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Additional Claims and Appeals Guidance

In September 2010, the DOL issued Technical Release 2010-02, which set forth an enforcement grace period until July 1, 2011 for compliance with some but not all of the new provisions of the claims and appeals procedures until July 1, 2011. DOL has now issued, Technical Release 2011-01, which modifies and extends the enforcement grace period. Subject to certain exceptions, the grace period is extended to January 1, 2012 for calendar year plans. A copy of the release can be found at the following website: http://www.dol.gov/ebsa/newsroom/tr11-01.html