



April 9, 2026

Chair Koegel, Chair O'Driscoll and members of the committee:

On behalf of the Minnesota Chamber of Commerce, representing more than 6,300 businesses of all sizes and industries across the state, we write to provide feedback on HF 1758 (Rep. Kotyza-Witthuhn), which would mandate coverage for fertility treatment in the fully insured market.

We are not taking a position on the merits of expanding access to fertility treatment. However, as with any new health insurance mandate, there are associated costs that directly impact employers' ability to provide affordable coverage to their employees. Based on a prior actuarial review conducted by the Minnesota Department of Commerce of similar legislation, the estimated impact of an infertility treatment mandate is \$1.30 per member per month in the first year, increasing to \$2.20 over time. Applied across Minnesota's fully insured market, this equates to approximately \$16.7 million in additional costs in the first year, growing to more than \$28 million annually. The Minnesota Council of Health plans estimate the costs to be higher – on average \$12 per member per month, or \$154.4 million in cost to the fully insured market.

Although the bill includes a defrayal provision, that requirement applies only to the individual and small group markets. While defrayal shifts a portion of the cost to the state, the mandate will still be reflected in premiums across the fully insured market. As a result, employers and employees—particularly in the fully insured large group market—will bear a significant share of the premium impact.

We encourage continued restraint when considering new health insurance mandates, particularly as employers face ongoing cost pressures in providing coverage. Affordability remains one of the most significant challenges facing Minnesota businesses and their employees, and sustained premium increases place pressure on hiring decisions, wage growth, and long-term investment. Should the Legislature choose to advance additional mandates, we encourage consideration of HF 400 (Rep. Perryman), bipartisan legislation that would establish a broader framework for addressing the cost of new mandates across fully insured markets and help ensure that well-intended policy decisions do not inadvertently increase the cost of coverage.

Thank you for your consideration.

Sincerely,

Jonathan Cotter  
Director, Health Care and Commerce Policy  
Minnesota Chamber of Commerce