



Last updated 2/16/23

Reopening Guidance from OASAS about Opioid Treatment Program Services during Ongoing COVID-19

Effective immediately, masking in OASAS programs is strongly recommended rather than required for all staff, visitors, and patients. All programs are responsible for creating policies and procedures regarding infection control in their own facilities. Programs may choose to go beyond this guidance and require masking should they choose to do so. OTPs should be aware of their county transmission levels and follow CDC guidance when transmission levels are substantial or high which includes masking for staff and visitors. If the county is not having substantial or high transmission levels, then masks are recommended for all staff, visitors, and patients, but are not required except in specific circumstances enumerated in the respective guidance documents for each type of program. See CDC information [here](#). See NYS DOH information [here](#).

OTPs should review [Guidance for Management in Opioid Treatment Programs During the COVID-19 Pandemic](#).

OTPs should review the most recent version of general programmatic reopening guidance from OASAS: <https://oasas.ny.gov/oasas-reopening-guidance> and should follow all requirements for outpatient programs, unless otherwise indicated by the following OTP-specific addenda:

- The federal regulatory blanket waiver remains in effect as long as the federal public health emergency (PHE) remains in effect. SAMHSA has put forth Proposed Rule changes for permanent take home dose flexibility, in addition to other flexibilities. See SAMHSA announcement [here](#). The federal PHE is scheduled to expire on 5/11/2023. See HHS announcement [here](#).
- **Current flexible take home schedules**, designated other arrangements, and medication deliveries, as applicable, should continue. Do not start to hold more in-person dosing visits and reduce take home schedules simply because the COVID-19 transmission levels in your county are improved; county transmission levels are very fluid and change quickly. ***OASAS strongly recommends that existing patient schedules in your clinics should remain in effect, unless a change/decrease in take home schedules is indicated clinically, on a case-by-case basis.*** OTPs should continue to consider all risks related to COVID-19 transmission, including increased risk to the patient with increased frequency of in-person clinic visits and the risk of travel to and from clinic sites. ***SAMHSA has extended methadone take home dose flexibility for one year after the federal PHE ends while it determines a more permanent solution (see SAMHSA Proposed Rule Changes above). See the SAMHSA announcement [here](#).***
- Face-to-face, in-person individual counseling services may occur, but telepractice counseling sessions should remain an option for patients. Instances where a face-to-face counseling visit would be indicated include if telepractice services are unavailable or the patient is in need of critical counseling services that must be done in-person (e.g., certain crisis management circumstances).
- When a patient does need to be seen for an in-person counseling visit, the following should be adhered to:

- To the extent possible, the patient should be seen only for an in-person visit on a day when they are coming in to be medicated/for a medication administration visit.
- If the patient is seen in person, physical distancing should be encouraged (greater than or equal to 6 feet) AND the staff member and patient are both strongly recommended to wear masks or face coverings. If a mask or face covering is worn, it should fit snugly and completely cover the nose and mouth*. Eye protection (i.e., goggles or a face shield that covers the front and sides of the face) is recommended for staff with all patient care encounters. See CDC guidance [here](#).
*See the CDC updated mask guidance and recommendations [here](#).
- OTPs should submit their applications for telepractice services as soon as possible if they haven't done so previously (please contact your OASAS Regional Office for the application). The emergency Telepractice Attestation approval is insufficient in providing long-term telehealth services and OASAS is strongly encouraging all providers, including OTPs, to apply for permanent approval if it is still outstanding for your program.
- Please note that while telephonic (audio only) buprenorphine initial (i.e., initiation) visits currently can occur, there is no authority yet for this practice to continue after the federal PHE is over.
 - OTPs may continue face-to-face, in-person group counseling indoors so long as the following conditions are met. Programs must continue to schedule and pre-screen all in-person group patient visits per previous outpatient guidance from OASAS (<https://oasas.ny.gov/covid-19-guidance-outpatient-programs>), strongly recommend that healthcare personnel and patients wear masks or face coverings, and encourage physical distancing. Eye protection (i.e., goggles or a face shield that covers the front and sides of the face) is recommended for staff with all patient care encounters. Indoor groups no longer need to be of limited duration (less than an hour) and physical distancing is encouraged. See NYS DOH guidance on recommended eye protection [here](#) and CDC guidance [here](#). *See the CDC updated mask guidance and recommendations [here](#).
 - Any program that has a significant number of confirmed COVID-19 cases among staff or patients on-site *that results in contact tracing activity among anyone who was on-site* could consider reverting to restricting all in-person group services except critical services that cannot be otherwise performed AND eliminate indoor in-person groups until there has not been a confirmed or suspected COVID-19 case among staff or patients on-site for at least 5 days. OTPs may contact the OASAS SOTA team and/or their respective OASAS Regional Office for guidance and technical assistance. See contact information below.
 - Please note that local health departments (LHD) and the NYS DOH have the ability to place further restrictions on in-person services at programs as the result of outbreak investigation activities. If this occurs, programs should immediately notify Lesley Puryear (Lesley.Puryear@oasas.ny.gov), Gregory James (Gregory.James@oasas.ny.gov), the SOTA mailbox (sota.mailbox@oasas.ny.gov), and the appropriate OASAS Regional Office. Please note that the LHD may not engage in contact tracing. Programs will be responsible for determining close contacts of cases identified in their programs to take necessary measures with respect to testing and isolation recommendations.
- Face-to-face medical services may be done as needed but only should occur when medically necessary. In most instances, procedures such as routine blood work and electrocardiograms are either not regulatorily required and/or may be unnecessary. However, the following specific services are OASAS and/or federal regulatory requirements and may occur on a routine basis:

- Toxicology testing should continue to be prioritized as medically necessary. The intent should NOT be to bring all patients in for usual, routine toxicology testing, but to consider the individual patient needs for toxicology testing. See OASAS guidance on toxicology [here](#).
 - Transmissible infection screening, including bringing patients in who would have been due for this screening since March 16, 2020.
 - Periodic assessments/physical examinations, as medically necessary (please note that the requirement for the annual physical exam was removed 3/27/19).
 - Any in-person medical services should be conducted in accordance with infection control guidance, including, but not limited to, pre-screening patients for COVID-19 risk and symptoms, appropriate use of personal protective equipment (PPE), encouraging physical distancing as much as possible, and strongly recommending the use of masks or face coverings for staff and patients*, and should occur only when a patient is already coming to the clinic for a medication dosing visit. Eye protection (i.e., goggles or a face shield that covers the front and sides of the face) is recommended for staff with all patient care encounters (e.g., medication administration, physical exams, etc.). See NYS DOH guidance on recommended eye protection [here](#) and CDC guidance [here](#). *See the CDC updated mask guidance and recommendations [here](#). Any program that has a significant number of confirmed COVID-19 cases among staff or patients on-site *that results in contact tracing activity among anyone who was on-site* could consider minimizing face-to-face, in-person medical services until there has not been a confirmed or suspected COVID-19 case among staff or patients on-site for at least 5 days. It is still recommended to utilize telepractice medical services as possible with the exception of methadone initial evaluations. OTPs may contact the OASAS SOTA team and/or their respective OASAS Regional Office for guidance and technical assistance. See contact information above.
 - Please note that local health departments (LHD) and the NYS DOH have the ability to place further restrictions on in-person services at programs as the result of outbreak investigation activities. If this occurs, programs should immediately notify Lesley Puryear (Lesley.Puryear@oasas.ny.gov), Gregory James (Gregory.James@oasas.ny.gov), the SOTA mailbox (sota.mailbox@oasas.ny.gov), and the appropriate OASAS Regional Office. Please note that the LHD may not engage in contact tracing. Programs will be responsible for determining close contacts of cases identified in their programs to take necessary measures with respect to testing and isolation.
- We are not authorizing any OTP requests for a permanent decrease in hours of operations at the present time. On a case-by-case basis, temporary requests to change existing hours of operations, based on need, should be directed to the OASAS SOTA Team (contact information above) and the OASAS Regional Office.
 - OASAS is not regularly authorizing OTP administrative discharges at this time; if there are any questions regarding a patient whom an OTP is considering for an administrative discharge, these should be directed to the OASAS SOTA Team (contact information above) before any administrative discharge decision is made.
 - OASAS is encouraging OTPs to submit mid-level practitioner exception requests, which would allow an OTP to use a mid-level practitioner to admit patients, as well as perform other physician-related services. Please contact Celine Ng (Celine.Ng@oasas.ny.gov) for information on the application process.

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