

October 21, 2011

Submitted Electronically

Office of Health Plan Standards and Compliance Assistance
Employee Benefits Security Administration
Room N-5653
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

Attention: RIN 1210-AB52

Dear Sir/Madam:

The National Senior Citizens Law Center (NSCLC), a non-profit-organization whose principal mission is to protect the rights of low-income older adults, submits these comments with respect to the above referenced “Summary of Benefits and Coverage and the Uniform Glossary.”

We think that it is critical to ensure that private health care plans provide information to all persons in plain language, and that appropriate translations and language assistance be provided to limited English proficient (LEP) populations. The ACA requires that information be presented in a “culturally and linguistically appropriate manner and be understandable by the average plan enrollee.”

In order to effectively carry out the intent of the ACA, we recommend the following:

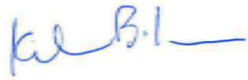
1. Plans should be required to translate the Summary of Benefits and Coverage (SBC) into any language which comprises 5 percent or 500 limited English proficient individuals in the plans.
2. Additionally plans should provide oral language services (through bilingual staff and interpreters) for all LEP individuals with questions.
3. Plans should also provide taglines in at least 15 languages, with every SBC. The taglines would inform recipients of the availability of free interpreter assistance.
4. In order to facilitate usage of the common glossary, HHS should also translate the SBC glossary into the most-used 15 languages, using competent translators.

Further, we support the comments submitted by the National Health Law Program in regard to

the SBC and Uniform Glossary, and incorporate those comments by reference.

Thank you for the opportunity to give input to this process.

Very truly yours,



Katharine Hsiao



Georgia Burke