

PUBLIC SUBMISSION

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Claims Procedure for Plans Providing Disability Benefits; Extension of Applicability Date

Comment On: EBSA-2015-0017-0291

Claims Procedure: Plans Providing Disability Benefits

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Submitter Information

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General Comment

I am opposed to the delay in implementing the new rules. The Department of Labor went to great lengths to promulgate these revised rules, including several months of analyzing comments from the insurance industry and consumer protection firms. The DOL thoughtfully and carefully composed these revised regulations based on more than a decade of experience from the past regulations. After receiving extensive comments and analysis of these comments, the Department of Labor carefully crafted regulations that align with the goals of both the insurance industry and the disability claimants who are affected by these regulations. There has been no substantial proof provided that the regulations would increase costs significantly and in fact in many ways it appears that the regulations would reduce the costs of litigation to insurers by insuring a full and fair appeal process of a denied claim. The DOL took into consideration all of the concerns voiced by all parties, including alleged financial concerns, and crafted regulations that support the goals of the DOL of enforcing ERISA, protecting employees who have employee benefit claims, and reducing the litigation expenses to employers and disability insurers. There has been no significant reason proposed for delaying the implementation of the regulations or any evidence

provided that a delay is necessary. Accordingly, a delay in the implementation of these regulations is unwarranted.