



COMMONWEALTH OF MASSACHUSETTS
Office of Consumer Affairs and Business Regulation
DIVISION OF INSURANCE

1000 Washington Street, Suite 810 • Boston, MA 02118-6200
(617) 521-7794 • <http://www.mass.gov/doi>

DEVAL L. PATRICK
GOVERNOR

TIMOTHY P. MURRAY
LIEUTENANT GOVERNOR

GREGORY BIALECKI
SECRETARY OF HOUSING AND
ECONOMIC DEVELOPMENT

BARBARA ANTHONY
UNDERSECRETARY OF CONSUMER AFFAIRS
AND BUSINESS REGULATION

JOSEPH G. MURPHY
COMMISSIONER OF INSURANCE

Interstate Insurance Product Regulation Commission
Management Committee c/o Karen Schutter
444 North Capitol Street, NW, Suite 701 Hall of States
Washington DC 20001-1509

August 23, 2011

RE: Public Comments on Developing IIPRC Disability Income Standards

To The Members of the Management Committee-

Thank you for soliciting public comments on these developing standards. Massachusetts would like to make the following comments regarding the standards as they are now drafted.

- We are concerned that “Partial Disability” and “Residual Disability” are interchangeable, as this may result in some confusion amongst consumers. If these terms mean the same thing, why do these standards (**Individual Disability Business Overhead Expense Insurance Policy Standards** as well as **Standards for Individual Disability Income Policies**) contain both terms?
- The lists of “Permissible Limitations and Exclusions” and “Incidental Benefit Provisions” do not contemplate any future development of benefits or limitations not currently in the market. We would suggest outlining a process for reviewing items not on these lists as the products evolve. This would also apply to both the **Individual Disability Business Overhead Expense Insurance Policy Standards** as well as **Standards for Individual Disability Income Policies**.
- In the **Standards for Individual Disability Income Insurance Application Change Forms**, there are two number “vii”s listed on page 16, listed in “Medical Questions” under “Disorders and Diseases”.

I look forward to discussing these issues further with the Committee.

Thank You,

Edward Charbonnier,
Director, Policy Form Review,
Massachusetts Division of Insurance