

NCQA Corrections, Clarifications and Policy Changes to the 2024 HPA Standards and Guidelines

November 20, 2023

This document includes the corrections, clarifications and policy changes to the 2024 Health Plan Accreditation standards and guidelines. NCQA has identified the appropriate page number in the publication the standard/element head and 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.
- A **regulatory change (RC)** is a new requirement or a modification of an existing requirement to align with federal regulations.

An organization undergoing a survey under the 2024 Health Plan Accreditation 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; nor does it apply to regulatory changes, because they align with federal regulations.

Page	Standard/Element	Head/Subhead	Update	Type of Update	IRT Release Date
	All		Replace references to “Appendix 5: Glossary” with “Appendix 4: Glossary” throughout the publication.	CO	11/20/23
17	Policies and Procedures—Section 1: Eligibility and the Application Process	Eligibility for Accreditation—Eligibility for international organizations	Revise the second sentence of the second paragraph to read: Organizations that do not operate in the United States (i.e., conduct no activities in the U.S., including in states and territories; conduct no operations for U.S. members and clients) or have no members, patients or clients in the United States are not eligible for NCQA Health Plan Accreditation.	CL	11/20/23
45	Policies and Procedures—Section 3: The Survey Process	About the Survey Process—Offsite review	Revise the first paragraph and add a new second paragraph that reads: The survey begins when NCQA receives the completed survey tool and the supporting documentation. The organization must submit a complete survey tool to NCQA on the scheduled survey start date (submission date), including self-assessed scores and all supporting evidence to be considered. The organization has one opportunity during the survey process to address surveyor questions and initial findings and to submit additional supporting evidence if needed. All applicable evidence must be provided during the survey; new supporting evidence may not be introduced after the survey has concluded.	CL	11/20/23
46	Policies and Procedures—Section 3: The Survey Process	Survey Results and Scoring—Comments about errors or omissions	Revise the text to read: NCQA gives the organization access to preliminary survey results in the IRT for review and comment. The organization has 10 calendar days to submit comments	CL	11/20/23

Key = CO—Correction, CL—Clarification, PC—Policy Change, RC—Regulatory Change

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			<p>regarding factual errors or omissions before the survey report is sent to the Review Oversight Committee (ROC) for the final status decision.</p> <p>The organization comment process is not an opportunity to introduce new supporting evidence that was not included in the survey submission or that is in response to initial issues. NCQA only considers comments and supporting evidence that are related to factual errors or omissions in the preliminary report and are based on information and evidence presented during the survey.</p> <p>The organization may only submit information that existed at the time of the original survey submission with its comments. It may not introduce information that did not exist at the time of the original survey submission.</p> <p>Comments should only be included in IRT if findings on an element are being contested due to a scoring error or omission.</p>		
46	Policies and Procedures—Section 3: The Survey Process	Survey Results and Scoring—Comment extension period	<p>Revise the text to read:</p> <p>NCQA reviews the organization’s comments and incorporates changes into the preliminary results, as appropriate. In special cases, NCQA may grant the organization a 5-calendar-day extension period to submit comments, upon request, but all comments must be received within 15 calendar days. Requests are on a case-by-case basis and require reasonable justification for the request.</p>	CL	11/20/23
46	Policies and Procedures—Section 3: The Survey Process	Survey Results and Scoring—Notification of downgraded scores and final Accreditation decision	<p>Revise the second paragraph to read:</p> <p>The organization may introduce additional supporting evidence in response to ROC findings, but may only submit information that existed at the time of the original completed survey tool submission, and may not introduce information that did not exist at the time of the original survey tool submission.</p>	CL	11/20/23
93	QI 1, Element E	Scope of review—Documentation	<p>Replace “policies and procedures” with “policies and procedures or materials” in the first bullet.</p>	CL	11/20/23
374	UM 1, Element A	Summary of changes	<p>Revise the bullet to read:</p> <ul style="list-style-type: none"> • Removed the reference to “are covered benefits” in the fifth paragraph under “Medical necessity review.” 	CL	11/20/23
380	UM 13, Element C	Explanation—Factor 2	<p>Add the following language as a new fourth paragraph:</p> <p>For mail service delegates only, the organization may submit the delegate’s timeliness report of mail distribution in lieu of an audit.</p>	CL	11/20/23

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380	UM 13, Element C	Explanation—Factor 5— Audit	Revise the third bullet to read: <ul style="list-style-type: none"> • 5% or 50 files, whichever is less, or 	CO	11/20/23
382	UM 13, Element C	Exceptions	Revise the fourth paragraph to read: Factors 3 and 4 are NA if a mail service delegate distributes information for an element with annual frequency.	CL	11/20/23
382	UM 13, Element C	Exceptions	Remove the first bullet from the sixth paragraph, which reads: <ul style="list-style-type: none"> • Provide print mail service only. 	CL	11/20/23
383	UM 13, Element C	Exceptions	Remove the last bullet from the sixth paragraph, which reads: <ul style="list-style-type: none"> • Return UM data provided by the organization. 	CL	11/20/23
383	UM 13, Element C	Exceptions	Remove the seventh paragraph, which reads: All bullets must be addressed in a delegation agreement for factors 5 and 6 to be NA.	CL	11/20/23
398	CR 1, Element C	Examples	Replace “Factor 6” with “Factor 4” in the second subhead.	CO	11/20/23
429	CR 8, Element A	Data source	Remove “documented process” as a data source.	CL	11/20/23
507	LTSS 1, Element D	Data source	Add “reports” and “materials” as data sources.	CL	11/20/23
521	LTSS 1, Element H	Explanation	Replace “Element B and Element C” with “Element F and Element G” in the first sentence.	CO	11/20/23
523	LTSS 1, Element H	Explanation—Factor 2	Replace “complex case management” with “case management” in the first sentence of the third paragraph.	CL	11/20/23
526	LTSS 1, Element I	Scope of review— Documentation	Revise the sentence to read: NCQA reviews the organization’s policies and procedures for completing person-centered assessments.	CL	11/20/23
527	LTSS 1, Element I	Explanation—Factor 2	Replace “Element F” with “Element J” in the third sentence.	CO	11/20/23

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529	LTSS 1, Element J	Scope of review—Documentation	Revise the sentence to read: NCQA reviews the organization’s policies and procedures for creating individualized, person-centered case management plans.	CL	11/20/23											
531	LTSS 1, Element J	Explanation—Factor 5	Revise the last sentence in the first paragraph to read: Case management policies and procedures specify a process for developing an emergency back-up plan customized to the member.	CL	11/20/23											
537	LTSS 1, Element L	Explanation	Replace “policies and procedures” with “processes” in the fourth paragraph.	CL	11/20/23											
538	LTSS 1, Element M	Scope of review—Documentation	Revise the first paragraph to read: <i>For All Survey Types:</i> NCQA reviews the organization’s policies and procedures for factors 1-4. <ul style="list-style-type: none"> For factor 1, in addition to the policies and procedures, organizations may also submit materials for LTSS provider qualifications. 	CL	11/20/23											
559	LTSS 3, Element A	Scope of review—Documentation	Revise the sentence to read: NCQA reviews the organization’s policies and procedures for managing planned and unplanned care transitions.	CL	11/20/23											
559	LTSS 3, Element A	Explanation—Factor 1	Revise the first sentence to read: The organization’s policies and procedures specify a process to identify members who transition between settings.	CL	11/20/23											
561	LTSS 3, Element A	Explanation—Factor 8	Replace “LTSS 1, Element B, Element C, and Element G” with “LTSS 1, Element F, Element G and Element K” in the third sentence.	CO	11/20/23											
2-23	Appendix 2—Delegation and Automatic Credit Guidelines	Table 3: Automatic credit by Evaluation Option for delegating to an NCQA-Accredited MBHO, or a delegate that is NCQA Accredited in UM, CR or PN or an NCQA-Certified CVO	Add new footnote 21 to row “D” under “CR 1: Credentialing Policies” in Table 3: <table border="1" style="margin-left: 20px;"> <tr> <td>D</td> <td>Credentialing System Controls Oversight</td> <td></td> <td></td> <td></td> <td>Y11</td> <td>Y11</td> <td>Y11</td> <td>Y21</td> <td>Y21</td> <td>Y21</td> </tr> </table> <p>²¹ Automatic credit is available if the delegate is Certified under the 2024 CVO standards and beyond. For the system controls elements (structural requirements), if activities are delegated to an NCQA-Accredited health plan</p>	D	Credentialing System Controls Oversight				Y11	Y11	Y11	Y21	Y21	Y21	CL	11/20/23
D	Credentialing System Controls Oversight				Y11	Y11	Y11	Y21	Y21	Y21						

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			(Table 2), a delegate that is NCQA Accredited in UM/CR (Table 3) or a Certified CVO (Table 3), the organization is not required to provide its own documentation.		