

Submit written comments to:

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Other: By (date) November 9, 2021

<https://www.insurance.wa.gov/contact-rules-coordinator>

To Whom it May Concern:

Our names are EJ Dusic, Robby Hardy, Kat Taylor, Karissa Yamaguchi, Jennifer Perkins, and Arielle Howell. We are an interdisciplinary group of graduate and medical students within the programs of nursing, public health, occupational therapy, medicine, and social work at the University of Washington. Our comments in this letter reflect our own opinions and personal perspectives on the proposed senate bill.

We are writing to thank you for the role you played in supporting the passage of SB5313 and for these proposed rules. SB5313 appropriately extended access to gender affirming procedures for transgender and nonbinary persons in Washington state. Evidence has shown that transgender and nonbinary populations report significant barriers to accessing all kinds of healthcare, including gender-affirming medical care in the United States. The 2015 US Transgender Survey showed that over twenty percent of respondents avoided going to the doctor due to fear of discrimination. Lack of access to gender affirming care results in poor physical and mental health outcomes such as increased violence, greater risk of sexually transmitted infections, and poorer mental health (which has the potential to lead to increased suicide rates). It is of the utmost importance that we reduce any and all barriers to both medical care and gender-affirming care for transgender and nonbinary populations. We believe that the passing of SB5313 was a huge success for Washington state and will save lives. Amongst the onslaught of anti-trans legislation that has been passed in the United States in recent years, we are proud to live in a state that is taking the charge in the fight for transgender rights through SB5313.

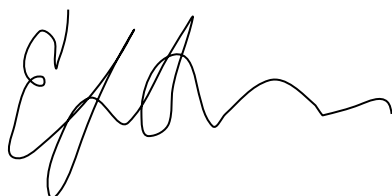
We wanted to bring forward the consideration to **integrate more inclusive language relating to hair removal procedures** in the rulemaking. While many transgender and nonbinary individuals who seek out hair removal procedures choose electrolysis, others may choose other routes such as laser hair removal or waxing. We believe that the **language in this bill should include all hair removal procedures and not limit transgender and nonbinary people to only choosing electrolysis**. Further, we believe it is important to **also explicitly include coverage of all facial gender affirming surgeries and revisions of all gender-affirming surgeries** as services that cannot be categorically excluded.

In the future, we hope to move even further in expanding access to gender-affirming care for transgender and nonbinary populations. Currently, in order for insurance companies to cover certain gender-affirming medical procedures (such as bilateral mastectomy or “top surgery” for transgender and nonbinary people experiencing gender dysphoria related to having breasts) they must first receive a diagnosis from a mental health professional. On top of the

offensive implication that being transgender is a mental health condition, this introduces several barriers. An individual must first find a mental health professional who is experienced in LGBTQIA+ issues, meet with them, and develop a relationship over the course of several months. Only after overcoming these obstacles will they be able to receive a letter stating that insurance should cover the cost of their desired medical procedure. A second example is in regard to electrolysis treatment. Many estheticians that perform electrolysis do not accept health insurance as a primary payment source, subsequently, individuals seeking hair removal for gender-affirming care are forced to pay the initial cost and receive reimbursement from their insurance afterwards. This creates barriers for persons without upfront funds to pay for such treatment. To combat this problem, insurance providers and healthcare systems must work to create a network of readily accessible clinics and salons that are able to perform gender-affirming care and accept insurance as payment. We hope the Office of the Insurance Commissioner will work with the state to remove these barriers.

Thank you for taking the time to read our letter and consider our comments. We would also like to thank the group of trans and nonbinary activists who have been leaders in the fight for transgender rights in Washington state and worked so that this bill could be possible. We are incredibly grateful and humbled to get the chance to support this important movement.

Sincerely,



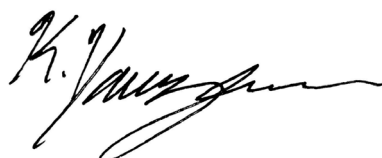
EJ Dusic (they/them), MPH



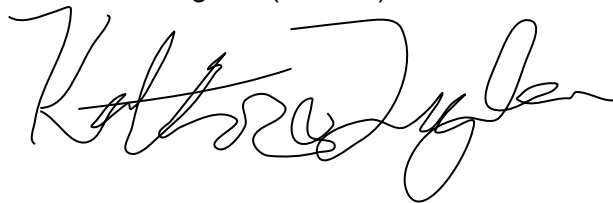
Arielle Howell (she/her), MD Candidate



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Kat Taylor (she/her), MOT



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