

## **Cover Page**

### **Covered California for Small Business Qualified Health Plan Issuer Contract Attachment 1: Advancing Equity, Quality, and Value**

#### **Response to Comments**

The following is the Covered California response to comments received for the 2023-2025 Covered California for Small Business Qualified Health Plan Contract, Attachment 1

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

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

Article	Section #	Comment	Covered California Response
		<p>As CCSB still represents only a very small portion of the small group market, we strongly recommend that no sections of attachment 1 be applied until such time that CCSB reaches material market share.</p>	<p>Covered California agrees that CCSB is currently a small portion of the small group market, however the only Performance Standards that apply towards CCSB at this time are the Oral Health Standards. Covered California has reviewed this request and will continue with the current approach to apply Oral Health Standards to CCSB.</p>
1	1.05	<p>Oppose adding evidence of culturally &amp; linguistically appropriate services.</p> <p>There are already requirements around cultural/linguistic requirements for health plans, and there isn't a compelling rationale on how this added administrative burden on CCSB products will driver higher quality outcomes.</p> <p>We remain concerned about the additional administrative costs CCSB is placing on the overall small business products, which will result in higher premiums for the CCSB products and overall loss of market share compared to rest of the Small Business Market. (adding to competitive pressure that CCSB already faces with other distribution channels in CA).</p> <p>Unlike the IFP market, the vast majority of Small Business market is outside of CCSB. With only a small number of QHPs participating on CCSB, changes such as these further disadvantage the QHP/CCSB products from the rest of the market.</p>	<p>Covered California agrees that CCSB is currently a small portion of the small group market and we appreciate feedback to understand concerns and potential cost implications of proposed contractual requirements for QHPs participating in CCSB. The reporting requirements for evidence of culturally and linguistically appropriate services add no additional burden to CCSB, as the same report that is submitted to Covered California for the Individual marketplace for this requirement can be provided for CCSB.</p>

Article	Section #	Comment	Covered California Response
2	2.02	<p>Oppose adding PLD file for reporting screening for depression.</p> <p>We remain concerned about the additional administrative costs CCSB is placing on the overall small business products, which will result in higher premiums for the CCSB products and overall loss of market share compared to rest of the Small Business Market. (adding to competitive pressure that CCSB already faces with other distribution channels in CA).</p> <p>Unlike the IFP market, the vast majority of Small Business market is outside of CCSB. With only a small number of QHPs participating on CCSB, changes such as these further disadvantage the QHP/CCSB products from the rest of the market.</p>	<p>Covered California agrees that CCSB is currently a small portion of the small group market and we appreciate feedback to understand concerns and potential cost implications of proposed contractual requirements for QHPs participating in CCSB. The PLD file submission for reporting screening for depression matches the HEDIS and CMS sample and includes both Individual members and CCSB members, thus we are not requesting a separate CCSB PLD file. Covered California encourages QHPs to follow the PLD submission instructions.</p>
2	2.03	<p>Oppose adding PLD file for reporting HEDIS hybrid measure Pharmacotherapy for Opioid Use Disorder results stratified by race and ethnicity.</p> <p>We remain concerned about the additional administrative costs CCSB is placing on the overall small business products, which will result in higher premiums for the CCSB products and overall loss of market share compared to rest of the Small Business Market. (adding to competitive pressure that CCSB already faces with other distribution channels in CA).</p> <p>Unlike the IFP market, the vast majority of Small Business market is outside of CCSB. With only a small number of QHPs participating on CCSB, changes such as these further disadvantage the QHP/CCSB products from the rest of the market.</p>	<p>Covered California agrees that CCSB is currently a small portion of the small group market and we appreciate feedback to understand concerns and potential cost implications of proposed contractual requirements for QHPs participating in CCSB. The PLD file submission for reporting HEDIS hybrid measure Pharmacotherapy for Opioid Use Disorder results stratified by race and ethnicity matches the HEDIS and CMS sample and includes both Individual members and CCSB members, thus we are not requesting a separate CCSB PLD file. Covered California encourages QHPs to follow the PLD submission instructions.</p>
2	2.05	<p>Oppose requiring subcontractor/vendor agreements to include all duties and obligations under this Agreement relating to the delegated duties in the Subcontractor agreement;</p> <p>This requirement would potentially require a recontracting of every single provider contract and vendor agreement, which would place an incredible administrative cost on an QHP.</p>	<p>Covered California will revise and more clearly specify the expectations for Subcontractor agreements. We will clarify in section 2.05.1 that QHP issuers are responsible for oversight and accountability of all behavioral health network providers, Subcontractors, or Downstream Entities to meet the requirements outlined in Article 2 of Attachment 1. Our intent is for behavioral health subcontractors to support QHP issuers in meeting Covered California's health equity, quality, and delivery system reform requirements.</p>

Article	Section #	Comment	Covered California Response
2	2.05	<p>Oppose Delegation Reporting - this puts a significant administrative cost on the QHPs (with large volume of vendors / contracts) without a clearly understand value for Covered CA to review this data.</p> <p>Recommend Covered CA and CCSB QHPs discuss to understand the intention of this ask, and what specific concerns Covered CA is seeking to mitigate</p>	<p>While we understand the concern for administrative burden, Covered California is committed to ensuring behavioral health service quality and further understanding the delegation and oversight processes of all behavioral health Subcontractors and Downstream Entities. The delegation report requirement only pertains to the delegation of behavioral health services. This requirement is aligned with DHCS and CalPERS contract requirements. Covered California will revise and more clearly specify the delegation report requirements.</p> <p>For CCSB, if QHPs use the same vendors for the Individual market and CCSB market, then the same report and materials can be submitted for this requirement.</p>
3	3.01	<p>Oppose adding Population Health requirements to CCSB</p> <p>We remain concerned about the additional administrative costs CCSB is placing on the overall small business products, which will result in higher premiums for the CCSB products and overall loss of market share compared to rest of the Small Business Market. (adding to competitive pressure that CCSB already faces with other distribution channels in CA).</p>	<p>Covered California appreciates feedback to understand concerns and potential cost implications of proposed contractual requirements for QHPs participating in CCSB. The reporting requirements for Population Health Management plan add no additional burden to CCSB, as the same report that is submitted to Covered California for the Individual marketplace for this requirement can be provided for CCSB.</p>
3	3.03	<p>Oppose the additional requirements to support enrollees transitioning between QHPs.</p> <p>CCSB hasn't articulated how this will actually be administered - as QHPs don't have data on where CCSB members transition to. Suggest this be removed and instead CCSB QHPs work on this collectively to define specific problems/gaps and solutions</p>	<p>Covered California will not remove this requirement from the CCSB Market at this time. Covered California will collaborate with QHPs, as needed, to implement any transitions between QHPs.</p>