

Cover Page

Qualified Dental Plan (QDP) Model Attachment 7 and Attachment 14 Contract Second Round Comments

The following is the Covered California response to "Second 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
Attachment 7	1.03	As stated in our comments to Covered California for the 2023 Model Contract, we are concerned regarding the application not requiring consumers to provide data elements of 1.03 that are permitted by law. Capturing this information at time of application makes the most sense and prevents administrative burden.	Covered California's position remains consistent with prior responses. We agree the enrollment application is an important opportunity to collect this information but does not intend to pursue mandatory race and ethnicity questions in the enrollment application. Covered CA is analyzing voluntary response rates to the race and ethnicity questions by service channel and considering ways to provide training and support to enrollers in order to improve these response rates. Covered CA will continue to explore opportunities to improve capture of member self-identified race and ethnicity data. No contract change will be made.
Attachment 7	1.03 3)	Please confirm the comment regarding off-exchange members is limited to CA Individual off-exchange.	Covered California confirms that section 1.03 refers to California Individual off-exchange
Attachment 7	1.03 3)	There is limited ability to capture race and ethnicity data for off-exchange consumers. At this time we cannot capture race and ethnicity during the application process. We request Covered California's assistance in advocating for change that would permit carriers to request this information at time of application. That is the most appropriate time to capture such information.	Covered California is committed to supporting efforts to improve collection of demographic data in off-Exchange populations.
Attachment 14	General Comment	Since this is a contract extension, we respectfully request that credits continue to apply until a new contract term applies.	No contract change will be made.
Attachment 14	General Comment	Since Covered California is removing service metrics from the QHP Attachment 14 penalties we respectfully request Covered California give consideration to removing such penalties for QDP as well.	This will be considered for 2024 QDP refresh. No contract change will be made.
Attachment 14	2.5 a)	We request clarity how Covered California uses the Provider Data Submissions that are loaded to the Extranet as we do not recall receiving reports or feedback for the data submissions. Please provide an update if/when we can expect to transition to using LexisNexis for the data submissions.	The data is collected to facilitate response to ad hoc questions about QDP networks from management, as well as inquiries from legislators, consumer advocates and the general public as they arise. It also allows us to track network changes over time. The inclusion of stand-alone dental providers into the provider directory is on the development roadmap, however we don't currently have a timeline for inclusion into the provider directory
Attachment 14	2.5 b)	We request Covered California remove reference to "encounters" as a source for QDP penalties. There is an industry concern regarding QDP encounters that will not be resolved by contract term 2023.	We are working through data submissions that include encounters. No contract change will be made.
Attachment 14	2.5 b)	We request "NPI" be removed as NPI is not a requirement for Dental providers.	NPI is used to identify various types of dental providers (e.g., ordering, rendering / servicing) in the record layouts. No contract change will be made.
Attachment 14	Group 5	Group 5, 5.1, 5.2, 5.3, 5.4, 5.5, 5.6, 5.7, 5.8, and 5.9 do not appear to be related to Performance Standards involving performance penalties or credits. We request this information be moved to Attachment 7 where it appears to be more appropriate.	This may be considered for 2024 QDP refresh. No contract change will be made.