

Department of State, Office of Information and Regulatory Affairs, Office of Management and Budget
Department of State's Bureau of Consular Affairs, Office of Visa Services
Docket Number: DOS-2019-0039

Re: Emergency Submission Comment on Immigrant Health Insurance Coverage

October 31, 2019

To whom it may concern:

The undersigned organizations write in response to the Emergency Submission Comment on Immigrant Health Insurance Coverage. This 48-hour comment period—and the entire underlying proclamation—is not an emergency. This is just the latest brick in your administration's "invisible wall" that puts an extremist racial and political agenda ahead of the nation's interests and the law of the land.

We support a nation where all are truly equal, immigration is recognized as a strength, and individuals have access to the essentials of life without regard to where they were born. As part of this vision, we support access to comprehensive, affordable health care—and efforts to strengthen and protect the hospitals, community health centers, and providers who work tirelessly to deliver high quality care to their patients. Unfortunately, due largely to the policies of this administration, the number of people in the United States without health insurance increased last year for the first time in more than a decade.

We specifically oppose the collection of information on health insurance status as proposed in this Emergency Submission Comment. In fact, we strongly oppose the underlying October 4, 2019 proclamation mandating that visa applicants abroad buy health insurance. This proclamation is not about improving access to health care or making sure hospitals are paid. Instead, it serves as yet another constraint on legal immigration, imposing a wealth test that will disproportionately harm people of color. Like the Muslim ban or the public charge regulation, it sends one message: if you're not white and wealthy, you're not welcome here.

The proclamation actually threatens to undermine the nation's health. It restricts immigrants' ability to purchase comprehensive health insurance available through the Affordable Care Act (ACA) marketplaces. Congress elected to make lawfully residing immigrants eligible for subsidized marketplace coverage because doing so advances the health of our nation. The proclamation puts the nation's health at risk by ignoring Congress and instead requiring individuals to buy costly and less comprehensive health coverage.

Notably, the proclamation allows short-term plans, which do not comply with the Affordable Care Act's consumer protections, to qualify as "acceptable" coverage. Frequently referred to as "junk plans," short-term plans lack comprehensive coverage and can be prohibitively expensive for individuals with pre-existing conditions. This isn't promoting health insurance—this is putting a barrier between individuals and the coverage for which they are eligible. In fact, forcing immigrants to avoid comprehensive insurance could increase uncompensated care costs for providers, when patients can't afford needed health care that is not covered by these bare-bones plans.

There is still time to protect the nation's health before the proclamation goes into effect. We call on you to rescind this proclamation before it goes into effect.

Sincerely,

Access Living
Action Together Walpole
ADAPT Montana
Advocates for Basic Legal Equality, Inc.
Advocates for Youth
African Communities Together
African Services Committee
AIDS Foundation of Chicago
Alabama Arise
Alameda Health Consortium
Alliance for African Assistance
American Federation of Teachers
API Chaya
APLA Health
AR Hunger Relief Alliance
Arab American Association of NY
Arizona Coalition to End Sexual and Domestic Violence
Asian & Pacific Islander American Health Forum
Asian American Federation (AAF)
Asian American Legal Defense and Education Fund (AALDEF)
Asian Americans Advancing Justice - LA
Asian Americans Advancing Justice | Chicago
Asian Americans Advancing Justice| AAJC
Asian Health Services
Asian Law Alliance
Asian Pacific American Labor Alliance, AFL-CIO
Asian Pacific Institute on Gender-Based Violence
Asian Pacific Policy and Planning Council
Asian Services In Action, Inc. (ASIA, Inc.)
Association for Community Living in Boulder & Broomfield Counties
Association of Asian Pacific Community Health Organizations (AAPCHO)
Association Of Moroccan Immigrant Network (A.M.I.N)
Association of Nurses in AIDS Care
Austin Region Justice for Our Neighbors
Autistic Self Advocacy Network
Bay Area Regional Health Inequities Initiative
Bellingham Deaf and Disability Justice Collective
Berkeley Journal of Employment and Labor Law
Berkshire Immigrant Center
BIDMC Immigration Advocacy Team
BiNet USA
Black Alliance for Just Immigration (BAJI)
Bread for the World
BronxCare Hospital/Mt. Sinai Hospital
Brooklyn Defender Services
Cabrini Immigrant Services of NYC
California Alliance for Retired Americans
California Association of Food Banks

California Food Policy Advocates
California Immigrant Policy Center
California Pan-Ethnic Health Network
California Partnership to End Domestic Violence
California Primary Care Association
California Reinvestment Coalition
California Teachers Association
Californians Together
Campaign for New York Health
Cape Cod Coalition for Safe Communities
Caritas of Waco
Catholic Charities
Catholic Charities Diocese of Monterey
Catholic Charities Hawaii
Center Against Sexual & Domestic Abuse, Inc.
Center for Health Policy and Law at Northeastern University School of Law
Center for Health Progress
Center for Independence of the Disabled, NY
Center for Law and Social Policy (CLASP)
Center for Public Policy Priorities
Center for Reproductive Rights
Center for the Study of Social Policy
CenterLink: The Community of LGBT Centers
Central American Resource Center of California (CARECEN LA)
Centro Latino Americano
Changing The Future Outcome
Charlotte Center for Legal Advocacy
Chhaya Community Development Organization
Chicago Alliance Against Sexual Exploitation
Child Care Law Center
Children First for Oregon
Children's Defense Fund - Texas
Children's Defense Fund-New York
Children's HealthWatch
Chinese American Planning Council
Chinese for Affirmative Action
Chinese-American Planning Council
Christian Reformed Church Office of Social Justice
Church World Service
Citizen Action of Wisconsin
City of Tucson, Arizona
Clinicians for Progressive Care
Coalition Ending Gender-Based Violence
Coalition for Asian American Children and Families
Coalition for Disability Health Equity
Colorado Cross-Disability Coalition
Colorado Developmental Disabilities Council
Colorado Fiscal Institute
Colorado Foundation for Universal Health Care
Columbia Legal Services

Community Action Board of Santa Cruz County, Inc.
Community Action Marin
Community Action Partnership of SLO County
Community Catalyst
Community Clinic Association of Los Angeles County
Community Clinic Consortium of Contra Costa and Solano
Community Growth Center
Community Health Care Association of New York State (CHCANYS)
Community Healthcare Network
Community Legal Aid Society Inc.
Community Resource Center
Compass Family Services
Connecticut Institute for Refugees and Immigrants
Connecticut Oral Health Initiative, Inc.
Council for Global Equality
Council on American-Islamic Relations, San Diego Office
CRLA Foundation
CT Shoreline Indivisible
Daya inc
Dayle McIntosh Center
DC-MD Justice For Our Neighbors
Detroit Disability Power
Disability Community Resource Center, Inc.
Disability Rights Education & Defense Fund
Disability Rights Pennsylvania
Disciples Refugee & Immigration Ministries
Doctors for America
DQIA: disabled queers in ACTION!
Education and Leadership Foundation
El Centro, Inc.
Emerald Isle Immigration Center
Empire Justice Center
Empower Missouri
Empowering Pacific Islander Communities (EPIC)
End Domestic Abuse Wisconsin: The Wisconsin Coalition Against Domestic Violence
Entre Hermanos
Equality California
Equality North Carolina
EverThrive Illinois
Fair Immigration Reform Movement (FIRM)
Faith Action Network
Families Belong Together
Families USA
Family Advocates, Inc.
Family Equality
Family Voices of Tennessee
Feeding Texas
First 5 Marin Children and Families Commission
First Focus Campaign for Children
First Parish Immigration Justice Task Force

Florida Health Justice Project
Florida Impact to End Hunger
Florida Policy Institute
Food for People, the Food Bank for Humboldt County
Food Research & Action Center
Freedom Network USA
Gay Men's Health Crisis (GMHC)
Georgia ADAPT
Georgians for a Healthy Future
GirlForward
Greater Philadelphia Coalition Against Hunger
Guadalupe Centers High School
Gulfcoast Legal Services, Inc.
Guttmacher Institute
Hand in Hand: The Domestic Employers Network
Health & Medicine Policy Research Group
Health Care For All
Health Care for All New York
Health Care for America Now (HCAN)
Health Law Advocates
Healthy House Within A MATCH Coalition
Heartland Alliance
Heights Friends of Immigrants
HIAS Pennsylvania
Hispanic Federation
Hispanic Health Council
Homeless and Housing Coalition of Kentucky
Housing Action Illinois
Houston Immigration Legal Services Collaborative
Hunger Free Vermont
Idaho Voices for Children
Illinois Coalition Against Domestic Violence
Illinois Coalition for Immigrant and Refugee Rights
Immigrant and Refugee Community Organization
Immigrant Connection
Immigrant Law Center of Minnesota
Immigrant Legal Advocacy Project
Immigrant Legal Resource Center
Immigrant Rights Action
Immigrants Contribute
Immigration Justice Task Force - First Parish in Concord
In Our Own Voice: National Black Women's Reproductive Justice Agenda
Indiana Coalition for Human Services
Indivisible Eastside -WA
Interfaith Anti Bias Task Force
International Community Health Services
InterReligious Task Force on Central America and Colombia (IRTF Cleveland)
Iowa Coalition Against Domestic Violence (ICADV)
Irish International Immigrant Center
Japanese American Social Services, Inc.

Jefferson County Immigrant Rights Advocates
Jewish Family & Children's Service
Jewish Family Service of Los Angeles
Jewish Vocational Service, Boston
Jubilee Immigration Advocates
Just Harvest
Justice Center of Southeast MA
Justice for Our Neighbors Michigan
Justice in Aging
Kentucky Equal Justice Center
Kentucky Voices for Health
KIAC Kitsap Immigrant Assistance Center Bremerton, WA
Kids for College
Korean American Family Services (KFAM)
Korean Community Center of the East Bay
Korean Community Services of Metropolitan NY Inc.
La Casa Norte
La Clinica de La Raza
La Union del Pueblo Entero
Lana'i Community Health Center
Latino Coalition for a Healthy California
Law Foundation of Silicon Valley
LeadingAge
Legal Aid Society of San Mateo County
Legal Council for Health Justice
Lenox Hill Neighborhood House
Linda Vista United Methodist Church
Literacy Volunteers Winchester Area
Long Island Activists
Long Island Inclusive Communities Against Hate
Long Island Language Advocates Coalition
Los Angeles Christian Health Centers
Lutheran Social Services of New York
Make the Road New York
Maryland Citizens' Health Initiative Education Fund Inc.
Maryland Hunger Solutions
Massachusetts Immigrant and Refugee Advocacy Coalition
Massachusetts Law Reform Institute
Maternal and Child Health Access
Maxwell Street Legal Clinic
McLennan County Hunger Coalition
Metro New York Health Care for All
MI Disability Rights Coalition
Mi Familia Vota
Michigan Coalition to End Domestic & Sexual Violence
Michigan Immigrant Rights Center
Michigan League for Public Policy
Migrant and Immigrant Community Action Project
MinKwon Center for Community Action
Minnesota Budget Project

Mississippi Center for Justice
Missouri Kansas AILA Chapter Member
MLPBprimary
Modern Military Association of America
MomsRising
Montana Primary Care Association
Muslim Public Affairs Council (MPAC)
NASTAD
National Asian Pacific American Women's Forum
National Asian Pacific Center on Aging (NAPCA)
National Association for the Education of Young Children (NAEYC)
National Association of Pediatric Nurse Practitioners
National Association of Social Workers
National Center for Law and Economic Justice
National Center for Transgender Equality
National Coalition Against Domestic Violence
National Coalition for the Homeless
National Consumer Law Center
National Council of Jewish Women
National Employment Law Project
National Hispanic Council on Aging
National Immigrant Justice Center
National Immigration Law Center
National Justice for Our Neighbors
National Latina Institute for Reproductive Health
National LGBTQ Task Force
National Low Income Housing Coalition
National Partnership for Women & Families
National WIC Association
National Women's Law Center
NC Child
Nebraska Appleseed
Nebraska Coalition to End Sexual and Domestic Violence
NETWORK Lobby for Catholic Social Justice
New Mexico Center on Law and Poverty
New York Immigration Coalition
New York Justice for Our Neighbors
New York Legal Assistance Group
NM Voices for Children
North Carolina Justice Center
North County Immigrant Task Force
North East Medi-Cal Services (NEMS)
North Suburban Legal Aid Clinic
Northwest Harvest
Northwest Health Health and Human Rights
Northwest Health Law Advocates
NYC Coalition to Dismantle Racism in the Health System
NYCD16 Indivisible
Oasis Legal Services
Ohio Domestic Violence Network

Oklahoma Policy Institute
OneAmerica
Opening Doors International Services, Inc.
Operation Access
Oregon Food Bank
Pacific Asian Counseling Services
Pan Asian Volunteer Health Clinic
Parent Possible
Partnership for America's Children
Pax Christi Illinois
Pennsylvania Immigration and Citizenship Coalition
PFLAG National
Physicians for a National Health Program - NY Metro
Placer Independent Resource Services
Planned Parenthood Affiliates of California
Planned Parenthood Federation of America
Positive Women's Network-USA
Presentation Sisters at Caminando Juntos
Prevention Institute
Progressive Doctors
Project IRENE
Protect Our Care Illinois Coalition
Public Health Justice Collective
Public Justice Center
Rainbow House Domestic Abuse Services, Inc.
RefugeeOne
RESULTS
Robert F. Kennedy Human Rights
Rosie's Place
Safe Horizon Immigration Law Project
SAGE
San Diego Immigrant Rights Consortium
San Francisco Latino Democratic Club
Sauti Yetu Center for African Women and Families
Seattle/King County Coalition on Homelessness
SEIU
Services, Immigrant Rights & Education Network (SIREN)
Sexuality Information and Education Council of the United States (SIECUS)
Show Up Long Island
Shriver Center on Poverty Law
Silver State Equality-Nevada
Snohomish Immigration Advocacy
Social Justice Task Force, San Mateo County Democracy for America
Solano County Supervisor District 2
South Asian Fund For Education, Scholarship and Training (SAFEST)
South Asian Network
South Bronx United
South Carolina Appleseed Legal Justice Center
Southeast Asia Resource Action Center (SEARAC)
Southern Poverty Law Center

Southwest Center for Independence
St. Paul Community Literacy Consortium
Statewide Poverty Action Network
Student National Medical Association (SNMA)
SYL Foundation
TakeAction Minnesota
Tennessee Justice Center
The Achievable Foundation
The Black Women's Health Imperative
The Children's Partnership
The Coelho Center for Disability Law, Policy and Innovation
The Fenway Institute
The Inland Empire Immigrant Youth Collective
The Leadership Conference on Civil and Human Rights
The Legal Aid Society
The Right to Immigration Institute
Tiburcio Vasquez Health Center, Inc.
Together We Will Long Island
Treatment Action Group (TAG)
Ujima Inc.: The National Center on Violence Against Women in the Black Community
UnidosUS
Union for Reform Judaism
Union of North American Vietnamese Student Associations
United African Organization
United Cambodian Community
Unity Health Care
Universal Health Care Action Network
Universal Health Care Foundation of Connecticut
University YMCA New American Welcome Center
UPLAN (United Parent Leaders Action Network)
Utahns Against Hunger
UURISE - Unitarian Universalist Refugee and Immigrant Services and Education
Valley Settlement
Vermont Affordable Housing Coalition
Vermont Legal Aid
Vermont Network Against Domestic and Sexual Violence
Violence Free Colorado
Violence Free Minnesota
Virginia Garcia Memorial Health Center
Wallingford Indivisible
Washington State Coalition Against Domestic Violence (WSCADV)
Wayne Action for Racial Equality
We Are One, Inc. - www.WeAreOne.cc - WAO
WeCount!
Welcome Project Inc
West Valley Neighborhoods Coalition
West Virginians for Affordable Health Care
West Virginians Together for Medicaid
Western Center on Law & Poverty
Whitman-Walker Health

Wisconsin Faith Voices for Justice
World Relief
WV FREE
YWCA Pierce County