

**Cover Page**

**Covered California QDP Individual Issuer Contract for  
Individual and Small Business Market**

**Attachment 1: Advancing Equity, Quality, And Value**

**Response to Comments**

The following is the Covered California response to “Cycle 2” comments received for the 2024-2026 QDP Individual Issuer Contract, Attachment 1.

All documents will be posted to the Plan Management HBEX webpage:  
<https://hbex.coveredca.com/stakeholders/plan-management/>.

Article	Section #	Other Document Cross-Ref	Comment Date	Comment	Covered California Response
Article 1 - Equity and Disparities Reduction	1.03.1	Attachment 1	1/26/23	In addition to the contractual requirements outlined under "1) Health Equity Capacity Building," Contractor's progress reports should be publicly reported.	Covered California will continue to publicly report plan performance on health equity and disparity reduction requirements and existing contract language already allows for reporting out elements of Contractor's progress reports.
Article 1 - Equity and Disparities Reduction	1.04	Attachment 1	1/26/23	Contractor's annual report demonstrating compliance of Cultural and Linguistic Competence should be made publicly available.	Covered California will continue to publicly report plan performance on health equity and disparity reduction requirements and existing contract language already allows for reporting out elements of Contractor's progress reports.
Article 2 - Population Health	2.01.1	Attachment 1	1/26/23	We are disappointed to see that requirements have been narrowed for only a select group of populations ("children, adolescents, and members with disabilities"), rather than all members.	Covered California is committed to supporting QDP issuers in developing comprehensive population health assessment and management strategies and has prioritized vulnerable enrollee populations in the initial contract requirements as dental plan issuers and dental providers expand these capabilities.
Article 2 - Population Health	2	Attachment 1	1/26/23	We are disappointed to see the removal of the population health management plan and strategy requirements.	Covered California is committed to supporting QDP issuers in developing comprehensive population health assessment and management strategies and has prioritized contractual requirements for enrollee engagement and data exchange and submission that are foundational to these activities.
Article 3 - Health Promotion and Prevention	3.01	Attachment 1	1/26/23	We are against the removal of 5)c) under 3.01 "Dental Plan Benefits and Services Communication," as preventive services are necessary for good oral health. Preventive oral healthcare is key to developing good habits and improving overall health. Access to preventive dental care helps to decrease oral health disparities, and can help prevent additional costs such as emergency room visits for preventable dental conditions. Contractor should be required to report on how it promotes preventive care and services.	Covered California agrees with the value and benefits of preventive services in oral health. We continue to require QDP issuers to report on this topic for utilization, communication of benefits, and member education.
Article 3 - Health Promotion and Prevention	3.02	Attachment 1	1/26/23	"Contractor shall ensure contracted dentists screen and refer Covered California Enrollees <i>who report</i> tobacco use to their Health Plan and Primary Care Physician (PCP) to determine the best treatment options" -- we believe that all patients should be screened for tobacco use, and if dentists determine that tobacco is being used, they should refer their patient to their PCP, not <i>only</i> when the patient reports tobacco use themselves.	Covered California agrees with your recommendation and we will adjust the language to reflect all patients should be screened for tobacco use.

Article	Section #	Other Document Cross-Ref	Comment Date	Comment	Covered California Response
Article 3 - Health Promotion and Prevention	3.02 3.03	Attachment 1	1/26/23	We do not support the removal of 2b) and 4c) - requirements of the Contractor to report the number and percent of Covered California Enrollees who use tobacco and the number and percent of its pregnant Covered California Enrollees with periodontitis. Removing these requirements removes a measure of accountability from the Contractor. Additionally, reporting of this data would be helpful to understand trends in oral healthcare in CA.	Covered California understands the importance of QDP issuer accountability and will consider additional reporting requirements. We will continue to monitor trends in oral healthcare of our enrollees via analysis of reported HEI data.
Pregnancy	3.03		1/26/23	Practice Management systems in dentistry do not support tracking of pregnancy. There is no established payment structure/coding for it either. These requirements are not feasible. Dentists can educate patients and refer them to their OB. We can support our providers with education materials. However, tracking and reporting regarding pregnancy is not doable.	Covered California understands the limitations of current dental practice. However, we believe that dentists should be able to indicate positive or negative pregnancy status in a patient chart, and update as needed. We will consider language adjustments to better define our definition of tracking accordingly.
Pregnancy	Article 3 3.03 1)		1/26/2023	We respectfully request that Section 1 of Article 3.3.03 be removed. Sections 2 and 3 support the dental requirements for Pregnancy and reference similar requirements to Section 1 that are unclear.	Covered California understands the limitations of current dental practice. However, Section 1 serves to require screening and recording positive or negative pregnancy status in a patient chart. We will adjust the language to clearly define our this intent.