



Submitted electronically

September 26, 2025

Office of the Secretary
Federal Trade Commission
600 Pennsylvania Avenue, NW, Suite CC-5610
Washington, DC 20580

To Whom It May Concern:

On behalf of the United States Conference of Catholic Bishops (USCCB), we respectfully submit the following comments in response to the Federal Trade Commission's request for information regarding false or unsupported claims about "gender-affirming care" (GAC), especially as it relates to minors and potential consumer harms.¹

First, the drugs typically used for GAC have not been approved by the Food and Drug Administration for that use.² While the promotion of an off-label use of a drug is not *per se* misleading or deceptive, the off-label nature of that use is certainly probative. The FTC has repeatedly treated advertisements that go beyond an FDA-cleared or -approved indication, or that imply FDA approval that does not exist, as deceptive.³ For its part, Planned Parenthood publicly promotes "gender-affirming care" as a "life saving service" through its website, social media, ads, and Promotorx Program.⁴

This off-label status is consistent with the weak and increasingly questioned scientific evidence used to support GAC.⁵ This further underscores the need for FTC scrutiny of

¹ Although the USCCB rejects the idea of "gender affirming care" as an accurate description of the therapies at issue here, this brief uses the phrase as a term of art referring to a treatment intended to modify the body to mimic the individual's conception of his or her sex.

² Maya Goldman, "How the FDA Could Boost Gender-Affirming Care," December 15, 2023, available at <https://www.axios.com/2023/12/15/fda-transgender-hormone-therapy-gender-affirming-care> ("For years, transgender patients have received hormone therapies 'off label' — a common medical practice in which doctors prescribe treatments for a use the agency hasn't approved.").

³ See, e.g., <https://www.ftc.gov/news-events/news/press-releases/2020/03/marketers-pain-relief-device-settle-ftc-false-advertising-complaint>; <https://www.ftc.gov/news-events/news/press-releases/2014/10/ftc-charges-gerber-falsely-advertising-its-good-start-gentle-formula-protects-infants-developing>; <https://www.ftc.gov/news-events/news/press-releases/2010/09/ftc-complaint-charges-deceptive-advertising-pom-wonderful>; <https://www.ftc.gov/news-events/news/press-releases/2010/07/dietary-supplement-maker-pay-55-million-settle-ftc-false-advertising-charges>.

⁴ Planned Parenthood of the Pacific Southwest, "Celebrating 5 Years of Providing Gender-Affirming Care Services," February 7, 2024, accessible at <https://www.plannedparenthood.org/planned-parenthood-pacific-southwest/blog/celebrating-5-years-of-providing-gender-affirming-care-services>.

⁵ Department of Health and Human Services, Treatment for Pediatric Dysphoria: Review of Evidence and Best Practices, May 1, 2025, accessible at <https://opa.hhs.gov/sites/default/files/2025-05/gender-dysphoria-report.pdf>; McDeavitt, K., Cohn, J. & Kulatunga-Moruzi, C. Pediatric Gender Affirming Care is Not Evidence-based. *Curr Sex Health Rep* 17, 12 (2025). <https://doi.org/10.1007/s11930-025-00404-w>; Cass, H.,



promotional claims related to drugs for GAC, especially given its own guidance stating that “[a]s a general rule...claims about the health benefits or safety of ...drugs[] and other health-related products require substantiation in the form of competent and reliable scientific evidence.”⁶

Second, while the FTC’s request for information likely anticipates descriptions of physical and psychological harms, it is important to also recognize the spiritual dimension of such interventions. Indeed, the spiritual harm wrought by GAC is no less real and even more profound.

Rejection of our God-given bodies, such as by modifying them to appear as the opposite sex, is a grave matter, and when done with full knowledge and complete consent, is a grave sin.⁷ The Catechism of the Catholic Church, which sets out the fundamental truths of the Catholic faith, teaches that “[g]rave sin deprives us of communion with God and therefore makes us incapable of eternal life, the privation of which is called the ‘eternal punishment’ of sin.”⁸ Grave sin damages the soul, turning the soul away from God and toward further sin.⁹ The Church is also deeply concerned for the spiritual welfare of the medical professionals who administer these drugs and procedures, as their participation likewise involves grave moral consequences.

“Independent review of gender identity services for children and young people: Final report,” April 2024, accessible at <https://cass.independent-review.uk/home/publications/final-report/>.

⁶ Federal Trade Commission, Health Products Compliance Guidance, December 2022, available at https://www.ftc.gov/business-guidance/resources/health-products-compliance-guidance#_ednref3.

⁷ *Dignitas infinita*, 60 (“[A]ny sex-change intervention, as a rule, risks threatening the unique dignity the person has received from the moment of conception”); Catechism of the Catholic Church, § 2297 (“Except when performed for strictly therapeutic medical reasons, directly intended amputations, mutilations, and sterilizations performed on innocent persons are against the moral law”); CCC, § 364 (“The human body shares in the dignity of ‘the image of God’: it is a human body precisely because it is animated by a spiritual soul, and it is the whole human person that is intended to become, in the body of Christ, a temple of the Spirit: ‘Man, though made of body and soul, is a unity. Through his very bodily condition he sums up in himself the elements of the material world. Through him they are thus brought to their highest perfection and can raise their voice in praise freely given to the Creator. For this reason man may not despise his bodily life. Rather he is obliged to regard his body as good and to hold it in honor since God has created it and will raise it up on the last day.’”).

⁸ CCC, § 1472; St. Thomas Aquinas, *Summa Theologiae*, I-II:50 (“[T]he second good of nature, viz. the natural inclination to virtue, is diminished by sin. Because human acts produce an inclination to like acts, as stated above. Now from the very fact that thing becomes inclined to one of two contraries, its inclination to the other contrary must needs be diminished. Wherefore as sin is opposed to virtue, from the very fact that a man sins, there results a diminution of that good of nature, which is the inclination to virtue.”).

⁹ *Summa Theologiae*, I-II:50 (“[The] four wounds [of ignorance, malice, weakness, are concupiscence] are also the result of other sins, in so far as, through sin, the reason is obscured, especially in practical matters, the will hardened to evil, good actions become more difficult and concupiscence more impetuous.”).



Furthermore, interventions that alter the body to reject one's sex attempt to compromise the integrity of the body-soul unity and are thus damaging to the soul because they disregard the fundamental order of the human person, viewing the body as "an object, a mere tool at the disposal of the soul, one that each person may dispose of according to his or her own will..."¹⁰ It must be remembered that "Because of this order and [its unitive and procreative] finality, neither patients nor physicians nor researchers nor any other persons have unlimited rights over the body; they must respect the order and finality inscribed in the embodied person."¹¹

While the spiritual harms of GAC can be healed through reconciliation and grace,¹² physical and psychological harms often persist. Therefore, the FTC should put an end to the marketing of interventions and procedures that do not heal but rather harm, across multiple dimensions.

Respectfully submitted,

William Quinn
General Counsel

Daniel Balserak
Assistant General Counsel

¹⁰ USCCB Committee on Doctrine, "Doctrinal Note on the Moral Limits to Technological Manipulation of the Human Body," March 20, 2023, 5, accessible at <https://www.usccb.org/resources/Doctrinal%20Note%202023-03-20.pdf>.

¹¹ Ibid.

¹² Rom. 8:25 ("We know that all things work for good for those who love God, who are called according to his purpose.")