



# Top 10 Changes in CMS Final Rule on Accrediting Organizations and Conflicts of Interest

June 16, 2026

## Executive Summary

CMS has finalized a major rule strengthening federal oversight of Medicare-approved accrediting organizations. The rule is aimed primarily at improving the reliability, consistency, and independence of AO surveys that allow hospitals and other providers to be “deemed” compliant with Medicare participation requirements. The most important changes affect AO conflicts of interest, consulting arrangements, survey comparability, psychiatric hospital surveys, validation surveys, and the treatment of providers that have been terminated from Medicare or Medicaid.

## Top 10 Changes

### **1. CMS will require AOs to use Medicare conditions as the minimum accreditation standard.**

Accrediting organizations that accredit Medicare-certified providers and suppliers must incorporate the applicable Medicare Conditions of Participation, Conditions for Coverage, Conditions for Certification, or other Medicare requirements as the minimum baseline for accreditation. AOs may still impose higher standards, but they cannot use accreditation standards that fall below Medicare requirements.

### **2. AOs must submit detailed crosswalks showing how their standards match Medicare requirements.**

CMS is strengthening the requirement that AOs provide a crosswalk between their accreditation standards and the applicable Medicare conditions. This is intended to make it easier for CMS to determine whether AO standards truly meet or exceed Medicare requirements.

### **3. CMS will require greater comparability between AO surveys and State agency surveys.**

AOs must make their survey processes more comparable to those used by CMS and State survey agencies. This includes documentation on survey procedures, complaint investigations, survey reports, survey review processes, correction of noncompliance, surveyor training, survey team composition, and accreditation decision-making.

### **4. AO surveyors must complete applicable CMS online surveyor training.**

CMS is requiring AO surveyors to complete CMS online basic surveyor training applicable to the provider or supplier type they survey. This is designed to reduce inconsistency between AO surveyors and government surveyors.

### **5. CMS is imposing new conflict-of-interest policies on AOs.**

AOs must submit policies and procedures explaining how they will prevent and address conflicts of interest. These policies must address separation of consulting and accreditation services, protection of accreditation integrity, conflicts involving AO owners, surveyors, and employees, and notification to CMS when conflicts are discovered.

**6. AOs will be restricted from providing fee-based consulting to providers they accredit at sensitive times.**

CMS is finalizing restrictions on AO fee-based consulting. AOs may not provide consulting before an initial accreditation survey, during the 12 months before a scheduled reaccreditation survey, or in response to a complaint involving the provider or supplier. CMS says this still allows consulting during the first 24 months of a typical 36-month accreditation cycle, but blocks consulting when it is most likely to create an actual or perceived conflict.

**7. AOs must maintain written “firewall” policies separating consulting from accreditation.**

AOs that provide fee-based consulting must have written firewall policies and procedures to prevent comingling of consulting staff, activities, and information with accreditation staff and activities. CMS is finalizing this to protect the independence of accreditation decisions.

**8. AO owners, surveyors, and employees are barred from participating in surveys where they have a relationship with the facility.**

If an AO owner, surveyor, or employee has had an interest in or relationship with a facility within the prior two years, that individual may not participate in the facility’s survey, have input into survey or accreditation results, participate in pre- or post-survey activity, or access survey records for that facility.

**9. CMS is revising the psychiatric hospital survey process.**

CMS is integrating psychiatric hospital survey oversight more closely with the acute care hospital survey process. AOs with approved hospital programs will need to include psychiatric hospital requirements in their hospital accreditation programs so that psychiatric hospital quality and safety are reviewed in a more systematic and integrated way.

**10. Terminated deemed providers will face stricter re-entry limits.**

If Medicare terminates a provider or supplier’s participation agreement, CMS will no longer recognize that provider’s AO accreditation for deemed compliance. A terminated provider seeking re-entry must come under State agency oversight for a reasonable assurance period and remain under that oversight until CMS determines full compliance and approves a new participation agreement. AOs must also agree to terminate or revoke accreditation within five business days after CMS notifies them that a provider or supplier has been involuntarily terminated.

**Bottom Line**

This rule significantly reduces the independence AOs historically had in designing their own accreditation processes. CMS is moving toward a more federally controlled accreditation framework in which AOs must align more closely with Medicare standards, State survey agency processes, CMS training, CMS validation methods, and CMS conflict-of-interest safeguards. For hospitals and health systems, the most practical impacts will be tighter scrutiny of deemed status, greater consistency between AO and government surveys, more limits on AO consulting relationships, and more serious consequences if a provider is terminated from Medicare or Medicaid.

**Source**

Centers for Medicare & Medicaid Services, “Medicare Program; Strengthening Oversight of Accrediting Organizations (AOs) and Preventing AO Conflicts of Interest, and Related Provisions,” Final Rule with Comment Period, Federal Register, Vol. 91, No. 115, June 16, 2026. Effective date: June 16, 2027.