CMS EPCS | Electronic Prescribing for Controlled Substances

2025 Measurement Year CMS EPCS Program Requirements At-A-Glance

What is measured

- The CMS EPCS Program measures qualifying Medicare Part D Schedule II–V controlled substance prescriptions filled January 1–December 31, 2025.
- The program uses Medicare Part D claims data to calculate prescriber compliance.*
- Prescriber must be in compliance if they issued controlled substance prescriptions under Medicare Part D in measurement year 2025, regardless of Medicare participation status.
- Prescriptions written for a beneficiary in a long-term care facility will not be included in determining compliance until January 1, 2028.

* Prescribers don't need to report any data to CMS.

Exceptions

- Prescribers who issue 100 or fewer qualifying prescriptions for Schedule II–V controlled substances under Medicare Part D during measurement year 2025*
- Prescribers in the geographic area of a disaster or an emergency as determined by CMS*
- Prescribers who submit an application for and receive a CMS-approved waiver for the 2025 measurement year because they were unable to meet the program requirement due to circumstances beyond their control**

* CMS automatically applies this exception.

** Prescribers must wait for their compliance data to become available on the CMS EPCS Prescriber Portal in fall 2026 to submit a waiver application.

Compliance Requirement

- Prescribers electronically prescribe at least 70% of their qualifying prescriptions for Schedule II–V controlled substances under Medicare Part D

OR

- Prescribers qualify for and receive an automatic exception from CMS

OR

- Prescribers submit an application for and receive a CMS-approved waiver for the measurement year.

Checking My Compliance

- Each prescriber considered non-compliant for the 2025 measurement year will receive a non-compliance notice in fall 2026.
- Each prescriber can check their compliance status and submit a waiver application for measurement year 2025 on the CMS EPCS Prescriber Portal in fall 2026.