

**COMMENT TEMPLATE - Draft 2023 - 2025 Attachment for Quality, Equity, And Delivery System Transformation Requirements and Improvement Strategy**

Last Update: 3/30/2022

Article-Section No.	Article-Section Title	Comment Date	Comment	Covered California Response
1.02.1		1-28-22	<p>We would like to provide input on the measures that were added to 1.02.1.</p> <ul style="list-style-type: none"> <li>• The patient level data files are referred to as "hybrid, however DSF, POD, PND-E and PSS-E are all admin only measures.</li> <li>• The NCQA version of DSF does not include billable codes like the CMS version. The only way to acquire this data would be through EMR, which would require IT funding and development. Additionally, data for individuals that are not tied to a large EMR system would not be obtained.</li> </ul>	<p>We will remove "hybrid" from Attachment 1 to accurately reflect that we require patient level data files for multiple types of measures.</p> <p>We recognize that there are challenges with implementing the DSF measure. Covered California will move forward with requiring the DSF measure as a reporting measure in the QTI measure set and the health disparities reduction measure set in alignment with DHCS and CalPERS. We also support the move towards ECDS measures such as DSF and CMS is considering moving towards QRS ECDS measures as well.</p>
Attachment 1	Preamble	2/11/22	<p>In the paragraph discussing submitting "...information, including reports, plans, and data... annually at a time... determined by Covered California unless otherwise specified..." please consider adding something along the lines of adequate advance notice so Contractor has appropriate time to gather the required reporting information.</p>	<p>Covered California will continue to work collaboratively with QHP issuers to provide adequate notice for requested reports, plans, and data. We will not be revising the preamble language at this time.</p>