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

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Submitter Information

General Comment

On behalf of 12 million limited English proficient (LEP) individuals in the United States, Eddie Tam from a major language service agency in Chicago 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 LEP advocate, an interpreter, a trainer and an individual who belongs to a minority group. I have experienced difficulties to communicate with others when my English was very limited. The 10% standard is far too high. This threshold would mean approximately 12 million LEP individuals holding documents in a language that they can't respond to. This should consider a violation of their civil rights. A more tolerable standard would be 5% of the plan's population. Oral interpretation should be provided in all languages at all times.