

Washington University Transgender Center Internal Review
Summary of Conclusions
April 21, 2023

OVERVIEW

On February 9, 2023, an article published in the online media outlet The Free Press outlined a series of allegations of inappropriate conduct at the Washington University Transgender Center (the Center). The author of the article also made similar allegations directly to the Missouri Attorney General.

When the University became aware of these allegations on the day of the article's publication, Chancellor Andrew D. Martin immediately initiated a comprehensive analysis of procedures followed and care provided to patients and families at the Center. The University, in collaboration with St. Louis Children's Hospital, also created an Oversight Committee charged with weekly review of Center activities. The committee was also directed to provide additional education on consent procedures, adverse event reporting, and protection for employees, patients, family members, and other individuals who report concerns.

The allegations concerned Center practices involving the prescription of medication to patients under the age of 18, specifically with regard to parental consent and mental health evaluation; patient reactions to prescription medications; and gender-related surgeries on patients under the age of 18.

This report represents a summary of the University's conclusions.

REVIEW PROCESS

The University's focus has been on the allegations made, with a particular emphasis on allegations of patient harm and the consenting process. The University's goal was to ensure care provided at the Center is consistent with recognized standards of care. Specifically, the University was committed to ensuring the policies and procedures of the Center follow standards of care adopted by the World Professional Association for Transgender Health (WPATH) and the Endocrine Society. Those standards have been recognized by the American Academy of Pediatrics, American Medical Association, and American Psychological Association.

In addition to reaching the conclusions described below, the University has also produced information and documents to state and federal officials who had opened their own inquiries into

the Center. The University provided a large number of documents to the Missouri Attorney General in response to his ongoing review; responded specifically to the allegations made about consenting, mental health treatment, and alleged patient harm; and also gathered information in response to questions from U.S. Senator Josh Hawley. The University has reached the following conclusions, which are described below.

CONCLUSIONS

After careful consideration over the course of a more than an eight-week period, the University has concluded that allegations of substandard care causing adverse outcomes for patients at the Center are unsubstantiated.

Washington University physicians and staff at the Center follow appropriate policies and procedures and treat patients according to the currently accepted standard of care, as recommended by the American Academy of Pediatrics and other nationally recognized organizations.

While not based on deviations from accepted practice or adverse outcomes for patients, the University has determined that a more detailed and formalized approach to the Center's process for documenting parental consent and obtaining custody documentation is warranted and that the University should take a more organized approach in responding to any requests of public engagement on the matter of transgender care. The University has committed to making these adjustments.

- A total of 1,165 patients have sought care at the Center since June 2018. These interactions range from an informational phone call to medical treatment but were of sufficient depth to create a medical record for each patient. All patients seen at the Center have a medical record.
- These patients account for approximately 6,000 visits to the Center for counseling and/or medical care during that time period. Note: Many patients visited the Center more than once and additional visits were made by patients to psychologists affiliated with the Center at St. Louis Children's Hospital.
- Of the Center's 1,165 patients, 531 received cross-sex hormones, including some who were initially on puberty blockers, some who were started on these medications by Center providers, and some who had existing prescriptions for these medications from unrelated physicians when they first arrived at the Center. An additional 67 patients were prescribed puberty blockers and not cross-sex hormones. The remainder (567 patients) were not prescribed puberty blockers or cross-sex hormones.

- Interviews with Center providers and a review of medical records identified no patients who had adverse physical reactions caused by medications prescribed by Center providers.
- Appropriate mental health assessment and/or intervention was, and is, required for all medical treatment provided to patients under the age of 18. The Center's practice is to require a letter of support from a licensed mental health provider who has treated the patient before prescribing puberty blockers or cross-sex hormones. Letters of support provided to the Center reflect individualized review and assessment of patients. Records indicate most patients had ongoing relationships with mental health providers and the Center providers recommend resources to patients who may need ongoing treatment for mental health concerns. Mental health care and counseling is a priority at the Center.
- Care for patients under the age of 18 is provided with appropriate and well-documented parental consent, as required by the University and the state of Missouri and consistent with the general practice for prescribing medication to minors by University physicians.
- The Center's practice includes obtaining and documenting consent from parents (including in instances where court orders governed which parent had authority to consent) or, when appropriate under the circumstances, from guardians.
- Center providers have not referred patients under 18 for gender-affirming surgery since late 2018 when the Center adopted a policy prohibiting these referrals. Upon request, some families were provided with the names of surgeons (including Washington University physicians) who provided such surgeries, and the Center's providers have provided summaries of care for patients desiring surgical interventions.
- There have been a total of six surgeries identified that were performed by Washington University physicians since 2018. These were all chest surgeries for adolescents transitioning to male. These were all referrals from other medical providers or patient-initiated self-referrals, not a result of direct Center provider referrals. As noted above, Center providers would provide summaries of care for patients to their surgeons. Chest masculinization surgery for minors is within the defined standard of care when clinically and developmentally appropriate as determined by an experienced multidisciplinary team
- Washington University physicians no longer perform gender-affirming surgeries on patients under the age of 18.
- The Center engaged in a number of educational and outreach seminars, often for groups of faculty and staff of public school districts. The University recognizes the need to provide education on the topic of gender affirming care and treatment and reasonable accommodations for transgender students. Given the sensitivity of these issues, the

University has determined that it would be helpful to introduce more internal oversight of these sessions.

RECOMMENDATIONS

While the University's review concluded that Washington University physicians adopted appropriate policies and procedures to treat patients according to the currently accepted standard of care, it also identified four areas for improvement. The University is making a commitment to the following:

- While appropriate parental consent has been obtained verbally and documented in the medical record, the additional protocols recommended by the Oversight Committee for documenting parental consent to ensure a consistent process is followed by all staff and physicians who interact with patients under age 18 should be made permanent. Specifically, the University has decided to take the additional step of requiring specific written consent prior to prescribing gender affirming medications. The University has reviewed the consenting process and made these updates to the Center's protocol.
- The Center has adopted a process of requiring a family to provide custody agreements before an initial visit at the Center by a patient under age 18. Prior practice had been to obtain the custody agreement before medical intervention in cases where decision-making authority was in question.
- The University has undertaken additional efforts to reaffirm its policy prohibiting gender-affirming surgery to the Departments of Pediatrics and Surgery.
- In addition to recommendations directly related to the allegations, the University also determined in the course of its review that there is an opportunity to be more intentional about public engagement on the topics of gender dysphoria and transgender care. The University will review its procedures for engaging with members of the community, particularly as it pertains to guidance provided to local school administrators and educators. Note: Public outreach by knowledgeable providers is within the WPATH standard of care.

The University is analyzing the impact of the Missouri Attorney General's emergency regulation of April 13, 2023.