

# Humana 2026 FDR Compliance Program

## Frequently Asked Questions and Answers

This document is for guidance only. Your organization may not distribute or publish it outside of your organization or allow any third party to distribute or publish it.

Humana is not liable for any issues arising out of interpretation or use of this guidance; your organization is responsible for consulting with its designated compliance resource and/or legal counsel regarding how to comply with the Centers for Medicare & Medicaid Services (CMS) FDR requirements in the CMS Managed Care Manual; Chapter 21 and Chapter 9.

**The following sites are external and subject to change without corresponding changes in this document:**

CMS website (<https://www.cms.gov>), the General Services Administration's <https://www.sam.gov/SAM/> site and the Office of Inspector General's <https://oig.hhs.gov/exclusions> site.

Government contract requirements may also change without corresponding changes to this document. Your organization is responsible for complying with any applicable changes.

This document pertains to oversight conducted by Humana Third Party FDR Compliance. Other areas of Humana conduct similar and/or separate oversight and have their own FAQ documents and processes.

### Clarifications

To assist you in gaining further understanding of compliance expectations for your organization:

- Questions and their locations within this document are listed below and organized in sections:
  - Compliance Program Requirements
  - Compliance Assignments
- Review all the questions and their answers

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**1. Q: What is a first tier, downstream, or related entity (FDR)?**

A:

First Tier Entity – Any third party that enters into a written arrangement with a Medicare Advantage Organization (MAO) or Part D plan sponsor (Humana entity) to provide administrative services or healthcare services to a Medicare-eligible individual under the MA program or Part D program (Humana-administered Medicare Advantage plan or Medicare prescription drug plan).

**Example:** A healthcare services organization with hospitals and clinics that is contracted directly with Humana.

Downstream Entity – Any party that: enters into a written arrangement with a first tier entity for providing administrative services or healthcare services related to a Humana-administered Medicare Advantage plan or Medicare Prescription Drug plan. This continues down to the level of the ultimate provider of a service or product.

**Example:** The hospitals and healthcare practitioners contracted with the healthcare services organization.

Related Entity – Any entity that is related to an MAO or Part D plan sponsor (Humana) by common ownership or control and performs some of the MAO or part D plan sponsor's management functions and/or provides services to Medicare enrollees

**Example:** Humana Pharmacy Solutions, Inc.

## **Compliance Program Requirements**

**2. Q: My organization is a delegate, supplier, chain pharmacy, or sales agency. Do compliance program requirements apply to my organization?**

A: Yes, compliance program requirements apply if your organization supports Humana Medicare Advantage and/or Part D plans.

**3. Q: My organization is an IPA or PHO. Do compliance program requirements apply to my organization?**

A: Yes, CMS and Humana consider these requirements applicable to your organization. Additionally, your organization is responsible for training or assuring training of the healthcare provider entities contracted with your organization.

**4. Q: I received an email from Humana stating that I have been identified as the compliance contact for my organization and that I am responsible for compliance activities. What is this about?**

A: CMS mandates that all Humana first tier, downstream and related entities (FDRs) adhere to compliance program requirements. You, as the designated compliance

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representative, are required by Humana to complete at least one compliance activity annually on behalf of your organization.

*If you are not the compliance contact for your organization:*

Please contact [ThirdPartyFDRCompliance@humana.com](mailto:ThirdPartyFDRCompliance@humana.com) and provide the name, title, phone number and email address of the person authorized to respond to compliance-related matters for your organization.

**5. Q: Why is Humana communicating compliance program requirements to me?**

A: Humana has contracts with CMS that require Humana's FDRs to adhere to compliance program requirements. and for Humana to notify FDRs about the requirements.

*If you are not the compliance contact for your organization:*

Please contact [ThirdPartyFDRCompliance@humana.com](mailto:ThirdPartyFDRCompliance@humana.com) and provide the name, title, phone number and email address of the person authorized to respond to compliance-related matters for your organization.

**6. Q: Are the compliance program requirements that you notified my organization's compliance contact about a one-time requirement?**

A: No, what is communicated and/or assigned is not a one-time requirement.

Humana sends notifications at least annually to all its FDRs as a reminder that they must be aware of and comply with compliance program requirements

**7. Q: Are the Humana compliance policy and standards of conduct documents provided to Humana's FDRs the same each year?**

A: No. Humana reviews the documents at least annually and, when applicable, revises content. Typical changes reflect clarifications on existing processes or requirements, although new or revised requirements can be incorporated. To simplify your review of the Humana compliance materials referenced in this question, there is a notable changes section in each of the documents.

**8. Q: Are fraud, waste and abuse (FWA) training and compliance training required?**

A: Yes, CMS and Humana require your organization to conduct FWA training and compliance training of those designated to support Humana Medicare business.

**Note:** Humana does not deploy FWA and compliance training to your organization or those your organization may designate to support Humana Medicare business.

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However, Humana may request an annual, organization-level attestation to certify that the training is being conducted. Your organization may incorporate Humana

content into training material, use it to supplement training content or use materially-similar documents specific to your organization and the type of work it performs for Humana.

Your organization is responsible for:

- developing the content on the topic or adopting content on the topic that another organization created;
- providing the training; and
- tracking the training.

If your organization contracts with downstream entities to support or perform a delegated function on Humana's behalf, your organization may elect to not conduct training of the downstream entity's employees, but instead require an annual attestation from the entity(s) to assure FWA and compliance training is being conducted.

**9. Q: Does my organization's compliance contact still have to complete the assigned compliance activity for Humana, when we have our own similar policy documents and training materials, or we already completed similar training and education furnished by another organization?**

A: Yes, your organization's compliance contact must complete a compliance activity assigned by Humana each calendar year.

**10. Q: Where can I get more information about compliance program requirements?**

A: Requirements for Plan Sponsors like Humana, and their first tier, downstream or related entities (which include delegates, suppliers, pharmacies, sales agencies and healthcare providers and related organizations), are outlined in Federal publications.

The most notable are:

**Regulations:** [42 C.F.R. § 422.503](#)

**Dual-purpose CMS publication:** [CMS compliance program guidelines manuals \(Chapter 9 and Chapter 21\)](#)

### Assigned Activities

**11. Q: How is my organization notified of an assigned compliance activity?**

A: Your organization's compliance contact is sent a notification email from Humana Third Party FDR Compliance via noreply@archerirm.us for compliance activities

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assigned via Archer Engage. If your organization is selected for a compliance program audit, the email is sent from the individual Humana auditor's Humana email.

As needed, follow-up requests may be sent from [noreply@archerirm.us](mailto:noreply@archerirm.us), [ThirdPartyFDRCompliance@humana.com](mailto:ThirdPartyFDRCompliance@humana.com), or the Humana email of an individual managing the corresponding oversight process. As applicable, these emails include detailed instructions on how to access the Archer Engage Portal and/or how and when to submit information/documentation.

### **12.Q: What compliance assignments are my organization's compliance contact required to complete for Humana?**

A: The compliance contact is required to complete one or more of the following in any calendar year:

- an Organization Compliance Program Self-Assessment (OCPSA)
  - The assessment consists of mostly yes/no questions about your organization's compliance program.
- a Third Party Medicare Questionnaire (TPMQ)
  - The questionnaire consists of yes/no questions related to your organization's general compliance and FWA training and education processes
- additional requirements as assigned by Humana, as applicable

### **13.Q. How does my organization complete the assigned compliance activities?**

A: A notification email is sent to your organization's compliance contact, advising of the requirement(s) to complete as well as instructions on how to access and submit the compliance activity.

### **14.Q: When does the compliance contact have to complete an assigned compliance activity?**

A: An assigned compliance activity is due within thirty (30) days of the date of the initial notification.

### **15.Q: What if I have problems accessing the online system (Archer Engage) or activity OR have questions about an assigned activity?**

A. Email [ThirdPartyFDRCompliance@humana.com](mailto:ThirdPartyFDRCompliance@humana.com) with questions This includes if your organization needs to update the compliance contact information for your organization to assure access to Archer Engage. Only the compliance contact for your organization on file with Humana can access compliance activities using the email address that Humana has on file.

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For compliance activities that are to be completed outside of Archer Engage, direct your inquiry to the sender of the request.

**16.Q: Our organization's compliance contact just completed an assigned compliance activity not that long ago, so why is Humana requesting that our compliance contact complete one again?**

A: A compliance contact is sent any additional notification(s) regarding an assigned compliance activity due to one of these reasons:

- a) The compliance activity remains incomplete or unsubmitted.
- b) The compliance activity that was completed by the compliance contact was for the previous calendar year, while the activity the compliance contact is requested to complete now is for the current calendar year.

**17.Q. If my organization's compliance contact is not assigned anything to complete within the Archer Engage Portal this year, and my organization is not selected for a compliance program audit this year, does my organization still have to adhere to requirements outlined in the following Humana documents?**

- **Compliance Policy for Contracted Healthcare Providers and Third Parties**
- **Ethics Every Day for Contracted Healthcare Providers and Third Parties**

A: Yes, your organization must still adhere to the requirements outlined in the aforementioned policies.

If your organization did not receive a notification about an assigned compliance activity, your organization must contact Humana's FDR Compliance team at [ThirdPartyFDRCompliance@humana.com](mailto:ThirdPartyFDRCompliance@humana.com) to inquire about what is needed to assure annual compliance.

**18.Q: Does submission of responses and documentation for all assigned compliance activities mean my organization is considered compliant with Humana's compliance program requirements?**

A: Not necessarily. A review of the submitted responses by a member of Humana's FDR Compliance team may result in a corrective action plan being issued to your organization if deficiencies in your organization's compliance program are identified.

**19.Q: How do I confirm that I completed all assigned compliance activities?**

A: You will receive a 'confirmation of completion status' email from either [emailnoreply@archerirm.us](mailto:emailnoreply@archerirm.us), [ThirdPartyFDRCompliance@humana.com](mailto:ThirdPartyFDRCompliance@humana.com) or a representative of Humana's FDR Compliance team.

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**20.Q: What if my organization's compliance contact does not complete an assigned compliance activity?**

A: Your organization will be out of compliance with the requirements of CMS and

Humana. This may result in a corrective action plan being issued to your organization, up to potential termination of your organization's agreement with Humana.

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**21.Q: What if I have a question that is not addressed in this FAQ?**

A: Additional questions may be directed to Humana FDR Compliance at [ThirdPartyFDRCompliance@humana.com](mailto:ThirdPartyFDRCompliance@humana.com).