



## Who should complete training?

### FDR Training Requirements

First Tier, Downstream and Related Entities (FDRs) must provide general compliance and fraud, waste and abuse training to employees within 90 days of initial hiring and annually thereafter. You can learn more about this requirement by reading our [FDR Guide](#).

### Who needs to complete training?

Not every employee needs to take training. The grid below has examples of FDR employees that do and don't need to complete FDR training requirements. It's not a complete list and your organization's titles and positions may be different. If you have questions about which positions at your organization should be required to take the training, we can help. Just send an email to [MedicareFDR@aetna.com](mailto:MedicareFDR@aetna.com).

<b>Examples of FDR employees that <u>do need to complete the FDR training requirements</u>*</b>	<b>Examples of FDR employees that <u>don't need to complete FDR training requirements</u></b>
<ul style="list-style-type: none"> <li>• Providers (e.g. physicians, chiropractors, dentists)</li> <li>• Nurses and nurses' aides</li> <li>• Laboratory and radiology technicians</li> <li>• Pharmacists and pharmacy technicians</li> <li>• Therapists</li> <li>• Social workers</li> <li>• Home health aides</li> <li>• Medical coding staff</li> <li>• Medical records staff</li> <li>• Medical directors</li> <li>• Billing staff, including certified coders, and pharmacy or medical claim processors</li> <li>• Clinical receptionists, schedulers, and admissions clerks (with access to PHI/member ID cards)</li> <li>• Personnel responsible for fulfilling Aetna's Medicare contract terms and conditions (e.g. Senior Administrators, Relationship Managers, Chief Medical or Pharmacy Officer, office manager, and practice managers)</li> </ul>	<ul style="list-style-type: none"> <li>• Housekeeping and custodial staff</li> <li>• Cafeteria workers</li> <li>• Grounds and maintenance workers</li> <li>• General receptionists and front desk coordinators (without access to PHI/member ID cards)</li> <li>• Retail staff (e.g. gift shops, pharmacy)</li> <li>• Non clinical administrative and clerical staff (e.g. human resources, payroll, administrative assistants)</li> <li>• Machine repairmen</li> <li>• Purchasing agents/assistants or logistics coordinators</li> <li>• Mail clerks that sort/distribute mail</li> <li>• General proofreaders</li> <li>• Employees who are not used for Aetna's Medicare product lines</li> </ul>

<ul style="list-style-type: none"> <li>• Staff administering Aetna’s medical or pharmacy benefits including customer service or call center staff that answer benefit specific questions</li> <li>• Staff making decisions on Aetna’s behalf (e.g. clinical decisions, medical organization determinations or pharmacy coverage decisions such as prior authorization)</li> </ul>	
<p><b>*You may have employees that need to complete training but are not outlined in this grid. You should train any employee who may be in a position to commit significant noncompliance or health care FWA. If you have questions about whether an employee at your organization should be required to take the training, we can help. Just send an email to <a href="mailto:MedicareFDR@aetna.com">MedicareFDR@aetna.com</a> .</b></p>	

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