

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

July 29, 2024

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
24	Policies and Procedures— Section 2: Accreditation Scoring and Status Requirements	Option to decline Accreditation status	<p>Revise the section head “Option to decline Accreditation status” to “Option to decline Accreditation status (applicable only to First Survey Evaluation Option)”; revise the text to read: Organizations surveyed under the First Survey Evaluation Option may select one of the following options:</p> <ol style="list-style-type: none"> 1. Accept the resulting Accreditation status. 2. Decline the resulting Accreditation status (without penalty and undergo a Follow-Up Survey within 12 months of receipt of the final report survey report). <p>If an organization has reason to believe that the scoring of any standard does not accurately reflect its survey performance, the organization may request Reconsideration. If the organization decides to request Reconsideration, it must do so before sending notice to NCQA of a decision to decline its status. Refer to <i>Reconsideration</i>.</p> <p>The organization may accept or decline the resulting Reconsideration status decision. If the organization decides to decline the status, it must undergo a Follow-Up Survey within 12 months. Organizations have 30 calendar days from receipt of the results to reply to NCQA with their decision to accept, decline or request Reconsideration of the resulting status.</p>	CL	7/29/24

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39	Policies and Procedures— Section 2: Accreditation Scoring and Status Requirements	Other Information NCQA May Consider	<p>Add the following new section head and text between “Other Information NCQA May Consider” and “Notification to Regulatory Agencies.”</p> <p>Responsible Use of Artificial Intelligence</p> <p>NCQA supports the use of technological advancements that improve the quality and equity of health care operations and delivery. Artificial intelligence may be useful in this regard, but there are risks to consider and mitigate. Many AI frameworks have been established to address these risks. The White House also issued an executive order with broad guiding principles, and specific health care industry roles, for the Department of Health and Human Services.</p> <p>NCQA expects organizations that use AI to implement a framework and policies that are fair and equitable to members. Although NCQA does not mandate use of a specific AI framework, the NIST AI Risk Management Framework, a key reference in the executive order, may be helpful. The Coalition for Health AI is also a useful resource.</p> <p>NCQA may consider use of AI in determining Accreditation/Certification status, even though current NCQA standards do not specifically address AI. For example, with regard to utilization management, NCQA standards require appropriately licensed professionals (not AI) to make medical necessity denial decisions. Other activities that require human decision making, and where AI is used, may be an area for NCQA to consider.</p>	CL	7/29/24
41	Policies and Procedures— Section 3: The Survey Process	Survey process results	<p>Revise the second paragraph to read:</p> <p>The organization may only use results from the readiness evaluation for internal business purposes (to examine, review and otherwise analyze its business operations), and may not use, disclose, represent or otherwise communicate these results to any third party for any other purpose. The ROC reviews the preliminary results with all relevant information to determine Accreditation. NCQA does not allow the release of preliminary results to third parties as representative of the survey results or findings which are presented in the final report. The organization may not use reports or numeric results to represent that it is NCQA Accredited without a final NCQA Accreditation decision, as described above.</p>	CL	7/29/24
43	Policies and Procedures— Section 3: The Survey Process	Offsite review	<p>Revise the section to read:</p> <p>The organization must submit a complete survey tool (including self-assessed scores and supporting evidence) to NCQA on the scheduled survey start date (submission date).</p> <p>The survey team conducts an initial review of all information and evidence submitted, and documents findings and questions in the survey tool. During a survey conference call with the survey team, the organization has the opportunity to address surveyor questions and initial findings. The organization may also submit additional supporting evidence, if needed to resolve outstanding issues. Any additional supporting evidence must be submitted by the due date for</p>	CL	7/29/24

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			<p>submitting responses to the survey team’s outstanding questions and initial findings. The organization may not introduce new evidence after this point in the survey process.</p> <p>The organization should not attach documents to the survey tool that contain protected health information (PHI) or other personal identifiable information (PII), as defined by the Health Insurance Portability and Accountability Act (HIPAA) and implementing regulations. If original documentation contains PHI or PII, the organization must de-identify the information prior to submission. Refer to “de-identify” in <i>Appendix 4: Glossary</i>.</p> <p>All documentation provided to NCQA during the survey process must be in English, or with English translation.</p>		
47	Policies and Procedures— Section 3: The Survey Process	Documents dated after submission	<p>Revise the section to read:</p> <p>The organization may only submit information that existed at the time of the original survey submission; it may not introduce information that did not exist at the time of the original survey submission.</p> <p>Evidence submitted in response to the survey team’s initial questions and findings must have existed at survey submission. The organization may not alter or update evidence to address an issue, but may bookmark or highlight this information.</p>	CL	7/29/24
47	Policies and Procedures— Section 3: The Survey Process	Onsite review	<p>Revise the section to read:</p> <p>The onsite review date is usually scheduled for 7 weeks after submission of the survey tool.</p> <p>The onsite review is primarily a file review, but might also require review of additional information, staff interviews or system queries.</p> <p>The onsite survey can be conducted either in person or virtually, depending on the organization’s preferences and ability to present files electronically.</p> <p>The onsite review must be conducted in English, and all records or files that are part of the review must be provided in English, or with English translation.</p>	CL	7/29/24
49	Policies and Procedures— Section 3: The Survey Process	Comments about errors or omissions	<p>Revise the section to read:</p> <p>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 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 provided in response to initial survey team issues. NCQA only considers comments and supporting evidence that are related to factual errors or omissions in the preliminary report and based on information and evidence presented during the survey.</p>	CL	7/29/24

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51	Policies and Procedures— Section 3: The Survey Process	Materials not accepted during Reconsideration	<p>Revise the section to read:</p> <p>To protect the integrity of the Accreditation process, NCQA does not accept materials during Reconsideration that did not exist at the time of the original completed survey tool submission. The organization may not submit—and the Reconsideration Committee does not consider—documentation that represents actions taken by the organization after it submitted the survey tool. The organization may not introduce new or additional supporting evidence that was not available during the survey (i.e., with original submission of evidence, or in response to the survey team’s questions and initial findings).</p>	CL	7/29/24																																
3-8	Appendix 3— MAC Policy	Table 2: 2024 LTSS Distinction Standards for MAC Survey	<p>Update the LTSS table to read:</p> <p>Table 2: 2024 LTSS Distinction Standards for MAC Survey</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2" style="background-color: #333; color: white; text-align: center;">2024 Standards/Elements</th> </tr> </thead> <tbody> <tr> <td colspan="2" style="background-color: #eee;">LONG-TERM SERVICES AND SUPPORTS</td> </tr> <tr> <td colspan="2">LTSS 1: Core Features</td> </tr> <tr> <td style="width: 30px; text-align: center;">A</td> <td>Program Description</td> </tr> <tr> <td style="text-align: center;">B</td> <td>Service Authorization</td> </tr> <tr> <td style="text-align: center;">C</td> <td>Notification of Service Authorization</td> </tr> <tr> <td style="text-align: center;">D</td> <td>Demographic Data Collection</td> </tr> <tr> <td style="text-align: center;">E</td> <td>Privacy Protections for Data</td> </tr> <tr> <td style="text-align: center;">F</td> <td>Assessment of Health, Functioning and Communication Needs</td> </tr> <tr> <td style="text-align: center;">G</td> <td>Resource Assessment</td> </tr> <tr> <td style="text-align: center;">H</td> <td>Comprehensive Assessment Implementation</td> </tr> <tr> <td style="text-align: center;">I</td> <td>Person-Centered Assessments</td> </tr> <tr> <td style="text-align: center;">J</td> <td>Person-Centered Care Planning Process</td> </tr> <tr> <td style="text-align: center;">K</td> <td>Implementing the Care Planning Process</td> </tr> <tr> <td colspan="2">LTSS 3: Care Transitions</td> </tr> <tr> <td style="text-align: center;">A</td> <td>Process for Transitions of Care</td> </tr> </tbody> </table>	2024 Standards/Elements		LONG-TERM SERVICES AND SUPPORTS		LTSS 1: Core Features		A	Program Description	B	Service Authorization	C	Notification of Service Authorization	D	Demographic Data Collection	E	Privacy Protections for Data	F	Assessment of Health, Functioning and Communication Needs	G	Resource Assessment	H	Comprehensive Assessment Implementation	I	Person-Centered Assessments	J	Person-Centered Care Planning Process	K	Implementing the Care Planning Process	LTSS 3: Care Transitions		A	Process for Transitions of Care	CL	7/29/24
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	All		Replace references to “Appendix 5: Glossary” with “Appendix 4: Glossary” throughout the publication.	CO	11/20/23
6	Overview	Notable Changes and Clarifications to the Standards and Guidelines	Remove the following notable change for LTSS 2, Element B that reads: Revised the look-back period to “prior to the survey date” for All Surveys.	CL	3/25/24
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
25	Policies and Procedures—Section 2: Accreditation Scoring and Status Requirements	Follow-Up Survey (<i>applies to First Evaluation Option</i>)	Replace “effective date” with “expiration date” in the last sentence of the third paragraph to read: The expiration date of the Accreditation status is the date specified in the Full Survey decision that precipitated the Follow-Up Survey.	CL	3/25/24
25	Policies and Procedures—Section 2: Accreditation Scoring and Status Requirements	Resurvey (<i>applies to First and Renewal Evaluation Options</i>)	Replace “effective date” with “expiration date” in the last sentence of the third paragraph to read: The expiration date of the Accreditation status is the date specified in the Full Survey decision that precipitated the Resurvey.	CL	3/25/24
27	Policies and Procedures—Section 2: Accreditation Scoring and Status Requirements	Add-On Survey (<i>applies to First and Renewal Evaluation Options</i>)	Replace “effective date” with “expiration date” in the first sentence in the fifth paragraph to read: The expiration date of the Accreditation status for the new product line through an Add-On Survey aligns with the current Accreditation earned during the most recent Full Survey.	CL	3/25/24
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.	CL	11/20/23

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			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.		
46	Policies and Procedures—Section 3: The Survey Process	Survey Results and Scoring—Comments about errors or omissions	<p>Revise the text to read:</p> <p>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 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>	CL	11/20/23
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

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90	QI 1, Element D	Scoring	E-PUBLICATION VERSION ONLY EDIT Revise the scoring table to read as follows: <table border="1" style="margin-left: 20px; width: 100%;"> <thead> <tr> <th style="width: 33%;">Met</th> <th style="width: 33%;">Partially Met</th> <th style="width: 33%;">Not Met</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">The organization meets 4-5 factors</td> <td style="text-align: center;">The organization meets 3 factors</td> <td style="text-align: center;">The organization meets 0-2 factors</td> </tr> </tbody> </table>			Met	Partially Met	Not Met	The organization meets 4-5 factors	The organization meets 3 factors	The organization meets 0-2 factors	CO	3/25/24
Met	Partially Met	Not Met											
The organization meets 4-5 factors	The organization meets 3 factors	The organization meets 0-2 factors											
93	QI 1, Element E	Scope of review—Documentation	Replace “policies and procedures” with “policies and procedures or materials” in the first bullet.			CL	11/20/23						
138	PHM 2, Element B	Explanation	Replace “at least annually” with “annually” in the first paragraph of the Explanation.			CL	3/25/24						
296	UM 5, Element E	Related information—Extension conditions	Revise the first bullet under “Extension conditions” to read: The organization may extend the decision notification time frame if the request to extend urgent concurrent care was made less than 24 hours prior to, or any time after, the expiration of the previously approved period or number of treatments. The organization may treat the request to extend urgent concurrent care as urgent preservice and send a decision notification within 72 hours.			CL	3/25/24						
374	UM 1, Element A	Summary of changes	Revise the bullet to read: <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	Add the following language as a new fourth paragraph: For mail service delegates only, the organization may submit the delegate’s timeliness report of mail distribution in lieu of an audit.			CL	11/20/23						
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						

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

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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
435	CR 8, Element C	Explanation—NCQA-Accredited/Certified delegates	Revise the third paragraph under NCQA-Accredited/Certified delegates to read: Automatic credit for factors 5 and 6 is available if all delegates are NCQA Accredited under 2022 (or later) standards for Health Plan Accreditation, MBHO Accreditation, UM-CR-PN Accreditation or for NCQA Certified CVOs under the 2024 (or later) standards.	CL	3/25/24
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
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

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538	LTSS 1, Element M	Scope of review—Documentation	<p>Revise the first paragraph to read: <i>For All Survey Types:</i> NCQA reviews the organization’s policies and procedures for factors 1-4.</p> <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
541	LTSS 2, Element A	Look-back period	<p>Revise the look-back period for Renewal Surveys to read: <i>For Renewal Surveys:</i> At least once during the prior year.</p>	CO	3/25/24
559	LTSS 3, Element A	Scope of review—Documentation	<p>Revise the sentence to read: NCQA reviews the organization’s policies and procedures for managing planned and unplanned care transitions.</p>	CL	11/20/23
559	LTSS 3, Element A	Explanation—Factor 1	<p>Revise the first sentence to read: The organization’s policies and procedures specify a process to identify members who transition between settings.</p>	CL	11/20/23
561	LTSS 3, Element A	Explanation—Factor 8	<p>Replace “LTSS 1, Element B, Element C, and Element G” with “LTSS 1, Element F, Element G and Element K” in the third sentence.</p>	CO	11/20/23
676	MA 7, Element E	Factor 1	<p>Revise factor 1 to read: 1. Practice guidelines and utilization management guidelines are based on current evidence in widely used treatment guidelines or clinical literature.</p>	CL	3/25/24
677	MA 7, Element E	Explanation—Factor 1	<p>Revise the factor 1 Explanation to read: Factor 1: Guidelines based on clinical evidence The organization’s QI Committee or other designated clinical committee approves clinical practice guidelines. The organization adopts guidelines from recognized sources. It uses one of the following in adopting its clinical practice guidelines:</p> <ul style="list-style-type: none"> • Current evidence in widely used treatment guidelines, or • Clinical literature. 	CL	3/25/24

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697	MA 20, Element A	Explanation—Factor 8	<p>Revise the factor 8 Explanation to read:</p> <p>Factor 8: Serving a diverse membership</p> <p>The program description outlines the organization’s approach to address the cultural and linguistic needs of its membership. The description must also include how the organization incorporates activities that reduce disparities in health and health care. These activities must be broadly accessible irrespective of race, ethnicity, national origin, religion, sex, or gender. These activities may be based upon health status and health needs, geography, or factors not listed in the previous sentence only as appropriate to address the relevant disparities in health and health care.</p> <p>The QI program description includes other objectives the organization deems appropriate.</p>	CL	3/25/24												
734	SNP 2, Element A	Explanation	<p>Revise the second paragraph in the Explanation to read:</p> <p>The organization conducts an initial and annual health risk assessment using a comprehensive health risk assessment tool and ensures results from the initial assessment and annual reassessment conducted for each member enrolled in the plan are addressed in the member’s individualized care plan as required under 422.101(f)(1)(i) and 422.101(f)(1)(ii).</p> <p>Beginning January 1, 2024, the comprehensive risk assessment tool must include one or more questions on each of the following domains:</p> <ul style="list-style-type: none"> • Housing stability. • Food security. • Access to transportation. 	CL	3/25/24												
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	<p>Add new footnote 21 to row “D” under “CR 1: Credentialing Policies” in Table 3:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%;">D</td> <td style="width: 35%;">Credentialing System Controls Oversight</td> <td style="width: 5%;"></td> <td style="width: 5%;"></td> <td style="width: 5%;"></td> <td style="width: 5%;"></td> <td style="width: 5%;">Y¹¹</td> <td style="width: 5%;">Y¹¹</td> <td style="width: 5%;">Y¹¹</td> <td style="width: 5%;">Y²¹</td> <td style="width: 5%;">Y²¹</td> <td style="width: 5%;">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 (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.</p>	D	Credentialing System Controls Oversight					Y ¹¹	Y ¹¹	Y ¹¹	Y ²¹	Y ²¹	Y ²¹	CL	11/20/23
D	Credentialing System Controls Oversight					Y ¹¹	Y ¹¹	Y ¹¹	Y ²¹	Y ²¹	Y ²¹						