



19 Community Drive • Augusta, Maine 04330 • (207) 622-7501 • Fax: (207) 623-3590

March 2, 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® and President of the Maine 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 good step to providing more affordable insurance options as health care costs rise and choices for coverage are 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.

The rule proposes to provide 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.

I also encourage the Department to reconsider the provision preventing working owners from participating in an AHP if they are eligible to participate in an employer health plan. Coverage through a spouse's employer may not be the most affordable option for a family. Eliminating this requirement will provide additional insurance choices for many real estate professionals and their families.

The need for affordable health insurance options remains a top concern among practicing real estate professionals. Allowing working owners to participate in AHPs while removing unnecessary limits could expand access to more affordable health care options for many more families.

Thank you for the opportunity to weigh in on this important matter.

Sincerely,
Kim Gleason
2018 Maine Association of REALTORS® President
Owner/Broker McAllister Real Estate, Hallowell



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