

**Comments of Harvard Pilgrim Health Care
Rule Chapter 865 – Standards for Fertility Coverage
Maine Bureau of Insurance
June 30, 2023**

Thank you for the opportunity to present comments on proposed Rule Chapter 865, Standards for Fertility Coverage, on behalf of Harvard Pilgrim Health Care, a Point32Health Company.

We have a few questions below to share with the Bureau.

Section 4: Coverage Requirements

- Clarification for mandated coverage of donor eggs/sperm. In Section 6; 3C do we need to cover the procurement of the donor eggs/sperm?

Section 5: Required Benefits

- #4 – need additional guidance on fresh and frozen embryo transfers.
 - Who is the transfer this is written for?
 - How does it differ from #8 – which covers IVF, including IVF using donor eggs or embryo being transferred to gestational carrier/surrogate?

Section 6: Permissible Benefit Limitations and Exclusions

- #3B – Are we required to cover medical services for a gestational carrier not covered by HPHC insurance?