I am writing in opposition to the proposed changes in Title IX policies that would replace sex-based protections with gender identity, thereby allowing males who self-identify as women access to female-only facilities and institutions. Replacing sex with gender identity is an extreme ideological position with serious negative consequences regardless of good intentions. The proposed changes undermine the intention of Title IX policies regarding girls' sports. Sports are sex-segregated for good reason, as males have permanent physical advantages over females, regardless of testosterone levels or any sex reassignment treatments. Allowing males into female sports is unsafe and unfair.

The review article Transgender Women in the Female Category of Sport: Perspectives on Testosterone Suppression and Performance Advantage, published last month, gives this information: "[T]he performance gap between males and females becomes significant at puberty and often amounts to 10–50% depending on sport." They show that testosterone suppression reduces this advantage very minimally (~5%), and that transgender-identifying males retain a definite advantage over females.

Additionally, girls and women have a right to private facilities such as restrooms and changing rooms, away from male-bodied people. This is an issue of safety, privacy, and in some cases religious freedom. Please do not ignore the wishes of women and girls who do not consent to lose their right to female-only facilities.

I strongly urge the Department of Education to uphold the sex-based protections of Title IX, and to find ways of protecting transgender individuals that do not come at the expense of women's rights.

Thank you.