



For Public Comment
November 5–December 17, 2018
Comments due 5:00 p.m. ET
December 17, 2018

Other Product Updates Overview

WHP 2020 & MBHO 2020

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Other Product Updates Overview

Our Mission: Improve the Quality of Health Care

NCQA is dedicated to improving health care quality.

For almost 30 years, NCQA has been driving improvement throughout the health care system, helping to advance the issue of health care quality to the top of the national agenda. NCQA's programs and services reflect a straightforward formula for improvement: measurement, transparency, accountability.

This approach works, as evidenced by the dramatic improvements in clinical quality demonstrated by NCQA-Accredited health plans—health maintenance organizations (HMO), point-of-service (POS) organizations, preferred provider organizations (PPO)—using both standards and performance results. Today, approximately 181 million Americans are enrolled in a NCQA-Accredited health plan.

Background and Objectives

Wellness and Health Promotion (WHP)

Performance Measurement has been part of the WHP Standards and Guidelines since 2009; however, there is limited incentive for organizations to report audited WHP performance measure results. Before 2014, no points were associated with completing the requirements of *WHP 12: Reporting WHP Performance*. Organizations that submitted audited WHP performance measure results were eligible to receive Accredited With Performance Reporting (AWPR) status and earned their Accreditation status for three years (as opposed to two).

Beginning with the 2014 standards, WHP 12 was required for all organizations interested in WHP Accreditation, even for organizations that were not pursuing AWPR status. Currently, WHP 12 is worth 2 points. While most organizations collected data on the measurement areas included in NCQA's WHP measures, only nine of the 19 accredited organizations submitted audited results in 2018. The low number of organizations reporting audited WHP performance results prevents NCQA from providing meaningful benchmarks/comparisons or using the data to rate organization performance. In addition, Audit firms struggle with explaining the benefits of continuing the audit program. NCQA recommends changing the standards to align with current market needs.

Managed Behavioral Healthcare Organization (MBHO)

RR 4: Practitioner and Provider Directories has been part of the MBHO Standards and Guidelines since 2014. NCQA recommends changing the standards to align RR 4 with the corresponding requirement in HPA (NET 6) and ascertain accuracy of directories for behavioral healthcare practitioners and providers. In addition, some of the changes (QI 4, Element E, NET 3, Element A, NET 3, Element C and RR 2, Elements A, B,) for HPA 2020 will also carry over to MBHO 2020. Please refer to *HPA 2020 Updates Overview* for additional information.

NCQA is seeking feedback from the public regarding these changes.

The NCQA Advantage

Proposed WHP and MBHO updates aim to align standards with the changing market landscape, stakeholder needs and to assist organizations in their pursuit of quality care. The NCQA Accreditation seal is a sign to stakeholders—including employers, states and CMS—that organizations deliver high-quality care and have strong member protections.

Stakeholders Participating in Public Comment

NCQA shares these changes for public comment to generate thoughtful commentary and constructive suggestions from interested parties. Many comments lead to changes in our standards and policies, and the review process makes our standards stronger for all stakeholders.

NCQA asks respondents to consider whether the requirements are feasible as written and are clearly articulated, and to highlight areas that might need clarification.

WHP 2020

Refer to [Appendix 1: WHP 2020 Proposed Standard Changes](#).

Recommendations:

- Eliminate the requirement to report audited results for WHP performance measures.
- Eliminate AWPR as a status option in the WHP standards and guidelines.
- Revise the status options for WHP Accreditation as follows:

Accreditation Status	Standards Score
Accredited—3 years	90–100
Accredited—2 years	70–89.99...
Denied	69.99 and below

- Change WHP 12 to an annual requirement and assess the organization's measure results during the survey process.
- Consolidate the measure specifications into the WHP standards and guidelines as a new appendix, so there is only one WHP publication.

Rationale: Although existing measures are appropriate, there is insufficient market demand to merit the required resource-intensive full HEDIS compliance audit and special AWPR status. In addition, the lack of market demand means NCQA is unlikely to have enough submissions to create benchmarks and thresholds for scoring organizations based on measure performance.

Targeted Questions

1. Do you approve the recommendation to eliminate the requirement to report audited results for WHP performance measures and eliminate AWPR as a status option? If not, why not?
2. Do you approve the recommendation to revise the status scoring options for WHP Accreditation as shown in the table above? If not, why not?
3. Do you approve the recommendation to raise the minimum threshold for the 3-year status to 90%? If not, why not?
4. Do you approve the recommendation to change WHP 12 to require annual monitoring of the measures and assess the organization's measure results during the survey process? If not, why not?

MBHO 2020

Refer to [Appendix 2: MBHO 2020 Proposed Standard Changes](#).

Recommendation: Add two elements to *RR 4: Practitioner and Provider Directories*:

- Element C: Assessment of Practitioner Directory Accuracy.
- Element D: Identifying and Acting on Opportunities.

Rationale: Align with existing health plan directory requirements (NET 6) and industry trends.

Other applicable products: None.

Targeted Question

1. Do you approve the recommendation to add *Element C: Assessment of Practitioner Directory Accuracy* and *Element D: Identifying and Acting on Opportunities* to the 2020 MBHO standards and guidelines? If not, why not?

How to Submit Comments

Public comment is integral to the development of all NCQA standards and measures. NCQA considers all suggestions. NCQA encourages reviewers to provide insights on global issues related to the proposed HPA updates, including:

1. Will the proposed WHP and MBHO updates help your organization meet its objectives? If so, how? If not, why not?
2. Are there key expectations not addressed in the proposed WHP and MBHO requirements?
3. Do the proposed requirements align with your state's managed care efforts?

Documents

Find draft standards/measures, recommendations, rationale and explanations for updates in *Appendix 1: WHP 2020 Proposed Standard Changes* and *Appendix 2: MBHO 2020 Proposed Standard Changes*.

Submitting Comments

Respond to topic and element-specific questions for each product on NCQA's public comment website: <http://my.ncqa.org>. NCQA does not accept comments by mail, email or fax.

1. Go to <http://my.ncqa.org> and enter your email address and password.
2. Select the **Public Comments** module to view available public comment.
 - a. Click **Open Public Comments** to view instructions, proposed requirements and questions.
3. Click **Add Comment** to open the comment box.
4. Select from the following topics:
 - a. **WHP 2020 Updates** from the product drop-down list.
 - b. **MBHO 2020 Updates** from the product drop-down list.
5. Click to select the **Topic** and **Element** (question) on which you would like to comment.
6. Click to select your support option (**Support, Do not support, Support with modifications**).
 - a. If you choose **Do not support**, include your rationale in the text box.
 - b. If you choose **Support with modifications**, enter the suggested modification in the text box.
7. Enter your comments in the **Comments** box.

Note: There is a 2,500-character limit for each comment. We suggest you develop your comments in Word to check your character limit; use the "cut and paste" function to copy your comment into the Comments box.
8. Use the **Submit** button to submit more than one comment. Use the **Close** button to finish leaving comments; you can view all submitted comments in the **Public Comments** module.

All comments must be entered by Monday, December 17, by 11:59 p.m. ET

Next Steps

The final WHP 2020 standards and guidelines and MBHO 2020 standards and guidelines will be released in December 2019, following approval by the NCQA Standards Committee and the Board of Directors.

Requirements for WHP 2020 and MBHO 2020 are effective for surveys beginning July 1, 2020.