

Article	Section #	Comment	Covered California Response
1	1.9	We advocate for and respectfully request that "preliminary or" be removed.	The added language to Section 1.9 was intended to restate the existing requirement in Section 1.5(e). Covered California is removing the added language in Section 1.9 because it may be interpreted too broadly, but reminds carriers of the existing requirement under 1.5(e).
1	1.15	We advocate for and respectfully request that "preliminary or" be removed.	The added language to Section 1.15 restates the existing requirement in Section 1.5(e). Existing language in Section 1.15 requires reporting to Covered California of any material concerns that may impact performance under the Agreement. Consistent with existing Section 1.5(e), if any such concerns results in a regulatory report, the report shall be provided to Covered California within 48 hours. If Contractor requests confidential treatment for any information it provides, Covered California shall treat the information as confidential, consistent with Section 1.4.1. No change will be made.
8	3.2.b	Please provide context/explanation for why the last sentence in 8.3.2 b was deleted.	Removed by mistake. This will not be deleted.
14	Definitions	There is a footnote in the table indicating that what constitutes a material violation is determined by Covered California in its sole discretion and in consultation with the appropriate health insurance regulator. Please advise what constitutes a material statutory or regulatory violation.	Covered California declines at this time to further advise on what may constitute a material statutory or regulatory violation. Please see Section 4.1.1 for more information on the participation standard requiring QDP issuers to be licensed and in good standing.