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Group Health Plans and Health Insurance Issuers: Internal Claims and Appeals and External Review Processes

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General Comment

I am a lawyer in Georgia, working mostly with its Latino community, I wish to comment on the 10% threshold for translation and oral interpretation of private plan materials in the internal review and appeals contexts. I do poverty law work with Latino clients in Northwest Georgia. The 10% standard is far too high. A more appropriate standard would be "5% of the plan's population or 500 persons in plan's service area" for large group plans, and 25% of population for small plans. Oral interpretation should be provided in all languages at all times. This should be true in other areas as well, but especially in the health arena where a failure to communicate with a client could be detrimental to their health and their understanding of the services they will receive.