

PUBLIC SUBMISSION

Received: July 28, 2020
Tracking No. 1k4-9i2h-bqt0
Comments Due: July 30, 2020
Submission Type: Web

Docket: EBSA-2020-0004
Financial Factors in Selecting Plan Investments

Comment On: EBSA-2020-0004-0002
Financial Factors in Selecting Plan Investments

Document: EBSA-2020-0004-DRAFT-0605
Comment on FR Doc # 2020-13705

Submitter Information

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General Comment

Attention: Proposed rule on Financial Factors in Selecting Plan Investments (RIN 1210-AB95)

To whom it may concern:

I am writing to provide comments in response to the Department of Labor's proposed rule, "Financial Factors in Selecting Plan Investments," which relates to ERISA-regulated retirement plans. I believe this rule should be withdrawn, because it tilts the playing field toward companies and funds that choose not to make values-based investments, thus restricting investor choice. Such a rule would restrict my personal ability to use my savings to "speak" and support initiatives that fit my Christian principles while assuring (within defined risk) my financial security. I do not wish to retire on money that comes from treating communities or life-supporting places as expendable or disposable. I depend upon values-based direction of funds for a successful retirement. I appreciate oversight of financial transparency and security. I *also* should feel free to choose financial instruments that support a future I want for my own family and for this nation. If this rule is enacted, I will be actively prevented from using my savings to make choices that align with my values. How could such a rule arise from a free marketplace, or free speech?

My values are not the only concerns here. Many financial predictions suggest that failure to consider ESG factors is likely to be a failure to consider all material risk factors. Obscuring such factors effectively requires me to put my financial future as well as my the future of my children, and my moral principles at risk.

Additionally, investment managers should be given the right to consider all dimensions associated with their plans, including ESG criteria. ESG criteria has been shown in numerous studies to produce investment performance superior or in line with non-ESG investments. This is because ESG criteria acts as a positive screen for superior funds and does not in any way dissuade from plan managers' pecuniary priorities. Managers should not be shut out from competitive opportunities in the marketplace.

I respectfully ask that the US Department of Labor withdraw this rule and continue to allow plan managers to operate within a free and fair marketplace.

Sincerely,
Heather Eccleston Hunter
active, invested, and concerned citizen
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