

Below is our suggested comment text. You are welcome to use it as a template, and we encourage you to add personal details instead of the text that we've marked in purple. If you choose to write your own text, it is important to keep comments direct, factual, courteous, specific, and constructive. Make sure your comment includes who you are, why this issue matters, how this ruling will impact you, and what you want them to do about it.

Know that if you submit a comment, it, and the identifying information that you provide (such as your name and email address) will become part of the public record. You can submit using a fake name and email.

To the Florida Boards of Medicine and Osteopathic Medicine,

I am a <describe your primary association with gender affirming care for youth and/or Florida (bonus points for being a Florida resident).>

I am writing to strongly condemn the Florida Board of Medicine's proposed rule on practice standards for the treatment of gender dysphoria (64BS-9.019 Standards of Practice for the Treatment of Gender Dysphoria in Minors).

The rule draft as written is not based on the current standards of care for transgender youth as agreed upon by the majority of the relevant medical and professional organizations

American Academy of Pediatrics
The Endocrine Society
The Pediatric Endocrine Society
American Academy of Child and Adolescent Psychiatry
American Academy of Family Physicians
American College of Obstetricians and Gynecologists
American College of Physicians
American Medical Association
American Osteopathic Association
American Psychiatric Association
American Public Health Association
World Professional Association For Transgender Health

In addition, the body of evidence supporting gender affirming care for youth with gender dysphoria is strong and growing:

Tordoff, D. M., Wanta, J. W., Collin, A., Stephney, C., Inwards-Breland, D. J., Ahrens, K. (2022) Mental Health Outcomes in Transgender and Nonbinary Youths Receiving iGender-Affirming Care. JAMA Network Open, 5(2), e220978.

Turban, J. L., King, D., Kobe, J., Reisner, S. L., & Keuroghlian, A. S. (2022). Access to gender-affirming hormones during adolescence and mental health outcomes among transgender adults. PLOS ONE, 17(1), e0261039. <https://doi.org/10.1371/journal.pone.0261039>

Carmichael, P., Butler, G., Masic, U., Cole, T. J., De Stavola, B. L., Davidson, S., Skageberg, E. M., Khadr, S., & Viner, R. M. (2021). Short-term outcomes of pubertal suppression in a selected cohort of 12 to 15 year old young people with persistent gender dysphoria in the UK. PLOS ONE, 16(2), e0243894. <https://doi.org/10.1371/journal.pone.0243894>

Grannis C, Leibowitz SF, Gahn S, Nahata L, Morningstar M, Mattson WI, Chen D, Strang JF, Nelson EE. Testosterone treatment, internalizing symptoms, and body image dissatisfaction in transgender boys. *Psychoneuroendocrinology*. 2021 Oct;132:105358. doi: 10.1016/j.psyneuen.2021.105358. Epub 2021 Jul 17. PMID: 34333318.

Green, A. E., DeChants, J. P., Price, M. N., & Davis, C. K. (2021). Association of gender-affirming hormone therapy with depression, thoughts of suicide, and attempted suicide among transgender and nonbinary youth. *Journal of Adolescent Health*.

Nieder TO, Mayer TK, Hinz S, Fahrenkrug S, Herrmann L, Becker-Hebly I. Individual Treatment Progress Predicts Satisfaction With Transition-Related Care for Youth With Gender Dysphoria: A Prospective Clinical Cohort Study. *J Sex Med*. 2021 Mar;18(3):632-645. doi: 10.1016/j.jsxm.2020.12.010. Epub 2021 Feb 26. PMID: 33642235.

Turban JL, King D, Carswell JM, Keuroghlian AS. Pubertal Suppression for Transgender Youth and Risk of Suicidal Ideation [published correction appears in *Pediatrics*. 2021 Apr;147(4):]. *Pediatrics*. 2020;145(2):e20191725. doi:10.1542/peds.2019-1725

Achille, C., Taggart, T., Eaton, N. R., Osipoff, J., Tafuri, K., Lane, A., & Wilson, T. A. (2020). Longitudinal impact of gender-affirming endocrine intervention on the mental health and well-being of transgender youths: preliminary results. *International Journal of Pediatric Endocrinology*, 2020(1), 1-5.

Becker-Hebly I, Fahrenkrug S, Champion F, Richter-Appelt H, Schulte-Markwort M, Barkmann C. Psychosocial health in adolescents and young adults with gender dysphoria before and after gender-affirming medical interventions: a descriptive study from the Hamburg Gender Identity Service. *Eur Child Adolesc Psychiatry*. 2021 Nov;30(11):1755-1767. doi: 10.1007/s00787-020-01640-2. Epub 2020 Sep 29. PMID: 32990772.

de Lara, D. L., Rodríguez, O. P., Flores, I. C., Masa, J. L. P., Campos-Muñoz, L., Hernández, M. C., & Amador, J. T. R. (2020). Psychosocial assessment in transgender adolescents. *Anales de Pediatría (English Edition)*, 93(1), 41-48.

Anna I.R. van der Miesen, Thomas D. Steensma, Annelou L.C. de Vries, Henny Bos, Arne Popma, Psychological Functioning in Transgender Adolescents Before and After Gender-Affirmative Care Compared With Cisgender General Population Peers, *Journal of Adolescent Health*, Volume 66, Issue 6, 2020, Pages 699-704, ISSN 1054-139X, <https://doi.org/10.1016/j.jadohealth.2019.12.018>.

Hodax JK, Wagner J, Sackett-Taylor AC, Rafferty J, Forcier M. Medical Options for Care of Gender Diverse and Transgender Youth. *J Pediatr Adolesc Gynecol*. 2020 Feb;33(1):3-9. doi: 10.1016/j.jpag.2019.05.010. Epub 2019 May 30. PMID: 31154017.

Kaltiala, R., Heino, E., Työläjärvi, M., & Suomalainen, L. (2020). Adolescent development and psychosocial functioning after starting cross-sex hormones for gender dysphoria. *Nordic Journal of Psychiatry*, 74(3), 213-219.

Kuper, L. , L. E., Stewart, S., Preston, S., Lau, M., & Lopez, X. (2020). Body dissatisfaction and mental health outcomes of youth on gender-affirming hormone therapy. *Pediatrics*, 145(4).

Allen, L. R., Watson, L. B., Egan, A. M., & Moser, C. N. (2019). Well-being and suicidality among transgender youth after gender-affirming hormones. *Clinical Practice in Pediatric Psychology*, 7(3), 302.

Kimberly LL, Folkers KM, Friesen P, Sultan D, Quinn GP, Bateman-House A, Parent B, Konnoth C, Janssen A, Shah LD, Bluebond-Langner R, Salas-Humara C. Ethical Issues in Gender-Affirming Care for Youth. *Pediatrics*. 2018 Dec;142(6):e20181537. doi: 10.1542/peds.2018-1537. Epub 2018 Nov 6. PMID: 30401789.

Wiepjes CM, Nota NM, de Blok CJM, et al. The Amsterdam Cohort of Gender Dysphoria Study (1972-2015): trends in prevalence, treatment, and regrets. *J Sex Med*. 2018;15(4):582-590.

Simone Mahfouda, Julia K Moore, Aris Siafarikas, Florian D Zepf, Ashleigh Lin, Puberty suppression in transgender children and adolescents, *The Lancet Diabetes & Endocrinology*, Volume 5, Issue 10, 2017, Pages 816-826, ISSN 2213-8587, [https://doi.org/10.1016/S2213-8587\(17\)30099-2](https://doi.org/10.1016/S2213-8587(17)30099-2).

Costa R, Dunsford M, Skagerberg E, Holt V, Carmichael P, Colizzi M. Psychological Support, Puberty Suppression, and Psychosocial Functioning in Adolescents with Gender Dysphoria. *J Sex Med*. 2015 Nov;12(11):2206-14. doi: 10.1111/jsm.13034. Epub 2015 Nov 9. PMID: 26556015.

De Vries, A. L., McGuire, J. K., Steensma, T. D., Wagenaar, E. C., Doreleijers, T. A., & Cohen-Kettenis, P. T. (2014). Young adult psychological outcome after puberty suppression and gender reassignment. *Pediatrics*, 134(4), 696-704.

de Vries AL, Steensma TD, Doreleijers TA, Cohen-Kettenis PT. Puberty suppression in adolescents with gender identity disorder: a prospective follow-up study. *J Sex Med*. 2011 Aug;8(8):2276-83. doi: 10.1111/j.1743-6109.2010.01943.x. Epub 2010 Jul 14. PMID: 20646177.

The proposed rule changes to prohibit initiation of gender affirming care, including the use of blockers, hormones, and/or medical procedures will harm Florida youth. It is in opposition to existing guidelines and clinical knowledge. 29 major medical organizations have statements indicating gender affirming care is medically necessary.

< insert statement of your work or personal experience with gender affirming care for youth >

I urge you to vote against the adoption of Rules 64B8-9.019 & 64B15-14.014.

Thank you for your time and attention.

<your signature>