

Article	Section #	Comment	Covered CA response
4	4.02.3	Can Health Plans run their own performance measurement programs and send data directly to Covered CA without going through an intermediary like IHA? IHA's high program fees and penalties along with internal cost to build and deliver files to IHA places high financial burden on Health Plans. Additionally, the multiple deliverables with short turnaround times contribute to a significant amount of work for staff. Allowing health plans the flexibility to deliver these files without intermediary will provide for flexibility to contain rising costs and reduce extra workload.	Covered California is not proposing any changes to the QHP 2026-2028 Model contract Attachment 1 with the exception of the removal of the NCQA Health Equity Accreditation requirement effective for Plan Year 2027. All reporting and other requirements will remain as outlined in the current contract agreement. The QHP 2026-2028 Model contract reflects an extensive stakeholder engagement process including multiple contract working groups, public meetings, and multiple rounds of public comment. The next opportunity for feedback will be during the 2029-2031 QHP contract development process. We will review and consider all comments received through that process. Questions or concerns with implementation of the QHP 2026-2028 Model Contract Attachments 1, 2 or 4 can be submitted to <a href="mailto:EQT@covered.ca.gov">EQT@covered.ca.gov</a> at any time.
5	5.02.4	Can Health Plans run their own performance measurement programs and send data directly to Covered CA without going through an intermediary like IHA? IHA's high program fees and penalties along with internal cost to build and deliver files to IHA places high financial burden on Health Plans. Additionally, the multiple deliverables with short turnaround times contribute to a significant amount of work for staff. Allowing health plans the flexibility to deliver these files without intermediary will provide for flexibility to contain rising costs and reduce extra workload.	Covered California is not proposing any changes to the QHP 2026-2028 Model contract Attachment 1 with the exception of the removal of the NCQA Health Equity Accreditation requirement effective for Plan Year 2027. All reporting and other requirements will remain as outlined in the current contract agreement. The QHP 2026-2028 Model contract reflects an extensive stakeholder engagement process including multiple contract working groups, public meetings, and multiple rounds of public comment. The next opportunity for feedback will be during the 2029-2031 QHP contract development process. We will review and consider all comments received through that process. Questions or concerns with implementation of the QHP 2026-2028 Model Contract Attachments 1, 2 or 4 can be submitted to <a href="mailto:EQT@covered.ca.gov">EQT@covered.ca.gov</a> at any time.
2	2.03.3	The fastest way Contractors can begin educating enrollees to impact tobacco use is if Covered California shares this information on the 834. We request Covered California to capture tobacco use status as part of the enrollment application to share with carriers.	Covered California is not proposing any changes to the QHP 2026-2028 Model contract Attachment 1 with the exception of the removal of the NCQA Health Equity Accreditation requirement effective for Plan Year 2027. All reporting and other requirements will remain as outlined in the current contract agreement. The QHP 2026-2028 Model contract reflects an extensive stakeholder engagement process including multiple contract working groups, public meetings, and multiple rounds of public comment. The next opportunity for feedback will be during the 2029-2031 QHP contract development process. We will review and consider all comments received through that process. Questions or concerns with implementation of the QHP 2026-2028 Model Contract Attachments 1, 2 or 4 can be submitted to <a href="mailto:EQT@covered.ca.gov">EQT@covered.ca.gov</a> at any time.
4	4.01.1 1)	To assist Contractors with the assignment process, we respectfully request Covered California send cultural preference information on the 834. We understand Covered California does not currently collect cultural preference information as part of enrollment. We request Covered California to capture cultural preference information as part of the application and if this is not possible, we request the removal of this expectation.	Covered California is not proposing any changes to the QHP 2026-2028 Model contract Attachment 1 with the exception of the removal of the NCQA Health Equity Accreditation requirement effective for Plan Year 2027. All reporting and other requirements will remain as outlined in the current contract agreement. The QHP 2026-2028 Model contract reflects an extensive stakeholder engagement process including multiple contract working groups, public meetings, and multiple rounds of public comment. The next opportunity for feedback will be during the 2029-2031 QHP contract development process. We will review and consider all comments received through that process. Questions or concerns with implementation of the QHP 2026-2028 Model Contract Attachments 1, 2 or 4 can be submitted to <a href="mailto:EQT@covered.ca.gov">EQT@covered.ca.gov</a> at any time.
4	4.01.2 2)	We respectfully request that different primary care providers in the same office count towards the two or more visits.	Covered California is not proposing any changes to the QHP 2026-2028 Model contract Attachment 1 with the exception of the removal of the NCQA Health Equity Accreditation requirement effective for Plan Year 2027. All reporting and other requirements will remain as outlined in the current contract agreement. The QHP 2026-2028 Model contract reflects an extensive stakeholder engagement process including multiple contract working groups, public meetings, and multiple rounds of public comment. The next opportunity for feedback will be during the 2029-2031 QHP contract development process. We will review and consider all comments received through that process. Questions or concerns with implementation of the QHP 2026-2028 Model Contract Attachments 1, 2 or 4 can be submitted to <a href="mailto:EQT@covered.ca.gov">EQT@covered.ca.gov</a> at any time.

Responses to Comment Cycle 2 - Draft 2027 Amendment - QHP Issuer Contract for Individual Market - Attachment 1

4	4.02	We request reference to expecting Contractor to address "low value care" be removed. Most Contractors do not practice medicine and there are complexities for providers that may require services which may be considered "low value care." In light of previous responses, we respectfully request specifics on what is considered "low-value care".	Covered California is not proposing any changes to the QHP 2026-2028 Model contract Attachment 1 with the exception of the removal of the NCQA Health Equity Accreditation requirement effective for Plan Year 2027. All reporting and other requirements will remain as outlined in the current contract agreement. The QHP 2026-2028 Model contract reflects an extensive stakeholder engagement process including multiple contract working groups, public meetings, and multiple rounds of public comment. The next opportunity for feedback will be during the 2029-2031 QHP contract development process. We will review and consider all comments received through that process. Questions or concerns with implementation of the QHP 2026-2028 Model Contract Attachments 1, 2 or 4 can be submitted to EQT@covered.ca.gov at any time.
4	4.02.4 5)	Since the Covered California contract pertains to Covered California enrollees, we request the following change: 5) Contractor shall work with Covered California to provide comparison reporting for the requirements in Article 4.02.4 <del>for all lines of business</del> to compare performance and inform future Covered California requirements in this area.	Covered California is not proposing any changes to the QHP 2026-2028 Model contract Attachment 1 with the exception of the removal of the NCQA Health Equity Accreditation requirement effective for Plan Year 2027. All reporting and other requirements will remain as outlined in the current contract agreement. The QHP 2026-2028 Model contract reflects an extensive stakeholder engagement process including multiple contract working groups, public meetings, and multiple rounds of public comment. The next opportunity for feedback will be during the 2029-2031 QHP contract development process. We will review and consider all comments received through that process. Questions or concerns with implementation of the QHP 2026-2028 Model Contract Attachments 1, 2 or 4 can be submitted to EQT@covered.ca.gov at any time.
4	4.02.6	The fastest way Contractors can begin addressing health during pregnancy is if Covered California shares this information on the 834. We request Covered California to capture pregnancy status as part of the enrollment application.	Covered California is not proposing any changes to the QHP 2026-2028 Model contract Attachment 1 with the exception of the removal of the NCQA Health Equity Accreditation requirement effective for Plan Year 2027. All reporting and other requirements will remain as outlined in the current contract agreement. The QHP 2026-2028 Model contract reflects an extensive stakeholder engagement process including multiple contract working groups, public meetings, and multiple rounds of public comment. The next opportunity for feedback will be during the 2029-2031 QHP contract development process. We will review and consider all comments received through that process. Questions or concerns with implementation of the QHP 2026-2028 Model Contract Attachments 1, 2 or 4 can be submitted to EQT@covered.ca.gov at any time.
5	5.02.1.1)c)	Last year, we requested clarification whether Covered California analyzing data for purposes of Fraud, Waste, and Abuse and partnering with Contractors, at a minimum, to address and prevent Fraud is authorized by law. We hope it is and look forward to expanding the partnership with Covered California and other QHP Issuers to address and prevent Fraud. We received the response that Covered California does not analyze data specifically for purposes of F/W/A. We respectfully request that Covered California analyze all the data they receive to prevent and address Fraud.	Covered California is not proposing any changes to the QHP 2026-2028 Model contract Attachment 1 with the exception of the removal of the NCQA Health Equity Accreditation requirement effective for Plan Year 2027. All reporting and other requirements will remain as outlined in the current contract agreement. The QHP 2026-2028 Model contract reflects an extensive stakeholder engagement process including multiple contract working groups, public meetings, and multiple rounds of public comment. The next opportunity for feedback will be during the 2029-2031 QHP contract development process. We will review and consider all comments received through that process. Questions or concerns with implementation of the QHP 2026-2028 Model Contract Attachments 1, 2 or 4 can be submitted to EQT@covered.ca.gov at any time.