

EXHIBIT 20

Message

From: Gallegos, Heather K [heather_gallegos@uhc.com]
on behalf of Gallegos, Heather K <heather_gallegos@uhc.com> [heather_gallegos@uhc.com]
Sent: 11/3/2015 12:39:57 PM
To: Marie Isaacson (Marie.Isaacson@azdoa.gov) [Marie.Isaacson@azdoa.gov]
CC: Yvette Medina (Yvette.Medina@azdoa.gov) [Yvette.Medina@azdoa.gov]; Chanelle Bergren (Chanelle.Bergren@azdoa.gov) [Chanelle.Bergren@azdoa.gov]; Elizabeth Schafer (Elizabeth.Schafer@azdoa.gov) [Elizabeth.Schafer@azdoa.gov]; 'michael.meisner@azdoa.gov' (michael.meisner@azdoa.gov) [michael.meisner@azdoa.gov]; Kelly Sharritts (Kelly.Sharritts@azdoa.gov) [Kelly.Sharritts@azdoa.gov]; Clatterbuck, Amy H [amy_h_clatterbuck@uhc.com]; Gallegos, Heather K [heather_gallegos@uhc.com]
Subject: RE: Transgender Reassignment

Marie,

I wanted to provide follow up on this. I have found that we have several large ASO customers that are electing to cover this ranging from 35,000 – 71,000 members. Customers are covering both surgical and non-surgical services. State of Colorado is one of our customers that is now covering this. So far, we have found that there has been minimal claim impact on this benefit. In addition, we have another ASO customer that has had no surgical claim experience since implementing this benefit in 2014.

I have provided coverage criteria that has been implemented for this benefit below:

The Covered Person must meet all of the following eligibility qualifications for genital surgery and/or surgery to change specified secondary sex characteristics (in addition to the plan's overall eligibility requirements as shown in the plan document):

1. The surgery must be performed by a qualified provider at a facility with a history of treating individuals with gender identity disorder;
2. The treatment plan must conform to the World Professional Association for Transgender Health Association (WPATH) standards (WPATH 6th edition)*;
3. The Covered Person must be age 18 years or older for irreversible surgical interventions;
4. The Covered Person must complete 12 months of successful continuous full time real life experience in the desired gender;
5. The Covered Person may be required to complete continuous hormone therapy (for those without contraindications). In consultation with the patients physician, this should be determined on a case-by-case basis through the Notification process.

Note the following clarifications:

- A biologic female patient that is only requesting a bilateral mastectomy does not need to complete hormone therapy in order to qualify for the mastectomy. However, UnitedHealthcare recommends that the patient complete at least 3 months of psychotherapy before having the mastectomy. (Note: WPATH Version 6 recommends that the patient complete 3 months of psychotherapy and/or 3 months of hormone therapy.)
- A biologic male patient that is able to take female hormones and is considering breast augmentation surgery should take the female hormones for at least 18 months before being considered for bilateral breast augmentation since the patient may achieve adequate breast development without surgery.

Please let me know if you have any questions or need additional information.

Thanks,
Heather

Heather K. Gallegos

Senior Account Manager, Client Management
UnitedHealthcare National Accounts
1 E. Washington St., Ste. 1700 AZ009-17TW, Phoenix, AZ 85004
(w) 602-255-8525 (m) 602-451-9867
Heather_K_Gallegos@uhc.com

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From: Gallegos, Heather K

Sent: Tuesday, October 27, 2015 12:11 PM

To: Marie Isaacson; Yvette Medina

Cc: Chanelle Bergren; Elizabeth Schafer; Clatterbuck, Amy H; Michael Meisner; Kelly Sharritts; Gallegos, Heather K

Subject: RE: Transgender Reassignment

Marie,

I am currently researching this and will provide follow up.

Thanks,

Heather

Heather K. Gallegos

Senior Account Manager, Client Management
UnitedHealthcare National Accounts
1 E. Washington St., Ste. 1700 AZ009-17TW, Phoenix, AZ 85004
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From: Marie Isaacson [<mailto:Marie.Isaacson@azdoa.gov>]

Sent: Tuesday, October 27, 2015 10:18 AM

To: Gallegos, Heather K; Yvette Medina

Cc: Chanelle Bergren; Elizabeth Schafer; Clatterbuck, Amy H; Michael Meisner; Kelly Sharritts

Subject: RE: Transgender Reassignment

Heather,

Can you let us know which other large public sector groups cover this; do they cover just non-surgical treatment for gender dysphonia or both non-surgical and surgical treatment? If you cannot provide the public employer, can you provide the size of the employer?

Thank you,

Marie

Marie Isaacson

Benefits Director, State of Arizona
ADOA – Benefits Services Division
100 North 15th Avenue, Suite 103, Phoenix, AZ 85007
p: 602-542-7367 | m: 602-526-5129 | marie.isaacson@azdoa.gov | <https://benefitoptions.az.gov/>

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<https://www.surveymonkey.com/r/VOCBenefits>

From: Gallegos, Heather K [mailto:heather_gallegos@uhc.com]
Sent: Friday, October 02, 2015 8:46 AM
To: Yvette Medina
Cc: Chanelle Bergren; Marie Isaacson; Elizabeth Schafer; Clatterbuck, Amy H; Gallegos, Heather K
Subject: RE: Transgender Reassignment

Yvette,

I wanted to provide additional follow up on this. We do have other large public sector groups that are beginning to cover these services. We have been advised that the estimated impact to costs is 0.5%. Please let me know if there are any questions or if you need additional information.

Thanks,
Heather

Heather K. Gallegos | Senior Account Manager, Client Management
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From: Gallegos, Heather K
Sent: Thursday, October 01, 2015 9:42 AM
To: 'Yvette Medina'
Cc: Chanelle Bergren; Marie Isaacson; Elizabeth Schafer; Clatterbuck, Amy H; Gallegos, Heather K
Subject: RE: Transgender Reassignment

Yvette,

Attached are the requested coverage determination guidelines for gender identity disorder. This document also references hormone replacement therapy for non-surgical treatment of gender dysphoria. Most plans exclude coverage. However, certain self-funded plans may include a benefit that covers surgical treatment for gender dysphoria.

Please let me know if there are any questions or if additional information is needed.

Thanks,
Heather

Heather K. Gallegos | Senior Account Manager, Client Management
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From: Yvette Medina [<mailto:Yvette.Medina@azdoa.gov>]
Sent: Wednesday, September 30, 2015 12:56 PM
To: Dash, Jay A; Branson Cobb; Maddalena, Diana M 654; Emmons, Erica 654 (Erica.Emmons@Cigna.com); Clatterbuck, Amy H; Gallegos, Heather K; Severns, Colette (Colette.Severns@azblue.com); Muth, Ken (Ken.Muth@azblue.com)
Cc: Chanelle Bergren; Marie Isaacson; Elizabeth Schafer
Subject: Transgender Reassignment

We are seeking additional information regarding Transgender Reassignment Surgery. Based on your book of business, are other health plans covering this procedure or looking to adding coverage? Please provide your coverage guidelines and response by Monday, October 5th. Let me know if you have any questions. Thank you.

Yvette

Yvette Medina

Plan Administrator

ADOA – Benefit Services Division | State of Arizona

100 North 15th Avenue, Suite 103, Phoenix, AZ 85007

p: 602-364-0568 | f: 602-542-4048 | yvette.medina@azdoa.gov

<http://benefitoptions.az.gov/>

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EXHIBIT 21

Message

From: Marie Isaacson [Marie.Isaacson@azdoa.gov]
on behalf of Marie Isaacson <Marie.Isaacson@azdoa.gov> [Marie.Isaacson@azdoa.gov]
Sent: 10/25/2015 1:25:00 PM
To: Yvette Medina [Yvette.Medina@azdoa.gov]; Dash, Jay A [DashJ@aetna.com]; Branson Cobb [CobbB@AETNA.com]; Maddalena, Diana M 654 [Diana.Maddalena@Cigna.com]; Emmons, Erica 654 (Erica.Emmons@Cigna.com) [Erica.Emmons@Cigna.com]; Amy Clatterbuck [amy_h_clatterbuck@uhc.com]; Heather Gallegos [heather_gallegos@uhc.com]; Severns, Colette (Colette.Severns@azblue.com) [Colette.Severns@azblue.com]; Muth, Ken (Ken.Muth@azblue.com) [Ken.Muth@azblue.com]
CC: Chanelle Bergren [Chanelle.Bergren@azdoa.gov]; Elizabeth Schafer [Elizabeth.Schafer@azdoa.gov]
Subject: RE: Transgender Reassignment

All,

As you are probably aware, the HHS issued a proposed rule on Section 1557 of the ACA. Section 1557 prohibits discrimination. It is open for comment through November. For your convenience, the link to the proposed rule is below:

<https://www.federalregister.gov/articles/2015/09/08/2015-22043/nondiscrimination-in-health-programs-and-activities>

Please advise how you believe this rule, if passed as proposed, will impact your business and its impact to the State under our current contracts with your organization.

Thank you,
Marie

Marie Isaacson

Benefits Director, State of Arizona
ADOA – Benefits Services Division
100 North 15th Avenue, Suite 103, Phoenix, AZ 85007
p: 602-542-7367 | m: 602-526-5129 | marie.isaacson@azdoa.gov | <https://benefitoptions.az.gov/>

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From: Yvette Medina
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Yvette

Yvette Medina

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