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October 31, 2019

BY ELECTRONIC DELIVERY

Department of State Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget (OMB)

and

Office of Visa Services
Bureau of Consular Affairs
Department of State

**RE: DS-5541 Information Collection: Immigrant Health Insurance Coverage
(Emergency Submission) DOS-2019-0039**

To whom it may concern:

The staff at Connect for Health Colorado (C4HCO), the state-based health insurance marketplace (SBM) for Colorado, appreciate the opportunity to comment on the Immigrant Health Insurance Coverage Notice of Information Collection.

While we applaud the Department of State's support encouraging all non-citizens to enroll in health coverage, we firmly believe that the directive requiring all qualified non-citizens to have coverage, along with the recent changes to the Public Charge rule, create, at best, an environment of confusion, and, at worst, promote a culture of fear and uncertainty. This new proclamation requires coverage for a public benefit, while the Public Charge rule penalizes individuals for seeking benefits. The contradictory directives by the Administration leaves Coloradans in a precarious situation.

New immigrants are a vulnerable population. While C4HCO and many others are working to lower the cost of health coverage in Colorado, affordability is still a significant barrier to accessing coverage for some.

We strongly encourage the Administration to consider all the barriers this proposed directive puts in the way of immigrants entering the country. If an individual has a hardship in enrolling for coverage, we urge you to consider exemptions from this requirement.

C4HCO also opposes the emergency nature of this process. Absent clear information that there is an actual emergency, the public would greatly benefit from more deliberate policymaking. Moreover, the aim of this directive to encourage greater participation in health insurance would be better served by a more open and collaborative approach. We suggest the creation and distribution of materials for customers, brokers, navigators and immigration advocates to mitigate confusion and anxiety. Providing these resources would prove that the intent of this directive is to help those in need.

C4HCO remains committed to increasing health insurance access, affordability and choice for all individuals and their families. We will do our part to ensure that correct, accurate information and assistance is available to every Coloradan.

Sincerely,

Connect for Health Colorado Staff