

Responses to Comment Cycle 2 - Draft 2025 QDP Issuer Contract Amendment for Individual and Small Group Markets

Article	Section	Comment	Response
	General	Even though the use of “material concerns” is not new, we think it is ambiguous and respectfully request it be clarified by having the phrase defined	Covered California does not believe a further definition of the term “material concern” is necessary at this time. No change will be made.
1	1.15	We respectfully request that "within 48 hours of receiving them from State and Federal Regulators" is changed to days (as defined) to avoid vagueness.	Covered California does not believe this existing standard has caused confusion. No change will be made.
2	2.2.4	We request a more detailed termination reason be included in the 834.	This should not affect the current contract language in the Model Contract. Covered California will discuss the request separately with the Carrier. No change will be made.
3	3.2.2.2	We respectfully request the off-exchange reference in 3.2.2.2 be removed.	Section 3.2.2.2 c) will continue to include off-exchange individual market efforts in regards to Contractor's marketing plans as it has in past years. No change will be made.