



MEMO

To: Network Pharmacy
From: Elixir Pharmacy Audit and FWA Team
Date: Monday, October 25th, 2021
RE: The Pharmacy Audit Whisperer – Maintaining Rx Compliance, Medicare Part D focus

Dear Pharmacy:

Following proper dispensing practices and Medicare Part D requirements for claims submissions is essential for success in the Elixir Pharmacy Network. The purpose of this communication is to share some examples of drugs and drug classes found during audits 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 or Drug Classes	Dispensed For	Audit Chargeback Reason
Diclofenac gel 3%	Back pain, osteoarthritis pain	Not a covered Medicare Part D indication. Medicare Part D covered use is for the treatment of actinic keratosis
Novolog® injection 100U/ml	Use with insulin pump	Insulin pump utilization is covered by Medicare Part B unless approved by the Part D plan for a patch like pump such as Omnipod® and V-Go®
Pennsaid® solution 2%	Treatment of osteoarthritis/pain in parts of the body that are not the knee	Not a covered Medicare Part D indication. A medically accepted indication is for osteoarthritis of the knee.
Calcipotriene cream 0.005%	Back pain, dry skin	No medically supported use, not a covered Medicare Part D indication
Alcohol pads	Cleaning area prior to topical product application; use in lieu of hand sanitizer	The definition of a Part D drug includes medical supplies that are 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.
Ivermectin 3mg tablets	COVID-19 treatment, COVID-19 prevention	Not medically supported use, not a covered Medicare Part D indication
Hydroxychloroquine sulfate 200mg tablets	COVID-19 treatment	Not medically supported use, not a covered Medicare Part D indication
Two or more topical corticosteroids, same area	Skin condition	Therapeutic duplication
Two or more oral NSAIDs, concomitant dispensing	Pain	Therapeutic duplication
Antiretrovirals, multiple regimens	HIV treatment	Therapeutic duplication
Topical corticosteroids	Back pain, pain therapy	Not medically supported use, not a covered Medicare Part D indication

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Drug or Drug Classes	Issues Found	Audit Chargeback Reason
Insulin products	Product exchange when not considered interchangeable, no record of prescriber outreach	Wrong drug dispensed
Insulin products	Hard copy prescription describes once daily use, label indicates different frequency or different units to be used	Mislabeled
Renvela® (sevelamer carbonate)	RenageI® (sevelamer HCl) prescribed and Renvela® dispensed, or the opposite	Wrong drug dispensed
Topical products	Incorrect strength or drug form dispensed	Wrong drug dispensed
Compound products	Incorrect calculation(s) that result in strength(s) beyond the acceptable margins per USP 795	Wrong drug dispensed

Pharmacies must be aware of Medicare Part D requirements when submitting claims for Part D beneficiaries. Covered 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 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” > “Bulletins and Communications” section, at <https://www.elixirsolutions.com/providers>. Please make sure to consult all past communications to remain in compliance with network expectations.

If you have any questions regarding this communication, please contact Pharmacyaudits@elixirsolutions.com

Thank you,

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