



Comparison of VA National Formulary and Formularies of the Highest Enrollment Plans in Medicare Part D and the Federal Employee Health Benefit Program

Prepared for:

PhRMA

Submitted by:

The Lewin Group, Inc.

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The Pharmaceutical Research and Manufacturers of America asked The Lewin Group to compare the formulary status of drugs commonly used by the Medicare population on the Veterans Affairs National Formulary (VA formulary), the two highest enrollment Medicare Part D plans, and the plan with highest enrollment in the Federal Employee Health Benefit Program (FEHBP). Lewin first completed this analysis in January 2007 using the 2007 versions of the VA formulary, Medicare Part D formularies, and FEHBP formulary. This report provides an update to the 2007 analysis. In addition, we analyzed the tier distribution of the drugs covered on the Part D formularies.

Lewin identified the drugs most commonly used by the Medicare population by querying Verispan's Vector One National Audit (VONA) data to compile the 300 drugs with the highest script volumes for the 65 and older population.¹ Nineteen of the top 300 drugs are not covered by the Part D program due to statutory or regulatory requirements.² We conducted the analysis using the remaining 281 Part D covered drugs.

Key Findings

Overall, coverage of the top Part D covered drugs by the VA formulary, FEHBP formulary, and the formularies of the two highest enrollment Medicare Part D plans remains largely unchanged since the 2007 analysis. The FEHBP and Medicare Part D formularies that we analyzed all provide a greater breadth of drug coverage than the VA formulary. Additionally, both of the Part D formularies placed close to 90 percent of the top 281 Part D covered drugs on either tier one or tier two.

Exhibit 1 illustrates the number and percent of scripts covered by the VA, FEHBP, and the two Medicare Part D formularies for all of the general drug categories that are captured by the top Part D covered drugs. Exhibit 2 illustrates the formulary status for each of the top 300 drugs.

- ⇒ Of the 281 Part D covered drugs, 183 (65%) are included in the VA formulary, compared to 273 (97%) in the FEHBP formulary, 278 (99%) in the highest enrollment Part D plan formulary, and 280 (100%) in the second highest enrollment Part D plan formulary. Of the 116 brand drugs among the 281 Part D covered drugs, 51 (44%) are covered by the VA formulary, compared to 115 (99%) covered by the FEHBP formulary, 114 (98%) covered by the highest enrollment Part D plan formulary, and 116 (100%) covered by the second highest enrollment Part D plan formulary.
- ⇒ The two highest enrollment Part D plans predominantly place the top 281 Part D covered drugs on tiers one or two. Of the 278 drugs covered by the highest enrollment Part D plan formulary, 242 (87%) are on tiers one or two. Of the 280 drugs covered by the second highest enrollment Part D plan formulary, 248 (89%) are on tiers one or two.

¹ The script volume for each drug is from the time period of January 2008 through July 2008.

² The following drugs excluded from Part D coverage: Alprazolam, Aspirin (enteric-coat), Benzonatate, Cheratussin AC, Cialis, Clonazepam, Cyanocobalamin, Diazepam, Docusate Sodium, Ferrous Sulfate, Folic Acid, Levitra, Lorazepam, Phenobarbital, Promethazine/Codeine, Temazepam, Tussionex, Viagra, Vitamin D. The list of Part D excluded drugs was obtained from: www.cms.hhs.gov/PrescriptionDrugCovContra/Downloads/R2PDB.pdf.

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- ⇒ Of the 569 million scripts analyzed, 72% of the total and 41% of the brand scripts are covered by the VA formulary. In contrast, 99% of all scripts and 100% of brand scripts are covered by the FEHBP plan. The highest enrollment Part D plan covers 99% of all scripts and 99% of brand scripts and the second highest enrollment Part D plan covers 100% of all scripts and 100% of brand scripts.
 - ⇒ VA formulary coverage varies widely among the drug categories due to the partially closed nature of the formulary; for example, while 76% of all scripts are covered in the largest category (cardiovascular), fewer than half of scripts for ear, nose, and throat and urologic disorders are covered.

Methodology

We downloaded the VA's National Drug File from the VA pharmacy website³ and checked each of the 281 Part D covered drugs against those covered by the VA formulary. Since the VA formulary is organized by generic entity and only includes the names of brand name drugs when they cannot be substituted due to narrow therapeutic index, all matches were based on the generic name of the drug. For example, if the brand name of a drug appears on the list of top drugs and that drug's generic name is listed on the VA formulary, the brand drug is counted as being on the VA formulary.

In some cases, the VA formulary covers only certain strengths or forms of a particular drug (e.g., IV version is covered but the tablets are not covered). In those cases, we looked at the breakdown of script volume by dosage and form for that drug within the VONA data in order to determine how many scripts are covered on the VA formulary and how many are excluded. For the purposes of Exhibit 1, we only counted scripts for a particular drug when those specific formulations (e.g., capsules, extended release version) were covered. In order to determine formulary coverage for Exhibit 2, we used the percent of the VONA scripts for that drug that were actually covered as a proxy for formulary coverage. If more than 90% of the script volume for a particular drug was covered by the VA formulary, the entire drug was considered as being covered on the VA formulary. If less than 5% of the script volume for a particular drug was covered by the VA formulary, the entire drug was labeled as being excluded from the VA formulary. If between 5% and 90% of the script volume for a particular drug was covered by the VA formulary, the drug was labeled as having "some forms" on the VA formulary. Using this methodology, only three drugs⁴ were labeled as excluded because the VA formulary covered less than 5% of each drug's script volume. Drugs meeting the "some forms" or "included" criterion were counted as being covered on the formulary.

The FEHBP national plan with highest enrollment is the Blue Cross Blue Shield FEP Basic plan. The FEP basic formulary was obtained from the BCBS Federal Employee Program website.⁵ Similar to the VA formulary, the FEP Basic formulary does not list all the brand name drugs covered, but instead is organized by generic entity. Therefore, we matched drugs on the FEP

³ <http://www.pbm.va.gov/NationalFormulary.aspx>

⁴ Protonix, famotidine, and labetalol

⁵ http://www.caremark.com/portal/asset/feprx_807.pdf

Basic formulary to each of the 281 Part D covered drugs based on the generic form of the drug. The FEP Basic formulary generally covers or excludes all forms of a drug, so if a drug was covered on the formulary, we counted all of the scripts for that drug as being covered.

According to CMS data, the two highest enrollment Medicare Part D plans based on October 2008 enrollment are the United AARP MedicareRx Preferred Plan and the Humana Standard Plan. The United AARP MedicareRx Preferred formulary and Humana Standard formulary were obtained from each plan's respective website.⁶ Unlike the VA and FEHBP formularies, the format of the Part D formularies allowed us to consider whether the brand form, generic form, or both are on formulary. Therefore, for example, we only counted the brand version as being covered if the specific brand name appeared on the Part D plan formulary. If only the generic name appeared on the plan's formulary, the brand version was not counted as being on the Part D plan formulary. Only one drug, Nitroquick, was excluded from the count of Part D covered drugs due to this different method of counting formulary coverage for the Part D plans. The United AARP MedicareRx Preferred Plan does not cover Nitroquick, however it does cover the generic form of the drug, nitroglycerin. Like the FEHBP formulary, the Medicare Part D formularies generally either cover or exclude all forms of a drug. If a drug was on the Part D formulary, we counted all of the scripts for that drug as being covered.

Beyond inclusion on the formulary, the tier assignment of a particular drug can impact its accessibility for the beneficiary. Both the United AARP MedicareRx Preferred plan and the Humana Standard plan use a four tier formulary structure. In multi-tier formularies, drugs placed on tiers one or two are considered preferred generic and brand drugs and have lower cost share requirements than drugs on higher tiers. United AARP MedicareRx Preferred members pay tiered copayments for drugs on the first three tiers and 33% coinsurance for drugs on the fourth tier. Humana PDP Standard members pay 25% coinsurance for drugs across all tiers. While the Humana PDP Standard has a single coinsurance structure, the four tier formulary structure is the same as those used for Humana's PDP Enhanced and Complete plans and reflects which drugs Humana considers preferred brand and generic drugs. We examined the tier placement of the 281 Part D covered drugs for both of the Part D formularies to see what percent of these top drugs were placed on a preferred tier.

⁶ United AARP formulary from https://www.aarpmedicarerx.com/online_documents/ovation/pdf/pdp/en/2009/FLPDP3023174_XAPE002.pdf and Humana Standard formulary from <http://apps.humana.com/marketing/documents.asp?file=906360>

Exhibit 1: Scripts Covered by the VA, FEHBP, and Two Medicare Part D Formularies, by General Drug Category¹

General Drug Category	Count of Drugs	Total Scripts (in 000s)	VA National Formulary		FEHBP with Highest Enrollment Formulary		Highest Enrollment Medicare Part D PDP		2nd Highest Enrollment Medicare Part D PDP	
			Scripts Covered (in 000s)	% Scripts Covered	Scripts Covered (in 000s)	% Scripts Covered	Scripts Covered (in 000s)	% Scripts Covered	Scripts Covered (in 000s)	% Scripts Covered
Cardiovascular Agents (High Blood Pressure, Heart Disease)	83	245,167	185,117	76%	243,431	99%	237,780	97%	245,167	100%
Gastrointestinal Drugs (Stomach and Intestine Disorders)	35	63,361	33,273	53%	63,361	100%	63,361	100%	63,361	100%
Antimicrobials and Infectious Diseases (Infection)	22	31,015	27,744	89%	31,015	100%	31,015	100%	31,015	100%
Pain and Inflammatory Diseases (Arthritis, Gout)	22	46,952	33,023	70%	46,284	99%	46,952	100%	46,952	100%
Psychiatric	20	34,042	23,072	68%	34,042	100%	34,042	100%	34,042	100%
Eye	15	11,635	6,284	54%	11,635	100%	11,635	100%	11,635	100%
Respiratory Drugs (Asthma, Emphysema)	15	21,166	14,967	71%	21,166	100%	21,166	100%	20,773	98%
Neurological Drugs (Migraine, Parkinson's Disease, Alzheimer's Disease)	14	19,106	15,473	81%	17,562	92%	19,106	100%	19,106	100%
Hormone Therapy/Menopause	11	19,411	13,894	72%	19,411	100%	19,411	100%	19,411	100%
Ear, Nose and Throat	10	7,977	3,471	44%	7,492	94%	7,977	100%	7,977	100%
Hormones (Thyroid, Growth Hormones)	9	28,323	27,705	98%	28,323	100%	27,707	98%	28,323	100%
Urologic Disorders	8	6,044	1,888	31%	6,044	100%	5,647	93%	6,044	100%
Anticoagulants and Hematopoietics (Blood Modifiers)	7	21,861	20,753	95%	21,861	100%	21,861	100%	21,861	100%
Benign Prostatic Hyperplasia	4	8,817	3,788	43%	8,817	100%	8,817	100%	8,817	100%
Skin (Acne, Skin Infection, Psoriasis)	2	1,845	0	0%	1,845	100%	1,845	100%	1,845	100%
Women's Health	2	1,282	1,282	100%	1,282	100%	1,282	100%	1,282	100%
Antineoplastics and Immunosuppressants	1	601	0	0%	601	100%	601	100%	601	100%
Supplements	1	483	482	100%	483	100%	483	100%	483	100%
Total - Part D Covered Drugs	281	569,088	412,217	72%	564,653	99%	560,687	99%	568,695	100%
Total - Brand Drugs	116	183,136	75,143	41%	182,792	100%	181,436	99%	183,136	100%

¹ Scripts associated with the following Part D excluded drugs are not included in this exhibit: Alprazolam, Aspirin (enteric-coat), Benzonatate, Cheratussin AC, Cialis, Clonazepam, Cyanocobalamin, Diazepam, Docusate Sodium, Ferrous Sulfate, Folic Acid, Levitra, Lorazepam, Phenobarbital, Promethazine/Codeine, Temazepam, Tussionex, Viagra, Vitamin D. The list of Part D excluded drugs was obtained from:
<http://www.cms.hhs.gov/PrescriptionDrugCovContra/Downloads/R2PDB.pdf>.

Exhibit 2: Top 300 Drugs for the 65+ Population by Script Volume, January – July 2008¹
 (highlighted drugs are statutory exclusions from Part D coverage)

65+ Script Ranking	Drug Name	Generic/Active Ingredient	Brand/ Generic	Scripts For 65+ (in 000s)	Estimated Sales Ranking (65+) ²	Sales Ranking (all U.S.)	VA National Formulary Status ³	FEHBP with Highest Enrollment Formulary Status	Highest Enrollment Medicare PDP Formulary Tier Status	2nd Highest Enrollment Medicare PDP Formulary Tier Status
1	Lisinopril	lisinopril	G	17,591	49	67	Y	Y	1/2	1/2
2	Simvastatin	simvastatin	G	15,687	13	25	Y	Y	1/2	1/2
3	Eurosemide Oral	eurosemide	G	14,456	109	207	Y	Y	1/2	1/2
4	Lipitor	atorvastatin	B	13,908	1	1	N	Y	1/2	1/2
5	Hydrocodone/APAP	hydrocodone/acetaminophen	G	13,770	42	17	Y	Y	1/2	1/2
6	Levothyroxine	levothyroxine	G	13,534	59	89	Y	Y	1/2	1/2
7	Amlodipine Besylate	amlodipine besylate	G	12,368	26	58	Y	Y	1/2	1/2
8	Hydrochlorothiazide	hydrochlorothiazide	G	11,962	119	157	Y	Y	1/2	1/2
9	Atenolol	atenolol	G	11,405	114	162	Y	Y	1/2	1/2
10	Metoprolol Succinate	metoprolol succinate	G	11,405	16	34	Y	Y	1/2	1/2
11	Metoprolol Tartrate	metoprolol tartrate	G	9,856	128	210	Y	Y	1/2	1/2
12	Plavix	clopidogrel	B	9,358	2	3	Y	Y	1/2	1/2
13	Warfarin	warfarin	G	8,775	60	147	Y	Y	1/2	1/2
14	Metformin	metformin	G	7,649	77	105	Y	Y	1/2	1/2
15	Omeprazole	omeprazole	G	7,524	25	39	Y	Y	1/2	1/2
16	Alprazolam ⁴	alprazolam	G	5,682	139	104	Y	Y	N	N
17	Nexium	esomeprazole	B	5,626	3	2	N	Y	1/2	1/2
18	Triamterene w/HCTZ	triامترنے/hydrochlorothiazide	G	5,369	184	267	Y	Y	1/2	1/2
19	Klor-Con	potassium chloride	B	5,052	140	260	Y	Y	1/2	1/2
20	Diovan	valsartan	B	4,881	12	29	Y	Y	1/2	1/2
21	Prednisone Oral	prednisone	G	4,786	183	208	Y	Y	1/2	1/2
22	Synthroid	levothyroxine	B	4,763	80	93	Y	Y	1/2	1/2
23	Propoxyphene-N/APAP	propoxyphene/acetaminophen	G	4,722	151	197	N	Y	1/2	1/2
24	Lovastatin	lovastatin	G	4,678	65	122	Y	Y	1/2	1/2
25	Potassium Chloride	potassium chloride	G	4,632	135	254	Y	Y	1/2	1/2
26	Azithromycin	azithromycin	G	4,612	61	27	Y	Y	1/2	1/2
27	Lorazepam ⁴	lorazepam	G	4,611	120	139	Y	Y	N	N
28	Alendronate	alendronate	G	4,569	41	94	Y	Y	1/2	1/2
29	Flomax	tamsulosin	B	4,550	8	33	N	Y	1/2	1/2
30	Gabapentin	gabapentin	G	4,485	48	54	Y	Y	1/2	1/2
31	Zolpidem Tartrate	zolpidem tartrate	G	4,458	63	64	N	Y	1/2	1/2
32	Carvedilol	carvedilol	G	4,326	84	158	Y	Y	1/2	1/2
33	Isosorbide Mononitrate	isosorbide mononitrate	G	4,048	173	378	Y	Y	1/2	1/2
34	Lisinopril/HCTZ	lisinopril/hydrochlorothiazide	G	3,974	165	191	Y	Y	1/2	1/2
35	Ciprofloxacin HCl	ciprofloxacin hydrochloride	G	3,952	194	217	Y	Y	1/2	1/2
36	Amoxicillin	amoxicillin	G	3,939	217	106	Y	Y	1/2	1/2
37	Sertraline	sertraline	G	3,884	99	74	Y	Y	1/2	1/2
38	Vytorin	ezetimibe	B	3,855	9	19	N	Y	1/2	1/2
39	Enalapril	enalapril	G	3,679	169	264	Y	Y	1/2	1/2
40	Allropurinol	allopurinol	G	3,650	260	422	Y	Y	1/2	1/2
41	Pravastatin	pravastatin	G	3,596	92	140	N	Y	1/2	1/2
42	Advair Diskus	fluticasone/salmeterol	B	3,543	4	4	N	Y	1/2	1/2
43	Tramadol	tramadol	G	3,489	157	152	Y	Y	1/2	1/2
44	Prevacid	lansoprazole	B	3,459	7	5	N	Y	1/2	1/2
45	Zetia	ezetimibe	B	3,445	15	30	N	Y	1/2	1/2
46	Crestor	rosuvastatin	B	3,424	14	21	N	Y	3/4	1/2
47	Actos	pioglitazone	B	3,402	5	9	N	Y	1/2	1/2
48	Lexapro	escitalopram	B	3,375	21	10	N	Y	1/2	1/2
49	Aricept	donepezil	B	3,345	6	35	Y	Y	1/2	1/2
50	Diovan HCT	hydrochlorothiazide/valsartan	B	3,295	23	32	N	Y	1/2	1/2
51	Actonet	risedronate	B	3,084	24	62	Y	Y	1/2	1/2
52	Amlodipine Besylate/Benazepril	amlodipine besylate/benazepril	G	3,060	27	43	N	Y	1/2	1/2
53	Metformin HCl ER	metformin	G	2,972	180	218	Y	Y	1/2	1/2
54	Levaquin	levofloxacin	B	2,872	19	23	N	Y	1/2	1/2
55	Cephalexin	cephalexin	G	2,854	215	170	Y	Y	1/2	1/2
56	Celebrex	celecoxib	B	2,832	11	22	N	Y	3/4	1/2
57	Xalatan	latanoprost	B	2,753	45	111	N	Y	3/4	1/2
58	Cozaar	losartan	B	2,733	36	68	Y	Y	3/4	3/4
59	Singulair	montelukast	B	2,717	22	6	Y	Y	1/2	1/2
60	Citalopram HBR	citalopram	G	2,712	216	176	Y	Y	1/2	1/2
61	Glyburide	glyburide	G	2,642	187	323	Y	Y	1/2	1/2
62	Ranitidine HCl	ranitidine hydrochloride	G	2,574	195	236	Y	Y	1/2	1/2
63	Spiriva	tiotropium	B	2,567	10	36	Y	Y	1/2	1/2
64	Oxycodone w/APAP	oxycodone/acetaminophen	G	2,563	130	73	some forms	Y	1/2	1/2
65	Digoxin	digoxin	G	2,529	315	610	Y	Y	1/2	1/2
66	Meloxicam	meloxicam	G	2,515	200	253	N	Y	1/2	1/2
67	Clonidine	clonidine	G	2,501	275	377	Y	Y	1/2	1/2
68	Glimepiride	glimepiride	G	2,500	229	368	N	Y	1/2	1/2
69	Paroxetine	paroxetine	G	2,457	141	126	Y	Y	1/2	1/2
70	Verapamil SR	verapamil	G	2,447	145	231	Y	Y	1/2	1/2
71	Spirotonactone	spirotolactone	G	2,379	185	285	Y	Y	1/2	1/2
72	Amitriptyline	amitriptyline	G	2,351	377	437	Y	Y	1/2	1/2
73	Lantus	insulin glargine	B	2,343	18	24	N	Y	1/2	1/2
74	Fexofenadine	fexofenadine	G	2,261	75	55	N	Y	1/2	1/2
75	Folic Acid ⁴	folic acid	G	2,246	347	492	Y	Y	N	N
76	Clonazepam ⁴	clonazepam	G	2,200	239	160	Y	Y	N	N
77	Tricor	fenofibrate	B	2,172	30	31	N	Y	1/2	1/2
78	Fluoxetine	fluoxetine	G	2,157	221	134	Y	Y	1/2	1/2

65+ Script Ranking	Drug Name	Generic/Active Ingredient	Brand/ Generic	Scripts For 65+ (in 000s)	Estimated Sales Ranking (65+) ²	Sales Ranking (all U.S.)	VA National Formulary Status ³	FEHBP with Highest Enrollment Formulary Status	Highest Enrollment Medicare PDP Formulary Tier Status	2nd Highest Enrollment Medicare PDP Formulary Tier Status
79	Albuterol Aerosol	albuterol	G	2,155	156	120	Y	Y	1/2	1/2
80	Doxazosin	doxazosin	G	2,133	285	520	Y	Y	1/2	1/2
81	Glipizide	glipizide	G	2,123	330	511	Y	Y	1/2	1/2
82	Trazodone HCl	trazodone hydrochloride	G	2,122	324	296	Y	Y	1/2	1/2
83	Pantoprazole	pantoprazole	G	2,101	33	40	N	Y	1/2	1/2
84	Premarin Tabs	estrogens, conjugated	B	2,081	72	85	Y	Y	1/2	1/2
85	Temazepam ⁴	temazepam	G	2,041	296	432	Y	Y	N	N
86	Namenda	memantine	B	2,038	20	83	Y	Y	1/2	1/2
87	Fluticasone Nasal	fluticasone	G	1,950	123	81	N	Y	1/2	1/2
88	Benazepril	benazepril	G	1,921	279	419	Y	Y	1/2	1/2
89	Detroit LA	tolterodine	B	1,921	29	66	N	Y	1/2	1/2
90	Diazepam ⁴	diazepam	G	1,838	346	333	Y	Y	N	N
91	Ibuprofen	ibuprofen	G	1,803	401	243	Y	Y	1/2	1/2
92	Cyclobenzaprine	cyclobenzaprine	G	1,786	312	203	Y	Y	3/4	1/2
93	Lyrica	pregabalin	B	1,786	28	28	N	Y	1/2	3/4
94	Medclizine HCl	medclizine	G	1,745	379	609	Y	Y	1/2	1/2
95	Acetaminophen w/Cod	acetaminophen/codiene	G	1,742	322	290	Y	Y	1/2	1/2
96	Digitek	digoxin	B	1,723	423	748	Y	Y	1/2	1/2
97	Evista	raloxifene	B	1,722	44	96	N	Y	1/2	1/2
98	Glipizide ER	glipizide	G	1,721	205	349	N	Y	1/2	1/2
99	Benicar	olmesartan	B	1,712	68	113	N	Y	1/2	1/2
100	Naproxen	naproxen	G	1,696	343	321	Y	Y	1/2	1/2
101	Levoxydine	levothyroxine	B	1,688	257	328	Y	Y	1/2	1/2
102	Potassium Chloride E	potassium chloride	G	1,672	271	462	Y	Y	1/2	1/2
103	Cartia XT	diltiazem	B	1,672	125	216	N	Y	1/2	1/2
104	Terazosin	terazosin	G	1,655	264	494	Y	Y	1/2	1/2
105	Hyzaar	hydrochlorothiazide/losartan	B	1,648	56	92	N	Y	3/4	3/4
106	Fosamax	alendronate	B	1,644	53	125	Y	Y	1/2	1/2
107	Avapro	irbesartan	B	1,639	62	119	N	Y	3/4	1/2
108	Quinapril	quinapril	G	1,618	189	293	N	Y	1/2	1/2
109	Diltiazem CD	diltiazem	G	1,598	133	249	some forms	Y	1/2	1/2
110	Ramipril	ramipril	G	1,596	91	127	N	Y	1/2	1/2
111	Nifedipine ER	nifedipine	G	1,572	106	180	Y	Y	1/2	1/2
112	Trimethoprim/Sulfa	trimethoprim/sulfamethoxazole	G	1,550	367	324	Y	Y	1/2	1/2
113	Boniva	ibandronate	B	1,550	52	95	N	Y	3/4	3/4
114	Combivent	albuterol/pratropium	B	1,535	50	86	Y	Y	1/2	1/2
115	Finasteride	finasteride	G	1,526	82	181	Y	Y	1/2	1/2
116	Methylprednis Tabs	methylprednisolone	G	1,505	426	395	Y	Y	1/2	1/2
117	Doxycycline	doxycycline	G	1,488	376	339	Y	Y	1/2	1/2
118	Effexor XR	venlafaxine	B	1,465	34	8	Y	Y	1/2	1/2
119	Cymbalta	duloxetine	B	1,451	38	13	N	Y	1/2	1/2
120	Lanoxin	digoxin	B	1,422	358	676	Y	Y	1/2	3/4
121	Coumadin Tabs	warfarin	B	1,408	137	278	Y	Y	1/2	3/4
122	Amoxicillin/Pot Clav	amoxicillin/potassium clavulanate	G	1,407	142	51	Y	Y	1/2	1/2
123	Mirtazapine	mirtazapine	G	1,387	222	317	Y	Y	1/2	1/2
124	ProAir HFA	albuterol	B	1,366	154	109	Y	Y	1/2	1/2
125	Metoclopramide	metoclopramide	G	1,366	395	493	Y	Y	1/2	1/2
126	Triamcinol Acet Top	triamcinolone acetonide	G	1,345	414	458	Y	Y	1/2	1/2
127	Avodart	dutasteride	B	1,322	55	135	N	Y	1/2	1/2
128	Seroquel	quetiapine	B	1,321	17	7	Y	Y	1/2	1/2
129	Gemfibrozil	gemfibrozil	G	1,316	255	350	Y	Y	1/2	1/2
130	Viagra ⁴	sildenafil	B	1,312	66	47	N	N	N	N
131	Benicar HCT	hydrochlorothiazide/olmesartan	B	1,290	83	100	N	Y	1/2	1/2
132	Vitamin D ⁴	vitamin D	G	1,282	349	498	N	N	N	N
133	Nitroglycerin	nitroglycerin	G	1,266	259	514	some forms	Y	1/2	1/2
134	Felodipine ER	felodipine	G	1,251	127	229	Y	Y	1/2	1/2
135	Glybrid/Metfrmin HCl	glyburide/metformin	G	1,201	188	269	N	Y	1/2	1/2
136	Protonix	pantoprazole	B	1,195	51	80	N	Y	1/2	3/4
137	Carbidopa/Levodopa	carbidopa/levodopa	G	1,186	163	367	Y	Y	1/2	1/2
138	Januvia	sitagliptin	B	1,180	37	52	N	Y	3/4	3/4
139	Amiodarone	amiodarone	G	1,155	210	444	Y	Y	1/2	1/2
140	Propranolol HCl	propranolol	G	1,153	319	398	Y	Y	1/2	1/2
141	Nasonex	mometasone	B	1,139	90	46	N	Y	1/2	1/2
142	Fentanyl Transdermal	fentanyl	G	1,112	35	42	Y	Y	1/2	1/2
143	Nitroquick	nitroglycerin	B	1,083	529	875	Y	Y	N	1/2
144	Niaspan	niacin	B	1,082	57	77	Y	Y	1/2	1/2
145	Aciphex	rabeprazole	B	1,075	46	38	N	Y	3/4	3/4
146	Lumigan	bimatoprost	B	1,074	79	188	N	Y	1/2	1/2
147	Polyethylene Glycol	polyethylene glycol	G	1,072	240	357	N	Y	1/2	1/2
148	Alphagan P	brimonidine	B	1,040	104	223	Y	Y	1/2	1/2
149	Toprol XL	metoprolol succinate	B	1,030	164	271	Y	Y	3/4	3/4
150	Avade	hydrochlorothiazide/irbesartan	B	1,019	98	133	N	Y	3/4	1/2
151	Aspirin,Enteric-Coat ⁴	aspirin	G	1,015	742	1106	Y	N	N	1/2
152	Albuterol Neb Soln	albuterol	G	1,012	269	226	Y	Y	1/2	1/2
153	Promethazine Tabs	promethazine	G	1,010	396	310	Y	Y	3/4	1/2
154	Methotrexate	methotrexate	G	1,001	292	389	Y	Y	1/2	1/2
155	Diclofenac Sodium SR	diclofenac sodium	G	991	310	348	Y	Y	1/2	1/2
156	Lidoderm	lidocaine	B	975	32	44	N	Y	1/2	1/2
157	Hydralazine	hydralazine	G	970	247	460	Y	Y	1/2	1/2
158	Famotidine	famotidine	G	969	410	567	N	Y	1/2	1/2
159	Hydroxyzine	hydroxyzine	G	966	273	282	Y	Y	3/4	1/2
160	Altace	ramipril	B	958	118	168	N	Y	1/2	1/2

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161	Fluconazole	fluconazole	G	957	455	318	Y	Y	1/2	1/2
162	Cosopt	dorzolamide/timolol	B	946	71	183	Y	Y	1/2	1/2
163	Colchicine	colchicine	G	943	490	736	Y	Y	1/2	1/2
164	Fosamax Plus D	alendronate/cholecalciferol	B	924	103	186	N	Y	1/2	1/2
165	Ambien CR	zolpidem	B	908	78	50	N	Y	1/2	3/4
166	Clindamycin Systemic	clindamycin	G	897	274	237	Y	Y	1/2	1/2
167	Ferrous Sulfate ⁴	ferrous sulfate	G	893	638	853	Y	N	N	N
168	Avandia	rosiglitazone	B	886	54	88	Y	Y	1/2	1/2
169	Bisoprolol/HCTZ	bisoprolol/hydrochlorothiazide	G	881	434	540	N	Y	1/2	1/2
170	Clotrimazol/Betamethsn	clotrimazole/betamethasone	G	870	305	379	N	Y	1/2	1/2
171	Glipizide XL	glipizide	G	844	320	500	N	Y	1/2	1/2
172	Nitrofrntin Mnhy Mcr	nitrofurantoin	G	835	352	406	Y	Y	3/4	1/2
173	Oxybutynin Chloride	oxybutynin chloride	G	825	494	770	Y	Y	1/2	1/2
174	Diltiazem SR	diltiazem	G	798	301	531	Y	Y	1/2	1/2
175	Lotrel	amlodipine/benazepril	B	790	94	123	N	Y	1/2	1/2
176	Sotalol	sotalol	G	782	278	530	Y	Y	1/2	1/2
177	Carisoprodol	carisoprodol	G	772	393	209	N	N	1/2	1/2
178	Risperdal	risperidone	B	769	43	16	Y	Y	1/2	1/2
179	Lunesta	eszopiclone	B	763	85	60	N	Y	1/2	3/4
180	Nabumetone	nabumetone	G	757	231	257	N	Y	1/2	1/2
181	Sulfamethoxazole/Tri	sulfamethoxazole/trimethoprim	G	751	566	564	Y	Y	1/2	1/2
182	Atenolol Chlorthal	atenolol/chlorthalidone	G	749	541	724	Y	Y	1/2	1/2
183	Vigamox	moxifloxacin	B	737	168	190	Y	Y	1/2	3/4
184	Vesicare	solifenacain	B	736	93	165	N	Y	3/4	1/2
185	Agrenox	aspirin/dipyridamole	B	734	73	184	Y	Y	1/2	1/2
186	Fosinopril Sodium	fosinopril	G	731	340	536	Y	Y	1/2	1/2
187	Caduet	amlodipine/atorvastatin	B	724	74	121	N	Y	3/4	3/4
188	Benzonatate ⁴	benzonatate	G	724	355	384	N	Y	N	N
189	Avelox	moxifloxacin	B	721	117	103	Y	Y	1/2	3/4
190	Requip	ropinirole	B	712	107	143	N	Y	1/2	1/2
191	Nitrofurantoin Mcroc	nitrofurantoin	G	711	308	455	Y	Y	3/4	1/2
192	Torsemide	torsemide	G	710	303	542	N	Y	1/2	1/2
193	Labetalol	labetalol	G	705	333	483	N	N	1/2	1/2
194	Metronidazole Tabs	metronidazole	G	705	592	555	Y	Y	1/2	1/2
195	Phenytoin Sodium Ext	phenytoin	G	702	286	355	Y	Y	1/2	1/2
196	Mirapex	pramipexole	B	688	97	148	Y	Y	1/2	1/2
197	Promethazine/Codeine ⁴	promethazine/codeine	G	680	503	468	N	Y	N	N
198	Bumetanide Non-Inj	bumetanide	G	674	453	785	Y	Y	1/2	1/2
199	Tramadol HCl/APAP	tramadol hydrochloride/acetaminophen	G	668	243	298	N	N	1/2	1/2
200	Atacand	candesartan	B	665	158	262	N	Y	3/4	3/4
201	Timolol Maleate Oph	timolol	G	654	555	972	Y	Y	1/2	1/2
202	Clobetasol	clobetasol	G	647	288	346	Y	Y	1/2	1/2
203	Levothyroid	levothyroxine	B	645	559	830	Y	Y	1/2	1/2
204	Micardis	telmisartan	B	642	179	263	N	Y	3/4	3/4
205	Cilostazol	cilostazol	G	642	262	509	N	Y	1/2	1/2
206	Oxycodone	oxycodone	G	627	201	115	some forms	Y	1/2	1/2
207	Metolazone	metolazone	G	625	335	589	Y	Y	1/2	1/2
208	Estradiol Oral	estradiol	G	622	610	566	Y	Y	1/2	1/2
209	Thyroid, Armour	thyroid	B	617	496	572	N	Y	N	1/2
210	Travatan	travoprost	B	611	148	329	Y	Y	1/2	1/2
211	Cheratussin AC ⁴	guaiifenesin	B	610	624	644	Y	N	N	N
212	Oxybutynin Chl ER	oxybutynin chloride	G	610	147	252	N	Y	1/2	1/2
213	Coreg CR	carvedilol	B	608	115	169	N	Y	3/4	3/4
214	Buspirone HCl	buspirone	G	608	364	338	Y	Y	1/2	1/2
215	Arimidex	anastrozole	B	601	47	82	N	Y	1/2	1/2
216	Captopril	captopril	G	595	635	1030	Y	N	1/2	1/2
217	Zymar	gatifloxacin	B	591	202	371	N	Y	1/2	3/4
218	Dicyclomine HCl	dicyclomine	G	591	584	713	Y	Y	3/4	1/2
219	Cialis ⁴	tadalafil	B	572	146	91	N	N	N	N
220	Humulin 70/30	insulin human	B	570	162	274	Y	Y	1/2	1/2
221	Humulin N	insulin human	B	559	190	272	Y	Y	1/2	1/2
222	Timolol Maleate GFS	timolol	G	558	354	661	Y	Y	1/2	1/2
223	Fluocinolide	fluocinolide	G	551	484	623	Y	Y	1/2	1/2
224	Hydroxychloroquine	hydroxychloroquine	G	551	406	456	Y	Y	1/2	1/2
225	Zyprexa	olanzapine	B	545	31	18	Y	Y	1/2	1/2
226	Penicillin VK	penicillin	G	542	601	441	Y	Y	1/2	1/2
227	Lovaza	omega 3 acid	B	542	124	129	N	Y	3/4	3/4
228	Flovent HFA	fluticasone	B	539	131	87	N	Y	1/2	1/2
229	Humalog	insulin lispro	B	535	88	69	N	Y	1/2	1/2
230	Indapamide	indapamide	G	534	686	1074	Y	Y	1/2	1/2
231	Mupirocin	mupirocin	G	532	387	365	Y	Y	1/2	1/2
232	Cyanocobalamin ⁴	cyanocobalamin	G	529	632	924	Y	Y	N	N
233	Nifedipine XL	nifedipine	G	529	266	435	Y	Y	1/2	1/2
234	Restasis	cyclosporine	B	514	105	141	N	Y	1/2	3/4
235	NovoLog	insulin aspart	B	509	89	72	Y	Y	1/2	1/2
236	Nifedipine	nifedipine	G	507	252	415	Y	Y	3/4	1/2
237	Prednisolne Acet Oph	prednisolone/sulfacetamide	G	500	526	791	Y	Y	1/2	1/2
238	Micardis HCT	telmisartan	B	496	196	248	N	Y	3/4	3/4
239	Nortriptyline	nortriptyline	G	491	620	712	Y	Y	1/2	1/2
240	OxyContin	oxycodone	B	490	39	12	N	Y	3/4	1/2
241	Enablex	darifenacin	B	490	138	250	N	Y	1/2	3/4
242	Chlorhexidine Glucon	chlorhexidine gluconate	G	485	666	702	Y	N	1/2	1/2

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243	Calcitriol	calcitriol	G	483	276	467	Y	Y	1/2	1/2
244	Travatan Z	travoprost	B	483	171	364	Y	Y	1/2	1/2
245	Proventil HFA	albuterol	B	481	295	230	Y	Y	1/2	1/2
246	Benazepril/HCTZ	benazepril/hydrochlorothiazide	G	480	514	684	N	Y	1/2	1/2
247	Uroxatral	alfuzosin	B	479	172	300	N	Y	3/4	3/4
248	Jantoven	warfarin	B	478	497	880	Y	Y	1/2	1/2
249	Phenazopyridine HCI	phenazopyridine	G	475	754	815	Y	Y	1/2	1/2
250	Isosorbide Dinitrate	isosorbide dinitrate	G	471	705	1209	Y	Y	1/2	1/2
251	Norvasc	amlodipine	B	469	186	341	Y	Y	3/4	3/4
252	Docusate Sodium ⁴	docusate	G	468	834	1166	Y	N	N	N
253	Pentoxyfylline	pentoxyfylline	G	466	461	818	N	Y	1/2	1/2
254	Tussionex ⁴	hydrocodone/chlorpheniramine	B	466	234	171	N	N	N	N
255	Valtrex	valacyclovir	B	466	100	20	Y	Y	1/2	1/2
256	Nystatin Systemic	nystatin	G	465	363	410	Y	Y	1/2	1/2
257	Acyclovir	acyclovir	G	448	510	418	Y	Y	1/2	1/2
258	Doxepin	doxepin	G	445	669	873	Y	Y	1/2	1/2
259	Sular	nisoldipine	B	444	206	366	N	Y	1/2	1/2
260	Etodolac	etodolac	G	437	405	425	some forms	Y	1/2	1/2
261	Nadolol	nadolol	G	437	516	706	N	N	1/2	1/2
262	Prednisone Intensol	prednisone	G	436	775	865	Y	Y	1/2	1/2
263	Theophylline SR	theophylline	G	430	504	789	Y	Y	1/2	1/2
264	Methocarbamol	methocarbamol	G	428	564	549	Y	N	3/4	1/2
265	Indometacin	indomethacin	G	425	554	646	Y	Y	1/2	1/2
266	Ketoconazole Topical	ketoconazole	G	424	438	447	Y	Y	1/2	1/2
267	Primidone	primidone	G	422	373	617	Y	Y	1/2	1/2
268	Astelin	azelastine	B	418	211	182	N	Y	1/2	1/2
269	Patanol	olopatadine	B	418	208	187	N	Y	1/2	1/2
270	Keppra	levetiracetam	B	412	64	45	Y	Y	1/2	1/2
271	Tobradex	dexamethasone/tobramycin	B	408	224	245	Y	Y	1/2	3/4
272	Cefuroxime Axetil	cefoxime axetil	G	405	416	404	Y	Y	1/2	1/2
273	Diphenoxylate w/Astro	diphenoxylate/atropine	G	404	650	878	Y	Y	3/4	1/2
274	Prochlorperazine Mal	prochlorperazine	G	399	612	773	Y	Y	1/2	1/2
275	Hyoscymine	hyoscymine	G	396	589	663	N	Y	N	1/2
276	Albuterol Sulf/Iprat	albuterol/ipratropium	G	393	161	295	Y	Y	1/2	N
277	NovoLog Mix 70/30	insulin human	B	389	102	142	Y	Y	1/2	1/2
278	Ipratropium Br Neb S	ipratropium	G	388	362	590	Y	Y	1/2	1/2
279	Diltiazem	diltiazem	G	387	543	866	Y	Y	1/2	1/2
280	Premarin Vaginal	estrogens, conjugated	B	386	207	284	Y	Y	1/2	1/2
281	Catapres-TTS	clonidine	B	385	134	214	Y	Y	1/2	3/4
282	Byetta	exenatide	B	383	101	79	N	Y	1/2	1/2
283	Diltiazem ER	diltiazem	G	382	314	526	Y	Y	1/2	1/2
284	Novolin 70/30	insulin human	B	381	225	375	Y	Y	1/2	1/2
285	Levitra ⁴	vardenafil	B	378	228	192	Y	N	N	N
286	Chantix	varenicline	B	375	181	65	Y	Y	3/4	3/4
287	Nasacort AQ	triamcinolone acetonide	B	369	223	154	N	Y	3/4	3/4
288	Fortical	calcitonin	B	368	246	502	Y	Y	1/2	1/2
289	Sucralfate	sucralfate	G	365	439	616	Y	Y	1/2	1/2
290	Oxycodeone HCL ER	oxycodone	G	364	87	61	N	Y	1/2	1/2
291	Lactulose	lactulose	G	361	520	760	Y	Y	1/2	1/2
292	Clarithromycin	clarithromycin	G	360	431	352	Y	Y	1/2	1/2
293	Acular LS	ketorolac tromethamine	B	355	241	470	N	Y	1/2	3/4
294	Lescol XL	fluvastatin	B	355	192	356	Y	Y	3/4	1/2
295	Dexamethasone Oral	dexamethasone	G	349	683	805	Y	Y	1/2	1/2
296	Erythromycin Ophth	erythromycin	G	348	849	1006	Y	Y	1/2	1/2
297	Phenobarbital ⁴	phenobarbital	G	345	732	746	Y	Y	N	N
298	Skelaxin	metaxalone	B	344	150	99	N	N	3/4	3/4
299	Clarinex	desloratadine	B	342	197	178	N	Y	3/4	3/4
300	Prandin	repaglinide	B	336	152	292	N	Y	3/4	1/2

¹ Number of scripts and sales volume data were obtained from the Verispan Vector One National (VONA) database. VA formulary information was obtained from <http://www.pbm.va.gov/NationalFormulary.aspx>. The FEHBP with the highest enrollment is the BCBS Federal Employees Program Basic plan. The BCBS FEP Basic formulary was obtained from http://www.caremark.com/portal/asset/feprx_807.pdf. According to CMS data, the highest enrollment Medicare PDP is United AARP MedicareRx Preferred and the second highest enrollment Medicare PDP is Humana Standard. The United AARP formulary was obtained from https://www.aarpmedicarx.com/online_documents/ovation/pdf/pdp/en/2009/FLPDP3023174_XAPE002.pdf and the Humana formulary was obtained from <http://apps.humana.com/marketing/documents.asp?file=906360>.

² Estimated sales for the 65+ population was based on the average price per prescription for the entire US population multiplied by the number of prescriptions for the 65+ population for that particular drug.

³ If more than 90% of the script volume for a particular drug was covered by the VA formulary, the entire drug is labeled as being on the VA formulary. If less than 5% of the script volume for a particular drug was covered by the VA formulary, the entire drug is labeled as being excluded from the VA formulary. If between 5% and 90% of the

script volume for a particular drug was covered by the VA formulary, the drug is labeled as having “some forms” on the VA formulary.

⁴ The highlighted drugs are not covered by Part D and were excluded from the analysis: Alprazolam, Aspirin (enteric-coat), Benzonatate, Cheratussin AC, Cialis, Clonazepam, Cyanocobalamin, Diazepam, Docusate Sodium, Ferrous Sulfate, Folic Acid, Levitra, Lorazepam, Phenobarbital, Promethazine/Codeine, Temazepam, Tussionex, Viagra, Vitamin D. The list of Part D excluded drugs was obtained from: www.cms.hhs.gov/PrescriptionDrugCovContra/Downloads/R2PDB.pdf.