

## **Cover Page**

### **Qualified Health Plan Attachment 7 Response to Comments**

The following is the Covered California response to comments received after the January Board meeting release of contract documents for the draft 2022 Qualified Health Plan Model Contract Amendment for the Covered California Small Business Market.

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

**COMMENT TEMPLATE - Attachment 7 QHP Issuer 2022 Contract Amendment, COVERED CALIFORNIA SMALL BUSINESS MARKET**

A7 Item #	A7 Sub-Section #	Comment	Covered CA Response
1, 5, 7, 11, 14	1.01, 5.02, 7.02, 7.03, 7.04, 11.02, 14.01	<p>We respectfully request to have a waiver added for CCSB for the following requirements:</p> <ul style="list-style-type: none"> <li>• 1.01.2 This requirement was previously only for the Individual Market and does not align with the CCSB Attachment 14 draft.</li> <li>• 5.02.2 This requirement was previously only for the Individual Market and is not appropriate for Group members.</li> <li>• 7.02 PCP assignment is not required for CCSB.</li> <li>• 7.03 PCP assignment is not required for CCSB.</li> <li>• 7.04 PCP assignment is not required for CCSB.</li> <li>• 11.02 This requirement was previously only for the Individual market. The cost-estimator tool is costly and under-utilized.</li> <li>• 14.01 This requirement is not appropriate for the Group market. Low income members in need of screening are enrolled in Individual plans where they can obtain a subsidy.</li> </ul>	<p>1.01.2 - Covered California will continue to waive this requirement for CCSB plans.                      5.02.2 - Covered California will not waive this requirement for CCSB plans. At-risk CCSB members should supported when transitioning between health plans. CCSB will work with plans to meet this requirement.                      7.02, 7.03, 7.04 - Covered California will continue to waive these requirements for CCSB plans.                      11.02 - Covered California will continue to waive this requirement for CCSB plans.                      14.01 - Covered California will waive this requirement for CCSB plans in 2022. Covered California intends to move towards standardized screening for all individual and CCSB enrollees in the future. Low wage workers in CCSB plans may have to make decisions between rent and food, medicine, or other needs even though they are fully employed. Standardized screening will help address social needs for all enrollees.</p>
1	1.01.2	<p>Under some of Article 1's sections a note has been added that the requirements do not apply to the CCSB line of business at this time (1.02.3 and 1.03.3). However, this wasn't added under 1.01 Demographic Data Collection and indicates that the contractor must have 80% self-identification of race and ethnicity for the CCSB population. CCSB does not collect or provide this data on the enrollment files submitted to carriers. Any data collected on this population is being done after enrollment.</p> <p>Recommendation to add " While the Contractor builds its small group business, requirements included in this section will not be applied to the CCSB line of business." statement to this requirement; Require CCSB begin collecting this data through the application process, and include it on the enrollment files to the carrier.</p>	<p>Covered California will continue to waive the requirement under 1.01.2 for CCSB plans in 2022.</p>
4,5	4.03.3, 5.01	<p>Please confirm that the aggregated QRS reporting, inclusive of IEX and CCSB, meets these requirements.</p>	<p>Yes, aggregated QRS reporting meets these requirements.</p>

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A7 Item #	A7 Sub-Section #	Comment	Covered CA Response
Multiple		<p>This note was removed from the introduction of Attachment 7 and placed under items 1.02.3, 1.03.3, 7.01.4, Article 8, Article 9, 10.02.4, 10.03.3, 10.04.5, 11.01.3, 15.02.4 and 15.03.3, "The Contractor agrees that improving data exchange among providers is an important reform to improve quality and change the delivery system. The Contractor will make good faith efforts to improve data exchange through collaborative efforts and strategic decisions for its other products and lines of business. While the Contractor builds its small group business, requirements included in this section will not be applied to the CCSB line of business."</p> <p>For those sections that do not contain this note, the requirements are mirroring the Individual Market without taking into consideration current CCSB performance, national benchmarks or a rigorous evaluation process as described would happen in the 2017-2021 Contract "Covered California and Contractor will work to build membership for CCSB, and as membership grows, these requirements may apply in future years. When quality and delivery system reform requirements apply in future years, success will depend on establishing targets based on current performance, national benchmarks, and the best improvement science conducting rigorous evaluation of progress and adjusting goals annually based on experience." CCSB has not held any meetings with the QHP's to walk through which of these requirements are being applied to CCSB, or to establish appropriate targets that can adjust annually.</p> <p>Recommendation: Prior to finalizing this contract hold meetings with the CCSB QHP's to align on which requirements are appropriate for this market and what the performance standards should be. Ensure CCSB is supporting these requirements as well as the QHPs (e.g. 1.01.2 collecting race and ethnicity data as part of the enrollment process and sending to the QHPs.) in meeting these requirements.</p>	<p>Covered California has re-evaluated the requirements that apply to CCSB issuers under Attachment 7. We will continue to waive many requirements for CCSB issuers in 2022 and develop a more robust engagement process for the 2023 Attachment 7 Refresh to expand the number of requirements that apply to CCSB issuers.</p>