

# PUBLIC SUBMISSION

<b>As of:</b> October 24, 2011
<b>Received:</b> October 21, 2011
<b>Status:</b> Draft
<b>Category:</b> Consumer Group - CG001
<b>Tracking No.</b> 80f5859d
<b>Comments Due:</b> October 21, 2011
<b>Submission Type:</b> Web

**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

**Document:** CMS-2011-0140-DRAFT-0079

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## Submitter Information

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## General Comment

My name is Erin Aagesen and I manage a division of Wisconsin Literacy known as Health Literacy Wisconsin. I am also formerly a writer for an HMO, where I became aware of the challenges consumers faced in understanding their insurance policies.

I have had the opportunity to review your Summary of Benefits and Coverage and Uniform Glossary. I want to congratulate you for taking a step in the right direction, as I feel that many elements of these documents are a vast improvement over the majority of existing insurance policies. The glossary is written at the 6th grade level, which is an appropriate level for health documents. I also like the use of visuals on page 4 of the Uniform Glossary, as these will help consumers understand how their insurance benefits may change over time.

Unfortunately, while these documents represent improvements, I have to point out that they still written at a level the majority of Americans will not understand. Twenty percent of Americans read at or below the 5th grade level. And even for consumers with higher levels of literacy, it can be challenging to act on the policy information without appropriate context. Consumers may have strong literacy skills and be highly educated, but not know how to apply the information they read. Dr. Paul Smith of the Wisconsin Research and Education Network (WREN) recently conducted a survey of physicians in Wisconsin, and more than 50 percent of them noted that they do not understand their own insurance policies.

I encourage you to look for ways to help illustrate what may seem like obvious concepts to those in the health care field, but may be extremely confusing and frustrating to the average American. When I worked in insurance, even the concept of a primary care provider was poorly understood – much less terms such as co-insurance, out-of-pocket limits, and networks. We must help consumers understand the entire system and how these elements interact, in addition to providing definitions.