



June 21, 2019

Nancy Potok  
Chief Statistician  
Office of Management and Budget  
Submitted via regulations.gov

RE: Request for Comment on the Consumer Inflation Measures Produced by Federal Statistical Agencies (OMB-2019-0002)

Dear Ms. Potok,

The Association of Asian Pacific Community Health Organizations (AAPCHO) appreciates the opportunity to respond to the Office of Management and Budget's Request for Comment on the Consumer Inflation Measures Produced by Federal Statistical Agencies, posted on May 7, 2019. AAPCHO strongly opposes this proposal and encourages OMB to rescind it entirely.

AAPCHO represents 35 community-based health care organizations, 29 of which are Federally Qualified Health Centers (FQHCs). AAPCHO members are dedicated to promoting the health status of medically underserved Asian America, Native Hawaiian and Pacific Island populations (AA&NHPIs) in the United States, the U.S. territories, and the Freely Associated States. AAPCHO members serve more than 630,000 patients annually, nearly three-quarters of whom fall within 100 percent of the current federal poverty line. The primarily low-income AA&NHPI patients and communities our members serve rely on a number of services to maintain their health and well-being enabling them to live as a critical part of our communities and economies. We are very concerned about this proposal's negative impact on our patients, their families, and the AA&NHPI community broadly.

AAPCHO opposes OMB's proposal to change how the Census Bureau updates the federal poverty thresholds, which would disproportionately affect low- and middle-income families. The OMB's proposed change to shift the inflation measure from the Consumer Price Index for All Urban Consumers (CPI-U) to the Chained Consumer Price Index for All Urban Consumers (C-CPI-U) or Personal Consumption Expenditures Price Index (PCEPI) would not improve the accuracy of the poverty line. Rather, these changes will underestimate inflation rates for low-income families and lower the poverty line over time.

Any attempt to measure poverty accurately must consider far more than a change in the inflation adjustment; it should take into account current estimates of income and expenditures. It should also take into account the considerable evidence that people with low incomes struggle with lack of access to health care, food insecurity, little or no savings, and trouble maintaining safe and stable housing. Redefining poverty does nothing to help the families who are struggling to make ends meet with too little.

Lowering the poverty thresholds will reduce eligibility levels for certain benefits and assistance that low-income AA&NHPIs need. Nearly two-thirds of AAPCHO members' patients rely on Medicaid and many will lose access to critical preventive and health care services under this proposal. Without access to Medicaid, AAPCHO members' patients will have few other affordable

options for health insurance and will likely become uninsured. Studies show that uninsured patients are more likely to delay or forgo health care services—with negative impacts on their health and health care outcomes.

Alternatively, when they are insured, people are more willing to access preventive and primary care because there is less concern about surprise medical bills. People with coverage also report improved mental health, and reduced clinical depression compared to people who are uninsured. Driving people away from using mental health services is a mistake that will lead to higher costs in the long-term, particularly for community health center patients who are already dealing with exposure to violence, stresses of poverty, and who are living in neighborhoods that are severely under-resourced. Seniors and people with disabilities would be forced to pay higher premiums and have more out-of-pocket expenses for their prescription drugs. Additionally, the children our members serve will have lifelong physical and mental health consequences that will be left unaddressed.

Furthermore, if implemented, the impacts of this proposal will be particularly devastating because they will worsen over time. As the rate of inflation is underestimated and reduced every year, this proposal would result in a lower poverty line with no meaningful changes to income or an individual's economic circumstances. Overall, the drastic change from the current poverty line to the proposed poverty line will result in low-income families falling further behind.

OMB's proposal fails to recognize the significant negative repercussions it will have on low-income families who are already strained by the existing inadequacy of poverty thresholds. Many of these families will be disqualified and removed from programs that were designed to provide them with critical assistance necessary to maintain their health and well-being. Importantly for AAPCHO members, low-income AA&NHPI families need access to nutritious food, high quality health care, and affordable childcare. Instead, this proposal moves the bar and leaves people further and further behind. We urge OMB to rescind this proposal and to maintain the current methodology for measuring poverty thresholds.

Sincerely,

A handwritten signature in black ink that reads "Adam P. Carbullido". The signature is written in a cursive, flowing style.

Adam P. Carbullido  
Director of Policy and Advocacy