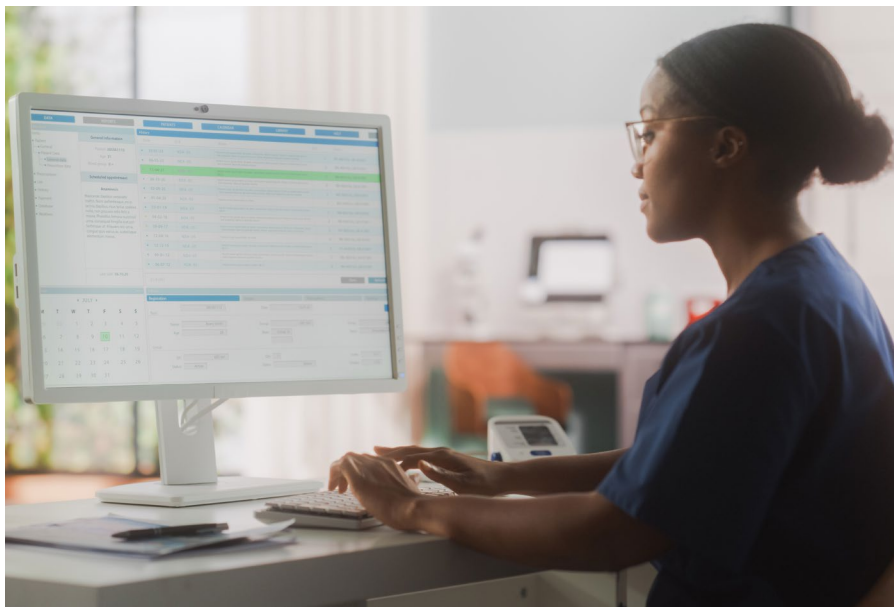# CMS EPCS | Electronic Prescribing for Controlled Substances

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

Contents

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.

Prescriber Portal & Waiver Application User Guide v1.0, Released 04/26/2024
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2

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 electronically transmitted.

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 Schedule II-V controlled substances for patients with Medicare Part D, after exceptions. This compliance requirement became effective with the first 2023 measurement year. Each subsequent measurement year begins on January 1 and ends on December 31. For more information, please visit the program website at https://www.cms.gov/medicare/e-health/eprescribing/cms-eprescribing-for-controlled-substances-program.

Data Availability Timeline

Compliance data for each measurement year will be available in the CMS EPCS Prescriber Portal starting September in the year following the measurement year (e.g., 2023 measurement year data available in September 2024). CMS EPCS waiver applications will be open from September through 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 portal, and
- Manage your waiver applications.

Important Note: Please verify and update your provider address and email in the Medicare Provider Enrollment, Chain, and Ownership System (PECOS) and National Plan & Provider Enumeration System (NPPES) as soon as possible. CMS uses this information to determine program exceptions and send out non-compliance notices. Any updates to PECOS and NPPES after July 26 may not be reflected in the CMS EPCS Prescriber Portal.

Prescriber data for the measurement year will not be available in the portal until September in the following year.

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3

Getting Your HARP Account

Users will access the CMS EPCS Prescriber Portal by logging in via their HCQIS Access Roles and Profile (HARP) Account. While prescriber data will not be available until September in the year following the measurement year, CMS suggests that CMS EPCS users take **ONE** of the following actions:

1) **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 CMS EPCS Prescriber Portal. Please note, your HARP account password will reset every 60 days if HARP is not accessed during that time.
2) **Create Account:** Those who do not already have a HARP account will be required to create one to access the CMS 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 **HARP Register**.
- To access your HARP account, go to **HARP Login**.
- To reset your HARP password, go to **HARP Account Recovery**.
- If you have questions, please visit **HARP Help**.

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4

Signing into the CMS EPCS Prescriber Portal

- Go to the **Clinician Quality Reporting (CQR) website:** **https://cqr.cms.gov/**.
  - Click **Visit EPCS**.

WELCOME TO
Clinician Quality Reporting (CQR)

CQR Programs

Quality Payment Program

Quality Payment
PROGRAM

The Quality Payment Program (QPP) was authorized by the Medicare Access and CHIP Reauthorization Act of 2015 (MACRA), which ended the Sustainable Growth Rate formula that would have resulted in a significant cut to payment rates for clinicians participating in Medicare. MACRA advances a forward-looking, coordinated framework for clinicians to participate in the Quality Payment Program, which rewards value in 1 of 2 ways:

- Merit-based Incentive Payment System (MIPS): Clinicians who participate in MIPS are subject to a performance-based payment adjustment on charges under the Physician Fee Schedule.
- Advanced Alternative Payment Models (APMs): Clinicians who participate in an Advanced APM and achieve certain thresholds may be eligible for higher payment rates under the Physician Fee Schedule.

Visit QPP

CMS Electronic Prescribing for Controlled Substances

CMS EPCS | Electronic Prescribing for Controlled Substances

The CMS EPCS Program helps address the opioid crisis by requiring that prescribers issuing Schedule II-V controlled substance prescriptions covered under Medicare Part D prescription drug plans transmit those prescriptions electronically to the pharmacy. All prescribers of controlled substances covered under Part D are included in the program regardless of their Medicare participation status. The first measurement year for the program began on January 1, 2023.

Visit EPCS

- The CMS EPCS landing page will appear.
  - Click **Log In**.

CQR Programs / CMS EPCS Landing Page

CMS Electronic Prescribing for Controlled Substances (CMS EPCS)

CMS EPCS Timeline:

Jan 1, 2023	Dec 31, 2023	Aug 1, 2024	Sept 16, 2024	Nov 18, 2024
2023 Measurement Year starts	2023 Measurement Year ends	CMS begins compliance analysis of 2023 Part D claims	Compliance status and waiver application available in the CMS EPCS Portal; non-compliant prescriber notices sent	End of waiver application period; final 2023 status available in CMS EPCS Prescriber Portal

ℹ **Update**

The COVID-19 Public Health Emergency (PHE) has been extended into the 2023 Measurement Year. Due to this extension, all prescribers are exempted from EPCS requirements. Please navigate to the CMS EPCS Program page ⧉ for additional information. Proceed to review the prescriber's compliance result. If the COVID-19 PHE is the only reason for meeting compliance, CMS recommends the prescriber to apply for a waiver if the prescriber experienced extraordinary circumstance(s). Although the COVID-19 PHE indicates that an exception has been made, we encourage prescribers to apply for a waiver if they also experienced additional extraordinary circumstances; this data will not affect the National Provider Identifier (NPI) compliance status for the measurement year but will contribute to improving the user experience for future program years.

CMS Electronic Prescribing for Controlled Substances

CMS EPCS | Electronic Prescribing for Controlled Substances

Prescribers or their designated representatives can log in to the CMS EPCS Prescriber Portal using their HARP account credentials. Once in the portal, users can review prescriber annual compliance status, automatic exception status, or apply for a waiver for the measurement year.

Log In

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5

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

  Note: For more information on setting up a HARP account, please visit: https://harp.cms.gov/login/help.

Sign in to CMS EPCS

User ID

User ID

Password   Show Password

Password

Forgot user ID or password

If you are a registered user of the Quality Payment Program (QPP) then you can sign into CMS EPCS using that same User ID and Password.

Sign in >

— OR —

Register for QPP

- An attestation statement will appear.
  - To continue, click **Yes, I Agree**.

Agree to This Statement of Truth to Sign In ✕
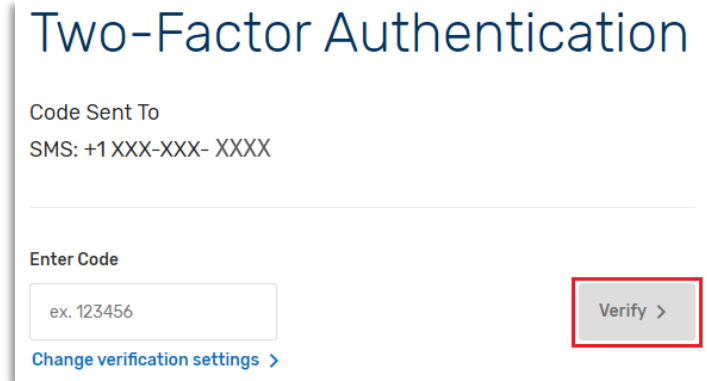
I certify to the best of my knowledge that all of the information that will be submitted will be true, accurate, and complete. If I become aware that any submitted information is not true, accurate, and complete, I will correct such information promptly. I understand that the knowing omission, misrepresentation, or falsification of any submitted information may be punished by criminal, civil, or administrative penalties, including fines, civil damages, and/or imprisonment.

Privacy and security statement:

This warning banner provides privacy and security notices

Cancel   Yes, I agree

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6

- The two-factor authentication set up for your HARP account will also be used for this portal (e.g., email or SMS [text message]).
    - Enter your one-time code and click **Verify.**
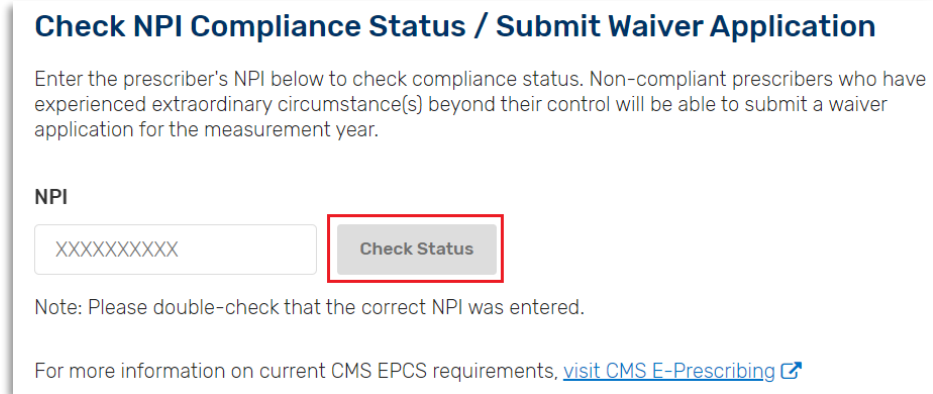
Viewing National Provider Identifier (NPI) Compliance Status

From the main page of the CMS EPCS Prescriber Portal, you can view your NPI compliance status.

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

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 color boxes that you will find describing compliance status, according to your NPI.

Note: Throughout the 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.

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7

- **Example 1: Green Box** – No Further Action Required: NPI meets the CMS EPCS Program requirement.

  - 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, and/or
    - has been provided a Small Prescriber Exception.

- **Example 2: Red Box** – Consider Submitting a Waiver.

  - A **Red Box** indicates the NPI meets the EPCS requirement in measurement year 2023 due to the declared national disaster/s (e.g., COVID-19) only. The prescriber may use the waiver application to report additional circumstances beyond control.

    Note: See the **Submitting a Waiver** section of this user guide for more information.

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8

- **Example 3: Blue Box** – No further action required for the checked NPI.

  - The Example 3 **Blue Box** indicates the NPI orginally had a **Red Box** but has submitted a waiver application.

- **Example 4: Blue Box** – No Further Action Required: NPI is not part of the CMS EPCS Program….

  - The Example 4 **Blue Box** indicates the NPI is not part of the CMS EPCS Program for the measurement year.

- To check the compliance of a different NPI:
  - Click **X** next to the **Check Status** button,

    OR

  - Click **Reset** to the right of the Check Status button.

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9

Submitting a Waiver

Non-compliant prescribers who have experienced extraordinary circumstance(s) beyond their control should consider submitting a waiver application for the measurement year.

- Click **Apply for Waiver.**
  - This button will only appear for NPIs with a **Red Box**.

> ❌ **CONSIDER SUBMITTING A WAIVER:** NPI (1000000400) meets the CMS EPCS Program requirements only because they received a national Public Health Emergency (COVID-19) exception. The prescriber may use the waiver application to report additional circumstances beyond control.
>
> - The checked NPI does not meet or exceed the 70% threshold for EPCS for the measurement year.
> - The checked NPI has the following exceptions during the measurement year: **Public Health Emergency (PHE) – COVID-19**
>
> **Please consider applying for a waiver for this NPI** if the prescriber has experienced an extraordinary circumstance that prevented them from meeting EPCS Requirements during the measurement year. CMS recommends the prescriber to apply for a waiver if the prescriber experienced extraordinary circumstance(s). Although the COVID-19 PHE indicates that an exception has been made, we encourage prescribers to apply for a waiver if they also experienced additional extraordinary circumstances; this data will not affect the NPI compliance status for the measurement year but will contribute to improving user experience for future program years.
>
> **TEST PRESCRIBER 40**
> INTERNAL MEDICINE
>
> **CMS has automatically calculated your prescribing data and exceptions*
>
> | | | |
> |---|---|---|
> | Total Part D Prescriptions ❓ | 7,760 | Public Health Emergency (PHE) Exception ❓ ✅ Yes |
> | Total Prescribed Electronically ❓ | 4,138 | Declared Disaster Exception ❓   No |
> | % Prescribed Electronically ❓ ≥70% required for compliance | ⚠ 53% | Small Prescriber Exception ❓ ≤100 Part D Prescriptions   No |

For more information on current CMS EPCS requirements, visit CMS E-Prescribing ↗

Apply for Waiver >

- Review **Prescriber Details** for accuracy.

CMS EPCS Waiver Application
2023 EPCS Measurement Year (1/1/23 – 12/31/23)

> ℹ **Welcome to the CMS EPCS Waiver Application**   ✕
>
> To submit this waiver application, you must complete all the required fields below and click the "Submit Application" button. You can also click the "Save & Close" button to save your progress and come back to complete it later.

Prescriber Details

NPI
1000000400

Prescriber Name
Test Prescriber 40

Prescriber Type
Internal Medicine

Note: EPCS sources the above prescriber data from the CMS PECOS and NPPES systems of record. Also, CMS PECOS and NPPES are also the systems of record for disasters and notifications. If this data is not accurate, please contact PECOS and NPPES using the information on the EPCS Privacy Page. Please proceed with the completion of the EPCS Waiver Application at this time as the corrected information may not be populated into EPCS until the next calendar year.

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10

CMS EPCS | Electronic Prescribing for Controlled Substances

- Under **Submitter Details**, fill in the appropriate information.

  1. Review **Name** and **Email Address** for accuracy.
  2. Enter **Additional Email Address(es)** (optional).
     – Additional email address entered will receive an emailed copy of the waiver application/status and can see the waiver in the **CMS EPCS Waiver Application** section, if the email is associated with their HARP account.
     – If you are submitting a waiver on behalf of a prescriber, consider adding another prescriber email in the additional email address field.
  3. Enter your **Phone Number** (required).
  4. Select your **Relationship to Prescriber** (required).
     – If **Other** is selected, describe your role in the free text box.

  *Indicates required field

  Submitter Details

  Name
  Submitter 1

  Email Address
  submitter1@test.com

  Additional Email Address(es) ❓

  [Add additional emails]
  Hit enter/comma to add multiple

  • Phone Number   Extension
  [(xxx) xxx-xxxx]   [Optional]

  • Relationship to Prescriber ❓

  [Select Relationship to Prescriber ▲]

  Prescriber
  Prescriber Staff
  Other

- Under **Waiver Details**, fill in the appropriate information.

  5. Select the **Reason(s) for Submitting Waiver Application** (required).
     – Users can select both reasons for submitting a waiver application.
  6. Enter a detailed explanation documenting your circumstances in the box (required; 30-500 characters).

  Waiver Details

  • Reason(s) for Submitting Waiver Application

  ☐ Technological limitations not within control of the prescri... service area lacks broadband internet access, and/or software vendor did not install ne... ystem for conducting EPCS).

  ☐ Other circumstances outside of prescriber's control.

  • In the box below, please provide a detailed explanation of the technical or other circumstances beyond the prescriber's control that prevented the prescriber from meeting the CMS EPCS Program requirement:

  [Enter description here]

  500 characters allowed

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11

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

   Note: Uploads are encouraged, but not required. Multiple files may be uploaded at one time, but the maximum file size for each file is 10MB.

You may upload any documentation that supports your CMS EPCS Program waiver request description of the circumstances beyond the prescriber's control that prevent the prescriber from conducting EPCS in the measurement year. Please see the bullets below for examples of types of documentation you may consider uploading to support your description:

- Documentation showing speed and bandwidth limitations from the available internet service provider(s)
- Vendor or pharmacy correspondence supporting a continued technical issue
- Evidence of a localized disaster or emergency that affected your ability to electronically prescribe (e.g., news article, local disaster declaration, communication with insurance agency)

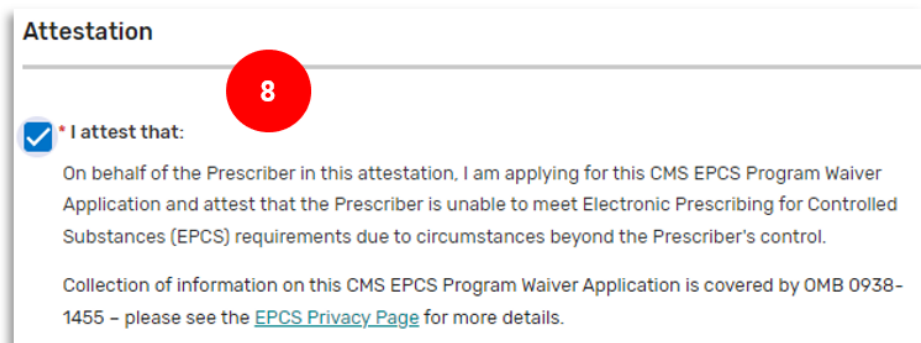Drop files to upload

or

Select Files

(.pdf, .jpg, .jpeg, .png, .doc, .docx, .xls, .xlsx, .csv, .msg)

Maximum upload file size: 10 MB
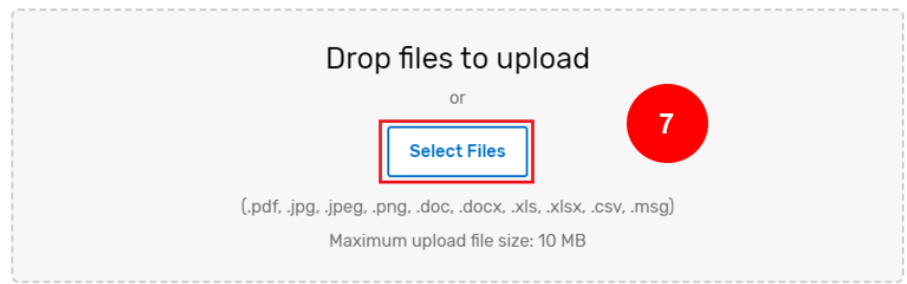
- Review the attestation.
  – Click the box next to *** I attest that**….

Attestation

☑ *** I attest that:**

On behalf of the Prescriber in this attestation, I am applying for this CMS EPCS Program Waiver Application and attest that the Prescriber is unable to meet Electronic Prescribing for Controlled Substances (EPCS) requirements due to circumstances beyond the Prescriber's control.

Collection of information on this CMS EPCS Program Waiver Application is covered by OMB 0938-1455 – please see the EPCS Privacy Page for more details.

- After all required fields are completed, you will have three options:
  – Click **Cancel** to leave your waiver application. Your application will NOT be saved.

Cancel

OR

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12
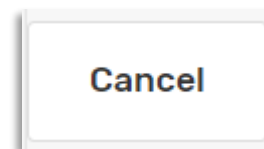
‒ Click **Save & Close** to save your progress and come back to complete it later.

  o This option will NOT submit your waiver application.

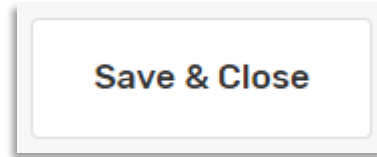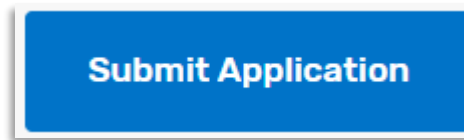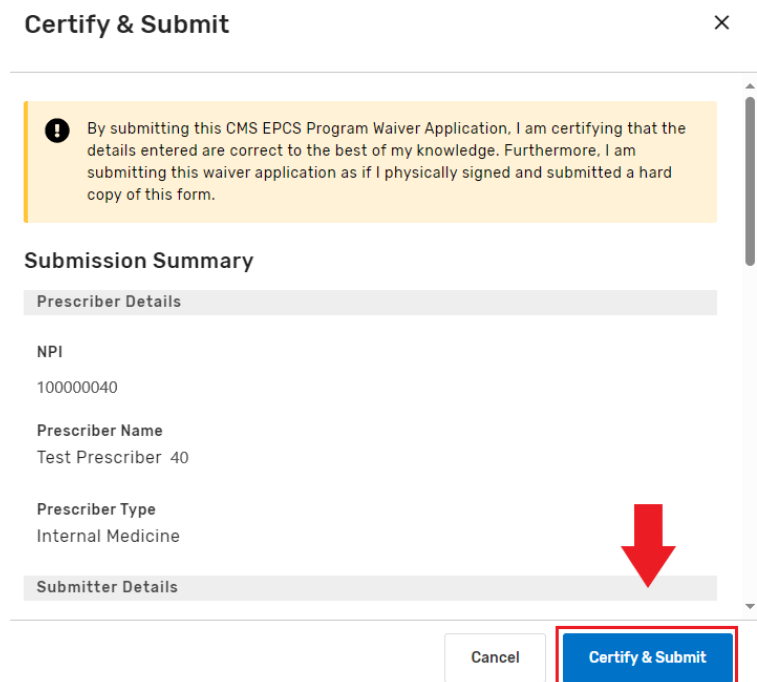**Save & Close**

OR

‒ Click **Submit Application** to submit your waiver application.

Submit Application

  o **Submit Application** option will be greyed 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 EPCS-EPrescribe@cms.hhs.gov.

Certify & Submit   ✕

⚠ By submitting this CMS EPCS Program Waiver Application, I am certifying that the details entered are correct to the best of my knowledge. Furthermore, I am submitting this waiver application as if I physically signed and submitted a hard copy of this form.

Submission Summary

Prescriber Details

NPI
100000040

Prescriber Name
Test Prescriber 40

Prescriber Type
Internal Medicine

Submitter Details

Cancel   **Certify & Submit**

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

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13

Managing CMS EPCS Waiver Applications

The **CMS EPCS Waiver Applications** section allows you to view CMS EPCS Program waivers. The waivers shown in this section are limited to waivers you submitted or waivers where you are listed as an Additional Email Address.

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

    – Filter by **Status** to find waivers with a specific status.

      Waiver statuses include:
      Approved, Deleted, Denied, Draft, Submitted, and Withdrawn.
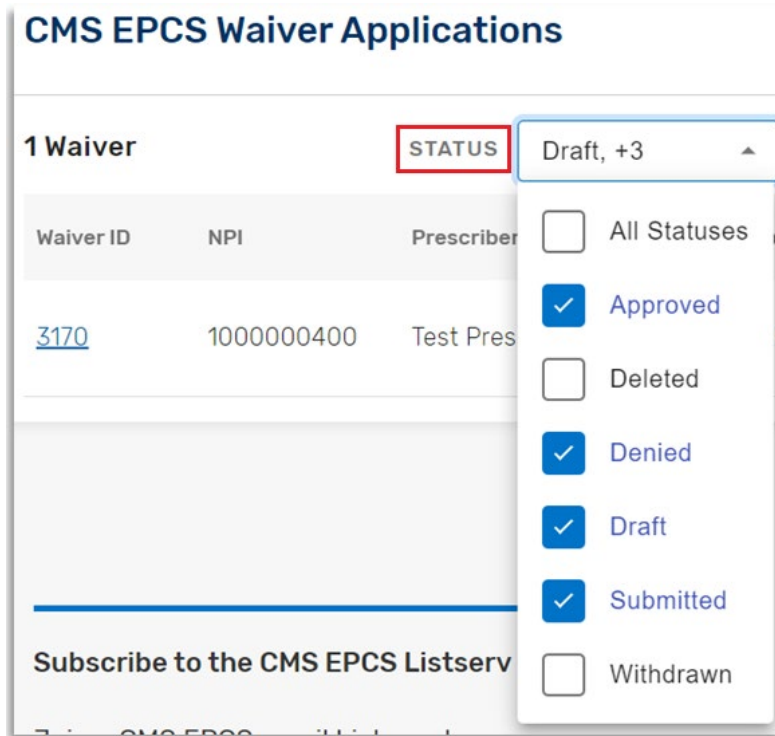
    – Filter by **NPI** or **Waiver ID** to find waivers associated with a specific NPI or Waiver ID.
        a. Enter the NPI or Waiver ID to find waiver.
        b. Click **Reset** to clear the NPI or Waiver ID.

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14
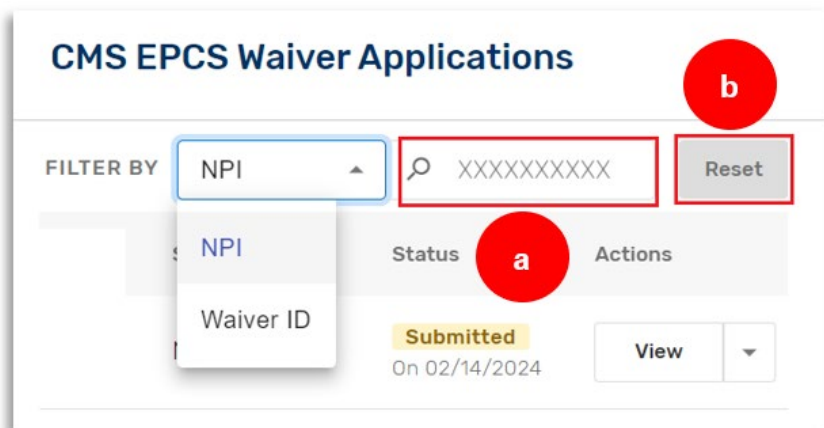
- You can sort the CMS EPCS Waiver Applications in ascending (↑) or descending (↓) order by clicking on one of the following column headers: **Waiver ID, NPI, Prescriber Name, Date Submitted, Submitted By,** or **Status**.
  - Note: The waiver applications are automatically sorted in descending order (↓) by the **Date Submitted** (e.g., most recent waiver requests are listed first).

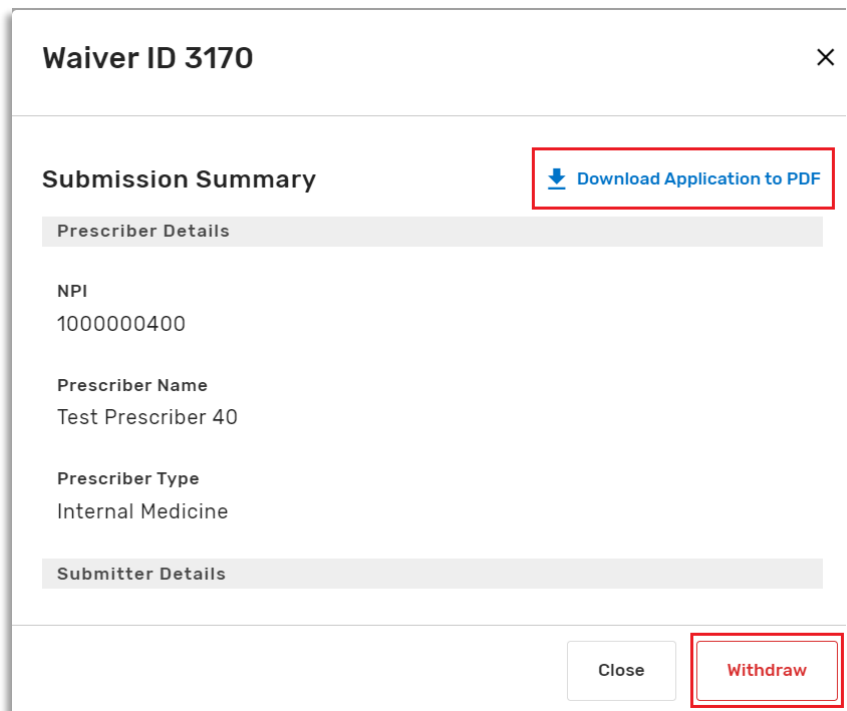- For each waiver in the table, you have two options in the **Actions** column: **View** and **Withdraw**.
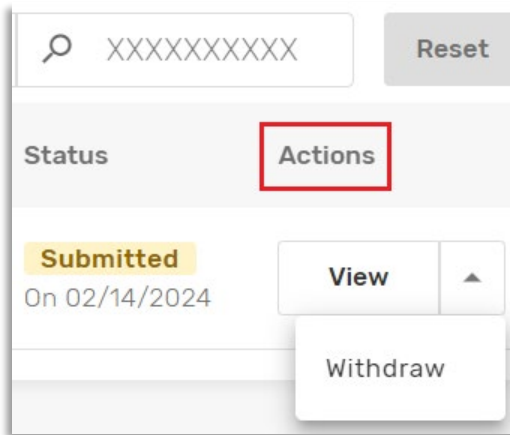
- Clicking **View** from the Action column opens a box that includes information associated with the waiver.
  - From this **View** window, you will also be able to download the waiver information to PDF by clicking on **Download Application to PDF** (top right) or withdraw the application by clicking on **Withdraw** (bottom right).

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15

– Clicking **Withdraw** from the Actions column or the View pop-up box will allow you to withdraw a waiver application.

   o A new box will pop up and you will need to click on **Yes, Withdraw Waiver** to withdraw the waiver.

   o You will receive an email from EPCS-EPrescribe@cms.hhs.gov confirming that your waiver has been withdrawn successfully.
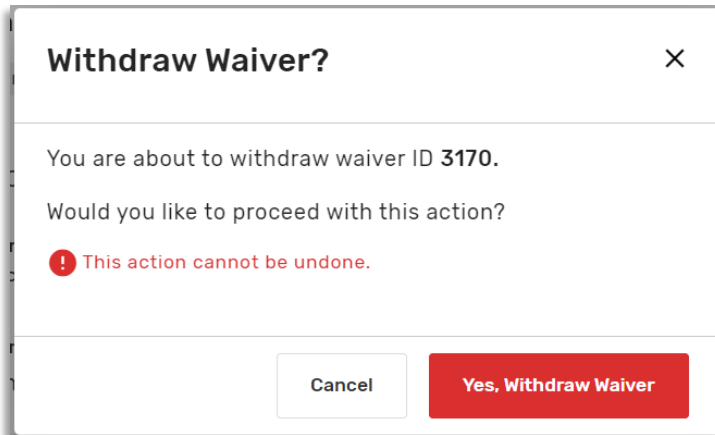
• You can export all your waiver data to CSV by clicking on **Export to CSV**.

   – This step is useful for group practices with multiple prescriber waiver applications.
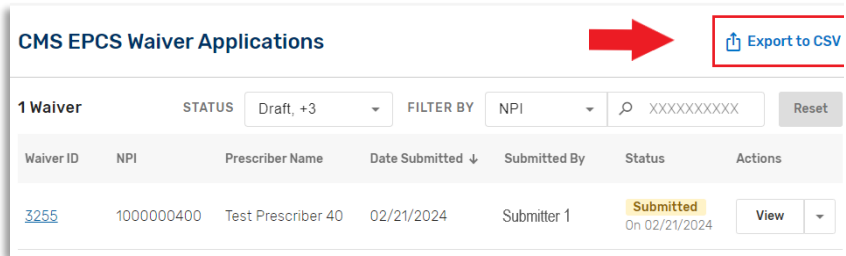
   – When you click **Yes, Export**, the CSV file download will start automatically. Open CSV files using spreadsheet software (e.g., MS Excel, etc.)
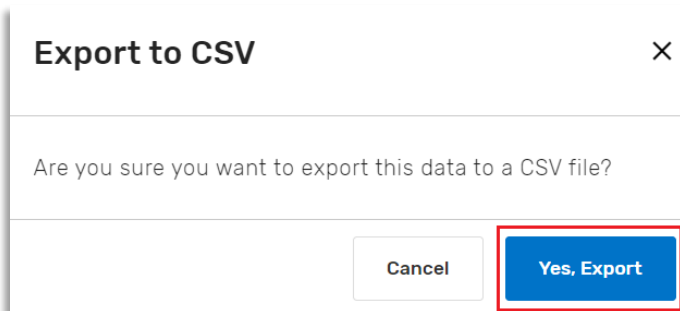
Withdraw Waiver? ✕

You are about to withdraw waiver ID **3170**.

Would you like to proceed with this action?

⚠ This action cannot be undone.

[Cancel]   [Yes, Withdraw Waiver]

CMS EPCS Waiver Applications   ⬆ Export to CSV

1 Waiver   STATUS [Draft, +3 ▾]   FILTER BY [NPI ▾]   🔍 XXXXXXXXXX   [Reset]

Waiver ID	NPI	Prescriber Name	Date Submitted ↓	Submitted By	Status	Actions
3255	1000000400	Test Prescriber 40	02/21/2024	Submitter 1	Submitted On 02/21/2024	View ▾

Export to CSV ✕

Are you sure you want to export this data to a CSV file?

[Cancel]   [Yes, Export]

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16

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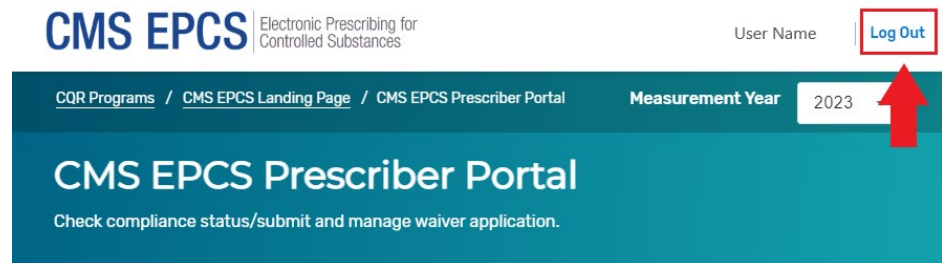
Getting Help and Support

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

CMS EPCS Program Website

The CMS EPCS Program website is the centralized location for resources and updates for clinicians. Visit the program website at https://www.cms.gov/medicare/e-health/eprescribing/cms-eprescribing-for-controlled-substances-program

CMS EPCS Program Listserv

The CMS EPCS Program listserv is an email announcement from CMS that helps keep prescribers informed of CMS EPCS Program updates and upcoming deadlines. Join the CMS EPCS listserv at https://public.govdelivery.com/accounts/USCMS/subscriber/new?topic_id=USCMS_13022.

Contact the CMS EPCS Service Center

To contact the CMS EPCS Service Center:

- Visit the following site to create a service center ticket online: https://cmsqualitysupport.servicenowservices.com/ccsq_support_central
- Email EPCS-EPrescribe@cms.hhs.gov
- Call 1.866.288.8292, Monday through Friday, 8 a.m.– 8 p.m. Eastern Time (ET). For those who are hearing impaired, please dial 711 for TRS Communications Assistant.
    - To receive assistance more quickly, please consider calling during non-peak hours—before 10 a.m. and after 2 p.m. ET. Customers who are hearing impaired can dial 711 to be connected to a TRS Communications Assistant.

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17

Appendix A: Blue Question Marks

Throughout the 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.

- **National Public Health Emergency (PHE) Exception:** The NPI has been provided an exception from the EPCS Program due to a national public health emergency, such as COVID-19, as determined by the Secretary of the Department of Health and Human Services.

- **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 Waiver Application

- **Additional Email Address(es):** Email addresses entered here will also have full access to the waiver and receive email notifications related to this waiver.

- **Relationship to Prescriber:** You must select your relationship to the party you are submitting the CMS EPCS waiver application for. If you select "Other," you must describe your relationship in the displayed entry field.

Prescriber Portal & Waiver Application User Guide v1.0, Released 04/26/2024
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18

Appendix B: Release Notes

Update Date	Release Notes
April 26, 2024	First version of this User Guide (v1.0). Applicable to measurement year 2023, compliance data and waiver application available on September 16, 2024.

Prescriber Portal & Waiver Application User Guide v1.0, Released 04/26/2024
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19