

EPCS 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 is the act of electronically issuing a prescription from the prescriber directly to a pharmacy with the use of electronic health record technology, or other stand-alone electronic prescribing system. Electronic prescribing for controlled substances (EPCS) has many benefits such as improved patient safety, medication adherence, and workflow efficiencies, fraud deterrence, and reduced burden. Section 2003 of the SUPPORT Act mandates that the prescribing of a Schedule II, III, IV, or V controlled substance under Medicare Part D prescription drug plans (Medicare Part D) be done electronically in accordance with an electronic prescription drug program. The first measurement year for compliance with the requirements of the EPCS Program begins January 1, 2023 and ends December 31, 2023.

EPCS Program Requirements

Prescribers must electronically prescribe at least 70 percent of their Schedule II, III, IV, and V controlled substances for patients with Medicare Part D, except in cases where an exception or an approved waiver applies. The CMS EPCS Program is separate from any state EPCS program requirements.

- Prescribers will be exempt from, or particular prescriptions will not be considered for purposes of determining compliance with, this requirement in the following situations: Prescriptions for controlled substances issued when the prescriber and dispensing pharmacy are the same entity.
- Prescribers who issue 100 or fewer qualifying Medicare Part D controlled substance prescriptions per calendar year.
- Prescribers who CMS determines are in the geographic area of an emergency or disaster declared by a Federal, State, or local government entity.
- Prescribers who have received a CMS-approved waiver because the prescriber is unable to conduct electronic prescribing of controlled substances due to circumstances beyond the prescriber's control.

Compliance actions for prescriptions for beneficiaries in a long-term care (LTC) facility will begin January 1, 2025.

Getting Started with the 2023 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 [Drug Enforcement Administration \(DEA\) requirements](#).

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

Step 2: Prescribe Schedule II, III, IV, and V controlled substance prescriptions

When: During 2023

Utilize prescribing procedures and workflows that allow electronic prescribing for controlled substances using a software application that meets all DEA requirements.

Step 3: Review your EPCS compliance

When: Mid-2024

The 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, and V controlled substance prescriptions under Medicare Part D during the measurement year.

Once the compliance analysis is completed, CMS will send notifications of non-compliance to prescribers who are violating the EPCS requirement. Prescribers will also be able to log into an EPCS Dashboard via their Health Care Quality Information Systems (HCQIS) Access Roles and Profile (HARP) account to review their annual compliance status. Please subscribe to the EPCS listserv ([Click to subscribe](#)) to receive announcements regarding non-compliance notifications and accessing the EPCS Dashboard.

If you are not set up with a HARP account, learn about setting one up here: [HARP Registration](#)

Step 4: Submit a waiver (if appropriate)

When: Mid-2024

Waiver applications may be submitted by prescribers who are non-compliant for the measurement year due to extraordinary circumstances. A link to the waiver application will be provided on the CMS EPCS website in 2024 after the 2023 compliance analysis is complete. Waiver requests will be accepted for 60 days after the notifications of non-compliance are delivered. Once approved, waivers will be issued for a period of up to one measurement year. Please subscribe to the EPCS listserv ([Click to subscribe](#)) to receive announcements regarding waiver applications.

Where Can I Get Help?

Visit the [EPKS website](#) for other help and support information and to learn more about EPKS.

View the [Calendar Year 2022 Physician Fee Schedule Final Rule](#). The rule implements Phase 2 of the Section 2003 of the SUPPORT Act.

Contact the EPKS Help Desk at **1-866-288-8292**, Monday through Friday 8 am – 8 pm Eastern Time, or by Email at: EPKS-EPrescribe@cms.hhs.gov.

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