PUBLIC SUBMISSION

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

Document: EBSA-2010-0019-DRAFT-0087
Comment on FR Doc # 2011-15890

Submitter Information

Name: June Krumpotick
Address: 907 Pine St., Suite 500
         Seattle, WA, 98101
Email: jkrumpotick@LegalVoice.org
Phone: (206) 682-9552, ext. 105
Organization: Legal Voice

General Comment

I am commenting on behalf of Legal Voice on the 10% threshold for translation and oral interpretation of private plan materials in the internal review and appeals processes. Legal Voice works to advance women's legal rights in the northwestern U.S. through impact litigation and legislative advocacy and provides legal information and referral to people in Washington State. We strive, via internal policies, collaborative efforts, and volunteer workgroups to acknowledge and address the importance of language access in understanding and enforcing individual rights. Healthcare is a core issue area for us. We believe that the 10% standard for translation and interpretation is far too high. We urge you to adopt a standard of 5% of the plan's population or 500 people in the 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.