



Washington Apple Health (Medicaid) is Considering Changing Coverage Rules for Transition-Related Care

The Washington State Health Care Authority (HCA) is proposing to change the rules for Apple Health's coverage for transition-related care. You can read HCA's proposal at bit.ly/HCAproposal, and learn how to take action in the sections below.

What are the proposed changes?

HCA is thinking about changing the rules it first adopted in 2015 for gender dysphoria treatment.

In some ways, HCA's proposed changes should make it a bit easier for Apple Health clients to get coverage for transition-related care. In general, HCA's proposal would make the current rules less complicated for clients and medical providers and would get rid of some unnecessary gatekeeping requirements.

But HCA's changes do not eliminate all the issues created by the current rules, and in some cases, may make these problems worse for clients trying to get transition-related medical care. The key areas that are still problematic include:

- **Noncovered services:** HCA would still not cover some transition-related medical care (some examples include facial hair removal, facial feminization, trachea shaves, and voice therapy). These "noncovered" services are medically necessary for many Apple Health clients to treat their gender dysphoria. Clients who need these "noncovered" services could only ask for coverage under an "exception to rule." It is very hard to get coverage under "exception to rule," and denials cannot be appealed.
- **Pre-surgical requirements:** For many surgical procedures, the proposed rules would require "two separate comprehensive psychosocial evaluations performed by two separate licensed mental health providers within the twelve months preceding surgery." This requirement can be hard for many Apple Health clients to meet.
- **Treatment of youth:** All youth under the age of 21 should get all medical care that is safe and effective, medically necessary and not experimental, including gender dysphoria treatment. These proposed rules may unreasonably limit youth access to gender dysphoria treatment.

How can I tell HCA what I think about the proposed rules?

- Send **written comments** by email to HCA at arc@hca.wa.gov by **November 6, 2018**, and
- Attend a **public hearing** in Olympia on November 6, 2018 at 10:00 am at the Health Care Authority's office in Olympia. The address for the hearing is Cherry Street Plaza, 626 8th Avenue, Olympia, WA. Anyone can testify in-person at the public hearing.

All comments and testimony submitted to HCA are public records and **are not confidential**. Think about what information you are willing to share with HCA and the public.

What should my comments say?

It's important to let HCA know if you are worried about the proposed changes to gender dysphoria treatment under Apple Health. ***If you've had problems getting transition-related care from Apple Health, this is also an opportunity to let the agency know about your experiences and how your problems getting coverage affected your health concerns.***

Comments don't have to be long, and can be sent as an email message to HCA at arc@hca.wa.gov. Again, comments are due by **November 6, 2018**. The best messages are from your personal experience, but here is an example of a message that focuses on concerns about noncovered services:

Dear HCA:

I am submitting comments on the Health Care Authority's proposal to change the rules for Apple Health's gender dysphoria treatment program (WSR 18-20-123).

I am concerned that the proposed rules continue to list many services as "noncovered," even though these services are medically necessary to treat gender dysphoria for many people. I urge you to remove the "noncovered" services list from the rules and to make it clear that requests for these services are evaluated based on medical necessity, rather than as "exceptions" to the rule.

Treatment of gender dysphoria must be individualized, depending on the needs of each client. Apple Health should cover all services that are medically necessary to treat gender dysphoria.

[If you or a loved one have experience with trying to get gender dysphoria treatment, you may want to provide that information.]

Sincerely,

[Your name]

Questions?

Please contact Anya Morgan (she/her) at anya@lavenderrightsproject.org.

The Coalition for Inclusive Healthcare is a broad group of organizations and individuals that support inclusive healthcare for transgender people in Washington.