



MARYLAND Department of Health

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

NOTICE: Changes in Maryland PDMP Dispenser Reporting Requirements

*The purpose of this notice is to inform dispensers of controlled dangerous substance (CDS) prescriptions about reporting requirement changes to the Maryland PDMP. Dispensers must begin reporting data to a new data collection software product, RxGov no later than **June 1, 2019**. Dispensers are required to report data every 24 hours, including zero reports, effective **July 1, 2019**.*

Summary of Changes

- Maryland PDMP has engaged a new data collection vendor, RxGov, which is **now** accepting data submissions. Dispensers, or their authorized data submitter, must begin reporting data by **June 1, 2019**.
- Maryland statute governing the PDMP was amended (HB437/Chapter 147, 2016) to change the dispenser reporting frequency. All non-exempt dispensers of CDS medications are required to report applicable dispenses every 24 hours to the Maryland PDMP, including submission of zero reports if no dispensing occurs. Previously, reporting was required within 3 business days of the dispense. ‘Zero reports’ will be required on any day that the dispenser does not dispense a CDS prescription, regardless of whether or not the dispensing facility is open for business that day. Monitoring for compliance with the daily reporting requirement will begin **July 1, 2019**.
- Both dispensers and known data submitters reporting on behalf of dispensers are being contacted about these changes; however, it is the duty of the dispenser to ensure any vendor or outside entity submitting data on its behalf is compliant.

Action Required for Data Collection Vendor Change

- **Timeline:** Reporting through RxGov may begin **now** and must be initiated no later than **June 1, 2019**.
- **Uploader Account:** Every data submitter account currently registered with the existing RxSentry platform will be migrated to the new vendor, RxGov and you will only need to create a new password. If you fall under the reporting requirement but are not currently uploading to RxSentry, you will need to create a new account with RxGov.
- **Uploading Instructions:** Full instructions for migrating to RxGov, including a Data Submitter Guide, are available on the ‘Dispenser Reporting’ section of the Maryland PDMP website, www.MarylandPDMP.org
- **For technical assistance:** contact RxGov’s help desk at 1-844-767-4767 or rxgovsupport@egov.com

Action Required for Daily Reporting Compliance

- **Timeline:** You may choose to adjust your reporting frequency now through the existing vendor product, RxSentry, or initiate daily reporting through RxGov **no later than June 1, 2019**.
- **Requirement:** All non-exempt dispensers of CDS medications should begin reporting all CDS dispenses daily (at least once every 24 hours) to the Maryland PDMP. Reporting exemptions are listed on our website (www.MarylandPDMP.org); please navigate to the ‘Dispenser Reporting’ tab. If you qualify for a reporting exemption and have not already done so, please complete an exemption attestation form, found on the ‘Forms’ tab.
- **Exemptions:** Previously approved exemption attestations are still valid, as long as attested exemption status has not changed. If at any time a dispenser’s attested exemption status changes, the dispenser must notify the Maryland PDMP and immediately begin reporting all CDS dispenses.
- **Zero Reporting:** Ensure zero reports are reported on a daily basis for any given day in which the dispenser does not dispense. Zero reports should not be submitted as timeframes. A separate zero report must be submitted for each particular day the dispenser was closed. Blank dispensing reports are not an acceptable alternative. Full instructions will be included in the Data Submitter Guide.

Policy questions should be directed to the Maryland PDMP at mdh.pdmp@maryland.gov or 410-402-8686, directly to PDMP Data Quality Specialist Katherine Johnson at Katherine.johnson@maryland.gov, or visit our website: www.MarylandPDMP.org