

CONCERNED WOMEN *for* AMERICA

November 25, 2025

TO: U.S. Department of Health and Human Services, Administration for Children and Families

RE: Placement and Transfer of Unaccompanied [Alien] Children into ORR Care Provider Facilities, OMB #: 0970-0554

Concerned Women for America (CWA) strongly supports the proposed changes concerning sex-based terminology for Administration for Children and Families [Placement and Transfer of Unaccompanied \[Alien\] Children into ORR Care Provider Facilities](#) [OMB #: 0970-0554]. The global terminology update seeks to respect the biological differences of men and women created male and female which are central to clarity in law and regulations and to protecting the dignity and privacy of individuals.

When the characteristic of sex is implicated, federal law and policy must be accurate regarding the immutable binary classification of sex as objectively and genetically determined, not conflating or overruling it with a preferred, self-identification claim of “gender” or “gender identity.”

CWA applauds the Trump Administration for taking seriously our call to uphold the unique dignity of women as expressed in CWA Legislative Action Committee’s Presidential Promise to American Women which was signed by Donald J. Trump. It states:

As President of the United States, I promise to uphold the truth that women are exclusively female. Only women can be pregnant and bear children. Only women can be mothers.

Under my Administration, the status and dignity of women and girls will not be compromised in law or policy.

That sex is binary is a scientific reality, and all federal agencies will be directed to uphold this fact in every policy and program at home and abroad. A persons’ claim of “gender identity” does not overrule their sex.

My Administration will focus on affirming sex-based distinctions that protect women in every area, such as shelters, prisons, housing, healthcare, defense, education, and sports.

I will protect the dignity of women and motherhood in all circumstances.

<https://concernedwomen.org/wp-content/uploads/2023/07/CWA-Presidential-Promise-to-American-Women.pdf>

The Office of Refugee Resettlement proposed changes seek the important objective of restoring and maintaining the undisputable distinction between the male and female sex as an enduring binary differentiation. Such clarity is essential for upholding truth and accuracy in implementing programs requiring identification, documentation, treatment, procedures, or enforcement, and ensuring consistency, uniformity and relevance in research, information and data collection, and analysis. Fabricated terminology associated with gender ideology, which is subjectively defined, unbounded, prone to exploitation, and compromises legal protection based on sex, must be corrected across government and put to a stop.

Concerned Women for America urges this global terminology update to be finalized to accomplish its full, intended purpose as swiftly as possible.

Thank you.