

Cover Page

Covered California for Small Business (CCSB) Qualified Health Plan Issuer Second Round Comments

The following is the Covered California response to “Second Round” comments received for the 2023-2025 QHP CCSB Model Contract Amendment for 2024.

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

Article	Section #	Other Document Cross-Ref	Comment	Covered California Response
1	1.3.b ii		<p>Current language: Contractor’s delegation agreements shall comply with the specifications included in 45 C.F.R. § 156.340 and <u>must include language stating</u> that Covered California</p> <p><u>Modification requested</u> to red underlined section above to "<u>must include language supporting</u>". Currently our delegation agreements have language that supports Covered California being able to demand and receive the listed information, it would be a large undertaking to update all agreements to include the specific language noted here.</p>	<p>This section requires compliance with 45 C.F.R. § 156.340(b)(5). If delegation agreements already comply with federal requirements, this section would not require agreements to be updated.</p> <p>No change will be made.</p>
3	3.2.1.2 b)		<p>Oppose "any translated marketing materials shall be produced at the same time as English materials."</p> <p><u>Recommendation:</u> remove this sentence as it is vague and would be costly to administer without additional context. It is unclear what issue/concern is being solved by having this language. Carriers already provide marketing materials in additional language as required and appropriate for their market/service area.</p>	<p>Covered California added this section to address delays in distributing translated materials that disadvantage limited English proficient individuals. To the extent that QHP issuers provide translated marketing materials, these materials should be accessible to Enrollees at the same time as English language materials. Based on comments received regarding the language of this section, Covered California will revise the language to clarify the requirement.</p>