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DATE: September 6, 2024

TO: All Medicare Advantage, Cost, PACE, Demonstration, and Prescription Drug Plan Organizations

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SUBJECT: HPMS Complaints Tracking Module Application Programming Interface

On October 31, 2024, CMS will implement an application programming interface (API) option for the HPMS Complaints Tracking Module (CTM). This API will provide an alternative method for downloading beneficiary complaints and uploading plan casework resolutions.

CMS will administer pilot testing for the CTM API from **September 16, 2024 through September 27, 2024**. This opportunity is available to all plans and to consultants and third-party vendors that are sponsored by a contracted plan organization.

Participation in the CTM API pilot is voluntary and is not required to implement the API now or in the future.

Organizations that choose to participate in this pilot should reference the instructions below.

New HPMS Sandbox Website

CMS has established a new HPMS sandbox website (<https://hpmssandbox.cms.gov>) that will remain operational in support of ongoing plan testing activities following the pilot period.

CMS is planning to migrate all plan testing (e.g., PDPFS API, OEC API, and the PBP sandbox module) to this new website. However, we are restricting its use to the CTM API pilot currently.

CMS will provide more information regarding the overall migration to the HPMS sandbox website under separate cover.

Obtaining Access for the CTM API Pilot

All participating plans, consultants, and third party vendors must use the HPMS API Key Management module **on the HPMS plan testing sandbox website** to request, generate, and manage HPMS API keys for the CTM API pilot. Once granted access to the sandbox

website (<https://hpmssandbox.cms.gov>), a user will use the same CMS user ID and password as used on the production HPMS website.

An organization's designated responsible user must submit the API key requests in the module, where they must identify a technical point of contact (POC). The technical POC must also have HPMS access. Further, these users must have access to the applicable contract number(s) and the CTM module.

Please refer to the HPMS API Key Management User Guide located in the Documentation section of the publicly available HPMS landing page (<https://hpms.cms.gov>) for guidance on obtaining access to the API Key Management module, requesting a new API key, and managing API keys. The CTM API Documentation will be available in the same section of the landing page.

Note: The HPMS API Key Management User Guide is written for the production website, but the technical guidance also applies to the module as it resides on <https://hpmssandbox.cms.gov>.

For other user access-related instructions (e.g., how to obtain a new CMS user ID and how to request consultant access, if applicable), please refer to: <https://www.cms.gov/about-cms/information-systems/hpms/user-id-process>.

Please direct questions regarding the HPMS API Key Management module to the HPMS Help Desk at either hpms@cms.hhs.gov or 1-800-220-2028.

For API technical support, please contact hpmstechsupport@softrams.com. The HPMS Help Desk will not provide this level of technical assistance.

Additional Guidance on the CTM API

Below are some additional points regarding this process:

- One or more API keys may be requested from CMS.
 - Each API key is associated with a responsible party user. Conversely, one responsible party can be associated with multiple API keys.
 - Each API key is associated with a defined set of contract numbers.
- An API key may not be transferred to another individual.
- If the user loses access to the CTM module or contract number(s), they must request a new API key.
- If an organization participates in the CTM API pilot, they will need to request new API key(s) to use the CTM API in the production environment. Keys issued via the HPMS sandbox website may not be used on production.

- The development and operation of an API is by definition “technical.” Consequently, it is critical that technical resources with API experience be involved.
- The official letter may be signed by an individual deemed by the organization to have the necessary authority. Some examples may include an officer of the company (e.g., CEO, COO, or CFO) or a department manager.

API Security Best Practices

- The API secret should be restricted to the responsible party for each key. This individual is responsible for ensuring the security of the secret key. It must not be shared with other staff and should be stored in a location that is only accessible to the user’s machine.
 - If more than one user requires access using a single key, then create a service that provides the designated users with an authorization token only. With this approach, the user does not need to know the secret, but will be able to perform the action.
- The API key ID can be shared with internal partners with a need to utilize the new API.
- The API key ID and secret will rotate periodically. New IDs and secrets will be reissued automatically at that time.
 - Contract assignments and other authorization components will not be affected.
- If a key is compromised, the responsible party must deactivate the key immediately.

Changes Required for Pilot Participation

Pilot organizations must make the following changes to successfully import the plan download file:

- The column header CMS_ISSUE_CHANGE_REQUESTS has been updated to CMS_LEAD_CHANGE_REQUESTS.
- There has been an addition of the 'SWIFT' and 'SWIFT control number' columns between the CONGRESSIONAL_INFORMATION and AGENT_BROKER columns.

Preparation for the Production Release

CMS will implement the production CTM API during the evening of October 31, 2024. The CTM scope will also become available in the HPMS API Key Management production module at this time, which will allow organizations to request production API keys.

For questions regarding the CTM API pilot process, please contact Kristy Holtje at Kristy.holtje@cms.hhs.gov.