



State of Louisiana
Louisiana Department of Health
Office of Behavioral Health

MEMORANDUM

DATE: March 23, 2020

TO: Opioid Treatment Providers

CC: Karen Stubbs, Assistant Secretary
Dr. James E. Hussey, Medical Director
Dr. Marcus Bacchuber, Medicaid Medical Director

FROM: Traci M. Perry, MSN, RN
State Opioid Treatment Authority
Executive Director of MAT-PDOA grant

SUBJECT: COVID-19 UPDATED

With the Governor's Proclamation of Emergency, we have implemented SAMHSA's 28-day approval for stable Methadone patients and 14 days for unstable patients. All patients should be given a Naloxone overdose kit. Naloxone overdose kits are covered by Medicaid and available at pharmacies utilizing LA's Non-patient specific standing order. We do not recommend allowing 28 days for every patient. Patients need to be assessed and prescribed utilizing your medical judgment as to remaining in recovery with 14 or 28 days of Methadone.

- The Governor's Proclamation of Emergency may be accessed here: <http://gohsep.la.gov/portals/0/News/25-JBE-2020-COVID-19.pdf>
- Curbside dosing is permissible without an exception request. The patient's chart should document the dosing.

As a result of COVID 19, the telehealth requirements have been relaxed. As per the 3/16/20 guidance, telehealth may be provided via phone, Skype or Face Time. The documentation of the telehealth counseling needs to include start and stop time and content. Use your judgement and adhere to all LA Department of Health and CDC guidelines. We do not mandate telehealth. However, it is an option to facilitate continuity of care. If you do continue to counsel in person, we recommend social distancing of 10 ft. and call the patient ahead to screen and determine whether face to face is advisable. Use your professional judgement.

- U.S Department of Health and Human Services (HHS) announced, communications apps, such as FaceTime or Skype, when used in good faith for any telehealth treatment or diagnostic purpose, regardless of whether the telehealth service is directly related to COVID-19 can be utilized.
- The Notification of Enforcement Discretion on telehealth remote communications may be found at:
<https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/index.html>.
- DEA-registered practitioners may issue prescriptions for buprenorphine and other controlled substances to patients for whom they have not conducted an in-person medical evaluation, provided all of the following conditions are met:
 1. The prescription is issued for a legitimate medical purpose by a practitioner acting in the usual course of his/her professional practice
 2. The telemedicine communication is conducted using an audio-visual, real-time, two-way interactive communication system.
 3. The practitioner is acting in accordance with applicable Federal and State law.
- Provided the practitioner satisfies the above requirements, the practitioner may issue the prescription using any of the methods of prescribing currently available and in the manner set forth in the DEA regulations. Thus, the practitioner may issue a prescription either electronically (for schedules II-V) or by calling in an emergency schedule II prescription to the pharmacy, or by calling in a schedule III-V prescription to the pharmacy. [\[Learn more\]](#)

DEA COVID 19 disaster guidance indicates that 42 CFR will allow verbal consent for treatment. Dose evaluations may be conducted by phone for existing patients. SAMHSA does not endorse upward titration of Methadone utilizing Telemedicine. In addition, telemedicine is not allowed for admission of Methadone patients

- For more information on HIPAA and COVID-19, see OCR's February 2020 Bulletin:
<https://www.hhs.gov/sites/default/files/february-2020-hipaa-and-novel-coronavirus.pdf> - PDF

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

Reminders:

1. Clinics cannot close without approval of the SOTA
2. The Methadone Central Registry must be updated on a daily basis
3. Clinics cannot modify dosing hours without approval of the SOTA

LDH understands the magnitude of this unprecedented event. However, we emphasize the importance of maintaining contact with the SOTA. **Your emergency action plans must be reviewed and updated on a daily basis. Clinics should utilize social media and signage providing updates and information.**

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