



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

March 4, 2021

The Honorable Shane E. Pendergrass
Chair, Health and Government Operations Committee
Room 241, House Office Building
Annapolis, MD 21401-1991

RE: HB1125–Prescription Drug Monitoring Program – Notification Requirement – Letter of Information

Dear Chair Pendergrass and Committee Members:

The Maryland Department of Health (MDH) respectfully submits this Letter of Information for HB1125 – Prescription Drug Monitoring Program – Notification Requirement. This bill requires prescribers who prescribe or dispense an opioid prescription of 50 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, HB1125 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. It is also unclear if prescribers are required to notify the PDMP only once, or once per patient, or once any time they write an opioid prescription of 50 MME or more.

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 HB1125. Maryland regulations (COMAR 10.13.03) recently promulgated supported 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.

I hope this information is useful. If you have questions or need more information about this subject, please do not hesitate to contact me at (410) 260-3190 or webster.ye@maryland.gov or Director of Governmental Affairs, Heather Shek, at heather.shek@maryland.gov or the same number.

Sincerely,

A handwritten signature in blue ink, appearing to read "Webster Ye".

Webster Ye
Assistant Secretary for Health Policy