

July 12, 2022

The Honorable Janet Yellen
Secretary
U.S. Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20220

The Honorable Xavier Becerra
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Re: Public Comment on Section 1332 Waiver Application

Dear Secretaries Yellen and Becerra:

On behalf of the physician and medical student members of the American Medical Association (AMA), I appreciate the opportunity to provide public comment in support of Washington State's Section 1332 Waiver application. Covering the uninsured and improving health insurance affordability have been long-standing goals of the AMA, and we believe that approval of this waiver application will advance those goals in Washington State.

We know that, nationally, lawfully present and undocumented immigrants are more likely to be uninsured than citizens. Among the nonelderly population, 26 percent of lawfully present immigrants and 42 percent of undocumented immigrants are uninsured, compared to eight percent of citizens. Importantly, noncitizen children are more likely to be uninsured than citizen children.¹ With federal constraints in place limiting undocumented immigrants from accessing marketplace coverage without a waiver, it is important for states to consider taking action to expand access to high-quality and affordable health insurance coverage for this currently uninsured population.

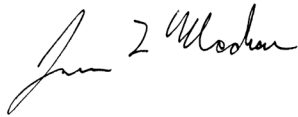
Approval of this application will not only expand access to comprehensive health insurance for the nearly 100,000 uninsured immigrants who are currently ineligible for Medicaid or marketplace coverage because of their immigration status in Washington State, but it is likely to increase enrollment of family members who may have different immigration statuses and are eligible for Medicaid or subsidized marketplace coverage as well.

¹ KFF. Health Coverage of Immigrants. April 6, 2022. Available at: <https://www.kff.org/racial-equity-and-health-policy/fact-sheet/health-coverage-of-immigrants/>.

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We appreciate the opportunity to provide comment in support of Washington State's Section 1332 Waiver application. We look forward to opportunities to work with you to continue to expand access to health insurance coverage for patients in your state. If you have any questions, please contact Margaret Garikes, Vice President, Division of Federal Affairs, at margaret.garikes@ama-assn.org or (202) 789-7409.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim L Madara". The signature is written in a cursive style with a large initial "J" and "M".

James L. Madara, MD

cc: Washington State Medical Association