



Submitted via email to lgbtqi@usaid.gov

Women's Liberation Front Response to USAID LGBTQI+ Inclusive Development Policy

Executive Summary and Introduction

The Women's Liberation Front (WoLF) is a nonpartisan, nonprofit organization that works to restore, protect, and advance the rights of women and girls. Fighting against regressive gender roles is central to WoLF's mission, which necessarily includes protecting the rights and dignity of LGB people (with a focus on lesbians).

WoLF thanks USAID for the opportunity to provide information for the "LGBTQI+ Inclusive Development Policy." Below we have noted multiple instances of inaccuracies, omissions, and instances where clarification is needed — particularly with a focus on how the proposed USAID policy would negatively impact women, girls, and individuals who are lesbian, gay, or bisexual ("LGB").

#1. Inaccuracy: The assumption that everyone has a gender identity or expression, despite claims of data-driven policy and evidence to the contrary

In the Introduction, USAID claims, "Everyone, everywhere, has a sexual orientation, a gender identity, gender expression, and sex characteristics" (page 2). This statement is inaccurate, and defies the previously stated goal on page 1 to "Drive Evidence-Based Policies and Approaches."

The claim that "everyone has a gender identity" is easily disproved by simply asking most people if they have a gender identity. The authors of the present response do not

have a gender identity, nor do the diverse women in every part of the country who are members of WoLF. Since a “gender identity” is a subjective belief based solely on self-identification, the notion is quickly dispelled with even one individual providing claim to the contrary.

“Gender identity” underpins a belief system which relies on the spiritual concept that individuals possess an inner essence (akin to a soul) that is either aligned (or not) with their sex; that this essence is distinct and independent of their physical body. Many people do not subscribe to this belief system and, indeed, many women and LGB people (who have been harmed or limited by the societal constraints of gender as a socially-prescribed role) object to the presumption that they “identify” with this oppressive system.

Further, the claim that “Everyone, everywhere has a ... gender expression” relies on an ethnocentric understanding of gender roles which does not always apply to people of other times, cultures, ages, religions, etc. For the United States to impose this racist, sexist, misogynistic belief on the rest of the world (and using its wealth to coerce its adoption) is essentially “gender colonialism,” or, the forcing of a dominant society’s current understanding of gender norms and expressions on other cultures.

#2. Inaccuracy: The proposed policy demonstrates an endemic misunderstanding of what “gender” is and falsely positions feminism that opposes the imposition of gender roles and sex stereotypes (ie. “the antigender movement”) as a threat to progress

WoLF is deeply concerned by inaccurate descriptions throughout the proposed policy, beginning on page 5 of the Introduction, that position “the antigender movement” as a “threat,” “challenge”, and “backsliding.” We believe this reflects a lack of understanding on what gender is, how it has historically harmed women and girls, and why a progressive movement must inherently be antigender (notably, in contradiction to USAID’s stated principle #4: “Understand the Landscape: Be Aware of History, Stakeholders, and What Has Worked”).

Gender is commonly defined as “*the behavioral, cultural, or psychological traits typically associated with one sex (synonym: “sex-role stereotypes”)*” (Merriam-Webster).

Gender is not a synonym for sex, nor is it a replacement characteristic. Gender is an oppressive force used by the dominant sex class (men) against the subservient sex class (women).

Feminist historian Sheila Jeffreys describes gender as “the foundation of the political system of male domination.” (Gender Hurts: A Feminist Analysis of the Politics of Transgenderism. Routledge, 2014.)

Gender itself is what enables homophobia (“women are supposed to love and be attracted to only men,” etc.) and discrimination against those who are perceived to be violating gender roles (for example, a man in a dress). If there was no gender in the first place, there would be no basis for the discrimination as fashion choices, behaviors, etc., would not be socially prescribed based on sex. Much of what the proposed policy describes as “violence, discrimination, stigma, and criminalization” against “LGBTQI+ persons” would not be possible if not for the existence of gender.

A Gender Abolitionist, or, what USAID may refer to as someone who is part of “the antigender movement,” is a person opposed to the societal imposition of gender roles. This is the category that WoLF and the thousands of radical feminists across the country we represent fall into. We fight to abolish all sex stereotypes (aka gender roles).

The proposed policy’s framing of “the antigender movement” as a threat,” “challenge”, and “backsliding” demonstrates a failure on USAID’s part to understand the history of the feminist movement and the progressive ideals driving the desire to abolish gender.

The failure to understand gender as a system of oppression and feminists as the forefront leaders in the fight against violence is so deeply woven through the proposed policy that it is impossible to provide specific recommendations for improvement within the proposed framework. WoLF recommends USAID engage in a discovery and learning process which involves feminist leaders of the gender abolition movement in addition to other stakeholders. WoLF is available for consultation and would be happy to provide some additional resources and names for further consultation.

Background

#1. Clarify: Background misrepresents the causes of male-patterns violence and characteristics associated with heightened risk

On page 8 of the proposed policy, USAID describes in a callout-box what it calls “Gender-Based Violence Impacting Transgender and Other Gender-Diverse Individuals.” To be in alignment with USAID’s stated “data-driven” approach and principle of “understanding the landscape,” this section requires further clarification into the true causes and associated risk factors for victims of male violence.

The policy states:

“Transgender and gender-diverse individuals, particularly transgender women from historically persecuted racial and ethnic backgrounds, face extremely high rates of violence and extrajudicial killings. According to the Trans Murder Monitoring project, more than 325 transgender individuals were murdered globally from October 2021–September 2022.”

While even one unnecessary or avoidable death is a tragedy, these numbers out of context do not paint a holistic picture of the landscape of male violence. Here is some additional data that is relevant to understanding the systems in which we are working:

- Globally, an estimated 81,100 women and girls were killed intentionally in 2021. Over half of these murders were carried out by family members ([UN Office of Drugs and Crime, 2021 report](#)¹)
- Reports from the Human Rights Campaign indicate that [over one-third](#)² of US murder victims who identify as “transgender” were involved in prostitution — a form of sexual violence that primarily effects women and involves staggering rates of violence. In [Brazil](#)³, the country with the highest numbers of murder victims who identify as “transgender,” the majority of these victims were victims of commercial sexual exploitation.
- In the United States, 81% of the trans-identified people who were murdered according to the Human Rights Campaign were black, and 96% were male. With 52% of US murder victims being black, and 86% of those victims being male⁴, it

¹ “Gender-related kills of women and girls (femicide/feminicide),” UN Office of Drugs and Crime (2021), https://www.unodc.org/documents/data-and-analysis/briefs/Femicide_brief_Nov2022.pdf

² “Fatal Violence Against the Transgender Community in 2017,” Human Rights Campaign (2017), <https://www.hrc.org/resources/violence-against-the-transgender-community-in-2017>

³ “Brazil Continues To Be the Country with the Largest Number of Trans People Killed,” Pulitzer Center (2022), <https://pulitzercenter.org/stories/brazil-continues-be-country-largest-number-trans-people-killed>

⁴ “Black Homicide Victimization in the United States,” Violence Policy Center (2020), <https://vpc.org/studies/blackhomicide22.pdf>

is clear that there are too many factors at play to consider most of these murders “gender-based” (regardless of the failures of that term).

If USAID truly wants to address the violence experienced by LGB people and anyone who is not perceived as conforming to sex-stereotypes, it is vital to be clear about the risk factors that result in the violence the policy cites. Primarily, these risks include participation in commercial sexual exploitation and other forms of crime (described by USAID as “the informal economy”). Ending commercial sexual exploitation and male violence, therefore, should be a primary focus of any attempts to aid LGB people.

Additionally, it is disturbing to see the cruel treatment of LGB people globally described in this section on page 8 as an afterthought, particularly in the discussion of “corrective rape” which is described as targeting “Transgender individuals, along with lesbians.” This demonstrates a lack of understanding of the history of violence against lesbians, who are not only the primary victims of this form of abuse, but also the victims known to be targeted systematically in a number of cultures, such as South Africa⁵.

Finally, the policy should clarify that what it means by “gender-based violence” is actually male violence against women, children, and sometimes other men who are perceived as violating sex-stereotypes created by patriarchy and upheld through gender.

#2. Inaccuracy: Background inaccurately describes “transgender” identities as “not conforming to dominant gender norms” when gender ideology is, in reality, a repackaging of those same, harmful, norms

This section further fails to accurately portray an understanding of the concept of gender by inaccurately describing “LGBTQI+ youth” as individuals who “do not conform to dominant gender norms or who are impacted by artificial expectations of masculinity, femininity, and/or the gender binary” (page 8).

While dominant gender norms vary from culture to culture, one thing is always true: the “transgender” movement is directly invested in upholding gender norms. This is prominent throughout this very proposal, which positions the “antigender movement”

⁵ Ariana Puzzo, “In South Africa, LGBTQ bigotry raises concern of ‘corrective’ rape,” *Social Justice News Nexus* (2019), <https://sjnnchicago.medill.northwestern.edu/blog/2019/05/15/in-south-africa-lgbtq-bigotry-raises-concern-of-corrective-rape/>

as regressive despite no evidence that even purports to support this claim and despite the decades of progressive gender abolition advocacy of which any serious discussion of gender should be aware.

This is no more clear than in countries like Iran⁶, where same-sex attracted individuals are forced by a homophobic, theocratic state to “transition” to the opposite sex (portray themselves through unnecessary surgeries, hormonal injections, and aesthetic choices). This is done on penalty of death — since homosexuality is illegal.

Even in the United States we see this same pattern. Children who demonstrate early signs of same-sex attraction are forced by homophobic parents to “transition” so that the parent can enjoy life with an outwardly-seeming “normal” and “straight” child. This is no more obvious than in the case of Kai Shappley, whose mother [admitted](#)⁷ to “transitioning” Kai following homophobic fears that Kai would grow up to be gay — which led to physical abuse of a toddler for the sin of wanting to play with “girl” toys..

A [report](#)⁸ from the Times UK on the Tavistock gender clinic found that, “So many potentially gay children were being sent down the pathway to change gender, two of the clinicians said there was a dark joke among staff that “there would be no gay people left”.

Gender identity ideology (the belief system supporting the concept of “gender identity” and promotes its political dominance) is in no way resistant to dominant gender norms. Rather, it is simply a repackaging of those same norms. For example, while gender abolitionists (or “the antigender movement”) would say that any child can play with dolls and wear dresses regardless of their sex, gender identity ideology posits that someone who plays with dolls and wears dresses is likely a girl, regardless of their sex. Gender identity advocates are actively hostile to the notion that these stereotypes should be abolished, because it is odds with their “identity.”

There are more accurate frameworks to describe individuals who identify themselves as transgender; for example, as individuals who wish to portray the stereotypes typically associated with the opposite sex, or those with the belief that they have an inner

⁶ “Why Iran is a hub for sex-reassignment surgery,” *The Economist* (2019), <https://www.economist.com/middle-east-and-africa/2019/04/04/why-iran-is-a-hub-for-sex-reassignment-surgery>

⁷ “Kai Shappley” (2020), <https://imgur.com/a/BqM7g1O>

⁸ Lucy Bannerman, “It feels like conversion therapy for gay children, say clinicians,” *The Times* (2019), <https://www.thetimes.co.uk/article/it-feels-like-conversion-therapy-for-gay-children-say-clinicians-pvsckdvg2>

essence or core of their being that has its own sex which is distinct and opposite to their sex.

#3. Omission: While LGB people have been targets of authoritarianism, the report omits that the transgender movement is often an authoritarian actor against women/girls and LGB people throughout the world

The Background section states that “LGBTQI+ people also have been among the first populations targeted by authoritarian actors... coalitions of antidemocratic, anti-rights actors have increasingly pursued targeted, divisive anti-LGBTQI+ campaigns that are a cover for wider repression of freedom of assembly and freedom of expression” (page 10).

While this is somewhat true (especially in regards to LGB people being targeted by authoritarian regimes), this section contains major omissions, specifically, in regards to the authoritarian behavior used by the gender identity movement in countries where this movement is part of the dominant culture to silence and curtail the freedoms of women and LGB people who do not submit to the gender identity belief system, which relies upon others expressing a belief in the concept as well as its derivatives and implications, such as the concepts of “transgender” and “nonbinary” (an inner essence that is neither male nor female, is both, or is something else).

Feminists have long been on the forefront of the fight for civil liberties, including freedom of speech and assembly. However, today, feminist women face censorship, blacklisting, and violence for speaking against gender identity ideology. Among the ranks of WoLF membership are more women than we could list who have faced professional or personal persecution for their adherence to gender ideology including being fired from jobs, forced out of professional and academic spaces, barred from speaking at public events, and assaulted or harassed for participating in the civil process on these issues. For example, in Tacoma, Washington, women attending a “Let Women Speak” event were violently assaulted by pro-trans protesters. These are not outliers, they are the intentional tactics of the gender identity movement to silence women.

LGB people have also been victims of this authoritarian behavior. Lesbian women are no longer allowed to assemble on their own, especially in public, without “including” men who pretend to be lesbians. Lesbians are most often the targets of this behavior, however, gay men have also started to notice recently that a failure to “include” straight women who identify as men in their spaces and events will soon lead to strife. There are

almost no remaining organizations, clubs, communities, or spaces for exclusively same-sex attracted individuals (gays or lesbians) any more.

The omission of the authoritarian tactics adopted by the gender identity movement against women/girls and LGB people demonstrates the degree to which this behavior has been accepted and normalized in the United States government.

#4. Inaccuracy: Proposed policy describes “divisions among LGBTQI+ people” and “women’s rights advocates” as “artificial” and crafted by “ antidemocratic nationalist and authoritarian anti-rights movements”

The Background section states “By building artificial divisions among LGBTQI+ people, allies, women’s rights advocates, and others, these antidemocratic nationalist and authoritarian anti-rights movements increase the risks of antiLGBTQI+ GBV and persecution, and the shrinking of civil society space” (page 10). However, this is a dramatically inaccurate representation of the conflict that arises when women’s rights and spaces are invaded by men. The fact is that, rather than artificial divisions, this political movement (and this policy) endorse and promote artificial *conflation*; the letters of LGB are mutually distinct (one cannot be both a gay man and a bisexual man, or a lesbian and a bisexual woman, for example); a person who identifies as transgender can be any of those things; and WoLF can think of nothing more artificial than throwing this together in an alphabet salad.

WoLF, as the leading women’s rights nonprofit focused on advancing women’s sex-based rights, is vehemently on the side of defending our hard-fought civil rights and liberties. Indeed, it is the very importance of those rights that leads us to defend them against their effective neutering via “gender identity” policies which would have the effect of, for example, eliminating women’s and girls’ sports; eliminating single-sex housing in prisons, domestic violence shelters, and hospitals; and compelling speech and belief in violation of the First Amendment.

The conflict between women’s and LGB rights and gender identity ideology is glaringly obvious to many people, especially women and lesbians, who have come to the conclusion that there is a conflict of rights on their own simply by observing the natural consequences of “gender identity” policies being implemented around them.

Goals

#1. Inaccuracy: Proposed policy claims to be evidence-based and data-driven while making multiple assumptions or recommendations that defy this claim

The “Goals” section of the proposed policy claims that USAID aims to “drive evidence-based policies and approaches: strengthen responses through data” (page 12). However, the policy demonstrates that USAID is not interested in all data — only data that supports gender identity ideology and related policies.

This section states “USAID policies and programs designed to advance LGBTQI+ inclusive development should be informed by the expressed needs, priorities, and realities of LGBTQI+ people and other marginalized communities” (page 12). However, the expressed desires of a population are not necessarily the best predictor of desired outcomes. Additionally, it’s clear that USAID only means to consider the expressed needs, priorities, and realities of *certain* “LGBTQI+” individuals — the ones who already align with the government’s gender identity belief system. For example, there is no evidence that USAID has listened to lesbian and bisexual women who do not agree with the gender identity framework, resist forced teaming with men who call themselves women, and oppose the US government’s gender colonialism.

Principles

#1. Clarify: USAID adopts a principle of “do no harm” while simultaneously promoting an ideology that is extremely harmful to women, girls, and same-sex attracted youth

Principle #1 states that USAID will aim to uphold the principle of “do no harm” and that “paramount to all LGBTQI+ inclusive development programs is the safety and security of persons and organizations” (page 14). However, by promoting gender identity ideology, USAID is promoting a belief system that primarily harms the very people this proposal aims to serve: LGB individuals who do not conform to the stereotypes of their sex, including through same-sex attraction.

Gender identity ideology is leading to increasing numbers of children and young adults being medicalized for not conforming to sex-based stereotypes. All current evidence

suggests this group is massively, disproportionately same-sex attracted (LGB)⁹. Known as “gender-affirming care,” this medicalization takes the form of puberty blockers, cross-sex hormones, and surgical procedures on a person’s genitalia or breasts. These drugs and procedures serve no physical medical purpose, but rather are undertaken to try to resemble the opposite sex, ostensibly to treat clinically significant distress that a person experiences as a result of not appearing “masculine” or “feminine” enough. These drugs and procedures can lead to sterilization and adult sexual dysfunction; the children who “consent” to them are simply too young to meaningfully consent to permanent impairment of fertility or of adult sexual experiences that they cannot yet comprehend.

As noted earlier in this comment, while this movement is billed as progressive, but the “born in the wrong body” narrative has been notably embraced by countries such as Pakistan and Iran (where homosexuality is punished by death, but “sex change” is government subsidized). This attitude may be more common than many realize - whistleblowers from a child “gender” clinic in the UK have stated that “gender-affirming” care is sometimes sought by families who prefer a “transgender” child over a gay child. This has been reported in the U.S. as well. One conservative religious family believed their young son was gay; in response they sought conversion therapy and physically abused him to the point where he was suicidal. Unsurprisingly, once they allowed their son to play with whatever toys he wanted, wear what he wanted, and when they stopped beating him for not adhering to stereotypical “male” behavior, he bloomed. There are many such families who would rather treat their son as a daughter than accept that their son wants to play with dolls and wear princess dresses¹⁰.

Given the high rate of desistance from childhood gender dysphoria, as well as the very high number of dysphoric youth who are same-sex attracted¹¹, serious caution should be urged. It is pure eugenicism for our society to accept that the solution for distress experienced by gender-nonconforming young people is chemical castration and removing their healthy sex organs.

⁹ Jack Harrison, “Wonky Wednesday: Trans People & Sexual Orientation,” National LGBTQ Taskforce (2015), <https://www.thetaskforce.org/wonky-wednesday-trans-people-sexual-orientation/>

¹⁰ Emily McCombs, “Christian, Conservative And Parenting A Transgender Child In Texas,” HuffPost (2017), https://www.huffpost.com/entry/kimberly-and-kai-shappley-transgender-child-bathroom-rights_n_58b5b5b6e4b060480e0c4393

¹¹ Steensma, et al., “Factors Associated With Desistance and Persistence of Childhood Gender Dysphoria: A Quantitative Follow-Up Study,” *Journal Of The American Academy Of Child & Adolescent Psychiatry* (2013), https://www.transgendertrend.com/wp-content/uploads/2017/10/Steensma-2013_desistance-rates.pdf

This could not be further from the ethos of “do no harm.”

#2. Omission: Landscape and history of women’s sex-based rights and women, especially lesbians, as stakeholders

The fourth principle described by USAID in the proposed policy is “understand the landscape: be aware of history, stakeholders, and what has worked” (page 15). However, due to the many serious inaccuracies and omissions throughout this policy in regards to the landscape of gender identity and its repercussions, as well as the history of the feminist fight for gender abolition, it is clear that USAID is not currently living up to this standard.

The proposed policy states: “USAID recognizes the importance of strong movements that are able to mobilize multiple stakeholders, allies, and champions for collective advocacy, and encourages supporting local efforts to build and foster relationships among LGBTQI+ groups and other organizations and movements that are suffering similar forms of oppression” (pages 15 -16).

Therefore, WoLF recommends USAID consider the feedback from groups that represent the rights of women, girls, and LGB individuals beyond those who narrowly conform to the state’s preferred ideology. WoLF is happy to provide recommendations for excellent advocacy groups in these areas.

Policy Into Practice

#1. Inaccuracy: Recommendation to disaggregate data on the basis of gender identity vs. sex erases women and goes against international policy best-practices

The Policy Into Practice section recommends that “USAID performance indicators should be disaggregated by gender identity for person-level data” (page 17). However, this recommendation goes against all research indicating the importance of sex dis-aggregated data as well as international policy best practices. UN Women, for

example, [states](#)¹², “sex-disaggregated data and other relevant knowledge are key to achieving gender equality.”

Sex is an extremely important factor in all research, and WoLF urges continued attention to sex as an objective characteristic. Women and girls who may be “LGBTQI+” rely absolutely on the recognition of ‘sex’ as a characteristic entirely separate and distinct from sexual orientation and “gender identity;” the characteristic of sex should always have an objective basis and not be “self-identified.”

The collection of this data is vitally important for providing accurate information to the public on the unique challenges facing women and girls, including those who may believe they have a gender identity.

In her book “Invisible Women,” Caroline Criado-Perez clearly highlights the many ways in which sex-blind research has failed women and girls, and prevented progress. She writes:

“Getting to grips with the reality that gender-neutral does not automatically mean gender-equal would be an important start. And the existence of sex-disaggregated data would certainly make it much harder to keep insisting, in the face of all the evidence to the contrary, that women’s needs can safely be ignored in pursuit of a greater good.”

Such data is essential not just for women generally, but especially for particularly vulnerable groups such as lesbian and bisexual women, domestic violence and sexual violence survivors, and incarcerated women and girls.

For example, without accurate recording of sex and crime data, the federal Bureau of Prisons (BOP) would not have made some startling discoveries this year. In their annual report required by the Prison Rape Elimination Act, they found - because they track sex - that while “transgender status” is correlated with a heightened risk of victimization, it is also correlated with a heightened risk of perpetration of sexual assault and harassment of men in men’s prisons. Without accurate tracking of sex data properly identifying them as male, the BOP also would not have been able to report that 48% of trans-identified men in the federal system are sex offenders, or that nearly all transidentified victims of sexual assault are convicted sex offenders, raising

¹² “Gender Statistics and Sex-Disaggregated Data,” UN Women Strategic Plan 2022-2025, <https://www.unwomen.org/en/un-women-strategic-plan-2022-2025/statistics-and-data>

reasonable statistical questions as to whether “transgender status” is even a causative factor of their heightened rate of victimization. This issue should be further studied.

Sex-disaggregated data is especially important in health research, where the reality of a person’s biology matters. For example, a [2022 study in *Economia Politica*](#)¹³ found major public health disparities during the COVID-19 pandemic based on sex, stating:

“Sex and gender matter to health outcomes, but despite repeated commitments to sex-disaggregate data in health policies and programmes, a persistent and substantial absence of such data remains especially in lower-income countries. This represents a missed opportunity for monitoring and identifying gender-responsive, evidence-informed solutions to address a key driver of the pandemic.”

WoLF recommends USAID correct this recommendation to instead require data to be disaggregated on the basis of sex rather than gender identity. If USAID also wishes to collect information on other characteristics such as sexual orientation or a belief in “gender identity,” that should be done independent of sex. Although, it should be noted, that the rise of a huge variety of gender identities such as ‘nonbinary’, ‘two-spirit’, ‘gender-queer’, ‘demi-girl/boy’, and other neo-genders will make this task essentially impossible and largely meaningless.

This RFI response is submitted on behalf of Women’s Liberation Front (WoLF) by Atty. Lauren Bone.

If you seek further information, contact us legal@womensliberationfront.org. Read more at womensliberationfront.org.

¹³ Hawkes, et. al, “Sex-disaggregated data matters: tracking the impact of COVID-19 on the health of women and men,” *Economia Politica* (2022), <https://link.springer.com/article/10.1007/s40888-021-00254-4>