



October 2<sup>nd</sup>, 2014

Michael Fine, M.D., Director of Health  
Rhode Island Department of Health  
Three Capitol Hill  
Providence, RI 02903

Re: Proposed Amendments to Rules & Regulations Governing Vital Records

Dear Director Fine:

On behalf of the Board of Directors, staff, and young people we serve throughout Rhode Island, Youth Pride Inc. (YPI) would like to express its support for revising Section 35.5 of the Rules & Regulations Governing Vital Records (R23-3-VR) with regards to changing gender markers on an individual's birth certificate.

Youth Pride is the only non-profit organization in Rhode Island dedicated to the social, emotional and educational needs of young people impacted by sexual orientation or gender identity/expression. We serve over 750 Rhode Island LGBTQQ (lesbian, gay, bisexual, transgender, queer and questioning) youth each year. Over 10% of the youth we serve identify as transgender. Our staff spend many hours helping our transgender clients find referrals to culturally competent providers and navigate the DMV, the courts, and other systems to change their gender markers. Most of our clients are discouraged when they learn about Rhode Island's regulations for obtaining new birth certificates, so we are excited to read about these new revisions.

We particularly support the following revisions to Section 35.5:

- Allowing a new birth certificate to be issued with the appropriate gender marker without indicating that the birth certificate has been changed. This is an important change that will help better protect the privacy of transgender people.
- Allowing a gender marker change on a birth certificate based on proof that the individual has undergone surgical and/or hormone treatment and/or "other treatment appropriate for the individual." Many of the youth we serve do not have the financial means to afford surgery, or have no plans to have surgery as part of their transition, but they have an immediate need to change their birth certificates for school, housing, employment, and other important steps towards independence. We appreciate this inclusive revision that acknowledges there is more than one way to be transgender.

We do, however, have concerns about some of the language used in one of the proposed regulations:

- Rhode Island licensed medical providers should not be the only type of provider who can certify a person's gender identity. Many of our clients, and transgender people in general, regularly receive treatment from mental health providers who can provide certification.

We applaud the steps being taken by the Department of Health to make this process less cumbersome for people, like the transgender youth we serve at Youth Pride Inc., as they try to change documentation that is so vital for education, employment, finances, etc. Thank you for your consideration of this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kerri Kanelos", written over a light blue horizontal line.

Kerri Kanelos  
Executive Director