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Requirement for Electronic Prescribing for Controlled Substances (EPCS) for a Covered Part D Drug Under a Prescription Drug Plan or an MA– PD Plan (CMS-10834)

Comment On: CMS-2025-0964-0001

Requirement for Electronic Prescribing for Controlled Substances (EPCS) for a Covered Part D Drug Under a Prescription Drug Plan or an MA–PD Plan (CMS-10834)

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Comment on CMS-2025-0964-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I support CMS’s proposal to require electronic prescribing for controlled substances Under Medicare Part D and MA-PD plans. I have experience working on policy related to drug use, where I've studied how monitoring systems can help reduce prescription fraud.

This comment relates to CMS’s proposed rule to require prescribers to use digital systems for controlled substances. It aims to improve monitoring and modernize Medicare’s oversight practices.

This proposed electronic prescribing can be very helpful in reducing fraud and human errors compared to paper systems. Guilcher et al.’s research shows promising results in the use of electronic systems. I agree with the outcomes expected by CMS to reduce fraud; however, I think that an addition should be considered to help prescribers implement this infrastructure.

I recommend that the CMS provides assistance for technology and finances for providers who may struggle with the transition. I also recommend a phased transition to make it easier for smaller providers with less resources.

In conclusion, this rule is a good step toward reducing fraud and improving safety. I strongly support CMS’s proposal, but recommend that the agency pair it with support for the providers it impacts.