

# PUBLIC SUBMISSION

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**Docket:** EBSA-2010-0019

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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## General Comment

Foreign Language Specialists, Inc. is a Certified Women's Business Enterprise that has been providing translation and interpreting services for all of the State of Washington agencies incl. DSHS, BIIA, DOC, L&I & DDDS; King County, City of Seattle, and many private clients as well since 1992.

We contract with more than 500 State and Federal certified interpreters in more than 100 languages and dialects. FLS Interpreters are checked for the criminal background and sign a Confidentiality Agreement. Medical interpreters are HIPAA trained. The Company holds professional Errors & Omissions insurance for 2,000,000.00 USD. Written Translation of all sorts, sizes and in any format are provided globally in most world known languages. Our rates are very cost effective.

As a founder and the President of Foreign Language Specialists, Inc., I wish to comment on the 10% threshold for translation and oral interpretation of private plan materials in the internal review and appeals contexts. 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. Equal rights to ALL!!! The malpractice law-suits due to the lack of communications might cost billions of dollars. Reaching out to many more potential customers and clients in their own language will guarantee every insurance company a growth, great reputation and success; and to be ahead of the competitors, discriminating the huge amount of population by declining them their civil rights – medical care in the language they understand.

Sincerely,  
Olga Afonin  
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