Application/Appendix/Attachment	Section	Page Number	Comment	Covered California Response
Application- Individual and CCSB	5.8	21	Applicant proposes submitting a representative sample of EOCs to Covered California, rather than every EOC, because EOC language in many plans is exactly the same (other than cost share). Along with the sample EOCs, we will provide Covered California with a chart that explains how we selected the sample EOCs and what language is used in each EOC. The plan names in the attached file are for 2018 coverage. We will update the plan names as needed for 2019 coverage once the plan names are finalized for 2019.	Covered California for Small Business will not accept representative samples of Evidence of Coverage (EOC). Applicants are required to submit drafts of all EOCs. This draft language must be submitted with responses to the Certification Application.
Application	1.7 Key Dates	10	Completed Applications Due (include **2019 proposed plans, benefits and networks**) Rates are not due until 7/25. Last year all SERFF Templates (benefits, network, pharmacy and rates etc,) were submitted in July. This page and the sections throughout the application referencing SERFF submissions (except for Rates) seem to require submission on 5/1. For our SERFF submission we run the data integrity tool and cross validate all data (Product, Network, Service Area and Rates). This ensures our rates template has accounted for all plans/HIOS and variations. Without all of the templates being submitted at the same time we widen the risk of having inconsistencies that would result in the need to resubmit. Secondly, there may need to be a "work around" on the SERFF platform to submit the package without Rates which CovCa would need to supply formal guidance on how this should be done. In current state, the platform requires a file to be in the rate binder in order for the initial submission to finalize. **Recommend:** Require all SERFF templates be submitted in July and not staggered. Update all SERFF submission questions to reflect that they will be submitted vs. have been uploaded if they are not due until July.	For CCSB, SERFF templates will be due in July and the Certification Application will reflect this submission due date.
Application	5.8	21	New requirement to Redline version of the EOC and Schedule of Benefits that indicates changes from previous year. This was not required last year, or required for Individual Market and is a tremendous amount of work to do for each and every plan being offered. **Recommend** this requirement be removed from the application submission - as QHPs are already required to provide the EOCs later. Or, make this requirement only for new products or new QHPs.	The question was reviewed by the Plan Management Division and has been updated. See changes.
Application	5.9	21	**Recommend:** Submisison of the Prescription Drug Template through SERFF should be required for all applicants not just new entrants	This question is required for all Applicants.

Application	16.1.3	54	Drop down indicates that the SERFF network template needs to be attached to the application **Recommendation:** Update the drop down to indiciate "will be uploaded to SERFF" instead	Certification Application response option to question 16.1.3 has been updated.
Attachments - B-C1-C2-D2-D3-G-CCSB-QHP.xls	C1 and C2	Tab 2 and 3	Looks like Tab G Alternate Plan Design has somehow bled over to tab C1 and C2 Rows 15 and 16 have the region replaced with text from Deductible Row 16 doesn't inlcude a county Row 19 and 20 have the region replaced with text regarding brand pharmacy Row 22 and 23 have the region replaced with text regarding MOOP Row 54 and 55 have the region replaced with text regarding Emergency Room Row 55 doesn't include a county **Recommendation:** clean up the region and county input for the rows listed above.	Applicants will be able to complete attachments in Excel.

Attachments - B-C1-C2-D2-D3-G-CCSB-QHP.xls	D3	Tab 5	D3 is an Individual Applicaiton Requirement but is not a requirement for CCSB **Recommendation:** remove D3	The requirement and Attachment D3 is unique for each market.