

## **Stocking and Dispensing Naloxone in Pennsylvania Frequently Asked Questions (FAQs)**

### **1. What is the Standing Order and is it legal?**

Under Pennsylvania Act 139 of 2014 (Act 139) (amending The Controlled Substance, Drug, Device and Cosmetic Act (35 P.S. §§ 780-101 et seq.)), health care professionals otherwise authorized to prescribe Naloxone are permitted to prescribe it via standing order to Eligible Persons. As a result of this action, Pennsylvania's Physician General issued a standing order for pharmacies to dispense naloxone in accordance with this order. (see link below)

### **2. Who authorized the Standing Order?**

Pennsylvania's Physician General: Dr. Rachel Levine  
(License: MD050119L, NPI: 1841218450)  
625 Forester Street, 5<sup>th</sup> Floor, Harrisburg, PA 17120  
(717) 787-9857

### **3. How long is the Standing Order applicable?**

Dr. Levine may withdraw and/or update the Standing Order at any time. She has actually already updated it one time. The order itself is good for four years and since it was issued on March 1, 2016, this means that on or before March 1, 2020, the order must be updated.

If Dr. Rachel Levine ceases to be the physician general, the standing order that she signed will no longer be in effect. Her successor could issue a replacement.

### **3. Where can I get a copy of the Standing Order?**

The Standing Order can be found on PPA's website at <http://www.papharmacists.com/page/CurrentHotTopics> and can also be found at the Dept. of Health's website at: <http://www.health.pa.gov/My%20Health/Diseases%20and%20Conditions/A-D/Documents/ACT%20139/Naloxone%20Standing%20Order%20DOH-General%20PublicMarch2016.pdf>

### **4. Which formulations of Naloxone are covered? And what are their differences?**

All state based insurances through Medicaid should cover all three formulations of naloxone, the atomizer, the intranasal and the auto injector. The auto injector usually requires a prior authorization.

The differences between the three formulations are:

- Atomizer – this is a multi-part device which requires the patient to assemble it prior to use. Once the three pieces are assembled, the device is inserted into the nasal passage and will form a spray into the nose.
- Intranasal – this device acts much like the atomizer but comes pre-assembled. All the patient need do is insert into the nose and spray the medication
- Auto injector – this device is a simple to use injection of naloxone. The device will speak to the patient and provide step-by-step instructions for use.

#### **5. Must my pharmacy stock/offer all covered formulations?**

No, you may stock whichever formulation you feel best fits the needs of your patients.

#### **6. Are insurers covering and how should Naloxone be billed?**

Naloxone should be dispensed under the standing order. Just write out a prescription as if receiving a phone order and place Dr. Rachel Levine's name as the prescribing physician.

#### **7. How do we handle dispensing and billing for a third party?**

Most Pennsylvania insurers including Pennsylvania Medicaid are allowing the billing in the name of a third party (such as parent or caregiver) when and if there is not coverage for the individual for whom the naloxone is intended. Because this may not be allowed by all insurers, we recommend specifically checking with any other specific payer that is not PA Medicaid to be sure this is acceptable.

#### **8. Can I simply dispense or is any training/counseling required?**

First of all, it is recommended that all pharmacists dispensing naloxone be fully trained in its use. The approved training by the PA Department of Health is referenced below. In addition, PPA has several CE programs around naloxone and related topics that can all enhance your knowledge. <http://www.papharmacists.com/page/SubstanceAbuseCE>

It is recommended that the recipient of naloxone (patient/loved one/guardian/caretaker/etc.) be provided with counseling and written information on how to recognize overdose, how to administer naloxone, etc. as outlined in Question 9. While the standing order does not require this nor does Act 139, in order to have the immunity protection that Act 139 offers, understanding appropriate response and having specific approved training for proper administration is emphasized. Many other states have some very specific requirements.

There is a free online training program approved by the PA Department of Health available online at: <http://getnaloxonenow.org/signup.aspx> that should be shared with all naloxone recipients in addition to basic counseling at the point of dispensing.

#### **9. What should be covered in any training/counseling?**

It is recommended that the patient be educated to the following, which is included in the approved training:

- Risk factors of opioid overdose and strategies to prevent overdose
- Signs and symptoms of opioid overdose
- How to administer naloxone based on the device dispensed
- Proper storage and expiration of dispensed naloxone
- Steps in responding to an overdose:
  - To contact 911 if naloxone is used
  - To remain with the patient until help arrives
  - How to place the patient into the safety position to reduce the risk of aspiration
  - A second dose may be needed if the patient overdosed on a high dose of long acting medication
- When used in good faith with evidence of having taken training, the patient and administrator are immune from criminal or civil prosecution.

**10. Are there any special record keeping requirements?**

No recording or reporting aspects other than normal dispensing records are required. However, best practices include adhering to the following:

Encouraging all naloxone recipients to keep a copy of the completion of approved training on hand as this will help provide legal and administrative immunity.

Encouraging all naloxone recipients to know the lot number and expiration date on the dispensed naloxone. Like any prescription medication, there is an expiration and there could be a recall and this is critical to know.

It is also recommended for pharmacies to follow up with those patients who received naloxone to determine if it was used, or if a new device is needed.

**11. Are there registry sites, where I should indicate that my pharmacy carries naloxone?**

Yes, currently PPA is aware of two places where this information is being collected. One is

OverdoseFree PA - <https://www.overdosefreepa.pitt.edu/naloxone-finder/>

And RecoveryAS - <https://recoveryaddictionservices.com/naloxone/>