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September 15, 2017

ANA Ethics Advisory Board

Submitted online at:

<http://www.nursingworld.org/MainMenuCategories/ThePracticeofProfessionalNursing/Call-for-Public-Comment/PublicComment-NursingAdvocacyGenderDiversePopulations.html>

**RE: Call for Public Comment: Nursing Advocacy for Gender Diverse Populations**

Dear colleagues,

We at the Fenway Institute write to provide public comment regarding the Proposed Statement, *Nursing Advocacy for Gender Diverse Populations*, from the American Nurses Association (ANA). The Fenway Institute works to make life healthier for those who are lesbian, gay, bisexual, and transgender (LGBT), as well as people living with HIV/AIDS and the larger community. We do this through research and evaluation, education and training, and policy analysis. We are the research division of Fenway Health, a federally qualified health center that serves about 30,000 patients each year.

**Page 1, Lines 1-18 (75 words)**

We agree that LGBT people have unique healthcare needs and face significant obstacles in accessing care. We commend the ANA's commitment to increased consideration of the needs of LGBT people in the areas of health policy, practice, education and research. Because you are referring to both sexual orientation and gender identity, we would recommend using "sexual and gender minority populations" or "sexual and gender diverse populations" rather than "gender diverse populations" in line 6.

**Page 1, Lines 19-28 (75 words)**

We agree with and support the "Statement of ANA Position." Discrimination in healthcare continues to be a major barrier to accessing care for many LGBT people. In order to reduce the health disparities that disproportionately burden LGBT people, it is essential that all healthcare providers, including nurses, be able to provide culturally competent care and advocate for their LGBT patients.

**Page 2, Lines 29-52 (75 words)**

We agree that the new proposed Position Statement, *Nursing Advocacy for Gender Diverse Populations*, is very much in line with the *ANA Code of Ethics with Interpretive Statements*.

**Page 3, Lines 54-82 (75 words)**

We agree that in recent years, many professional health organizations and federal organizations have been recommending increased efforts to reduce LGBT health disparities and increase health outcomes research and SOGI data collection. The proposed Position Statement is in line with recommendations from the Institute of Medicine, the Joint Commission, Health People 2020, and CMS.

**Page 4, Lines 83-101 (75 words)**

We appreciate ANA's long history of opposing sexual orientation discrimination in healthcare. For the sake of accuracy, please characterize the 1978 stance as "anti-LGB discrimination" (line 83); sexual orientation is different from gender identity. Similarly, the 1993 policy banned openly homosexual people from serving, so please change "LGBTQ" (lines 93, 94) to "openly homosexual" and "gay and lesbian," respectively. The proposed Position Statement would fall in line with these previous position statements.

**Page 5, Lines 102-137 (75 words)**

We support this list of recommendations. In order to follow through on these recommendations, it will be important to provide LGBT cultural competency training to nurses. The National LGBT Health Education Center provides resources and trainings on this topic. We also commend the ANA's commitment to advocate for increased SOGI data collection and health outcomes research. We also commend the ANA's commitment to advocate for legislation that supports equal access to care for LGBT people.

**Page 7, Lines 138-198 (75 words)**

We commend the ANA for developing this statement. Given the growth in state religious refusal laws, which authorize health care providers and others to deny service to LGBT people based on moral or religious objection to same-sex relationships and LGBT people, the ANA's statement is even more important. Thank you for this opportunity to provide feedback.

Sincerely,

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Fenway Community Health Center

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