

Article	Section #	Comment	Covered California Response
4	4.3.2	<p>4.3.2 Network Adequacy - Contractor's QHPs shall comply with the <u>network adequacy standards established by Covered California</u> and the applicable State Regulators.</p> <p>Recommendation: Please provide additional details regarding Covered California's established network adequacy standards and they do not appear to be included in the contract or referenced as to where they can be found for review. Is the intention to follow the federal standards as documented in NBPP, or adopt DMHC's standards? We recommend that Covered California apply for the exception to allow the State Regulator to review for network adequacy.</p>	<p>Amendments to Section 4.3.2 are meant to capture Covered California's role in ensuring network adequacy standards in close partnership with state regulators. Carriers continue to be subject to the robust network adequacy requirements imposed by their state regulators. Covered California will communicate with carriers immediately should there be any additional requirements beyond those imposed by state law.</p>
4	4.3.4	<p>4.3.4 Essential Community Providers (newly added to the CCSB contract)</p> <p>Recommendation: Additional clarification is being requested to understand why this section was recently added to the CCSB contract. Implications a networks available on CCSB are also used for commercial / other lines of business. Need clarification of requirements/process for requesting and complying under the Alternate Standards. We would like to recommend possible working sessions to understand how to request approval under the alternate standard process.</p>	<p>Essential community provider requirements are a certification standard that applies to all QHPs, including those offered through CCSB. Consistent with federal regulations, the alternative standard is available only to QHP issuers using an integrated delivery system. QHP issuers that believe they are eligible for the alternative standard would indicate this on their certification application. Covered California anticipates making additional substantive amendments to these essential community provider requirements based on ongoing analytic research in the next few weeks.</p>