

**FISCAL NOTE
PRIVATE COST**

- I. Department Title: Department of Health and Senior Services**
Division Title: DIVISION 30—Division of Regulation and Licensure
Chapter Title: Chapter One—Controlled Substances

Rule Number and Title:	19 CSR 30-1.015 Registrations and Fees
Type of Rulemaking:	Rule Amendment

II. SUMMARY OF FISCAL IMPACT

Estimate of the number of entities by class which would likely be affected by the adoption of the rule:	Classification by types of the business entities which would likely be affected:	Estimate in the aggregate as to the cost of compliance with the rule by the affected entities:
32,066 people registered to conduct business with controlled substances	Hospitals, physicians, dentists, podiatrist, optometrists, veterinarians, mid-level practitioners, pharmacies, distributors, importers, exporters,	\$48,099.00 annually

III. WORKSHEET

Currently, there are a total of 34,400 registrants. Out of this population, 32,066 registrants are in the private sector and the remainder are in the public sector. Out of the 32,066 registrants in the private sector that apply annually to get a state controlled substance registration, 95% apply online and click to pay with a credit card. The remaining 5% apply via a paper application. Public sector, government paid employees are exempt from paying registration fees.

Currently, registrants who pay for their registration via credit card pay on average a \$1.50 credit card processing fee. Since this rule eliminates the option of paying the registration fees via personal, certified, or cashier’s check, all registrants that are required to pay registration fees will incur the \$1.50 credit card processing fee. Assuming 32,066 registrants will now have to pay the credit card processing fee of \$1.50, the total cost to comply with this proposed rule is \$48,099.00

IV. ASSUMPTIONS

The Department is working toward having everyone apply for their annual drug registrations online and then eliminate the paper application process unless there is an unforeseen emergency. Applicants will have to apply online electronically.

Medical providers in the industry already have computers and the ability to submit this data. They are already complying with laws regarding:

- Using electronic medical records;
- Mandatory computer submissions to bill and conduct business with Medicare and Medicaid;
- The federal DEA is implementing regulations that all applications must be online and electronic;
- Missouri Legislature enacted a law to require all controlled substance prescriptions to be electronically submitted

A paper application filled out by a registrant and mailed in to the department will take the registrants approximately 15 minutes of their time and then mailing costs. That registration process may take up to ten days.

At the department the application is handled by the mail room, then the fee receipt office for deposit, and then applications are hand entered into the database by staff. This process hits three separate department offices and is why it takes multiple days. The department pay to archive the applications.

Applying online takes 5 minutes and a new registration can be issued in one business day.