



# Non CDS Medication Submission

## Overview

The Maryland Health Care Commission (MHCC) and CRISP will begin collecting non-controlled substances (“non-CDS”) in accordance with Maryland House Bill 1127 Public Health – State Designated Exchange – Health Data. CRISP, in partnership with Leap Orbit, has built an infrastructure to receive, process, store and deliver non-CDS data.

Through the contract between CRISP and Leap Orbit, dispense data will be securely collected and stored using RxGov. This is a web-based program that does not require additional hardware or software. **Starting September 1st, 2025**, dispensers that already submit controlled substance data to the Maryland PDMP can simply use their existing accounts to submit noncontrolled dispense data. Dispensers that do not already submit dispense data to the Maryland PDMP will need to register with RxGov [here](#) before they can begin submitting dispense data<sup>1</sup>.



Through this new infrastructure, CRISP clinical users will be able to review data on all medications a patient has received – not just controlled substances. This helps providers stay properly informed about their patient when prescribing, as well as monitor whether a prescription has been filled by the patient. When accessing medication data for a patient users will find noncontrolled medication data as part of the standard clinical data, keeping all the information centralized in one place.

## Reporting Processes

To minimize burden and duplication of data, processes for non-CDS reporting are similar to existing technical requirements for reporting to the Maryland PDMP. Dispensers who already report CDS data to the PDMP can submit one file with both CDS and non-CDS dispense information. The database will identify and separate CDS and non-CDS medications, as each as their own set of validation rules to determine errors and warnings. Dispensers who have not previously submitted to the PDMP can submit their file through RxGov once registered.

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<sup>1</sup> Dispensers not already connected with Maryland PDMP will **not** be able to submit data with RxGov until **September 1st**.