



STATE OF MARYLAND

DHMH

Maryland Department of Health and Mental Hygiene

Lawrence J. Hogan, Jr., Governor – Boyd K. Rutherford, Lt. Governor – Van T. Mitchell, Secretary

March 12, 2015

RE: Controlled Dangerous Substance Registration Regulation: COMAR 10.19.03.03

Dear Colleague:

This letter serves as a clarification of the recent communication on licensing requirements from the Board of Physicians. There were two new requirements explained in that communication. The first is the 1 hour of CME on appropriate pain management as part of the routine Maryland licensing process. For more information on this please visit the Board of Physicians website at: <http://www.mbp.state.md.us/pages/overdose.html>

In that communication there was also mention of a new CDS permit requirement. This is based on the following regulations. The Maryland Department of Health and Mental Hygiene recently solicited comments for changes to COMAR 10.19.03.03. The proposed changes would add requirements to obtain a Controlled Dangerous Substance (CDS) permit. Namely, applicants who are authorized under Health Occupations Article to prescribe prescription drugs shall: (1) complete a Department approved education module on substance abuse disorders treatments and resources and (2) register with the Prescription Drug Monitoring Program.

This requirement has not been approved. Unless you are otherwise notified by the Division of Drug Control (DDC), CDS permit requirements have not changed.

The Division of Drug Control continues to make progress towards the implementation of the web-based CDS application and renewal system. The anticipated timeline for implementation of the web-based system is Fall 2015.

If you have additional questions, please contact Audrey Clark, Chief, Division of Drug Control, at 410-764-2899 or mddc@maryland.gov.

Sincerely,

Mona K. Gahunia, D.O.
Chief Medical Officer

cc: Van T. Mitchell, Secretary
Laura Herrera Scott, M.D., MPH, Deputy Secretary of Public Health
Audrey Clark, Chief, Division of Drug Control
Devinder Singh, M.D., Chair, Maryland Board of Physicians
Christine A. Farrelly, Executive Director, Maryland Board of Physicians