



## Fiscal Impact Statement

### Legislative Council Staff

Nonpartisan Services for Colorado's Legislature

## INITIATIVE 110: PROHIBIT CERTAIN SURGERIES ON MINORS

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**Date:** September 9, 2025

### Summary Information

**Overview.** The measure prohibits a health care professional from performing surgery on a minor to alter biological sex characteristics.

**Types of impacts.** The measure is projected to affect the following areas:

- Minimal State Expenditures
- Minimal State Revenue

**Disclaimer.** This initial fiscal impact statement has been prepared for an initiative approved for petition circulation by the Secretary of State. If the initiative is placed on the ballot, Legislative Council Staff may revise this estimate for the ballot information booklet (Blue Book) if new information becomes available. Any appropriations required to implement this measure will be addressed through the annual or supplemental budget process if this measure is approved by voters.

**Table 1**  
**State Fiscal Impacts**

Type of Impact	Budget Year FY 2026-27	Out Year FY 2027-28
State Revenue	\$0	\$0
State Expenditures	\$0	\$0
Transferred Funds	\$0	\$0
Change in TABOR Refunds	\$0	\$0
Change in State FTE	0.0 FTE	0.0 FTE

## Summary of Measure

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The measure prohibits a health care professional from performing surgery on anyone under 18 years old in response to their perception of sex or gender unless they have a medically verifiable disorder of sex development. The measure prohibits the state government and insurance carriers from paying for these surgeries.

## Background

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On June 20, 2025, the Centers for Medicare and Medicaid [issued a rule](#) removing sex-trait modification, known as gender-affirming care, from the federal list of Essential Health Benefits. Therefore, the Department of Health Care Policy and Financing (HCPF) is no longer required to cover these services.

## State Revenue

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To the extent that the bill results in additional complaints being filed against regulated medical professionals, or that these complaints result in administrative actions or fines, workload and revenue may increase in the Department of Regulatory Agencies (DORA) and the Judicial Department. Given that regulated professionals are assumed to have a high level of compliance, any impact is anticipated to be minimal.

## State Expenditures

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The bill potentially decreases costs for HCPF and state employee insurance and minimally affects workload in DORA and the Judicial Department.

## Department of Health Care Policy and Financing

The bill potentially decreases costs in HCPF for Medicaid to no longer cover certain surgeries for minors related to gender perception. Given recent data on utilization by minors through Medicaid, these savings are expected to be minimal. Any savings will be addressed through the annual budget process.

## State Employee Insurance

The bill potentially decreases costs in state agencies for state employee health plans to no longer cover certain surgeries for minors related to gender perception. This may result in a decrease in insurance premiums paid by state agencies. Given recent data on utilization by minors, these savings are expected to be minimal. Any savings will be addressed through the annual budget process based on any adjustment to premiums made by insurers and the future share of premiums that is paid by the state and by employees.

## Department of Regulatory Agencies

The bill will increase workload for the Division of Insurance, the State Medical Board, and other mental health professional boards in DORA to update materials, conduct outreach, and to promulgate rules; no change in appropriations is required. Workload may also increase to the extent that complaints against regulated professionals and insurance carriers increase. The fiscal note assumes that regulated professionals and insurance carriers will comply with the law.

## Judicial Department

The Judicial Department may handle additional civil cases if any individuals or entities do not comply with the bill. Since DORA regulates most affected medical providers and insurance carriers, the fiscal note assumes trial court workload will be minimal.

## Local Governments

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Similar to the state, local governments may have reduced premium costs for employee health insurance to the extent the prohibition under the bill lowers utilization of certain surgeries by minors covered on these plans. Overall, this impact is expected to be minimal.

## Effective Date

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If approved by voters at the 2026 general election, this measure takes effect on January 1, 2027.

## State and Local Government Contacts

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Health Care Policy and Financing  
Law  
Personnel

Public Health and Environment  
Regulatory Agencies