

CLIENT BULLETIN

Disability Claims Procedures Delayed Until April 1, 2018

The Department of Labor (DOL) has amended the disability claims procedures regulation to change the effective date from January 1, 2018 until April 1, 2018. This 90-day delay is necessary to enable the DOL to carefully consider comments and data as part of its effort, pursuant to [Executive Order 13777](#), to examine regulatory alternatives that meet its objectives of ensuring the full and fair review of disability benefit claims while not imposing unnecessary costs and adverse consequences.

The pre-publication version of the change is available by "[clicking here](#)." This document is scheduled to be published in the Federal Register on November 29, 2017 and will be available online at:

<https://www.federalregister.gov/documents/2017/11/29/2017-25729/claims-procedure-for-plans-providing-disability-benefits-delay-of-applicability-date>.

See [Client Bulletin 2017-04](#), [Benefit News Briefs 2017-56](#) and [Benefit News Briefs 2017-61](#) for more details on the requirements of the disability claims regulation.

Plans that have been amended for a January 1, 2018 compliance date may wish to reconsider delaying that implementation date and amend their plan to reflect an April 1, 2018 effective date. Plans that were in the process of amending for a January 1, 2018 date now have reprieve and can address the matter after the holidays.

We will continue to follow this matter and report on any further delays or changes.

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