



FDR General Compliance and FWA Training Requirements

FDRs must provide training to all applicable employees within 90 days of initial hiring and annually thereafter. Not every employee is required to take the training. Below are examples of critical roles within an FDR that would be required to fulfill the training requirements. This is not a complete list and your organization’s titles and positions could be different. If you have questions about which employee positions within your organization should be required to take the training, please contact us at compliance@group-health.com.

Examples of FDR employees that are required to complete the General Compliance and FWA Training Requirements	Examples of FDR employees that are not required to complete the General Compliance and FWA Training Requirements
<ul style="list-style-type: none"> • Providers (e.g. physicians, chiropractors, dentists) • Nurses and nurses’ aides • Radiology and laboratory technicians • Pharmacists and pharmacy technicians • Therapists • Social workers • Home health aides • Medical coding personnel • Medical directors • Billing personnel, including certified coders and medical/dental/chiropractic/pharmacy claim processors • Clinical receptionist, schedulers, and admission clerks (with access to PHI/member ID cards) • All personnel responsible for fulfilling the Cooperative’s contract (e.g. Senior VPs, departmental directors, managers and supervisors, chief medical or pharmacy officer, and office manager) • Individuals directly involved with administering the formulary or medical benefit coverage policies and procedures (e.g. customer service or call center staff that answer benefit questions) • Individuals involved with decision-making authority on behalf of Senior Preferred (e.g. clinical decisions, Part D pharmacy coverage determinations, Part C medical organization determinations, appeals and grievances, enrollment/disenrollment functions, processing of pharmacy and medical claims) • Reviewers of member claims and services submitted for payment • Individuals with job functions that place the FDR able to commit significant noncompliance with CMS requirements or health care FWA 	<ul style="list-style-type: none"> • General receptionist/front desk coordinators (without access to PHI/member ID cards) • Housekeeping/custodial staff • Cafeteria workers • Maintenance workers • Retail staff (e.g. gift shops) • Machine service repair personnel • Non-clinical and clerical staff (e.g. payroll, human resources) • Purchasing agents/assistants and logistics coordinators • Mail clerks that sort/distribute mail • Employees who are not used for Cooperative Advantage Part C and Part D products