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DATE: June 25, 2020

TO: All Part D Plans

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SUBJECT: Contract Year (CY) 2021 Part D Pricing File Submission Application
Programming Interface (API)

Beginning with CY 2021, CMS will provide Part D sponsors and their contracted third party vendors and consultants with an additional mechanism for submitting Part D pricing files to HPMS for display on Medicare Plan Finder (MPF). Sponsors may continue to submit pricing files by uploading files via the Part D Pricing File Submission (PDPFS) module; alternatively, sponsors may submit pricing files via a new application programming interface (API).

CMS conducted a PDPFS API pilot in May and June 2020 with participants that volunteered in response to our February 11, 2020 memo, "Health Plan Management System Application Programming Interface Testing Opportunity - Responses Due by February 19, 2020." Regardless of participation in the pilot, the new PDPFS API will be available for use by all authorized Part D sponsors and contracted third party vendors and consultants beginning with the CY 2021 Part D pricing file test submissions in early July 2020.

This memo, which supplements the guidance set forth in the June 3, 2020 HPMS memo entitled "Contract Year (CY) 2021 Part D Pricing Data Submission Guidance," provides detailed information on the new API mechanism.

API Background

An application programming interface, or API, provides an interface that allows two pieces of software or systems to communicate with each other. HPMS will follow the Partner API release policy, where the API is shared only with users that have access to HPMS.

In the case of the Part D pricing files, the API can be used to set up protocols to submit the pricing files automatically to HPMS on a scheduled basis, without an individual physically logging into the HPMS website. To accomplish this, a Part D sponsor or contracted industry partner would be responsible for developing an API to: (1) send the drug pricing files to the PDPFS API, and (2) call the PDPFS API to determine the status of the submitted drug pricing files. **Appendix A** provides further information on these processes.

Obtaining Access to the PDPFS Production API

A Part D sponsor or contracted industry partner must establish one or more responsible parties to obtain access to the PDPFS API. The responsible party may be a direct employee of the Part D sponsor or a contracted consultant or third party vendor individual. This user will be:

- Considered the owner of the API contract between CMS and the organization;
- Associated with PDPFS API transactions in the HPMS database (i.e., API submissions will be affiliated with this individual's CMS user ID and name); and
- Responsible for the security of the secret key. Additional details are provided in the **API Security Best Practices** section of this memo.

To establish access to the PDPFS API, each responsible party must:

1. Own an active CMS-issued EUA user ID with HPMS access;
2. Have the API-participating contract number(s) assigned to the CMS user ID in HPMS;
3. Have active submission access in the HPMS PDPFS module for the API-participating contract number(s);
4. Submit a signed, official letter that establishes the individual's role as a responsible party for the PDPFS API for the applicable contract number(s). The letter must include the following:
 - a. Name of the responsible party
 - b. CMS user ID
 - c. Organization name
 - d. Contract number(s) that will use the API
 - e. API scope (i.e., PDPFS)
 - f. Contact information for the technical point of contact that will be developing and managing the API on the organization's behalf
 - i. Name
 - ii. Organization name
 - iii. Email address
 - iv. Phone number
 - g. ***Applicable only to requests from consultant or third party vendors*** - Include a statement attesting that the responsible party has already established the required consultant access to the PDPFS module for the listed contract number(s).
5. Submit the letter to Julia.Heeter@cms.hhs.gov with a copy to hpmstechsupport@softrams.com. The subject line must state: PDPFS API REQUEST

CMS will verify that the responsible party meets all of the criteria listed above, including that the user has established the required consultant access, where applicable. The API key(s) will then be issued to the responsible party once the request has been fully processed.

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.
- If an organization participated in the PDPFS API pilot, please note that new keys must be issued for the production API by means of the request process described above.
- The development and operation of an API is by definition technical. Consequently, it is critical that technical resources with API experience be involved.
- To establish a responsible party or modify an existing one (e.g., add contracts to the API), use the same process as described above.
- 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.

In the fall of 2020, CMS anticipates the release of a new API Management module in HPMS, which will replace this manual process. When that new module becomes available, CMS will provide further guidance under separate cover.

API Security Best Practices

- The API secret should be restricted to only 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 inform CMS immediately so that the key can be deactivated.
- If needed, CMS can deactivate and reissue a new secret at the request of the Part D sponsor.

Technical Support

Appendix A contains a detailed technical guide for establishing and using the new PDPFS API, covering topics such as requesting an authorization token to connect to the API, developing the API (e.g., code snippets), and error messaging.

For technical assistance with the PDPFS API, please contact hpmstechsupport@soframs.com.

The HPMS Help Desk cannot provide technical assistance with the API.

Frequently Asked Questions

CMS has compiled the following list of frequently asked questions (FAQ) resulting from the PDPFS API pilot:

- 1. If I submit my files via the HPMS PDPFS module, do I have to continue using the module for resubmissions of those files or can I submit them via the API? Similarly, if I submit files via the API, do I have to use the API for resubmissions?**

No. Files can be submitted via the module interface and API interchangeably.

- 2. How are the fatal upload errors (Level 1) handled with the API?**

The API will return a response with either error(s) or successful submission. Details are included in Appendix A.

- 3. If I submit my files via the API, will I still receive notification emails from the PDPFS module?**

Yes. Regardless of how the files are submitted (i.e., via the module or API), the PDPFS module will operate in the same manner (e.g., validation logic, reports, attestations, and email notifications).

- 4. If I did not participate in the pilot, can I submit files via the production API?**

Yes. Participation in the PDPFS pilot is not required for use of the production API.

- 5. Are there any changes to the existing validation process (Level 1, Level 2, and Level 3) when submitting via the API?**

No. PDPFS will apply the same validations as if the files were submitted via the module.

6. Can I verify the submission status or other information through the API?

At this time, the API can be used to retrieve the submission status of the files. For detailed information on findings, as in the case of a “Review/Resubmit” status, please refer to the Findings Detail Report in the PDPFS module.

7. Is there any limit to the amount of files I can submit at one time through the API?

One file (i.e., one zip file of pricing files for one contract number) can be sent per request. However, organizations can automate this process to send another file immediately after receiving an API response on each prior submission.