CMS EPCS | Electronic Prescribing for Controlled Substances

CMS EPCS Program: Getting Started Quick Reference Guide

How to Use This Guide

Hyperlinks are included throughout the guide to direct the reader to more information and resources.

Overview

What Is Electronic Prescribing for Controlled Substances?

Electronic prescribing for controlled substances refers to prescriber electronically transmit an accurate, error-free, and understandable prescription for controlled substances directly to a pharmacy from the point-of-care. Electronic prescribing for controlled substances has many benefits such as improved patient safety, medication adherence, workflow efficiencies, fraud deterrence, and reduced burden.

CMS EPCS Program Requirements

Section 2003 of the Substance Use-Disorder Prevention that Promotes Opioid Recovery and Treatment for Patients and Communities Act (SUPPORT Act) mandates that Schedule II, III, IV, or V controlled substance prescriptions under Medicare Part D prescription drug plans and Medicare Advantage prescription drug (MA-PD) plans be electronically transmitted. Compliance requirements became effective with the first measurement year (CY 2023). Each subsequent measurement year begins on January 1 and ends on December 31.

Prescribers must electronically prescribe at least 70 percent of their Schedule II, III, IV, or V controlled substances for patients with Medicare Part D, after exceptions. Prescribers will be exempt from this requirement in the following situations:

- Prescribers who issue 100 or fewer qualifying Medicare Part D controlled substance prescriptions in the measurement year.
- Prescribers located in the geographic area of an emergency or disaster declared by a Federal, State, or local government entity. Starting in the 2024 measurement year, CMS will identify which emergencies or disasters qualify for this exception.
- Prescribers who receive a CMS-approved waiver because the prescriber is unable to conduct electronic prescribing of controlled substances due to circumstances beyond the prescriber's control.

Prescriptions written for a beneficiary in a long-term care (LTC) facility will not be included in determining compliance until January 1, 2025.

The CMS EPCS Program is separate from state EPCS program requirements.

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Getting Started with the CMS EPCS Program in 4 Steps

Step 1: Set up electronic prescribing
When: Now

Practitioners issuing electronic prescriptions for controlled substances must use a software application that meets all [Diversion Control Division | Electronic Prescriptions for Controlled Substances (usdoj.gov)](usdoj.gov). No additional e-prescribing software system is needed to meet the requirements for the CMS EPCS Program.

If you are new to electronically prescribing controlled substances, you will need to:
- Contact e-prescribing software vendors and confirm their software applications satisfy the DEA requirements for EPCS. There are e-prescribing software options that can integrate with EHRs or run as standalone software.
- Complete identity proofing requirements.
- Obtain dual (two-factor) authentication device or process.
- Configure logical access control.

Prescribers do not register for the CMS EPCS Program or send data directly to CMS.

Remember to check your state laws—you may need additional registration for controlled substance prescriptions and/or meet state-specific EPCS program requirements.

Step 2: Electronically Prescribe Schedule II, III, IV, or V controlled substance prescriptions
When: During the measurement year

Use prescribing procedures and workflows supporting electronic prescribing for controlled substances while using a software application that meets all DEA requirements. Work with your e-prescribing software vendor if you have technical issues when electronically prescribing such as log-in issues related to username or password, multi-factor authentication codes, or prescription transmission errors.

Step 3: Review your CMS EPCS Program compliance
When: In the Fall after the measurement year ends

The CMS EPCS Program automatically calculates prescriber compliance using Medicare Part D claims.

The CMS EPCS Program compliance analysis will occur after the close of the measurement year to determine which prescribers did not meet the program requirement of electronically prescribing at least 70% of all Schedule II, III, IV, or V controlled substance prescriptions under Medicare Part D during the measurement year, after exceptions.

Once the compliance analysis is completed, CMS will send non-compliance notices to prescribers who have not met the CMS EPCS Program requirements. Notices will be sent by email when possible to available email addresses in the [Medicare Provider Enrollment, Chain, and Ownership System](#)

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(PECOS) and the National Plan and Provider Enumeration System (NPPES), and by regular mail if there is no email address in PECOS or NPPES. CMS strongly recommends that all prescribers keep their email address accurate and up to date in both systems.

Prescribers will also be able to log into an EPCS Prescriber Portal via their Health Care Quality Information Systems (HCQIS) Access Roles and Profile (HARP) account to review their annual compliance status. If you do not have a HARP account, learn about setting one up here: HARP Registration.

Please subscribe to the CMS EPCS Program listserv (click to subscribe) to receive announcements regarding non-compliance notices and how to access the EPCS Prescriber Portal once available.

For additional information on the CMS EPCS Program background, regulations and requirements please visit the CMS EPCS website by clicking HERE

Step 4: Submit a waiver (if appropriate)
When: In the fall after the measurement year ends

Waiver applications may be submitted by prescribers who are non-compliant for the measurement year when circumstances beyond their control prevented them from meeting the CMS EPCS Program requirements. A link to the waiver application will be available on the CMS EPCS Prescriber Portal each Fall following the end of the measurement year after the compliance analysis is complete. Waiver requests will be accepted for 60 days after the non-compliance notices are delivered. Once approved, waivers will be issued for the entire measurement year. Please subscribe to the CMS EPCS Program listserv (click to subscribe) to receive announcements regarding waiver applications.

Where Can I Get Help?

Visit the CMS EPCS website for other help, support information, and to learn more about CMS EPCS Program.

To contact the EPCS Service Center:
- **Click here to create a service center ticket online**
- **Email EPCS-EPrescribe@cms.hhs.gov**
- **Call 1.866.288.8292, Monday through Friday, 8 a.m.–8 p.m. Eastern Time. Hearing impaired dial 711 for TRS Communications Assistant.**

Send CMS feedback about this document.

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