



## CMS EPCS Program Guidance Regarding the Role of the Pharmacy/Pharmacist

Electronic prescribing for controlled substances (EPCS) has many benefits, such as improved safety, clinician/patient ease of use, medication adherence, workflow efficiencies, fraud deterrence, and reduced burden. In compliance with section 2003 of the <u>SUPPORT Act</u>, beginning January 1, 2023, CMS began to monitor prescribers for compliance with the EPCS Program. To be considered compliant, at least 70 percent of a prescriber's controlled substance (Schedule II-V) prescriptions under Medicare Part D must be transmitted electronically each measurement year, after exceptions such as those for small prescribers and prescribers with an address in the geographic area of an emergency or disaster are applied.

To assure beneficiary access, we are outlining the role of pharmacies and pharmacists in the implementation of the CMS EPCS Program. Consistent with SUPPORT Act requirements and CMS's 2022 and 2023 Physician Fee Schedule Final Rules:

- 1. There are **no** compliance requirements for pharmacists or pharmacies in the CMS EPCS Program, as all compliance requirements are limited to prescribers of controlled substances under Medicare Part D.
- 2. A pharmacist is **not** required or otherwise obligated to verify that a prescriber has a "waiver" from the CMS EPCS Program prior to dispensing a controlled substance under Medicare Part D.
- 3. A pharmacist is **not** required or otherwise obligated to verify that a prescriber or prescription qualifies for an exception from the CMS EPCS Program requirements prior to dispensing a controlled substance under Medicare Part D.
- 4. The CMS EPCS Program does **not** limit or impede in any way pharmacists or pharmacies from dispensing covered Part D drugs including controlled substances from valid written, oral or faxed prescriptions that are consistent with current laws and regulations, including state EPCS mandates or Drug Enforcement Agency (DEA) requirements.

These are important protections for Medicare beneficiaries that will ensure continued and timely access to needed medications.

### What EPCS support resources are available?

- The <u>EPCS website</u> will provide a centralized location for resources and updates for prescribers
- The EPCS listserv will provide general program updates and upcoming deadlines as they are available; prescribers can sign up at <u>CMS Listserv</u>
- The <u>EPCS Service Center</u> will serve as the primary point of contact to help address questions. v

# **EPCS**

#### CONTACT US

- 1-866-288-8292
- EPCS-EPrescribe@cms.hhs.gov
- Hearing impaired dial 711 for TRS Communications Assistant.

### HOURS

Monday-Friday 8 a.m.-8 p.m. ET

Non-peak hours are before 10 a.m. and after 2 p.m. ET