

Article	Section #	Comment	Covered CA Response
4	4.3.4	4.3.4 Essential Community Providers (newly added to the CCSB contract)  <b>Recommendation:</b> 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.	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.