

PUBLIC SUBMISSION

Received: October 26, 2017
Status: Pending_Post
Tracking No. 1k1-8zfz-xvzi
Comments Due: December 11, 2017
Submission Type: Web

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

Document: EBSA-2015-0017-DRAFT-0398

Comment on FR Doc # 2017-22082

Submitter Information

Name: Peter Sessions

General Comment

As an attorney working in the field of ERISA benefit disputes, I am writing to oppose the delay in the implementation of the Final Rule regarding claims procedure requirements for disability benefits.

The Final Rule is a valuable update to the ERISA regulations that ensures claimants receive fair treatment from plan administrators. The Department of Labor has already undergone a lengthy review process that took into consideration all arguments for and against the Final Rule, including the costs associated with it, which would be minimal. Indeed, the new Rule will hopefully reduce costs by clarifying the rights and duties of those involved in the benefit claim process.

I see no principled reason to delay the implementation of the Rule. The concerns that have been cited as a purported reason to postpone the Rule's implementation have already been fully vetted.