

The Endocrine Society appreciates the opportunity to comment on the Department of Health and Human Services' Notice of Benefit and Payment Parameters for 2023, Section B Part 147—Health Insurance Reform Requirements for the Group and Individual Health Insurance Markets, Part B Non-Discrimination Based on Sexual Orientation and Gender Identity.

Founded in 1916, the Endocrine Society represents approximately 18,000 members dedicated to hormone research and physicians who care for people with hormone-related conditions. The Endocrine Society believes it is critical that the full spectrum of medical care be accessible to transgender individuals and have provided policy recommendations to achieve this in our position statement.<sup>1</sup> **We are strongly supportive of the Biden Administration's proposed rule to expand protections for LGBTQ+ individuals and prohibit Marketplaces, issuers, agents, and brokers from discriminating against consumers based on sexual orientation and gender identity.**

Even with existing protections for transgender individuals' access to appropriately trained healthcare professionals can be challenging. Lack of formal education on gender dysphoria/gender incongruence among clinicians often makes it difficult to find a health care team with expertise in the transition process. Increasingly, many programs and clinics that provide gender affirming care to transgender individuals face external pressures to close or disband due to anti-transgender activists and politicians. In addition, many transgender individuals also face barriers in accessing standard preventive services for their sex assigned at birth (i.e., prostate cancer screening for a transgender woman) from physicians who have had minimal experience caring for transgender individuals.

It is critical that transgender individuals can access appropriate treatment and care to ensure their health and well-being without the fear of discrimination or harassment. Transgender individuals who have been denied care show an increased likelihood of committing suicide and self-harm.<sup>2</sup> Making it harder to access health care services can further impact the health disparities and mental health issues that are experienced by transgender individuals. Seventy percent of transgender individuals have experienced maltreatment by medical providers, including harassment and violence.<sup>3</sup> We believe that prohibiting discrimination based on sexual orientation and gender identity as proposed in the rule will increase access to health care and decrease health disparities.

Thank you for your attention to this important health access/health equity issue. If we can be of further assistance, please contact Grace Kranstover, Manager of Government Affairs at [gkranstover@endocrine.org](mailto:gkranstover@endocrine.org).

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<sup>1</sup> Endocrine Society. Transgender Health. September 2017 <https://www.endocrine.org/advocacy/priorities-andpositions/transgender-health>

<sup>2</sup> Davidge-Pitts, C., et al. Transgender Health in Endocrinology: Current Status of Endocrinology Fellowship Program and Practicing Clinicians. *J Clin Endocrinol Metab.* (2017) 102(4):1286-1290.

<sup>3</sup> *Ibid*