

## Quality Transformation Initiative (QTI) Memo

October 2025

The purpose of this Quality Transformation Initiative (QTI) memo is to:

1. Confirm the Premium Percent At Risk for Measurement Year (MY) 2025 at 2.3%.
2. Provide details on the MY 2025 QTI Assessment parameters by measure.
3. Confirm the continuation of the Childhood Immunization Status Combo 10 (CIS10) Allowance Program under the same parameters as MY2024.

### MY2025 QTI Percent At Risk

Under the 2023-2025 Qualified Health Plan (QHP) Issuer Contract<sup>1</sup>, QHP issuers are subject to potential payment obligations for quality and health equity performance, with maximum obligations beginning at 1% of total gross premium per product and increasing annually up to 3% over the contract period, and up to 4% in future contract years. Attachment 4 (Section 1.02)<sup>2</sup> specifies that for MY2025, the full per-measure QTI payment is equal to up to 2.8% of total gross premium per product, divided equally by each reportable QTI Core Measure for that product.

**For MY2025, the premium percent at risk is 2.3% of total gross premium per product.** This amount maintains momentum on quality improvement efforts and supports continued progress across all QTI measures, encouraging performance above the 66th percentile, while remaining responsive to broader market dynamics and challenges that may influence issuer performance.

### MY2025 QTI Assessment: Final Parameters by Measure

The following outlines the final parameters for the MY2025 QTI Assessment.

- **Controlling Blood Pressure (CBP)**  
Controlling Blood Pressure remains part of the MY2025 HEDIS® for QRS<sup>3</sup> specifications and continues as a CMS-endorsed measure. There are no deviations from standard reporting requirements. Consistent with the 2023-2025 contract program guidelines, the QRS percentile static benchmark for this measure is based on MY2021.
- **Diabetes Control (Glycemic Status Assessment for Patients with Diabetes – GSD)**  
For MY2025, QTI will assess the Glycemic Status <8.0% indicator. Although the QRS version of HEDIS® removed the <8.0% indicator, QTI reporting will continue to use HEDIS® MY2025, Volume 2 specifications<sup>4</sup>. To maintain alignment in diabetes management reporting, issuers are required to report GSD <8.0% via the QTI Patient-Level Data (PLD) file. Consistent with the 2023-2025

contract program guidelines, the QRS percentile static benchmark for this measure is based on MY2021.

- **Colorectal Cancer Screening (COL)®**

For MY2025, QTI assessment of colorectal cancer screening is limited to the 51–75 age band. Issuers must still submit data for the full 46–75 age range in the QTI PLD file. Covered California will extract the 51–75 cohort for QTI scoring. Please note that QTI scoring may differ from CMS QRS calculations. For specifications, refer to the MY2023 HEDIS® specifications for QRS<sup>5</sup> and the MY2023 HEDIS® QRS Technical Update<sup>6</sup>, which include clarifications on age banding. Consistent with the 2023-2025 contract program guidelines, the QRS percentile static benchmark for this measure is based on MY2021.

- **Childhood Immunization Status (CIS10)®**

CMS QRS has confirmed the transition of the Childhood Immunization Status (CIS) measure to the ECDS (Electronic Clinical Data Systems) reporting method beginning in MY2025. However, for QTI assessment, Covered California will continue to use the MY2024 HEDIS® for QRS<sup>7</sup> specifications and will apply the MY2022 static benchmark for scoring. Please note that QTI scoring may differ from CMS QRS calculations. Issuers must submit CIS10 data as part of their QTI PLD file submission.

## **QTI PLD Submission Timeline**

Issuers must submit QTI PLD files by **June 30, 2026**, including patient-level data for:

- Controlling High Blood Pressure (CBP) – CBE ID #0018
- Glycemic Status Assessment (GSD <8.0%) – CBE ID #0575
- Colorectal Cancer Screening (COL) – NQF #0034
- Childhood Immunization Status (CIS10) – CBE ID #0038

All other MY2025 PLD measures outlined in Article 1 must be submitted separately by July 15, 2026.

## **Continuation of the CIS10 Allowance Program for MY2025**

Covered California will continue the Childhood Immunization Status Combo 10 (CIS10) Allowance Program for MY2025 with no changes to parameters from MY2024.

The CIS10 Allowance Program was developed based on clinically appropriate and evidence-based immunization recommendations, including immunization catch-up schedules. The program allows QHP issuers to submit supplemental data for any denominator-eligible child who has completed the full CIS10 immunization series, including cases where one or more vaccines were administered within 180 days after the child's second birthday.

### **Key Allowance Parameters:**

- Extended Administration Window: Immunizations must be administered up to 180 days after the child's second birthday to qualify.
- Rotavirus Vaccine Exception:
  - Dose 1 must be administered by 15 weeks of age
  - Final dose (either 2nd or 3rd) must be administered by 8 months of age
- Audit Provisions: All supplemental data remain subject to audit.
- Applicable Dates of Service: Immunizations administered between January 1, 2023, and June 29, 2026 qualify under the 180-day extension allowance.

### **Submission Process:**

The submission process remains unchanged. Issuers participating in the CIS10 Allowance Program must complete and submit the CIS10 Allowance Program template via the secure extranet portal by **June 30, 2026**. Results from the CIS10 Allowance Program are **used for QTI assessment purposes only**.

## References:

<sup>1</sup>2025 Plan Year Amendment to the Covered California Qualified Health Plan Issuer Contract for 2023-2025 for the Individual Market [2025-Amend QHP-IND Contract 8-1-24 Clean-Final.pdf](#)

<sup>2</sup>Attachment 4 to Covered California 2023-2025 Individual Market QHP Issuer Contract: Quality Transformation Initiative [2025-Amend QHP-IND Att-4 8-1-24 Clean-Final.pdf](#)

<sup>3</sup>[MY 2025 HEDIS® for QRS](#) (2026 Quality Ratings System Measure Technical Specifications)

<sup>4</sup>HEDIS® MY 2025, Volume 2 Technical Update 2025-03-31, page 135-141

<sup>5</sup>[MY 2023 HEDIS® for QRS](#) (2024 Quality Rating System Measure Technical Specifications)

<sup>6</sup>[Measurement Year \(MY\) 2023 HEDIS® for the Quality Rating System \(QRS\): Technical Update](#)

<sup>7</sup>[MY 2024 HEDIS® for QRS](#) (2025 Quality Ratings System Measure Technical Specifications)

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