



June 30, 2025

Office of Administrative Law  
Attn: Kevin D. Hull  
300 Capitol Mall, Suite 1250  
Sacramento, CA 95814

Re. Request for Information Regarding Publication of the Official California Code of Regulations and the California Regulatory Notice Register

Dear Mr. Hull,

Covered California appreciates the opportunity to provide input on the Office of Administrative Law's (OAL) Request for Information (RFI) regarding the publication of the Official California Code of Regulations (CCR) and the California Regulatory Notice Register (Notice Register). As the state's health insurance marketplace, Covered California plays a critical role in ensuring that Californians can access affordable, high-quality health coverage, while working closely with state and federal agencies to administer policies and regulations that promote health equity and care delivery reform. Given that federal regulations dictate much of our work, Covered California regularly updates its regulations in the CCR to align with changes to federal regulations found in the Code of Federal Regulations (CFR). We also actively monitor regulatory changes across various agencies to assess their potential impact on our programs and operations, ensuring we remain responsive and compliant. This dynamic regulatory environment underscores the need for tools that facilitate efficient updates, streamline navigation, and enhance usability for agencies, stakeholders, and the public alike. Leveraging our distinct perspective and extensive expertise, Covered California offers these recommendations for improving the CCR platform.

## Enhanced Navigation Tools

One of the most significant challenges we encounter when working with the CCR is the limited functionality of its navigation tools. While the breadcrumb trail<sup>1</sup> feature provides some guidance, it is restricted to the article level, which makes it cumbersome to navigate between individual sections within an article or title. This limitation can be particularly problematic when attempting to align multiple provisions across sections

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<sup>1</sup> A breadcrumb trail is a navigation aid that displays a hierarchical path, showing users where they are within a platform and providing links to previous levels.

during regulatory updates. Expanding the breadcrumb trail functionality to the section level and incorporating features such as side-by-side navigation panes and an expandable table of contents would vastly improve the platform's usability. These tools would help agencies like Covered California quickly access related provisions, maintain regulatory context, and ensure consistency across updates.

### **Improved Historical Comparisons**

Another area for improvement is the ability to compare historical versions of regulatory text. While approval history is available, it does not allow for side-by-side comparisons of prior text versions, nor does it integrate finalized text files directly into the CCR platform. Instead, users must visit individual agency websites to retrieve approved text, which adds unnecessary complexity to the process. Enhancing the approval history functionality to include comparative views and integrating finalized text files directly into the CCR would provide critical insights into how regulations have evolved over time. This would be particularly beneficial for agencies tasked with ensuring compatibility between new amendments and prior regulatory changes.

### **Improved Cross References**

Cross-referencing between sections is another feature that could benefit from modernization. The current CCR lacks hyperlinks between interconnected provisions, requiring users to manually locate cross-referenced sections. This is not only time-consuming but also increases the risk of errors in locating related rules. Additionally, the CCR is not integrated with the Notice Register, making it difficult to efficiently connect pending or proposed amendments to specific sections. Incorporating hyperlinked cross-references within the CCR and providing direct links to relevant entries in the Notice Register would streamline the research and drafting process, ensuring that agencies can track changes and align their regulations with broader updates effectively.

### **Expanded Download and Printing Options**

Covered California also sees an opportunity to improve the CCR's download and printing capabilities. While users can print browser screens, the platform does not currently allow for downloading or printing customized sections, titles, or portions of the code in formats like PDF or XML. Adding these capabilities would enable agencies to work offline, share regulatory materials more easily during drafting processes, and provide tailored documentation for stakeholders.

### **Subscription-Based Alerts**

Lastly, the CCR could benefit from a subscription-based alert system to notify users of updates to specific sections. As federal regulations in the CFR change frequently,

Covered California must stay proactive in responding to these updates and aligning our state regulations accordingly. A subscription alert system would allow users to track amendments to sections they rely on without having to manually monitor them, ensuring timely updates and reducing the risk of oversight.

Thank you for considering our comments. If you have any questions or need additional information, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Jessica H. Altman". The signature is written in a cursive, flowing style.

Jessica Altman  
Executive Director