

EXHIBIT 16



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October 31, 2019

Department of State Desk Officer
 Office of Information and Regulatory Affairs
 Office of Management and Budget
 725 17th Street, NW
 Washington, DC 20503

Office of Visa Services
 Bureau of Consular Affairs
 Department of State
 2201 C St., NW
 Washington, DC 20520

**Re: Docket # DOS-2019-0039; Public Notice 10934 – Notice of Information Collection Under OMB
 Emergency Review: Immigrant Health Insurance Coverage**
(Submitted via www.regulations.gov; oira_submission@omb.eop.gov; PRA_BurdenComments@state.gov)

Dear Officers:

On behalf of more than 9,000 pediatric nurse practitioners (PNPs) and pediatric-focused advanced practice registered nurses (APRNs) committed to providing optimal health care to children, the National Association of Pediatric Nurse Practitioners (NAPNAP) appreciates the opportunity to provide its comments in response to the October 30, 2019 notice of information collection (Docket # DOS-2019-0039; Public Notice 10934 – Notice of Information Collection Under OMB Emergency Review: Immigrant Health Insurance Coverage; 84 Fed. Reg. 210; pp. 58199-58200) requesting review and approval of information collection on immigrant health insurance coverage in accordance with the emergency review procedures of the Paperwork Reduction Act of 1995. NAPNAP strongly objects to the use of these procedures, permitting only a 48-hour comment period, for an administrative action that is clearly not an emergency, and for rushing to implement a policy that would cause significant harm to immigrant children and their families.

Pediatric nurse practitioners (PNPs) and fellow pediatric-focused advanced practice registered nurses (APRNs) are committed to providing optimal health care to children in primary, specialty and acute care settings. APRNs who concentrate on children's care, including PNPs, have attained enhanced education in pediatric nursing and health care using evidence-based practice guidelines. They have provided quality, accessible, affordable healthcare to children and families for more than 50 years in an extensive range of community practice settings including pediatric offices, clinics, schools, and hospitals. Practicing in primary care, specialty, and acute care, they diagnose illnesses, prescribe medications and are fully qualified to provide both primary and acute healthcare services to children in a trauma-informed, culturally responsive, evidence-based manner. They are often the front-line health care providers treating immigrant children who, due to the physical and emotional hardships they have endured, are in need of significant and often prolonged medical and mental health care.

NAPNAP and its members are committed to ensuring that all children have access to comprehensive health care, without regard to where they were born. We honor that commitment by providing essential services in the hospitals, community health centers, and pediatric offices that care for those children. Based on that commitment, we strongly oppose the collection of information on health insurance status as proposed in this emergency submission and in the underlying Presidential Proclamation (PP 9945) it seeks to implement without adequate analysis of its impact. We are concerned that the proclamation threatens to undermine the nation's health, restricting the ability of immigrant children and their families to purchase comprehensive health insurance available through Affordable Care Act marketplaces even though Congress acted to make lawfully residing immigrants eligible for subsidized marketplace coverage because doing so advances the health of our nation. The proclamation also allows short-term plans, which do not comply with the Affordable Care Act's consumer protections, to qualify as "acceptable" coverage. These short-term plans lack comprehensive coverage, particularly when it comes to the services children need, and they often fail to provide access to qualified pediatric providers such as APRNs focused on children's care. They can also be prohibitively expensive for individuals with pre-existing conditions. Forcing immigrant families to choose less comprehensive coverage could increase uncompensated care costs for providers, when patients can't afford needed health care that is not covered by these limited plans.

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In summary, NAPNAP is extremely disappointed that the administration has chosen to attempt to impose such a needlessly burdensome requirement on immigrant families and children – and to attempt to do so without allowing the appropriate time for experts and stakeholders to analyze the proposal and assess its impact on vulnerable populations and the health care professional who serve them. We believe the only appropriate solution is for the administration to immediately rescind this proclamation before it goes into effect and to follow the appropriate administrative and regulatory procedures before it considers proposing a policy that would have such seriously harmful effects on the health of immigrant children and families.

Sincerely,

A handwritten signature in black ink that reads "Rajashree Koppolu". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Rajashree Koppolu, RN, MSN, CPNP-PC/AC, MSL
President