

PUBLIC SUBMISSION

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Docket: EBSA-2015-0017

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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Comment on FR Doc # 2017-22082

Submitter Information

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General Comment

I write to oppose the 90 day delay of the effective date of the Disability Regulations.

I am an attorney primarily representing individuals seeking to overturn denials of their employer provided disability insurance benefits. The new Regulations not only provide more fairness in the decision making process for granting or denying employer sponsored disability insurance, but also more transparency into the decision making process so that participants may know what evidence they have to address, and have a full and fair opportunity to address all of it.

Real people are daily struggling with the real life consequences of disability insurance benefit denials. Further delays in fixing a system that often fails disabled individuals, due to lax regulations, will have serious health and financial consequences for many people.

Implementing the new Regulations without delay is a small price to pay for making sure that claimants whose disability benefits are denied receive a full and fair review of their appeal of that denial. The additional process provided by the new Regulations will result in a more full and fair decision making process, ultimately benefiting all parties involved.

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