

Noncontrolled Prescription Drug Reporting

Frequently Asked Questions

August 22, 2025



The Maryland Health Care Commission (MHCC) has compiled answers to frequently asked questions (FAQ) as it relates to reporting noncontrolled prescription drug (or non-CDS) dispense information to the State-Designated Health Information Exchange (CRISP). Maryland law¹ requires dispensers to submit non-CDS dispense information to CRISP to support treatment and care coordination and public health purposes. This FAQ serves as a resource for stakeholders, including pharmacists, pharmacies, and dispensing prescribers, and includes references to the relevant provisions in statute, regulation, and/or the *Noncontrolled Prescription Drugs Dispenser Data Submission Manual*.

The information that follows does not constitute legal advice and should not be considered a substitute for a thorough review of Maryland law (Health General §19-145, Annotated Code of Maryland) and supporting regulations (COMAR 10.25.18).

Definitions

Who is considered a “dispenser”?

Individuals authorized by law to dispense non-CDS drugs to a patient, or a patient’s agent in Maryland, including authorized nonresident pharmacies are required to report non-CDS dispense information to CRISP. This includes pharmacies with a license from the Maryland Board of Pharmacy and dispensing prescribers with a dispensing permit from their respective Maryland health licensing board. Mail-order pharmacies with a license from the Maryland Board of Pharmacy must submit dispense information for non-CDS medications dispensed into Maryland.

The following are exempt from the definition of “dispenser”:

- A licensed hospital pharmacy that only dispenses a monitored prescription drug for direct administration to an inpatient of the hospital
- An opioid treatment services program, as defined by COMAR 10.47.07.02
- A veterinarian licensed in Maryland

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.

- A pharmacy issued a waiver permit under COMAR 10.34.17.03 that provides pharmaceutical specialty services exclusively to persons living in assisted living facilities, comprehensive care facilities, or development disabilities facilities
- A pharmacy issued a waiver by the Department under COMAR 10.47.07.03G from reporting dispensing to hospice patients

See [COMAR 10.25.18.02B\(24\)](#)

What is a “dispense”?

“Dispense” has the meaning stated in [Health Occupations Article, §12–101, Annotated Code of Maryland](#).

“Dispense” or “dispensing” means the procedure which results in the receipt of a prescription or nonprescription drug or device by a patient or the patient’s agent and which entails:

1. Interpretation of an authorized prescriber’s prescription for a drug or device;
2. Selection and labeling of the drug or device prescribed pursuant to that prescription; and
3. Measuring and packaging of the prescribed drug or device in accordance with State and federal laws.

See [COMAR 10.25.18.02B\(23\)](#) and [Health Occupations Article, §12–101\(j\), Annotated Code of Maryland](#)

What are noncontrolled prescription drugs?

A noncontrolled prescription drug means a prescription drug (including compounded drugs) that is not a controlled dangerous substance designated under [Criminal Law Article, Title 5, Subtitle 4, Annotated Code of Maryland](#). Non-CDS drugs may be dispensed only on the prescription of an authorized health practitioner.

See [Health General Article, §19-145\(a\)\(3\), Annotated Code of Maryland](#) and [Health General Article, §21-201\(e\), Annotated Code of Maryland](#) and [Health General Article, §21-220\(a\), Annotated Code of Maryland](#) and [Noncontrolled Prescription Drugs Dispenser Data Submission Manual, Appendix A](#).

SCOPE

What information must be submitted to CRISP?

Non-CDS drugs dispensed in or into Maryland must be submitted to CRISP. The following information is not required to be submitted to CRISP:

- Prescription drug samples offered to patients
- Medications that are sold without a prescription (e.g., over-the-counter drugs); please note that drugs that could be sold over the counter but are dispensed with a prescription must be reported

- Controlled dangerous substances (CDS) designated under [Criminal Law Article, Title 5, Subtitle 4, Annotated Code of Maryland](#) required to be reported to the Maryland Prescription Drug Monitoring Program (PDMP)
- Information related to the direct administration of medications to patients
- Medical devices
- Clinical services

See [COMAR 10.25.18.02B\(54\)](#) and [COMAR 10.25.18.02B\(23\)](#) and [Health Occupations Article, §12-102\(d\), Annotated Code of Maryland](#)

Do veterinarians need to submit non-CDS dispense information?

Veterinarians are not required to submit non-CDS dispense information to CRISP.

See [COMAR 10.25.18.02B\(24\)](#)

Do medications dispensed for pets need to be reported?

Dispensers other than veterinarians, such as community pharmacies, who dispense prescriptions for pets are required to submit dispense information to CRISP. Dispensers other than veterinarians who exclusively dispense prescriptions for pets should consider requesting a waiver from reporting.

See [COMAR 10.25.18.02B\(24\)](#)

Do hospitals need to submit non-CDS dispense information?

Hospitals with an outpatient/retail pharmacy and hospitals that dispense medications at discharge, such as “bridge” medications, are required to submit non-CDS dispense information to CRISP. Hospitals are not required to report medications directly administered to patients in the inpatient setting.

See [COMAR 10.25.18.02B\(24\)](#)

Timelines

When does non-CDS reporting begin?

By September 1, 2025, dispensers must begin submitting non-CDS dispense information to CRISP, consistent with the specifications in the [Noncontrolled Prescription Drugs Dispenser Data Submission Manual](#). For questions and technical support, contact CRISP at support@crisphealth.org or Leap Orbit at rxgovsupport@leaporbit.com.

See [COMAR 10.25.18.13F](#)

How often are dispensers required to submit non-CDS dispense information?

Dispensers must minimally submit non-CDS dispense information to CRISP daily and no later than the end of the next business day after the prescription is sold. Daily reporting includes the submission of a zero report on days when no prescriptions are dispensed.

See [Noncontrolled Prescription Drugs Dispenser Data Submission Manual](#), page 5

Data Submission

What is the required format to submit non-CDS dispense information?

All dispense information must be submitted using a transmission standard developed by the American Society for Automation in Pharmacy (ASAP). Dispensers must minimally use ASAP version 4.2B or may use the newer 5.0 version. The *Noncontrolled Prescription Drugs Dispenser Data Submission Manual* provides detailed technical guidance, including a list of required fields based on ASAP version 4.2B.

How should medications dispensed for pets be submitted?

Species code PAT20 is required. If the species code indicates '02' for 'veterinary patient', no other validation rules will be enforced.

See [Noncontrolled Prescription Drugs Dispenser Data Submission Manual](#), page 20

Are there different reporting requirements for non-CDS dispense information compared to CDS?

Some fields in ASAP version 4.2B have different validation requirements for non-CDS dispenses. Validation rules for non-CDS can be found in Appendix A of the [Noncontrolled Prescription Drugs Dispenser Data Submission Manual](#). Fields with a validation status different than the PDMP are highlighted in yellow.

See [Noncontrolled Prescription Drugs Dispenser Data Submission Manual](#), page 35

What is the process for dispensers to submit zero reports?

Zero reports can be submitted via SFTP or manually in the RxGov portal. For submitting zero reports via SFTP, refer to Appendix B of the [Noncontrolled Prescription Drugs Dispenser Data Submission Manual](#). For submitting zero reports manually in RxGov portal, refer to Section VII, "Zero Reports," on page 31-32 of the [Noncontrolled Prescription Drugs Dispenser Data Submission Manual](#).

Dispensers must submit a non-CDS zero report even if CDS dispense information is reported to the Maryland PDMP. Please refer to the dispenser manual for more information.

See [Noncontrolled Prescription Drugs Dispenser Data Submission Manual](#), pages 31 and 32

Dispenser Waiver of Compliance

Who can request a waiver from submitting non-CDS dispense information?

Dispensers seeking a waiver from non-CDS reporting must minimally meet one of the following conditions:

- Economic hardship
- Technology limitations that are not reasonably within the dispenser's control
- Dispensing less than 100 non-CDS drugs annually
- Other circumstances determined by the Commission to be extenuating

See [COMAR 10.25.18.13F](#)

What is the process for dispensers to request a waiver?

A waiver request form is available [here](#) and must be completed and submitted to MHCC for consideration. A waiver request may be submitted on behalf of multiple pharmacies or dispensing prescribers. Respondents who plan to submit a request on behalf of pharmacies with multiple locations or multiple dispensing prescribers are required to complete a supplemental form [here](#) and email it to mhcc.noncds@maryland.gov. The MHCC will review waiver requests and provide a response within 45 days.

See [COMAR 10.25.18.13F](#)

Additional Resources

[Webinar: Blueprint for Dispenser Reporting of Non-CDS Dispenses in Maryland \(July 23, 2025\)](#)

[Webinar: Non-CDS Data Submission \(July 29, 2025\)](#)

[MHCC Non-CDS webpage](#)

[CRISP Non-CDS webpage](#)



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 that promotes informed decision-making, improves access, and enhances accountability in the State's health care system – learn more by visiting mhcc.maryland.gov or searching MHCCMD on Facebook or X (Twitter).