



LICENSING ALERT

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Deputy Secretary for Quality Assurance

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Division of Drug and Alcohol Program Licensure
Licensing Alert 02-09

NARCOTIC TREATMENT PROGRAM MEDICATION TAKE-HOME PRIVILEGES

A narcotic treatment program (NTP) is permitted to grant medication take-home privileges to patients in accordance with the requirements of 28 Pa. Code § 715.16 (§ 715.16). The Department of Health, Division of Drug and Alcohol Program Licensure (Division) has examined its current process regarding the advanced review and approval of an NTP's determination to make exceptions to the requirements in § 715.16(c) relating to the length of time of satisfactory adherence to NTP rules and number of days of take-home medication, and determined that such advanced review and approval will no longer be required.

Beginning with the issuance of this Alert, an NTP may make an exception to the requirements in § 715.16(c) relating to the length of time of satisfactory adherence to NTP rules and number of days of take-home medication when the exception is made in accordance with § 715.16(d)-(f). Exceptions to the requirements of § 715.16(c) which do not comply with § 715.16(d)-(f) are not permitted.

It will be the responsibility of every NTP to establish policies and procedures to implement § 715.16 to determine whether a patient may be granted medication take-home privileges. To ensure program compliance with § 715.16(d) the NTP shall maintain documentation in the patient record that, in the reasonable clinical judgment of the NTP's physician, a patient has: (1) a permanent physical disability; (2) a temporary disability; or, (3) an exceptional circumstance such as illness, personal or family crisis, or travel, which interferes with the patient's ability to conform to the applicable mandatory attendance schedules in § 715.16(c). In all cases, the patient shall demonstrate an ability to responsibly handle narcotic drugs.

NTPs are reminded of the additional requirements in § 715.16(e) and (f). In making an exception, an NTP may not permit a patient to receive more than a 2-week take-home supply of medication. Furthermore, the exception shall continue only for as long as the temporary disability or exceptional circumstance exists. If a patient is permanently disabled, the patient's case shall be reviewed by the NTP at least annually to determine whether the need for the

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exception still exists. NTPs should also be aware that they continue to be required to observe the requirements 42 CFR § 8.12(i), and at no time shall an exception be granted under § 715.16(d) violate the requirements of 42 CFR § 8.12(i).

Documentation will be reviewed during the Division's surveys of the NTP to ensure compliance with the requirements for take-home privileges in § 715.16 and 42 CFR § 8.12(i). NTPs should not submit requests for advanced review of the exceptions. Any exceptions related to this Alert submitted to the Department for advanced review will be returned to the NTP.

Questions regarding this Alert may be directed to the Division of Drug and Alcohol Program Licensure, Telephone 717-783-8675.

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