

To: Karen Winkel, Lisa Emerson and Brooke Hall

Re: HB2002 Draft Rule

Specifically: "Accepted standards of care" includes, at a minimum and without limitation, the World Professional Association for Transgender Health's Standards of Care for Transgender and Gender Diverse People, Version 8, which is incorporated as Exhibit 1 to this rule."

I am contacting you respectfully with regard to the World Professional Association for Transgender Health's Standards of Care for Transgender and Gender Diverse People, Version 8, (WPATH SOC8) as it does not represent medical or mental health consensus in the US or worldwide. [WPATH](#) itself, despite misleading language, clarifies that SOC8 is NOT an actual standard/set of standards of care, but are treatment **recommendations** made by the organization.

WPATH SOC8 ignore actual fundamental standards of care in medicine, scientific research and mental health that must also be considered. Additionally, WPATH has been heavily scrutinized due to continued disregard of independent systematic reviews concluding evidence for multiple gender-affirming interventions is low to very low quality – certainly not in line with medical or mental health standards of care.

Most recently, from this [article](#):

"WPATH's unrivalled status as expert legal opinion has been summarily rejected in a key case heard at the 6th Circuit Appeal Court in the US, which may well now proceed to the US Supreme Court for further resolution (Jenkins, 2023). In the UK, the Interim Cass Review (2022) has found against the Tavistock Gender Identity Development Service model of care, which was arguably closely influenced by and aligned with WPATH Standards of Care."

I appreciate your consideration,

Sincerely,

Lauren H. Schwartz, MD, FAPA