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**Call to Order – Herb Stewart, Ph.D, Board Chair**

- Welcome and Introductions
- Emergency Egress Procedures Page 3
- Mission of the Board Page 4

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**Approval of Minutes**

- Board Meeting – January 22, 2019\* Page 5

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**Ordering of Agenda**

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**Public Comment**

*The Board will receive public comment related to agenda items at this time. The Board will not receive comment on any pending regulation process for which a public comment period has closed or any pending or closed complaint or disciplinary matter.*

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**Agency Director Report - David E. Brown, DC**

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**Chair Report – Herb Stewart**

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**Legislation and Regulatory Actions – Elaine Yeatts**

- Chart of Regulatory Actions Page 10
- Report of 2019 General Assembly Page 11
- Consideration of Public Comment on Guidance Document 125-9: Guidance on practice of conversion therapy\*  
(public comment period ended 3/20/2019) Page 15

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**Staff Reports**

- Executive Director's Report – Jaime Hoyle Page 200
- Discipline Report – Jennifer Lang, Deputy Executive Director Page 208
- Board Office Report – Deborah Harris, Licensing Manager Page 210

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**Board Counsel Report – James Rutkowski, Assistant Attorney General**

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**Committee Reports**

- Board of Health Professions Report – Herb Stewart Page 211
  - Legislative/Regulatory Committee – Jim Werth
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**Unfinished Business**

- None

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**New Business**

- Former Argosy Students and Practicum Hours

Page 248

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**Next Meeting – July 23, 2019**

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**Adjournment**

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**Probable Cause Case Review – all Board Members**

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**\*Requires a Board Vote**

This information is in **DRAFT** form and is subject to change. The official agenda and packet will be approved by the public body at the meeting and will be available to the public pursuant to Virginia Code Section 2.2-3708(D).

**PERIMETER CENTER CONFERENCE CENTER  
EMERGENCY EVACUATION OF BOARD AND TRAINING ROOMS**  
(Script to be read at the beginning of each meeting.)

**PLEASE LISTEN TO THE FOLLOWING INSTRUCTIONS ABOUT  
EXITING THESE PREMISES IN THE EVENT OF AN EMERGENCY.**

In the event of a fire or other emergency requiring the evacuation of the building, alarms will sound.

When the alarms sound, leave the room immediately. Follow any instructions given by Security staff

**Board Room 3**

Exit the room using one of the doors at the back of the room.  
(**Point**) Upon exiting the room, turn **RIGHT**. Follow the corridor to the emergency exit at the end of the hall.

Upon exiting the building, proceed straight ahead through the parking lot to the fence at the end of the lot. Wait there for further instructions.



Virginia Department of  
**Health Professions**  
Board of Psychology

## **MISSION STATEMENT**

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Our mission is to ensure safe and competent patient care by licensing health professionals, enforcing standards of practice, and providing information to health care practitioners and the public.



**VIRGINIA BOARD OF PSYCHOLOGY**  
**Quarterly Board Meeting**  
**Minutes**  
**January 22, 2019**

The Virginia Board of Psychology ("Board") convened for a quarterly board meeting on January 22, 2019 at the Department of Health Professions (DHP), Perimeter Center, 9960 Mayland Drive, Henrico, Virginia, Board Room 3.

**Board Members Present:**

Herbert Lee Stewart, Ph.D., LCP, Chairperson  
Andrea Bailey, Citizen Member  
John D. Ball, Ph.D., ABPP, LCP  
Peter Sheras, Ph.D., ABPP, LCP  
Rebecca Vauter, Psy.D., ABPP, LCP  
Susan Brown Wallace, Ph.D., LCP, LSP  
James Werth, Jr., Ph.D., ABPP, LCP

With seven (7) member present, a quorum was established.

**Board Members Absent:**

None

**Staff Present:**

Christy Evans, Discipline and Compliance Case Specialist  
Jaime Hoyle, Executive Director (\*arrived late at 12:05 p.m.)  
Jennifer Lang, Deputy Executive Director  
Elaine Yeatts, Senior Policy Analyst

**Board Counsel Present:**

James Rutkowski, Assistant Attorney General  
Allyson Tysinger, Senior Assistant Attorney General

**Call to Order:**

Dr. Stewart called the meeting to order at 10:06 a.m. and read the board's mission statement and emergency egress procedures. Board members, staff and members of the public introduced themselves.

**Order of the Agenda:**

The board accepted the agenda as presented.

**Approval of Minutes:**

The minutes from the October 30, 2018 board meeting were considered and discussed. Dr. Werth made a motion to accept the minutes, as amended. The motion was seconded by Dr. Vauter and passed with a unanimous vote.

**Public Comment:**

Comments were provided by members of the public and included personal experiences with conversion therapy, the need to clearly define conversion therapy, and the concern that conversion therapy is not evidence-based treatment. One individual noted that as far back as 1973, the American Psychiatric Association indicated that homosexuality was not to be classified as a mental disorder. In addition, Jennifer Morgan provided the attached statement (Attachment A) on behalf of the Virginia Academy of Clinical Psychologists (“VACP”).

Dr. Morgan also advised the board that the VACP’s Spring Conference will be held in Newport News on April 18-19, 2019 and the board’s Conversation Hour has been scheduled for 3-5pm on April 18.

**Agency Report:**

Ms. Yeatts advised the board that DHP’s Director, David Brown, the Chief Deputy Director, Barbara Allison-Bryan, and the board’s Executive Director, Jaime Hoyle, were at the General Assembly and were unable to attend the meeting.

**Chair Report:**

Dr. Stewart noted that he attended the first session of the ASPPB Board of Directors meeting in December. He will report additional information to the board in the future, as needed.

**Legislative and Regulatory Actions:**

• ***Regulatory Actions:***

Ms. Yeatts stated that the board’s periodic review is in the Governor’s office and will likely not be considered until after the General Assembly session.

• ***Legislative Actions:***

Ms. Yeatts informed the board of the following House and Senate Bills that may be of interest:

**HB1971** Health professions and facilities; adverse action in another jurisdiction.

**HB2228** Nursing and Psychology, Board of; health regulatory boards, staggered terms.

**HB2556** Health Professions, Dept. of, and health regulatory boards; information obtained in an investigation.

**HB2693** Qualified mental health professionals; regulations for registration.

**SB1106** Physical therapists & physical therapist assistants; licensure, Physical Therapy Licensure Compact

**SB1547** Music therapy; Board of Medicine to regulate practice.

**SB1773** Health regulatory boards; conversion therapy.

**SB1778** Health regulatory boards; conversion therapy.

• ***Consideration of Policy Action on Conversion Therapy:***

Ms. Yeatts and Dr. Stewart reported on the outcome of the interdisciplinary workgroup on conversion therapy, which was previously requested by the Board of Psychology and which convened at DHP on October 5, 2018 by Dr. Brown.

A motion was made by Dr. Ball to move forward with a guidance document, and to initiate regulatory action, to make clear the board’s position that conversion therapy with minors is a violation of standards of practice. The motion was seconded by Dr. Wallace and it passed with a unanimous vote.

After review of a draft guidance document addressing conversion therapy, Dr. Vauter moved to change "same" to "any". The motion was seconded by Dr. Ball and it passed with a unanimous vote.

Additionally, Dr. Ball moved to add "in any direction" to the end of the first paragraph in the draft guidance document. The motion was seconded by Ms. Bailey and it passed with a unanimous vote.

A motion was made by Dr. Sheras to accept the language in the draft guidance document, as amended. The motion was seconded by Ms. Bailey and it passed with a unanimous vote.

Ms. Bailey made a motion to delegate to the board Chairperson and the Chairperson for the Regulatory Committee the authority to review and approve the final version of the guidance document for publication. Dr. Vauter seconded the motion and it passed with a unanimous vote.

### **Staff Reports**

- ***Executive Director's Report***

Ms. Lang presented the most recent Expenditures and Revenue Summary (included in the meeting agenda packet). She further advised the board members that Jennifer Little, a citizen member of the board, recently resigned and that we will provide an update once we are notified of a new appointment to that seat.

Ms. Lang also reminded board members that the Conflict of Interest filing is due by February 1, 2019.

- ***Discipline Report***

Ms. Lang directed the board to the discipline report provided in the meeting agenda packet.

Ms. Evans provided the board with a compliance update and reported that she is currently monitoring three (3) licensees for compliance with terms of board orders.

Ms. Evans further provided an update on the 2018 Continuing Education Audit. She advised that 37 licensees were audited for the 2017-2018 renewal cycle. Of the audits, 27 licensees met the requirements, one (1) licensee was issued an advisory letter and three (3) are still in the review process. Six (6) licensees are out of compliance with the renewal requirements and will be processed based on the board's guidance document.

- ***Licensing Report***

Ms. Lang directed the board to the licensing report provided in the meeting agenda packet, and answered questions from board members.

### **Board Counsel Report:**

None.

### **Committee and Board Member Reports:**

- ***Board of Health Professions Report:***

Dr. Stewart reported that the Board of Health Professions continues to work on the opioid epidemic. He advised board members that if they have any suggestions or ideas, to follow up with him. Dr. Werth reported that he had a phone conversation with a regional SAMHSA administrator and noted that they are willing to work with the

behavioral health boards for additional training opportunities. Ms. Hoyle will follow up with the SAMHSA contact to advise her of this board's interest.

The Board of Health Professions voted to accept the recommendation of the Regulatory Research Committee to license Art Therapists in Virginia. However, Ms. Hoyle noted that to date, there is not a pending Bill in the General Assembly for Art Therapists.

- ***Legislative/Regulatory Committee Report:***

Dr. Werth reported that the January meeting of the Regulatory Committee was canceled. The Committee will meet next on April 1, 2019, prior to the next Quarterly Board Meeting.

**Unfinished Business:**

None

**New Business:**

Dr. Wallace advised the board of another pending House Bill (HB1735) to establish the Commission on Student Behavioral Health as a legislative branch commission.

**Next Meeting:**

The next Quarterly Board Meeting will be held on April 2, 2019.

**Adjournment:**

The meeting adjourned at 2:06 p.m.

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Herbert Lee Stewart, Ph.D., LCP, Chairperson  
Virginia Board of Psychology

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Date

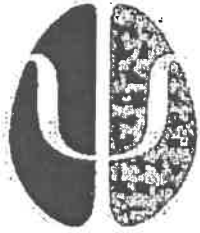
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Jaime Hoyle, JD, Executive Director  
Virginia Board of Psychology

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Date

## ATTACHMENT A



# VACP

Virginia Academy of Clinical Psychologists

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Glen Allen, VA 23060  
Phone (804) 643-5614  
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VACPOffice@gmail.com  
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The Virginia Academy of Clinical Psychologists recommends the following as related to "conversion therapy" or engaging in sexual orientation change efforts:

- Significant research by both the American Psychological Association and the American Psychiatric Association substantiate that "conversion therapy" should be prohibited in that it has the potential to be harmful to patients.
- "Conversion therapy" or efforts to change a person's sexual orientation" shall mean any practice or treatment that seeks to change an individual's sexual orientation or gender identity, including efforts to change behaviors or gender expressions or to eliminate or reduce sexual or romantic attractions or feelings toward individuals of the same gender, especially for persons under the age of eighteen.
- "Conversion therapy" does not include counseling that provides assistance to a person undergoing gender transition, or counseling that provides acceptance, support, and understanding of a person or facilitates a person's coping, social support, and identity exploration and development, including sexual-orientation-neutral interventions to prevent or address unlawful conduct or unsafe sexual practices, as long as such counseling does not seek to change an individual's sexual orientation or gender identity.
- "Conversion therapy" should be considered as a violation standards practice in that rendering such services is considered as having real potential of jeopardizing the health and well-being of patients.
- Above should be promptly adopted, as an emergency regulation if possible, and that this this regulatory policy be adopted so that it applies to any person licensed by a regulatory Board of the Virginia Department of Health Professions who performs counseling as part of their training, including those professions licensed by the Boards of Psychology, Counseling, Nurses and Medicine (meaning all such Boards would adopt such.)
- The Virginia Board of Psychology proceed immediately with the promulgation of such regulation as to set an example for other Boars under the Department.

(Note: This policy, if adopted as regulations, would NOT apply to exempt persons. Exempted are "non profit" (pastoral care) and clergy as they are exempt from licensure requirements relating to counseling services.)

Adopted April 18, 2018  
Board of Directors  
Virginia Academy of Clinical Psychologists

**Agenda Item: Regulatory Actions - Chart of Regulatory Actions  
As of March 26, 2019**

Board		Board of Psychology
Chapter	Action / Stage Information	
[18 VAC 125 - 20]	Regulations Governing the Practice of Psychology	<u>Unprofessional conduct/conversion therapy</u> [Action 5218] NOIRA - At Secretary's Office for 40 days
[18 VAC 125 - 20]	Regulations Governing the Practice of Psychology	<u>Result of Periodic Review</u> [Action 4897] Proposed - At Governor's Office for 121 days

## Report of the 2019 General Assembly

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### **HB 1971 Health professions and facilities; adverse action in another jurisdiction.**

*Chief patron:* Stolle

*Summary as introduced:*

**Health professions and facilities; adverse action in another jurisdiction.** Provides that the mandatory suspension of a license, certificate, or registration of a health professional by the Director of the Department of Health Professions is not required when the license, certificate, or registration of a health professional is revoked, suspended, or surrendered in another jurisdiction based on disciplinary action or mandatory suspension in the Commonwealth. The bill extends the time by which the Board of Pharmacy (Board) is required to hold a hearing after receiving an application for reinstatement from a nonresident pharmacy whose registration has been suspended by the Board based on revocation or suspension in another jurisdiction from not later than its next regular meeting after the expiration of 30 days from receipt of the reinstatement application to not later than its next regular meeting after the expiration of 60 days from receipt of the reinstatement application.

### **HB 2228 Nursing and Psychology, Boards of; health regulatory boards, staggered terms.**

*Chief patron:* Bagby

*Summary as introduced:*

**Composition of the Boards of Nursing and Psychology; health regulatory boards; staggered terms.** Alters the composition of the Board of Nursing and replaces the requirement that the Board of Nursing meet each January with the requirement that it meet at least annually. The bill also removes specific officer titles from the requirement that the Board of Nursing elect officers from its membership. The bill replaces the requirement that a member of the Board of Psychology be licensed as an applied psychologist with the requirement that that position be filled by a member who is licensed in any category of psychology. The bill also provides a mechanism for evenly staggering the terms of members of the following health regulatory boards, without affecting the terms of current members: Board of Nursing, Board of Psychology, Board of Dentistry, Board of Long-Term Care Administrators, Board of Medicine, Board of Veterinary Medicine, Board of Audiology and Speech-Language Pathology, Board of Pharmacy, and Board of Counseling.

### **HB 2556 Health Professions, Dept of, and health regulatory boards; information obtained in an investigation.**

*Chief patron:* Plum

*Summary as introduced:*

**Department of Health Professions and health regulatory boards; information obtained in an investigation or disciplinary proceeding; authorized disclosures.** Provides that provisions protecting the confidentiality of information obtained during an investigation or disciplinary hearing do not prohibit the disclosure of information about a suspected violation of state or federal law or regulation to state law enforcement. Under current law, such disclosure is authorized only to agencies within the Health and Human Resources Secretariat or to federal law-enforcement agencies. The bill also provides that investigative staff of agencies to which disclosure is authorized are not prohibited from interviewing fact witnesses, disclosing to fact witnesses the identity of the subject of the complaint or report, or reviewing with fact witnesses

any portion of records or other supporting documentation necessary to refresh the fact witnesses' recollection.

**HB 2693 Qualified mental health professionals; regulations for registration.**

*Chief patron:* Price

*Summary as introduced:*

**Qualified mental health professionals.** Requires the Board of Counseling to promulgate regulations for the registration of persons receiving supervised training in order to qualify as a qualified mental health professional. The bill defines the terms "qualified mental health professional-adult," "qualified mental health professional-child," and "qualified mental health professional-trainee." This bill is identical to SB 1694.

**SB 1106 Physical therapists & physical therapist assistants; licensure, Physical Therapy Licensure Compact.**

*Chief patron:* Peake

*Summary as introduced:*

**Licensure of physical therapists and physical therapist assistants; Physical Therapy Licensure Compact.** Authorizes Virginia to become a signatory to the Physical Therapy Licensure Compact. The Compact permits eligible licensed physical therapists and physical therapist assistants to practice in Compact member states, provided they are licensed in at least one member state. In addition, the bill requires each applicant for licensure in the Commonwealth as a physical therapist or physical therapist assistant to submit fingerprints and provide personal descriptive information in order for the Board to receive a state and federal criminal history record report for each applicant. The bill has a delayed effective date of January 1, 2020, and directs the Board of Physical Therapy to adopt emergency regulations to implement the provisions of the bill.

**SB 1547 Music therapists; Board of Health Professions to evaluate regulation.**

*Chief patron:* Vogel

*Summary as passed:*

**Music therapy.** Directs the Board of Health Professions to evaluate whether music therapists and the practice of music therapy should be regulated and the degree of regulation to be imposed. The bill requires the Board to report the results of its evaluation to the Chairmen of the Senate Committee on Education and Health and the House Committee on Health, Welfare and Institutions by November 1, 2019.



# VIRGINIA ACTS OF ASSEMBLY -- 2019 SESSION

## CHAPTER 169

*An Act to amend and reenact §§ 54.1-3002 and 54.1-3603 of the Code of Virginia, relating to composition of the Boards of Nursing and Psychology; health regulatory boards; staggered terms.*

[H 2228]

Approved February 27, 2019

**Be it enacted by the General Assembly of Virginia:**

- 1. That §§ 54.1-3002 and 54.1-3603 of the Code of Virginia are amended and reenacted as follows:  
§ 54.1-3002. Board of Nursing; membership; terms; meetings; quorum; administrative officer.**

The Board of Nursing shall consist of 14 members as follows: eight registered nurses, at least two of whom are licensed nurse practitioners; ~~three~~ *two* licensed practical nurses; ~~and~~ three citizen members; *and one member who shall be a registered nurse or a licensed practical nurse.* The terms of office of the Board shall be four years.

The Board shall meet ~~each January~~ *at least annually* and shall elect *officers* from its membership a ~~president, a vice president, and a secretary.~~ It may hold such other meetings as may be necessary to perform its duties. A majority of the Board including one of its officers shall constitute a quorum for the conduct of business at any meeting. Special meetings of the Board shall be called by the administrative officer upon written request of two members.

The Board shall have an administrative officer who shall be a registered nurse.

**§ 54.1-3603. Board of Psychology; membership.**

The Board of Psychology shall regulate the practice of psychology. The membership of the Board shall be representative of the practices of psychology and shall consist of nine members as follows: five persons who are licensed as clinical psychologists, one person licensed as a school psychologist, one person licensed as an ~~applied~~ *psychologist in any category of psychology*, and two citizen members. At least one of the seven psychologist members of the Board shall be a member of the faculty at an accredited institution of higher education in the Commonwealth actively engaged in teaching psychology. The terms of the members of the Board shall be four years.

- 2. That for appointments to the Board of Nursing pursuant to § 54.1-3002 of the Code of Virginia, as amended by this act, that are set to begin July 1, 2021, one registered nurse and one licensed practical nurse shall be appointed for a term of one year, and any remaining appointments shall be for a term of four years. Thereafter, all appointments to the Board of Nursing shall be for a term of four years, as provided in § 54.1-3002 of the Code of Virginia, as amended by this act.**

- 3. That for appointments to the Board of Psychology pursuant to § 54.1-3603 of the Code of Virginia, as amended by this act, that are set to begin July 1, 2020, one member shall be appointed for a term of one year, one member shall be appointed for a term of two years, and any remaining appointments shall be for a term of four years. Thereafter, all appointments to the Board of Psychology shall be for a term of four years, as provided in § 54.1-3603 of the Code of Virginia, as amended by this act.**

- 4. That for appointments to the Board of Dentistry pursuant to § 54.1-2702 of the Code of Virginia that are set to begin July 1, 2020, one member shall be appointed for a term of one year, one member shall be appointed for a term of two years, and any remaining appointments shall be for a term of four years. Thereafter, all appointments to the Board of Dentistry shall be for a term of four years, as provided in § 54.1-2702 of the Code of Virginia.**

- 5. That for appointments to the Board of Long-Term Care Administrators pursuant to § 54.1-3101 of the Code of Virginia that are set to begin July 1, 2019, one licensed nursing home administrator and one assisted living facility administrator shall be appointed for a term of one year, and any remaining appointments shall be for a term of four years. Thereafter, all appointments to the Board of Long-Term Care Administrators shall be for a term of four years, as provided in § 54.1-3101 of the Code of Virginia.**

- 6. That for appointments to the Board of Medicine pursuant to § 54.1-2911 of the Code of Virginia that are set to begin July 1, 2020, three members shall be appointed for a term of two years, and any remaining appointments shall be for a term of four years. Thereafter, all appointments to the Board of Medicine shall be for a term of four years, as provided in § 54.1-2911 of the Code of Virginia.**

- 7. That for appointments to the Board of Veterinary Medicine pursuant to § 54.1-3802 of the Code of Virginia that are set to begin July 1, 2019, the citizen member shall be appointed for a term of three years, and any remaining appointments shall be for a term of four years. Thereafter, all appointments to the Board of Veterinary Medicine shall be for a term of four years, as provided in § 54.1-3802 of the Code of Virginia.**

8. That for appointments to the Board of Audiology and Speech-Language Pathology pursuant to § 54.1-2602 of the Code of Virginia that are set to begin July 1, 2022, one speech-language pathologist shall be appointed for a term of two years, and any remaining appointments shall be for a term of four years. Thereafter, all appointments to the Board of Audiology and Speech-Language Pathology shall be for a term of four years, as provided in § 54.1-2602 of the Code of Virginia.

9. That for appointments to the Board of Pharmacy pursuant to § 54.1-3305 of the Code of Virginia that are set to begin July 1, 2022, one citizen member and one pharmacist shall be appointed for a term of three years, and any remaining appointments shall be for a term of four years. Thereafter, all appointments to the Board of Pharmacy shall be for a term of four years, as provided in § 54.1-3305 of the Code of Virginia.

10. That for appointments to the Board of Counseling pursuant to § 54.1-3503 of the Code of Virginia that are set to begin July 1, 2021, one member shall be appointed for a term of two years, two members shall be appointed for a term of three years, and any remaining appointments shall be for a term of four years. Thereafter, all appointments to the Board of Counseling shall be for a term of four years, as provided in § 54.1-3503 of the Code of Virginia.

**Agenda Item: Consideration of comment on guidance document –  
Conversion Therapy**

Included in the agenda package:

Copy of guidance documents adopted by the Board in January

Copies of comments on guidance document

Copy of law (Code of Virginia) on guidance documents

Action:

Decision on Guidance Document and response to comment (A summary of all comments will be provided at the meeting)

## Virginia Board of Psychology

### Guidance Document on the Practice of Conversion Therapy

For the purposes of this guidance "conversion therapy" or "sexual orientation change efforts" is defined as any practice or treatment that seeks to change an individual's sexual orientation or gender identity, including efforts to change behaviors or gender expressions or to eliminate or reduce sexual or romantic attractions or feelings toward individuals of any<sup>i</sup> gender. "Conversion therapy" does not include counseling that provides assistance to a person undergoing gender transition or counseling that provides acceptance, support, and understanding of a person or facilitates a person's coping, social support, and identity exploration and development, including sexual-orientation-neutral interventions to prevent or address unlawful conduct or unsafe sexual practices, as long as such counseling does not seek to change an individual's sexual orientation or gender identity in any direction.

In 18VAC125-20-150 of the *Regulations Governing the Practice of Psychology* ("Regulations"), the Virginia Board of Psychology ("Board") has stated that "[t]he protection of the public health, safety, and welfare and the best interest of the public shall be the primary guide in determining the appropriate professional conduct of all persons whose activities are regulated by the board. Psychologists respect the rights, dignity and worth of all people, and are mindful of individual differences."

One of the standards of practice established in the Regulations is that persons licensed or registered by the Board shall:

*"Avoid harming patients or clients, research participants, students and others for whom they provide professional services and minimize harm when it is foreseeable and unavoidable."*  
18VAC125-20-150(B)(5).

Many national behavioral health and medical associations have issued position and policy statements regarding conversion therapy/sexual orientation change efforts, especially with minors. Such statements have typically noted that conversion therapy has not been shown to be effective or safe.

Consistent with established positions by the American Psychological Association, National Association of School Psychologists, and Virginia Academy of Clinical Psychologists (see below), the Board considers "conversion therapy" or "sexual orientation change efforts" (as defined above) to be services that have the potential to harm patients or clients, especially minors. Thus, under the Regulations governing applied, clinical, and school psychologists and others licensed or registered by the Board, practicing conversion therapy/sexual orientation change efforts with minors could result in a finding of misconduct and disciplinary action against the licensee or registrant.

An email communication to the Board, dated May 7, 2018, stated the position of the Virginia Academy of Clinical Psychologists (VACP).

The following was unanimously approved by the VACP Board of Directors and represents the official position statement of VACP:

- *Significant research by both the American Psychological Association and the American Psychiatric Association substantiates that “conversion therapy” should be prohibited in that it has the potential to be harmful to patients. “Conversion therapy,” or, “efforts to change a person’s sexual orientation” shall mean any practice or treatment that seeks to change an individual’s sexual orientation or gender identity, including efforts to change behaviors or gender expressions, or to eliminate or reduce sexual or romantic attractions or feelings toward individuals of the same gender. “Conversion therapy” does not include counseling that provides assistance to a person undergoing gender transition, or counseling that provides acceptance, support, and understanding of a person, or facilitates a person’s coping, social support, and identity exploration and development. This includes sexual-orientation-neutral interventions to prevent or address unlawful conduct or unsafe sexual practices, as long as such counseling does not seek to change an individual’s sexual orientation or gender identity.*
- *It is the stance of VACP that “Conversion therapy” should be considered as a violation of standards of practice in that rendering such services is considered to have real potential of jeopardizing the health and well-being of patients.*

The American Psychological Association has issued several statements related to this subject, including:

“Appropriate Affirmative Responses to Sexual Orientation Distress and Change Efforts” (2010) [<https://www.apa.org/about/policy/sexual-orientation.pdf>] :

... On the basis of the Task Force’s findings, the APA encourages mental health professionals to provide assistance to those who seek sexual orientation change by utilizing affirmative multiculturally competent and client-centered approaches that recognize the negative impact of social stigma on sexual minorities and balance ethical principles of beneficence and nonmaleficence, justice, and respect for people’s rights and dignity. [note: internal footnotes and references deleted for readability]

... Be it further resolved that the [American Psychological Association] concludes that there is insufficient evidence to support the use of psychological interventions to change sexual orientation;

...Be it further resolved that the [American Psychological Association] advises patients, guardians, young people, and their families to avoid sexual orientation change efforts that portray homosexuality as a mental illness or developmental disorder and to seek psychotherapy, social support, and educational services that provide accurate information on sexual orientation and sexuality, increase family and social support, and reduce rejection of sexual minority youth....

The National Association of School Psychologists stated in its Position Statement on “Safe and Supportive Schools for LGBTQ+ Youth” (2017) that:

The National Association of School Psychologists (NASP) believes school psychologists are ethically obligated to ensure all youth with diverse sexual orientations, gender identities, and/or gender expressions, are able to develop and express their personal identities in a school climate that is safe, accepting, and respectful of all persons and free from discrimination, harassment, violence, and abuse. Specifically, NASP's ethical guidelines require school psychologists to promote fairness and justice, help to cultivate safe and welcoming school climates, and work to identify and reform both social and system-level patterns of injustice (NASP, 2010, pp. 11–12). NASP further asserts all youth are entitled to equal opportunities to participate in and benefit from affirming and supportive educational and mental health services within schools. As such, any efforts to change one's sexual orientation or gender identity are unethical, are illegal in some states, and have the potential to do irreparable damage to youth development (Just the Facts Coalition, 2008 (*emphasis added*)). The acronym LGBTQ+ is intended to be inclusive of students of diverse sexual orientations, gender identities, and/or gender expressions, and the term youth is inclusive of all children, adolescents, and young adults.

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<sup>i</sup> Because of the evolving nature of terminology in this area, both the American Psychological Association and National Association of School Psychologists have included definitions in their documents related to sexual orientation and gender expression. Of special note, these definitions have made it clear that adhering to a binary construction of gender (male OR female) is inconsistent with evolving descriptions of self and others. For example, in its "Guidelines for Psychological Practice with Transgender and Gender Nonconforming People," the American Psychological Association stated in Guideline 1 that "Psychologists understand that gender is a nonbinary construct that allows for a range of gender identities and that a person's gender identity may not align with sex assigned at birth." (p. 3) [<https://www.apa.org/practice/guidelines/transgender.pdf>]. Thus, the definition above refers to "any" gender and "in any direction" instead of referring specifically to "same" gender attraction.

## Code of Virginia

### § 2.2-4002.1. (Effective January 1, 2019) Guidance documents.

A. Guidance documents shall be exempt from the provisions of this chapter, pursuant to this section. Guidance documents do not include agency (i) rulings and advisory opinions, (ii) forms and instructions, (iii) bulletins and legislative summaries, (iv) studies and reports, and (v) internal manuals and memoranda.

B. The agency that develops a guidance document shall certify that the document conforms to the definition of a guidance document in § 2.2-4101.

The guidance document shall be subject to a 30-day public comment period, to include public comment through the Virginia Regulatory Town Hall website, after publication in the Virginia Register of Regulations and prior to its effective date.

The agency shall provide notice of the opportunity for public comment to interested parties as identified under § 2.2-4007.02 prior to the start of the 30-day public comment period.

C. If a written comment is received during a public comment period asserting that the guidance document is contrary to state law or regulation, or that the document should not be exempted from the provisions of this chapter, the effective date of the guidance document by the agency shall be delayed for an additional 30-day period. During this additional period, the agency shall respond to any such comments in writing by certified mail to the commenter or by posting the response electronically in a manner consistent with the provisions for publication of comments on regulations provided in this chapter. Any person who remains aggrieved after the effective date of the final guidance document may avail himself of the remedies articulated in Article 5 (§ 2.2-4025 et seq.).

2018, c. 820.

## Comments of Conversion Therapy Guidance Board of Psychology

From: **Donna Miller** <[drmillernluray@gmail.com](mailto:drmillernluray@gmail.com)>  
Date: Sat, Mar 9, 2019 at 2:37 PM  
Subject: The statue of religious freedom  
To: <[psy@dhp.virginia.gov](mailto:psy@dhp.virginia.gov)>

please help stop parents from pushing to have their children's sex identity changed before a child is old enough to realize what is happening.

Sincerely,  
Donna Miller, RN, BSN, CEN

---

From: **Joshua Miller** <[jmillsbux@gmail.com](mailto:jmillsbux@gmail.com)>  
Date: Wed, Feb 27, 2019 at 11:29 AM  
Subject: Conversion Therapy  
To: <[psy@dhp.virginia.gov](mailto:psy@dhp.virginia.gov)>

To whom it may concern:

The Statute of Religious Freedom in our state Constitution clearly protects religious freedom for all Virginians. The new guidance document that bans conversion therapy not only is a violation of that Statute, it limits the options for those who are seeking help with their unwanted same-sex attraction. There are several who have benefited from this form of therapy. I'm asking that all changes that undermine our first freedoms, including the proposed changes to conversion therapy, not be approved.

Thank you,  
Josh Miller

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From: **Joyce Diepold** <[joyce.a.diepold@gmail.com](mailto:joyce.a.diepold@gmail.com)>  
Date: Wed, Feb 27, 2019 at 11:08 AM  
Subject: The Statute of Religious Freedom in our state Constitution  
To: <[psy@dhp.virginia.gov](mailto:psy@dhp.virginia.gov)>

*The Statute of Religious Freedom in our state Constitution clearly protects religious freedom for all Virginians. The new guidance document that bans conversion therapy not only is a violation of that Statute, it limits the options for those who are seeking help with their unwanted same-sex attraction. There are several who have benefitted from this form of therapy. I'm asking that all changes that undermine our first freedoms, including the proposed changes to conversion therapy, not be approved.*



Joyce Diepold

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From: **Lisa ODonnell** <[lispodonnell@gmail.com](mailto:lispodonnell@gmail.com)>  
Date: Wed, Feb 27, 2019 at 12:43 PM  
Subject: Conversion therapy  
To: <[psy@dhp.virginia.gov](mailto:psy@dhp.virginia.gov)>

I understand that regulations are being considered regarding conversion therapy. I believe this therapy is dangerous and should not be permitted in Va without full and complete disclosure of potential risks and disclosure of research demonstrating low success rates. As an attorney with more than 20 years of experience in medical malpractice cases, I believe our LGBT community deserves the same right to informed consent as all other patients seeking medical care. The medical profession as a whole will lose prestige if allowed to violate civil rights of a class of patients.

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From: **Melinda Patterson** <[mpatterson@mccag.org](mailto:mpatterson@mccag.org)>  
Date: Wed, Feb 27, 2019 at 1:40 PM  
Subject: Proposed guidance document  
To: <[psy@dhp.virginia.gov](mailto:psy@dhp.virginia.gov)>

To: Virginia Board of Psychology

It is my opinion that the new guidance document that bans conversion therapy is a violation of the Statute of Religious Freedom found in the Virginia Constitution. If this document were to be approved it would further undermine our first freedoms. I am asking that this proposed document not be approved.

Thank you,  
Melinda Patterson  
(804) 647-0794

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From: **David Levenson** <[david.r.levenson@gmail.com](mailto:david.r.levenson@gmail.com)>  
Date: Wed, Feb 27, 2019 at 3:09 PM  
Subject: Proposed Conversion Therapy changes  
To: <[psy@dhp.virginia.gov](mailto:psy@dhp.virginia.gov)>

*Dear Virginia Board of Psychology, The Statute of Religious Freedom in our state Constitution clearly protects religious freedom for all Virginians. The new guidance document that bans conversion therapy not only is a violation of that Statute, it limits the options for those who are seeking help with their unwanted same-sex attraction. There are several who have benefitted from this form of therapy. I'm asking that all changes that undermine our first freedoms, including the proposed changes to conversion therapy, not be approved.*

Sincerely, David R. Levenson  
144 Southport  
Williamsburg, VA 23188

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From: **Karen Hicks** <[karenhicks250@gmail.com](mailto:karenhicks250@gmail.com)>  
Date: Wed, Feb 27, 2019 at 10:27 PM  
Subject: Don't undermine religious freedom in our state constitution  
To: <[psy@dhp.virginia.gov](mailto:psy@dhp.virginia.gov)>

*"The Statute of Religious Freedom in our state Constitution clearly protects religious freedom for all Virginians. The new guidance document that bans conversion therapy not only is a violation of that Statute, it limits the options for those who are seeking help with their unwanted same-sex attraction. There are several who have benefited from this form of therapy. I'm asking that all changes that undermine our first freedoms, including the proposed changes to conversion therapy, not be approved. It is not your job to change our constitution.*

---

From: **Steve & Betty** <[saiello5@verizon.net](mailto:saiello5@verizon.net)>  
Date: Thu, Feb 28, 2019 at 8:09 AM  
Subject: Conversion therapy  
To: <[psy@dhp.virginia.gov](mailto:psy@dhp.virginia.gov)>

Dear Sirs and Madams,

*The Statute of Religious Freedom in our state Constitution clearly protects religious freedom for all Virginians. The new guidance document that bans conversion therapy not only is a violation of that Statute, it limits the options for those who are seeking help with their unwanted same-sex attraction. There are several who have benefitted from this form of therapy. I'm asking that all changes that undermine our first freedoms, including the proposed changes to conversion therapy, not be approved.*  
Thank you.

Respectfully yours,

Betty Aiello

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From: **Samuel Brown** <[samibone@aol.com](mailto:samibone@aol.com)>  
Date: Thu, Feb 28, 2019 at 6:15 PM  
Subject: Conversion therapy  
To: <[psy@dhp.virginia.gov](mailto:psy@dhp.virginia.gov)>

To whom it may concern:

The ban on conversion therapy is clearly a violation of the religious freedom set forth in our federal & state constitutions.

Those who are seeking advice / guidance regarding unwanted same sex attractions, are having their rights denied as a result of this type of legislation.

It is time to allow any type of psychological therapy to be available to these people with gender confusion issues!

Please do not stand in their way & force your own bias on them.

Thank you for your attention.

Samuel I Brown MD

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From: **Ted Williams** <[pastort49@gmail.com](mailto:pastort49@gmail.com)>  
Date: Mon, Mar 4, 2019 at 3:26 AM  
Subject: Conversion Therapy  
To: <[psy@dhp.virginia.gov](mailto:psy@dhp.virginia.gov)>

TO WHOM IT MAY CONCERN:

As a pastor and a concerned citizen of Virginia, I stand with the Family Foundation and other groups in opposition to any legislation or resolution that would stand in the way of individuals seeking help with same-sex desires and transgender motivations when they personally desire intervention. Much false information has been spread concerning these therapies and preventing the help needed in these

individual's lives would be wrong and harmful. We as a church are open to any person who enters our house of worship as long as they are there peacefully and with a desire to worship in spirit and truth. However we do stand in opposition to those who would remove the hope that comes from the work of therapists who seek to intercede for folks who desire escape from unwanted desires.

Thank you for listening.

Dr. G. Ted Williams

Senior Pastor

Mechanicsville Baptist Church (Gordonsville, VA)

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From: **Sheila Secrist** <sheila.secrisr@yahoo.com>

Date: Mon, Mar 4, 2019 at 6:40 PM

Subject: Banning help for those who see help

To: [psy@dhp.virginia.gov](mailto:psy@dhp.virginia.gov) <[psy@dhp.virginia.gov](mailto:psy@dhp.virginia.gov)>

Dear Sir and Madame:

How can you even consider banning conversion therapy so that those seeking help can't get it?! Would you ban therapy for a schizophrenic? Would you ban therapy for the depressed?

Please do not even consider for a single moment banning help to those who are seeking help. Instead, I ask you to consider that those wanting to ban this help may have completely selfish reasons for doing so, for increasing their numbers, etc. At the risk of, and without concern for, those who are suffering and want help. You just never ever bar someone from getting help when they seek it - to do so would be criminal and goes against everything psychology stands for.

*The Statute of Religious Freedom in our state Constitution clearly protects religious freedom for all Virginians. The new guidance document that bans conversion therapy not only is a violation of that Statute, it limits the options for those who are seeking help with their unwanted same-sex attraction. There are several who have benefitted from this form of therapy. I'm asking that all changes that undermine our first freedoms, including the proposed changes to conversion therapy, not be approved.*

I pray that you will see the truth in these statements. Because a state like California is doing any given thing does not make it appropriate and it doesn't make it "okay" or "right" and it is certainly not what is best for the patient.

Respectfully submitted,

Mrs. Sheila Secrist

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Dear Colleagues,

Please let this serve as my comment on the Guidance Document on the Practice of Conversion Therapy. After reviewing the guidance document, I have a number of questions regarding how this document will affect members of the public seeking psychological services.

1. The definition of "conversion therapy" or "sexual orientation change efforts" includes "efforts to change behaviors." How is this to be applied in situations where clients or prospective clients seek psychological services to reduce sexual behaviors which they find problematic or distressing? For example, if a client desires to decrease their sexual promiscuity or increase the practice of chastity, how would this be impacted by the proposed document?

2. If clients or prospective clients are seeking out services that are expressly aimed at a change of behavior, is it in the best interest of the public to restrict their access to these services?
3. Finally, given the clarity in the Virginia Regulations Governing the Practice of Psychology as it relates to the duty of the Psychologist to avoid harming clients as detailed in 18VAC125-20-150(B)(5), what is the purpose of this additional guidance document? Have there been ethics complaints or violations against Licensed Psychologists that were not able to be adequately addressed by the Regulations as they are currently written?

I look forward to additional clarification in this matter as we collectively strive to assist our clients in their pursuit of genuine health and flourishing.

Sincerely,

**Michael K. Horne, PsyD**

*Licensed Clinical Psychologist (VA #4340)*

*Director of Clinical Services*

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Dear Colleagues,

Please accept and consider this comment on the Guidance Document on the Practice of Conversion Therapy. I have concerns regarding how these guidelines would affect people seeking psychological services for assistance with unwanted or troubling habits or behaviors. First, the document overall appears to violate a core tenant of the Ethical Principles of Psychologists (Principle E - Respect for peoples rights and dignity) which states that "Psychologists respect the dignity and worth of all people, and the rights of individuals to privacy, confidentiality, and self-determination." In particular, the ideal of self-determination in the document is hampered by the guidelines defining what type of sexual preferences, inclinations, and goals may or may not be addressed in therapy. If clients seek services that are aimed at a particular change of behavior that will facilitate their growth and flourishing, it is in their best interest for a therapist to provide assistance and support. A related concern would have to do with how the guidance would impact therapeutic work with those who consider themselves to have sexual compulsions that interfere with their ability to to function optimally at work or in relationships. The definition includes a language that would make it problematic to make "efforts to change behaviors... or reduce sexual ... feelings". This would impair the ability of psychologists to meet the needs of clients who are feeling out of control and want to improve self-mastery, a commonly hoped for outcome of treatment. Finally, the Virginia

regulations governing psychology practice already stipulate that it is the duty of the psychologist to avoid harm to clients (18 VAC 125-20 ...), such that the additional guidance here does not provide any further assistance to the ethical practice of psychology.

Sincerely,  
Frank J Moncher, PhD  
Licensed Clinical Psychologist (VA #2824)

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Virginia.gov Agencies | Governor



Logged in as

Elaine J. Yeatts

Agency

Department of Health Professions

Board

Board of Psychology

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Commenter: Kirsten O'Nell

3/12/19 8:17 am

**Conversion Therapy is Torture**

15 states already ban conversion therapy due to the harm it imposes on participants. There is absolutely nothing wrong with being LGBTQI but there is something deeply wrong with someone who preaches conversion therapy. Conversion therapy actively harms a person's self worth and that is with them for life. Ban this awful practice for good.

Commenter: Alliance for a Progressive Virginia

3/14/19 6:29 pm

**APV supports Guidance Document 125-9, on the Practice of Conversion Therapy**

Dear Virginia Board of Psychology,

The Alliance for a Progressive Virginia is pleased to support **Guidance Document 125-9, on the Practice of Conversion Therapy**, which would protect youth under the age of 18 from so-called "conversion therapy" at the hands of licensed psychologists in Virginia. APV is an all-volunteer, multi-issue organization with members throughout the Commonwealth. We are dedicated to promoting economic fairness, social justice and good government.

Conversion therapy, sometimes referred to as "reparative therapy," "ex-gay therapy," or "sexual orientation change efforts," is a medically useless and extremely dangerous set of practices by mental health providers that seek to change an individual's sexual orientation or gender identity. This includes efforts to change behaviors or to eliminate or reduce sexual or romantic attractions or feelings toward individuals of the same sex. To be clear, there is no evidence that these techniques can accomplish what they claim to be able to do. Instead there is strong evidence that SOCE is a dangerous and destructive practice especially when used on children. It is important to understand that conversion therapy does not include psychotherapy that aims to provide acceptance, support, and understanding of clients or the facilitation of clients' coping, social support, and identity exploration and development, including sexual orientation-neutral interventions to prevent or address unlawful conduct or unsafe sexual practices. Nor does it include counseling for a person seeking to transition from one gender to another. Conversion therapy presupposes a successful outcome and then attempts to force the "patient" into that outcome. The inevitable failure is always the fault of the subject and the damage done, especially to already vulnerable populations can be devastating.

There is no credible evidence that any type of psychotherapy can change a person's sexual orientation or gender identity. In fact, conversion therapy poses critical health risks to lesbian, gay, bisexual, transgender, and queer young people, including depression, shame, decreased self-esteem, social withdrawal, substance abuse, risky behavior, and even suicide. Nearly all the nation's leading mental health associations, including the American Psychiatric Association, the

American Psychological Association, the American Counseling Association, the National Association of Social Workers, and the American Academy of Pediatrics, and the American Association for Marriage and Family Therapy have examined conversion therapy and issued cautionary position statements on these practices.

Research shows that lesbian, gay, and bisexual (LGB) youth are 4 times more likely, and questioning youth are 3 times more likely to attempt suicide as their straight peers. Nearly half of young transgender people have seriously thought about taking their lives and one quarter report having made a suicide attempt. Young people who experience family rejection based on their sexual orientation, including being subjected to conversion therapy, face especially serious health risks. Research reveals that LGB young adults who report higher levels of family rejection during adolescence are 8.4 times more likely to report having attempted suicide, 5.9 times more likely to report high levels of depression, 3.4 times more likely to use illegal drugs, and 3.4 times more likely to report having engaged in unprotected sexual intercourse compared with peers from families that reported no or low levels of family rejection.

Existing law provides for licensing and regulation of various mental health professionals, including physicians and surgeons, psychologists, marriage and family therapists, clinical social workers, and licensed professional counselors.

Virginia law already prohibits discredited and unsafe practices by licensed therapists.

This guidance would prevent licensed mental health providers in Virginia from performing conversion therapy with a patient under 18 years of age, regardless of the willingness of a parent or guardian to authorize such efforts. The guidance will curb harmful practices known to produce lifelong damage to those who are subjected to them and help ensure the health and safety of LGBTQ youth. We thank you for proposing this important guidance.

Sincerely,

Rhonda Hening

President, Alliance for a Progressive Virginia

**Commenter:** Deborah Hawkins

3/18/19 5:56 am

### **Enforce a standard of care; clarify the practice of CT is unacceptable**

My name is Deborah Hawkins and I'm a Virginia licensed Marriage & Family Therapist. Our standards of practice say a licensed counselor shall: "Be able to justify all services rendered to clients as necessary and appropriate for diagnostic or therapeutic purposes"[1]. The APA determined in 1973...that's forty-five years ago...that homosexuality is not to be classified as a mental disorder. Therefore, a professional counselor cannot diagnosis nor treat homosexuality as a mental disorder.

Homophobic attitudes have been institutionalized in nearly every aspect of our society including social and religious circles. The strong desire to be like others and accepted may cause LGBTQ individuals and/or their families to want to identify with the dominant culture or their religious community, free from discrimination and social devaluation. As a group, LGBTQ children experience unique stressors and developmental challenges. They develop depression, anxiety, substance abuse, and suicidality at higher rates than those in the general population.[2] So there's an important role for counseling with this population dealing with homophobic stigma.

Psychologists must practice to an accepted standard of care. That means using "evidenced based" treatments – peer reviewed treatments that rely on methods proven to be safe and effective, with a goal of improve quality of life, relieve symptoms and boosting a sense of well-being. Evidenced-based treatments for children might be cognitive-behavioral therapy, family therapy and play

therapies. Conversion therapy is not evidence-based. It isn't really therapy at all: It's total, unadulterated quackery, a painful process of humiliation and degradation that only breeds shame, self-loathing, and despair. While contemporary versions are less shocking and extreme than those of the past, they are equally devoid of scientific validity and pose serious dangers —especially to minors.

Would we allow a *physician* to offer a similarly fraudulent treatment based on utterly debunked science? For example, would we support treating cancer by giving a regime of coffee enemas and vitamins? There is no evidence that efforts to alter sexual orientation or gender identity by CT talk therapy are effective, beneficial, or necessary, and since CT interventions carry the risk of significant harm, they are contraindicated.[3] [4] Additionally standards say that psychologists must practice only within the boundaries of their competence, based on their education, training, supervised experience and appropriate professional experience. There is no Virginia accredited college, university, or continuing ed course that teaches or provides residents supervision on conversion therapy. Therefore, a psychologist cannot legitimately be competent in CT.

To summarize, conversion therapy is 1. unethical as it doesn't meet an acceptable standard of care; 2. No psychologist could have received accredited training for it. 3. it is immensely harmful quackery. Government cannot free people from stigma. However, you can combat stigma by banning the use of CT by licensed psychologists.

Thank you. Deborah Hawkins, L.M.F.T. license # 071700110

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[1] Virginia Board of Counseling, Standards of Practice, Section 18VAC115-20-130

[2] Cochran SD, Mays VM, Sullivan JG. Prevalence of mental disorders, psychological distress, and mental health services use among lesbian, gay, and bisexual adults in the United States. *J Consult Clin Psychol.* 2003;71:53-61.

[3] American Academy of Child and Adolescent Psychiatry. Policy Statement on Sexual Orientation, Gender Identity, and Civil Rights, revised and approved by Council 2009. Available at: [http://www.aacap.org/cs/root/policy\\_statements/sexual\\_orientation\\_gender\\_identity\\_and\\_civil\\_rights](http://www.aacap.org/cs/root/policy_statements/sexual_orientation_gender_identity_and_civil_rights). Accessed September 30, 2011.

[4] American Psychiatric Association. Position statement on therapies focused on attempts to change sexual orientation (reparative or conversion therapies). *Am J Psychiatry.* 2000;157:1719- 1721

**Commenter:** Equality Virginia

3/18/19 3:49 pm

**Re:** Support for Guidance Document 125-9, on the Practice of Conversion Therapy

Dear Virginia Board of Psychology,

Equality Virginia is pleased to support **Guidance Document 125-9, on the Practice of Conversion Therapy**, which would protect youth under the age of 18 from so-called "conversion therapy" at the hands of licensed psychologists in Virginia. Equality Virginia is the leading



advocacy organization in Virginia seeking equality for lesbian, gay, bisexual, and transgender people.

Conversion therapy, sometimes referred to as “reparative therapy,” “ex-gay therapy,” or “sexual orientation change efforts,” is a set of practices by mental health providers that seek to change an individual’s sexual orientation or gender identity. This includes efforts to change behaviors or to eliminate or reduce sexual or romantic attractions or feelings toward individuals of the same sex. Conversion therapy does not include psychotherapy that aims to provide acceptance, support, and understanding of clients or the facilitation of clients’ coping, social support, and identity exploration and development, including sexual orientation-neutral interventions to prevent or address unlawful conduct or unsafe sexual practices. Nor does it include counseling for a person seeking to transition from one gender to another.

There is no credible evidence that any type of psychotherapy can change a person’s sexual orientation or gender identity. In fact, conversion therapy poses critical health risks to lesbian, gay, bisexual, transgender, and queer young people, including depression, shame, decreased self-esteem, social withdrawal, substance abuse, risky behavior, and even suicide. Nearly all the nation’s leading mental health associations, including the American Psychiatric Association, the American Psychological Association, the American Counseling Association, the National Association of Social Workers, the American Academy of Pediatrics, and the American Association for Marriage and Family Therapy have examined conversion therapy and issued cautionary position statements on these practices.

Research shows that lesbian, gay, and bisexual (LGB) youth are 4 times more likely, and questioning youth are 3 times more likely to attempt suicide as their straight peers.[1] Nearly half of young transgender people have seriously thought about taking their lives and one quarter report having made a suicide attempt.[2] Young people who experience family rejection based on their sexual orientation, including being subjected to conversion therapy, face especially serious health risks. Research reveals that LGB young adults who report higher levels of family rejection during adolescence are 8.4 times more likely to report having attempted suicide, 5.9 times more likely to report high levels of depression, 3.4 times more likely to use illegal drugs, and 3.4 times more likely to report having engaged in unprotected sexual intercourse compared with peers from families that reported no or low levels of family rejection.[3]

Virginia law already prohibits discredited and unsafe practices by licensed therapists. This guidance would prevent licensed psychologists in Virginia from performing conversion therapy with a patient under 18 years of age, regardless of the willingness of a parent or guardian to authorize such efforts. The guidance will curb harmful practices known to produce lifelong damage to those who are subjected to them and help ensure the health and safety of LGBTQ youth. We thank you for proposing this important guidance.

Sincerely,

Equality Virginia

[info@equalityvirginia.org](mailto:info@equalityvirginia.org)

804-643-4816

[Equalityvirginia.org](http://equalityvirginia.org)

[1] 2011 CDC, "Sexual Identity, Sex of Sexual Contacts, and Health-Risk Behaviors Among Students in Grades 9-12."

[2] Arnold H. Grossman & Anthony R. D'Augelli, "Transgender Youth and Life-Threatening Behaviors," 37(5) *Suicide Life Threat Behav.* 527 (2007).

[3] Caitlyn Ryan et al., "Family Rejection as a Predictor of Negative Health Outcomes in White and Latino Lesbian, Gay, and Bisexual Young Adults," 123 *Pediatrics* 346 (2009).

**Commenter:** Rhonda Thissen, National Alliance on Mental Illness (NAMI) of Virginia

3/18/19 4:36 pm

### **NAMI Virginia Urges a Ban on Conversion Therapy in Virginia Psychology Practice**

To Whom It May Concern:

On behalf of the Virginia state organization of the National Alliance on Mental Illness, also known as NAMI Virginia, I write in support of Guidance Document 125-9, which would protect youth under the age of 18 from so-called "conversion therapy" in Virginia psychological practice. NAMI is a national, state and local alliance with a mission of improving the lives of individuals and families affected by mental illness through education, support and advocacy. As a movement, we reject the practice of conversion therapy on individuals of any age, but in particular on children and youth under age 18.

***There is no credible evidence that any type of psychotherapy can change a person's sexual orientation or gender identity.*** In fact, conversion therapy poses critical health risks to lesbian, gay, bisexual, transgender, and queer young people, including depression, shame, decreased self-esteem, social withdrawal, substance abuse, risky behavior, and even suicide. Along with NAMI and our fellow advocates at Mental Health America, nearly all the nation's leading mental health associations, including the American Psychiatric Association, the American Psychological Association, the American Counseling Association, the National Association of Social Workers, and the American Academy of Pediatrics, and the American Association for Marriage and Family Therapy have examined conversion therapy and issued cautionary position statements on these practices.

Virginia law already prohibits discredited and unsafe practices by licensed therapists. This guidance would prevent licensed mental health providers in Virginia from performing conversion therapy with a patient under 18 years of age, regardless of the willingness of a parent or guardian to authorize such efforts. The guidance will curb harmful practices known to produce lifelong damage to those who are subjected to them and help ensure the health and safety of LGBTQ youth. We thank you for proposing this important guidance.

We strongly urge the adoption of this guidance for licensed psychologists in Virginia.

Sincerely,

Rhonda Thissen, MSW

Executive Director

NAMI Virginia

**Commenter:** Teresa Carver

3/18/19 10:08 pm

### **DO NOT Silence Faith-Based Counselors**

**Do not punish licensed counselors for helping patients overcome their unwanted sexual feelings by affirming biological realities concerning male and female. .counselors should**

NEVER be ALLOWED to help a minor client to explore and facilitate same-sex feelings, attractions and behaviors, or even to "change" their sex all together.

God does tell us of these days coming. Read your Bible, the book of Revelations - - it was foretold of these days and what will happen! Prepare your soul!

**Commenter:** Ernestine Scott

3/18/19 10:08 pm

### **Conversion Therapy**

i am a Christian and also a RN. I do not believe we should teach our children that there is anything other than male and female. Biology proves gender even if outer body is changed. I think counselors should be able to counsel as such. I do not think counselors should be told how to counsel.

**Commenter:** Raymond E Grant

3/18/19 10:12 pm

### **Banning any counseling on unwanted same-sex attraction is unconstitutional**

To deny a counsellee the information that unwanted same sex attraction can be overcome is forcing a viewpoint that is harmful - the objective of counseling should be to give alternatives and provide support to the counsellee's decision. Denying the counselor's right to speak freely of all the alternatives is inherently unconstitutional.

**Commenter:** Richard W Firth

3/18/19 10:22 pm

### **ALLOW COUNSELING OF HOMOSEXUALS**

This is a spiritual issue, not a secular one and must treat it as such with grave consequences for not treating it as such. God hates this sin of ABOMINATION because of the 57 serious and deadly health issues it can cause when practiced. God wiped out the whole cities of Sodom and Gemorrah because the people failed to repent of it and He is currently ravaging over a third of the U. S. with Noah type flooding, catastrophic tornadoes, droughts, wild fires and it will continue until we repent.

Therefore for the protection of everyone in this state from God's continuing wrath please do not stop any attempt to get these individuals to repent

**Commenter:** Brian Prindle

3/18/19 10:28 pm

### **Telling counselors what they are not allowed to talk about is a violation of free speech.**

Counselors can have very different understandings of what is helpful to their patients based upon their extensive experience and education. To limit what they can talk about because the State of Virginia takes a position on dealing with personal issues is an attempt to "close" the issue in the eyes of the state. When it comes to very personal issues, there is no way anyone should try and define with strict language the total understanding of the issue. This amounts to a violation of a person's freedom of speech. We don't have to agree, but we do need to respect the qualifications of those who see certain issues quite differently. This is especially the case when one political party seeks to "enforce" their world view on another, and creates a very dangerous precedent for further "state endorsement" of the only right understanding on issues involved in a person's life.

**Commenter:** S Dorham

3/18/19 10:31 pm

### **Maintain Client/Clinician privilege**

Client/Clinician privilege means conversations and treatment plans within therapy sessions are confidential. What is discussed between client and therapist is no business of any legislator, and it is certainly no place to impose legislation.

Down with micromanagement! Up with trusting licensed professionals to do their jobs without governmental oversight!

**Commenter:** William Mohlenhoff

3/18/19 10:31 pm

### **Comment on Guidance Documents**

The guidance document appears to be incomplete as it does not allow counselors and psychologists to help those who are struggling with same sex attraction or gender confusion. I strongly oppose the passage of this document as it will cause more harm to individuals who want help with same sex attraction and gender confusion but the counselor or psychologist is prevented from actually helping them. Individuals seeking help to turn away from same sex attraction or those seeking to live as their birth gender need love and support, not to be told by a counselor or psychologist that they cannot be helped.

**Commenter:** Sarah Lam

3/18/19 10:33 pm

### **Accept biological reality**

Acceptance of their biological reality should be every person's right, and counselors should be free to help anyone who asks for it. To try to prevent this is criminal.

**Commenter:** Cordell Burch

3/18/19 10:34 pm

### **First Amendment at Risk**

As you know, the First Amendment enshrines freedom of religion and freedom of speech in the U. S. Constitution. The proposed regulation violates both. It allows only affirmation of a person's gender confusion, not correction. Clearly this is a violation of freedom of religion as no Christian counselor could conform to this restriction. And it is a violation of freedom of speech since to state the obvious, that males are males and females are females, is not permitted. Please withdraw this extreme regulation. Thank you.

**Commenter:** Private Citizen with Graduate Degree in Counseling

3/18/19 10:34 pm

### **Guidelines for Counselors Regarding Gender Issues**

Please do not establish any guidelines that will restrict any trained mental health professional from counseling clients dealing with gender issues. Counselors need to be completely free to ascertain the underlying cause of gender issues. This can range from biological factors, environmental issues of child rearing or the influence of behaviors of others that have left an impact, or simply confusion brought about by the media and/or debate of the issue itself. Counselors should be able

to guide a person in whatever way is deemed appropriate in each individual situation once the underlying factor is determined. To deny a counselor the right to treat a counselor the way they determine best for that individual is malpractice. If counseled do not feel comfortable that they are getting proper treatment, they can change counselors. Faith-based counselors are not the enemy. They have a perspective that can help a lot of struggling. Professional faith based counselors operate from a position of great care and respect of the person, regardless of their issue. Do not make the grave mistake of limiting their abilities to help those with gender based issues.

**Commenter:** Mike Neely

3/18/19 10:36 pm

**Please respect faith based counseling**

Please respect the role of faith in our country. Faith is a sacred and fundamental right to every citizen in this country and when our nation takes any actions to compartmentalizations our faith it is an infringement on our Rights.

**Commenter:** Joseph Ellena

3/18/19 10:39 pm

**Free Speech, Freedom of Association: Counselors Should be Able to Offer Patients What they Seek**

Do not try to punish counselors for helping patients overcome their UNWANTED sexual feelings.

**Commenter:** Marilyn Shreckhise

3/18/19 10:44 pm

**Penalizing counselors for discussing issues is wrong**

I am not a counselor, but have an understanding of what is supposed to be happening when folks go to counseling. It seems it would be counterproductive to the purpose of talk therapy if a counselor is going to be penalized for talking to their clients about their issues and all the possibilities for healing. Seems like if a child feels confused about who they are, all efforts should be made to help them clarify the issues. If a person is uncomfortable in their skin, why can't they have honest help trying to reach answers? Holding the counselor's feet to the fire because they are trying to help is not the right way to go about this. Drop the Progressive Agenda and allow people to do their work without all the regulations.

**Commenter:** Karen Dawkins

3/18/19 10:44 pm

**Do not punish counselors for helping patients who wish to overcome unwanted sexual feelings**

Counselors should be allowed to do their jobs of helping patients in whatever way the patient wants and needs to be helped. If a patient wants to overcome unwanted sexual feelings, the counselor should not be punished for helping a patient as they desire. And, if a patient has a feeling that they should be the opposite sex of what their genetics has already determined for them, they need to know the biological facts of the sex and the unhealthy and permanent changes that will occur if they still wish to become transgender. Patients need to know all the facts and not be steered into an unhealthy lifestyle.

3/18/19 10:52 pm

**Commenter:** Glyn Roberts

**Do not punish counselors for helping patients who wish to overcome unwanted sexual feelings**

This is dumb. The victim of any such rule is the patient.

**Commenter:** Mary Mann

3/18/19 10:53 pm

**They are LICENSED counselors!**

**Do not punish licensed counselors for helping patients overcome their unwanted sexual feelings by affirming biological realities concerning male and female.**

**Commenter:** Mary Mack

3/18/19 10:56 pm

**Government should not get involved in private counseling**

Government banning any type of counseling is dangerous overreach into individual freedom. The government is not and should not be an authority over what advice is right or wrong, helpful or not helpful. Individuals should have the freedom to choose the counseling that they believe is best for them without government interference.

**Commenter:** Liane Ridley

3/18/19 11:05 pm

**Patient client confidentiality**

**You must not punish licensed counselors for helping patients overcome their unwanted sexual feelings by affirming biological realities concerning male and female.**

Counselors should be allowed to counsel a client who expresses the desire to overcome feelings that are unwanted especially that go against what many believe are wrong based on the Bible. No Christian counselor could go along with the ideas acceptable today. A counselor should not have their license removed as this is against their constitutional rights. I believe there is such extreme gender confusion today because it is being pushed everywhere starting at a young age even in the schools.

**Commenter:** Elaine Hanger

3/18/19 11:08 pm

**Counseling**

Can you step back and see how fast this freight train is plowing over millenia of recognized norms? Please don't write law according to what is in vogue. This is a very serious issue and one that needs to be left to licensed professional counselors.

**Commenter:** Marilyn McCarty

3/18/19 11:15 pm

**Punishing licensed counselors**

Please don't punish licensed counsellors who are asked by patients to help them overcome unwanted sexual feelings. They only want to do what they trained to do....help people. They should not be prevented from doing this.

**Commenter:** Hadassah H Carter

3/18/19 11:32 pm

**This message is to the Virginia Board.**

**This message is to the VA Board of Counseling. Do not punish licensed counselors for helping patients overcome their unwanted sexual feelings by affirming biological realities concerning male and female. This is un-Constitutional!**

Hadassah Carter

**Commenter:** LaVerne Waybright, consumer

3/18/19 11:36 pm

**Do not stifle licensed professionals' free speech rights**

to stifle licensed professionals' free speech rights

**Commenter:** FRANK CARTER

3/18/19 11:38 pm

**Message to the Virginia Board.**

**Attention: VA Board of Counseling DO NO punish licensed counselors for helping patients overcome their unwanted sexual feelings by affirming biological realities concerning male and female. THAT IS UNCONSTITUTIONAL! STOP IN JESUS' NAME!**

**Commenter:** Katherine Sodergren

3/18/19 11:52 pm

**Speech should not be prohibited or censored by law. Individuals should be feel to hear what is said**

**Commenter:** Doug Craig

3/19/19 12:08 am

**Not enough study has been done to warrant such "suggestions" or censoring of professionals. Where is**

**Commenter:** Judy Cook

3/19/19 1:36 am

**Counseling**

There needs to be much more medical and scientific study before such extreme measures are taken.

**Commenter:** Dennis Webster

3/19/19 3:29 am

**New guidance document on conversion therapy.**

This New Guidance is nothing short of an end run around the United States Constitution. Such a policy or law would be a gross infringement on the rights of the people to seek the medical help of their choice and it will also be an unbearable infringement of their right to privacy.

**Commenter:** Kristen Hinton

3/19/19 3:35 am

**Please don't prohibit freedom**

I understand you are trying to protect freedom, but you are restricting the freedom of the counselor to assist the patient in what way the patient desires. They can assist them to change genders but they can't assist them if they are wanting to stay the same gender and just need help through some growing pains. Please don't infringe upon the freedom of the counselor or the patient by making this law. We need freedom, this is what America is all about.

**Commenter:** Willard Rockwell

3/19/19 6:08 am

**Homosexual pedophile conversion therapy**

As we know all homosexuals are pedophiles, as their behavior is never contained, but always gravitates into deeper perversion and sociopathic actions toward society, it presents a constant threat to law and order and all society and a heightened threat to families and especially children. Families are the main building block of all civilized society and no society exists without them. Therefore the act of sodomy is rape and violence as it damages the body in the anus whose function is to excrete waste not ingest it. We intend to reinstate all sodomy laws on a judicial equivalence with murder as a similar sociopathic act. Conversion therapy is as essential as criminal rehabilitation to prevent future crimes against others. We support it as a good first step protecting our society.

**Commenter:** Sharon Landrum

3/19/19 6:36 am

**Do not restrict freedom**

As Americans, the First Amendment guarantees freedom of religion and freedom of speech in the U. S. Constitution. Conversion therapy denies both. It allows only affirmation of a person's gender confusion, not a correction. DNA proves one's biological sex, and conversion therapy denies science. Please do not punish licensed counselors or deprive patients of the right to direct the counseling they seek or need.

3/19/19 6:46 am



**Commenter:** Robert Arbaugh

**Government over reach**

No government should be involved in any capacity with private counseling of individuals period

**Commenter:** Sybil Lowe

3/19/19 6:47 am

**Do not restrict freedom**

Do not restrict the freedom of faith based counselors to their patients who are seeking help of their choosing!

**Commenter:** Gordon Goetz

3/19/19 6:57 am

**Biological Affirmation Counseling**

Do not to punish licensed counselors for helping patients overcome their unwanted sexual feelings by affirming biological realities concerning male and female. This is tantamount to censorship and will stifle licensed professionals' free speech rights, with the direct consequence of denying patients their basic right to direct the objectives of the counseling they seek. This action would be wrong, dangerous, and unconstitutional.

**Commenter:** Eileen Bakke

3/19/19 6:59 am

**New Guidance for Counselors**

Please do not restrict the Constitutional rights of faith-based counselors to serve their clients who are freely seeking help with with sexual attraction or gender identity issues.

**Commenter:** Dixon D Handwerk

3/19/19 7:17 am

**New Guidance Document on Conversion Therapy**

Counselors are trained professionals and they need to have the freedom to exercise the best help for people that are troubled with gender confusion. The problem has become much worse since it is now "trendy" and the poor young people are being duped into a destructive lifestyle. Misery loves company.

**Commenter:** Mark Calabrese

3/19/19 7:24 am

**Stop trying to punish counselors and violate their free speech rights!**

Stop trying to punish counselors and violate their free speech rights through draft administrative regulations that would prohibit counselors from helping someone overcome unwanted same-sex attractions or gender dysphoria! Counselors should be free to help provide their patients the fundamental right to direct the objectives of the counseling they seek.

**Commenter:** Brian from Glen Allen

3/19/19 7:28 am

**Proposed Regulations to Punish and Silence Faith-Based Counselors**

**Do Not begin punishing licensed counselors for helping patients overcome their *unwanted* sexual feelings by affirming biological *realities* concerning male and female.**

This regulation stifles licensed professionals' free speech rights, with the direct consequence of denying patients their basic right to direct the objectives of the counseling they seek. It also sets up an obvious double-standard.

This regulation is clearly wrong, dangerous, and unconstitutional, but ideologically-driven.

**Commenter:** Cynthia C. Lowe

3/19/19 7:30 am

**Punishing Counselors**

As a health care worker for over 40 years, there is great danger in this bill. Counselors should be able to present the facts to their patients as they seek treatment for overcoming their unwanted sexual feelings. Where is free speech and isn't this bill unconstitutional? This would be a death sentence to counselors and their patients.

**Commenter:** Ruth E Edens

3/19/19 7:36 am

**Psychology Board Restricting Licensed Counselors**

The proposed regulations are based on the thought that assisting a minor with overcoming feelings of sexual identity or preference that conflict with clear biological reality "might" cause harm. Not overcoming those dysphoric feelings does cause harm. The CDC has plenty of research that shows the physical and mental harm that is caused by living in other than the biological identity one possesses. Please protect the physical and mental health of these children and do not unlawfully repress the ability of counselors to help them.

**Commenter:** Therese Zepeda

3/19/19 7:48 am

**Respect free speech and the right of patients to seek the help they desire.**

I am writing to urge you to maintain the free-speech rights of counselors and patients , including patients who seek and counselors who provide help and guidance in dealing with unwanted sexual desires, feelings, etc

**Commenter:** Mike Wolfe

3/19/19 7:48 am

**Do Not pass guidance documents and regulations to stifle licensed professionals' free speech rights**

**I urge you to not punish licensed counselors for helping patients overcome their unwanted sexual feelings by affirming biological realities concerning male and female. Thank you.**

**Commenter:** Matthew Parowski

3/19/19 7:51 am

**Biology matters as much as perception of biology - especially within faith traditions**

The effort of this guidance document to prohibit counselors from affirming biological reality over a patient's perception of their body and their desires runs counter to my Christian faith, which affirms that God made humankind male and female. Nearly all people (very unusual circumstances excepted) have a clearly identifiable biological sex, and affirming that sex while working through desires that may, to varying degrees, run counter to that sex is a faith-based approach to integrating one's passions with one's body. Prohibiting this approach is oppressive to religious faith.

**Commenter:** Dennis Smith

3/19/19 8:00 am

**Please do not punish counselors who help patience overcome unwanted sexual feelings**

Everyone knows emotions are weird things. You may feel one way about a food or television show one moment, and later completely change your mind about it. There have been many people that I thought that I was in love with, only to find out that it was the result of other things going on at the time, fatigue, excitement, the pressuring of friends, all these and more can affect our feelings towards other members of the opposite sex and even the same sex. When someone goes to a counselor to discuss things going on in their lives, they are looking for someone to help them become the person they want to be. If they want to pursue a relationship or if they don't want to pursue certain relationships. Perhaps past relationships make them cautious, or perhaps their own beliefs and morality suggest that they would not be wise to seek a relationship with a person who drinks alcohol, or is not good with their finances. Is it not their right as the consumer to seek help for the feelings that they do not want? Regardless of sex, race or other factors. You do not have to agree with them, and the counselor does not have to counsel with them. Is the goal here to make us all the same and not allow for any disagreement at all? Is not the goal here for the Muslim, the Homosexual, the Jew, Christians and others to coexist? Or is it that we all have to agree with popular opinion or be put down? I ask that counselors be able to counsel those who come to them with the counsel they are asking for. So that each person can become the person he or she wants to be.

**Commenter:** Kimberly McDaniel

3/19/19 8:13 am

**Do not take away free speech for licensed counselors!**

**DO NOT PUNISH take away free speech of licensed counselors for helping patients overcome their unwanted sexual feelings by affirming biological realities concerning male and female.**

**Commenter:** Steve Aiello

3/19/19 8:16 am

**Do not restrict a patient's request for unwanted same sex attraction**

It is an infringement of a person's civil rights to make counseling for unwanted same sex attraction unlawful. It is not the government's responsibility to decide on questions like this. These are mental health issues and should be explored by the individual involved and his or her family.

**Commenter:** Nancy S Pendergrass, MPH, RDN

3/19/19 8:29 am

**Do not punish licensed counselors**

Please do not punish licensed counselors for helping patients overcome their unwanted sexual feelings by affirming biological realities concerning male and female..

**Commenter:** Eric Hammond

3/19/19 8:32 am

**Do not punish those seeking help and those providing help**

It is absolutely ridiculous to punish a licensed counselor for helping a patient overcome their unwanted sexual feelings by affirming biological realities concerning male and female. Hiding reality behind truth does nothing to help a patient but rather is more harmful and cruel to their recovery process.

**Commenter:** Laura J Sentiger

3/19/19 8:33 am

**Unconstitutional to restrict counselors from providing WANTED services by patients**

I oppose the VA Board of Counseling for trying to punish licensed counselors for helping patients overcome their **unwanted** sexual feelings by affirming biological realities concerning male and female. If this is the patients desire, then those health professionals working to help them should not be penalized or silenced. All options should be available to patients, and restricting one side is unconstitutional. This should NOT be a political issue, but what is best for patients and their counselors

**Commenter:** Vicki in Henrico

3/19/19 8:37 am

**Do Take Away the Freedom of Counselors and Their Clients**

This is still America: home of the free, land of the brave. Do not make it into a Communist country or a banana republic where the government mandates what personal choices its citizens can make. Give counselors and their clients the opportunities to choose to be all they can be.

**Commenter:** Tyna Gaylor

3/19/19 8:38 am

**Freedom of thought and expression**

Counselors need to be allowed freedom to think, to hear, to interpret and discuss all manner and breadth of the issues presented to them by a patient. It is important to see individuals, rather than interest groups when providing mental health services. I encourage the board to provide for full and open therapy for those confused by gender, offering a full range of solutions to a person's emotional pain. Additionally, over 80% of gender-confused youth resolve their confusion in favor of their genitalia. Disallowing therapies and conversations that fail to recognize facts is a disservice and potentially malpractice. The science is not settled in favor of transgenderism and, until it is, all options need to be available to those with gender dysphoria.

**Commenter:** Eddy Aliff, Virginia Assembly of Independent Baptists

3/19/19 8:40 am

### **Opposition to current guidance documents on counseling same-sex attraction**

I urge rejection of the current guidance documents preventing licensed counselors from helping those with same-sex attractions to overcome such feelings. Having a bachelors degree from the University of Richmond in biology, it would seem this area should have a major bearing on this area. Feelings can change for so many reasons and it should not be the basis for allowing a child to continue believing this is his/her destiny for life. The process of maturing through adolescents is challenging enough. Please do not prevent a counselor from providing direction to help those children better understand being a male or female in conjunction with their biology. Let this not be the same debacle undertaken in the past century of sterilizing those considered unfit due to mental deficiency. This is a very subjective field of study and limiting certain types of counseling will be damaging to future generations.

Therefore, on behalf of the Virginia Assembly of Independent Baptists, I urge rejection of these guidance documents related to what has been incorrectly labeled "conversion therapy".

**Commenter:** John Weinreich

3/19/19 8:42 am

### **Councillors need to be free to council**

It is an infringement of a person's civil rights to make counseling for unwanted same sex attraction a punishment to the councillor. It is not the government 's responsibility to decide on questions like this. These are mental health issues and should be explored by the individual involved with his or her family and licensed professionals.

**Commenter:** Roberta Gibson

3/19/19 8:43 am

### **Please do not prohibit counselors from helping patients overcome unwanted sexual feelings.**

Please do not legislate the right of patients to direct the object of their therapy. Government has no right to interfere in the patient/ counselor relationship just because a theory is currently in vogue. Human beings are made as male and female. Every cell in their bodies proclames this fact.To interfere lagainst nature makes no sense and is cruel. Biological facts are facts. Feelings are transient and are not facts.

**Commenter:** Shana Daniel

3/19/19 8:54 am

### **Proposed Regulations to Punish and Silence Faith-Based Counselors**

You are wrong to think that the public wants this bill and that the government should in any way be involved between counselors and individuals. There is a difference between the emotions and thoughts of a child and the emotions and thoughts of an adult. An adult can make a decision and suffer those consequences, but the courts have shown that there is a difference bewteen an adult and a child when it comes to committing crimes, and I would put forward that these are not the only differences. To allow children to follow wherverver their immature minds would take them is foolish and irresponsible and NOT in the child's best interest or this country's not to mention it goes against our own constitution

."As with other kinds of speech, regulating the content of professionals' speech 'pose[s] the inherent risk that the Government seeks not to advance a legitimate regulatory goal, but to suppress unpopular ideas or information."

**Commenter:** Pete Lepine, private citizen

3/19/19 9:00 am

**Attempted censorshio by theLeft**

Let counselors do their jobs! Stop attacking Americans who sill believe in traditional values-the values that made us the strongest nation on Earth!

**Commenter:** Patricia Magyar

3/19/19 9:08 am

**NO censorship: administrative regulations!!!**

**Please not to punish licensed counselors for helping patients overcome their unwanted sexual feelings by affirming biological realities concerning male and female!!!**

**Commenter:** Stephen Hertz

3/19/19 9:17 am

**Reject these guidelines which enforce bias**

ThanksThe Boards "guidance" to counselors is clear and simple: If you hold to the natural, biological, historical and/or Biblical understanding of human sexuality, be prepared to lose your professional license.This is nothing but censorship. I strongly object. Thanks, Stephen Hertz.

**Commenter:** Dave Wagner

3/19/19 9:19 am

**RESTRICTING PERSPECTIVES IS UNJUST**

All decisions, but especially life-long decisions require a complete understanding of the ramifications that will result from choices we make. Restricting information from patients is unjust and untruthful. Recommend that the board consider the case of Jamie Shupe before restricting patients from the full scope of impacts that these decisions may have on their lives. Sharing all views with a patient does not harm but shows love and provides the patient with a complete perspective upon which they can make a sound decision.

**Commenter:** Jay Judkins

3/19/19 9:28 am

**Counselors Right to Freedom of Conscious**

Please consider carefully how state imposed restrictions on a coueslor might open the door to other avenues of restrictions on other professions. We enjoy tremendous freedom here in the Commonwealth, freedoms that have existed since the Founding Fathers recognized the need to both fight for and codify these rights to protect them for the future of this great state. I quote Congressman Morgan Griffith's most recent newsletter:

"In last week's column, I referred to the Virginia Statute of Religious Freedom that inspired the First Amendment guarantee of religious liberty. The statute's author, Thomas Jefferson, wrote that it

was meant to protect "the Jew and the Gentile, the Christian and Mahometan" (as many people in his time referred to Muslims).

Those protections still stand today, and they should guide not just our legal obligations but our moral conduct toward one another. All who respect the law and their neighbors should be free to live in peace while practicing whatever faith they have."

Many trained professionals operate within the framework of the First Amendment and offer counseling services. Denying the very faith that is guaranteed by the First Amendment by compelling individuals to counsel contrary to that which they hold as both a deep and sincere belief, whether Jew or Gentile, Christian or Muslim, is unconstitutional and unacceptable for all, whether counseling by faith, or no faith at all.

**Commenter:** Scottie Jackson

3/19/19 9:49 am

### **licensed professionals' have free speech rights**

Do not to punish licensed counselors for helping patients overcome their unwanted sexual feelings by affirming biological realities concerning male and female.

I believe the state Boards of Counseling, Psychology, and Social Work adopting Guidance Documents and full-scale regulations stifles licensed professionals' free speech rights, with the direct consequence of denying patients their basic right to direct the objectives of the counseling they seek.

**Commenter:** Diane Smith, Citizen and Voter

3/19/19 9:53 am

### **Stop the censorship!**

The first amendment says in part, "Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise of, or abridging the freedom of speech..."

This law would force the current non-Biblical point of view regarding gender and sexuality onto everyone, thereby preventing the free exercise of Christian beliefs and the freedom of speech. In effect, it would establish a "religion" of atheism, and impose it on this country.

**Commenter:** Everett Hines

3/19/19 9:54 am

### **Counselors should be able to HELP their patients overcome unwanted sexual feelings or desires.**

Don't punish counselors who help their patients with unwanted sexual feelings or desires! It is wrong, dangerous, and unconstitutional to take away a counselors' right to free speech. Counselors who hold to the natural, biological, historical and/or Biblical understanding of human sexuality, should not lose their professional licenses. If a patient WANTS conversion therapy they should be able to get it. Why should counselors ONLY be able to affirm LBGTQIA issues and not ALSO be able to deny them depending on the needs of their patient?

**Commenter:** Jeff

3/19/19 9:55 am

### **Give Counseling Clients a Choice**

Excerpted from a counseling organization's statement:

[This organization] promotes self-determination, individual liberty, and the right to respond to one's own moral conscience; these are the hallmarks and fundamentals of our modern democratic societies. [This organization] has advocated self-determination as a primary value in all of our policies. We are focused on the right of persons to deal with unwanted sexual behavior and attractions as well as the right of therapists to offer psychological care to those who wish to deal with these concerns by managing, diminishing or eliminating them rather than just identifying with and acting upon them. We acknowledge and respect the right of individuals to claim a gay identity. People have various personal, interpersonal, health, religious, and other reasons for wanting to pursue change in their unwanted same-sex attractions and behaviors. They have every right to have their values respected.

**Commenter:** Heritage Carnell

3/19/19 10:00 am

### **A suspicious double standard**

The Board appears to be saying that "gender dysphoria" goes only one way -- FROM actual biological reality, TO the current fad for 'trans.' Patients who seek counseling need to have the right to choose the path they want to pursue! Muzzling counselors is not only unfair to their patients, but also is an unconstitutional violation of the 1st amendment. Virginia's government should not and must not determine what kind of counseling an individual is allowed to seek.

**Commenter:** Jacqueline M Cunningham

3/19/19 10:01 am

### **Trained Councilors Freedom to Council**

Part of Freedom is the ability to seek help dealing with our emotional and life issues with trained professional councilors. Why would we limit a councilor in counciling a person who is seeking help? I ask the freedom in one's job to do that which they have been trained to do be HONORED in this state. Do not limit or make illegal the ability of a trained professional to give guidance and council to a patient requesting help to figure out gender issues or anything else they seek aid in please.

**Commenter:** John Basham

3/19/19 10:08 am

### **Free to counsel**

Let cdo there job and keep your nose out of it.ounselors

**Commenter:** GLSEN Richmond Policy Coordinator

3/19/19 10:24 am

### **Regulation of Conversion Therapy by licensed professionals**

GLSEN Richmond is pleased to support Guidance Document 125-9, on the Practice of Conversion Therapy, which would protect youth under the age of 18 from so-called "conversion therapy" at the hands of licensed psychologists in Virginia. GLSEN is the leading organization in the US working for safe schools - particularly LGBTQ+ youth.

Conversion therapy, sometimes referred to as "reparative therapy," "ex-gay therapy," or "sexual orientation change efforts," is a set of practices by mental health providers that seek to change an individual's sexual orientation or gender identity. This includes efforts



to change behaviors or to eliminate or reduce sexual or romantic attractions or feelings toward individuals of the same sex. Conversion therapy does not include psychotherapy that aims to provide acceptance, support, and understanding of clients or the facilitation of clients' coping, social support, and identity exploration and development, including sexual orientation-neutral interventions to prevent or address unlawful conduct or unsafe sexual practices. Nor does it include counseling for a person seeking to transition from one gender to another.

There is no credible evidence that any type of psychotherapy can change a person's sexual orientation or gender identity. In fact, conversion therapy poses critical health risks to lesbian, gay, bisexual, transgender, and queer young people, including depression, shame, decreased self-esteem, social withdrawal, substance abuse, risky behavior, and even suicide. Nearly all the nation's leading mental health associations, including the American Psychiatric Association, the American Psychological Association, the American Counseling Association, the National Association of Social Workers, and the American Academy of Pediatrics, and the American Association for Marriage and Family Therapy have examined conversion therapy and oppose it

**Commenter:** Michael Jeffrey

3/19/19 10:29 am

### **Speech is prohibited by law if harmful**

Speech is prohibited by law. You cannot yell "Fire" in a crowded movie theater. Speech, if harmful, like conversion therapy, can be prohibited. This is not a issue of free speech, it is part of our oath to "do no harm." There are enough "counselors" who are not licensed causing harm in Virginia, the Board should do nothing to support those who are licensed from also doing harm.

**Commenter:** Richard E. Cooley

3/19/19 10:33 am

### **Free speech**

Please do not remove free speech from counselors.

**Commenter:** Tony Monaghan

3/19/19 10:34 am

### **In the beginning**

"So God created man in His own image; in the image of God He created him; male and female He created them." That quote is from Genesis 1 verse 27, and is central to the basic anthropology of a Christian (and Jewish, and Islamic) worldview. Western civilization was built on a Christian view of the nature of God and the nature of man. Yet the left in this country is hell-bent on overthrowing the expression of Biblical religion.

The expression of religion is not in worship alone - it is in all of life. The first amendment to the constitution of the United States is not freedom of worship, it is freedom of religion. It is the freedom of the expression of the gospel of the Lord Jesus Christ in all of life. When a government overthrows that liberty it stands not only against Christians (and Jews, and Muslims) but against God. I urge you to read the accounts of God's judgment on nations that stand against God. There are many, start with the book of Amos.

The proposed rule change is the governmental establishment of religion - the establishment of a false view of the nature of man, a false view of the nature of God. Please do not call evil good and good evil; please do not bring judgement on this state and this country by evil actions. God is not mocked.

**Commenter:** Donna Lauderdale

3/19/19 10:39 am

**Guidance Document**

Dear Virginia Board of Counseling

I have read your draft Guidance Document on "conversion therapy." I am appalled that it is so clearly designed to ignore biology of the human race and advocate for genderless society. Is that really what we want?

Our genetics is clearly male and female when it occurs normally. When all the chromosomes occur without defect, a normal, healthy and heterosexual human is born. Without heterosexuality, humanity would cease to exist.

When there are errors in chromosome makeup, there are problems. Many errors result in health issues, frequently undiagnosed until they become a serious problem. I am one of those people who has a genetic defect that does not force my body to excrete toxins quickly, but rather stores them, causing an endless stream of negative symptoms and illnesses. I have sought treatments to help overcome the results of this defect.

When the sex determining genetics has an error, the result is a human with abnormal feelings about themselves and other human beings. This defect is no different from mine or any other. It creates problems for the human being and we should strive to correct the problems or the cause of the problem through treatment, whether physical or psychological.

Your draft document as written denies people who do not want to have aberrant sexual feeling or act on those feeling, the opportunity to receive treatment. Currently, to my knowledge, we do not have a way to correct errors in the sex-determining genes, but we do have psychological treatment and counseling methods that can help a person live with their problem in a healthier way.

Why should it be that those who want to transform themselves to another gender should have that opportunity and be encouraged to do so, but those who do not want to transform themselves should be denied the opportunity to make their lives better?

There is a lot of lip service given to justice and equality today, but your draft document clearly does not offer either. Many of the counselors who help those who do not want to transgender are faith based. In addition, Constitutionally, expression of faith must not be denied in the counseling room as it must not be denied in the public square or in the media.

Please do not adopt this document and do not disallow any of the currently available counseling for people with gender problems. People should be allowed to seek the kind of counseling that best serves their psychological and physical needs.

Regards,

Donna Lauderdale

Manassas, Virginia

**Commenter:** Werner Lind

3/19/19 10:44 am

**Oppose censorship of licensed counselors**

The proposed regulations are an ill-advised state interference with the professional speech of licensed counselors making informed judgments about the therapy their clients need, and an interference with the rights of the clients to seek this treatment. Moreover, they are based on junk science, used in an attempt to politicize counseling in the service of an extremist agenda. They

would certainly be challenged in court, since (based on numerous Supreme Court precedents) they are clearly unconstitutional.

**Commenter:** Joel Sutton

3/19/19 10:45 am

### **Do the right thing**

I know that your agency is seeking the best for Virginians. There can be narrow opinions on both sides of this dialogue. Please do not go with the extremes. A citizen should have the right to seek the type of treatment they desire, even if it includes the option of turning away from a transgender identity and seeking an alternative that is based on their faith views. And a counselor should have the right to present alternatives that represent their own faith views, and allow the client to make that choice. To limit these rights is absolutely unconstitutional. It would be a limitation of free speech, free choice, and freedom of religion. As a citizen of Virginia and the United States, I fully expect this agency to uphold those constitutional rights.

**Commenter:** Janson J. Harrill,D.C.

3/19/19 10:55 am

**Don't censure faith-based counselors. Suicide rates among CT people are much higher than normal.**

**Commenter:** Katharine Shaibani

3/19/19 11:01 am

### **attempt to ban conversion therapy**

I strongly oppose Virginia's new effort to limit the free-speech rights of counselors through regulation. If a minor client is experiencing *unwanted* same-sex attractions, it is unethical to deny that child the help he or she wishes to obtain. There are many, many documented examples of successful therapy in these cases, and such care can be provided with sensitivity and kindness. Further, it is anti-science to deny biological gender, and it is unconstitutional to prohibit a counselor from voicing the advice he or she believes would best help the client. The regulations as proposed appear to me to amount to compelled speech—the government forcing counselors to voice only the government's point of view.

**Commenter:** Edna Gorman Independent Voter

3/19/19 11:07 am

### **Allow both views about sexual orientation**

As a former Probation & Parole Counselor, I have seen many people struggling with their identities. However, all situations cannot be addressed with individuals unless both sides are presented to them. I have seen clients who have been influenced by their peers to be & do certain things that they did not want to feel or do because of friends, gangs & street pressures. Therefore please let counselors be counselors & do not restrict them from getting their clients out of life changing decisions which in all actuality they physically or mentally are not suited for or a lifestyle that they may not truly want. Let them make that decision. Only they can do it with your help, if it is the right course of action for them. One of my clients once said to me, "you do not understand, I do not know how to get out of this situation". Please help everyone the way you should. Your counseling should only help not hurt the ones you profess to care about.

**Commenter:** Larry Weaver

3/19/19 11:21 am

**Allow counselors to help ALL struggling with sexual matters**

Counselors are ALLOWED to help a minor client to explore and facilitate same-sex feelings, attractions and behaviors, or even to "change" their sex altogether, but they are strictly PROHIBITED from helping a minor client struggling with unwanted same-sex attractions from developing a natural and Biblical sexual ethic, or aiding a child dealing with gender dysphoria in learning to embrace his or her biological status as either male or female. So, children can change in one direction, but not the other.

**Commenter:** Lana Schexnader, M.E.V.

3/19/19 11:39 am

**Oppose guidelines preventing CHOICE in services WANTED by patients**

Licensed counselors should not be punished for or prevented from helping their patients overcome unwanted sexual feelings or for exploring the root causes of their gender dysphoria and affirming biological realities of the DNA occurring in every cell in our bodies.

The powers that be claim to respect choice as the foremost freedom in our society and claim they do not want government control of health decisions; yet, where are these people to protect the freedom of those who do not want same sex attraction or do not want to transition to a gender that is opposed to biology and nature?

LGBT people have the highest rate of suicidal thoughts and attempts of any segment of our society. They have complete societal approval of their lifestyle choices and still they are very unhappy. Could it be that what they really need is a counsellor who helps them to explore the underlying reasons as to why they think this way rather than one who unquestioningly prescribes dangerous hormones?

Read the testimony of those who have transitioned and then gone back to their biological gender and they will tell you that the lie did not make them any happier or healthier. Read the testimony of those who have discovered that homosexuality did not make them any happier or healthier and it was only after they turned to a heterosexual orientation that they felt happy for the first time.

Please do not rob patients of the option of therapy that will truly help them to break free of a self-destructive lifestyle.

**Commenter:** April Howland

3/19/19 11:41 am

**Object to censoring Counselor**

It is our Constitutional right to free speech. If I am seeking a faith based counselor it is because I want to hear their perspective and want their guidance in this issue. It is the patients right to seek counseling from whomever they chose and from whatever background they think will help them in this matter. I personally have a sister who came out of the gay lifestyle and is living a more conservative life now. She didn't get there through faith based counseling, but the transition may have made it a bit easier for her. Thank you.

**Commenter:** Audrey Stout, RN, RDMS

3/19/19 11:48 am

**Protect free speech and conscience rights of counselors**

Do protect and not punish the conscience and free speech rights of counselors in Virginia. No one should be forced to promote practices which violate their conscience, and be able to help anyone who does NOT want same sex attractions and gender dysphoria. Those with gender dysphoria should be provided with counseling which affirms thier biological gender and obtain help when desired to do so without the counselor being punished.

I believe you have misnamed what **should be accurately called "Biological Affirmation Counseling" as Conversion Therapy**. Studies have shown sex change has not produced the desired effects for many, and led to more pain and depression. Numerous physicians involved in early sex change efforts have disavowed it of late.

Again, I urge you to the reject the statements of the Guidance Documents RE: Conversion Therapy, claiming it can harm minors or others, as it wrongly portrays therapy to affirm biology. Please rotect counselors and vulnerable youth.

**Commenter:** Wayne and Diane Rautio

3/19/19 12:14 pm

**Free speech is still a protected right. If one wants help, he/she is entitled to it.**

Free speech is still a protected right. If one wants help, he/she is entitled to it.

We kick God out of everything then wonder why we have problems. Evil, pure and simple.

**Commenter:** Nicholas Jensen

3/19/19 12:18 pm

**Free Speech for Licensed Counselors**

**Do not punish licensed counselors for helping patients overcome their unwanted sexual feelings by affirming biological realities concerning male and female.**

**Commenter:** Carl Russell

3/19/19 12:24 pm

**What planet are you on??? Why are you against my freedom and my religion?**

This is not the Soviet Union... who are you to limit our freedom to get the counseling we want? You obviously haven't investigated the hundreds or more that have gotten counseling for their same-sex attraction and have experienced freedom and healing.

This governement is over-reaching in this area and needs to remember its place.

**Commenter:** Eric Marx

3/19/19 12:26 pm

**No censorship!**

There should not be any restrictions on what is said in a counseling situation.

**Commenter:** Ashlee R

3/19/19 12:40 pm

**We are People**

End the barbaric conversion therapy in Virginia today.

**Commenter:** Doug Harshbarger

3/19/19 12:41 pm

### **Indoctrination or Counseling?**

The health regulatory boards have labeled the practice of helping someone overcome unwanted same-sex attractions or gender dysphoria as "conversion therapy," when in reality it should more rightly be characterized as "Biological Affirmation Counseling." The Board's definition of "conversion therapy" is extremely obvious that they support double standards. The key to what should guide the counselor is "why is the patient seeking counseling?" Please not that we are talking about "unwanted" feelings. What is so hard to understand? Someone who is seeking help with something they want to overcome should be helped. Please stop this "gag order!"

**Commenter:** Damien Wright

3/19/19 12:49 pm

### **Why?**

They're children. Leave them alone. Parents do not know what is best.

**Commenter:** Jean Hart

3/19/19 12:59 pm

### **Banning therapy is an unconstitutional violation of free speech**

Banning therapy doesn't make sense when there are people with unwanted same-sex attraction who are seeking out this therapy of their own accord. See personal testimonies:  
<https://www.reintegrativetherapy.com/documentary>

Banning therapy is an unconstitutional violation of free speech.

**Commenter:** Ronald D Ford

3/19/19 1:02 pm

### **legislature to silence counselors**

**I please ask that you not punish licensed counselors for helping patients overcome their unwanted sexual feelings by affirming biological realities concerning male and female.**

**Commenter:** David Jones

3/19/19 1:09 pm

### **Gender Dysphoria is a Confirmed Mental Illness**

Humans cannot change sex. It is biologically impossible. People claiming to be the opposite sex are delusional and need psychiatric help. These people have all sorts of problems including record stds, unstable relations, substance abuse, and suicides. They harm not only themselves, but society. Moral and ethics dictate that they humane help, not enabling and facilitating their fabricated realities that harm not just themselves, but others.

**Commenter:** Scott H

3/19/19 1:11 pm

### **Conversion Therapy does not work**

Plain and simple, conversion therapy is torture and harmful and does not work. Nearly every major association of mental health professionals have released statements condemning the practice. Therapy must be evidence-based and empirically verified in order to be a best practice. Conversion therapy is neither. Practices that are not guided by the client, have outcomes which are imposed upon the client, and don't work are not therapy but torture.

**Commenter:** Edna Gorman Independent Voter

3/19/19 1:11 pm

### **Oounselors banned from**

**Commenter:** Heidi BruMar

3/19/19 1:17 pm

### **Conversion Therapy is Not Healthy**

Conversion therapy is NOT healthy for teens or even adults. No one should be forced into "therapy" that does nothing but shame the recipient, and in some cases, tortures them physically as well.

How can anyone believe that you can change who someone is, who they were born to be, by forcing someone else's beliefs on them? It's very ugly. It makes those who believe in this crock look really bad.

And let me state this for all the "religious freedom" criers out there. Just because we are trying to make it impossible for your "religion" to torture teens does NOT mean your religious freedom is being taken away. You do NOT have the right to torture and shame these people. You do not.

**Commenter:** Eric Wilber

3/19/19 1:27 pm

### **Support proposed guidance**

Put simply, this is common sense guidance that effectively ends the barbaric practice of conversion therapy. This is not a freedom of speech issue: conversion therapy interferes with a child's ability to effectively work through their feelings and societal pressures of their sexual orientation, and most of the time it is forced on them by scared and angry parents who don't understand what they are going through. I fully support this guidance to support and protect our children.

**Commenter:** Jared

3/19/19 1:29 pm

### **The State has no right to limit private counsel**

The Bible has long been proven as the authority on morality. What is right and best for human flourishing. Faith based counsel should not be limited and the state has no right to interfere with private counsel.

**Commenter:** Henry H Riley IV

3/19/19 1:29 pm

### **No scientific basis for Conversions Therapy**

As a gay man who came of age in the 1980's if the fear of isolation, hatred, bullying and self loathing and suicidal thoughts and AIDs did not « convert » me then I do not understand how it is possible that this conversion therapy would change me. How can I change what is innate in me? My sexual orientation was no more my choice than my eye color or my gender. Why is it ok to force people to go to therapy for something they do not believe they need. If this had been done to me it would have reinforced my self loathing which was not necessary as being a gay man is not wrong it is part of who I am. If we allow this to go on we are perpetuating stereotypes and the belief there is something wrong with us. The American Psychiatric Association does not believe being gay or lesbian is illness that needs to be treated. So why do we need this conversion therapy? If we are not ill, what is being fixed?

Sadly this could lead to even more suicides. Which are already at an all time high for young adults.

Instead of conversion therapy the commonwealth should working toward inclusion and protection of all its citizens.

As a gay man I am still not fully protected under the laws of the commonwealth.

I respectfully ask you to eliminate this unnecessary and ineffective form of so called therapy. Therapy is something that someone chooses to do and is not forced on them. It is done to help a person cope with stress, depression or anxiety. It is not done to convert them.

Henry H Riley IV

**Commenter:** Rev. Robin Anderson, Commonwealth Baptist Church

3/19/19 1:30 pm

### **Conversion Therapy Causes Trauma**

As a pastor, I have witnessed up close and personal the severe damage that conversion therapy causes those who experience it. I have counseled numerous LGBTQ individuals who struggle to recover from the trauma of conversion therapy, even decades after they received it. Some have told me stories of attempting suicide due to the pain and shame they were made to feel by well-meaning therapists. I can't adequately express how awful it is to watch faithful adults struggle to believe that they are beloved by God and their church because, in their youth, they were told otherwise and forced to try to deny who they are.

Please ban conversion therapy for minors in the Commonwealth of Virginia. It causes people life-long pain and trauma. It causes crises of faith, which sadly don't always heal. All too often, it's even deadly. We must do better for those who grow up in Virginia and everywhere for that matter.

**Commenter:** Margarita Martinez

3/19/19 1:33 pm

### **Conversion Therapy is extremely harmful.**

Professional organizations like American Psychology Association, American Counseling Association, American Social Workers Association etc have all deemed that conversion therapy is



hamful and is unethical for our licensed practitioners to use. Therefore, if any of our practitioners use these kind of therapies there should be consequences.

**Commenter:** J cohen

3/19/19 1:35 pm

**Outlaw conversion therapy**

Conversion therapy is cruel and inappropriate. Outlaw it in Virginia.

**Commenter:** Shirley Hottot

3/19/19 1:39 pm

**Conversion therapy is harmful!**

Virginia needs to outlaw this harmful practice.

**Commenter:** Joyce Connery

3/19/19 1:39 pm

**Conversion therapy has no basis in science and is damaging**

Conversion therapy is torture. It is designed to use shame, guilt, and so-called aversion therapy to try to convince a child that his or her natural impulses are unnatural or amoral. Worse, by perpetuating the myth that such practices could actually chance a child's sexuality, practitioners are perpetrating fraud on parents and families, who may misguidedly believe that they are acting in their child's best interest. In all cases, these practices are extremely harmful to the child and often lead to depression and even suicide. We need to put an end to conversion therapy in all forms.

**Commenter:** Edna Gorman Independent Voter

3/19/19 1:42 pm

**Counselors banned from talking about AIDS in early 1980's**

When I was a Probation & Parole Counselor in the 1980's & 1990's, I had many clients who were HIV/AIDS positive, many very sick & some dying. However the Virginia Dept. of Corrections banned us from discussing anything with them about their disease, writing it down in their file or Presentence Report, or even acknowledge they were suffering & dying of something that was definitely primary in their lives. We could talk & take notes etc. about those that had cancer, heart problems etc. etc. but not HIV/AIDS. How can anyone counsel their clients with bans on what they can be talked about? I had a young women who had three children under the age of 7 who was dying!! We were to treat her in an nondescript way. How unfortunate!! By the way, she died under my supervision. Counsel's mouths, expertise, & knowledge should not be restricted. All information should be available for the client to decide. We care about them & want them to succeed. That is why we choose this profession.

**Commenter:** Keygan Miller

3/19/19 1:42 pm

**Conversion Therapy is Unacceptable for Licensed Counselors**

To Whom It May Concern,

As an openly transgender person residing in the state of Virginia I am ashamed that conversion therapy is still a practice that Virginia allows licensed professionals to continue using. These harmful practices use rejection, shame, and psychological abuse to force people to try and change who they are. This is known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts.

The American Psychological Association does not even condone the practice of conversion therapy. (For the resolution of the APA on conversion therapy see <https://www.apa.org/about/policy/sexual-orientation>) the APA along with several other mental health organizations agree that conversion therapy does not work at best and at worst causes more mental health issues.

I know the biggest concern with all of this is religious freedom. The good news, religious beliefs and the ability to practice them are not in question here. This has to do with licensed counselors, who are licensed by the state, which is separate from any religious beliefs, not being allowed to practice conversion therapy on vulnerable youth. Keep the church and state separate and regulate the state by regulating the licensed counselors to provide care your LGBTQ youth that has been proven to be best for mental health by eliminating conversion therapy as an option.

Thank you for your consideration,

Keygan Miller

**Commenter:** Lisa Griffin, Ph.D.

3/19/19 1:49 pm

### **Sexual orientation/gender identity change efforts are harmful and unethical**

We've had evidence for over a decade that sexual orientation/gender identity change efforts don't work and can be harmful. For example, in 2009, the American Psychological Association reported: "[A] task force conducted a systematic review of the peer-reviewed journal literature on sexual orientation change efforts and concluded that efforts to change sexual orientation are unlikely to be successful and involve some risk of harm, contrary to the claims of SOCE practitioners and advocates." As a psychologist working with LGBTQ+ youth for more than 25 years, I endorse Guidance 125-9 for the protection of youth from unethical and harmful practices.

**Commenter:** Chrissy Marie

3/19/19 1:59 pm

### **Conversion therapy lifelong risks**

Conversion Therapy will leave lifelong destructive factors in a child's life. Understanding aces and trauma informed care maybe you would understand that this needs to cease. Conversion therapy is abusive mentally and leave long last scars damaging the development of the brain.

**Commenter:** Rebecca Ryon

3/19/19 2:03 pm

### **Conversion therapy has no scientific basis**

Conversion therapy is a discredited and harmful practice that must end for the health of our LGBTQ+ youth. Mental health professionals have an ethical responsibility to provide care that

supports the well-being of patients. Please protect the future generations of Virginia by ending this misguided practice.

**Commenter:** Caleb Foster (Survivor)

3/19/19 2:08 pm

**Ban Conversion Therapy.**

To Whom it May Concern,

Fifteen states, in addition to the District of Columbia, have already banned conversion therapy by licensed professionals. This outdated and practice of changing someone's sexuality, is harmful and detrimental to individual's health. I, myself, have been through a program in Virginia and have suffered from depression, low self-esteem, and suicide because of the shame and guilt the program taught me. No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people.

Thank you,

- Caleb Foster

**Commenter:** Nancy-LPC in Virginia

3/19/19 2:11 pm

**Oppose the prohibition of conversion therapy -We're Ethically Bound to Use Value System of Client**

As licensed counselors, when we mandate that a particular type of counseling is not permissible we are breaking the Code of Ethics that we are agreed to when we joined the profession. I do not agree with legislation that prohibits a particular approach to helping clients explore their sexual feelings.

I have been an LPC for over twenty years. I see clients that share my personal values and clients that do not. I am bound by the ethical codes to help them explore their value system and not to impose my values. This can be a challenge and I continually have to evaluate myself to not impose my values but help them explore their own. When someone is feeling opposite attraction, it is ethical to help them explore these feelings. It is also ethical to help them explore their personal values related to these feelings. If they determine that they want to try to move beyond these feelings, then that is their choice. Ethical counselors accept clients where they are without judging them. This can be similar to a person wanting to overcome and change marital unhappiness, stress or other unwanted feelings. Counselors use their training and objectivity to help clients grow in the direction they desire. There have been times when I have felt that a client's value system is so different from my own that I kindly and gently told them that they would be better served by another counselor with more similar perspectives so that I would not be trying to impose my values on them.

**Commenter:** Chris Davin

3/19/19 2:13 pm

### **Ban Conversion Therapy / Curel and Unacceptable**

Conversion Therapy needs to be banned and considered Illegal. No therapies can make anyone something they are not. Brainwashing a person is not going to make a person become straight. A person is who they are. Its like saying hey Straight people you don't like Burger King and your in love with McDonald's come seek conversion therapy and we will make you hate McDonalds and in love with Burger King. You just can not do it. People will be who they want to be. And not one person should take the rights away from anyone. Especially our youth. They do not have a choice to be told to be anything else then what they are or want to be inside and out!

**Commenter:** Alex Gingras

3/19/19 2:20 pm

### **Conversion "therapy" has been shown to lead to depression, substance abuse, and suicide**

These discredited practices take **children** and actively tear down their self esteem, alienate them from their peers, and in some cases even physically harm them. This has been shown to cause severe mental health issues throughout the rest of the childs life, sometimes leading to suicide. Don't allow this abusive practice to continue

**Commenter:** Nicolas Christopher Johnston

3/19/19 2:22 pm

### **Ban Conversion Therapy**

I am a Virginia resident and a queer transgender man. My orientation is not a mental illness. My love for my husband is healthy, kind, and emotionally fulfilling. We have been together for over a decade. My being transgender does not change the fact that I'm a helpful, friendly member of my community- I work on programs related to improving health care, and I'm a volunteer with several different local and national organizations.

Conversion therapy is based on dangerous, outdated "science" that classified LGBTQ orientation as a mental illness. My orientation and my gender identity is not a mental illness, and it's not something that can be cured. The fact is, conversion therapy simply doesn't work, and it does irreperable harm to children and their families. In fact, the leaders of Exodus International, one of the foremost "ex-gay" ministries, have publicly renounced conversion therapy. Conversion therapists are at best misguided and at worst, predatory.

I urge you to ban this medieval practice, and to bring the Commonwealth I love into the 21st century.

**Commenter:** Kelly Roberts

3/19/19 2:22 pm

### **Ban conversion therapy**

Growing up is hard enough without added conversion therapy. It is harmful for youth to be subjected to added oppression from the adults in their lives. They need support and open-minded thinking to grow up into adults who can think for themselves!

**Commenter:** Rev. Dr. David Hindman

3/19/19 2:24 pm

### **Ban Conversion Therapy in Virginia**

I am writing in support of **Guidance Document 125-9, on the Practice of Conversion Therapy**, which would protect youth under the age of 18 from so-called "conversion therapy" at the hands of licensed psychologists in Virginia.

As an ordained minister in The United Methodist Church, and especially as a campus minister at a state university for more than 20 years, I am familiar with the struggles young people especially have with naming and claiming their identity as a LGBTQIA person. That journey of self-discovery and acceptance is impeded and made unnecessarily more difficult when conversion therapy is foisted upon them, or presented as a way out of the sexual identity.

As you well know, the guidance provided by this document will protect youth from so-called "conversion therapy," a dangerous and discredited practice aimed at changing their sexual orientation or gender identity. These dangerous and discredited practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis. These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are; they are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts.

Guidance Document 125-9 provides excellent ways to protect young people from state-licensed therapists in Virginia who falsely claim to parents and youth that being LGBTQ is a mental illness, and therefore taking advantage of parents and harming vulnerable youth.

No one should ever be told that they were made anything but perfectly acceptable as they are. Yet, young lesbian, gay, bisexual, transgender, and queer people are often told that they need to change who they are—or face a life full of rejection by their family, their faith, and God. That message is antithetical to the message of Jesus who embraced all people, and certainly means not to turn away when we see one of our own being singled out and targeted. As a caring Christian and pastor it has been my understanding and commitment to strive to ensure the safety of our children. We cannot lose one more of our own to the depression and suicide these discredited and damaging practices too often cause.

Thank you for taking the time to read my comments.

Yours Truly,

Rev. David M .Hindman Ed.D

Williamsburg, VA

**Commenter:** Mike Beaty

3/19/19 2:26 pm

### **No conversion**

Absolute no to conversion therapy.

Tough enough to accept oneself as is without brainwashing.

**Commenter:** Steve Burner

3/19/19 2:26 pm

### **Ban conversion therapy**

The use of conversion therapy does not help anyone. In fact, it does quite the opposite. To attempt to change a person's sexual orientation or gender identity is to say that there is something wrong with them in the first place... which is totally wrong.

Performing these practices on youth alienates them from the people in their life they should be able to trust: their parents, guardians, and caregivers. Without that trust and that foundation of acceptance, the risk of suicide increases dramatically.

We need to end these practices, especially for youth who are not able to have a choice in this decision.

**Commenter:** Victoria Staubly

3/19/19 2:31 pm

### **Protect LGBT Virginians**

Being LGBT is who someone is. You can't change that... "Conversion therapy" simply forces someone to hide who they are, usually with techniques similar to torture (sleep deprivation, corporal punishment, isolation, etc.) No caring mental health professional should be interested in that to begin with, but religious extremists masquerading as helping professionals can cause irreparable harm to so many kids.

**Commenter:** James Edward Heck

3/19/19 2:41 pm

### **Conversion Therapy is Dangerous and Unethical, Not a Free Speech Issue**

National professional organizations like American Psychology Association, American Psychiatric Association, American Counseling Association, American Social Workers Association, etc. have all found that conversion therapy (CT) is not consistent with sound and ethical practices for licensed practitioners. At the very least, using CT for the purpose of attempting to change an individual's sexual orientation or gender identity or expression is unethical, as it has never been shown as effective in any well-respected peer-reviewed research, and at worst, is likely to be harmful. Enacting guidance 125-9 is not a matter of free speech, as speech that has been demonstrated to do harm is not protected under the US Constitution.

**Commenter:** Christine Robinson

3/19/19 2:45 pm

### **Prohibit licensed providers from attempts to change SO or GI of minors; ensure penalties deter this.**

Please prohibit licensed health providers in Virginia (regardless of what kind of degree allows them to provide "counseling") from attempting to change the sexual orientation and/or gender identity of minors in Virginia, and ensure that that the penalties for attempting to do this will act as a strong deterrent.

No sexual orientation or gender identity is, in itself, a mental illness. Thank you.

**Commenter:** Rev. MaryAnn McKibben Dana

3/19/19 2:49 pm

### **Ban Conversion Therapy**

As a pastor, I have counseled countless LGBT people, including a transgender woman. I was the first person to pray for her by name--the name of the person, the woman, she knows herself to be... the woman she is. I will never forget the look on her face when she heard her name invoked in a prayer to the God who knows and loves her. It was healing. Conversion therapy has been shown to be damaging to the spirit and the psyche; please hold the line on banning it. Our Commonwealth deserves better than this practice which is based in bias and poor science.

**Commenter:** Matthew Stewart

3/19/19 2:50 pm

### **End the harmful practice of conversion therapy**

Conversion therapy and associated practices with the intention to instill doubt and shame in the minds of LGBTQ individuals has no place in modern psychiatric practice or the Commonwealth of Virginia. Conversion therapy has been discredited and condemned at every turn by reputable professional organizations like the APA, and has no proof of success from **credible and valid** research. To be clear, churches and faith organizations would still be allowed to espouse their beliefs on reparative/conversion therapy regardless of the changes in this professional practice guidance, so your spiritual freedom is not threatened in any way. However, licensed therapists and psychiatric professionals have an ethical and moral duty to both beneficent and non-maleficent practice, which must preclude them from utilizing or recommending conversion therapy.

**Commenter:** Ted Lewis, Side by Side Va, Inc.

3/19/19 2:51 pm

### **Side by Side Supports a Ban on "Conversion Therapy"**

To Whom It May Concern:

On behalf of the youth and families of Side by Side (formerly ROSMY), I write in support of Guidance Document 125-9, which would protect youth under the age of 18 from so-called "conversion therapy" in Virginia psychological practice. For over 25 years, Side by Side has provided support and mental health counseling to lesbian, gay, bisexual, transgender, queer, and questioning youth ages 11-20 in Central Virginia. We have witnessed first hand the damage "conversion therapy" has on the mental health and stability of LGBTQ+ youth.

Being LGBTQ+ is not a psychological disorder that needs to be "converted" or "changed." This practice sends a message that there is something wrong with who LGBTQ+ youth are and that they need to be "fixed," when in fact if they are loved and accepted they can truly flourish. Instead of offering to change someone's sexuality or gender identity, LGBTQ+ youth should be affirmed in who they are and provided emotional peer and adult support.

Additionally, there is no credible evidence that this type of therapy works at all. Interestingly, Robert Spitzer, one of the initial leaders in "conversion therapy" has come out against the practice stating in an April 2012 letter to the editor of Archives of Sexual Behavior:

"I believe I owe the gay community an apology for my study making unproven claims of the efficacy of [conversion]/reparative therapy. I also apologize to any gay person who wasted time and energy undergoing some form of [conversion]/reparative therapy because they believed that I had proven that [conversion]/reparative therapy works..."

Even though this form of therapy does not work and even though there is nothing wrong with a young person being LGBTQ+ or questioning their gender or sexuality; LGBTQ+ youth still face intense bullying, harassment, and even violence both at school and sometimes at home. Parents of LGBTQ+ youth may turn to "conversion therapy" as a means to stop the pain their child is enduring. They deserve to know the dangers of this practice and that it will not and cannot change their children. These parents and their children deserve to see counselors who can affirm who they are and provide the emotional support and guidance they need.

We implore you to consider adopting this ban on "conversion therapy" and ensuring LGBTQ+ youth in Virginia are protected, affirmed, and shown the love they deserve.

Sincerely,

Ted Lewis

Executive Director

Side by Side, VA

**Commenter:** Nancy AB

3/19/19 2:54 pm

### **Ban Conversion Therapy**

There is no scientific or moral reason behind conversion therapy - anyone with a BS in counseling or psychology knows that. Ban it and do it now. And ignore the trolls who are flooding this website. Useless and incorrect.

**Commenter:** Elizabeth I. Braverman, Independent

3/19/19 2:56 pm

### **Protect VA LGBTQ Minors from Harmful, Deceptive "Conversion Therapy"**

I strongly urge the Virginia Board of Psychology and the Government of the Commonwealth to condemn and officially ban the unethical, dangerous, and discredited practice commonly known as "Conversion Therapy" from being subjected upon LGBTQ minors. I stand with The Trevor Project and all those sponsoring the efforts to take this important step to support and protect Virginia children and help the ban progress throughout the remaining states to take action.

There is no scientific basis for these practices and a plethora of evidence to indicate extreme detriment to both mental and physical health that all too often leads to depression, suicide, and other dangerous self-harm. No young person should be subjected to this shame - particularly from a licensed medical or mental health professional. The ethical and just course of treatment should be one which is affirming and focuses on mitigating issues related to the LGBTQ community.

**Commenter:** Sarah Ahmed

3/19/19 3:03 pm

### **Conversion Therapy Is Harmful and Dangerous**

No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people.

3/19/19 3:04 pm



**Commenter:** Allison S.

### **Conversion Therapy Should Be Banned**

Conversion therapy is horrific. No one, especially children, should be subjected to it. I cannot believe that there are licensed psychologists who feel that this is acceptable, much less beneficial for their patients. It has long lasting effects and should be banned.

**Commenter:** Sara Correll

3/19/19 3:08 pm

### **Ban conversion therapy**

I strongly support a ban on conversion therapy. As a school counselor, I have worked with students struggling with their sexual orientation and identity. Young people need to feel support and love during this time, not hate and narrow mindedness.

**Commenter:** Holly Sepety

3/19/19 3:08 pm

### **Ban conversion therapy.**

Therapy is beneficial. Conversion "therapy" is not therapy. Please ban this practice as it is physically, emotionally, spiritually and morally harmful and has no benefits for the health of an individual. This is not a medical practice to better the health of a person. This is a belief system being physically forced upon another. Would you want this done to you or your loved ones? I would never. I just recently learned about this practice and was horrified.

**Commenter:** Rev. Daniel R. Willson, Williamsburg Baptist Church

3/19/19 3:09 pm

### **Conversion Therapy Does Harm**

I was raised an independent, fundamental Baptist. In addition, I completed a degree in Bible, with a minor in Biblical languages, at a fundamental, Baptist college. I also studied at a prestigious, evangelical seminary before completing my education at other institutions. I have had, and continue to hold, my faith at the center of my identity. My spiritual journey has led through some unexpected terrain and I am commenting today as a faith leader, and more importantly, as a follower of Jesus.

I have changed my mind. I once held bigoted and hateful views toward LGBTQ+ people - similar to or transcending some of the views expressed here in this forum. However, it is not my purpose here to explain the long and painstaking process that led me to my present conclusions. But suffice it to say that I've concluded along with others that the same Scriptural and theological logic that many conservative Christians use to militate against sexual and gender minorities, is a very similar logic used by Christians who opposed the abolition of slavery in the 19th century and interracial marriage in more recent times. Many conservative Christians would wish to distance themselves from these (now, intuitively) harmful positions, but the historical record is incontrovertible.

This subcultural stasis that is wielded as "gospel" by Conservative Christians misguidedly opposes social progress based on compassion, reason, and understanding, and instead seeks to preserve an oppressive status quo for the illusion of religious fidelity. They read the Bible as a snapshot of the way things should always be (impossible given the Scriptural narrative's diversity!), rather than a hi(story) of liberation that points beyond itself to greater manifestations of God's salvation.

Forgive me for delving into a theological discussion in a public forum, but I feel this matter is particularly relevant. Studies exist that have made solid correlations between LGBTQ+ suicide

rates and the density of conservative Christian churches in a given area. Conversion therapy has been shown repeatedly to be ineffective at anything more than acquiring invasive networks for policing mind and body, as well as manipulative strategies for suppression and denial. The result is trauma of one form or another.

I have counseled people in the aftermath of these traumas and I continue to help young people discern their way through the ignorance and beligerance they experienced in their own families and churches; people who love(d) the church, but felt thrown away by it. If conservative Christians only knew the damage they do to God's very own gifts to the church.

If it is not clear already, this matter is not about silencing or censoring faith-based counseling. I am faith-based. Some of my counseling colleagues (who do not approve of conversion therapy) are faith-based. This is about the goal of doing no harm. And there is a line that separates the "harm" of losing political status as one's viewpoint recedes from public life and the harm that causes actual, psychosocial trauma. If that line is not clear, look at the body count - the lives lost to suicide and depression. This will inform you as to what counts as free speech and what counts as harmful policy.

**Commenter:** Cassidy Jones

3/19/19 3:18 pm

### **BAN CONVERSION THERAPY**

Conversion therapy is dangerous and unfounded and should absolutely be banned..

**Commenter:** Claire Kaplan

3/19/19 3:19 pm

### **Conversion Therapy is Abuse**

So-called "conversion therapy" is highly dangerous and abuse of an extreme nature. Reputable research on this technique shows that it not only fails in its goal but causes severe damage to the mental health of LGBTQ youth, not infrequently resulting in self-harm and suicidality. The Commonwealth has been working to improve our mental health system so that it serves all citizens appropriately. If our legislators genuinely support this goal, why would anyone consider this ideology (for that is what it is) to be a legitimate treatment modality, given that the outcomes are so dire? Conversion therapy is the tool for those who have an agenda of hate, no questions about it. It is time for the Commonwealth to exhibit common sense and ban this abusive treatment that is used against young people.

**Commenter:** Michael Airhart, Alexandria

3/19/19 3:26 pm

### **Conversion therapy undermines religious freedom and worsens sexual dysfunction**

By its intrinsic design, conversion therapy requires youths to falsely blame their parents and relatives for their sexual orientation. Conversion therapy turns those who can help a youth the most into untrusted enemies. In isolating youths from their family and friends, conversion therapy worsens loneliness and sexual recklessness, putting youths' health at serious risk. Conversion therapy is a blatant form of medical malpractice that is intended to abuse minors.

On the religious front, conversion therapists teach their young clients to reject mainstream faith, to stop making religious decision for themselves, and instead to accept the authoritarian and misogynist dictates of the political fringe groups and cults that sponsor conversion "therapy."

Conversion therapy has no legitimate clinical application — and no honest role in advancing freely chosen faith in our communities.

**Commenter:** Carla Herrmann

3/19/19 3:31 pm

#### **Why limit all counselors to one script?**

The problem with banning the free speech and/or faith based narrative of counselors is that you seem to think that everyone who seeks counseling is not capable of having individual thoughts of their own. Not everyone will respond to the same kind of counseling or treatment. There must be options. There is nothing that says that an individual cannot change counselors if they do not feel like they are getting the treatment they desire. **But there are also patients that absolutely need and want a counselor who will help them overcome unwanted same sex attractions or gender dysphoria. How can you ban them from having this option?**

The health regulatory boards have labeled the practice of helping someone overcome unwanted same-sex attractions or gender dysphoria as "conversion therapy," when in reality it should more rightly be characterized as "Biological Affirmation Counseling."

Please do not limit counselors and clergy from treating people with the help and guidance they are seeking. Please do not try to take away the rights of free speech for those who are counselors.

**Commenter:** Catherina Hurlburt

3/19/19 3:36 pm

#### **Conversion Therapy Is Harmful to Minors**

As the parent of a transgender son, who graduated college with honors and is a healthy and fulfilled young adult who now feels whole and happy, I am writing to support guidance that recommends against so-called conversion therapy. Adults have silenced the voices and personhood of young gay, lesbian, bisexual, transgender, agender/asexual youth by forcing them to undergo this dangerous so-called therapy. No one is "silencing" so-called counselors who push this unfounded "therapy." We are asking minors be protected from being forced to undergo this abusive practice that ignores their well-being and wholeness for who they are -- in favor of personal religious beliefs that erase who they are as individuals. This guidance protects young people from state-licensed therapists in Virginia who falsely claim to parents and youth that being LGBTQ is a mental illness, and therefore taking advantage of parents and harming vulnerable youth. These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are. These practices are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts. Please frame the guidance to acknowledge that so-called conversion therapy is a harmful practice that puts youth in danger. Thank you.

**Commenter:** Adelle Settle

3/19/19 3:43 pm

#### **Please ban conversion therapy: dangerous and harmful to children**

Conversion therapy is incredibly harmful to LGBTQ youth. It can lead to self-hatred, depression, and suicide. Being gay isn't a choice. You can't "cure" being gay. But you can hurt a gay child by telling them this lie and forcing them into therapy that teaches that being gay is wrong. Make conversion therapy illegal. Help protect children and prevent suicide.

**Commenter:** John Curry

3/19/19 3:50 pm

**Conversion "therapy" is torture. Support proposed guidelines.**

Conversion "therapy" is torture. History will someday view the practice with the same revulsion with which we now regard female genital mutilation, bloodletting, urine drinking, vaginal fumigation and the like. I have personally known a man who was forced into conversion therapy as a child, and I know a man who was a conversion therapist himself. Both are outspoken against the practice. Both are living proudly as gay men, and are prominent in their communities. Spurn the hateful supporters of conversion masquerading as champions of freedom and make policies based on scientific best practices.

**Commenter:** M. Lewis

3/19/19 3:55 pm

**Ban conversion therapy**

I am a retired psychologist formally licenced licensed in Va. I cannit believe the stupidity of the comments in favor of conversion therapy, edpecially under ghe auspices of fir speech. That is a laughable argument that somw ultra conservative group told their sheep to say. I know the board is smart enough to see thru that. Psychologists are required to treat with proven therapeutic modalities. Conversees ion tgerapy foes not meet that requirement.Please protect kids and ban this harmful, ineffective and arcane practice. Thank you

**Commenter:** Joe George

3/19/19 3:56 pm

**Ban Conversion Therapy**

There is no reason for continuing conversion therapy unless you enjoy torturing youth.

**Commenter:** Jason Sparks

3/19/19 4:05 pm

**Ban Conversion Therapy.**

I am a resident of Arlington, VA, 22202. As a resident of the Virginia, I support a ban on conversion therapy. Conversion therapy is a dangerous and discredited practice aimed at changing their sexual orientation or gender identity. These dangerous and discredited practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis.

These practices are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts. Conversion therapy is a harmful practice using rejection, shame, and psychological abuse to force young people to try and change who they are.

No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people.

**Commenter:** Christian Matheis

3/19/19 4:13 pm

**Conversion Therapy is Pseudoscience Leading to Torture**

Conversion therapy relies on pseudoscience, is motivated by the desire to inflict cruelty, and results in the same physiological, psychological, and cultural results as other forms of torture. The people who push the conversion agenda simply wish to harm a particular group and take pleasure in inflicting cruelty, all while claiming to justify it through pseudoscience.

**Commenter:** Rebecca

3/19/19 4:19 pm

### **End Conversion Therapy In Virginia**

As a Virginia resident and voter, I believe Virginia should put an end to conversion therapy for minors. There is an abundance of evidence that conversion therapy does not work and is extremely harmful, sometimes even fatal. Virginia needs to protect our youth from abuse and ensure that therapists who are licensed by the state are providing competent care and are not harming patients.

**Commenter:** Mike Sullivan

3/19/19 4:26 pm

### **Conversion therapy is unscientific con artistry**

Conversion therapy is nothing more than a method for people with specific religious beliefs to express their distaste for LGBTQ people and attempt to shame and bully them into the closet. There is no evidence that conversion therapy is effective; in fact, conversion therapy has been shown to be first and foremost, harmful to the subject. Virginia should ban the practice as Viola 2 of any clinician's Hippocratic oath, and as an impermissible masquerading of religious proselytization as state-regulated therapy.

**Commenter:** Matthew Hatcher

3/19/19 4:30 pm

### **Why prohibit what the patient wants?**

Many patients desire to leave behind the homosexual lifestyle for various reasons. There have been many studies that suggest success in becoming ex-gay (Stanton L. Jones and Mark A. Yarhouse, Ex-gays? (Downers Grove, InterVarsity Press, 2007), and case studies involving identical twins having different sexual preferences that place doubt on a "gay" gene. Without hard science behind this pro-LBGTQ bias, these regulations simply become social engineering in a particular agenda-driven direction. Give patients the FREEDOM of choice, the parents the FREEDOM of choice for their children, and allow diversity to thrive...true tolerance involves individuals who believe homosexuality is wrong living with individuals that enthusiastically support that lifestyle. Let free speech and open dialogue, paired with the practical consequences inherent with both ideologies to bear their own fruit.

**Commenter:** LEAH MARIE HARRIMAN,

3/19/19 4:35 pm

### **Don't do this to your children**

Please don't put your children through hell in back based on your twisted beliefs

3/19/19 4:36 pm

**Commenter:** Ryan Glanzer

### **Ban Conversion Therapy**

Conversion therapy is an extremely harmful practice that has no scientific or medical basis. It is instead based on outdated, ignorant, and discriminatory views of sexual orientation and gender identity and allows for the perpetuation of damaging stigmas. Some would argue that banning conversion therapy would be an intrusion on the moral or religious beliefs of those who practice it or who seek out the services of practitioners. However, even if true, it is a necessary and understandable intrusion. Allowing such a practice to continue would be to allow the ongoing, sanctioned, and protected practice of physical, emotional, and psychological abuse. No matter the underlying reasons or intentions and even if the practice comes from a place of love or from a deeply held belief in its value, the potential outcomes will remain the same—shame, depression, isolation, self-loathing. And such pain and suffering does not fade easily.

I grew up gay in a conservative household and as part of a conservative and religious community. I consider myself lucky that I was never exposed to formalized conversion therapy or a similar practice. (Though I believe the only reason my parents did not consider an option or were not pressured to consider it an option is because I remained fiercely secretive about my sexuality until well after college). However, even though I was not subjected to formal “conversion therapy,” I was (almost daily) exposed to the underlying principles—that being gay is some sort of mental illness or personal failure or societal ill that is necessary to change. And even this very basic exposure to such misconceptions or ill-conceived ideals at a young age has left me to struggle with emotional and psychological issues well into adulthood. I have dealt with periods of extreme self-hatred and have often questioned my value. I have spent years isolating myself from my family and refusing to trust anyone. Ultimately, my view of myself and my worth was dictated to me by what my community defined. And again, this was not even the product of official, formalized “therapy” in any way.

Therapists, counselors, psychologists, and other trusted practitioners in similar professions should be the counter force to mental and emotional abuse—not the ones to inflict it. When young people are struggling to understand who they are and how they identify and grappling with their self-worth, they should be supported and guided in a way that 1) is in line with accepted and scientifically based medical and psychological practices and 2) does not completely disregard or devalue any aspect of that identity. Therapy should seek to heal a person in need, not inflict greater wounds. And telling young LGBT youth that who they are fundamentally is wrong or sinful or an illness does just that—it intentionally inflicts pain and quite possibly causes irreparable damage.

**Commenter:** Amanda Traud

3/19/19 4:36 pm

### **Conversion therapy is cruel and unusual punishment**

These dangerous and discredited practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis.

These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are.

These practices are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts.

No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people.

We can't allow one more young person to be targeted and hurt by these dangerous and discredited practices.

**Commenter:** Jeanne Murphy Murck

3/19/19 4:37 pm

### **Conversion Therapy Destroys Lives**

I applaud the Virginia Board of Psychology's move to provide guidance to practitioners that conversion therapy is not acceptable. Every major professional mental health organization in the country opposes conversion therapy. The APA stated clearly that "No credible evidence exists that any mental health intervention can reliably and safely change sexual orientation; nor, from a mental health perspective does sexual orientation need to be changed." Much more data exists that show that this type of therapy is harmful and destroys lives. Please move forward with the needed regulations today.

**Commenter:** M Rose

3/19/19 4:39 pm

**Counselors should be allowed to help their clients with all sexual matters they may be asking about.**

**Commenter:** Mark J

3/19/19 4:39 pm

**Ban conversation therapy !**

**Commenter:** Steph White

3/19/19 4:41 pm

### **End this cruel "practice" and violation of civil liberties**

Conversion therapy is cruel and should be deemed a violation of civil liberties for young adults and emotional abuse for minors. Any person engaged in this egregious practice is manipulating people for money and ideology, should have their license revoked and needs to be shut down. I cannot bear to see psychologists in our Virginia and our country willfully subject kids and young adults to this. Stop conversion therapy now. Let people be who and what they believe themselves to be, free of the intolerance behind it.

**Commenter:** Ryan

3/19/19 4:43 pm

### **Unethical and Dangerous**

Providing treatment without sound unbiased research is unethical and dangerous for those it is used upon. It creates a culture where personal opinions on disorders guide treatment, rather than replicable medical treatment which improves the condition and improves the emotional well being of the participant. It also opens a door to allow conversion therapy forcibly in the future because a persons sexuality is called into question. At what point would you draw a dividing line to determine the sexuality of an individual? Can an accusation by another individual now necessitate forcible conversion therapy for your own children if we validate it with legislation or guidelines putting it in the same category as a disorder listed in the DSM V? Regulation of an unapproved treatment does not change the fact that there are no recognized medical professions that identify the validity

of this as a treatment, nor the benefits to the individual it is being used upon. Additionally secularization of the state, as well as separation of church and state was enshrined in the Constitution. As a state body, supporting legislation that endorses a religious medical treatment, creates a precedent to support other religions introducing legislation to medically "treat" individuals of disorders that they believe they possess. This sets a dangerous precedent not only for the population immediately impacted by this legislation to only "regulate" conversion therapy, but also for the overall population to now fall subject to the whims of whatever disorders other religious bodies feel they suffer from, and what an effective treatment looks like. Prohibition of conversion therapy, not regulation, is needed.

**Commenter:** David Rice

3/19/19 4:44 pm

### **Protect LGBT Youth**

Conversion therapy does significant harm to those who are least able to protect themselves. While restricting the freedom of people should be viewed cautiously, the times when it is most appropriate are those times when the State can step in to protect the weak. We make it illegal for parents to abuse their children, even those who do so under the guise of discipline, because we recognize that the State has a moral duty to protect people from others. Conversion therapy is abusive, it has been shown to lead to significant harm both in the immediate and in the long-term, and it tries to solve a problem that doesn't exist - studies repeatedly find that the suffering of LGBT children and teens comes from the social stigma and the bullying, and when those teens are put in supportive environments they thrive. Conversion therapy only serves to further stigmatize and shame those children who are forced into it, and the State has a strong interest in protecting them from that.

**Commenter:** Richard Keech

3/19/19 4:47 pm

### **Ban Conversion Therapy**

Conversion therapy has no scientific basis. In fact it has been proven that it does not work time and time again. Do the right thing and ban this harmful, hateful, damaging practice.

**Commenter:** Deb Vaughan

3/19/19 4:47 pm

### **Banish Conversion Therapy from Virginia**

Conversion therapy has been constantly discredited as a therapeutic practice. It does more harm than good to young people. It has been proven to do long term psychological damage. Emotionally damaging and many times painful and abusive practices are used. The children of Virginia deserve better!

**Commenter:** Jessica Rogers

3/19/19 4:53 pm

### **Conversion Therapy Is Life-Threatening Voodoo**

I strongly support a full ban on conversion therapy. It is unscientific, and outright harmful to vulnerable LGBTQ individuals. Intolerance has no place in Virginia's legal or medical practices.



**Commenter:** Grace Wang

3/19/19 4:56 pm

### **Conversion Therapy is torture**

It's been proven time and time again that conversion therapy both does not work and hurts the patient. Our sexuality is not something to be fixed!

**Commenter:** Sarah Ahmadia

3/19/19 4:57 pm

### **Protect our LGBTQ Youth From Abuse**

Please ban conversion therapy. It is a dangerous, unscientific practice that can lead to severe self esteem issues at best, or suicide at worst. I personally know people who have been subjected to this therapy, and it was a horrible experience for both of them. Both of them were, are, and forever will be LGBTQ. It is who they are in their cores, and to counsel them otherwise constitutes mental abuse.

**Commenter:** Paul J Perrone

3/19/19 4:58 pm

### **Do Not Restrict Counselors From Offering Sound Counsel**

It is amazing to me that the state would want to restrict licensed counselors from offering their professional advice regarding gender confusion. To censor them is not only unconstitutional, but also wrong and dangerous. These proposed regulations have nothing to do with science or helping, but a political payoff to a well-funded group with an agenda. These regulations would deny patients the right to direct the objective of their counseling but would instead put in place a political agenda.

**Commenter:** Sarah Drain

3/19/19 5:04 pm

### **This bill is UNCONSTITUTIONAL!!**

It saddens me that this bill is even being considered! It's blatantly unconstitutional and that's just the tip of the iceberg!!! Does the constitution mean anything to any of the legislators promoting this bill?!!

**Commenter:** Mary Haak

3/19/19 5:05 pm

### **Ban Conversion Therapy**

Please ban "conversion therapy" on minors. There is broad consensus in the scientific and medical communities that sexual orientation and gender identity are immutable traits. Groups including the American Psychological Association and American Academy of Pediatrics condemn the practice and support a ban stating that such "therapy" is not only ineffective, but poses serious dangers to patients particularly teens who are forced to undergo treatment by their parents. Please protect our vulnerable youth from this practice.

3/19/19 5:13 pm

**Commenter:** Martha Judson, parent advocate

**NO conversion therapy**

Conversion therapy should be against the law. Counseling/therapy should support the LGBTQ person for who they are, not what someone else thinks they should be. Conversion therapy is harmful on so many levels, don't try to fix something that isn't broken!!?

**Commenter:** Steve G

3/19/19 5:17 pm

**Ban Conversion Therapy in Virginia**

Conversion therapy is cruel and unusual punishment.

**Commenter:** EF

3/19/19 5:32 pm

**Ban Conversion Therapy**

Conversion therapy harms LGBTQ individuals and should not be allowed here in Virginia. Please protect LGBTQ+ youth!

**Commenter:** Jillian Strand

3/19/19 5:33 pm

**BAN CONVERSION THERAPY**

These are our children! This practice is harmful. Children would rather take their lives and THAT is completely unacceptable!!

**Commenter:** Carolyn J Lawson

3/19/19 5:38 pm

**Ban Conversion Therapy**

The State of Virginia should listen to health care and mental health professionals and BAN conversion therapy. These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are.

These horrible, misguided (at best) practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis.

This guidance protects young people from state-licensed therapists in Virginia who falsely claim to parents and youth that being LGBTQ is a mental illness, and therefore taking advantage of parents and harming vulnerable youth.

No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people.

I implore you to BAN Conversion Therapy in the State of Virginia.

**Commenter:** Kaiden Spicer

3/19/19 5:42 pm

**Ban conversion therapy**

Conversion therapy is child abuse. There is no grey area. There is no wiggle room. Those that practice it are abusers. Those who send their children off to be "converted" are abusers. Those who say "I wouldn't do it, but that's their rights as parents." are abuse apologists.

**Commenter:** John Shea

3/19/19 5:50 pm

**No Conversion Therapy**

It is damaging to people.

**Commenter:** Jennifer Wainright

3/19/19 5:55 pm

**Ban Conversion Therapy**

Adults should be allowed to engage in any type of therapy they choose, but minors should not be subjected to "therapy" that is condemned by both the American Psychological Association and the American Psychiatric Association.

<https://www.psychiatry.org/newsroom/news-releases/apa-reiterates-strong-opposition-to-conversion-therapy>

<https://www.apa.org/pi/lgbt/resources/just-the-facts>

**Commenter:** John Barrett

3/19/19 5:56 pm

**Ban Conversion Therapy**

Ban this barbaric form of therapy. Individuals know who they should be or want to be. They do not need to be told through spiritual interventions that they are wrong. They are perfectly normal and should not be shamed.

**Commenter:** Karen

3/19/19 5:56 pm

**Ban Conversion Therapy.**

Please ban this abomination that takes the name of "therapy". Real counselors and therapist know how harmful this is to a clients psyche. This isn't a personal bias situation, and as a therapist our bias should never enter the room. It is harmful and Virginia needs to recognize this long known fact now.

**Commenter:** Derek Fuzzell

3/19/19 5:59 pm

**Conversion Therapy Should Be Illegal**

Conversion therapy is an abhorrent practice and has been found by leading medical and psychological journals to be damaging to the individuals subjected to it. Keep conversion therapy out of Virginia. It has no place in our Commonwealth.

**Commenter:** Drake Hoffman

3/19/19 6:02 pm

### **Suppression of Physician's Free Speech Rights Regarding Unwanted sexual Desires**

Not all teenagers going through puberty have genuine sexual desires inherent in the opposite sex. Some may be confused about what they occasionally feel/experience and need help separating their thoughts. Some may therefore obtain help through counselling, others may not. Doctors should not be prevented from helping them sort out real/genuine feelings from the occasional feelings which may be irrelevant.

**Commenter:** Efstathia Kalapothakos

3/19/19 6:02 pm

### **Ban Conversion Therapy**

We are in a world of acceptance and love. Virginia took a great stand assisting those with mental illness by opening no wait mental health clinics and that is amazing. Now take one more step forward and stop this backwards therapy that not only further anguishes those that are open with their sexuality but can cause suicidal thoughts, disengagement from community, and self harm from occurring because someone feels that homosexuality is harmful when in fact ALL signs point to it being a natural feeling of love towards the same sex that NO ONE can mentally stop from occurring. Please ban this therapy and welcome assistive care to those mistreated and abused due to their sexuality.

**Commenter:** Jack Tignor, Student(Norfolk Academy)

3/19/19 6:05 pm

### **Conversion Therapy MUST Be Banned**

After doing extensive research on the subject of conversion therapy in order to prepare for a speech I gave to my middle school in January, I was able to see and convey to my fellow students in the middle school that conversion therapy causes extremely harmful side effects like many personality disorders like depression, anxiety, and PTSD; it uses inhumane tactics that are obsolete and harsh, and it does not and simply cannot change one's sexual orientation or gender identity.

Conversion therapy is widely known for the detrimental effects it causes and the high rate of suicide in those who have undergone the therapy. In an article entitled, "Change," Efforts Double and Triple Rates of Depression, Suicide Attempts, Decrease Self-Esteem, Social Support, Education & Income in Young Adulthood, written as a part of the Family Acceptance Project by writer Cathy Renna describes how rates of suicide are drastically increased when member of the LGBTQ community undergo conversion therapy, "Rates of attempted suicide by LGBT young people whose parents tried to change their sexual orientation were more than double (48%) the rate of LGBT young adults who reported no conversion experiences (22%)." It is evident how drastically conversion therapy and its outrageous techniques increase levels of suicide in LGBTQ teens. Not only do the levels of suicide increase, rates of attempt also drastically increase. In a study conducted by the Journal of Homosexuality, a peer reviewed journal studying homosexuals and mental health, in which 245 people of the LGBT community between the ages of 21 and 25 completed a series of mental health measures and the study concluded that, as Jack Turban states in his November 2018 Psychology Today article entitled, Gay Conversion Therapy Associated with Suicide Risk, he states, "Those whose parents enlisted the help of a professional,

a therapist, or religious leader to change their sexual orientation had a five-fold higher odds of having ever attempted suicide." The journal concludes how drastically suicidal attempts increase because of the therapy, not homosexuality. It is clear how conversion therapy significantly increases suicide rates and attempt of suicide.

The methods used in order to attempt to change one's sexual orientation or gender are outrageously outdated and could even be considered torture. Samuel Brinton, a gay man that was forced by his father to undergo conversion therapy at the age of 12, speaks of the horrifying methods of therapy that he underwent in an interview in a 2011 October article entitled, "Victim of Baptist gay conversion therapy describes how he was tortured at 12, from The Daily Mail, "Freezing ice cubes were placed in his hands while he was shown pictures of men hugging - so that he would associate pain with intimacy between men. He was then repeatedly burned when shown similar images but untouched when images of men and women together were shown." From Samuel Brinton's story it is clear that conversion therapy uses techniques that are obsolete and cruel for those who undergo sexual orientation change efforts. In addition to the horrific techniques that were used on Samuel, therapists that administer conversion therapy usually also work to instill a self-hatred in their patients in an attempt to "convert" those who undergo therapy. Therapists instill this feeling by telling those who undergo conversion therapy that something is wrong with them or by teaching patients to hate the concept of homosexuality.

This therapy has been proven to only create a hatred for oneself not one's sexuality or gender. Because therapists administer this therapy as medical treatment they are able to use techniques of harsh abuse and inhumane nature with impunity. These techniques leave survivors of conversion therapy permanently damaged and can ruin lives. In a January 2018 New York Times Article entitled, "I Was Tortured in Gay Conversion Therapy. And It's Still Legal in 41 States," a survivor of conversion therapy recounts, "The therapist ordered me bound to a table to have ice, heat and electricity applied to my body. I was forced to watch clips on a television of gay men holding hands, hugging and having sex. I was supposed to associate those images with the pain I was feeling to once and for all turn into a straight boy. In the end it didn't work. I would say that it did, just to make the pain go away." This horrifying story shows how harsh and outdated the techniques used to attempt to change one's sexual orientation are. When therapists attempt to change a homosexual's orientation they use obsolete and harsh treatment methods that are torture and should no longer be practiced.

Finally, conversion therapy is baseless. It has recently been proven that homosexuality, contrary to the ideas promoted by supporters of conversion therapy practice, is not a choice for homosexuals. As Andy Coghlan, a writer for the New Scientist, states in his December 2017 New Scientist article entitled, What Do the New 'Gay Genes' Tell Us About Sexual Orientation, Coghlan states, "The latest findings open the prospect to identifying the whole pathway of genes involved in both homosexual and heterosexual orientation, says Dean Hamer at the US National Institutes of Health," Hamer continues on to say, "It adds yet more evidence that sexual orientation is not a 'lifestyle choice.'" Hamer's findings only further proof that conversion therapy is a baseless practice that does not and cannot change one's sexual orientation or gender. There is no logical basis for conversion therapy because homosexuality is hereditary. The lack of success in changing one's sexual orientation or gender proves that homosexuality is natural and cannot be changed through therapy. Tia Ghose brings up this lack of success in the therapy in her April 2015 Live Science article entitled, "Why Gay Conversion Therapy is Harmful, Ghose states, "In 2009, an American Psychological Association task force conducted a review of studies on gay conversion therapy between 1963 and 2007. They found that sexual-orientation change was uncommon; participants continued to be attracted to members of their own sex and not to those of the opposite sex." The study conducted by the APA clearly shows how deeply the lack of success in the therapy roots in its past.

In conclusion, conversion therapy has been proven to cause significantly increased levels of suicide, uses extremely inhumane methods, and has been proven through numerous studies that it does not and cannot work. More horrific stories like that of Brinton's happen every day, but if the Board of Psychology protects LGBTQ+ youth from the practice then thousands can be saved from this horrific and immoral practice.

**Commenter:** Dianne Lane

3/19/19 6:06 pm

**Bunk!**

Gender identity and sexual orientation are not mental illnesses that require treatment to force alignment to social mores or norms. This debunked practice (see works by the AMA and Pediatric Academy) that document the harm and consequences of such discredited practices. Virginia needs to protect its children from misguided adults who engage in conversion therapy due to sexual or religious bigotry. Ban conversion therapy and hold accountable those who would order and/or practice it.

**Commenter:** Rev. Dr. Leah Grundset Davis

3/19/19 6:12 pm

**Ban conversion therapy**

Conversion therapy causes harm and trauma to those who are forced to submit to its practice. The Commonwealth of Virginia believes in care and love for all its people. Conversion therapy stands in opposition to my Christian belief that all people are created as beloved children of God.

**Commenter:** David Ensign, Clarendon Presbyterian Church

3/19/19 6:14 pm

**ban conversion therapy**

First, do no harm. That has long struck me as the medical practitioners' version of the Golden Rule common to all of the world's great religious traditions. In my faith, we follow the Rabi Jesus, who said "do unto others as you would have others do unto you."

In practice that looks like, first, doing no harm. It also looks like acceptance of each child created in the Divine image. It looks like respect for each child as created. It looks like love.

Conversion therapy looks like none of that. It does demonstrable, measurable harm. It shows no respect or acceptance, and it is not loving. It should be banned.

**Commenter:** Timothy Shaw

3/19/19 6:17 pm

**Ban Conversion Therapy**

As a Virginia resident and taxpayer, I strongly support a ban on conversion therapy for minors. Empirical study has found that this practice is harmful, and it is condemned by both the American Psychological Association and the American Psychiatric Association.

<https://whatweknow.inequality.cornell.edu/topics/lgbt-equality/what-does-the-scholarly-research-say-about-whether-conversion-therapy-can-alter-sexual-orientation-without-causing-harm/>

<https://www.psychiatry.org/newsroom/news-releases/apa-reiterates-strong-opposition-to-conversion-therapy>

<https://www.apa.org/pi/lgbt/resources/just-the-facts>

3/19/19 6:19 pm

**Commenter:** Shannon Daniels

### **BAN CONVERSION THERAPY**

**Commenter:** Laura Mayer, George Mason University MSW Student

3/19/19 6:24 pm

#### **Ban Conversion Therapy**

As a MSW student, a crisis intervenrionist and an Applied Suicide Interventions Skills Trainer, I strongly disagree with conversion therapy and have witnessed first hand the devastating effects. Exploring a clients sexuality is not conversion therapy and I strongly disagree with any licensed professional who uses these concepts interchangeably and who practices with the intention of utilizing conversion therapy techniques when exploring a clients sexuality.

This guidance will protect youth from so-called "conversion therapy," a dangerous and discredited practice aimed at changing their sexual orientation or gender identity.

These dangerous and discredited practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis.

This guidance protects young people from state-licensed therapists in Virginia who falsely claim to parents and youth that being LGBTQ is a mental illness, and therefore taking advantage of parents and harming vulnerable youth.

These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are.

These practices are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts.

No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people.

We can't allow one more young person to be targeted and hurt by these dangerous and discredited practices.

**Commenter:** Dominique Schmieder, Student (Roadstead Montessori Highschool)

3/19/19 6:25 pm

#### **BAN IT!!!**

Sexual orientation conversion therapy is a gross and disgusting practice that harms children psychologically and even physically, and it can't be continued. As an LGBTQ+ youth myself, I can't stand the thought that others might be going through this horrendous experience and might be made to think that being who they are is wrong. No one should be put through that trauma. LGBTQ+ youth already experience higher rates of bullying, homelessness, and suicide. Being gay, bi, pan, trans, non binary, etc isn't a choice and all these organizations and programs do is make kids feel bad about themselves and make them feel that just being themselves is wrong. It needs to stop. Before more people are scarred and tortured in these sickening processes, and I hope those who have gone through it can relax knowing no others will suffer what they have.

**Commenter:** E.J. Smith

3/19/19 6:27 pm

### **BAN CONVERSION THERAPY**

Please Ban Conversion therapy. As a licensed mental health provider, I can say that Conversion Therapy is an abhorrent, abusive practice and has been found by leading medical and psychological journals as well as the APA to be damaging to the individuals subjected to it. Keep conversion therapy out of Virginia and revoke the licenses of anyone who practices it. It has no place in our Commonwealth.

**Commenter:** Andrew

3/19/19 6:28 pm

### **Conversion Therapy**

Conversion therapy destroys a persons mind. It teachers youth that a part of them is wrong and they spend their whole lives unhappy and trying to fix that. Young LGBTQ+ kids are in danger. Conversion therapy is mentally abusive and often also physically abusive.

**Commenter:** Connor McAlevy

3/19/19 6:28 pm

### **Conversion therapy is backwards and a dark part of Virginia's history**

Conversion therapy hinges on the assumption that homosexuality is a mental illness, which is patently false and dangerously ignorant of widely accepted fact. The therapy itself is harmful and counterproductive to a forward thinking commonwealth and should be treated with the same severity if practiced as malpractice/hatred of a sexuality. Virginia should lead the charge in outlawing such disgusting practices - please remove it as law in this great commonwealth.

**Commenter:** Kent

3/19/19 6:28 pm

### **This CANNOT be allowed!**

Anytime you try to ENFORCE the will / thoughts of one person over another, you SUPPRESS that persons freedoms, They're are laws against that for a REASON! This practice has been proven to be ineffective to say the least.

**Commenter:** Camelia Roberson, Norfolk Academy (student)

3/19/19 6:32 pm

### **this souldnt be a debate, BAN CONVERSION THERAPY**

I can't believe we still have to talk about this. Conversion therapy is essentially torture; why are we still allowing torture? Being gay isn't, and never will be a sin. There are countless horror stories of young gays going through conversion therapy; a quick google can tell you that. It's deeply saddening that people think this is okay as long as it's in the name of religion.

3/19/19 6:35 pm



**Commenter:** Jasmine LeClair, Norfolk Academy

### **Ban conversion therapy.**

What has the LGBTQ+ community ever done to you? Why do we deserve less than the average person? African Americans were once discriminated against and thought that they were less than everyone else. It's now unacceptable to act as if they aren't the same as us. Why is the LGBTQ+ community any different. What have we done to deserve the harsh treatment that goes along with conversion therapy? Why are we less than you? Why do we not deserve to exist? You will be putting many lives in danger with this.

**Commenter:** Deanna Bayer, Citizen of Virginia

3/19/19 6:41 pm

### **Stop Conversion Therapy**

Conversion therapy is torture of children & has been declared unconstitutional many times by SCOTUS. It does severe psychological harm that stays with children thru' adulthood. We condemn other countries for brutality to children, yet we allow it in the name of religion. I do not remember Jesus saying it was okay. No adult, no elected official, no parent should ever condone this child abuse. Many states have already outlawed CT. VA should also. So called religious groups make hundreds of thousands of dollars by committing kids to these CT Camps. That is why they do it. But they are damaging physically & emotionally children. Protect them. Protect their future psychological health.

**Commenter:** Eli Lehrer

3/19/19 6:48 pm

### **Ban Conversion "Therapy"**

My name is Eli Lehrer. I'm a resident of Fairfax County, Virginia. I have been married to my wife Kari for 14 years and we have a son who is 11 years old. I am a conservative Republican who served as speechwriter to a Republican majority leader of the United States Senate. I have also held positions with the Heritage Foundation and American Enterprise Institute. I currently head the R Street Institute, a national conservative think tank located in Washington, D.C. I also serve, in a volunteer capacity, as national treasurer of the Log Cabin Republicans, an organization for LGBT republicans and their straight allies. My values are conservative: I believe in free markets, limited government, civil liberties (including those guaranteed by the Second Amendment) and individual responsibility. I am writing on my own behalf as a Virginia citizen and not necessarily as a representative of any of the organizations for which I am associated.

My own views are grounded in the fundamental truth that strong families are the foundation of a strong society. Conversion "therapy" for children is highly likely to be socially harmful because it weakens families. Parents who subject a child to almost certain-to-be-ineffective therapy dedicated to changing a fundamental fact of that child's identity are highly likely to damage their relationship with that child. Children subject to such "therapy" are more likely to doubt their own ability to form the lasting romantic relationships with other individuals that are the foundation of a strong society. In the unlikely event that such "therapy" were to convince a given LGB youth to avoid all romantic relationships in the future (the only way in which it could even might "work"), it would still be harmful to society because this decision would necessarily reduce the number of two parent families which provide the best setting for raising children.

There are, of course, many other medical and ethical reasons to believe that conversion therapy conducted in the course of medical practice out to be banned. Others with medical credentials are better qualified than I to comment on them. But allowing anybody to practice it under the color of medicine is a mistake and would weaken Virginia families.

**Commenter:** Bryn Karaus

3/19/19 6:49 pm

**Conversion therapy is emotional abuse and cannot be endorsed or tolerated in the United States or VA**

"Conversion therapy" has no basis in science or medicine or research. It is a theory promulgated by bigots who care not about the severe emotional, psychological, and physical harm they cause. It should have no place in the United States or the Commonwealth of Virginia.

**Commenter:** Tamara Christie

3/19/19 6:49 pm

**Support for Conversion Therapy Ban**

Conversion therapy is not effective, and to suggest that someone's sexual orientation needs to be converted is barbaric and cruel. Mental health professionals have no business attempting to conduct a 'therapy' that is not scientifically based.

**Commenter:** Denis

3/19/19 6:52 pm

**Ban conversion therapy**

How about stop trying to change someone and love them for who they are, especially if they're family!

**Commenter:** Debra Marks, PsyD

3/19/19 6:54 pm

**Support for Conversion Therapy Ban**

I actively support the **BAN** of such interventions that are provided under the guise of psychological treatment that are only designed to promote a moral rather than an ethical or humane agenda -

**Commenter:** Sonia Z

3/19/19 6:54 pm

**Ban conversion therapy!**

There is no valid scientific evidence that sexual orientation can be changed. Subjecting individuals to these pseudo-scientific practices is barbaric and abusive. It is especially harmful to young persons - children and teenagers - who are just beginning to discover their sexual identities. Please ban conversion therapy and protect our LGBTQ community members.

**Commenter:** Heather Corton, student

3/19/19 6:55 pm

**BAN CONVERSION THERAPY!!!!!!!!!!**

BAN CONVERSION THERAPY!!!!!!!!!! As a LGBT+ student considering college in VA, it hurts to know that people my age are going through this terrible process in the name of a "cure". The

suffering conversion therapy says it cures one of is actually the cause. It is harmful, disgusting, and downright evil. Ban conversion therapy!!!!!!

**Commenter:** David Dooley

3/19/19 6:59 pm

**Conversion Therapy does NOT help the subject of the therapy or the community.**

**Commenter:** Mina Attia, James Madison University

3/19/19 7:02 pm

**Regulations to ban conversion therapy**

I am writing in full support of regulations to ban the practice of "conversion therapy" in the Commonwealth of Virginia. This practice has been found to cause more harm than good and be detrimental to the lives and mental health of individuals. It is not an evidence-based practice and does not have any backing through research that shows that it is effective. This practice has been shown to cause shame, depression, and suicidality in individuals. On the contrary, affirming one's sexual orientation has shown to have positive outcomes for this population. The Commonwealth of Virginia, in its strong roots in social justice and advocacy for minority populations, should look to the stance of all medical, psychological, and counseling professional organizations, (such as AMA, APA, and ACA, just to name a few), in condemning any practices of conversion therapy. If the goal of the Commonwealth is to have a healthy and well adjusted society, we must stand firm against any such practices, as conversion therapy, that promote negative health outcomes. Thank you, Dr. Mina Attia

**Commenter:** Courtney Stuart

3/19/19 7:03 pm

**Ban Conversion Therapy!**

**Commenter:** H Smith, Virginia Tech

3/19/19 7:04 pm

**Support for Conversion Therapy Ban**

Conversion therapy or any other efforts to influence or change a client's sexual orientation, gender identity, gender expression, or other similar identities are unethical, and harmful, in numerous ways. As clinicians, we are ethically bound to do no harm to and pursue treatments that are appropriate and are the best possible solution to the issue(s) the client is motivated to change. In addition, sexual orientation and gender identity, whether heterosexual, homosexual, cisgender, transgender, or anything in between, are normal variants of social identities that everyone holds. Because of this, sexual orientation itself has shifted from a previous pathological perspective and is now deemed a normal human experience. Gender dysphoria, being a functionally impairing experience, is only deemed pathological due to the psychological ramifications. Knowing these facts, inducing harm on your clients because of any moral, personal, or other issue is unethical as evidenced by the nature of the subjects and how they cannot be changed, influenced, etc. More importantly, sexual orientation and gender identity/expression do not need to be changed, in fact they are prominent cultural identities for clients and it is our duty to approach what we do and do not know with unconditional empathy in order to fulfill our ethical duty to serve our clients in the best way that we can.

**Commenter:** Heather Tiffany-Virginia Tech Counselor Education Student

3/19/19 7:07 pm

**Support for Conversion Therapy Ban**

Hello,

As a 1st year counseling student and learning about the different ethical dilemmas that can occur within the field, conversion therapy seems to be an obvious violation of ethical practice to me. Banning this form of therapy, which has little to no ground with evidence based findings, would support the ACA code of ethics and internal oath to the counseling profession to "do no harm". I support this ban; regardless of my religious affiliation, personal values, or political stance.

**Commenter:** Ronnie Lee Bailey

3/19/19 7:11 pm

**Conversion Therapy is Barbaric**

I can't even believe this needs to be said, much less that you'd consider public comments on it. Human dignity is not subject to discussion, full stop. Shame on you.

**Commenter:** Janet Shlanta

3/19/19 7:13 pm

**Support for Conversion Therapy Ban**

No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people.

**Commenter:** WD

3/19/19 7:15 pm

**religious counseling is not the same as licensed medicine**

Citizens expect medical professionals like psychologists to provide treatments vetted by licensing organizations and their peers in the medical profession. According to *The Lancet*, conversion therapy "is not condoned by any mainstream US psychiatric, paediatric, or psychological associations" and can be harmful to patients (2015). Someone I knew had such treatment and it was harrowing for him and did not change his sexuality. He was an adult, but adolescents subjected to such approaches may have no say in the matter, forcing them into a situation in which they are risking a potentially harmful treatment against their will. If people wish to seek religious counsel from a minister, priest, rabbi, imam, or other religious professional about their sexuality or gender or direct their children to do so, that is their decision, but those services should be clearly labeled as such and not provided under the guise of licensed medicine. The article referenced above can be found at [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(15\)60737-1/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(15)60737-1/fulltext)

3/19/19 7:20 pm

**Commenter:** Finley

### **Never use conversion therapy**

conversion therapy should NEVER be used for LGBTQ+ youth. Instead, we should work on making society more accepting of people regardless of their gender of sexuality. Using conversion therapy teaches youth that it is wrong to embrace who they are, and it aggressively forces them into how other people think they should be. It is not the youth that need to change; society needs to change in order to understand that nothing is wrong with being yourself.

**Commenter:** Elissa Hamon

3/19/19 7:23 pm

### **NO CONVERSION THERAPY**

RED ALERT: The pro-conversion therapy crowd is overloading a comment period in Virginia working to protect LGBTQ youth from conversion therapy. I need all hands on deck.

Do you live in Virginia? Do you know someone who lives in Virginia? Do you know someone who knows someone who lives in Virginia? Comment below and let me know.

Go Here: [tinyurl.com/Trvor1](http://tinyurl.com/Trvor1) and submit a comment.

Mental Health Note: Don't read the bad comments. You don't need that negativity in your life. You are amazing and are saving lives.

#### General Talking Points

? This guidance will protect youth from so-called "conversion therapy," a dangerous and discredited practice aimed at changing their sexual orientation or gender identity.

? These dangerous and discredited practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis.

? This guidance protects young people from state-licensed therapists in Virginia who falsely claim to parents and youth that being LGBTQ is a mental illness, and therefore taking advantage of parents and harming vulnerable youth.

? These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are.

? These practices are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts.

? No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people.

? We can't allow one more young person to be targeted and hurt by these dangerous and discredited practices.

Harming LGBTQ youth through conversion therapy should NOT be a legitimate therapeutic practice.

**Commenter:** Finley R.

3/19/19 7:27 pm

### **Take it From the Youth: We Love Who We Are (And You Should Too)**

Conversion Therapy should NEVER be used for LGBTQ+ youth. Instead, we should aim to make society more accepting of people regardless of their gender or sexuality. Using conversion therapy teaches youth that it is "wrong" to embrace who they are, and it aggressively twists them into society's ideal image of a person. It is not the youth that needs to change; society needs to change in order to accept and love those who are different from people's usual expectations.

**Commenter:** Ewen Crunkhorn

3/19/19 7:47 pm

**In support of a ban on conversion therapy.**

Conversion therapy is a widely discredited practice that falsely alleges being LGBT is a mental illness. It tries to use shame, fear, and often psychological/physical torment to "cure" a person. The practices used often fall under widely accepted definitions of torture. People who survive this torture are at higher risks of depression, self-harm, and suicide. As such, I am, and the Virginia legislature should be, in full support of this ban on state-licensed therapists practicing or performing conversion therapy, especially on minors.

**Commenter:** Daniel N Brewer

3/19/19 7:47 pm

**Conversion therapy is sanctioned abuse**

These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are. Abuse is not a weapon to wield against children. Much less is it a weapon to be wielded for dangerous and discredited practices based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis.

Mental health professionals must provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people. Conversion therapy is not therapy, it is abuse that causes inestimable permanent harm.

**Commenter:** Linda

3/19/19 7:50 pm

**Patient comes first for conversion therapy**

In most any other medical profession or counseling situation, the patient's needs drive the plan of care. Whatever plan the patient comes up with with their professional should respect the patient's wishes and not the whims of the current society. This goes both ways. It is tyrannical for the government to step in here. No professional should face legal charges for being an advocate for their patient. Let's not use our youth for our own preferences.

**Commenter:** Elizabeth Florek

3/19/19 7:54 pm

**Support evidence-based practice and ban conversion therapy**

Licensed therapists in Virginia should not be using an inaccurate, outdated 'conversion' model for lgbtq patients.

**Commenter:** Susan Layman, Resident of Chesterfield County, Virginia

3/19/19 8:04 pm

**Comment AGAINST Gay Conversion “Therapy”**

There is absolutely no scientific basis for this dangerous practice. It is rooted in brainwashing and amounts to nothing more than torture. This practice greatly increases the likelihood that a young person will commit suicide. It is rooted in hatred and fear—neither of which are in accordance with Christian values. It must be outlawed to protect young people from irreparable harm by people who should not be allowed to provide ANY kind of psychological or counseling services. These frauds are a danger to our communities.

**Commenter:** Michaela Barnett

3/19/19 8:11 pm

**Conversion therapy harms vulnerable members of our society**

Conversion therapy is not only outdated, it is dangerous and should be illegal. I support a ban on conversion therapy so that health care providers will “do no harm.”

**Commenter:** Margaret Christle

3/19/19 8:11 pm

**Support for the Ban on Conversion Therapy**

I am in complete support of the guidance banning the use of conversion therapy which is a dangerous and discredited practice based on the false claim that being LGBTQ+ is a mental illness that needs to be cured. Conversion therapy is an incredibly harmful practice that has no credible evidence to back its use. It uses rejection, shame, and psychological abuse force our young people to change who they are. These practices have devastating results that can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts. No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for LGBTQ+ young people. It is unconscionable that another person be targeted and hurt by these dangerous and discredited practices.

**Commenter:** Kaden

3/19/19 8:17 pm

**Conversion Therapy Should Be Banned**

Conversion therapy is not even needed. Why change someone's sexuality? Its not harmful to be gay, bi, ace, or any other sexual orientation. And because of that, it is harmful to subject someone to conversion therapy because it teaches them otherwise, that they should be ashamed that they are not heterosexual.

**Commenter:** Jim Best, Floyd PFLAG

3/19/19 8:20 pm

**no license for fraud**

The premise for conversion therapy is based on wishful thinking and the completely unsubstantiated assumption that sexual orientation and gender identity is a choice. Professionals licensed by a state board cannot justify intervention based on religious beliefs or to reinforce a

client's "desire to change." Freedom of religion has nothing to do with ethical evidence-based professional practice. Requiring treatment based on evidence-based practice is not censorship. All major national professional organizations who serve youth reinforce this abundantly clear position. All of the national once popular conversion therapy organizations have apologized and closed their doors or been sued out of business. For any therapist to claim that they can reverse sexual orientation or gender identity is blatant fraud. Continuing to support such therapists will entangle licensure agencies in this abuse.

**Commenter:** Cody Afionis, Lost Chains Jewelry

3/19/19 8:22 pm

### **Ban Queer Torture Masquerading As Therapy**

We need to protect all queer youth from this inhumane practice that aims to change their sexual orientation and/or gender identity through harmful practices that amount to psychological abuse. These discredited practices are based on the idea that Lesbian, Gay, Bisexual, Transgender, Queer, or Intersex (LGBTQI) peoples need to be cured with no scientific basis and causes permanent mental illness. These practices are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts.

No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people. We can't allow one more young person to be targeted and hurt by these dangerous and discredited practices.

Conversion therapy is not a legitimate therapeutic practice. By protecting people who use it, you are protecting child abusers. End this disgusting practice once and for all.

**Commenter:** Angela Cox

3/19/19 8:27 pm

### **Conversion therapy is dangerous**

Homosexuality is no longer regarded as the mental illness that conversion therapy pretends that it is. It is a dangerous practice that employs shame and psychological abuse to get a child to "change their mind" about being homosexual. This shame and abuse has led to suicides in the past. For all of those reasons it is no longer considered a valid practice by the larger psychiatric community. Please don't allow Virginia's children to continue being subjected to conversion therapy.

**Commenter:** Rev. Marty Anderson

3/19/19 8:31 pm

### **Conversion Therapy is Dangerous**

As a pastor with a degree in counseling, I often provide pastoral care to those who are spiritually wounded. I have counseled people struggling to recover from the damage done to them through conversion therapy. It is not uncommon for those who experienced conversion therapy to not trust their church, their pastors, or the love of their God. Some people never heal from this trauma. Please protect minors from having this dangerous, unscientific practice forced upon them.

**Commenter:** Carmen osborne

3/19/19 8:31 pm

### **Outdated solution for something that isn't even a problem**



There is no reason for this barbaric practice to continue. Homosexuality and trans are not mental illnesses that need to be recovered from. The fact that anyone would lobby FOR it is appalling.

**Commenter:** Peter, David Christle Incorporated

3/19/19 8:33 pm

### **Conversion Therapy**

Conversion therapy is stupid and really messed up. It's not like gay people can control who they're attracted to. It doesn't work but more importantly there's nothing wrong with same-sex attraction, so there is a fundamental flaw in conversion therapy's purpose/reason for existing. Condemn!

**Commenter:** Daniel Strauch

3/19/19 8:34 pm

### **No to conversion therapy**

Conversion therapy is not humane, and encourages hate against an already growing homophobic environment

**Commenter:** Janice Collins

3/19/19 8:35 pm

### **Shut down Conversion therapy**

Why is there even a question about conversion therapy these days. Not that many years ago people were given shock treatments for God only knows what. Conversion therapy is just as bad. It is bad science and it is harmful. One has to question the motives of anyone who would allow this to happen to a person they say they love. Stop this inhuman practice.

**Commenter:** Brandon DeLorenzo

3/19/19 8:36 pm

### **Who really thought this was a good idea?**

Conversion therapy has absolutely no place in this day and age. Being Gay/Bi/Pan, etc is NOT a choice and the people who believe it is need to wake up and smell the roses. Love is love it's as simple as that, who really buys into the idea that you can be programmed to think and act a certain way? There is nothing anyone can say or do that will change how someone is wired and forcing people to go through these horrific "therapies" can have long standing ramifications on their mental health. Let's be the generation that brings forth this new age and acceptance and love and ban these old fashioned and backwards ways of thinking and practices.

**Commenter:** Lucas Raymond

3/19/19 8:42 pm

### **Ban conversion therapy**

Conversion therapy is a pseudoscience that only uses shame and fear to try and "change" people, and tells them that who they are isn't good enough. It is outdated, not backed by any research, and something that needs to be left in the past. LGBTQ+ individuals can't and shouldn't change themselves, plain and simple.

**Commenter:** Tray Dunkerson

3/19/19 8:42 pm

### **Conversion therapy is immoral**

No one should be subject to the torture of being told who you are as a person is wrong. Let people be who they are. Unless you are a terrible person and trying to inflict your person religious beliefs on people. Then don't be that person.

**Commenter:** Rebekah Kusterbeck

3/19/19 8:48 pm

### **Say 'No' to Conversion Therapy**

This practice has been proven to harm LGBTQ youth by shaming them and causing mental anguish just because of who they are. That is cruel. It is wonder there is such a high suicide rate among LGBTQ youth who are forced into this.

**Commenter:** Jiyeon Fulmer

3/19/19 8:49 pm

### **Ban Conversion Therapy**

Stop persecuting people for who they are. So called conversion therapy has been discredited by mental health professionals and deemed extremely dangerous for their physical and mental health. I am very much concerned, especially for minors who has no way out of this. Ban it. It shouldn't even be called therapy. There's no science behind it. It is just forcing blind religious doctrine.

**Commenter:** Dylan Fulmer

3/19/19 8:50 pm

### **Ban Conversion Therapy**

Conversion therapy is both a horrible name and an even more horrible idea. Please let's ensure that people can't legally do this.

**Commenter:** Amu

3/19/19 8:51 pm

### **Allow counselors and patients to choose**

Patients and their counselors should be allowed the freedom to choose whatever therapy they wish. Despite the outcry of some people, patients should be able to choose whatever path they wish.

**Commenter:** David Christle, Student at the University of Virginia

3/19/19 8:53 pm

### **Conversion Therapy is Abuse and a Manifestation of Hate**

Conversion therapy is abuse. It is fueled by the false assumption that sexual orientation or gender identity is something that can be changed, and attempts to make that change through the emotional and mental manipulation and degradation. It tells the vulnerable queer person that there is something inherently wrong with who they are and that the only way they can "fix" themselves is through an outright rejection of their natural feelings and desire, which is achieved only by

**teaching LGBTQ+ people to hate themselves.** Not only does conversion therapy continue to support the narrative that sexual orienatation or gender identity is a choice, it also has damaging psychological effects on its individual patients that lead to depression, anxiety, self-harm, and suicide. **Any organization or institution that supports conversion therapy, even implicitly, has blood on its hands.** Conversion therapy is nothing more than a systematic and purposeful mainfestation of hate, and it is an absolute disgrace to the Commonwealth that it continues to be allowed. In order to ensure safety of the most vulnerable members of our communities and promote the recognition of the incredibly diversity and contributions LGBTQ+ people bring to our Commonwealth, it needs to be condemned. The mental health of the most vulnerable of our society is at stake. Our concious is at stake. Young and innocent lives are at stake. Any individual on this board who does not vote to condemn will have to live with the consequences of knowing that they have ruined, and perhaps ended, an untold amount of beautiful, sacred lives.

**Commenter:** Audrey Watson, UVA

3/19/19 8:55 pm

### **Ban Conversion Therapy**

This is an appalling practice that does harm to its victims. Psychological trauma is common amongst survivors of conversion therapy, and it should not be legitimized or recognized in any way.

**Commenter:** K Jacobs, PhD

3/19/19 9:02 pm

### **Conversion therapy is quackery**

The idea that banning conversion therapy has anything to do with freedom of speech or religion is a specious argument. What this is about is licensed practioners being properly regulated by their board. Conversion therapy is harmful and widely recognized as quackery. Your board certified physician is not allowed to practice voodoo and licensed counselors should not be allowed to engage in the quackery of conversion therapy.

**Commenter:** Amanda Kelly

3/19/19 9:03 pm

### **Ban conversion therapy**

Conversion therapy is a cruel pseudo science which attempts to impose one's moral views on another person. Literally telling one human being that who they are is not good enough. Any parent who seeks this torture should be investigated by CPS.

**Commenter:** Chase Gohlke

3/19/19 9:06 pm

### **Not cool bro**

Why is this even a thing that people are divided on. If someone is born with an extra toe it's biologically in there DNA that they have a extra toe. If someone is born with a homosexual mindset it is in there DNA and genes that's thats who they are. So this argument that it is against biology lacks a basic understanding of biology in its simplest form. It is also proven that this sort of therapy is often dangerous and adds more confusion then understanding and ultimately doesn't work. So how about you guys do something about getting me a better education in English and grammar instead of bringing up non logical things like this.

**Commenter:** Mary Gruber

3/19/19 9:06 pm

**Ban Conversion Therapy**

This type of psuedo-therapy is is harmful to anyone who is subjected to it. It is psychological abuse. No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people. Please do not permit this non-scientific practice. Protect all humans from emotional abuse and self-hatred.

**Commenter:** Dean B.

3/19/19 9:06 pm

**Ban Conversion Therapy**

I am a bisexual man, and I have been in a loving relationship with my husband for over 10 years. I have always been bisexual, and thanks to the love and support of my husband, friends, and family, I've always been encouraged to be who I am. I've had the love and support needed to help me grow, learn, earn a Masters in Aerospace Engineering and become a healthy and successful adult.

The thought of a young person being told that who they love is wrong and to be coerced into undergoing a discredited practice sickens me. Sexual identity is not an illness and it is not something to be cured -- there is no scientific basis for it. To allow a child to be subjected to "conversion therapy" is denying them a happy and healthy life -- it uses rejection, shame, and psychological abuse to change who they are and increases the risk of depression, substance abuse, and suicide.

Please ban conversion therapy. Who you are and who you love is not an illness.

**Commenter:** Neelanshi Saxena, UVA student

3/19/19 9:07 pm

**Conversion Therapy**

condemning conversion therapy is okay.

**Commenter:** Bay Brooks

3/19/19 9:07 pm

**Ban Conversion Therapy**

Conversion therapy is psychological detrimental and in no way benefits anyone. It should not be legitimized or supported in any way. I have no idea how this is even a debate. Conversion therapy is wrong. Period.

**Commenter:** Christopher Booth

3/19/19 9:11 pm

**Keep religion out of medicine. Conversion Therapy is sanctioned abuse.**

Tell me what God, who so creates their child in their image, wants that child tortured for being the way God created them?

Freedom of religion is important, but in no way does spiritual practice contribute to medicinal science. Conversion therapy is a way to abuse children under the guise of "helping" them. I am asking my state to prevent practices in which children could be subjected to torture all under the guise of "curing" a mental illness. Being gay is not a mental illness. Being trans is not a mental illness. There is no scientific evidence supporting that being a member of the LGBT+ community is somehow a condition that needs to be solved.

Support counseling. Support school clubs and guidance counselors. Do not allow practitioners of fairy tales to torture children.

**Commenter:** Scott Clark

3/19/19 9:11 pm

### **Prohibit "Conversion Therapy"**

"Conversion therapy" is not therapy, but abuse and torment. Any practitioner attempting to force an orientation change on a person, especially a minor, as part of a mental-health practice should be sanctioned severely. Medical practice much not be mis-used as an opportunity to inflict social or political policies on a patient to the patient's harm.

**Commenter:** M. J. Roberts

3/19/19 9:12 pm

### **Ban conversion therapy**

Please never let Virginians live under the black cloud of this type of therapy. It is dangerous and not scientifically responsible.

**Commenter:** Karen Barr

3/19/19 9:14 pm

### **Ban Conversion therapy**

Please ban any type of conversion therapy for LGBT youth. This type of treatment has been established to be harmful to our youth. Being lesbian, gay, bisexual or transgender is not a mental illness. Treating people as if it causes real damage, no matter what the motivation of said treatment. Our youth deserve our protection.

**Commenter:** Josh C

3/19/19 9:20 pm

### **"Conversion Therapy" isn't Therapy**

To start with, Psychology is a science based field and conversion therapy has no basis in science. We don't have doctors out there prescribing essential oils, but even if we did this still would be better than conversion therapy. Why? Because conversion therapy actively does harm. It's shown to increase depression and suicide rates. It causes an increase in self harm rather than preventing self harm. Therapy is meant to heal and to help heal, and nothing in having a sexual orientation that other people don't like requires healing. People are who they are and trying to force change upon them by trying to convert them rather than helping them come to terms with who they are is harmful not helpful.

**Commenter:** Dara Davis

3/19/19 9:20 pm

### **BAN CONVERSION THERAPY**

IT IS INHUMANE AND TREATS OTHER PEOPLE AS SUB-HUMAN FOR BEING THEMSELVES.  
BAN IT. BAN IT. BAN IT!!!!!!

**Commenter:** Alyssa Freeman

3/19/19 9:22 pm

### **Conversion Therapy**

Conversion therapy has been proven to be not only ineffective at changing people's seexual orientation, but also psychologically dangerous. Being gay is not a mental disorder that can be cured with any sort of therapy. Conversion therapy is practice pushed by religious extremists who try to use the Bible to make law. This country has seperation of church and state. The Bible should not be used as a law book or influence the government in any way. This is a harmful practice!!

**Commenter:** Ellie Mackintosh

3/19/19 9:32 pm

### **Conversion therapy**

Conversion therapy should be outlawed! We have better protections against animal abuses, while we let legislators decide on LGBTQ. The UK has banned the dangerous conversion therapy practice. Public education is our most powerful tool for breaking through this wall of life-destroying suffering and abuse. That's why Theresa May's vocal support is so powerful, and that's why we need more public officials and public figures here in the U.S. and elsewhere pledging the same. When society becomes more accepting, elected officials feel more empowered to introduce bills to protect our community. It's that simple.

**Commenter:** Broome W

3/19/19 9:33 pm

### **In no way shape or form is conversion therapy acceptable.**

Wemust progress,as a society, standing still or regressing is not an option. And conversion therapy is about 10 steps backwards. Especially in as densely populated area we should be leaders of how health and wellness can bring an incredible light to our livelihoods. To the strength of our community we must build each other up and not tear down humans with incredible potential to enrich our futures by being exactly who they are. There isn't enough terrible things to say about BS tactics used to shame people and children. Look at the damage one messed up person caused with pretending like vaccines caused autism. We mustn't fall prey to the charades and mental warfare. We are an incredibly hard working part of the country , let's stamp out the evil and hateful ways people continue to push as they are afraid of change. Let's be the light for forward movement. And let's watch our area thrive as a result.

**Commenter:** Shoshana Kronfeld

3/19/19 9:35 pm

### **Conversion Therapy is Harmful**

Conversion therapy needs to be prohibited. There is no scientific backing for it and psychology is supposed to be scientific. Beyond that, Conversion Therapy has been proven harmful and even people who used to do it have come out against it. Protech the children!!!

**Commenter:** Sydne Santo

3/19/19 9:35 pm

### **Conversion Therapy: No Thank You**

I'm truly confused as to who thought this was ever a good idea. Conversion therapy is a form of abuse, and anyone who thinks otherwise is hiding behind the idea that people in this world exist with varying degrees of differences in their lifestyles and sexual orientations.

Suicide already is the second leading cause of death among young people ages 10-24, and those in the LGBT+ community are almost **three times as likely to commit suicide**. THREE TIMES!! By allowing conversion therapy to continue to be legal and practiced, you are enabling the mental and emotional abuse of countless number of people who otherwise are not exposed to the idea that they are loved, accepted, and valued. The world is hard enough without us placing additional darkness on those who need love the most.

**Commenter:** Jay Watkins

3/19/19 9:39 pm

### **Ban conversion "therapy"**

I grew up in a religion that shamed me for my sexuality. It's taken years to undue the trauma inflicted on me. Luckily my parents came to their senses before starting me on this kind of therapy. This kind of therapy is harmful and the youth of our state deserve love and a safe environment in which to flourish.

**Commenter:** Kelsey Altizer, Virginia Tech

3/19/19 9:43 pm

### **Support for Conversion Therapy Ban**

Conversion therapy is NOT a valid form of therapy. People who identify on the LGBTQ+ spectrum were born the way that they are. They can try and hide or mask over their sexual orientation, but over time, this becomes traumatizing for the individuals. Please ban conversion therapy to abide by the counseling principle of "doing no harm" to our clients because when someone practices conversion therapy, they are absolutely causing harm to that individual.

**Commenter:** Wayne Barr

3/19/19 9:45 pm

### **Ban Conversion therapy**

We have a responsibility to protect our youth from harm that would be caused by allowing anyone to practice or offer conversion therapy claiming to be able to change one's gender or identity especially by counselors pastors medical or psychological practitioners. Please do not allow such so-called therapies to be offered or done in the commonwealth.

**Commenter:** Jim Davis, NTT Data

3/19/19 9:46 pm

### **Conversion therapy should be banned.**

Conversion therapy is tantamount to brainwashing. Please take steps to see that it is no longer practiced in VA.

**Commenter:** Lee Henkel

3/19/19 9:54 pm

**Guidance Document is Appropriate**

This document seems entirely appropriate. The research to date is quite compelling that sexual orientation is not subject to change, thus is both unrealistic and potentially harmful to try to do so. I support the Board of Psychology issuing this guidance document.

**Commenter:** Amy Cunningham, Prince William County

3/19/19 9:54 pm

**VA must Ban Conversion Therapy**

It is a horrific failure of a practice, ESPECIALLY by a licensed psychologist, to try to forcibly convert someone's gender or sexual orientation. It should be ruled illegal and criminal. As an involved PWC resident, I expect my state to do the right thing and ban the terrible practice of conversion therapy thereby making it illegal and criminal to perform.

**Commenter:** Julia Holcomb

3/19/19 9:55 pm

**Conversion therapy is unacceptable**

So-called conversion therapy is never acceptable. It assumes that being gay is a mental illness, which is no longer accepted as medical fact; it assumes that it is possible, and medically indicated, to alter a person's sexuality by unproven and potentially dangerous methods. Conversion therapy ( which is not therapy at all) is particularly damaging and dangerous if it is practiced on young people whose ego-strength is not fully-developed.

Conversion therapy should not be legal. It is both ineffective and harmful.

**Commenter:** Sydney P

3/19/19 9:55 pm

**BAN CONVERSION THERAPY!**

Separate church and state. The government does not have the right to impose their individual beliefs onto the citizens.

**Commenter:** Jonathan Clough

3/19/19 10:05 pm

**A therapy ban is wrong, dangerous, and unconstitutional - protect counselors and patients**

I implore you NOT to advance administrative rules that would attempt to end-run the legislative process and achieve a so-called "conversion therapy" ban that was defeated legislatively already during the 2018 session.



Such a ban is wrong, dangerous and unconstitutional. It is wrong because it is a blatant assault on free speech and the truthful acknowledgement and recognition of biological and genetic reality. It is dangerous because it denies patients access to facts, tools, resources, and assistance to reconcile their feelings with their biology and avoid the often self-destructive paths that gender dysphoria often takes. Finally, it is unconstitutional because there is no statute authorizing such policy or rulemaking, and if there were such a statute, it would run afoul of the Virginia constitution.

**Commenter:** Joshua Branch

3/19/19 10:10 pm

**Conversion therapy has no place in society.**

No one should ever be told the person they feel they are is wrong or bad. Conversion therapy is a horrible misguided practice that should be banned.

**Commenter:** Beth H. Carter

3/19/19 10:10 pm

**Ban conversion therapy**

My son became extremely depressed after conversion therapy. It is so critical that this practice be banned. Please don't hesitate to end this hypocrisy and listen to your heart and soul. Type over this text and enter your comments here.

**Commenter:** Jonah Haefner

3/19/19 10:14 pm

**Ban Conversion Therapy**

LGBTQ is not a mental illness. These children and teens need protection from the abuse allowed "medically" by their parents through conversion therapy. I support the Board of Psychology issuing this guidance document.

**Commenter:** Tanner Mobley

3/19/19 10:14 pm

**Ban Conversion Therapy Virginia**

Every major psychological association in the United States has come out and said that conversion therapy is not only ineffective but it is known to cause harm. We must protect kids from these dangerous practices.

**Commenter:** Sophia McNicholas

3/19/19 10:22 pm

**LGBTQ Youth Need to be Protected from Conversion "Therapy"**

Thankfully, I have supportive parents, so I have no direct experience with conversion therapy. Not everyone is that lucky. Being told by a physician, someone who you are supposed to be able to trust, tell you time and again that you are broken, that there is something wrong with you when there isn't, is inhumane. This practice dramatically increases the likelihood that a child will attempt suicide. Freedom of Religion does not mean that one has the freedom to torture children.

**Commenter:** Alex Wallace

3/19/19 10:31 pm.

### **Ban Conversion Therapy**

Conversion therapy is based on the principle that being LGBTQ+ is a disease and/or fixable, which it is not. Instead of forcing a dangerous practice that has no scientific basis on the community, provide resources and community support to help individuals in the LGBTQ+ succeed and feel safe. Provide resources for families, friends, schools, employers, places of religious practice, etc. educational tools to better understand the community, not change or "convert" it.

**Commenter:** Amanda Golino

3/19/19 10:36 pm.

### **Ban Conversion Therapy**

I am writing to ask that Virginia ban conversion therapy. There is no place in America for this barbaric practice. Medicine must follow evidence based practice, and there evidence shows us this is ineffective and harmful.

**Commenter:** Elizabeth Fogarty

3/19/19 10:36 pm

### **Protect minors from conversion therapy practices**

First, do no harm. So-called "conversion therapy" violates this most basic tenet. I encourage you to support Guidance Document 125-9 and protect LGBTQ+ youth under 18 from this harm.

**Commenter:** Alexandra Valliere

3/19/19 10:37 pm

### **Banning Conversion Therapy Saves Lives**

Conversion therapy is a dangerous practice that has been widely discredited. The discredited practices of conversion therapy are based on the entirely false claim that being lesbian, gay, bisexual, transgender, or queer is a mental illness that must be cured. There is no scientific basis for these claims and they are false. Sexual and gender identity is not a mental illness, no matter who a person is. Conversion therapy is harmful. Conversion therapy uses rejection, shame, and psychological abuse to force young people to attempt to change who they are and these practices are known to be extremely dangerous as they can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts which often are successful suicides. State-licensed therapists in Virginia are falsely claiming to parents that their children are suffering from a mental illness and are using those claims to place young people in conversion therapy. No mental health professional, whose job it should be to care for a young person should they need help for an actual problem, should be able to manipulate parents toward a practice that can and very possibly will cause the damage a parent wishes to avoid. This guidance protects young people from therapists such as these. There have been too many deaths and too many families and lives torn apart from the effects of conversion therapy. We can't allow one more young person to be targeted by these dangerous and discredited practices.

**Commenter:** Claire Fogarty

3/19/19 10:42 pm

### **Conversion therapy is antithetical to the values of our Commonwealth**

Conversion therapy is a dangerous and discredited practice. According to the American Psychiatric Association, "the potential risks of reparative therapy are great, including depression, anxiety and self-destructive behavior, since therapist alignment with societal prejudices against homosexuality may reinforce self-hatred already experienced by the patient." The Pan American Health Organization says that conversion therapy "lack[s] medical justification and represent[s] a serious threat to the health and well-being of affected people." Conversion therapy causes significant harm to vulnerable youth and it is antithetical to the values of our great Commonwealth.

**Commenter:** Adam Trimmer, Born Perfect

3/19/19 10:44 pm

### **Twofold Support of this Document**

To the Virginia Board of Psychology:

I support this guidance document as both an individual and as part of an organization.

As an individual, I have some really painful memories from my time as an ex-gay. An ex-gay is an individual who, instead of identifying as gay, identifies as struggling with same-sex attraction, believing that one can heal from homosexuality. These attractions did not go away, but my enjoyment of life and self-confidence did. Instead of learning to love myself, I only learned to resent my parents as I was taught that my mother was overbearing and that my father was emotionally absent. This was taught to me as a "root cause" of me "developing same-sex attractions." As someone who was personally impacted by efforts to "heal from homosexuality," also known as sexual orientation change efforts (SOCE), or conversion therapy, I express a heartfelt thank you for defining it for what it is.

I also support this document on behalf of Born Perfect as Virginia's Born Perfect Ambassador. Born Perfect was created in 2014 by the National Center for Lesbian Rights to end conversion therapy. Few practices hurt LGBT youth more than attempts to change their sexual orientation or gender identity through conversion therapy, which can cause depression, substance abuse, and even suicide. But some mental health providers continue to subject young LGBT people to these practices—also known as "reparative therapy," "ex-gay therapy," or "sexual orientation change efforts"—even though they have been condemned by every major medical and mental health organization in the country. This guidance document is a fantastic step in the right direction.

**Commenter:** Lori Rose-Thompson

3/19/19 10:53 pm

### **Ban conversion therapy**

Conversion therapy is outdated and based on the false premise that being LGBTQIA is a mental illness. The mental health field has stated clearly that being LGBTQIA is not a mental illness and does not require "treatment" as such. Conversion therapy has been shown to be damaging to those who participate-- or are forced to participate. Ban this unscientific, unnecessary practice in Virginia.

**Commenter:** Kris Consaul

3/19/19 10:54 pm

### **Protect out LGBTQ Community**

- ? This guidance will protect youth from so-called “conversion therapy,” a dangerous and discredited practice aimed at changing their sexual orientation or gender identity.
- ? These dangerous and discredited practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis.
- ? This guidance protects young people from state-licensed therapists in Virginia who falsely claim to parents and youth that being LGBTQ is a mental illness, and therefore taking advantage of parents and harming vulnerable youth.
- ? These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are.
- ? These practices are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts.
- ? No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people.
- ? We can’t allow one more young person to be targeted and hurt by these dangerous and discredited practices.

**Commenter:** Ayana Obika, Richmond Business Alliance

3/19/19 10:55 pm

### **The Richmond Business Alliance Supports A Ban on Conversion Therapy**

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On behalf of the Richmond Business Alliance, the LGBTQ Chamber of Commerce. I write in support of Guidance Document 125-9, which would protect youth under the age of 18 from so-called “conversion therapy” in Virginia psychological practice. Being LGBTQ+ is not a psychological disorder that needs to be “converted” or “changed.” This practice sends a message that there is something wrong with who LGBTQ+ youth are and that they need to be “fixed.”

As a person of color when I think about this practice, I am reminded of the inhuman “medical treatments” that were inflicted upon people of color with no regard for their personhood or the physical or emotional damage that those treatments caused. We cannot continue to be a society that allows any type of pseudo-science practices to be inflicted upon those who should be loved, respected and honored with the right to live as they are created.

To paraphrase, “Our children come through us...they do not belong to us”

Please ban this disgraceful practice.

**Commenter:** Fernando

3/19/19 10:56 pm

### **Conversion therapy is dangerous, ineffective, and should be banned**

Conversion therapy has been proven to be extremely ineffective and dangerous, often resulting in LGBT youth hurting themselves. Every smart, responsible legislation should realize the negative impact such programs have over susceptible population, and put a stop to this atrocious practice.

**Commenter:** Annie

3/19/19 11:09 pm

**ban conversion therapy**

Conversion therapy should be banned. We should not be allowing people to punish themselves or their children over their sexuality. It is unethical and inhumane and it is our responsibility as a society to move in the direction of acceptance and kindness.

**Commenter:** Vanessa Teixeira, EdD, LMHC

3/19/19 11:16 pm

**Support for conversion therapy ban**

It is completely unethical and extremely harmful for counselors to practice conversion therapy with clients. It goes against everything we stand for as mental health clinicians.

**Commenter:** Compass Points Counseling LLC

3/19/19 11:17 pm

**Conversion therapy useless and harmful**

Having personally endured years of conversion therapy and an exorcism, I can tell you first hand it is not of God, useless and suicidally harmful to anyone inflicted with this anti APA recommended therapy. As a psychotherapist licensed in PA and MD, this therapy modality is harmful and should be banned from being used. I would be happy to come and testify to it's useless and harmful effects on humans. Forbid this therapy from being practiced in Virginia. It should be a federal hate crime.

**Commenter:** Ron Yahil

3/19/19 11:21 pm

**conversion therapy kills people**

There should not even be any debate about this. Conversion therapy is a dangerous practice that causes LGBTQ people to harm themselves, even to the point of suicide. There is no legitimate therapeutic use for it. Suggesting that there could be any legitimate usage of conversion therapy makes as little sense as suggesting that there is a legitimate medical use for cigarettes. There is simply no medical evidence to support it. In fact, all available evidence points to the opposite.

**Commenter:** Chere Vincent

3/19/19 11:24 pm

**All People Should Be Protected From Conversion Therapy**

Any "treatment" that results in 50% or more of the people treated committing suicide is not a treatment. Conversion therapy is emotional abuse combined with physical abuse designed to make the patient hate their sexual orientation and themselves. It is a blatant abuse of the Hippocratic Oath and criminal prosecution should be filed against the practitioners of this horrid and demoralizing concept.

3/19/19 11:30 pm

**Commenter:** Monica

**Ban conversion therapy!**

I urge you to please put a stop to conversion therapy in Virginia.

Our young people do not need this type of child abuse.

Thank you.

**Commenter:** John Harrichand, Assistant Professor of Counselor Education

3/19/19 11:40 pm

**Supporting VA Conversion Therapy Ban**

I, John Harrichand, Ph.D., LPC(VA), NCC, CCC would like to inform members of the VA legislature of my support for the Conversion Therapy Ban. As a mental health professional, I have witnessed the effects of Conversion Therapy on the college students I worked with during my time in Virginia. Conversion Therapy leaves its victims in a state of confusion, and inflicts emotional pain that results in anger and sadness being turned inwards further harming the individual who experiences the effects of Conversion Therapy. I strongly believe that ban will provide the needed resources for members of the public who are unable to stand up for their rights and provide them the support to live authentically. I also believe that the ban will result in bringing mental health professionals who practice this harmful version of "therapy" to justice.

Kindly let me know if you need further support of the Conversion Therapy ban and I will be happy to provide it.

Warm regards,

Dr. Harrichand

**Commenter:** Patricia Boland, EdS Retired School Psychologist

3/20/19 12:07 am

**Support of Conversion "Therapy" Ban**

The overwhelming research and the DSM does not support the efficacy of conversion therapy. State licensed mental health providers offering this harmful approach should be reported to the state board for unprofessional behavior.

**Commenter:** Amanda

3/20/19 12:27 am

**Ban conversion therapy**

Conversion therapy is wrong and harmful. There is no evidence that it is effective and has been found to be incredibly harmful. There is no legitimate medical or psychiatric organization/association that promotes conversion therapy and all have vocally come out in recommending banning it. Conversion therapy goes against best medical practices and is not a legitimate therapeutic exercise. If conversion therapy is not banned then it is just state sponsored torture of lgbt youth.

**Commenter:** Cheryl Johnson

3/20/19 12:51 am

**Conversion therapy**

Every effort should be made to council, inform and educate before mutilating people's bodies. 10 years ago boys and girls had no problems accepting their bodies. Why now is their so much confusion? Stop this insanity of telling children abnormal is ok.

**Commenter:** Tara Moscopulos

3/20/19 1:44 am

**Ban conversion therapy**

Conversion therapy has no place in science, medicine, or in social justice. Protect LGBTQIA youth and Van it's oratrice in the commonwealth immediately

**Commenter:** Theresa Rittmann,

3/20/19 5:25 am

**Ban conversion therapy**

Homosexuality was removed from the DSM as a mental illness in the 1970's, why would it still be legal to practice therapy that ignores this fact? Conversion therapy has long and short term negative effects on participants overall feelings of self-worth, is ineffective in its purposes purpose and increases the likelihood of suicidal ideation. Ban this harmful practice now!

**Commenter:** Stephanie Seely

3/20/19 5:44 am

**wrongheaded ban on "conversion therapy"**

This "ban" is is an attack on children and those who would try to help them. It violates free speech, religious liberty, and endangers children who should be able to receive helpful and godly counsel to avoid dangerous behaviors and to address the underlying issues likely contributing to certain feelings. This legislation died in subcommittee back in February, rejected by the people, and that's where it should stay.

**Commenter:** Christy Cundiff, LPC, Roanoke County Schools

3/20/19 6:11 am

**Supprt for Ban of conversion therapy**

My job is to empower and support high school students by providing counseling services In the school setting. I have been counseling children for 18 years. Conversion therapy hurts our most vulnerable children and needs to be banned in order to help protect these children. The APA supports this stance and so does almost 100 different studies. You can save a child's life by banning conversion therapy in Virginia. All children need to be loved and accepted for who they are and not what someone else thinks they should be. Thank you so much!

**Commenter:** Darren Di Battista

3/20/19 6:15 am

**Conversion Therapy has no place in civilization**

1) Being gay isn't wrong. 2) No credible, knowledgeable person thinks it works. 3) Religious fundamentalism is the only excuse for enabling a "therapy" so thoroughly debunked and proven to harm. It has no place in an advanced civilization.

**Commenter:** Cheralyn Potts

3/20/19 6:24 am

**Conversion Therapy is detrimental to society**

Conversion therapy causes depression and suicide.

**Commenter:** Amanda Farnum

3/20/19 6:27 am

**Conversion therapy is dangerous and discredited.**

Conversion therapy is dangerous and has been discredited. LGBTQ youth need love and support and access to legitimate mental health services. It would be heart breaking for our state to take a step backwards on this issue. Doing so would turn our backs on science and these children.

**Commenter:** Stair Calhoun, Network NoVA

3/20/19 6:51 am

**Conversion Therapy is Immoral**

The government should not get into the business of making decisions for what people want to do in their bedrooms

**Commenter:** Chris

3/20/19 6:54 am

**Conversion therapy is abuse**

Whether or not you believe that being LGBTQ is morally right, it is beyond clear that psychological torture is morally wrong, and doing it in the name of love for a vulnerable young person and their "best interest" is abuse. This inhumane practice should be banned.

**Commenter:** Carol Schall, VIRGINIA COMMONWEALTH UNIVERSITY  
AUTISM CENTER FOR EXCELLENCE

3/20/19 7:01 am

**Ban all conversion therapy**

Conversion therapy, (aka: Sexual Orientation and Gender Identity Change Efforts) are not scientifically sound practices and they cause significant harm to all. Banning these practices from use with minors is a good start. Next we must ban them outright from all professional use.

**Commenter:** Shawn Senning

3/20/19 7:02 am

**Conversion Therapy**

Conversion Therapy is brainwashing. Never in my years of training, as a counselor, was the subject to to CONVERT someone from one thing to another EVER broached. Remember how well that worked for left handers? BORN THAT WAY. If we want to continue to up the numbers of



suicides in this country, Conversion therapy may be a perfect answer. If one is looking to embrace people the way they were meant to be and enable wholeness, kindness and love, then Conversion therapy needs to be banned. If you want to convert to a different religion, that is a decision. Being born a particular way is NOT a choice. No one chooses to be subject to abuse, rejection, bullying and the like. Welcome to 2019. Conversion Therapists are money making killers. I'd venture to say, many of them are of the LGBTQ community , themselves.

**Commenter:** Virginia Tech Counselor Education and Supervision

3/20/19 7:08 am

**Re: Conversion Therapy**

It is with utmost sense of responsibility and passion for evidence-based intervention, that I call your esteemed attention to the above stated subject matter.

Research shows that "compared with LGBTQ young people who were not rejected or were only a little rejected by their parents because of their gay or transgender identity, highly rejected LGBTQ young people were eight times more likely to have attempted suicide."

The definitive document that provides evidence that conversion therapy is both ineffective and harmful is provided by the American Psychological Association (APA) report titled Appropriate Therapeutic Responses to Sexual Orientation. For this report, APA conducted a systematic review of the available research on sexual-orientation-change efforts—83 studies in all. The report concluded that: "efforts to change sexual orientation are unlikely to be successful and involve some risk of harm." In fact, the report documented that up to 50% of participants in conversion-therapy practices reported harmful effects from the attempt to change their sexual orientation.

The APA report went on to state several scientific facts: that, "same-sex sexual attractions, behavior and orientations per se are normal and positive variants of human sexuality—in other words, they do not indicate either mental or developmental disorders." All mental-health professions, including counseling, psychiatry, psychology, social work, and marriage and family therapy have endorsed this position. As such, there is nothing to "convert" or "repair" in an individual with same-sex attraction. Mental-health clinicians are venturing outside the appropriate boundaries of their scope of practice if they attempt to change a client's sexual orientation.

**Commenter:** Gaetan Desombre

3/20/19 7:13 am

**Ban this insane therapy!**

The conversion therapy is an abusive, disrespectful and inhuman practice that should have never ever been considered !

Are we still living in such barbaric times? Wake up people! Thank you

**Commenter:** Anna-Marie York

3/20/19 7:16 am

**Conversion "therapy"**

There is no scientific basis supporting conversion therapy. It is mentally damaging to youth to try and change the way they were born rather than accept who they are. Suicide rates among LGBT youth are already far too high. Conversion therapy is more likely to contribute to suicidal thoughts than prevent them. Let us, as a society, love and value the children we have, not bully them.

**Commenter:** Debby Porter

3/20/19 7:23 am

### **Conversion Therapy**

Conversion therapy is ignorant, barbaric, and when targeted at a young person, amounts to child abuse. There should be no religious exemption that allows for the psychological torture of a dependent child.

**Commenter:** Margaret DeTar-Lavallee

3/20/19 7:43 am

### **"Conversion" therapy is harmful**

Conversion therapy, used to change an individual's sexual orientation or gender preference, can be extremely harmful to patients, especially young people. Scientifically, it cannot change an individual's innate identity without doing harm, and morally, it begins by convincing an individual that they are somehow wrong or broken. LGBTQ individuals are not wrong or broken. In virtually every species, there are those who are not strictly conforming to gender norms. People are different. Those that insist that LGBTQ individuals need to be fixed or cured are imposing their very narrow worldview and religious teachings on others. In a country where we are supposed to be free of religious persecution, this is abominable.

**Commenter:** Gail Christie

3/20/19 7:49 am

### **Conversion Therapy**

This practice has been thoroughly discredited by mental health professionals and causes great psychological harm. It should be banned.

**Commenter:** Laura Welfare, Virginia Tech

3/20/19 7:58 am

### **Please Ban Conversion "Therapy"**

Thank you, Virginia Board of Counseling, for taking this important action to protect vulnerable citizens from fraud. The consensus of the national professional organizations that represent counselors, psychologists, marriage and family therapists, social workers, and psychiatrists all oppose the use of conversion "therapies." Ample scientific research has shown unequivocally that attempts to change sexual orientation are harmful to the client and ineffective. Counselors who advertise or practice conversion "therapies" are knowingly endangering their clients and promoting an ineffective approach. This ban is an important step towards protecting Virginia citizens from harmful, fraudulent counseling services.

**Commenter:** Curtis Cornell, RN, MSN

3/20/19 8:16 am

### **Stop Directing Conversion Therapy through Legislation**

Directing therapy through legislation to achieve an agenda is harmful and pushes a minority and harmful perspective on compromised individuals. Creation is undeniable. Let counselors do there job!

**Commenter:** Alan Batson

3/20/19 8:17 am

**A psychiatrist tried to “cure” me when I was age 14.**

Dr. Miles Corbin. Nashville Tennessee. 1977-1979. It did not work. I tried and tried and tried to be straight. It does not work to convert. In fact it permanently imbeds in your brain **you are flawed and can not be fixed.**

If homosexuals set up camps to convert straight youth to be gay, it would be considered abusive. Imagine . . . gay people converting children?! There’s your answer. Straight adults trying to mess with children’s sexuality BEFORE they are even supposed to sexual is SEXUAL ABUSE.

I was ultimately disowned by my three-times-divorced father when I asked him to treat my gay male spouse of 15 years as one of the family.

**Commenter:** Sharon Custer-Boggess

3/20/19 8:24 am

**Conversion therapy**

It is hard enough for a young person to discover who she is without having someone else's biases imposed on her. It is imperative that conversion therapy, which has no scietific basis, be eliminated from possibility.

**Commenter:** Jane Louie

3/20/19 8:29 am

**Conversion therapy is not based on science**

Conversion therapy has not been demonstrated to work. It is harmful to LGBTQ+ people in general and youth in particular, sending the message that there is something wrong with them.

**Commenter:** Erin Coe

3/20/19 8:41 am

**Conversion Therapy is Child Abuse**

Please do not allow ANY FORM of conversion therapy to be allowed on minors in the state of Virginia. Do your reasearch and listen to the overwhelming evidence provided by licensed mental health professionals who will tell you that conversion therapy is tantamount to child abuse.

**Commenter:** Kathy Gonzales

3/20/19 8:46 am

**Ban Conversion Therapy**

Conversion Therapy is nothing but a tool used by intolerant religious zealots to mentally and physically abuse people who are not straight and identify as their birth gender. It is wrong and severely damaging to everyone involved.

**Commenter:** Annora Borden

3/20/19 8:47 am

### **Ban conversion therapy**

This guidance will protect youth from so-called "conversion therapy," a dangerous and discredited practice aimed at changing their sexual orientation or gender identity. These dangerous and discredited practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis. This guidance protects young people from state-licensed therapists in Virginia who falsely claim to parents and youth that being LGBTQ is a mental illness, and therefore taking advantage of parents and harming vulnerable youth. These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are. These practices are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts. No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people. We can't allow one more young person to be targeted and hurt by these dangerous and discredited practices.

**Commenter:** Kelly Gotschalk

3/20/19 8:49 am

### **Ban conversion therapy**

Conversion therapy is harmful and hateful and should be banned. Please work to make this happen in VA.

**Commenter:** Delegate Mark Levine

3/20/19 8:53 am

### **Conversion Therapy is Child Abuse**

Conversion Therapy is Child Abuse

And I would support legislation allowing victims of this child abuse to sue their abusers for damages, which would include compensation for therapy for post-traumatic stress and other harms.

Rely on the science. To force children -- or really anyone -- against their will to do something that is impossible is, ipso facto, traumatizing.

The torture can be physical, mental, emotional, or psychological. But torture it is. And any clinician who does so should not only lose their license but should also suffer civil penalties (and criminal ones, if physical torture is used).

**Commenter:** Nancy Blethen

3/20/19 9:06 am

### **Ban Conversion Therapy for good!**

Conversion thereapy is abuse. It is an awful, evil practice that tortured people and causes major ptsd in those that survive. Many will commit suicide. Any practitioner that is licensed in Virginia should NOT be allowed to continue this type of cruel treatment and stay licensed. They should be censured, fined and held accountable for the mental anguish they are creating. Conversion therapy- believing that someone isn't really gay if they try hard enough - is evil.

**Commenter:** Alex Weathersby

3/20/19 9:07 am

### **Ban Conversion Therapy**

Conversion therapy encourages medicalizing and abusing children for their unchangeable identities. Ban it.

**Commenter:** Crystal Schubert

3/20/19 9:07 am

### **Ban Harmful Conversion Therapy**

Conversion therapy is dangerous, immoral, and unscientific. Homosexuality is not a mental illness, and does not need to be "cured." Real people, often children, are directly harmed by conversion therapy.

**Commenter:** Jerry Akers

3/20/19 9:09 am

### **Conversion Therapy is good**

Sexual or romantic attractions or feelings toward individuals of the same gender is un-natural and against God's original design of one man/one woman marriage. When a young man or woman struggles with these un-natural feelings or thoughts it is a good thing to seek help from a counselor. Mandating a regulation from Richmond that prevents ALL counselors giving wise, biblical counsel is against nature and against God's ways.

**Commenter:** Helen Rich, PhD Candidate

3/20/19 9:26 am

### **Science clearly supports the banning of "conversion therapy"**

The American Psychological Association's 2009 report (ten years old!) is very clear on the fact that there is insufficient evidence to support the use of "conversion therapy" in treating minors who experience same-sex attraction. If such attraction is unwanted, psychologists have other resources and methods for helping the minor in question. From the report:

"The task force conducted a systematic review of the peer-reviewed journal literature on sexual orientation change efforts (SOCE) and concluded that efforts to change sexual orientation are unlikely to be successful and involve some risk of harm, contrary to the claims of SOCE practitioners and advocates.

Even though the research and clinical literature demonstrate that same-sex sexual and romantic attractions, feelings and behaviors are normal and positive variations of human sexuality, regardless of sexual orientation identity, the task force concluded that the population that undergoes SOCE tends to have strongly conservative religious views that lead them to seek to change their sexual orientation.

Thus, the appropriate application of affirmative therapeutic interventions for those who seek SOCE involves therapist acceptance, support and understanding of clients and the facilitation of clients' active coping, social support and identity exploration and development, without imposing a specific sexual orientation identity outcome."

<https://www.apa.org/pi/lgbt/resources/sexual-orientation>

**Commenter:** Sandy Marks

3/20/19 9:30 am

### **State Sponsored Child Abuse?**

Science has confirmed, time and again, that not only does "conversion therapy" not work, it traumatizes otherwise perfectly healthy children. The only conversion necessary today is that of intolerance and disgust to tolerance, understanding, and acceptance. I ask of those heterosexual legislators supporting this kind of abuse in the name of religion: could you be "converted"? How much psychological and physical abuse would it take for you to convince yourself you were, or pretend to be, gay? Conversion therapy cannot be condoned by the state as representative of the people's values. The people don't wish to harm each other, children least of all. Please ban "conversion therapy" in the face of religious zealots and in the name of Virginia voters.

**Commenter:** Lindsay Donovan

3/20/19 9:32 am

### **Conversion Therapy is Abuse!**

Conversion therapy has no scientific or medical backing and is detrimental to the mental health and stability of a person.

Forcing children (or even adults) in to this horrific practice is cruel and abusive. Not only does it not work, it increases rates of depression, anxiety, and suicidality.

Victims forced to enter a conversion program should be able to sue their abusers for damages.

Please review the research which can be found through these websites:

<https://www.hrc.org/resources/the-lies-and-dangers-of-reparative-therapy>

<https://www.thetrevorproject.org/get-involved/trevor-advocacy/50-bills-50-states/about-conversion-therapy/>

**Commenter:** Jeff Caruso

3/20/19 9:35 am

### **Oppose Guidance Document (125-9)**

Dear Virginia Board of Psychology,

The Virginia Catholic Conference is the public policy agency representing Virginia's Catholic bishops and their two dioceses. The Conference urges the Board of Psychology to reject the draft "Guidance Document on the Practice of Conversion Therapy (125-9)." If implemented, 125-9 would usurp the primary and fundamental role of parents, violate First Amendment rights, and exceed regulatory authority.

### **Role of parents**

Healthcare decisions involving the mental and emotional health of children do not fit neatly into “one-size-fits-all” regulations. Parents are closest to their children’s challenges. They know their unique needs and are in the best position to identify solutions. Some young people may have attractions they desire to change or moderate. Others may simply desire counseling to live a chaste life compatible with their religious or personal values. In either instance, there should be options available for families to make informed decisions.

Just as parents must give consent for over-the-counter medications,[1] field trips, and extracurricular activities, they have the constitutional right to guide mental health care for their children.

*The child is not the mere creature of the State; those who nurture him and direct his destiny have the right, coupled with the high duty, to recognize and prepare him for additional obligations.[2]*

125-9 also violates the presumption of parental autonomy in Virginia. Code Sec. 1-240.1 provides that a parent has the fundamental right to make decisions concerning the upbringing, education and care of the parent’s child.

Families should also be able to freely make these decisions in private consultation with their child’s therapist.

### **First Amendment**

The First Amendment prohibits the government from favoring one viewpoint over another.

[T]he government has no power to restrict expression because of its message, its ideas, its subject matter or its content. . . . [T]he requirement that the government be content neutral in its regulation of speech means that the government must be both viewpoint neutral and subject-matter neutral. The viewpoint-neutral requirement means that the government cannot regulate speech based on the ideology of the message.[3]

125-9 defines “conversion therapy” or “sexual orientation change efforts” as *any practice or treatment that seeks to change an individual’s sexual orientation . . . or eliminate or reduce sexual or romantic attractions or feelings toward individuals of any gender*. Because it seeks, for example, to prohibit the provision of licensed services to help clients achieve alignment between their subjective sense of gender and their objective biological sex while permitting services to assist clients towards a subjective sense of gender at odds with their objective biological sex, it is neither content nor viewpoint neutral. In addition, 125-9 would allow those who provide services to assist clients in directing their attractions in one direction but not in the other direction.

Document 125-9, therefore, gives the Board sweeping authority to sanction therapists’ speech and engage in unconstitutional viewpoint discrimination.

As applied to faith-based, licensed psychologists, 125-9 also would result in censorship of religious beliefs in violation of the First Amendment.

To comply with 125-9, these psychologists must terminate or self-censor any conversation with a client that may tend toward reducing same-sex attraction, regardless of the client’s or family’s desire to seek counsel. Because of this, 125-9 would also impermissibly restrict a patient’s First Amendment freedom to speak candidly about intimate concerns and to receive counsel.

Ethics rules should be enforced and frequently examined for effectiveness and uniformity across all professions. They should also not be applied in ways that are biased to favor certain viewpoints or to target others for sanction. At a minimum, speech must be protected.

Conversely, 125-9 sets a double standard. It does not, for example, sanction dangerous treatments aimed at accelerating “gender transition” among children, e.g., through irreversible surgery or hormonal treatments.

### **Exceeding regulatory authority**

For reasons such as those explained above, the General Assembly has rejected legislation to ban “conversion therapy.” In 2016, the legislature rejected three such bills in committee: **(SB 262 and**

**SB 267**, Senators Surovell and Dance; and **HB 427**, Delegate Hope) that would have prohibited “conversion therapy” on persons under 18 to change sexual orientation or gender identity.

Similarly in 2018, the General Assembly rejected two bills (**HB 363**, Delegate Hope; **SB 245** Senator Surovell) which would have prohibited counselors from providing any treatment to those under 18 which would seek to change an individual’s sexual orientation or gender identity, including efforts to change behaviors or gender expressions or to eliminate or reduce sexual or romantic attractions or feelings toward individuals of the same sex. Nearly identical to 125-9, these bills were also defeated in committee.

Administrative agencies can adopt rules and policies to carry out duties delegated by the legislature. The rules and policies, however, should be consistent with statutory provisions.[4] The General Assembly has specifically and repeatedly rejected proposed “conversion therapy” bans. The Board does not have the authority to adopt 125-9 because doing so would circumvent the General Assembly’s decisions in this matter.

Accordingly, the Virginia Catholic Conference urges the Board of Psychology to reject 125-9.

[1] [http://www.doe.virginia.gov/support/health\\_medical/medication/manual\\_training\\_admin-meds.pdf](http://www.doe.virginia.gov/support/health_medical/medication/manual_training_admin-meds.pdf)

[2] *Pierce v. Society of Sisters*, 268 U.S. 510 (1925). See also *Wisconsin v. Yoder* (1972).

[3] Erwin Chemerinsky, *Content Neutrality as a Central Problem of Freedom of Speech in the Supreme Court’s Application*, Southern California Law Review, Vol. 74: 49, 51 (2000). Citing *Police Dep’t. v. Moseley*, 408 U.S. 92, 95 (1972).

[4] *Mobil Oil Exploration & Producing Southeast v. United Distrib. Cos.*, 498 U.S. 211 (U.S. 1991)

**Commenter:** Sylvia Owens

3/20/19 9:38 am

### **Conversion therapy is wrong**

Conversion therapy Has been discredited as harmful and abusive to people who have no choice of who they are. We have no right to judge others and impose irrational values on them. It is not up to the government to intrude into people’s lives and homes.

**Commenter:** Alexis Rodgers, Virginia Young Democrats

3/20/19 9:41 am

### **Ban Conversion Therapy in Virginia**

I am writing to support restrictions - and an outright ban - on sexual orientation conversion therapy in the Commonwealth.

Conversion therapy is opposed by most major professional health and mental health organizations. In fact, scientific research has found that sexual orientation change efforts are detrimental to personal and public health.

Research from the University of San Francisco found that young people who experience "shame" because of their sexual orientation were:

- 8 times more likely to attempt suicide
- 6 times more likely to report high levels of depression
- 3 times more likely to use illegal drugs



Minors deserve special protections from abuse and other negative actions that put them at long-term risk of endangering themselves or others. Hence, the scientific evidence is clear that conversion therapy should be banned on minors.

I serve as President of Virginia Young Democrats and our organization has long advocated for a ban on this harmful practice through the legislative process. We are hopeful that this important public health issue will now be addressed through the regulatory process.

Thank you.

Alexsis

**Commenter:** Mara Sherman

3/20/19 9:42 am

### **Conversion Therapy is Torture**

Conversion "therapy" is inconsistent with the values of the commonwealth of Virginia. LGBT identity is not a disease to be cured, and people who practice it are ignorant at best and abusive at worst.

**Commenter:** Cynthia Williams

3/20/19 9:42 am

### **Conversion Therapy**

Ban Conversion Therapy.

**Commenter:** Alex Sprague

3/20/19 9:43 am

### **Love one another**

Conversion therapy & curing autism have one thing in common: it doesn't work but some people want it done anyway. Come on, why can't we accept LGBTQ's & those with mental disabilities as they are? We're human beings, not diseases!

**Commenter:** Melissa Benn, DC Rollergirls

3/20/19 9:44 am

### **Ban Harmful Conversion "Therapy"**

"Conversion therapy" is a dangerous and discredited practice based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis. State-licensed therapists in Virginia who falsely claim to parents and youth that being LGBTQ is a mental illness should be disbarred. They take advantage of parents and harm vulnerable youth. These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are. These practices are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts. No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for everyone. We can't allow one more young person to be targeted and hurt by these dangerous and discredited practices. Ban conversion therapy in Virginia.

**Commenter:** jennifer oboyle

3/20/19 9:57 am

### **Ban Conversion Therapy**

Conversion therapy has been proven again again to be cruel and ineffective. This institutional abuse must be banned. These dangerous and discredited practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis.

**Commenter:** Sandra Tobias

3/20/19 10:02 am

### **Ban Harmful Conversion “Therapy”**

Science has proven that there is no benefit whatsoever to this terrible practice.

**Commenter:** Rickie carter

3/20/19 10:09 am

### **Conversion therapy helps people fulfill their wish to leave the abusive Gay life style.**

People choose to live a Gay life style according to Professor Myer from John Hopkins University. He has studied over 500 research papers about the gay gene and being born gay and found that it isn't true. Most of the so called studies were not peer reviewed or duplicated. Professor Myer was pro gay before the study and just wants to help Gays learn they can leave that life style. The web site Atlantis Rising has his complete study on their web site. Please allow people the right to choose their own medical help and who will help them. It is their right as an American. .

**Commenter:** Karla Eisen MSW MPH

3/20/19 10:11 am

### **Ban conversion therapy (aka: Sexual Orientation and Gender Identity Change Efforts)**

**Science clearly supports the banning of "conversion therapy" (aka: Sexual Orientation and Gender Identity Change Efforts)** The American Psychological Association's 2009 report is clear on the fact that there is insufficient evidence to support the use of "conversion therapy" in treating minors who experience same-sex attraction. If such attraction is unwanted, psychologists have other resources and methods for helping the minor in question. Sexual-orientation conversion therapy is a form of Child Abuse. The torture can be physical, mental, emotional, or psychological.

**Commenter:** Drew-Marie Lewis

3/20/19 10:13 am

### **Conversion "therapy" is a form of child abuse, and hardly therapeutic.**

Conversion "therapy" is a form of child abuse. And I would support legislation allowing victims of this child abuse to sue their abusers for damages, which would include compensation for therapy for post-traumatic stress and other harms. Rely on the science. To force children -- or really anyone -- against their will to do something that is impossible is, ipso facto, traumatizing. The torture can be physical, mental, emotional, or psychological. But torture it is. And any clinician who does so should not only lose their license but should also suffer civil penalties (and criminal ones, if physical torture is used).

**Commenter:** Shelley Fleming

3/20/19 10:18 am

**Protect Viewpoint Freedom**

If implemented, 125-9 would usurp the primary and fundamental role of parents, violate First Amendment rights, and exceed regulatory authority. Please protect viewpoint and religious freedom. How does banning an option for therapy when a child is confused about their sexuality protect children? Please do not pass this discriminatory regulation. It's wrong.

**Commenter:** Joe Rincione

3/20/19 10:19 am

**Conversion Therapy is child abuse**

So-called "conversion therapy" is an inhumane form of forced child abuse. Do not allow this malpractice in our state.

**Commenter:** Dawn M. Adams DNP, ANP-BC Delegate Virginia Assembly

3/20/19 10:25 am

**Conversion therapy is dangerous**

Conversion therapy is a dangerous practice that has been proven to be ineffective, and is particularly harmful to youth. Being gay is not a disease or disorder and does not need to be "fixed." Attempts to make someone different from who they are have life long consequences that include depression, substance abuse, and suicidal ideation; regulations are helpful, but banning the practice through Code is more appropriate.

**Commenter:** Kayla Loper

3/20/19 10:30 am

**These practices are inhuman and unethical**

The practices of "conversion therapy" are contrary to the ethical standards of mental health professionals. They use shame and fear as methods of "altering the personality" which is completely contrary to the oath taken by medical professionals to do no harm. Regardless of your religious preferences this practice is violent, wrong, unethical, and inhumane. It should be recognized as a violation of human rights!

**Commenter:** Hillary Gerson

3/20/19 10:31 am

**Ban conversion therapy. Love is love. #rowanshurricane #aidensfire**

**Commenter:** Joanne Goodwin

3/20/19 10:43 am

**Conversion Therapy is Traumatic**

Yes --ban conversion therapy. It is abusive to anyone--no matter what age. It is traumatic, trying to force someone to be what they are not and telling them that they are wrong. Not their actions, them as people. Conversion therapy is cruel and unusual punishment for something that is not even a crime.

**Commenter:** Caitlin Keefe

3/20/19 10:47 am

### **Stop intentionally harming kids**

Please follow your own “do no harm” oaths. Conversion is a hateful practice and violates all moral and ethical standards.

**Commenter:** Steve Baker

3/20/19 10:50 am

### **Children need love and support - Yes on Guidance Document 125-9**

Children need respect, love and support to develop and enjoy happy, healthy lives. They don't need torture to be someone else. I am happy to stand with Equality Virginia in support of Guidance Document 125-9.

**Commenter:** Jeffrey F. Caruso, Virginia Catholic Conference

3/20/19 11:07 am

### **Oppose Guidance Document (125-9)**

Dear Virginia Board of Psychology,

The Virginia Catholic Conference is the public policy agency representing Virginia's Catholic bishops and their two dioceses. The Conference urges the Board of Psychology to reject the draft “Guidance Document on the Practice of Conversion Therapy (125-9).” If implemented, 125-9 would usurp the primary and fundamental role of parents, violate First Amendment rights, and exceed regulatory authority.

#### **Role of parents**

Healthcare decisions involving the mental and emotional health of children do not fit neatly into “one-size-fits-all” regulations. Parents are closest to their children's challenges. They know their unique needs and are in the best position to identify solutions. Some young people may have attractions they desire to change or moderate. Others may simply desire counseling to live a chaste life compatible with their religious or personal values. In either instance, there should be options available for families to make informed decisions.

Just as parents must give consent for over-the-counter medications,[1] field trips, and extracurricular activities, they have the constitutional right to guide mental health care for their children.

*The child is not the mere creature of the State; those who nurture him and direct his destiny have the right, coupled with the high duty, to recognize and prepare him for additional obligations.[2]*

125-9 also violates the presumption of parental autonomy in Virginia. Code Sec. 1-240.1 provides that a parent has the fundamental right to make decisions concerning the upbringing, education and care of the parent's child.

Families should also be able to freely make these decisions in private consultation with their child's therapist.

#### **First Amendment**

The First Amendment prohibits the government from favoring one viewpoint over another.

[T]he government has no power to restrict expression because of its message, its ideas, its subject matter or its content.... [T]he requirement that the government be content neutral in its regulation of speech means that the government must be both viewpoint neutral and subject-matter neutral. The viewpoint-neutral requirement means that the government cannot regulate speech based on the ideology of the message.[3]

125-9 defines "conversion therapy" or "sexual orientation change efforts" as *any practice or treatment that seeks to change an individual's sexual orientation...or eliminate or reduce sexual or romantic attractions or feelings toward individuals of any gender*. Because it seeks, for example, to prohibit the provision of licensed services to help clients achieve alignment between their subjective sense of gender and their objective biological sex while permitting services to assist clients towards a subjective sense of gender at odds with their objective biological sex, it is neither content nor viewpoint neutral. In addition, 125-9 would allow those who provide services to assist clients in directing their attractions in one direction but not in the other direction.

Document 125-9, therefore, gives the Board sweeping authority to sanction therapists' speech and engage in unconstitutional viewpoint discrimination.

As applied to faith-based, licensed psychologists, 125-9 also would result in censorship of religious beliefs in violation of the First Amendment.

To comply with 125-9, these psychologists must terminate or self-censor any conversation with a client that may tend toward reducing same-sex attraction, regardless of the client's or family's desire to seek counsel. Because of this, 125-9 would also impermissibly restrict a patient's First Amendment freedom to speak candidly about intimate concerns and to receive counsel.

Ethics rules should be enforced and frequently examined for effectiveness and uniformity across all professions. They should also not be applied in ways that are biased to favor certain viewpoints or to target others for sanction. At a minimum, speech must be protected.

Conversely, 125-9 sets a double standard. It does not, for example, sanction dangerous treatments aimed at accelerating "gender transition" among children, e.g., through irreversible surgery or hormonal treatments.

### Exceeding regulatory authority

For reasons such as those explained above, the General Assembly has rejected legislation to ban "conversion therapy." In 2016, the legislature rejected three such bills in committee: (**SB 262 and SB 267**, Senators Surovell and Dance; and **HB 427**, Delegate Hope) that would have prohibited "conversion therapy" on persons under 18 to change sexual orientation or gender identity.

Similarly in 2018, the General Assembly rejected two bills (**HB 363**, Delegate Hope; **SB 245** Senator Surovell) which would have prohibited counselors from providing any treatment to those under 18 which would seek to change an individual's sexual orientation or gender identity, including efforts to change behaviors or gender expressions or to eliminate or reduce sexual or romantic attractions or feelings toward individuals of the same sex. Nearly identical to 125-9, these bills were also defeated in committee.

Administrative agencies can adopt rules and policies to carry out duties delegated by the legislature. The rules and policies, however, should be consistent with statutory provisions.[4] The General Assembly has specifically and repeatedly rejected proposed "conversion therapy" bans. The Board does not have the authority to adopt 125-9 because doing so would circumvent the General Assembly's decisions in this matter.

Accordingly, the Virginia Catholic Conference urges the Board of Psychology to reject 125-9.

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[1] [http://www.doe.virginia.gov/support/health\\_medical/medication/manual\\_training\\_admin-meds.pdf](http://www.doe.virginia.gov/support/health_medical/medication/manual_training_admin-meds.pdf)

[2] *Pierce v. Society of Sisters*, 268 U.S. 510 (1925). See also *Wisconsin v. Yoder* (1972).

[3] Erwin Chemerinsky, *Content Neutrality as a Central Problem of Freedom of Speech in the Supreme Court's Application*, Southern California Law Review, Vol. 74: 49, 51 (2000). Citing *Police Dept. v. Moseley*, 408 U.S. 92, 95 (1972).

[4] *Mobil Oil Exploration & Producing Southeast v. United Distrib. Cos.*, 498 U.S. 211 (U.S. 1991)

**Commenter:** Murph

3/20/19 11:08 am

**Conversion therapy should absolutely be banned! It's extremely harmful.**

**Commenter:** Amy Cannon

3/20/19 11:10 am

### **Conversion Therapy**

Banning so-called "conversion therapy" in Virginia is necessary to protect children from this harmful practice. "Conversion therapy," is a dangerous and discredited practice aimed at changing the sexual orientation or gender identity of a person, often against their will. This is based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis.

We must protect young people from state-licensed therapists in Virginia who falsely claim to parents and youth that being LGBTQ is a mental illness. They are taking advantage of parents, and harming vulnerable youth. These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are. "Conversion therapy" tactics are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts. No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people. We can't allow one more young person to be targeted and hurt by these dangerous and discredited practices.

**Commenter:** Sabina

3/20/19 11:21 am

### **Please Ban Conversion Therapy**

Please ban conversion therapy. Conversion therapy does not help youth- it harms them into thinking they are not okay the way they are, and worsens the already rampant problem of LGBTQ youth having huge risks for mental health conditions. LGBTQ youth already have disproportionately high rates of suicide, along with depression and substance abuse, due to the messaging they receive from society and sometimes from their own families that there is something wrong with them being who they are. Please do not allow trusted therapists to worsen this problem by sanctioning these practices which compound the harm.

Even if you believe that there is actually something wrong with LGBTQ people (which you shouldn't), there is absolutely no scientific evidence that this can be "cured" by conversion therapy. These practices do nothing but harm and do not even accomplish the goal they seek out to meet.

Please let science, and compassion, guide your choice and ban conversion therapy.

3/20/19 11:22 am

**Commenter:** Michael Bonevich

**Ban Conversion therapy**

Conversion therapy is harmful and dangerous.

**Commenter:** Katherine Drummond

3/20/19 11:23 am

**Please ban conversion therapy!**

Please ban conversion therapy! This practice is abhorrent and leads to high rates of suicide.

**Commenter:** Elisabet Michaaelsen

3/20/19 11:27 am

**Conversion therapy**

Conversion therapy should be banned. It is coercion and does not work. It is cruel and should not be allowed.

**Commenter:** Kathryn Haines

3/20/19 11:32 am

**Ban Conversion Therapy**

Enforce a standard of care; clarify the practice of conversion therapy is unacceptable

**Commenter:** Mackenzie

3/20/19 11:33 am

**Conversion therapy is abusive and should be an illegal practice**

Conversion therapy is a toxic and abusive type of "therapy" dont abuse LGBT children because you think your religion is the main priority. Children's happiness and healthiness comes before people's view of what a 2000 year old book say. Conversion therapy should be banned 100% and should be classified as a hate crime and organizations should be labeled as hate filled organizations

**Commenter:** Erin Paula can Beveren

3/20/19 11:35 am

**No to conversion therapy.**

Conversion therapy is not the answer. It will do extreme hurt and damage to the person. One can not change the way you were born.

**Commenter:** Amy Latalladi-Fulton, Proud Virginian

3/20/19 11:35 am

**Support Guidance Doc. 125-9/ Ban Conversion Therapy By Supporting Our Youth As They Are**

"Therapy directed specifically at changing sexual orientation is contraindicated, since it can provoke guilt and anxiety while having little or no potential for achieving changes in orientation." -

The American Academy of Pediatrics, 1993

(<https://pediatrics.aappublications.org/content/pediatrics/92/4/631.full.pdf>)

Several leading medical, pediatric, psychiatric, psychological, and education organizations have denounced the practice of conversion therapy. Numerous studies over the past 30 years have indicated that not only does conversion therapy not yield a desirable outcome (unsurprising, since you cannot fix a person who is not inherently broken), it produces long-lasting harmful ramifications such as those noted above. Please read more about the professional opinions of the negative side effects of conversion therapy here: <https://www.apa.org/pi/lgbt/resources/just-the-facts.pdf>.

Children need our help: we should feed them, clothe them, educate them, and tell them that they matter and that they are loved... it is no one's place to tell children that how they present themselves or how they feel about other people is wrong. Teach them kindness, not rigid gender or sex stereotypes. A person's sexual orientation is not a person's character; it is simply an immutable aspect of the person that was born into this world.

Thank you for the publication of this guidance. Our great Commonwealth should not support this form of child abuse.

**Commenter:** Jacqueline Lynch

3/20/19 11:37 am

#### **Freedom of Therapy**

Government should not be dictating to patients and to therapists. Let people seek what they want, and do not punish therapists.

**Commenter:** Caryll-Ann Schenker

3/20/19 11:43 am

#### **Conversion Therapy**

Ban Conversion Therapy, reduce LGBTQ suicide.

**Commenter:** Candace Graham

3/20/19 11:43 am

#### **NO to conversion therapy**

Conversion therapy is abusive and should be illegal.

**Commenter:** Jennessa Agnew

3/20/19 11:44 am

#### **No Conversion Therapy**

Conversion Therapy is wrong. We should be empowering all people, especially young people to feel comfortable and happy with who they are discovering themselves to be, in all senses of that term. Love is love and this detrimental therapy has no place in Virginia!

**Commenter:** Josh Israel

3/20/19 11:48 am

#### **Please protect Virginia's kids from harmful "therapy"**



I urge you to use your powers to protect kids from the abusive scam that is conversion therapy. Every reputable medical organization has found that these so-called "treatments" are ineffective and harmful. With high rates of depression and suicide already a major problem for LGBTQ kids, the last thing they need is scientifically bogus treatment that has no effect other than to make them feel worse about who they are. It is 2019. Fifteen states and the District of Columbia have already taken this obvious step. It's high time Virginia catch up.

**Commenter:** David Barr

3/20/19 11:52 am

**ban conversion "therapy". It actively harms people**

There is zero evidence that conversion therapy is needed or does any good. There is SIGNIFICANT evidence that it actively causes harm. There isn't even evidence that it does what it claims to do. It actively tells people that who they are is fundamentally wrong. Done to adults this is damaging enough. Done to minor this is FAR more damaging and they have much less ability to avoid it. The practice itself actually uses shame to try and change people. This is psychological abuse.

Making the practice illegal actively protects minors. Anyone, particularly minors, should be able to go to a mental health professional and trust that they are being given ethical, helpful and sound care.

**Commenter:** Amy Wentz

3/20/19 11:53 am

**End Conversion Therapy**

Please ban this harmful practice. End Conversion Therapy!

**Commenter:** Suzanne Nadeau

3/20/19 11:57 am

**Conversion Therapy**

Any and all professional psychologists/psychiatrists performing any type of conversion therapy should have their license to practice suspended - PERMANENTLY. Conversion Therapy is cruel, harmful and undoubtedly a form of psychological warfare on the LGBTQ and trans community. ENOUGH!

**Commenter:** James Millner, Virginia Pride

3/20/19 11:58 am

**Conversion therapy is abuse**

So-called "Conversion Therapy" is nothing less than child abuse. All of the nation's leading professional medical and mental health associations have rejected conversion therapy as unnecessary, ineffective, and dangerous. These groups have cautioned that the practices do not work and have warned patients that they may be harmful. For example, the American Psychological Association "advises parents, guardians, young people, and their families to avoid sexual orientation change efforts that portray homosexuality as a mental illness or developmental disorder and to seek psychotherapy, social support, and educational services that provide accurate

information on sexual orientation and sexuality, increase family and school support, and reduce rejection of sexual minority youth."

It is unconscionable that we would allow mental health professionals to engage in this harmful practice. It should be illegal and those who inflict conversion therapy on minors should have their licenses to practice in Virginia revoked.

**Commenter:** Ngiste Abebe, New Leaders Council Virginia

3/20/19 12:05 pm

### **Ban harmful, unethical, and unscientific conversion therapy**

I'm writing in support of a ban on conversion "therapy"--if you can call a practice that leads to LGBTQ young people being 8 times more likely to attempt suicide and 6 times more likely to report high levels of depression therapeutic. It is unethical to call those types of interventions therapy as they cause irreparable harm. It is unscientific, as no evidence shows any conversion practice to be effective.

Furthermore, banning conversion therapy is supported by an overwhelming number of professional organizations. Including but not limited to: American Academy of Child Adolescent Psychiatry, American Academy of Pediatrics, American Association for Marriage and Family Therapy, American College of Physicians, American Counseling Association, American Medical Association, American Psychiatric Association, American Psychoanalytic Association, American Psychological Association, American School Counselor Association, American School Health Association, National Association of Social Workers, and the World Psychiatric Association.

Surely it is time for Virginia to protect the next generation from these harmful, fraudulent practices.

Ngiste Abebe, Co-director of New Leaders Council Virginia

**Commenter:** Amber Yancey

3/20/19 12:09 pm

### **Ban Conversion Therapy**

Conversion therapy should be banned. It is counterintuitive and can potentially make suicide rates increase in the LGBTQ+ community.

**Commenter:** M.J. Sadler

3/20/19 12:11 pm

### **Ban Conversion Therapy**

Evidence based research has established conversion "therapy" is harmful. Defining this practice as constituting misconduct on the part of the therapist is appropriate.

**Commenter:** Joel McDonald, Affirmation LGBTQ Mormons, Families & Friends

3/20/19 12:11 pm

### **Conversion Therapy is Ineffective and Dangerous**

Coming from a faith tradition with a heartbreaking connection to conversion therapy, and now working with so many who have suffered through such therapies, and continue to suffer as a result of those therapies, I know for certain that conversion therapy is not only ineffective but also dangerous.

According to Dr. Jack Drescher of the American Psychiatric Association, "People spend a lot of time and money on these treatments that don't work... So many people report that they feel depressed, suicidal, anxious, and hopeless, those are not uncommon responses to a failed treatment" (ABC News). They blame themselves when they aren't cured or aren't able to fully suppress their attractions to the same gender.

Conversion therapy should be a banned practice for all individuals, but children should at the very least be protected against being forced into treatments which show no credible evidence of success and cause long-term harm to their mental health.

**Commenter:** Barbra Stanley

3/20/19 12:12 pm

### **Ban Conversion Therapy**

This is ridiculous and barbaric. Can we please move into a future that is fair,just and equal for all.

**Commenter:** Spencer Fox

3/20/19 12:13 pm

### **Unethical & Harmful**

Conversion therapy is above all, psychologically painful to its victims. More importantly, it is entirely based in religious belief and not remotely supported by scientific data.

**Commenter:** Patrick Dolan

3/20/19 12:17 pm

### **Conversion therapy**

Conversion therapy is state sanctioned abuse and must be stopped. "Health" professionals and politicians alike should be held accountable for these crimes.

**Commenter:** Hannah E Freeman

3/20/19 12:18 pm

### **Conversion Therapy should be BANNED**

Conversion therapy is harmful for every person's sexuality. A mental health practitioner's job is to support the creation of a mentally healthy person. It is not to impose social values on a client. Period.

**Commenter:** K Schenker

3/20/19 12:21 pm

### **BAN CONVERSION THERAPY**

This treatment is outdated, and damaging ban it now

**Commenter:** Steven Marku

3/20/19 12:23 pm

### **Conversion Therapy is Child Abuse**

Conversion therapy has been debunked as ineffective, and inflicts psychological harm on those who undergo it. Those who perform this "therapy" on children should not be able to maintain their license in Virginia.

**Commenter:** Luke Mundo

3/20/19 12:46 pm

### **Ban Conversion Therapy**

Conversion therapy is not only ineffective, it is draconian, cruel, and essentially torture. It should not be practiced in Virginia or anywhere else.

**Commenter:** Jennifer Wiggins

3/20/19 12:50 pm

### **Unethical and harmful**

While parents should be free to raise their children as they see fit according to their personal values, children also deserve to be protected from misguided and harmful practices. Conversion therapy is just that, misguided and incredibly harmful. Virginia should ban this "therapy" as the vast majority of professionals advise against it.

**Commenter:** Dr. Kate Croson

3/20/19 12:52 pm

### **Conversion Therapy is harmful**

I am a licensed clinical psychologist. Conversion therapy and other sexual orientation change efforts (SOCE) are not clinically sound and no reputable peer reviewed study has found they are effective. They have, however, been strongly linked with low mood, trauma, suicidal ideation, and self-harm.

**Commenter:** Alisha Keirstead

3/20/19 1:08 pm

### **Please uphold the state's responsibility to ensure that care providers FIRST, DO NO HARM.**

To Whom It May Concern:

I am writing as a Virginia resident and voter, expressing my opinion as a constituent on the Virginia Department of Health Professions' consideration of restrictions on the practice of conversion therapy by licensed medical providers.

The State of Virginia holds a responsibility to uphold a basic, minimum standard of care for health care providers receiving state licenses. Fundamentally, these care providers must adhere to the Hippocratic Oath to first, do no harm. There are providers who continue to practice conversion therapy and do direct harm to the patients they purport to "treat" -- it is the State's responsibility to ensure that this potentially harmful practice does not continue.

My greatest concern is the delivery of conversion therapy to minors. Should adults with internalized homophobia wish to seek help for their attraction to same-sex, trans, or nonbinary individuals, I find it tragic but that is their right as consenting adults who can make informed decisions about their behavioral health care. However, in the case of minors -- a large proportion of individuals "treated" in conversion therapy programs -- this is either by force at the will of their parents/guardians, or because they have been heavily influenced by the homophobic views of their church or religious community to undergo conversion therapy. In these cases, young people either do not or cannot consent to undergoing this "treatment" -- it is the State's responsibility to ensure

that they do not suffer the psychological and emotional harm from forced or coerced attempts to deny their inherently expressed sexuality. This is fundamentally a child protection issue, and I hope the Department will take appropriate action to safeguard minors from the psychological harm that can be done by a clinician in conversion therapy to which a minor cannot independently consent.

**Commenter:** Jessica Camarena

3/20/19 1:09 pm

### **Ban Conversions Therapy**

Ban conversion therapy!!

**Commenter:** Rich Welshans

3/20/19 1:10 pm

### **Ban Conversion Therapy**

Conversion therapy has been debunked as a practice and actually causes harm to those who undergo it. Listen to the expert scientists and therapists rather than ideological zealots.

**Commenter:** Micah Morris

3/20/19 1:17 pm

### **I support the ban on conversion therapy**

I support the ban on conversion therapy. Conversion therapy is a relic of oppressive, antiquated, and de-humanizing thinking that says sexuality is a choice. Virginians deserve full freedom to love whoever they want to love, because freedom for one us means freedom for us all.

**Commenter:** Luke W. Priddy,

3/20/19 1:17 pm

### **Variance in Sexual Orientation is Not a Mental Disorder**

I am writing to support restrictions - and an outright ban - on sexual orientation conversion therapy in all forms in the Commonwealth: talk therapy, aversion therapy, methods of healing from homosexuality.

Conversion therapy is opposed by most major professional health and mental health organizations. In fact, scientific research has found that sexual orientation change efforts are detrimental to personal and public health.

Minors deserve special protections from abuse and other negative actions that put them at long-term risk of endangering themselves or others.

Last year, a group of young women were canvassing my neighborhood to raise money for a home for wayward teens. They were handing out testimonials of "success" stories from their graduates with quotes saying how the home helped them with issues like drinking, smoking, and addiction. One of the testimonials from a young woman said that the home had cured her from lesbianism.

I can only imagine the trauma this young girl suffered and will suffer the rest of her life as a result of sexual orientation conversion therapy.

Variance in sexual orientation is not a mental disorder. We need to support affirmative practices and stop looking at sexual orientation as something to be cured.

I serve as Vice-Chair of the LGBTQA Caucus of the Virginia Young Democrats, and Vice Chair for Membership of the LGBT Democrats of Virginia. Both of these organizations have long advocated for a ban on this harmful practice through the legislative process. We are hopeful that this important public health issue will now be addressed through the regulatory process.

Thank you.

Luke

**Commenter:** Brian Pace

3/20/19 1:18 pm

**Conversion therapy is a lie.**

Conversion therapy is a lie. Those that look to professionally push the idea that you can change your sexual orientation are lying, and hurting people with those lies.

Don't professionally enable people who lie.

It really is that simple, y'all.

**Commenter:** Mark Blacknell

3/20/19 1:22 pm

**Please follow the science**

You're getting a lot of feedback, most of it (?) BS. I would ask you to please step back and look at the scientific consensus on it. And please stop those who would harm our children because of some imaginary injunction against who they are.

We can be decent human beings. Please be a part of that, and not an obstacle.

Mark Blacknell

Arlington, VA

**Commenter:** MK Gregory

3/20/19 1:24 pm

**Ban Conversion Therapy**

Homosexuality is not a mental illness and conversion therapy is a dangerous practice at best, rooted in misinformation and fear. Please treat our homosexual youth with the kindness, love, and compassion they deserve.

**Commenter:** Vonni stamp

3/20/19 1:29 pm

**Ban conversion therapy**

Conversion therapy is a discredited tactic and should not be used ever again. It is inhumane and goes against the science of gender and sexuality.

3/20/19 1:34 pm

**Commenter:** Dolores Fitzgerald

**Please ban conversion therapy**

Please ban conversion therapy

**Commenter:** J Lamp

3/20/19 1:34 pm

**Conversion Therapy is Unethical**

I support the proposed guidance to penalize licensees and registrants that provide conversion therapy. When a person performs conversion therapy, they are knowingly causing lasting harm to a patient. This should be unconscionable to the Board of Psychology. This is a good step towards preventing psychological damage to LGBTQ Virginians.

**Commenter:** Patrick Healy

3/20/19 1:35 pm

**I support the ban on conversion therapy**

The practice of conversion therapy is morally unacceptable. In some places it allows parents and guardians to place minors into programs meant to 'cure', and 'treat' homosexuality as though it is a mental condition and not a trait. It traumatizes and damages some or many who are placed through it. It is based on baseless, unfounded claims that certain practices or regiments can "cure" homosexuality without any scientific evidence or medical support for doing so. Anything less than the total abolition of this repugnant and reprehensible practice would be an abject dismissal of our moral obligations to care for and love our fellow citizens, neighbors, and countrymen.

**Commenter:** Sue Kenny

3/20/19 1:38 pm

**Conversion Therapy**

BAN Conversion Therapy!

**Commenter:** P Arora

3/20/19 1:38 pm

**Ban conversion therapy**

Conversion therapy is unethical, dangerous, and harmful. It should be banned and any licensed therapist who practices it should lose their license and not be allowed to practice again. Therapists are meant to help people, not actively harm them.

**Commenter:** Victoria McGovern

3/20/19 1:42 pm

**BAN CONVERSION THERAPY**

Yes, I support the ban of conversion therapy and so should the state of Virginia. It's inhumane, traumatic, and abusive.

**Commenter:** Andrew W Smith

3/20/19 1:45 pm

**Support for Guidance Document 125-9, on the Practice of Conversion Therapy**

Dear Virginia Board of Psychology,

I write to request you to support **Guidance Document 125-9, on the Practice of Conversion Therapy**, which would protect youth under the age of 18 from so-called "conversion therapy" at the hands of licensed psychologists in Virginia.

I believe this form of "therapy" to be harmful and should not be allowed on young people. Please support the ban and protect those under the age of 18.

Respectfully,

Andrew Smith

**Commenter:** Ellen Rolan

3/20/19 1:48 pm

**Please ban conversion therapy**

Let individuals be themselves. There is nothing "wrong" about being LGBTQ. What is wrong is forcing a human to be someone they are not. Conversion therapy is simply inhumane and should be banned.

**Commenter:** L Kennedy

3/20/19 1:52 pm

**Ban conversion therapy.**

**Commenter:** Candace Gray

3/20/19 1:55 pm

**Ban Conversion Therapy**

Any and all professional psychologists/psychiatrists performing any type of conversion therapy should have their license to practice suspended - PERMANENTLY. Conversion Therapy is cruel, harmful and undoubtly a form of psychological warfare on the LGBTQ and trans community.

**Commenter:** Mary Knisley

3/20/19 1:59 pm

**Ban Conversion Therapy. Protect our Youth**

I urge Virginia to not only consider but to actually ban conversion therapy. The psychological harm done to our youth by subjecting them to intense "therapy" to try to change their sexuality is for all intents and purposes torture. Sexuality is something you are born with, it is not a choice, a mental illness or a condition that needs to be treated. Please protect our lgbtq children from this outdated, ineffective and cruel practice that has no purpose other than to humiliate, hurt and force ideology that is harmful to the victim of this practice. The suicide rate of our lgbtq community is too high and we need to focus on support for these brothers and sisters rather than rejection and harm.



**Commenter:** A Hendershot

3/20/19 2:04 pm

### **Parents don't have the right to harm their children**

Conversion "therapy" is not based in medical science. It is based on the false claim that sexual orientation is a mental illness and it leads to increased feelings of isolation and shame, increased rates of substance abuse and suicidal thoughts and attempts. Just as the State should protect children from unethical, harmful pseudoscientific medical treatments regardless of their parents' beliefs, it should protect LGBTQ youth from harmful treatments that have no basis in science. LGBTQ youth deserve to be affirmed and accepted by their parents, families, and communities, which the evidence shows results in improved mental health outcomes. Do not let parents and therapists subject their children to abusive, unscientific therapies under the guise of freedom from government overreach.

**Commenter:** Mary Williams

3/20/19 2:06 pm

### **Counselors**

Hi, I AM NOT IN FAVOR of REGULATIONS that deny counselors their free speech rights in counseling patients regarding gender. It is unconstitutional to allow only one sided therapy. People should be able to ask for and receive therapy without government telling them what they can and cannot discuss and receive treatment for.

Thank you

**Commenter:** Greg Mayyette

3/20/19 2:16 pm

### **Do not restrict freedom, do not restrict conversation therapy**

I believe that people who wish to try conversation therapy should be able to try conversion therapy. This is between an individual and his therapist. None of government's business.

**Commenter:** Graham Weinschenk, Virginia Young Democrats

3/20/19 2:19 pm

### **Ban Conversion Therapy**

I am writing to support restrictions - and an outright ban - on sexual orientation conversion therapy in the Commonwealth.

Conversion therapy is opposed by most major professional health and mental health organizations. In fact, scientific research has found that sexual orientation change efforts are detrimental to personal and public health.

Research from the University of San Francisco found that young people who experience "shame" because of their sexual orientation were:

8 times more likely to attempt suicide

6 times more likely to report high levels of depression

3 times more likely to use illegal drugs

Minors deserve special protections from abuse and other negative actions that put them at long-term risk of endangering themselves or others. Hence, the scientific evidence is clear that conversion therapy should be banned on minors.

I serve as Secretary of Virginia Young Democrats and our organization has long advocated for a ban on this harmful practice through the legislative process. We are hopeful that this important public health issue will now be addressed through the regulatory process.

Thank you.

**Commenter:** Lisa Fleming

3/20/19 2:29 pm

### **Ban Conversion Therapy**

These dangerous and discredited practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis. We need to use facts, not fallacy, in our decision-making process.

**Commenter:** Peggy Moore

3/20/19 2:31 pm

### **Ban Conversion « Therapy »**

Conversion therapy does nothing but shame people into try to be something they simply are not. Native American recognized multiple genders. It was Christianity that came along and decided people should be man or woman and straight only even though there are priets who sexually abuse little boys. Consenting adults should be able to live whatever life they wish without shame so long as no one is hurt. For the record, I am straight as are my relatives and I am 60 yrs old.

**Commenter:** Aleta E. Strickland, Ed.S., NCSP, Louisa Psychological Consulting, PC

3/20/19 2:34 pm

### **Protect our vulnerable youth and ban the abusive practice of "conversion therapy"**

"Conversion therapy" is not therapy at all but it is abuse. Every major mental health organization has taken a strong stance against this cruel practice. Any licensed practitioner claiming to use it is doing so unethically. As responsible adults and mental health practitioners, it is our responsibility to protect our clients and their families from junk science. I am pleased to see my licensing board taking a leadership role in our state to ban this horrific and damaging practice. I hope that anyone caught doing it is prosecuted for child abuse and loses their license.

**Commenter:** Lucy Dowell-Wiltshire

3/20/19 2:35 pm

### **Ban conversion therapy**

It is important to protect youth from so-called "conversion therapy," a dangerous and discredited practice aimed at changing their sexual orientation or gender identity. These practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis. This guidance protects young people from state-licensed therapists in Virginia who falsely claim to parents and youth that being

LGBTQ is a mental illness, and therefore taking advantage of parents and harming vulnerable youth. These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are.

These practices are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts. No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people.

**Commenter:** Kristina R Granger

3/20/19 2:38 pm

### **NO MORE conversion therapy!**

Conversion therapy is an extremely dangerous and discredited practice based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis. No practitioners should be able to practice a mental health therapy without any scientific basis and in fact the opposite, there is evidence of how detrimental and harmful this practice is. Would you allow parents and trusted adults to carry out any other practices on any other youth that were similarly deemed harmful that would lead to depression, suicide, etc.? Is bullying allowed? Then how is this not the most extreme medicalized version of bullying? Consider that.

**Commenter:** Sam Conlin, Virginia Tech

3/20/19 2:39 pm

### **Support for Conversion Therapy Ban**

I am writing to support a ban on Conversion Therapy. This "intervention" is not ethical and is only harmful and traumatizing for clients who are subjected to this method. This "therapy" does not let people express their identity and creates shame in a person. Conversion Therapy has negative consequences for clients and should be banned as ethical practice in counseling.

**Commenter:** Kathleen Mullen

3/20/19 2:46 pm

### **Conversion "Therapy" is Not a Legitimate Therapeutic Practice**

I am commenting in support of this guidance. This guidance protects young people from state-licensed therapists in Virginia who falsely claim to parents and youth that being LGBTQ is a mental illness, and therefore taking advantage of parents and harming vulnerable youth. These youth are already vulnerable and need protection.

These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are. They are also known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts.

No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people.

We can't allow one more young person to be targeted and hurt by these dangerous and discredited practices.

Thank you.

**Commenter:** Robert Steven Penczak

3/20/19 2:49 pm

**That we're even discussing conversion therapy in the 21st century is morally abhorrent**

As a humanist and a retired physician, I'm appalled to see the words 'conversion' and 'therapy' linked together, as if the barbaric practice of turning a person against themselves is somehow in that person's therapeutic interest. You will not find many scientists advocating on behalf of such torture. But you will find a whole lot of religious Fundamentalists who care neither for the Constitutional prohibition on fusing church and state nor for the welfare of our fellow human beings who will be traumatized and put at greater risk for dying by suicide if conversion 'therapy' - think psychological Inquisition - is allowed to go on. The State should criminalize attacks on gay people, not sanction them. Please ban conversion therapy now.

**Commenter:** J. Koch

3/20/19 2:57 pm

**Leave. People. Alone!**

"Conversion Therapy" is discredited pseudo-science that needs to be entirely disregarded by everyone. LGBT people need to be protected from this. \*Everyone\* needs to be protected from this kind of dangerous thinking. The fact that I even have to take time to comment about this to help protect my \*fellow HUMAN BEINGS\* from "Conversion Therapy" merits nothing but outrage...and voting.

Thank You.

**Commenter:** Hillary Embry

3/20/19 3:01 pm

**Conversation Therapy is dangerous**

Conversion therapy is abusive, particularly for children. The self harm rate of LGBT children is directly and positively impacted by a supportive environment. Conversion therapy often results in self harm or suicide. Often the "practitioners" of conversion therapy are not licensed in mental health. This would be a step backward for Virginia.

**Commenter:** Sean Timothy Maguire

3/20/19 3:05 pm

**What Do You Oppose?**

Board of Psychology,

I've spoken to you all about the proposed regulations and this proposed guidance document on the practice of Conversion Therapy before. I oppose the guidance document and the proposed regulations personally. As someone who is exclusively attracted to the same-sex - that is, as a man who is romantically and sexually attracted to other men - I have a personal interest in this discussion.

This proposed guidance document defines "conversion therapy" as "any practice" that seeks to change sexual orientation or seeks to change any behavior or reduce or eliminate any attractions. This includes talk therapy that supports certain positions.

What positions are opposed by this guidance document?

Does this guidance document oppose a small group that I was a part of in which we were encouraged not to engage in sexual practices with other men? Would that be understood as attempting to change behavior and therefore run afoul of this guidance document?

Anyone licensed under this Board would be guided by this document to avoid this kind of small group. Thus, this guidance document opposes the sexual ethics taught by Christianity, Judaism, Islam, and many other religions. My own religious convictions direct me to avoid sexual behavior with men. If these guidance documents are adopted, I would be prevented from receiving help in pursuing this religious conviction from anyone licensed under this Board.

Does this guidance document oppose the practice of reinforcing that men are not sexual objects, but are persons to be honored and respected as individuals? Would any effort to reinforce this view of men run afoul of this guidance document because it reduces sexual and romantic feelings?

Anyone licensed under this Board would be guided by this document to not counsel me to put aside my sexual desires for men and to pursue relationships that do not objectify them. Reducing sexual objectification is an effort to reduce sexual desires, and would run afoul of this guidance document.

This guidance document, as proposed, is opposed to the ethical teaching of many major religions. This guidance document, as proposed, is opposed to the principle that desires can be set aside to pursue a higher goal.

Ultimately this guidance document prevents any professional under this Board from upholding a common ethical principle of self-denial. Just because I want to do something doesn't mean that I should do it. I may want to have sex with men, but that doesn't mean that I should. As I already stated, my religious convictions dictate that I ought not to. Do you oppose my religious convictions?

Don't prohibit this viewpoint. Let me get help in putting aside my desires in order to pursue another goal.

Don't oppose the practice of supporting men like me in putting aside our deep sexual and romantic desires in order to pursue our deeper desires of faith. Let me be free to receive help from small groups and individuals licensed under this Board to do just that.

Respectfully,  
Sean Maguire

**Commenter:** Rachel Baker

3/20/19 3:11 pm

### **Conversion "Therapy" is Abuse**

Conversion therapy as a practice has been shown to cause damage to people subjected to it. That this practice is still legally allowed is abhorrent. That parents are allowed to force their children into this practice is sanctioned child abuse. No one, at any age, should be offered this harmful practice as "therapy," ever.

**Commenter:** J Thomas

3/20/19 3:19 pm

### **Ban conversion therapy**

Conversion therapy is abuse. Please ban its use.

**Commenter:** Leslie Rubio

3/20/19 3:34 pm

### **Conversion Torture**

STOP calling it therapy...it's torture and should never be treated or viewed as therapy. The idea that someone can "convert" their true identity is ludicrous! This should never be a practice that is accepted in our state nor should doctors (who are trained to heal) be allowed to practice this non-therapy.

**Commenter:** Angela P. Callahan, Serenity Counseling LLC

3/20/19 3:40 pm

### **Conversion Therapy is harmful**

If we as counselors, just like medical professionals, do our ethical duty in "First, Do No Harm", conversion therapy would be in direct violation of our ethical code, as we know CT to be extremely harmful to people who have been subjected to it by parents and others who felt they were trying to make a child's life better, but the opposite has occurred. If we attempt to deny a person's own thoughts and feelings, regardless of subject on things that cannot and should not be changed, and ignore the client's right to self-determination on continuing to believe themselves someone other than cisgender and straight, we are violating our ethics, and for this, we should be called upon by our Board of Counseling to submit to these allegations. If a client is not harming anyone, is acting healthily, legally, and is attempting to be affirmed in how they feel, our obligation as counselors is to validate and affirm, and to provide supportive resources to ensure that a client can have a sense of community. It is not a threat to free speech, as in our roles we aren't allowed to judge another person based on our own personal beliefs being in potential conflict with theirs. Counselors are here to serve, and no helping professional should ever subject a client to attempting to change them into someone they are not.

I am in support of the categorical ban to practice conversion therapy, and to make it a violation of our ethics and practice to use CT as a means of changing a person's affectual orientation and/or gender identity.

**Commenter:** Casey Pick, The Trevor Project

3/20/19 3:42 pm

### **The Trevor Project Supports Guidance Document 125-9**

The Trevor Project is proud to support Guidance Document 125-9, on the Practice of Conversion Therapy, which would protect youth under the age of 18 from so-called "conversion therapy" at the hands of licensed psychologists in Virginia.

The Trevor Project is the world's largest suicide prevention and crisis intervention organization for LGBTQ (Lesbian, Gay, Bisexual, Transgender, Queer, and Questioning) young people. We work every day to save young lives by providing support through free and confidential suicide prevention and crisis intervention programs on platforms where young people spend their time: our 24/7 phone lifeline, chat, text, and soon-to-come integrations with social media platforms. We also run TrevorSpace, the world's largest safe space social networking site for LGBTQ youth, and operate innovative education, research, and advocacy programs.

In the past year alone, The Trevor Project has been contacted by more than 2,500 young Virginians. Nationally, many of the young people that we serve are survivors of conversion therapy or have a credible fear that their family members will compel them to go through conversion

therapy. Supervisors for The Trevor Project's crisis services report that these issues come up regularly in conversation with youth coming to us for help, and as often as weekly. These impressions are borne out by data collected on TrevorLifeline, TrevorText, and TrevorChat, as our records show that since 2010 hundreds of contacts have reached out to The Trevor Project with specific concerns around this practice and terms like "conversion therapy," "reparative therapy," and "ex-gay" have appeared on our text-based platforms with disturbing frequency.

Some of these LGBTQ youth contact us because their parents are threatening to send them to conversion therapy. Others call us because they are in conversion therapy, it is not working, and their feelings of isolation and failure contribute to suicidal thoughts and behaviors. We've had youth reach out because friends or loved ones are being subjected to conversion therapy. And finally, young people have come to The Trevor Project in a state of profound distress because a someone they know has died by suicide during or after being subjected to conversion therapy.

The Trevor Project is invested in ending conversion therapy in every state because we know from experience and rigorous social science that conversion therapy contributes to an increased likelihood of suicide attempts among the youth we exist to serve. Recent research by The Family Acceptance Project has found that rates of attempted suicide by LGBT youth whose parents tried to change their sexual orientation were more than double (48%) the rate of LGBT youth who reported no such attempts to change their orientation (22%). Suicide attempts for LGBT young people who reported both home-based efforts to change their sexual orientation by parents and formal change efforts by therapists and/or religious leaders were three times higher (63%).

Far from being a relic of history, the practice of conversion therapy is active and ongoing in Virginia today. A 2018 study by the Williams Institute at the University of California, Los Angeles School of Law shows that nearly 700,000 LGBTQ adults have been subjected to conversion therapy, with 350,000 of them receiving the dangerous and discredited treatment as youth. That number grows by thousands each year as the Williams Institute estimates that nearly 57,000 LGBTQ youth will be subjected to conversion therapy in the next few years by either a religious or spiritual advisor. **An estimated 20,000 LGBT youth currently ages 13 to 17 will undergo conversion therapy from a licensed health care professional before the age of 18. These are the youth this guidance would protect.**

Virginia law already prohibits discredited and unsafe practices by licensed therapists. This guidance would prevent licensed mental health providers in Virginia from performing conversion therapy with a patient under 18 years of age – nothing more, nothing less. The guidance will curb harmful practices known to produce lifelong damage to those who are subjected to them and help ensure the health and safety of LGBTQ youth.

For these reasons and on behalf of the youth who depend upon our services, The Trevor Project strongly supports Guidance Document 125-9. Thank you for your consideration of this importance guidance.

**Commenter:** MARK STANLEY

3/20/19 3:43 pm

### **Ban conversion therapy**

Please ban the unscientific and harmful process of conversion therapy. This practice is psychologically damaging, serves no legitimate therapeutic purpose, and is based on the discredited notion that same sex attraction is a psychological disorder.

**Commenter:** Eileen Secrest

3/20/19 3:48 pm

### **Conversion therapy harms the patient**

I have never heard of a successful conversion therapy. I have, however, heard horror stories from people who were subjected to it. Patients are often shamed and humiliated, told they are bad and

horrible people, and told they choose their sexuality. They are told they are unnatural. Many of these "therapy sessions" have religious overtones where the patients are told they are going to hell for being bad. The practice of modern medicine should not include outdated, medieval torture sessions to try to force patients to conform to another person's standards. Gay people are productive members of society and merely being gay does not predict whether or not they will be a good or bad influence on others, whether or not they will be successful, or whether they will go to hell. This is a practice that merely helps parents feel better about their own selves, to let them say they have done what they can to prevent their child from being gay. The practice does not help the patient, and only does harm. It needs to be banned.

**Commenter:** Jessica Gray

3/20/19 3:49 pm

**This is brain washing.**

Being LGBTQ is not a choice, its how we were born, the only thing that makes it seem like a choice is society's negative view toward us. If there are any mental health issues in the LGBTQ community, they are caused by society thinking everybody should be like them and forcing them to be something they are not, I'm living proof. Accept your children for how they are and accept/ respect the rest of us and there wont be any mental health issues.

**Commenter:** Laura I ller

3/20/19 4:01 pm

**Sic Semper Tyrannis. Let Freedom of Therapy reign.**

Declaration of Rights-#2 Testimonials prove the need for Therapy:  
1.christianpost.com/news/grandmother-fighting-to-save-10-y-o-grandson-from-puberty-blockers-gender-transition-speaks-out.htm and 2. dailysignal.com/2019/03/10/i-was-americas-first-non-binary-person-it-was-all-a-sham/

**Commenter:** Allison Baker

3/20/19 4:04 pm

**Conversion therapy is not humane**

**Commenter:** Adrienne Schreiber

3/20/19 4:05 pm

**Conversion "Therapy" is WRONG**

The proposed ban will protect youth from so-called "conversion therapy," a dangerous and discredited practice aimed at changing their sexual orientation or gender identity. The science on this is irrefutably clear.

? These dangerous and discredited practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis.

? This guidance protects young people from state-licensed therapists in Virginia who falsely claim to parents and youth that being LGBTQ is a mental illness, and therefore taking advantage of parents and harming vulnerable youth.

? These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are.



? These practices are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts.

? No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people.

? We can't allow one more young person to be targeted and hurt by these dangerous and discredited practices.

**Commenter:** David Pratt, Indivisible Winchester

3/20/19 4:06 pm

### **Conversion Therapy is morally wrong**

Children should not be subjected to this potentially traumatic experience against their will. The science about homosexuality is clear. It is not a choice.

**Commenter:** Ann Granger

3/20/19 4:10 pm

### **Ban conversion "therapy"**

Please ban the practice of "conversion therapy" in Virginia. It is cruel, dehumanizing, and it doesn't work. I know this as the former wife of a gay man, and from conversations with other spouses of gay and lesbian people. I even recall a conversation I had with the wife of a man who was the director of a conversion therapy program in Virginia, a gay man himself. She confessed to me that gay people do not experience real "conversion" from the "therapy;" It is a constant daily struggle, she said. It doesn't work! Ban it!

**Commenter:** Chelsea Broderick

3/20/19 4:22 pm

### **Ban Conversion Therapy**

Please ban conversion therapy. It's abusive, discriminatory, leads to lifelong harm, and has absolutely no scientific basis. We need to protect LGBTQ+ youth from this horrific practice.

**Commenter:** EN

3/20/19 4:24 pm

### **Support for Conversion Therapy Ban**

A physician using their speech to try to persuade someone to live in a way that is not being harmful to themselves or others, is unethical. By trying to lift the ban on conversion therapy, it would endanger the lives of many clients. To try to convince someone that they are someone that they are not is unethical and dangerous.

**Commenter:** Jay Timmons

3/20/19 4:34 pm

### **Please ban so-called "conversion therapy" for those under 18**

I write in support of Guidance Document 125-9, which would ban so-called "conversion therapy" by licensed psychologists in Virginia for those under 18. Today, I am President and CEO of the National Association of Manufacturers, but I submit these comments not in that capacity but

as a citizen of the Commonwealth and former Chief of Staff for Governor George Allen, to advance the same principles that we promoted when in office: Free Enterprise, Competitiveness, Individual Liberty and Equal Opportunity. Allowing individuals to come to terms with their authentic selves, to live honestly and to not endure painful, often forced, efforts to break them of who they are and of what they feel will help our Commonwealth and all people strengthen these core pillars of an exceptional America.

As a gay man myself, I know this conclusion to be true. There was a time that I thought I could change who I was and would consider any methods to do so, or ignore this side of myself, from trusted mentors, counselors and spiritual advisors. I wanted to make my parents proud, and to see their dreams for me fulfilled. So, coming to terms with who I was had me wrestle with many doubts, great fears and tortured thoughts—to find a different way to live and feel.

In my formative years, I turned to my studies, work and public service to wall-off this side of me, hoping that somehow my feelings would evolve. Over the years, I came to terms with the truth that I could not change who I was created to be, and ought not to, bolstered by people in my life who encouraged me that the path of truth and authenticity was the only way to live—and to love. I have the benefit of looking at my husband, Rick Olson, and our 3 children, C.J., Ellie and Jacob today knowing that advice made my life whole.

Unfortunately, not everyone has the benefit from this support structure and not everyone has seen their true life come to term. So-called conversation therapy has robbed people of their lives and created a whole class of survivors who have struggled in the face of individuals telling them they are not normal, challenging their relationships with their parents and family and working to distort their minds and their feelings. As a current colleague had said in *The Washington Post* seven years ago: "Imagine routinely hearing from a so-called expert that your mother had harmed you and that your father had failed you, despite having two loving parents who sacrificed career pursuits and much else to see you realize your dreams. Think about subjecting yourself to shock therapy — the most awful pain — as your therapist showed you images of same-sex relationships in an effort to break you of your natural feelings." That colleague came close to ending his life. These impacts are why the medical community has concluded that conversion therapy does not work, and that it often harms people and families.

As a people who value life, each individual and every family, because of their intrinsic worth and because they strengthen those pillars that make our country great, we must commit to end this practice that targets those very foundations of our society. While we can, and must, respect the role of religious institutions and counselors in helping all individuals live better lives and confront the great questions of life, we cannot give state-sanction to a harmful practice that puts young people and other individuals at risk of death and limits so many individuals' potential to contribute to our families, our communities and our country.

I urge favorable action on Guidance Document 125-9.

**Commenter:** Josh Hetzler, Legislative Counsel at The Family Foundation

3/20/19 4:37 pm

### **Desist this Unlawful Prior Restraint on Speech**

I write to express The Family Foundation of Virginia's opposition to the Board of Psychology's proposed Guidance Document 125-9. Such guidance will not only cause numerous ethical and

moral harms to professionals, and developmental harms to children, but it is at odds with the laws of Virginia and the Constitution of the United States.

As a general matter, the Virginia Code expressly provides that parents, not the government and its regulatory agencies, have a “fundamental right to make decisions concerning the upbringing, education, and care of the parent's child.” Va. Code § 1-240.1 However, the effect of this Guidance Document would unduly limit the right of parents to make decisions concerning the upbringing, education, and care of their child by getting them the help they need and desire.

Virginia's constitution declares that “the right to be free from any governmental discrimination upon the basis of religious conviction . . . shall not be abridged[.]” Constitution of Virginia, Article 1, Section 11 (Bill of Rights). This Guidance Document would directly discriminate against Christian, Jewish, and Muslim health professionals who maintain, as a fundamental tenet of their faith, that human beings are created by God as either male or female and that human sexuality is only properly expressed between a man and a woman in the context of marriage. Such a conception of human sexuality reflects the historical, conventional, and orthodox views of these major faith traditions, and has transcended cultures and boundaries for millennia. Denying licensed psychologists through this policy the right to acknowledge this while acting in their professional capacity subjects them to “discrimination on the basis of religious conviction,” and thus runs afoul of one of Virginia's most basic constitutional guarantees.

The Board's policy as expressed in this proposed Guidance Document would also be unconstitutional in light of the U.S. Constitution because it would infringe on the free speech rights of professional counselors by prohibiting them from speaking certain messages (or, if not strictly prohibiting it, then by significantly “chilling” their free speech). In 2018, the U.S. Supreme Court rejected the state of California's claim that “professional speech” receives less First Amendment protection than ordinary speech, stating that: “This Court has not recognized ‘professional speech’ as a separate category of speech. Speech is not unprotected merely because it is uttered by ‘professionals.’” National Institute of Family and Life Advocates (NIFLA) v. Becerra, 138 S. Ct. 2361, 2371-72 (2018).

The Supreme Court's opinion highlighted three cases – two of which involved state bans on so-called “conversion therapy” for minors – as being erroneously decided for holding that counseling was afforded less constitutional protection as a matter of free speech. As a result, the lower court cases upholding bans on “conversion therapy” were effectively overruled. Because this policy would have the direct and immediate effect of silencing the protected speech of health professionals in Virginia, it would not likely survive a legal challenge. If this Board does go forward with such a violation of free speech, it should expect a legal challenge.

Effectively prohibiting the practice of so-called “conversion therapy” among licensed psychologists, as the draft Guidance Document defines that term, goes too far in its attempt to address the hypothetical concerns some have raised. (It is worth noting that no known complaints have ever been received by any of the health regulatory boards concerning “conversion therapy.”) As the term is now broadly and vaguely defined, it “compels individuals to contradict their most deeply held beliefs, beliefs grounded in basic philosophical, ethical, or religious precepts, or all of these.” NIFLA v. Becerra, 138 S. Ct. 2361, 2379 (Kennedy, J., concurring). That is something this Board may not do.

The Supreme Court in NIFLA cautioned that “when the government polices the content of professional speech, it can fail to ‘preserve an uninhibited marketplace of ideas in which truth will ultimately prevail.’” Id. at 2374 (quoting McCullen v. Coakley, 134 S. Ct. 2518, 2529 (2014)). There are significant disagreements about the merit of therapies which help a young person resolve, in some cases by reversing, their unwanted sexual attractions or gender confusion. These disagreements should be settled in the marketplace of ideas and according to the wishes of the minor and his or her parents. The effect of this regulation, however, would only be to silence unpopular ideas and suppress information.

We urge this Board to heed the U.S. Supreme Court's words when it observed that “the best test of truth is the power of the thought to get itself accepted in the competition of the market’ and the

people lose when the government is the one deciding which ideas should prevail.” Id. at 2375 (quoting Abrams v. United States, 250 U.S. 616, 630 (1919) (Holmes, J., dissenting)).

**Commenter:** Kimberly Phillips

3/20/19 4:40 pm

### **Please Ban Conversion Therapy**

Conversion therapy is nothing more than mental torture to for kind loving people to basically commit fraud upon others. Why any person would want to harm another that was is just cruel. Life is hard enough without the PTSD of being torture by professionals who are supposed to help you. There is no place in a Christian society of Conversion torture.

**Commenter:** Rev. Seth Wispelwey, United Church of Christ

3/20/19 4:46 pm

### **Anti-queer policies and practices harm and kill. Ban conversion therapy.**

We transform lives, our communities, and our world through open and affirming love. Conversion therapy runs counter to this transformation - it is a desecration and destruction of who and how people are created to be, integrated within and without. The science is in and the real costs of ignoring it come thick and fast with the exponentially higher self-harm/suicide rates of queer youth who have been rejected for who they are and subjected to conversion therapy. Do the right thing - holding you all in the light as you choose to do so.

Rev. Seth Wispelwey

he/him/his

**Conversion therapy** is the pseudoscientific practice of trying to change an individual's sexual orientation from homosexual or bisexual to heterosexual using psychological or spiritual interventions. There is virtually no reliable evidence that sexual orientation can be changed and medical bodies warn that conversion therapy practices are ineffective and potentially harmful.

**Commenter:** Todd Gathje, Ph.D., The Family Foundation

3/20/19 4:57 pm

### **Don't Prohibit Biologically Affirming Counseling**

Dear Virginia Board of Psychology,

The Family Foundation of Virginia urges the Board to reject the draft “Guidance Document on the Practice of Conversion Therapy (125-9).” This policy would generate severe consequences for both patients and counselors.

#### **Denies Services Desired by Patients**

The Guidance Document and any proposed regulations would prevent children and adolescents from being able to receive the proper and desired care they need to relieve them of any distress from *unwanted* same-sex attractions or gender dysphoria, which could lead to severe outcomes, including bodily harm. Prohibitions on talk therapies – which this Document effectively creates – would prevent minors from receiving the guidance they seek by preventing licensed professionals from recognizing their minor client’s right to control the goals and direction of his or her life.

Furthermore, the policy appears to imply that all children are sufficiently mature and autonomous to determine, permanently and without question, both their gender and sexual identification. If that is so, then it must be equally true that they are sufficiently mature and autonomous to consent to receiving guidance to overcome unwanted feelings or confusion about these same matters. The

very essence of the guidance document would prevent counselors from fulfilling their ethical duty to respect patient autonomy.

### **Usurps Parental Rights**

The Guidance document would be in direct conflict with Virginia law, which makes clear that parents, not the government and its regulatory agencies, have a “fundamental right to make decisions concerning the upbringing, education, and care of the parent’s child” (§ 1-240.1 of the *Code of Virginia*). This includes seeking the most viable form of treatment.

### **Violates Counselor Free Speech**

Furthermore, the Guidance Document and any proposed regulations would violate the free speech rights of licensed medical professionals by employing viewpoint-based restrictions on speech, or more commonly “viewpoint discrimination.” Illegitimate viewpoint discrimination is clearly evident in the draft regulation before this workgroup. While psychologists would be free to support and encourage patients to explore their sexuality in various ways, even to the point of undergoing physical bodily changes, they are simultaneously prohibited from encouraging and supporting a person to affirm and embrace natural sexual expressions and in the physical body they were born in. Under this proposed policy, those who do will face state-imposed loss of their professional license.

Professional psychologists/counselors likewise have a duty to deal truthfully with their minor clients. This surely encompasses life’s most fundamental truths, such as the known biological (as well as non-biological) differences between males and females. For licensed professionals who acknowledge these truths, being compelled to repress them when in contact with a minor client would inevitably create for them real ethical dilemmas.

### **Contradicts the General Assembly**

While administrative agencies can promulgate rules and policies to carry out duties delegated by the General Assembly, they cannot do so outside the statutory parameters established by it. In fact, the General Assembly has specifically and repeatedly rejected proposed bans on so-called “conversion therapy” for numerous years, and as recently as 2018 (HB 363, Delegate Hope; SB 245 Senator Surovell) through the committee process.

This proposed Guidance Document, therefore, is clearly an administrative action in direct contravention of the will and intentions of the General Assembly.

For these reasons, The Family Foundation urges this Board to reject any Guidance Document or regulatory language that places undue restrictions on licensed mental health professionals by preventing them from providing the care that that their patients desire and need.

**Commenter:** Stephen Jones

3/20/19 5:05 pm

### **No conversion therapy**

Ban conversion therapy, not people!

**Commenter:** Donna Cywinski

3/20/19 5:21 pm

### **Conversion Therapy is Medical Malpractice**

I am opposed to any regulation that would give sanction to conversion therapy. The medical evidence is clear that conversion therapy is psychological abuse. No child or adult should be forced to endure conversion therapy.

**Commenter:** Sojourna Cunningham

3/20/19 5:21 pm

### **Ban Conversion Therapy**

Countless studies have demonstrated that conversion therapy contributes to loss of life and demonstrable harm. Please do the right thing and ban conversion therapy.

**Commenter:** Chris Fury, DPVA Central Committee Member

3/20/19 5:27 pm

### **Conversion Therapy is Horrible**

Conversion Therapy that intends to change a person's sexual orientation doesn't work, and instead causes significantly higher rates of depression and suicide. This is unacceptable and should be prohibited. People should be allowed to love who they want to love how they want to love them, as long as it is mutual. It is not for others to decide how any couple should live, or who they should love.

**Commenter:** Dan Edwards, Ph.D.

3/20/19 5:37 pm

### **Conversion Therapy is Harmful -- and Antithetical to the Hippocratic Oath**

I've worked with vulnerable children, youth, and families my entire career -- first in the classroom and then as a clinical psychologist. Having known many healthy gay youth struggling to make it through a difficult period (called adolescence) -- I can say unequivocally that so-called "Conversion Therapy" is unethical, harmful, and dangerous. As such -- especially given the rise in suicide rates statewide -- it should be banned in the Commonwealth of Virginia.

"Conversion Therapy" attempts to teach gay youth that their feelings regarding sexual orientation are 'abnormal' and that their innate sexuality is sinful and wrong. And when it doesn't work, youth are left feeling even worse about themselves. As impressionable youth they need to hear messages of empowerment and confirmation not threats and abuse -- which happens typically because they've just been subjected to complete strangers who've told them they MUST change. Many teens succumb to the pressure, and the personal battle ends in suicide.

For those teens who are strong enough to pull through once "Conversion Therapy" treatment ends, they're saddled with the weight of self-hatred, depression and deteriorated family relationships. For a teenager in some of their most formative years, this type of emotional trauma can be devastating. They emerge with horror stories and flashbacks akin to members of the military with PTSD. No teen should be subjected to this. No parent should believe that this type of "therapy" actually works. (Parents need to understand that if they subject their child to this, it could forever end your relationship with them or worse; it could end their life by suicide.)

What gay teens need most is support and love. They need to be surrounded with people who can help them come to terms with their sexuality and continue loving themselves. They don't need to have messages of self-hate reinforced by strangers. They don't need to live in an environment that makes them feel like outsiders. Being a teen is hard enough. "Conversion Therapy" makes teen life insufferable. For many teens, it's the final straw. Offering a "Therapy" that puts at-risk youth at further risk of suicide -- is simply unconscionable. And inconsistent with the Oath of Hippocrates which states "First Do No Harm."

Dan Edwards

Alexandria, VA

**Commenter:** Herschell Emery, First Congregational Church, Chesterfield VA

3/20/19 5:52 pm

**Please support our LGBTQ neighbors & friends with a forceful BAN on this 'therapy'!**

Neither science, nor morality supports viewing LGBTQ folks as needing to be 'cured' of who they were born to be, of whom they naturally love. Letting called 'conversion therapy' be legal, even if it worked (which it doesn't), fuels the bigotry that sees being different sexually as a bad thing that unaccepting Virginians can fight against. Our state is better than this, and must show it.

**Commenter:** G - Former Conversion Therapy Victim

3/20/19 5:59 pm

**Ban Conversion Therapy**

As a 15 year old I was placed in a conversion therapy program as reparation for my 'sins', it failed. It was pure torture and hell. It was the will of my parents and a sham health care religious 'professional' Now as an adult, I have been able to work through the damage done. It was nothing more than a life altering painful period of time that has driven me away from my family and from that religious portion of people.

Conversion therapy is a dangerous and discredited practice. According to the American Psychiatric Association, "the potential risks of reparative therapy are great, including depression, anxiety and self-destructive behavior, since therapist alignment with societal prejudices against homosexuality may reinforce self-hatred already experienced by the patient." The Pan American Health Organization says that conversion therapy "lack[s] medical justification and represent[s] a serious threat to the health and well-being of affected people." Conversion therapy causes significant harm to vulnerable youth and it is antithetical to the values of our great Commonwealth.

**Commenter:** David Sforza

3/20/19 5:59 pm

**Back Science, Not Fantasy**

Do not punish licensed counselors for helping patients overcome their unwanted sexual feelings by affirming biological realities concerning males and females. What you are planning to do is put in jeopardy the professional license of these counselors simply for holding to the natural, biological, historical and/or Biblical understanding of human sexuality. When did WE the voters get an opportunity to make our voice heard on this subject? Outside of this forum there has been no state-wide referendum. From where do you get your authority to impose YOUR will on us?

**Commenter:** Allison Finseth

3/20/19 6:01 pm

**Conversion therapy is dangerous**

So-called "conversion therapy" is a dangerous and discredited practice based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis. These practices are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts.

This guidance protects young people from state-licensed therapists in Virginia who falsely claim to parents and youth that being LGBTQ is a mental illness, and therefore taking advantage of parents and harming vulnerable youth. These harmful practices use rejection, shame, and psychological

abuse to force young people to try and change who they are. No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people.

**Commenter:** Chrystal Doyle, RN and Family NP Student

3/20/19 6:05 pm

### **Conversion Therapy is NOT a free speech issue - it is harmful**

Apparently members of the Family Foundation are sharing the same talking points by arguing that restraints on "conversion therapy" limit free speech. Such claims are false. Medical and psychiatric care is not free speech and there is strong precedent for guidance in healthcare and legislation about what is safe for minors (i.e., sexual relations with a minor=not okay; child labor=not okay; abuse=not okay; failure to vaccinate=not okay; giving breast milk of an HIV infected person to a baby=not okay; giving drugs to children=not okay; cigarettes and vaping in children=not okay). Parents cannot make any medical decision they want for their child and health providers are limited in what they can do to and for a child--they do NOT have to do what a parent requests if it will harm a child. There are many things we used to do in healthcare that we no longer do--things we now know are unhealthy or cause harm...or other things we know are healthy and provide benefit. Laws and practices change to reflect new knowledge about biology and human beings and behavior. We now know, for instance, that gender identity and sexual orientation are not black and white. Complicated hormones control identity and orientation and our born sexual organs may or may not match our hormones. We now know that "gay" is not a choice. It is not nature versus nurture. it is wholly nature. Whether one is allowed to comfortably and healthily express one's gender identity is nurture. Conversion therapy is about the latter. It attempts to change something that need not be change--that CANNOT be changed. Parents are not allowed to harm their children--they may not physically, verbally, or emotionally abuse them. It happens but it is good governance to protect vulnerable populations from abuse and we have the opportunity to do so by BANNING CONVERSION THERAPY IN MINORS. If consenting adults wish to pursue alternative therapies that are not considered in good health, then that is their right, but it is not the right of parents to harm their children by denying their gender identity, healthy expression of that identity, and dictate with whom they may enter into a healthy, lawful relationship.

**Commenter:** R.Dowty

3/20/19 6:06 pm

### **Problems with banning conversion therapy**

I have two issues with the banning of conversion therapy:

Firstly, I remember reading stories of people that went thru the therapy and stated that it helped them live the satisfying lives that they already wanted to live. In at least one case, a man who had been a practicing homosexual ended up marrying (to a former lesbian, no less!) and beng a father. If it helps even one person be what he/she be what he/she wants to be it should not be banned.

Banning the therapy is potentially a violation of free speech.

( re:<https://www.washingtonpost.com/religion/2019/02/02/judge-says-tampa-conversion-therapy-ban-violates-first-amendment-free-speech-rights/>)

**Commenter:** Suzanne Greenwald

3/20/19 6:13 pm

**Conversion therapy is abusive! No sane, humane, or competent therapist would perform it.**



**Commenter:** Julie Palian

3/20/19 6:13 pm

**Conversion Therapy is cruel and dangerous for kids.**

I hope I am good enough at raising my children that I help them become their best selves rather than some warped projection of what I want them to be. Conversion therapy is a pitiful attempt to make young people change that only results in a message that they are bad for being who they are. Love your child unconditionally. Stop listening to judgements and connect with the person you were trusted to raise in a loving environment.

**Commenter:** Michelle Black

3/20/19 6:14 pm

**Conversion therapy is dangerous and inhumane.**

"Conversion therapy" is wishful thinking, not medicine. It has been shown to be not only ineffective, but detrimental to the health and well being of the "patient." There is nothing wrong with same sex attraction or being transgender. Conversion therapy is a misguided (at best) attempt to force people to conform to heteronormativity, and must end. It is malpractice and must be banned.

**Commenter:** Evan Lee

3/20/19 6:20 pm

**Don't let loud voices for cruelty drown out broad scientific consensus and compassion.**

Not all 'research' nor opinions should carry equivalent weight. There is a massive disparity in what the lobbyists and questionable institutions provide as justification for 'conversion therapy' and what the current best understanding based on our best efforts as a species to understand reality point towards, and I'm glad to see that on this issue Virginia is deciding to side with the latter. There is no compelling argument towards better quality of life for individuals nor benefit to society from 'conversion therapy', and ample evidence of deleterious effects on the individual, community, and broader society scales for the damage that they do. There's nothing to be gained by attempting to change our citizens' orientations, and even if there were it would have to be incredibly compelling to justify the known abusive processes employed in that effort. Ban conversion therapy. Make such bans have teeth that make those who'd abuse others in pursuit of their toxic ideology know it's not worth it. Not in our community, not in our world. Thank you for your time.

**Commenter:** Catherine Dufault

3/20/19 6:23 pm

**Conversion therapy is a human rights violation**

Conversion therapy is pseudoscientific and ineffective. Homosexuality is no longer considered a disorder of mental health and therefore the "therapeutic" aspect of conversion practices is void. The practice targets minorities and children. It has been shown to be ineffective in its goal and to increase suicidal ideation as well as trauma in subjects.

**Commenter:** Caroline Wade

3/20/19 6:25 pm

**Ban conversion therapy**

Conversion therapy is widely acknowledged to be a dangerous practice that does nothing but encourage self hatred and psychological harm among LGBTQ+ people, particularly young folks. To merely "regulate" this discredited pseudoscience would be both a moral and scientific failing; Virginia should immediately join the 15 other states that have banned conversion therapy outright as a show of belief in science and support for LGBTQ+ Virginians like me.

**Commenter:** Douglas P Reimel

3/20/19 6:27 pm

### **Ban so-called "conversion therapy"**

As a previous long-time resident of Virginia from 1995 to 2010, I personally knew several friends who were both voluntarily AND involuntarily subjected to this practice, while living there. My friends ranged in age from upper teens to lower 40's. Regardless of their age, the result was always the same--failure and long-term psychological damage.

This therapy attempts to change something innate and biological, and there is neither scientific basis that validates the effectiveness of such therapy, nor is there any valid evidence that refutes the damage it causes to innocent people. This type of treatment is a cover for hateful or bigoted attitudes and inflicts real harm on individuals who experience it--often young people who are forced into such programs.

There is a reason major medical and psychological associations recommend banning it, because it overtly harms people and drives them into unhealthy psychological anguish and even can result in attempted suicides (in the case of my friends).

Do Virginia a huge favor, and join other states in banning this barbaric "therapy."

**Commenter:** Megan Challender

3/20/19 6:27 pm

### **Conversion therapy is unethical and abusive**

Conversion Therapy is Child Abuse And I would support legislation allowing victims of this child abuse to sue their abusers for damages, which would include compensation for therapy for post-traumatic stress and other harms. Rely on the science. To force children -- or really anyone -- against their will to do something that is impossible is, ipso facto, traumatizing. The torture can be physical, mental, emotional, or psychological. But torture it is. And any clinician who does so should not only lose their license but should also suffer civil penalties (and criminal ones, if physical torture is used).

**Commenter:** Mary Ann Suddarth

3/20/19 6:35 pm

### **Conversion therapy can be helpful**

Some counselors believe conversion therapy can help. It is not 'settled science.' If someone wants to change their same sex attraction then denying them the help of a licensed counselor can be harmful to them if they are forced to do it alone. Also most juveniles grow out of that attraction and to imply that they can't can be very harmful to them.

**Commenter:** S. Morris

3/20/19 6:41 pm

### **Please Ban Conversion Therapy**

**Commenter:** D. George

3/20/19 6:45 pm

**Conversion therapy is harmful and inhumane.**

This guidance will protect youth from so-called “conversion therapy,” a dangerous and discredited practice aimed at changing their sexual orientation or gender identity. These dangerous and discredited practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis.

I urge you to protect our kids from dangerous methods such as this. To be LGBTQ is not some sort of disease, it's who people are.

**Commenter:** Lara Adcock

3/20/19 6:50 pm

**Ban cover soon therapy**

These dangerous and discredited practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis. There is no place for this abusive practice in our state. Protect our children.

**Commenter:** Mickey Drummond

3/20/19 6:54 pm

**Please ban conversion therapy**

Please ban this outdated and dangerous “therapy”

**Commenter:** Debbie Berg, RD, CDE

3/20/19 6:58 pm

**conversion therapy**

Counseling on conversion therapy is responsible practice. To deny knowledge on a major life-altering procedure that has significant physical and potentially psychological impact on a human being is malpractice. Controlling the actions of a licensed health professional in good standing should not be part of the VA legislators role.

**Commenter:** Johnny Jones

3/20/19 6:59 pm

**please ban this harmful conversion therapy.**

**Commenter:** Donna Burgess

3/20/19 7:01 pm

**DonnaRBurgess@gmail.com**

Conversion “therapy” is not therapy. It is harmful and should be banned!

**Commenter:** Katherine Helm

3/20/19 7:04 pm

**Ban Conversion Therapy!**

We must protect children from violent homophobic parents. Ban Conversion Therapy! No one should be able to lock up their child to be tortured for any reason! No legitimate doctor would condone this pseudo-science! Ban conversion therapy now and forever!

**Commenter:** Elissa

3/20/19 7:08 pm

**Ban conversion therapy!!!!**

**Commenter:** Michelle Randall

3/20/19 7:09 pm

**Conversion "Therapy" is Abuse!**

Conversion "therapy" is dangerous and not grounded in any scientific finding. It is based on shame and rejection and targets vulnerable youth and their parents. It is tantamount to emotional and psychological abuse.

**Commenter:** J.Bar

3/20/19 7:11 pm

**Homosexuality is not a DSM diagnosis**

Conversion therapy has been proven time and again not only to be ineffective, but to have an approximate 40% suicide rate in patients. That alone makes this practice extremely unethical. Homosexuality has not been considered a mental disorder since the 70s, and to insist that it is a disorder to be treated instead of the natural variation it is, is a cruel practice. To normalize conversion therapy and insist it is somehow an actual treatment for anything is setting people up to have unreasonable expectations, and reinforce the idea that LGBT folks are sick. Societally that is dangerous.

**Commenter:** Cory Gerwe , LGBT Life center

3/20/19 7:14 pm

**Conversion Therapy is Egregious**

**Commenter:** Courtney

3/20/19 7:25 pm

**Conversion therapy is torture, and a shameful thing to have on this earth!**

Conversion therapy is flat out one of the cruelest forms of torture! Children who prefer other sexes should not be tortured for something that is part of who they are, and how they were born! Anyone advocating for it, trying to legislate to make it lawful, or even considers it, etc. is morally reprehensible, and should be made to go through a round or two of it themselves!

**Commenter:** Ann Moscato

3/20/19 7:32 pm

**Ban conversion therapy!**

Conversion therapy has no basis in science, it was made up by people who were scared of other people who may be different from them. Mental illnesses like anxiety, depression, bipolar disorders etc. are actual mental illness, being gay is not. Being a member of the LGBTQ community does not make you harmful to yourself or others, there. Is nothing to cure.

**Commenter:** Geneva Cleveland

3/20/19 7:33 pm

**No to conversion therapy**

Healthcare providers are ethically bound to serve the needs of their patients and provide care based on the best available evidence. Conversation therapy has been thoroughly debunked in terms of efficacy and has actually been found to swing so far in the other direction into directly harming patients. Knowingly providing substandard care is bad enough but providing care known to be harmful is an egregious breach of medical ethics. If a provider does not feel comfortable delivering care that meets standards of best practices, all they have to do is make a referral to a provider who is competent in LGBT care. In fact, they are ethically bound to do so. Patients do not seek care to be at the mercy of a provider's personal beliefs. They come to get help with the expectation that they will be treated with dignity and respect.

**Commenter:** Elizabeth Williams

3/20/19 7:36 pm

**Ban conversion therapy**

Please ban conversion therapy. Therapy isn't even the proper word that should be used. Therapy describes a treatment that is actually helpful. Conversion therapy has proven time and time again to not be beneficial but it actually causes more harm than good.

**Commenter:** P.Wright

3/20/19 7:43 pm

**Ban it!**

Ban conversion therapy!

**Commenter:** Liza Cobbs

3/20/19 7:44 pm

**Ban Conversion "therapy"**

? These dangerous and discredited practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis.

? These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are.

? These practices are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts.

? No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people.

? We can't allow one more young person to be targeted and hurt by these dangerous and discredited practices.

**Commenter:** Matt

3/20/19 7:49 pm

**It is not Conversion Therapy - It is affirming biological realities concerning Male and Female**

**Just because it's popular doesn't mean it's right. Slavery was protected by the courts at one time too. Do not punish licensed counselors for helping patients overcome their unwanted sexual feelings by affirming biological realities concerning male and female.**

**Commenter:** Katie Richter

3/20/19 7:53 pm

**Ban Conversion Therapy**

Conversion Therapy is Child Abuse

And I would support legislation allowing victims of this child abuse to sue their abusers for damages, which would include compensation for therapy for post-traumatic stress and other harms.

Rely on the science. To force children -- or really anyone -- against their will to do something that is impossible is, ipso facto, traumatizing.

The torture can be physical, mental, emotional, or psychological. But torture it is. And any clinician who does so should not only lose their license but should also suffer civil penalties (and criminal ones, if physical torture is used).

**Commenter:** June Keller

3/20/19 7:53 pm

**Protect kids from conversion "therapy"**

? Conversion therapy wouldn't turn a straight person gay, so why in the world would any idiot think that it would turn a gay person straight? It's just a way for homophobes to hurt people. It should absolutely be illegal. It's definitely unethical and immoral.

? This guidance will protect youth from so-called "conversion therapy," a dangerous and discredited practice aimed at changing their sexual orientation or gender identity.

? These dangerous and discredited practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis.

? This guidance protects young people from state-licensed therapists in Virginia who falsely claim to parents and youth that being LGBTQ is a mental illness, and therefore taking advantage of parents and harming vulnerable youth.

? These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are.

? These practices are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts.

? No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people.

? We can't allow one more young person to be targeted and hurt by these dangerous and discredited practices.

**Commenter:** Damia Browder

3/20/19 7:56 pm

### **Absolutely no to conversion therapy**

Conversion therapy is abuse! No therapist or Psychologist should be allowed to perpetrate this abuse on innocent children or adults. There is absolutely no research or data. That suggests that conversion therapy is remotely possible except that in that it shames individuals to the point that they bury their true nature in order to conform.

**Commenter:** Deplorable NOVA

3/20/19 7:56 pm

### **Don't punish counselors**

**Please don't punish licensed counselors for helping patients overcome their unwanted sexual feelings by affirming biological realities concerning male and female.**

**Commenter:** Michelle Bayliss

3/20/19 7:59 pm

### **Conversion therapy is cruel and psychologically damages children.**

Conversion therapy has been shown time and time again to be dangerous to young psyches, breaking them and causing irreparable damage to their self-worth. We should love our young people, accept them. Conversion therapy is the opposite of that, telling children something is wrong with them, they are worthless unless it is 'fixed,' that they will never find happiness as long as they aren't 'right.' I don't care who you are, that's cruel to teach anyone. I implore you to ban this practice as it directly harms the already fragile psychological states of kids just trying to figure out who they are.

**Commenter:** Wendy Baird , MSW

3/20/19 8:03 pm

**Please ban conversion therapy and help save teens' lives.**

**Commenter:** Neelam Ahmed

3/20/19 8:10 pm

**Ban conversion therapy! First do no harm!**

**Commenter:** Anna K

3/20/19 8:12 pm

### **Ban conversion therapy**

I agree with Delegate Mark Levine's comments. Please ban conversion therapy. It is child abuse and I believe any child forced into conversion therapy should be able to sue their parents. Abk

**Commenter:** Mary Lib Morgan

3/20/19 8:13 pm

### **NO to Conversion Therapy**

In researching prior to entering a comment, I read multiple sources citing that all major science-based mental health and medical organizations have long called for a ban of conversion therapy practices. Conversion therapy has been identified as ineffective and harmful to its clients in science-based research. It has been causative and correlative in suicide attempts and completions. Those facts alone should be sufficient to convince legislators of the need to ban these practices in Virginia.

Please consider this, in addition. Like many other lifelong Christians, I often heard the phrase "God doesn't make mistakes". When pre-adolescents and adolescents identify as LGBT

**Commenter:** Charles Bright

3/20/19 8:13 pm

### **Support for Guidance Document 125-9**

I am writing to voice my support for Guidance Document 125-9 for guidelines pertaining to the practice of reparative therapy on minors. Repeated studies have shown that efforts to suppress or "cure" a young person that is LGBT+ Are extremely harmful on many levels. Psychologists that are licensed in the commonwealth should absolutely face disciplinary measures if they engage in or encourage this horrendous practice with their young patients. I applaud the Board for taking these steps to protect Virginia's vulnerable youth from what is essentially child abuse.

**Commenter:** Michelle Sams, LCSW

3/20/19 8:18 pm

### **Ban conversion therapy**

Ban conversion therapy.

**Commenter:** Catherine Calletto

3/20/19 8:20 pm

### **Ban Conversion Therapy**

Conversion Therapy is not humane or ethical, especially for youth who do not have the developmental capacity and/or autonomy to make their own choices knowing they may be forced to live on their own if they choose to do something contrary to their guardian's wishes. LGBTQ people are not mentally ill or defective and therefore do not require these harmful, concerted attempts to "convert" them. Conversion "therapy" is not in line with any current evidenced-based practices or research and therefore should be banned.



**Commenter:** Christina Gateley

3/20/19 8:30 pm

**Conversion Therapy needs to be banned.**

Our LGBT youth should be protected. Conversion therapy is cruel and leads to suicide/attempted suicide by too many of its participants. Ban it now

**Commenter:** Rachel Kubin

3/20/19 8:43 pm

**Ban Conversion Therapy**

Conversion therapy is a guise for abuse and torture. Homosexuality is not a mental disease that needs to be resolved via therapy. Please ban conversion therapy.

Kind Regards,

Rachel Kubin

**Commenter:** Chris Morse McClure, Life Transitions Counseling

3/20/19 8:47 pm

**Please ban Conversion "Therapy"**

I am in support of the categorical ban to practice conversion therapy, and to make it a violation of our ethics and practice to use CT as a means of changing a person's affectual orientation and/or gender identity. So-called "Conversion Therapy" is unethical, harmful, and dangerous. As such -- especially given the rise in suicide rates statewide -- it should be banned in the Commonwealth of Virginia.

These dangerous and discredited practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis.

Let us protect young people from therapists in Virginia who falsely claim to parents and youth that being LGBTQ is a mental illness, and therefore taking advantage of parents and harming vulnerable youth.

These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are.

These practices are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts.

Young people should never be shamed by a mental health professional into thinking that who they are is wrong.

Let's NOT allow one more young person to be targeted and hurt by these dangerous and discredited practices.

**Commenter:** Jon Margolick

3/20/19 8:48 pm

**Why would this ever be legal?**

There's no evidence it works. There's overwhelming evidence it hurts people. And if it stands for anything, it's that certain kinds of people aren't and shouldn't be welcome. Does that sound like who we want to be?

Please ban gender conversion therapy immediately.

**Commenter:** Tracy Hundley

3/20/19 8:51 pm

**gender therapies**

Guidelines shouldnt restrict faith-based options. Governments role is to ensure full disclosure of what treatments involve - this should apply to all licensing situations. I do not favor a ban on a therapy but I do support criminal charges being filed if actual harm is done to someone... thats true of all licensing situations.

**Commenter:** Nichole Hayes, New Leaders Council Virginia

3/20/19 8:53 pm

**End this dangerous practice and ban conversion therapy.**

**Commenter:** Arlene Butler, LCSW

3/20/19 8:54 pm

**Stop conversion therapy!**

Please do not allow this to happen!

**Commenter:** Anne M. Thompson

3/20/19 8:55 pm

**Sexual orientation conversion therapy**

Sexual orientation conversion therapy is not therapy Itis cruel and unusual punishment masquerading as therapy. Psychologists who practice it are harming, not helping children and young adults. Please decide to impose discipline on those who employ sexual orientation conversion practices.

**Commenter:** David Pegram

3/20/19 9:01 pm

**Don't prescribe licensed counselors**

Please don't stop licensed counselor s in Va from helping patients get over over their unwantedbsame sex attractions.

**Commenter:** Rev. Joe Cobb, Vice Mayor, City of Roanoke, VA

3/20/19 9:15 pm

**Honoring the Gift of Sexual Orientation and Gender Identity/Expression**

Human sexuality is a gift. Within the human community, there are many natural expressions of this gift, made known through our sexual orientations, gender identities and/or expressions. To prescribe any other reality than this is detrimental to the wholeness of a human being. For centuries, religion, and even psychotherapy, has attempted to curtail, suppress and oppress human beings who identify as LGBTQIA by claiming that their sexual orientation, gender identity and gender expression make them less than, deviant, abominations, broken, sinful, and abhorrent. Multiples diagnoses have been described and proscribed to minimize and generalize these gifted human beings as outside the norm of human behavior. This must stop.

Thankfully, psychiatry has come to recognize that mental health is made whole through recognition that one's natural way of relating to the world and to humankind is as unique and wonderful as each person's sexual orientation, gender identity and expression. Religion, unfortunately, lags far behind, continuing its horrific treatment toward the spiritual giftedness of these same people.

I urge the Virginia Board of Psychology to prohibit conversion therapy for minors. Our work as the human community is to honor and celebrate the gift of our human sexuality and its beautiful diversity of sexual orientation, gender identity and expression. By doing so, we will pave the way for our youth to embrace and celebrate who they are now, and watch as they become the extraordinary, gifted people they are meant to be.

**Commenter:** Doris Dippel

3/20/19 9:20 pm

### **A Client's Right**

A client should have the right to seek counseling when troubled or in doubt about their sexual orientation. A counselor should have the freedom to explore with such a client the options open to the client and to assist the client in choosing and attaining the lifestyle and sexual identity they prefer, working toward that end. To not allow free discourse according to the client's decision and desire for assistance to attain that goal robs the client of free speech and human rights as accorded to them by the U.S. Constitution.

**Commenter:** Jessie

3/20/19 9:21 pm

### **Conversion therapy is harmful.**

? This guidance will protect youth from so-called "conversion therapy," a dangerous and discredited practice aimed at changing their sexual orientation or gender identity. ? These dangerous and discredited practices are based on the false claim that being lesbian, gay, bisexual, transgender, or queer (LGBTQ) is a mental illness that needs to be cured—a view with no scientific basis. ? This guidance protects young people from state-licensed therapists in Virginia who falsely claim to parents and youth that being LGBTQ is a mental illness, and therefore taking advantage of parents and harming vulnerable youth. ? These harmful practices use rejection, shame, and psychological abuse to force young people to try and change who they are. ? These practices are known to be extremely dangerous and can lead to depression, decreased self-esteem, substance abuse, and even suicide attempts. ? No young person should ever be shamed by a mental health professional into thinking that who they are is wrong. Mental health professionals should provide care that is ethical and affirming for lesbian, gay, bisexual, and transgender young people. ? We can't allow one more young person to be targeted and hurt by these dangerous and discredited practices.

3/20/19 9:33 pm

**Commenter:** Season

**Conversion “therapy” is abuse.**

**Commenter:** Debbie Longest

3/20/19 9:47 pm

**Ban Conversion Therapy.**

Ban this evil torture. There are no reputable therapists that support this medieval practice. Furthermore, it does not work. No parent should have free reign to torture their children.

**Commenter:** Marilyn Matula

3/20/19 9:55 pm

**Ban conversion “therapy”**

Please end this awful, misguided, practice. Conversion therapy has been proven to be harmful. There is absolutely NO scientific, medical, evidence showing any benefit to this type of program.

**Commenter:** MH

3/20/19 9:56 pm

**Not Therapeutic**

In the 5 years that my son had been 'out' first as a lesbian and then as a transgender teen, he has seen a number of mental health professionals and doctors. They include licensed professional counselors, a psychiatrist, a nutritionist, a pediatric endocrinologist, and a doctor of adolescent medicine. No where, not one time has one of these medical professionals asked if I was interested in conversion therapy. Not once was it suggested that I try and change him. They sought acceptance, perseverance, adaptation and kindness. They offered to help guide the family, monitor his mental and physical health while making sure he was in a safe space at home. This is how this process should be. This is how mental health should work. Allowing for youth to be tortured in a way that makes uncomfortable adults feel better is just plain wrong. Follow the science. Follow the reality and stop this harm being pushed onto our children.

**Commenter:** Amanda Powell

3/20/19 9:56 pm

**Conversion therapy is harmful**

Conversion therapy is harmful and akin to torture. It causes those in it unnecessary mental and emotional stress. Increasing their chances for suicide. It has been documented by many healthcare professionals to be harmful and dangerous.

**Commenter:** SUZANNE Wieringo

3/20/19 9:56 pm

**Ban “Conversion Therapy”**

I can't believe that this is even a debate. No reputable therapist would recognize this as a legitimate treatment.

**Commenter:** D. Daughtry, private citizen

3/20/19 9:57 pm

#### **For Freedom: Keep Counseling Reality-Based**

The proposed legislation will prevent counselors from sharing with clients the self-evident realities of human identity and sexuality. Using "administrative regulations" is an alternative path toward censorship of those who oppose gender-change. The state Boards of Counseling, Psychology, and Social Work appear to be engaged in the process of adopting guidance documents and regulations to stifle licensed professionals' free speech rights. This will also result in denying some patients their basic right to direct the counseling objectives they seek. Don't force everyone to conform to one view - let individuals exercise their right to decide for themselves!

**Commenter:** Margaret Sacra MEd

3/20/19 10:05 pm

#### **Please Disallow so-called "conversion therapy"**

I am pleased to support **Guidance Document 125-9, on the Practice of Conversion Therapy**, which would protect youth under the age of 18 from so-called "conversion therapy" at the hands of licensed psychologists in Virginia. As a former educator, I have worked with many children questioning who they are and will be. Each is vulnerable to feelings of inadequacy and confusion, especially those that feel set apart or different.

The premise of so-called "conversion therapy" is that the difference of being LGBT is something that can and should be fixed. As opposed to being one of many components that will define the child in their world and allow them to live a true and authentic life as the person they were intended to be. Psychology and all the helping professions, should provide a child with affirmation of their importance and uniqueness, embracing their differences as one of the many things that makes them who they are. The therapy should be about acceptance and growth to be the best citizen and individual a child can be. So-called "conversion therapy" is anything but, condoning fear, confusion, self-loathing, and self-hatred that follows a child well into adulthood, if not all their lives.

Please make so-called "conversion therapy" unacceptable for professional practitioners in our great Commonwealth.

**Commenter:** Evelyn BruMar

3/20/19 10:09 pm

#### **Protect our Youth, Protect our LGBT children**

I was almost kidnaped by a relative who believed that conversation therapy would fix me and correct the shame, he believed I was bringing to my family. I escaped because I made such a scene that it drew the attention of bystanders. That experience traumatized me, and I didn't get the full experience of learning to hate myself by people of authority (Faith leaders or and Medical Professional). It has been 20 years since that experience and currently my family is proud of me and my wife only because I had the courage and the support from people who knew that I wasn't sick. It is hard to heal broken children, I was a foster parent, currently an adoptive parents of a teen from the foster care system. The abuses they suffer would be equivalent to the abuses our LGBT youth suffer from conversation therapy. We must help heal the pain by allowing closure for our LGBTQ youth and community. Help them move on and be productive members of our communities. Please hold clinicians accountable so our healthcare can do what it is meant to do, help, heal and do no harm. Thank you.

**Commenter:** Zoe Tighe

3/20/19 10:26 pm

**Protect our children**

Please protect all our children from the harm of "conversion" therapy which isn't a real thing. Our children need support not the horror of an attempt to "convert" them; they don't need conversion — they are perfect and wonderful as they are.

**Commenter:** Juliet Hiznay

3/20/19 10:30 pm

**Conversion isn't therapy**

So-called "conversion therapy" serves no therapeutic purpose. Individuals have a right to self determination. This is a form of brainwashing. Please consider the psychological damage it inflicts as you contemplate the standards of your profession. First, do no harm.

**Commenter:** M. Taylor

3/20/19 10:33 pm

**Ban Conversion therapy**

Religious organization are pusing for converstion therapy and brainwashing their congregations with their dogmatic beliefs. Their opinions on converstion therapy are not based in fact or science, but fear. Please do not allow theocratic counselors to mentally punish children due to their lack of understanding of human nature. We are a secular nation, not a theocracy. Doctors should do no harm.

**Commenter:** Kenny Boddye, Boddye for Supervisor

3/20/19 10:37 pm

**End the Inhumane Torture of LGBTQ+ Youth**

In violation of the 1985 International Human Rights Convention, Geneva Convention provisions, the 1994 federal Anti-Torture statute, and of common human decency, Virginia still allows the torture of LGBTQ+ youth. While some would mask such torture with the false moniker "conversion therapy," we know that it subjects people to physical, mental, emotional and spiritual agony. All to try and fundamentally change how a person identifies, who they love, or even who they are.

Even if we were to set aside the countless studies that have been done on the long-term affects of trauma caused by this torture, there is no evidence that "conversion therapy" helps anyone. It certainly doesn't help the person being subjected to it, and it provides no public good.

This form of torture needs to be abolished at once, regardless of if laws are passed by the General Assembly.

**Commenter:** Krista Robinson

3/20/19 10:43 pm

**Why not support them and not try to "convert" them?**

**Commenter:** William Moncure

3/20/19 10:48 pm

### **Don't Torture Children**

Conversion "therapy" is nearly universally recognized as harmful in the medical community. As somebody with a degree in Psychology, and who is about to start graduate school to become a therapist, I can absolutely tell you that research on these "therapy" techniques shows that they are incredibly harmful. Children exposed to sexuality conversion attempts suffer from higher rates of anxiety, depression, suicide, low self-esteem, and drug addiction. These symptoms are similar to those caused by physical child abuse.

Additionally, minors can not realistically consent to these "treatments". First off, they are too young to give consent. Secondly, they are in a coercive circumstance because, in many cases, their families may disown them if they do not want to go through the therapy. A child who is being coerced can not legitimately give consent.

Please ban these practices from being used with children.

**Commenter:** Chris DeRosa

3/20/19 10:53 pm

### **Conversion therapy is harmful**

Conversion therapy is not effective; it is, in fact, harmful. Therapists should NEVER recommend this to any patient or family. It would be unethical to do so.

**Commenter:** Jack Zhang

3/20/19 11:01 pm

### **Ban Conversion Therapy**

It is unethical, and causes a great deal of harm.

**Commenter:** Linda Allen

3/20/19 11:11 pm

### **Stop Conversion Therapy!**

Conversion therapy is abuse and torture - psychological, emotional and physical. Clinicians who practice conversion therapy should lose their license and be subject to civil (possibly criminal) penalties

To force anyone, especially children, to do something that is impossible causes trauma.

Victims of this child abuse should be able to sue their abusers for damages including compensation for therapy for post-traumatic stress and other harms.

**Commenter:** Alexander Ramos Wallace

3/20/19 11:16 pm

### **Stop conversion therapy**

Conversion therapy is nothing more than torture based on superstition and not science - and ignores the autonomy of the child in any case. It should be banned in the Commonwealth as soon as possible.

**Commenter:** Susan Essman

3/20/19 11:28 pm

**Hold therapists to the standard of their profession**

Mental health professionals around the world have determined that conversion "therapy" is anything but therapeutic; this practice does not help anyone. LGBTQ folks are anything but broken, and any regimen that purports to "fix" them is misguided at best, and has the potential to cause tremendous psychological damage. Like all physicians, mental health workers have a solemn duty to begin by doing no harm. We can help them by ensuring that conversion therapy is not on the list of acceptable methods.

**Commenter:** Melissa McKenney

3/20/19 11:32 pm

**Ban conversion therapy**

It's unfortunate that Virginia's efforts to ban conversion therapy via changes to state code have failed. We look to the Department of Health Professions Board of Psychology to protect minors from this destructive practice.

**Commenter:** Erika Joyner

3/20/19 11:33 pm

**Ban Conversion Therapy**

Therapy to convert someone away from something they were born with cannot possibly work. A person's sexual orientation or gender identity are basic qualities that they are born with. Conversion therapy is based on the mistaken theory that a person's sexual orientation or gender identity that deviates from the norm is an affliction. Such therapy can only lead to feelings of shame and guilt and an externally derived sense of self. Conversion therapy is misguided at best and seriously damaging at worst. All children born are children of a gracious God who loves them all equally. Can we not do the same?

**Commenter:** Lea Booth, Student at William and Mary

3/20/19 11:45 pm

**Gay conversion therapy**

Gay conversion therapy harms its patients for something that doesn't need to be "cured". The American Academy of Child and Adolescent Psychiatry, American Academy of Pediatrics, and many more health organizations and professional groups have found no evidence that gay conversion therapy has any benefits and instead actually harms its patients.

Two of my best friends are gay, and I'm thankful their parents never forced them to undergo the painful ordeal of gay conversion therapy. Please don't let gay conversion therapy continue.

**Commenter:** Lois Hed

3/20/19 11:47 pm

**Conversion Therapy**

Why is this a topic of discussion in 2019?! This is a pseudo-scientific practice at best. Every mainstream medical & mental health organization has rejected this practice. It can lead to depression, anxiety, drug use, & suicide in its victims. And for what? You cannot change who



someone is...and why would you want to try? Fact is: it doesn't work. All it does is harm the individual that the practitioner is trying to change. Stop with this. Spend that money on something that matters: improving public schools, rebuilding infrastructure in our commonwealth, and microchipping companion animals...

**Commenter:** Robyn E. Deane

3/20/19 11:56 pm

**Leave no room for a 'Good intentions' defense**

John W. Money, PhD, was a researcher best known for his groundbreaking work in the study of sexual identity and the biology of gender. In his most famous study that he called the John/Joan case, his seemingly well-intended work with David Reimer, born as one of twin boys in appearance, ultimately led to his subject's suicide. While this is not specifically a case involving conversion therapy, the facts of the case are instructive of the impact that misguided therapy that would attempt to override a hard-wired predisposition, though well-intended, resulted in the worse possible outcome. If you aren't familiar with the case, please look it up, read it, and make the logical choice to rule out conversion therapy in minors, period, end of story.

**Commenter:** Katherine M Scott

3/20/19 11:59 pm

**Protect kids from harmful "treatment"**

Conversion therapy is ineffective and traumatizing. Thus it is not an ethical practice.



Yeatts, Elaine &lt;elaine.yeatts@dhp.virginia.gov&gt;

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**Testimony on Sexual Orientation Change Efforts for VA BOP**

1 message

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**Laura Haynes, Ph.D.** <laurahaynesphd3333@gmail.com>  
To: elaine.yeatts@dhp.virginia.gov

Wed, Mar 20, 2019 at 4:55 PM

Dear Elaine Yeatts,

I am submitting the attached testimony to the Virginia Board of Psychology in favor of therapy that is open to change in sexual orientation or gender identity.

I represent the National Task Force for Therapy Equality.

Thank you.

Laura Haynes, Ph.D., California Licensed Psychologist

USA Representative, International Federation for Therapeutic and Counselling Choice (IFTCC.org)

Chair of Research and Legislative Policy, National Task Force for Therapy Equality (TherapyEquality.org)

Consultant, American College of Pediatricians (ACPeds.org)

Member Research Committee, Alliance for Therapeutic Choice and Scientific Integrity (TherapeuticChoice.com)

Member, California Counseling Coalition

Former President, Christian Association for Psychological Studies—Western Region

Lifetime Member, American Psychological Association

Member, California Association of Marriage and Family Therapists

P.O. Box 653, Tustin, CA 92781

714-665-3333

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 **Harms of Therapy Bans - VA Board of Psychology 2019-3-20\* .pdf**  
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## Protect the Right to Therapy

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### Fact Sheet: Harms of Censoring Change-Allowing Therapy

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Dear Members of the Virginia Board of Psychology:

March 20, 2019

#### HIGHLIGHTS OF OUR CONCERNS

- (1) US Supreme Court: professional speech has the same 1st Amendment rights as other speech; abrogated 9th&3rd Circuit Ct. decisions. Fed judge: ban fails *all* 1st Amendment tests.
- (2) A new study in a peer-reviewed journal adds to over a century of research showing some people change their sexual attraction and behavior through a variety of safe and effective, non-aversive, mainstream therapy methods. ACLU RI: marriages and families can be saved.
- (3) APA Task Force affirms: No research meeting scientific standards shows today's change-allowing talk therapy to be harmful or ineffective or affirmative therapy to be better. Affirms reputable professional therapists have not used aversive methods for 40-50 years.
- 4) Sexual orientation and childhood gender dysphoria are fluid and often change. Living as the opposite sex and medicalizing stop natural resolution of gender dysphoria in minors.
- (5) Trans-affirmative medical treatment: unhealthy, 19 times higher rate of completed suicides. Chemical/physical sterilization/castration of minors should be illegal. Talk therapy is safer.
- 6) Same-sex orientation and gender dysphoria are *not innate*, organizations and research say. Professional organizations say there may be pathological causes such as childhood sexual abuse trauma for some or family dynamics.
- (7) These clients may *require psychotherapy* that may result in change in sexual orientation or embracing their sex. WPATH does not recommend medical affirmative treatments when an underlying psychiatric disorder is causing gender dysphoria. Failure to treat increases suicides.
- (8) ACLU of Rhode Island warns: bans censor a *broad range* of therapy goals.
- (9) Under a ban, change-desiring people get coerced therapy or no therapy. Left hopeless.
- (10) Using therapy bans to influence public beliefs is unconstitutional viewpoint discrimination. Recent national research shows Evangelical sexual minorities are happy—not repressed or faking, and a theological shift is not necessary. Conservative parents, ministries, and therapists can help religious minors/adults experience this happiness. Beliefs that give them real joy may not work for your or your family member, but should they have their freedoms taken away?

Everyone has the right to walk away from sexual practices and experiences that don't work for them. Professional organizations, religious organizations, and most states agree.

Testimonies of change through therapy or faith-based ministries: [VoicesOfChange.net](http://VoicesOfChange.net), [ChangedMovement.com](http://ChangedMovement.com), [SexChangeRegret.com](http://SexChangeRegret.com), [tranzformed.org](http://tranzformed.org), [I'm Not A Fraud video](#).

National Task Force for Therapy Equality, [info@TherapyEquality.org](mailto:info@TherapyEquality.org)

MORE DETAILS AND REFERENCES AT: [TherapyEquality.org/HarmsOfTherapyBans](http://TherapyEquality.org/HarmsOfTherapyBans)

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## Protect the Right to Therapy

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### Fact Sheet: Harms of Censoring Change-Allowing Therapy

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#### FOR MORE DETAILS AND REFERENCES:

(1) **US Supreme Court: professional speech has the same First Amendment rights as any other speech; effectively abrogated 9th and 3rd Circuit Court decisions.<sup>1 2 3</sup> Not permissible under Constitution to allow affirmative therapy but not change-allowing therapy.<sup>4</sup> Federal magistrate judge reports Tampa, FL therapy ban was shown to fail **all** First Amendment tests.<sup>5</sup> **ACLU RI<sup>6</sup> & Religious Organizations:<sup>7</sup> bans threaten 1st Amendment rights.****

(2) **A new study in a peer-reviewed journal<sup>8</sup> shows some people safely change their sexual attraction and behavior through therapy.**

**Adds to 5 meta-analyses and over a century of studies, including by APA members in APA peer reviewed journals, showing people changed.<sup>9</sup>**

The men in this study decreased same-sex attraction and behavior, increased opposite sex attraction and behavior, decreased depression, substance abuse, and suicidality, and increased self-esteem. Many who experienced heterosexual attraction for the first time became only heterosexually attracted.

Rates of change: about the same as for anything else therapists treat.

- Therapists used a variety of safe, non-aversive,<sup>10</sup> well-established therapy practices used in clinics world-wide. Bans take away safe, effective therapy.
- Gay-affirming therapy<sup>11 12</sup> was unacceptable to most on religious grounds.
- Some same-sex attracted minors and adults, like many people, want to be able to procreate children with their spouse and remain married, full-time parents.<sup>13</sup>
- ALCU Rhode Island: under a ban, there will be marriages that can't be saved.<sup>14</sup>
- **Several professional organizations support this change-allowing therapy.<sup>15</sup>**

(3) Amer. Psychological Assn Task Force: No research meeting scientific standards shows change-allowing therapy today is harmful/ineffective for adults/minors or affirmative therapy is better.

(3a) History of Behavioristic and Aversive Methods

The APA Task Force Report (2009) said behavioristic and aversive methods were predominantly used 40-50 years ago, in the 1960's and early 1970's, and contemporary change-allowing therapy does not use them. Behaviorism was the dominant, mainstream form of therapy decades ago that used classical and op-



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erant behavioristic methods that included rewards and aversive consequences to change overt behavior. Behavioristic and aversive methods never were a form of therapy designed just for addressing same-sex behavior. The methods were used for various kinds of unwanted behavior including drinking and smoking. They were even used for marriage counseling. Therapists who are open to change have used mainstream methods for their day. When therapists moved on to other forms of therapy, change-allowing therapists did as well.

(3b) Reputable change-change-allowing therapists today do not use behavioristic or aversive methods.

Many professionals, and even the *APA Handbook of Sexuality and Psychology*, mistakenly hold that change-allowing therapists are using these methods today and base their opposition to change-allowing therapy on this erroneous understanding. For example, the *APA Handbook* says,<sup>16</sup>

The interventions are based on classical and operant principles. The efforts are unsuccessful even among the highly motivated individuals who pursue such interventions (for reviews, see American Psychological Association, 2009; Beckstead, 2012).

The statement references the 2009 APA Task Force Report that actually says behavioristic methods are not effective and contemporary change-allowing therapists do *not* use them. The signer of this letter personally told Dr. Lee Beckstead, who was a member of the 2009 APA Task Force and who authored the 2012 paper the *Handbook* referenced, that the *APA Handbook* says change-allowing therapists are using these behavioristic methods. Dr. Beckstead replied, "It's not true."<sup>17</sup>

(3c) No research meeting scientific standards shows change-allowing therapy to be harmful.<sup>18 19</sup>

The APA Task Force Report said it was unable to conclude from scientific evidence whether either affirmative therapy or change-allowing therapy was effective or harmful. It said there is no research meeting scientific standards that shows change-allowing therapy today is harmful, and it found no causal evidence



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of harm. It had no research that showed affirmative therapy is better than change-allowing therapy.

(3d) APA Task Force Report conclusion was based on one-sided anecdotal, not scientific, evidence.

The Task Force said research provided anecdotal evidence that people said they changed sexual orientation and felt their lives were better for it, and some research provided anecdotal evidence some people felt they were harmed. The Task Force based its conclusion on a “key” view that sexual orientation (meaning same-sex attraction) does not change through life experience.<sup>20 21</sup> This view was discredited by the *APA Handbook of Sexuality and Psychology* five years later (2014) and by several rigorous studies.<sup>22</sup> As a consequence of this view, the Task Force dismissed hundreds of publications that spanned over a century, including studies published by APA members in APA peer reviewed journals, showing that people change, saying they thought the people just felt better because they talked to someone. It then accepted anecdotal evidence of harm from a small number of studies that it said did not meet scientific standards. It said it based its recommendation against change-allowing therapy on one-sided anecdotal evidence of a small number of studies, not scientific evidence. It said its conclusion was tentative.

(3e) The members of the APA Task Force were already committed to its conclusions on political or philosophical grounds when the chair of the Task Force selected them. Professional therapists who are now members of our National Task Force for Therapy Equality wrote to the APA Task Force chair asking her to include qualified change-allowing clinicians and researchers who had expertise in change-allowing therapy and who had offered to serve, and we received letters in which she stated her refusal.

(4) Organizations position statements are opinions influenced by activist members. They are not scientific evidence.

The American Psychological Association based its position on this Task Force conclusion. The APA is the only professional organization we know of that at-



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tempted to base its position statement on a review of research. Professional organization position statements on change-allowing therapy are opinions influenced by political activist members, and they are not scientific evidence.

#### (4) **Sexual orientation and childhood gender dysphoria are fluid, change.**

- Same-sex *attraction, behavior, identity, and questioning* often change,<sup>23</sup> mostly toward or to exclusive heterosexuality,<sup>24</sup> for adolescents<sup>25</sup> and adults, men and women (American Psychological Association, rigorous research).
- Gender dysphoria resolves in 75–98% of minors. (9 professional orgs.)<sup>26</sup>
- **Cross dressing and puberty blockers stop natural resolution in minors.**<sup>27</sup>

#### (5) **Affirmative medical treatment is unhealthy, hardly suicide prevention.**

**It's a risky path of:** experimental puberty-blockers<sup>28</sup> (no research<sup>29</sup>), high dose, toxic<sup>30</sup> wrong-sex hormones (poor research<sup>31</sup>), permanent infertility, potential loss of sexual function, being a medical patient for life, destroying healthy breasts and reproductive organs,<sup>32</sup> 2-2.5 times higher rate of heart disease and cancer **deaths**, persisting 2.8 times higher rate of psychiatric hospitalizations, **19 times higher rate *completed* suicides**—even if they live in an affirming society.<sup>33</sup> **These statistics come from the *best available research*.**<sup>34</sup> **ACLU of Rhode Island: this treatment is highly controversial even among professionals.**<sup>35</sup> **Talk therapy is safer. No research shows sterilizing minors/adults is better.**

#### (6) **Same-sex orientation and gender dysphoria are *not innate*.**<sup>36 37</sup>

**Professional organizations agree they may have pathological causes.**

- The American Psychological Association's *Handbook of Sexuality and Psychology* (2014) says there is no gay gene,<sup>38</sup> *same-sex sexuality* is not simply biologically caused like skin color, always has psychological<sup>39</sup> or psychoanalytic<sup>40</sup> causes, and may be caused by childhood sexual abuse for some.<sup>41</sup>
- 10 professional organizations say *gender dysphoria* is not simply caused by biological factors such as brain microstructures but has psychological causes.<sup>42</sup> The *APA Handbook*<sup>43</sup> and the World Professional Association for Transgender Health (WPATH) "Standard of Care"<sup>44</sup> say there may be pathological causes.

#### (7) **Resolving underlying trauma or psychopathology *requires psychotherapy* and may as a *by-product* change sexual orientation or gender identity.**





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- The *APA Handbook* cautions the affirmative approach can neglect treating individual problems a gender dysphoric individual is experiencing.<sup>45</sup>
- **WPATH does not recommend medicalizing treatments when an underlying psychiatric disorder is causing gender dysphoria.<sup>46</sup> Banning therapy leaves therapists nowhere to go with these clients.**
- Failure to treat can lead to persisting trauma, adverse life consequences, and suicide. Worldwide, 90% of people who commit suicide have unresolved mental disorders.<sup>47</sup> So, for heavens sake, do not ban ordinary, client-directed therapy that may as a by-product result in sexual attraction or behavior change or in embracing innate sex. That is all that change-allowing therapy actually is.<sup>48</sup>

(8) **ACLU R.I.: therapy bans censor a broad range of therapy goals.<sup>49</sup> Attraction feelings for 5 year old children, sexual or pornography addictions, and more can only be treated if directed toward the opposite, not same, sex.<sup>50</sup>**

(9) **Under a therapy ban, clients get coerced therapy or no therapy. A ban mandates therapists to affirm sexual and gender feelings that were caused by trauma.** This is harmful. People who want change-allowing therapy can instead get exactly what they do *not* want—LGBT-affirmative or so-called neutral therapy—that does not lift a finger to offer trauma treatments that are open to change.<sup>51</sup> No research supports coercing a type of therapy a client does not want. Therapists will refuse to do it. A ban boxes people into hopelessness. **And in reality, many therapists will be afraid, because of this law and legal counsel, to see change-desiring clients at all** and potentially any sexual or gender minority clients at all, because a client's sexual attraction or gender identity may change during therapy, placing the therapist at risk. Already, in states that have censored change-allowing therapy for minors, many get *no professional mental health services*. Some sexual minorities are sexual abuse victims or suicidal. Cutting off access to services is dangerous, cruel, and unjust.

(10) A purpose of bans is to coerce compliance with one affirmative ideological view by taking away freedoms out of a mistaken belief that doing so is necessary to support all sexual minorities. **A national study finds Evangelical sexual minorities are happy. And recent research conjointly conducted by affirmative and change-allowing researchers together shows sexual minorities of tradi-**



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**tional faiths *can* experience satisfaction that is *real*.<sup>52</sup> Stereotypes that they must be repressed or just faking have no basis in fact. **Conservative parents, ministries, and therapists can help conservative minorities experience this satisfaction. A theological shift is not necessary.** A view that brings true joy for some may not work for you or your family member, but should they have their freedoms taken away? **Viewpoint discrimination in law is unconstitutional<sup>53</sup> and bullying.****

**Everyone has the right to walk away from sexual practices and experiences that don't work for them and should have support to do so.**

*Laura Haynes, Ph.D.*

Psychologist, P. O. Box 653, Tustin, CA 92781; [laurahaynesphd.com](http://laurahaynesphd.com)

Representing the National Task Force for Therapy Equality, [info@TherapyEquality.org](mailto:info@TherapyEquality.org)

**ENDNOTES GIVING MORE INFORMATION AND REFERENCES (below):**



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**<sup>1</sup>PROFESSIONAL SPEECH HAS THE SAME CONSTITUTIONAL RIGHTS AS ANY OTHER SPEECH.**

(*NIFLA v. Becerra*, 138 S.Ct. 2361, 2018.) In *NIFLA*, the Supreme Court expressly rejected the principle legal basis for the decision in *Pickup v. Brown*, in which the 9th Circuit said that SB1172, which banned sexual orientation change efforts for minors, was constitutional.

Justice Thomas, who wrote the main opinion, said (p. 14):

This Court has never recognized ‘professional speech’ as a separate category of speech subject to different rules. Speech is not unprotected merely because it is uttered by professionals.

As defined by the courts of appeals, the professional-speech doctrine would cover a wide array of individuals—doctors, lawyers, nurses, physical therapists, truck drivers, bartenders, barbers, and many others. See Smolla, *Professional Speech and the First Amendment*, 119 W. Va. L. Rev. 67, 68 (2016). One court of appeals has even applied it to fortune tellers. See *Moore-King*, 708 F. 3d, at 569. All that is required to make something a “profession,” according to these courts, is that it involves personalized services and requires a professional license from the State. But that gives the States unfettered power to reduce a group’s First Amendment rights by simply imposing a licensing requirement. States cannot choose the protection that speech receives under the First Amendment, as that would give them a powerful tool to impose “invidious discrimination of disfavored subjects.



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<sup>2</sup> PROFESSIONAL SPEECH HAS THE SAME CONSTITUTIONAL RIGHTS AS ANY OTHER SPEECH—continued.

(*National Institute of Family and Life Advocates v. Becerra*, 138 S.Ct. 2361, 2018.) In *NIFLA*, the Supreme Court brings into serious question the 9th Circuit Court's decision in *Pickup v. Brown*, on which authors of therapy bans have relied.

Mary McAllister of Liberty Council re CA consumer fraud therapy ban bill, AB2943, 2018:

...the United States Supreme Court's June 26, 2018 opinion in *NIFLA v. Becerra*, No. 16–1140....This decision, which reverses Ninth Circuit decisions regarding the Reproductive Freedom, Accountability, Comprehensive Care, and Transparency Act (FACT Act), places into serious question the Ninth Circuit's decision in *Pickup v. Brown*, 740 F. 3d 1208 (9th Cir. 2014), upon which the authors of AB2943 have relied. The Supreme Court's criticism of the *Pickup* ruling should be of concern to the State Senate as it considers AB2943;" Analysis: <https://drive.google.com/file/d/0B9njBaZTrCfSdmZiLWF5VnJvNDExcXg5T0FPTWtvNIZn-X2xB/view>. Alliance Defending Freedom analysis: <https://drive.google.com/file/d/0B9njBaZTrCfSVkIGell1WXZ0NG8tbmgzVGs5eGtpS0NBV0hB/view>

Alliance Defending Freedom analysis of *NIFLA v. Becerra* and analysis of AB 2943. <https://drive.google.com/file/d/0B9njBaZTrCfSVkIGell1WXZ0NG8tbmgzVGs5eGtpS0NBV0hB/view>



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<sup>3</sup> Change-allowing therapy also is not only commercial speech, so it is protected speech under the U.S. Constitution. Matt Sharp, senior counsel of the constitutional law firm, Alliance Defending Freedom, gave this analysis of therapy bans when he wrote of a California bill, AB 2943, in personal communication:

The Supreme Court has made clear that commercial speech is “speech which does no more than propose a commercial transaction.” *Va. State Bd. of Pharmacy v. Va. Citizens Consumer Council, Inc.*, 425 U.S. 748, 762 (1976). Even when there is a commercial aspect to speech, that speech does not “retain[] its commercial character when it is inextricably intertwined with otherwise fully protected speech,” *Riley v. Nat’l Fed’n of the Blind of N.C., Inc.*, 487 U.S. 781, 796 (1988). When protected speech is part of the speaker’s message, this Court will “apply [its strict scrutiny] test for fully protected expression.” *Id.* Here, AB 2943 intrudes upon the purest sort of private, noncommercial, communications between a counselor and the client. It goes far beyond regulating speech that merely proposes a commercial transaction because it regulates what a counselor or therapist can and cannot say during a private session with a client. Thus, AB 2943 would be subject to strict scrutiny, which it is unlikely to survive.

Importantly, the same argument regarding commercial speech was made by California when defending the California Reproductive Freedom, Accountability, Comprehensive Care, and Transparency Act in the case of *NIFLA v. Harris*. Even the 9th Circuit Court of Appeals rejected the argument that law was designed to regulate commercial speech, recognizing that it regulated the speech inside a pregnancy care center:

We find unpersuasive Appellees’ argument that the Act regulates commercial speech subject to rational basis review. *See Zauderer v. Office of Disciplinary Counsel of Supreme Court of Ohio*, 471 U.S. 626, 651, 105 S.Ct. 2265, 85 L.Ed.2d 652 (1985). Commercial speech “does no more than propose a commercial transaction.” *Coyote Pub., Inc. v. Miller*, 598 F.3d 592, 604 (9th Cir. 2010) (citation omitted). The Act primarily regulates the speech that occurs within the clinic, and thus is not commercial speech.

*Nat’l Inst. of Family & Life Advocates v. Harris*, 839 F.3d 823, 835 n.5 (9th Cir. 2016), *rev’d and remanded sub nom. Nat’l Inst. of Family & Life Advocates v. Becerra*, 138 S. Ct. 2361 (2018).



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<sup>4</sup> Under a therapy ban, a therapist may provide affirmative therapy at the direction of the client, but a therapist is forbidden to provide change-allowing therapy at the direction of the client. Such non-neutral application of the law is not permissible under our Constitution. *Masterpiece Cakeshop, Ltd. v. Colorado Civil Rights Commission*, 138 S.Ct. 1719 (2018).

Alliance Defending Freedom (personal communication):

"How does the recent ruling in *Masterpiece Cakeshop* impact the constitutionality of AB 2943 (the consumer fraud therapy ban bill in California that the sponsor pulled on 8/31/2018)?"

The Supreme Court held that the state of Colorado did not act with the required neutrality towards Jack Phillips when it prosecuted him for declining to create a custom-designed wedding cake to celebrate a same-sex wedding. The lack of neutrality was evidenced by the state upholding the freedom of other cake artists to decline to create cakes that celebrate messages they found offensive.

AB 2943 operates in a similar manner. Counselors, religious organizations, and even churches are subjected to differential treatment when they provide fee-based services and resources to those seeking personal life changes based on their religious views. A counselor who, at the direction of a client, helps affirm the client's same-sex attractions remains free to do so. But a counselor who, also at the direction of a client, helps a client explore and pursue personal life changes for unwanted attractions is subject to liability. Such non-neutral application of the law is not permissible under our Constitution.

<sup>5</sup> U.S. Magistrate Judge in the Middle District of Florida recommended a preliminary injunction on Tampa, FL therapy ban, relying on, among other authorities, *NIFLA v. Beerra*.

Liberty Counsel press release says, "...the plaintiffs demonstrated that the law violates each and every test of the First Amendment. The plaintiffs demonstrated that the ordinance is unconstitutional because it is (1) a content restriction that is not narrowly tailored; (2) a viewpoint discrimination; (3) unconstitutionally overbroad; (4) a prior restraint; and (5) unconstitutionally vague.

<https://lc.org/newsroom/details/013019-tampa-counseling-ban-enjoined-1>

The judge's "Report and Recommendation:"

<http://lc.org/013019TampaPIOrder.pdf>

<sup>6</sup>ACLU of Rhode Island (March 22, 2017), Why the ACLU of Rhode Island opposes conversion therapy, but also opposes legislation to ban it. <http://www.riaclu.org/blog/post/the-aclu-of-rhode-island-opposes-conversion-therapy>



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<sup>7</sup> RELIGIOUS ORGANIZATIONS that oppose a consumer fraud ban on change-allowing therapy include the two largest: **California Catholic Conference** which is the political action organization for all the Catholic bishops of the state of California and the **Ethics & Religious Liberty Commission of the Southern Baptist Convention** which is far and away the largest Protestant denomination in the U.S. (<https://erlc.com/resource-library/articles/californias-latest-threat-to-religious-liberty-and-free-speech>). See [AB2943.com](http://www.ab2943.com) for many clergy, for example hundreds of California pastors in **Church United** (<http://www.churchunited.com/impact/>), **Awake America** (<http://awakeamericaca.org/alerts/>) and other organizations that oppose a consumer fraud ban and defend for their First Amendment rights.

<sup>8</sup>Santero, P., Whitehead, N., & Ballesteros, D. (2018), Effects of therapy on religious men who have unwanted same-sex attraction, *The Linacre Quarterly*, 85(3).

<sup>9</sup> Over a century of research, 600 publications, and 5 meta-analyses, including peer reviewed articles published by APA members in APA journals, converge on finding that when change allowing therapy is done right, people have changed their same-sex attractions and behaviors.

#### **On research 2000 to present:**

Sprigg, P., 2018, Are Sexual Orientation Change Efforts (SOCE) Effective? Are They Harmful? What the Evidence Shows, Family Research Council, <https://www.frc.org/issueanalysis/are-sexual-orientation-change-efforts-soce-effective-are-they-harmful-what-the-evidence-shows> : Read the Full Version (Issue Analysis): <https://downloads.frc.org/EF/EF18I04.pdf>  
Read the Abbreviated Version (Issue Brief Report Summary): <https://downloads.frc.org/EF/EF18I05.pdf>

#### **On research through 2009:**

Report Summary: What research shows: NARTH's response to the APA claims on homosexuality: Summary of *Journal of Human Sexuality* (Volume I), pp. 1-5.  
<https://www.scribd.com/document/125145105/Summary-of-Journal-of-Human-Sexuality-Vol-1>.

Full Report: Phelan, J., Whitehead, N., & Sutton, P.M. (2009), What research shows: NARTH's response to the APA claims on homosexuality: A report of the scientific advisory committee of the National Association for Research and Therapy of Homosexuality. *Journal of Human Sexuality*, 1: 1-121. <https://www.scribd.com/doc/115507777/Journal-of-Human-Sexuality-Vol-1>



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<sup>10</sup> SAFETY OF CHANGE-ALLOWING THERAPY—It's non aversive:

**The American Psychological Association's (APA) task force (2009), the SPLC itself (website, 2016), and licensing board records agree: change-allowing therapy today uses *non-aversive methods*.** Drs. Douglas Haldeman and Jack Drescher, who repeatedly misrepresent change-allowing therapy as using aversive methods, were authors on the APA task force and reported to the American Psychological Association in 2009 that contemporary change-allowing therapy uses *non aversive methods* (p. 82). Testimonies of aversive methods have been documented to be fraudulent and reported to the Federal Trade Commission. The APA task force authors found "no valid causal evidence" of harm (p. 42), and did not declare change therapy unethical. Actually, they said they had no scientific evidence that *LGB-affirmative* therapy is safe or effective (p. 91), and recent reviews say LGBT-affirmative therapy still has many limitations, yet the task force gave affirmative therapy a pass and recommended it. Opponents of change-allowing therapy have relied heavily on the APA Task Force Report, because the APA is one of the few organizations, perhaps the only one, that attempted to conduct a research review as a basis for its position on change-allowing therapy.

National Task Force for Therapy Equality (May 2, 2017), Federal Trade Commission Report: In Their Own Words - Lies, Deception, and Fraud - SPLC HRC NCLR, <https://www.voiceofthevoiceless.info/wp-content/uploads/2017/05/In-Their-Own-Words-Lies-Deception-and-Fraud-National-Task-Force-Complaint-to-the-Federal-Trade-Commission.pdf>

APA Task Force on Appropriate Therapeutic Responses to Sexual Orientation (2009), *Report of the Task Force on Appropriate Therapeutic Responses to Sexual Orientation*. Washington, DC: American Psychological Association.

*Recent reviews find LGBT-affirmative therapy research still has many limitations:* O'Shaughnessy, T., & Speir, Z. (2017) The state of LGBTQ Affirmative Therapy Clinical Research: A mixed-methods systematic, p. 22. Preprint. DOI: 10.1037/sgd0000259.

Catelan, R., Brandelli Costa, A., & de Macedo Lisboa, C. (2017) Psychological Interventions for Transgender Persons: A Scoping Review, *International Journal of Sexual Health*, 29:4, 325-337, DOI: 10.1080/19317611.2017. Hembree et al (2017).

#### **APA presidents have provided successful change therapy and opposed bans.**

Former APA president: Perloff, R. (2014). A call for the American Psychological Association to recognize the client with unwanted same-sex attractions, *Journal of Human Sexuality* 6: 6-21.

Former APA president Nicolas Cummings, Ph.D., (July 30, 2013), Sexual Reorientation Therapy Not Unethical, USA Today, <https://www.usatoday.com/story/opinion/2013/07/30/sexual-reorientation-therapy-not-unethical-column/2601159/>

Former APA President Nicholas Cummings' endorsement: Nicolosi, J. (2009). *Shame and Attachment Loss: The Practical Work of Reparative Therapy*, Downers Grove IL.: IVP Academic.





## Protect the Right to Therapy

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#### **<sup>11</sup> GAY-AFFIRMATIVE THERAPY DOES NOT MEET THE NEEDS OF EVERYONE:**

It may be against the religion of some or not meet their needs in a number of ways.

- **People commonly seek change allowing therapy for sexual attraction or behavior for personal reasons, not due to social pressure. Examples:**
  - (1) Being gay or trans is not fulfilling for them.
  - (2) They feel same-sex feelings or behaviors were caused for them by childhood sexual abuse (the American Psychological Association says excellent research supports this claim). Or they feel gender distress was caused for them by psychological or family experiences or an underlying psychiatric disorder (8 medical and mental health organizations support the possibility for that claim).
  - (3) Being gay or trans does not align with their values and beliefs that should be respected.
  - (4) They, like many people, want a heterosexual marriage and natural children with their spouse.
- **LGB-affirmative therapy for sexual orientation merely offers change-desiring clients help to clarify their sexual orientation identity self-label, in case they are interested in that, but it does not help them change same-sex behavior or attraction.**
- **It only offers support to cope with the suffering of not diminishing their unwanted feelings, but it does not lift a finger to offer trauma treatments that are open to change (APA Task Force, 2009, p. 4). What is more compassionate, to help people change feelings and behaviors they don't want, or to tell them they have to go on living with them?**
- **Frequently, it does not evaluate whether trauma or other psychological factors may be causing the same-sex attraction feelings or behaviors.**
- **There is no research that shows it is safe or effective to force affirmative therapy on people who don't want it.**
- **No research that meets scientific standards shows gay-affirmative therapy is better than change-allowing therapy for people who want change-allowing therapy.**

#### **TRANS-AFFIRMATIVE THERAPY FOR GENDER DYSPHORIA DOES NOT MEET THE NEEDS OF EVERYONE:**

- **It offers body-harming treatments not everyone wants.**
- **Some cannot have these treatments for medical reasons.**
- **It does not offer psychological intervention to resolve distress.**
- **Frequently, it does not evaluate whether an underlying psychiatric disorder is causing the distress over ones sex.**
- **No research that meets scientific standards has compared medical treatment to change ones body versus psychotherapy to embrace ones body (Zucker, 2018).**
- **Talk therapy is safer.**



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<sup>12</sup>LGBT-AFFIRMATIVE THERAPY HAS LIMITED RESEARCH SHOWING IT'S SAFE OR EFFECTIVE:

American Psychological Association Task Force Report (2009), p. 91.

O'Shaughnessy, T., & Speir, Z. (2017) The state of LGBQ Affirmative Therapy Clinical Research: A mixed-methods systematic, p. 22. Preprint. DOI: 10.1037/sgd0000259. Hembree et al (2017).

Catelan, R., Brandelli Costa, A., & de Macedo Lisboa, C. (2017) Psychological Interventions for Transgender Persons: A Scoping Review, *International Journal of Sexual Health*, 29:4, 325-337, DOI: 10.1080/19317611.201



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<sup>13</sup>**According to the American Psychological Association and abundant rigorous research internationally, most people who experience same-sex attraction also experience equal or greater opposite-sex attraction. Like many people, some both-sex attracted people desire to both conceive and raise children with their spouse. Many both-sex attracted people are in opposite-sex relationships by preference. They have a large capacity for sexual orientation change.** They commonly shift along a spectrum that ranges exclusively homosexual to mostly homosexual to bisexual (about equally attracted to both sexes) to mostly heterosexual to exclusively heterosexual. They change mostly toward or to exclusively heterosexual. Even a change of 1 or 2 steps along that spectrum toward greater opposite-sex attraction may enable someone to live their dream. Shouldn't they have the right to counseling they may need and desire to explore their capacity to make that change?

**“Hence, directly contrary to the conventional wisdom that individuals with exclusive same-sex attractions represent the prototypical ‘type’ of sexual-minority individual, and that those with bisexual patterns of attraction are infrequent exceptions, the opposite is true. Individuals with nonexclusive patterns of attraction are indisputably the ‘norm,’ and those with exclusive same-sex attractions are the exception.” This pattern has been found internationally.**

Diamond (2014), in *APA Handbook of Sexuality and Psychology*, 1:633; see also Diamond, L. & Rosky, C. (2016), *Scrutinizing Immutability: Research on Sexual Orientation and U.S. Legal Advocacy for Sexual Minorities. Journal of Sex Research*, 00:1-29. DOI: 10.1080/00224499.2016.1139665.

**“The largest identity group, second only to heterosexual, was ‘mostly heterosexual’ for each sex and across both age groups, and that group was ‘larger than all the other non-heterosexual identities combined’” (abstract). “The bisexual category was the most unstable” with three quarters changing that status *in 6 years* (abstract). “[O]ver time, more bisexual and mostly heterosexual identified young adults of both sexes moved toward heterosexuality than toward homosexuality” (p 106).**

Savin-Williams, R., Joyner, K., & Rieger, R. (2012). Prevalence and stability of self-reported sexual orientation identity during young adulthood. *Archives of Sexual Behavior* 41: abstract, p. 106. <https://link.springer.com/article/10.1007/s10508-012-9913-y>; reviewed in Diamond & Rosky (2016), p. 7, Table 1; Diamond (2014), in *APA Handbook*, 1:638. Mostly heterosexual individuals generally do not identify as LGB and can get overlooked by popular surveys.

<sup>14</sup>ACLU of Rhode Island (March 22, 2017), *Why the ACLU of Rhode Island opposes conversion therapy, but also opposes legislation to ban it.* <http://www.riaclu.org/blog/post/the-aclu-of-rhode-island-opposes-conversion-therapy>



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<sup>15</sup>MEDICAL AND MENTAL HEALTH PROFESSIONAL ORGANIZATIONS have opposed bans on change-allowing therapy for an unwanted sexual orientation or unwanted gender identity and/or supported the right of clients to change-allowing therapy for unwanted same-sex attractions and/or unwanted gender identity: 4 Organization Joint Statement—American College of Pediatricians, American Association of Physicians and Surgeons, Christian Medical and Dental Association and Catholic Medical Association—Support Minors’ Right to Therapy (5-25-2017), (<https://www.acpeds.org/wordpress/wp-content/uploads/5.25.17-Joint-Therapy-letter-with-signatures.pdf>), American Association of Physicians and Surgeons (<https://aapsonline.org/california-proposes-bills-to-outlaw-self-determination-in-medical-therapy/>), American College of Pediatricians (<https://drive.google.com/file/d/0B9njBaZTrCfSZ09tRDFQaVVFN1hqVnpH-b3I5RTIqcTI5bHIB/view>), Christian Medical and Dental Association (see joint statement), Catholic Medical Association (<https://www.cathmed.org/resources/cma-protests-california-bill/>), Society of Catholic Social Scientists, International Network of Orthodox (Jewish) Mental Health Professionals, and Alliance for Therapeutic Choice and Scientific Integrity ([https://docs.wixstatic.com/ugd/ec16e9\\_1d6108cfa05d4a73921e0d0292c0bc91.pdf](https://docs.wixstatic.com/ugd/ec16e9_1d6108cfa05d4a73921e0d0292c0bc91.pdf)), American Association of Christian Counselors ( AACC Code of Ethics, 2014, 1-120f, 1-330, 1-340, <https://www.aacc.net/code-of-ethics-2/> )

<sup>16</sup>Rosario, M. & Schrimshaw, E. (2014). Theories and etiologies of sexual orientation. In Tolman, D. & Diamond, L., Co-Editors-in-Chief (2014). *APA Handbook of Sexuality and Psychology*, Washington D.C.: American Psychological Association. 1: 581-582.

<sup>17</sup> Personal communication between Laura Haynes, Ph.D. and Lee Beckstead, Ph.D. at the conference of the Alliance for Therapeutic Choice and Scientific Integrity in Salt Lake City, Utah on October 20, 2017, following Dr. Beckstead’s participation in a panel presentation.



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<sup>18</sup> NO RESEARCH THAT MEETS SCIENTIFIC STANDARDS HAS FOUND THAT CHANGE-ALLOWING THERAPY FOR SEXUAL ATTRACTIONS OR BEHAVIOR OR FOR GENDER IDENTITY INCONGRUENCE IS HARMFUL OR INEFFECTIVE FOR ADULTS OR MINORS.

***Most often cited studies re change-allowing therapy for sexual attraction or behavior:***

Sprigg, P., 2018, Are Sexual Orientation Change Efforts (SOCE) Effective? Are They Harmful? What the Evidence Shows, Family Research Council, <https://www.frc.org/issueanalysis/are-sexual-orientation-change-efforts-soce-effective-are-they-harmful-what-the-evidence-shows> :

Read the Full Version (Issue Analysis): <https://downloads.frc.org/EF/EF18104.pdf>

Read the Abbreviated Version (Issue Brief Report Summary): <https://downloads.frc.org/EF/EF18105.pdf>

***Recent study by et al (2018):***

This study researched a small sample of young adults who identify as LGBT and go to gay venues. It automatically overlooked minorities who are happy religious conservatives or who have successfully changed, because these people do not identify as LGB or go to gay venues. The researchers rejected people who initiated getting change-allowing therapy for themselves as adolescents—people who wanted change. The researchers did not define "conversion therapy." Was it is a parent's comment discouraging gay behavior but without effort to change the adolescent? Or 1-2 visits with a pastor not trained in counseling? It is not known how many participants even experienced therapy from a licensed, professional therapist who was actually trained in change-allowing therapy. So what the research actually studied is unknown.

(Ryan, C., Toomey, R., Diaz, R., & Russell, S. (2018), Parent-initiated sexual orientation change efforts with LGBT adolescents: Implications for young adult mental health and adjustment, *Journal of Homosexuality*, DOI:10.1080/00918369.2018.1538407, published online Nov. 7, 2018.)

**The APA Task Force Report said studies claiming to show negative outcomes of change-allowing therapy did not meet scientific standards. No conclusions can be drawn from them (pp. 37-42). It said it found "no valid causal evidence of harm" (p. 42).**

**It said it could draw no scientific conclusions about the safety or effectiveness of either affirmative (p. 91) or change-allowing (p. 42) therapy.**

**It said it based its tentative recommendations on [one-sided] anecdotal, not scientific, evidence. The report said its conclusions were tentative (p. 85).**

*APA Task Force on Appropriate Therapeutic Responses to Sexual Orientation. (2009). Report of the Task Force on Appropriate Therapeutic Responses to Sexual Orientation. Washington, DC: American Psychological Association..*

The APA task force chair refused expert change-allowing clinicians and researchers who offered to serve on the task force and chose LGB professionals who were already committed to the conclusions on political or philosophical grounds.

***Zucker re change-allowing therapy for gender incongruence:***

Zucker, K. (2018), The myth of persistence: Response to "A critical commentary on follow-up studies and 'desistance' theories about transgender and gender non-conforming children" by Temple Newhook et al. (2018), *International Journal of Transgenderism*, p. 9, <https://doi.org/10.1080/15532739.2018.1468293>



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<sup>19</sup> Contemporary change-allowing therapy uses *non-aversive* methods (APA Task Force Report, 2009, p. 82). Opponents of change-allowing therapy have relied heavily on the APA Task Force Report, because the APA is one of the few organizations, perhaps the only one, that attempted to conduct a research review as a basis for its position on change-allowing therapy. The Task Force said research on *both* affirmative therapy (p. 91) *and* sexual orientation change efforts (pp. 28, 82-83) did not meet meticulous standards for the Task Force to be willing to conclude whether either of these approaches was effective or safe. It found “no valid causal evidence” of harm for change-allowing therapy (p. 42). The APA Report said it based its conclusion on anecdotal evidence—*not* scientific evidence (p. 42). APA Task Force on Appropriate Therapeutic Responses to Sexual Orientation (2009), *Report of the Task Force on Appropriate Therapeutic Responses to Sexual Orientation*. Washington, DC: American Psychological Association.

• *Recent reviews find LGBT-affirmative therapy research still has many limitations:*  
O’Shaughnessy, T., & Speir, Z. (2017) The state of LGBTQ Affirmative Therapy Clinical Research: A mixed-methods systematic, p. 22. Preprint. DOI: 10.1037/sgd0000259.  
Catelan, R., Brandelli Costa, A., & de Macedo Lisboa, C. (2017) Psychological Interventions for Transgender Persons: A Scoping Review, *International Journal of Sexual Health*, 29:4, 325-337, DOI: 10.1080/19317611.2017. Hembree et al (2017).

<sup>20</sup> The APA Task Force Report said it discouraged sexual orientation change efforts based in part on its so-called “scientific findings” that sexual *identity* self-label changes but sexual *attraction* (“orientation”) does not (pp. 86, also pp. 2, 10, 22, 30—footnote 19, 85; sexual behavior and identity appear to have been taken as identity labels as well; pp. 14, 77). That was in 2009.

In 2014, the *APA Handbook of Sexuality and Psychology*, that the American Psychological Association declared authoritative (1:xvi), corrected the Task Force Report, concluding that indeed sexual attraction, behavior, and identity—all three—change. SEE ENDNOTE 16. Several rigorous studies have now established that many experience change—mostly toward or to exclusively heterosexual—and this is true internationally. SEE ENDNOTE 16.

One of the “three key findings” on which the Task Force “built” its recommendations was scientifically invalid, and the *APA Handbook* abandoned it.



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<sup>21</sup> The APA Task Force Report (2009) also said a key finding on which it based its conclusions is that same-sex sexuality is not caused by psychoanalytic factors or trauma (pp. 54-55, 63, 86).

But the *APA Handbook of Sexuality and Psychology* (2014) said psychoanalytic factors or “nurture” are always present.

“Biological explanations, however, do not entirely explain sexual orientation. Psychoanalytic contingencies are evident as main effects or in interaction with biological factors....A joint program of research by psychoanalysts and biologically oriented scientists may prove fruitful” (Rosario & Shrimshaw, 2014, in *APA Handbook of Sexuality and Psychology*, 1: 583). “The inconvenient reality....is that social behaviors are always jointly determined” by nature, nurture, and opportunity (Kleinplatz & Diamond 2014, *APA Handbook*, v. 1, pp. 256-257).

Whenever something is caused by nature or psychoanalytic factors, there is the likelihood that these factors and their effects are not invariably ideal or normal. It would be remarkable, if not a miracle, if trauma could effect seemingly every aspect of human experience except sex—including sexual identity and sexual orientation.

In fact, the *APA Handbook* also said there is evidence that childhood sexual abuse trauma may lead to having a same-sex partner for some, based on rigorous research, including a 30 year study of *documented* cases of childhood sexual abuse published right after the Task Force Report was published.

(Mustanski, B., Kuper, L., and Geene, G. (2014), *APA Handbook of Sexuality and Psychology*. Roberts, A., Glymour, M., & Koenen, K. (2014).) (Considering alternative explanations for the associations among childhood adversity, childhood abuse, and adult sexual orientation: Reply to Bailey and Bailey (2013) and Rind (2013), *Archives of Sexual Behavior* 43:191-196.)

The Task Force Report had based one of its “scientific facts”—that same-sex orientation is invariably normal and not caused by psychoanalytic factors or trauma—on studies that failed to meet its own scientific standards. (Rosik, C., 2012, Did the American Psychological Association’s report on appropriate therapeutic responses to sexual orientation apply its research standards consistently? A preliminary examination. *Journal of Human Sexuality* 4:68-84.)

The *APA Handbook* (2014) corrects the APA Task Force Report (2009): sexual orientation does change, has psychoanalytic causes, and may be caused by trauma.

Many professional organizations and the so-called SAMHSA report (that states it does *not* necessarily represent the views of SAMHSA) repeat the same unsupported claim that same-sex sexuality is invariably normal and can never be otherwise. AB 2943 and these reports are based on anecdotal evidence and scientific errors.



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<sup>22</sup> According to the American Psychological Association and abundant rigorous research internationally, most people who experience same-sex attraction also experience equal or greater opposite-sex attraction. Like many people, some both-sex attracted people desire to both conceive and raise children with their spouse. Many both-sex attracted people are in opposite-sex relationships by preference. They have a large capacity for sexual orientation change. They commonly shift along a spectrum that ranges exclusively homosexual to mostly homosexual to bisexual (about equally attracted to both sexes) to mostly heterosexual to exclusively heterosexual. They change mostly toward or to exclusively heterosexual. Even a change of 1 or 2 steps along that spectrum toward greater opposite-sex attraction may enable someone to live their dream. Shouldn't they have the right to counseling they may need and desire to explore their capacity to make that change?

"Hence, directly contrary to the conventional wisdom that individuals with exclusive same-sex attractions represent the prototypical 'type' of sexual-minority individual, and that those with bisexual patterns of attraction are infrequent exceptions, the opposite is true. Individuals with nonexclusive patterns of attraction are indisputably the 'norm,' and those with exclusive same-sex attractions are the exception." This pattern has been found internationally.

Diamond (2014), in *APA Handbook of Sexuality and Psychology*, 1:633; see also Diamond, L. & Rosky, C. (2016), *Scrutinizing Immutability: Research on Sexual Orientation and U.S. Legal Advocacy for Sexual Minorities*. *Journal of Sex Research*, 00:1-29. DOI: 10.1080/00224499.2016.1139665.

"The largest identity group, second only to heterosexual, was 'mostly heterosexual' for each sex and across both age groups, and that group was 'larger than all the other non-heterosexual identities combined'" (abstract). "The bisexual category was the most unstable" with three quarters changing that status *in 6 years* (abstract). "[O]ver time, more bisexual and mostly heterosexual identified young adults of both sexes moved toward heterosexuality than toward homosexuality" (p 106).

Savin-Williams, R., Joyner, K., & Rieger, R. (2012). Prevalence and stability of self-reported sexual orientation identity during young adulthood. *Archives of Sexual Behavior* 41: abstract, p. 106. <https://link.springer.com/article/10.1007/s10508-012-9913-y>; reviewed in Diamond & Rosky (2016), p. 7, Table 1; Diamond (2014), in *APA Handbook*, 1:638.

Mostly heterosexual individuals generally do not identify as LGB and can get overlooked by popular surveys.





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<sup>23</sup> AMERICAN PSYCHOLOGICAL ASSOCIATION'S *HANDBOOK ON SEXUAL ORIENTATION CHANGE*:

"...research on sexual minorities has long documented that many recall having undergone notable shifts in their patterns of sexual attractions, behaviors, or identities over time."

(Diamond, L., 2014, Chapter 20: Gender and same-sex sexuality, in *APA Handbook*, 1: 636.)

"Although change in adolescence and emerging adulthood is understandable, change in adulthood contradicts the prevailing view of consistency in sexual orientation."

(Rosario, M. & Schrimshaw, E., 2014, Chapter 18: Theories and etiologies of sexual orientation, in *APA Handbook*, 1: 562.)

"Over the course of life, individuals experience the following: (a) changes or fluctuations in sexual attractions, behaviors, and romantic partnerships;..."

Mustaky, B., Kuper, L., and Geene, G. (2014), Chapter 19: Development of sexual orientation and identity, in *APA Handbook*, v. 1, p. 619.

#### RESEARCH REVIEW ON CHANGE:

"[A]dvocates for sexual minorities have...[argued] that sexual orientation is a fixed, biologically based trait that cannot be chosen or changed" (p. 2) and "openly scolded" individuals who said they experienced otherwise (p. 20). "[A]rguments based on the immutability of sexual orientation are unscientific, given that scientific research does not indicate that sexual orientation is uniformly biologically determined at birth or that patterns of same-sex and other-sex attractions remain fixed over the life course" (p. 2). "We hope that our review of scientific findings and legal rulings regarding immutability will deal these arguments a final and fatal blow" (p. 3).

Diamond, L. & Rosky, C. (2016). Scrutinizing immutability: Research on sexual orientation and U.S. Legal Advocacy for sexual minorities. *Journal of Sex Research*, 00(00), 1-29.

REBUTTAL: Rosik, C. (2016). Research review: The quiet death of sexual orientation immutability; How science loses when political advocacy wins. <http://www.learntolove.co.za/images/Quiet-Death-of-Sexual-Orientation-Immutability.pdf>

Diamond is the co-editor-in-chief of the *APA Handbook of Sexuality and Psychology*. Rosky is a law professor who won the Human Rights Campaign "Equality" award. Rosik (not to be confused with Rosky) is a former president of the Alliance for Therapeutic Choice and Scientific Integrity. Diamond is a recognized expert in sexual orientation change through life experience, and Rosik is an expert in sexual orientation through therapy (an intensified life experience).

THE CAN'T CHANGE MYTH HARMS LGB PEOPLE WHO CHANGE. Many therapy ban supporters indicate sexual orientation cannot change, causing those who experience change through life experience to think they are the only one who has changed or something is wrong with them. Perpetrating the "can't change" myth is harmful. "Many of these women were rejected and stigmatized by their own lesbian communities when they embarked on these unexpected relationships" (Diamond, L., 2008, *Sexual Fluidity: Understanding Women's Love and Desire*. Cambridge, Mass.: Harvard Press, p. 114).

SOME WHO CHANGED THROUGH THERAPY express regret for the years they delayed change because they were told change was not possible through life experience or counseling.



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<sup>24</sup>According to the American Psychological Association and abundant rigorous research internationally, SEXUAL ATTRACTION, BEHAVIOR, AND IDENTITY—ALL THREE—SHIFT AND CHANGE FOR ADOLESCENTS OR ADULTS, WOMEN AND MEN, AND THE EXCEPTIONS ARE THE MINORITY. MOST PEOPLE WHO EXPERIENCE SAME-SEX ATTRACTION ALSO EXPERIENCE EQUAL OR GREATER OPPOSITE-SEX ATTRACTION. THEY COMMONLY SHIFT ALONG A SCALE that ranges from exclusively homosexual to mostly homosexual to bisexual (about equally attracted to both sexes) to mostly heterosexual to exclusively heterosexual. They change mostly toward or to exclusively heterosexual. Researchers who are themselves LGB consider a change of 1 or 2 steps along that spectrum to be sexual orientation change. **Even a change of 1 or 2 steps along that spectrum toward greater opposite-sex attraction may enable someone to live their dream. Shouldn't they have the right to counseling they may need and desire to explore their capacity to make that change?**

“Hence, directly contrary to the conventional wisdom that individuals with exclusive same-sex attractions represent the prototypical ‘type’ of sexual-minority individual, and that those with bisexual patterns of attraction are infrequent exceptions, the opposite is true. Individuals with nonexclusive patterns of attraction are indisputably the ‘norm,’ and those with exclusive same-sex attractions are the exception.” This pattern has been found internationally.

Diamond (2014), in *APA Handbook of Sexuality and Psychology*, 1:633; see also Diamond, L. & Rosky, C. (2016), Scrutinizing Immutability: Research on Sexual Orientation and U.S. Legal Advocacy for Sexual Minorities. *Journal of Sex Research*, 00:1-29. DOI: 10.1080/00224499.2016.1139665.

“The largest identity group, second only to heterosexual, was ‘mostly heterosexual’ for each sex and across both age groups, and that group was ‘larger than all the other non-heterosexual identities combined’” (abstract). “The bisexual category was the most unstable” with three quarters changing that status *in 6 years* (abstract). “[O]ver time, more bisexual and mostly heterosexual identified young adults of both sexes moved toward heterosexuality than toward homosexuality” (p 106).

Savin-Williams, R., Joyner, K., & Rieger, R. (2012). Prevalence and stability of self-reported sexual orientation identity during young adulthood. *Archives of Sexual Behavior* 41: abstract, p. 106. <https://link.springer.com/article/10.1007/s10508-012-9913-y>; reviewed in Diamond & Rosky (2016), p. 7, Table 1; Diamond (2014), in *APA Handbook*, 1:638.

Mostly heterosexual individuals generally do not identify as LGB and can get overlooked by research or popular surveys.



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<sup>25</sup> MANY ADOLESCENTS CHANGE SAME-SEX ATTRACTION, BEHAVIOR, AND IDENTITY.

- Most questioning adolescents become heterosexual.

Ott, M. Corliss, H., Wypij, D., Rosario, M., Austin, B. (2011) Stability and change in self-reported sexual orientation in young people: Application of mobility metrics. *Archives of Sexual Behavior*, 40: 519–532. doi:10.1007/s10508-010-9691-3; Author manuscript available in PMC 2012, June 1. Known as the “GUTS” study.

- 42% of all men who experienced same-sex behavior did so before age 18 and never again. Laumann, E.O., Gagnon, J.H., Michael, R.T., and Michaels, S. (1994). *The Social Organization of Sexuality: Sexual Practices in the United States*. Chicago and London: The University of Chicago Press.

- 48% of boys who were only attracted to the same sex at age 16 were only attracted to the opposite sex at age 17.

Udry, J.R., & Chantala, K. (2005). Risk factors differ according to same- sex and opposite-sex interest. *Journal of Biosocial Science*, 37, 481–497. <http://dx.doi.org/10.1017/S0021932004006765>

A question has been raised as to whether the boys may have been jokesters in giving these responses. But their rates of attraction change are compatible with rates of behavior change given by adults in the Laumann et al (1994) study above.



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<sup>26</sup> GENDER DYSPHORIA USUALLY RESOLVES NATURALLY BY LATE ADOLESCENCE: ENDOCRINE SOCIETY AND 6 CO-SPONSORING ORGANIZATIONS: 80-95% COME TO ACCEPT THEIR INNATE SEX.

Endocrine Society Guideline is co-sponsored by 6 additional US and European organizations: American Association of Clinical Endocrinologists, American Society of Andrology, European Society for Pediatric Endocrinology, European Society of Endocrinology, Pediatric Endocrine Society, and World Professional Association for Transgender Health.

(Hembree, W., Cohen-Kettenis, P., Gooren, L., Hannema, S., Meyer, W., Murad, M., Rosenthal, S., Safer, J., Tangpricha, V., & T'Sjoen, G., 2017, Endocrine treatment of gender-dysphoric/gender-incongruent persons: An Endocrine Society clinical practice guideline. *J Clin Endocrinol Metab*, 102:1–35, <http://dx.doi.org/10.1210/jc.2017-01658>, p.10.)

AMERICAN PSYCHIATRIC ASSOCIATION:

70-98% of boys and 50-88% of girls who are distressed by the sex of their bodies come to embrace their innate sex. Desistance rates calculated from persistence rates, DSM-5, p. 455.

(American Psychiatric Association, 201, Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition (DSM-5), Arlington, VA: American Psychiatric Association.)

AMERICAN PSYCHOLOGICAL ASSOCIATION:

No less than 75% come to embrace their bodies.

(Bockting, W., 2014, Chapter 24: Transgender Identity Development, In Tolman, D., & Diamond, L., Co-Editors-in-Chief (2014) *APA Handbook of Sexuality and Psychology*, Washington D.C.: American Psychological Association, Volume 1, p. 744.)

RESEARCH: About 80-95% COME TO ACCEPT THEIR INNATE SEX.

(Cohen-Kettenis P, Delemarre-van de Waal, H., & Gooren L. (2008), The treatment of adolescent transsexuals: Changing insights, *J Sex Med*, 5:1892–1897, DOI: 10.1111/j.1743-6109.2008.00870.x)

CRITIQUE OF ATTEMPTS TO DENY MOST COME TO ACCEPT THEIR SEX:

Zucker reviewed research on which the American Psychiatric Association, in the *Diagnostic and Statistical Manual*, based its figures of low persistence of gender incongruence. Zucker strongly criticized arguments attempting to call these figures a myth. He called their view “The Myth of Persistence”.

(Zucker, K. (2018), The myth of persistence: Response to “A critical commentary on follow-up studies and ‘desistance’ theories about transgender and gender non-conforming children” by Temple Newhook et al. (2018), *International Journal of Transgenderism*, pp. 2-3, 11, <https://doi.org/10.1080/15532739.2018.1468293>)



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<sup>27</sup>AFFIRMING CHILDREN TO DRESS AND LIVE AS THE OPPOSITE SEX STOPS NATURAL RESOLUTION AND LOCKS THEM IN TO BEING TRANSGENDER FOR LIFE:

Endocrine Society Guideline and 6 co-sponsoring organizations (2017, p. 12).

American Psychological Association (*APA Handbook of Sexuality and Psychology*, 2014, 1:744, 750).

PLACING MINORS ON PUBERTY BLOCKERS DOES NOT GIVE THEM A PAUSE;  
IT LOCKS THEM IN FOR LIFE.

“In other words rather than only 20% remaining with gender dysphoria, now 100% believe that their mind and body do not match after taking puberty blockers and will go on to dangerous cross sex hormones and irreversible surgical procedures.”

Laidlaw, M. (2018-10-24), The gender identity phantom, <http://gdworkinggroup.org/2018/10/24/the-gender-identity-phantom/> Dr. Laidlaw, endocrinologist, expert witness to CA legislators.

<sup>28</sup>PUBERTY BLOCKERS ARE EXPERIMENTAL—HIGH RISK:  
CAUSE SUDDEN CARDIAC DEATH:

may result from what is used as a puberty blocker with youth.

Gagliano-Juca, T., Traveison, T., Kantoff, P., Nguyen, P. L., Taplin, M-E, Kibel, A., Huang, G., Bearup, R., Schram, H., Manley, R., Beleva, Y., Edwards, R., Basaria, S. (2018). Androgen Deprivation Therapy is Associated with Prolongation of QTc Interval in Men With Prostate Cancer. *Journal of the Endocrine Society*, 2: 485-496.

MAY AFFECT BRAIN DEVELOPMENT

(Endocrine Society Guideline with 6 co-sponsoring organizations, 2017, pp. 14-15).

<sup>29</sup>PUBERTY BLOCKER TREATMENT IS NOT EVIDENCE-BASED:

As yet, we have *no* science on the long term medical effects of blocking puberty. This treatment is not evidence-based as supporters claim. The National Institutes of Health in 2015 began a study of transgender youth that will be the first to track medical effects of delaying puberty and only the second to follow its psychological impacts. It will not be completed until 2020.

This study is only for 5 years, not long enough to give long term/endpoint outcomes.

Olson, J., Garofalo, R., Rosenthal, St., Spack, N. (2015-2010) The Impact of Early Medical Treatment in Transgender Youth. National Institutes of Health. (Grant study description.) <http://grantome.com/grant/NIH/R01-HD082554-01A1>



## Protect the Right to Therapy

### Fact Sheet: Harms of Censoring Change-Allowing Therapy

#### <sup>30</sup>HIGH DOSE CROSS-SEX HORMONES ARE TOXIC—HIGH RISK:

WPATH, Standards of Care (2011), pp. 37-40, 50, 97-104.

#### RISKS FOR WOMEN:

polycythemia, weight gain, balding, sleep apnea, possible cardiovascular disease, diabetes type 2, bone density loss, and increased risk of cancers (breast, cervical, ovarian, and uterine).

#### RISKS FOR MEN:

gallstones, weight gain, blood clots (venous thromboembolisms), and sexual dysfunction; also possible cardiovascular disease, diabetes type 2, and breast cancer.

Hembree et al. (2017), pp. 21-25.

Testimony of Michael Laidlaw, M.D., Endocrinologist, CA Senate Judiciary Committee, 6/26/2018.

CAUSE 2 TO 2.5 TIMES HIGHER RATES OF DEATH FROM HEART DISEASE OR CANCER. See footnotes 20 and 22.

#### CROSS-SEX HORMONES INDUCE ABNORMAL, PATHOLOGIC STATES:

“There is no such thing as ‘trans puberty’. What happens is that the abnormal, pathologic state of hypogonadotropic hypogonadism is induced by puberty blocking medications. Then dangerous high dose hormones of the opposite sex are given to cause hirsutism (hair growth of the face, chest, back and abdomen) in females and gynecomastia (abnormal breast tissue growth) in males. The medications also atrophy and chemically degrade the sex organs.”

Laidlaw, M. (2018-10-24), The gender identity phantom, <http://gdworkinggroup.org/2018/10/24/the-gender-identity-phantom/> Dr. Laidlaw, endocrinologist, expert witness to CA legislators.

#### <sup>31</sup> CROSS-SEX HORMONES NOT EVIDENCE BASED:

WPATH Standards of Care (2011), p. 24. “To date, no controlled clinical trials of any feminizing/masculinizing hormone regimen have been conducted to evaluate safety or efficacy in producing physical transition.”

Endocrine Society Guideline (with 6 co-sponsoring organizations) (2017):

See ratings (indicated by a row of circles) of referenced research throughout the Guideline indicating low and very low quality research.

<sup>32</sup> Endocrine Society Guideline (Hembree, et al, 2017), WPATH Standards of Care (2011). World Professional Association for Transgender Health (WPATH) (2011). Standards of Care for the Health of Transsexual, Transgender, and Gender Nonconforming People, [http://www.wpath.org/site\\_page.cfm?pk\\_association\\_webpage\\_menu=1351](http://www.wpath.org/site_page.cfm?pk_association_webpage_menu=1351)

<sup>33</sup> Dhejne C, Lichtenstein P, Boman M, Johansson ALV, La˚ngstro˚m N, et al. (2011) Long-term follow-up of transsexual persons undergoing sex reassignment surgery: Cohort study in Sweden. PLoS ONE 6(2): e16885. doi:10.1371/journal.pone.0016885. Sweden is one of the most trans-affirmative and liberal nations in the world.



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<sup>34</sup> THESE DEVASTATING OUTCOMES ARE FROM THE BEST RESEARCH AVAILABLE:.

The Centers for Medicare & Medicaid Services (CMS), 2016 (Obama administration) reported this study (Dhejne et al, 2011) was one of only two studies that assessed long term endpoint outcomes (request for surgical reassignment reversal and morbidity/mortality). The CMS report said about this study that showed these devastating outcomes:

*Although the data are observational, they are robust because the Swedish national database is comprehensive (including all patients for which the government had paid for surgical services) and is notable for uniform criteria to qualify for treatment and financial coverage by the government...*

*Dhejne et al., (2011) tracked all patients who had undergone reassignment surgery (mean age 35.1 years) over a 30 year interval and compared them to 6,480 matched controls. The study identified increased mortality and psychiatric hospitalization compared to the matched controls. The mortality was primarily due to completed suicides (19.1-fold greater than in control Swedes), but death due to neoplasm and cardiovascular disease was increased 2 to 2.5 times as well. We note, mortality from this patient population did not become apparent until after 10 years. The risk for psychiatric hospitalization was 2.8 times greater than in controls even after adjustment for prior psychiatric disease (18%). The risk for attempted suicide was greater in male-to-female patients regardless of the gender of the control. Further, we cannot exclude therapeutic interventions as a cause of the observed excess morbidity and mortality.*

Centers for Medicare & Medicaid Services, August 30, 2016, Decision Memo for Gender Dysphoria and Gender Reassignment Surgery (CAG-00446N), <https://www.cms.gov/medicare-coverage-database/details/nca-decision-memo.aspx?NCAId=282>.

<sup>35</sup>MEDICAL TRANSITIONING TREATMENT IS CONTROVERSIAL IN THE MEDICAL PROFESSION ITSELF:

ACLU of Rhode Island (March 22, 2017), blog, <http://www.riaclu.org/blog/post/the-aclu-of-rhode-island-opposes-conversion-therapy>

Cantor, J. (2018), American Academy of Pediatrics policy and trans-kids: Fact-checking. Sexology Today! <http://www.sexologytoday.org/2018/10/american-academy-of-pediatrics-policy.html>

[gdworkinggroup.org](http://gdworkinggroup.org)

[YouthTransCriticalProfessionals.org](http://YouthTransCriticalProfessionals.org)

[4thWaveNow.com](http://4thWaveNow.com)



## Protect the Right to Therapy

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<sup>36</sup> Sex is innate. Sexual orientation, gender identity, and nonconforming sexual expression are not innate. Identical twins have the same genes, pre-natal hormones, and brain microstructures. If a trait is determined by these factors, both twins will have the same trait in nearly 100% of sets of identical twins. Here's what research has found:

If one twin is male, the other is male also nearly 100% of time.

If one twin is female, the other is female also nearly 100% of the time.

If one twin is homosexual, other is homosexual 14% of the time.

If one twin is transsexual, the other is transsexual 28% of the time.

If one twin is gender non conforming, the other usually is not.

References:

Transsexual:

Older study reported in Bockting, W. (2014). Chapter 24: Transgender Identity Development. In Tolman, D., & Diamond, L., Co-Editors-in-Chief (2014) *APA Handbook of Sexuality and Psychology* (2 volumes). Washington D.C.: American Psychological Association, Volume 1, pp. . 739-758.

Same study updated by adding participants: Diamond, M., 2013, Transsexuality Among Twins: Identity Concordance, Transition, Rearing, and Orientation, *International Journal of Transgenderism*, 14:1, 24-38.

Figure of 20% in abstract corrected to 28% by calculation from Table 5, p. 28, as reported in Haynes, L., (September 27, 2016), The American Psychological Association Says Born-That-Way-and-Can't-Change Is Not True of Sexual Orientation and Gender Dysphoria, p. 6, [https://docs.wixstatic.com/ugd/ec16e9\\_a50743b8ec98406aa43437c6ffe1c697.pdf](https://docs.wixstatic.com/ugd/ec16e9_a50743b8ec98406aa43437c6ffe1c697.pdf)

"Transsexual" was defined in the study as a person who had been living as the opposite sex. Because the study used a small convenience sample, the figure of 28% can be expected to decrease as more representative and larger samples are studied.

Homosexual:

Bailey, J., Vasey, P. Diamond, L., Breedlove, S., Vilain, E., & Epprecht, M. (2016). Sexual orientation, controversy, and science. *Psychological Science in the Public Interest*, 17:74-76. DOI: 10.1177/1529100616637616.

Pairwise concordance = 14%, calculated from probandwise concordance = 25%; 28/114 = about 25%; see bottom of Table 4 on p. 75. Pairwise concordance used to make figures between this research and M. Diamond's study comparable.

Diamond, L. & Rosky, C. (2016). Scrutinizing Immutability: Research on Sexual Orientation and U.S. Legal Advocacy for Sexual Minorities. *Journal of Sex Research*, 00:4. DOI: 10.1080/00224499.2016.1139665

Non conforming behavior: Bailey et al (2016), p. 76.





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#### <sup>37</sup>PRENATAL HORMONES DO NOT DETERMINE SAME-SEX ATTRACTION:

“The overall body of evidence is mixed (as critiqued by Jordan-Young, 2012), again suggesting that prenatal hormones potentially contribute to same-sex sexuality in some individuals but do not determine it....Hence, as with the genetic data, the evidence [for prenatal hormones] does not support straightforward causation” (Diamond & Rosky, 2016, p. 6).

#### Prenatal Hormones—The Fraternal Birth Order Effect (FBO) Theory:

- Applies to about 15% to 28 1/2% of males, no females.
- Might contribute 33%-34% of the variance— about as much as genes contribute—32% or “somewhat” (p. 76)—but does not cause homosexuality. There still have to be environmental causes.

(Bailey et al, 2016, pp. 76, 79)

#### Some Problems with the fraternal birth order (FBO) theory:

- Male identical twins have the same number of older brothers, but, if one is homosexual, the other usually is not.
- Some very large, rigorous studies failed to find the FBO effect.

Bailey, J., Vasey, P. Diamond, L., Breedlove, S., Vilain, E., & Epprecht, M. (2016). Sexual orientation, controversy, and science. *Psychological Science in the Public Interest*, 17:45-101. DOI: 10.1177/1529100616637616.

Diamond, L. & Rosky, C. (2016). Scrutinizing immutability: Research on sexual orientation and U.S. Legal Advocacy for Sexual Minorities. *Journal of Sex Research*, 00(00), 1-29, DOI: 10.1080/00224499.2016.1139665



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<sup>38</sup> AMERICAN PSYCHOLOGICAL ASSOCIATION AND RESEARCH SAY THERE IS NO GAY GENE:

“[W]e are far from identifying potential genes that may explain not just male homosexuality but also female homosexuality.” (Rosario & Schrimshaw 2014, in *APA Handbook*, 1: 579.)

“Based on what we know about molecular genetics findings in general...we expect that any sexual-orientation genes will have small effects individually” (Bailey et al, 2016, p. 77).

In 2014, the *APA Handbook* said, “Those [genetic] contributions appear to be substantial, given genetic heritability estimates of approximately 40% to 50% for both sexes” (Rosario & Schrimshaw 2014, in *APA Handbook*, 1: 579). That level of heritability was downrated to 32% in 2016 by the reviews of both Bailey et al (p. 76) and Diamond and Rosky (p. 4). “Our best estimate of the magnitude of genetic effects is moderate—certainly not overwhelming. In contrast, the evidence for environmental influence is unequivocal” (Bailey et al, 2016, p. 76).

The genetic effect on sexual orientation is now estimated to be less than estimates of heritability “for a range of characteristics that are not widely considered immutable [unchangeable], such as being divorced, smoking, having low back pain, and feeling body dissatisfaction” (which have heritability rates of 40% to 60%, Diamond & Rosky, 2016, p. 4).

“Based on the evidence from twin studies, we believe that we can already provide a qualified answer to the question, ‘Is sexual orientation genetic?’ That answer is ‘Probably somewhat genetic, but not mostly so’....There can be little doubt that sexual orientation is environmentally influenced” (Bailey et al., 2016, p. 76; see also Diamond & Rosky, 2016, p. 4).

“[W]e focus on one of the largest recent studies, whose findings align with the findings of other similar studies. Researchers analyzed the genomes of more than 23,000 men and women that had been collected by the company 23andMe, and found no genetic loci that were significantly associated with sexual orientation in either men or women (Drabant et al., 2012). However, the marker that came closest to statistical significance among men was located on pericentromeric chromosome 8, a region which had been identified as a possible marker for male sexual orientation in a previous genome-wide association study (Mustanski et al., 2005). As with the findings of heritability, this supports a genetic contribution to sexual orientation, but not genetic determination” (Diamond & Rosky, 2016, p. 4).

#### Epigenetics

“In essence, the current scientific revolution in our understanding of the human epigenome challenges the very notion of being ‘born gay,’ along with the notion of being ‘born’ with *any* complex trait. Rather, our genetic legacy is dynamic, developmental, and environmentally embedded” (Diamond & Rosky, 2016, p. 4, emphasis by the authors). The same principle would apply to the notion of being “born” with the complex traits of transgender, transsexual, or nonconforming gender identity or expression.



## Protect the Right to Therapy

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### Fact Sheet: Harms of Censoring Change-Allowing Therapy

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<sup>39</sup> SAME-SEX ATTRACTION OR BEHAVIOR IS NOT SIMPLY BIOLOGICALLY CAUSED, ALWAYS HAS PSYCHOLOGICAL CAUSES:

“The inconvenient reality....is that social behaviors are always jointly determined” by nature, nurture, and opportunity.

(Kleinplatz, P. & Diamond, L., 2014, in *APA Handbook 1*: 256-257.)

“Nurture” in psychological terms usually designates family experiences in particular.

<sup>40</sup> PSYCHOANALYTIC CAUSES OF SAME-SEX SEXUALITY:

“Biological explanations, however, do not entirely explain sexual orientation. Psychoanalytic contingencies are evident as main effects or in interaction with biological factors....A joint program of research by psychoanalysts and biologically oriented scientists may prove fruitful” (Rosario & Schrimshaw, 2014, in *APA Handbook of Sexuality and Psychology, 1*: 583).

*Regarding family dynamics:* The APA Task Force accepted uncritically studies that did not meet its own scientific standards but that supported the view that sexual orientation is not caused by psychoanalytic factors/family dynamics or trauma (pp. 82, 86). It made this view a “key” research finding on which it based its conclusions. Yet it held studies that supported change-allowing therapy to its highest standards meticulously and said no conclusions could be drawn. If the Task Force had applied its standards consistently, it would have said it could draw no conclusions as to the causes of same-sex sexuality or concluded that people change their sexual orientation through therapy. “[T]here appears to be substantial bias.”

Rosik, C. (2012). Did the American Psychological Association’s *Report on Appropriate Therapeutic Responses to Sexual Orientation* apply its research standards consistently? A preliminary examination. *Journal of Human Sexuality, 4*:70-85. <http://media.wix.com/ugd/>



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<sup>41</sup> CHILDHOOD SEXUAL ABUSE MAY LEAD TO HAVING A SAME-SEX PARTNER FOR SOME. A THERAPY BAN MANDATES THERAPISTS TO AFFIRM FEELINGS AND BEHAVIORS VICTIMS FEEL WERE FORCED ON THEM BY PERPETRATORS. THIS IS HURTFUL.

The *APA Handbook of Sexuality and Psychology*, that the American Psychological Association has declared authoritative, says that, unlike skin color, sexual attraction is not simply biologically caused; there are psychological causes such as childhood sexual abuse. It reviews research, including a rigorous, 30 year study of documented cases of childhood sexual abuse, that shows “associative and potentially causal links” between childhood sexual abuse and same-sex sexuality. Is it more compassionate to relieve sexual abuse victims of feelings and behaviors they don’t want or to tell them they have to live with them? More from the *APA Handbook of Sexuality and Psychology* (2014) on the 30 year study:

The largest reviews of the literature in this area indicated that MSM [men who have sex with men] report rates of childhood sexual abuse that are approximately three times higher than that of the general male population (Purcell, Malow, Dolezal, & Carballo-Diequez, 2004). One of the most methodologically rigorous studies in this area used a prospective longitudinal case-control design that involved following abused and matched nonabused children into adulthood 30 years later. It found that men with documented histories of childhood sexual abuse had 6.75 times greater odds than controls of reporting ever having same-sex sexual partners (H. W. Wilson & Widom, 2010). To help control for possible confounding factors, the authors conducted post hoc analyses controlling for number of lifetime sexual partners and sex work, but the association remained. The effect in women was smaller (odds ratio 2.11) and a statistical trend ( $p .09$ ). (Mustanski, B., Kuper, L., and Geene, G. (2014), *APA Handbook of Sexuality and Psychology*.)

*Regarding trauma:* The Task Force accepted uncritically studies that did not meet its own scientific standards but that supported the view that sexual orientation is not caused by psychoanalytic factors/family dynamics or trauma (pp. 82, 86). It made this view a “key” research finding on which it based its conclusions. Yet it held studies that supported change-allowing therapy to its highest standards meticulously and said no conclusions could be drawn. If the Task Force had applied its standards consistently, it would have said it could draw no conclusions as to the causes of same-sex sexuality or concluded that people change their sexual orientation through therapy. “[T]here appears to be substantial bias.”

Rosik, C. (2012). Did the American Psychological Association’s *Report on Appropriate Therapeutic Responses to Sexual Orientation* apply its research standards consistently? A preliminary examination. *Journal of Human Sexuality*, 4:70-85. <http://media.wix.com/ugd/>



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<sup>42</sup> 10 PROFESSIONAL ORGANIZATIONS AGREE GENDER IDENTITY INCONGRUENCE HAS PSYCHOLOGICAL CAUSES:

Endocrine Society and 6 co-sponsoring organizations:

“Results of studies from a variety of biomedical disciplines—genetic, endocrine, and neuroanatomic—support the concept that gender identity and/or gender expression likely reflect a complex interplay of biological, environmental, and cultural factors.”

Endocrine Society Guideline (2017), pp. 6-7.

The American Psychological Association’s *Handbook of Sexuality and Psychology* says transgender identity is not simply biologically determined, has psychological causes, and may be pathological. Affirmative treatment may neglect individual problems gender dysphoric minors are experiencing.

*APA Handbook of Sexuality and Psychology* (2014), 1: 743-744, 750.

American Psychiatric Association: “[I]n contrast to certain social constructionist theories, biological factors are seen as contributing, in interaction with social and psychological factors, to gender development.” (DSM-5, p. 451) “Overall, current evidence is insufficient to label gender dysphoria without a disorder of sex development as a form of intersexuality limited to the central nervous system.” (DSM-5, p. 457).

American Association of Pediatricians: Gender identity “results from a multifaceted interaction of biological traits, developmental influences, and environmental conditions.” p. 2. See also p. 4. Rafferty J, AAP Committee on Psychosocial Aspects of Child and Family Health, AAP Committee on Adolescence, AAP Section on Lesbian, Gay, Bisexual, and Transgender Health and Wellness (2018), Ensuring Comprehensive Care and Support for Transgender and Gender Diverse Children and Adolescents. *Pediatrics* 142(4): e20182162.

<sup>43</sup> TRANSGENDER IDENTITY MAY HAVE PATHOLOGICAL CAUSES:

The American Psychological Association’s *Handbook of Sexuality and Psychology* says transgender identity has psychological causes and may be pathological. It also says affirmative treatment may neglect individual problems gender dysphoric minors are experiencing.

*APA Handbook of Sexuality and Psychology* (2014), 1: 743-744, 750.

<sup>44</sup> “Gender dysphoria” may be “secondary to or better accounted for by other diagnoses.” WPATH(2011). Standards of Care, [http://www.wpath.org/site\\_page.cfm?pk\\_association\\_webpage\\_menu=1351](http://www.wpath.org/site_page.cfm?pk_association_webpage_menu=1351), p. 24

Psychological disorders may diminish or resolve through insight from life-experience or psychotherapy. Sex change, however, treats only the symptom of gender distress—and does not treat a psychological disorder (such as gender trauma) that may be causing it—leading some to sex-change regret after the “new car smell” wears off.

Trans regret testimonies of underlying gender trauma: [sexchangeregret.com](http://sexchangeregret.com), [tranzformed.org](http://tranzformed.org).



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<sup>45</sup> American Psychological Association's *APA Handbook of Sexuality and Psychology* cautions that affirmative treatment may neglect treating individual problems a child is experiencing. Bockting, W. (2014). Chapter 24: Transgender Identity Development. In Tolman, D., & Diamond, L., Co-Editors-in-Chief (2014) *APA Handbook of Sexuality and Psychology* (2 volumes). Washington D.C.: American Psychological Association, 1: 744, 750.

<sup>46</sup> WPATH(2011). Standards of Care, [http://www.wpath.org/site\\_page.cfm?pk\\_association\\_webpage\\_menu=1351](http://www.wpath.org/site_page.cfm?pk_association_webpage_menu=1351), p. 24.

<sup>47</sup> World-wide, 90% of people who commit suicide have mental disorders.

Cavanagh, J., Carson, A., Sharpe, M. & Lawrie, S. (2003), Psychological autopsy studies of suicide: a systematic review, *Psychological Medicine*, 33: 395–405, Cambridge University Press, DOI: 10.1017/S0033291702006943

Among adolescents in the U.S. who attempt suicide, 96% had at least one pre-existing mental disorder.

Nock, M., Green, J., Hwang, I., McLaughlin, K., Sampson, N., Zaslavsky, A., and Kessler, R. (2013), Prevalence, correlates and treatment of lifetime suicidal behavior among adolescents: Results from the National Comorbidity Survey Replication—Adolescent Supplement (NCS-A), *JAMA Psychiatry*, 70(3): p. 18, Table 3, doi: 10.1001/2013.jamapsychiatry.55.



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<sup>48</sup> WHAT CHANGE-ALLOWING THERAPY ACTUALLY IS:

**Opponents use the term “conversion therapy” like a kitchen sink into which they throw all kinds of things that are not even therapy, and certainly are not change-allowing therapy—so they can make it sound like therapists are doing things they are not.**

**Reparative therapy is trademarked. It is not “conversion therapy” which is an ill-defined term made up by opponents.**

**The United States Patent and Trademark Office accurately defines what Reparative Therapy™ actually is:** “Mental health therapy services, namely, voluntary psychotherapy for individuals seeking to explore underlying psychodynamic factors which may have led to the development of unwanted same-sex attractions, in which treatment interventions are directed toward resolution of underlying gender-related traumas reported by the client using evidence-based treatment interventions.”

The *APA Handbook* affirmed same-sex sexual orientation is caused by *psychoanalytic* factors, may be caused by sexual abuse *trauma*, and often *changes*. The *APA Handbook* (2014) thereby corrected the APA Task Force Report (2009) that had relied on studies that did not meet its own criteria.

We use evidence-based treatments for trauma and sexual addictions and well established practices used in clinics around the world and supported by several professional organizations. Change-allowing therapy today does not try to change sexual orientation or gender identity or guarantee change. Changes are by-products of client-directed therapy.

<sup>49</sup> ACLU of Rhode Island (March 22, 2017), Why the ACLU of Rhode Island opposes conversion therapy, but also opposes legislation to ban it. <http://www.riaclu.org/blog/post/the-aclu-of-rhode-island-opposes-conversion-therapy>.



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<sup>50</sup>**Therapists will be required to discriminate against clients based on sexual orientation. Many kinds of symptoms and recognized disorders**—from unwanted emotional and sexual ties that a sexual abuse victim may experience toward an abuser, to desire of adolescents to have sex with much younger children, to compulsive sexual thoughts, to pornography addiction or sexual addiction, and more—**could be treated only if directed toward the opposite, not same, sex.**

Joseph Nicolosi, Jr., Ph.D. (Feb. 14, 2018). Expert testimony in Maine, audio and written,

<http://www.therapyequality.org/testimony-dr-joseph-nicolosi-jr>.

Joseph Nicolosi, Jr., Ph.D. (April 3, 2018). Expert testimony in California in opposition to AB 2943, Privacy and Consumer Protection Committee. [http://calchannel.granicus.com/MediaPlayer.php?view\\_id=7&clip\\_id=5330](http://calchannel.granicus.com/MediaPlayer.php?view_id=7&clip_id=5330).

<sup>51</sup> LGB-AFFIRMATIVE THERAPY only helps individuals clarify their sexual identity self-label (in case they are interested in that, but does not help to change same-sex behavior or attraction) and offers support to cope with the suffering of not diminishing their unwanted feelings, but does not lift a finger to offer trauma treatments that are open to change (APA Task Force, 2009, p. 4).

Transgender-affirmative treatment offers body-harming treatments, not psychological intervention to resolve distress over ones innate body sex and help the client embrace their innate body.

THERE IS NO RESEARCH THAT SHOWS THAT AFFIRMATIVE THERAPY IS SAFER OR MORE EFFECTIVE THAN CHANGE-ALLOWING THERAPY.





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<sup>52</sup>Lefevor, G., Beckstead, L., Schow, R., Raynes, M., Mansfield, T., Rosik, C. (2019), Satisfaction and health within four sexual identity relationship options, *Journal of Sex and Marital Therapy*, <http://www.tandfonline.com/action/showCitFormats?doi=10.1080/0092623X.2018.1531333>

Also, a study of happiness in a nationally representative sample of LGBT individuals reported: “Surprisingly, no significant differences [in happiness] are found between mainline Protestants (whose church doctrine often accepts same-sex relations) and evangelical Protestants (whose church doctrine often condemns same-sex relations).” (Abstract)

Barringer, M., Gay, D. (2017), Happily religious: The surprising sources of happiness among lesbian, gay, bisexual, and transgender adults, *Sociological Inquiry*, 87, 75–96, DOI: 10.1111/soin.12154

Rosik concludes from studies like these that research on psychology and religion in sexual minorities “almost always overlooks non-LGB identified and satisfied religiously conservative sexual minority folks, so it should not be generalized to them. When studies include them, as ours does, or is taken from large, representative samples, the results are not always (often not?) in keeping with the conventional APA wisdom.” (Private communication, 1/30/2019)

For example, Ryan et al (2018) leaves out “non-LGB identified and satisfied religiously conservative sexual minority folks,” as Rosik puts it, because they studied only LGBT identified young adults they found in gay venues.

<sup>53</sup> Alliance Defending Freedom (May 9, 2017). Legal Analysis of Amendment No 640 to Nevada SB 201.

## Code of Virginia

### § 2.2-4002.1. (Effective January 1, 2019) Guidance documents.

A. Guidance documents shall be exempt from the provisions of this chapter, pursuant to this section. Guidance documents do not include agency (i) rulings and advisory opinions, (ii) forms and instructions, (iii) bulletins and legislative summaries, (iv) studies and reports, and (v) internal manuals and memoranda.

B. The agency that develops a guidance document shall certify that the document conforms to the definition of a guidance document in § 2.2-4101.

The guidance document shall be subject to a 30-day public comment period, to include public comment through the Virginia Regulatory Town Hall website, after publication in the Virginia Register of Regulations and prior to its effective date.

The agency shall provide notice of the opportunity for public comment to interested parties as identified under § 2.2-4007.02 prior to the start of the 30-day public comment period.

C. If a written comment is received during a public comment period asserting that the guidance document is contrary to state law or regulation, or that the document should not be exempted from the provisions of this chapter, the effective date of the guidance document by the agency shall be delayed for an additional 30-day period. During this additional period, the agency shall respond to any such comments in writing by certified mail to the commenter or by posting the response electronically in a manner consistent with the provisions for publication of comments on regulations provided in this chapter. Any person who remains aggrieved after the effective date of the final guidance document may avail himself of the remedies articulated in Article 5 (§ 2.2-4025 et seq.).

2018, c. 820.



Virginia Department of Health Professions  
Cash Balance  
As of February 28, 2019

	<u>108- Psychology</u>
<b>Board Cash Balance as June 30, 2018</b>	\$ 917,117
<b>YTD FY19 Revenue</b>	83,761
<b>Less: YTD FY19 Direct and Allocated Expenditures</b>	<u>372,682</u>
<b>Board Cash Balance as February 28, 2019</b>	<u><u>628,196</u></u>

Virginia Department of Health Professions  
 Revenue and Expenditures Summary  
 Department 10800 - Psychology  
 For the Period Beginning July 1, 2018 and Ending February 28, 2019

Account Number	Account Description	Amount	Budget	Amount	
				Under/(Over) Budget	% of Budget
<b>4002400</b>	<b>Fee Revenue</b>				
4002401	Application Fee	46,485.00	73,025.00	26,540.00	63.66%
4002406	License & Renewal Fee	27,896.00	539,030.00	511,134.00	5.18%
4002407	Dup. License Certificate Fee	185.00	115.00	(70.00)	160.87%
4002409	Board Endorsement - Out	2,975.00	2,050.00	(925.00)	145.12%
4002421	Monetary Penalty & Late Fees	6,100.00	5,755.00	(345.00)	105.99%
4002432	Misc. Fee (Bad Check Fee)	35.00	70.00	35.00	50.00%
	<b>Total Fee Revenue</b>	<u>83,676.00</u>	<u>620,045.00</u>	<u>536,369.00</u>	<u>13.50%</u>
<b>4003000</b>	<b>Sales of Prop. &amp; Commodities</b>				
4003020	Misc. Sales-Dishonored Payments	85.00	-	(85.00)	0.00%
	<b>Total Sales of Prop. &amp; Commodities</b>	<u>85.00</u>	<u>-</u>	<u>(85.00)</u>	<u>0.00%</u>
	<b>Total Revenue</b>	<u>83,761.00</u>	<u>620,045.00</u>	<u>536,284.00</u>	<u>13.51%</u>
<b>5011110</b>	<b>Employer Retirement Contrib.</b>	4,904.88	6,926.00	2,021.12	70.82%
5011120	Fed Old-Age Ins- Sal St Emp	2,732.51	3,919.00	1,186.49	69.72%
5011140	Group Insurance	475.32	672.00	196.68	70.73%
5011150	Medical/Hospitalization Ins.	5,819.50	8,244.00	2,424.50	70.59%
5011160	Retiree Medical/Hospitalizatn	424.70	600.00	175.30	70.78%
5011170	Long term Disability Ins	225.77	318.00	92.23	71.00%
	<b>Total Employee Benefits</b>	<u>14,582.68</u>	<u>20,679.00</u>	<u>6,096.32</u>	<u>70.52%</u>
<b>5011200</b>	<b>Salaries</b>				
5011230	Salaries, Classified	36,282.93	51,223.00	14,940.07	70.83%
	<b>Total Salaries</b>	<u>36,282.93</u>	<u>51,223.00</u>	<u>14,940.07</u>	<u>70.83%</u>
<b>5011300</b>	<b>Special Payments</b>				
5011340	Specified Per Diem Payment	1,100.00	2,350.00	1,250.00	46.81%
5011380	Deferred Compnstn Match Pmts	340.00	480.00	140.00	70.83%
	<b>Total Special Payments</b>	<u>1,440.00</u>	<u>2,830.00</u>	<u>1,390.00</u>	<u>50.88%</u>
5011930	Turnover/Vacancy Benefits		-	-	0.00%
	<b>Total Personal Services</b>	<u>52,305.61</u>	<u>74,732.00</u>	<u>22,426.39</u>	<u>69.99%</u>
<b>5012000</b>	<b>Contractual Svcs</b>				
<b>5012100</b>	<b>Communication Services</b>				
5012110	Express Services	-	172.00	172.00	0.00%
5012140	Postal Services	2,978.56	4,560.00	1,581.44	65.32%
5012150	Printing Services	73.06	82.00	8.94	89.10%
5012160	Telecommunications Svcs (VITA)	186.78	425.00	238.22	43.95%
	<b>Total Communication Services</b>	<u>3,238.40</u>	<u>5,239.00</u>	<u>2,000.60</u>	<u>61.81%</u>
<b>5012200</b>	<b>Employee Development Services</b>				
5012210	Organization Memberships	-	2,750.00	2,750.00	0.00%
	<b>Total Employee Development Services</b>	<u>-</u>	<u>2,750.00</u>	<u>2,750.00</u>	<u>0.00%</u>
5012400	Mgmnt and Informational Svcs	-			
5012420	Fiscal Services	6,391.05	8,270.00	1,878.95	77.28%
5012440	Management Services	74.68	330.00	255.32	22.63%

Virginia Department of Health Professions  
Revenue and Expenditures Summary  
Department 10800 - Psychology  
For the Period Beginning July 1, 2018 and Ending February 28, 2019

Account Number	Account Description	Amount	Budget	Amount	
				Under/(Over)	% of Budget
5012450	Personnel Developmnt Services	42.00	-	(42.00)	0.00%
5012460	Public Infrmtnl & Relatn Svcs	156.00	-	(156.00)	0.00%
5012470	Legal Services	175.00	250.00	75.00	70.00%
	<b>Total Mgmt and Informational Svcs</b>	<b>6,838.73</b>	<b>8,850.00</b>	<b>2,011.27</b>	<b>77.27%</b>
5012500	Repair and Maintenance Svcs				
5012530	Equipment Repair & Maint Srvc	475.21	-	(475.21)	0.00%
	<b>Total Repair and Maintenance Svcs</b>	<b>475.21</b>	<b>-</b>	<b>(475.21)</b>	<b>0.00%</b>
5012600	Support Services				
5012630	Clerical Services	279.85	-	(279.85)	0.00%
5012640	Food & Dietary Services	633.99	432.00	(201.99)	146.76%
5012660	Manual Labor Services	180.96	427.00	246.04	42.38%
5012670	Production Services	942.80	935.00	(7.80)	100.83%
5012680	Skilled Services	5,743.39	13,815.00	8,071.61	41.57%
	<b>Total Support Services</b>	<b>7,780.99</b>	<b>15,609.00</b>	<b>7,828.01</b>	<b>49.85%</b>
5012800	Transportation Services				
5012820	Travel, Personal Vehicle	2,511.78	3,572.00	1,060.22	70.32%
5012830	Travel, Public Carriers	2,847.73	-	(2,847.73)	0.00%
5012850	Travel, Subsistence & Lodging	1,851.74	1,101.00	(750.74)	168.19%
5012880	Trvl, Meal Reimb- Not Rprtble	880.50	1,139.00	258.50	77.30%
	<b>Total Transportation Services</b>	<b>8,091.75</b>	<b>5,812.00</b>	<b>(2,279.75)</b>	<b>139.22%</b>
	<b>Total Contractual Svcs</b>	<b>26,425.08</b>	<b>38,260.00</b>	<b>11,834.92</b>	<b>69.07%</b>
5013000	Supplies And Materials				
5013100	Administrative Supplies				
5013120	Office Supplies	479.77	348.00	(131.77)	137.86%
5013130	Stationery and Forms	-	1,554.00	1,554.00	0.00%
	<b>Total Administrative Supplies</b>	<b>479.77</b>	<b>1,902.00</b>	<b>1,422.23</b>	<b>25.22%</b>
5013500	Repair and Maint. Supplies				
5013520	Custodial Repair & Maint Matrl	1.95	2.00	0.05	97.50%
5013530	Electrcal Repair & Maint Matrl	0.56	-	(0.56)	0.00%
	<b>Total Repair and Maint. Supplies</b>	<b>2.51</b>	<b>2.00</b>	<b>(0.51)</b>	<b>125.50%</b>
5013600	Residential Supplies				
5013620	Food and Dietary Supplies	-	26.00	26.00	0.00%
5013630	Food Service Supplies	-	100.00	100.00	0.00%
5013640	Laundry and Linen Supplies	2.22	-	(2.22)	0.00%
	<b>Total Residential Supplies</b>	<b>2.22</b>	<b>126.00</b>	<b>123.78</b>	<b>1.76%</b>
5013700	Specific Use Supplies				
5013730	Computer Operating Supplies	-	10.00	10.00	0.00%
	<b>Total Specific Use Supplies</b>	<b>-</b>	<b>10.00</b>	<b>10.00</b>	<b>0.00%</b>
	<b>Total Supplies And Materials</b>	<b>484.50</b>	<b>2,040.00</b>	<b>1,555.50</b>	<b>23.75%</b>
5015000	Continuous Charges				
5015100	Insurance-Fixed Assets				

Virginia Department of Health Professions  
Revenue and Expenditures Summary  
Department 10800 - Psychology  
For the Period Beginning July 1, 2018 and Ending February 28, 2019

Account Number	Account Description	Amount			% of Budget
		Amount	Budget	Under/(Over) Budget	
5015160	Property Insurance	31.33	32.00	0.67	97.91%
	Total Insurance-Fixed Assets	31.33	32.00	0.67	97.91%
5015300	Operating Lease Payments				
5015340	Equipment Rentals	344.80	540.00	195.20	63.85%
5015350	Building Rentals	10.80	-	(10.80)	0.00%
5015390	Building Rentals - Non State	3,717.47	5,913.00	2,195.53	62.87%
	Total Operating Lease Payments	4,073.07	6,453.00	2,379.93	63.12%
5015500	Insurance-Operations				
5015510	General Liability Insurance	112.46	120.00	7.54	93.72%
5015540	Surety Bonds	6.64	8.00	1.36	83.00%
	Total Insurance-Operations	119.10	128.00	8.90	93.05%
	Total Continuous Charges	4,223.50	6,613.00	2,389.50	63.87%
5022000	Equipment				
5022200	Educational & Cultural Equip				
5022240	Reference Equipment	-	52.00	52.00	0.00%
	Total Educational & Cultural Equip	-	52.00	52.00	0.00%
5022600	Office Equipment				
5022610	Office Appurtenances	-	70.00	70.00	0.00%
	Total Office Equipment	-	70.00	70.00	0.00%
	Total Equipment	-	122.00	122.00	0.00%
	Total Expenditures	83,438.69	121,767.00	38,328.31	68.52%
	Allocated Expenditures				
20100	Behavioral Science Exec	82,850.56	131,250.00	48,399.44	63.12%
30100	Data Center	81,121.99	110,175.66	29,053.67	73.63%
30200	Human Resources	4,559.19	8,925.00	4,365.82	51.08%
30300	Finance	19,111.19	30,977.47	11,866.28	61.69%
30400	Director's Office	8,728.67	12,297.39	3,568.72	70.98%
30500	Enforcement	56,938.59	104,768.46	47,829.87	54.35%
30600	Administrative Proceedings	20,556.62	26,932.40	6,375.79	76.33%
30700	Impaired Practitioners	465.44	1,008.65	543.22	46.14%
30800	Attorney General	2,913.62	5,307.09	2,393.47	54.90%
30900	Board of Health Professions	6,410.67	9,909.71	3,499.04	64.69%
31100	Maintenance and Repairs	9.32	2,527.52	2,518.20	0.37%
31300	Emp. Recognition Program	34.76	198.01	163.25	17.56%
31400	Conference Center	185.19	221.14	35.95	83.74%
31500	Pgm Devlpmnt & Implmentn	5,357.33	7,194.52	1,837.19	74.46%
	Total Allocated Expenditures	289,243.13	451,693.02	162,449.89	64.04%
	Net Revenue in Excess (Shortfall) of Expenditures	\$ (288,920.82)	\$ 46,584.98	\$ 335,505.80	620.20%

**Virginia Department of Health Professions**  
**Revenue and Expenditures Summary**  
**Department 10800 - Psychology**  
**For the Period Beginning July 1, 2018 and Ending February 28, 2019**

<b>Account Number</b>	<b>Account Description</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>October</b>	<b>November</b>	<b>December</b>	<b>January</b>	<b>February</b>	<b>Total</b>
4002400	Fee Revenue									
4002401	Application Fee	2,910.00	6,845.00	6,645.00	8,260.00	5,050.00	3,807.00	5,458.00	7,510.00	46,485.00
4002406	License & Renewal Fee	18,591.00	3,215.00	1,940.00	1,940.00	485.00	695.00	760.00	270.00	27,896.00
4002407	Dup. License Certificate Fee	55.00	10.00	20.00	20.00	-	35.00	10.00	35.00	185.00
4002409	Board Endorsement - Out	400.00	525.00	350.00	325.00	400.00	300.00	225.00	450.00	2,975.00
4002421	Monetary Penalty & Late Fees	4,025.00	925.00	400.00	300.00	150.00	100.00	190.00	10.00	6,100.00
4002432	Misc. Fee (Bad Check Fee)	-	-	-	35.00	-	-	-	-	35.00
	<b>Total Fee Revenue</b>	<b>25,981.00</b>	<b>11,520.00</b>	<b>9,355.00</b>	<b>10,880.00</b>	<b>6,085.00</b>	<b>4,937.00</b>	<b>6,643.00</b>	<b>8,275.00</b>	<b>83,676.00</b>
4003000	Sales of Prop. & Commodities									
4003020	Misc. Sales-Dishonored Payments	-	-	-	85.00	-	-	-	-	85.00
	<b>Total Sales of Prop. &amp; Commodities</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>85.00</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>85.00</b>
	<b>Total Revenue</b>	<b>25,981.00</b>	<b>11,520.00</b>	<b>9,355.00</b>	<b>10,965.00</b>	<b>6,085.00</b>	<b>4,937.00</b>	<b>6,643.00</b>	<b>8,275.00</b>	<b>83,761.00</b>
5011000	Personal Services									
5011100	Employee Benefits									
5011110	Employer Retirement Contrib.	865.04	577.12	577.12	577.12	577.12	577.12	577.12	577.12	4,904.88
5011120	Fed Old-Age Ins- Sal St Emp	480.38	321.02	321.00	321.02	321.00	321.02	323.53	323.54	2,732.51
5011140	Group Insurance	83.88	55.92	55.92	55.92	55.92	55.92	55.92	55.92	475.32
5011150	Medical/Hospitalization Ins.	1,010.50	687.00	687.00	687.00	687.00	687.00	687.00	687.00	5,819.50
5011160	Retiree Medical/Hospitalizatn	75.12	49.94	49.94	49.94	49.94	49.94	49.94	49.94	424.70
5011170	Long term Disability Ins	40.55	26.46	26.46	26.46	26.46	26.46	26.46	26.46	225.77
	<b>Total Employee Benefits</b>	<b>2,555.47</b>	<b>1,717.46</b>	<b>1,717.44</b>	<b>1,717.46</b>	<b>1,717.44</b>	<b>1,717.46</b>	<b>1,719.97</b>	<b>1,719.98</b>	<b>14,582.68</b>
5011200	Salaries									
5011230	Salaries, Classified	6,402.87	4,268.58	4,268.58	4,268.58	4,268.58	4,268.58	4,268.58	4,268.58	36,282.93
	<b>Total Salaries</b>	<b>6,402.87</b>	<b>4,268.58</b>	<b>4,268.58</b>	<b>4,268.58</b>	<b>4,268.58</b>	<b>4,268.58</b>	<b>4,268.58</b>	<b>4,268.58</b>	<b>36,282.93</b>
5011340	Specified Per Diem Payment	500.00	-	-	-	450.00	-	-	150.00	1,100.00
5011380	Deferred Compnstrn Match Pmts	60.00	40.00	40.00	40.00	40.00	40.00	40.00	40.00	340.00
	<b>Total Special Payments</b>	<b>560.00</b>	<b>40.00</b>	<b>40.00</b>	<b>40.00</b>	<b>490.00</b>	<b>40.00</b>	<b>40.00</b>	<b>190.00</b>	<b>1,440.00</b>
	<b>Total Personal Services</b>	<b>9,518.34</b>	<b>6,026.04</b>	<b>6,026.02</b>	<b>6,026.04</b>	<b>6,476.02</b>	<b>6,026.04</b>	<b>6,028.55</b>	<b>6,178.56</b>	<b>52,305.61</b>
5012000	Contractual Svs									-



Virginia Department of Health Professions  
Revenue and Expenditures Summary  
Department 10800 - Psychology  
For the Period Beginning July 1, 2018 and Ending February 28, 2019

Account Number	Account Description	July	August	September	October	November	December	January	February	Total
5012100	Communication Services									-
5012140	Postal Services	940.86	1,265.74	254.21	38.54	71.57	67.89	290.17	49.58	2,978.56
5012150	Printing Services	-	-	73.06	-	-	-	-	-	73.06
5012160	Telecommunications Svcs (VITA)	17.80	35.60	17.80	18.48	25.43	23.89	23.89	23.89	186.78
	Total Communication Services	958.66	1,301.34	345.07	57.02	97.00	91.78	314.06	73.47	3,238.40
5012400	Mgmnt and Informational Svcs									
5012420	Fiscal Services	5,989.14	-	265.31	96.06	-	21.08	9.11	10.35	6,391.05
5012440	Management Services	-	31.09	-	18.15	-	17.20	-	8.24	74.68
5012450	Personnel Develpmnt Services	42.00	-	-	-	-	-	-	-	42.00
5012460	Public Infrmtnl & Relatn Svcs	2.00	16.00	18.00	34.00	24.00	22.00	20.00	20.00	156.00
5012470	Legal Services	-	-	-	-	175.00	-	-	-	175.00
	Total Mgmnt and Informational Svcs	6,033.14	47.09	283.31	148.21	199.00	60.28	29.11	38.59	6,838.73
5012500	Repair and Maintenance Svcs									
5012530	Equipment Repair & Maint Svc	-	-	-	-	567.31	(94.95)	(15.01)	17.86	475.21
	Total Repair and Maintenance Svcs	-	-	-	-	567.31	(94.95)	(15.01)	17.86	475.21
5012600	Support Services									
5012630	Clerical Services	279.85	-	-	-	-	-	-	-	279.85
5012640	Food & Dietary Services	-	55.75	-	-	398.84	-	-	179.40	633.99
5012660	Manual Labor Services	31.57	4.00	14.26	112.06	12.86	-	-	6.21	180.96
5012670	Production Services	194.00	16.80	-	609.40	84.00	-	-	38.60	942.80
5012680	Skilled Services	1,006.95	813.12	813.12	925.62	542.08	542.08	542.08	558.34	5,743.39
	Total Support Services	1,512.37	889.67	827.38	1,647.08	1,037.78	542.08	542.08	782.55	7,780.99
5012800	Transportation Services									
5012820	Travel, Personal Vehicle	988.63	-	-	-	757.55	-	-	765.60	2,511.78
5012830	Travel, Public Carriers	681.60	-	-	2,074.80	91.33	-	-	-	2,847.73
5012850	Travel, Subsistence & Lodging	632.22	-	-	-	907.95	-	-	311.57	1,851.74
5012880	Trvl, Meal Reimb- Not Rprtble	324.25	-	-	-	369.50	-	-	186.75	880.50
	Total Transportation Services	2,626.70	-	-	2,074.80	2,126.33	-	-	1,263.92	8,091.75
	Total Contractual Svcs	11,130.87	2,238.10	1,455.76	3,927.11	4,027.42	599.19	870.24	2,176.39	26,425.08

Virginia Department of Health Professions  
Revenue and Expenditures Summary  
Department 10800 - Psychology  
For the Period Beginning July 1, 2018 and Ending February 28, 2019

Account Number	Account Description	July	August	September	October	November	December	January	February	Total
5013000	Supplies And Materials									
5013100	Administrative Supplies									-
5013120	Office Supplies	34.70	86.14	97.29	48.68	86.00	71.63	18.50	36.83	479.77
	Total Administrative Supplies	34.70	86.14	97.29	48.68	86.00	71.63	18.50	36.83	479.77
5013500	Repair and Maint. Supplies									
5013520	Custodial Repair & Maint Matrl	-	-	-	-	-	-	1.95	-	1.95
5013530	Electrcal Repair & Maint Matrl	-	-	-	-	-	-	-	0.56	0.56
	Total Repair and Maint. Supplies	-	-	-	-	-	-	1.95	0.56	2.51
5013600	Residential Supplies									
5013640	Laundry and Linen Supplies	-	-	-	-	-	-	-	2.22	2.22
	Total Residential Supplies	-	-	-	-	-	-	-	2.22	2.22
	Total Supplies And Materials	34.70	86.14	97.29	48.68	86.00	71.63	20.45	39.61	484.50
5015000	Continuous Charges									
5015100	Insurance-Fixed Assets									-
5015160	Property Insurance	31.33	-	-	-	-	-	-	-	31.33
	Total Insurance-Fixed Assets	31.33	-	-	-	-	-	-	-	31.33
5015300	Operating Lease Payments									
5015340	Equipment Rentals	43.19	42.20	41.88	43.19	41.88	41.88	41.88	48.70	344.80
5015350	Building Rentals	-	3.60	-	-	3.60	-	-	3.60	10.80
5015390	Building Rentals - Non State	477.02	295.79	476.97	476.97	519.19	481.76	476.97	512.80	3,717.47
	Total Operating Lease Payments	520.21	341.59	518.85	520.16	564.67	523.64	518.85	565.10	4,073.07
5015500	Insurance-Operations									
5015510	General Liability Insurance	112.46	-	-	-	-	-	-	-	112.46
5015540	Surety Bonds	6.64	-	-	-	-	-	-	-	6.64
	Total Insurance-Operations	119.10	-	-	-	-	-	-	-	119.10
	Total Continuous Charges	670.64	341.59	518.85	520.16	564.67	523.64	518.85	565.10	4,223.50

Virginia Department of Health Professions  
Revenue and Expenditures Summary  
Department 10800 - Psychology  
For the Period Beginning July 1, 2018 and Ending February 28, 2019

Account Number	Account Description	July	August	September	October	November	December	January	February	Total
Total Expenditures		21,354.55	8,691.87	8,097.92	10,521.99	11,154.11	7,220.50	7,438.09	8,959.66	83,438.69
Allocated Expenditures										
20100	Behavioral Science Exec	14,449.84	9,905.61	9,569.36	9,581.21	9,830.57	9,851.94	9,986.69	9,675.34	82,850.56
20200	Opt/Vet-Med\ASLP Executive Dir	-	-	-	-	-	-	-	-	-
20400	Nursing / Nurse Aid	-	-	-	-	-	-	-	-	-
20600	Funeral\LTCA\PT	-	-	-	-	-	-	-	-	-
30100	Data Center	13,201.63	8,928.03	8,028.46	14,360.18	3,611.83	9,805.41	8,680.11	14,506.34	81,121.99
30200	Human Resources	715.64	81.56	91.44	2,941.61	489.59	72.58	78.15	88.61	4,559.19
30300	Finance	2,984.29	2,348.54	2,235.53	2,052.32	2,338.27	2,163.42	2,726.99	2,261.83	19,111.19
30400	Director's Office	1,594.63	1,040.44	1,053.28	983.31	1,015.64	999.87	1,020.42	1,021.09	8,728.67
30500	Enforcement	7,622.36	4,384.50	4,332.49	5,966.02	7,457.10	9,578.09	8,952.60	8,645.43	56,938.59
30600	Administrative Proceedings	2,995.51	6,348.08	1,444.34	5,636.57	419.28	-	139.30	3,573.54	20,556.62
30700	Impaired Practitioners	91.61	61.65	58.32	58.53	40.78	41.85	70.10	42.60	465.44
30800	Attorney General	-	-	971.21	971.21	-	-	971.21	-	2,913.62
30900	Board of Health Professions	1,004.91	905.85	778.68	828.98	793.46	512.12	777.94	808.73	6,410.67
31000	SRTA	-	-	-	-	-	-	-	-	-
31100	Maintenance and Repairs	-	-	-	-	-	-	-	9.32	9.32
31300	Emp. Recognition Program	1.92	-	-	7.83	2.32	22.69	-	-	34.76
31400	Conference Center	7.61	25.59	12.57	7.69	18.46	5.05	92.19	16.03	185.19
31500	Pgm Devlpmnt & Implmentn	1,156.84	678.23	791.98	566.75	748.08	520.42	443.47	451.56	5,357.33
98700	Cash Transfers	-	-	-	-	-	-	-	-	-
Total Allocated Expenditures		45,826.79	34,708.07	29,367.66	43,962.22	26,765.36	33,573.44	33,939.18	41,100.41	289,243.13
Net Revenue in Excess (Shortfall) of Expenditures		\$ (41,200.34)	\$ (31,879.94)	\$ (28,110.58)	\$ (43,519.21)	\$ (31,834.47)	\$ (35,856.94)	\$ (34,734.27)	\$ (41,785.07)	\$ (288,920.82)

## Discipline Reports

January 4, 2019 to March 21, 2019

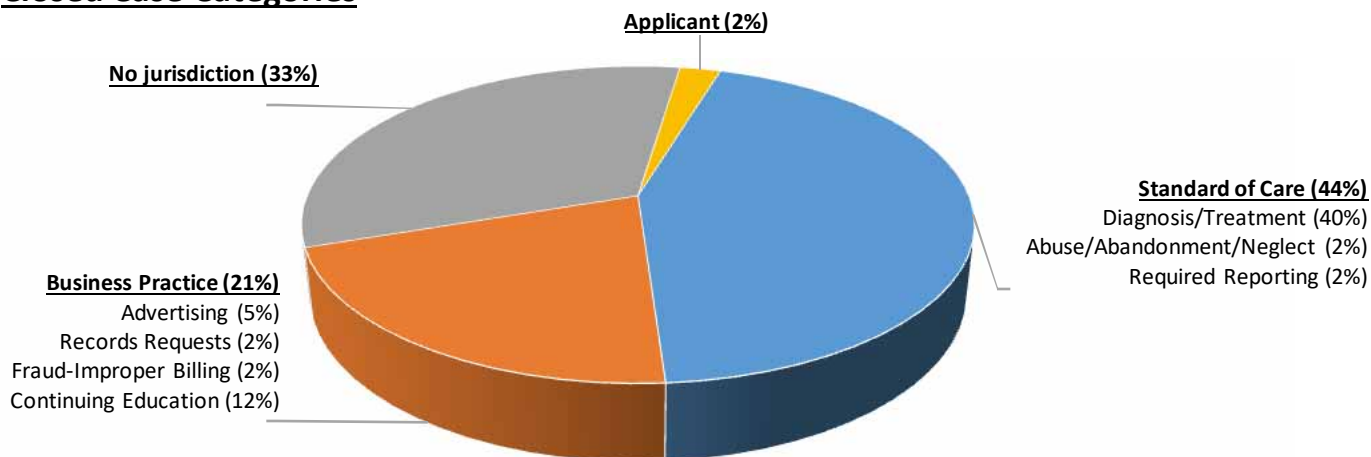
OPEN CASES AT BOARD LEVEL (as of March 21, 2019)				
Open Case Stage	Counseling	Psychology	Social Work	BSU Total
Probable Cause Review	87	31	53	<i>171</i>
Scheduled for Informal Conferences	5	1	0	<i>6</i>
Scheduled for Formal Hearings	1	1	0	<i>2</i>
Consent Orders (offered and pending)	7	2	2	<i>11</i>
Cases with APD for processing (IFC, FH, Consent Order)	16	2	5	<i>23</i>
<b>TOTAL OPEN CASES</b>	<b>116</b>	<b>37</b>	<b>60</b>	<b><i>213</i></b>

NEW CASES RECEIVED AND ACTIVE INVESTIGATIONS				
	Counseling	Psychology	Social Work	BSU Total
Cases <b>Received</b> for Board review	67	35	27	<i>129</i>
Open <b>Investigations</b> in Enforcement	80	39	35	<i>154</i>

UPCOMING CONFERENCES AND HEARINGS	
Informal Conferences	TBD
Tentative Formal Hearing Dates	Following board meetings, as needed

CASES CLOSED (January 4, 2019 to March 21, 2019)	
Closed – no violation	34
Closed – undetermined	4
Closed – violation	4
Credentials/Reinstatement – Denied	0
Credentials/Reinstatement – Approved	1
<b>TOTAL CASES CLOSED</b>	<b>43</b>

### Closed Case Categories



AVERAGE CASE PROCESSING TIMES (counted on closed cases)	
Average time for case closures	190
Avg. time in Enforcement (investigations)	71
Avg. time in APD (IFC/FH preparation)	99
Avg. time in Board (includes hearings, reviews, etc).	115
Avg. time with board member (probable cause review)	3

# Number of Licensees

Profession	1/15/2019	3/26/2019
Applied Psychologist	29	29
Clinical Psychologist	3610	3668
Resident in School Psychology		7
Resident in Training	871	872
School Psychologist	99	99
School Psychologist-Limited	572	591
Sex Offender Treatment Provider	425	432
SOTP Trainee		148
Total	5606	5846

### **Board Bylaws**

After discussion, a motion was made to approve the boards Bylaws as provided. On properly seconded motion, the Bylaws were approved unchanged.

### **Healthcare Workforce Data Center (DHP HWDC)**

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**Presenter** Dr. Shobo

#### **Discussion**

Dr. Shobo provided a PowerPoint presentation. Attachment 1

- ❖ **Lunch break – 11:50 a.m.**
- ❖ **Meeting resumed at 12:01 p.m.**

### **Board Reports**

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**Presenter** Dr. Clayton-Jeter

- **Board of Psychology**  
Dr. Stewart provided an overview of the Board since the last meeting. Attachment 2
- **Board of Counseling**  
Dr. Doyle provided an overview of the Board since the last meeting. Attachment 3
- **Board of Veterinary Medicine**  
Dr. Johnson provided an overview of the Board since the last meeting. Attachment 4
- **Board of Social Work**  
Mr. Salay provided an overview of the Board since the last meeting. Attachment 5
- **Board of Pharmacy**
  - Mr. Logan provided an overview of the Board since the last meeting. He stated that the Board completed its review of guidance documents that have not been reviewed or re-adopted in the past 4 years.
  - The Board selected five of the 71 pharmaceutical processor applications received. These processors must be operational by December 2019.
  - The Board worked in collaboration with the Board of Medicine on the NP and PA legislation.
  - An agent must be assigned to receive oils.
- **Board of Nursing**
  - Ms. Minton stated that the Board is very excited about the new website. It will improve office staff efficiency and be more user friendly for the public.
  - HB 793 allows nurse practitioners to practice autonomously with 4,000 NP in Virginia.
  - The Board is working on updating guidance documents.
  - Ms. Saxby is retiring April 1, 2019. A search for her replacement is underway.



**DRAFT**

**In Attendance**

- Lisette P. Carbajal, MPA, Citizen Member
- Helene D. Clayton-Jeter, OD, Board of Optometry
- Kevin Doyle, EdD, LPC, LSATP, Board of Counseling
- Mark Johnson, DVM, Board of Veterinary Medicine
- Allen R. Jones, Jr., DPT, PT, Board of Physical Therapy
- Louis R. Jones, FSL, Board of Funeral Directors and Embalmers
- Derrick Kendall, NHA, Board of Long-Term Care Administrators
- Allison R. King, PhD, CCC-SLP, Board of Audiology & Speech-Language Pathology
- Ryan Logan, RPh, Board of Pharmacy
- Trula E. Minton, MS, RN, Board of Nursing
- Kevin O'Connor, MD, Board of Medicine
- Maribel Ramos, Citizen Member
- John M. Salay, MSW, LCSW, Board of Social Work
- Herb Stewart, PhD, Board of Psychology
- James D. Watkins, DDS, Board of Dentistry
- James Wells, RPh, Citizen Member

**Absent**

Martha S. Rackets, PhD, Citizen Member

**DHP Staff**

- Barbara Allison-Bryan, MD
- David Brown, DC, Director DHP
- Elizabeth A. Carter, Ph.D., Executive Director BHP
- Laura L. Jackson, MSHSA, Operations Manager BHP
- Charise Mitchel, OAG
- Yetty Shobo, PhD, Deputy Executive Director BHP
- Elaine Yeatts, Senior Policy Analyst DHP

**Speakers**

No speakers signed-in

**Observers**

- Jerry Gentile, DPB
- W. Scott Johnson, Hancock Daniel
- Jalme Hoyle, JD, Executive Director for the Behavioral Sciences Boards
- Corie Tillman-Wolf, JD, Executive Director Boards of Funeral Directors and Embalmers, Long Term Care and Physical Therapy



### **Call to Order**

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**Chair:** Dr. Clayton-Jeter      **Time** 10:01 a.m.  
**Quorum**      Established

### **Approval of Minutes**

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**Presenter**      Dr. Clayton-Jeter

#### **Discussion**

The meeting minutes from the August 23, 2018 and December 4, 2018 Full Board were approved. All members in favor, none opposed.

### **Directors Report**

---

**Presenter**      Dr. Brown

#### **Discussion**

- Dr. Brown reported that a bill to reinstate staggering board member terms passed. This helps to prevent loss of experience is not lost at one time. This bill allows for a one-time fix.
- Music therapists passed over the sunrise review process and went straight to the General Assembly initiating a bill for the Board of Medicine to provide title protection and registration. He stated that the Board of Health Professions would be receiving a letter requesting a study to be completed by November 2019.
- Four telemedicine bills are in the process of review. DHP is to convene a workgroup to discuss the issues driving these requests.
- Delegate Tran requested that DHP review the need for Virginia to utilize foreign-trained providers. A workforce advisory panel will be convened to review this.
- Cannabidiol oil is under review for further regulation.
- The Board of Nursing website has been redesigned. It will be user friendly both internally and externally. It is no longer HTML based, allowing board staff to make their own changes.

### **Welcome of New Board Members**

---

**Presenter**      Dr. Clayton-Jeter

#### **Discussion**

Dr. Clayton Jeter welcomed three new board members:

- Louis R. Jones, Board of Funeral Directors & Embalmers
- Alison R. King, PhD, CCC-SLP, Board of Audiology & Speech Language Pathology
- John M. Salay, MSW, Board of Social Work

All board members provided a brief introduction of themselves.

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### **Legislative and Regulatory Report**

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**Presenter** Ms. Yeatts

#### **Discussion**

Ms. Yeatts advised the Board of updates to the laws and regulations that affect DHP currently in the General Assembly.

#### **Public Comment**

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#### **Discussion**

There was no public comment

### **Board Chair Report**

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**Presenter** Dr. Clayton-Jeter

#### **Discussion**

Dr. Clayton-Jeter read the agencies Mission statement and stressed that it is each board members job to serve and protect the public.

### **Executive Directors Report**

---

**Presenter** Dr. Carter

#### **Board Budget**

Dr. Carter stated that the Board is operating under budget.

#### **Agency Performance**

Dr. Carter stated that it is becoming very difficult for some boards to close cases in the 250 days allotted as they are inundated with an increasing number of cases. This process is currently under review.

#### **New Staff Member**

Dr. Carter introduced Rajana Silva as the Board's new Data Analyst.

#### **Board Policies & Procedures**

After discussion, a motion was made to approve the Policies & Procedures as provided. Motion was approved and properly seconded. All members in favor, none opposed.

#### **Board Mission Statement**

After discussion, a motion was made to move discussion of the boards' mission statement to the May 14, 2019 meeting. All members in favor, none opposed.



**DRAFT**

- **Board of Medicine**
  - The Board passed approved and passed NP autonomous practice.
  - The Board provided CME for licensees who attended training on prescribing and tapering of opioids.
  - The Board is currently collaborating with the Board of Pharmacy on compounding.
  - Dr. O'Connor stated that complaints are up due to the new "File A Complaint" button on the website
- **Board of Funeral Directors and Embalmers**  
 Mr. Jones provided an overview of the Board since the last meeting. Attachment 6
- **Board of Optometry**  
 Dr. Clayton-Jeter provided an overview of the Board since the last meeting. Attachment 7
- **Board of Physical Therapy**  
 Dr. Jones, Jr. provided an overview of the Board since the last meeting. Attachment 8
- **Board of Audiology & Speech-Language Pathology**  
 Dr. King provided an overview of the Board since the last meeting. Attachment 9
- **Board of Dentistry**  
 Dr. Watkins provided an overview of the Board since the last meeting. Attachment 10
- **Board of Long Term Care Administrators**  
 Dr. Carter provided an overview on behalf of Mr. Kendall. Attachment 11

**Election of Officers - Nominating Committee**

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**Presenter** Dr. Johnson

**Discussion**

The Nominating Committee met prior to the December 4, 2018 Full Board meeting to organize a slate of officers. Dr. Johnson stated that Dr. Allen Jones, Jr., submitted interest in the Chair position and James Wells, RPh, submitted interest in the Vice Chair position. Nominations were open to the floor. With no additional nominations the Board elected by verbal vote Dr. Allen Jones, Jr. as Chair and James Wells as Vice Chair. All members were in favor, none opposed.

**New Business**

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**Presenter** Dr. Clayton-Jeter

Dr. Clayton-Jeter asked Ms. Jackson to review the status of the Boards committees. After discussion, Dr. Clayton-Jeter asked interested board members to email Ms. Jackson if they are interested in filling a vacant seat on a committee. Ms. Jackson will notify new board Chair, Dr. Jones, Jr., of individuals interested in serving.

**DRAFT**

**May 14, 2019 Full Board Meeting**

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**Presenter** Dr. Clayton-Jeter

Dr. Clayton-Jeter announced the next Full Board meeting date as May 14, 2019.

**Adjourned**

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**Adjourned** 1:02 p.m.

**Chair** Allen Jones, Jr.

Signature: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

**Board Executive Director** Elizabeth A. Carter, Ph.D.

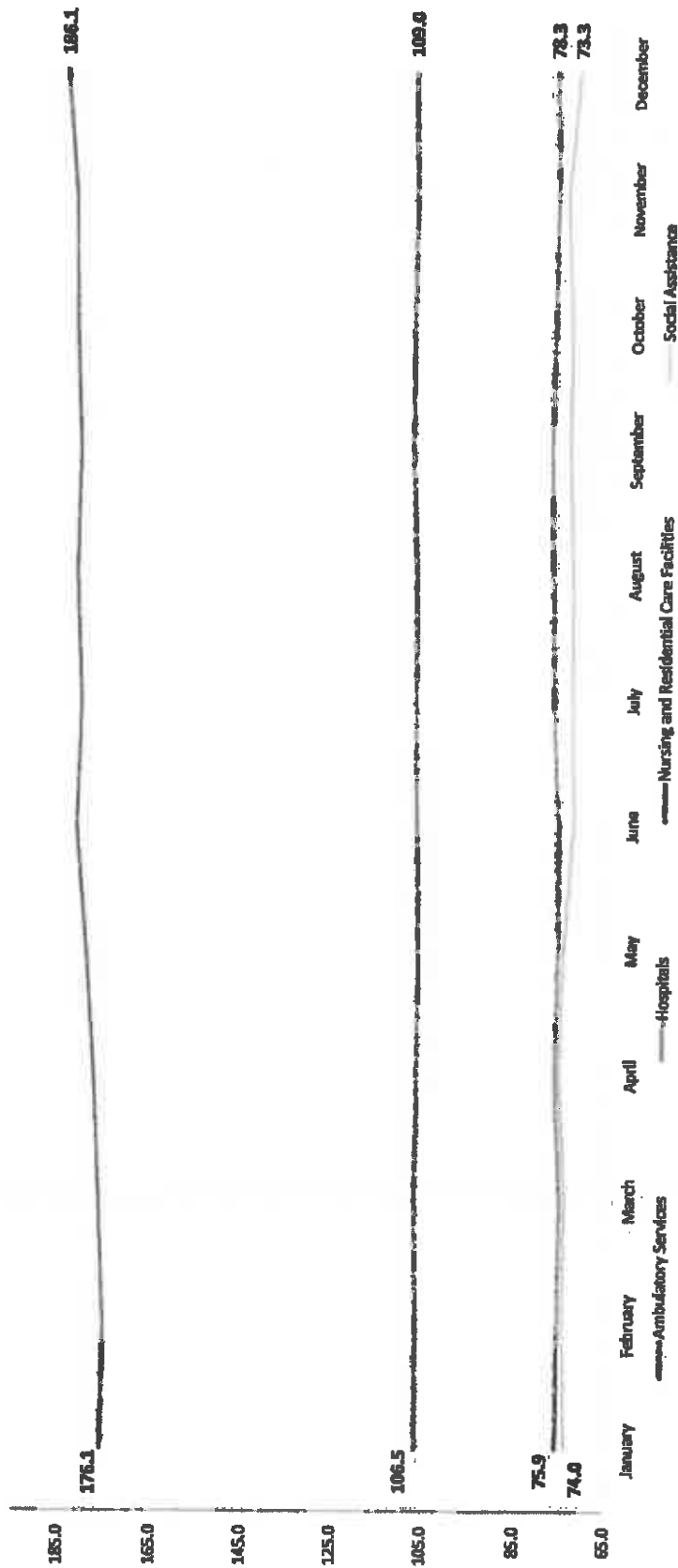
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# Virginia Healthcare and Social Assistance Employment

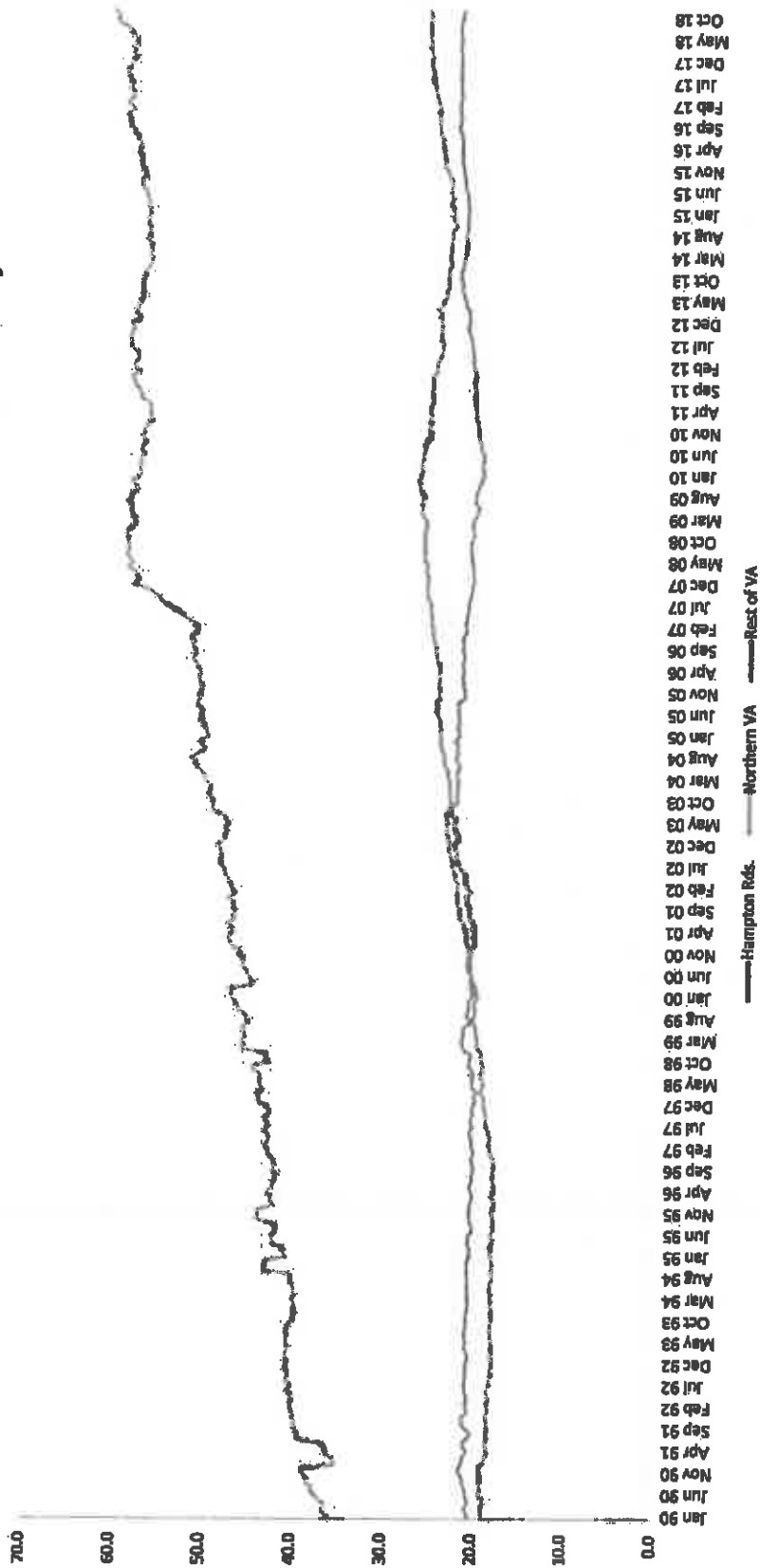
Yetty Shobo, PhD  
Board of Health Professions Meeting  
February 25, 2019

## Trends in Health Care and Social Assistance Employment by Sector in 2018





## Trends in Hospital Employment (in Thousands)



See more at <http://vahwdc.tumblr.com/HCSAEmployment>



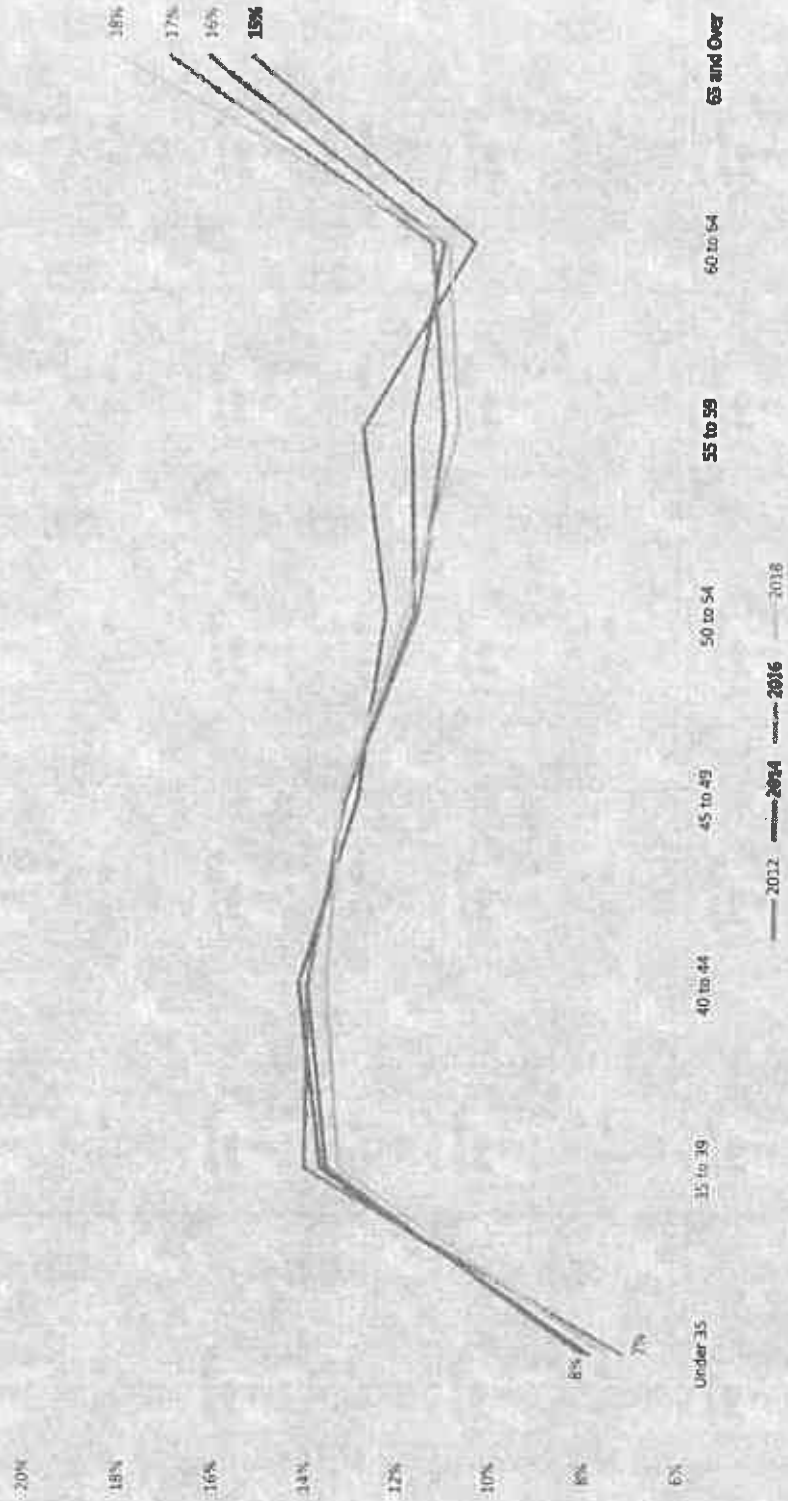
# Virginia Physician Workforce: 2012-2018 Trends

Yetty Shobo, PhD  
Board of Health Professions Meeting  
February 25, 2019

## Goal

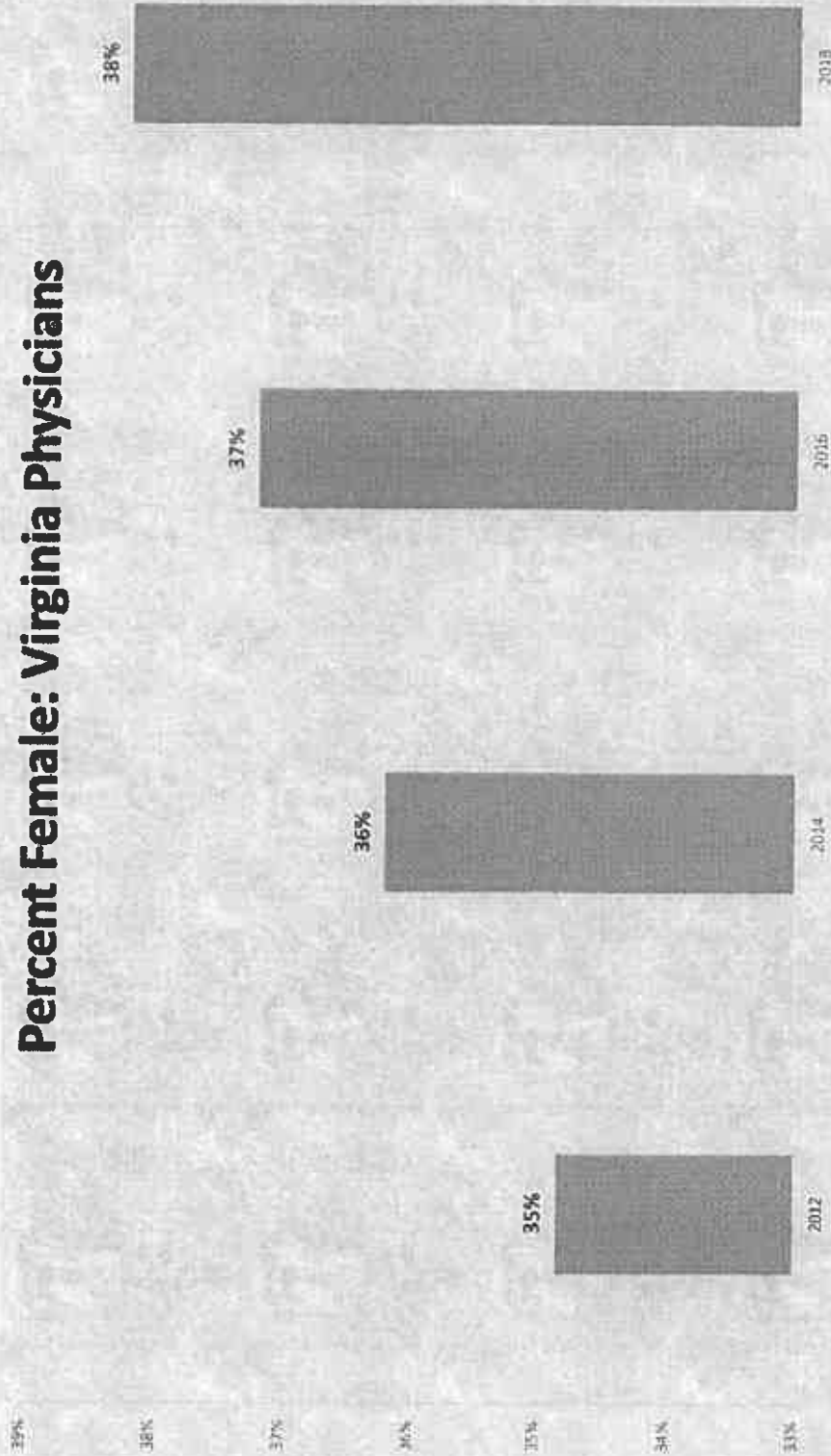
- Research has found that females and racial/ethnic minorities constitute an increasing proportion of the physician population
- Is this the case in Virginia?
  - Examine trends in physicians' age, gender, and racial diversity
- Also, examine trends in board specialty and trends by gender

## Age Distribution



**Median age is 51; was only 50 in 2014**

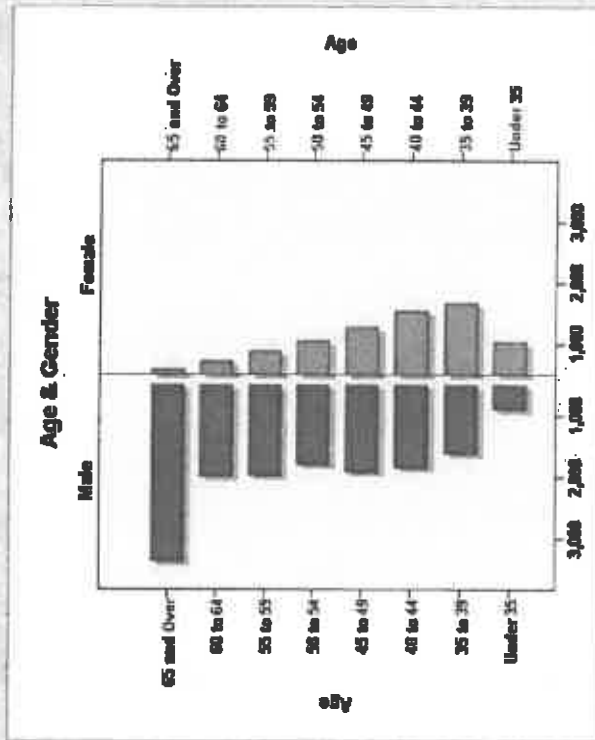
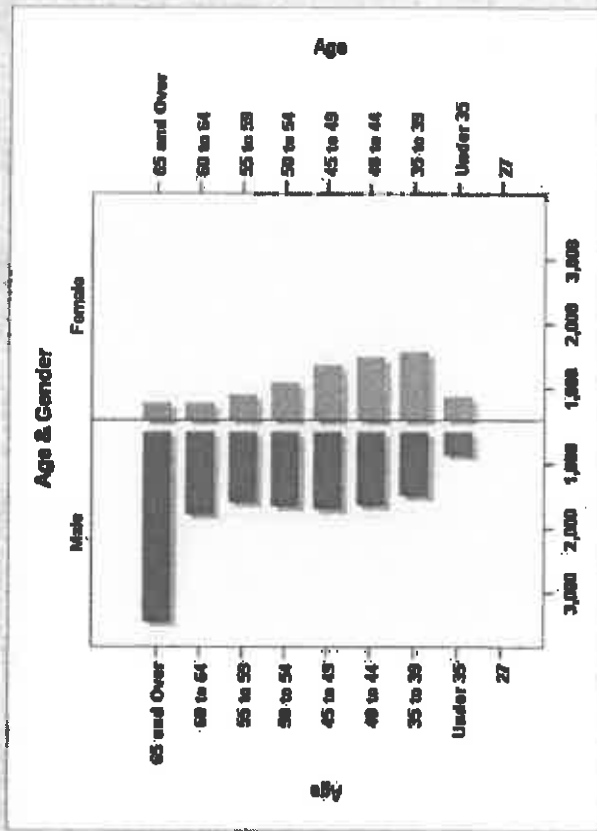
## Percent Female: Virginia Physicians



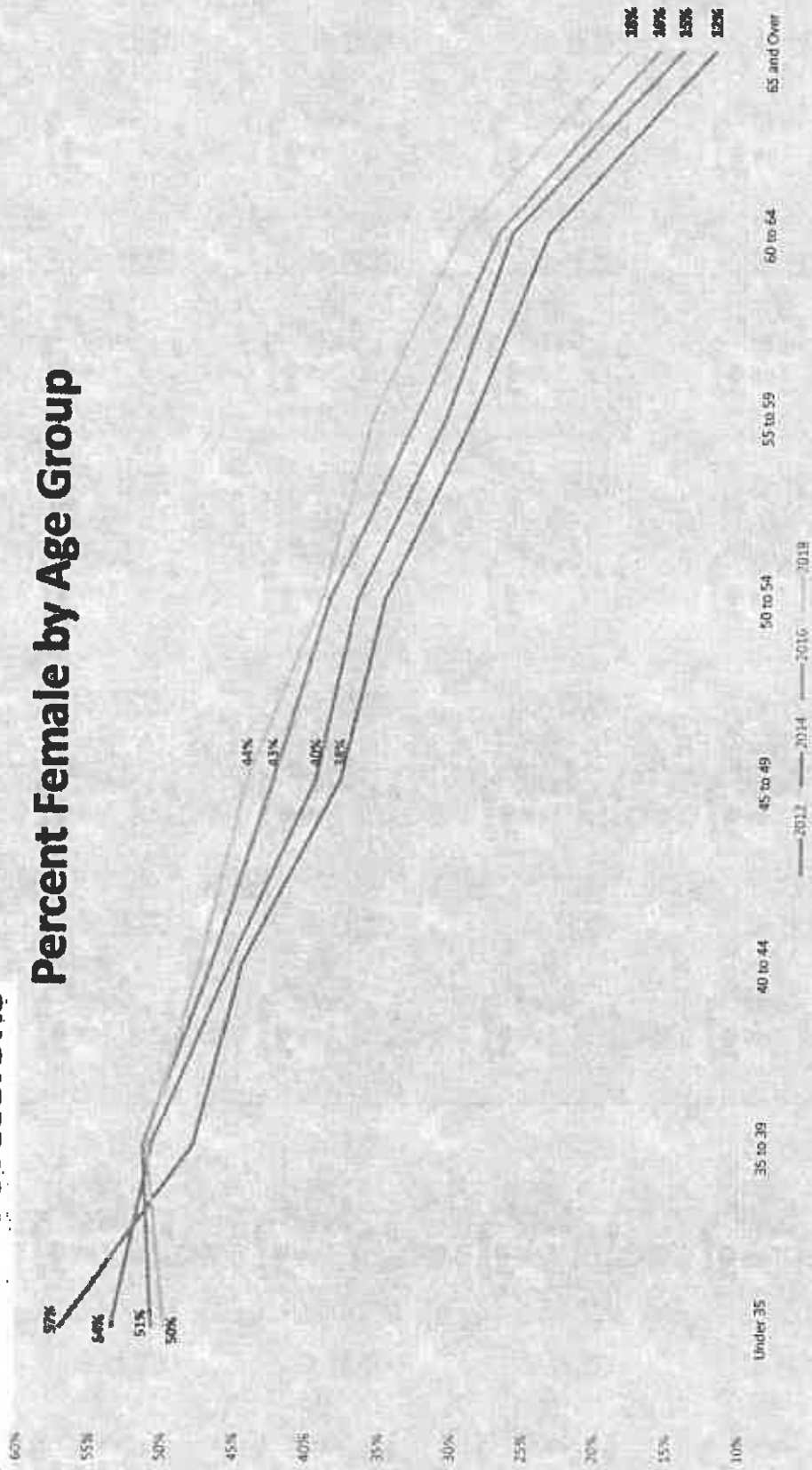
# Gender Diversity

2018

2012



## Percent Female by Age Group

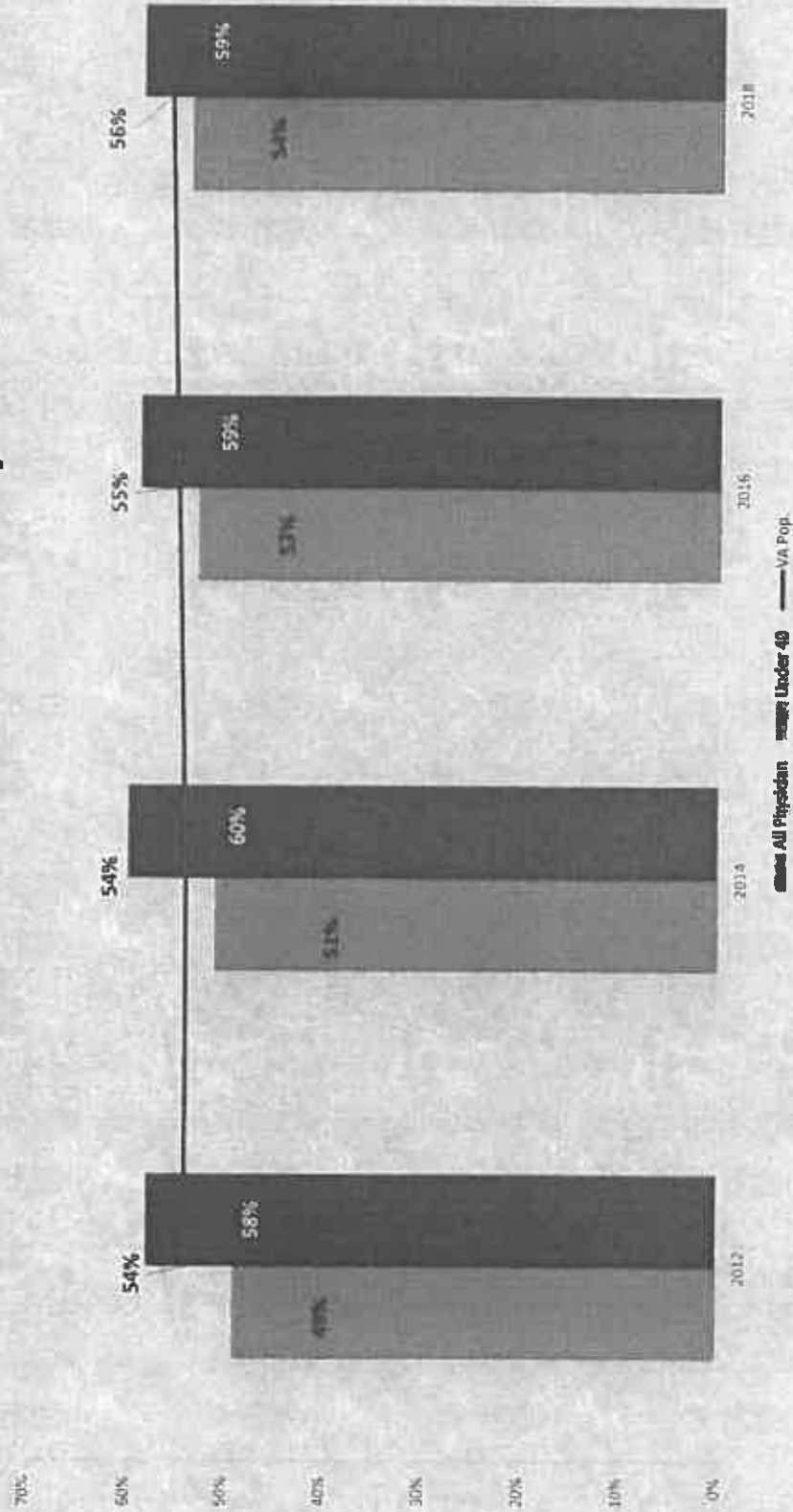


## 2018 Racial/Ethnic Diversity

	VA Pop.	All Physician	Under 40
White, non-Hispanic	62%	65%	60%
Black, non-Hispanic	19%	8%	7%
Asian	6%	18%	22%
Other Race	0%	4%	4%
Two or More Races	3%	2%	3%
Hispanic of any race	9%	4%	4%
Overall diversity	56%	54%	59%

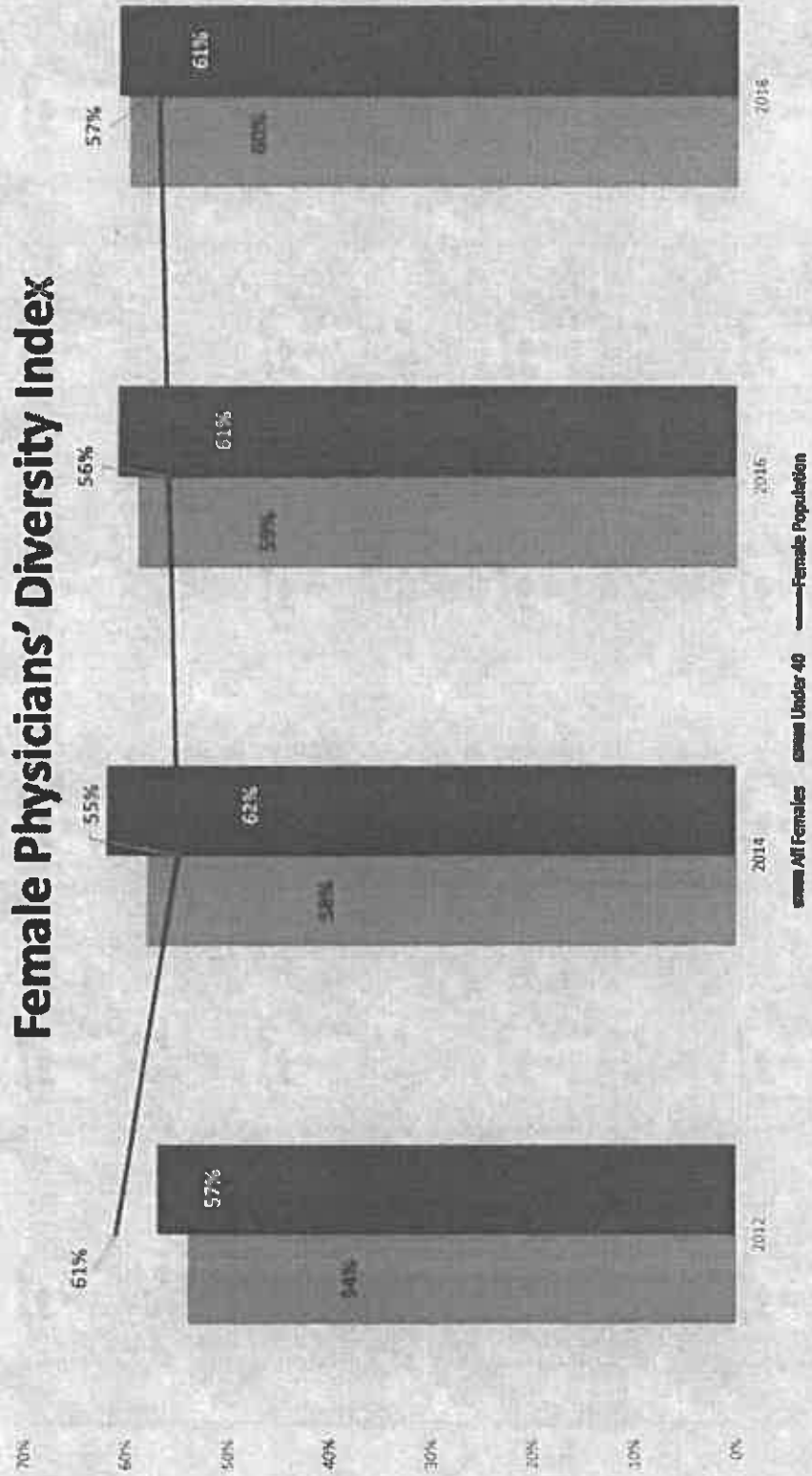


## Virginia Physicians' Diversity Index

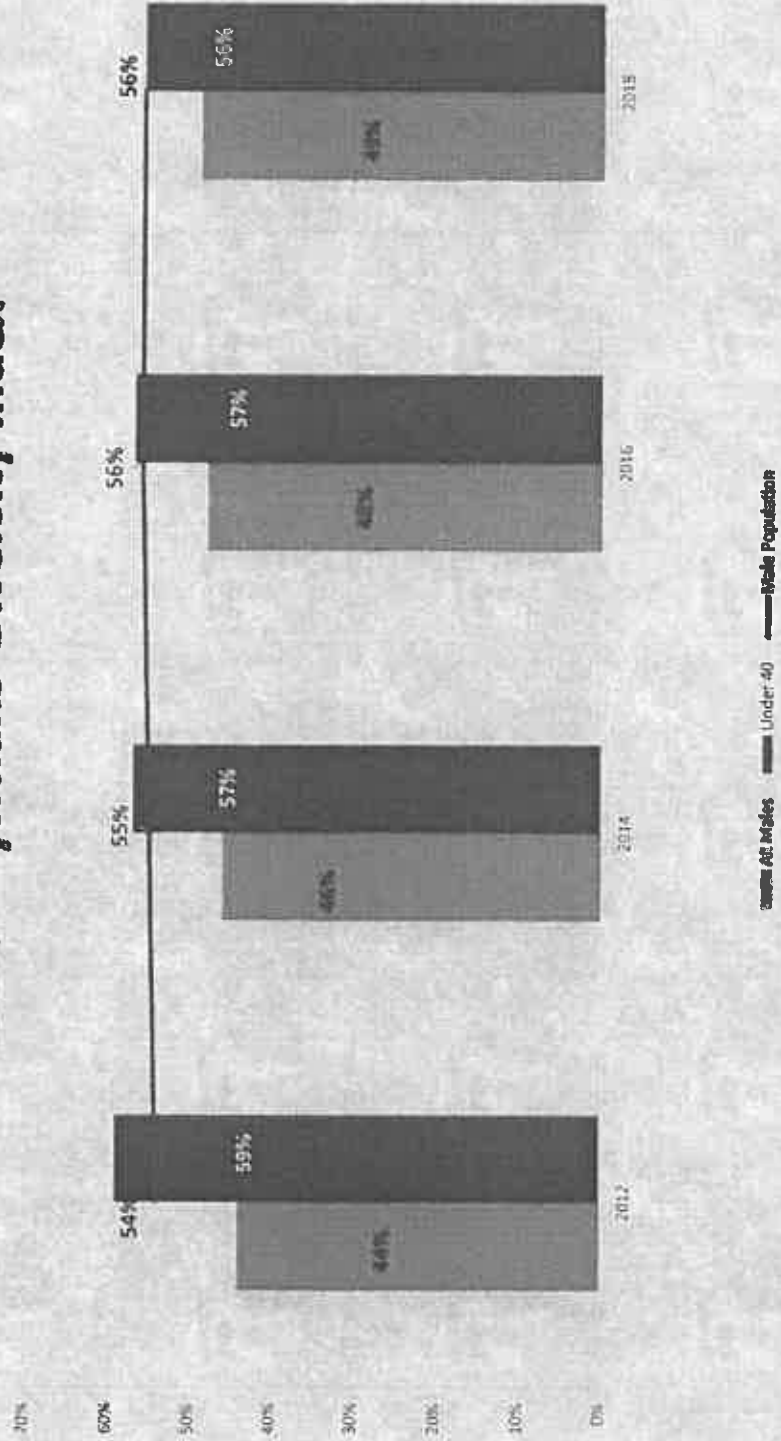




## Female Physicians' Diversity Index



## Male Physicians' Diversity Index



# Physician Board Certifications

2018	2016	2014	2012
Internal Medicine	Internal Medicine	Internal Medicine	Internal Medicine
Family Medicine	Family Medicine	Family Medicine	Family Medicine
Pediatrics	Pediatrics	Pediatrics	Pediatrics
Surgery	Surgery	Surgery	Psychiatry and Neurology
Psychiatry/Neurology	Radiology	Psychiatry/Neurology	Radiology
Emergency Medicine	Psychiatry/Neurology	Emergency Medicine	Anesthesiology
Obstetrics/Gynecology	Emergency Medicine	Obstetrics/Gynecology	Emergency Medicine
Anesthesiology	Anesthesiology	Anesthesiology	All others
Radiology	Obstetrics/Gynecology	Radiology	
Ophthalmology	Pathology	Ophthalmology	

# 2018 Physician Board Certifications by Gender

	Males		Females	
	2018	2016	2018	2016
Internal Medicine		Internal Medicine	Internal Medicine	Internal Medicine
Family Medicine		Surgery	Pediatrics	Pediatrics
Surgery		Family Medicine	Family Medicine	Family Medicine
Psychiatry and Neurology		Radiology	Psychiatry and Neurology	Psychiatry and Neurology
Pediatrics		Psychiatry and Neurology	Obstetrics/Gynecology	Obstetrics/Gynecology
Emergency Medicine		Pediatrics	Emergency Medicine	Radiology
Radiology		Anesthesiology	Anesthesiology	Emergency Medicine
Anesthesiology		Emergency Medicine	Surgery	Surgery
Obstetrics/Gynecology		Obstetrics/Gynecology	Radiology	Pathology
Ophthalmology		Ophthalmology	Dermatology	Anesthesiology

## Conclusion

- Changes in the age, gender, racial, and specialty composition of Virginia physicians are important
- Significant implications for future healthcare workforce

**Virginia Board of Psychology  
Board of Health Professions  
General Business Meeting  
February 25, 2019**

**Attachment 2**

	Licenses/Cert/Reg
Applied	29
Resident	873
School	99
School – Limited	580
Sex Offender Treatment Provider	427
LCP	3640
<b>Total</b>	<b>5648</b>

We have held 1 Formal Hearing in 2018.

**Regulatory Changes**

Section	Change	Stage
18VAC125-20	The Board intends to specify in section 150 that the standard of practice requiring licensed psychologists to “avoid harming patients or clients, research participants, students and others for whom they provide professional services and minimize harm when it is foreseeable and unavoidable” includes the provision of conversion therapy and to define what conversion therapy is and is not. The goal is to align regulations of the Board with the stated policy and ethics for the profession.	NOIRA stage: Under review with the Secretary of Health and Human Resources.
18VAC125-20	Periodic Review: The Board intends to update its regulations for consistency and clarity, reduce the regulatory hurdle for licensure by endorsement, increase the opportunities for continuing education credits, specify a time frame within which an applicant must have passed the national examination, and simplify the requirement for individual supervision in a residency. The Board will also consider requiring all psychology doctoral programs to be accredited by the American Psychological Association, the Canadian Psychologic Association or another accrediting body acceptable to the Board within three years of the effective date of the regulation. Finally, the Board intends to revamp its regulations on standards of conduct to emphasize rules for professionalism, confidentiality, client records, and prohibitions on dual relationships.	Proposed stage: Under review at the Governor’s Office.

**Legislation of Interest – 2019 General Assembly Session**

**HB2228:** The bill replaces the requirement that a member of the Board of Psychology be licensed as an applied psychologist with the requirement that that position be filled by a member who is licensed in any category of psychology.

**News Updates**

The Board published a Guidance Document on Conversion Therapy. It is currently out on Townhall for public comment.

The Board adopted a Telemental Health Guidance Document.

The Board is still looking to pursue PSYPACT and align with the enhance EPPP.

**Next Meeting:**

April 2, 2019

**Virginia Board of Counseling  
Board of Health Professions  
General Business Meeting  
February 25, 2019**

**Attachment 3**

**Regulatory Changes**

Section	Change	Stage
18VAC115-15, 18VAC115-20, 18VAC115-40, 18VAC115-50, 18VAC115-60	Periodic review of the Board of Counseling Regulations	Pending
18VAC115-50	The amendment will recognize hours acquired in an internship or practicum in doctoral programs accredited by COAMFTE or CACREP as meeting a portion of the hours of supervised residency for licensure.	Fast-Track – Under review with the Attorney General.
18VAC115-20, 18VAC115-30, 18VAC115-50, 18VAC115-60	Specify in Regulations that the standard of practice requiring persons licensed, certified or registered by the board to "Practice in a manner that is in the best interest of the public and does not endanger the public health, safety, or welfare" precludes the provision of conversion therapy and to define what conversion therapy is and is not.	NOIRA under review with the Department of Planning and Budget.
18VAC115-20	Provide a pathway for foreign trained graduates in counseling to obtain licensure as a professional counselor in Virginia. The Board intends to adopt language similar to psychology, which provides that graduates of programs that are not within the US of Canada can qualify for licensure if they can provide documentation from an acceptable credential evaluation service that allows the board to determine if the program meets the requirements set forth in the regulation.	Proposed under review with Secretary of Health and Human Resources.
18VAC115-20	Acceptance of supervised practicum and internship hours in a doctoral program accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP). The intent is to recognize hours acquired in an accredited doctoral programs as meeting a portion of the hours of residency required for licensure.	Final Regulations. Under review with Secretary of Health and Human Resources
18VAC115-20	Requirement for CACREP accreditation for educational programs	Proposed under review with the Attorney General
18VAC115-30	Updating and clarifying CSAC and CSAC-A regulations: The Board intends to amend regulations for certified substance abuse counselors (CSAC) and counseling assistants to clarify portions that have confused applicants, add more specific requirements for supervised practice to better ensure accountability and quality in the experience, add time limits for completion of experience to avoid perpetual supervisees who may continue to practice without passage of an examination and completion of certification, add requirements for continuing education as a requisite for renewal to ensure on-going competency to practice, and place additional standards of practice in regulation to address issues the Board has seen in complaints and disciplinary proceedings and for consistency with other professions in behavioral health.	Final Stage under review with the Department of Planning and Budget.
18VAC-115-70	Regulations for registration of peer recovery specialists promulgated pursuant to a mandate of Chapters 418 and 426 of the 2017 Acts of the Assembly	Proposed stage. Comment period under way until 4/5/2019.
18VAC-115-80	Regulations for registration of qualified mental health professionals promulgated pursuant to a mandate of Chapters 418 and 426 of the 2017 Acts of the Assembly.	Proposed stage. Comment period under way until 4/5/2019.

	Total Licenses/certifications/registrations
CSAC	1,898
CSAC-A	248
Substance Abuse Trainee	1814
LMFT	898
LPC	5662
ROS (initial and add/change)	8347



QMHP-A	7200
QMHP-C	6472
Peer	204
MFT ROS (initial and add/change)	308
LSATP	243
Substance Abuse Res.	5
QMHP Trainee	1383
Rehab Counselor	219
<b>Total</b>	<b>34901</b>

**News Updates**

The Board completed the grandfather period for QMHPs on December 31, 2018.

The Board proposed a Guidance Document on Conversion Therapy. It will be available on Townhall for public comment.

The Board has an Ad-Hoc Committee on Telemental Health that will meet in May. The goal is to update our guidance document related to telemental health.

The Board is also looking to support the ACA in its efforts to obtain a grant to pursue a interstate compact.

During the General Assembly, two pieces of legislation passed that will impact the Board. HB2693/HB1694 which require the Board to promulgate regulations for the registration of persons receiving supervised training in order to qualify as a QMHP.

HB2282 which directs the Board to promulgate emergency regulations for the issuance of temporary licenses to individuals engaged in a counseling residency so that they may acquire the supervised, postgraduate experience required for licensure.

**NEXT MEETING: May 31.**

**Virginia Board of Veterinary Medicine  
Board of Health Professions Meeting  
February 25, 2019**

**Attachment 4**

**Statistics**

Next scheduled meeting is March 7, 2019.

**Complaints (62 additional cases equates to a 31.5% increase; complexity of cases have also increased)**

FY2016 Received 197	-	FY2017 Received 259	-	FY2018 Received 217	-	Y-T-D FY2019 Received 142
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**Licenses (in state/out of state based on address of record provided by licensee)  
Renewal currently underway.**

Type of Licensee	Total # of Licensees	In-State Address Active/Inactive	Out-of-State Address Active/Inactive
Veterinarian	4,223	3,155/47	808/213
Veterinary Technician	2,233	1,934/39	229/31
EquineDental Technician	24	15/0	9/0
Veterinary Establishment Stationary & Ambulatory	1,135		

**Continuing Education**

Continuing education (CE) audit is complete.

**Inspection Update**

Starting in January, the routine inspection process will focus on the most frequent types of violations, which are related to drug stocks and surgical suites. Focused inspections will be a better utilization of resources and improve efficiency of the inspection process. A focused inspection will not preclude an inspection from citing a violation related to other areas. Initial inspections will be completed using technology when appropriate.

**Legislation of Interest**

The Board continues to oversee the new PMP reporting requirements for veterinarians. During 2019 session, legislation was introduced (SB1653) that exempted two veterinary drugs from PMP reporting requirements which is awaiting Governor's signature. Additionally, HB2557 adds gabapentin to Schedule V. Gabapentin the top drug dispensed for veterinarians. This legislation is awaiting Governor's signature.

**Virginia Board of Social Work  
Board of Health Professions  
General Business Meeting  
February 25, 2019**

**Attachment 5**

	Licenses/regs issued
Associate	2
Registered	10
LCSW	7046
LSW	803
ROS (initial and add/change)	2138
<b>Total</b>	<b>10,005</b>

We held 1 Formal Hearing in 2018.

**Regulatory Changes**

Section	Change	Stage
18VAC140-20	Reduction in CE requirement for supervisors	Department of Planning and Budget reviewing for authorization of use of Fast Track.
18VAC140-20-10 et seq	Pursuant to Chapter 451 of the 2018 Acts of the Assembly (HB614), the Board of Social Work has adopted amendments to 18VAC140-20-10 et seq., relating to the division of the category of "licensed social worker" into two licensure categories of "baccalaureate social worker" and "master's social worker."	Fast Track: Under review with the Governor's Office
18VAC140-20	The Board intends to amend the requirements for continuing education in section 105 to increase the hours pertaining to ethics or the standards of practice for behavioral health professions from a minimum of two to six hours every two years.	Proposed stage: Comment period is underway until 3/8/2019.

**News Update:**

The Board recently updated its guidance document on TeleSocial Work and Social Media.

The Board wants to focus on workforce issues and ensuring that any regulatory and policy changes protect the public but also ensure that the workforce needs are met.

The Board will address conversion therapy at its next meeting.

**Next Board Meeting:**

March 15, 2019

**Board of Funeral Directors and Embalmers**

**Last Meeting: January 24, 2019**

**Updates:**

- The Board is currently undergoing a periodic review of three sets of regulations, including regulations for the practice of funeral services, as well as for preneed funeral contracts and for funeral service licensees. The Board has adopted NOIRAs to start the process of making amendments and clarifications that were identified during the process.
- In November 2018, final regulations became effective to allow licensees who attend Board meetings and hearings to earn up to one credit hour of continuing education in laws and regulations for every other renewal cycle.

**Virginia Board of Optometry  
Board of Health Professions Meeting  
February 25, 2019**

**Attachment 7**

**Statistics**

Last board meeting held on February 8, 2019

**January 1 – December 4, 2018**

Board - 3	Committee -	Disciplinary
	0	- 5

**Complaints (no further update)**

FY2016	FY2017	FY2018	Y-T-D
Received -	Received -	Received -	FY2019
13	36	42	Received - 7

**Licenses (in state/out of state based on address of record provided by licensee):**

Licensure renewal is completed. There was a fee reduction with this renewal and a change in expiration date. The expiration date is moved to March 31. This year's renewal resulted in a license that is valid for 15 months.

**Y-T-D as of 02/20/19**

Total - 1,875	TPA	-	DPA	-	Professional Designations -
	1,153/376		18/78		250

**Continuing Education**

CE audit completed.

**Regulatory Changes**

The following regulatory actions are underway:

- Periodic review - The Board is adopted final regulations at its last board meeting.
- Prescribing of opioids – The final regulations are in-process. The emergency regulations needed an extension because the promulgation process will not be completed prior to the current expiration date of the emergency regulations.
- Inactive licenses – At the Secretary's office for approval.

**Board of Physical Therapy**

**Last Meeting: February 19, 2019**

**Updates:**

- **Legislation to enact the Physical Therapy Licensure Compact has passed both houses in the General Assembly and is awaiting the Governor's signature. This legislation (SB 1106) was pursued by the Board of Physical Therapy and was included in the Governor's legislative package at DHP's request. The Compact will become effective January 1, 2020.**
- **The Board is currently undergoing a periodic review of its regulations. The Board adopted a NOIRA at its last meeting to start the process of making amendments and clarifications identified during the process.**
- **Final regulations became effective on February 10, 2019, to allow licensees who attend Board meetings and hearings to earn up to two hours of Type 2 continuing education credit for each biennial renewal cycle.**

**Virginia Board of Audiology and Speech-Language Pathology  
Board of Health Professions Meeting  
February 25, 2019**

**Attachment 9**

**Statistics**

Full board meeting held on February 19, 2019.

January 1 – December 4, 2018

Board - 3	Committee - 0	Disciplinary - 5
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**Complaints (mostly related to non-compliance with CE requirements)**

FY2016 Received - 13	FY2017 Received - 30	FY2018 Received - 17	FY2019 - 1 <sup>st</sup> Qtr Received - 17
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**Licenses (in state/out of state based on address of record provided by licensee)**

Licensure renewal is completed. There was a fee reduction with this renewal and a change in expiration date. The expiration date is moved to June 30. This year's renewal will result in a license that is valid for 18 months.

**As of 11/29/18 (Total Licensees: 5,325)**

License Type	VA Active/Inactive	Out-of-State Active/Inactive	Total Active/Inactive
Audiologist	376/7	114/8	490/15
SLP	3469/33	591/45	4060/78
School SLP	375/2	24/3	399/5

**Continuing Education**

Continuing education (CE) audit was completed.

**Legislation/Regulation Activity**

None to report at this time

February 25, 2019

Board of Dentistry: Dr. James Watkins

—OUR BOARD MET ON DECEMBER 14<sup>th</sup>.

—Had public comment about concerns by the AAO for public harm to be expected from the at-home orthodontic kits provided by companies like SMILE DIRECT, etc. We were informed that there were complaints on the internet site YELP and that the Virginia component of AAO plans to submit a complaint to the dental board. (no action taken by our board yet).

—Had public comment about allowing chairside Blood Glucose screening in the dental office; however, Board counsel advised us that the Definition of Dentistry precludes that test in dental offices by dentists or dental hygienists.

—ADOPTED FINAL REGULATIONS FOR OPIOID PRESCRIBING IN DENTAL OFFICES.

—ADOPTED PROPOSED REGULATIONS FOR USE OF DENTAL SPECIALTIES.

—ADOPTED PROPOSED REGULATIONS FOR EDUCATION AND TRAINING OF DENTAL ASSISTANTS II.

—REVISED GUIDANCE DOCUMENT 60-25 TO REQUIRE CERTAIN CONTENT ON CLINICAL LICENSURE EXAMS FOR DENTISTS.

—BEGINNING IN 2020, OUR BOARD WILL BEGIN RENEWING OUR LICENSES BY BIRTH MONTH INSTEAD OF THE PRESENT MARCH 31<sup>st</sup> DATE EACH YEAR.

—ADOPTED OUR 2019 CALENDAR.

—OUR NEXT BOARD OF DENTISTRY MEETING IS MARCH 15<sup>th</sup>.



**Board of Long-Term Care Administrators**

**Last Meeting: December 13, 2018**

**Updates:**

- The Board recently completed the periodic review of its regulations for both Nursing Home and Assisted Living Facility Administrators, which was started in November 2016. The final regulations will become effective March 6, 2019. Of note, the new regulations tighten some of the requirements for supervision of administrators-in-training, make minor administrative changes, and broaden the Board's ability to take disciplinary action against administrators for a wider range of conduct that impacts the health and safety of residents and the public.
- This year, the Board will be taking a look at a number of issues related to the training of new administrators, including the impact of workforce and hiring issues and pathways to becoming an administrator, as well as ensuring preparation for work as an administrator through the administrator-in-training system or process.



Hoyle, Jalme &lt;jalme.hoyle@dhp.virginia.gov&gt;

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## Information regarding Argosy

1 message

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Stacey Camp <scamp@asppb.org>  
Reply-To: ASPPB BARC <ASPPB-ADMINS@listserv.asppb.org>  
To: ASPPB-ADMINS@listserv.asppb.org

Tue, Mar 19, 2019 at 12:44 PM

**Please see the message below from Mariann Burnettl-Atwell, PsyD, Chief Executive Officer, Association of State and Provincial Psychology Boards:**

Good afternoon,

I come before you today with no specific question, but with the hope of sharing some information.

For the past couple of weeks, we have been fielding calls from students and former students associated with Argosy University. These calls have been full of questions. Many of those questions focusing on how the closing of their school will impact their future and current careers in psychology, should I bank my credentials, how do I bank my credentials, what records should I bank, what records will state licensing board accept, etc.

Our staff has been doing a wonderful job to education the callers about the various resources available to them through ASPPB, and in reminding them of the importance to review the requirements of any state, territory or province they are interested in pursuing a future license to practice psychology.

In addition to these efforts, we have been working hard to find dependable information pertaining to the closing of Argosy campuses. This has been rather challenging. However, I have noted below, two links which contain helpful information from the Department of Education and the APA. It is my understanding that these links are being updated frequently.

Informational site from the Federal Department of Education :<https://studentaid.ed.gov/sa/about/announcements/closed-school>

FAQ page from APA targeted for Argosy students: <http://www.apa.org/apags/argosy>

As we work hard to assist these students during this very difficult time in their lives, please let me know if there is any assistance, we can bring to you or if you have resources that you would like to share with this listserv group.

Thank you for your time to read this and please take care. ~ Mariann

**Mariann Burnettl-Atwell, PsyD**

*Chief Executive Officer*

**Address: P.O. Box 849, Tyrone, GA 30290**



Hoyle, Jalme &lt;jaime.hoyle@dhp.virginia.gov&gt;

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**Former Argosy Students and Practicum Hours**

1 message

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**Kristen A. Hudacek** <khudacek@verizon.net>  
To: Jaime.Hoyle@dhp.virginia.gov  
Cc: "Hudacek, Kristen" <kristen.hudacek@dbhds.virginia.gov>

Mon, Mar 25, 2019 at 8:44 AM

Good morning Ms. Hoyle-

I am working to request direction from the Board related to hours for former Argosy students. We currently have 2 students we are providing a year-long practicum experience at Eastern State Hospital. I have been informed that The Chicago School of Professional Psychology (TCSP) will be taking all the students from the DC campus, sometime in early May, 2019, and plan to accept the hours accrued in the interim. In the interim, we are all wondering if the Board of Psychology will accept these hours their towards the experience/licensure in Virginia while they have no associated "program".

I have attached a letter drafted from the faculty of the TCSP program.

If the Board is able to make a recommendation, or sees any potential pitfalls or genera concerns, I'd be appreciate their direction.

I look forward to hearing from you.

Kristen Hudacek, Psy.D.  
Director of Psychology and Pretrial Services  
Eastern State Hospital

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**Practicum Letter - Virginia Board of Psychology.pdf**  
246K

Virginia Board of Psychology  
Perimeter Center  
9960 Mayland Drive, Suite 300  
Henrico, VA 23233-1463

March 18, 2019

Dear Board Members,

In conjunction with the American Psychological Association's Commission on Accreditation, The Chicago School of Professional Psychology (TCSPP) has reached a teach-out agreement with Argosy University. Per this agreement, Argosy's Northern Virginia Clinical PsyD students are able to matriculate into the TCSPP Clinical PsyD program, beginning May 2019.

We, at TCSPP, intend to accept the clinical training hours that students accrued through Argosy before they closed on March 8, 2019. We also intend to accept the hours that students continue to accrue during the current gap in university/school placements. Lastly, we will accept the hours students accrue after they matriculate into our program. These hours will collectively count toward the requirements for successful completion of their practicum/externship year.

We have written letters of support for the pre-doctoral interns; similarly, we support the practicum trainees as well. We support their continued training as they work toward matriculation into our Clinical PsyD Program.

Respectfully,

*Shavonne J. Moore-Lobban, PhD*

**Shavonne J. Moore-Lobban, Ph.D.**  
Director Of Clinical Training  
The Chicago School of Professional Psychology  
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