

To Whom It May Concern:

Stride Health makes software to help the millions of people who work for themselves be more productive and successful.

We are writing to submit comments in regards to the Department of Labor's proposed rule regarding the definition of employer under Section 3(5) of ERISA as it relates to association health plans. Should the proposed rule move forward, the Department should ensure it is doing so in a way which expands access to affordable, quality healthcare options for all Americans.

As technology continues to change the nature of work and re-shape the workplace, and our careers in it, it is imperative that this rule should empower people who work for themselves, irrespective of their specific profession, industry, or the number of hours worked, with the opportunity to access insurance plan options offered by a trade or business association.

As written, having individuals identify with a single profession or job does not accurately represent today's self-employed workforce, many of whom earn income through multiple jobs or are in the process of starting businesses.

More than sixty million Americans are self-employed, and even more earn secondary incomes working for themselves. The rise of technology-enabled marketplaces for services and products has democratized more access to customers for people who work for themselves, but the phenomenon of working for yourself is nothing new. The American workforce has always relied on self-employed small business owners who are plumbers, photographers, dog walkers, landscapers, drivers, chefs and graphic designers. Regardless of what they consider themselves or how they are incorporated, regulated or licensed, these individuals each work as a business of one.

Many part-time retail and hospitality workers are businesses of one, as well. Whether they work for small or large businesses, there are many Americans who are not eligible for employee benefits, and need better access to affordable, quality health care.

According to the recent study *Freelancing in America: 2017*, more than 19 million people who work for themselves can be considered "diversified workers" and more than three million are "temporary workers". Only six percent consider themselves "freelance business owners."

Together, these are all American entrepreneurs. They come in different shapes and sizes, and their craft spans a variety of professions. Some work for themselves as a means of supplemental earnings, and many have multiple income streams, making it challenging to define themselves by a single profession. From a practical perspective, defining people by a profession might be challenging and stymie, rather than ease, access to health insurance. This is particularly true for many Americans with multiple income streams. This could prove even more challenging to Americans starting their own businesses. Many people find supplemental income while starting businesses until their businesses can provide a meaningful income. That's true for everyone from a technology entrepreneur starting a company with limited capital to entrepreneurs selling crafts in markets to aspiring chefs setting up shop at the weekend farmers markets. According to *Freelancing in America: 2017*, "Almost five million individuals currently freelancing part-time are thinking about making the leap to independence."

Requiring people to classify themselves by a single profession could prevent many Americans from starting businesses which would contribute to their communities and the American economy. We also believe that defining entrepreneurs by the number of hours they work, weekly or monthly, in a given profession or industry, might have similar effects.

Today, we partner with the world's largest on-demand labor platforms, seller marketplaces and companies, to make it easier for independent working Americans to find and enroll in the health insurance that is right for them. Stride is proud to help the millions of Americans who work for themselves access the benefits and tools they need to be economically secure.

Thank you for your consideration.