



To: Network Pharmacy
From: Elixir Pharmacy Audit and FWA Team
Date: Thursday, April 20, 2023
RE: The Pharmacy Audit Whisperer

This communication is being shared as a reminder of Elixir's contractual requirements, providing guidance for pharmacies on necessary practices to avoid audit chargebacks and ensure network compliance.

Maintaining Rx Compliance – Medicare Part D Focus

Following proper dispensing practices and Medicare Part D requirements for claim submissions is essential for success in the Elixir pharmacy network. The purpose of this communication is to share examples of drugs found during audits to be associated with questionable treatments, lack of supported medical use, billed to but not covered as a Medicare Part D benefit, and other dispensing errors with potential clinical impact. Such findings may result in audit chargeback, particularly if associated with patterns of fraud, waste or abuse.

Drug	Diagnoses not covered by Medicare Part D	Audit chargeback reason
Ozempic® (semaglutide) injection 0.5 mg, 1 mg, or 2 mg	Obesity, weight loss	Medicare Part D-approved coverage is for the drug's FDA label use, i.e., the adjunct treatment of type 2 diabetes mellitus. Medicare Part D does not cover weight loss drugs per legislation.
Mounjaro® (tirzepatide) injection 0.5 mL 2.5 mg, 5 mg, 7.5 mg, 10 mg, 12.5 mg, 15 mg	Obesity, weight loss	Medicare Part D-approved coverage is for the drug's FDA label use, i.e., the adjunct treatment of type 2 diabetes mellitus. Medicare Part D does not cover weight loss drugs per legislation.
Paxlovid™ (nirmatrelvir tablets; ritonavir tablets)	Prophylaxis, prevention of COVID-19, or use for longer than five consecutive days	Paxlovid is an investigational drug with limited information about safety and effectiveness. It is not approved or authorized by the FDA for prophylaxis for prevention of COVID-19, and not authorized for use for longer than five (5) consecutive days.
Pennsaid® solution 2%	Treatment of osteoarthritis/pain in parts of the body that are not the knee	Not a covered Medicare Part D indication, medically accepted indication is for osteoarthritis of the knee.
Alcohol pads	Use for glucose testing, cleaning application area for topical products, or for cleaning area for non-insulin injectables	The definition of alcohol pads as a Medicare Part D drug requires them to be directly associated with delivering insulin to the body. Alcohol pads not directly associated with the delivery of insulin are not covered by Medicare Part D.

Pharmacies must be aware of Medicare Part D requirements when submitting claims for Medicare Part D beneficiaries. Covered Medicare Part D drugs are prescribed for "medically-accepted indications" i.e., use of medication according to FDA approved labeling or off label use if the drugs are identified as safe and effective for that use in one of the officially recognized drug compendia. Payments for Medicare Part D drugs that are not for medically accepted indications are considered potential fraud or abuse.

All Pharmacy Whisperer communications are available at Elixir's website, under the "Providers" > "Pharmacy Resources" > "Pharmacy Audits" section, at <https://www.elixirsolutions.com/providers>. Please ensure to refer to prior communications to remain in compliance with network requirements. If you have any questions regarding this communication, please contact PharmacyAudits@elixirsolutions.com.

Thank you,

Elixir

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