



To: Network Pharmacy
From: Elixir Pharmacy Audit and FWA Team
Date: Thursday, April 21st, 2022
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.

Provider Services Standards

Pharmacies should be familiar with practices that may constitute a breach of the PPA as listed under the "Suspension and Terminations" section of Elixir's Pharmacy Manual. The Pharmacy Manual is available on Elixir's website. Misrepresenting or falsifying information to obtain a paid claim is not acceptable. It has been observed that drugs requiring prior authorization were inappropriately approved due to misuse of prior authorization electronic platforms.

Regarding Prior Authorizations:

- Pharmacies may not misrepresent patient clinical history information to obtain approval on a prior authorization.
- Under no circumstance may a pharmacy complete a prior authorization for a drug formulary exception or other utilization management rules.
- Pharmacies must notify the member, and/or prescriber regarding the need for a prior authorization.
- Pharmacies may not submit a prior authorization acting as a prescriber through automated prior authorization platforms.

According to CMS guidance, the following are appropriate parties that may request an initial determination for a prior authorization:

- A member
- A member's authorized representative as defined by CMS**
- A member's prescribing physician
- Prescriber's office staff acting on prescriber's behalf.

Authorized representative: "Under Part D, as defined in §423.560 as "appointed representative", an individual either appointed by an enrollee or authorized under state or other applicable law to act on behalf of the enrollee in filing a grievance, obtaining a coverage determination, or in dealing with any of the levels of the appeals process".

Signature Log Requirements

Electronic or manual signature should be recorded at time of pick up or delivery by the member or designated member representative. At a minimum, the record should include the following: Rx number, date of pick up or delivery and signature. The fill date is not sufficient for date of pick up or delivery. For deliveries, the date delivered cannot be pre-printed by the Pharmacy. Please note, Medicare Part D guidance for pick up signature log remains the same as indicated back in early 2020, i.e., if a signature cannot be obtained pharmacies should document "COVID" or "C" as the signature.

Accurate Claims Submission

The following are based on discrepancies found during recent audits and claims review:

- Premarin®, Estrace®, estradiol 0.01% vaginal creams – These creams are supplied with a calibrated plastic applicator for administration. This requires calculable directions, in grams, to determine accurate days' supply.
- Colonoscopy prep solutions – For bowel prep standard use, these should be submitted with days' supply of 1 (one), not 30 (thirty), in order to be accurate.

**The Prescription Drug Benefit Manual Parts C&D Enrollee Grievances, Organization/Coverage Determinations, and Appeals Guidance chapter, section 20.2 – Appointment of Representative (AOR) Form or Equivalent Written Notice.

Audit Extension Requests

Pharmacies are required to provide documents by the dates outlined within the audit correspondence. If an extension is needed, all requests must be submitted via email to PharmacyAudits@elixirsolutions.com at least three (3) days prior to the due date. Extension requests may be approved or denied at Elixir's discretion. Once an audit is closed, additional extensions will not be accepted.

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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