



Pharmacy Alliance

POLICY ANALYSIS

State by State Formulary Variability In Medicare Prescription Drug Plans for Auto-Assigned Long-Term Care Residents

February 2007

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Long Term Care Pharmacy Alliance

For Public Release February 19, 2007

State by State Analysis of Medicare Part D Finds Low-Income Nursing Home Residents Have a Poor Chance of Being Enrolled in the Best Available Drug Plans

Most Could Be Enrolled in a Better Plan at No Cost If They Were Allowed to Receive Help From Their Caregivers

Washington -- An analysis released today by the Long Term Care Pharmacy Alliance (LTCPA) finds most low-income nursing home residents have a poor chance of being enrolled in the Medicare Part D plan that best covers their medications – and most could immediately switch to a better plan at no cost if they were allowed to receive help from their caregivers.

Under the Medicare Part D prescription drug program, low-income nursing home residents who are "dual eligible" for both Medicare and Medicaid are qualified to have their medicines covered at no cost as long they are enrolled in one of several drug plans recognized as "below benchmark" in cost by the federal government's Centers for Medicare & Medicaid Services (CMS).

The LTCPA analysis finds those below benchmark plans vary greatly in terms of the drugs they cover and the restrictions they put on access to those medicines. Using the online plan finder CMS provides to beneficiaries to evaluate drug plans, LTCPA compared how below benchmark plans covered 10 drugs commonly prescribed to long-term care residents. The results varied dramatically from very good to very poor.

In New York, for example, there are roughly 80,000 low income nursing home residents who can choose to be enrolled in any of 13 below benchmark plans.

- 3 of those 13 plans cover all 10 drugs, and have restrictions such as requiring prior authorization or step therapy on only one drug.
- 10 of those 13 plans do not cover all drugs, with 2 of the plans not covering 4 of these drugs; and requiring prior authorization or step therapy for an additional 4 drugs.

No single drug plan is best for all nursing home residents all the time. Recognizing that, the Part D program allows low-income nursing home residents to choose among any below benchmark plan, and to switch plans monthly in order to guarantee the best coverage. In spite of the ability to select and change plans, few frail elderly nursing home residents do so. Because nursing home residents are typically very elderly and in poor physical and mental health, most lack the ability to evaluate, choose and enroll in a Part D plan on their own.

To ensure nursing home residents receive some drug coverage, the federal government automatically assigns a plan to all low-income beneficiaries who fail to choose one on their own. Those beneficiaries are evenly – and randomly – distributed among all below benchmark cost plans in the region. That assignment is made without any attempt to match beneficiaries to the plan that best covers their drugs. As a result, while most regions have below benchmark cost plans available to cover all or most of a beneficiary's medicines with few restrictions, the odds are poor that they will be randomly assigned to that particular plan.

Making things worse, it is current federal policy that "under no circumstances should a nursing home require, request, coach or steer any resident to select or change a plan for any reason." The same prohibition has been applied to other caregivers including pharmacists, nursing home staff and physicians.

"Hundreds of thousands of frail low-income nursing home residents in this country only need a little help to be enrolled in a Part D plan that better covers their medications. Yet, they are denied having the people they trust to care for them – their nurses, physicians and pharmacists – give them that help," said LTCPA Executive Director Paul Baldwin. "It is unreasonable and unacceptable that so many nursing home residents are stuck in drug plans that don't fully cover their medicines when the only thing standing in their way is bad federal policy. Their health should not be left to random chance."

The Long Term Care Pharmacy Alliance represents pharmacies that specialize in providing medicines to over one million of the nation's long-term care residents.

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State by State Formulary Variability in Medicare Prescription Drug Plans for Auto-Assigned Long-Term Care Residents

December 14, 2006

Implementation of the Medicare Modernization Act (MMA) resulted in moving drug coverage responsibility for the vast majority of residents of long-term care (LTC) facilities from Medicaid to Medicare Prescription Drug Plans (PDPs). Since 65 percent of nursing home residents are dually-eligible for Medicare and Medicaid¹, these beneficiaries are now subject to formularies developed by PDPs, rather than the access provisions of Omnibus Budget Reconciliation Act of 1990 (OBRA'90)², which applied to Medicaid and which generally provided reliable access to prescription drug coverage for LTC residents.

In order to ensure that dual-eligibles did not experience gaps in coverage during the transition from Medicaid to Part D, the MMA contains a provision³ requiring the Centers for Medicare and Medicaid Services (CMS) to auto-enroll these beneficiaries into plans with premiums at or below the regional benchmark. This provision has resulted in dual-eligible residents of a single LTC facility being randomly auto-enrolled into any one of a number of PDPs.

Increased Options: Since the selection of plans eligible to receive auto-enrolled beneficiaries was based solely on premium costs and not on formulary compatibility, there would naturally be a high likelihood that beneficiaries would be assigned to plans that did not include access to the drugs they need.

The Department of Health and Human Services, Office of Inspector General (OIG) confirmed this by reporting⁴ that dual-eligibles across the nation could be enrolled in 409 PDPs using 37 different formularies in 2006. The number of available plans for auto-enrollment of dual-eligibles in 2007 increased to 483, further complicating an already complex landscape of beneficiary assignment.

¹ Kaiser Family Foundation; StateHealthfacts.org , December, 2006

² PL 101-508

³ PL 108-173§103 (b) (1) (c)

⁴ Dept. of Health and Human Services, Office of Inspector General, <u>Dual Eligibles' Transition: Part D</u> <u>Formularies' Inclusion of Commonly-used Drugs</u>. January, 2006

The OIG, in its analysis, notes that "[R]andom assignment to PDPs may affect the number of dual eligibles who take a specific drug that is not included on their PDP's formulary."⁵

The report goes on to note that 18 percent of dual eligibles in the OIG survey were assigned to plans that included all of the top 178 drugs eligible for Medicare drug coverage, while 30 percent were enrolled in plans that included less than 85 percent of the top drugs. Clearly, large numbers of dual-eligible LTC residents have been auto-enrolled in plans that do not cover all the drugs they need.

Implications: CMS regulations allow residents of LTC facilities to change plan enrollment as often as they wish through a special enrollment period (SEP). This SEP also applies to dual eligibles. So, if a beneficiary is enrolled in a plan that is not appropriate for her drug regimen, she has the right to change plans. As a practical matter, the change can take place once per month and the new enrollment is not effective until the first of the following month, or perhaps later, depending on how close to the end of the month the change is made.

The provisions of the Medicare Marketing Guidelines⁶ prohibit either pharmacy personnel or nursing home personnel from offering advice to beneficiaries on plan selection or assistance in enrollment. CMS believes that caregivers may have incentives to persuade beneficiaries to enroll in plans that offer superior benefits to the provider, in terms of reimbursement or convenience, rather than those that are best for the beneficiary.

CMS signaled its intent to enforce this provision by issuing a guidance document from the Survey and Certification Group within the Center for Medicaid and State Operations⁷. This document advises state survey agencies that they need to be aware of efforts to "steer" beneficiaries to plans. Although the context of this directive seems to involve cases in which beneficiaries have chosen a particular plan, not where they have been auto-assigned, instructions to state surveyors are clear:

"Under no circumstances should a nursing home require, request, coach or steer any resident to select or change a plan for any reason."⁸

Summary of the Formulary Comparison Study: In order to compare the formulary designs of PDPs whose premiums render them eligible for participation in the auto-enrollment process, we created a drug regimen consisting of ten drugs frequently prescribed for nursing home residents. These drugs treat a

⁵ Ibid

⁶ Centers for Medicare and Medicaid Services, <u>Medicare Marketing Guidelines for: Medicare Advantage</u> <u>Plans; Medicare Advantage Prescription Drug Plans; and Prescription Drug Plans</u>, revised July 25, 2006

⁷ Centers for Medicare and Medicaid Services, Center for Medicaid and State Operations, Survey and Certification Group. Memo to State Survey Agency Directors, S&C 06-16 May 11, 2006

⁸ Ibid

variety of conditions common among the very elderly and are listed as preferred agents by institutional pharmacies.

These drugs were compared, using the CMS Plan Finder⁹, against plan formularies in each of the 34 CMS PDP Regions for those plans eligible to accept auto-enrolled beneficiaries. The possible outcomes of the search could include:

- On formulary, without restriction
- On formulary, but subject to prior authorization or step therapy¹⁰
- Not on formulary

As the following analysis demonstrates, the variability of access between plans for these drugs is quite significant. Often, we find that there are two or more plans with relatively few, if any, restrictions. Similarly, there are a few plans with several drugs not available and several more with restrictions.

Conclusion: Assigning dual-eligible LTC residents to Part D plans randomly can produce a large variation in individual access to appropriate therapies. As a result, nursing home staff, prescribers and pharmacy staff will be required to intervene to either obtain the plan authorization or to request a medical exception or to change the beneficiary to alternative medicines in place of drugs that may have demonstrated effectiveness over long periods.

The implementation of Part D in the LTC setting has, as one might expect, resulted in significant operational challenges physicians, nursing facilities and pharmacies as they attempt to provide needed medicines to these residents. Most commercial health plans have little, if any, previous experience with this population and virtually all pharmacies have been required to add staff to navigate plan access provisions in order to provide services under Part D.

Our analysis demonstrates that, under the auto-enrollment process, many duallyeligible nursing home residents are at risk for assignment to plans that are inadequate for their medical needs. Further, current CMS policies limit the ability of caregivers to help beneficiaries enroll in more appropriate plans.

Information Sources: As noted above, plan formularies were obtained through the Medicare Plan Finder. Statistical information on the number of nursing home residents and dual-eligibility was obtained from the state health facts web site of the Kaiser Family Foundation¹¹ and is based on 2005 information.

⁹ www.medicare.gov

¹⁰ Step therapy requirements deny the use of the selected drug until/unless a preferred alternative has been tried and found not to have been successful.

¹¹ Op cit, Kaiser Family Foundation

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Long Term Care **Pharmacy Alliance**

Region 1: Maine and New Hampshire

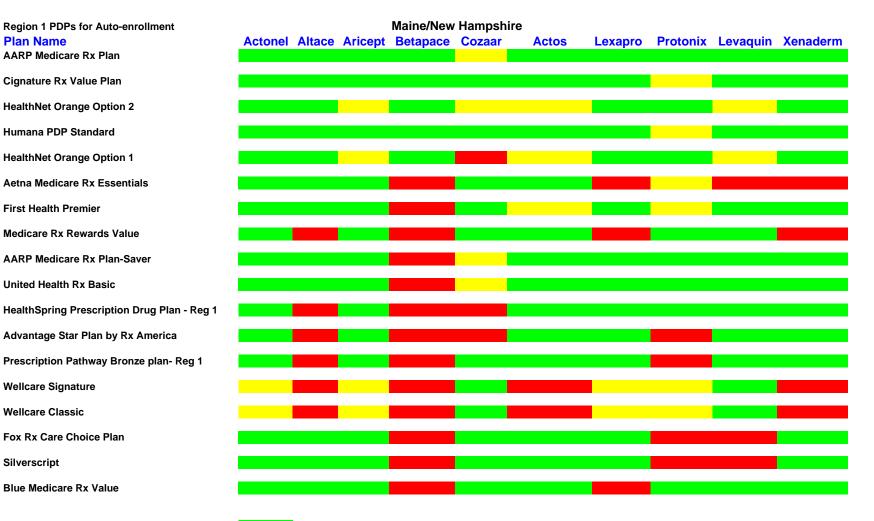
Nursing Home Residents:	Maine: <u>New Hampshire:</u>	6,380 <u>6,597</u>
	Total:	12,977
Number of Dual Eligible Residents:	Maine:	4,275 (67%)
	New Hampshire:	4,354 (66%)
	Total:	8,629
Number of Nursing Homes:	Maine:	106
_	New Hampshire:	76
	Total:	182
Number of PDPs below the Benchma	18	

Number of PDPs below the Benchmark:

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- 3 Plans cover all drugs, but require prior authorization (PA) or step therapy for one drug
- One plan covers all drugs, but requires PA or step therapy for four drugs
- 10 plans do not cover all drugs, with two plans not covering 4 of these drugs and requiring PA or step therapy for an additional 4 drugs



On formulary; no restriction Requires prior authorization or step therapy Not covered



Region 2: Connecticut, Massachusetts, Rhode Island, Vermont

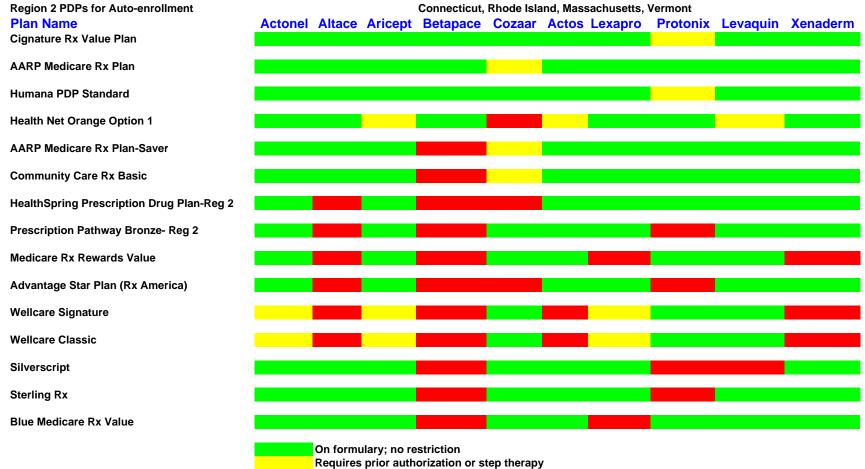
Nursing Home Residents:	Connecticut: Massachusetts: Rhode Island: Vermont: Total:	25,571 42,127 7,804 2,855 78,357
Number of Dual Eligible Residents	Connecticut: Massachusetts: Rhode Island: <u>Vermont:</u> Total:	16,621 (65%) 27,383 (65%) 5,229 (67%) 1,884 (66%) 51,117
Number of Nursing Homes:	Connecticut: Massachusetts: Rhode Island: Vermont: Total:	227 432 84 <u>36</u> 779
Number of PDPs below Benchmark:		15

The Attached chart shows a list of 10 commonly-used drugs in the long-term

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
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Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- 3 Plans cover all drugs, but require prior authorization (PA) or step therapy for one drug
- 12 plans do not cover all drugs, with two plans not covering 4 of these drugs and requiring PA or step therapy for an additional 4 drugs



Not covered



Region 3: Nev	w York
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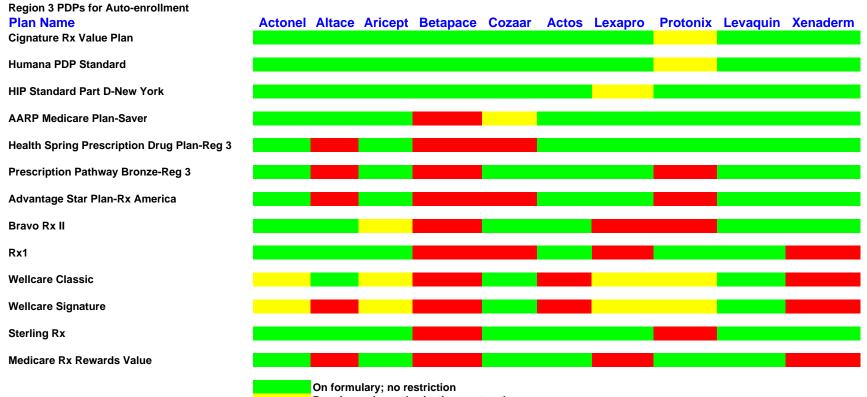
Nursing Home Residents:	109,543
Number of Dual Eligible Residents:	79,966
Number of Nursing Homes:	635
Number of PDPs below Benchmark:	13

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- 3 Plans cover all drugs, but require prior authorization (PA) or step therapy for one drug
- 10 plans do not cover all drugs, with two plans not covering 4 of these drugs and requiring PA or step therapy for an additional 4 drugs

New York



Requires prior authorization or step therapy

Not covered



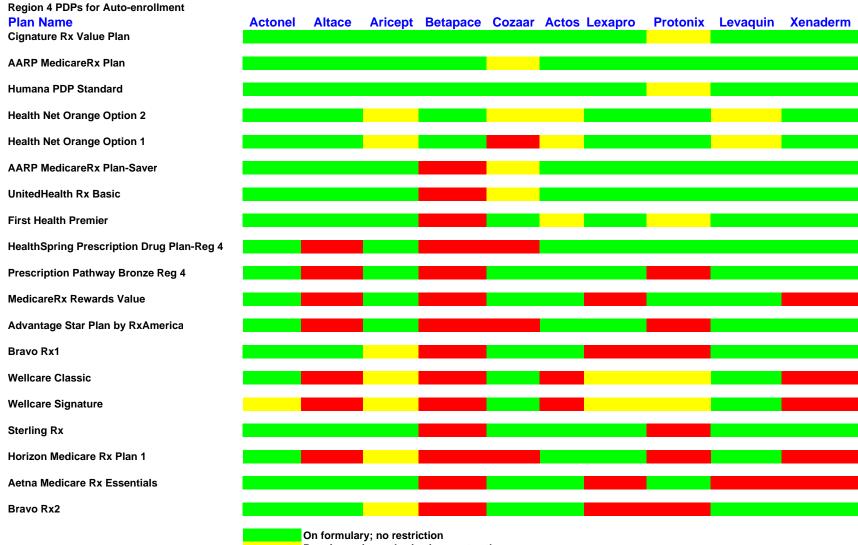
Region 4: New Jersey

Nursing Home Residents:	42,075
Number of Dual Eligible Residents:	27,349
Number of Nursing Homes:	341
Number of PDPs below Benchmark:	19

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- 3 Plans cover all drugs, but require prior authorization (PA) or step therapy for one drug
- One plan covers all drugs, but requires PA or step therapy for four drugs
- 15 plans do not cover all drugs, with two plans not covering 4 of these drugs and requiring PA or step therapy for an additional 4 drugs.
- One plan does not cover 5 of these drugs.



New Jersey

Requires prior authorization or step therapy Not covered





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Region 5: District of Columbia, Maryland, Delaware

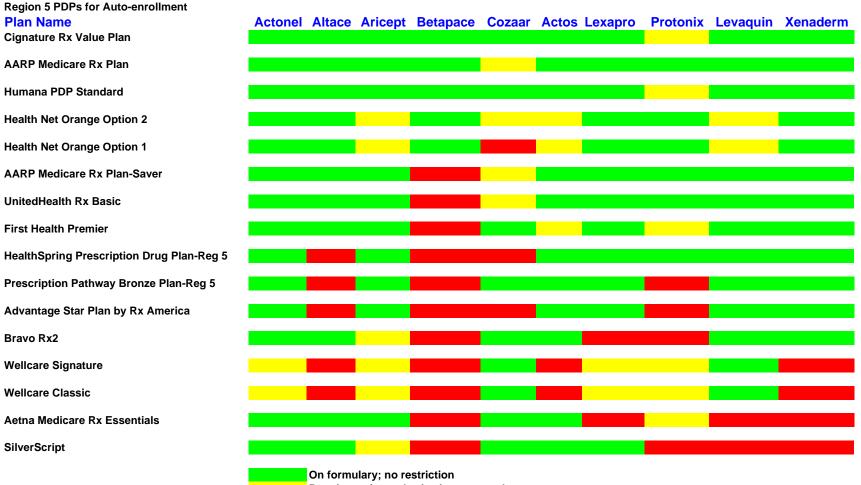
Nursing Home Residents:	DC: Maryland: <u>Delaware:</u> Total	2,904 24,164 <u>3,799</u> 30,867
Number of Dual Eligible Residents:	DC: Maryland: <u>Delaware:</u> Total	2,178 (74%) 14 740 (61%) <u>2,241 (</u> 59%) 19,159
Number of Nursing Homes:	DC: Maryland: <u>Delaware:</u> Total	20 228 <u>41</u> 289
Number of PDPs below Benchmark:		16

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- 3 Plans cover all drugs, but require prior authorization (PA) or step therapy for one drug
- One plan covers all drugs, but requires PA or step therapy for four drugs
- 12 plans do not cover all drugs, with two plans not covering 4 of these drugs and requiring PA or step therapy for an additional 4 drugs.

DC, Delaware, Maryland



Requires prior authorization or step therapy Not covered



Region 6: Pennsylvania and West Virginia

Number of Nursing Home Residents:	Pennsylvania: <u>West Virginia:</u> Total:	77,679 8,679 86,358
Number of Dual-Eligible Residents:	Pennsylvania: West Virginia: Total:	48,938(63%) 6,336(73%) 55,274
Number of Nursing Homes:	Pennsylvania: <u>West Virginia:</u> Total:	702 120 822
Number of PDPs below Benchmark:		20

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- 3 Plans cover all drugs, but require prior authorization (PA) or step therapy for one drug
- One plan covers all drugs, but requires PA or step therapy for four drugs
- 16 plans do not cover all drugs, with four plans not covering 6 of the ten drugs



Pennsylvania, West Virginia

On formulary; no restriction Requires prior authorization or step therapy Not covered



Region 7: Virginia

Number of Nursing Home Residents:	25,065
Number of Dual-eligible Residents:	15,791 (63%)
Number of Nursing Homes:	248
Number of PDPs below the Benchmark:	17

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- 3 Plans cover all drugs, but require prior authorization (PA) or step therapy for one drug
- One plan covers all drugs, but requires PA or step therapy for four drugs
- 13 plans do not cover all drugs, with 6 plans not covering 4 of the ten drugs

Virginia

Plan Name

SilverScript



On formulary; no restriction Requires prior authorization or step therapy Not covered



Region 8: North Carolina

Number of Nursing Home Resident:	36,330
Number of Dual-eligible Residents:	25,431 (70%)
Number of Nursing Homes:	403
Number of PDPs below the Benchmark:	14

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- 3 Plans cover all drugs, but require prior authorization (PA) or step therapy for one drug
- One plan covers all drugs, but requires PA or step therapy for four drugs
- 10 plans do not cover all drugs, with 4 plans not covering 4 of the ten drugs

North Carolina



Not covered



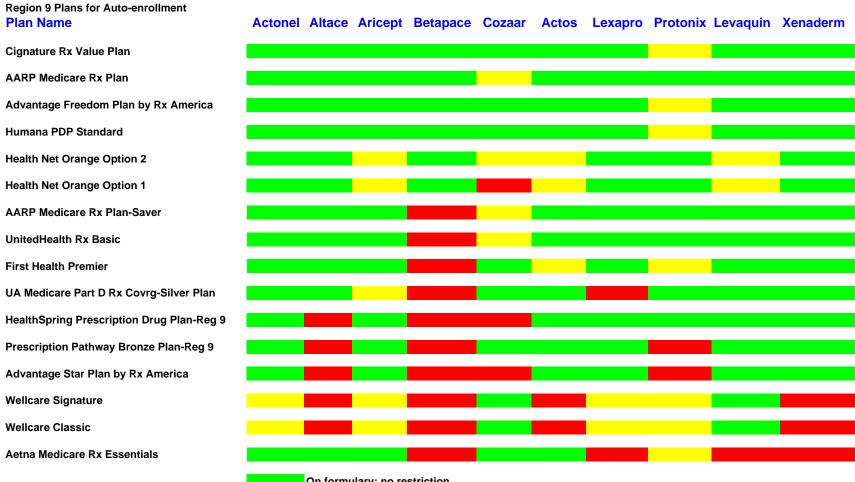
Region 9: South Carolina

Number of Nursing Home Residents:	15,487
Number of Dual-eligible Residents:	10,841 (70%)
Number of Nursing Homes:	162
Number of PDPs below the Benchmark:	16

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- 4 Plans cover all drugs, but require prior authorization (PA) or step therapy for one drug
- One plan covers all drugs, but requires PA or step therapy for four drugs
- 11 plans do not cover all drugs, with 4 plans not covering 4 of the ten drugs



South Carolina

On formulary; no restriction Requires prior authorization or step therapy Not covered



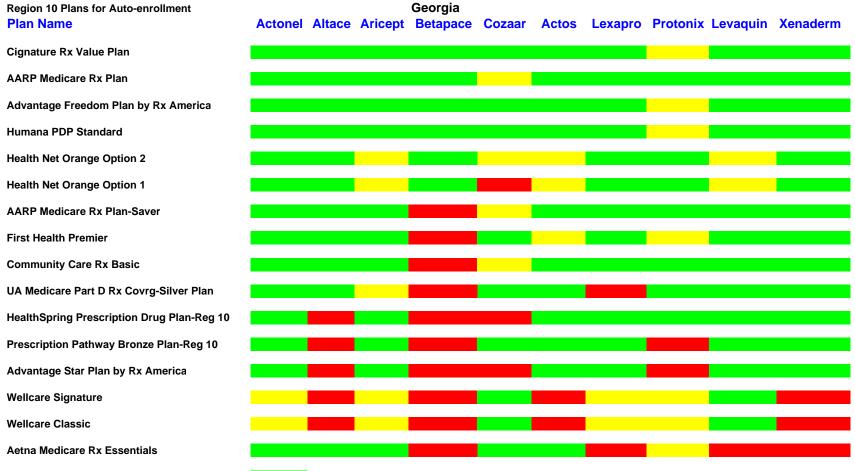
Region 10: Georgia

Number of Nursing Home Residents:	33,907
Number of Dual-eligible Residents:	25,769 (76%)
Number of Nursing Homes:	338
Number of PDPs below Benchmark:	16

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- 4 Plans cover all drugs, but require prior authorization (PA) or step therapy for one drug
- One plan covers all drugs, but requires PA or step therapy for four drugs
- 11 plans do not cover all drugs, with 4 plans not covering 4 of the ten drugs



On formulary; no restriction Requires prior authorization or step therapy Not covered



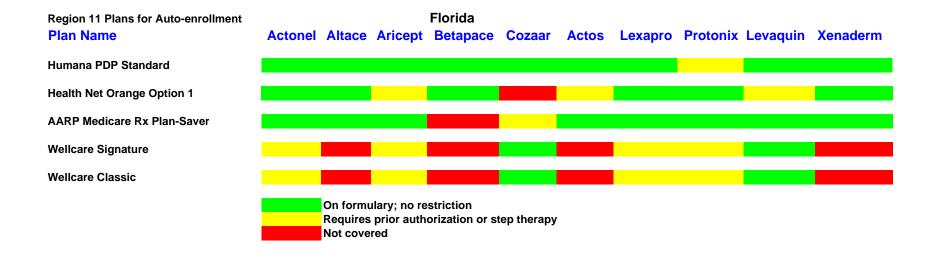
Region 11: Florida

Number of Nursing Home Residents:	66,209
Number of Dual-eligible Residents:	39,725
Number of Nursing Homes:	626
Number of PDPs below Benchmark:	5

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- One plan covers all drugs, but applies prior authorization (PA) or step therapy to one drug
- Four plans do not cover all drugs, with four plans not covering 4 of the ten selected.





Region 12: Alabama and Tennessee

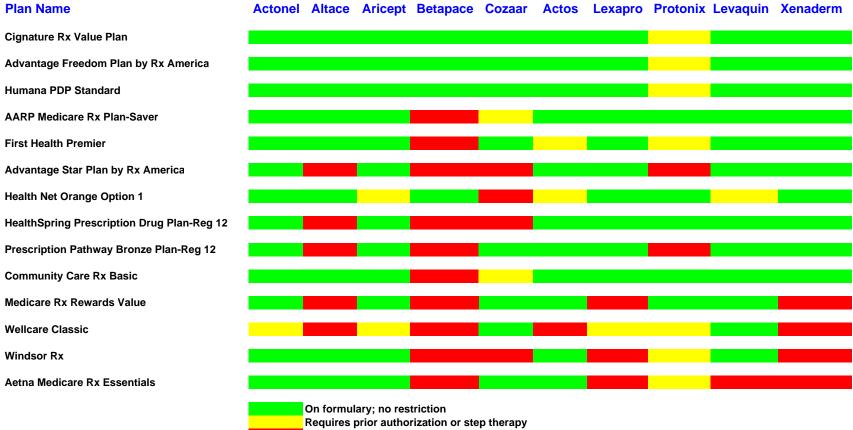
Number of Nursing Home Residents:	Alabama: <u>Tennessee:</u> Total:	15,678 <u>30,881</u> 46,559
Number of Dual-eligible Residents:	Alabama: <u>Tennessee:</u> Total:	11,131 (71%) <u>21,308</u> (69%) 33,039
Number of Nursing Homes:	Alabama: <u>Tennessee:</u> Total:	163 <u>308</u> 471
Number PDPs below Benchmark:		14

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Three plans cover all drugs, but require prior authorization (PA) or step therapy for one.
- 11 Plans do not cover all drugs, with 4 plans not covering 4 of the 10 drugs selected.

Alabama/Tennessee



Not covered

Region 12 Plans for Auto-enrollment



Region 13: Michigan

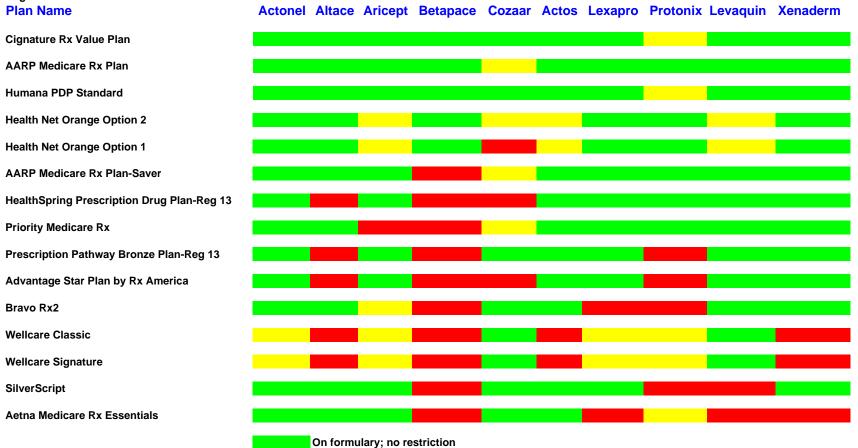
Number of Nursing Home Residents:	39,880
Number of Dual-eligible Residents:	26,321 (66%)
Number of Nursing Homes:	407
Number of PDPs below Benchmark:	15

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

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Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Three plans cover all drugs, but apply prior authorization (PA) or step therapy to one.
- One plan covers all drugs but applies PA or step therapy to four drugs
- 11 Plans do not cover all drugs, and four plans do not cover four of the ten drugs selected

Michigan



Region 13 Plans for Auto-enrollment **Plan Name**

Wellcare Signature

SilverScript

Bravo Rx2

Aetna Medicare Rx Essentials

Requires prior authorization or step therapy Not covered



Region 14: Ohio

Number of Nursing Home Residents:	71,174
Number of Dual-eligible Residents:	46,263 (65%)
Number of Nursing Homes:	864
Number of PDPs below Benchmark:	13

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

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Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- One plan covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- 12 Plans do not cover all drugs, with four plans not covering four of the drugs selected.



Region 14 Plans for Auto-enrollment

Ohio



Region 15: Indiana and Kentucky

Number of Nursing Home Residents:	Kentucky: Indiana: Total	23,253 <u>36,499</u> 59,752
Number of Dual-eligible Residents:	Kentucky: <u>Indiana:</u> Total:	15,580 (67%) <u>22,629</u> (62%) 38,209
Number of Nursing Homes:	Kentucky: <u>Indiana:</u> Total:	295 <u>468</u> 763
Number of PDPs below Benchmark:		16

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Three plans covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- One Plan covers all drugs, but requires PA or step therapy on four drugs
- 12 plans do not cover all drugs, with four plans not covering four of the 10 drugs selected.

Region 15 Plans for Auto-enrollment Plan Name Actonel Altace Aricept Betapace Cozaar Actos Lexapro Protonix Levaquin Xenaderm Cignature Rx Value Plan Humana PDP Standard AARP Medicare Rx Plan Health Net Orange Option 2 Blue Medicare Rx Value AARP Medicare Rx Plan-Saver Health Net Orange Option 1 Medicare Rx Rewards Value Community Care Rx Basic HealthSpring Prescription Drug Plan-Reg 15 First Health Premier Prescription Pathway Bronze Plan-Reg 15 Advantage Star Plan by Rx America SilverScript Wellcare Classic Wellcare Signature

Indiana/Kentucky



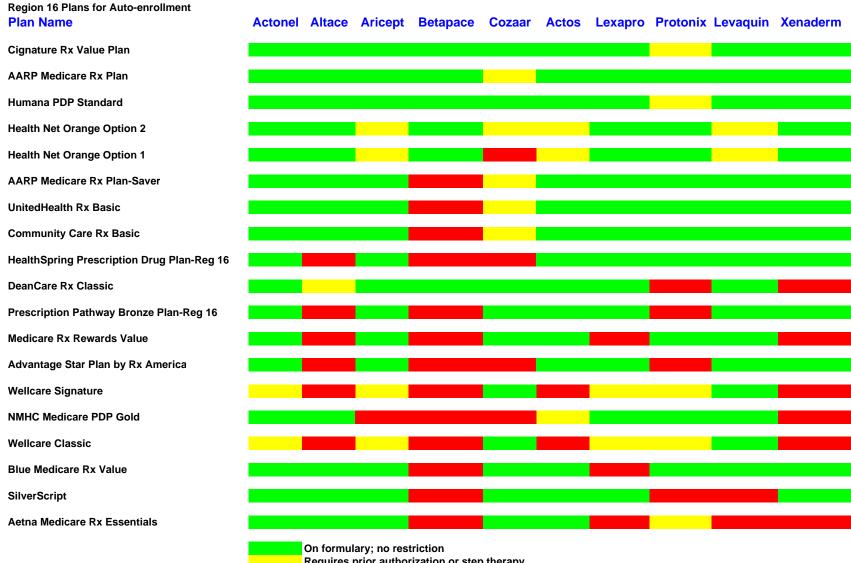
Region 16: Wisconsin

Number of Nursing Home Residents:	31,891
Number of Dual-eligible Residents:	20,410 (64%)
Number of Nursing Homes:	379
Number PDPs below the Benchmark:	19

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Three plans covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- One Plan covers all drugs, but requires PA or step therapy on four drugs
- 15 plans do not cover all drugs, with six plans not covering four of the 10 drugs selected.



Wisconsin

Requires prior authorization or step therapy Not covered



Region 17: Illinois

Number of Nursing Home Residents:	72,298
Number of Dual-eligible Residents:	45,548 (63%)
Number of Nursing Homes:	749
Number of PDPs below Benchmark:	17

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Three plans covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- One Plan covers all drugs, but requires PA or step therapy on four drugs
- 13 plans do not cover all drugs, with six plans not covering four of the 10 drugs selected.

Region 17 Plans for Auto-enrollment Plan Name Actonel Altace Aricept Betapace Cozaar Actos Lexapro Protonix Levaquin Xenaderm Cignature Rx Value Plan AARP Medicare Rx Plan Humana PDP Standard Health Net Orange Option 2 Health Net Orange Option 1 AARP Medicare Rx Plan-Saver UnitedHealth Rx Basic HealthSpring Prescription Drug Plan-Reg 17 Prescription Pathway Bronze Plan-Reg 17 Advantage Star Plan by Rx America Wellcare Signature Wellcare Classic Bravo Rx2 Bravo Rx1 SilverScript Aetna Medicare Rx Essentials

Illinois



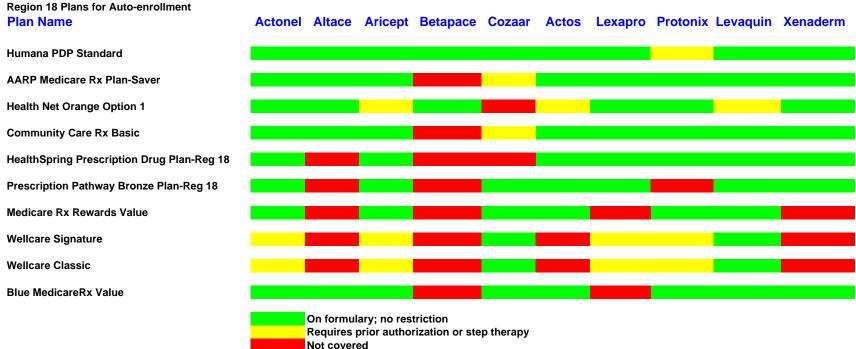
Region 18: Missouri

Number of Nursing Home Residents:	35,684
Number of Dual-eligible Residents:	22,838 (64%)
Number of Nursing Homes:	491
Number of PDPs below the Benchmark:	10

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- One plan covers all drugs, but requires prior authorization (PA) or step therapy for one drug.
- Nine plans do not cover all drugs, and three plans do not cover 4 of the ten drugs selected.



Missouri



Region 19: Arkansas

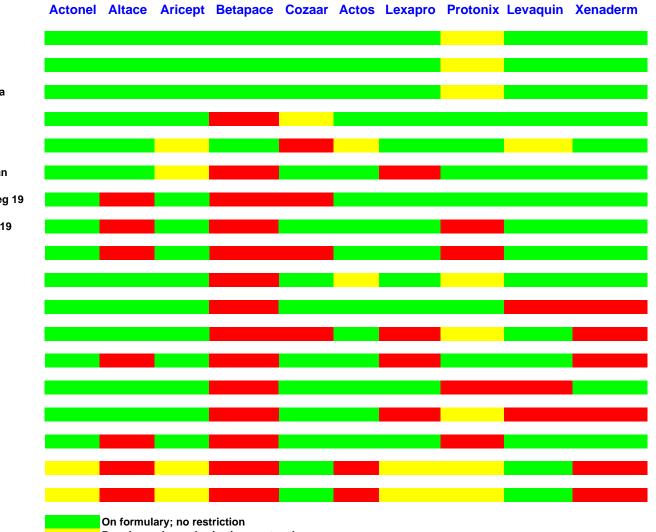
Number of Nursing Home Residents:	17,305
Number of Dual-eligible Residents:	12,287 (71%)
Number of Nursing Homes:	235
Number of PDPs below the Benchmark:	18

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Three plans covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- 15 plans do not cover all drugs, with six plans not covering four of the 10 drugs selected.

Arkansas



Region 19 Plans for Auto-enrollment Plan Name

Cignature Rx Value Plan Humana PDP Standard Advantage Freedom Plan by Rx America AARP Medicare Rx Plan-Saver Health Net Orange Option 1 UA Medicare Part D Rx Covrg-Silver Plan HealthSpring Prescription Drug Plan-Reg 19 Prescription Pathway Bronze Plan-Reg 19 Advantage Star Plan by Rx America First Health Premier Fox Rx Care Choice Plan Windsor Rx Medicare Rx Rewards Value SilverScript Aetna Medicare Rx Essentials Medi-Pak Rx Basic Wellcare Signature Wellcare Classic



Region 20: Mississippi

Number of Nursing Home Residents:	15,490
Number of Dual-eligible Residents:	11,772 (76%)
Number of Nursing Homes:	198
Number of PDPs below the Benchmark:	15

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Four plans covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- 11 plans do not cover all drugs, with five plans not covering four of the 10 drugs selected.

Mississippi Actonel Altace Aricept Betapace Cozaar Actos Lexapro Protonix Levaquin Xenaderm

Region 20 Plans for Auto-enrollment





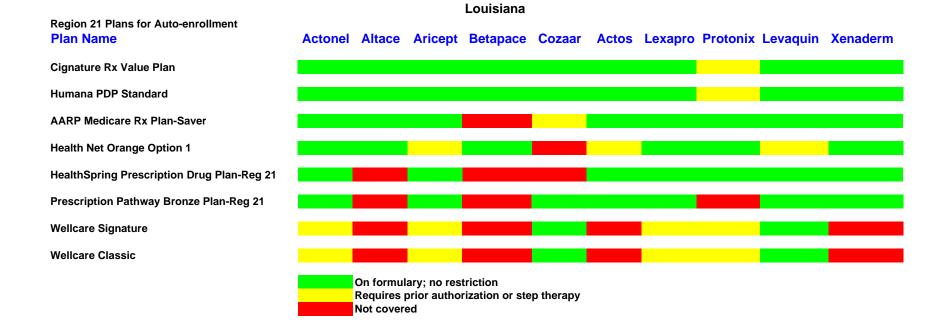
Region 21: Louisiana

Number of Nursing Home Residents:	25,569
Number of Dual-eligible Residents:	19,944 (78%)
Number of Nursing Homes:	272
Number of PDPs below the Benchmark:	8

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Two plans covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- Six plans do not cover all drugs, with two plans not covering four of the 10 drugs selected.





Region 22: Texas

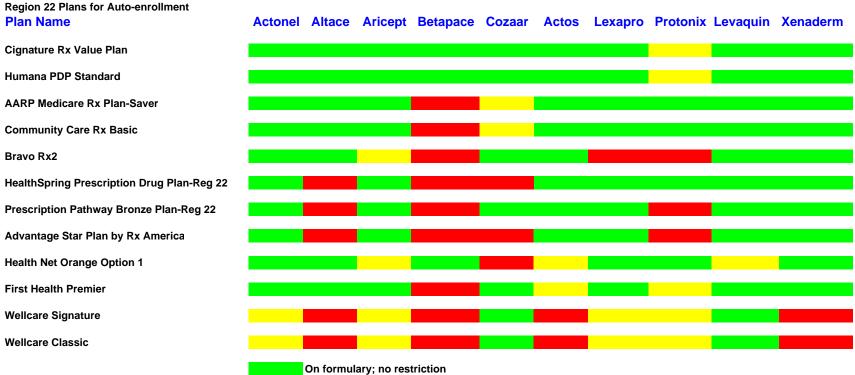
Number of Nursing Home Residents	84,104
Number of Dual-eligible Residents	57,191
Number of Nursing Homes	1,074
Number of PDPs below the Benchmark:	12

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Two plans covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- 10 plans do not cover all drugs, with three plans not covering four of the 10 drugs selected.

Texas





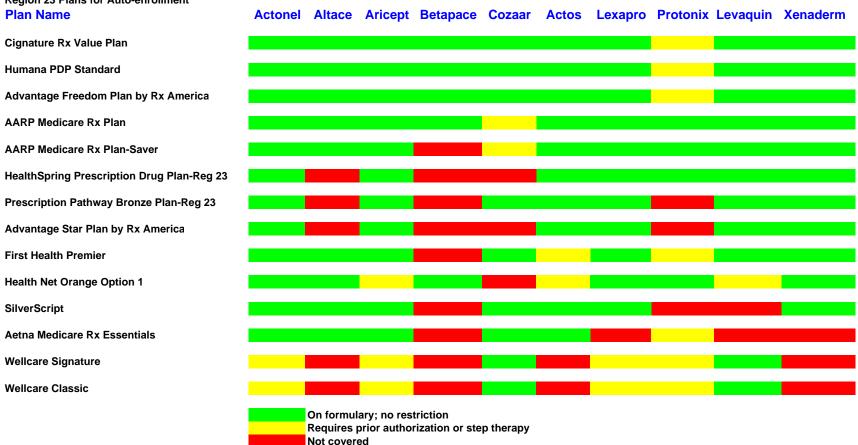
Region 23: Oklahoma

Number of Nursing Home Residents	20,580
Number of Dual-eligible Residents:	13,377
Number of Nursing Homes	345
Number of PDPs below Benchmark:	14

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Four plans covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- 10 plans do not cover all drugs, with four plans not covering four of the 10 drugs selected.



Region 23 Plans for Auto-enrollment

Humana PDP Standard

AARP Medicare Rx Plan

Oklahoma



Region 24: Kansas

Number of Nursing Home Residents:	19,684
Number of Dual-eligible Residents:	10,629 (54%)
Number of Nursing Homes	349
Number of PDPs below Benchmark:	16

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Four plans covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- 12 plans do not cover all drugs, with four plans not covering four of the 10 drugs selected.

Region 24 Plans for Auto-enrollment Plan Name Actonel Altace Aricept Betapace Cozaar Actos Lexapro Protonix Levaquin Xenaderm Cignature Rx Value Plan Humana PDP Standard Advantage Freedom Plan by Rx America AARP Medicare Rx Plan AARP Medicare Rx Plan-Saver Health Net Orange Option 1 Health Net Orange Option 2 First Health Premier Blue MedicareRx Value Prescription Pathway Bronze Plan-Reg 24 HealthSpring Prescription Drug Plan-Reg 24 Medicare Rx Rewards Value SilverScript Aetna Medicare Rx Essentials Wellcare Signature Wellcare Classic

Kansas



Region 25: Iowa, Minnesota, North Dakota, South Dakota, Montana, Nebraska, Wyoming

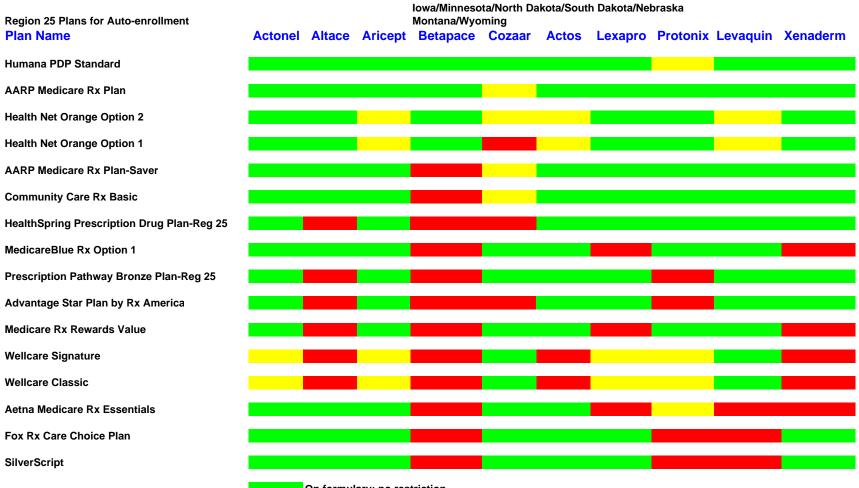
Number of Nursing Home Residents:	Minnesota: North Dakota South Dakota Montana Iowa Nebraska Wyoming Total	29,526 5,768 6,360 4,883 26,057 12,480 2,205 87,279
Number of Dual-eligible Residents	Minnesota: North Dakota South Dakota Montana Iowa Nebraska Wyoming Total	17,125 (58%) 3,230 (56%) 3,498 (55%) 2,686 (57%) 13.028 (50%) 7,114 (54%) 1,323 (60%) 48,004 (57%)
Number of Nursing Homes:	Minnesota North Dakota Wyoming Montana Iowa Nebraska <u>South Dakota</u> Total	356 78 36 88 435 215 107 1,317
Number of PDPs below Benchmark:	16	

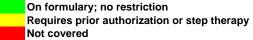
The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease

Betapace:Treatment of abnormal heart rhythmCozaar:Treatment of high blood pressureActos:Treatment of non-insulin dependent diabetesLexapro:Treatment of depressionProtonix:Treatment of gastric refluxLevaquin:Treatment of certain types of infectionXenaderm:Treatment of wounds

- Two plans covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- One plan covers all drugs, but requires PA or step therapy for four drugs
- 13 plans do not cover all drugs, with five plans not covering four of the 10 drugs selected.







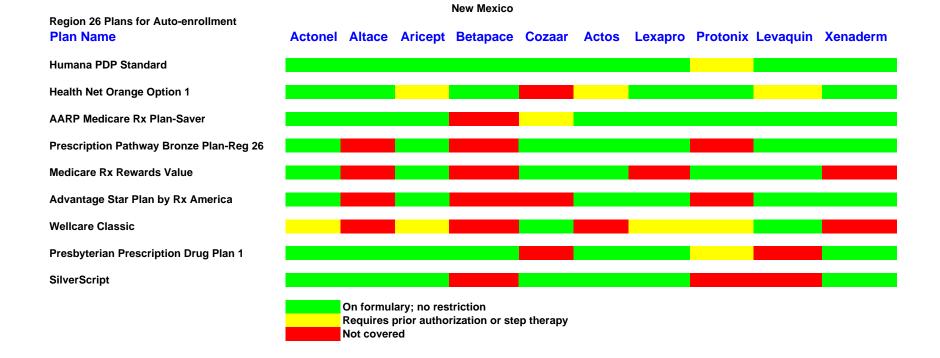
Region 26: New Mexico

Number of Nursing Home Residents:	5,494
Number of Dual-eligible Residents:	3,681 (67%)
Number of Nursing Homes	68
Number of PDPs below Benchmark:	9

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- One plan covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- 8 plans do not cover all drugs, with three plans not covering four of the 10 drugs selected.





Region 27: Colorado

Number of Nursing Home Residents:	15,852
Number of Dual-eligible Residents:	9,353 (59%)
Number of Nursing Homes	203
Number of PDPs below Benchmark:	15

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Two plans covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- One plan covers all drugs, but requires PA or step therapy for four drugs
- 12 plans do not cover all drugs, with five plans not covering four of the 10 drugs selected.



Colorado



Region 28: Arizona

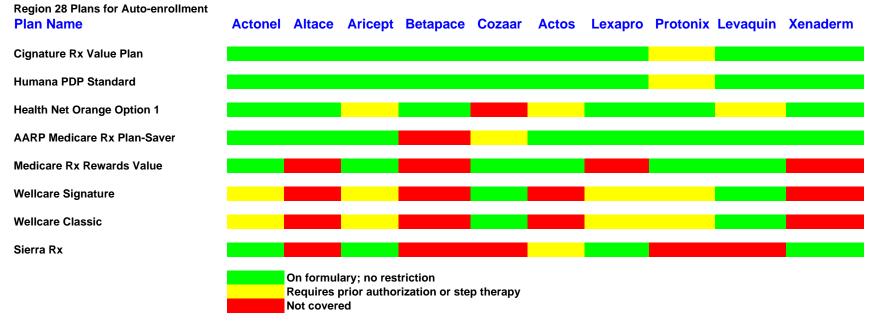
Number of Nursing Home Residents:	8,618
Number of Dual-eligible Residents:	5,516 (64%)
Number of Nursing Homes:	87
Number of PDPs below the Benchmark:	8

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Two plans covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- Six plans do not cover all drugs, with four plans not covering four of the 10 drugs selected.
- One plan does not cover five of the drugs selected

Arizona





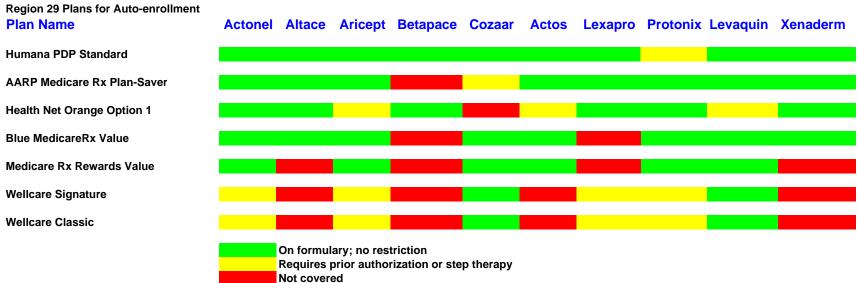
Region 29: Nevada

Number of Nursing Home Residents:	4,261
Number of Dual-eligible Residents	2,642 (62%)
Number of Nursing Homes	46
Number of PDPs below the Benchmark	7

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- One plan covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- Six plans do not cover all drugs, with three plans not covering four of the 10 drugs selected.



Nevada





Pharmacy Alliance

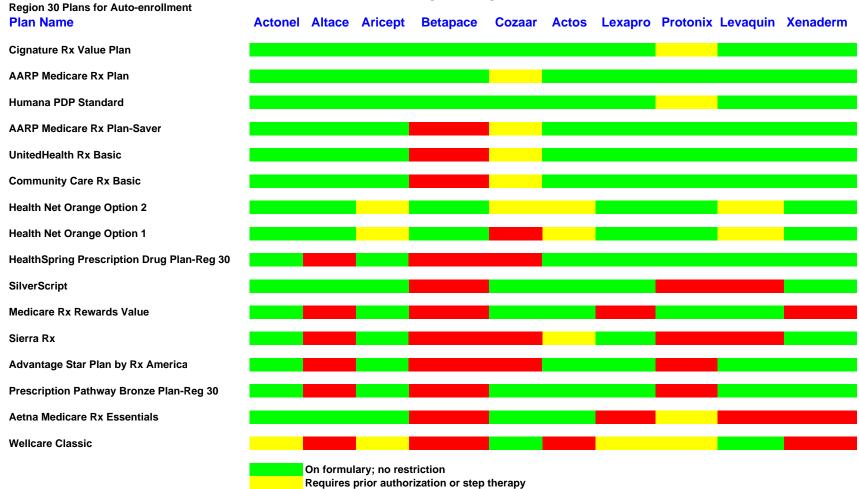
Region 30: Oregon and Washington

Number of Nursing Home Residents:	Oregon:	7,424
	<u>Washington</u>	<u>19,104</u>
	Total	26,528
Number of Dual-eligible Residents:	Oregon	4,529 (61%)
	Washington	11,844 (61%)
	Total	16,373
Number of Nursing Homes	Oregon	124
-	Washington	243
	Total	367
Number of PDPs below the Benchmark	C :	16

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel: Altace: Aricept:	Treatment for osteoporosis Treatment of congestive heart failure Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Three plans covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- 13 plans do not cover all drugs, with four plans not covering four of the 10 drugs selected
- One plan does not cover 5 of the 10 drugs selected



Oregon/Washington

Not covered





Long Term Care Pharmacy Alliance

Region 31: Utah and Idaho

Number of Nursing Home Residents	Utah <u>Idaho</u> Total	4,615 <u>4,183</u> 8,798
Number of Dual-eligible Residents:	Utah <u>Idaho</u> Total	2,538 (55%) 2,468 (59%) 5,006
Number of Nursing Homes	Utah <u>Idaho</u> Total	81 <u>71</u> 152
Number of PDPs below Benchmark		18

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Three plans covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- 15 plans do not cover all drugs, with five plans not covering four of the 10 drugs selected
- Two plans do not cover 5 of the 10 drugs selected



Utah/Idaho



Region 32: California

Number of Nursing Home Residents:	100,268
Number of Dual-eligible Residents	66,177 (66%)
Number of Nursing Homes	1,228
Number of PDPs below Benchmark	9

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Two plans covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- 7 plans do not cover all drugs, with five plans not covering four of the 10 drugs selected

Region 31 Plans for Auto-enrollment Actonel Altace Aricept Betapace Cozar Actos Lexapro Protonix Levaquin Xenaderm Cignature Rx Value Plan Image: Cozar Actos Lexapro Protonix Levaquin Xenaderm Humana PDP Standard Image: Cozar Actos Lexapro Protonix Levaquin Xenaderm AARP Medicare Rx Plan-Saver Image: Cozar Image: Cozar<

California



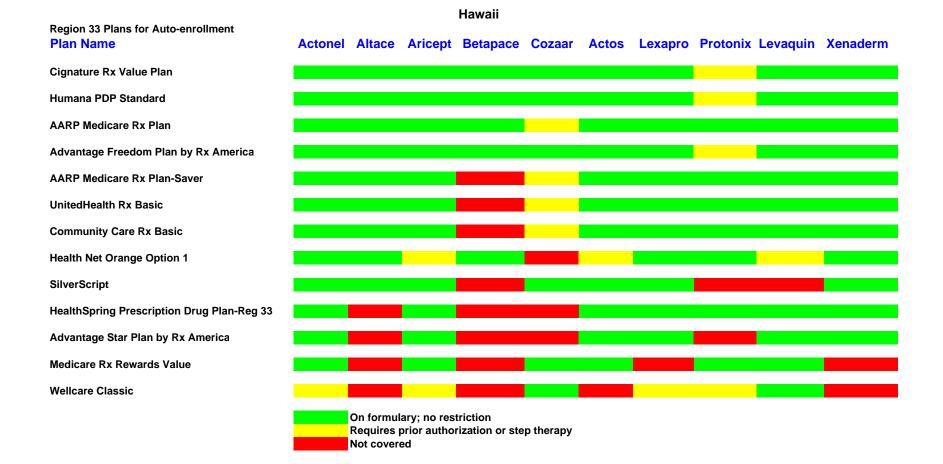
Region 33: Hawaii

Number of Nursing Home Residents	2,958
Number of Dual-eligible Residents	2,219 (75%)
Number of Nursing Homes	39
Number of PDPs below Benchmark:	13

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Four plans covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- 9 plans do not cover all drugs, with four plans not covering four of the 10 drugs selected





Region 34: Alaska

Number of Nursing Home Residents	627
Number of Dual-eligible Residents	520 (83%)
Number of Nursing Homes	15
Number of PDPs below Benchmark	15

The Attached chart shows a list of 10 commonly-used drugs in the long-term care setting:

Actonel:	Treatment for osteoporosis
Altace:	Treatment of congestive heart failure
Aricept:	Treatment of Alzheimer's disease
Betapace:	Treatment of abnormal heart rhythm
Cozaar:	Treatment of high blood pressure
Actos:	Treatment of non-insulin dependent diabetes
Lexapro:	Treatment of depression
Protonix:	Treatment of gastric reflux
Levaquin:	Treatment of certain types of infection
Xenaderm:	Treatment of wounds

- Three plans covers all drugs, but requires prior authorization (PA) or step therapy for one drug
- 12 plans do not cover all drugs, with five plans not covering four of the 10 drugs selected

