

Massachusetts Department of Mental Health (DMH)
Clinical Guidance for Clinicians and Pharmacists Regarding Clozapine Use
During the COVID-19 Public Health Emergency

TO: DMH Community Services and Inpatient Services

FROM: Kathy Sanders MD; State Medical Director

The current COVID-19 public health emergency (PHE) poses particular access problems for patients treated with clozapine due to registry-based and proscriptive “no blood, no drug” rules for prescribing and dispensing this essential psychiatric medications. At this point of the PHE with social distancing the order of the day, the risk of obtaining blood work may outweigh the benefit from monitoring the absolute neutrophil count (ANC) according to the FDA-mandated monitoring schedule – or practically not possible at all. On March 22, 2020, the FDA has thus offered guidance with regards to access to medications covered by certain Risk Evaluation and Mitigation Strategy (REMS)-required testing during this PHE, including laboratory testing of ANC for clozapine.¹ In their guidance, the FDA states the following:

*For drugs subject to these REMS with laboratory testing [...], health care providers prescribing and/or dispensing these drugs should consider whether there are compelling reasons not to complete these tests [...] during the PHE, and **use their best medical judgment in weighing the benefits and risks of continuing treatment in the absence of laboratory testing [...]**. Health care providers should also communicate with their patients regarding these judgments, including the risks associated with it.*

The Department of Mental Health of Massachusetts fully supports the FDA statement regarding the relaxation of ANC monitoring for the duration of this PHE and offers the following *clinical* guidance for clinicians and pharmacists which is in accordance with the spirit of the FDA guidance:

- Clinicians may determine that obtaining mandated clozapine blood work (i.e., absolute neutrophil count or ANC) during the COVID-10 pandemic is only possible at unacceptably high risk for patients or providers – or practically not possible. Patients may for example be in isolation, in quarantine or at high risk for mortality were they get infected with COVID-19 while traveling to a clinic or laboratory for blood work.
- When determining whether or not to waive ANC testing, clinicians should take into account the duration of clozapine treatment. Long-term clozapine patients (12 months or longer) in particular are at very low risk for clozapine-associated severe neutropenia, with the peak incidence occurring at one month of clozapine exposure and a decline to negligible risk levels after one year of treatment.²
- Pharmacists, in collaboration with the patient’s physician and using their professional judgment should dispense the most appropriate number of pills without a current ANC on file. **[MA Board of Pharmacy COVID-19 FAQs 03/19/2020]** For many patients on long-term treatment, this may

simply be an additional 30-day supply of clozapine, assuming an ANC can be obtained in a month. There may, however, be situations where a 60-day or 90-day supply may be prudent, depending on how the pandemic evolves over the next few months. For patients newly started on clozapine, more cautious dispensation of clozapine would be prudent.

- Pharmacists and clinicians may determine that having a one-month emergency supply on hand by be prudent.
- The decision to continue clozapine treatment in the absence of scheduled ANC monitoring should be made in collaboration with patients and family members, explaining the rationale for proceeding without ANC monitoring and weighing the risks and benefits of this approach.
- NOTE: Patients who develop a sore throat and fever, among other symptoms, during a period without ANC monitoring should be medically assessed for clozapine-associated neutropenia, including obtaining an ANC. They should not simply be isolated at home, for example, assuming that they may have a viral illness like COVID-19.
- Pharmacists are encouraged to dispense additional clozapine per guidance from **MassHealth Pharmacy Program March 20, 2020 Pharmacy Facts**.
- Group homes should allow the storage of clozapine pills for more than 30 days, consistent with DPH guidance.

References

¹<https://www.fda.gov/regulatory-information/search-fda-guidance-documents/policy-certain-rem-requirements-during-covid-19-public-health-emergency-guidance-industry-and>

² Myles N, Myles H, Xia S, et al. Meta-analysis examining the epidemiology of clozapine-associated neutropenia. *Acta Psychiatrica Scandinavica* 2018; 138(2): 101-9