



STATE OF MARYLAND

DHMH

Maryland Department of Health and Mental Hygiene
Behavioral Health Administration • Spring Grove Hospital Center • Dix Building
55 Wade Avenue • Catonsville, Maryland 21228

*Larry Hogan, Governor – Boyd K. Rutherford, Lt. Governor – Van T. Mitchell, Secretary
Barbara J. Bazron, Ph.D., Executive Director*

MEMORANDUM

To: Prescribers and Pharmacists

From: Barbara J. Bazron, Ph.D., Howard Haft, M.D.

Date: September 30, 2016

Re: Prescription Drug Monitoring (PDMP) Mandatory Registration

The Department of Health and Mental Hygiene is providing an update to the requirement that healthcare practitioners who prescribe CDS be registered with the PDMP in order to obtain a new or renewal Controlled Dangerous Substance (CDS) license, starting October 1, 2016.

HB 437 2016, effective October 1, 2016, requires all CDS prescribers and pharmacists to be registered with the PDMP by July 1, 2017. Section 1 of this bill also linked the PDMP registration with a new or renewal CDS license such that a CDS license would not be issued after October 1, 2016 unless the applicant had completed PDMP registration. DHMH has determined that it is in the best interests of prescribers and the community to delay the link between the CDS license and PDMP registration until July 1, 2017. Approval of applications for a new or renewal CDS license received before July 1, 2017 will not be contingent upon completion of the PDMP registration.

The requirement that all prescribers and pharmacists be registered with the PDMP by July 1, 2017 remains in effect.

Attached is an updated Fact Sheet explaining the requirements of the new law.



Version III



IMPORTANT Information Regarding **Maryland Prescription Drug Monitoring Program**

New law requires providers to REGISTER with and USE PDMP

The **Maryland Prescription Drug Monitoring Program (PDMP)** was created to support providers and their patients in the safe and effective use of prescription drugs. The PDMP is part of Maryland's response to the ***epidemic of opioid addiction and overdose deaths***.

Maryland PDMP Facts

- Authorized by law in 2011
- Maryland Department of Health and Mental Hygiene (DHMH) program
- Contains data on Rx controlled dangerous substances (CDS) dispensed to patients in Maryland
- Providers get free, online access through Chesapeake Regional Information System for our Patients (CRISP) at: www.crisphealth.org

What is CRISP?

- State-designated health information exchange (HIE) serving Maryland and the District of Columbia.
- Electronic system connecting all 46 acute care hospitals in Maryland
- Web-based portal gives providers secure access to patient PDMP, hospital and other clinical data



Legal Changes Affecting Providers


On April 26, 2016, Governor Hogan signed into law HB 437 which includes the following legal changes:

1. Mandatory PDMP Registration for CDS Prescribers & Pharmacists

Pharmacists: Licensed pharmacists in Maryland must be registered with the PDMP by **July 1, 2017**.

Prescribers: Practitioners authorized to prescribe CDS in Maryland must be registered with the PDMP by **July 1, 2017**. *This applies to physicians, physician assistants, nurse practitioners, nurse midwives, dentists, podiatrists and veterinarians. This mandate does not apply to the following categories of nurses: RNs, CNAs, and LPNs.*

Please note: a second provision in the law will, in the future, require PDMP registration prior to obtaining a new or renewal CDS prescribing permit from the Office of Controlled Substances Administration (formerly Division of Drug Control) after a positive determination is made by the DHMH Secretary, expected to occur July 1, 2017; that provision of the law is NOT in effect at this time.



REGISTER NOW with the PDMP through CRISP at www.crisphealth.org. Look for the PDMP 'Register' button on the homepage or on the PDMP Services page.

For registration help, call CRISP Support at: 1-877-952-7477.

2. Mandatory PDMP Use by CDS Prescribers & Pharmacists

Beginning **July 1, 2018:**

- **Prescribers must**, with some exceptions, query and review their patient's PDMP data prior to initially prescribing an opioid or benzodiazepine **AND** at least every 90 days thereafter as long as the course of treatment continues to include prescribing an opioid or benzodiazepine. Prescribers must also document PDMP data query and review in the patient's medical record.
- **Pharmacists must** query and review patient PDMP data prior to dispensing **ANY** CDS drug if they have a reasonable belief that a patient is seeking the drug for any purpose other than the treatment of an existing medical condition.

Information regarding Mandatory Use is available on the DHMH PDMP website. DHMH will provide additional information and reminders closer to but before the implementation date.

3. CDS Prescribers & Pharmacists May Delegate PDMP Data Access

Prescribers and pharmacists may delegate healthcare staff to obtain CRISP user accounts and query PDMP data on their behalf. Delegates may include both licensed practitioners without prescriptive authority and non-licensed clinical staff that are employed by, or under contract with, the same professional practice or facility where the prescriber or pharmacist practices.

To Learn More

Visit the **DHMH PDMP website** for updated information, important compliance dates and Frequently Asked Questions: <http://bha.dhmh.maryland.gov/PDMP>.

For more information about the opioid addiction and overdose epidemic in Maryland and what healthcare providers can do to help, visit http://bha.dhmh.maryland.gov/OVERDOSE_PREVENTION/.