

Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Robert R. Neall, Secretary

October 14, 2020

Office of Provider Engagement and Regulation Office of the Prescription Drug Monitoring Program Susannah Beckerman, MA, Deputy Director 55 Wade Ave, Voc Rehab Bldg Catonsville, MD 21228

RE: PDMP Registration Requirements and PDMP Access for Veterinarians with CDS Licenses

Dear Maryland Veterinarians,

Thank you for your continued efforts to safely prescribe and dispense controlled dangerous substances (CDS) in Maryland while protecting and promoting animal health and welfare. This letters seeks to provide guidance regarding the registration and use of PDMP by veterinarians.

Registration

Under HB437 (Chapter 147, 2016), all CDS prescribers and pharmacists licensed to dispense CDS in Maryland must be registered with the PDMP by July 1, 2017. Effective February 15, 2018, a prescriber must be PDMP-registered before being issued a new or renewal CDS Permit by the Office of Controlled Substances Administration (OCSA). Providers only need to register once for the PDMP and registration is free.

Veterinarians who wish to prescribe CDS for an animal in Maryland are required by law to be registered with the PDMP. Veterinarians need to demonstrate that they are PDMP-registered when they apply for a new or renewal CDS Permit. If a veterinarian does not have a CDS registration they are not subject to the PDMP registration use mandate.

If you are not registered, you can initiate registration from the PDMP Webpage here: https://crisphealth.org/services/prescription-drug-monitoring-program-pdmp/pdmp-registration/

If you are unsure if you are registered you can confirm your registration status and obtain your Confirmation Code with one simple step, navigate to the PDMP auto-registration front page (https://crisphealth.force.com/crispregkeydata) then select your health profession. Enter your license and DEA numbers. Finally, enter the red characters displayed in the gray window and hit "Submit."

If you are registered, the system will display your PDMP Registration Confirmation Code and your email account on record and will stop you from re-registering. You will also be emailed a

copy of your Confirmation Code. If you are **not** registered, the system will take you to the next step of registration, confirming your name.

PDMP Access

While veterinarians are required to be PDMP-registered in order to obtain a new or renewed CDS Permit, the PDMP statute does not grant veterinarians the authority to review PDMP data. Therefore, veterinarians are not subject to the use mandate, nor are they allowed to log into CRISP and query PDMP data even outside the use mandate. Per Health General §21-2A-06, prescription monitoring data are confidential and privileged and may be disclosed to prescribers or dispensers (or their delegates) in connection with the medical care of a patient, which does not include veterinarian care of animal. Veterinarians do not have a legally authorized use case to access the PDMP. Veterinarians cannot check the PDMP for pet owners because they do not have a clinical relationship with the owner, they only have a clinical relationship with the pet.

For more information about PDMP registration or CDS prescribing or dispensing, please visit MarylandPDMP.org or contact the PDMP or OCSA.

Prescription Drug Monitoring Program (PDMP)

Email: mdh.pdmp@maryland.gov Phone: 410-402-8686 Office of Controlled Substances Administration (OCSA)

Email: Maryland.OCSA@maryland.gov Phone: 410-764-2890

Sincerely,

Susannah Beckerman, MA

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Deputy Director

Office of Provider Engagement and Regulation