

May 21, 2025

The Honorable Lori Chavez-DeRemer
Secretary of Labor
U.S. Department of Labor
200 Constitution Ave NW
Washington, D.C. 20210

Re: Department of Labor Retirement Security Rule

Dear Secretary Chavez-DeRemer:

As organizations and individuals representing seniors, working families, retirement investors, fiduciary investment professionals, labor, and economic policy experts, we are writing to thank you for your support of the Department of Labor's Retirement Security Rule and urge you to continue to defend the rule, which is a major accomplishment in the fight to improve our nation's retirement income security. The rule is critical to protecting the financial well-being of hard-working Americans.

The rule will require financial professionals who provide retirement investment advice to put the best interests of their clients ahead of their own financial interests. By taking this essential step, the rule will help all Americans—many of whom are responsible for making their own decisions about how best to invest their retirement savings—keep and grow more of their hard-earned savings so they can enjoy a more financially secure and independent retirement.

The rule addresses critical gaps in regulation such as:

- One-Time Advice/Rollovers: Ensuring that one-time advice, such as recommendations about rollovers, is covered under fiduciary protections.
- Non-SEC Regulated Products: Extending protections to advice regarding assets not covered under the SEC's Best Interest regulations, including real estate and certain insurance products.
- Advice to Plan Sponsors: Covering advice to plan fiduciaries, ensuring that employers receive unbiased recommendations for their retirement plans.

It is small account holders and moderate-income retirement savers who stand to benefit most from this rule. The academic literature and real-world experience make clear that it is the less wealthy, often financially unsophisticated retirement savers who are most at risk when it comes to recommendations that are not in their best interests. Too often, those recommendations promote investment products with high costs, substandard features, elevated risks, or poor returns. While the financial adviser makes a substantial profit off these recommendations, the retirement saver pays a heavy price for investment advice that is not in their best interest, amounting to tens or even hundreds of thousands of dollars in lost retirement income. The cumulative harm to all American retirement savers from these conflicts of interest could add up to tens of billions of dollars a year.

Strengthening the protections for hard-working Americans who are saving for a financially secure and independent retirement is a key priority for our organizations, and to its credit, the DOL has worked diligently to make important and necessary changes to an outdated, 50-year-old rule. As you are aware, there are ongoing efforts to challenge this rule in court. We urge you to continue your support for the Retirement Security Rule and to defend it vigorously against any attempts to undermine it. The financial security of countless Americans depends on the protections this rule provides.

Thank you once again for your leadership and dedication to enhancing the retirement security of all Americans. With your continued support, we can ensure a more secure and dignified retirement for everyone.

Sincerely,

AARP

Affordable Homeownership Foundation Inc

AFL-CIO

American Federation of State, County & Municipal Employees

Americans for Financial Reform

Asset Building Strategies

Better Markets

Center for Economic and Policy Research

Center for Economic Integrity

Consumer Federation of America

Delaware Community Reinvestment Action Council, Inc.

Economic Policy Institute

FL National Organization for Women

Gerontological Society of America

Greater Orlando National Organization for Women

Institute for the Fiduciary Standard

International Plate Printers, Die Stamper, Plate Makers & Engravers of North America

Just Strategy

Justice in Aging

National Association of Personal Financial Advisors (NAPFA)

National Committee to Preserve Social Security and Medicare

National Consumers League

National Education Association

National Employment Law Project

National Women's Law Center

Pension Rights Center

Public Citizen

Public Investors Advocate Bar Association

Public Justice Center

Social Security Works

UnidosUS

Unitarian Universalists for Social Justice

Virginia Citizens Consumer Council

Signing as an individual:

The Honorable Phyllis C. Borzi, Independent Consultant and Former Assistant Secretary for
Employee Benefits Security of the United States Department of Labor

Prof. Dana Muir, Robert L. Dixon Collegiate Professor of Business, University of Michigan

Professor Robert Pollin, University of Massachusetts Amherst

Prof. Peter Wiedenbeck, Washington University in St. Louis

Prof. James A. Wooten, University at Buffalo School of Law, The State University of New York