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TO: Local Health Departments and Regional Offices of the Illinois Department of Public Health, Infection Control Professionals, Infectious Disease Physicians, Hospital Emergency Departments

- FROM: Damon T. Arnold, M.D., M.P.H., Director
- DATE: May 1, 2009

SUBJECT: Guidelines on Local Health Department Distribution of Strategic National Stockpile (SNS) Antivirals

This memo provides general guidance to Local Health Departments on the distribution of Strategic National Stockpile (SNS) antivirals for the treatment of H1N1 Influenza.

IDPH is strongly advising physicians not to over-prescribe antivirals. Antivirals may be prescribed by a physician to patients, and dispensed under the provisions of the Illinois Pharmacy Practice Act. Current law does not permit the dispensing of the antivirals by way of a standing order. While a standing order may be issued, a patient-specific prescription is required to dispense the antivirals to the patients. Patient-specific prescription labels must also be affixed to the medication being dispensed. The Emergency Use Authorization (EUA) from the FDA does not change Illinois requirements for prescribing or labeling. Dispensing requires complying with Illinois labeling requirements.

Local Health Departments with Clinic Operations:

• Following established clinic procedures, physicians may prescribe these antivirals to patients based on IDPH "Interim Guidelines on Use of Antivirals, Including Strategic National Stockpile (SNS) Antivirals", disseminated April 30, 2009 via the Health Alert Network. As these Guidelines are updated, they will be disseminated via the same mechanism.

All Local Health Departments should work with their Federally Qualified Health Centers (FQHCs) and Community Clinics. If these providers have patients who need treatment based on IDPH Guidelines and cannot obtain antivirals through their own means, Local Health Departments may provide these entities with supplies of SNS antivirals, as needed and as available. Those entities receiving the supplies need to meet the prescription and dispensing requirements under the Illinois Pharmacy Practice Act (prescription and labeling).

LHDs and hospitals should account for all SNS supplies using their own internal procedures for accountability. In the event a state or federal audit occurs, it is the responsibility of the LHD to provide documentation of how SNS supplies were distributed. Local health departments that provide SNS supplies to FQHCs and Community Clinics should ensure that those entities follow similar procedures.

Local Health Departments are not authorized to provide private pharmacies with SNS antivirals for their dispensing.

Attached, please find two (2) sets of Facts Sheets for Health Care Providers and Patients/Parents, one for Tamiflu and one for Relenza. These are facts sheets that have been provided by the Food and Drug Administration (FDA) and authorized by the Centers for Disease Control and Prevention (CDC) specific to the Emergency Use Authorization (EUA) for these antivirals in this public health emergency. Upon distribution of any SNS antivirals, Local Health Departments should provide the appropriate fact sheets to patients and health care providers.