

# NCQA Corrections, Clarifications and Policy Changes to the 2023 HPA Standards and Guidelines

November 14, 2022

This document includes the corrections, clarifications and policy changes to the 2023 HPA 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.
- 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 2023 HPA 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
17	Policies and Procedures	Eligibility for Accreditation	<p>Add the following new subhead and text at the end of “Eligibility for Accreditation.”</p> <p><b>Eligibility for international organizations</b></p> <p>NCQA standards evaluate performance of U.S. health care organizations and their U.S. operations only. Organizations that apply for and participate in an NCQA Survey must agree to comply with all applicable U.S. federal, state and other applicable laws, and must agree that the use of NCQA products and services shall for all purposes be governed, interpreted, construed and enforced solely and exclusively in accordance with U.S. laws and regulations, without regard to conflicts of law provisions thereof.</p> <p>NCQA limits evaluation to organizations that operate in and outside the United States, and limits award of NCQA status to an organization’s U.S. operations. Organizations that do not operate in the United States (i.e., conduct all activities in the U.S., including in states and territories; conduct operations for U.S. members and clients) or have members, patients or clients in the United States are not eligible for NCQA Health Plan Accreditation. NCQA does not evaluate operations of organizations that do not operate in the United States, or that do not have U.S. members, patients or clients.</p> <p>When determining eligibility of an organization with both U.S. and foreign operations, NCQA applies the following criteria:</p> <ol style="list-style-type: none"> <li>1. The applicant organization must be the accountable (responsible) entity for performing NCQA-reviewed functions, and must describe how it meets NCQA’s definition of an accreditable, certifiable or eligible entity. A parent, holding or shell company may not be eligible to apply.</li> </ol>	CL	11/14/22

## NCQA Corrections, Clarifications and Policy Changes to the 2023 HPA Standards and Guidelines

**November 14, 2022**

Page	Standard/Element	Head/Subhead	Update	Type of Update	IRT Release Date
			<p>2. The applicant organization must be a U.S. company, or be owned by a U.S. company, and provide services in the United States. An applicant organization that is not a U.S. company, but is owned by a U.S. company, must be domiciled in the United States by holding a business license or registration in at least one U.S. state or territory. The organization must submit evidence to reflect incorporation, registration or licensure to satisfy this criterion.</p> <p>3. To be listed on NCQA's public report card, the applicant organization must have a United States address for a facility, business office or administrative location. NCQA does not allow organizations to list an address of a personal residence or U.S. statutory agent unless the organization conducts NCQA-reviewed functions from the address.</p> <p>4. If any function to be reviewed is performed outside the United States, the organization must have the capability to complete the onsite survey (and/or any tour) virtually, and to present all required files electronically. Because NCQA does not travel outside the country for onsite reviews, the applicant organization must coordinate a virtual review to satisfy onsite requirements, which may include staff interviews or site tours, as described in NCQA standards. All virtual reviews must be conducted in English or with English translations for the NCQA survey team.</p> <p>5. The applicant organization must meet all other eligibility criteria specified in the preceding section.</p> <p>Any organization with U.S. and foreign operations that meets the criteria above may apply for an NCQA Survey, and may include functions performed outside the United States in its NCQA Survey.</p>		
127	PHM 1, Element A	Summary of Changes	<p>Remove the following SOC:</p> <ul style="list-style-type: none"> <li>Replaced “informing members” with “informing targeted members” in the first sentence under “Factor 5: Informing members.”</li> </ul>	CO	11/14/22
128	PHM 1, Element A	Look-back period	<p>Revise the look-back period for Renewal Surveys to read: <i>For Renewal Surveys:</i> 24 months; 12 months for factor 6.</p>	CO	11/14/22
132	PHM 1, Element B	Summary of Changes	<p>Replace the summary of changes text with the following language:</p> <ul style="list-style-type: none"> <li>Added “Artificial intelligence, interactive contact” as the last bullet under “Interactive contact.”</li> </ul>	CO	11/14/22
149	PHM 3, Element A	Summary of Changes	<p>Add the following text as a bullet in the Summary of Changes.</p> <ul style="list-style-type: none"> <li>Revised the look-back period for First and Renewal Surveys from “prior to the survey date” to “6 months” for factor 6.</li> </ul>	CL	11/14/22

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

## NCQA Corrections, Clarifications and Policy Changes to the 2023 HPA Standards and Guidelines

**November 14, 2022**

Page	Standard/Element	Head/Subhead	Update	Type of Update	IRT Release Date
372, 378	UM 12, Elements B and D	Exception	Revise the exception to read: Factors 2 and 3 are NA if the organization did not identify any date modifications that do not meet the organization's policies and procedures or if all identified date modifications met the organization's policies and procedures.	PC	11/14/22
385	UM 13, Element C	Scope of review	Revise the fifth paragraph under "Documentation" to read: <i>For First Surveys and Renewal Surveys:</i> <ul style="list-style-type: none"> <li>• <i>For factor 5:</i> NCQA also reviews the organization's documentation and the delegate's documentation as evidence for monitoring for system controls.</li> <li>• <i>For factor 6:</i> NCQA also reviews the organization's documentation for taking action (or plans to take action) and for implementation of its quarterly monitoring process, as applicable.</li> </ul>	CL	11/14/22
406	CR 1, Element D	Exception	Revise the exception to read: Factors 2 and 3 are NA if the organization did not identify any modifications that do not meet the organization's policies and procedures or if all identified modifications met the organization's policies and procedures.	PC	11/14/22
441	CR 8, Element C	Scope of review	Revise the fifth paragraph under "Documentation" to read: <i>For First Surveys and Renewal Surveys:</i> <ul style="list-style-type: none"> <li>• <i>For factor 5:</i> NCQA also reviews the organization's documentation and the delegate's documentation as evidence for monitoring for system controls.</li> <li>• <i>For factor 6:</i> NCQA also reviews the organization's documentation for taking action (or plans to take) and implementation of its quarterly monitoring process, as applicable.</li> </ul>	CL	11/14/22
600	MED 5, Element B	Scope of review	Revise the scope of review to read: <i>This element applies to Interim Surveys, First Surveys and Renewal Surveys.</i> NCQA reviews evidence that: <ul style="list-style-type: none"> <li>• The organization shared its standards for maintaining and sharing health record information with practitioners and providers during the look-back period.</li> <li>• Practitioners and providers shared health records, as appropriate, in accordance with professional standards, during the look-back period.</li> </ul>	CL	11/14/22