



NCQA is seeking comments on 2011 Draft Accountable Care Organizations (ACO) Criteria. Reviewers are asked to submit their comments in writing via the public comment Web site by **5:00 p.m. (EST) on Friday, November 19, 2010.**

1. [2011 ACO Public Comment Overview](#)
2. [NCQA 2011 ACO Criteria](#)
3. [Appendix A: ACO Measure Table](#)
4. [All 2011 ACO Public Comment documents \(aggregate of items 1,2, and 3\)](#)

While submitting comments, we encourage you to provide thoughts and insight on the following issues related to the ACO criteria:

1. For each individual standard and element please provide feedback on whether you believe it reflects a core capability that all ACOs should possess.
2. Should the types of specialists that should be included in the ACO be specified in the criteria? If so, must they be part of the organization's legal structure (i.e. subject to the direct authority of the ACOs governance)?
3. We are proposing four levels of scoring for ACOs. What capabilities would you expect to see for each ACO level?
4. Does the eligibility criteria capture the organization types that have the capability to act as ACOs (i.e. provide the full continuum of services, coordinate care, manage resources effectively, report performance)? Should additional arrangements or structures be considered?
5. How might currently available measures such as HEDIS, Meaningful Use, and California IHA (listed in Appendix A) Do the criteria align with stakeholder expectations for ACOs? Are there gaps or areas not addressed but should be?
6. For organizations seeking to become ACOs: Does your organization have materials/documents, etc. to demonstrate compliance with the criteria? If not, which areas are challenging?
7. Are there critical functions not included in the current draft standards?

## Submitting Comments

Submit all comments via NCQA's Public Comment Web site: <http://publiccomments.ncqa.org/>. Note: NCQA will no longer accept comments via mail, e-mail or fax.

## How to Submit a Comment

To enter comments:

- Go to the Public Comment database
- Enter your e-mail address and contact information.
- Select Accountable Care Organizations (ACO) 2011
- Select the Topic, Standard and Element you would like to comment on.
- Select your support option (e.g., Support, Do not support, Support with modifications, Other).
- If you choose Do not support, include your rationale in the text box. If you choose Support with modifications, enter the suggested modification in the text box.

**There is a 1,800 character limit for each comment. If you exceed this limit, your comment will be cut off at 1,800 characters. Please try to be brief and to the point in your feedback.**

We suggest that you develop your comments in Word, in order to check your character limit and save a copy for reference. Use the "cut and paste" function to copy your comment into the text box.

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