



PDMP FAQs

General Information

- 1. Forgot Your Password?**
 - a. Click on the icon “Forgot My Password” underneath the login and follow the onscreen prompts. If you have an account an email will be sent to the given address.

- 2. I haven’t logged in to my account in over 30 days and my account is locked.**
 - a. You are required to log into your account every 90 days, after that your account will be locked. You will need to contact CRISP Support at 1-877-952-7477 to unlock your account.

- 3. Which prescription drugs are monitored?**
 - a. The PDMP monitors only the prescribing and dispensing of drugs that contain Schedules II through V controlled dangerous substances (CDS). State and federal law define CDS as substances that have abuse potential. Drugs listed in CDS Schedules II, III, IV and V also have accepted medical uses. This includes opioid pain relievers like oxycodone (OxyContin, Percocet, Percodan, Roxicet), hydrocodone (Vicodin, Lortab) and methadone prescribed for pain; anti-anxiety and sedative medications like alprazolam (Xanax) and diazepam (Valium); and stimulants like dextroamphetamine-amphetamine (Adderall) and methylphenidate (Ritalin). The complete list of CDS in Maryland is found in Criminal Law Article, Title 5, Subtitle 4, Annotated Code of Maryland.

- 4. What prescription information is reported to the PDMP?**
 - a. For each prescribed CDS drug that is dispensed in Maryland, the dispenser must report information for the:
 - Drug (Rx number, date Rx issued and filled, refill information, National Drug Code, quantity dispensed, days’ supply)
 - Patient for whom the drug was prescribed (name, address, gender, date of birth, ID number);
 - Prescriber (DEA registration number); and
 - Dispenser (DEA registration number).

- 5. How often is prescription information reported?**
 - a. CDS dispensers must report prescription information to the PDMP no later than three (3) business days after the drug was dispensed. All non-exempt dispensers of CS medications are required to report applicable dispenses every



24 hours to the Maryland PDMP, including submission of zero reports if no dispensing occurs. 'Zero reports' will be required on any day that the dispenser does not dispense a CS prescription, regardless of whether or not the dispensing facility is open for business that day.

6. Why can't I find any prescription information on my patient?

- a. The patient may not have any filled CDS prescriptions. If you believe this is in error, please contact the PDMP at mdh.pdmp@maryland.gov or call 410- 402-8686 during regular business hours.

7. Errors or missing PDMP data?

- a. If you have any data quality or completeness related questions based on your review of PDMP data in CRISP / PDMP Search or as a result of an investigative data request, PDMP staff are available to assist. Issues may include, but are not limited to:
 - Missing prescription records for a patient (e.g. you know the prescription was dispensed but it is not showing up in the patient's profile)
 - Errors in a prescription record for a patient (e.g. you see a valid prescription record but know that certain variables for that prescription are incorrectly displayed)
 - Prescriptions falsely attributed to a patient (e.g. a prescription that you have reason to believe was not dispensed is showing up for a patient)
 - Multiple prescriptions missing for a known prescriber or dispenser (e.g. you know prescriptions were written by a prescriber or dispensed by a pharmacy, but they are not showing up across multiple patients)

To obtain assistance with resolving any data quality or completeness question, please contact mdh.pdmp@maryland.gov or 410-402-8686.

8. Who is responsible for oversight and operation of the PDMP?

- a. The Maryland Department of Health (MDH), Behavioral Health Administration (BHA) is responsible for oversight of the PDMP. MDH receives ongoing advice and consultation from the Advisory Board on Prescription Drug Monitoring on program design, implementation and development.

MDH has partnered with Chesapeake Regional Information System for our Patients (CRISP) and Leap Orbit to provide information technology services for the PDMP. CRISP is a 501(c)3 not-for-profit membership corporation that has been designated by the Maryland Health Care Commission as the statewide health information exchange (HIE). Since its inception, CRISP has been fostering the adoption and innovative use of health information technology across Maryland. CRISP has successfully established connectivity to all of the acute care hospitals in the State and provides access to a substantial amount of



clinical data for healthcare providers. CRISP has contracted with Leap Orbit to support PDMP-specific IT services. Leap Orbit's RxGov® is a web-based program that facilitates the collection, analysis, and disclosure of prescription information.

9. How is the confidentiality of prescription information protected?

- a. State law holds that prescription data are confidential, privileged, not subject to discovery, subpoena, or other means of legal compulsion in civil litigation and are not public records. To deter misuse, unlawful access to or use of prescription data is punishable by up to one year in prison and a \$10,000 fine. The PDMP logs system access and data requests submitted by all registered users and audits are conducted to detect potential violations. Individuals who believe that their prescription information may have been accessed or used inappropriately should contact the PDMP.

10. What is the legal authority for the PDMP?

- a. The PDMP is authorized under Health-General Article, Section 21-2A, Annotated Code of Maryland (Chapter 166, 2011). PDMP regulations can be found under Code of Maryland Regulations (COMAR) 10.47.07.

11. As a patient, can I opt out of having my data in the PDMP?

- a. No. The patient opt-out available for other CRISP clinical information does not apply to provider access to patient prescription records collected by the PDMP. State law requires that providers have access to PDMP data.

12. Can out of state pharmacists have access to the Maryland PDMP?

- a. Pharmacists who are employed outside of Maryland, but who possess a Maryland pharmacist's license and dispense to Maryland residents are allowed to have access to the PDMP. The mandated registration by July 1, 2017, also applies to this group.

Pharmacists who are employed outside of Maryland that do not have a Maryland license and do not dispense prescriptions to Maryland residents cannot have access to the PDMP. Instead, they can access Maryland PDMP through their state's PDMP solution, provided Maryland is participating in interstate data through the PMP InterConnect hub with that state.

13. Can out of state prescribers have access to the Maryland PDMP?

- a. Prescribers in states bordering Maryland (Delaware, DC, West Virginia, Northern Virginia, and Southern Pennsylvania) can have access to the Maryland PDMP (within reason). If you are a provider practicing outside of these states, you should contact your home State to determine if they participate in 'interstate data sharing' through the PMP InterConnect data sharing hub. Maryland currently shares with limited states, but will continue adding new connections.



14. What can I do if I suspect my DEA number is being used to forge prescriptions?

If providers suspect that someone is forging their prescriptions, then they should contact the dispensing pharmacy to verify the credentials on the original prescription. If a forgery is suspected, contact the appropriate authorities who can conduct a formal investigation.

Maryland MDH Office of Controlled Substance Administration (formerly Division of Drug Control)

Email: maryland.ocsa@maryland.gov

Phone: 410-764-2890

Website: <https://health.maryland.gov/ocsa/>

US Drug Enforcement Administration

Washington District Office (for Montgomery and Prince George's Counties): 202-305-8800

Office of Diversion Control

Baltimore District Office (for the rest of the state): 410- 244-3587

Maryland Board of Pharmacy

Email: mdh.mdbop@maryland.gov

Phone: 410- 764-4755

Website: <https://health.maryland.gov/pharmacy/>

Online form for reporting stolen prescriptions:

<https://health.maryland.gov/pharmacy/Pages/missing-rx-form.aspx>

Local law enforcement: Your local police department or county sheriff's office may conduct pharmaceutical diversion investigations.



PDMP FAQs

Registration

1. **How can I receive confirmation that I have registered for PDMP?**
 - a. Once all steps required for registration are completed, a confirmation is sent to the email you provided during the registration process. You may also check or confirm PDMP registration status here: <https://crisphealth.force.com/crispregkeydata>
2. **I am new to practicing or prescribing controlled dangerous substances in the state and do not have a DEA or CDS permit yet. How do I register?**
 - a. If you do not have a DEA or CDS permit yet, please go to the Standard Registration process. In the DEA field, please enter “No DEA” and in the CDS field, enter “No CDS”. You will get a registration confirmation, but will not be issued a username and password to view the PDMP data until you provide CRISP with your active DEA and CDS. You may contact CRISP Support at support@crisphealth.org or 877-952-7477 to provide proof of DEA and Maryland CDS permit numbers
3. **If I obtain a new CDS permit, do I need to register with my new CDS?**
 - a. When you obtain a new CDS permit, please email or call CRISP support to ensure we have your updated information. Obtaining a new CDS does not affect your PDMP Registration status, you only need to register once to have met the registration mandate. However, if we do not have all your active CDS on file, that could delay your CDS renewal in the future.
4. **When trying to renew my CDS permit online, I get a message that I am not PDMP registered. What should I do?**
 - a. You may have registered under a different CDS number and we need to update your records to reflect all active CDS. Please contact CRISP support to confirm or update your current CDS information.
5. **I am applying for a CDS permit and need to provide a PDMP Registration Confirmation Code. How can I find this information?**
 - a. When you completed registration, a confirmation code was sent to the email you provided as part of the registration process. If you cannot locate that email, you may confirm PDMP registration status here: <https://crisphealth.force.com/crispregkeydata> . This will display your confirmation code and re-send the code via email.
6. **Are CDS prescribers working in other states (not in MD) required to register for PDMP?**
 - a. No, only prescribers who are Maryland-licensed health care professionals authorized by law to prescribe Schedule II-V controlled dangerous substances (CDS) are required to register under the PDMP Registration Mandate.



- 7. What should I do if when I tried to register, I got an error message that said, “The user already exists, use another Email.”?**
 - a. This may have occurred if you attempted to start a new registration or check your registration status through the “Standard Registration” workflow. Please check for a Confirmation Code at <https://crisphhealth.force.com/crispregkeydata>, which will confirm your registration status or allow you to continue and complete registration. You may also contact CRISP support for assistance.

- 8. What is the ‘Organization’ field and why do I need to affiliate with one?**
 - a. Understanding which organization you are affiliated with will facilitate the process to establish and maintain the delegator/delegate relationships. If you would like to also access the clinical data (not just PDMP) in the CRISP Portal, an organization is needed for CRISP to carry out the onboarding steps required under our Participation Agreement and Policies & Procedures. CRISP is happy to discuss other services with you and your organization that could assist workflows, transitions of care, and care management. If you are only registering to meet the mandate and do not require PDMP access, please enter “No Organization” for the Organization field.

- 9. I work at multiple locations, which organization would I register under?**
 - a. Please register under your primary work location (or simply select one if equal time is spent across multiple organizations).
 - b. If you are only registering to meet the mandate and do not need to access PDMP data, simply enter “No Organization” for this field.

- 10. If I am not affiliated with any organization, which organization would I register under?**
 - a. When you register and are asked for your Organization, please register under the "No Organization" option. You will be able to type in and select the "No Organization" organization name when searching through the account options.

- 11. I am already registered for PDMP but I am terminating my job at my current organization. What do I do?**
 - a. If the email account that you use for CRISP becomes inactivated (job change or for any other reason), please contact CRISP to ensure we have an updated an e-mail address. The email address should be one that only you can access. Please contact CRISP support to update your email and new place of employment to ensure your access to PDMP remains active.

- 12. How do I register as a delegate?**
 - a. Delegates must register with CRISP and be verified by an organizational point of contact. Delegates must register through the Standard Registration Process during which they must identify a Delegator, who is a PDMP-registered



Prescriber or Pharmacist. CRISP contacts the Delegator via email for confirmation prior to finalizing the relationship and authorizing the Delegate access to PDMP data.

- b. Delegates and Delegators also have the option of contacting the CRISP Support Team to initiate a new Delegate/Delegator relationship; CRISP will verify the relationship with the Delegator before finalizing.

13. I am a Resident Physician and prescribe under my hospital's Organizational DEA and CDS number. Am I required to register with the PDMP? How do I register?

- a. Yes, all prescribers who are Maryland-licensed health care professionals authorized by law to prescribe controlled dangerous substances (CDS) are required to register.
- b. Resident physicians without their own individual DEA and CDS numbers can register with their organizational DEA + DEA Suffix (provided by their healthcare organization) by going to the Standard Registration process. If you have your own individual DEA and CDS, you can utilize the Auto-Registration process.
- c. If you are a physician resident or intern without any prescriptive authority, you do not fall under the PDMP registration mandate. You can register for access as a Delegate. You will be delegated PDMP access by a supervising prescriber already registered with PDMP

14. I registered as a Physician Resident but am now a licensed Physician. Do I need to register again?

- a. If you completed Registration you are considered registered for the PDMP Mandate. You must contact CRISP to provide your Maryland License number once you receive it so we can identify you are no longer in Residency. We require current License information in order to confirm your registration to OCSA. Failure to provide this information may cause delays in obtaining your CDS permit.

15. If I am a pharmacist and report data to the PDMP on behalf of my pharmacy, does that mean I'm PDMP Registered?

- a. You may be reporting prescription dispensing data to the PDMP on behalf of the pharmacy at which you work. This is an important role and ensures your pharmacy is in compliance with the requirement that any dispenser of controlled dangerous substance (CDS) prescriptions must report these records to the PDMP.

However, separate from the requirement on a dispensing entity to report data to the PDMP, there is a legal requirement for all pharmacists licensed in Maryland to be registered with the PDMP as a clinical user. You must individually register in order to become compliant and to get access to the data.



Please visit the PDMP Registration page (<https://crisphealth.org/services/prescription-drug-monitoring-program-pdmp/pdmp-registration/>) and complete the Standard Registration.

16. If I am not PDMP Registered, and prefer to surrender my CDS Registration/Permit instead of register what do I need to do?

- a. If you know or discover that you are not PDMP Registered, but you are in possession of a Maryland CDS Registration (Permit) issued by the Office of Controlled Substances Administration (OCSA), you may choose to surrender your CDS permit. As a CDS Registration holder, you need to fill out the Surrender Letter to discontinue to prescribe, store or dispense controlled substances. The Surrender Letter is found online here:
<https://health.maryland.gov/ocsa/Pages/CDS-Application.aspx>

You will return your original CDS certificate along with the Surrender letter to OCSA at 1223 W. Pratt Street Baltimore, MD 21223.

17. What if I have access to the CRISP Clinical Query Portal but I was told I am not PDMP Registered?

- a. If you have access to CRISP Clinical Data (hospital encounter, labs, and radiology feeds) through an individual log-in account to CRISP, but do not have access to view PDMP data (controlled substances prescription dispensing), you may have a CRISP account but still not have met the PDMP registration requirements. This is easy to fix by simply calling the CRISP Operations Support staff at 877-952-7477 and informing them that you have a CRISP clinical account without PDMP, and you need to become PDMP registered.

18. What should I do if I am retired, have moved out of state, allowed my CDS permit or pharmacist license to lapse, or am reaching out on behalf of a deceased provider?

- a. If you fall under any condition that means you no longer prescribe CDS or practice pharmacy in Maryland or under a Maryland license, you should confirm this status or intention to the Maryland PDMP Office in writing at mdh.pdmp@maryland.gov. More specific instructions follow:
 - i. If you are retired but wish to keep your CDS registration active – PDMP registration is required and OCSA notification is required to include registrant address update.
 - ii. If you are retired and wish to surrender your CDS registration – PDMP notification is required but registration is not required. Additionally, OCSA requires the registrant to mail the CDS permit and surrender letter to OCSA.
 - iii. If you have moved out of state but wish to keep your CDS registration active – PDMP registration is required. Additionally, OCSA Notification and change of address is required.
 - iv. If you have moved out of state and wish to surrender your CDS registration - PDMP notification is required but registration is not



required. Additionally, OCSA requires the registrant to mail the CDS permit and surrender letter to OCSA.

- v. If you are reaching out on behalf of a deceased provider – PDMP notification is required. Additionally, OCSA Notification and return of the CDS permit (if possible) is required.

19. Can Veterans Administration or other federal healthcare providers register with the PDMP?

- a. If you are a CDS prescriber or a pharmacist authorized to prescribe or dispense, respectively, at a federal facility located in Maryland, you may register for and access PDMP data.

20. Are pharmacists working in other states (not in MD) including pharmacists with mail-order pharmacies, required to register for PDMP?

- a. Yes, the mandated registration requirement applies to all dispensers with an active Maryland pharmacist license dispensing to Maryland residents (regardless of state they physically work in). Pharmacist registration is required by July 1, 2017.

21. I am a pharmacist with an active Maryland license number, but I am not dispensing/practicing. Am I required to register with the PDMP?

- a. Yes, the legislation applies to all pharmacists with an active Maryland pharmacist license (regardless of their employment status). For pharmacists that fall into this category, when you register for the PDMP, enter “No Organization” in the Organization field presented during registration.

22. Are Anesthesiologists required by law to register for PDMP?

- a. Yes, Anesthesiologists are required by law to register for PDMP if they possess a CDS permit.

23. Are Researchers with CDS permits required to register for PDMP?

- a. No, individuals who have a CDS permit for research (Schedule I or Schedule II-V) do not have prescriptive authority and thus are not subject to the requirement to be registered with the PDMP before receiving a new or renewal CDS Permit.