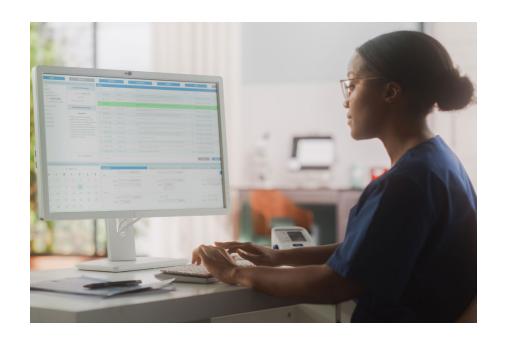
# CMS EPCS Electronic Prescribing for Controlled Substances

# Centers for Medicare & Medicaid Services (CMS) EPCS Prescriber Portal & Waiver Application User Guide



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**DISCLAIMER**: All screenshots include fictitious patients and organizations. Screenshots were captured from a test environment, so there may be slight variations between the screenshots included in this User Guide (including dates) and the current release.

3



### Introduction

#### **CMS EPCS Program Overview**

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 prescribed electronically.

In compliance with the Centers for Medicare & Medicaid Services (CMS) Electronic Prescribing for Controlled Substances (EPCS) Program, prescribers must electronically prescribe at least 70% of their qualifying Schedule II–V controlled substance prescriptions for patients with Medicare Part D, after exceptions, for the measurement year (MY). Each measurement year begins on January 1 and ends on December 31. For more information, please visit the CMS EPCS Program webpage.

#### **Data Availability Timeline**

Compliance data for each measurement year will be available in the CMS EPCS Prescriber Portal starting mid-September in the year following the measurement year. The CMS EPCS Program waiver application submission period starts mid-September and ends mid-November of each year.

#### **CMS EPCS Prescriber Portal**

The CMS EPCS Prescriber Portal is for prescribers of controlled substances under Medicare Part D, and their support staff. This user guide explains how prescribers and their representatives can:

- Access the CMS EPCS Prescriber Portal to view your prescribing and compliance data.
- Submit a waiver application through the EPCS Prescriber Portal.
- Manage your waiver applications.



**Note:** Please verify and update your provider address and email in the Medicare Provider Enrollment, Chain, and Ownership System (<u>PECOS</u>) and National Plan & Provider Enumeration System (<u>NPPES</u>) as soon as possible since prescribers can't update or enter this information in the EPCS Prescriber Portal. CMS uses this information to determine program exceptions and send out non-compliance notices. Any updates to PECOS and NPPES after mid-July may not be reflected in the CMS EPCS Prescriber Portal.

Prescriber compliance data for the measurement year will not be available in the EPCS Prescriber Portal until mid-September the following year.



### **Getting Your HARP Account**

Users will access the CMS EPCS Prescriber Portal by logging in with their Health Care Quality Information Systems (HCQIS) Access Roles and Profile (HARP) account. While prescriber compliance data will not be available until mid-September in the year following the measurement year, CMS suggests that CMS EPCS Program users take **ONE** of the following actions:

- Reset Password: Those who are registered users of the Quality Payment Program
  (QPP) should already have a HARP account; however, a password reset may be
  required to access the EPCS Prescriber Portal. Please note, your HARP account
  password will reset every 60 days if HARP is not accessed during that time.
- Create Account: Those who do not already have a HARP account will be required to create one to access the EPCS Prescriber Portal.

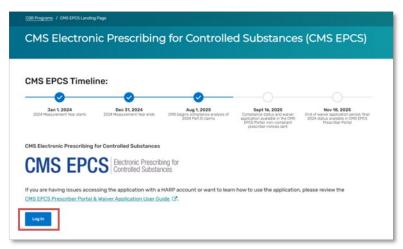
HARP is a secure identity management portal provided by CMS. Creating an account via HARP provides users with a user identification (ID) and password that can be used to sign into many CMS applications. It also provides a single location for users to modify their user profile, change their password, update their challenge question, and add and remove two-factor authentication devices.

- To set up a HARP account, go to the HARP Create an Account webpage.
- To access your HARP account, go to the HARP login page.
- To reset your HARP password, go to the <u>HARP Account Recovery webpage</u>.
- If you have questions, please visit <u>HARP Help</u>.



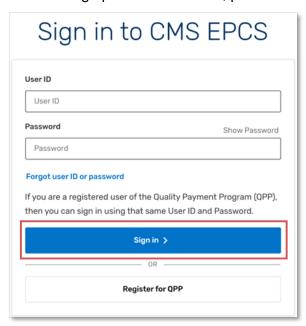
### Signing Into the CMS EPCS Prescriber Portal

- Go to the CMS EPCS Program landing page.
- Click Log In.



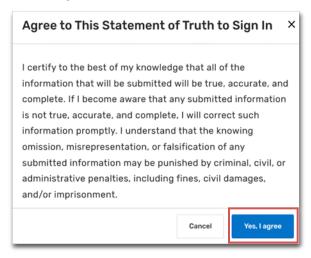
- Sign in with your HARP ID and HARP password.
- Click Sign In.

**Note:** For more information on setting up a HARP account, please visit <u>HARP Help</u>.



An attestation statement will appear.

• To continue, click Yes, I Agree.



The two-factor authentication set up for your HARP account will also be used for this CMS EPCS Prescriber Portal (e.g., email or SMS [text message]).

• Enter your one-time code and click Verify.

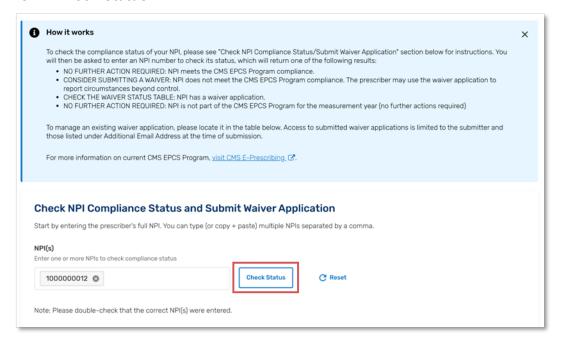




### Looking Up a Prescriber's Compliance Status

From the main page of the CMS EPCS Prescriber Portal, you can view your National Provider Identifier (NPI) compliance status.

- Go to the Check NPI Compliance Status and Submit Waiver Application section.
- Enter the prescriber's NPI into the box.
- Click Check Status.



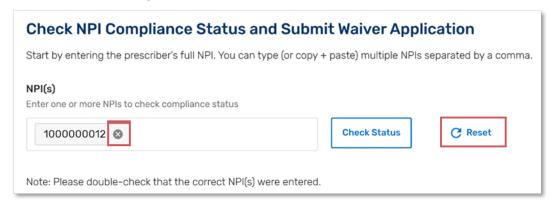


To check the compliance of a different NPI:

Click the X next to the NPI number.

#### OR

Click Reset to the right of Check Status.

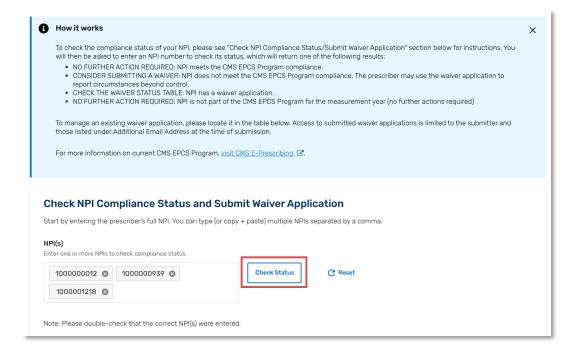




### Looking Up Multiple Prescriber Compliance Statuses

To look up the compliance status of more than one prescriber at once:

- Enter each prescriber's NPI number into the provided field, separating each with a comma. You can also copy and paste your comma-separated list of NPI numbers into the NPI(s) search field.
- Then click Check Status.



**Tip:** If you have a long list of NPI numbers to enter into the NPI(s) field, you can ask Microsoft Copilot, a free online AI assistant, to help you format the list properly and separate each after NPI number with a comma.

- First, go to and log into the Microsoft Copilot website.
- Enter your prompt into the Copilot chat box and then paste the NPI number list you need commas added to. The following is an example of a prompt to enter into Copilot:
  - o Separate each number with a comma:

100000012

1000000939

1000001218

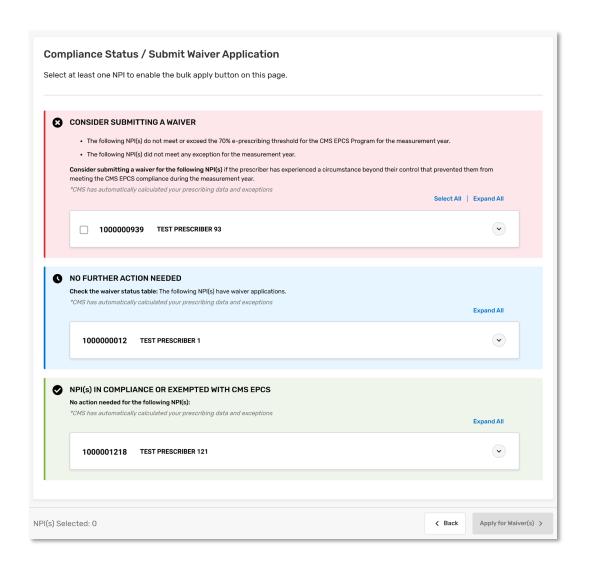


Copilot will generate the NPI number list again with commas added.

• Copy and paste the new list into the NPI(s) field and select Check Status.

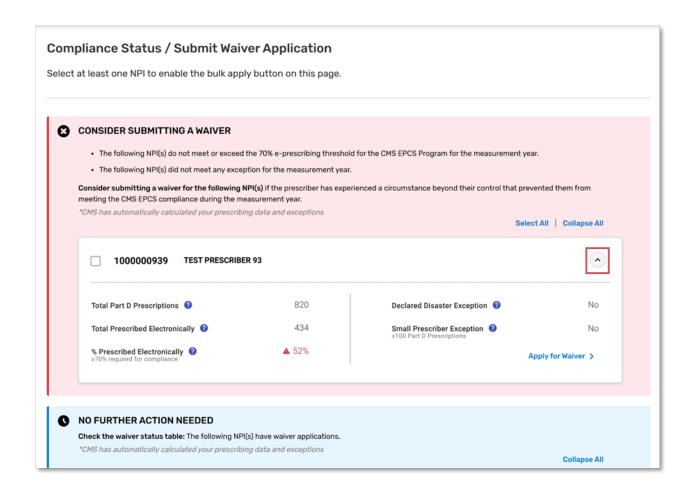
After looking up the compliance statuses for multiple prescribers, each prescriber will be sorted into different compliance status boxes indicating each prescriber's compliance status for the measurement year.

 Review the contents of the boxes to confirm that they include the correct NPI number and name for each prescriber.



After you confirm each prescriber's NPI number and name:

 Click the down arrow next to each prescriber's name to reveal the prescriber's compliance data.





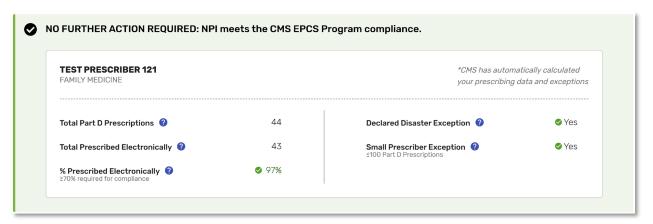
### **Interpreting Prescriber Compliance Statuses**

Next, you will see one of the following boxes that indicates your status. For prescribers who are part of the CMS EPCS Program, the boxes contain the prescriber's name, taxonomy (specialty), prescribing data, and exceptions. You can hover over the blue question mark icons for more information about the prescribing data and exceptions. The following are four examples of the colored boxes that you will find describing compliance status, according to your NPI.

**Note:** Throughout the EPCS Prescriber Portal, there are blue question marks that can be interacted with to provide the user with an explanation of the associated terms, see a list of these terms in Appendix A.

#### **Prescriber Is Compliant**

Example 1: Green Box—No Further Action Required: NPI meets the CMS EPCS Program compliance.



A Green Box indicates the NPI met at least one of the following compliance criteria:

- At least 70% of Medicare Part D Schedule II–V controlled substances were prescribed electronically
- Has been provided a declared disaster exception
- Has been provided a small prescriber exception

Example 2: Blue Box—No Further Action Required: NPI (1000001358) is not part of the CMS EPCS Program for the measurement year (no further actions required).

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

The Example 2 Blue Box indicates that the NPI is not part of the CMS EPCS Program for the measurement year. This may occur when a prescriber did not issue any qualifying Schedule II–V controlled substance prescriptions under Medicare Part D or when a prescriber wrote prescriptions only for beneficiaries in a long-term care facility during the measurement year.

#### **Prescriber Is Non-Compliant**

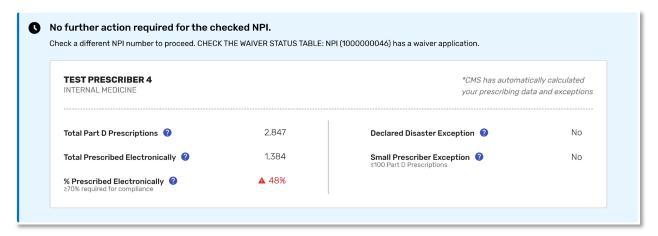
Example 3: Red Box—Consider Submitting a Waiver: NPI (1000000939) does not meet the CMS EPCS Program compliance.

Please consider submitting a waiver application for meeting the CMS EPCS Program compliance durin	•	s experienced a circumstance beyond control that preven	nted the prescriber f
TEST PRESCRIBER 93 FAMILY MEDICINE		*CMS has automatically calculated your prescribing data and exceptions	
Total Part D Prescriptions 🔞	820	Declared Disaster Exception ②	No
Total Prescribed Electronically 🔞	434	Small Prescriber Exception   ≤100 Part D Prescriptions	No
% Prescribed Electronically 270% required for compliance	▲ 52%		

A **Red Box** indicates the NPI does not meet the EPCS Program requirement in the measurement year. The prescriber may use the waiver application to report additional circumstances beyond the prescriber's control.

**Note:** See the <u>Submitting a Waiver Application section</u> of this user guide for more information.

Example 4: Blue Box—No further action required for the checked NPI.



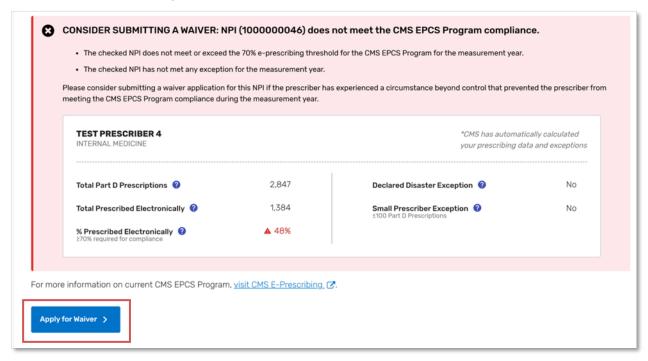
The Example 3 **Blue Box** indicates the NPI orginally had a non-compliant **Red Box** status but has submitted a waiver application. Note that a **Blue Box** status doesn't mean that the waiver application has been approved. For details on where to monitor the status of a waiver application, visit the Managing CMS EPCS Program Waiver Applications section of this guide.

### Submitting a Waiver Application

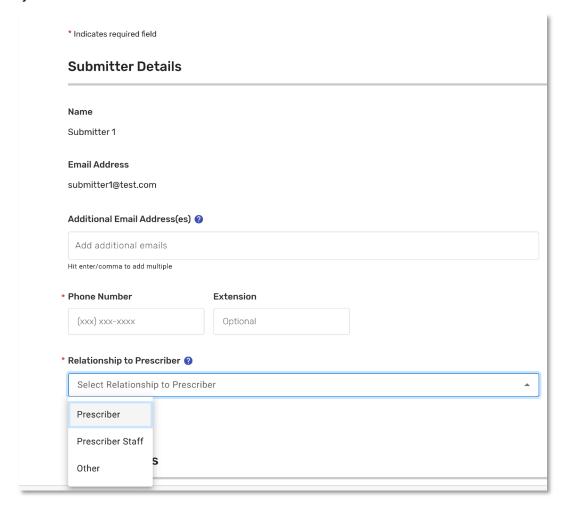
Each prescriber who experienced extraordinary circumstances beyond their control that prevented them from meeting the CMS EPCS Program requirement during the measurement year has the opportunity to submit a waiver application.

Click Apply for Waiver.

**Note:** This button will only appear for NPIs with a **Red Box**.

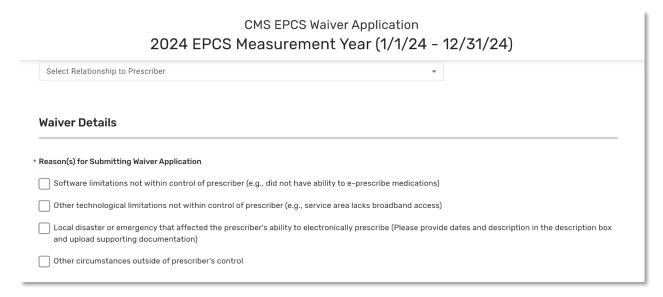


 Under Submitter Details, fill in the appropriate information. Note that your name and email address will be filled out already and will match the information associated with your HARP account.



- Under Waiver Details, fill in the appropriate information.
- Select the Reason(s) for Submitting Waiver Application (required).

Note: Users can select up to four reasons for submitting a waiver application.

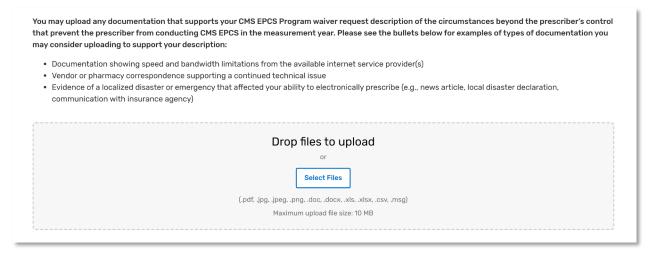


• Enter a detailed explanation documenting your circumstances in the box (required; 30–5000 characters).

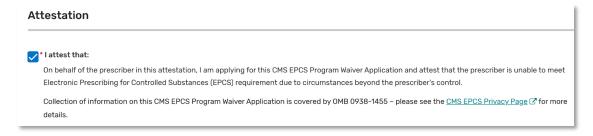
escriber from meeting the CMS EPCS Pr	ogram requirement:	
Enter description here		

To upload supporting documents that support the waiver application, click Select Files
and select the desired files from your computer (optional but highly recommended).

**Note:** Uploads are encouraged but not required. Multiple files may be uploaded at one time, but the maximum file size is 10 MB. You may also be asked to provide additional supporting documents during the waiver application review process, so it's important to keep all supporting documents until after the waiver application has been approved.



- Review the attestation.
- Click the box next to "\* I attest that."



After all required fields are completed, you will have three options:

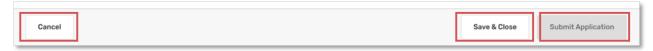
Click Cancel to leave the waiver application. The waiver application will not be saved.

#### OR

Click Save & Close to save your progress and come back to complete it later. This
option will not submit your waiver application.

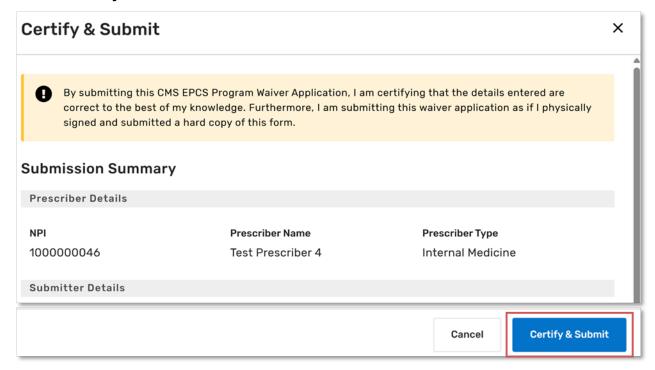
#### OR

Click Submit Application to submit your waiver application. The Submit Application
option will be grayed out until all required sections are complete.



If you click **Submit Application** from the step above, a new window will open.

- Scroll down to review the waiver summary.
- Click Certify & Submit.

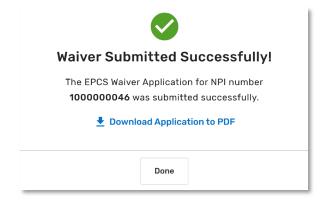


After submitting your waiver application, you will receive a confirmational email from <u>EPCS-EPrescribe@cms.hhs.gov</u>.



Once CMS has reviewed your waiver application, you will receive another email from <u>EPCS-Eprescribe@cms.hhs.gov</u> with the status of your waiver application (i.e., approved or denied).

You will then see the "Waiver Applications Submitted Successfully!" screen with the prescriber's NPI number listed.





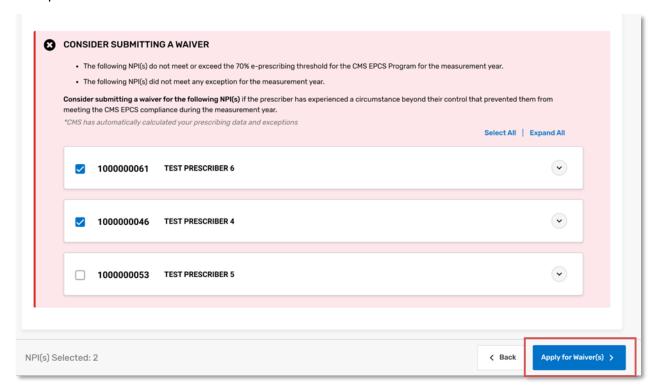
### Submitting a Waiver Application for a Group of Prescribers

This section shows how to use the bulk waiver application submission feature to submit a single waiver application for a group of prescribers who are considered non-compliant with the program. If after looking up multiple prescribers you see the non-compliant **Red Box** status that says:

#### **CONSIDER SUBMITTING A WAIVER**

- The following NPI(s) do not meet the 70% e-prescribing threshold for the CMS EPCS Program for the measurement year.
- The following NPI(s) did not meet any exception for the measurement year."
- Check the box next to each prescriber's NPI number that you would like to include in the group waiver application.

**Note:** Each prescriber included in the group waiver application must have the same reason or reasons for submitting a waiver application. You can't select a different reason or reasons for each prescriber.

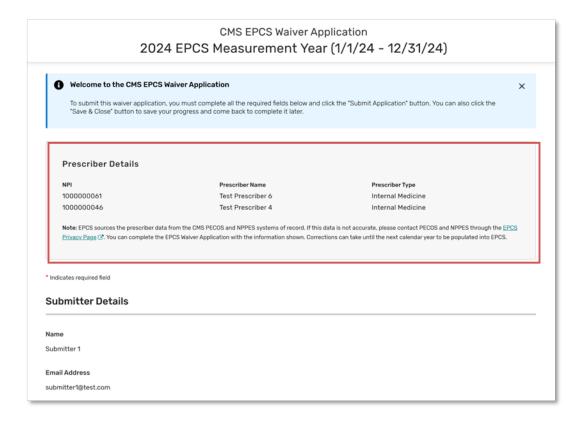




Next, click Apply for bulk waiver to fill out a single waiver application for multiple
prescribers. The rest of the information you will include in the group waiver application
will be the same as the information you include in a waiver application for a single
prescriber.

**Note:** Make sure you have all the information you need to submit the waiver application, including any supporting documents you'd like to upload, if needed, to support the waiver application. For a group waiver application, you must submit the waiver application before logging out of the EPCS Prescriber Portal. Once submitted, waiver applications cannot be edited. If changes are required, the waiver application must be withdrawn and a new one must be filled out and submitted. If you don't submit the waiver application before logging out, you'll have to start the waiver application over. The bulk waiver application submission feature doesn't have a Save & Close button to allow you to save your progress in the waiver application and come back to complete it later.

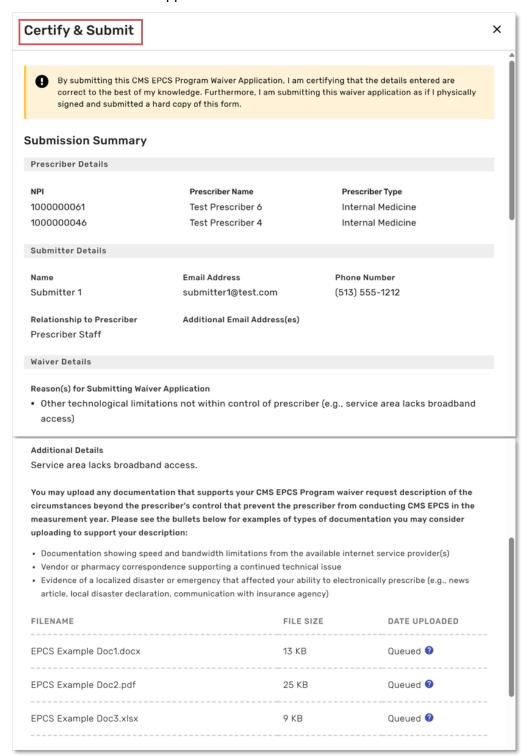
After submitting a waiver application for more than one prescriber, the screen will look as follows:



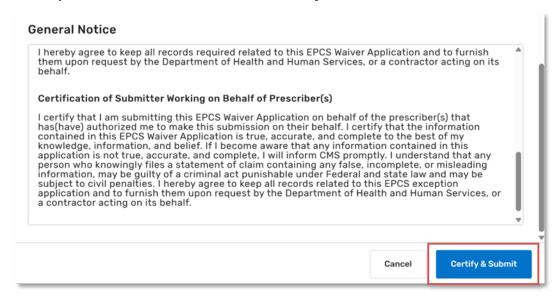
The box shows the prescriber NPI numbers for which a waiver application has been submitted.

- Confirm that these are the correct prescriber NPI numbers and names.
- Then fill out the form as shown in the Submitting a Waiver Application section.

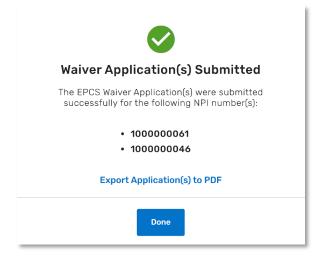
 After you fill out all the required sections, click Submit Application. The Certify & Submit screen will then appear.



- Review and confirm the information for the group of prescribers in the submission summary.
- Once you confirm the information, click Certify & Submit.



After submitting the group waiver application, you should see the "Waiver Application(s) Submitted" screen with each included prescriber's NPI number listed.

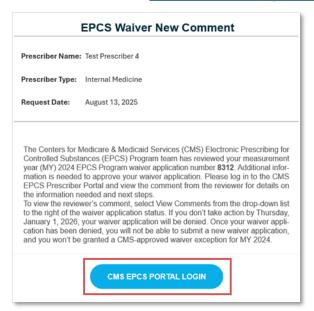




## Receiving and Responding to Additional Information Requests

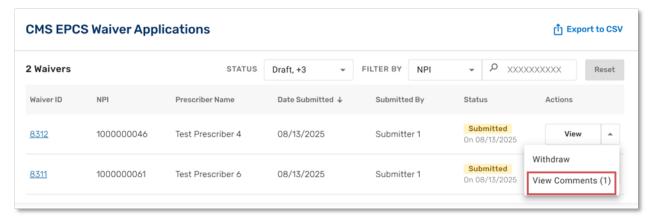
Sometimes, a waiver application reviewer may require additional information from you before they can make a final decision on whether to approve or deny the waiver application. This additional information could include more details on the circumstances beyond the prescriber's control that prevented them from meeting the program requirement for the measurement year. You may also be asked to provide additional supporting documents, so it's important to keep all supporting documents until after the waiver application has been approved.

If the reviewer requires additional information, they'll request it through the comment feature in the CMS EPCS Prescriber Portal. If you receive a comment through the EPCS Prescriber Portal, you'll receive an email notification from <a href="mailto:EPCS-EPrescribe@CMS.HHS.gov">EPCS-EPrescribe@CMS.HHS.gov</a>.



The email will prompt you to log into the EPCS Prescriber Portal to view and respond to the comment. The email also includes the number for the waiver application the reviewer requested additional information for, instructions on how to find comments in the EPCS Prescriber Portal, and the date by which you'll need to respond to the reviewer's comment and provide the requested additional information or follow the reviewer's other instructions.

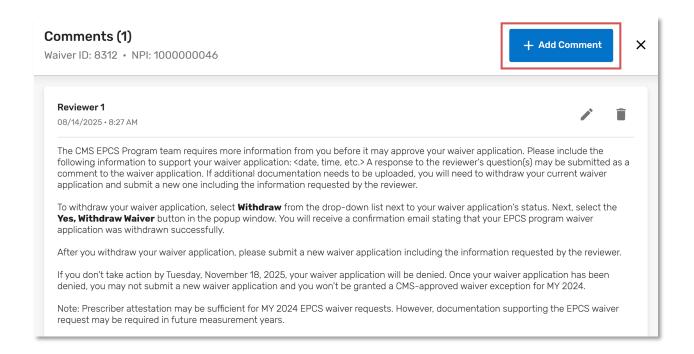
- Review the details in the email carefully, including the application number, date, and any specific instructions provided by CMS.
- Go to the CMS EPCS Prescriber Portal by clicking CMS EPCS PORTAL LOGIN.
- Once you're in the EPCS PRESCRIBER Portal: Navigate to the CMS EPCS Waiver Application section and locate the waiver application you received a comment for.



- Click the down arrow next to the waiver application status.
- Then select "View Comments" from the drop-down list. This opens the waiver application's Comment window with the reviewer's notes.

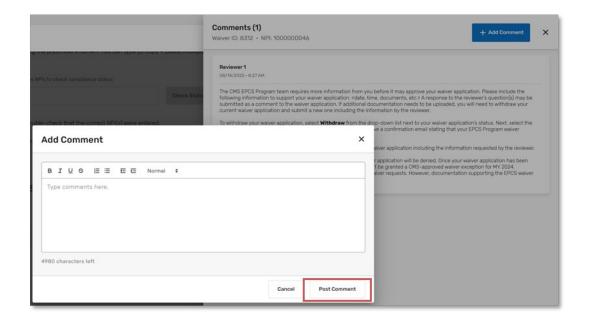


- Review the comment to understand what information you need to provide. You may be asked to provide specific dates, times, or other details related to your waiver application.
- Click Add Comment to open the Add Comment window and respond to the reviewer's comment accordingly.



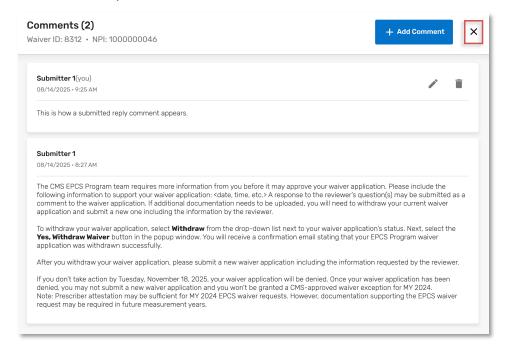
Once you're satisfied with your comment, click Post Comment to submit your response.





**Note:** You won't be able to upload any supporting documentation through the comment feature. If the reviewer requests that you supply supporting documentation, you'll need to withdraw your current waiver application and submit a new one in which you've uploaded the supporting documentation.

 To exit the Comments window and return to the CMS EPCS Waiver Applications screen, click the X at the top of the window.



**Note:** If the reviewer doesn't receive a response from you by the provided deadline, your waiver application will be denied automatically. Once your waiver application has been denied, you won't be able to submit another one and be granted a CMS-approved waiver exception for the measurement year.

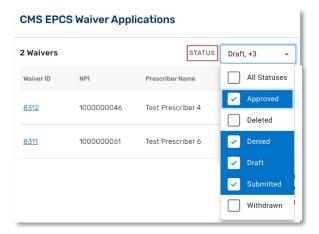


### Managing CMS EPCS Program Waiver Applications

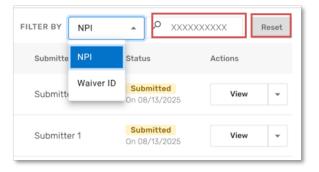
The CMS EPCS Waiver Applications section of the CMS EPCS Prescriber Portal allows you to view waiver applications. The waiver applications shown in this section are limited to waiver applications you submitted or waiver applications where you are listed as an Additional Email Address.

You can filter the CMS EPCS Waiver Applications in two ways:

1. Filter by Status to find waiver applications with a specific status. Waiver application statuses include: approved, deleted, denied, draft, submitted, and withdrawn.



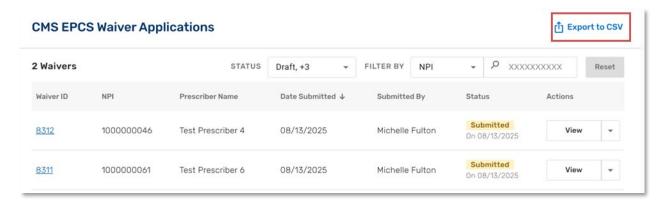
- 2. Filter by NPI or Waiver ID to find waiver applications associated with a specific NPI or Waiver ID.
  - Enter the NPI or Waiver ID to find a waiver application.
  - Click Reset to clear the NPI or Waiver ID.



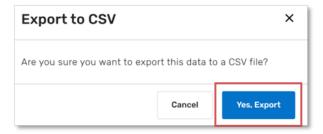
You can sort the CMS EPCS Waiver Applications in ascending (↑) or descending (↓) order by clicking on one of the following column headers: Waiver ID, NPI, Prescriber Name, Date Submitted, Submitted By, or Status.

**Note:** The waiver applications are automatically sorted in descending order ( $\downarrow$ ) by the Date Submitted column (e.g., most recent waiver applications are listed first).

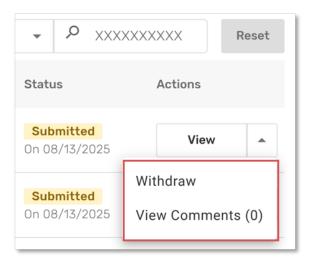
Export all your waiver application data to CSV by clicking Export to CSV. This step is
useful for group practices with multiple prescriber waiver applications.



 Click Yes, Export to start the CSV file download automatically. Open CSV files using spreadsheet software (e.g., Microsoft Excel).



For each waiver application in the table, you have two options in the Actions column: View and Withdraw.



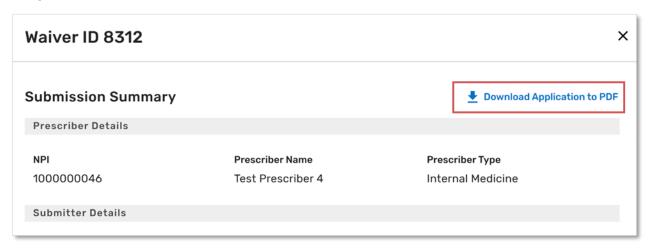
### **Viewing a Waiver Application**

 Click View from the Action column to open a box with information associated with the waiver application.

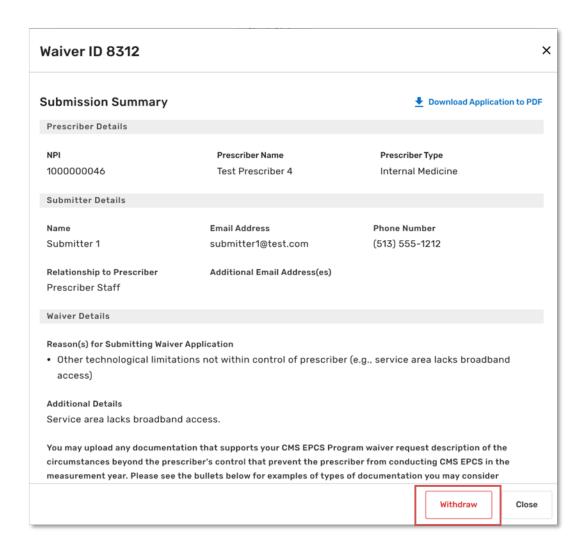
#### From this View window:

 Click Download Application to PDF (top right) to download the waiver application to PDF.

OR

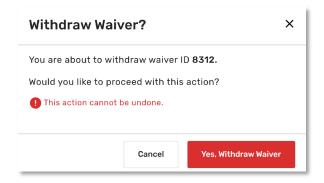


• Click **Withdraw** (bottom left) to withdraw the waiver application.



### Withdrawing a Waiver Application

- Click Withdraw from the Actions column or Withdraw in the View window to withdraw a
  waiver application. A Withdraw Waiver? box will pop up.
- Click Yes, Withdraw Waiver to withdraw the waiver application.

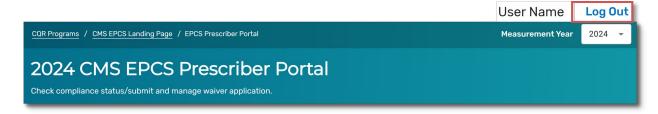


You will receive an email from <u>EPCS-EPrescribe@cms.hhs.gov</u> confirming that your waiver application has been withdrawn successfully.

**Note:** Once you withdraw the waiver application, it and any information you submitted previously will be deleted permanently and can't be viewed or downloaded.

### Logging Out of the CMS EPCS Prescriber Portal

When you are done using the CMS EPCS Prescriber Portal, click **Log Out** and exit the webpage.





### **Getting Help and Support**

CMS is committed to providing support and resources to prescribers included in the CMS EPCS Program. Look for information here:

#### **CMS EPCS Program Webpage**

The <u>CMS EPCS Program webpage</u> is the centralized location for resources and updates for prescribers.

### **CMS EPCS Program Listserv**

The <u>CMS EPCS Program listserv</u> is an email announcement from CMS that helps keep prescribers informed of CMS EPCS Program updates and upcoming deadlines.

### **CCSQ Support Central**

For additional help, reach out to the Center for Clinical Standards (CCSQ) Support Central:

- By submitting an online ticket
- Through emailing EPCS-EPrescribe@cms.hhs.gov
- By calling 1-866-288-8292, Monday–Friday, 8 a.m.– 8 p.m. ET
- By calling 711 to reach a telecommunications relay services communications assistant 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.



### Appendix A: Blue Question Marks

Throughout the CMS EPCS Prescriber Portal, there are blue question marks that can be interacted with to provide the user with an explanation of the associated terms, see list of terms below:

#### **NPI Compliance Status**

- Total Part D Prescriptions: The total number of Medicare Part D Schedule II–V controlled substance prescriptions found in Part D claims during the measurement year using the prescription number and the prescriber NPI. Prescriptions are counted using the prescription number assigned at the pharmacy, with each unique number counted once per measurement year. Refills using the same prescription number are not counted unless they are the first occurrence of the number in the measurement year. Refer to the most recent Physician Fee Schedule (PFS) final rule for compliance information about prescriptions written for a beneficiary in a long-term care facility.
- Total Prescribed Electronically: The total number of electronically transmitted Medicare Part D Schedule II–V controlled substance prescriptions found in Part D claims during the measurement year using the Prescription Origin Code, the prescription number, and the prescriber NPI. Prescriptions are counted using the prescription number assigned at the pharmacy, with each unique number counted once per measurement year. Refills using the same prescription number are not counted unless they are the first occurrence of the number in the measurement year. Refer to the most recent PFS final rule for compliance information about prescriptions written for a beneficiary in a long-term care facility.
- % Prescribed Electronically (≥70% required for compliance): Total Prescribed Electronically divided by the Total Part D Prescriptions, represented as a percentage.
- Declared Disaster Exception: The NPI has been provided an exception from the EPCS
   Program because they were located in the geographic area of a declared disaster.



• Small Prescriber Exception (≤100 Part D Prescriptions): The NPI has been provided an exception from the EPCS Program because they issued 100 or fewer Medicare Part D Schedule II–V controlled substance prescriptions filled in the measurement year. Prescriptions are counted using the prescription number assigned at the pharmacy, with each unique number counted once per measurement year. Refills using the same prescription number are not counted unless they are the first occurrence of the number in the measurement year. Refer to the most recent PFS final rule for compliance information about prescriptions written for a beneficiary in a long-term care facility.

#### **CMS EPCS Program Waiver Application**

- Additional Email Address(es): Email addresses entered here will also have full access to the waiver application and receive email notifications related to this waiver application.
- Relationship to Prescriber: You must select your relationship to the prescriber you are submitting the waiver application for. If you select "Other," you must describe your relationship in the displayed entry field.

### Appendix B: Release Notes

Update Date	Release Notes
September 16, 2025	Updated draft version of this user guide (V2.0) Applicable to
	measurement year 2024. Updated screenshots for MY 2024.
	Removed reference to National Public Health Emergency. Added
	multi-NPI lookup and bulk waiver application screenshots.