CMS EPCS | Electronic Prescribing for Controlled Substances

CMS EPCS Program
Measurement Year 2023 Prescriber Compliance Status:
EPCS Prescriber Portal for Checking Status and Applying for Waiver
September 2024 Webinar Transcript

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CMS EPCS Electronic Prescribing for
Controlled Substances

Michelle Fulton:	Slide 1: Hello and welcome to the CMS Electronic Prescribing for Controlled Substances, or EPCS, Program's webinar on Measurement Year 2023 Prescriber Compliance Status: EPCS Prescriber Portal for Checking Status and Applying for Waiver. My name is Michelle Fulton. I am the CMS EPCS Program instructional designer and content manager at Rainmakers Strategic Solutions.
	Slide 2: For a PDF of today's presentation, download the file from the Chat section on the Zoom platform.
	At the end of this presentation, you will receive an invitation to complete an online evaluation on this webinar. We value your feedback and will use it to improve future sessions.
	Now let us turn the presentation over to Mei Zhang, the CMS EPCS Program lead, to open today's session.
Mei Zhang:	Slide 3: Thank you, Michelle. Welcome, everyone. We appreciate your taking the time today to join the EPCS webinar.
	The Electronic Prescribing for Controlled Substances, or EPCS, compliance program aims to improve patient safety and reduce prescriber burden.
	The measurement year 2023 prescriber compliance status is out on the EPCS Prescriber Portal starting September 16.
	We want to demonstrate how prescribers and their representatives can use the portal to check prescriber compliance status and apply for waiver, if needed, until November 18.
	In this webinar, we will overview the measurement year 2023 compliance requirement and demonstrate using the prescriber portal.
	I will now turn the presentation over to Michelle.
Michelle:	Slide 4: Today's other presenter is Tara McAdoo, who will demonstrate how to access and navigate the CMS EPCS Prescriber Portal. Then to wrap up, Tara and I will oversee the Q&A session.
	Slide 5: Here's today's agenda. We will discuss a CMS EPCS Program overview of the measurement year 2023 requirement, the EPCS Prescriber Portal for checking a prescriber's compliance status and applying for a waiver, and program resources.

We will also hold a Q&A session at the end of the presentation.

Slide 6: This presentation was prepared as a tool to assist providers and neither grants rights nor imposes obligations. Although every reasonable effort has been made to assure the accuracy of the information within these pages, the ultimate responsibility for compliance with the CMS EPCS Program lies with the provider of services.

Slide 7: Submit questions related to the webinar topic through the Q&A panel. We will answer them at the end of the webinar as time permits. We will then address any additional questions in a Q&A document and publish it on the CMS EPCS Program webpage as soon as possible.

After the presentation, submit any remaining questions related to the webinar topic, including the webinar name, through the Center for [Clinical Standards and Quality, or CCSQ, Support Central](#) webpage.

For a question unrelated to the webinar topic, we recommend first searching for an answer on the [CMS EPCS Program](#) webpage. If you still cannot find an answer, submit the question through the [CCSQ Support Central](#) webpage.

Slide 8: Let's start with a high-level overview of the CMS EPCS Program.

The Substance Use-Disorder Prevention that Promotes Opioid Recovery and Treatment for Patients and Communities Act, or the SUPPORT Act, of 2018 was enacted into law to address the opioid crisis. Section 2003 of the SUPPORT Act mandates that prescribers must electronically prescribe Schedule II, III, IV, and V controlled substances under Medicare Part D and Medicare Advantage prescription drug plans in accordance with an electronic prescription drug program.

The Centers for Medicare & Medicaid Services, or CMS, analyzes prescription drug claims for Medicare Part D Schedule II through V controlled substances and uses the prescriber's National Provider Identifier, or NPI, to measure a prescriber's compliance.

Electronic prescribing for controlled substances, or EPCS, enhances patient safety through patient identity checks, medication recommendations, and timely and accurate transmission of time-

sensitive prescriptions. EPCS also reduces prescriber burden by deterring and detecting prescription fraud and irregularities, improving workflow efficiencies, avoiding data errors, and reducing pharmacy calls for clarifying written prescriptions.

Slide 9: The CMS EPCS Program requires prescribers to transmit at least 70% of their Schedule II, III, IV, and V controlled substance prescriptions under Medicare Part D and Medicare Advantage drug plans electronically, after exceptions. For 2023, these exceptions include prescriptions when the prescriber and pharmacy are the same entity; prescribers who issue 100 or fewer qualifying prescriptions during the measurement year; prescriptions issued when the prescriber is located in the geographic area of an emergency or disaster declared by a Federal, State, or local government entity; and prescribers who have requested and received a waiver from CMS for the 2023 measurement year when circumstances beyond their control prevented them from meeting the EPCS requirement.

Slide 10: On the CMS EPCS Prescriber Portal, prescribers may view their EPCS compliance status for the 2023 measurement year and submit a waiver application for any additional extraordinary circumstances outside of their control — such as technology limitations.

Slide 11: Prescribers should consider submitting a measurement year 2023 waiver application if they do not meet the 70% e-prescribing threshold program requirement, after exceptions. Although a waiver application is optional, due to national declared public health emergency in 2023, submitting a waiver application explaining additional extraordinary circumstances outside their control will give CMS a better understanding of prescriber circumstances and improve the CMS EPCS Program. The application period for the waiver opened on September 16, 2024. The waiver application deadline for the CMS EPCS Program 2023 measurement year is 8 p.m. Eastern time on Monday, November 18, 2024.

Starting September 2024, informational notices will be sent to prescribers who met the 2023 EPCS requirement only due to declared national public health emergency, as permitted under 42 C.F.R., as referenced on the slide. For more information on declared public health emergencies, visit ASPR.hhs.gov.

Slide 12: Note that users will need a Health Care Quality Information Systems, or HCQIS, Access Roles and Profile, or

HARP, username and password to log in to the EPCS Prescriber Portal. These are the same login credentials used for the Quality Payment Program. If you do not have a [HARP account](#), apply for one as soon as possible.

Now I will turn the call over to Tara. She will cover the live demonstration of the EPCS Prescriber Portal. Tara, the floor is yours.

Tara McAdoo:

Slide 13: Thank you, Michelle. Before we discuss how to access the CMS EPCS Prescriber Portal, let us discuss what users should expect to see in the portal.

The EPCS Prescriber Portal is for prescribers of Schedule II through V controlled substances under Medicare Part D.

Once in the EPCS Prescriber Portal, users can review the prescriber's annual compliance status, including any automatic exceptions; submit a waiver application for the measurement year, noting any circumstances beyond the prescriber's control; and review the status of the prescriber's waiver application.

Designated representatives for prescribers can access the EPCS Prescriber Portal by initially visiting the CQR Portal at CQR.cms.gov.

They will then see "Welcome to Clinician Quality Reporting." From there, they should click the Visit EPCS button, which will take them to the CMS EPCS Prescriber Portal login page. They should then select the Log In button.

Slide 14: Once the user has selected Log In, they will be prompted to access the EPCS Prescriber Portal using their HARP user ID and password. After entering their HARP credentials, the user should click the Sign in button and then agree to the statement of truth by selecting the Yes, I agree button.

Slide 15: The next step is for the user to verify their identity through two-factor authentication.

To access the EPCS Prescriber Portal, a user must use the two-factor authentication options set up for their HARP account. After they receive their one-time code through either email or text message, they should click the Verify button.

For more on setting up a HARP account, visit the HARP Help webpage at HARP.cms.gov/login/help.

Slide 16: After completing two-factor authentication, the user will see the Check NPI Compliance Status / Submit Waiver Application screen.

For demonstration purposes of the EPCS Prescriber Portal, we are using a test site with fake NPIs to show the different portal functions.

From this page of the EPCS Prescriber Portal, a user can check the prescriber's 2023 compliance status using the prescriber's NPI number. In the field to the left of the Check Status box is a field for the prescriber's NPI. The user should enter the prescriber's NPI into this box and then click the Check Status button.

The next few slides will cover the different compliance statuses, which indicate whether the prescriber is compliant, should consider submitting a waiver application, or does not need to act further.

Slide 17: Once the user enters the prescriber's NPI, the prescriber's 2023 compliance status will appear. Here is an example of a prescriber who meets compliance.

If a prescriber sees a green box that says "NO FURTHER ACTION REQUIRED: NPI meets the CMS EPCS Program requirement," this indicates that the prescriber has met the CMS EPCS Program requirement. To be considered compliant, the prescriber must have electronically prescribed at least 70% of the qualifying Medicare Part D Schedule II through V controlled substance prescriptions or received a small prescriber exception or declared disaster exception. Note that for measurement year 2023, the declared national public health emergency is also part of the declared disaster exception.

Now let's dive deeper into the data.

The prescriber's name and taxonomy are located on the left side of the screen.

Also on the left are the total number of the prescriber's Part D prescriptions filled during the measurement year. In this example, you can see that there are 90. Hovering over the question marks on the screen provides additional information about how CMS determined these numbers.

Next, we see that the prescriber sent one of those prescriptions electronically, resulting in 1% of the prescriptions being electronically prescribed. This percentage is below the 70% program requirement.

However, let's look at the right side of the box to assess any exceptions that CMS may have applied for this prescriber.

You can see that this prescriber met two exceptions: the declared disaster exception and the small prescriber exception. The small prescriber exception means that the prescriber total number of Part D prescriptions for the measurement year was 100 or below. The national public health emergency is part of the declared disaster exception.

Slide 18: If a user enters a prescriber NPI and the prescriber's 2023 compliance status appears pink with a read outline, this indicates that the prescriber has the option to submit a waiver application.

This status also indicates that the NPI met the EPCS requirement in the 2023 measurement year only because of the declared national public health emergency. The prescriber is encouraged to report any additional circumstances beyond their control by submitting a waiver application.

On the left, prescribers can see the total number of Part D prescriptions filled during the measurement year. In this example, the prescriber has 2,257 total Part D prescriptions. Next, we see that the prescriber sent 1,409 of those prescriptions electronically, resulting in 62% of their prescriptions being prescribed electronically. The red triangle indicates that the percentage is below the 70% program requirement.

Although the prescriber received a declared disaster exception due to declared national public health emergency, the prescriber may consider submitting a waiver application if they experience any additional circumstances beyond their control.

Slide 19: Now let's walk through how to submit a waiver.

First, click Apply for Waiver. This button will appear only for prescribers with a red box status.

Slide 20: Next, the user should review the prescriber's details for accuracy.

Under Submitter Details, the user should fill in the appropriate information for the prescriber.

In this demonstration, the prescriber's full name and main email address is provided in the designated fields as well as the email address.

The user also has the option to enter additional email addresses for the prescriber or their email address if they are submitting a waiver application on the prescriber's behalf. A copy of the waiver application will be emailed to each listed email address.

Next, the user should enter the prescriber's phone number and select what their relationship is to the prescriber. If the relationship isn't listed, they should select Other and describe their relationship in the provided text box.

Slide 21: Under Waiver Details, the user should fill in the appropriate information for the prescriber.

They should select the reason or reasons they are submitting a waiver application. Users can check both listed reasons for submitting a waiver application.

By checking the first box, the user is saying they are submitting a waiver application because the prescriber experienced technology limitations outside of their control.

By checking the second box, the user is saying they are submitting a waiver application because of other circumstances outside of the prescriber's control.

Next, in the text box, the user should explain their circumstances in detail. The explanation should be no less than 30 and no more than 500 characters.

Slide 22: Then you may provide any materials to support your application. To upload these materials, the user should click the Select Files button and select the desired files from the computer.

Slide 23: After uploading their file, the user's next step is to agree to the attestation. To review it, the user should click the box next to the attestation statement.

If the user has finished filling out the required fields and is ready to submit the application, they should click the Submit Application button.

If the user is not yet ready to submit the application but would like to save their progress, exit the application, and come back later, they should click the Save & Close button. Note that clicking this means that the user has not submitted the application. The user may also click the Cancel button to leave the application without saving their progress.

If the user is ready to proceed with submitting the waiver application, they should click the Submit Application button, which will open a new window on the screen.

Slide 24: On the next page, the waiver submission summary will appear.

Users should scroll down to read the waiver summary and then click the Certify & Submit button. After they have submitted the application, they will receive a confirmation email from EPCS-EPrescribe@cms.hhs.gov. Once CMS has reviewed the application, the user will receive an email from the same email address, informing them whether the application has been approved or denied.

Slide 25: Following the waiver submission, the user will have access to view waiver application statuses.

The CMS EPCS waiver application section allows the user to view all of the waiver applications they have submitted and filter applications by different statuses, including approved, deleted, denied, draft, submitted, and withdrawn.

Slide 26: Under the waiver summary, there is a list of waivers in the table.

For each waiver in the table, the user has two options in the Actions column: View and Withdraw. To download a waiver application, the user should click View from the Actions column to open a window including information associated with the waiver. From this window, the user can download a PDF version of the waiver information by clicking on the waiver ID and selecting Download Application to PDF.

The user can also withdraw a submitted application from this window by clicking the Withdraw button.

Slide 27: Another way to withdraw a submitted application is to click Withdraw from the Actions column. A new window will pop up, and the user will need to click the Yes, Withdraw Waiver button to withdraw the application.

After the user has withdrawn the application, they will receive a confirmation email from EPCS-EPrescribe@cms.hhs.gov. As a best practice, we encourage users to maintain documentation of their waiver application and decision status.

Slide 28: Another 2023 compliance status that a prescriber or user may see is a blue box that says, "No further action required for the checked NPI. Check a different NPI number to proceed. CHECK THE WAIVER STATUS TABLE NPI (1000000111) has a waiver application." This means that a waiver request has been submitted and the application is under review, so no further action is required at this time.

Slide 29: The blue box on the screen means that the prescriber was not part of the CMS EPCS Program for the measurement year and no further action is needed.

Slide 30: The final step is to log out of the EPCS Prescriber Portal. This concludes the Measurement Year 2023 Prescriber Compliance Status: EPCS Prescriber Portal for Checking Status and Applying for Waiver demonstration.

I will now turn it over to Michelle to discuss how to access the CMS EPCS Prescriber Portal & Waiver Application User Guide, the EPCS Program educational resources, and technical assistance support available to prescribers.

Michelle: Thank you, Tara. To access the CMS EPCS Prescriber Portal & Waiver Application User Guide, scan the QR code on this slide.

Slide 31: Here are some CMS EPCS Program educational resources available to prescribers, their representatives, and the public.

First, the CMS EPCS Program webpage is the go-to place for learning more about the program. It includes information on the program's background, milestones, and how to sign up for the LISTSERV.

The CMS EPCS Program webpage also has some resources including past webinar recordings, transcripts, and handouts. It also has educational documents, such as the EPCS Program Getting Started Quick Reference Guide, EPCS Frequently Asked Questions, EPCS Glossary, EPCS Regulatory Milestones, and the CMS EPCS Program Guidance Regarding the Role of the Pharmacy and Pharmacist.

The CMS EPCS Program's LISTSERV is its primary communication channel. As the CMS EPCS Program is relatively new, signing up for and encouraging others to sign up for the LISTSERV can help you and your colleagues become more familiar with the program.

For assistance setting up a HARP account, visit the HARP Help webpage at HARP.cms.gov/login/help.

Slide 32: Lastly, we have the CCSQ Support Central webpage for those who would like to ask questions about the CMS EPCS Program. On this webpage, you can submit a question or issue you have regarding the program. Phone support is also available Monday to Friday, from 8 a.m. to 8 p.m. Eastern time. You may also email your questions.

We encourage you to contact CCSQ Support Central if you have questions that are not answered.

That concludes the presentation session.

Slide 33: For a PDF of today's presentation, download the file from the Chat section on the Zoom platform.

At the end of this presentation, you'll receive an invitation to complete an online evaluation on this webinar. We value your feedback and will use it to improve future sessions.

Tara: Slide 35: After the event, submit any remaining related questions through the CCSQ Support Central webpage and include the webinar's name.

For a question unrelated to the webinar topic, we recommend first searching for the answer on the CMS EPCS Program webpage. If you still cannot find one, submit the question through the CCSQ Support Central webpage.

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Slide 36: This concludes our presentation. We appreciate your participation! Thank you and have a great day!

Please note: *The Q&A section of the webinar will be posted separately on the CMS EPCS Program website.*