

# PUBLIC SUBMISSION

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**Docket:** CMS-2011-0140

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

**Comment On:** CMS-2011-0140-0002

Summary of Benefits and Coverage and Uniform Glossary

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## Submitter Information

**Name:** Mary Abrams

**Address:**

Des Moines, IA, 50309

**Organization:** Iowa Health System

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## General Comment

I have several concerns about the Sample Completed Summary of Coverage. My main concern is the language -- it is far too technical, including a tremendous amount of "standard" insurance jargon and technical terms. The formatting as a table is confusing since it is a list of questions and answers. The light blue highlighting is also confusing as it appears random and inconsistent and is not clear to me why it is used. There is varying use of black bold and blue bold that seem to be random, and for those with visual limitations could be very hard to read, especially if printed in black and white. In places this document is very text-dense; in other places it has too much information crunched together in tabular form.

Overall, it does not appear to promote people's ability to read, understand, and use the information to make prudent, appropriate choices about their health benefits. For such a critical component of health reform, that is a fundamental requirement.

Adult learners (those who struggle with reading and working to improve their reading skills as adults) should be involved in developing these documents, as well as other end-users, and plain language and health literacy experts.

Thank you.