

**K. Level Two Appeal Item Number Eleven (11)**

**Cigna disregards Social Security award.**

In 2001 Cigna went to great lengths to urge Mr. XXXX to apply for Social Security benefits, including threatening to reduce his benefit by an estimated amount. Mr. XXXX completed the Social Security application and was awarded benefits by Social Security. Upon receipt of the award, Cigna requested retroactive reimbursement for "overpayment" of insurance benefits. Cigna benefited from the favorable outcome due to the coordination of benefits between Social Security and the Long Term Disability policy.

It is entirely inconsistent for Cigna to selectively disregard the Social Security determination of disability when Cigna, to lighten its costs, essentially coerced Mr. XXXX to demonstrate total disability to the Social Security Administration and now has denied that Mr. XXXX is totally disabled under his policies. The definition of disability contained in the policy is consistent with the Social Security. Moreover, neither Dr. XXXX nor Ms. XXXX was provided with any of Mr. Reilly's medical or vocational information pertaining to his award of SSDI by the Social Security Administration for their review.