



To: All Medicaid Provider Types, Medicaid Managed Care Organizations, Optum Behavioral Health ASO

From: Robert R. Neall, Health Secretary 

Re: COVID-19 - #9 - Signature-less Deliveries of Pharmaceuticals

Issued Date: March 31, 2020

Effective Date: March 31, 2020

NOTE: Please ensure appropriate staff members in your organization are informed of the contents of this guidance document.

Background

On March 5, 2020, Governor Lawrence J. Hogan, Jr., declared a state of emergency due to disease (“COVID-19”) caused by the novel coronavirus. An outbreak of disease due to COVID-19 first occurred in the Hubei Province, China, in late 2019, and has currently been detected in more than 109 countries, including the United States. COVID-19 is a severe respiratory disease, resulting in illness or death, caused by person-to-person spread of the novel coronavirus.

The measures outlined in this document are restricted to use during the emergency declared by Governor Hogan to deal with the threat of COVID-19 and will expire immediately at the end of the declared emergency or as revised by additional orders such that the Secretary’s authority to issue this guidance no longer exists.

Signature-less Deliveries of Pharmaceuticals

The Secretary of Health and Human Services, Alex Azar, wrote to Governor Hogan on March 24, 2020, and requested that Governor Hogan take immediate action in a number of areas. Specifically, Mr. Azar requested action to modify any laws or regulations that require a written, signature confirming deliveries of pharmaceuticals and, instead, permit signature-less deliveries. The purpose of the action is to help prevent contact between those effecting pharmaceutical deliveries and those receiving them.

During the state of emergency, the Maryland Medicaid Program will not require pharmacies to maintain for their records the signature of the individual to whom a prescription is delivered. Instead of a signature, pharmacies must use other means to confirm delivery, such as a phone call, text message, or email. These confirmations are required to be documented and retrievable upon audit. Please Note: signatures are required for controlled dangerous substances.

HealthChoice managed care organizations should implement a similar policy during the period of the state of emergency.