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## FDR Compliance Newsletter

July 2018 – Issue 18

### Help is available if you're having issues with the new Medicare cards

The Centers for Medicare & Medicaid Services, (CMS) began mailing new Medicare ID cards with a new Medicare number April 2018. The mailings will be staggered with completion expected by April 2019. The new Medicare number will take the place of the health insurance claim number on Medicare cards. The new Medicare number won't change Medicare benefits. Once Medicare members get the new card, they should destroy their old card and start using the new card right away.

If you're having trouble with the new Medicare cards, CMS' provider ombudsman Dr. Eugene Freund can assist you. You can contact him at [NMCPProviderQuestion@cms.hhs.gov](mailto:NMCPProviderQuestion@cms.hhs.gov).

### Updates to Aetna's Medicare Compliance Policies and Procedures

We recently updated our [Aetna Medicare Compliance Policies and Procedures](#). These policies describe Aetna's process for ensuring an effective Medicare Compliance Program. Our FDRs routinely receive these through the initial and annual FDR training communications and are available online. FDRs should implement similar policies or you can adopt ours. Use the link above to access these policies.

### In this issue

- Help is available if you're having issues with the new Medicare cards
- Updates to Aetna's Medicare Compliance Policies and Procedures
- Audit trends for 2017 FDR CPE Reviews
- Training change

### Quick links

- [Archived newsletters](#)
- [Aetna's FDR Guide](#) (updated 3/2018)
- [Medicare Managed Care Manual](#)
- [Medicare Prescription Drug Benefit Manual](#)
- [Aetna's Code of Conduct](#) (updated 12/2017)
- [CMS's General Compliance Training](#)
- [CMS's FWA Training](#)
- Exclusion lists:
  - [OIG's List of Excluded Individuals and Entities \(LEIE\)](#)
  - [GSA's System for Award Management \(SAM\)](#)

*Aetna maintains a comprehensive Medicare Compliance Program. It includes communication with Aetna Medicare FDRs. Dedicated to Aetna's Medicare Compliance Program is John Wells, Medicare Compliance Officer. He's based in Maryland. You can send questions or concerns to [MedicareFDR@aetna.com](mailto:MedicareFDR@aetna.com).*

## Audit trends for 2017 FDR CPE reviews

Aetna routinely audits our FDRs' compliance against the Medicare Compliance Program Effectiveness (CPE) requirements. During 2017, Aetna conducted 77 reviews, identifying 48 First Tiers that had failures.

The most common deficiency was failure to screen Downstream Entities against the required exclusion lists, the Office of Inspector General (OIG) List of Excluded Individuals /Entities (LEIE) and the General Services Administration (GSA) System for Award Management (SAM), before contracting and monthly after that.

To help you meet this requirement, [Aetna's FDR Guide](#) includes a Toolbox of resources that provides sample screening logs and information to help you identify Downstream Entities.

## Training change

CMS is making changes to the training requirements that apply to FDRs. Starting in 2019, CMS will no longer require FDR employees to complete the CMS General Compliance and Fraud Waste and Abuse training. You can review the updated guidance from CMS in [83 FR 16440](#).

Stay tuned. We will provide more details about this change in a future newsletter. If you have questions about how this change affects you, contact [MedicareFDR@aetna.com](mailto:MedicareFDR@aetna.com).



## What is an FDR

**FDR = First tier, downstream and related entities**

A **first tier** entity is any party that enters into a written arrangement with our organization to provide administrative or health care services for our Medicare business.

A **downstream** entity is any party that enters into a written arrangement with persons or entities below the level of the first tier's arrangement with our organization. These arrangements continue down to the level of the ultimate provider of both health and administrative services.

A **related** entity is an entity that is linked to our organization by common ownership or control and provides functions to support our Medicare business.

## Report to Aetna actual or potential fraud, waste and abuse OR non-compliance:

FDRs can have their own internal processes in place for reporting, however, instances which impact Aetna's Medicare business should be reported back to us by using one of the methods below:



By phone:  
**1-888-891-8910**  
(7 days a week, 24 hours a day)



Over the internet:  
<https://aetna.alertline.com>



By mail:  
**Corporate Compliance**  
**P.O. Box 370205**  
**West Hartford, CT 06137-0205**