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**From:** Mundy, Donna T [DMundy@UNUM.COM]  
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**To:** FN-OMB-OIRA-Submission  
**Subject:** Consent Based Benefit Information System  
**Attachments:** CBBI 5 response to SSA 9 10 07 Desk Officer for SSA.doc

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9/11/2007

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**Desk Officer for SSA  
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**On behalf of Unum, I am responding to the Federal Register notice published on August 10, 2007 by the Social Security Administration (SSA) under the provisions of the Paperwork Reduction Act of 1995 (PRA), pp. 45079-45080.**

**Unum, formerly UnumProvident, is one of the leading providers of employee benefits products and services, and the largest provider of group and individual disability income protection insurance in the United States and the United Kingdom. Through its insurance subsidiaries, Unum is the industry leader in group and individual income protection and related coverages and services, insuring more than 22 million people.**

**Headquartered in Chattanooga, Tennessee, Unum has significant U.S. operations in Portland, Maine, Worcester, Massachusetts, Glendale, California and Columbia, South Carolina (Colonial Life & Accident Insurance Company) and in the United Kingdom, Dorking, England. The Company employs more than 10,000 people worldwide. In 2006, Unum reported revenue of more than \$10.5 billion which included \$7.95 billion in premium income. Total assets on December 31, 2006 totaled \$52.8 billion and shareholder equity stood at \$7.7 billion.**

**Unum applauds SSA's efforts to develop a fee-based web service system, and we speak most specifically to the development of the Consent Based Benefits Information System (CBBI), which we believe will provide**

**economies of scale to: the disability insurers who will now be receiving current information, thereby insuring accurate payments to their insured clients; to the Social Security Administration by reducing the field office workload; and to the consumer/beneficiary who will now be receiving an**

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**integrated and predictable award through an expedited process.**

**CBBI would be an effective technology for many industries, especially insurance companies which annually provide millions of employed individuals with disability insurance coverage. Those employees are also payers to Social Security Disability Insurance (SSDI). Should a worker become a claimant of disability insurance, he/she generally receives disability benefits of 60% of one's previous earnings. After a lengthy disability period with a serious impairment that is expected to continue and/or worsen, many claimants apply for SSDI benefits. While the Social Security Administration processes an individual's claim for SSDI benefits, private carriers maintain their financial commitment to the claimant, frequently as the claimant's sole source of income, while also continuing to manage the claimant's RTW efforts and applying strong case management techniques. If a claimant is granted SSDI benefits, insurers proceed (according to their contract) to offset and adjust the monthly amount of the claim payment with the new SSDI payment. In order to determine the correct new payment, as well as reduce overpayments to these joint customers, the disability insurer must obtain accurate, verifiable and timely information regarding the status of the pending SSDI application, both during the determination process, as well as upon and following receipt of the benefit. The use of technology to coordinate determination status and ensure proper payment is essential.**

**For the last six years, the disability insurance industry has been in discussions with SSA to develop a Benefit Verification System, similar to the proposed CBBI. We believe that the Agency would concur that we have reached a level of accommodation that includes:**

- An agreement that applications will be submitted to SSA electronically, with general acceptance from the industry;**
  - A system design that is agreed upon by the industry and acceptable to SSA;**
  - An agreement that the cost of the system is reimbursable, and**
  - An agreement that the cooperation of the insurance industry is in line with the core mission of the Agency: to provide prompt, integrated, accurate and timely payments to those beneficiaries**
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**whom we both serve.**

**In order to build upon our previous discussions and develop a successful CBBI system, we suggest that several key issues need to be carefully addressed:**

- **CBBI must provide accurate eligibility and payment data as related to SSDI applicants and beneficiaries in order to support SSA's stewardship responsibilities and avoid under or overpayments. This will provide predictability to the beneficiaries as they adjust to a now-changed lifestyle.**

- **As a new business process, CBBI must be developed so that claimant information and a claimant's authorization to share personal information are protected through use of secure electronic transmissions (similar to submission of e-health records) and subject to compliance audits utilizing currently accepted business practices. Industry and SSA should develop mutually acceptable standards regarding privacy and data retention. CBBI development should also include a comprehensive review of the proposed SSA Authorization Form so that all items necessary to successful implementation are included.**

- **Any discussions regarding reimbursement to SSA for start-up and ongoing operations costs of CBBI should include consideration of a user fee schedule.**

**As the world's leading disability insurer, Unum believes this new electronic effort is also extremely important to SSDI applicants and claimants themselves. Annually, private disability companies advance billions of dollars to potential SSDI beneficiaries because we want to ensure that their needs and lifestyle are not further diminished while waiting for an SSDI determination. We believe that such a CBBI system would significantly enhance the timely and accurate award of benefits which would be correctly paid, without bothersome inquiries to either SSA field offices or beneficiaries.**

**With our aging society, more persons are expected to apply for private and public disability benefits. Unum believes that all applicants should expect that the best technology will be used to determine and process their claims**

**in the most cost effective and timely manner. CBBI is an important and modern answer to the use of technology to best serve our joint customers and can be a coordinated and successful effort for the public and private disability insurers as well as the new beneficiary.**

**Unum applauds SSA's efforts to address the increased changing data demands emanating from the private sector. As SSA proceeds through the planning and implementation stages, we urge prompt implementation of a CBBI system. We recognize SSA's efforts to date in modernizing the disability claims process and to advancing automation; we support the use of advanced technology to coordinate the entire disability determination process, and believe that the CBBI will significantly assist in achieving this goal.**

**SSA may be assured that Unum stands ready to provide whatever support is necessary. We are committed to work with appropriate officials to ensure that the Social Security Administration receives the necessary funding to develop and implement the CBBI system in a manner that is most beneficial to our co-beneficiaries. Thank you for the opportunity to comment on this important proposal.**

**Sincerely,**

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