



February 26, 2018

Mr. Alexander Acosta
Secretary of Labor
U.S. Department of Labor
900 Constitution Avenue NW
Washington, D.C. 20210

Re: “Definition of Employer under Section 3(5) of ERISA-Association Health Plans”; RIN 1210-AB85 or Docket ID No. 2017-28103 (submitted electronically)

Dear Secretary Acosta:

As a member of the National Association of REALTORS[®], I support the proposed regulation to enable self-employed individuals to participate in Association Health Plans (AHPs). The Department of Labor’s effort is a promising step to providing more affordable insurance options as health care costs continue to rise while choices for coverage are steadily shrinking.

While most Americans get their health coverage through an employer, real estate agents are independent contractors, not employees of their local real estate brokerage. As a result, self-employed professionals are forced to purchase insurance in the more volatile individual insurance market, which tends to offer fewer choices at much higher costs. I am a healthy adult, yet my insurance premium is 400% more than it was five years ago. I am paying \$8,000 per year in premiums, and still paying all costs out of pocket, as my deductible is nearly \$7,000. This adds up to more than a third of my AGI. Something has to change!

The rule proposes to provide more affordable choices for independent contractors by modifying the definition of “employer” to include “working owners.” This is essential to enabling real estate professionals and their families to participate in an AHP in the large group market. The large group market typically offers more flexibility in insurance plan design and improved negotiating power to bargain for lower premiums – benefits that are key to driving down health care costs. The proposed rule would also protect consumers enrolling in these plans by prohibiting discrimination based on health status.

I urge you to finalize the proposed rule with these comments in mind. Thank you for the opportunity to weigh in on this important issue.

Sincerely,

Linda L Crouse

Linda Crouse • Associate Broker, ABR, CRS, GRI, ePRO

RE/MAX Lakeshore Grand Haven • 1014 S Beacon Blvd • Grand Haven, MI 49417

Cell: 616-402-3535 • Linda@BuyTheLakeshore.com • www.BuyTheLakeshore.com • www.LindaCrouse.com