

May 11, 2018

Department of Justice
Bureau of Justice Statistics
Washington, DC 20531

RE: Agency Information Collection Activities: Proposed eCollection eComments Requested;
Revision of a Currently Approved Collection; Comments Requested: National Crime Victimization
Survey

To Whom it May Concern,

On behalf of the Endocrine Society, I write to share our concerns with the Notice to change information collection for the National Crime Victimization Survey. The Endocrine Society is the world's largest professional organization of endocrinologists, representing the interests of over 18,000 physicians and scientists engaged in the treatment and research of endocrine disorders, including diseases such as diabetes, thyroid disease, infertility, and obesity, and care of patients diagnosed with gender dysphoria/gender incongruence (transgender).

The Notice proposes to raise the minimum age at which National Crime Victimization Survey questions are administered on sexual orientation and gender identity from age 16 to 18. We are concerned that the proposed changes to information collection will result in the loss of data on an important subset of the transgender community and provide an incomplete picture of crimes committed against this population.

Studies show that children and adolescents can understand the consequences of transgender medical care. The Endocrine Society's Clinical Practice Guideline, "Endocrine Treatment of Gender-Dysphoric/Gender Incongruent Persons,"¹ suggests that an adolescent has sufficient mental capacity by age 16 to understand the consequences of transitioning and make an informed decision about their care.

Transgender youth face significant discrimination and harassment. The Federal Government will miss the opportunity to collect important crime data from individuals under the age of 18 who are victims of crime based on their gender identity or sexual orientation by removing the questions related to sexual orientation and gender identity. A recent survey of youth between 13 and 18 years of age living in the United States found that 54 percent (n=51,394) of respondents witnessed bullying, hate messages, or harassment that were motivated by gender expression, and 63 percent

¹ Hembree, W., et al. Endocrine Treatment of Gender-Dysphoric/Gender Incongruent Persons. *The Journal of Clinical Endocrinology & Metabolism*, Volume 102, Issue 11, 1 November 2017, Pages 3869–3903



witnessed events motivated by sexual orientation.² This increase in bullying and harassment has had a particularly significant impact on transgender youth. According to the survey, 36 percent of transgender youth had been personally bullied or harassed and 56 percent had changed their self-expression or future plans as a result.³

Transgender and gender non-conforming youth often have associated psychological problems. An accurate understanding of the challenges that these youth face outside of the health care system will help the medical community integrate appropriate mental health services into their treatment. Furthermore, statistics that identify trends in violence against transgender youth will offer the opportunity to implement violence prevention programs in the community.

Thank you for considering our comments. We urge the Administration to continue to collect information on gender identity and sexual orientation from individuals 16 years of age and older. If we can provide any additional information, please contact Mila Becker, JD, Chief Policy Officer at mbecker@endocrine.org.

Sincerely,

Susan Mandel, MD
President, Endocrine Society

² Human Rights Campaign. Post-Election Survey of Youth. Accessed at www.hrc.org.

³ *Ibid.*