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QDP Model Contract(s) First Round Comments

The following is the Covered California response to "First Round" comments received for the 2023 Amendment QDP Model Contract Attachment 7 and Attachment 14 for the Individual and Small Business Markets.

All documents will be posted to the Plan Management HBEX webpage:

<https://hbex.coveredca.com/stakeholders/plan-management/>

Article	Section #	Comment	Response
A7 - 1	1.03 (3)	<p>We recognize the importance of having self-identified Race & Ethnicity data, and firmly believe the best opportunity to capture this information is during the application/enrollment process. Covered California should update the enrollment process to capture DECLINE TO STATE and make these fields mandatory in the GI enrollment process, and drive improved data collection via prompts during the enrollment workflow. QHP outreach for members to collect this data can be expected to drive lower member satisfaction (particularly if members decline to state, but that information is not shared with QHPs), and will crowd out other pressing member outreach efforts, while increasing administrative costs.</p>	<p>At this time, Covered CA guidance on race/ethnicity categories aligns with the Office of Management and Budget (OMB) directive. As efforts to further standardize race/ethnicity categories at the federal level take place, Covered CA will reassess our approach to improve our application process. Additionally, federal and state law prevents Covered California from making the race/ethnicity fields required on the Single Streamlined Application because race and ethnicity are not factors in the eligibility and enrollment process for Medi-Cal or CCA, and the application cannot collect information beyond the minimum necessary for enrollment. Covered CA will continue to explore opportunities to improve capture of member self-identified race and ethnicity data and transmit that information to Issuers in the 834 file. No contract change will be made.</p>
A14	Group 5	<p>Group 5 indicates that the completed questions are to be submitted to Covered California by February 28 of the contract year in an electronic format to be determined by Covered California. Everything in the Group 5 appears to be included in the Certification Application due by May 1st, are carriers required to provide this data in February and then again in May?</p>	<p>This Certification Application question will be required for new entrants only beginning in 2023.</p>