



Our mission is to protect and advance full equality for all lesbian, gay, bisexual, transgender, and queer Mainers by creating an inclusive and intersectional movement through political action, community building, education, engagement, and collaboration.

June 28, 2023

Timothy N. Schott
Acting Superintendent, Department of Professional and Financial Regulation
Bureau of Insurance
34 State House Station
Augusta, ME 04333-0034

Dear Superintendent Schott,

On behalf of EqualityMaine (EQME), I am writing to submit comments on the Proposed Rule Chapter 865, Standards for Fertility Coverage. EqualityMaine is the oldest and largest statewide organization dedicated to creating a fair and just society for lesbian, gay, bisexual, transgender, and queer Mainers.

EQME was a proud supporter of the fertility insurance legislation last session, and we appreciate the opportunity to provide our feedback on the draft rules. We also support comments that have previously been submitted jointly by GLBTQ Legal Advocates and Defenders (GLAD) and the American Society for Reproductive Medicine.

I particularly want to highlight that the definition of “fertility patient” in the Maine statute was carefully drafted, with input from various experts, to be inclusive of various people who need fertility treatment to try to achieve their dream of having a healthy baby. This includes LGBTQ+ couples, those pursuing solo parenthood, and those who need to seek in vitro fertilization to prevent severe genetic conditions in their offspring. This “fertility patient” language is what should be used in Section 4, subsection 1c, of the rules.

It is also critical that “fertility preservation services” continue to be included under Required Coverage.

Thank you for your consideration of our written comments, and please reach out to me at gdrew@equalitymaine.org or 207-761-3732.

Sincerely,

Gia Drew (she/her)
Executive Director, EqualityMaine