

Article	Section #	Comment	Covered CA response
5	5.2.2	In light of OHCA requirements to reduce costs, we ask Covered CA to reconsider the QTI penalty timeline and maximum.	Thank you for your feedback regarding the OHCA requirements and the QTI penalty timeline and maximum. The amount at risk for MY2026 will be up to 2.8% of premium, recognizing the critical importance of reducing disparities and emphasizing that quality cannot exist without equity. When the program was developed, the intent was to gradually increase the amount at risk by 1% each year. It is important to note that the current amount is already a compromise, as we are not increasing it to 3.8% in 2026, which was initially considered.
5	5.2.4	Please clarify what changes were made in reference to the Round 1 comment response "Covered California has revised the proposed language to emphasize the potential use of MPL Action Plans to address clinically significant measures persistently scoring below the 25th percentile." We recommend adding additional language that clarifies that the potential use of the MPL. For example, "upon request, Contractor must may be required to submit a Quality Improvement Plan or Minimum Performance Level Action Plan.	Thank you for your feedback. The clarifying language regarding the potential use of MPL Action Plans was inadvertently omitted and has now been corrected. The updated language specifies that MPL Action Plans may be required for measures persistently scoring below the 25th percentile, as originally intended. We appreciate your attention to this detail and your partnership in advancing quality improvement.
4	4.3.4	Due to challenges in contracting with various provider categories such as FQHCs, state-owned family planning sites, free clinics, and Community Health Centers, continues to cause concerns with plans meeting the minimum number in our network. It is requested that Covered California hold a workshop on ECP requirements. This workshop would provide an opportunity for carriers to raise questions and concerns, fostering a collaborative approach to addressing our concerns.	Thank you for your valuable suggestion. Currently, we are focused on ensuring that Issuers and all stakeholders are well-informed about the proposed changes and updates related to Essential Community Providers (ECP) requirements. Your engagement is crucial to us as we navigate these updates, and we look forward to further dialogue and your continued collaboration.