

NCQA Corrections, Clarifications and Policy Changes to the 2022 CVO Standards and Guidelines

July 25, 2022

This document includes the corrections, clarifications and policy changes to the 2022 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 2022 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.

Page	Standard/Element	Head/Subhead	Update	Type of Update	IRT Release Date
33	Policies and Procedures—Section 5: Additional Information	Notifying NCQA of a Reportable Event	Add the following as a new third bullet: <ul style="list-style-type: none">• Self-identification of systemic issues affecting 5% or more of eligible credentialing/recredentialing files; for example, late recredentialing.	CL	7/25/22
33	Policies and Procedures—Section 5: Additional Information	Notifying NCQA of a Reportable Event	Revise the second paragraph to read: Reporting obligations are effective upon issuance of the notice of sanctions, issuance of a fine or request for corrective action, or self-identification of issues. The notification requirement is not paused as a result of any appeal or negotiations with the applicable regulatory authority.	CL	7/25/22
33	Policies and Procedures—Section 5: Additional Information	Notifying NCQA of a Reportable Event—Annual Attestation of Compliance With Reportable Events	Revise the information in this section to read: On an annual basis, the organization must also complete an attestation signed by an officer or other authorized signatory of the organization affirming that it has notified NCQA of all Reportable Events specified within NCQA policies and procedures. Failure to comply with Reportable Events submission or annual attestation requirements may result in suspension or revocation of Certification status. Annually, NCQA sends an email reminder to the designated Accreditation contact to complete the annual attestation My NCQA (https://my.ncqa.org). The attestation must be completed within 30 days of the email notification.	CL	7/25/22

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33	Policies and Procedures— Section 5: Additional Information		<p>Add the following new section head and text between “Notifying NCQA of a Reportable Event” and “Discretionary Survey.”</p> <p>Interrater Reliability</p> <p>NCQA strives for consistency in the Accreditation/Certification process and across all surveys.</p> <p>NCQA defines “interrater reliability” (IRR) as the extent to which two or more independent surveyors produce similar results when assessing whether the same requirement is met—the level of confidence that similarly trained individuals would be likely to produce similar scores on the same standards for the same product when the same evidence is evaluated.</p> <p>To support consistency, NCQA will continue to clarify standards and educate surveyors. Organizations preparing for survey should also review all applicable standards, including changes between standards years and related NCQA corrections, clarifications, and policy changes, as well as FAQs, focusing on the standards’ intent, scored elements and factors, explanations, and type of evidence (data sources) required to demonstrate that a requirement is met.</p> <p>Reporting IRR Issues to NCQA</p> <hr/> <p>Report suspected IRR issues to NCQA during the following survey stages:</p> <ul style="list-style-type: none"> • When the organization responds to initial issues (following the conference call with the surveyor and ASC). • During the organization review and comment stage (during the post-survey review process). • During a Reconsideration (after the survey is completed). <p>Issues may be reported in the survey tool (IRT) or by submitting a case to My NCQA (https://my.ncqa.org).</p> <p>To protect the integrity of the Accreditation process, NCQA does not accept materials in an IRR report that did not exist at the time of the original completed survey tool submission.</p> <p>As a reminder, file review results may not be disputed or appealed once the onsite survey is complete, whether completed in-person or virtually. If you suspect an IRR issue related to a file review element, the issue should be reported during the onsite survey.</p>	CL	7/25/22

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			<p>NCQA performs an expedited review of reported IRR concerns on non-file review elements to ensure timely and accurate Accreditation/ Certification decisions. Based on review of a potential issue, NCQA may:</p> <ol style="list-style-type: none"> <i>If NCQA's scoring was inconsistent for non-file review elements</i>, issue a one-time exception for scoring of the standard, and require a Corrective Action Plan (CAP). NCQA reserves the right to determine if scoring was inconsistent. <i>If no inconsistency is found</i>, maintain the standard score. <p>NCQA analyzes IRR information to identify opportunities to clarify requirements or enhance surveyor education.</p>		
37	Policies and Procedures—Section 5: Additional Information	Suspending Certification	<p>Revise the first sentence under the “Grounds for immediate suspension” subhead to read:</p> <p>Grounds for recommending suspension of a Certification status include, but are not limited to:</p>	CL	7/25/22
37	Policies and Procedures—Section 5: Additional Information	Suspending Certification	<p>Add the following as a new sixth bullet under the “Grounds for immediate suspension” subhead:</p> <ul style="list-style-type: none"> Failure to comply with Reportable Events submission or annual attestation completion requirements. 	CL	7/25/22
37	Policies and Procedures—Section 5: Additional Information	Revoking Certification	<p>Revise the fifth bullet under “Grounds for revocation” to read:</p> <ul style="list-style-type: none"> The organization violates other published NCQA policies, including failure to submit Reportable Events or completion of annual attestation. 	CL	7/25/22
55	CVO 3, Element B	Explanation—Factor 6: Annually monitoring credentialing process	<p>Revise the fourth subbullet in the second paragraph to read:</p> <ul style="list-style-type: none"> If the organization conducts auditing as the method for monitoring: <ul style="list-style-type: none"> All noncompliant modifications must be reviewed if the organization's system can identify noncompliant modification. Sampling is allowed only if the organization does not use a credentialing system that can identify all noncompliant modifications. 	PC	7/25/22
56	CVO 3, Element C	Explanation	<p>Revise the second paragraph to read:</p> <p>Factor 2 is a critical factor; if this critical factor is scored “no” the organization's score cannot exceed 0% for the element.</p>	CL	7/25/22

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90	CVO 15, Element C	Stem	<p>Replace “annually” with “at least annually” in factor 5 to read:</p> <p>5. At least annually, the organization monitors the delegate’s credentialing system security controls to ensure that the delegate monitors its compliance with the delegation agreement or with the delegate’s policies and procedures.</p>	CO	7/25/22
92	CVO 15, Element C	Explanation—Factor 5: Annual monitoring of CR systems	<p>Replace “annually” with “at least annually” in the first paragraph to read”:</p> <p>The organization’s process for monitoring system security controls covers delegates that store, create, modify or use credentialing or recredentialing data on its behalf. If the organization contracts with such delegates, it has a process for:</p> <ul style="list-style-type: none"> • Monitoring the delegate’s credentialing system security controls in place to protect data from unauthorized modification, as outlined in CVO 3, Element B (Credentialing System Controls), factor 4, at least annually. • Ensuring that the delegate monitors, at least annually, that it follows the delegation agreement or its own policies and procedures. 	CO	7/25/2022
5-1	Appendix 5—MAC Policy	The MAC Policy	<p>Replace the first two sentences with the following text:</p> <p>This Merger, Acquisition and Consolidation Policy (“MAC Policy”) applies to all CVOs Certified by NCQA. NCQA evaluates transactions involving Certified organizations to determine if they impact the scope of review under NCQA’s CVO Certification standards.</p>	CO	7/25/22
7-3	Appendix 7—Glossary		<p>Add the following as a new definition:</p> <p>interrater reliability: The extent to which two or more independent surveyors produce similar results when assessing whether the same requirement is met—the level of confidence that similarly trained individuals would be likely to produce similar scores on the same standards for the same product when the same evidence is evaluated.</p>	CL	7/25/22

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PREVIOUSLY POSTED UPDATES					
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3-1	Appendix 3— HP Delegation and Automatic Credit Guidelines	Definitions	<p>Add the following as a new definition:</p> <p>Previously unidentified delegate</p> <p>A contracted delegate identified during a survey that was not initially reported by the organization in the NCQA delegation worksheet.</p>	CL	3/28/22
3-5	Appendix 3	How NCQA Evaluates Delegation— Delegation oversight—De facto delegation	<p>Revise the following subhead and first paragraph to read:</p> <p>Previously unidentified delegates and de facto delegation</p> <p>If NCQA identifies previously unidentified delegates or de facto delegation at any point after selecting the delegates (including during the offsite survey), NCQA reserves the right to review oversight of the previously unidentified delegates or de facto delegates by selecting them at random to include up to two delegates in addition to the four originally selected.</p>	CL	3/28/22