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Uniform Disclosure to Consumers: Benefit Design, Cost Sharing, & Standards for Definitions

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Summary of Benefits and Coverage and Uniform Glossary: Templates, Instructions, and Related Materials under Public Health Service Act

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Submitter Information

Name: Julia Olf, MBA, CHES

Address:

Clark, NJ, 07066

Organization: HealthEd

General Comment

As a patient education agency focused on health literacy, we applaud the proposed regulation. We recognize a consumer's ability to manage their health and wellness is dependent upon having a working understanding of their available health benefits, and services and knowing the implications for costs and cost sharing.

We strongly recommend the SBC be prominently displayed at the beginning of the SPD. In addition, we recommend health plans widely promote the introduction of these plain language benefits materials to consumers in as many venues as possible – such as on their web sites, and during employer open season – as simple, valuable tools that will help them take an active role in their health. We believe efforts to promote these materials will increase awareness and broaden access, ultimately leading to more informed selection of health plans and use of health plan services. Providing these materials including the uniform glossary, only upon request will create considerable obstacles to access and limit exposure to only a minority of empowered consumers or those who intrinsically recognize their value. This would undermine the benefit of this important health literacy initiative.

We believe the glossary of health insurance and medical terms will provide support to consumers of all health literacy levels. The inclusion of a graphic as well as the example of shared costs can help consumers understand numeric examples. The presentation of the scale graphic may not be intuitive to consumers with less than proficient health literacy. The graphic may require additional evaluation to correlate the angle of the scale to the percent of costs shared. We suggest exploring use of different types of graphics such as a pie chart that can be immediately understood. Alternatively you might consider rearranging the captions and labels so they more closely align with the consumer and health plan icons and improve the educational value of the graphic.