

## **American Epilepsy Society Comment on Therapeutic Substitution of Medications**

**April 3, 2020**

Several governors have issued or are considering emergency proclamations that permit a pharmacist to make therapeutic substitution of medications without physician approval, should medication shortages occur.

The American Epilepsy Society (AES) strongly encourages pharmacists to make every effort to keep patients with epilepsy on their current regimen of antiseizure medications (ASM). Pharmacists should consult with the patient's prescriber/healthcare provider prior to making any therapeutic substitution of ASM.

Generic substitution of ASM has been shown to be safe and is appropriate for patients with epilepsy. While the AES appreciates efforts to ensure patients receive medications during the COVID-19 crisis, there are important concerns for individuals with epilepsy that make therapeutic substitutions of ASM less than optimal and possibly harmful. For many patients with epilepsy, it is very difficult to balance seizure control with adverse effects and drug-drug interactions of ASM. Additionally, ASM have a wide range of mechanisms of action, pharmacokinetics, adverse effect profiles, and drug interactions. While almost all ASM have similar FDA approved indications, individual patients with the same seizure classification may have very different clinical responses to the same medication. In addition, many patients require multiple adjustments of ASM, particularly when given in combination, to achieve optimal outcomes.

AES shared this comment with the following organizations with requests for consideration of dissemination to members: American College of Clinical Pharmacy (ACCP); American Pharmacists Association (AphA); American Society of Consultant Pharmacists (ASCP); American Society of Health-System Pharmacists (ASHP); College of Psychiatric and Neurologic Pharmacists (CPNP); National Alliance of State Pharmacy Associations (NASPA); National Association of Boards of Pharmacy (NABP); National Community Pharmacists Association (NCPA); National Pharmaceutical Association (NPhA); and Pediatric Pharmacy Association (PPA).