



# Stakeholder Working Session

Noncontrolled Dispenser Reporting – Chapter 296 (House Bill 1127), *Public Health – State Designated Exchange – Health Data Utility* (2022)

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Informal Draft Amendments to COMAR 10.25.18, *Health Information Exchanges: Privacy and Security of Protected Health Information*

JULY 23, 2024



## **Chapter 296 (House Bill 1127), *Public Health – State Designated Exchange – Health Data Utility (2022)***

- ▶ Requires dispensers to report data to the State-Designated Health Information Exchange (CRISP) after dispensing a noncontrolled (“non-CDS”) prescription drug
- ▶ The prescription information must be submitted:
  - By electronic means
  - Without unduly increasing the workload or expense on dispensers
  - In a manner that minimizes burden and duplication by being as compatible as possible with existing federal standards for data submission practices, including technology software of dispensers
- ▶ CRISP shall make prescription information available for:
  - Treatment and care coordination of a patient
  - Public health purposes



# Goals For This Working Session

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- ▶ Discuss select comments pertaining to the implementation of a non-CDS data repository of the amendments to COMAR 10.25.18, *Health Information Exchanges: Privacy and Security of Protected Health Information*
- ▶ Consider additional amendments or clarifications, as needed, and strategies to support implementation and compliance

*Note: additional working sessions will be held in July; more information is available [here](#)*



# Regulations

# Next Steps



- ▶ Consider feedback on comments to the informal draft amendments
- ▶ Seek additional input from stakeholders on potential changes to the informal draft amendments
- ▶ Aim to publish the draft regulations in the Maryland Register in the fall of 2024
- ▶ Convene one additional working session:
  - **July 30<sup>th</sup> 1:00-2:30pm ET:** Reporting of electronic health care transactions; [Chapter 790/791](#), *Public Health – State Designated Exchange – Clinical Information* (2021)

# Dispenser Technical Guidance



- ▶ The regulations require MHCC to develop a *Noncontrolled Prescription Drugs Dispensers Data Submission Manual* (manual)
  - Over the last year, MHCC worked with CRISP, dispensers, and other stakeholders to prepare an informal draft manual, taking into consideration existing requirements relevant to the Maryland Prescription Drug Monitoring Program
- ▶ The MHCC anticipates releasing the draft manual for review in the coming weeks
- ▶ The manual provides technical guidance to dispensers on the submission of non-CDS dispense information to CRISP's technology vendor; the manual table of contents include:
  - I. Background
  - II. Data Collection and Reporting Requirements
  - III. Submitter Account
  - IV. Data Submission Methods
  - V. Validation Rules
  - VI. View and Update Submitted Reports
  - VII. Zero Reports
  - VIII. Assistance and Support
  - Appendix A: Data Standard and Reporting
  - Appendix B: Zero Report Specifications

# Thank you

For questions, please contact Anna Gribble at  
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