



**For Public Comment**

August 4, 2025

Comments due 11:59 p.m. ET

September 1, 2025

# **Overview of Proposed Updates to 2026 Accreditation Standards:**

***Health Plan  
Behavioral Health  
Case Management for LTSS  
Wellness and Health Promotion***

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# 2026 Accreditations/Certifications/Distinctions in Health Plan, Behavioral Health, LTSS, Case Management-LTSS and Wellness and Health Promotion: *Overview of Proposed Updates*

## About NCQA

NCQA believes that everyone deserves access to and opportunities for better health care, better choices and better health.

NCQA is an independent, nonprofit organization dedicated to improving health care quality. For 35 years, we have driven improvement throughout the health care system, helping to advance the issue of health care quality to the top of the national agenda. NCQA's accreditations, standards and performance measurement tools 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. Today, over 192 million Americans are enrolled in an NCQA-Accredited health plan, and 235 million Americans are enrolled in a health plan that reports measures from NCQA's Healthcare Effectiveness Data and Information Set (HEDIS®), the most widely used performance measurement tool in health care.

## Stakeholders Participating in Public Comment

NCQA shares these proposed updates for public comment to generate thoughtful feedback and constructive suggestions from interested parties. We welcome comments across different perspectives and experiences. Many comments lead to changes in our standards and policies, and the review process makes our standards stronger for all stakeholders. Please consider whether the requirements are feasible as written, are clearly articulated and are valuable to your organization's pursuit of high-quality care or your goals for your (or your community's) care. Please highlight areas that might need clarification.

## Background

NCQA's programs are designed to drive measurable improvement, enhance accountability and promote person-centered care across diverse systems.

- **Health Plan Accreditation**, held by over 1,200 health plans and representing more than 180 million covered lives, sets a nationally recognized standard for quality and operational excellence—supporting continuous improvement in performance and service delivery.
- **Behavioral Health Accreditation**, formerly “Managed Behavioral Health Care Organization Accreditation,” supports behavioral health organizations by establishing standards for integrated, evidence-based, and accessible services. It encourages collaboration across health, behavioral and social support systems to improve care continuity and outcomes.
- **Distinction in Long-Term Services and Supports (LTSS)** supports health plans that provide managed health services and coordinate social services for LTSS. The program's standards can help organizations meet state needs, close quality gaps and support the best care, regardless of setting.
- **Accreditation in Case Management for LTSS** provides a framework of continuous quality improvement for delivery of efficient and effective person-centered care that meets individuals' needs and helps keep them in their preferred setting while aligning with state requirements.

- **Accreditation and Certifications in Wellness and Health Promotion (WHP)** provides an evaluation framework that enables organizations to assess and refine wellness services, align with industry best practices, and demonstrate a commitment to supporting healthier lifestyles and improved population health.

## Evolving Industry Needs

Since January 2025, health care organizations have been navigating a rapidly-evolving policy environment. In response to these changes, in April, NCQA issued temporary scoring modifications for a limited set of Accreditation program requirements, effective through June 30, 2026. Modifications narrowly focus on requirements directly related to federal policy changes regarding diversity, equity, inclusion programs and gender identity.

Modifications issued in April, and those proposed in this memo for surveys beginning July 1, 2026, do not change NCQA's broader commitment to using data-driven methods to identify differences in outcomes and to address barriers that create or exacerbate these differences. Proposed updates seek to align with updates proposed for Health Equity Accreditation, and to respond to the needs, risks and challenges of health care organizations in the evolving policy landscape of 2025, and beyond.

## A Guide to the Updates

Proposed updates seek to mitigate challenges some customers may experience due to federal or state limitations on permissible terminology or activities. They are intended to better explain the purpose and desired outcome of activities scored in 2025 program standards, using language that provides greater flexibility for organizations to interpret and apply activities within their unique regulatory and population-centered contexts. This includes:

- **Reframing activities that require diversity, equity inclusion or demographic representation.** Replace requirements that address diversity or demographic representation of staff, leadership and committees (workforce) with "direct experience, knowledge or expertise relevant to the needs of organization's member or patient population."
- **Focus workforce training on responsive care or service delivery.** Reframe requirements that focus on workforce training for respectful, appropriate and responsive care or service delivery, rather than on reducing bias or promoting inclusion. Updated training options reflect topics commonly applied by current customers, and topics identified through NCQA's literature review and interviews as essential to reducing health disparities.

Tables 1–5 detail proposed updates across programs, rationales and targeted questions. Please also refer to the proposed 2026 Health Equity Accreditation standards referenced in the Rationale and Questions column for the context of proposed updates, which may be referenced in [2026 Health Equity Accreditation: Standards Proposed for Public Comment](#).

## 2026 Accreditations, Certifications and Distinctions: Proposed Updates

### Updates Proposed as Applicable to 2026 Surveys

Refer to: [2026 HP, BH, LTSS, CM-LTSS and WHP: Standards Proposed for Public Comment](#).

**Table 1. Proposed Updates to 2026 Health Plan Accreditation**

Standard/Element		Proposed Update	Rationale
<b>QI 1: PROGRAM STRUCTURE AND OPERATIONS</b>			
E	Developing and Maintaining a Responsive Workforce	<p><b>Update element title</b> from “Promoting Organizational Diversity, Equity and Inclusion.”</p> <p><b>Update factors 1–2</b> language and scope.</p>	<p><b>Align with updates proposed for Health Equity Accreditation</b>, particularly HE 1, Element A: Developing and Maintaining a Responsive Workforce and Element B: Trainings to Improve Care or Service Delivery.</p> <p><b>Adapt to the evolving policy environment.</b> Better describe the intent of activities formerly referenced using broader terminology: developing and maintaining a workforce with direct experience, knowledge or expertise capable of responding to the needs of the organization’s member or patient population—and providing care or services that are respectful, appropriate and responsive.</p> <p><b>Questions:</b></p> <ol style="list-style-type: none"> <li>1. Do you support the revisions and change in scope proposed of factors 1–2?</li> <li>2. Do the proposed revisions make it less feasible for your organization to demonstrate compliance by July 2026?</li> </ol>
<b>PHM 1: PHM STRATEGY</b>			
A	Strategy Description	<p><b>Update factor 6</b> to read, “How the organization <u>promotes health equity addresses health disparities and their root causes.</u>”</p>	<p><b>Adapt to the evolving policy environment.</b> Better describe the intent of activities formerly referenced using broader terminology.</p> <p><b>Question:</b></p> <ol style="list-style-type: none"> <li>3. Do you support the revisions proposed for factor 6?</li> </ol>

Standard/Element		Proposed Update	Rationale
<b>PHM 3: DELIVERY SYSTEM SUPPORTS</b>			
A	Practitioner or Provider Collaboration and Support	<b>Retire factor 4</b> (training on equity, cultural competency, bias, diversity or inclusion). <b>Update Met scoring</b> from 3–4 to 2–3.	<b>Adapt to the evolving policy environment, and respond to feedback from practitioners</b> that these trainings do not support value-based arrangements or payer-practitioner collaboration.  <b>Questions:</b> 4. Do you support retirement of factor 4? 5. Do you support the proposed Met scoring threshold of 2-3 factors? 6. Do the proposed revisions make it less feasible for your organization to demonstrate compliance by July 2026?

**Table 2. Proposed Updates to 2026 Behavioral Health Accreditation**

Standard/Element		Proposed Update	Rationale
<b>QI 1: PROGRAM STRUCTURE AND OPERATIONS</b>			
F	Developing and Maintaining a Responsive Workforce	Update element title from “Promoting Organizational Diversity, Equity and Inclusion.” Update factors 1–2 language and scope.	<b>Align with updates proposed for Health Equity Accreditation</b> , particularly HE 1, Element A: Developing and Maintaining a Responsive Workforce and Element B: Trainings to Improve Care or Service Delivery.  <b>Adapt to the evolving policy environment.</b> Better describe the intent of activities formerly referenced using broader terminology: developing and maintaining a workforce with direct experience, knowledge or expertise capable of responding to the needs of the organization’s member or patient population—and providing care or services that are respectful, appropriate and responsive.  <b>Questions:</b> 7. Do you support proposed updates to the language and scope of factors 1–2? 8. Do the proposed revisions make it less feasible for your organization to demonstrate compliance by July 2026?

Table 3. Proposed Updates to 2026 Distinction in LTSS

Standard/Element		Proposed Update	Rationale
<b>LTSS 1: CORE FEATURES</b>			
A	Program Description	Update factor 6 to read, “How the organization <u>promotes health equity addresses health disparities and their root causes.</u> ”	<b>Adapt to the evolving policy environment.</b> Better describe the intent of activities formerly referenced using broader terminology. <b>Question:</b> 9. Do you support the revision of factor 6?

Table 4. Proposed Updates to Standards for 2026 Accreditation in Case Management for LTSS

Standard/Element		Proposed Update	Rationale
<b>LTSS 1: PROGRAM DESCRIPTION</b>			
A	Program Description	<b>Update factor 6:</b> “How the organization <u>promotes health equity addresses health disparities and their root causes.</u> ”	<b>Adapt to the evolving policy environment.</b> Better describe the intent of activities formerly referenced using broader terminology. <b>Question:</b> 10. Do you support the revision of factor 6?
<b>LTSS 6: STAFFING, TRAINING AND VERIFICATION</b>			
Standard intent		<b>Update</b> to read, “The organization <u>builds a workforce responsive to its population’s needs</u> <del>diverse and inclusive staff</del> , and provides training and oversight to staff so their interactions with individuals are evidence based and supported by professional standards.”	<b>Align with updates proposed for Health Equity Accreditation,</b> particularly HE 1, Element A: Developing and Maintaining a Responsive Workforce and Element B: Trainings to Improve Care or Service Delivery. <b>Adapt to the evolving policy environment.</b> Better describe the intent of activities formerly referenced using broader terminology: developing and maintaining a workforce with direct experience, knowledge or expertise capable of responding to the needs of the organization’s member or patient population. <b>Question:</b> 11. Do you support revisions proposed for the element intent and stem?
A	Building a Responsive Workforce	<b>Update title</b> from “Building a Diverse Staff.” <b>Update stem</b> to read, “The organization has <u>processes to recruit and hire a workforce with direct experience, knowledge or expertise relevant to the needs of its population</u> recruiting	

		and hiring processes that support diversity, equity and inclusion in the organization's workforce."	
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**Table 5. Proposed Updates to Standards for 2026 Accreditation and Certifications for Wellness and Health Promotion**

Standard/Element		Proposed Update	Rationale
<b>WHP 1: Client Organization Engagement</b>			
A	Assessment	Retire factor 7.	<p><b>Adapt to the evolving policy environment.</b> Retire assessment of client's workforce demographics.</p> <p><b>Question:</b></p> <p>12. Do you support retirement of this factor?</p>



## Public Comment Instructions

### Public Comment Questions

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 updates including:

1. Will the proposed updates help your organization meet its objectives or sustain its investments? If so (“support”), how? If not (“do not support”), why not?
2. Are the expectations and scope of requirements feasible?
3. Are the requirements clearly written and framed in a manner representative of the organizations that perform the activities?
4. Do proposed updates to existing requirements substantially change the value, effectiveness, relevance of the required activity?
5. Do proposed updates to existing requirements make it less feasible for your organization to earn Accredited status?
6. What else should NCQA know or consider as it makes decisions about the final standards?

### Documents

[2026 HP, BH, LTSS, CM-LTSS and WHP: Standards Proposed for Public Comment](#) contain the proposed standards updates for 2026 surveys of the Accreditation, Certification and Distinction programs referenced Tables 1-5, highlighted to demonstrate differences between proposed updates and the current program requirements.

Respondents may also refer to [2026 Health Equity Accreditation: Standards Proposed for Public Comment](#) for proposed standards updates referenced in Tables 1-5.

### How to Submit Comments

Respond to topic and element-specific questions for each product on NCQA’s public comment website. 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. Once logged in, scroll down and click **Public Comments**.
3. Click **Add Comment** to open the comment box.
4. Select **Updates to 2026 Accreditation Programs** from the drop-down box.
5. Click to select the **Topic** and **Element** (question) on which you would like to comment.
  - **2026 Health Plan Accreditation.**
  - **2026 Behavioral Health Accreditation (formerly MBHO).**
  - **2026 LTSS Distinction.**
  - **2026 CM-LTSS Accreditation.**
  - **2026 Accreditation and Certifications in WHP.**
  - **Global Questions.**
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 11:59 ET on September 1, 2025.**

## Next Steps

The final Standards and Guidelines for 2026 Accreditations in Health Plan, Behavioral Health, Case Management for LTSS, Distinction in LTSS and Accreditation/Certifications in Wellness and Health Promotion are proposed for release in December 2025, following approval by the NCQA Standards Committee and the Board of Directors.

Requirements for all programs are proposed to take effect for surveys starting July 1, 2026.