

Department of Health and Human Services  
**Office of Inspector General**



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**DATA SNAPSHOT**

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June 2025 | OEI-05-25-00120

**Part D Plans Generally Include  
Drugs Commonly Used by Dual-  
Eligible Enrollees: 2025**



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## Part D Plans Generally Include Drugs Commonly Used by Dual-Eligible Enrollees: 2025

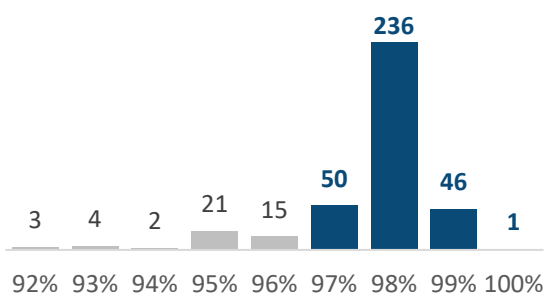
### Why OIG Did This Review

- For dual-eligible enrollees—that is, people enrolled in both Medicare and Medicaid—access to prescription drugs is particularly important. Overall, they have very low incomes and—because they are more likely to be in poorer health than other people enrolled in Medicare—tend to use more Medicare services.<sup>1</sup>
- Because Medicare prescription drug coverage is an important tool for ensuring access to prescription drugs, Congress mandated that OIG study whether Part D formularies cover prescription drugs commonly used by dual-eligibles enrollees.<sup>2</sup>
- For this report, we determined whether the 378 unique formularies used by the 5,178 Part D plans operating in 2025 cover 194 of the 200 drugs most commonly used by dual-eligible enrollees. See the methodology for more information about how we determined the most commonly used drugs.

### What OIG Found

- A majority of 2025 Part D plan formularies covered almost all commonly used drugs, and only a small number of commonly used drugs were not covered by most formularies. This is consistent with OIG’s annual findings since 2011.

Number of formularies including percentage of commonly used drugs



### What OIG Concludes

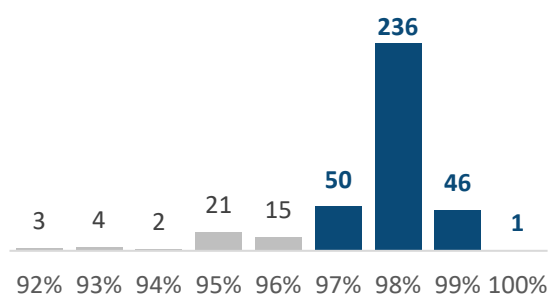
- Dual-eligible enrollees can expect to have access to most drugs in 2025, regardless of the Part D plan in which they are enrolled.

## Results

### A majority of 2025 Part D plan formularies covered almost all of the drugs that dual-eligible enrollees commonly use.

Of the 378 distinct formularies used by Part D plans in 2025, 333 covered at least 97 percent of commonly used drugs.

**Exhibit 1: Number of formularies including percentage of commonly used drugs.**



Source: OIG analysis of formulary data, 2025.

### A small number of commonly used drugs were not covered by most formularies.

Seven commonly used drugs were covered by fewer than 75 percent of formularies in 2025. However, the formularies did cover alternative drugs in the same respective therapeutic classes, as CMS requires.<sup>7</sup>

**Exhibit 2: Number of drugs not covered by most formularies by primary indication**

| Primary Indication                    | Number of Drugs                                                                                                                                                                                                                                             |
|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Diabetes                              |    |
| Muscle Relaxer                        |                                                                                                                                                                          |
| Chronic Obstructive Pulmonary Disease |                                                                                       |
| Gastroesophageal Reflux Disease       |                                                                                                                                                                          |

Source: OIG analysis of formulary data, 2025.

### A majority of formularies used by Part D benchmark plans covered almost all commonly used drugs.

Each year, the [Centers for Medicare & Medicaid Services \(CMS\)](#) identifies benchmark plans: Part D plans with premiums at or below a regional benchmark amount.<sup>3</sup> There were 85 benchmark plans in 2025, which used 10 distinct formularies. A majority (6 of 10) of the benchmark plans' formularies covered at least 97 percent of the most commonly used drugs, and the remaining 4 covered at least 92 percent.<sup>4</sup>

#### It is particularly important that benchmark plans include the most commonly used drugs because:

- Dual-eligible enrollees do not pay premiums for these plans.<sup>5</sup>
- When CMS randomly assigns dual-eligible enrollees to Part D plans, it assigns them to benchmark plans without considering their specific prescription drug needs.<sup>6</sup>

While dual-eligible enrollees have **several options** if their formularies do not cover specific drugs, these options require dual-eligible enrollees to take administrative actions and do not guarantee that they can get the drugs.



Dual-eligible enrollees have one chance per month to **switch to plans** that cover the prescription drugs they require.<sup>8</sup>



Dual-eligible enrollees can use an **exceptions and appeals process** to request coverage of nonformulary drugs by their plans.<sup>9</sup>



Dual-eligible enrollees can work with their prescribers to find an **alternative drug** covered by their plans.



Dual-eligible enrollees can **pay out of pocket** for the noncovered drugs.

## What OIG Concludes

When establishing formularies, Part D plans are permitted to balance Medicare enrollees' needs for adequate prescription drug coverage against the need to contain costs for plans and for the Part D program. Part D plans may omit certain drugs from prescription coverage in order to control costs. However, omitting drugs from coverage can also limit the ability of enrollees to access the prescription drugs they need.

In general, dual-eligible enrollees have access to nearly all of the most commonly used drugs via their Part D plan formularies in 2025. A majority of these formularies covered almost all commonly used drugs, and only a small number of commonly used drugs were not covered by most formularies. These findings are largely unchanged from OIG's findings reported from 2011 through 2024. Dual-eligible enrollees have several options if their formularies do not cover specific drugs, but these options may be burdensome and do not guarantee access to the drugs.

## Methodology

We determined whether the unique formularies used by Part D plans operating in 2025 cover the prescription drugs most commonly used by dual-eligible enrollees.

- We used the 2022 Medicare Current Beneficiary Survey (MCBS) Cost and Use data to create a list of drugs with the highest utilization by dual-eligible enrollees.
- We used the February 2025 First DataBank National Drug Data File to identify the drug product information for the drugs with the highest utilization by dual-eligible enrollees.
- To determine the drugs most commonly used by dual-eligible enrollees, we took the following steps:
  - We created a list of all drugs reported by dual-eligible enrollees surveyed in the 2022 MCBS, excluding territories.
  - We collapsed this list to a list of drugs based on their active ingredients.
  - We ranked the drugs by frequency of utilization, weighting the drug-event information from MCBS by sample weight.
  - We selected the 200 drugs with the highest utilization by dual-eligible enrollees.
- Of the top 200 drugs, we analyzed 194 drugs for this review. We removed six drugs not covered under Part D.
- We collected from CMS the formulary data and the plan data for Part D plans operating in 2025. The formulary data include Part D plans' formularies for plans operating in 2025.
- We then analyzed the unique Part D plan formularies to determine their rates of inclusion of the drugs commonly used by dual-eligible enrollees. We counted a drug as included in a Part D plan's formulary if the formulary included the active ingredient.

## Standards

We conducted this study in accordance with the *Quality Standards for Inspection and Evaluation* issued by the Council of the Inspectors General on Integrity and Efficiency.

## Appendix A: Top 200 Commonly Used Drugs\*

| No. | Generic Name                    | Percentage of Formularies Including Drug | No. | Generic Name                  | Percentage of Formularies Including Drug |
|-----|---------------------------------|------------------------------------------|-----|-------------------------------|------------------------------------------|
| 1   | Dexlansoprazole^                | 15%                                      | 30  | 0.9 % Sodium Chloride         | 100%                                     |
| 2   | Liraglutide^                    | 22%                                      | 31  | Benazepril Hcl                | 100%                                     |
| 3   | Umeclidinium Bromide^           | 65%                                      | 32  | Cyclobenzaprine Hcl           | 100%                                     |
| 4   | Insulin Degludec^               | 66%                                      | 33  | Empagliflozin                 | 100%                                     |
| 5   | Tiotropium Bromide^             | 68%                                      | 34  | Lovastatin                    | 100%                                     |
| 6   | Methocarbamol^                  | 73%                                      | 35  | Mirabegron                    | 100%                                     |
| 7   | Insulin Lispro^                 | 74%                                      | 36  | Nifedipine                    | 100%                                     |
| 8   | Insulin Aspart                  | 76%                                      | 37  | Valsartan/Hydrochlorothiazide | 100%                                     |
| 9   | Insulin Aspart Prot/Insulin Asp | 76%                                      | 38  | Acetaminophen With Codeine    | 100%                                     |
| 10  | Hydroxyzine Pamoate             | 83%                                      | 39  | Acyclovir                     | 100%                                     |
| 11  | Solifenacin Succinate           | 92%                                      | 40  | Albuterol Sulfate             | 100%                                     |
| 12  | Esomeprazole Magnesium          | 93%                                      | 41  | Alendronate Sodium            | 100%                                     |
| 13  | Temazepam                       | 93%                                      | 42  | Allopurinol                   | 100%                                     |
| 14  | Alprazolam                      | 94%                                      | 43  | Amiodarone Hcl                | 100%                                     |
| 15  | Linagliptin                     | 96%                                      | 44  | Amitriptyline Hcl             | 100%                                     |
| 16  | Sitagliptin Phos/Metformin Hcl  | 97%                                      | 45  | Amlodipine Besylate           | 100%                                     |
| 17  | Sitagliptin Phosphate           | 97%                                      | 46  | Ammonium Lactate              | 100%                                     |
| 18  | Bimatoprost                     | 97%                                      | 47  | Amoxicillin                   | 100%                                     |
| 19  | Fluticasone/Vilanterol          | 98%                                      | 48  | Amoxicillin/Potassium Clav    | 100%                                     |
| 20  | Dapagliflozin Propanediol       | 98%                                      | 49  | Anastrozole                   | 100%                                     |
| 21  | Semaglutide                     | 98%                                      | 50  | Apixaban                      | 100%                                     |
| 22  | Dulaglutide                     | 98%                                      | 51  | Aripiprazole                  | 100%                                     |
| 23  | Fenofibrate Nanocrystallized    | 98%                                      | 52  | Atenolol                      | 100%                                     |
| 24  | Insulin Glargine,hum.Rec.Anlog  | 98%                                      | 53  | Atorvastatin Calcium          | 100%                                     |
| 25  | Olmesartan Medoxomil            | 99%                                      | 54  | Azelastine Hcl                | 100%                                     |
| 26  | Fluticasone Propion/Salmeterol  | 99%                                      | 55  | Azithromycin                  | 100%                                     |
| 27  | Celecoxib                       | 99%                                      | 56  | Baclofen                      | 100%                                     |
| 28  | Fluticasone/Umeclidin/Vilanter  | 99%                                      | 57  | Benzotropine Mesylate         | 100%                                     |
| 29  | Meclizine Hcl                   | 99%                                      | 58  | Brimonidine Tartrate          | 100%                                     |

| No. | Generic Name                   | Percentage of Formularies Including Drug |
|-----|--------------------------------|------------------------------------------|
| 59  | Budesonide/Formoterol Fumarate | 100%                                     |
| 60  | Bumetanide                     | 100%                                     |
| 61  | Bupropion Hcl                  | 100%                                     |
| 62  | Buspirone Hcl                  | 100%                                     |
| 63  | Calcitriol                     | 100%                                     |
| 64  | Carbamazepine                  | 100%                                     |
| 65  | Carbidopa/Levodopa             | 100%                                     |
| 66  | Carvedilol                     | 100%                                     |
| 67  | Cephalexin                     | 100%                                     |
| 68  | Chlorthalidone                 | 100%                                     |
| 69  | Ciprofloxacin Hcl              | 100%                                     |
| 70  | Citalopram Hydrobromide        | 100%                                     |
| 71  | Clindamycin Phosphate          | 100%                                     |
| 72  | Clonazepam                     | 100%                                     |
| 73  | Clonidine Hcl                  | 100%                                     |
| 74  | Clopidogrel Bisulfate          | 100%                                     |
| 75  | Clotrimazole                   | 100%                                     |
| 76  | Colchicine                     | 100%                                     |
| 77  | Cyclosporine                   | 100%                                     |
| 78  | Dextroamphetamine/Amphetamine  | 100%                                     |
| 79  | Diazepam                       | 100%                                     |
| 80  | Diclofenac Sodium              | 100%                                     |
| 81  | Dicyclomine Hcl                | 100%                                     |
| 82  | Digoxin                        | 100%                                     |
| 83  | Diltiazem Hcl                  | 100%                                     |
| 84  | Divalproex Sodium              | 100%                                     |
| 85  | Donepezil Hcl                  | 100%                                     |
| 86  | Dorzolamide Hcl/Timolol Maleat | 100%                                     |
| 87  | Doxazosin Mesylate             | 100%                                     |
| 88  | Doxycycline Hyclate            | 100%                                     |
| 89  | Duloxetine Hcl                 | 100%                                     |

| No. | Generic Name                  | Percentage of Formularies Including Drug |
|-----|-------------------------------|------------------------------------------|
| 90  | Enalapril Maleate             | 100%                                     |
| 91  | Escitalopram Oxalate          | 100%                                     |
| 92  | Estradiol                     | 100%                                     |
| 93  | Ezetimibe                     | 100%                                     |
| 94  | Famotidine                    | 100%                                     |
| 95  | Finasteride                   | 100%                                     |
| 96  | Fluconazole                   | 100%                                     |
| 97  | Fluoxetine Hcl                | 100%                                     |
| 98  | Fluticasone Propionate        | 100%                                     |
| 99  | Furosemide                    | 100%                                     |
| 100 | Gabapentin                    | 100%                                     |
| 101 | Glimepiride                   | 100%                                     |
| 102 | Glipizide                     | 100%                                     |
| 103 | Hydralazine Hcl               | 100%                                     |
| 104 | Hydrochlorothiazide           | 100%                                     |
| 105 | Hydrocodone/Acetaminophen     | 100%                                     |
| 106 | Hydrocortisone                | 100%                                     |
| 107 | Hydroxychloroquine Sulfate    | 100%                                     |
| 108 | Hydroxyzine Hcl               | 100%                                     |
| 109 | Ibuprofen                     | 100%                                     |
| 110 | Icosapent Ethyl               | 100%                                     |
| 111 | Ipratropium Bromide           | 100%                                     |
| 112 | Ipratropium/Albuterol Sulfate | 100%                                     |
| 113 | Irbesartan                    | 100%                                     |
| 114 | Isosorbide Dinitrate          | 100%                                     |
| 115 | Isosorbide Mononitrate        | 100%                                     |
| 116 | Ketoconazole                  | 100%                                     |
| 117 | Labetalol Hcl                 | 100%                                     |
| 118 | Lactulose                     | 100%                                     |
| 119 | Lamotrigine                   | 100%                                     |
| 120 | Latanoprost                   | 100%                                     |

| No. | Generic Name                   | Percentage of Formularies Including Drug |
|-----|--------------------------------|------------------------------------------|
| 121 | Levetiracetam                  | 100%                                     |
| 122 | Levocetirizine Dihydrochloride | 100%                                     |
| 123 | Levofloxacin                   | 100%                                     |
| 124 | Levothyroxine Sodium           | 100%                                     |
| 125 | Linacotide                     | 100%                                     |
| 126 | Lisinopril                     | 100%                                     |
| 127 | Lisinopril/Hydrochlorothiazide | 100%                                     |
| 128 | Lithium Carbonate              | 100%                                     |
| 129 | Lorazepam                      | 100%                                     |
| 130 | Losartan Potassium             | 100%                                     |
| 131 | Losartan/Hydrochlorothiazide   | 100%                                     |
| 132 | Meloxicam                      | 100%                                     |
| 133 | Memantine Hcl                  | 100%                                     |
| 134 | Metformin Hcl                  | 100%                                     |
| 135 | Methotrexate Sodium            | 100%                                     |
| 136 | Methylprednisolone             | 100%                                     |
| 137 | Metoprolol Succinate           | 100%                                     |
| 138 | Metoprolol Tartrate            | 100%                                     |
| 139 | Mirtazapine                    | 100%                                     |
| 140 | Montelukast Sodium             | 100%                                     |
| 141 | Morphine Sulfate               | 100%                                     |
| 142 | Mupirocin                      | 100%                                     |
| 143 | Naproxen                       | 100%                                     |
| 144 | Nitrofurantoin Monohyd/M-Cryst | 100%                                     |
| 145 | Nitroglycerin                  | 100%                                     |
| 146 | Nystatin                       | 100%                                     |
| 147 | Olanzapine                     | 100%                                     |
| 148 | Omeprazole                     | 100%                                     |
| 149 | Ondansetron                    | 100%                                     |
| 150 | Ondansetron Hcl                | 100%                                     |
| 151 | Oxcarbazepine                  | 100%                                     |

| No. | Generic Name                  | Percentage of Formularies Including Drug |
|-----|-------------------------------|------------------------------------------|
| 152 | Oxybutynin Chloride           | 100%                                     |
| 153 | Oxycodone Hcl                 | 100%                                     |
| 154 | Oxycodone Hcl/Acetaminophen   | 100%                                     |
| 155 | Pantoprazole Sodium           | 100%                                     |
| 156 | Paroxetine Hcl                | 100%                                     |
| 157 | Pioglitazone Hcl              | 100%                                     |
| 158 | Potassium Chloride            | 100%                                     |
| 159 | Pravastatin Sodium            | 100%                                     |
| 160 | Prazosin Hcl                  | 100%                                     |
| 161 | Prednisolone Acetate          | 100%                                     |
| 162 | Prednisone                    | 100%                                     |
| 163 | Pregabalin                    | 100%                                     |
| 164 | Promethazine Hcl              | 100%                                     |
| 165 | Propranolol Hcl               | 100%                                     |
| 166 | Quetiapine Fumarate           | 100%                                     |
| 167 | Risperidone                   | 100%                                     |
| 168 | Rivaroxaban                   | 100%                                     |
| 169 | Roflumilast                   | 100%                                     |
| 170 | Ropinirole Hcl                | 100%                                     |
| 171 | Rosuvastatin Calcium          | 100%                                     |
| 172 | Sacubitril/Valsartan          | 100%                                     |
| 173 | Sertraline Hcl                | 100%                                     |
| 174 | Simvastatin                   | 100%                                     |
| 175 | Spironolactone                | 100%                                     |
| 176 | Sucralfate                    | 100%                                     |
| 177 | Sulfamethoxazole/Trimethoprim | 100%                                     |
| 178 | Tamsulosin Hcl                | 100%                                     |
| 179 | Timolol Maleate               | 100%                                     |
| 180 | Tizanidine Hcl                | 100%                                     |
| 181 | Topiramate                    | 100%                                     |
| 182 | Torsemide                     | 100%                                     |

| No. | Generic Name                   | Percentage of Formularies Including Drug |
|-----|--------------------------------|------------------------------------------|
| 183 | Tramadol Hcl                   | 100%                                     |
| 184 | Trazodone Hcl                  | 100%                                     |
| 185 | Triamcinolone Acetonide        | 100%                                     |
| 186 | Triamterene/Hydrochlorothiazid | 100%                                     |
| 187 | Valacyclovir Hcl               | 100%                                     |
| 188 | Valsartan                      | 100%                                     |
| 189 | Varicella-Zoster Ge/As01b/Pf   | 100%                                     |
| 190 | Venlafaxine Hcl                | 100%                                     |
| 191 | Verapamil Hcl                  | 100%                                     |

| No. | Generic Name                   | Percentage of Formularies Including Drug |
|-----|--------------------------------|------------------------------------------|
| 192 | Vortioxetine Hydrobromide      | 100%                                     |
| 193 | Warfarin Sodium                | 100%                                     |
| 194 | Zolpidem Tartrate              | 100%                                     |
| 195 | Alcohol Antiseptic Pads**      | Excluded                                 |
| 196 | Cholecalciferol (Vitamin D3)** | Excluded                                 |
| 197 | Ergocalciferol (Vitamin D2)**  | Excluded                                 |
| 198 | Folic Acid**                   | Excluded                                 |
| 199 | Insulin Detemir**              | Excluded                                 |
| 200 | Sevelamer Carbonate**          | Excluded                                 |

Source: OIG analysis of drugs commonly used by dual-eligible enrollees, 2025.

\* Of the top 200 drugs, we analyzed 194 drugs for this review.

^ These drugs are covered by fewer than 75% of formularies.

\*\* These drugs are excluded from our analysis because they are not covered by Part D.



## Endnotes

<sup>1</sup> Kaiser Family Foundation, *Medicare's Role for Dual Eligible Beneficiaries*. Accessed at <https://www.kff.org/wp-content/uploads/2013/01/8138-02.pdf> on May 16, 2025.

<sup>2</sup> For the mandate, see the Patient Protection and Affordable Care Act, P.L. No. 111-148 § 3313(a). For each study, OIG has reviewed drug coverage under Medicare Part D for all dual-eligible enrollees, rather than only for full-benefit dual-eligible enrollees as specified by the mandate. (Under Social Security Act § 1935(c)(6), full-benefit dual-eligible enrollees are individuals who are eligible for both Medicare and full Medicaid benefits.) With the data available for these studies, we could not confidently identify and separate full-benefit dual-eligible enrollees—and thus the drugs they used—from the total population of dual-eligible enrollees.

<sup>3</sup> Social Security Act § 1860D-14(b); 42 CFR § 423.780(b)(2)(i).

<sup>4</sup> In previous years, we assessed formularies used by all Part D plans—whether they were stand-alone Part D plans (PDPs) or were paired with Medicare Advantage plans (MA-PDs)—with premiums below the regional benchmark. This year, CMS data indicated which plans had premiums below the regional benchmark for PDPs only. Therefore, we included only PDPs with premiums below the benchmark for this analysis.

<sup>5</sup> Medicare subsidizes dual-eligible enrollees' premiums, deductibles, and other cost-sharing obligations up to a determined premium benchmark that varies by region. Medicare Prescription Drug, Improvement, and Modernization Act of 2003, P.L. No. 108-173 (enacted Dec. 8, 2003), § 101, Social Security Act § 1860D-14.

<sup>6</sup> CMS randomly assigns dual-eligible enrollees to a Part D plan with premiums below the regional benchmark when (1) they become eligible for both Medicare and Medicaid but have not elected a Part D plan; (2) their current Part D plan will have a premium above the regional benchmark for the following year; or (3) the plan to which they were assigned is terminated. CMS, Prescription Drug Benefit Manual (PDBM), ch. 3, §§ 40.1.4-5. As an additional protection, Section 3305 of the Patient Protection and Affordable Care Act requires that dual-eligible enrollees who are reassigned to a different plan receive information outlining the formulary coverage in their new plan for the drugs they are taking. The Patient Protection and Affordable Care Act, P.L. No. 111-148, § 3305.

<sup>7</sup> Plan formularies do not have to include every available drug. Rather, to meet CMS's formulary requirements, they generally must include at least two drugs in each therapeutic category or class. CMS, Prescription Drug Benefit Manual (PDBM), ch. 6, § 30.2.1.

<sup>8</sup> 42 CFR § 423.38(c)(4).

<sup>9</sup> CMS, Parts C & D Enrollee Grievances, Organization/Coverage Determinations, and Appeals Guidance, §§ 40-60.