

Executive Summary – Gender Transition Surgery

A growing number of employers, both public and private, are providing coverage in employee health benefits plans for transition related health care to treat gender dysphoria, including but not limited to the City of Reno, the State of Nevada and the City of Las Vegas. Based on a study by the University of San Francisco and in research provided by our third party administrators, the average cost of this surgery is \$29,929.00.

Based on legal opinion, such coverage will soon be required by the Affordable Care Act. Even if the proposed rule is not promulgated, the current policy exposes the City to potential liability under general anti-discrimination laws, including the Equal Protection Clause of the United States Constitution. Therefore, legal opinion recommends that the City of Sparks replace its blanket exclusion for gender reassignment surgery and adopt coverage similar to the plan adopted by the City of Reno.

The Group Health Committee, based on legal opinion, voted unanimously to recommend to the Sparks City Council the inclusion of coverage for Gender Transition Surgery following the language of the City of Reno, which states:

Eligible Medical Expenses - Gender reassignment surgery consisting of any combination of the following when the following criteria is met:

- 1) Requirement for mastectomy for female-to-male patients:
 - Single letter of referral from a qualified mental health professional; and
 - Persistent, well-documented gender dysphoria (see Appendix); and
 - Capacity to make a fully informed decision and to consent for treatment; and
 - Age of majority (18 years of age or older); and
 - If significant medical or mental health concerns are present, they must be reasonably well controlled.

- 2) Requirements for gonadectomy (hysterectomy and oophorectomy in female-to-male and orchiectomy in male-to-female):
 - Two referral letters from qualified mental health professionals, one in a purely evaluative role; and
 - Persistent, well-documented gender dysphoria; and
 - Capacity to make a fully informed decision and to consent for treatment; and
 - Age of majority (18 years of age or older); and
 - If significant medical or mental health concerns are present, they must be reasonably well controlled; and
 - Twelve months of continuous hormone therapy as appropriate to the member's gender goals (unless the member has a medical contraindication or is otherwise unable or unwilling to take hormones.)

- 3) Requirements for genital reconstructive surgery (i.e., vaginectomy, urethroplasty, metoidioplasty, phalloplasty, scrotoplasty, and placement of a testicular prosthesis and erectile prosthesis in female-to-male; penectomy, vaginoplasty, labiaplasty and clitoroplasty in male-to-female):
 - Two referral letters from qualified mental health professionals, one in a purely evaluative role; and
 - Persistent, well-documented gender dysphoria; and
 - Capacity to make a fully informed decision and to consent for treatment; and

- Age of majority (18 years of age or older); and
- If significant medical or mental health concerns are present, they must be reasonably well controlled; and
- Twelve months of continuous hormone therapy as appropriate to the member's gender goals (unless the member has a medical contraindication or is otherwise unable or unwilling to take hormones); and
- Twelve months of living in a gender role that is congruent with their gender identity (real life experience.)

Medical Limitations & Exclusions - Gender Reassignment – Surgery, services and supplies when the criteria required under Gender Reassignment, listed in the Eligible Medical Expenses section, is not met. Procedures that may be performed as a component of a gender reassignment as cosmetic (not an all-inclusive list) will not be covered: abdominoplasty, blepharoplasty brow lift, calf implants, cheek/malar implants, chin/nose implants, collagen injections, construction of a clitoral hood, drugs for hair loss or growth, forehead lift, hair removal/hair transplantation, lip reduction, liposuction, mastopexy, neck tightening, pectoral implants, removal of redundant skin, rhinoplasty, voice therapy/voice lessons.