

## First Tier, Downstream and Related Entities (FDR)

CMS holds plans accountable for the performance and compliance of their First Tier, Downstream and Related entities (FDR). CMS requires health plans to develop a strategy to monitor and audit their FDRs to ensure they are in compliance with all applicable laws and regulations.

CODY's SMEs perform a detailed assessment of your overall FDR program, including contracting and pre-delegation site visits, annual risk assessment, annual delegation auditing, monitoring, attestations, and corrective action plan development and management. We provide an item-by-item review with results, opportunities, and areas of risk.

- CODY<sup>®</sup> can help develop and review your policies and procedures for:
  - FDR identification and set-up
  - FDR auditing and monitoring
  - Coordinate FWA with FDRs
  - OIG/GSA reviews
  - Risk assessments and monitoring
  - Training and attestations
  - Oversight committee activities
  - Corrective action monitoring
- CODY<sup>®</sup> provides plan solutions for monitoring, auditing, and oversight of FDRs:
  - Evaluating FDR data for reporting
  - Design and implementation of delegate reporting protocols, metrics, and SLAs
  - Creation of dashboards and key performance metrics
  - Design of delegate audit tools and training of plan staff in auditing of Medicare delegates
- CODY<sup>®</sup> provides a wide range of FDR auditing services. We can work with your team on a single audit, advise on best practices, and ensure compliance requirements are reviewed. Or, you can delegate all your FDR audits to CODY<sup>®</sup>. Our full-service FDR audits include a detailed audit guide, audit reports, CAP generation, and remediation.
- CODY<sup>®</sup> has conducted FDR audits in areas such as:
  - Enrollment Operations
  - Claims Operations
  - Credentialing
  - UM and Organization Determinations
  - Model of Care and HRA Administration
  - Pharmacy Benefit Managers (PBMs)
  - Field Marketing Organizations (FMOs) and Sales Agents
  - Fulfillment Operations
  - Dental and Vision Sub-Contractors

Since 2006, CODY<sup>®</sup> has bridged the knowledge gap between health plans serving the Medicare market and the government agencies where they contract. We understand the complexity of working with government healthcare programs. Our team has led the industry for decades—and we have the tools and resources to serve you.