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by Barry Lipton, Katy Porter, and Gary Nelson Actuarial & Economics Division, NCCI

Workers Compensation Temporary Total Disability Indemnity Benefit Duration

Temporary Total Disability indemnity benefits are provided to injured workers to replace wages—and other specified costs such as vocational rehabilitation—while the claimant is recovering from a work-related injury or illness and is not able to work. Claim duration is the number of compensated days of lost wages.

Key Findings

Countrywide, the duration of Temporary Total Disability (TTD) indemnity benefits increased from about 92 days to 129 days between 1996 and 2001 and has remained fairly constant from 2001 to 2007. We estimate that the current average countrywide TTD ultimate duration is about 125 days.

TTD duration varies significantly by state. For example, South Dakota has an average TTD duration of 63 days, while Louisiana has an average TTD duration of 196 days. Many states followed the countrywide pattern above of change in duration over time, but a few states have substantially different patterns. For example, in Florida, Senate Bill 50A in 2003 appears to have reduced claim duration.

The median¹ countrywide duration of TTD benefits is much lower, at about 42 days. Median TTD duration by state ranges from a low of 14 days in Hawaii to a high of 94 days in Texas.

The median countrywide duration for claims that do not include any permanent benefits is 27 days, while the median duration of TTD benefits on claims that eventually also include payments for permanent impairment benefits is 111 days.

Study Design

Data for this study was from claims with injury dates from 1996 to 2007 for which Temporary Total Disability (TTD) benefits had been paid.² Duration of TTD benefits was determined by adding up the number of distinct compensated days reported on indemnity payment transactions. The data was edited for reasonableness, removing less than 1% of the claims, as discussed in the methodology section in Appendix I.

Lump sum settlements have been included where the compensated days were listed as part of the payment. If a settlement transaction only included a single covered day, then only that one day was included as part of the claim duration.

Temporary Partial Disability (TPD) benefits, which supplement a worker's wages while on light duty or on a reduced schedule, were not included in this study.

Countrywide Results

The duration of TTD indemnity benefits increased by accident year (AY) between 1996 and 2001 and has remained fairly level between Accident Years (AYs) 2001 and 2007, as shown in Exhibit I. In this exhibit, each line represents the average duration of claims for the accident years at the specified maturity. For example, the line denoted 36 months displays the average durations of TTD benefits for each accident year through 36 months from the start of the accident year. So, for AY 2005, this is the average duration of payments through December 31, 2007, while for AY 2000, this is the average duration

¹ The median duration represents the point at which 50% of claims have shorter duration and 50% of claims have longer duration.

² The database used is a transactional level database, licensed to NCCI.

through December 31, 2002.

Average duration at the 12-month valuation increases from AY 1996 to AY 2001 and then is relatively flat through AY 2007. A similar pattern is evident at the other claim maturities.

Average duration increases as the AYs mature, as indicated by the fact that the curve at the 24-month maturity shows longer average durations than the curve at the 12-month maturity. As an example of why this occurs, consider a claim with an injury date in December 2001 that has 20 days of TTD paid in 2001 and 60 days of TTD paid in 2002. At the 12-month valuation of AY 2001, this claim has a duration of 20 days of TTD, while at the 24-month valuation, this claim has a duration of 80 days of TTD.

In Exhibit 1, as accident years mature the increase in average duration from one evaluation to the next drops off as fewer claims continue to have TTD benefits being paid. There is minor development even after 72 months. In most cases, these are lost-time benefits for injured workers who continue to be on Temporary Total Disability for many years.

Note also that the gap between curves for different maturities widens at second, third, and even fourth and fifth valuations, through AY 2001. The gap widths stabilize after AY 2001, as countrywide duration levels out.

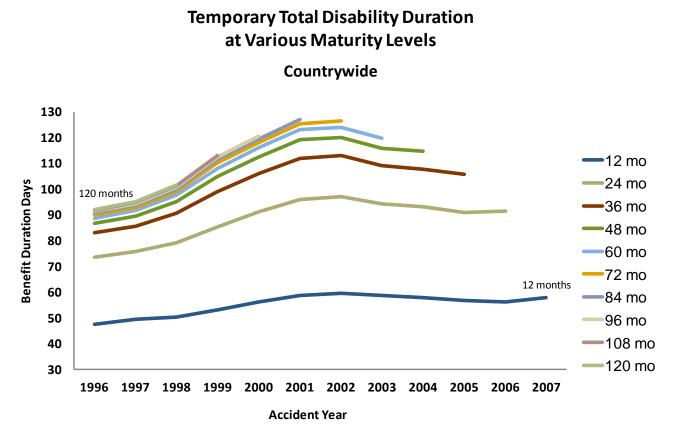


Exhibit 1

(Countrywide includes AK, AL, AR, AZ, CO, CT, DC, FL, GA, HI, IA, ID, IL, IN, KS, KY, LA, MD, ME, MO, MS, MT, NC, NE, NH, NM, NV, OK, OR, RI, SC, SD, TN, TX, UT, VA, and VT.)

Exhibit 2 shows the estimated duration for each accident year projected to 120 months of maturity. Because there seems to be minimal development of average TTD durations beyond 120 months, these can be considered to be estimated ultimate TTD durations.

To calculate this curve, we used historical duration development factors to produce age-to-age link ratios. These link ratios were used to estimate additional development beyond December 31, 2007 for each accident year.

The duration increase in the latter half of the 1990s is evident in Exhibit 2. For AY 2007, the estimated mean ultimate duration is 124 days.

The pattern in Exhibit 2 is consistent with NCCI's ongoing frequency studies, which find that the long-term reduction in frequency was driven more by smaller claims through AY 2002.

Temporary Total Disability Duration

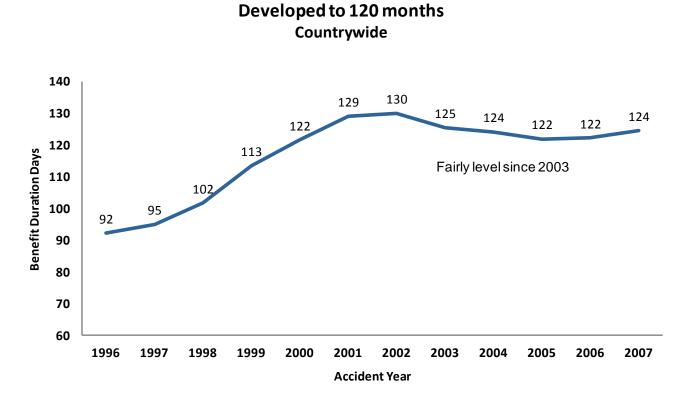


Exhibit 2

(Countrywide includes AK, AL, AR, AZ, CO, CT, DC, FL, GA, HI, IA, ID, IL, IN, KS, KY, LA, MD, ME, MO, MS, MT, NC, NE, NH, NM, NV, OK, OR, RI, SC, SD, TN, TX, UT, VA, and VT.)

Exhibit 3 was taken from one of NCCI's ongoing frequency studies, available on **ncci.com**. The bars represent the annual frequency changes by size of loss group. Notice how, during this period, the pattern of frequency declines by size of claim changed. For Policy Expiration Years 2001 and 2002, a decrease in frequency for the smaller claims (including TTD claims with shorter durations) dominated the countrywide frequency decline. For Policy Expiration Years 2003 and 2004, frequency reduction is shared more evenly by all claim sizes. When the frequency decline was dominated by smaller claims, Exhibit 2 shows that average duration increased.

Year-to-Year Change in Lost-Time Frequency by Size of Loss Group

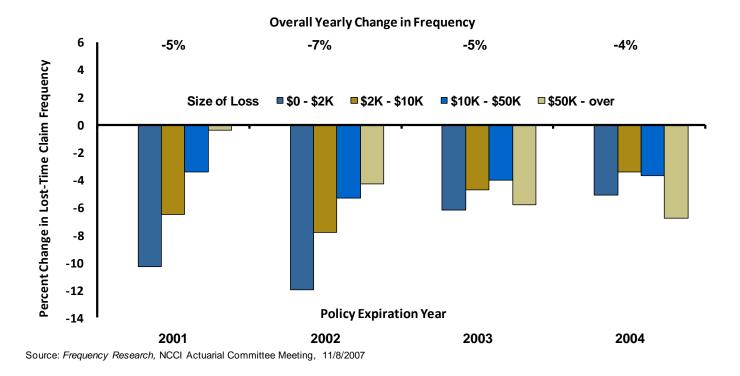


Exhibit 3

Exhibit 4 shows distributions of TTD durations at 84 months for two types of TTD claims:

- Pure TTD—TTD claims for which there has been no compensation for permanent impairment by 84 months.
- Healing Period TTD—TTD claims for which Permanent Partial Disability benefits have also been paid by 84 months. These claims are referred to as healing period TTD claims because TTD benefits are paid until the claimant reaches maximum medical improvement at which time, permanent benefits, if any, become payable.

We show these distributions at 84 months maturity because, by this stage of development, most TTD claims are closed.

Pure TTD claims have shorter average durations than healing period TTD claims. For any given number of days, a lower proportion of healing period TTD claims have durations less than the number of days that pure TTD claims have. For example, 24% of healing period TTD claims have a duration of 42 days or less, while 64% of pure TTD claims have a duration of 42 days or less. Pure TTD claims have a median duration of 27 days, while healing period benefits have a median duration of 111 days.

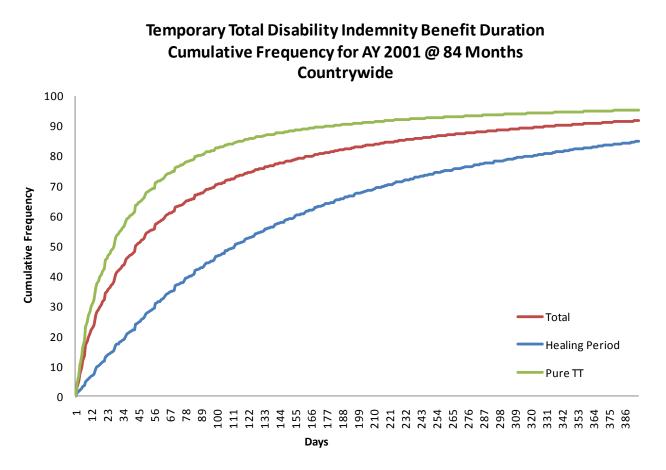


Exhibit 4

(Countrywide includes AK, AL, AR, AZ, CO, CT, DC, FL, GA, HI, IA, ID, IL, IN, KS, KY, LA, MD, ME, MO, MS, MT, NC, NE, NH, NM, NV, OK, OR, RI, SC, SD, TN, TX, UT, VA, and VT.)

The increase in duration through the latter 1990s can be seen in Exhibit 5, at 36 months, for all TTD claims, pure TTD claims, and the healing period of PPD claims. At 36 months, about 67% of these claims are pure TTD. This percentage has been consistent through the 10 years from AY 1996 through AY 2005. Thus, changes in duration are not due to a change in mix of injury type.

However, the leveling off of duration for all claims after AY 2001, which is shared by pure TTD claims, is somewhat different for healing period TTD claims. The duration of the healing period at 36 months has declined since AY 2001, so that the duration for AY 2005 healing period TTD claims at 36 months is back down to the corresponding duration for AY 1996 claims.

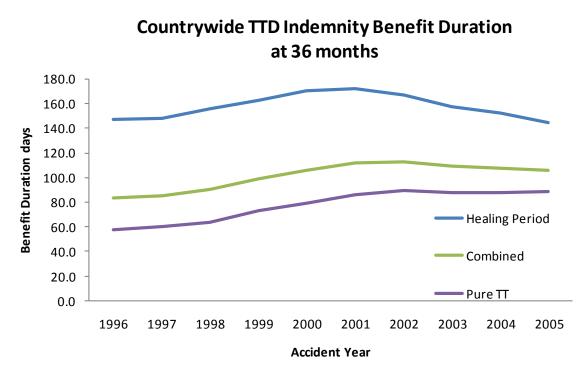


Exhibit 5

(Countrywide includes AK, AL, AR, AZ, CO, CT, DC, FL, GA, HI, IA, ID, IL, IN, KS, KY, LA, MD, ME, MO, MS, MT, NC, NE, NH, NM, NV, OK, OR, RI, SC, SD, TN, TX, UT, VA, and VT.)

Selected State Results

State results are influenced by the state benefit structure, regulatory and judicial environments, and the efficiency of claim systems.

One state difference in benefit structure is the waiting period—the first few days of lost time—prior to eligibility for WC benefits. Most states also have a retroactive clause; when an injured worker is disabled longer than the retroactive days, the waiting period is reimbursed. Table 1 in Appendix II displays the waiting period, retroactive days, and the median TTD indemnity benefit duration by state.

In Exhibit 6, the AY 2005 average TTD Indemnity benefits duration as of 36 months is compared for each state reviewed. The state average durations can be compared with the overall average study duration of 106 days. While there is some variation from year to year, the results below are representative of state differences.

The remainder of this section comments on some specific states.

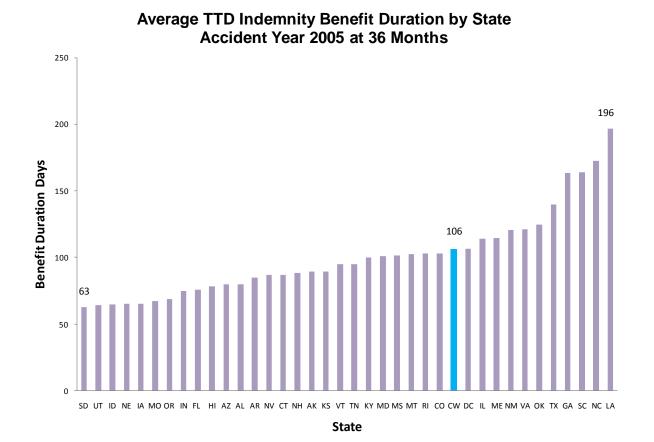
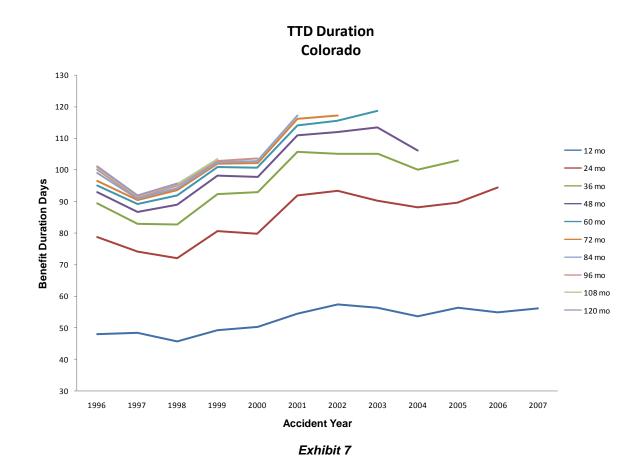


Exhibit 6

Colorado

Colorado's pattern of TTD duration looks similar to that of the countrywide pattern in Exhibit 7. Duration continues to develop after 36 months, and the duration in AY 2001 is about 20% higher than in AY 1996.

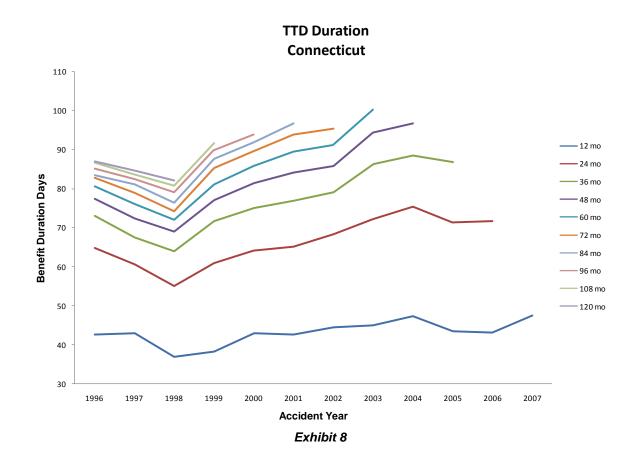


Colorado quick facts:

- Waiting/retroactive period: 3 days/14 days
- Maximum TTD benefit as a percentage of state average weekly wage (SAWW): 91%
- Maximum TTD weeks: Until maximum medical improvement (MMI) or return-to-work release
- No significant reform in period

Connecticut

Connecticut's pattern of TTD duration looks somewhat different from countrywide in Exhibit 8. Duration continues to develop noticeably, even after 84 months. The increase in duration appears to have continued until AY 2004, a bit later than countrywide.



Connecticut quick facts:

- Waiting/retroactive period: 3 days/7 days
- Maximum TTD benefit as a percentage of SAWW: 100%
- Maximum TTD weeks: Duration of disability
- No significant reform in period

Florida

In Florida, duration develops little beyond 48 months, although benefits are provided for the duration of the disability. In Exhibit 9, there is a substantial decline in duration beginning in AY 2002. In Florida, the significant reforms of Senate Bill 50A became effective on October 1, 2003. In addition, Florida experienced a building boom beginning in AY 2002. The construction industry was actively employed in housing growth and rebuilding following severe damages due to several hurricanes. This provided an incentive for workers to return quickly to high paying jobs and the potential for overtime wages.

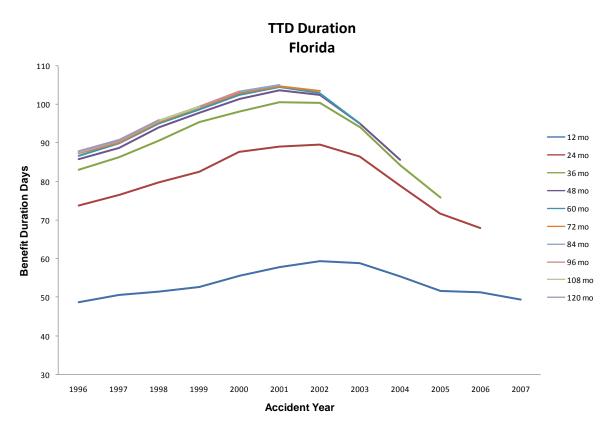


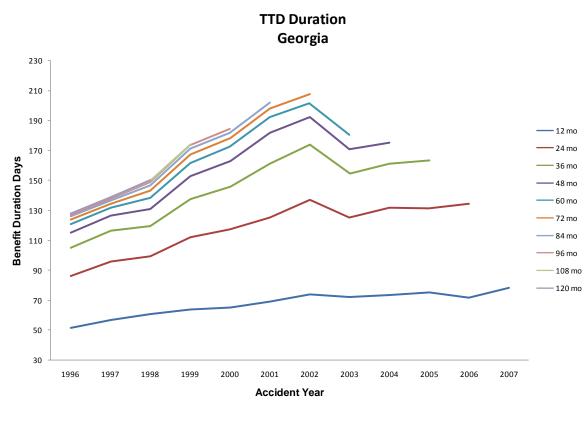
Exhibit 9

Florida quick facts:

- Waiting/retroactive period: 7 days/21 days
- Maximum TTD benefit as a percentage of SAWW: 100%
- Maximum TTD weeks: Duration of disability
- Significant reform: SB 50A effective October 1, 2003. Attorney compensation went from hourly to a percentage of benefits. The impact is -4.1% on TTD and -19.5% on PPD losses.

Georgia

In Georgia the rise in TTD duration is among the highest of the states, increasing by 80 days from AY 1996 to AY 2002. However, since AY 2002, the duration in Exhibit 10 appears to have at least flattened and even moderated somewhat at the later evaluations. There are no significant reforms in the period.





Georgia quick facts:

- Waiting/retroactive period: 7 days/21 days
- Maximum TTD benefit: \$500 per week; SAWW is over \$800
- Maximum TTD weeks: 400 weeks
- Significant reform: In Georgia, the maximum benefit is changed by law. This has generally occurred every year or two, most recently in 2007.

Illinois

Illinois experienced an increase in TTD indemnity benefits duration that continued beyond the early 2000s. The increase in the 12-month valuation, from 40 days in AY 1996 to more than 60 days in AY 2007, shown in Exhibit 11 is the highest among the larger volume states. In Illinois, a TTD claim is closed at a hearing. More liberal judgments over the last decade have been one of the factors causing a higher increase in compensated days in this state. The driving force is pure TT claims, because the change in the duration at 36 months of the healing period of PPD claims has only increased about 20% between AY 1996 and AY 2005, while pure TT duration has doubled in the same period.

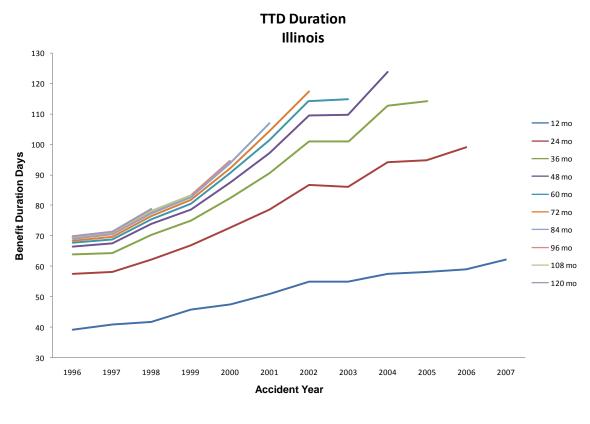


Exhibit 11

Illinois quick facts:

- Waiting/retroactive period: 3 days/13 days
- Maximum TTD benefit as a percentage of SAWW: 133%
- Maximum TTD weeks: Duration of disability
- Significant reform: House Bill 2127 increased PPD duration effective February 1, 2006. The effect of this increase is 0.9% on TTD and 9.0% on PP.

Louisiana

Louisiana's TTD indemnity disability benefit duration in Exhibit 12 is relatively high. Duration climbed steeply to an average of over 240 days. Duration development continues even after 84 months.

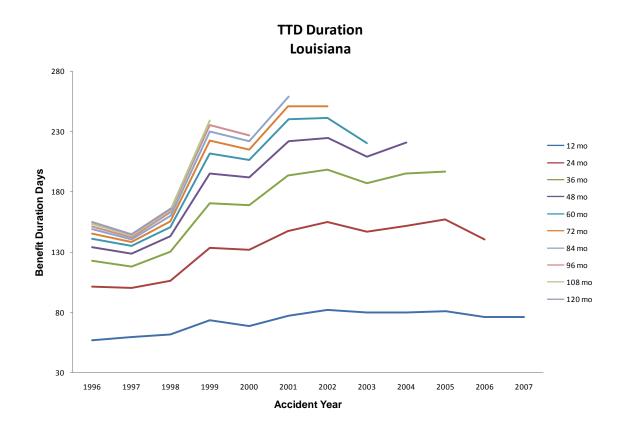


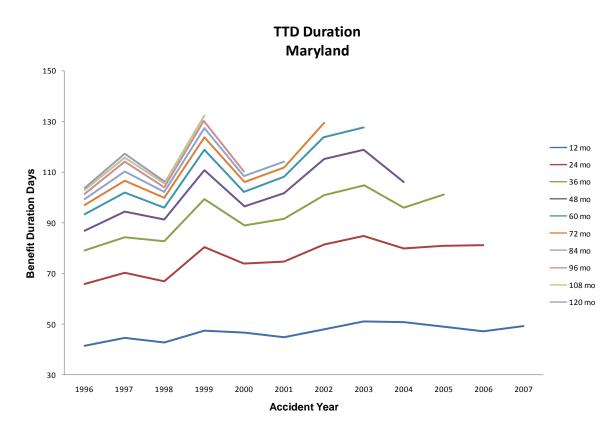
Exhibit 12

Louisiana quick facts:

- Waiting/retroactive period: 7 days/41 days
- Maximum TTD benefit as a percentage of SAWW: 75%
- Maximum TTD weeks: Length of disability
- No significant reform in period

Maryland

Maryland's average duration has been increasing, but the results by accident year are more varied than in most states. In Exhibit 13, it is clear that there is noticeable development beyond 60 months.



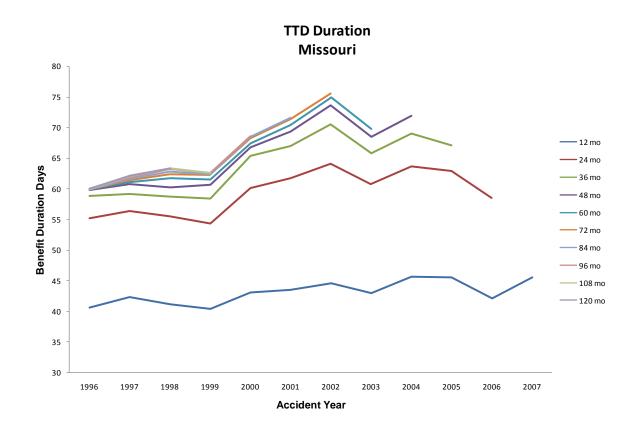


Maryland quick facts:

- Waiting/retroactive period: 3 days/14 days
- Maximum TTD benefit as a percentage of SAWW: 100%
- Maximum TTD weeks: Duration of disability
- Significant reform: The Harris v. Board of Education of Howard County decision on June 6, 2003 impacted PPD and TTD by 2.2%.

Missouri

The duration of TTD benefits in Missouri is lower than in most other states, with the average topping out at about 70–75 days. The shorter three-day waiting period is a likely contributor to the relatively low average duration. Exhibit 14 displays an increase from AY 1999 to AY 2002. The average duration since AY 2002 has been inconsistent, but appears to have moderated.





Missouri quick facts:

- Waiting/retroactive period: 3 days/14 days
- Maximum TTD benefit as a percentage of SAWW: 105%
- Maximum TTD weeks: 400 weeks
- No significant reform in period

Oklahoma

Oklahoma's duration graph looks fairly comparable to the countrywide graph. Exhibit 15 shows the increase in duration during the 1990s and a leveling off after AY 2001. The major reform in SB 1X in 2005 might be contributing to the decline in duration at 12 months in AY 2006 and AY 2007.

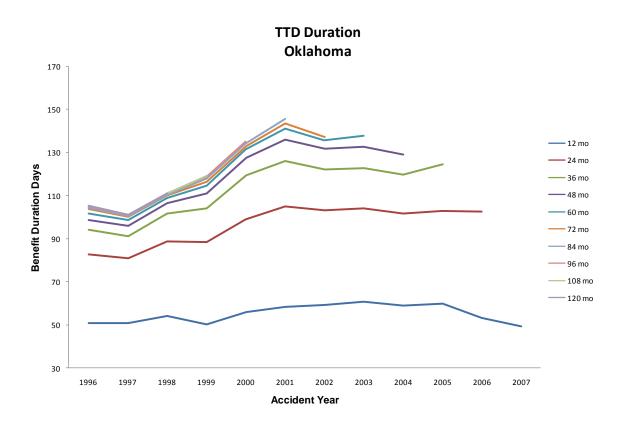


Exhibit 15

Oklahoma quick facts:

- Waiting/retroactive period: 3 days/not retroactive
- Maximum TTD benefit as a percentage of state average weekly wage (SAWW): 100%
- Maximum TTD weeks: 300 weeks
- Significant reform: On July 1, 2005 and November 1, 2005, Senate Bill 1X, a major reform, reduced PPD losses by 20– 30% and TTD by almost 30%

Oregon

Oregon's duration pattern in Exhibit 16 does not display the increase during the 1990s seen in so many other states. Instead, with a few exceptions (a spike in AY 2001), the pattern has been quite consistent. The spike is due to a higher duration in the healing period claims, rather than the pure TTD claims, which did not have the same increase. Also, the average claim duration in Oregon is at the low end compared with other states (see Exhibit 6) in spite of no specified benefit maximum duration.

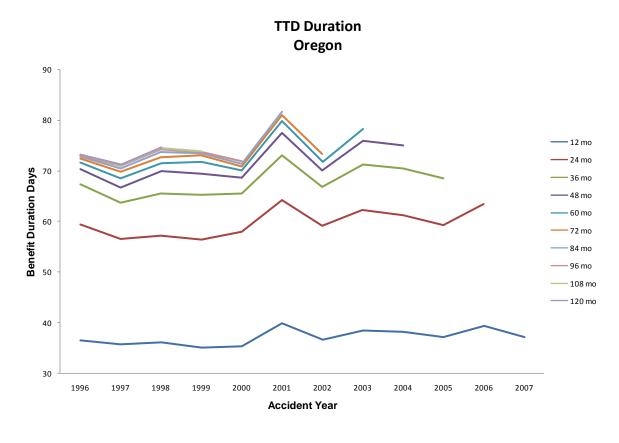


Exhibit 16

Oregon quick facts:

- Waiting/retroactive period: 3 days/14 days
- Maximum TTD benefit as a percentage of state average weekly wage (SAWW): 133%
- Maximum TTD weeks: None stated
- Significant reform: Senate Bill 485, effective January 1, 2002, increased PPD by 10.2% and TTD by 6.7%. This bill
 increased the maximum TTD benefit from 100% to 133% of the SAWW and changed the compensation rates per
 degree.

South Carolina

In South Carolina, the increase in duration started in AY 1998 and continued, to a lesser extent, through AY 2007. In Exhibit 17, the higher durations are in large part due to increased compensated time after 24 months. In AY 1998, an average claim developed an additional 30 days after 24 months, while in AY 2004 the development is over 60 days after 24 months.

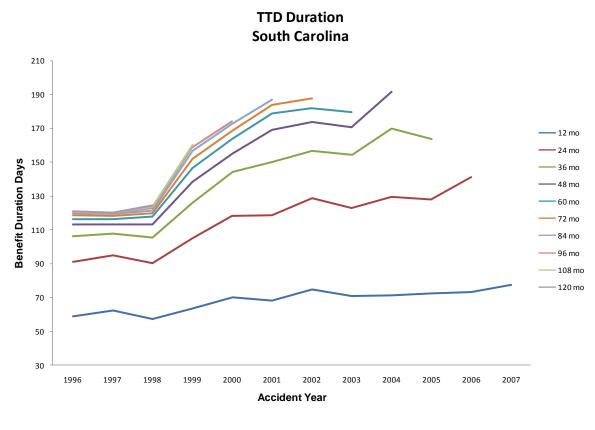


Exhibit 17

South Carolina quick facts:

- Waiting/retroactive period: 7 days/14 days
- Maximum TTD benefit as a percentage of state average weekly wage (SAWW): 100%
- Maximum TTD weeks: 500 weeks
- Significant reform: R 147, effective June 25, 2003, eliminating the unknown condition clause from the Second Injury Fund reimbursements. Impact: 15.8% on both TTD and PPD claims.

Tennessee

Tennessee's graph is unusual in the persistence of the trend in duration increase. The average duration is still low compared with other states, but is continuing upward. The step down in AY 2005 could be due in part to HB 3531. There is little development beyond 36 months in Tennessee, as seen in Exhibit 18.

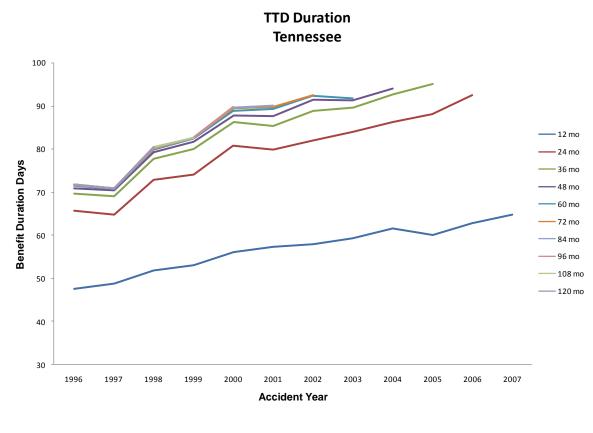


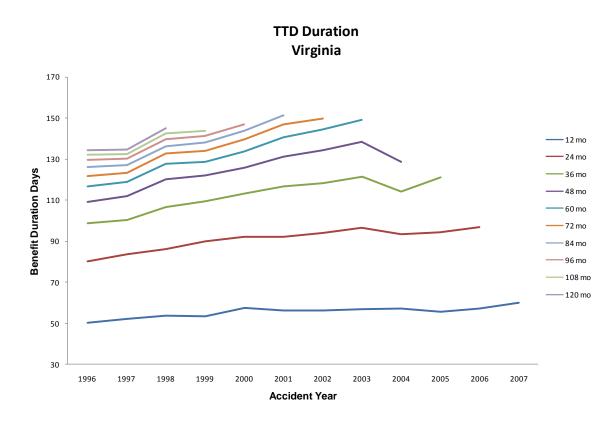
Exhibit 18

Tennessee quick facts:

- Waiting/retroactive period: 7 days/14 days
- Maximum TTD benefit as a percentage of state average weekly wage (SAWW): 110%
- Maximum TTD weeks: 400 weeks
- Significant reform: House Bill 3531, step 1, effective July 1, 2004. The impact is –17% on PPD and 1.3% on TT. Highlights included a reduced maximum PPD multiplier for some claims, an increase in the maximum weekly benefit for TTD from 100% to 105% of SAWW, and mandatory benefit review conferences.

Virginia

The average duration of TTD benefits in Virginia has risen modestly through at least AY 2003. Exhibit 19 shows that Virginia is one of the states where development on some claims continues for many years since there is noticeable development for all AYs at each valuation.





Virginia quick facts:

- Waiting/retroactive period: 7 days/21 days
- Maximum TTD benefit as a percentage of state average weekly wage (SAWW): 100%
- Maximum TTD weeks: 500 weeks
- Significant reform: None in this period

Possible Future Research

Waiting periods are the days during which injured workers are not compensated for lost work-time. By including only claims with more than seven days of lost time in multistate comparisons, the different waiting periods in the states could be addressed.

Appendix I–Methodology

NCCI reviewed 1.2 million TTD and PPD claims for this study. Accident Years 1996 through 2007 were reviewed as of each year end through December 31, 2007.

TTD indemnity benefit duration is measured by counting the dates of covered loss on payment records. A small portion of claims included overlapping dates. Each date was only counted once. In cases where the dates associated with a large payment covered numerous days, those days were included as part of duration. This could be a disputed claim settlement, for example, where the claimant is compensated after the dispute is settled. When a large payment had only a single covered day, it appeared that the claim included a negotiated lump sum settlement. We did not expand the single day to cover any imputed lost time, because there are numerous circumstances for these settlements, which might have or might not have covered lost work-time.

Each claim's dates were validated. We excluded 0.6% of the data due to these edits. This allowed us to pick up inaccuracies and typos that could distort results, such as a closure year of 2099 rather than 1999. Examples of validation logic include:

- Claim closed dates on or after injury and report dates
- Claim closed dates on or before June 30, 2008, the final date in the database
- Injury dates on or before report date
- Claims with total payments of less than \$50 were excluded, assuming they were less than one day's wages

Lump sum settlements have been included where the compensated days were listed as part of the payment. This could have been compensation for a disputed claim, for example, to cover the accumulated benefit due. When the lump sum settlement was an agreed upon amount that did not include lost days from work, the settlement was generally entered with a single day. Changes in the proportion or timing of settlements could have impact duration.

In reviewing state graphs, we were concerned with the reliability of smaller volume states' results. We used the Bootstrap method to determine credibility at a 95% level for each point in the state graphs included in this analysis. The "selected states" all have highly credible results. For the smaller volume states, duration was credible enough that the stronger trends (such as increasing duration in the late 1990s) were present at a 95% credibility level. The changes from year to year, however, were not always credible at this level.

Alternative Measures

Several alternative measures for claim duration were considered. Of these, the two alternatives that are conceptually simple are discussed below.

First, claim duration could have been estimated as the period from injury date to claim closure date. This measure produced a higher duration, in part due to the different ways that companies close claims. A claim might be left open beyond the final indemnity payment for many reasons, including that in many cases the last payment only becomes identified as such when there are no further requests for compensation. This measure also does not account for benefit gaps for intermittent return to work by some injured workers.

Second, claim duration could have been estimated as the period from date of injury to return-to-work date. Known challenges associated with this method are:

- Inclusion of worked days prior to the return-to-work date
- Exclusion of benefit days after an unsuccessful return to work, if additional payments do not trigger the claim to reopen
- Inability to include preliminary results on open claims
- The return-to-work date field is not populated in over half the claims in the study

In this study, duration is measured as compensated days of lost wages. This measurement overcomes all of the challenges associated with the two duration measures above. Counting the number of compensated days allows the measure of duration to accurately reflect lost work days, for duration to develop more consistently over time, and to include a larger percentage of reported claims.

Appendix II–Duration Related Statistics by State

Table 1 includes the waiting period and the retroactive period, the maximum TTD and PPD benefits as compared to the State Average Weekly Wage (SAWW), and the median duration. The waiting period is unpaid time after injury or illness, prior to benefits eligibility. This short unpaid period eliminates some of the moral hazard of WC by not encouraging a worker with a minor injury to stay away from work unnecessarily. In many states, once a worker has been away from the job for the listed retroactive days, the original waiting period is compensated (retroactively). The retroactive period is generally two or three weeks, after which the worker is compensated for the waiting period. A few states (indicated by "**") do not compensate for the waiting period, regardless of the length of compensated disability.

In most cases, the TTD indemnity benefits median duration is shorter when the waiting period is three or five days and longer in the states with a seven-day wait.

The maximum weekly indemnity benefits as a percentage of SAWW are shown as an additional consideration for both TTD and PPD benefits. States with no statutory maximum for PPD indemnity benefits are indicated with "**". A relatively low maximum might reduce the incentive for a worker to remain on disability when they could return to work.

	Waiting	TTD Benefits	Max TTD Benefits	Max PPD Benefits	Median Days Duration
		Retroactive		as % of	AY 2001
STATE	Period	After	as % of SAWW	SAWW	@12/31/2007
AK	3 Days	28 Days	120%	**	29
AL	3	21	100%	31%	28
AR	8	14	85%	64%	42
AZ	7	14	100%	100%	42
СО	3	14	91%	29%	40
СТ	3	7	100%	78%	28
DC	3	14	100%	100%	28
FL	7	21	100%	75%	42
GA	7	21	100%	100%	52
HI	3	**	100%	100%	14
IA	3	14	200%	184%	24
ID	5	14	90%	55%	29
IL	3	13	133%	133%	37
IN	7	21	100%	100%	36
KS	7	21	75%	75%	42
КҮ	7	14	100%	100%	42
LA	7	41	75%	**	66
MD	3	14	100%	75%	27
ME	7	14	90%	90%	42
МО	3	14	105%	55%	32
MS	5	13	67%	67%	48
MT	4	**	100%	50%	47
NC	7	21	110%	110%	52
NE	7	41	100%	100%	32
NH	3	13	150%	150%	17
NM	7	28	100%	100%	46
NV	5	5	150%	**	31
OK	3	**	100%	50%	49
OR	3	14	133%	100%	24
RI	3	**	115%	115%	38
SC	7	14	100%	100%	56
SD	7	7	100%	100%	32
TN	7	14	110%	100%	45
тх	7	14	100%	70%	94
UT	3	14	100%	67%	29
VA	7	21	100%	100%	41
VT	3	10	150%	150%	29

Table 1Benefit Provisions and Median Durations by State

	Pure TT Healing Period Combined		
State	Days	Days	Days
AK	51	232	102
AL	67	155	88
AR	60	164	92
AZ	65	210	98
СО	66	198	117
СТ	48	186	97
DC	118	401	152
FL	76	158	105
GA	177	283	202
н	32	310	111
IA	26	131	65
ID	34	159	72
IL	78	159	107
IN	50	129	70
KS	67	126	89
КҮ	71	205	100
LA	248	434	259
MD	70	238	114
ME	162	518	173
МО	55	94	72
MS	88	262	134
МТ	53	279	135
NC	207	240	216
NE	45	153	95
NH	65	365	108
NM	54	272	127
NV	50	163	86
ОК	87	230	146
OR	40	170	82
RI	99	135	109
SC	181	202	187
SD	37	110	65
TN	57	147	90
тх	69	260	174
UT	42	158	74
VA	127	293	151
VT	46	216	98

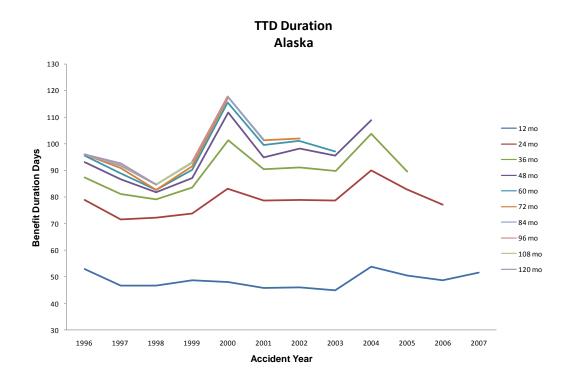
Table 2Temporary Total Indemnity Benefit Average DurationAY 2001 @ 84 Months

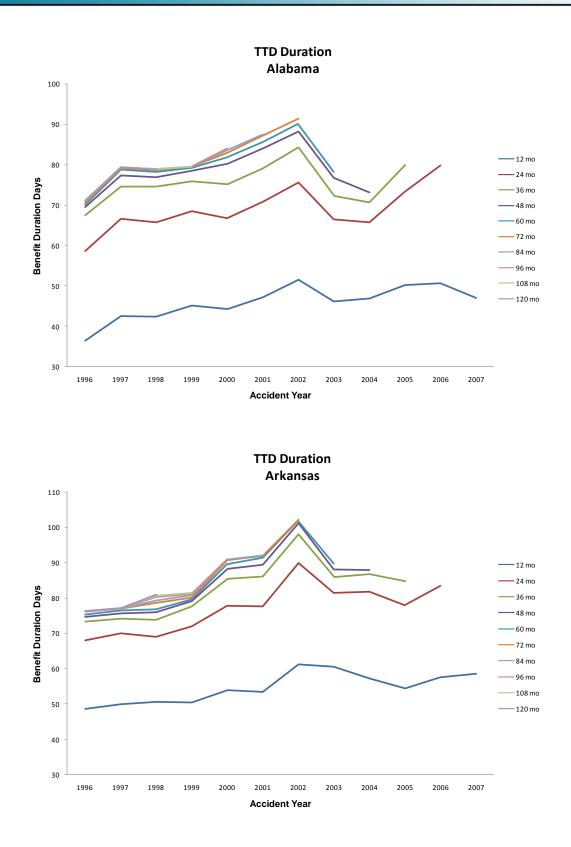
Appendix III–Other State Results

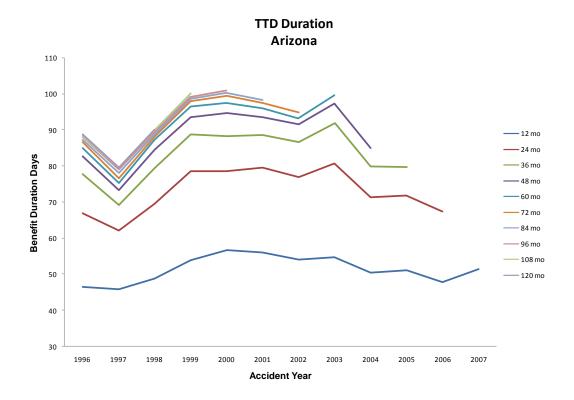
Temporary Total (TT) indemnity benefits duration graphs for the remainder of the reviewed states are included here for completeness. This set of states has fewer claims underlying the analysis, so the year-to-year changes might be more impacted by a few claims.

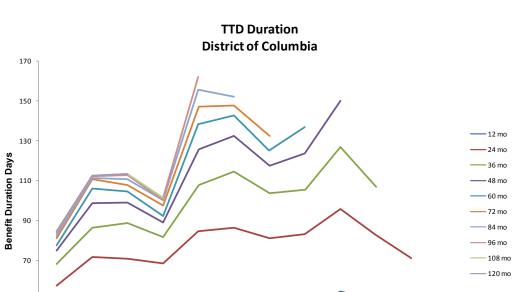
These graphs display differences in development patterns and differences in the median TTD duration. Many of these states show the countrywide pattern of increasing duration through the early 2000s. As discussed in Appendix I, we performed statistical tests to review credibility by state and concluded that, for these states, the high-level trends and general duration levels are meaningful, but the apparent changes in duration from one year to the next are not always statistically significant.

The waiting periods and retroactive periods by state are shown on Table 1 in Appendix II.

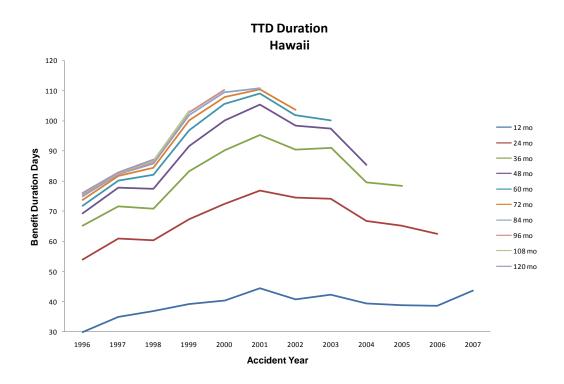




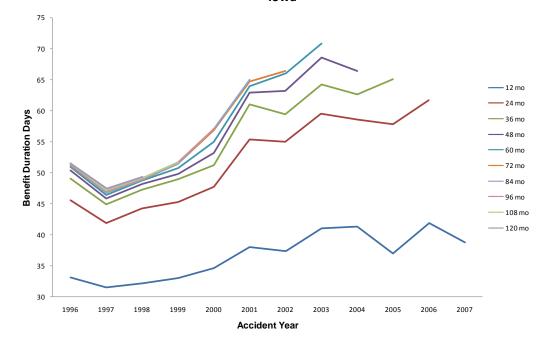


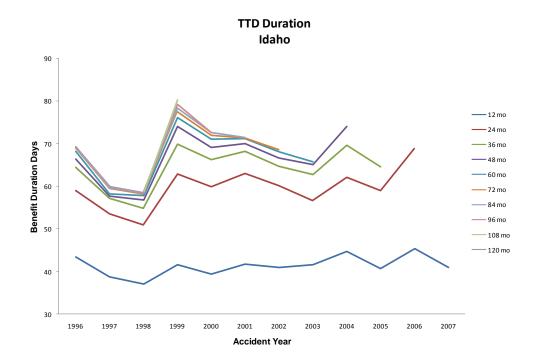


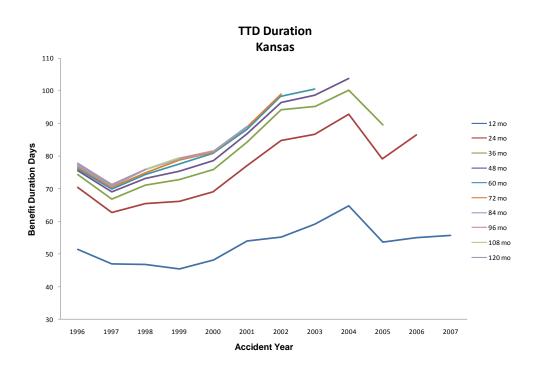
1999 2000 2001 2002 2003 2004 2005 Accident Year

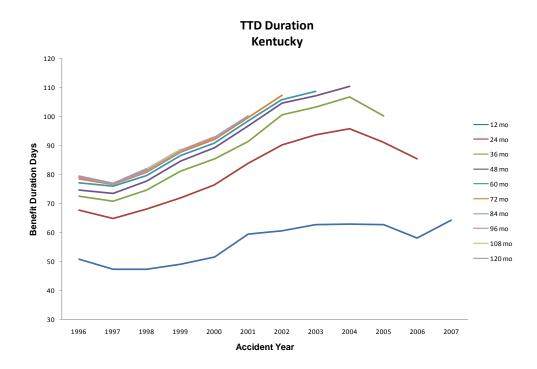


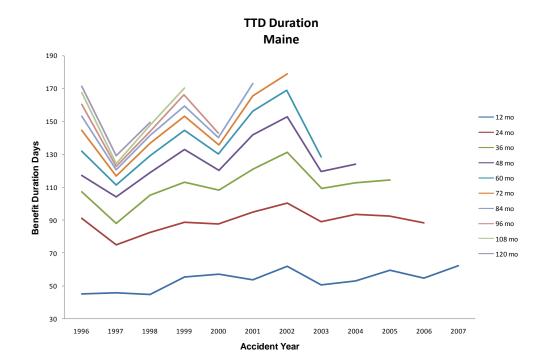


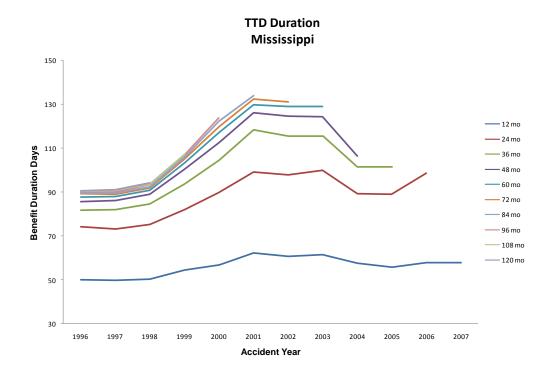


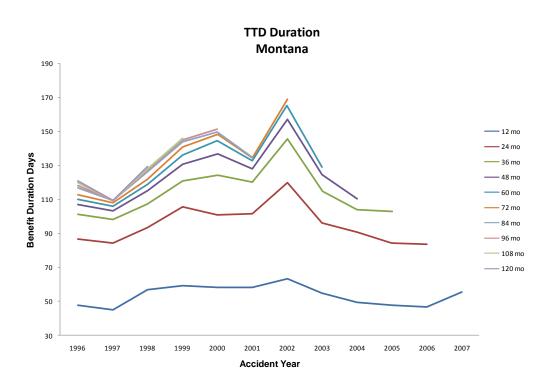


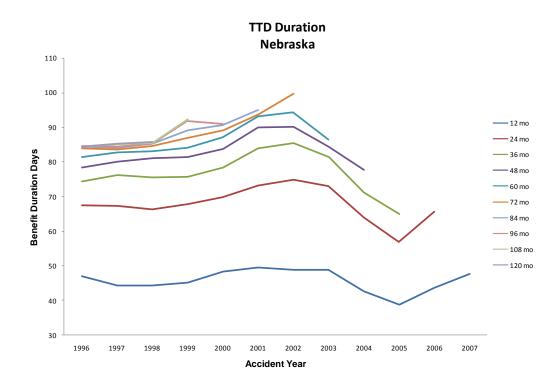


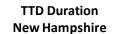


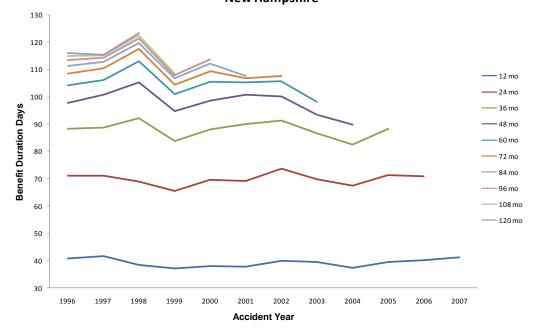


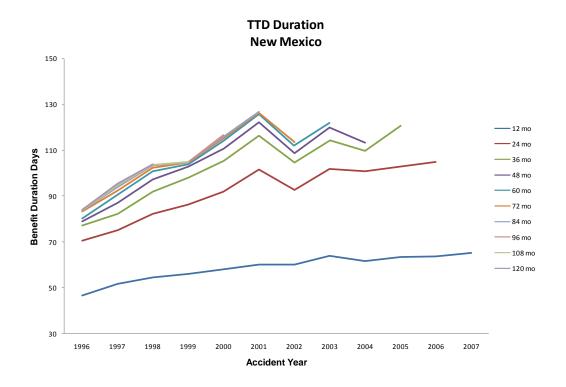




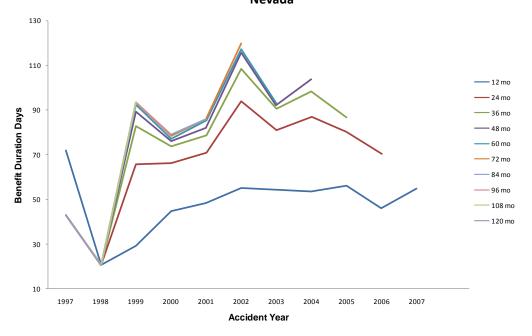


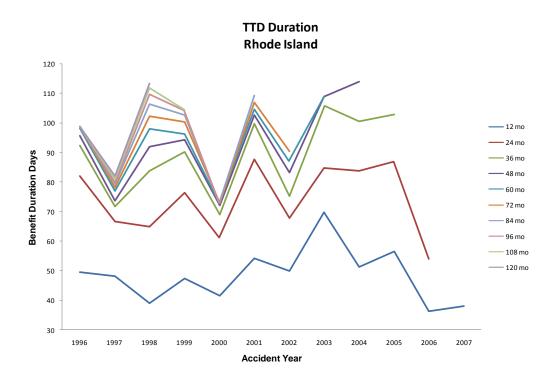




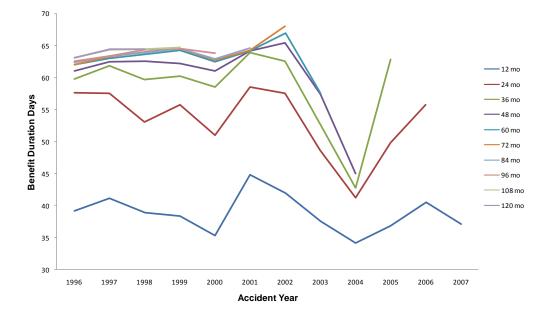


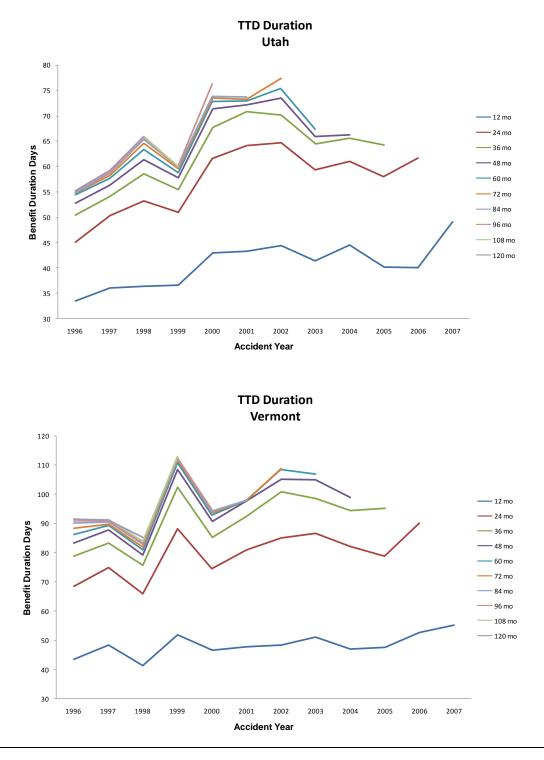






TTD Duration South Dakota





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