



October 31, 2019

The Honorable Edward J. Ramotowski
Deputy Assistant Secretary for Visa Services
Bureau of Consular Affairs
U.S. Department of State
2201 C Street, N.W.
Washington, DC 20520

RE: Notice of Information Collection Under OMB Emergency Review: Immigrant Health Insurance Coverage

Dear Deputy Assistant Secretary Ramotowski:

The American College of Physicians (ACP) is writing in response to the Notice of Information Collection under OMB Emergency Review: Immigrant Health Insurance Coverage (Docket No. DOS-2019-0039). ACP is the largest medical specialty organization and the second-largest physician group in the United States. ACP members include 159,000 internal medicine physicians (internists), related subspecialists, and medical students. Internal medicine physicians are specialists who apply scientific knowledge and clinical expertise to the diagnosis, treatment, and compassionate care of adults across the spectrum from health to complex illness.

We strongly oppose the collection of information on health insurance status as proposed in this notice and the underlying October 4, 2019 Presidential Proclamation, Suspension of Entry of Immigrants Who Will Financially Burden the United States Healthcare System. The proclamation requires immigrants to demonstrate that they will be covered by approved health insurance within 30 days of entry into the U.S. or that they have financial resources to pay for “reasonably foreseeable medical costs.”

Under the proclamation, approved health insurance would include employer-sponsored and other private coverage, including unsubsidized coverage through the Affordable Care Act (ACA) Marketplaces, short-term, traveler, or catastrophic plans. Medicaid coverage for adults and federally subsidized ACA Marketplace plans would not be considered approved coverage. The proclamation restricts immigrants’ ability to purchase comprehensive health insurance available through the ACA marketplaces and instead requires them to obtain costly and potentially less comprehensive health coverage, such as short-term plans, in order to qualify as “acceptable” coverage.

Short-term plans lack comprehensive coverage and can be prohibitively expensive for individuals with pre-existing conditions. Because they were meant to be used for a limited time period, the plans are not required to meet many of the patient protections required by standard insurance regulations and known to improve health outcomes. Plans that are not required to cover essential health benefits; not required to cover people with pre-existing health conditions; and that may place annual or lifetime limits on coverage, are not providing the same access to care that comprehensive health insurance does.

The proclamation will also make it more difficult for lower-income immigrants to enter the U.S. According to the Migration Policy Institute, the proclamation may render two-thirds of applicants for immigrant visas ineligible. In addition, fear and confusion surrounding this proclamation and other immigration policy changes may deter immigrants who are lawfully present from enrolling in programs they are eligible for.

In our 2011 paper, National Immigration Policy and Access to Health Care, ACP called for a national immigration policy on health care that balances the needs of the country to control its borders, provides access to health care equitably and appropriately, and protects the public's health. ACP believes that national immigration policy should differentiate treatment of persons who fully comply with the law in establishing legal residency from that of persons who break the law in the determination of access to subsidized health coverage and treatment. At the same time, national immigration policies should ensure that all residents of the United States, without regard to their legal residency status, have access to medical care, especially for primary and preventive care and vaccinations against communicable diseases. The proclamation would impede access to health related benefits for immigrants and would not only have negative consequences for the impacted individuals and their families but also their communities.

We urge you to rescind this proclamation before it goes into effect. If you have any questions, please contact Renee Butkus, Director Health Policy at rbutkus@acponline.org.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert McLean".

Robert McLean, MD, FACP
President