CMS EPCS | Electronic Prescribing for Controlled Substances

CMS EPCS Program Getting Started Quick Reference Guide

Overview

Electronic Prescribing for Controlled Substances

Electronic prescribing for controlled substances (EPCS) is the electronic transmission of an error-free and understandable prescription for controlled substances from the issuing prescriber's point of care to a pharmacy. E-prescribing for controlled substances enhances patient safety through patient identity checks, medication recommendations, and timely and accurate transmission of time-sensitive prescriptions. It also reduces prescriber burden by detecting and preventing prescription fraud and irregularities, improving workflow efficiencies, avoiding data errors, and reducing pharmacy calls for clarifying written prescriptions.

CMS EPCS Program Requirement

The CMS EPCS Program, established and authorized by Section 2003 of the Substance Use Disorder Prevention that Promotes Opioid Recovery and Treatment for Patients and Communities (SUPPORT) Act (Public Law 115-271), requires prescribers to meet the compliance threshold unless they qualify for at least 1 of the automatic exceptions or receive the CMS-approved waiver exception for the measurement year. The compliance threshold is that prescribers must e-prescribe at least 70% of their qualifying Schedule II–V controlled substance prescriptions for patients covered under Medicare Part D and Medicare Advantage prescription drug (MA-PD) plans in the measurement year

The measurement year begins January 1 and ends December 31 of the same year. The compliance analysis includes Medicare Part D claims with a date of service or fill date of January 1–December 31 of the measurement year. The notification period takes place in September after the measurement year and is when CMS notifies prescribers of their initial compliance status and any associated review or waiver application process.

Prescribers will be exempt from the requirement in the following situations:
- **Small prescriber exception**—CMS grants this exception automatically to prescribers who issue 100 or fewer qualifying Medicare Part D controlled substance prescriptions in the measurement year.
- **Declared disaster exception**—CMS grants this exception automatically to prescribers in the geographic area of an emergency or disaster identified by CMS. CMS posts a list of the qualifying emergencies and disasters on the CMS EPCS Program webpage.
- **CMS-approved waiver exception**—CMS grants this exception to each prescriber who submits and then receives an approved waiver application because the prescriber explained how they were unable to meet the program compliance threshold due to circumstances beyond their control.

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

The CMS EPCS Program is separate from state requirements for e-prescribing for controlled substances.

Getting Started With the CMS EPCS Program in 4 Steps

Step 1: Get Set Up
When: Now

Step 1A: Set up e-prescribing software program

A prescriber issuing e-prescriptions for controlled substances must use an e-prescribing software program that meets all U.S. Drug Enforcement Agency (DEA) requirements. No additional e-prescribing software program is needed to meet the requirement for the CMS EPCS Program.

If the prescriber is new to e-prescribing controlled substances, they need to:
- Contact e-prescribing software program vendors and confirm that their software program meets all DEA requirements. Some e-prescribing software programs can integrate with electronic health records while others run as standalone software programs.
- Complete identity-proofing requirements.
- Obtain two-factor authentication device or set up a two-factor authentication process.
- Configure logical access control.

A prescriber experiencing technical issues when e-prescribing controlled substances should contact their in-house IT support or their e-prescribing software program vendor. Examples of technical issues include login issues related to their username or password, multifactor authentication codes, and prescription transmission errors.

A prescriber doesn't need to register for the EPCS Program or send data to CMS directly.

Remember to check your State laws as you may need additional registration for controlled substance prescriptions and/or need to meet State-specific requirements for e-prescribing for controlled substances.

Step 1B: Verify contact information in PECOS and NPPES

Prescribers should verify and update their mailing and email addresses in the Medicare Provider Enrollment, Chain, and Ownership System (PECOS) and in the National Plan & Provider Enumeration System (NPPES) as soon as possible. CMS uses this information to determine automatic exceptions to the program and to send the non-compliance notice.

Step 1C: Set up HARP account

The Health Care Quality Information System (HCQIS) Access Roles and Profile (HARP) Profile system is a secure identity management portal provided by CMS. Creating a HARP account gives users a user ID and password that can be used to log into the CMS EPCS Prescriber Portal where users can check a prescriber's compliance information, including their compliance status, and submit a waiver application, if needed, for the measurement year. Updated prescriber compliance information is available on the EPCS Prescriber Portal in the fall after the measurement year, after the compliance analysis is complete. Waiver applications are accepted for 60 days from mid-September to mid-November.

Step 2: E-Prescribe Schedule II–V Controlled Substances
When: January 1–December 31 of the measurement year

Use prescribing procedures and workflows supporting e-prescribing for controlled substances while using an e-prescribing software program that meets all DEA requirements. Work with your e-prescribing software program vendor if you have technical issues when e-prescribing such as login issues related to your username or password, multifactor authentication codes, and prescription transmission errors.

Step 3: Review Your CMS EPCS Program Compliance Information On The Portal
When: September after the measurement year

Beginning in August after the measurement year, the CMS EPCS Program automatically calculates prescriber compliance using Medicare Part D claims. The EPCS Program compliance analysis period starts in August after the measurement year to determine which prescribers haven't yet met the program's compliance threshold of e-prescribing at least 70% of their Schedule II–V controlled substance prescriptions under Medicare Part D during the measurement year, after exceptions.

Once the compliance analysis is completed, prescribers can review their program compliance information, including their compliance status, for the measurement year on the CMS EPCS Prescriber Portal. Also during this time, CMS will send the non-compliance notice to prescribers who haven't yet met the program requirement. The notice will be sent by email when possible to available email addresses in PECOS and NPPES and by physical mail if no email address is available. CMS strongly recommends that all prescribers keep their email and mailing addresses accurate and up to date in both systems.

Step 4: Submit a Waiver Application (if needed)
When: September–November after the measurement year ends

Waiver applications may be submitted by prescribers who are non-compliant for the measurement year, or their designated representatives, when circumstances beyond the prescribers' control prevented them from meeting the CMS EPCS Program compliance threshold. The waiver application is available on the CMS EPCS Prescriber Portal in the fall after the measurement year, after the compliance analysis is complete. Prescribers can submit waiver applications for 60 days typically from mid-September to mid-November after the measurement year. Once waiver applications are approved, the CMS-approved waiver exceptions will be granted to prescribers for the entire measurement year.

To receive announcements about the non-compliance notice, when the waiver application submission period is open on the EPCS Prescriber Portal, and submitting waiver applications, subscribe to the CMS EPCS Program Listserv.

For additional information on the program's background, regulations, requirements, and waivers visit the CMS EPCS Program webpage.

Where to Get Help

To learn more about the CMS EPCS Program, visit the CMS EPCS Program webpage. For help, reach out to the Center for Clinical Standards and Quality (CCSQ) Support Central:

- By submitting an online ticket
- Through email
- By calling 1-866-288-8292, Monday–Friday, 8 a.m.–8 p.m. ET
- By calling 711 to reach telecommunications relay services for those who are hearing impaired and for deaf individuals
  - For faster help, try calling outside peak hours, before 10 a.m. and after 2 p.m. ET.

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