

From: [Mike's Anderson](#)
To: [E-OHPSCA2719amend.EBSA](#)
Date: Wednesday, July 20, 2011 10:47:24 AM

On behalf of My self and the NCIHC, I wish to comment on the 10% threshold for translation and oral interpretation of private plan materials in the internal review and appeals contexts. I am... [add 1-2 sentences about yourself, organization or work with LEP individuals]. The 10% standard is far too high. A more appropriate standard would be "5% of the plan's population or 500 persons in plan's service area, whichever is less" for large group plans, and 25% of population for small plans. Oral interpretation should be provided in all languages at all times. {Consider adding information about the impact on your clients when they cannot get documents in a language that they understand.}

Regards Mike

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