UNIVERSITY OF MARYLAND
UNIVERSITY SENATE

1100 Marie Mount Hall
College Park, Maryland 20742-4111
Tel: (301) 405-5805 Fax: (301) 405-5749
http://www.senate.umd.edu

April 21, 2015

Donald W. Webster
Chair, University Senate
Wye Research & Education Center
124 Wye Narrows Drive, POB 169
Queenstown, MD 21658

Dear Senate Chair Webster:

I am writing on behalf of the Senate Equity, Diversity, & Inclusion (EDI) Committee in regard to our charge on the "Policies and Procedures Governing Preferred/Primary Names and Sex/Gender Markers in University Databases" (Senate Doc. 14-15-03). The EDI Committee was originally charged by the Senate Executive Committee (SEC) with this review on September 9, 2014. The deadline for this charge is May 8, 2015. I am writing to respectfully request an extension for the EDI Committee's review of this important issue.

Because of the committee's other pressing charges during this academic year, including the "Review of Civility in the UMD Workplace Environment" (Senate Doc. 12-13-54) and the "Review of the Interim Sexual Misconduct Policy" (Senate Doc. 14-15-11), the EDI Committee has not had ample time to thoroughly consider the "Policies and Procedures Governing Preferred/Primary Names and Sex/Gender Markers in University Databases" charge. This multifaceted charge has a number of specific areas to be researched in order to fully consider this topic, and the EDI Committee believes that an extension will allow it to better complete its work.

We respectfully request an extension until December 18, 2015. Thank you for your consideration of this request.

Sincerely,

Terry Owen
Chair, University Senate Equity, Diversity, & Inclusion (EDI) Committee

Enclosure(s): Charge from SEC, dated September 9, 2014

Cc: Reka Montfort, Director, University Senate

University Senate
CHARGE

Date:	September 9, 2014
To:	Terry Owen Chair, Equity, Diversity, and Inclusion (EDI) Committee
From:	Donald Webster Chair, University Senate
Subject:	Policies and Procedures Governing Preferred/Primary Names and Sex/Gender Markers in University Databases
Senate Document #:	14-15-03
Deadline:	May 8, 2015

The Senate Executive Committee (SEC) requests that the Equity, Diversity, and Inclusion (EDI) Committee review the proposal entitled, "Policies and Procedures Governing Preferred/Primary Names and Sex/Gender Markers in University Databases" and consider whether changes to the current policies and procedures are necessary.

Specifically, we ask that you:

1. Consult with the proposer regarding his specific concerns.
2. Research the current policies and procedures governing changes to sex/gender markers and honorifics for all campus constituents (employees and students).
3. Research how information on sex/gender and honorifics of all campus constituents is stored in University databases.
4. Review policies and procedures for changing sex/gender markers and honorifics at peer and Big 10 institutions.
5. Consult with a representative from University Human Resources regarding current procedures for changing sex/gender markers and honorifics in personnel records.
6. Consult with a representative from the Office of Research Administration (ORA) on unit responsibilities for reporting gender information to grant funding agencies.
7. Consult with a representative from Institutional Research Planning and Assessment (IRPA) regarding federal and state reporting guidelines related to gender.

8. Consult with a representative from the Division of Information Technology regarding current information management systems for personnel and student records.

9. Consult with a representative of the Office of the Registrar regarding student records.

10. Consult with the University's Office of Legal Affairs on whether the State of Maryland's Office of the Attorney General has developed policies or guidelines regarding how sex/gender markers should be recorded for state employees.

11. Consider recommendations from the Senate Student Affairs Committee regarding the process for changes to preferred/primary name for students. The Student Affairs Committee is charged with researching the following by December 19, 2014:

    a. Current UM policies and procedures for changing student preferred/primary names on unofficial documents.

    b. Peer and Big 10 institution policies and procedures for changing student preferred/primary names.

    c. Requirements of the Office of the Registrar for recording a student's legal name versus preferred name in University records.

12. If appropriate, recommend revisions related to preferred/primary name, honorifics, and sex/gender markers to relevant University of Maryland policies and procedures.

13. Consult with the University's Office of Legal Affairs on any recommended policy revisions.

We ask that you submit your report and recommendations to the Senate Office no later than May 8, 2015. If you have questions or need assistance, please contact Reka Montfort in the Senate Office, extension 5-5804.

Cc: Gilbert Nuñez, Chair, Student Affairs

Attachment

University Senate
PROPOSAL FORM

Name:	Luke Jensen
Date:	August 2014
Title of Proposal:	Policies and Procedures Governing Preferred/Primary Names and Sex/Gender Markers in University Databases
Phone Number:	301.405.8721
Email Address:	ljensen@umd.edu
Campus Address:	2218 Marie Mount Hall
Unit/Department/College:	LGBT Equity Center
Constituency (faculty, staff, undergraduate, graduate):	Staff
Description of issue/concern/policy in question:	The University depends on employees and students to provide and update their personal information regarding how they are known on campus. This includes name and gender. Personal information is stored in separate databases, personnel files and student records. The nomenclature and processes for updating this information are quite different. There is no policy or mechanism for ensuring uniformity of data resulting in conflict between the two, a situation encountered by students who are also employees. Employees and students may be known by a name that is different than their legal name. These are recorded and used on campus. Legal names are retained for payroll, official transcripts, financial aid records, and other records where the use of the legal name is required by law or by University policy. Employees and students have the ability to update this information, but the nomenclature, manner, and flexibility to do so are quite different for employees and students. And, for those who are employee and student, the data may be in conflict resulting in unintended consequences. There is also a question of equity in the level of access given to employees and that given to students. A fuller description of the issue is found in **Appendix A: Use of a name other than the legal name**. Employees have the ability to update their gender at will. Students may update their sex in student records by submitting a request and

	supporting documentation. Gender is found in personnel files. Sex is found in student records. For those who are employee and student, the gender in personnel files does not necessarily match the sex found in student records. There appears to be no statement for either employees or students on why this information is collected and how it is used. The only options for both employees and students for gender and sex are female and male. This does not accommodate those who identify as neither including those with passports from countries that allow for a third option. Also, there appears to be no option for those who wish to not disclose. A fuller description of the issue is found in **Appendix B: Gender and sex in personnel files and student records**. The University asks employees how they wish to be addressed. The options include n/a, Mr., Ms., Miss, Mrs., and Dr. These data are stored in employees' Personal Information as "prefix name" and may be changed by the employee at will. No such courtesy is offered to students. For correspondence, a variety of campus units appear to access the sex (or gender) field in student (or employee) records and simply add a Mr. or Ms. in front of the name. This practice ignores how individuals wish to be addressed, allows for only two options, and may be incorrect, confusing, embarrassing, and call attention to difference thus inviting harassment. A fuller description of the issues is found in **Appendix C: Use of honorifics based on gender or sex**.
Description of action/changes you would like to see implemented and why:	The University of Maryland should establish clear policies using common nomenclature and processes for both employees and students who wish to update their personal information including but not limited to name and gender. It should provide greater flexibility regarding gender by allowing individuals to opt out of answering, and it should not rely on gender or sex markers in personnel files or student records for the use of honorifics. Policies should ensure that both employees and students *continue* to have the ability to use a name other than their legal name including a first, middle, and last name, and they should both have the ability to update that information whenever they deem appropriate. Policies should insist on uniformity between personnel files and student records. They should also name campus administrators who will be responsible for implementation and consistency. Policies on the use of a name other than a legal name would ensure that employees and students are able to continue to have this ability and that the use of this name would be respected across all units.

	Such policies would also reduce confusion and eliminate conflicting data between personnel files and student records. The University should be clear on the data it collects regarding gender and sex, and should disclose how these data are used and who has access to them. The data collected should be the same for employees and students. Both employees and students should have the same ability to update their gender and sex information. Providing this information should be optional. This would accommodate those who identify as neither and those with international documentation that has a third option. No unit of the University should rely on a gender or sex marker for the choice of an honorific. Honorifics should be used only when formality requires its usage. Both employees and students should have the ability to choose the honorific appropriate for them. This should include Mx., an honorific that does not rely on gender or an advanced degree, and both should have the ability to opt out of any honorific. Such a policy would ensure that individuals are addressed appropriately thus avoiding confusion, embarrassment, and reducing opportunities for harassment.
Suggestions for how your proposal could be put into practice:	Most of the issues noted above arise from lack of coordination, lack of clarity, too few options, and the need for equity between employees and students when updating personal information. These could all be resolved successfully with University-wide policies. The specifics on how to update personal information could be technological through the use of existing software.
Additional Information:	**Appendix A: Use of a name other than the legal name** **Exhibit 1: Screen shot of Employee Data Verification Page in ARES** **Exhibit 2: Preferred name form used by students** **Appendix B: Gender and sex in personnel files and student records** **Appendix C: Use of honorifics based on gender or sex** **Appendix D: Data from outside sources** **Appendix F: Responses to anticipated questions**

Please send your completed form and any supporting documents to senate-admin@umd.edu or University of Maryland Senate Office, 1100 Marie Mount Hall, College Park, MD 20742-7541. Thank you!

Appendix A: Use of a name other than the legal name

Current status

All employees may use a "primary name" including first, middle, and last for use in public directories and ID cards. Their "payroll name" is their legal name. The two do not have to match. Employees may access their personal information via ARES and update (change) their "primary name" at will. See Exhibit 1.

All students may use a "preferred name" including first, middle, and last for use in directories, class rosters, and ID cards. Their legal name is used for their transcript and financial aid documents. The two do not have to match. Students may request to use a preferred name by submitting a paper form to the Office of the Registrar. See Exhibit 2.

Individuals who are both students and employees must submit a paper form to the Registrar and update their "primary name" in ARES. If they submit the form, but fail to make the change in ARES, our systems will overwrite whatever the Registrar has and display their "primary name" in online directories and in class rosters. If the student/employee does not designate a "primary name," their legal name is the default option. The problem becomes evident when a student is hired as an employee on campus while already using a "preferred name." Unless they are informed about how our systems work and about their ability to update their "primary name," their legal name starts appearing in directories and class rosters.

It would appear that student employees could simply skip filing a form with the Registrar and change their "primary name" at will via ARES. It is unknown if any individual has done so.

Although employees may use a "primary name" from their date of employment, most are unaware of this option. Currently, students become aware of the option of using a "preferred name" by visiting the web site of the LGBT Equity Center or by word of mouth. Incoming students are beginning to discover this option with a small number now requesting the use of a "preferred name" before they register for classes.

Requested Change

Both employees and students should be able to *continue* using a name other than their legal name except where a legal name is required. This includes first, middle, and last names. Instances where a legal name must be used include payroll, official transcripts, and financial aid documents. The systems should be harmonized using the same terminology. Recommended usage would be "primary name" for both employees and students. The legal name could be referenced as "payroll name" and "transcript name." Harmonization of terminology would reduce confusion about which name is used where for both the user and University officials.

The systems should be harmonized so that a primary name in one system will always be the same in the other system. Ensuring the primary name is in both employment and student records would eliminate unwanted appearances of the legal name and its attendant

consequences. (It is assumed that databases relying on either employment or student records, e.g., health records in the University Health Center, would also have the updated information.)

The process for updating a primary name should be the same for employees and students. One recommended process would be an online request similar to one used at the University of Michigan. Another option would be to give students the same ability to update their personal information that employees now enjoy. A single process would bring greater clarity about the use of a primary name for both the user and University officials.

Updating a primary name should be at will for both employees and students. Any disclaimer should be the same for both. This could be an attestation that using a primary name other than the legal name is not for misrepresentation or to otherwise avoid a legal obligation. Language from the current Preferred Name Change Request Form could be added: "Requests will be approved except in circumstances that indicate that this request is for the purpose of misrepresentation, or to otherwise avoid a legal obligation."

Greater efforts should be made to inform new employees, including student employees, of their option to use a primary name that differs from their legal name. Applicants for admission to the University of Maryland should be given the option of using a primary name that differs from their legal name on the application.

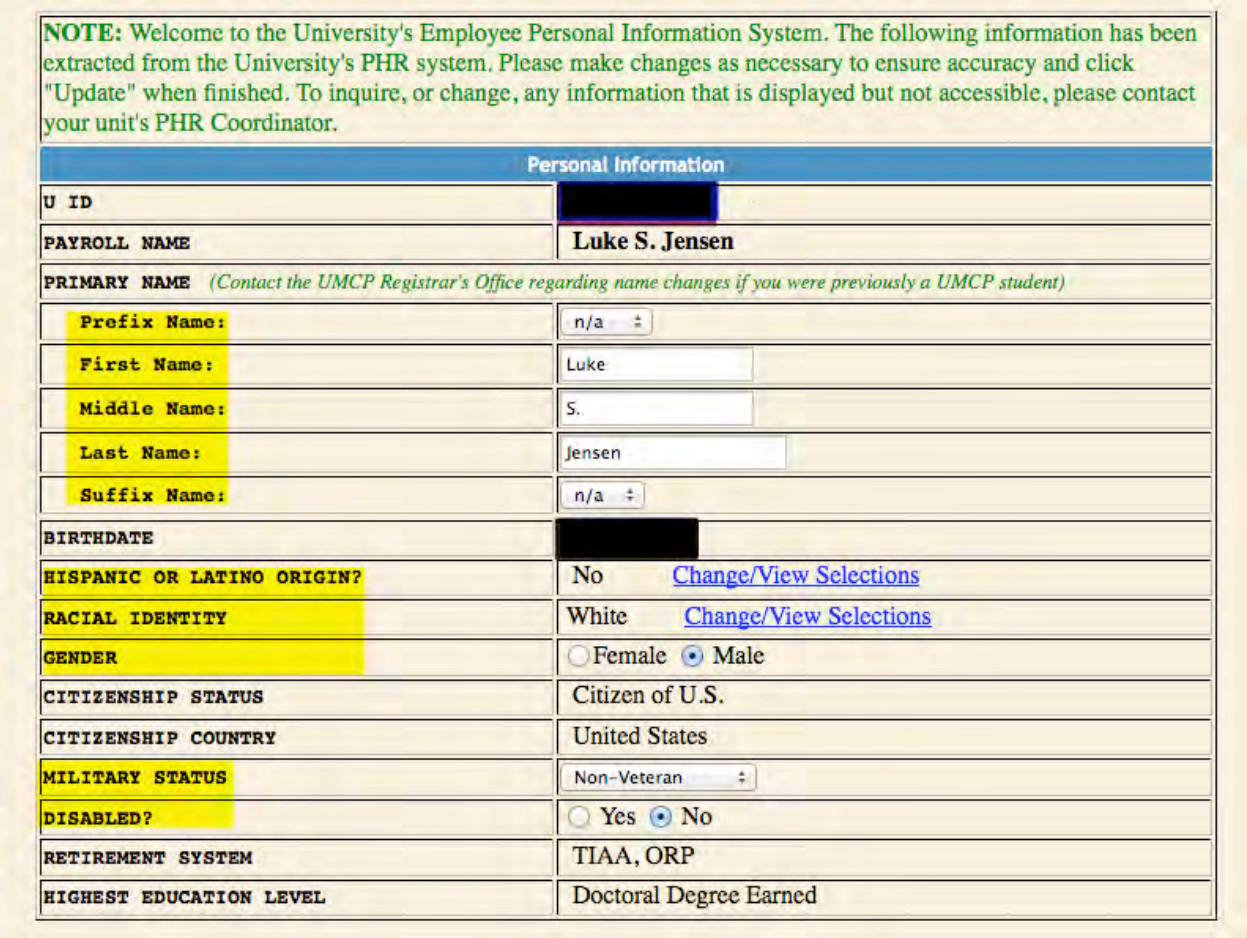
The process for changing the payroll and transcript name (a legal change of name) should be clearly stated. Such a change would require evidence of a legal change of name in process or completed. Publicly known policies would provide greater transparency for both users and University officials.

Suggested implementation

University policies should be established that clearly outline what is available to students and employees regarding the use of a name other than a legal name. The policy should reflect the requested changes. While the exact process for updating a primary name would likely be technological, the policy should identify who is responsible for overseeing a single process and for harmonizing employment and student records.

One example of a single process for employees and students exists at the University of Michigan. See http://www.itcs.umich.edu/itcsdocs/r1461/.

Exhibit 1: Screen shot of Employee Data Verification Page in ARES



NOTE: Welcome to the University's Employee Personal Information System. The following information has been extracted from the University's PHR system. Please make changes as necessary to ensure accuracy and click "Update" when finished. To inquire, or change, any information that is displayed but not accessible, please contact your unit's PHR Coordinator.

Personal Information	
U ID	[redacted]
PAYROLL NAME	Luke S. Jensen
PRIMARY NAME *(Contact the UMCP Registrar's Office regarding name changes if you were previously a UMCP student)*	
Prefix Name:	n/a
First Name:	Luke
Middle Name:	S.
Last Name:	Jensen
Suffix Name:	n/a
BIRTHDATE	[redacted]
HISPANIC OR LATINO ORIGIN?	No Change/View Selections
RACIAL IDENTITY	White Change/View Selections
GENDER	○ Female ◉ Male
CITIZENSHIP STATUS	Citizen of U.S.
CITIZENSHIP COUNTRY	United States
MILITARY STATUS	Non-Veteran
DISABLED?	○ Yes ◉ No
RETIREMENT SYSTEM	TIAA, ORP
HIGHEST EDUCATION LEVEL	Doctoral Degree Earned

Items highlighted in yellow may be updated at will by the employee.

Exhibit 2: Preferred name form used by students

UNIVERSITY OF MARYLAND

Preferred Name Change Request Form

Date: _____

UID Number ___ ___ ___-___ ___-___ ___ ___ ___

Legal Name _____ _____ _____
(first) (middle) (last)

Name currently listed on University of Maryland records (if different from above)

_____ _____ _____
(first) (middle) (last)

Requested preferred name(s)

_____ _____ _____
(first) (middle) (last)

I understand that by completing this form and signing below, I am authorizing the University of Maryland College Park to use my preferred first and/or middle and/or last name(s) on student identification cards, class lists, and student directories only. My preferred first/middle/last name(s) will be linked to my full legal name, University and Student Identification numbers, which will continue to be shown on my transcripts, financial aid records, and other records where use of the legal name is required by law or University policy.

The use of preferred first and/or middle and/or last names will be approved at the discretion of the Office of the Registrar. Requests will be approved except in circumstances that indicate that this request is for the purpose of misrepresentation, or to otherwise avoid a legal obligation.

I have read and understand the above information.

_____ _____
Signature Date

Internal Office use only

_____
Staff Signature/Approval Date

Appendix B: Gender and sex in personnel files and student records

Current status

Personnel files for employees contain a field for "gender." Student records contain a field for "sex." These data are used in various known and unknown ways.

Employees may update their gender by accessing their personal information through ARES. They are forced to choose either female or male. Individuals who identify as neither must pick one or the other. It is unknown what would happen should someone be hired with international documentation indicating something other than female or male.

The data fields in student records include one for sex and are populated from the application. There has been some confusion on what students have been asked. Online applications appear to ask sex while some of the recent paper applications asked gender. Sex and gender are not synonyms and we should not be confusing the two.[1] Thus, we are recording information from some of our students that we did not ask. We do not know all the ways these data are used, thus we do not know the number of problems caused by this discrepancy.

Students may update the sex field in their student records by providing documentation. This may be a government issued document (driver's license, passport, etc.) with the corrected data, or documentation from either a medical health care provider *or* a mental health care provider. In practice, students provide this documentation to the Director of the LGBT Equity Center who then attests to the Office of the Registrar that he has reviewed the documentation and requests the field be changed.

Students also have only two options: female and male.

It is unknown what the University does (would do) with an international student holding a passport with a sex other than female or male.

Requested change

The University should be clear on the data it is collecting. The University should state why the data are being collected and give some indication as to who has access to this personal information. The University should also make all efforts to ensure that usage of this information is legitimate and necessary.

The University should not require anyone to supply this personal information and should state that responding is optional on all applications. Individuals holding a passport indicating

[1] Sex references the physical body, usually female or male, although some do not fall easily into one or the other classification. Gender references social role and self-concept, usually woman or man aligning with female or male, although such an alignment does not hold true for some including some who do not fit a simple binary for distinguishing sex.

something other than female or male should at least be able to opt out of answering questions on gender or sex. Transgender individuals should also be able to opt out of answering questions related to sex or gender.

Both employee and student records should allow for a non-response.

Students should be given the same access to updating their gender or sex that employees have. That would include changing a response of female or male to a non-response.

For any internal or external reports, the University could simply indicate an unknown or non-response percentage for those who choose to not answer.

Access to any space, such as the residence halls, or program, such as athletics, where gender or sex may be a factor, the unit administering that space or program should not depend solely on any gender or sex marker in personnel files or student records. An individual's sex, self-identified gender identity and expression, and requests based on personal need are all factors that should be taken into consideration. And, while taking all these factors into consideration, the unit should also seek to maximize that individual's access and participation.

Suggested implementation

The University of Maryland should handle gender on its application as the University of California. (See https://admissions.universityofcalifornia.edu/applicant/html/caq.html then click on "personal information.") They state why they collect these data and that providing the information is optional. There is no penalty for choosing to not answer.

In addition to female and male, employees could have the ability to "unclick" or withdraw their current gender information. Or, a "non-response" option should be added. Students could be given the same opportunities via existing mechanisms for updating personal information.

Appendix C: Use of honorifics based on gender or sex

Current status

The University asks employees for a "prefix name" which is an honorific. The options are n/a, Mr., Ms., Miss, Mrs., and Dr. They are used in public directories. It is unclear if they have any other purpose.

Students receive correspondence from different campus units using an honorific. Because students are not asked which is appropriate for them, the campus unit simply picks one based on the sex field in student records. So, for example, a student utilizing a preferred name of "Mary Smith" where the sex field is marked "male" will receive correspondence addressed to "Mr. Mary Smith" or "Mr. Smith." Such a result is confusing, perhaps embarrassing, and may invite harassment. Anyone handling such correspondence would be immediately alerted that there is something not quite right. We know that transgender individuals suffer a disproportionate amount of harassment, both verbal and physical. By calling attention to a person's status as transgender, we may create a circumstance that invites harassment. Also, refusing to reference someone by their stated gender may in itself be regarded as a form of harassment.

Requested change

The University should establish a campus-wide policy regarding the use of gender and sex data in personnel files and student records. The policy should state that using gender or sex data for the choice of an honorific is inappropriate and not a legitimate use of that data.

The University should determine if there is sufficient need to collect data on honorifics for students. If not, no honorifics should be used for students. If there is sufficient need, the University should include a choice of honorific on its application and it should be added to student records just as it currently exists for employees. Students should be given the same ability to update their honorific that employees currently have and it should be harmonized with personnel files in the same manner as suggested for primary name.

Any use of an honorific by a campus unit should be based only on what that individual has indicated in either personnel or student records, and should *not* be based on the gender or sex marker in their personnel file or student record.

The choices of an honorific should include Mx., an honorific that does not depend on either gender or an advanced degree. Also, individuals should be allowed to opt out of any honorific.

Suggested implementation

For employees, simply adding Mx. as an option to their personnel file would be sufficient. For students, a choice of honorific could be added to the application and to student records. Students should be able to update their honorific in the same manner suggested for updating their primary name.

Appendix D: Data from outside sources

From the University of Michigan comes an example of a single process for employees and students to utilize a name other than the legal name. See http://www.itcs.umich.edu/itcsdocs/r1461/.

From the University of California (See https://admissions.universityofcalifornia.edu/applicant/html/caq.html then click on "personal information.")

> Why do you want to know my gender and ethnicity?
> This information is used for statistical purposes only by UC, government agencies and researchers. Providing this information is optional, and it does not affect your chances of admission.

Campus Pride identifies 47 colleges that allow students to change their gender marker with no evidence of medical intervention. At least eight do so with a simple request by the student. See http://www.campuspride.org/tpc-records/.

By simple request, students at the University of California, Santa Cruz, may change their gender/sex marker to "u" for "unknown" or "undetermined." See http://registrar.ucsc.edu/forms/students/preferred-name.pdf.

U.S. Department of State guidelines for updating your passport regarding gender: http://www.travel.state.gov/content/passports/english/passports/information/gender.html.

To update gender on passports from New Zealand, applicants need only provide a "Statutory Declaration indicating the sex / gender identity you wish to be displayed in your passport (M, F or X)" and "How long you have maintained your current sex / gender identity." See http://www.passports.govt.nz/Transgender-applicants.

Australians may update the gender in their passports in the same manner as U.S. citizens. However, they have X as a third option. See https://www.passports.gov.au/web/sexgenderapplicants.aspx.

Indications of numbers of transgender people as estimated by scholars at the Williams Institute may be found at http://williamsinstitute.law.ucla.edu/research/census-lgbt-demographics-studies/how-many-people-are-lesbian-gay-bisexual-and-transgender/.

The most comprehensive study of the discrimination faced by transgender people, "Injustice At Every Turn," may be found at http://endtransdiscrimination.org/PDFs/NTDS_Report.pdf.

Appendix F: Responses to anticipated questions

Why should the university allow individuals to use a name other than their legal name?

One reason is professional courtesy. It is to the institution's advantage to publicly name individuals who may have a professional name that differs from their legal name. For example, world-class musicians and other performing artists are frequently known by a name other than their legal name. It would be ludicrous to insist that they be listed in directories and on ID cards under their legal name.

Another identifiable group of individuals using a name other than a legal name would be international constituents. While some may insist that everyone do their best in pronouncing their name, others may tire of hearing their name consistently mangled and choose to use a name on campus that is more common in the United States.

Some individuals may come to an awareness of being transgender over time. Their legal name may no longer match who they are and how they present themselves on campus. As with professional courtesy, it benefits the institution to have people listed in directories, on class rosters, and holding ID cards that match how they are known on campus from day to day.

Such individuals may eventually seek to change their name legally. Others may find it particularly onerous to do so. A lengthy process may be required. Use of a name other than a legal name allows for the University to recognize individuals as they evolve regardless of where they may be in a legal process. Doing so assists the University in providing a safe and supportive learning environment.

Clear and easy-to-find policies on the use of a name other than a legal name, and the process for updating a legal name, would provide transparency and a clear pathway for all.

Doesn't the gender of employees need to match the data held by the Social Security Administration?

No. The Social Security Administration stopped issuing no-match letters for gender effective September 24, 2011. See http://www.socialsecurity.gov/employer/ssnvshandbk/return.htm. Also, updating data with the Social Security Administration is the responsibility of the employee, not the University.

What are the implications for students and the Selective Service?

Students identified as male on their birth certificates must register with the Selective Service to be eligible for federal student financial aid. This is the responsibility of the student, not the University. See http://www.finaid.org/students/selectiveservice.phtml, especially the section on "Transgender Students" and the link to their "Guide to Completing the FAFSA for LGBT Families" found at http://www.finaid.org/fafsa/lgbtfafsa.phtml#selectiveservice.

It would appear that accommodating transgender individuals is the primary rationale for most of the issues outlined. Why should we go to so much effort for so few?

Two responses: these policies would benefit all, not only transgender individuals; and regardless of numbers (see below), the University should be creating a supportive and empowering work and learning environment for all.

As mentioned above, use of a name other than a legal name benefits at least three identifiable groups. They include those whose professional name differs from their legal name, individuals with international documentation or who otherwise have names that are difficult to pronounce by most individuals on campus, and transgender people. Of course, there are additional individuals who use a different name for personal reasons and find it otherwise unnecessary, or difficult, or inconvenient, or even impossible to obtain a legal change of name.

According to a 2011 report issued by Gary J. Gates and published by the Williams Institute, a national think tank located at UCLA Law, approximately 0.3% of the U.S. population is transgender. See http://williamsinstitute.law.ucla.edu/research/census-lgbt-demographics-studies/how-many-people-are-lesbian-gay-bisexual-and-transgender/. That translates to about 130 students, staff, and faculty on campus, and even more of our alumni. This number does not account for gender variant and genderqueer people who may not self-identify with the word "transgender."

Ultimately, the issue is about impact, not numbers. Gender identity and expression are now protected classes in the State of Maryland. The University should create policies to minimize discrimination and harassment.

According to "Injustice At Every Turn," the largest survey of transgender and gender variant people in the United State, (see http://endtransdiscrimination.org/PDFs/NTDS_Report.pdf), 22% of trans people report having been harassed or disrespected by a government agency or official, and 22% also report being denied equal treatment by a government agency or official. Having one's name, gender, and sex on records match a person's self-identification is important for many reasons, but it helps to reduce harassment. According to this same study, 40% of trans people who presented an "incongruent" identity document were harassed, 15% were asked to leave an establishment, and 3% were assaulted.

The same survey indicates that one third of transgender people who have transitioned have not updated their identity documents. Sometimes, this is due to the costs and inaccessibility of changing one's documents. But changing one's legal documents or having a medical procedure should not be a requirement to change one's sex in university records, which merely record what should be optional demographic data and does not serve as legal documentation. The American Medical Association issued a statement in June against the requirement of surgery in order to change government documents, citing that medical decisions and identity documents should not be intertwined as such. See http://www.marketwired.com/press-release/ama-calls-for-modernizing-birth-certificate-policies-1918754.htm.

More agencies and institutions are moving away from the requirement of medical documentation to change sex or gender in records. The country of Argentina passed a law in 2012 that created a simple administrative process for people to change their documents to match their self-perceived gender identity and name. Activists and advocates are asking for the same around the world. In fact, Campus Pride, a U.S. national LGBT higher education organization that produces the annual rating of LGBT-friendly colleges, now includes as one rating factor whether or not a university has a simple and accessible way for people to change their recorded sex or gender without having to furnish any medical documentation.