[Agency Letterhead]

Opioid Treatment Program Blanket Regulatory Relief Waiver

1. All patients who have chronic medical conditions and/or who are otherwise vulnerable to infection: Patients who meet this criteria will be given up to a 28-day supply of take homes, using the federal 8-point criteria as a guide and our Medical Director will work with the medical and clinical staff to employ a risk/benefit analysis that considers risk of diversion in comparison to risk of infection to the patient, as well as the risk of transmission of the virus to staff and other patients. **Patients in this vulnerable population criteria will also be given special dispensing times separate from the clinic’s general patient population as well as separate from patients in the “lab confirmed COVID-19 disease” and/or “signs/symptoms” category.**
2. Take home medication exceptions for patients with laboratory confirmed COVID-19 disease: Patients with signs and/or symptoms of a respiratory viral illness, with or without confirmation via COVID-19 viral testing, present an immediate risk to the rest of the patient population and OTP staff. Patients with lab-confirmed COVID-19 will receive 28 days of medication immediately and will not present for dosing to the clinic. Clinical team will maintain contact with patient via telehealth and/or telephonic sessions routinely and as needed. **Patients who meet these criteria will also be given special dispensing times separate from the clinic’s general patient population as well as separate from patients in the vulnerable population criteria.**
3. For patients with signs/symptoms of a respiratory infection, e.g., cough and/or fever: As described above, patients with symptoms of a respiratory viral illness, with or without confirmation via COVID-19 viral testing, present an immediate risk to the rest of the patient population and OTP staff. Such patients will be given a surgical mask, isolated, and evaluated by a medical provider using appropriate PPE, who will make a determination as to a safe number of take-home doses, taking into consideration the patient’s stability in treatment and ability to safely store and protect the medication, up to 28 days of medication. **Patients who meet these criteria will also be given special dispensing times separate from the clinic’s general patient population as well as separate from patients in the vulnerable population criteria.**
4. All patients with significant medical comorbidities and/or older patients (over the age of 50): Patients over the age of 50 and/or with medical conditions such as but not limited to pulmonary, cardiac, renal or liver disease, immunosuppression, or diabetes will be eligible for take-home medications up to 28 days, at the clinical discretion of the Medical Director. **Patients in this vulnerable population criteria will also be given special dispensing times separate from the clinic’s general patient population as well as separate from patients in the “lab confirmed COVID-19 disease” and/or “signs/symptoms” category.**
5. For select patients who have already qualified for 1 or more additional take home doses: Such patients will be assessed for likely ongoing compliance and stability. In the context of a public health emergency of this scale, these patients have meaningfully fulfilled the federal 8-point criteria and have done so for a period sufficiently long, demonstrating progressive clinical stability and will be provided anywhere between 7-28 days of medication as clinically and medically appropriate.
6. For select patients with no or only one take home (unearned): Medical Director will work with medical and clinical team to assess appropriateness for a staggered take-home schedule whereby remaining patient census will be divided to come in on alternating days while providing 1-2 take homes as appropriate during the COVID-19 crisis. This reduces the clinic’s daily census and has a tolerable risk profile, as patients are still evaluated frequently and do not receive more than 2 days of take home medication at any one time. *Note: Certain patients, exhibiting some treatment progress, can be provided up to 7 days take home, as clinically determined with approval from the Medical Director*.
7. Patients on buprenorphine: During the COVID-19 crisis, patients being dispensed buprenorphine will be temporarily switched from dispensing to prescribing it as deemed clinically appropriate and safe by the medical team.
8. Unstable patients: Patients in any of the population categories above who are determined unstable or unsafe to manage and/or store any take home doses will continue daily dosing in the clinic. Inability to safely take and/or store unsupervised medication due to a cognitive or psychiatric condition, or inability to keep a take home doses of medication safe due to a chaotic living situation (e.g., certain types of homelessness) are some of the factors that will be assessed for patients being deemed ineligible for an emergency take home exemption. For these patients who, for safety reasons, need to continue daily dosing, see separation precautions listed above that are being made to limit exposures from patients possibly symptomatic for COVID-19, as well as to older and/or medically fragile patients.
9. Patients who are new admits: Throughout this crisis, new admits and guest dosing will be assessed based on individual considerations.
10. Designated other/surrogate: To ensure all patients are medicated during this crisis and as the state of emergency progresses, we will also consider home and/or curbside delivery methods as applicable. To that end, [Agency Name] would like to request waiver for this requirement as well to allow any OTP staff deemed appropriate by the clinic to deliver medication. Also to be able establish an agreement and use a medical courier service if/when needed or applicable.
11. All Patients: During this waiver period, clinical staff will continue to maintain contact with patients on their caseload by providing telephonic and/or telehealth sessions. Frequency of sessions will be based on patient’s level of assessed stability and as needed.

Note: All patients will be instructed and educated on protecting their medication from theft and exposure to children or animals. The clinic will remain open during regular business hours to field calls from patients who are receiving take home medications, and after-hours number will remain active to receive patient calls. The efficacy and safety of this take home strategy will be continually assessed by the medical and clinical team.