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

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General Comment

On behalf of my mother and in-laws, I wish to comment on the 10% threshold for translation and oral interpretation of private plan materials in the internal review and appeals contexts. My mother and in-laws are from China and their mother tongue is Chinese. 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. This is so important - if they don't understand their health care insurance, they have trouble accessing health care and could get more sick. thank you for respecting this!