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QHP Model Contract for Covered California for Small Business Third Round Comments

The following is the Covered California for Small Business (CCSB) response to “Third Round” comments received for the 2023-2025 QHP CCSB Model Contract.

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

Article-Section No.	Article-Section Title	Comment Date	Comment	Response
3.1	Transitions of Coverage	2/10/22	Our comment is specific to the last sentence in this section, "Covered California expects Contractor to fully assist enrollee transition to other eligible coverage either in Medi-Cal, Medicare, or Covered California, as applicable". It is not possible to know what actions health plans would be expected to take to "fully assist enrollee transition to other eligible coverage". It would be helpful to understand Covered CA's expectations. This language could cover a wide range of activities.	Language has been added; please see updated contract.
3.2.1	Marketing Coordination	2/11/22	Marketing for Small Business is materially different than Individual - predominately broker driven to the employer and minimal direct response. We recommend that the expectation of co-branded direct response marketing for CCSB be removed.	Sentence has been removed: "Contractor is expected to engage in robust marketing including direct response and co-branded marketing with Covered California, to drive enrollment and promote the value of health insurance coverage."
3.3	Agent Compensation	2/11/22	CCSB establishes the commission schedule for CCSB products, not the QHPs, the requirement for Contractor to adequately compensate enrollees in the CCSB plans is not applicable and should be removed to provide clarity.	Sentence has been removed: "To this end, Covered California requires Contractor to adequately compensate Certified Agents for enrollments in its QHPs."
5.2.1.e	Quality Requirements	2/11/22	<p>Given the significant differences between the Individual Market and CCSB, in that the vast majority of Small Business is purchased outside of CCSB and many plans not participating with CCSB, we are concerned about requirements that can increase the administrative cost of participating in this marketplace.</p> <p>We are already working on quality improvement efforts for our commercial lines of business, inclusive of CCSB. We recommend that the contract instead reflect that CCSB encourages QHPs to extend the similar QI initiatives to the CCSB populations, but does not contractually require them to do so.</p> <p>It's important to note that plans already do significant work on managing care and improving quality for the small business marketplace. Our concern is that these requirements may not align with existing efforts already underway, and will add a significant reporting and administrative burden - putting the CCSB portfolio out of alignment with the overall Small Group market.</p>	<p>Covered California has focused on keeping the CCSB Attachment 1 requirements consistent across years. The 2023-2025 CCSB Attachment 1 is largely similar to the 2022 CCSB Attachment 7 in terms of what requirements are waived or not for CCSB plans. The CCSB Attachment 1 contains requirements that require minimal added burden to implement for both the IND and CCSB markets or the requirement is a priority area, like NCQA accreditation and behavioral health. Many requirements are waived. Covered California would welcome suggestions from Blue Shield on specific requirements that should be waived in the 2023-25 CCSB Attachment 1.</p> <p>The 2023-2025 CCSB Attachment 2 only has two standards – HEI data submissions and DQA pediatric measure set. Both of these standards are proposed for pilot periods in 2023 with no penalties assessed. We believe the HEI and DQA data are important ways for Covered California to track CCSB quality.</p>

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Overall	Reconciliation	2/11/22	The CCSB contract should have additional language discussing the responsibilities and performance standards for QHPs and CCSB around enrollment and financial reconciliation processes. Recommend that the QHPS and CCSB leadership work together to define these standards.	This topic will not be ready for the 2023 CCSB Model Contract, but will be considered for future amendments.