

The Cost of Expressing Gender Identity in America

Introduction

Although genetics determine an individual's biological sex, gender has more to do with how a person feels internally. This explains why there has been a global increase in gender identity issues. Gender identity entails internal sentiments of identity and how these feelings are expressed externally. Women have historically been associated with femininity and men with masculinity, but these social conventions have progressed with the times, and gender is no longer limited to the construct of being a man or a woman. Gender has evolved to include, but is not limited to, individuals who identify as transgender, gender neutral, agender, non-binary, pangender, genderqueer, third gender, and two-spirit, as well as any combination of these identities.¹ With these various forms of gender identity comes the need for gender expression and a presentation of how these individuals would like the world to perceive them. While some communities have been accepting of these diverse gender identities, others have remained inflexible and intolerant of gender identities outside of the male and female binary. These rejections are based on personal convictions, not scientific evidence. In America, expressing gender identity often leads to harassment, discrimination, and violence. The country has made strides to combat discrimination on the basis of gender identity, but there remain constant attacks by courts and legislators with anti-trans agendas, particularly at the state level.

Evolving Understandings of Gender Identity

Gender dysphoria refers to the distressing emotions experienced by those whose biological sex and gender identity are in conflict. Prior to this, however, such individuals were diagnosed

¹ "Gender Diversity Terminology | Penn State Student Affairs." n.d. Studentaffairs.psu.edu. <https://studentaffairs.psu.edu/csgd/explore-lgbtq-resources/identity-based/gender-terms>.

with mental illness and referred to as having a gender identity disorder.² In the past, common law, which allowed individuals to change their name for any reason other than a wrongful or fraudulent one, failed to protect gender dysphoric individuals from discrimination. In *Matter of Anonymous v. Weiner*, 50 Misc.2d 380 (1966), the court ruled against changing the name and gender on a transgender person's birth certificate. This was the first case of transgenderism in the U.S. in which the petitioner sought to compel the New York City Health Department to issue a new birth certificate following their initial refusal. This case illustrates how the law initially failed to protect transgender individuals from discrimination based on their gender identity. The decision held that sexual transformation was not a valid reason for altering official documents, an indirect rejection of an individual's gender identity.

The pathologizing of gender identity has significantly impacted jurisprudence.³ When the law narrowly defines gender based on what somebody was assigned at birth, it makes it difficult for affected individuals to lead fulfilling lives. This outdated approach continues to restrict transgender individuals' rights, as they continue to experience discrimination in healthcare access, housing, access to social security, and movement.⁴ In the case of *Grossman v. Bernards Township Board of Education*, 429 U.S. 897 (1976), the Supreme Court denied Paula Grossman's appeal alleging her wrongful dismissal as a music instructor for openly identifying as transgender. This case exemplifies how the legal system failed transgender persons in their pursuit of legal identity. The unwillingness of the justice system to recognize gender outside of the traditional binary construct has made it difficult for the transgender community and communities of other sexual

² Zucker, Kenneth J., and Susan J. Bradley. *Gender Identity Disorder and Psychosexual Problems in Children and Adolescents*. Guilford Press, 1995.

³ "The Struggle of Trans and Gender-Diverse Persons." U.N. Office of High Commissioner for Human Rights. Accessed April 9, 2023. <https://www.ohchr.org/en/special-procedures/ie-sexual-orientation-and-gender-identity/struggle-trans-and-gender-diverse-persons>.

⁴ *Id.*

identities to obtain equal opportunities. States have asserted that they embrace and recognize diverse gender identities, but the requirement of medical certifications continues to expose transgender individuals to discrimination. Medical certifications are approvals from healthcare providers that qualify transgender individuals for FMLA leave eligibility. Transgender individuals may not be eligible for these leaves unless they provide supporting documentation. *Bostock v. Clayton County, Georgia*, 140 S. Ct. 1731 (2020) made it plain that transgender persons are legally protected against workplace discrimination, and this should offer guidance for employers to treat transgender people equally. Therefore, despite the progress made in court cases supporting their rights, the lack of concrete legislative protection makes it difficult for transgender people to be free from discrimination.

Individuals' private sentiments regarding their gender identity should not be subjected to external scrutiny. State and federal interference in gender identity matters in the past is analogous to invading privacy and regulating such conduct. Because their sexual identities are a matter of personal sentiment, all that transgender individuals desire is to enjoy the same rights and freedoms as others without interference from lawmakers. But because of the legal vulnerability of transgender individuals, legislators have seized opportunities to promote anti-trans legislation and policies.⁵ The transgender community continues to fight against these anti-trans laws, which are viewed as an invasion of privacy and personal affairs. The State of Alaska, for instance, introduced a bill concerning school athletics, recreation, athletic teams, and sports.⁶ Under this measure, student teams may consist only of males or females based on their biological sex at birth. This

⁵ Thoreson, Ryan. “All We Want Is Equality.” Human Rights Watch, March 28, 2023. <https://www.hrw.org/report/2018/02/19/all-we-want-equality/religious-exemptions-and-discrimination-against-lgbt-people>.

⁶ Maguire, Sean. 2022. “Alaska Senate Committee Advances Transgender Sports Bill for K-12 Students.” <https://www.alaskasnews.com>. May 3, 2022. <https://www.alaskasnews.com/2022/05/03/alaska-senate-committee-advances-transgender-sports-bill-k-12-students/>.

inherently excludes transgender students from such school activities, as their gender and anatomical sex may not coincide.

Statistics on American Public Opinion

Research shows that 1.6% of U.S. adults identify as transgender or nonbinary.⁷ With an increase in the number of individuals identifying with this community, there is also a rise in trans-related discrimination. Moreover, research reveals that 64% of Americans strongly support the protection of transgender individuals from discrimination, while 10% continue to oppose such a move.⁸ This demonstrates that there is still work to be done to attain transgender acceptance among Americans. Nonetheless, some Americans continue to assume that gender is determined by the sex designated at birth, disregarding the diversity of gender.⁹ These beliefs align with attitudes regarding the treatment of transgender individuals. Those who insist that gender is determined by the sex assigned at birth believe that these individuals should be treated accordingly and are likely to neglect their emotions or rights.

Access to Healthcare

Statistics indicate that transgender individuals have a particularly difficult time gaining access to healthcare facilities due to gender-based health disparities.¹⁰ These challenges range from

⁷ Mitchell, Travis. "The Experiences, Challenges, and Hopes of Transgender and Nonbinary U.S. Adults." Pew Research Center's Social & Demographic Trends Project. Pew Research Center, November 9, 2022. <https://www.pewresearch.org/social-trends/2022/06/07/the-experiences-challenges-and-hopes-of-transgender-and-nonbinary-u-s-adults/>.

⁸ Mitchell, Travis. "Americans' Complex Views on Gender Identity and Transgender Issues." Pew Research Center's Social & Demographic Trends Project. Pew Research Center, June 28, 2022. <https://www.pewresearch.org/social-trends/2022/06/28/americans-complex-views-on-gender-identity-and-transgender-issues/>.

⁹ Mitchell, Travis. "The Experiences, Challenges, and Hopes of Transgender and Nonbinary U.S. Adults." Pew Research Center's Social & Demographic Trends Project. Pew Research Center, November 9, 2022. <https://www.pewresearch.org/social-trends/2022/06/07/the-experiences-challenges-and-hopes-of-transgender-and-nonbinary-u-s-adults/>.

¹⁰ Safer, Joshua D., Eli Coleman, Jamie Feldman, Robert Garofalo, Wylie Hembree, Asa Radix, and Jae Sevelius. "Barriers to Healthcare for Transgender Individuals." *Current Opinion in Endocrinology, Diabetes & Obesity* 23, no. 2 (2016): 168–71. <https://doi.org/10.1097/med.0000000000000227>.

common healthcare issues to gender-affirming care. *Minton v. Dignity Health*, 252 Cal. Rptr. 3d 616 (Cal. App. 1st Dist. 2019) is a case example of how healthcare facilities continue to violate the rights of transgender people to access healthcare services. Evan Minton was denied medical care on the basis of his gender identity, which constitutes sex discrimination. The hospital's decision to challenge its decision in court is a clear indication of how intolerant people still are of diverse gender identities. Fortunately for Minton, the court ruled in his favor, establishing a provision of healthcare services to transgender individuals. However, transgender individuals in many cases outside California still lack access to providers who comprehend the concept of sexual identities and are willing to provide services with an open mind, which creates barriers to healthcare.¹¹ Therefore, while *Minton* prohibits California healthcare providers from discriminating against their patients based on their gender identities, the absence of concrete federal legislation enables discriminating parties to tiptoe around or create grey areas in this matter.

In addition to sociological factors, transgender individuals face structural barriers to healthcare access.¹² Countless transgender individuals are uninsured, or their insurance does not cover gender-related services.¹³ Some states have enacted legislation prohibiting the exclusion of transgender individuals from health insurance. This is an achievement in over twenty-four states and the District of Columbia.¹⁴ Despite this progress, many states continue to deny transgender individuals access to healthcare. For instance, the governor of Arkansas signed a bill allowing

¹¹ *Id.*

¹² *Id.*

¹³ Warner, David Michael, and Arunab Harish Mehta. "Identifying and Addressing Barriers to Transgender Healthcare: Where We Are and What We Need to Do about It." *Journal of General Internal Medicine* 36, no. 11 (2021): 3559–61. <https://doi.org/10.1007/s11606-021-07001-2>.

¹⁴ DeMillo, Andrew. "Arkansas Governor Signs Bill Allowing Medical Workers to Refuse Treatment to LGBTQ+ People." PBS. Public Broadcasting Service, March 26, 2021. <https://www.pbs.org/newshour/politics/arkansas-governor-signs-bill-allowing-medical-workers-to-refuse-treatment-to-LGBTQ+-people>.

medical personnel to refuse treatment to LGBTQ+ patients.¹⁵ The bill was based on the moral or religious obligations of the practitioner and, therefore, permitted them to deny treatment to such individuals on these grounds. This is an example of how intrusive policies make life intolerable for transgender people. Arkansas law provides that healthcare employees and institutions are not required to act against their conscience to provide gender-affirming medical care to transgender patients, except in emergency situations.¹⁶ This action asserts that a person's gender identity affects the conscience and morals of others. The Human Rights Campaign and the American Civil Liberties Union have both opposed the law, claiming that it will encourage physicians to deny patients a variety of services based on their gender identities. Arkansas law allows healthcare providers to deny best-practice medical care for transgender adolescents and does not allow state employees to receive health benefits that are inclusive of transgender individuals.¹⁷ Such laws diminish the benefits that have thus far accrued to transgender individuals and policies. Laws that discriminate against transgender persons lead to worse health outcomes. The institutions intended to provide them with protection and prevent such forms of discrimination are the very ones that discriminate against them.

High rates of suicide and suicide attempts are prevalent among transgender individuals.¹⁸ The average rate of suicide attempts among transgender individuals is 32% -50% globally.¹⁹ This indicates the prevalence of mental health issues among transgender individuals. This high frequency can be at least partly attributed to the discrimination transgender people face in life,

¹⁵ DeMillo, 2021

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ Virupaksha, H. G., Daliboyina Muralidhar, and Jayashree Ramakrishna. "Suicide and Suicidal Behavior among Transgender Persons." *Indian Journal of Psychological Medicine* 38, no. 6 (2016): 505–9. <https://doi.org/10.4103/0253-7176.194908>.

¹⁹ *Id.*

particularly in regard to attaining gender-affirming care or proper mental health care. If they cannot access appropriate treatment, it only exacerbates their suffering, and they are more likely to develop suicidal tendencies. Transgender people are resilient, but these daily challenges expose them to more severe mental health issues. Recent surges in anti-trans legislation have been linked to increased search queries on suicide and related topics.²⁰ When a bill against transgender people was passed, the number of internet queries for depression and suicide increased but decreased when the bill was rejected.²¹ This speaks volumes about the connection between anti-trans legislation and the mental health of those affected. If they are denied healthcare access, they cannot manage their mental health requirements, and suicide becomes a chilling reality.

Discrimination Leading to Violence

According to a report by Human Rights Watch, transgender individuals are at a high risk of violence and discrimination.²² Transgender persons are vulnerable to violence from strangers and even acquaintances, relatives, and law enforcement. The police have been shown to target transgender individuals for criminalization as well as to minimize their hardships in society. An appalling example is when correctional officers at New York City's Rikers Island laughed as transgender woman Layleen Polanco's lifeless body rested in her cell as a result of the officers' choice not to conduct 15-minute-interval health check-ins.²³ This is a classic example of how transgender persons continue to be victimized by law enforcement. The District Attorney's office absolved the prison staff of any misconduct in relation to the case, denying justice to the late

²⁰ Staloch, Laura. "The Passage of Anti-Transgender Legislation Increases Internet Searches for 'Suicide' and 'Depression.'" PsyPost, January 29, 2023. <https://www.psypost.org/2023/01/the-passage-of-anti-transgender-legislation-increases-internet-searches-for-suicide-and-depression-67233>.

²¹ *Id.*

²² "United States: Transgender People at Risk of Violence." Human Rights Watch, November 25, 2021. <https://www.hrw.org/news/2021/11/18/united-states-transgender-people-risk-violence>.

²³ Burns, Katelyn. "Why Police Often Single out Trans People for Violence." Vox. Vox, June 23, 2020. <https://www.vox.com/identities/2020/6/23/21295432/police-black-trans-people-violence>.

Polanco.²⁴ This is one of the numerous instances in which the justice system perpetrates violence against transgender people and fails to protect them. The transgender community confronts pervasive violence from strangers, particularly in the form of hate crimes, in addition to law enforcement officers. This is frequently the result of hateful people imposing their beliefs and values on transgender individuals, and the perception that their actions are contrary to what is socially acceptable. The Trump administration's decision to eliminate certain transgender civil rights protections only aggravated an already problematic relationship between the transgender community and the justice system, and has been characterized as an attack on their fundamental rights.²⁵

Other Forms of Discrimination

Transgender bathroom access remains a contentious issue. The Obama administration had implemented policies to protect transgender students from discrimination, including requests that schools permit students to use locker rooms and restrooms that correspond with their gender identity.²⁶ As states filed lawsuits against the Obama administration, a move intended to advance the agenda of gender inclusivity became the subject of national debate. Anti-LGBTQ+ state campaigns were successful because, as soon as the Trump administration assumed office, the Obama-era protections were reversed.²⁷ This is a clear loss for the transgender community, and it raises an even more pressing issue: how have national legislators been reduced to discussing the

²⁴ *Id.*

²⁵ Sanger-Katz, Margot, and Noah Weiland. "Trump Administration Erases Transgender Civil Rights Protections in Health Care." *The New York Times*. *The New York Times*, June 12, 2020. <https://www.nytimes.com/2020/06/12/us/politics/trump-transgender-rights.html>.

²⁶ Lopez, German. "Anti-Transgender Bathroom Hysteria, Explained." *Vox*. *Vox*, May 5, 2016. <https://www.vox.com/2016/5/5/11592908/transgender-bathroom-laws-rights>.

²⁷ Sanger-Katz, Margot, and Noah Weiland. "Trump Administration Erases Transgender Civil Rights Protections in Health Care." *The New York Times*. *The New York Times*, June 12, 2020. <https://www.nytimes.com/2020/06/12/us/politics/trump-transgender-rights.html>.

bathroom preferences of individuals? Legislators' invasion of private affairs makes anti-trans conflict more personal and a means of imposing one set of beliefs over that of the transgender community.

In *Grimm v. Gloucester County Sch. Bd.*, 972 F.3d 586 (4th Cir. 2020), a high school student sued a county school in Virginia for prohibiting him from using the restroom that corresponded to his gender identity.²⁸ Evidence in that case showed that Gavin and other transgender students suffered physical and emotional harm by being forced to use the restroom of their biological sex. The Fourth Circuit concluded that the school board's restroom policy constituted sex-based discrimination and that transgender individuals constitute a quasi-suspect classification. However, it took the court six years to reach this decision, demonstrating how daunting and controversial transgender-related cases remain. While this case may have established a precedent for future cases, the Trump administration thereafter changed the policy of Title IX protections that was the foundation for the court's decision.²⁹ The case had to be relitigated at the lower courts and was eventually reaffirmed by the Fourth Circuit using the precedent of *Bostock*. The Supreme Court subsequently refused to hear the defendant's appeal. On one hand, the Court's refusal to grant *certiorari* left the positive ruling of the Fourth Circuit as law. However, the Court failing to hear this case and affirm the decision limits Grimm to the Fourth Circuit, leaving other circuit courts free to deny that this conduct constitutes discrimination.

²⁸ Hurley, Lawrence. "Transgender Student Wins as U.S. Supreme Court Rebuffs Bathroom Appeal." Reuters. Thomson Reuters, June 28, 2021. <https://www.reuters.com/world/us/us-supreme-court-declines-hear-transgender-school-bathroom-case-2021-06-28/>

²⁹ Sanger-Katz, et al., "Trump erases transgender rights."

The government's involvement with transgender issues remains highly visible. The Biden administration has been at the forefront of the battle for LGBTQ+ rights.³⁰ This administration enacted regulations to ensure that transgender individuals in schools and workplaces have access to locker rooms and restrooms that correspond with their gender identity. However, a federal judge in Tennessee temporarily halted this policy.³¹ Such disputes demonstrate how far the LGBTQ+ community is from obtaining their rights and unequivocal protection. These types of actions by the judicial system go against the principles of the First Amendment. By revoking the rights of transgender people, it infringes on the constitutional rights of the LGBTQ+ community and makes it difficult for them to express their gender identity freely.

Employment Discrimination

Title VII of the Civil Rights Act of 1964 prohibits discrimination based on an individual's gender identity. In *Bostock*, the Supreme Court ruled that all citizens in all states who work for or apply for a position with an employer with at least fifteen employees continue to be protected from gender identity-based employment discrimination under federal law. It took many years, but transgender individuals now enjoy freedom from employment discrimination based on their gender identity. What remains perplexing, however, is why individuals' sex or gender identity is even an issue, particularly when their gender has no bearing on the nature of the work. As LGBTQ+ employment protection laws serve to uphold anti-discrimination mandates, they may be limited.

³⁰Avery, Dan. "Biden Signs Foreign Policy Memo Putting U.S. at 'Forefront' of Global LGBTQ Rights." NBCNews.com. NBCUniversal News Group, February 5, 2021. <https://www.nbcnews.com/feature/nbc-out/biden-signs-foreign-policy-memo-putting-u-s-forefront-global-n1256848>.

³¹Larson, Erik. "Judge Blocks Biden Rules for Trans Access to Bathrooms, Sports." Bloomberg.com. Bloomberg, July 17, 2022. <https://www.bloomberg.com/news/articles/2022-07-17/judge-blocks-biden-rules-for-trans-access-to-bathrooms-sports#xj4y7vzkg>.

Consequently, balanced, concrete codification of the Supreme Court decision is necessary to ensure that no individual is harmed in the process of protecting their rights.

Rights of Minors

Minors are targeted in the ongoing anti-trans conflict in the United States. Over 150 pieces of legislation targeting transgender Americans were proposed in 2022, of which around 100 are specific to minors' access to healthcare and other amenities. By the end of the 2022 legislative session, seventeen of these bills were enacted into law.³² These proposals limit the availability of gender-affirming transition care for minors. In Mississippi, for instance, the Republican governor Tate Reeves signed a law prohibiting puberty blockers, hormone therapy, and other gender-affirming care for minors.³³ This state is one of many that have legalized restrictions on transgender healthcare, causing concerns by transgender adolescents and their parents. Parents recognize that young children may experience difficult-to-interpret emotions and that, without proper guidance and support, they may develop anxiety and depression. These individuals, who deserve the right to make private medical decisions between them and their doctor, require access to either mental health or gender-affirming care, or both. Such laws that limit physicians from treating these children disrupt their access to proper medical care. And because they are minors who may not be able to comprehend their emotions at such an age, the frustrations contribute to deteriorating mental health. Legislators have failed to implement laws that provide children with such protections. Access to gender-affirming care and other related services is one method of assisting these children during the transition process and should, therefore, not be restricted.

³² Brangham, William, and Dorothy Hastings. "Parents Concerned as New State Laws Restrict Rights of Transgender Children." PBS. Public Broadcasting Service, March 1, 2023.

³³ *Id.*

Some legislators have been at the vanguard of the battle against transgender children's rights. Cameron Sexton, a state representative from Tennessee, asserts that children lack the cognitive capacity to make such life-altering decisions as choosing their gender.³⁴ He believes that adults have the mental capacity to make these decisions but that issues of gender identity should not be forced upon minors and that such decisions should be left to adults. For this reason alone, he believes that a child's gender should not be changed until they reach the age of legal consent. His argument hinges on the notion that children lack the capacity to choose their gender. This makes the issue of gender identity appear more like a decision than a matter of natural reality. These arguments by the state representative represent a setback for transgender rights.

Dozens of bills have been proposed that would mandate schools to “out transgender students against their will.”³⁵ These legislators have not considered the impact of their proposed legislation on households or schools. They claim that the purpose of such regulations is to preserve the rights of parents, but they disregard the psychological effects on these children. Such legislation may expose transgender students to bullying and other forms of targeted aggression in school. However, legislators are indifferent to these harms and continue pushing for more laws that exclude transgender students from school. These minors have a right to privacy and, therefore, it is a form of misdirected fury for these state legislators to target vulnerable children in order to vent their ire. There is no reason for state authorities to be so concerned about a child's urge to identify with a gender other than their sex assigned at birth. Their identity has no bearing on the

³⁴ *Id.*

³⁵ Seldin, Harper. “Trans Students Should Be Treated with Dignity, Not Outed by Their Schools: ACLU.” American Civil Liberties Union, April 6, 2023. <https://www.aclu.org/news/LGBTQ+-rights/trans-students-should-be-treated-with-dignity-not-outed-by-their-schools>.

educational institution or the performance of public duty and is, therefore, not a cause for the current retaliation observed from state leaders.

Some leaders hide behind the desire to defend the country's "conservative" values. Imposing these leaders' conservative worldview on defenseless schoolchildren is a flagrant violation of their rights and liberties to express themselves. Attending school does not forfeit or deprive children of their rights and, thus, legislators should not use this to humiliate them. Schools and other educational institutions owe it to children to keep them safe and provide a thriving learning environment. Outing students against their will has negative repercussions, including extreme ones like suicide. Such outcomes should not be enabled, particularly in a democratic nation where the Constitution protects everyone's rights and freedoms.

Children have the right to participate in school activities like sports, regardless of their gender identity. However, some schools remain unaccepting of gender diversity, and legislators keep pushing for bills that undermine transgender or non-binary students. Ohio State Representative Jena Powell sponsored OH HB 151, which would have required that no individuals of the "male sex" could participate in female sports and vice versa.³⁶ If the participant's sex is disputed, the participant must establish their sex by getting a signed physician statement indicating that the participant's sex is based upon the findings of one of the following: "1. The participant's internal and external reproductive anatomy, 2. The participant's normal levels of testosterone, 3. An analysis of their genetic makeup."³⁷ Ultimately, this bill was targeted against transgender students since it required the disclosure of extremely sensitive information via genital checks just

³⁶ Staver, Anna. "Fact Check: Ohio Bill Banning Transgender Girls from Female Sports Could Require Genital Checks." The Columbus Dispatch. The Columbus Dispatch, June 7, 2022. <https://www.dispatch.com/story/news/2022/06/07/bill-transgender-athletes-could-require-genital-checks-girls/7529718001/>.

³⁷ *Id.*

to simply be involved in sports. It also meant that the legislator was adamant that gender identity should align with the sex assigned at birth. This is one example of the many humiliating struggles that transgender children continue to experience.

Conclusion

Violence, discrimination, and harassment continue to plague individuals who go against the traditional gender binary. It is worse for children and adolescents, particularly those in school, as state legislators continue to introduce bills restricting their rights. The failure of the government to provide these communities with concrete legal protections continues to expose them to such atrocities. While the decision in *Bostock* provided limited protection against discrimination, transgender people still are being denied the freedom to live out their truth. They are denied basic rights of privacy and self-determination to live as their authentic selves and, ultimately, are being penalized for just being themselves. It is wrong to violate the rights of others, and it is even worse when others seek to impose their religious and moral beliefs on these individuals. Transgender persons have the right to privacy so long as their actions do not infringe on the rights of those around them. These individuals should not have their gender identity challenged or denied. But some people believe that transgender people, particularly minors, should not have a voice. Their words and actions have been extremely hostile toward this community. This should serve as a wake-up call to legislators to stand up for transgender people. The Constitution ensures the liberty of all, so it is time for the government to legitimize this by vigorously defending their rights. Decisions like *Bostock*, which upheld the rights of transgender people to be free from discrimination at work, should be a model for equality in other aspects of life. One can hope that it provides inspiration and a framework for further anti-discrimination measures.

Bibliography

Avery, Dan. "Biden Signs Foreign Policy Memo Putting U.S. at 'Forefront' of Global LGBTQ

Rights." NBCNews.com. NBCUniversal News Group, February 5, 2021.

<https://www.nbcnews.com/feature/nbc-out/biden-signs-foreign-policy-memo-putting-u-s-forefront-global-n1256848>.

Brangham, William, and Dorothy Hastings. "Parents Concerned as New State Laws Restrict

Rights of Transgender Children." PBS. Public Broadcasting Service, March 1, 2023.

<https://www.pbs.org/newshour/show/parents-concerned-as-new-state-laws-restrict-rights-of-transgender-children>.

Burns, Katelyn. "Why Police Often Single Out Trans People for Violence." Vox. Vox, June 23,

2020. <https://www.vox.com/identities/2020/6/23/21295432/police-black-trans-people-violence>.

DeMillo, Andrew. "Arkansas Governor Signs Bill Allowing Medical Workers to Refuse

Treatment to LGBTQ+ People." PBS. Public Broadcasting Service, March 26, 2021.

<https://www.pbs.org/newshour/politics/arkansas-governor-signs-bill-allowing-medical-workers-to-refuse-treatment-to-LGBTQ+-people>.

Hurley, Lawrence. "Transgender Student Wins as U.S. Supreme Court Rebuffs Bathroom

Appeal." Reuters. Thomson Reuters, June 28, 2021. [https://www.reuters.com/world/us/us-supreme-court-declines-hear-transgender-school-bathroom-case-2021-06-28/#:~:text=WASHINGTON%2C%20June%2028%20\(Reuters\),corresponding%20with%20his%20gender%20identity](https://www.reuters.com/world/us/us-supreme-court-declines-hear-transgender-school-bathroom-case-2021-06-28/#:~:text=WASHINGTON%2C%20June%2028%20(Reuters),corresponding%20with%20his%20gender%20identity).

Larson, Erik. "Judge Blocks Biden Rules for Trans Access to Bathrooms, Sports."

Bloomberg.com. Bloomberg, July 17, 2022.

<https://www.bloomberg.com/news/articles/2022-07-17/judge-blocks-biden-rules-for-trans-access-to-bathrooms-sports#xj4y7vzkg>.

Lopez, German. "Anti-Transgender Bathroom Hysteria, Explained." Vox. Vox, May 5, 2016.

<https://www.vox.com/2016/5/5/11592908/transgender-bathroom-laws-rights>.

Mitchell, Travis. "Americans' Complex Views on Gender Identity and Transgender Issues." Pew

Research Center's Social & Demographic Trends Project. Pew Research Center, June 28, 2022. <https://www.pewresearch.org/social-trends/2022/06/28/americans-complex-views-on-gender-identity-and-transgender-issues/>.

Mitchell, Travis. "The Experiences, Challenges, and Hopes of Transgender and Nonbinary U.S.

Adults." Pew Research Center's Social & Demographic Trends Project. Pew Research Center, November 9, 2022. <https://www.pewresearch.org/social-trends/2022/06/07/the-experiences-challenges-and-hopes-of-transgender-and-nonbinary-u-s-adults/>.

Safer, Joshua D., Eli Coleman, Jamie Feldman, Robert Garofalo, Wylie Hembree, Asa Radix, and Jae Sevelius. "Barriers to Healthcare for Transgender Individuals." *Current Opinion in Endocrinology, Diabetes & Obesity* 23, no. 2 (2016): 168–71.

<https://doi.org/10.1097/med.0000000000000227>.

Sanger-Katz, Margot, and Noah Weiland. "Trump Administration Erases Transgender Civil Rights Protections in Health Care." The New York Times. The New York Times, June 12, 2020. <https://www.nytimes.com/2020/06/12/us/politics/trump-transgender-rights.html>.

Seldin, Harper. "Trans Students Should Be Treated with Dignity, Not Outed by Their Schools: ACLU." American Civil Liberties Union, April 6, 2023.

<https://www.aclu.org/news/LGBTQ+-rights/trans-students-should-be-treated-with-dignity-not-outed-by-their-schools>.

Staloch, Laura. "The Passage of Anti-Transgender Legislation Increases Internet Searches for 'Suicide' and 'Depression.'" PsyPost, January 29, 2023.

<https://www.psypost.org/2023/01/the-passage-of-anti-transgender-legislation-increases-internet-searches-for-suicide-and-depression-67233>.

Staver, Anna. "Fact Check: Ohio Bill Banning Transgender Girls from Female Sports Could Require Genital Checks." The Columbus Dispatch. The Columbus Dispatch, June 7, 2022.

<https://www.dispatch.com/story/news/2022/06/07/bill-transgender-athletes-could-require-genital-checks-girls/7529718001/>.

"The Struggle of Trans and Gender-Diverse Persons." OHCHR. Accessed April 9, 2023.

<https://www.ohchr.org/en/special-procedures/ie-sexual-orientation-and-gender-identity/struggle-trans-and-gender-diverse-persons>.

Thoreson, Ryan. "'All We Want Is Equality.'" Human Rights Watch, March 28, 2023.

<https://www.hrw.org/report/2018/02/19/all-we-want-equality/religious-exemptions-and-discrimination-against-lgbt-people>.

"United States: Transgender People at Risk of Violence." Human Rights Watch, November 25, 2021. <https://www.hrw.org/news/2021/11/18/united-states-transgender-people-risk-violence>.

Virupaksha, H. G., Daliboyina Muralidhar, and Jayashree Ramakrishna. "Suicide and Suicidal Behavior among Transgender Persons." *Indian Journal of Psychological Medicine* 38, no. 6 (2016): 505–9. <https://doi.org/10.4103/0253-7176.194908>.

Warner, David Michael, and Arunab Harish Mehta. "Identifying and Addressing Barriers to Transgender Healthcare: Where We Are and What We Need to Do about It." *Journal of General Internal Medicine* 36, no. 11 (2021): 3559–61. <https://doi.org/10.1007/s11606-021-07001-2>.

Zucker, Kenneth J., and Susan J. Bradley. *Gender Identity Disorder and Psychosexual Problems in Children and Adolescents*. Guilford Press, 1995.