



LICENSING ALERT 01-2018

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December 24, 2018

Division of Drug and Alcohol Program Licensure
Licensing Alert 01-2018

Clarification Regarding Verification of Patient Identity in Licensed Narcotic Treatment Programs

The purpose of this Alert is to clarify the acceptable means of verifying the identity of individuals seeking enrollment and being served in a licensed Narcotic Treatment Program (NTP).

28 Pa. Code § 715.9. Intake.

(a) Prior to administration of an agent, a narcotic treatment program shall screen each individual to determine eligibility for admission. The narcotic treatment program shall:

- (1) Verify that the individual has reached 18 years of age.
- (2) Verify the individual's identity, including name, address, date of birth, emergency contact and other identifying data.

The following items are acceptable for verifying a perspective patient's identity at intake:

- Any valid or expired national federal, state or local issued photo identification cards.
- A valid or expired passport.
- A valid or expired student photo ID, which contains the patient's Date of Birth (DOB).
- A photo identification card issued by another licensed NTP.
- A valid or expired check cashing photo identification card.
- A birth certificate and Social Security card.
- A copy of a photo of the patient and a letter directly from another licensed NTP in which the patient was previously enrolled.
- A copy of a photo from a medical record with verification of date of birth.
- A state or federal correctional facility identification card.

In the event an individual is unable to obtain any of the items previously listed, the NTP may utilize either method below. An exception from DDAP is not required.

- An NTP may accept any valid or expired photo identification card issued by a national, federal, state or local governmental agency without the patient's DOB in conjunction with a document that contains the patient's DOB (e.g., birth certificate, marriage certificate, a formal signed letter from an agency that provides/provided services to the patient, etc.). Facilities are required to keep copies of any documents used to verify a patient's identity in the patient's record.
- With the written consent from the patient, the NTP may contact the patient's insurer in efforts to verify identification. Information obtained from the insurer must be documented and include the following:
 - Name
 - DOB
 - Gender
 - Race
 - Ethnicity (If available)

The NTP must maintain within the patient's record, the following:

- Documentation regarding the establishment of the identification from the insurer.
- A signed attestation by the patient stating the information he/she provided regarding their identification is accurate.

28 Pa. Code § 715.13. Patient Identification.

(a) A narcotic treatment program shall use a system for patient identification for the purpose of verifying the correct identity of a patient prior to administration of an agent.

(b) A narcotic treatment program shall maintain onsite a photograph of each patient which includes the patient's name and birth date. The narcotic treatment program shall update the photograph every 3 years.

Additionally, as outlined in 28 Pa. Code § 715.13, the NTP must use a system for patient identification for the purpose of verifying the correct identity of a patient prior to dosing and maintain a photo of each patient which includes the patient's name and birth date (must be updated every three years).

Questions regarding this Alert can be submitted to RA-licensuredivision@pa.gov or phone [717-783-8675](tel:717-783-8675).