

EXHIBIT 11



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October 31, 2019

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: Docket Number: DOS-2019-0039
Notice of Information Collection Under OMB Emergency Review:
Immigrant Health Insurance Coverage

October 31, 2019

To whom it may concern:

Disability Rights California (DRC) writes to express strong opposition to the *"The Presidential Proclamation on the Suspension of Entry of Immigrants Who Will Financially Burden the United States Healthcare System"* ("PP 9945"). We also oppose the 48-hour comment period for this proclamation which does not provide adequate time for interested parties to comment.

DRC is the designated protection and advocacy agency for California, mandated to advance the civil rights of Californians with disabilities. Since 1978, DRC has provided critical advocacy services for people with disabilities and last year alone responded to advocacy requests from nearly 26,000 Californians with disabilities. Our legal work includes individual and impact litigation, direct advocacy services, outreach and training, and investigations of abuse and neglect. DRC protects and advocates for the rights of all Californians with disabilities, regardless of their ethnicity, cultural background, language or immigration status. DRC advocates on

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behalf of individuals who will be negatively impacted by the proposed proclamation.

We specifically oppose the collection of information on health insurance status as proposed in this Emergency Submission Comment as well as the underlying October 4, 2019 proclamation mandating that visa applicants abroad buy health insurance. This proclamation will not improve access to health care or ensure payments to hospitals. Rather it is yet another constraint on legal immigration, one which will disproportionately harm people with disabilities and 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 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. Forcing immigrants, particularly those with disabilities, to avoid comprehensive insurance will increase uncompensated care costs for providers, when patients can't afford needed health care that is not covered by these inadequate plans.

We strongly urge you to withdraw this proclamation.

Sincerely,



Catherine Blakemore
Executive Director