

# PUBLIC SUBMISSION

<b>As of:</b> July 25, 2011
<b>Received:</b> July 21, 2011
<b>Status:</b> Pending_Post
<b>Tracking No.</b> 80ec8f95
<b>Comments Due:</b> July 25, 2011
<b>Submission Type:</b> Web

**Docket:** EBSA-2010-0019

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

**Document:** EBSA-2010-0019-DRAFT-0071

Comment on FR Doc # 2011-15890

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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. The proposed standards fail to recognize the needs of the 12 million residents in the United States who do not speak English well, over half of whom reside in California. As health plan and insurance members, they pay premiums and receive marketing materials and calls in their primary language, but under these proposed regulations, they would not be able to access plan review and appeals materials to ensure they receive the care they need.