

Response to Comment Cycle 1 - Draft 2027 Amendment - QDP Issuer Model Contract

Article	Section #	Comment	Covered CA Response
3	3.2.1.2 (j)	In Section 3.2.1.2 (j) we propose making the acceptance of credit cards optional for QHPs and QDPs. The significant administrative costs associated with credit card interchange and assessment fees (approximately 2-3% industry-wide) unnecessarily inflate premiums when consumers choose to use credit cards for points or rewards instead of other available payment methods, including debit cards or ACH payments. While the current language allows QHPs to charge reasonable fees for credit card processing, this may not be practical without further regulatory guidance.	While Covered California understands the cost concerns, credit cards are an important payment option for consumers, providing flexibility and enhancing access to coverage. No changes will be made to this section; we believe keeping credit card payment as an option is necessary to ensuring accessibility and convenience for consumers.