

## **Cover Page**

### **Covered California Small Business (CCSB) Qualified Health Plan (QHP) Attachment 2 – Performance Standards with Penalties Response to Comments**

The following is the Covered California response to comments received on February 11, 2022, for the 2023-2025 CCSB Att 2-Performance Standards with Penalties.

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

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

**Response to Comments Received on February 11, 2022**  
**2023-2025 CCSB Attachment 2 - Performance Standards with Penalties**

Performance Standard #	Comment Date	Comment	Covered California Response
Performance Guarantee 2 DQA	2/11/22	Most employers offer separate family dental plans for employees / dependents. We believe that QHP utilization of the embedded pediatric dental benefit is too small for credible reporting, or the basis for a performance standard w/penalty. As such, we strongly oppose having a Performance Standard w/Penalty attached to CCSB DQA results, and recommend this be removed.	One of the purposes of the pilot period is to assess current utilization and better understand where children are receiving their dental care. Before proposing performance levels on select DQA measures for 2024-2025, we will conduct a full engagement process and review of the data.
Attachment 2	2/11/22	The Individual contract Performance Standard for HEI data will cover any gaps in the Small Business data, so it is unnecessary to also have a penalty on the same item in both contracts.	Covered CA will waive the penalty related to CCSB HEI Data performance requirements and will revisit this requirement if data quality appears to be an issue in the future.
Attachment 2	2/11/22	<p>Overall, we are strongly opposed to putting any performance standard penalties on the CCSB QHPs. These products need to be competitive with the off-exchange Small Business market. Adding to premiums to account for Performance Standard penalties will further erode the competitive position between CCSB and the overall Small Business market.</p> <p>Additionally, there are known issues with CCSB enrollment processing. Performance Standard penalties should be designed to achieve &amp; incent for certain outcomes - and neither the DQA or HEI aligns to what is important to the small group market decision makers (brokers or employers).</p>	<p>Covered CA will continue with DQA measures for a pilot period, and before proposing performance levels on select DQA measures for 2024-2025, we will conduct a full engagement process and review of the data.</p> <p>Covered CA will waive the penalty related to CCSB HEI Data performance requirements and will revisit this requirement if data quality appears to be an issue in the future.</p>