State of Louisiana

Louisiana Department of Health
Office of Behavioral Health

MEMORANDUM

DATE: March 10, 2020

TO: Opioid Treatment Providers

CC: Karen Stubbs, Assistant Secretary

Dr. James E. Hussey, Medical Director

FROM: Traci M. Perry, MSN, RN

State Opioid Treatment Authority Executive Director of MAT-PDOA grant

SUBJECT: COVID-19

As per the Governor's Press Conference held on March 9, 2020, the Louisiana Department of Health (LDH) is implementing plans to meet the evolving needs of the Coronavirus (COVID-19). LDH endorses the recent Federal Regulatory guidance, which includes Centers for Disease Control (CDC), Centers for Medicare & Medicaid Services' (CMS), Substance Abuse and Mental Health Services Administration (SAMHSA), and National Accreditation bodies, which include but are not limited to Commission on Accreditation of Rehabilitation Facilities (CARF) and Joint Commission on the Accreditation of Healthcare Organizations (JCAHO).

Providers need to implement infection control measures just as you would with any virus such as Influenza.

- 1. Frequent Handwashing
- 2. Disinfecting Surfaces
- 3. Separate patients with symptoms of illness

In preparation for any potential public health emergency involving widespread infectious disease, providers should evaluate staffing contingency plans in the event of staff absences. Verify that you have the correct employee contact information.

Providers shall ensure that all staff receive orientation and ongoing training on the Louisiana Opioid Treatment Programs (OTP) quarterly regulatory topics; including emergency preparedness, and infection control. Methadone Federal Regulatory Agencies (Center for Substance Abuse Treatment (CSAT), SAMHSA & Drug Enforcement Administration (DEA)), indicated that all federal and state regulations shall be enforced and maintained. Any aberrance will be addressed as a licensure violation. Policies and procedures shall be implemented as directed by the State Opioid Treatment Authority (SOTA) on a case-by-case basis. For example, if a clinic in Shreveport is allowed to modify their dosing hours, it should not be assumed that a clinic in Lake Charles could modify their dosing hours. Please be reminded—

- 1. Clinics cannot close without approval of the SOTA
- 2. Clinics cannot modify dosing hours without approval of the SOTA
- 3. Clinics cannot alter the regulatory staffing ratio of 75:1 without approval of the SOTA
- 4. Blanket exception requests are not permissible
- 5. Clinics are prohibited from modifying take home doses as per state algorithms without approval of the SOTA
- 6. Clinics must maintain all federal regulations; it is not permissible to have a proxy to pick up Methadone.
- 7. Clinics may not change the location of dosing; all Methadone must be maintained at the address approved on your DEA and LA State Board of Pharmacy, SAMHSA, LDH license.
- 8. Review your disaster planning and modify as needed to address infectious disease related needs
- Clinics should work with the SOTA and DEA agents for guidance to order additional Methadone to facilitate contingency plans for dosing stable patients
- 10. Curbside dosing cannot be initiated without SOTA approval
- 11. Split dosing is not allowed without approval from the SOTA
- 12. Consider having your medical director to recommend or prescribe Naloxone overdose kits for all patients. As a reminder, LA's Non-Patient Specific Standing Order is still in effect and Naloxone is covered by Medicaid

LDH understands the magnitude of this unprecedented event. However, we emphasize the importance of maintaining contact and approval of the SOTA. Use this time to update your emergency action plans and every person who enters your clinic update contact information. Clinics should update or create social media and place signs in the lobby providing updates and contact information in the event of emergencies. I am available to help create alternate plans as COVID 19 unfolds. LDH endorses the CDC, CMS and SAMHSA guidance. For your convenience, I have attached helpful COVID 19 related documents and links below to address staff and patient care.

COVID-19 General Information Line 1-855-523-2652 M-F 8am-4:30pm	LDH
www.cdc.gov/coronavirus/covid19 https://www.cdc.gov/coronavirus/2019- nCoV/hcp/index.html	Centers for Disease Control and Prevention (CDC)
https://www.cdc.gov/vaccines/videos/coronavirus/COVID-19-webinar.pdf	CDC: Webinar
http://www.emergency.louisiana.gov/	Louisiana's Emergency Information Website
Interim Guidance for Preventing 2019 Novel Coronavirus (2019-nCoV) from Spreading to Others in Homes and Communities	Centers for Disease Control
https://www.cdc.gov/coronavirus/2019- ncov/communication/factsheets.html	CDC: Communication for Staff and the Public
https://www.cdc.gov/coronavirus/2019-ncov/specific-groups/index.html	CDC: For Businesses
https://www.cms.gov/medicare/quality-safety-oversight-general-information/coronavirus	CMS: COVID 19 Quality, Safety Guidance

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