

DO I NEED TO SUBMIT AN EXCEPTION REQUEST?

Yes – Who do I need to submit to?

Federal CSAT SMA-168 Exception Online Portal	State DHCS 1834 Form
<ul style="list-style-type: none"> » Chain of custody (COC) <u>only</u> when the medication is provided to a 3rd party/facility (e.g., jail, prison, hospital, long-term care facility (LTC)) and the medication not administered/dispensed directly to the patient by NTP staff. » Need to exceed the take-home methadone supply limit based off time-in treatment: <ul style="list-style-type: none"> ○ During the first 14 days of treatment limited to 7 days of take-home methadone doses. ○ From 15 days of treatment to 30 days of treatment limited to 14 days of take-home ○ From 31 days of treatment limited to 28 take-home methadone doses. » Emergency closures. 	<ul style="list-style-type: none"> » Discharge exception for maintenance treatment (>30 missed days, want to avoid discharge). » Program unable to offer 45 mins of counseling per month (e.g., patient hospitalization, incarceration, residential). » Guest/courtesy dosing >30 days for patients not incarcerated, hospitalized, or in residential or LTC facility. » Unable to complete 8 urinary drug screens (UDS)/year due to an extenuating circumstance. » Saliva drug screen for patients physically unable to provide UDS. » Initial physical exam within 14 days (extenuating circumstances only e.g., hospitalization, incarceration, natural disaster).

No

No Exception Submission Needed

- » Split dosing in 2 or more doses.
- » Admission criteria: Removed 1-year OUD history requirement and the requirement that people <18 years of age must have completed 2 unsuccessful episodes of treatment.
- » Minor consent: NTPs may admit patients 16 years of age or older without parent or guardian consent.
- » Take-home methadone doses within time in treatment supply limits.
- » Guest/courtesy dosing <30 days
- » Guest/courtesy dosing >30 days for patients incarcerated, hospitalized, or in residential or LTC facility.
- » Counseling: If counseling is offered, but patient declines counseling.
- » Discharge for detoxification treatment >7 days: NTP may discharge but is not required to.
- » Physician extenders: Exception no longer required, duties must be outlined in the NTP's protocols.
- » State and Federal Holidays
- » COC is required anytime medication for opioid use disorder is removed from the NTP as take-home medication and delivered to the patient. However, if the medication is delivered/administered directly to the patient by the NTP staff member, only COC is required and an exception is not needed.

Notes:

1. [BHIN 25-008 & 42 CFR Part 8](#): Updated state guidance and federal laws.
2. [OTP Extranet-Login](#): No PHI (names/DOB) allowed; must include patient ID, dates, and justification.
3. [Narcotic Treatment Program \(NTP\) Exception Request \(DHCS 1834\)](#): No PHI (names/DOB) allowed; must include patient ID, dates, and justification.
4. **Chain of Custody (COC)**: *Is required* anytime medication for opioid use disorder is being handled or stored by a 3rd party (e.g., jail, prison, residential program, LTC) or medication for opioid use disorder is removed from the NTP by NTP staff as take-home medication and delivered to the patient. For example, COC is required when the NTP delivers patient medication as take-home doses to another facility (e.g., jail, residential program, LTC) or to the patient directly. Another example is if non NTP facility staff pick up take-home medication doses from the NTP through a chain-of-custody arrangement for secure storage and observed administration in the facility by appropriate non NTP facility staff. Please note: these scenarios all require COC, however a CSAT exception is only required if the medication is handled or stored by a 3rd party. No exception is needed when the medication is transported and administered by the NTP staff directly to the patient.
5. **Guest/Courtesy Dosing**: Is when the patient temporarily receives medication for opioid use disorder from a NTP in which the patient is not registered with. Such circumstances include, but are not limited to, travel for work or family events, temporary relocation, temporary closure of the NTP of record, incarceration, or hospitalization. NTPs must adhere to Guest/Courtesy Dosing requirements outlined in [BHIN 25-008 - Narcotic Treatment Programs Regulation Changes; Attachment 1, Section 10295](#).
6. A CSAT Exception is *not* needed for [Federal Holidays](#) and a DHCS 1834 State Only Exception form is *not* needed for State Holidays as specified in [BHIN 25-008 - Narcotic Treatment Programs Regulation Changes; Attachment 1, Section 10380](#). If a NTP needs to exchange a State Holiday with other days of special local or ethnic significance on a one-for-one basis with the State recognized holidays the NTP must submit an [Application for Protocol Amendment \(DHCS 5135\)](#) to dhcsntp@dhcs.ca.gov.

Technical Assistance:

1. Please fill out all required sections of the form as missing information will delay a response to your exception request.
2. Please do not cut and paste the same language from prior exception requests as this causes inaccurate information being reported on the exception such as the wrong type of facility the patient is residing in (e.g., residential, LTC, correctional facility) in lieu of the actual facility the patient is in, incorrect date of admission, incorrect justifications that are not specific to the patient.