NCQA Corrections, Clarifications and Policy Changes to the 2016 CVO Standards and Guidelines

July 30, 2018

This document includes the corrections, clarifications and policy changes to the 2016 CVO standards and guidelines. NCQA has identified the appropriate page number in the printed publication and the standard and head—subhead for each update. Updates have been incorporated into the Interactive Review Tool (IRT). NCQA operational definitions for correction, clarification and policy changes are as follows:

- **A correction (CO)** is a change made to rectify an error in the standards and guidelines.
- **A clarification (CL)** is additional information that explains an existing requirement.
- **A policy change (PC)** is a modification of an existing requirement.

An organization undergoing a survey under the 2016 CVO Standards and guidelines must implement corrections and policy changes within 90 calendar days of the IRT release date, unless otherwise specified. The 90-calendar-day advance notice does not apply to clarifications or FAQs, because they are not changes to existing requirements.

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| 11   | Policies and Procedures—Section 1: Eligibility and the Application Process | Organization Obligations | Add the following as sub-bullets under the third bullet:  
- An organization that ceases to do business and no longer has clients before the end of its NCQA Certification cycle will be removed from the NCQA CVO Report Card.  
- An organization that continues to have clients and elects to withdraw from certification and not continue to meet NCQA requirements before the end of its NCQA Certification cycle, will be reported as “Revoked” on the NCQA CVO Report Card. | CL | 7/30/2018 |
| 22   | Policies and Procedures—Section 3: The Survey Process | Reconsideration—Reconsideration request | Add the following as the last sentence of the second paragraph:  
The request may be submitted via email to Reconsiderations@ncqa.org or mailed to:  
NCQA Office of Program Integrity  
1100 13th Street NW, 3rd Floor  
Washington DC, 20005 | CL | 7/30/2018 |
| 22   | Policies and Procedures—Section 3: The Survey Process | Reconsideration—Documentation supporting Reconsideration | Delete the last sentence of the note, which reads:  
The organization must provide NCQA with 12 copies of materials. | CL | 7/30/2018 |
| 28   | Policies and Procedures—Section 5: Additional Information | Notifying NCQA of Reportable Events—Annual Attestation of Compliance With Reportable Events | Revise the second sentence in the second paragraph to read:  
Submit Reportable Events via email to ReportableEvents@ncqa.org and annual attestations electronically to Attestations@ncqa.org, by fax to 202-955-3599 or by mail to the address below: | CL | 7/30/2018 |

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| 35   | CVO 1, Element A | Explanation  | Add as the seventh bullet in the Explanation under "The policies and procedures also":  
- Describes the organization's process for providing accurate information to clients, correcting discrepancies, and notifying practitioners or clients when credentialing information obtained through the verification process varies substantially from that provided by the practitioner, including, but not limited to:  
  - Updated information.  
  - Erroneous information. | CL | 7/30/2018 |
| 47   | CVO 3, Element E | Explanation  | Revise the Explanations for factors 2 and 3 to read:  
Factor 2: Controls for back-up  
The organization has a process for providing feedback that data are successfully backed up or archived.  
Factor 3: Archived data  
The organization can archive data for long-term or permanent storage.  
Documentation of policies and procedures shows:  
- How data are archived.  
- That data are in locations devoid of corruption.  
- Appropriate access controls are in place. | CO | 7/30/2018 |
| 56   | CVO 8, Element A | Explanation—  
Credentials verification, documentation and timeliness | Remove the first sentence in the first paragraph, which reads:  
The organization documents verification from the primary source or NCQA-approved sources, and verifies and reports all credentials to the client within NCQA specified time limits. | CL | 7/30/2018 |
| 64   | CVO 12, Element A | Scope of review | Revise the scope of review to read:  
NCQA reviews application and attestation in a random sample of 75 credentialing files processed by the organization during the look-back period. | CO | 7/30/2018 |

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<td>11</td>
<td>Policies and Procedures—Section 1: Eligibility and the Application Process</td>
<td>Applying for an NCQA Survey—Application timeline</td>
<td>Revise the first sentence to read: Organizations submit the complete application a <em>minimum of nine months</em> before the requested survey date. Remove the note that reads: <strong>Note:</strong> Unless state or other applicable law requires modifications, all organizations are expected to sign NCQA’s standard Agreement. Requests to change the standard Agreement due to legal conflicts must be approved by NCQA, and must be submitted with evidence of the legal conflict at least 12 months before the requested survey date.</td>
<td>CL</td>
<td>3/26/2018</td>
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<tr>
<td>11</td>
<td>Policies and Procedures—Section 1: Eligibility and the Application Process</td>
<td>Applying for an NCQA Survey—Survey fee</td>
<td>Revise the section to read: All pricing policies and survey fees are specified in Exhibit A of the Agreement.</td>
<td>CL</td>
<td>3/26/2018</td>
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<td>11</td>
<td>Policies and Procedures—Section 1</td>
<td>Eligibility and the Application Process—Organization Obligations</td>
<td>Add the following note as a separate paragraph under the last bullet: <strong>Note:</strong> If NCQA conducts a Discretionary Survey, it reviews the organization against the standards in effect at the time of the Discretionary Survey.</td>
<td>CL</td>
<td>11/20/2017</td>
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<td>13</td>
<td>Policies and Procedures—Section 2</td>
<td>Certification Surveys—State and Federal Agency Survey</td>
<td>Revise the first and second paragraph to read: NCQA has been approved (or deemed) by many state and federal agencies, and conducts surveys that are accepted in lieu of state or federal surveys or as meeting government requirements. These agencies recognize NCQA standards and guidelines as meeting selected regulatory and contract schedule requirements to satisfy agency solicitations and awards. NCQA may also create a separate module to cover the additional regulatory requirements not addressed by NCQA standards. NCQA evaluates an organization’s performance against requirements agreed to by the regulatory agency, contracting entity and NCQA. NCQA policies and procedures apply to the extent it deems appropriate, unless otherwise defined by the government agency and agreed to by NCQA.</td>
<td>CL</td>
<td>11/20/2017</td>
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| 18   | Policies and Procedures—Section 2 | The Certification Process—Core Elements and Must-Pass Elements | Revise the second and third bullets to read:  
- Receive a score of 100% for all the elements in the selected certification option.  
- Achieve at least a 70% score for the entire certification option, comprised of the core standards (CVO 1-3) and the other applicable standard for the selected certification options. | CL             | 3/27/2017       |
| 27   | Policies and Procedures—Section 5 | Reporting Hotline for Fraud and Misconduct—How to Report | Replace the “English-speaking USA and Canada” toll free telephone number with 844-440-0077.                                                                                                                  | CO             | 11/20/2017      |
| 28   | Policies and Procedures—Section 5 | Notifying NCQA of Reportable Events   | Move Notifying NCQA of a Reportable Event above the Discretionary Survey section and update the language.  
See the attached Policies and Procedures to review updates to this section, which includes the definition of Reportable Events, the process for notifying NCQA of Reportable Events and a description of the investigative process that NCQA may initiate following a Reportable Event. | PC             | 11/20/2017      |
| 28   | Policies and Procedures—Section 5 | Discretionary Survey—Time frame       | Revise the first sentence to read:  
The Discretionary Survey is generally conducted within 60 calendar days of notification by NCQA of its intent to conduct a Discretionary Survey, but may include an unannounced survey. | PC             | 11/20/2017      |
| 28   | Policies and Procedures—Section 5 | Discretionary Survey                  | Revise the Discretionary Survey section to read:  
NCQA may survey an organization while a certification status is in effect. This survey is called a Discretionary Survey and its purpose is to validate the appropriateness of the organization’s ongoing certification.  
Structure  
NCQA determines the scope and content of Discretionary Surveys, which may consist of one or more of the following:  
- An offsite document review.  
- An onsite survey.  
- A teleconference.  
- A tour (if the organization has physically moved its location).  
Target                                                                                      | PC             | 11/21/2016      |

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<td>Discretionary Surveys address issues regarding the organization’s continued performance against NCQA’s standards and other considerations that may pose an imminent threat to members. During a discretionary review, a certified organization will be reviewed under the NCQA standards in effect at the time of the discretionary review. The Discretionary Survey may include review of a sample of credentialing and recredentialing files, as appropriate and interviews with organization staff. Any relevant look-back period for file review standards will be determined at the time of the Discretionary Survey and may or may not reflect the full look-back period identified in the standards.</td>
<td><strong>CO</strong></td>
<td>11/20/2017</td>
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<td>30</td>
<td>Policies and Procedures—Section 5</td>
<td>Mergers and Acquisitions</td>
<td>Replace the language with the following: An NCQA-Certified organization involved in a merger, acquisition, consolidation or other form of corporate reorganization, including filing for dissolution, must submit written notice of such action to NCQA within 30 calendar days following the date of the merger, acquisition, consolidation or reorganization, or earlier, if possible. Refer to Appendix 5: Mergers, Acquisitions and Consolidations. An NCQA-Certified organization must also notify NCQA in writing within 30 calendar days of any change in operational structure or the organization’s status that affects the scope of review under NCQA’s standards for CV0 Certification, such as</td>
<td><strong>PC</strong></td>
<td>11/20/2017</td>
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<td>51</td>
<td>CVO 5, Element A</td>
<td>Explanation—Practitioners who prescribe medications:</td>
<td>Revise the paragraph to read: This element applies to practitioners who are qualified to write prescriptions. The organization verifies that the practitioner's Drug Enforcement Administration (DEA) or Controlled Dangerous Substances (CDS) certificate is valid and current in each state where the practitioner provides care to members. Acceptable verification sources:</td>
<td>CL</td>
<td>11/20/2017</td>
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<td>53</td>
<td>CVO 6, Element A</td>
<td>Explanation—Completion of residency training</td>
<td>Remove the subbullet under “FCVS for closed residency programs” and make the following text a separate paragraph: NCQA only recognizes residency programs accredited by the Accreditation Council for Graduate Medical Education (ACGME) and the American Osteopathic Association (AOA) (in the United States) or by the College of Family Physicians of Canada (CFPC) or the Royal College of Physicians and Surgeons of Canada.</td>
<td>CL</td>
<td>11/20/2017</td>
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<td>61</td>
<td>CVO 10, Element A</td>
<td>Explanation—Scope of review for sanctions or limitations on licensure</td>
<td>Add as the first sentence in the first paragraph: The organization verifies state sanctions, restrictions on licensure or limitations on scope of practice in all states where the practitioner provides care to members.</td>
<td>CL</td>
<td>11/20/2017</td>
</tr>
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<td>63</td>
<td>CVO 11, Element A</td>
<td>Explanation—Medicare/Medicaid Sanctions</td>
<td>Add as the sixth bullet: • AMA Physician Master File.</td>
<td>PC</td>
<td>7/25/2016</td>
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<td>5-1</td>
<td>Appendix 5: NCQA Mergers, Acquisitions and Consolidations Policy for CVOs</td>
<td>The MAC Policy</td>
<td>Revise the second and third sentence in the first paragraph to read: Mergers, acquisitions, consolidations and corporate reorganizations are treated the same under NCQA’s MAC Policy. The terms merge, merged and merger also refer to acquisitions, consolidations and reorganizations.</td>
<td>CL</td>
<td>11/20/2017</td>
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<td>5-2</td>
<td>Appendix 5: NCQA Mergers, Acquisitions and Consolidations Policy for CVOs</td>
<td>Definitions</td>
<td>Add the following definitions for “reorganization” and “reorganization date” as follows: reorganization The process of reorganizing or altering the corporate structure of an organization, including the creation of a new organization or the dissolution of the organization as an entity. The filing for petition for bankruptcy or the initiation of</td>
<td>CL</td>
<td>11/20/2017</td>
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<td>5-2</td>
<td>Appendix 5: NCQA Mergers, Acquisitions and Consolidations Policy for CVOs</td>
<td>Written Notice—Timing of written notice</td>
<td>Revise the first paragraph and the NCQA address to read: An NCQA-Certified organization involved in a merger, acquisition, consolidation or reorganization must submit written notice of such action to NCQA within 30 calendar days following the merger, acquisition, consolidation or reorganization date, or earlier, if possible. Send the written notice to the following address: National Committee for Quality Assurance 1100 13th Street NW, Third Floor Washington, DC 20005</td>
<td>CL</td>
<td>11/20/2017</td>
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<tr>
<td>5-3</td>
<td>Appendix 5: NCQA Mergers, Acquisitions and Consolidations Policy for CVOs</td>
<td>MAC Evaluation and Outcomes</td>
<td>Add as the first paragraph: Some organizations may merge or completely consolidate with other organizations in stages, over a period of months. Because of their complexity, NCQA examines these situations on a case-by-case basis. A look-back period of 6 months applies to each transaction, to determine if a serial merger or complete consolidation situation exists and to decide the type of survey that may be necessary.</td>
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