Vermont Pharmacist Prescribing Protocol - Opioid Antagonists

Background

A pharmacist may prescribe, order, or administer opioid antagonists in a manner consistent with a valid State protocol approved by the Commissioner of Health, after consultation with the Director of Professional Regulation and the Board of Pharmacy (BOP). 26 V.S.A. § 2023(b)(2)(A)(i).

Pharmacists who independently prescribe opioid antagonists must follow this protocol. When prescribing per this protocol, the pharmacist is the prescriber-of-record.

Definitions

"Opioid antagonist" means naloxone or other product approved by the U.S. Food and Drug Administration for emergency treatment of known or suspected opioid overdose, as manifested by respiratory and/or central nervous system depression.

"Recipient" means the person to whom an opioid antagonist is being supplied. The recipient might be someone other than the person for whom the use of the opioid antagonist is intended.

General Considerations

Prescribing an opioid antagonist under this protocol requires the pharmacist to:

- 1. Have training and education in that area sufficient to perform the duties involved.
- 2. Document prescribing, including notifying the patient's primary care provider within 5 business days.
- 3. Keep a written copy of the protocol at each location from where prescriptions are issued for, or dispensing of, an opioid antagonist occurs.
- 4. Provide a copy of the protocol available upon the request of an inspector.

Pharmacists and pharmacies are encouraged to post a notice or to otherwise alert customers that pharmacists may prescribe and dispense opioid antagonists.

Procedures

When an individual requests an opioid antagonist, or when a pharmacist in his or her professional judgement offers to prescribe an opioid antagonist to an individual, the pharmacist shall complete the following steps:

- 1. Screen for the following (in the primary spoken language of the recipient, upon request and when possible):
 - a. Does the recipient understand that opioid antagonists can only be used for opioid overdoses and cannot be used for other drug overdoses?
 - b. Does the person to whom the opioid antagonist would be administered have a known hypersensitivity to the drug? (an answer of yes precludes prescribing and dispensing)
 - c. Provide training in opioid overdose prevention and recognition, the administration of the opioid antagonist, and the appropriate response to an opioid overdose, including the need to pursue immediate, follow-up treatment (e.g., calling 911)

- 2. When an opioid antagonist is dispensed, the prescribing pharmacist shall counsel the recipient on the product dispensed and provide appropriate written information, to include:
 - a. administration
 - i. an opioid antagonist may be administered in cases of unknown or mixed substance overdoses
 - ii. an opioid antagonist should be administered if the patient's sensitivity to the drug is unknown
 - b. effectiveness
 - c. adverse effects
 - d. storage conditions and shelf-life
 - e. a recommendation that 911 be called if the opioid antagonist is administered
 - f. any other information deemed necessary in the professional judgment of the pharmacist

A prescribing pharmacist, dispensing an opioid antagonist pursuant to this protocol, shall not permit the recipient to waive the provision of the written information or the counseling required by this protocol.

The pharmacist should provide information, whether written or oral, to the recipient in the primary language of the recipient.

Authorized Drugs

- Prescribing and dispensing done pursuant to this protocol is limited to FDA-approved opioid antagonist products. A pharmacist may not prescribe or dispense a compounded version of an opioid antagonist
 - a. A pharmacist may also recommend optional items when appropriate, such as alcohol pads, rescue breathing masks, and protective gloves
- 2. Selection of a product for which a prescription will be issued shall involve collection of information from the recipient regarding:
 - a. products available
 - b. recipient or patient preference
 - c. limitations in ability to administer a particular dosage form (i.e. injection vs. nasal spray)
 - d. insurance coverage and other cost factors
 - e. Any other pertinent factor

Prescribing Records

The pharmacist must generate a written or electronic prescription for any opioid antagonist dispensed. The prescription must include all the information required by Administrative Rule 10.1. The prescription must be processed in the same manner that any other prescription is processed, pursuant to the applicable statutes and rules for the dispensing of prescription drugs. The prescription shall be kept on file and maintained for a minimum of three years, as required by the rules of the Vermont BOP. Pharmacists are reminded to adhere to record-keeping requirements for prescriptions paid for by Medicare and Medicaid, which may differ from those required by BOP.

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APPROVED:

Commissioner, Vermont Department of Health

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Director, Office of Professional Regulation