

Covered California - Public Comment Form  
Application Plan Year 2019

Application/Appendix/Attachment	Section	Page Number	Comment	Covered California Response
Application	Applicant Health Plan Proposal	16	4.3 should have date updated to January 1, 2019 (currently has the 2018 date from last year)	Change has been accepted.
Application	Benefit Design	20	5.9 was removed for returning applicants but should be required SERFF submission for All Applicants	Change has been accepted.
Application	Audits and Review	34	9.4.8 asks if an external audits for claims administration was done on the entire book of business (2016 /2017)-- can you clarify what type of external audit you are looking for as this was not asked last year (example Regulatory audit, Financial audits)	Question 9.4.8 concerns all types of external audits having to do with claims administration. The question has been updated for clarity.
Application	Healthcare Evidence Initiative	40	12.1 required compliance date is 7/1/2018 for all contracts to be updated with this language, will not be completed within this timeline.	Change has been accepted.
Application	Network Offerings	53	16.1.2 drop down response needs date changed to 2019	Change has been accepted.
Application	Network Stability HMO	54	16.2.3.7 numbered twice missing 16.2.3.6	Change has been accepted.
Application	Health Technology (Telehealth and Remote Monitoring)	98	18.8.1 the table has been converted to 4 columns from 6 last year, the instructions for completing the table was not updated to match the changes in the table.	Change has been accepted and updates were made to the question to correctly reference the updated table.
Application	Health and Wellness	107	18.9.10 Need to update the date in row 4 and row 8 to 2017 (still shows 2016)	Change has been accepted.
Application	QIS for Appropriate Use of	123	19.2.5.3 is missing the word count	Change has been accepted.
Application	QIS for Patient Centered	125	19.2.7.2 is listed twice with different questions, correcting will require 19.2.7.3 to change to 19.2.7.4	Change has been accepted.
Attachment - E QIS Run Charts	19.2.6.1		19.2.6.1 please split into HMO and PPO tabs	Change has been accepted.
Attachment - E QIS Run Charts	19.2.6.2		19.2.6.2 please split into HMO and PPO tabs	Change has been accepted.
Attachment - E QIS Run Charts	19.2.5.2		19.2.5.2 please split into HMO and PPO tabs	Applicant can indicate if payment strategy applies to a certain product in table for 19.2.5.2; additional tabs will not be created.
Attachment - E QIS Run Charts	19.2.3.3		19.2.3.3 please split into HMO and PPO tabs	Applicant can indicate if payment model applies to a certain product in table for 19.2.3.3; additional tabs will not be created.

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Application	1.6	9	Please consider adding a statement before the New Applicant Entrants paragraph: If a currently contracted QHP Issuer is planning system or resource changes that will impact 2019 operations, including Open Enrollment, currently contracted QHP Issuer must update the applicable section(s) of the QHP Certification Application.	Information referenced is addressed through the implementation plan a new entrant Applicant is required to submit in 6.2.1.
Application	4.3	16 (footer)	Please consider rephrasing "2018" to "2019" in the first sentence: Final negotiated and accepted premium proposals shall be in effect for coverage effective January 1, 2018.	Change has been accepted.
Application	6.1.2.1 (New Question)	21	Please consider adding a new All issuer question: Does Applicant have operation resources dedicated strictly to the Exchange? (200 words)	Designated operation resources are addressed in Section 2, Administration and Attestation, and Section 6, Operational Capacity. The Exchange does not require dedicated operation resources.
Application	7.15 (new question)	26	Please consider adding a new All issuer question: The Exchange expects all Applicants to promote enrollment and payment option enhancements that improve the enrollee service experience. List any significant enhancements made within the last 12 months and the options the Applicant provides to the consumer for submitting premium.	This will be addressed as part of the work plan for the Consumer Experience Work Group, and will not be addressed through the Certification Application at this time.
Application	8.6 (new question)	27	Please consider adding a new All issuer question: a) What percentage of enrollee applications with and without binder payment are effectuated electronically? b) What is Applicant doing to increase effectuation rates?	Increasing effectuation rates will be addressed as part of the work plan for the Consumer Experience Work Group, and will not be addressed through the Certification Application at this time.
Application	16.2.3.7	61 (footer)	There are two 16.2.3.7 questions. Please consider changing the first question numbering to 16.2.3.6 as that number appears to be missing.	Change has been accepted.
Application	16.5	76-84 (footer)	Please clarify if the questions apply only to the new network(s) a currently contracted QHP is considering or if the questions apply to both existing networks AND the new network(s) a currently contracted QHP is considering.	Change has been accepted and Section 16 instructions have been updated for clarity.
Application	18.1	General Comment	Please confirm that commercial accreditation continues to be an acceptable proxy for exchange plans/products.	Confirmed.
Application Legend	General Comment	General Comment	Thank you for recognizing the relationships Covered California has with currently contracted QHPs by reducing the application questions. We also appreciate the easy to follow Legend that was created to assist with the draft Certification Application review.	You're welcome!

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Application	2- Administration and Attestation	11	The 2019 Application legend indicates that only sections 2.1 and 2.4 are required for currently contracted QHP issuers. The subheading in the application states "2.1-2.4 required for currently contracted QHP Issuers." Please clarify which questions Applicants will be responsible for answering in Section 2, <b>Administration and Attestation</b> .	Change has been accepted; Certification Application instructions have been updated to state, "2.1 and 2.4 ..."
Application	4.3 Preliminary Premium Proposals	16	First sentence regarding premium proposals effective date indicates premiums shall be in effect for coverage date of January 1, 2018- please update to reflect 2019.	Change has been accepted.
Application	16.2.3.7 Network Stability	61	There are two questions with the same question number (16.2.3.7), please update application with corrected question numbers.	Change has been accepted.
Application	18.7.1 Mental and Behavioral Health Management	97	We request clarification that includes a definition of what Covered California considers an integrated behavioral health-medical model to ensure we answer appropriately.	Change has been accepted; Certification Application question has been updated to define integrated behavioral health-medical model as, "as defined and recognized by Applicant".
Application	18.11.7 At-Risk Enrollees	114	Please clarify whether information on at-risk enrollees would be a requirement in the course of business as usual, with the movement and transfers of individuals between QHPs, or would this scenario come into play in the event of carrier market exit?	Question is not a statement of requirement.
Application	1.7	11	For the 2018 recertification application, Sections 18 and 19 were completed as separate submission due in July. The plan requests consideration for later, staggered submission for Sections 18 and 19.	Submission of all sections will be due May, 1.
Application	4.3	17	Question 4.3 states the following: "Final negotiated and accepted premium proposals shall be in effect for coverage effective January 1, 2018." A correction is recommended to state "January 1, <u>2019</u> ."	Change has been accepted.
Application	16.5.2.1	79	The question asks "Does Applicant track procedure volume per facility for the above mentioned conditions?" However, the above only mentions procedures (cancer surgeries, cardiac procedures and transplants), not <i>conditions</i> . There is a distinction between the two terms. The plan recommends the inclusion of a specific list of conditions for this requirement.	Change has been accepted; "conditions" changed to "procedures".
Application	16.2.3.7	Page 61	There are two questions listed under 16.2.3.7 instead of 16.2.3.6.	Change has been accepted.