

From: [Niebuhr, Janet](#)
To: [Olson, Rebecca S](#)
Cc: [Imborek, Katie L](#)
Subject: HEI : documents needed - assistance requested
Date: Thursday, September 7, 2023 1:37:16 PM

Good afternoon Rebecca,

I shared copies of the benefits coverage and summary to HEI to verify if we are on track for our submission. Below is the response I received and the documents they are requiring this year. If it is helpful, I can schedule a meeting for you and Dr. Imborek. I greatly appreciate your time and assistance. Let me know how I can provide assistance.

Janet Niebuhr, MOL

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From: Healthcare Equality Index <hei@hrc.org>
Sent: Thursday, September 7, 2023 1:18 PM
To: Niebuhr, Janet <janet-niebuhr@uiowa.edu>
Subject: [External] Re: University of Iowa - assistance requested

Hi Janet-

Last year you all only provided the summary plan document and did not provide the clinical plan bulletin. The document that you have attached is the summary plan document.

We have strengthened the criteria this year with more of a clear focus on transparency and communication to employees about the benefits that are covered.

There are now three different documents that are required to be submitted and those are outlined below. Based on my quick review of just the SPD that you submitted, your plan does not clearly indicate the full range of treatments that are covered as it only mentions surgery. If the other documents provide more transparency of the full range of coverage you may still be able to receive credit.

Below is some information from the [HEI Resource Guide on this criteria](#).

Covered transgender-inclusive treatments and procedures must be clearly listed in the contract documentation and the scope of each benefit described clearly in the employee benefits materials so that employees and their eligible dependents can easily understand what is covered. The plan must eliminate other barriers to coverage.

For the HEI, facilities must submit three different documents to validate and prove

the availability of these benefits.

- The first document needed is your Summary Plan Documentation -- the contract your facility has with your insurer. This SPD will detail the various gender transition coverages available. So when an employee looks at their benefits package (and sees eligibility information, COBRA information, limitations, exclusions, etc), they would see that gender transition coverage is available.
 - The second document needed is the Clinical Plan Bulletin (sometimes called a medical policy) provided by your insurer. This document describes the overall range of gender transition services provided by the insurer. You can look at [this list](#) to find the standard Clinical Plan Bulletins for most insurers. Please note that the services of the insurer does NOT mean your organization necessarily offers these services. Your organization's SPD will describe what specific gender transition coverages you have opted into.
 - The third document needed is a sample of your employee benefits materials that clearly describes what is covered. This should be different than your Summary Plan Documentation. Examples of this may include slides from a benefits presentation, an LGBTQ+ benefits guide, or other materials given to the employee that explicitly state the availability of these benefits.

National LGBTQ+ Healthcare Equality Index
Human Rights Campaign Foundation
Web: www.hrc.org/hej
Email: hej@hrc.org

From: Niebuhr, Janet <janet-niebuhr@uiowa.edu>
Sent: Thursday, September 7, 2023 1:53 PM
To: Healthcare Equality Index <hej@hrc.org>
Subject: University of Iowa - assistance requested

Good afternoon HEI,

Last survey we were docked for not providing an insurance bulletin. Would these items fulfill that requirement? Thank you. I appreciate your assistance.

Janet Niebuhr, MOL

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