

## MEMO

**To:** Network Pharmacy  
**From:** Elixir Pharmacy Audits and FWA Team  
**Date:** Monday, December 16, 2019



### The Pharmacy Audit Whisperer – Maintaining Rx Compliance

Following proper dispensing practices and Medicare Part D requirements for claims submissions is essential for success in the Elixir pharmacy network. Unfortunately, we have seen a recent uptick in the billing of questionable treatments without supported medical uses by some network pharmacies. Such billing and dispensing may cause a delay in proper therapy for the patient, patient harm, and development of antimicrobial resistance. Some examples are below:

- **Medicated toothpaste:** The pharmacy bills for antibiotics and dispenses compounded toothpaste. The patient is instructed to brush teeth with antibiotic-added toothpaste to treat gingivitis. Toothpaste compounded with multiple antibiotics changes the route of administration and strength of the antibiotics. Use of antibiotics in this manner is not supported by medical literature.
- **Medicated foot or hand soaks:** The patient is instructed by the pharmacy to mix antibiotics and antifungals in varied dosage forms with water at home and soak their feet or hands in the solution. The soak is supposed to treat pitted keratolysis, cellulitis, diabetic ulcers, ingrown toenails, and other conditions. The method of administration changes the strength, route of administration and intended use for drugs in question. Use of antibiotics and antifungals in this manner is not supported by medical literature.

**All submitted claims must be for medications with a valid, clinically appropriate use in order to ensure patient safety and treatment with efficacious therapy.** Please remember that Elixir considers the following documents anecdotal evidence and, therefore, are not suitable to support claim billing:

- white papers not published in peer-review journals
- clinical trial applications;
- studies that show drug effectiveness for strength or route of administration that doesn't match the one of the dispensed drug;
- individual case reports; and
- small studies with controversial results across the spectrum of literature available.

As indicated in the Elixir Pharmacy Manual, pharmacies must provide clinical evidence supporting the therapeutic value of billed therapy if requested during an audit. The Elixir Pharmacy Manual is available at [https://www.elixirsolutions.com/hubfs/Elixir/Documents/Pharmacy%20Manual\\_20-4840\\_pf1.pdf](https://www.elixirsolutions.com/hubfs/Elixir/Documents/Pharmacy%20Manual_20-4840_pf1.pdf). Additionally, 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: American Hospital Formulary Service - Drug Information (AHFS-DI) and DRUGDEX® Information System. Payments for Part D drugs that are not for medically accepted indications are considered potential fraud or abuse.

If you have any questions regarding this communication, please contact [PharmacyAudits@elixirsolutions.com](mailto:PharmacyAudits@elixirsolutions.com)

Thank you,  
 Elixir