

Section #	Comment	Covered CA Response
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><b>Recommendation:</b> 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. It is our understanding that the NBPP requirement for the Exchange to determine Network Adequacy does not apply the QDP, only to QHP - recommendation is to remove "established by Covered California" from the QDP contract.</p>	<p>The Exchange network adequacy standards apply to stand-alone dental plans. Section 45 CFR § 155.1050(a)(2) references the network adequacy exception available for QDPs under 156.230(a)(4) in several places in the regulation. 156.230(a)(4) is a limited exception to the network adequacy standards that all QHPs must meet for stand-alone dental plans that sell in areas where it is prohibitively difficult for the issuer to establish a network of dental providers. HHS discussed in the preamble that the SBE network adequacy standards must include dental plans and emphasized that this limited exception must be available. Amendments to this section are meant to capture Covered California’s role in ensuring network adequacy standards in close partnership with state regulators. Covered California will communicate with QDP issuers should there be any efforts to develop additional requirements beyond those imposed by state or federal law.</p>