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13	Public Health Social Work Section
14	Men's Health Caucus
15	Community Health Workers
16	
17	IV. <u>Collaborating units</u>
18	This statement does not have collaborating units.
19	
20	V. <u>Endorsement</u>
21	Chiropractic Health Care Section
22	Injury Control and Emergency Health Services
23	Podiatric Health Section
24	Sexual and Reproductive Health Section
25	Lesbian, Gay, Bisexual, and Transgender Caucus of Public Health Professionals
26	Women's Caucus
27	Arkansas Public Health Association
28	Colorado Public Health Association
29	Connecticut Public Health Association
30	Delaware Public Health Association
31	Metropolitan Washington Public Health Association
32	Nevada Public Health Association
33	Puerto Rico Public Health Association
34	Southern California Public Health Association

- 1 Tennessee Public Health Association
- 2 Washington State Public Health Association
- 3 North Dakota Public Health Association
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- 5 Latino Caucus
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- 10 Mental Health Section
- 11 Vision Care Section
- 12 Caucus for Refugee and Immigrant Health
- 13 Alcohol, Tobacco, and Other Drugs Section

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VI. <u>Summary</u>

The COVID pandemic adds a new sense of urgency to establish a universal health care system in the United States. Our current system is inequitable, does not adequately cover vulnerable groups, is cost-prohibitive, and lacks the flexibility to respond to periods of economic and health downturns. During economic declines, our employer-supported insurance system results in millions of Americans losing access to care. While the Affordable Care Act (ACA) significantly increased Americans' coverage, it remains expensive and is under constant legal threat, making the ACA an unreliable conduit of care. Relying on Medicaid as a safety net is untenable because, although enrollment has increased, states are making significant Medicaid cuts to balance budgets. During the COVID-19 pandemic, countries with universal health care leveraged their systems to mobilize resources and ensure testing and care for their residents. Additionally, research shows that expanding health coverage decreases health disparities and supports vulnerable populations' access to care.

This policy statement advocates for universal healthcare as adopted by the United Nations General Assembly in October 2019 where "universal health coverage implies that all people have access, without discrimination, to nationally determined sets of the needed promotive, preventive, curative, rehabilitative and palliative essential health services, and essential, safe, affordable, effective and quality medicines and vaccines, while ensuring that the use of these services does not expose the users to financial hardship, with a special emphasis on the poor, vulnerable and marginalized segments of the population."

We advocate for the overall goal of achieving a system that cares for everyone. We refrain from supporting one particular system, as the substantial topic of payment models deserves singular attention and is beyond the scope of this policy statement.

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Relationship to existing APHA policy statements

- 6 We propose this statement replaces the following one, which is set to archive in 2020:
- APHA Policy Statement 200007: Support for a new Campaign for Universal Health Care
- 8 The following APHA policy statements support the purpose of this statement by advocating for health
- 9 reform:
- APHA Policy Statement 200911: Public Health's Critical Role in Health Reform in the United States
- APHA Policy Statement 201415: Support for Social Determinants of Behavioral Health and
- 12 Pathways for Integrated and Better Public Health
- Additionally, this statement is consistent with the following APHA policies that reference public health's
- role in disaster response:
- APHA Policy Statement 20198: Public Health Support for Long-Term Responses in High-Impact,
- 16 Post-disaster Settings
- APHA Policy Statement 6211(PP): The Role of State and Local Health Departments in Planning for
- 18 Community Health Emergencies
- APHA Policy Statement 9116: Health Professionals and Disaster Preparedness
- APHA Policy Statement 20069: Response to Disasters: Protection of Rescue and Recovery Workers,
- Volunteers, and Residents Responding to Disasters

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VII. Rationale for consideration

24 COVID-19 has wreaked havoc on the United States' health and economy. One particular

consequence is that many Americans have lost their jobs and, as a result, their employer-sponsored health

insurance. Without proper healthcare for all Americans, controlling the pandemic and stemming its spread

becomes nearly impossible.

While the discussion of universal healthcare in the United States is not new, the COVID-19

pandemic adds a new urgency by focusing on the inaccessibility, inflexibility, and inequity in our current

health system.² The abnormally high demand for health care during the pandemic makes this late-breaker

31 policy statement particularly relevant for this year's meeting.

Rather than preclude adopting universal healthcare, economic and state crises can act as a catalyst

to develop more inclusive and comprehensive systems. For instance, France, Japan, and the United

- 1 Kingdom established universal healthcare in their recoveries after World War II and Rwanda also did so
- 2 after the 1994 genocide. Both poor and rich countries have established universal healthcare. While the
- 3 COVID-19 pandemic brings economic and public health challenges, it also provides the opportunity to
- 4 reconstruct our healthcare system to make it more resilient, equitable, and accessible for all Americans.

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VIII. Problem Statement

- 7 Background.
- 8 Discussions around universal health care in the United States started in the 1910s and have resurfaced
- 9 periodically.[1] President Franklin D. Roosevelt attempted twice in the 1940s to establish universal health
- 10 care and failed both times.[1] Eventually, the U.S. Congress passed Medicare and Medicaid in the 1960s.
- Universal health care more recently gained attention during debates on and eventual passage of the
- 12 Affordable Care Act (ACA).[2]

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- To date, the U.S. government remains the largest payer of health care in the United States, covering
- 15 nearly 90 million Americans through Medicare, Medicaid, TRICARE, and the Children's Health
- 16 Insurance Program (CHIP).[3] However, this coverage is not universal, and many Americans were
- uninsured[4] or underinsured[5] before the COVID-19 pandemic.

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- 19 The COVID-19 pandemic has exacerbated underlying issues in our current health care system and
- highlighted the urgent need for universal health care for all Americans.

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- Health care is inaccessible for many individuals in the United States
- For many Americans, accessing health care is cost prohibitive.[6] Coverage under employer-based
- insurance is vulnerable to fluctuations in the economy. Due to the COVID-19 pandemic, an estimated 10
- 25 million Americans have lost their employer-sponsored health insurance by January 2021 as a result of job
- loss.[7] When uninsured or underinsured people refrain from seeking care secondary to cost issues, this
- leads to delayed diagnosis and treatment, promotes the spread of COVID-19, and may increase overall
- health care system costs.

- 30 The ACA reformed health care by, for instance, eliminating exclusions for preexisting conditions,
- 31 requiring coverage of 10 standardized essential health care services, capping out-of-pocket expenses, and
- 32 significantly increasing the number of insured Americans. However, many benefits remain uncovered,
- and out-of-pocket costs can vary considerably. For example, an ACA average deductible (\$3,064) is twice
- 34 the rate of a private health plan (\$1,478).[4] Those living with a disability or chronic illness are likely to

B6- The Importance of Universal Healthcare in Improving our Nation's Response to Pandemics and **Health Disparities** 1 use more health services and pay more. A recent survey conducted during the COVID-19 pandemic 2 revealed that 38.2% of working adults and 59.6% of adults receiving unemployment benefits from the 3 Coronavirus Aid, Relief, and Economic Security (CARES) Act could not afford a \$400 expense, 4 highlighting that the COVID-19 pandemic has exacerbated lack of access to health care because of high 5 out-of-pocket expenses.[8] In addition, the ACA did not cover optometry or dental services for adults, 6 thereby inhibiting access to care even among the insured population.[9] 7 8 Our current health care system cannot adequately respond to the pandemic and supply the care it 9 demands 10 11 As in other economic downturns wherein people lost their employer-based insurance, more people 12 enrolled in Medicaid during the pandemic. States' efforts to cover their population, such as expanding 13 eligibility, allowing self-attestation of eligibility criteria, and simplifying the application process, also 14 increased Medicaid enrollment numbers.[10] The federal "maintenance of eligibility" requirements 15 further increased the number of people on Medicaid by postponing eligibility redeterminations. While 16 resuming eligibility redeterminations will cause some to lose coverage, many will remain eligible because 17 their incomes continue to fall below Medicaid income thresholds.[10] 18 19 An urgent need for coverage during the pandemic exists. Virginia's enrollment has increased by 20% 20 since March 2020. In Arizona, 78,000 people enrolled in Medicaid and CHIP in 2 months.[11] In New 21 Mexico, where 42% of the population was already enrolled in Medicaid, 10,000 more people signed up in 22 the first 2 weeks of April than expected before the pandemic.[11] Nearly two dozen million people who 23 lost their jobs during the pandemic could be eligible for Medicaid by January 2021.[12] 24 25 While increasing Medicaid enrollment can cover individuals who otherwise cannot afford care, it further 26 strains state budgets.[11] Medicaid spending represents a significant portion of states' budgets, making it 27 a prime target for cuts. Ohio announced \$210 million in cuts to Medicaid, a significant part of Colorado's 28 \$229 million in spending cuts came from Medicaid, Alaska cut \$31 million in Medicaid, and Georgia 29 anticipates 14% reductions overall.[11] 30 31 While Congress has authorized a 6.2% increase in federal Medicaid matching, this increase is set to 32 expire at the end of the public health emergency declaration (currently set for April, 20 2021[13] and is

unlikely to sufficiently make up the gap caused by increased spending and decreased revenue.[14] Given

the severity and projected longevity of the pandemic's economic consequences, many people will remain

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1 enrolled in Medicaid throughout state and federal funding cuts. This piecemeal funding strategy is

2 unsustainable and will strain Medicaid, making accessibility even more difficult for patients.

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- 4 Our health care system is inequitable
- 5 Racial disparities are embedded in our health care system and lead to worse COVID-19 health outcomes
- 6 in minority groups. The first federal health care program, the medical division of the Freedmen's Bureau,
- 7 was established arguably out of Congress's desire for newly emancipated slaves to return to working
- 8 plantations in the midst of a smallpox outbreak in their community rather than out of concern for their
- 9 well-being.[15] An effort in 1945 to expand the nation's health care system actually reinforced
- segregation of hospitals.[15] Moreover, similar to today, health insurance was employer based, making it
- 11 difficult for Black Americans to obtain.

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- 13 Although the 1964 Civil Rights Act outlawed segregation of health care facilities receiving federal
- funding and the 2010 ACA significantly benefited people of color, racial and sexual minority disparities
- persist today in our health care system. For example, under a distribution formula set by the U.S.
- Department of Health and Human Services (DHHS), hospitals reimbursed mostly by Medicaid and
- Medicare received far less federal funding from the March 2020 CARES Act and the Paycheck Protection
- Program and Health Care Enhancement Act than hospitals mostly reimbursed by private insurance.[16]
- 19 Hospitals in the bottom 10% based on private insurance revenue received less than half of what hospitals
- in the top 10% received. Medicare reimburses hospitals, on average, at half the rate of private insurers.
- 21 Therefore, hospitals that primarily serve low-income patients received a disproportionately smaller share
- of total federal funding.[16]

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- 24 Additional barriers for these communities include fewer and more distant testing sites, longer wait
- 25 times,[17] prohibitive costs, and lack of a usual source of care.[18] Black Americans diagnosed with
- 26 COVID-19 are more likely than their White counterparts to live in lower-income zip codes, to receive
- tests in the emergency department or as inpatients, and to be hospitalized and require care in an intensive
- care unit.[19] Nationally, only 20% of U.S. counties are disproportionately Black, but these counties
- account for 52% of COVID-19 diagnoses and 58% of deaths.[20] The pre-pandemic racial gaps in health
- 30 care catalyzed pandemic disparities and will continue to widen them in the future.

- 32 Our health care system insufficiently covers vulnerable groups
- About 14 million U.S. adults needed long-term care in 2018.[21] Medicare, employer-based insurance,
- 34 and the ACA do not cover home- and community-based long-term care. Only private long-term care

B6- The Importance of Universal Healthcare in Improving our Nation's Response to Pandemics and Health Disparities insurance and patchwork systems for Medicaid-eligible recipients cover such assistance. For those paying out of pocket, estimated home care services average \$51,480 to \$52,624 per year, with adult day services

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- 5 Our current health care system also inadequately supports individuals with mental illness. APHA
- 6 officially recognized this issue in 2014, stating that we have "lacked an adequate and consistent public
- 7 health response [to behavioral health disorders] for several reasons" and that the "treatment of mental
- 8 health and substance use disorders in the United States has been provided in segregated, fragmented, and
- 9 underfunded care settings."[23]

at more than \$19,500 per year.[22]

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- 11 The COVID-19 pandemic has brought urgency to the universal health care discussion in the United
- 12 States. This is an unprecedented time, and the pandemic has exacerbated many of the existing problems in
- our current patchwork health care system. The COVID-19 pandemic is a watershed moment where we
- can reconstruct a fractured health insurance system into a system of universal health care.

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IX. Evidence-Based Strategies to Address the Problem

- We advocate for the definition of universal health care outlined in the 2019 resolution adopted by the
- 18 United Nations General Assembly, which member nations signed on to, including the United States.
- 19 According to this resolution, "universal health coverage implies that all people have access, without
- discrimination, to nationally determined sets of the needed promotive, preventive, curative, rehabilitative
- and palliative essential health services, and essential, safe, affordable, effective and quality medicines and
- vaccines, while ensuring that the use of these services does not expose the users to financial hardship,
- with a special emphasis on the poor, vulnerable and marginalized segments of the population."[24]

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- Our current system is inaccessible, inflexible, and inequitable, and it insufficiently covers vulnerable
- populations. Here we present supporting evidence that universal health care can help address these issues.

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- 28 Universal health care can increase accessibility to care
- 29 Evidence supporting universal health care is mostly limited to natural experiments and examples from
- 30 other countries. Although countries with universal health care systems also struggle in containing the
- 31 COVID-19 pandemic, their response and mortality outcomes are better owing to their robust universal
- 32 systems.[25]

Health Disparities 1 While individuals in the United States lost health care coverage during the pandemic, individuals in 2 countries with universal health care were able to maintain access to care. [26–28] Some European and East 3 Asian countries continue to offer comprehensive, continuous care to their citizens during the pandemic. 4 5 Taiwan's single-payer national health insurance covers more than 99% of the country's population, 6 allowing easy access to care with copayments of \$14 for physician visits and \$7 for prescriptions. On 7 average, people in Taiwan see their physician 15 times per year. [27] Also, coronavirus tests are provided 8 free of charge, and there are sufficient hospital isolation rooms for confirmed and suspected cases of 9 COVID-19.[28] 10 11 Thai epidemiologists credit their universal health care system with controlling the COVID-19 12 pandemic.[29] They have described how their first patient, a taxi driver, sought medical attention 13 unencumbered by doubts about paying for his care. They benefit from one of the lowest caseloads in the 14 world.[29] 15 16 Universal health care is a more cohesive system that can better respond to health care demands during 17 the pandemic and in future routine care 18 Leveraging its universal health care system, Norway began aggressively tracking and testing known 19 contacts of individuals infected with COVID-19 as early as February 2020. Public health officials 20 identified community spread and quickly shut down areas of contagion. By April 30, Norway had 21 administered 172,586 tests and recorded 7,667 positive cases of COVID-19. Experts attribute Norway's 22 success, in part, to its universal health care system. [26] Norway's early comprehensive response and 23 relentless testing and tracing benefited the country's case counts and mortality outcomes. 24 25 Once China released the genetic sequence of COVID-19, Taiwan's Centers for Disease Control 26 laboratory rapidly developed a test kit and expanded capacity via the national laboratory diagnostic 27 network, engaging 37 laboratories that can perform 3,900 tests per day.[28] Taiwan quickly mobilized 28 approaches for case identification, distribution of face masks, containment, and resource allocation by 29 leveraging its national health insurance database and integrating it with the country's customs and 30 immigration database daily.[28] Taiwan's system proved to be flexible in meeting disaster response 31 needs. 32 33 Although these countries' success in containing COVID-19 varied, their universal health care systems

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allowed comprehensive responses.

B6- The Importance of Universal Healthcare in Improving our Nation's Response to Pandemics and

1 2 *Universal health care can help decrease disparities and inequities in health* 3 Several factors point to decreased racial and ethnic disparities under a universal health care model. 4 CHIP's creation in 1997 covered children in low-income families who did not qualify for Medicaid; this 5 coverage is associated with increased access to care and reduced racial disparities.[30] Similarly, 6 differences in diabetes and cardiovascular disease outcomes by race, ethnicity, and socioeconomic status 7 decline among previously uninsured adults once they become eligible for Medicare coverage.[31] While 8 universal access to medical care can reduce health disparities, it does not eliminate them; health inequity 9 is a much larger systemic issue that society needs to address. 10 11 *Universal health care better supports the needs of vulnerable groups* 12 The United States can adopt strategies from existing models in other countries with long-term care 13 policies already in place. For example, Germany offers mandatory long-term disability and illness 14 coverage as part of its national social insurance system, operated since 2014 by 131 nonprofit sickness 15 funds. German citizens can receive an array of subsidized long-term care services without age 16 restrictions.[32] In France, citizens 60 years and older receive long-term care support through an income-17 adjusted universal program.[33] 18 19 Universal health care can also decrease health disparities among individuals with mental illness. For 20 instance, the ACA Medicaid expansion helped individuals with mental health concerns by improving 21 access to care and effective mental health treatment.[34] 22 23 X. **Opposing Arguments/Evidence** 24 Universal health care is more expensive 25 Government spending on Medicare, Medicaid, and CHIP has been increasing and is projected to grow 26 6.3% on average annually between 2018 and 2028.[35] In 1968, spending on major health care programs 27 represented 0.7% of the gross domestic product (GDP); in 2018 it represented 5.2% of the GDP, and it is 28 projected to represent 6.8% in 2028.[35] These estimates do not account for universal health care, which, 29 by some estimates, may add \$32.6 trillion to the federal budget during the first 10 years and equal 10% of 30 the GDP in 2022.[36] 31 32 Counterpoint: Some models of single-payer universal health care systems estimate savings of \$450 billion 33 annually.[37] Others estimate \$1.8 trillion in savings over a 10-year period.[38] In 2019, 17% of the U.S.

1 GDP was spent on health care; comparable countries with universal health care spent, on average, only 2 8.8%.[39] 3 4 Counterpoint: Health care services in the United States are more expensive than in other economically 5 comparable countries. For example, per capita spending on inpatient and outpatient care (the biggest 6 driver of health care costs in the United States) is more than two times greater even with shorter hospital 7 stays and fewer physician visits.[40] Overall, the United States spends over \$5,000 more per person in 8 health costs than countries of similar size and wealth.[40] 9 10 Counterpoint: Administrative costs are lower in countries with universal health care. The United States 11 spends four times more per capita on administrative costs than similar countries with universal health 12 care.[41] Nine percent of U.S. health care spending goes toward administrative costs, while other 13 countries average only 3.6%. In addition, the United States has the highest growth rate in administrative 14 costs (5.4%), a rate that is currently double that of other countries.[41] 15 16 Universal health care will lead to rationing of medical services, increase wait times, and result in care 17 that is inferior to that currently offered by the U.S. health care system. 18 Opponents of universal health care point to the longer wait times of Medicaid beneficiaries and other 19 countries as a sign of worse care. It has been shown that 9.4% of Medicaid beneficiaries have trouble 20 accessing care due to long wait times, as compared with 4.2% of privately insured patients. [42] Patients 21 in some countries with universal health care, such as Canada and the United Kingdom, experience longer 22 wait times to see their physicians than patients in the United States.[43] In addition, some point to lower 23 cancer death rates in the United States than in countries with universal health care as a sign of a superior 24 system.[44] 25 26 Another concern is rationing of medical services due to increased demands from newly insured 27 individuals. Countries with universal health care use methods such as price setting, service restriction, 28 controlled distribution, budgeting, and cost-benefit analysis to ration services.[45] 29 30 Counterpoint: The Unites States already rations health care services by excluding patients who are unable 31 to pay for care. This entrenched rationing leads to widening health disparities. It also increases the 32 prevalence of chronic conditions in low-income and minority groups and, in turn, predisposes these 33 groups to disproportionately worse outcomes during the pandemic. Allocation of resources should not be

B6- The Importance of Universal Healthcare in Improving our Nation's Response to Pandemics and

Health Disparities

- determined by what patients can and cannot afford. This policy statement calls for high-value, evidence-
- 2 based health care, which will reduce waste and decrease rationing.

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- 4 Counterpoint: Opponents of universal health care note that Medicaid patients endure longer wait times to
- 5 obtain care than privately insured patients [42] and that countries with universal health care have longer
- 6 wait times than the United States.[43] Although the United States enjoys shorter wait times, this does not
- 7 translate into better health outcomes. For instance, the United States has higher respiratory disease,
- 8 maternal mortality, and premature death rates and carries a higher disease burden than comparable
- 9 wealthy countries.[46]

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- 11 Counterpoint: A review of more than 100 countries' health care systems suggests that broader coverage
- increases access to care and improves population health.

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- 14 Counterpoint: While it is reasonable to assume that eliminating financial barriers to care will lead to a rise
- in health care utilization because use will increase in groups that previously could not afford care, a
- review of the implementation of universal health care in 13 capitalist countries revealed no or only small
- 17 (less than 10%) post-implementation increases in overall health care use.[47] This finding was likely
- related to some diseases being treated earlier, when less intense utilization was required, as well as a shift
- in use of care from the wealthy to the poorest.[47]

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XI. Alternative Strategies

- 22 States and the federal government can implement several alternative strategies to increase access to health
- care. However, these strategies are piecemeal responses, face legal challenges, and offer unreliable
- assurance for coverage. Importantly, these alternative strategies also do not necessarily or explicitly
- acknowledge health as a right.

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- 27 State strategies
- The remaining 14 states can adopt the Medicaid expansions in the ACA, and states that previously
- 29 expanded can open new enrollment periods for their ACA marketplaces to encourage enrollment.[48]
- While this is a strategy to extend coverage to many of those left behind, frequent legal challenges to the
- 31 ACA and Medicaid cuts make it an unreliable source of coverage in the future. In addition, although
- many people gained insurance, access to care remained challenging due to prohibitively priced premiums
- and direct costs.

- 1 Before the pandemic, the New York state legislature began exploring universal single-payer coverage,
- and the New Mexico legislature started considering a Medicaid buy-in option.[49] These systems would
- 3 cover only residents of a particular state, and they remain susceptible to fluctuations in Medicaid cuts,
- 4 state revenues, and business decisions of private contractors in the marketplace.

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- 6 Federal government strategies
- 7 Congress can continue to pass legislation in the vein of the Families First Coronavirus Response Act and
- 8 the CARES Act. These acts required all private insurers, Medicare, and Medicaid to cover COVID-19
- 9 testing, eliminate cost sharing, and set funds to cover testing for uninsured individuals. They fell short in
- 10 requiring assistance with COVID-19 treatment. A strategy of incremental legislation to address the
- pandemic is highly susceptible to the political climate, is unreliable, and does not address non-COVID-19
- health outcomes. Most importantly, this system perpetuates a fragmented response to the COVID-19
- pandemic.

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- An additional option for the federal government is to cover the full costs of Medicaid expansion in the 14
- states yet to expand coverage. If states increased expansion and enforced existing ACA regulations,
- 17 nearly all Americans could gain health insurance.[50] This alternative is risky, however, due to frequent
- legal challenges to the ACA. Furthermore, high costs to access care would continue to exist.

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XII. Action Steps

- 21 This statement reaffirms APHA's support of the right to health through universal health care. Therefore,
- 22 APHA:
- 1. Urges Congress and the president to recognize universal health care as a right.
- 24 2. Urges Congress to fund and design and the president to enact and implement a comprehensive
- 25 universal health care system that is accessible and affordable for all residents; that ensures access
- to rural populations, people experiencing homelessness, sexual minority groups, those with
- disabilities, and marginalized populations; that is not dependent on employment, medical or
- mental health status, immigration status, or income; that emphasizes high-value, evidence-based
- 29 care; that includes automatic and mandatory enrollment; and that minimizes administrative
- 30 burden.
- 3. Urges Congress and states to use the COVID-19 pandemic as a catalyst to develop an inclusive
- and comprehensive health care system that is resilient, equitable, and accessible.
- 4. Urges the DHHS, the Agency for Healthcare Research and Quality, the Institute of Medicine, the
- National Institutes of Health, academic institutions, researchers, and think tanks to examine

- equitable access to health care, including provision of mental health care, long-term care, dental care, and vision care.
 - 5. Urges Congress, national health care leaders, academic institutions, hospitals, and each person living in the United States to recognize the harms caused by institutionalized racism in our health care system and collaborate to build a system that is equitable and just.
 - 6. Urges Congress to mandate the Federal Register Standards for Accessible Medical Diagnostic Equipment to meet the everyday health care physical access challenges of children and adults with disabilities.
- Urges national health care leaders to design a transition and implementation strategy that
 communicates the impact of a proposed universal health care system on individuals, hospitals,
 health care companies, health care workers, and communities.
 - 8. Urges Congress, the Centers for Disease Control and Prevention, the DHHS, and other public health partners, in light of the COVID-19 pandemic, to recognize the need for and supply adequate funding for a robust public health system. This public health system will prepare for, prevent, and respond to both imminent and long-term threats to public health, as previously supported in APHA Policy Statement 200911.

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