



To: Network Pharmacy
From: Elixir Pharmacy Audit and FWA Team
Date: Friday, October 7th, 2022
RE: The Pharmacy Audit Whisperer

Dear Pharmacy:

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.

Rx Label Requirements

Pharmacies must provide copies of any and all requested records upon audit, including prescription labels, to determine compliance with applicable law, regulation, guidance and the Participating Provider Agreement (PPA). The prescription label must contain at a minimum: pharmacy name and address, fill date, Rx number, patient name, prescriber name, drug name and strength, directions, quantity, and cautionary statements as applicable, unless dictated otherwise by State law.

Example:

| | | |
|---|-----------------------|-----------|
| Pharmacy Name: | Date Filled: MM/DD/YY | Cautions: |
| Phone: | Rx No.: | |
| Purpose: | | |
| Patient Q. Name | | |
| Prescriber: | | |
| Take 1 tablet in the morning and 2 tablets at bedtime. | | |
| Description: | | |
| Drug Name and Strength | | |
| Generic for: | | |
| Qty: | | |
| Use by: MM/DD/YY | | |
| Refills: | | |

Backtags or labels often attached to the back of the prescription hard copy are not considered the prescription label that is placed on the medication dispensed to the patient.

Invoice Reconciliation Audits

Pharmacies should be familiar with audit types and protocols including invoice reconciliation audits in compliance with and as described in the Elixir Pharmacy Manual.

1. Pharmacies must provide wholesaler, manufacturers and distributor invoices as requested by Elixir. It is the responsibility of the Pharmacy to ensure **all** wholesalers, manufacturers and distributors utilized to provide Covered Drugs to Members are lawfully licensed to do so.
2. All wholesaler/distributor invoices or purchase summaries must be submitted directly from the wholesaler for the time frame outlined in the audit request. Documentation received from the Pharmacy will not be accepted for audit consideration.
3. Pharmacy must complete, sign, and provide the **Pharmacy Attestation of Wholesalers** included with the audit request for wholesaler records to be validated and reviewed.
4. Pharmacy must provide comprehensive drug utilization report upon request; this report includes all payers for the NDCs requested (PHI should be redacted). A denial of this request constitutes a denial of access to records.

5. Sourcing and transferring medication inventory from other licensed pharmacies must meet the requirements according to Elixir's Pharmacy Manual as described under section "Wholesaler, Manufacturer, and Distributor Invoices: Requirements and Audits".

Submission of Accurate Claims

As part of invoice reconciliation audits, pharmacies must adhere to the requirements for accurate claims' submission in compliance with Elixir's Pharmacy Manual as described under section titled "Accurate Claim Submission and Prescription Record".

1. The NDC number of the dispensed drug, matching the package size, must be billed to accurately reflect the dispensed product. Billing of similar NDC is not allowed and will be subject to audit chargebacks, according to audit findings.
2. Wholesaler invoices and other drug related records should outline NDCs and drug names to be considered valid.
3. Submitting claims with NDC that differs from the dispensed product package NDC is not allowed and may constitute a breach of the PPA.

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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