



Center for Public  
Representation



Disability Rights Education & Defense Fund

**JUSTICE IN AGING**  
FIGHTING SENIOR POVERTY THROUGH LAW

### **Disability Rights Groups Condemn Anti-Trans Rulemaking**

**December 18, 2025 - Washington, DC** – The undersigned national disability rights groups join in solidarity with the transgender community to denounce discrimination against transgender people, including those with disabilities, and to condemn the anti-trans actions by the U.S. Department of Health and Human Services (HHS) and this administration.

We reject recent efforts by the Administration to limit federal civil rights protections for individuals with gender dysphoria and impose hurdles to enforcing their rights under Section 504 of the Rehabilitation Act. Every person with a disability, including those with gender dysphoria, has a right to critically important protections such as equal opportunity in healthcare, education, housing, and employment. The proposed regulation, driven by clear animus and stigma, runs counter to these protections and undermines the rights of people with gender dysphoria.

People with gender dysphoria, especially those who are Black and brown, experience high levels of discrimination and marginalization in healthcare, employment, community, and educational settings. They experience much higher rates of mistreatment from health providers, including denial of care, harassment, and abuse. Efforts to strip those individuals of their rights under the law are abhorrent and inconsistent with HHS's core mission.

The existing HHS Section 504 regulation was issued after a robust rulemaking process, with widespread and bipartisan support. The preamble to that rule correctly notes that restrictions that prevent, limit, or interfere with otherwise qualified individuals' access to care due to their gender dysphoria, gender dysphoria diagnosis, or perception of gender dysphoria, may violate Section 504. This is consistent with court interpretations. The U.S. Supreme Court has made clear that statutory interpretation is the proper role of the courts, and that regulatory revisions of this nature should be scrutinized by the courts with a critical eye and, where appropriate, rejected or set aside.

The undersigned strongly oppose any regulations or government actions that perpetuate injustices and hinder the full integration, acceptance, and inclusion of transgender individuals,

including those with disabilities, in all aspects of society. We urge HHS to abandon its proposed change to its Section 504 regulation.

[American Civil Liberties Union](#)

[Bazelon Center for Mental Health Law](#)

[Center for Public Representation](#)

[Disability Rights Education and Defense Fund](#)

[Justice in Aging](#)

[National Health Law Program](#)