Health Plan FDR Compliance Readiness Consulting

Last reviewed October 2026 · https://www.integralhs.com/health-plan-fdr-compliance-readiness

What to have ready

Each item ties to 42 CFR Part 422 (eCFR current as of 30 September 2026) or to the BCBST FDR oversight page (page opened October 3, 2026) as one plan's example. Substitute each of your plans' own requirements where they differ.

- Every current health plan contract and amendment, including the clause granting HHS and the Comptroller General the right "to audit, evaluate, collect, and inspect any books, contracts, computer or other electronic systems" (42 CFR 422.504(i)(2)(i) [https://www.ecfr.gov/current/title-42/section-422.504]).
- Each plan's FDR oversight manual or requirements page, such as the BCBST FDR oversight page [https://www.bcbst.com/about/our-company/corporate-governance/fdr-oversight].
- A list of the services you provide for Medicare members under each contract, to test against the first tier and downstream definitions (42 CFR 422.2 [https://www.ecfr.gov/current/title-42/section-422.2]).
- Records of fraud, waste and abuse training and general compliance training for staff, a topic on the BCBST page [https://www.bcbst.com/about/our-company/corporate-governance/fdr-oversight].
- Exclusion screening logs covering staff and entities, another BCBST topic.
- Your code of conduct or compliance program policy and proof that it reached staff, which the BCBST page also covers.
- The channel and log you use to report fraud, waste, abuse and general compliance concerns to each plan (a BCBST topic), and the name of the person the plan's compliance officer communicates with (42 CFR 422.503(b)(4)(vi)(D) [https://www.ecfr.gov/current/title-42/section-422.503]).
- Your record retention schedule, which BCBST also lists.
- A list of any offshore subcontractors, since BCBST treats offshore subcontracting as reportable.
- A list of your own downstream and related entities and the records of how you monitor and audit them, a further BCBST topic.