



Ascension

First Tier, Downstream, and Related Entities Attestation FAQs

General Questions

What does FDR mean?

FDR stands for first tier, downstream, and related entities. If you perform administrative or health care services on behalf of Ascension Living PACE, then you are an FDR.

Examples include: physicians, hospitals, dentists, behavioral health facilities.

I am a provider for Original Medicare (Parts A and B). Do these requirements apply to me?

If you are a provider that accepts Medicare Parts A and B *and* contracts with us to provide services to our Medicare participants, then these requirements apply to you. These requirements apply to you if you are contracted to provide administrative services or health care services to our Medicare participants.

Why did our organization receive a Compliance Attestation to complete?

Your organization has been identified as a first tier entity because of your contractual relationship with us. Ascension Compliance performs various oversight functions, including distribution of the attestation.

I have no employees. Do I have to complete an attestation?

Yes. If you receive an attestation to complete, it must be completed even if you have no employees.

What documentation must I keep?

You must have documentation to show you are compliant with each requirement. Examples: policies, training logs, investigation reports.

Downstream entity oversight

Which of my subcontractors should be considered downstream entities?

Only those entities who provide administrative or health care services for Ascension Living PACE are downstream entities. FDRs should have a process in place to identify and classify subcontractors as downstream entities.

What requirements apply to downstream entities?

Medicare compliance program requirements apply to downstream entities as addressed in the attestation and program guide.

Additional Resources

[Chapter 9 of the Prescription Drug Benefit Manual](#)

[Chapter 21 of the Medicare Managed Care Manual](#)

[Chapter 11 of the Medicare Managed Care Manual, § 100](#)

[42 CFR §§ 422.503; 423.504](#)

[42 CFR §§ 438.230, 457.1233](#)