

EXHIBIT 21



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:

On behalf of the Oregon Primary Care Association (OPCA), we respectfully request that the proposed rule be immediately withdrawn. OPCA is a non-profit organization, with a mission to support Oregon's 32 community health centers, also known as federally qualified health centers, in leading the transformation of primary care to achieve health equity for all. Community health centers deliver integrated primary care, including dental and behavioral health services, to over **430,000 Oregonians annually**. Community health centers are providers within the CCO networks, providing care to some of Oregon's most vulnerable populations, including **one in four Oregon Health Plan (Medicaid) members**.

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 community health centers and providers who work tirelessly to deliver high quality care to their patients.

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.

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,

A handwritten signature in black ink that reads "M. E. Carty".

Marty Carty
Policy Manager