



Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Dennis R. Schrader, Secretary

March 3, 2022

The Honorable Shane E. Pendergrass
Chair, House Health and Government Operations Committee
House Office Building, Room 241
6 Bladen St., Annapolis, MD 21401

**RE: HB 1111- Prescription Drug Monitoring Program –Prescribers of Opioids -
Notification Requirement - Letter of Information**

Dear Chair Pendergrass and Committee Members:

The Maryland Department of Health (MDH) respectfully submits this Letter of Information for HB 1111 – Prescription Drug Monitoring Program – Prescribers of Opioids - Notification Requirement. This bill requires prescribers who prescribe or dispense an opioid prescription of 50 morphine milligram equivalents (MME) or more to notify the Prescription Drug Monitoring Program (PDMP) they have: 1) received education on risks associated with opioid use, 2) is aware that an opioid overdose reversal drug is available, and 3) prescribed or dispensed an opioid overdose reversal drug.

PDMP currently receives data from dispensers at the point of dispensing the prescribed medication, not from prescribers. There is no existing functionality in the PDMP to receive information from healthcare providers at the point of writing a prescription. The bill will require the PDMP to create an electronic mechanism to allow prescribers to report information and create a mechanism to ensure compliance with this data sharing. This will require significant technological build with CRISP. The PDMP will need to hire additional staff to work closely with CRISP for implementation and ongoing operations.

Additionally, as drafted, HB1111 does not indicate how the PDMP should respond if prescribers do not notify the PDMP or how the PDMP should respond if prescribers indicate that they have not received education or are unaware of the opioid overdose reversal drug. Furthermore, MDH notes that the PDMP only receives reporting on controlled substances dispensed in or into Maryland. The PDMP does not have the ability to track prescribers who write an opioid prescription of 50 MME or more if the prescription is never filled by the patient.

Currently, prescribers who are applying for a new or renewal registration to dispense or prescribe controlled dangerous substances must attest to the completion of two hours of continuing education in prescribing or dispensing of controlled substances, a very similar requirement to the reporting requirement proposed in HB1111. Maryland regulations (COMAR 10.13.03) support

the co-prescribing of naloxone for patients at elevated risk of experiencing or witnessing an overdose. The PDMP has shared this information with providers on the PDMP website and through provider educational initiatives.

If you would like to discuss this further, please contact Heather Shek, Director, Office of Governmental Affairs at (410) 260-3190 or heather.shek@maryland.gov.

Sincerely,

A handwritten signature in cursive script that reads "Dennis R. Schrader".

Dennis R. Schrader
Secretary