

# Substance Use Disorder Treatment During COVID-19: Guidelines for Continuation of Care

University of Pittsburgh School of Pharmacy Program Evaluation and Research Unit  
March 27, 2020

As the world adjusts to the uncertainty and disruptions posed by COVID-19, PERU recognizes the **disproportionate impact on people living with behavioral health conditions** and the professionals who work with them. Many people living with substance use disorders have other co-occurring mental and physical health conditions that put them at [increased risk for harm](#). PERU will continue to be available throughout the duration of the COVID-19 pandemic to support our collaborators in providing these essential treatments and services for individuals with substance use disorders.

The table below lists concerns related to COVID-19 for individuals living with behavioral health conditions and strategies for addressing them. Many of the strategies contain hyperlinks to relevant resources.

Potential Concerns	Strategies
Patients may <a href="#">increase substance use</a> as a <b>coping mechanism</b> for stress and fear.	<ul style="list-style-type: none"> <li>Increase support and communication to patients. Communicate about any expected changes to the treatment plan and strategies for ensuring continuity of care.</li> <li>Recommend <a href="#">outpatient and telehealth</a> mental health and substance use disorder treatment whenever possible. Inpatient treatment should be reserved for those with life-threatening mental health disorders.</li> </ul>
Drug and alcohol supply disruption puts patients at an increased <b>risk of withdrawal or overdose</b> .	<ul style="list-style-type: none"> <li>Provide patients with resources about self-management of substance use and <a href="#">harm reduction strategies</a> such as alternatives to drug injection when clean needles become unavailable.</li> <li>Provide patients with a prescription for naloxone. This is particularly important for patients in high-risk populations, like those who are pregnant or who have recently been released from incarceration.</li> <li>Review <a href="#">treatment considerations</a> for patients with alcohol use disorder or benzodiazepine use disorder that increase risk of seizures due to withdrawal.</li> </ul>
Social distancing prevents patients from coming for <b>regular appointments</b> .	<ul style="list-style-type: none"> <li>Use <a href="#">telehealth and/or telephonic services</a> for evaluation and treatment of patients.</li> <li>Understand that the requirement to obtain written patient consent for disclosure of substance use disorder records under 42 C.F.R. Part 2 <a href="#">may not apply in a bona fide medical emergency</a> in which the patient's prior informed consent cannot be obtained.</li> <li>Provide <a href="#">extended buprenorphine</a> prescriptions for appropriate patients who can safely handle/store this medication. Check the PDMP prior to prescribing.</li> </ul>
Patients may require assistance in <b>setting up</b> and <b>accessing</b> telehealth services and virtual recovery resources.	<ul style="list-style-type: none"> <li>Educate patients about telehealth goals, and requirements that <a href="#">vary by insurance</a>.</li> <li>Provide instructional or educational handouts about telehealth set up, access, and visit protocols.</li> <li>Identify a telehealth, video, or audio application/service that is <a href="#">accessible for the patient</a>.</li> <li>Share <a href="#">virtual recovery resources</a> with your patients.</li> </ul>
Social distancing discourages new patient <b>buprenorphine induction</b> .	<ul style="list-style-type: none"> <li>Use <a href="#">real-time audio-visual communication</a> for initial appointments.</li> <li>Plan for home-based buprenorphine induction, which is considered both <a href="#">safe and effective</a>.</li> </ul>
Social distancing disrupts <b>support groups and counseling services</b> .	<ul style="list-style-type: none"> <li>Share <a href="#">virtual recovery resources</a> with your patients.</li> <li>Use <a href="#">telepsychiatry</a> to minimize disruptions to mental health appointments.</li> </ul>
Patients face <b>financial uncertainty</b> and have new unmet needs.	<ul style="list-style-type: none"> <li>Connect patients with <a href="#">resources and information</a> to assist with financial and emerging needs.</li> <li>Understand that telehealth is <a href="#">reimbursed through Medicaid</a> and often covered by private insurance.</li> </ul>
<b>Staff</b> are under increased <b>stress</b> and patient contact poses an <b>infection risk</b> .	<ul style="list-style-type: none"> <li>Acknowledge the stress staff may be experiencing and share <a href="#">stress-reduction resources</a>.</li> <li>Support remote work for staff whose roles enable working remotely.</li> <li>Provide staff with guidance on <a href="#">infection control measures</a> and provide appropriate supplies/equipment (e.g., respirators, gloves, eye protection, surface disinfectant, hand sanitizer).</li> </ul>

\*For more information on implementation and evaluation support and technical assistance (e.g., telehealth coordination and implementation) in response to COVID-19, please contact **Jack Warwick, Program Director** via [jswarwick@pitt.edu](mailto:jswarwick@pitt.edu).

## Codes, Regulations, and Guidelines

Please see the following series of tables for a list of recent updates/clarifications made to important substance use disorder treatment-related codes, regulations, and guidelines issued in response to the ongoing COVID-19 pandemic.

SUD Treatment During COVID-19: Code, Regulation, and Guideline Updates and Clarifications				
All Provider Types				
Topic	Code/Regulation/Guideline	Description	Update/Clarification	Link
Confidentiality	42 CFR Part 2	Outlines circumstances in which a patient's treatment information may be disclosed without prior consent.	The requirement to obtain written patient consent for disclosure of substance use disorder records may not apply in a bona fide medical emergency in which the patient's prior informed consent cannot be obtained, including telehealth encounters.	<a href="https://www.samhsa.gov/sites/default/files/covid-19-42-cfr-part-2-guidance-03192020.pdf">https://www.samhsa.gov/sites/default/files/covid-19-42-cfr-part-2-guidance-03192020.pdf</a>
	71 P.S. § 1690.108(c)(3)	Details patient medical record confidentiality in emergency situations. (Pennsylvania)	The COVID-19 pandemic can constitute an emergency situation that allows providers to release patient information to medical personnel without prior consent if necessary.	<a href="https://www.ddap.pa.gov/Get%20Help%20Now/Documents/COVID-CFR.pdf">https://www.ddap.pa.gov/Get%20Help%20Now/Documents/COVID-CFR.pdf</a>
	4 Pa. Code § 255.5(a)(9)	Details patient medical record confidentiality in emergency situations. (Pennsylvania)		
Telehealth/Telemedicine Access	Health Insurance Portability and Accountability Act of 1996 (HIPAA) and Health Information Technology for Economic and Clinical Health (HITECH) Act	Both acts provide regulations to protect the privacy and security of patient health information.	The Department of Health and Human Services (HHS) will not impose regulatory noncompliance penalties against covered providers who are providing telehealth services in "good faith" during the COVID-19 nationwide public health emergency.  Allows providers to use "any non-public facing remote communication product" available to the patient to communicate.	<a href="https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html">https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html</a>
	Social Security Act Section 1135 Waivers	The Social Security Act authorizes a variety of social services programs. Section 1135 of the act allows the HHS secretary to temporarily modify or waive certain requirements in the event of an emergency.	The Centers for Medicare & Medicaid Services (CMS) authorized a variety of services to be provided to beneficiaries via telehealth without having to travel to a healthcare facility.  For the duration of the national COVID-19 public health emergency, authorized telehealth services will be reimbursed at the same rate as in-person visits.	<a href="https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet">https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet</a>

## SUD Treatment During COVID-19: Code, Regulation, and Guideline Updates and Clarifications

### All Provider Types

Topic	Code/Regulation/Guideline	Description	Update/Clarification	Link
<b>Healthcare Professional Licensing Restrictions</b>	Pennsylvania Department of State Media Release - 3/18/20	Update addresses health care professional licensing and telemedicine during the coronavirus emergency. (Pennsylvania)	Health care professionals licensed under any of the Department of State's Bureau of Professional and Occupational Affairs (BPOA) licensing boards can provide services to patients via telemedicine during the coronavirus emergency. Professional licensing authorization is separate and apart from any insurance coverage/payment issues. Out-of-state licensed practitioners may seek approval to provide telemedicine within Pennsylvania.	<a href="https://www.media.pa.gov/Pages/State-details.aspx?newsid=375">https://www.media.pa.gov/Pages/State-details.aspx?newsid=375</a>

## SUD Treatment During COVID-19: Code, Regulation, and Guideline Updates and Clarifications

### Physical Health Providers

Topic	Code/Regulation/Guideline	Description	Update/Clarification	Link
<b>Telehealth</b>	SAMHSA FAQ Document	Guidance on telehealth buprenorphine treatment for practitioners with a DATA 2000 waiver.	Practitioners with a DATA 2000 waiver working outside the context of an OTP can treat new and existing patients with buprenorphine via telehealth (including use of telephone, if needed).	<a href="https://www.samhsa.gov/sites/default/files/faqs-for-oud-prescribing-and-dispensing.pdf">https://www.samhsa.gov/sites/default/files/faqs-for-oud-prescribing-and-dispensing.pdf</a>

## SUD Treatment During COVID-19: Code, Regulation, and Guideline Updates and Clarifications

### Behavioral Health Providers

Topic	Code/Regulation/Guideline	Description	Update/Clarification	Link
<b>Telehealth</b>	PA Department of Human Services Memorandum	Preference for the use of telehealth as a delivery method for medically necessary behavioral health services via expanded means (e.g., using telephonic video on smart phones or other electronic devices and using telephone when video is not available). (Pennsylvania)	Providers currently approved to provide services through telehealth may immediately begin to implement expanded use of telehealth. Providers not currently approved may immediately begin to implement telehealth but are required to submit the Attestation Form required by Bulletin OMHSAS-20-02 within 5 days of initiating.	<a href="https://www.dhs.pa.gov/providers/Providers/Documents/Coronavirus%202020/OMHSAS%20COVID-19%20Telehealth%20Expansion-%20Final%203.15.20.pdf">https://www.dhs.pa.gov/providers/Providers/Documents/Coronavirus%202020/OMHSAS%20COVID-19%20Telehealth%20Expansion-%20Final%203.15.20.pdf</a>

## SUD Treatment During COVID-19: Code, Regulation, and Guideline Updates and Clarifications

### Behavioral Health Providers

Topic	Code/Regulation/Guideline	Description	Update/Clarification	Link
	PA Department of Drug and Alcohol Programs: Information Bulletin 01-20	SCAs may use grant funds they have received from DDAP for outpatient SUD treatment facilities to provide counseling and other clinical services using telehealth technology. (Pennsylvania)	SUD counselors can provide telehealth using real-time, two-way interactive audio-video transmission services in licensed Drug and Alcohol Outpatient clinics. While the two-way interactive transmission is the preferred method, services provided by telephone and in the home are also acceptable.	<a href="https://www.ddap.pa.gov/Documents/Information%20Bulletins/IB%2001-20.pdf">https://www.ddap.pa.gov/Documents/Information%20Bulletins/IB%2001-20.pdf</a>
<b>Operational Guidance</b>	Department of Human Services (DHS), Office of Office of Mental Health and Substance Abuse Services (OMHSAS): Guidance Document	Contains list of recommendations for County Mental Health Programs, Behavioral Health Service Providers, Primary Contractors, Behavioral Health Managed Care Organizations	Exercise and promote hygienic practices. Review agency emergency preparedness plan and infection control procedures. Report all suspected cases of COVID-19 to OMHSAS. Contact OMHSAS before making any changes to your business practice whenever possible (e.g., suspending services at a service location or temporarily closing programs, closing county offices). Document what actions were taken and maintain evidence for why actions were taken.	<a href="https://www.dhs.pa.gov/providers/Providers/Documents/Coronavirus%202020/OMHSAS%20COVID-19%20Guidance%20Final%20-%20203.14.20.pdf">https://www.dhs.pa.gov/providers/Providers/Documents/Coronavirus%202020/OMHSAS%20COVID-19%20Guidance%20Final%20-%20203.14.20.pdf</a>

## SUD Treatment During COVID-19: Code, Regulation, and Guideline Updates and Clarifications

### Opioid Treatment Programs

Topic	Code/Regulation/Guideline	Description	Update/Clarification	Link
<b>Medication Take-Home Dosing Regulations</b>	42 CFR § 8.12(i)	Federal regulations for OTPs provide specific limits on the unsupervised or "take-home" supply of opioid agonist treatment medication.	SAMHSA has advised that states may request blanket exceptions for all stable patients in an OTP to receive 28 take-home doses of the patient's medication for opioid use disorder.  The state may request up to 14 days of take-home medication for less stable patients who the OTP believes can safely handle this level of medication.	<a href="https://www.samhsa.gov/sites/default/files/otp-guidance-20200316.pdf">https://www.samhsa.gov/sites/default/files/otp-guidance-20200316.pdf</a>

## SUD Treatment During COVID-19: Code, Regulation, and Guideline Updates and Clarifications

### Opioid Treatment Programs

Topic	Code/Regulation/Guideline	Description	Update/Clarification	Link
	28 Pa. Code § 715.16(e).	Pennsylvania regulations prohibit OTPs/NTPs from allowing patients to receive more than a two-week take-home supply of medication. (Pennsylvania)	PA DDAP has advised that, for the duration of the disaster emergency, NTPs have been granted a blanket exception for all stable patients to receive 28 days of take-home doses of the patient's medication for OUD. Less stable patients may receive up to 14 days of take-home medication, if deemed safe. Considerations determining appropriateness of take-home doses are listed in federal (42 C.F.R. § 8.12(i)(2)) and state (28 Pa. Code § 715.16(b)) regulations.	<a href="https://www.ddap.pa.gov/Licensing/Documents/Licensing%20Alerts/Alert%202020-01.pdf">https://www.ddap.pa.gov/Licensing/Documents/Licensing%20Alerts/Alert%202020-01.pdf</a>
<b>Treatment Admission</b>	42 C.F.R. § 8.12(f)(2)	Federal law requires a complete physical evaluation before admission to an OTP.	SAMHSA has granted an exemption to OTPs from performing in-person physical evaluations for new buprenorphine patients during the national emergency period. This exemption <b>does not apply to new methadone patients.</b>	<a href="https://www.samhsa.gov/sites/default/files/faqs-for-oud-prescribing-and-dispensing.pdf">https://www.samhsa.gov/sites/default/files/faqs-for-oud-prescribing-and-dispensing.pdf</a>

## SUD Treatment During COVID-19: Code, Regulation, and Guideline Updates and Clarifications

### Licensed Residential Drug and Alcohol Treatment Providers

Topic	Code/Regulation/Guideline	Description	Update/Clarification	Link
<b>Flex Beds</b>	Pennsylvania Department of Health Division of Drug and Alcohol Program Licensing: Licensing Alert 1-94 and Licensing Alert 4-97	Provide regulation and guidance regarding licensed treatment facility capacity limits for various drug and alcohol treatment activities. (Pennsylvania)	Upon request and approval by PA DDAP, a facility may utilize empty "beds" in one activity to conduct services provided in the other activity, referred to as 'flex beds'.	<a href="https://www.ddap.pa.gov/Get%20Help%20Now/Documents/COVID-flexbeds.pdf">https://www.ddap.pa.gov/Get%20Help%20Now/Documents/COVID-flexbeds.pdf</a>

## ADDITIONAL RESOURCES

---

Please see the following list of resources for additional information regarding the provision of substance use disorder treatment during the ongoing COVID-19 pandemic. Most of these resources have been released in response to the pandemic or were released in 2020.

### Behavioral Health and Mental Health

- SAMHSA - Considerations for the Care and Treatment of Mental and Substance Use Disorders in the COVID-19 Epidemic  
→ <https://www.samhsa.gov/sites/default/files/considerations-care-treatment-mental-substance-use-disorders-covid19.pdf>
- APA - Telepsychiatry and COVID-19  
→ <https://www.psychiatry.org/psychiatrists/practice/telepsychiatry/blog/apa-resources-on-telepsychiatry-and-covid-19>
- PA Department of Human Services Office of Mental Health and Substance Abuse Services Bulletin: Guidelines for the Use of Telehealth Technology in the Delivery of Behavioral Health Services  
→ <https://www.dhs.pa.gov/docs/Publications/Documents/FORMS%20AND%20PUBS%20MHSAS/Final%20-%20MHSAS%20Telehealth%20Bulletin%202.20.20.pdf>
- Centers for Disease Control and Prevention: Manage Anxiety and Stress  
→ [https://www.cdc.gov/coronavirus/2019-ncov/prepare/managing-stress-anxiety.html?CDC\\_AA\\_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fabout%2F coping.html](https://www.cdc.gov/coronavirus/2019-ncov/prepare/managing-stress-anxiety.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fabout%2F coping.html)
- Centers for Disease Control and Prevention: Taking Care of Your Emotional Health  
→ <https://emergency.cdc.gov/coping/selfcare.asp>
- US Department of Veterans Affairs, National Center for PTSD: Managing Stress Associated with the COVID-19 Virus Outbreak  
→ [https://www.ptsd.va.gov/covid/COVID\\_managing\\_stress.asp](https://www.ptsd.va.gov/covid/COVID_managing_stress.asp)

### Buprenorphine and Methadone Prescribing and Treatment Guidelines

- SAMHSA: Opioid Treatment Program (OTP) Guidance in Response to COVID-19  
→ <https://www.samhsa.gov/sites/default/files/otp-guidance-20200316.pdf>
- SAMHSA: FAQs - Provision of methadone and buprenorphine for the treatment of OUD in the COVID-19 Emergency  
→ <https://www.samhsa.gov/sites/default/files/faqs-for-oud-prescribing-and-dispensing.pdf>
- Updated Executive Summary of the Focused Update of the ASAM National Practice Guideline for the Treatment of Opioid Use Disorder  
→ [https://www.asam.org/docs/default-source/quality-science/jam-exec-summary.pdf?sfvrsn=a40a52c2\\_2](https://www.asam.org/docs/default-source/quality-science/jam-exec-summary.pdf?sfvrsn=a40a52c2_2)

### Drug Testing

- American Society of Addiction Medicine (ASAM): COVID-19 - Infection Mitigation in Outpatient Settings  
→ <https://www.asam.org/Quality-Science/covid-19-coronavirus/infection-mitigation-in-outpatient-settings#TestingProtocols>

### Financial and Other Resources

- Commonwealth of Pennsylvania  
→ <https://www.pa.gov/guides/responding-to-covid-19/#ForIndividuals>

### Harm Reduction

- Guidance for People Who Use Substances on COVID-19 (Novel Coronavirus)  
→ <https://files-profile.medicine.yale.edu/documents/2a2cbbfd-b047-4aff-9034-d618a36faf8b>

### High Risk Populations

- NIDA: COVID-19 - Potential Implications for Individuals with Substance Use Disorders  
→ <https://www.drugabuse.gov/about-nida/noras-blog/2020/03/covid-19-potential-implications-individuals-substance-use-disorders>

### Infection Control

- Centers for Disease Control and Prevention: Interim Infection Prevention and Control Recommendations for Patients with Suspected or Confirmed Coronavirus Disease 2019 (COVID-19) in Healthcare Settings  
→ <https://www.cdc.gov/coronavirus/2019-ncov/infection-control/control-recommendations.html>
- World Health Organization: Coronavirus disease (COVID-19) Technical Guidance - Infection Prevention and Control / WASH  
→ <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance/infection-prevention-and-control>
- World Health Organization: Coronavirus disease (COVID-19) Technical Guidance - Guidance for Health Workers  
→ <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance/health-workers>

## **Pennsylvania Resources**

- PA Department of Drug and Alcohol Programs: Telehealth Expansion  
→ <https://www.ddap.pa.gov/Get%20Help%20Now/Documents/COVID-Telehealth.pdf>
- PA Department of Drug and Alcohol Programs: Use of Telehealth for Outpatient Drug and Alcohol Services Funded by the Single County Authority  
→ <https://www.ddap.pa.gov/Documents/Information%20Bulletins/IB%2001-20.pdf>
- PA Department of Human Services Office of Mental Health and Substance Abuse Services: Guidance from the Department of Human Services (DHS), Office of Office of Mental Health and Substance Abuse Services (OMHSAS) regarding Coronavirus Disease 2019 (COVID-19)  
→ <https://www.dhs.pa.gov/providers/Providers/Documents/Coronavirus%202020/OMHSAS%20COVID-19%20Guidance%20Final%20-%203.14.20.pdf>
- PA Department of Human Services Office of Mental Health and Substance Abuse Services: Telehealth Guidelines Related to COVID-19  
→ <http://www.paproviders.org/wp-content/uploads/2020/03/OMHSAS-COVID-19-Telehealth-Expansion-Final-3.15.20.pdf#page=1>

## **Recovery Support**

- Virtual Recovery Resources  
→ <https://www.samhsa.gov/sites/default/files/virtual-recovery-resources.pdf>

## **Resource Pages**

- Drug Enforcement Agency COVID-19 Resource Page  
→ <https://www.dea.gov/diversion/usdoj/coronavirus.html>
- Foundation for Opioid Response Efforts: COVID-19 Resources  
→ <https://forefdn.org/resources/?res=covid-19>

## **Telehealth/Telemedicine**

- AMA Quick Guide to Telemedicine in Practice  
→ <https://www.ama-assn.org/practice-management/digital/ama-quick-guide-telemedicine-practice>
- DEA Information on Telemedicine  
→ [https://www.samhsa.gov/sites/default/files/programs\\_campaigns/medication\\_assisted/dea-information-telemedicine.pdf](https://www.samhsa.gov/sites/default/files/programs_campaigns/medication_assisted/dea-information-telemedicine.pdf)
- Notification of Enforcement Discretion for Telehealth Remote Communications  
→ <https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html>
- American Society of Addiction Medicine (ASAM): Supporting Access to Telehealth for Addiction Services: Regulatory Overview and General Practice Considerations  
→ <https://www.asam.org/Quality-Science/covid-19-coronavirus/access-to-telehealth>
- Pennsylvania Medical Society: Telemedicine Policies for Pennsylvania Insurers  
→ <https://www.pamedsoc.org/laws-advocacy/topics/articles/telemedicine-covid-19>

## **Withdrawal Management**

- SAMHSA: Managing the Treatment of Alcohol or Benzodiazepine Withdrawal during the COVID-19 Epidemic  
→ <https://www.samhsa.gov/sites/default/files/considerations-crisis-centers-clinicians-treatment-alcohol-benzodiazepine-withdrawal.pdf>