



Eric Holcomb, Governor  
State of Indiana

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**Division of Mental Health and Addiction**  
**Report to the Legislature Regarding Authorizations for Medication Exceptions**  
**April 1, 2022**

**Report Requirement**

IC 12-23-18-5 requires an annual report from DMHA regarding take-home medications administered by the Opioid Treatment Programs.

(c) Not later than April 1 of each year, the division shall report to the general assembly in electronic format under IC 5-14-6 the number of prior authorizations that were approved under subsection (a)(1)(A) in the previous year and the time frame for each approval.

**Exception Request Requirements**

Indiana currently has 22 Opioid Treatment Programs (OTPs) treating persons in recovery from an opioid addiction with Medicated Assisted Treatment (MAT). Individuals that are receiving MAT may be permitted to take home a limited supply of medication based on their time in treatment and adherence to state and federal guidelines. At times, an individual may have circumstances arise where they need to request take home medication when they are not eligible or request additional take home doses of more than fourteen (14) days. Exceptions for self-administered medication may be requested, consistent with the federal requirements in 42 CFR Part 8, and by Indiana's 440 IAC Article 10: Minimum Standards for the provision of services by Opioid Treatment Facilities and Programs; specifically, 440 IAC 10-4-26 Self-administered medication. The State of Indiana has a State Opioid Treatment Authority (SOTA) or Opioid Treatment Program Manager that reviews each request and approves or denies requests based on the following criteria:

Criteria for state opioid treatment authority when determining appropriateness of the take home medication request:

Any OTP request for an exception to the federal regulations for self-administered medications shall, at a minimum, include the following:

- (1) The dates and results of the patient's drug tests within the past three (3) months.
- (2) The patient's progress toward treatment plan goals.
- (3) Documentation, as appropriate, of a private physician's recommendation that the patient is unable to travel to the OTP due to a medical condition.
- (4) Documentation of employment travel hardship, as appropriate.
- (5) Documentation of other travel hardship, as appropriate.
- (6) For a temporary exception request due to travel, documentation that interim services are not available at the location to which the patient is temporarily traveling.



The data for calendar year 2021 is split between two categories: Extranet exceptions and COVID-19 exceptions. In March 2020, the Substance Abuse and Mental Health Services Administration (SAMHSA) instructed states to submit a plan for blanket exception requests to be reviewed and approved by the State Opioid Treatment Authority (SOTA) as opposed to going through the federal extranet system. All exception requests related to COVID-19 were to be submitted via the blanket exception request form and approved by the SOTA. All other exception requests were to be submitted via the extranet. Appendix A is Indiana’s plan approved by SAMHSA on March 20, 2020.

**Extranet Exceptions**

In 2021, 209 exception requests were submitted to the State of Indiana. Submissions came from 17 OTPs throughout Indiana regulated by DMHA. DMHA approved 160 exception requests, denied 47 exception requests and zero decisions not required by State due to the pandemic in 2021.

SAMHSA decisions are based on the decision made by the State Opioid Treatment Authority and are one of the following:

1. Approved by SAMHSA;
2. Denied by SAMHSA; and
3. Decision not required by SAMHSA

Decisions made by the State Opioid Treatment Authority supersede the decision made by SAMHSA.

**January 01, 2021 – December 31, 2021**

Number submitted		209	
OTPs submitting during time period		17	
Methadone as the treatment medication		200	96%
Buprenorphine as the treatment medication		13	6%
“Other” as the treatment medication		6	3%
Approved by SAMHSA		150	72%
Denied by SAMHSA		16	8%
Decision Not Required by SAMHSA		43	21%
Approved by State		160	77%
Denied by State		47	22%
Decision Not Required by State		0	0%

**New Reporting Criteria – HEA 1225 - 2021**

From July 01, 2021 – December 31, 2021, 142 exception requests were submitted to the State of Indiana. Submissions came from 15 OTPs throughout Indiana regulated by DMHA. DMHA approved 105 exception requests, denied 36 exception requests and zero decisions not required by State due to the pandemic in 2021.

1. 105 prior authorizations were approved.

- a. Time frame for approvals range from July 1, 2021 – December 31, 2021.
- b. Duration range of approved treatment was 1 day to 14 days.
- 2. No prior authorizations were revoked
- 3. No action was necessary to be taken.
- 4. No violations assessed.

**July 01, 2021 – December 31, 2021**

Number submitted		142	
OTPs submitting during time period		15	
Methadone as the treatment medication		141	99%
Buprenorphine as the treatment medication		10	7%
“Other” as the treatment medication		0	0%
Approved by SAMHSA		101	71%
Denied by SAMHSA		15	11%
Decision Not Required by SAMHSA		26	18%
Approved by State		105	74%
Denied by State		36	25%
Decision Not Required by State		0	0%

**COVID-19 Exceptions**

From January 01, 2021, to July 31, 2021, the following COVID-19 exception requests have been approved by DMHA:

MONTH	TOTAL APPROVED EXCEPTION REQUEST
January 2021	8012
February 2021	9495
March 2021	7950
April 2021	7166
May 2021	6460
June 2021	6405
July 2021	1762
<b>TOTAL</b>	<b>47,250</b>

Appendix A – Indiana’s Blanket Exception Request Plan Approved by SAMHSA

March 19, 2020

*Tracy Weymouth*

Director – Division of Pharmacologic Therapies (DPT)  
 Substance Abuse and Mental Health Services Administration (SAMHSA)  
 Center for Substance Abuse Treatment (CSAT)

Indiana is requesting the blanket exception offered by SAMHSA-DPT on March 16, 2020 regarding temporary allowance of the stipulations effective upon approval by SAMHSA and to a date determined to close by SAMHSA. The Indiana OTPs effected are:

<b>OTP No</b>	<b>DEA Number</b>	<b>Program Name</b>	<b>Address</b>	<b>City</b>	<b>State</b>	<b>Zip Code</b>
1817	RB0536426 / ZB0536423	Bowen Recovery Center	1415 Directors Row	Ft. Wayne	Indiana	46808
1048	RC0230285 / ZC02030285	Center for Behavior Health	3910 Lima Rd	Ft. Wayne	Indiana	46805
1522	RP0352245 / ZP0352245A	Community Medical Services-Marion	317 N. Norton Ave.	Marion	Indiana	46952
1078	RE0206703	East Indiana Treatment Center	816 Rudolph Way	Lawrence	Indiana	47205
1848	RN0189363 / ZN0189363	Edgewater New-Life	1110 W. 5th Avenue	Gary	Indiana	46204
1361	RE0201943	Evansville Treatment Center	945 Bond St.	Evansville	Indiana	46402
1228	RI0180202 / ZI0180202A	Indianapolis Treatment Center	2626 E. 46th St	Indianapolis	Indiana	46205
1804	RL0537172 / ZL0537172	Limestone Health	2100 Liberty Drive	Bloomington	Indiana	47403
1803	RL0536675 / ZL0536675	Limestone Health Lafayette	4705 Meijer Court	Lafayette	Indiana	47905
1895	RM0567288	Muncie Comprehensive Treatment Center	3640 Briarwood Lane	Muncie	Indiana	47304
1811	RV0537449 / ZV0537449	New Vista Outpatient Recovery Center	65 Airport Parkway	Greenwood	Indiana	46143

		Northwest Indiana					
1177	RH0382882 / ZH0382882	Treatment Center	8500 Broadway	Merrillville	Indiana	46410	
1847	RP0362311	Porter-Starke Recovery Center	701 Wall Street	Valparaiso	Indiana	46383	
1382	RR0231504	Richmond Treatment Center	4265 S. A Street	Richmond	Indiana	47374	
1845	PM0232328	Sandra Eskenazi Mental Health Center Narcotics Treatment Program	832 N. Meridian St.	Indianapolis	Indiana	46204	
1199	RM0245173 / ZM0245173	Semoran Treatment Center	8000 Melton Rd	Gary	Indiana	46403	
1076	RS0189325 / ZS0189325A	Southern Indiana Treatment Center	7509 Charlestown Pike	Charlestown	Indiana	47111	
1334	RV0211932	Victory Clinical Services II	4218 Western Ave	South Bend	Indiana	46619	
1816	RW0534657 / ZL0536675	WIN Recovery- Vigo Veteran's Administration	88 Wabash Court 1481 West 10th street- Room C-	Terre Haute	Indiana	47807	
IN10012M	PV0123517	OTP	1212	Indianapolis	Indiana	46202	

Blanket request for the above OTPs for patients deemed stable by the Medical Director utilizing the criteria found in 440 IAC 10-4-26, may receive *up to* 28 days of take-home doses of the patient's medication based on the identified category:

**CATEGORY 1:** Patients qualifying for at least one (1) – five (5) days of self-administered medication can receive up to fourteen (14) days of take-home medication.

**CATEGORY 2:** Patients qualifying for six (6) days of self-administered medication can receive up to twenty-eight (28) days of take-home medication.

**CATEGORY 3:** Patients grandfathered at two weeks of self-administered medication can receive up to twenty-eight (28) days of take-home medications.

**CATEGORY 4:** Patients that do not qualify for self-administered medication due to positive drug test for THC will be considered for up to six (6) days of take-home medications.

**CATEGORY 5:** Patients with documentation from a physician that they are unable to travel to the OTP due to a medical condition will be considered regardless of positive drug screen. This includes patients with compromised immune systems due to testing positive for a communicable disease (HIV, Hepatitis, TB, Etc.), cancer, pregnancy, diabetes or patients 60 years of age or above will be considered for six (6) to twenty-eight (28) days of take-home medications.

**CATEGORY 6:** Women who are pregnant will be considered for fourteen (14) to twenty-eight (28) days of take-home medications.

**CATEGORY 7:** Patients who are quarantined awaiting medical results for confirmation of Negative/Positive test for COVID19 or are self-quarantined due to exhibiting symptoms will be considered for fourteen (14) to twenty-eight (28) days take-home medications.

**CATEGORY 8:** Patients with medical documentation of a positive test for COVID – 19 will be considered for fourteen (14) up to twenty-eight (28) days of take home medications.

**CATEGORY 9:** Patients who are otherwise not eligible for take home medication due to non-compliance with program and self-administration requirements IAC 10-4-26 (not attending groups, continue to provide illicit drug screens, are new to treatment etc.) may be put on staggered take homes to reduce the traffic in the OTP. At the discretion of the medical director, they may receive from one (1) day of take-home medications up to two days (2) of take-home medication. If they are successful for a period of thirty (30) days, they can move up to three (3) days of self –administered medications. OTPs should schedule patients for dosing, when possible, to limit wait time in the clinic.

**CATEGORY 10:** Patients who do not currently qualify for take-home medication but are compliant with treatment guidelines (providing licit drug screens and working on treatment goals) can receive up to three (3) days of self-administered medication. And if they are successful can move up to six (6) days after 30 days.

The rationale must be documented in the client’s file. This allowance will remain in effect only until SAMHSA and DHS remove this emergency authorization.

Please address questions to Gus Habig [William.Habig@fssa.IN.gov](mailto:William.Habig@fssa.IN.gov), Legislative Director for FSSA.