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February 3, 2025

**RE: Concerns with LD 61 "An Act to Regulate Employer Surveillance to Protect Workers"**

Senator Tipping, Representative Roeder, and Committee Members –

Unum is the nation's leading disability insurance company, proudly operating in Maine since our foundation here 175 years ago. Unum employs approximately 2,300 Mainers, most of whom work from our campus in Portland, but many enjoy the flexibility of our hybrid approach that allows for remote work across the State of Maine. Unum serves nearly 45 million individuals through our various financial protection products and services, and as you can imagine, the integrity and safety of our customer data is our top concern.

At Unum, we are tasked with handling extremely sensitive customer data every day. This includes financial information, medical and health records, and personally identifiable information of our customers. Monitoring the work of our employees ensures they are following the right processes and protocols when they are evaluating customer claims. We are also required to ensure claims are being processed on a timely basis. This Act could handcuff our ability to maintain the highest quality output as it relates to compliance and risk decisions, obligations under both the U.S. Department of Labor as well as Departments of Insurance in all fifty states.

Our employees are responsible for making benefit payments to claimants, processing claims based on medical records, and interacting directly with our customers. Our clients expect us to follow the highest ethical practices and make sound risk-based decisions regarding their claims. In 2023, we paid nearly \$8 billion in benefits and served over 174,000 companies seeking to provide their employees with robust benefits packages at work.

It is our duty to maintain accuracy and integrity at every step in this process. Should an issue arise, Unum is responsible for investigating actions by using tools that we fear may be prohibited under interpretations of LD 61, even if such situations do not align with this legislation's intent.

Where our employees are concerned, this Act would negatively impact our ability to effectively coach and train our employees, thus reducing employee development potential and continuous improvement opportunities. People Managers need the ability to ensure workers are using our tools effectively, treating clients respectfully and to use pertinent information to follow up on any customer feedback that may need to be addressed.

We kindly ask that you consider the negative impact on financial services institutions, as well as the unique regulatory environment that we operate within. We urge you to safeguard our ability to keep our employees safe, to protect our business, and to best serve our customers.

Sincerely,

Umberto Speranza  
VP, Corporate Initiatives  
Unum Group