



HOW TO PRESCRIBE CBD

By Dr. Karen Keough, MD

The Texas Compassionate Use Act (SB 339) allows qualified physicians to prescribe low-THC cannabis to certain patients diagnosed with intractable epilepsy. As such, only physicians who specialize in the field of examining, diagnosing and treating epilepsy can qualify to prescribe medical cannabis at this time. Physicians are required to register with the Texas Department of Public Safety's Compassionate Use Program (CUP) before prescribing medical cannabis oil to patients.

The process of registering with the medical cannabis program is understandably foreign to most physicians. But it's relatively straightforward and took me less than 10 minutes. To help clarify the process, here's a quick rundown of how I did it.

Registering as a physician with Texas' Compassionate Use Program

Step 1: Getting started.

To start the process, visit the Texas Department of Public Safety Compassionate Use Registry Portal, and click the "Physician Registration" link located under the "Licensing" tab.

Step 2: Submit your name and email address.

You'll be directed to a "Physician Email Invitation and Validation" page where you'll be prompted to submit your full name and email address. Once submitted, you should receive an email that contains a link providing access to the physician registration wizard.

Step 3: Complete the physician registration application. The "physician registration wizard" application contains five pages. The initial page contains instruction details regarding the information you'll be required to include in the proceeding pages.

The second page – "My Details" – requires you to submit your full name, phone number, driver license number and driver license audit number.

The third page – "My Certifications" – requires you to enter a valid Texas Medical Board License number and gives you the option to attach a scanned copy of your Texas Medical Board License. This page also requires you to list the specific qualifications you possess that authorize you to be eligible to prescribe low-THC cannabis. Select the appropriate qualification from the drop down menu and add the diplomate number. You'll also have the option to attach a scanned copy of your

certificate. If you have multiple qualifications, you can click the blue "Add Another" button at the bottom of the page after entering the first qualification and add the specifics of your second qualification.

The fourth page – "Addresses" – requires you to enter your primary clinic name and physical address, including the county, as well as the clinic's mailing address.

The fifth and final page of the registration wizard is the "Signature" page. Check all appropriate acknowledgement/attestation boxes and type your full legal name at the bottom of the page and click submit.

Step 4: Await department approval.

After submitting your application through the registration wizard, you'll receive a confirmation email with a tracking number, and the department will review your application and verify your qualifications. The verification process can take up to 10 business days, but I got my registration approval email the same day I submitted my application.

Your registration approval email verifies that your application was approved and provides a hotlink to access the CURT system, where you can create your account and enter patient prescription information.

After creating your username, password and security questions, you'll be ready to log in and add patients to your physician's profile. After logging in, you can access step-by-step instructions under the "Help" tab that walk

you through the process of adding a patient, a secondary consult, a treatment plan, safety and efficacy information and prescription information in the CURT system.

A few days after receiving my initial registration approval, I received another email from DPS asking if I'd like to be included on the state's published list of physicians registered with the medical cannabis

program. I choose to do this, hoping it will facilitate patient access.

If the department doesn't contact you by email within 10 business days, they recommend using the "Contact Us" options listed on the Texas DPS Compassionate Use Program webpage. If your registration is denied for some reason, you can contact the Regulatory Services Division for further explanation.

Prescribing medical cannabis as a Texas physician

After DPS approves your application and you create your CURT account, you are legally permitted to prescribe low-THC medical cannabis products to certain patients diagnosed with intractable epilepsy. Patients must be permanent residents of Texas.

The law defines intractable epilepsy as "a seizure disorder in which the patient's seizures have been treated by two or more appropriately chosen and maximally titrated antiepileptic drugs that have failed to control the seizures."

You must determine the potential risks associated with prescribing low-THC cannabis to a patient are reasonable in light of the potential benefits to that patient, and then you're required to register as the prescriber for that patient and submit your diagnosis and treatment plan with the CURT system.

You'll need the last five digits of your patient's social security number to register them, as well as the last four of the patient's legal guardian, if the guardian will be responsible for the patient's medication.

Treatment plans must include your patient's name and date of birth, along with their prescribed dosage, the means of administration ordered and the total amount of low-THC cannabis required to fill the patient's prescription. You must also indicate your means for monitoring the patient's symptoms, tolerance and reaction to low-THC cannabis.

When crafting your patient treatment plan, remember that only non-smokable forms of cannabis are approved under the law.

Acceptable forms of cannabis ingestion methods include tinctures and other products made from cannabis oil.

Before your patient or their legal guardian can fill their medical cannabis prescription at a state-licensed dispensing organization, a second CUP-registered physician must concur with your initial diagnosis and treatment plan, and the second physician's concurrence must be noted in the patient's medical record in the CURT system. The secondary physician isn't required to have contact with the patient. As the primary physician, you can discuss the patient's condition with a secondary physician for approval. The secondary physician will need to provide their CURT username to you, and you'll enter this information under the patient details.

It should be noted that a patient can see a CURT-registered physician solely for the purpose of receiving a CBD oil prescription, while retaining their existing relationship with their primary physician/neurologist.

The patient information you provide to CURT will be stored in a secure online database designed to help enforce patient purchasing limits and allow law enforcement to identify individuals who are legally allowed to purchase and possess medical cannabis in the state of Texas.

The system is now available to physicians and dispensing organizations 24 hours a day, enabling doctors to be fully prepared for their patients when these high-CBD products become available in the next few months.



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