

# PUBLIC SUBMISSION

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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

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## General Comment

I wish to comment on the proposed 10% threshold for translation and oral interpretation of private plan materials in internal review and appeal contexts.

a) Limited English speaking patients pay an undue price in poor health outcomes when they cannot understand the professionals who provide their care.

b) The cost of communicating effectively with these patients does not represent a large percentage of the cost of the care provided.

c) Whatever have been the costs since the implementation of SB853, the cost per unit of service (written translation or oral interpreting) will go down as organizations learn to do the work of communicating more efficiently.

The Civil Rights Act of 1964 is the best bottom line: no discrimination based on race, color or national origin. That law protects every one of us without thresholds.