



AMERICAN SOCIETY OF  
PLASTIC SURGEONS®



THE PLASTIC SURGERY  
FOUNDATION®

Executive Office

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December 12, 2019

The Honorable Christy Blakely  
Medical Services Board President  
Department of Health Care Policy and Financing  
303 E. 17th Street  
Denver, CO 80203

RE: **MSB 19-09-04-B, Revision to the Medical Assistance Benefits Rule Concerning Transgender Services**

Dear President Blakey:

I am writing on behalf of the American Society of Plastic Surgeons (ASPS) in support of the proposed revision to MSB 19-09-04-B, Section 8.735, which would remove the requirement that transgender individuals seeking a mastectomy under the state's Transgender Services benefit first receive twelve months of continuous hormone therapy. ASPS is the largest association of plastic surgeons in the world, representing more than 7,000 members and 93 percent of all board-certified plastic surgeons in the United States – including 114 board-certified plastic surgeons in Colorado. Our mission is to advance quality care for plastic surgery patients, including those patients experiencing gender dysphoria, a condition in which a person experiences severe distress due to a disconnect between how they feel and their anatomic characteristics.

As surgeons who provide care for transgender individuals, our members know firsthand the effects of gender dysphoria. Individuals with gender dysphoria often describe being born in the wrong body, and plastic surgery is an important step in aligning their bodies with whom they know themselves to be. Care of individuals with gender dysphoria requires a multidisciplinary approach that may include mental health professionals, primary care physicians, endocrinologists, and plastic surgeons.

ASPS appreciates the Colorado Medical Service Board's efforts over the past year to improve the delivery of transgender services in Colorado with its latest rulemaking efforts. Foremost, we supported the Board's final rule that went into effect in June 2019 that would allow full coverage of permanent hair removal for transgender individuals. We would like to thank the Board for continuing to address the issue of gender confirmation coverage in the state with its latest revision to that rule that proposes to remove the existing requirement that a patient undergoes a year of hormone therapy before they can receive coverage for a mastectomy for gender transition purposes. As plastic surgeons, we know first-hand that there is no clinical evidence that demonstrates that 12 months of hormone therapy required prior to chest surgery in transgender patients delivers improved health outcomes.

We would like to thank the Board for recognizing that gender confirmation surgeries such as mastectomies are an important part of transgender patients' overall transition-related care that helps them better identify with their gendered self, which in turn enhances their psychological wellbeing and overall health. It is our firm belief that by working together, health care teams and insurers – both private and public – can help meet the World Professional Association for Transgender Health's high standards to enhance health, happiness, and contentment. The Board's proposed rule is a critical step in the right direction of achieving that goal and ensuring transgender individuals have quality health care.

For these reasons outlined above, we support the proposed revision to the rule and look forward to working with the Colorado Medical Services Board to protect the rights of the transgender community in Colorado. Thank you for your consideration of ASPS's comments. Please do not hesitate to contact Patrick Hermes, Director of Advocacy and Government Relations, at [phermes@plasticsurgery.org](mailto:phermes@plasticsurgery.org) or (847) 228-3331 with any questions or concerns.

Sincerely,

A handwritten signature in black ink, reading "Lynn Jeffers". The signature is written in a cursive, flowing style.

Lynn Jeffers, MD, MBA, FACS  
President, American Society of Plastic Surgeons

cc: Members, Colorado Medical Services Board