



Improving Access to Patient Medication History

Dispenser Reporting of Noncontrolled Prescription Drugs

Maryland law¹ aims to enable access to comprehensive medication histories to support authorized individuals involved in the treatment and care coordination of patients. Dispensers of noncontrolled prescription drugs (non-CDS)² – including certain pharmacies and health care practitioners – will be required to submit non-CDS dispense information to the State-Designated Health Information Exchange (CRISP), which also serves as a Health Data Utility for the State.³

FREQUENTLY ASKED QUESTIONS

Why does access to non-CDS dispense information matter?

Medication discrepancies and adverse drug events pose significant challenges to patient safety and the delivery of high-quality care. Adverse drug events alone cause more than 1.5 million emergency department visits annually across the country.⁴ The Maryland Prescription Drug Monitoring Program (PDMP) makes available dispense information for controlled dangerous substances (CDS) to assist providers in care delivery and public health and safety authorities with reducing the misuse, abuse, and diversion of prescription drugs. Expanding access to a patient's complete medication history with information on non-CDS dispenses supports care delivery and public health goals.

How do dispensers report non-CDS dispense information?

To minimize burden and duplication, processes for non-CDS reporting will be similar to existing technical requirements for reporting to the Maryland PDMP.⁵ Dispensers who already report to the PDMP will be able to submit one file with CDS and non-CDS dispense information. The Maryland Health Care Commission (MHCC) will publish a *Noncontrolled Prescription Drugs Dispenser Data Submission Manual* with more information and guidelines on non-CDS reporting timeframes and frequency, electronic specifications, and technology failure protocols; a preliminary draft was developed with input from stakeholders, including health care providers, pharmacists, and CRISP.

When do dispensers start reporting?

Dispenser reporting of non-CDS dispense information to CRISP is anticipated to begin around September 1, 2025 (pending finalized regulations).⁶ Dispensers are encouraged to begin submitting earlier.

What is required to get started?

Submitting non-CDS dispense data

CRISP has contracted with Leap Orbit to securely collect and store dispense information using RxGov, a web-based program that does not require any special hardware or software. Dispensers that do not already submit dispense data to the Maryland PDMP must register with RxGov [here](#).

Accessing data using CRISP

CRISP offers a variety of tools and services to meet the needs of providers, patients, and State agencies. Some services require an organization to enter into a signed agreement with CRISP. Click [here](#) for more information or contact the CRISP Customer Care team by phone at **1.877.952.7477** or email support@crisphealth.org. Pharmacies should include in the subject of their email “Pharmacy Onboarding for Non-CDS.”



For questions about the regulatory requirements for non-CDS, please contact MHCC at mhcc.noncds@maryland.gov.

About MHCC

The Maryland Health Care Commission is an independent regulatory agency – learn more by visiting mhcc.maryland.gov or searching MHCCMD on Facebook or X (Twitter).

¹ Chapter 296 (House Bill 1127), Public Health - State Designated Exchange - Health Data Utility (2022). Available at: mgaleg.maryland.gov/2022RS/chapters_noln/Ch_296_hb1127T.pdf.

² Non-CDS prescription drugs are those that are not classified as controlled dangerous substances (CDS) by the State Office of Controlled Substances Administration and the federal Drug Enforcement Administration.

³ Maryland law established the Health Data Utility to support electronic exchange of clinical, non-clinical, administrative, and public health data. More information is available at: mhcc.maryland.gov/mhcc/pages/hit/hit_hdu/hit_hdu.aspx.

⁴ Centers for Disease Control and Prevention, *FastStats: Medication Safety Data.*, April 2024. Available at: www.cdc.gov/medication-safety/data-research/facts-stats/index.html#:~:text=Importance.and%20almost%20500%2C000%20require%20hospitalization.

⁵ This includes use of standards published by ASAP (American Society for Automation in Pharmacy).

⁶ COMAR 10.25.18.14 (proposed).

