

The Honorable Michael Tipping, Chair  
The Honorable Amy Roeder, Chair  
Committee on Labor  
Maine State Legislature

April 23, 2025

**Re: LD 1333 – Technical Amendments to the Maine PFML Benefits Program – SUPPORT**

Dear Senator Tipping, Representative Roeder, and Distinguished Committee Members:

On behalf of the American Council of Life Insurers (ACLI), thank you for the opportunity to provide comments in support of LD 1333, which would make technical amendments to improve Maine’s paid family and medical leave benefits program. The bill would ensure fair and adequate funding of the state’s administrative functions relating to the oversight of private PFML plans offered alongside the state-run PFML program.

ACLI supports **section 14 of the bill** relating to the total fees that may be charged to employers that offer private PFML plans. ACLI recognizes that the Maine Department of Labor must account for the costs of administering the important private PFML plan option. However, this section would impose a cap on the total amount of administrative fees that may be charged to an employer each year, with a lower cap for small employers with fewer than 50 employees. The current open-ended assessment would create uncertainty for employers, making it difficult for them to budget to meet their annual PFML obligations. It would also create instability for the state program if employers were forced to shift their employees onto the state plan if the fee were to become too burdensome. Additionally, this section would add a reporting requirement to increase transparency and provide policymakers with a more complete picture of the costs of administering the program.

ACLI also supports **section 16 of the bill**, which would provide that the PFML program’s job protections do not apply to an employee who is absent from work for more than five days without providing notice to their employer. By increasing the incentive for timely notification, this section would balance the difficulty an employee may face when circumstances prevent them from immediately notifying their employer about an absence with the planning and temporary coverage challenges faced by their employer.

**American Council of Life Insurers** | 101 Constitution Ave, NW, Suite 700 | Washington, DC 20001-2133

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The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI’s member companies are dedicated to protecting consumers’ financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI’s 280 member companies represent 94 percent of industry assets in the United States.

We respectfully urge the Committee to support LD 1333. Please don't hesitate to contact me if you have questions.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a horizontal line.

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