



## Women's Human Rights Campaign

Rochelle Walensky  
Director of the Centers for Disease Control and Prevention  
Massachusetts General Hospital  
55 Fruit St  
Boston, MA 02114

March 17, 2021

RE: Executive Order 13988 on Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation

Dear Dr. Rochelle Walensky,

As Chair of the Women's Human Rights Campaign USA, I am writing to express my organization's concerns regarding President Biden's Executive Order 13988, 86 C.F.R. 7023 (2021), on Preventing and Combatting Discrimination on the Basis of Gender Identity or Sexual Orientation, and to ask that it be implemented in such a way that does not conflict with the sex-based rights of women and girls. We have not, as a country, taken the time to carefully evaluate exactly what the impact will be on women and girls of defining the word sex to include "gender identity." We must now take the opportunity to have this important conversation.

The Women's Human Rights Campaign (WHRC) is a global nonpartisan group of volunteer women dedicated to protecting women's sex-based rights, and WHRC USA is the U.S. chapter of WHRC. Our volunteers include academics, writers, organizers, activists, lawyers, and health practitioners. The Declaration on Women's Sex-Based Rights was created by the founders of WHRC to lobby nations to maintain language protecting women and girls on the basis of sex rather than "gender" or "gender identity." The Declaration, which has more than 2,000 signatories in the United States and more than 15,000 worldwide, re-affirms women and girls' sex-based rights and challenges the discrimination we experience from the replacement of the category of sex with that of "gender identity."

As you conduct your review ordered by President Biden, the US chapter of the Women's Human Rights Campaign (WHRC-USA) requests that the National Institutes of Health pause any proposed changes to regulations, policies, and guidelines pending a thorough impact assessment. The Center for Disease Control (CDC) is responsible for accurately reporting on diseases and viruses that affect the human population. But how does this Executive Order affect the citizens of this country? Sex is defined as either of the two main categories--male and female—into which humans and most other living things are categorized on the basis of their reproductive functions. "Gender identity" is an individual,

subjective feeling about oneself. It has no basis in material reality and is not scientifically quantifiable.

Males are at a twenty percent higher risk than females to contract Covid-19. This female immunity comes from the extra X chromosome, which doubles the rate at producing antibodies; estrogen and progesterone promote an immune response. Despite these benefits, females in the United States account for 75% of all autoimmune cases. If gender identity is promoted over biological sex, then future research would need the following subject categories: transgender, non-binary, fluid, agender, bigender, genderqueer, gender variant, third gender, two-spirit. Either sex can use any of these classifiers. There is no reason why females cannot also identify as transwomen.

The August 2020 study “Sex Differences in Immune Responses that Underlie COVID-19 Disease Outcomes” by Takehiro Takahasi et. al showed different immune responses between the sexes. Female subjects had a higher T cell activation rate but the greater their IL-8 and IL-18 levels, the worse the disease outcome; male subjects had higher plasma levels of IL-8 and IL-18 and the lower the T cell levels in males, the worse the disease outcome. Ignoring these sex-based factors would put all patients at risk, regardless of how they identify.

WHRC USA appreciates the opportunity to share with you our concerns, and I would be happy to answer any questions you might have about the necessity of protecting the sex-based rights of women and girls in medicine. Please contact me at [info@womensdeclaration-usa.com](mailto:info@womensdeclaration-usa.com) if I can be of further assistance.

To learn more about our organization, visit [www.womensdeclaration.com](http://www.womensdeclaration.com)

Best regards,



Chair of Women's Human Rights Campaign USA