On behalf of the Center for Pan Asian Community Services, 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 social worker that works with the Chinese immigrant population, and almost all of the clients I see are limited English proficient. The Center for Pan Asian Community Services, Inc. (CPACS) is a private non-profit organization. Its mission is to create and deliver culturally competent and comprehensive social and health services to counteract problems faced by immigrants, refugees, and racial-ethnic minorities.

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.