support, including, but not limited to, research grants, educational grants or contracts.
 7. Acceptance of gifts, compensation, royalties, or rewards.
 8. Acceptance of support for travel for professional or educational activities or direct payment for presenting at continuing education or professional education programs.

Immediate family members include the member's spouse or partner, children, parents, and siblings.

- II. Disclosure.** All P&T Committee members must disclose, at least annually, any professional or financial affiliations held by themselves or held by their immediate family members with organizations that may have a direct or indirect interest in the business in front of the committee. Committee members have an ongoing duty to disclose to the Committee any conflicts or potential conflicts of interests as they arise. Please check the box of the statement that best applies:

No Conflicts. Neither I nor my immediate family have a current or recent (*within the last 24 months*) professional or financial affiliation with any organization that may have a direct or indirect interest in the business before the P&T Committee.

Disclosures. I or an immediate family member have/had a professional or financial affiliation with an organization that has or may have a direct or indirect interest in the business before the P&T Committee, as described below.

Organization	Role/Relationship

- III. Recusal.** All conflicts of interest will result in a recusal. If a member is recused, he/she shall not deliberate, debate, recommend, advise, vote or participate in any way in the decision making process for the class of drug(s) or drug(s) to which the recusal extends. This prohibition includes all communications with other members of the P&T Committee, whether inside or outside of formal meetings.
- IV. Conduct.** Each Committee member shall avoid any action that might give rise to the appearance of impropriety, such as engaging in any act that could create a conflict of interest (*see section I. Conflict of Interest*). Committee members shall abide by all Ohio laws and regulations governing appropriate ethical conduct of members of committees, boards or commissions. Committee members are encouraged to seek advice and assistance from the Ohio Ethics Commission, if necessary, to determine whether a potential conflict of interest exists.
- V. Violations.** Violations of this policy may result in dismissal from the Committee, in the discretion of the Director of the Ohio Department of Medicaid.
- VI. Agreement.** Each Committee member shall sign this policy upon appointment, annually, and when amendments are made to this policy from time to time.

I have received, read, and agree to abide by the Pharmacy and Therapeutics Committee Conflict of Interest Policy as a condition of my appointment.

Signature: _____ Date: _____

Printed name: _____