

# PUBLIC SUBMISSION

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Interim Final Rules for Group Health Plans and Health Insurance Issuers Relating to Internal Claims and Appeals and External Review Processes Under the Patient Protection and Affordable Care Act

**Comment On:** EBSA-2010-0019-0002

Group Health Plans and Health Insurance Issuers: Internal Claims and Appeals and External Review Processes

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## Submitter Information

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### General Comment

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 a 1.5 generation Korean American living in a suburb of Atlanta, Georgia. I have the benefit of having grown up in the US and speak English fluently. For those who aren't fortunate enough to speak English at a functional language, life in the US can be very challenging. Without the benefit of having linguistically appropriate services available to them, many would get lost in the system. 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" for large group plans, and 25% of population for small plans. Oral interpretation should be provided in all languages at all times. I urge you to reconsider. Thank you.