

# CMS Electronic Prescribing for Controlled Substances (EPCS) Program

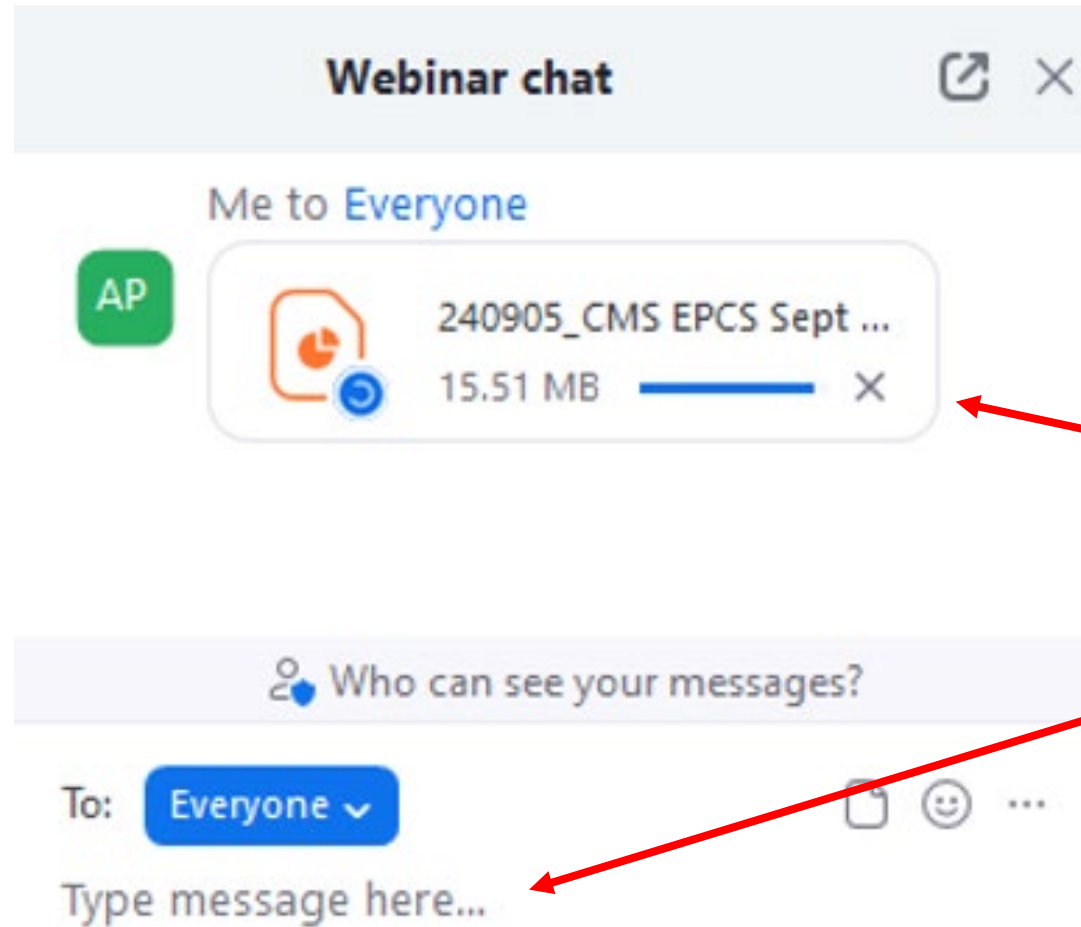


**Measurement Year 2023  
Prescriber Compliance Status:  
EPCS Prescriber Portal for Checking  
Status and Applying for Waiver**

***September 26, 2024***

# Download Presentation

## CMS EPCS | Electronic Prescribing for Controlled Substances



# Welcome

# CMS EPCS

Electronic Prescribing for  
Controlled Substances



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Center for Clinical Standards and Quality

Centers for Medicare & Medicaid Services

# Other Presenters

# CMS EPCS

Electronic Prescribing for  
Controlled Substances



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# Agenda

- CMS EPCS Program Overview of the Measurement Year 2023 Requirement
- CMS EPCS Prescriber Portal for Checking Compliance Status and Applying for Waiver
- CMS EPCS Program Resources
- Q&A Session

# Disclaimer

- 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. This presentation summarizes CMS EPCS Program information but is not a legal document. Links to the EPCS rules are included in the presentation.
- This material is a general summary that explains broad information of the CMS EPCS Program but is not a legal document. The links to the EPCS rules have been provided in the slides.

- 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 \(CCSQ\) 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](#).



# Program Overview

## CMS EPCS | Electronic Prescribing for Controlled Substances

- The Substance Use-Disorder Prevention that Promotes Opioid Recovery and Treatment for Patients and Communities Act (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 and Medicaid Services (CMS) analyzes prescription drug claims for Medicare Part D Schedule II–V controlled substances and uses the prescriber's National Provider Identifier (NPI) to measure a prescriber's compliance.
- Electronic prescribing for controlled substances (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.



# 2023 Measurement Year Overview

## CMS EPCS | Electronic Prescribing for Controlled Substances

- 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:
  - 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
  - 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

# 2023 Measurement Year Overview (2)

## CMS EPCS | Electronic Prescribing for Controlled Substances

- 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.

### CMS EPCS Timeline:



# 2023 Measurement Year Overview (3)

## CMS EPCS | Electronic Prescribing for Controlled Substances

- 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 declared national public health emergency in 2023, submitting a waiver application explaining additional extraordinary circumstances outside the prescriber's control will give CMS a better understanding of prescriber circumstances and improve the CMS EPCS Program. The application period for the waiver opened on Sept. 16, 2024. The waiver application deadline for the CMS EPCS Program measurement year 2023 is 8 p.m. ET on Monday, Nov. 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. § 423.160(a)(5)(ii). For more information on declared public health emergencies, visit: [aspr.hhs.gov/legal/PHE/Pages/default.aspx](https://aspr.hhs.gov/legal/PHE/Pages/default.aspx).

# HARP Logins

- Users will need a HARP username and password to log in to the EPCS Prescriber Portal.
  - Health Care Quality Information Systems (HCQIS) Access Roles and Profile (HARP)
    - [harp.cms.gov/login](https://harp.cms.gov/login)

# Accessing the EPCS Prescriber Portal

WELCOME TO

## Clinician Quality Reporting (CQR)

CQR Programs

Quality Payment Program

### Quality Payment PROGRAM

The Quality Payment Program (QPP) was authorized by the Medicare Access and CHIP Reauthorization Act of 2015 (MACRA), which ended the Sustainable Growth Rate formula that would have resulted in a significant cut to payment rates for clinicians participating in Medicare. MACRA advances a forward-looking, coordinated framework for clinicians to participate in the Quality Payment Program, which rewards value in 1 of 2 ways:

- Merit-based Incentive Payment System (MIPS): Clinicians who participate in MIPS are subject to a performance-based payment adjustment on charges under the Physician Fee Schedule.
- Advanced Alternative Payment Models (APMs): Clinicians who participate in an Advanced APM and achieve certain thresholds may be eligible for higher payment rates under the Physician Fee Schedule.

[Visit QPP](#)

CMS Electronic Prescribing for Controlled Substances

## CMS EPCS

Electronic Prescribing for Controlled Substances

The CMS EPCS Program helps address the opioid crisis by requiring that prescribers issuing Schedule II-V controlled substance prescriptions covered under Medicare Part D prescription drug plans transmit those prescriptions electronically to the pharmacy. All prescribers of controlled substances covered under Part D are included in the program regardless of their Medicare participation status. The first measurement year for the program began on January 1, 2023.

[Visit EPCS](#)

Clinician Quality Reporting Portal:  
[cqr.cms.gov](https://cqr.cms.gov)

CQR Programs / CMS EPCS Landing Page

## CMS Electronic Prescribing for Controlled Substances (CMS EPCS)

### CMS EPCS Timeline:

- Jan 1, 2023: 2023 Measurement Year starts
- Dec 31, 2023: 2023 Measurement Year ends
- Aug 1, 2024: CMS begins compliance analysis of 2023 Part D claims
- Sept 16, 2024: Compliance status and waiver application available in the CMS EPCS Portal; non-compliant prescriber notices sent
- Nov 18, 2024: End of waiver application period; final 2023 status available in CMS EPCS Prescriber Portal

**Update**

The COVID-19 Public Health Emergency (PHE) has been extended into the 2023 Measurement Year. Due to this extension, all prescribers are exempted from EPCS requirements. Please navigate to the [CMS EPCS Program page](#) for additional information. Proceed to review the prescriber's compliance result. If the COVID-19 PHE is the only reason for meeting compliance, CMS recommends the prescriber to apply for a waiver if the prescriber experienced extraordinary circumstance(s). Although the COVID-19 PHE indicates that an exception has been made, we encourage prescribers to apply for a waiver if they also experienced additional extraordinary circumstances; this data will not affect the National Provider Identifier (NPI) compliance status for the measurement year but will contribute to improving the user experience for future program years.

CMS Electronic Prescribing for Controlled Substances

## CMS EPCS

Electronic Prescribing for Controlled Substances

Prescribers or their designated representatives can log in to the CMS EPCS Prescriber Portal using their HARP account credentials. Once in the portal, users can review prescriber annual compliance status, automatic exception status, or apply for a waiver for the measurement year.

[Log In](#)

CMS EPCS Prescriber Portal:  
[cqr.cms.gov/epcs/landing](https://cqr.cms.gov/epcs/landing)

# Accessing EPCS Prescriber Portal Using HARP

## Sign in to CMS EPCS

User ID

Password [Show Password](#)

[Forgot user ID or password](#)

If you are a registered user of the Quality Payment Program (QPP) then you can sign into CMS EPCS using that same User ID and Password.

**Sign in >**

OR

**Register for QPP**

## Agree to This Statement of Truth to Sign In ×

I certify to the best of my knowledge that all of the information that will be submitted will be true, accurate, and complete. If I become aware that any submitted information is not true, accurate, and complete, I will correct such information promptly. I understand that the knowing omission, misrepresentation, or falsification of any submitted information may be punished by criminal, civil, or administrative penalties, including fines, civil damages, and/or imprisonment.

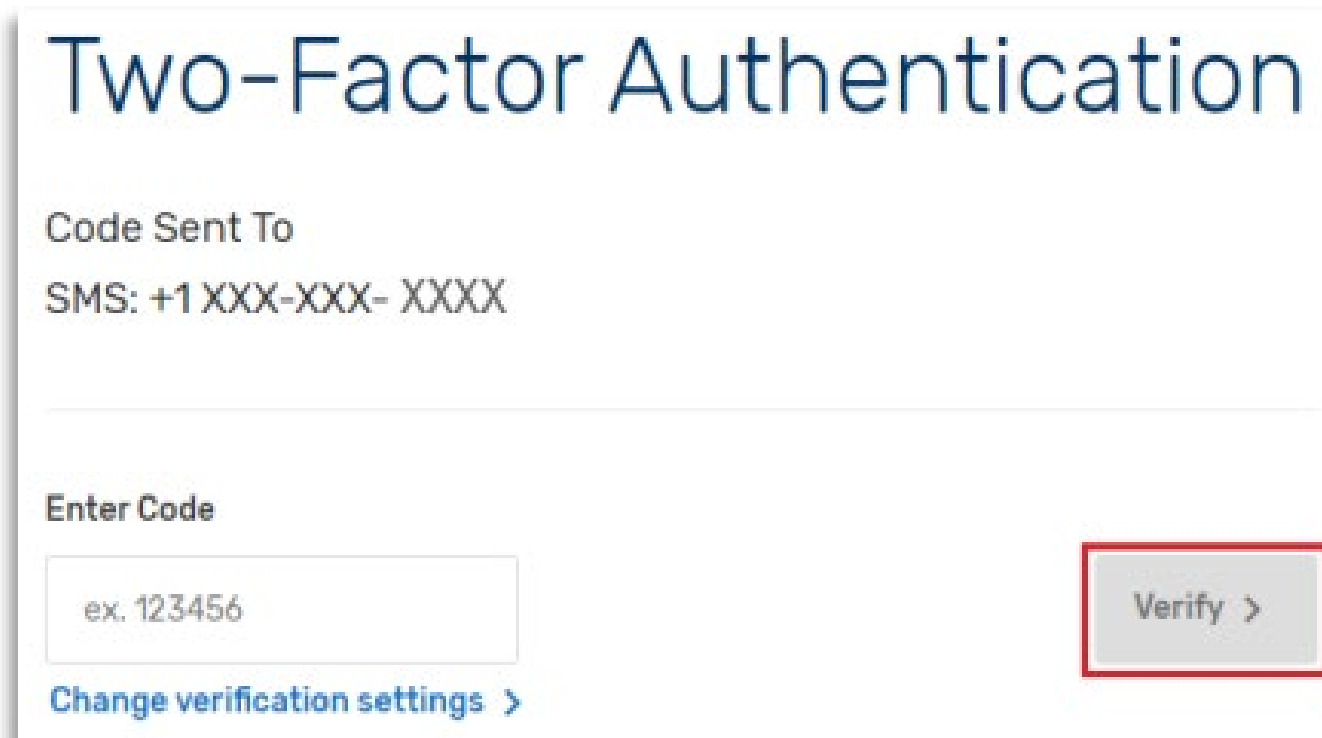
Privacy and security statement:

This warning banner provides privacy and security notices

**Yes, I agree**

Cancel

# Accessing EPCS Prescriber Portal Using HARP (2)

A screenshot of a Two-Factor Authentication (2FA) interface. The title "Two-Factor Authentication" is at the top. Below it, the text "Code Sent To" is followed by "SMS: +1 XXX-XXX- XXXX". A horizontal line separates this from the "Enter Code" section. The "Enter Code" section contains a text input field with the placeholder text "ex. 123456" and a "Verify >" button to its right. The button is highlighted with a red rectangular border. At the bottom left of the form, there is a link "Change verification settings >".

Two-Factor Authentication

Code Sent To  
SMS: +1 XXX-XXX- XXXX

---

Enter Code

ex. 123456

Verify >

[Change verification settings >](#)

HARP Help webpage: [harp.cms.gov/login/help](https://harp.cms.gov/login/help)



# 2023 Measurement Year Compliance Status – Search by NPI

## Check NPI Compliance Status / Submit Waiver Application

Enter the prescriber's NPI below to check compliance status. Non-compliant prescribers who have experienced extraordinary circumstance(s) beyond their control will be able to submit a waiver application for the measurement year.

**NPI**

Note: Please double-check that the correct NPI was entered.

For more information on current CMS EPCS requirements, [visit CMS E-Prescribing](#) 

# 2023 Measurement Year Compliance Status – Meets Compliance

✓ NO FURTHER ACTION REQUIRED: NPI meets the CMS EPCS Program requirement.

## TEST PRESCRIBER 102

INTERNAL MEDICINE

*\*CMS has automatically calculated  
your prescribing data and exceptions*

Total Part D Prescriptions ? 90

Total Prescribed Electronically ? 1

% Prescribed Electronically ?  
≥70% required for compliance ▲ 1%

National Public Health Emergency (PHE) ? ✓ Yes

Declared Disaster Exception ? No

Small Prescriber Exception ?  
≤100 Part D Prescriptions ✓ Yes

# 2023 Compliance Status – Consider Waiver

✘ **CONSIDER SUBMITTING A WAIVER:** NPI (1000000079) meets the CMS EPCS Program requirements only because they received an exception due to declared national Public Health Emergency (PHE). The prescriber may use the waiver application to report additional circumstances beyond control.

- The checked NPI does not meet or exceed the 70% threshold for CMS EPCS for the measurement year.
- The checked NPI has the following exceptions during the measurement year: **declared national Public Health Emergency (PHE)**

Please consider applying for a waiver for this NPI if the prescriber has experienced an extraordinary circumstance that prevented them from meeting CMS EPCS Requirements during the measurement year. CMS recommends the prescriber to apply for a waiver if the prescriber experienced extraordinary circumstance(s). Although the declared national PHE indicates that an exception has been made, we encourage prescribers to apply for a waiver if they also experienced additional extraordinary circumstances; this data will not affect the NPI compliance status for the measurement year but will contribute to improving user experience for future program years.

## TEST PRESCRIBER 7 FAMILY MEDICINE

*\*CMS has automatically calculated  
your prescribing data and exceptions*

|   |       |
|---|-------|
| Total Part D Prescriptions ?                                  | 2,257 |
| Total Prescribed Electronically ?                             | 1,409 |
| % Prescribed Electronically ?<br>≥70% required for compliance | ▲ 62% |

|   |       |
|---|-------|
| National Public Health Emergency (PHE) ?                  | ✔ Yes |
| Declared Disaster Exception ?                             | No    |
| Small Prescriber Exception ?<br>≤100 Part D Prescriptions | No    |

# Submitting a Waiver

✖ **CONSIDER SUBMITTING A WAIVER:** NPI (1000000400) meets the CMS EPCS Program requirements only because they received a national Public Health Emergency (COVID-19) exception. The prescriber may use the waiver application to report additional circumstances beyond control.

- The checked NPI does not meet or exceed the 70% threshold for EPCS for the measurement year.
- The checked NPI has the following exceptions during the measurement year: **Public Health Emergency (PHE) – COVID-19**

Please consider applying for a waiver for this NPI if the prescriber has experienced an extraordinary circumstance that prevented them from meeting EPCS Requirements during the measurement year. CMS recommends the prescriber to apply for a waiver if the prescriber experienced extraordinary circumstance(s). Although the COVID-19 PHE indicates that an exception has been made, we encourage prescribers to apply for a waiver if they also experienced additional extraordinary circumstances; this data will not affect the NPI compliance status for the measurement year but will contribute to improving user experience for future program years.

## TEST PRESCRIBER 40 INTERNAL MEDICINE

*\*CMS has automatically calculated  
your prescribing data and exceptions*

|  |       |  |     |
|--|-------|--|-----|
| Total Part D Prescriptions ?   | 7,760 | Public Health Emergency (PHE) Exception ?                                | Yes |
| Total Prescribed Electronically ?  | 4,138 | Declared Disaster Exception ?  | No  |
| % Prescribed Electronically ?<br><small>≥70% required for compliance</small> | ▲ 53% | Small Prescriber Exception ?<br><small>≤100 Part D Prescriptions</small> | No  |

For more information on current CMS EPCS requirements, [visit CMS E-Prescribing](#)

Apply for Waiver >



# Submitting a Waiver (2)

\* Indicates required field

## Submitter Details

**Name**  
Submitter 1 **1**

**Email Address**  
submitter1@test.com

**Additional Email Address(es)** ? **2**  
Add additional emails  
Hit enter/comma to add multiple

**Phone Number** **3**  
(xxx) xxx-xxxx

**Extension**  
Optional

**Relationship to Prescriber** ? **4**  
Select Relationship to Prescriber  
Prescriber  
Prescriber Staff  
Other

# Submitting a Waiver (3)

### Waiver Details

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- Reason(s) for Submitting Waiver Application
  - ☐ Technological limitations not within control of the prescriber (e.g., service area lacks broadband internet access, and/or software vendor did not install necessary system for conducting EPCS).
  - ☐ Other circumstances outside of prescriber's control.
- In the box below, please provide a detailed explanation of the technical or other circumstances beyond the prescriber's control that prevented the prescriber from meeting the CMS EPCS Program requirement:

Enter description here

500 characters allowed

# Submitting a Waiver (4)

You may upload any documentation that supports your CMS EPCS Program waiver request description of the circumstances beyond the prescriber's control that prevent the prescriber from conducting EPCS in the measurement year. Please see the bullets below for examples of types of documentation you may consider uploading to support your description:

- Documentation showing speed and bandwidth limitations from the available internet service provider(s)
- Vendor or pharmacy correspondence supporting a continued technical issue
- Evidence of a localized disaster or emergency that affected your ability to electronically prescribe (e.g., news article, local disaster declaration, communication with insurance agency)

Drop files to upload

or

Select Files

7

(.pdf, .jpg, .jpeg, .png, .doc, .docx, .xls, .xlsx, .csv, .msg)

Maximum upload file size: 10 MB



# Submitting a Waiver (5)

**Attestation**

**8**

☒ \* I attest that:

On behalf of the Prescriber in this attestation, I am applying for this CMS EPCS Program Waiver Application and attest that the Prescriber is unable to meet Electronic Prescribing for Controlled Substances (EPCS) requirements due to circumstances beyond the Prescriber's control.

Collection of information on this CMS EPCS Program Waiver Application is covered by OMB 0938-1455 – please see the [EPCS Privacy Page](#) for more details.

Cancel

**3  
options**

Save & Close

Submit Application

# Submitting a Waiver (6)

**!** By submitting this CMS EPCS Program Waiver Application, I am certifying that the details entered are correct to the best of my knowledge. Furthermore, I am submitting this waiver application as if I physically signed and submitted a hard copy of this form.

### Submission Summary

**Prescriber Details**  
  
NPI  
100000040  
  
Prescriber Name  
Test Prescriber 40  
  
Prescriber Type  
Internal Medicine

**Submitter Details**

Cancel

Certify & Submit

# Viewing Waiver Status (7)

**CMS EPCS Waiver Applications**

1 Waiver STATUS Draft, +3 ▲

| Waiver ID            | NPI        | Prescriber |
|----------------------|------------|------------|
| <a href="#">3170</a> | 1000000400 | Test Pres  |

☐ All Statuses

☒ Approved

☐ Deleted

☒ Denied

☒ Draft

☒ Submitted

☐ Withdrawn

Subscribe to the CMS EPCS Listserv

# Waiver Summary

| Status                            | Actions                                       |
|-----------------------------------|---|
| <b>Submitted</b><br>On 02/14/2024 | <div><div>View</div><div>Withdraw</div></div> |

Waiver ID 3170

×

Submission Summary

Download Application to PDF

Prescriber Details

NPI

1000000400

Prescriber Name

Test Prescriber 40

Prescriber Type

Internal Medicine

Submitter Details

Close

Withdraw


# Withdrawing Waiver Application

Withdraw Waiver?

×

You are about to withdraw waiver ID **3170**.

Would you like to proceed with this action?

 This action cannot be undone.

Cancel

Yes, Withdraw Waiver

# 2023 Compliance Status – No Further Action Needed: Waiver Already Submitted


## 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.



### TEST PRESCRIBER 11 FAMILY MEDICINE

*\*CMS has automatically calculated  
your prescribing data and exceptions*

Total Part D Prescriptions  1,779


Total Prescribed Electronically  364

% Prescribed Electronically   20%  
≥70% required for compliance

National Public Health Emergency (PHE)   Yes


Declared Disaster Exception  No

Small Prescriber Exception  No  
≤100 Part D Prescriptions

For more information on current CMS EPCS requirement, [visit CMS E-Prescribing](#) 

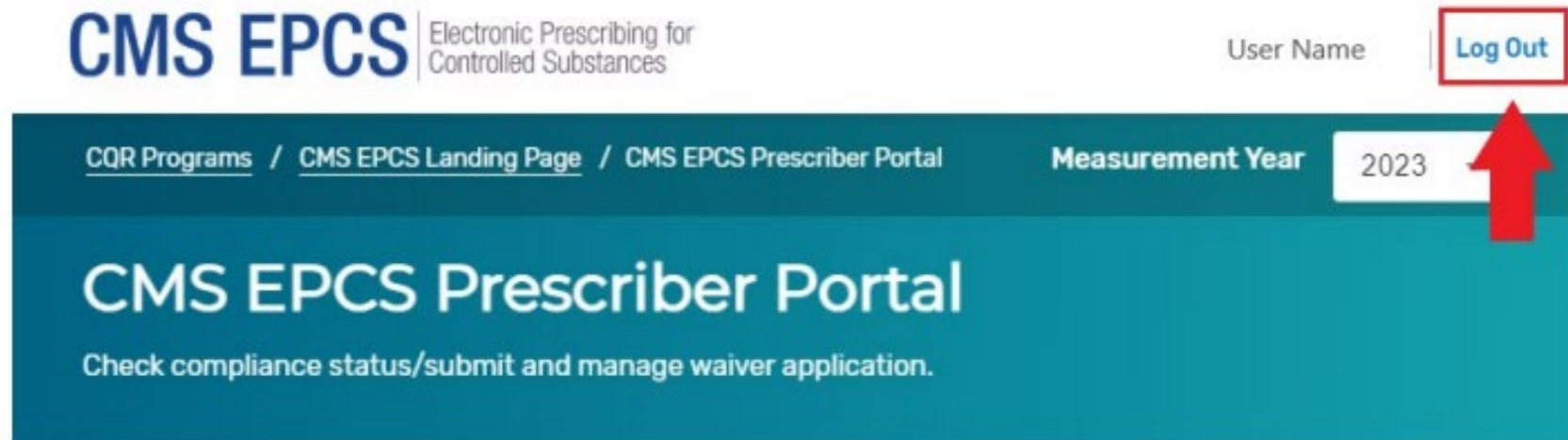
# 2023 Compliance Status – No Further Action Needed: NPI Not Part of Program for Measurement Year

⊘ **NO FURTHER ACTION REQUIRED:** NPI (1000001358) is not part of the CMS EPCS Program for the measurement year (no further actions required)

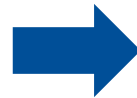
For more information on current CMS EPCS requirement, [visit CMS E-Prescribing](#) 



# Logging Out of the EPCS Prescriber Portal



Open the CMS EPCS Prescriber  
Portal & Waiver Application  
User Guide



SCAN ME

# EPCS Program Resources

- CMS EPCS Program webpage: [cms.gov/medicare/e-health/eprescribing/cms-eprescribing-for-controlled-substances-program](https://cms.gov/medicare/e-health/eprescribing/cms-eprescribing-for-controlled-substances-program)
  - Webinar recordings, transcripts, and handouts
  - Educational documents
- CMS EPCS Program LISTSERV: [public.govdelivery.com/accounts/USCMS/subscriber/new?topic\\_id=USCMS\\_13022](https://public.govdelivery.com/accounts/USCMS/subscriber/new?topic_id=USCMS_13022)
- HARP Help: [harp.cms.gov/login/help](https://harp.cms.gov/login/help)

# CCSQ Support Central

The [CCSQ Support Central webpage](#) is the primary point of contact for questions on the CMS EPCS Program.

## CMS EPCS

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### HOURS

Monday–Friday, 8 a.m. – 8 p.m. ET

*Non-peak hours are before 10 a.m. and after 2 p.m. ET*

### CONTACT US



1-866-288-8292



EPCS-EPrescribe@cms.hhs.gov



Hearing impaired dial 711 for TRS  
Communications Assistant

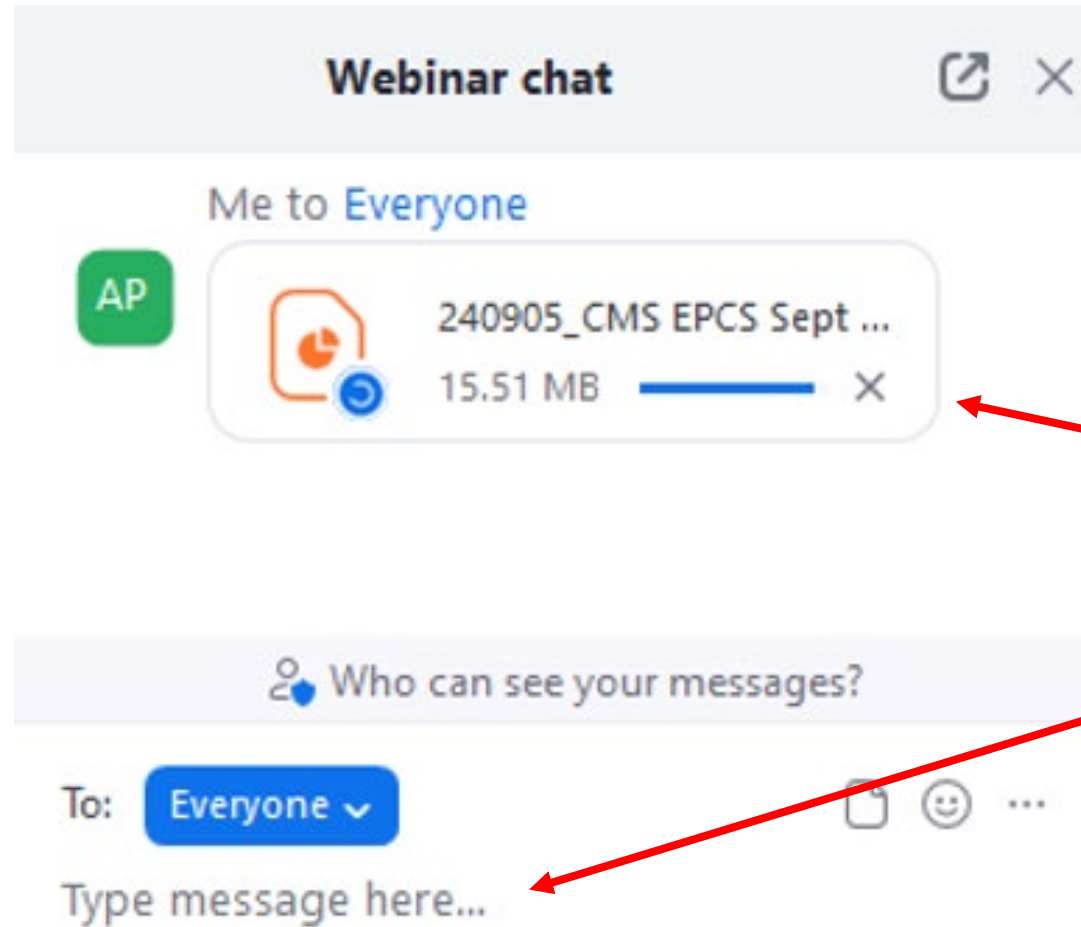


Online at CCSQ Support Central

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# Q&A Session



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# We Appreciate Your Participation

**THANK YOU!**