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To: Medicare Delegates

Cc: Medicare FDR

Subject: Aetna FDR Medicare Compliance Program Training (Annual)



FDR Medicare Compliance Program Training

Your organization is considered a “First Tier Entity” by the Centers for Medicare & Medicaid Services (“CMS”) because you have contracted with Aetna* to provide administrative and/or health care services for our Medicare Advantage and/or Medicare Prescription Drug Plans (collectively “Medicare Plans”). As a First Tier Entity, your organization must comply with Medicare Compliance Program requirements.

What requirements apply to FDRs?

CMS requires that Aetna’s First Tiers fulfill specific Medicare Compliance Program Requirements. We describe those requirements in the attached ***First Tier, Downstream, and Related Entities (“FDR”) Medicare Compliance Program Guide (“FDR Guide”)***. You should review the ***FDR Guide***, and ensure you have internal processes in place to support your compliance with all of the requirements. Also, you should communicate the Medicare Compliance Program requirements to any of your Downstream Entities that you use for Aetna’s Medicare Plans.

Training changes effective in 2016

CMS requires that FDRs provide general compliance and fraud, waste and abuse (FWA) training to their employees and Downstream Entities within 90 days of hire/contracting, and annually thereafter. **Notice: Effective 1/1/2016, CMS requires that you use the CMS training courses to meet these training requirements.**

You can find the CMS training courses on the [CMS Medicare Learning Network \(“MLN”\)](#). The courses are titled:

- 1. Medicare Parts C and D General Compliance Training*** and
- 2. Combating Medicare Parts C and D Fraud, Waste, and Abuse Training.***

A copy of each CMS course is attached to this email. The courses can either be completed on the MLN, after registration, OR you can incorporate them, unmodified, into your existing training materials/systems. Either way, you must maintain records of training completion (e.g., MLN Certificates of Completion, internal training certificates, etc.).

Aetna’s Code of Conduct

You must also distribute a code of conduct and compliance program policies within 90 days of hire/contracting, when updates are made, and annually thereafter. You can provide either Aetna’s **Code of Conduct** and **Medicare Compliance Program Policies**, or a comparable code of conduct and/or policies to all employees and Downstream Entities who support Aetna’s Medicare Plans.

Complete an attestation

Attached you will find a 2016 **FDR Attestation** which you will be asked to complete later this year. In addition, if your organization attests on behalf multiple Tax Identification Numbers (TINs), you will be asked to provide a spreadsheet listing each TIN. An authorized representative from your organization should complete the attestation which certifies that your organization has received Aetna's educational training packet, which includes our **FDR Guide**, and are compliant with the CMS compliance program requirements. You need to submit this attestation to Aetna before the end of the 2016 calendar year. If, for any reason, you are unable to certify your compliance or submit the **FDR Attestation**, you should contact Aetna by emailing the following mailbox: MedicareDelegates@aetna.com. You will then be contacted by an Aetna representative to assist you.

What will happen if you don't complete these requirements?

If you fail to comply with CMS requirements or fail to submit a 2016 **FDR Attestation**, it may lead to development of a corrective action plan, retraining, and/or termination of your contract and relationship with Aetna. You are responsible to ensure that any Downstream Entities that you use to service Aetna's Medicare Plans are compliant these requirements.

Make sure you maintain documentation

You are required to maintain evidence of your compliance with the Medicare Compliance Program requirements for no less than 10 years. Aetna or CMS may request that you provide documentation of your compliance with these requirements.

An Aetna representative may contact you to further discuss your organization's program and compliance with these requirements.

If you have any questions or concerns, please send them to **Jamie Strauss** at straussj@aetna.com

Thank you,

Jamie Strauss
Sr. Project Manager
304-799-0845

***Aetna is the brand name used by the Aetna group of subsidiary companies, which includes Coventry Health Care, Inc. and its affiliated companies. Coventry Health Care, Inc. was acquired by Aetna Inc. in 2013.**

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