

# USA Climbing Policy – Transgender Athlete Participation

USA Climbing does not tolerate discrimination on the basis of race, color, religion, age, gender, sexual orientation, or national origin.

USA Climbing believes that every athlete should be allowed to compete in a respectful, safe and harassment-free environment. USA Climbing also believes that every athlete should be allowed to participate in fair competition in accordance with USA Climbing's rules, policies, and mission.



## Purpose & Scope:

The Transgender Athlete Participation Policy ("this Policy") sets forth the requirements and procedures to be followed by a USA Climbing athlete who desires to participate in a gender category that differs from the sex assigned to that athlete at birth.

This Policy is subject to periodic review, including but not limited to the incorporation of any new scientific and/or medical knowledge related to gender diversity and athletic performance.

## Policy:

All USA Climbing athletes are subject to doping control and must be aware of:

- [United States Anti-Doping Agency \(USADA\)](#) rules and policies
- [World Anti-Doping Agency \(WADA\)](#) rules and policies
- [Therapeutic Use Exemption \(TUE\)](#) rules and requirements

This Policy sets forth the requirements and procedures to be followed by a USA Climbing athlete who desires to participate in a gender category that differs from the sex assigned to that athlete at birth. Also included in this Policy is the review process to be followed should any concerns or grievances/appeals arise.

Any questions regarding this Policy may be directed to the USA Climbing Medical Review Panel at [medicalreview@usaclimbing.org](mailto:medicalreview@usaclimbing.org).

### 1 USADA/WADA and TUE

- 1.1 All athletes within USA Climbing, regardless of gender and competition level, are subject to doping control and must be aware of the [Therapeutic Use Exemption \(TUE\)](#) rules and requirements. When necessary, athletes should work with (a) licensed physician(s) and must apply for a TUE to ensure compliance with the [U.S. Anti-Doping Code requirements](#) domestically and [World Anti-Doping Code requirements](#) internationally. As set forth in Section 8 below, the USA Climbing Medical Review Panel is available to assist athletes if desired.
- a) TUE forms must be submitted for any athlete, regardless of gender, who is taking a prohibited substance(s) under the [U.S. Anti-Doping Code requirements](#) domestically and [World Anti-Doping Code requirements](#) internationally.
  - b) For transgender athletes, TUE applications are required for testosterone and spironolactone.
  - c) Where TUE requirements are unclear, such as in the case of GnRH (gonadotropin releasing hormone) analogues, the athlete should consult with a licensed physician and may be asked to submit applicable medical information.
  - d) Checklists for Therapeutic Use Exemption (TUE) Application for Transgender and Non-Binary Athletes may be found here: [USADA TUE](#), [WADA TUE](#).

### 2 Non-International-Track Participation Policy

- 2.1 Non-International-Track Participation is defined as:
- a) Youth Series participation in the Youth C and Youth D Categories

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- b) Recreational Series participation  
(a Recreational Series pilot program is planned for 2023-2024, unrelated to this Policy)
  - c) Collegiate Series participation in the Collegiate Recreational Categories
- 2.2 Athletes electing Non-International-Track Participation may compete in USA Climbing-sanctioned competitions in accordance with their gender identity, without restriction.
- 2.3 Athletes wishing to make updates to their USA Climbing Membership profile may contact [info@usacimbing.org](mailto:info@usacimbing.org) for assistance.

## 3 International-Track Participation Policy

- 3.1 International-Track Participation is defined as:
- a) Youth Series participation in the Youth B, A and Junior Categories  
(e.g., Youth Qualification Events, Regionals, Divisionals, Nationals, and IFSC events)
  - b) Elite Series participation  
(e.g., NACS, Nationals, Team Trials, IFSC events, )
  - c) Collegiate Series participation in the Collegiate non-Recreational Categories  
(e.g., Collegiate Qualification Events, Divisionals, Nationals, and IFSC events)
  - d) Paraclimbing Series participation  
(e.g., Paraclimbing Nationals, IFSC events)
  - e) all other participation not listed as Non-International-Track in 2.1.
- 3.2 Oversight of International-Track Participation includes a USA Climbing Medical Review Panel, as set forth in Section 9.
- 3.3 Participation in qualification competitions in one gender category does not provide for eligibility in a different gender category. For example, Youth QE participation in one gender category does not provide eligibility for Youth Regionals in a different gender category.
- 3.4 An athlete desiring International-Track Participation in a gender category different from the athlete's assigned sex at birth is subject to the following:
- a) The athlete (or the athlete's legal guardian) must submit a written and signed statement of gender declaration to USA Climbing's Medical Review Panel as outlined in Section 6.
    - i) A statement of gender declaration is required to notify USA Climbing of an athlete's intent to participate in International-Track competitions in a gender category different from the athlete's assigned sex at birth. In order to compete in a gender category (regardless of whether it is different from the athlete's assigned sex at birth, or not), the athlete must meet the medical and policy requirements of that gender category, including, but not limited to, 3.5 and 3.6 below.
    - ii) A statement of gender declaration does not expire. (i.e., the athlete does not need to (re)submit a statement of gender declaration if there are no changes/updates to be submitted.)
    - iii) A statement of gender declaration must be submitted at least six (6) weeks in advance of the first USA Climbing-sanctioned, International-Track event in which that athlete seeks to participate in a gender different than the sex assigned at birth.
    - iv) The athlete may change a declaration of gender by submitting a new written and signed statement of gender declaration to USA Climbing's Medical Review Panel; however, the athlete cannot change the declaration more often than every two (2) years.
    - v) USA Climbing does not require any specific evidence or proof (e.g., a government-issued or school-issued identification, etc.) to support a statement of gender declaration.
  - b) An athlete may be subject to further individual review by the Medical Review Panel if there are concerns regarding course of treatment or adherence to USADA/WADA policies.
- 3.5 All International-Track Participation is subject to the following table:

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Assigned Sex at Birth	Participation Gender	Policy
Female	Female	An athlete who has, in the past or currently, initiated medical transition to male or who has otherwise begun taking testosterone is required to adhere to all USADA/WADA and TUE policies.
Female	Male	An athlete who has, in the past or currently, initiated medical transition to male or who has otherwise begun taking testosterone is required to adhere to all USADA/WADA and TUE policies.
Male	Female	An athlete: <ol style="list-style-type: none"> <li>1. Must maintain a testosterone level less than five (5) nmol/L for the 12-month period preceding the athlete's first International-Track participation. Official laboratory reports of the athlete's testosterone levels at twelve (12) months, six (6) months and six (6) weeks preceding the International-Track competition must be submitted to and will be reviewed by the Medical Review Panel, as set forth in Section 7.</li> <li>2. Must maintain a testosterone level less than five (5) nmol/L for as long as the athlete wishes to maintain eligibility to compete in a female gender category. An official laboratory report of the athlete's testosterone level must be submitted to and reviewed by the Medical Review Panel every six (6) months on an ongoing basis, as set forth in Section 7; the Panel may request such laboratory reports for an athlete on a different interval and/or at any time as set forth in 3.7 below.</li> <li>3. The testosterone levels should be conducted by liquid chromatography coupled with mass spectrometry whenever possible.</li> <li>4. If the athlete is taking the antiandrogen/diuretic medication spironolactone, the athlete must apply for a TUE and must adhere to all guidelines set forth by USADA/WADA.</li> </ol>
Male	Male	An athlete must adhere to all USADA/WADA and TUE policies with no additional restrictions or requirements.

- 3.6 Participation at non-USA Climbing competitions may be subject to other rules and policies (e.g., IFSC) and therefore such participation may be further restricted. An athlete electing to compete within the United States in a gender category that differs from the athlete's assigned sex at birth accepts the risk of not being eligible for such non-USA Climbing competitions.
- 3.7 The Medical Review Panel has the authority to request and receive from an athlete (or the athlete's legal guardian) additional relevant information and/or documentation to determine adherence to this Policy.

#### 4 USA Climbing Membership ID

- 4.1 Each USA Climbing Membership ID ("Membership ID") is associated with a gender category (i.e., female or male).
- 4.2 If an athlete with an existing USA Climbing Membership ID wishes to participate in USA Climbing competitions in the opposite gender category, a new Membership ID must be created.

In this case, USA Climbing will work with the athlete (or the athlete's legal guardian) to create a new Membership ID, using the athlete's preferred name as indicated on the athlete's

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Statement of Gender Declaration and with the same expiration date as the original Membership ID, at no additional cost to the athlete.

## 5 Medical Review Panel Replies/Decisions

- 5.1 Upon receipt of a submission, the Medical Review Panel should provide a reply within 10 days to the individual submitter.
- 5.2 A Medical Review Panel reply may include one or more of the following:
  - a) An answer from the Medical Review Panel to a question submitted.
  - b) A request from the Medical Review Panel for additional information.
  - c) The Medical Review Panel’s decision regarding an athlete’s request to participate in a gender category that differs from the sex assigned to that athlete at birth. That decision shall be to either:
    - i) Grant the request; or
    - ii) Deny the request.

## Procedures:

### 6 Document Submission

- 6.1 Documents, such as a signed and dated copy of the form in “Appendix A - Statement of Gender Declaration” at the end of this policy, must be submitted via the USA Climbing Member Portal as follows:
  - a) Go to [USA Climbing Member Portal](#)
  - b) Log into the appropriate account
  - c) Select the appropriate member profile
  - d) Select “Documents”
  - e) Select “Add Document”
  - f) Select type of document (Transgender Athlete Participation Documentation) from the drop-down list.
  - g) Upload document
  - h) To add additional documents, repeat steps (e) through (g)
  - i) After documents have been uploaded, send email to the USA Climbing Medical Review Panel at [medicalreview@usaclimbing.org](mailto:medicalreview@usaclimbing.org) notifying the Panel of the submission.

### 7 Official Laboratory Results Submission

- 7.1 To fulfill the requirements set forth in 3.5 and 3.7, requisite reports and documentation, including but not limited to official laboratory reports of the athlete’s testosterone levels (if relevant), must be submitted to the USA Climbing Medical Review Panel as set forth in 6.1 at least four (4) weeks prior to the relevant USA Climbing-sanctioned, International-Track event.
- 7.2 In regard to all test date requirements, the actual test date must be within one week of the requirement (i.e., up to one week before or one week after).
- 7.3 Before an athlete’s first International-Track participation, initial testosterone levels must be measured at the following times.
  - a) For participation through November 30, 2023, the initial testosterone tests are not required, though submission is encouraged.
  - b) For participation starting December 1, 2023, through September 30, 2024, the twelve (12) month and six (6) month initial testosterone tests are not required, though submission is encouraged.
  - c) For participation starting October 1, 2024, all initial testosterone tests are required.

Date of Competition	Twelve (12) month	Six (6) month	Six (6) week
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	test	test	test
<b>Through Nov 30, 2023</b>	Encouraged, Not required	Encouraged, Not required	Encouraged, Not required
<b>Starting Dec 1, 2023 through Sep 30, 2024</b>	Encouraged, Not required	Encouraged, Not required	Required
<b>Starting Oct 1, 2024</b>	Required	Required	Required

- 7.4 If the Medical Review Panel grants the athlete’s request as set forth in Section 5.2(c), the athlete’s ongoing testosterone level must be measured and reported to the Panel six (6) months after the Panel’s grant of the request and every six (6) months thereafter.
- 7.5 If the Medical Review Panel’s grant of the athlete’s request was made in response to a submission prior to October 1, 2024 and the athlete’s submission did not include all three (3) testosterone tests (12-month, 6-month, and 6-week), the athlete must submit all three (3) testosterone tests in order to compete in International-Track competitions that start on or after October 1, 2024.

## 8 TUE Application Submission

- 8.1 The athlete is responsible for submitting all the required documents directly to USADA and/or WADA (as applicable) when applying for a TUE.
- 8.2 In order to obtain a TUE, USADA requires a TUE application form, a written personal statement, documentation from a psychiatrist or psychologist, and a detailed medical history and treatment plan from the treating physician including endocrinology reports, medication history, laboratory reports and surgical reports if applicable. Checklists and detailed information are available here: [USADA TUE](#), [WADA TUE](#).
- 8.3 USA Climbing does not require or request access to such private medical data. The USA Climbing Medical Review Panel will make a reasonable effort to assist the athlete if the athlete submits a written request for such help to the panel at [medicalreview@usaclimbing.org](mailto:medicalreview@usaclimbing.org).

## Review and Grievance/Appeal Processes:

### 9 Medical Review Panel

- 9.1 As set forth in the USA Climbing Medical Review Panel Policy, in the event there is a need for a review of the application and/or adherence to this Policy, a USA Climbing Medical Review Panel will be established to provide guidance to USA Climbing staff and/or any USA Climbing Grievance Policy Hearing Panel regarding decisions related to medical and competition implications.

The Medical Review Panel will consist of USA Climbing's Team physician, one physician representative from USA Climbing's Medical Committee who has the appropriate knowledge and expertise, USA Climbing's Medical Manager and USA Climbing's VP of Sport.

- 9.2 An athlete may be subject to further individual review by the USA Climbing Medical Review Panel if there are concerns or questions regarding course of treatment or adherence to USADA/WADA policies.

### 10 Grievances/Appeals

*Note: the term “appeal” used in this Policy is distinct from the term Appeal defined in the USA Climbing Rulebook for challenges to field-of-play decisions.*

- 10.1 Grievances/Appeals - General

The [USA Climbing Grievance Policy](#), as administered by the USA Climbing Judicial Committee, sets forth several kinds of grievances/appeals that may be filed with USA Climbing. A USA Climbing member may submit a grievance/appeal by way of the Grievance Policy if, for example, they believe USA Climbing, including but not limited to the USA

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Climbing Medical Review Panel, has not adhered to USA Climbing Bylaws, Rules, and Policies, including the Transgender Athlete Participation Policy.

### 10.2 Grievances/Appeals – Member Non-Adherence to Transgender Athlete Participation Policy

If one USA Climbing member believes that a second USA Climbing member has not adhered to the Transgender Athlete Participation Policy, the first member may submit a grievance/appeal by way of the [USA Climbing Grievance Policy](#) and/or may submit a grievance/appeal to the USA Climbing Medical Review Panel at [medicalreview@usaclimbing.org](mailto:medicalreview@usaclimbing.org). Note that grievances/appeals by way of the Grievance Policy may result in consultation of, or referral to, the USA Climbing Medical Review Panel; likewise, grievances/appeals to the USA Climbing Medical Review Panel may result in consultation of, or referral to, the Judicial Committee.

### 10.3 Grievances/Appeals – Member Gender Inclusion and Anti-Discrimination

A grievance/appeal regarding violations of USA Climbing's Best Practices for Gender Inclusion Policy, Anti-Discrimination Policy, or other policies (where examples include, but are not limited to, threatening to withhold athletic opportunity, or harassment of any individual on the basis of gender identity or expression, or a breach of medical confidentiality) should be sent to USA Climbing by way of the [USA Climbing Grievance Policy](#) and are subject to disciplinary action.

A USA Climbing member who is aware of conduct that violates USA Climbing policy should submit a grievance/appeal (as noted in the prior paragraph) or otherwise report the conduct to [judicial@usaclimbing.org](mailto:judicial@usaclimbing.org). Such reports will be treated as confidential and may be submitted anonymously.

## External References:

- [USA Climbing Rulebook](#)
- [USA Climbing Policies](#)
  - [USA Climbing Judicial Grievance Policy](#)
  - [USA Climbing Medical Review Panel Policy](#)
- [USA Climbing DEI Committee Best Practices for Gender Inclusion](#)
- [The World Professional Association for Transgender Health Standards of Care](#)
- [USADA TUE Information](#)
- [USADA TUE Application](#)
- [Q&A on Transgender Athletes and USADA](#)
- [WADA Transgender and Gender Diverse Athletes and Anti-Doping](#)
- [WADA International Standards](#)
- [WADA TUE Physician Guidelines](#)
- [IFSC Rulebook](#)
- [IFSC Transgender Policy](#)
- [IFSC Anti-Doping Rules and Regulations](#)
- [IOC Framework on Fairness, Inclusion, and Non-Discrimination on the Basis of Gender Identity and Sex Variants](#)

# USA Climbing Policy – Transgender Athlete Participation

## Approvals / Dates:

<b>Approved</b>	USA Climbing CEO and Board of Directors 2023-09-26
<b>Effective</b>	2023-09-26
<b>Review</b>	yearly

## Revision History:

<b>Date/Version</b>	<b>Changes</b>
20230926	Initial version

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## Appendix A - Statement of Gender Declaration form

This Statement of Gender Declaration form is to be completed, signed, and dated by the athlete, and by the athlete's legal guardian if the athlete is younger than 18 years of age.

A picture or scan of the completed page must be submitted to the USA Climbing Medical Review Panel as set forth in Section 6 of this Policy.

Preferred name: \_\_\_\_\_

Gender Declaration for USA

Climbing purposes: female / male (circle one)

Date of Birth \_\_\_\_/\_\_\_\_/\_\_\_\_ (mm/dd/yyyy)

Sex assigned at birth: female / male (circle one)

If the athlete has a prior USA Climbing membership

Prior USA Climbing membership  
name: \_\_\_\_\_ (if any)

Prior USA Climbing membership  
number: \_\_\_\_\_ (not required)

If the athlete has previously submitted a statement of gender declaration

Date of most recently submitted  
statement: \_\_\_\_/\_\_\_\_/\_\_\_\_ (mm/dd/yyyy)

Athlete Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Today's date: \_\_\_\_/\_\_\_\_/\_\_\_\_ (mm/dd/yyyy)

If the athlete is a minor

Legal Guardian Signature \_\_\_\_\_

Printed Name: \_\_\_\_\_

Today's date: \_\_\_\_/\_\_\_\_/\_\_\_\_ (mm/dd/yyyy)