

Quality Transformation Initiative (QTI) Memo

July 2026

The purpose of this Quality Transformation Initiative (QTI) memo is to:

1. Provide an update on the Centers for Medicare & Medicaid Services (CMS) Final 2026 Call Letter as it relates to the Childhood Immunization Status (CIS-E) measure.
2. Confirm Covered California's position and requirements for CIS-E under the QTI for Measurement Years 2026–2028.

CMS Final 2026 Call Letter Decision

In the Final 2026 Call Letter, CMS did not finalize the full removal of CIS-E and IMA-E from the QRS measure set. The following summarizes CMS's final determinations:

CMS Will:

- Continue to require QHP issuers to report CIS-E and IMA-E data for the 2026 ratings year.
- Maintain CIS-E and IMA-E in the QRS measure set and allow optional submission through NCQA's Interactive Data Submission System (IDSS) beginning with the 2027 ratings year.
- Continue to provide measure benchmarks and performance information in the CSV version of the QRS Proof Sheets.

CMS Will Not:

- Finalize full removal of CIS-E and IMA-E from the QRS measure set as originally proposed.
- Include CIS-E and IMA-E in the calculation of QRS scores and ratings for the 2026 ratings year, per the QRS and QHP Enrollee Survey: Technical Guidance for 2026.
- Include optionally submitted CIS-E and IMA-E data in QRS scoring for the 2027 ratings year or beyond.

Covered California QTI Requirements for MY2026–2028

Consistent with the 2026–2028 QHP Issuer Contract, CIS-E (Childhood Immunization Status: Combination 10) remains a QTI Scored Measure for Measurement Years 2026–2028, weighted at 15% of the total QTI at-risk amount. CMS's decision to move CIS-E to optional federal reporting does not affect Covered California's contractual requirements.

QHP Issuers are required to submit CIS-E data through NCQA's IDSS to support benchmark reporting and data consistency.

QHP issuers are also required to submit CIS-E data via the Patient-Level Data (PLD) file to support QTI assessment for MY2026–2028. This requirement is independent of CMS federal QRS scoring and is grounded in the QHP Issuer Contract.

Benchmark

Covered California will establish the MY2026-2028 QTI benchmark for CIS-E using the 25th and 66th CMS QRS national percentile benchmarks based on Measurement Year (MY) 2025 data. These benchmarks will remain static for the duration of the 2026–2028 contract period.

MY2025 benchmark data will be available in August 2026 via the CMS QRS Proof Sheets and confirmed in October 2026 via the Public Use Files (PUF).

References:

- Covered California 2026–2028 Individual Market QHP Issuer Contract – 2026 Plan Year – Attachment 4: https://hbex.coveredca.com/financial-reports/2026-2028_QHP-IND_Att-4_8-1-25_Clean-Final.pdf
- Final 2026 Call Letter for the Quality Rating System (QRS) and Qualified Health Plan (QHP) Enrollee Experience Survey: <https://www.cms.gov/files/document/final-2026-call-letter-quality-rating-system-qrs-qualified-health-plan-qhp-enrollee-experience.pdf>