

CMS Electronic Prescribing for Controlled Substances Program



Program Overview

June 2026

Disclaimer

This presentation is for prescribers who issue Schedule II through V controlled substance prescriptions under Medicare Part D and Medicare Advantage prescription drug, or MA-PD, plans and related health care staff to help them understand the requirement of the CMS Electronic Prescribing for Controlled Substances (EPCS) Program.

This presentation doesn't grant prescribers and related health care staff rights or impose obligations, and it isn't a legal document.

Every attempt has been made to ensure the accuracy of this presentation's information. It is the prescriber's responsibility to correctly prescribe Schedule II–V controlled substances under Medicare Part D.

Objectives

After reviewing these slides, you should be able to:

- Describe EPCS and the CMS EPCS Program requirement
- Identify who must meet the program requirement
- Understand the importance of maintaining current prescriber addresses and email information in the Medicare Provider Enrollment, Chain, and Ownership System (PECOS) and the National Plan and Provider Enumeration System (NPPES)
- Recognize how to use the CMS EPCS Prescriber Portal, including when to submit a waiver application
- Summarize the non-compliance action and what to do after receiving the non-compliance notice



What is EPCS?

What is considered electronic prescribing?



Electronic prescribing

- Secure, electronic, computer-to-computer transfer of error-free and understandable prescription data between pharmacies, prescribers, and payers.



Not electronic prescribing

- Email or a facsimile (fax) transactions
- Prescriptions entered into an electronic system and then printed in order to fill.
- Pharmacy calls where prescription clarification is given verbally; this is considered a telephone prescription.
- Refill authorization given verbally or by fax for a prescription that was previously electronically prescribed.

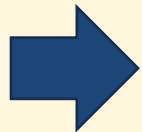
Set Up e-Prescribing Software

Prescribers of controlled substances:

- Must follow DEA guidance; see [DEA's Electronic Prescriptions for Controlled Substances webpage](#)
- Must use a DEA-approved e-prescribing software
- Must register with the DEA prior to prescribing controlled substances unless a DEA exemption is met
- May be subject to State-specific e-prescribing requirements

To avoid potential issues with CMS EPCS Program compliance, prescribers should work with their e-prescribing software vendor to:

- Complete identity-proofing requirements
- Get 2-factor authentication
- Configure logical access control
- Resolve technical issues related to their e-prescribing software



NOTE: If there is an issue with a pharmacy receiving a fax when a prescription should have been sent electronically or for other electronic prescribing software issues, you should reach out to your IT department or your software vendor for assistance.

Beneficiary and Prescriber Benefits

Beneficiaries

Enhances patient safety by:

- Allowing for patient identity checks
- Reducing prescription tampering
- Allowing for medication recommendations that lower the risk of errors and potentially harmful interactions
- Ensuring timely and accurate transmission of time-sensitive prescriptions
- Reducing patient trips to prescriber offices and pharmacies

Prescribers

Reduces prescriber burden by:

- Deterring and detecting prescription fraud and irregularities
- Improving workflow efficiency
- Avoiding data-entry errors and pharmacy calls to clarify paper prescriptions



What is the CMS EPCS Program?

CMS EPCS Program Background and Purpose

The CMS EPCS Program:

- Was established and authorized by section 2003 of the Substance Use-Disorder Prevention that Promotes Opioid Recovery and Treatment for Patients and Communities (SUPPORT) Act of 2018, which was enacted to address the opioid crisis by requiring prescribers to send Schedule II-V drug prescriptions electronically.
- Rules are addressed in the Physician Fee Schedule (PFS) rule for calendar years (CY) 2021 – 2025. The compliance requirement became effective with the first measurement year, CY 2023.
- Monitors Schedule II–V controlled substance prescriptions under Medicare Part D and Medicare Advantage drug plans for EPCS compliance

Program Compliance

To be considered compliant, prescribers must electronically prescribe at least 70% of their qualifying Schedule II–V controlled substances prescriptions under Medicare Part D, after exceptions, in the measurement year (January 1 – December 31).

Prescribers are exempt from the program requirement in the following situations.

- **Small prescriber exception:** CMS automatically grants this exception to prescribers who issue 100 or fewer qualifying Medicare Part D controlled substance prescriptions in the measurement year.
- **Declared disaster exception:** CMS automatically grants this exception to prescribers in the geographic area of an emergency or disaster as determined by CMS. CMS posts a list of the qualifying emergencies and disasters for each measurement year on its EPCS Program webpage.
- **CMS-approved exception:** CMS may grant this exception to a prescriber who submits a waiver application documenting circumstances beyond the prescriber's control that prevented compliance with CMS EPCS program requirement. CMS-approved waiver exceptions only apply to a single measurement year.

Prescriptions written for a beneficiary in a long-term care (LTC) facility will be included in determining compliance no earlier than January 1, 2028.

Who Must Meet the Requirement (1 of 3)

All prescribers—regardless of their Medicare participation status or specialty taxonomy— who issue Schedule II–V controlled substance prescriptions under Medicare Part D or Medicare Advantage prescription drug (MA-PD) plans must meet the CMS EPCS Program requirement.

CMS analyzes Medicare Part D claims data to determine prescriber compliance.



Who Must Meet the Requirement (2 of 3)

I'm a prescriber who doesn't participate in Medicare. Am I included in the CMS EPCS Program?

All prescribers—regardless of their Medicare participation status or specialty taxonomy—must meet the CMS EPCS Program requirement for prescriptions filled under Medicare Part D and MA-PD plans.



Who Must Meet the Requirement (3 of 3)

I practice at various locations. How will my controlled substance prescriptions be measured?

CMS uses a prescriber's National Provider Identifier (NPI) on Medicare Part D claims to identify how many qualifying controlled substance prescriptions were attributed to the NPI during the measurement year, regardless of the prescriber's practice location.



Long-term Care Facilities

In the Calendar Year (CY) 2025 Medicare Physician Fee Schedule (PFS) final rule, CMS finalized that:

- Prescriptions written for a beneficiary in a long-term care (LTC) facility will be included in determining prescriber compliance starting January 1, 2028.
- Compliance actions against prescribers who don't meet the compliance threshold based on prescriptions written for a beneficiary in a LTC facility will start measurement year 2028.
 - The June 2024 Part D and Health IT Standards final rule finalized requiring the NCPDP SCRIPT standard version 2023011 as the e-prescribing standard for transmitting prescriptions for all covered Part D drugs starting January 1, 2028. NCPDP SCRIPT standard version 2023011 permits 3-way communication that would better facilitate LTC workflows in a way that NCPDP SCRIPT standard version 2017071 doesn't.

Check State's Requirements for e-Prescribing Controlled Substances

My state already requires me to electronically prescribe controlled substances. Am I automatically compliant with the CMS EPCS Program?

No. The CMS EPCS Program is a Federal program that is separate from State e-prescribing for controlled substance requirements. Compliance with the CMS EPCS Program requirement will be determined based on Medicare Part D claims data.

Individual states may have their own requirements for e-prescribing controlled substances.

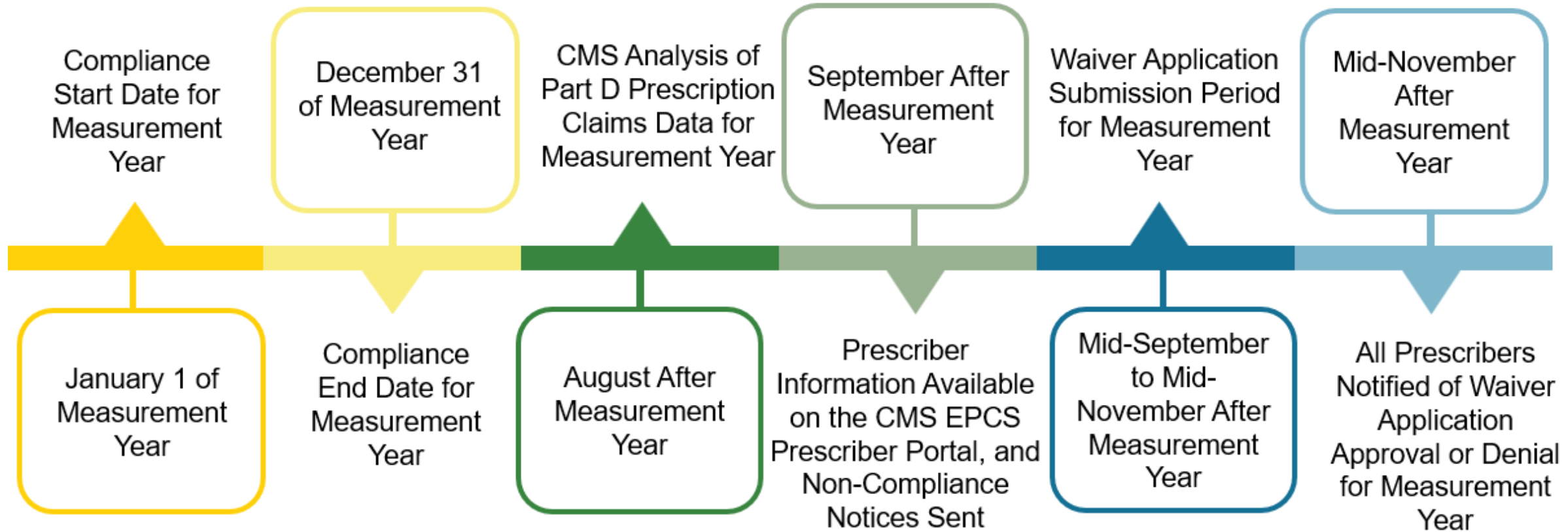
Prescribers should check their specific State's laws and requirements for e-prescribing controlled substances.





**What's the timeline for each phase of the CMS
EPCS Program?**

Measurement Cycle



Compliance Analysis, Notification, and Waiver Application Periods

Compliance analysis period

- Begins in August after the measurement year
- Is when CMS reviews Medicare Part D prescription claims



Notification period

- Takes place in September after the measurement year
- Is when CMS notifies prescribers of their initial compliance status



Waiver application submission period

- Occurs from mid-September to mid-November after the measurement year
- Is when prescribers and their designated representatives can log into the CMS EPCS Prescriber Portal to look up a prescriber's compliance status and submit a waiver application for CMS to determine each prescriber's final compliance status



What's the non-compliance action?

Non-Compliance Action

The non-compliance action is the non-compliance notice from CMS.

Each non-compliant prescriber receives the non-compliance notice during the notification period. The non-compliance notice includes information to a prescriber that they are violating the program requirement, about how they can come into compliance, and on the benefits of e-prescribing for controlled substances.

The notice also includes a link to the CMS EPCS Prescriber Portal where each prescriber may:

- Look up their compliance status
- Submit a waiver application

Final Non-Compliance With the CMS EPCS Program

Final non-compliance under the EPCS Program may be considered in CMS processes for assessing potential fraud, waste, and abuse, which, in some instances, could result in a referral to law enforcement or revocation of billing privileges if evidence of fraud, waste, or abuse is present.





What's the CMS EPCS Prescriber Portal?

CMS EPCS Prescriber Portal

The [CMS EPCS Prescriber Portal](#) is a web platform that a prescriber of Schedule II–V controlled substances under Medicare Part D and their designated representatives can access to:

- View the prescriber’s compliance status for the measurement year
- Submit a waiver application for the measurement year, if needed
- Check the prescriber’s application status

To log in to the EPCS Prescriber Portal, users:

- Need a Health Care Quality Information Systems (HCQIS) Access, Roles, and Profile (HARP) account user ID and password
- Use the same login credentials for accessing the Quality Payment Program (QPP) Portal
- Can apply for a HARP account on the [HARP Create an Account webpage](#)

The waiver application submission is open on the EPCS Prescriber Portal for 60 days from mid-September to mid-November after the measurement year. Prior to the EPCS Prescriber Portal opening, there will be a webinar which will include a demonstration of the EPCS Prescriber Portal.

To receive announcements with exact dates for when the waiver application submission period is open and when the webinar will occur, subscribe to the [CMS EPCS Program Listserv](#).

Submitting a Waiver Application

Each fall after the measurement year, for 60 days typically from mid-September to mid-November, each prescriber and their designated representative may submit a waiver application, as needed, through the EPCS Prescriber Portal to receive a CMS-approved waiver exception when circumstances beyond their control prevented the prescriber from meeting the EPCS Program requirement.

For a CMS-approved waiver application, the prescriber receives a program waiver for the entire measurement year.

Reminder: Update Your Addresses in PECOS and NPPES

CMS encourages prescribers to update their email and mailing addresses in [PECOS](#) and [NPPES](#).

- CMS uses email and United States Postal Service (USPS) to send non-compliance notices to non-compliant prescribers each measurement year.
- CMS also uses addresses in PECOS and NPPES for identifying which prescribers qualify for the automatic declared disaster exception.





Appendix

Important Terms

- [CMS-approved waiver exception](#)
- [CMS EPCS Prescriber Portal](#)
- [CMS EPCS Program](#)
- [Compliance analysis period](#)
- [Declared disaster exception](#)
- [Electronic prescribing for controlled substances \(EPCS\)](#)
- [HARP](#)
- [Long-term care facility \(LTC\)](#)
- [Measurement cycle](#)
- [Measurement year](#)
- [Medicare Advantage prescription drug \(MA-PD\) plans](#)
- [Medicare Part D](#)
- [Medicare Provider Enrollment, Chain, and Ownership System \(PECOS\)](#)
- [National Plan and Provider Enumeration System \(NPPES\)](#)
- [Non-compliance action](#)
- [Non-compliance notice](#)
- [Notification period](#)
- [Small prescriber exception](#)
- [Schedule II–V controlled substances](#)
- [Substance Use Disorder Prevention that Promotes Opioid Recovery and Treatment for Patients and Communities \(SUPPORT\) Act](#)
- [Waiver](#)

Program Resources

- [CMS EPCS Program webpage](#):
 - 2025 Declared Disaster Exception Fact Sheet
 - Getting Started Quick Reference Guide
 - Glossary
 - Frequently Asked Questions
- [CMS EPCS Program Listserv](#)
 - Receive general notifications about the CMS EPCS program, upcoming events, updated materials, and more
- [CCSQ Support Central](#)
 - CCSQ Support Central can't answer questions about electronic prescribing software
- [HARP Contact Help Desk webpage](#)