

USAID Gender Policy Comment – Due Tuesday, September 6, 5:00 pm.

https://www.usaid.gov/gender/genderpolicy?utm_medium=email&utm_source=govdelivery

“General Comments”

The mission of USAID is to “advance a free, peaceful, and prosperous world” through “international development and disaster assistance,” with the end goal of “[saving] lives, reduc[ing] poverty, strengthen[ing] democratic governance, and help[ing] people emerge from humanitarian crises and progress beyond assistance.” This mission is grounded in universal goals that can hardly be pigeonholed as narrow or ideological. Packaging our foreign aid in the language and ideology of radical gender theory, however, does precisely the opposite. It seeks to export a tendentious and quite recent ideological fixation of a powerful special interest in the highly developed world, especially in the northern hemisphere. Gender ideology is offensive to many of the peoples and cultures that our aid programming is intended to assist.

Putting such ideological shackles on our aid efforts undermines the goodwill that our assistance would otherwise garner for the United States. It perpetuates the notion that Americans consider other cultures to be morally inferior, and that our aid should be used to “improve” their cultures. This is naked ideological colonialism.

Certainly a “gender equality and women’s empowerment” policy should seek to empower women and girls and ensure that they have equal opportunities and freedom to exercise their rights relative to men and boys. But the 2022 USAID gender policy instead emphasizes the idea of “**gender equity**,” which it defines as “the process of ensuring women and men, boys and girls, and gender diverse individuals receive consistent, systematic, fair, and just treatment and distribution of benefits and resources.” (p. 37)

USAID goes on in its definition of gender equity to call for measures “to compensate for historic and systemic disadvantages (i.e., economic, social, and political).” This is a far cry from equality. And while the new USAID policy asserts that “gender equity is the process that needs to be followed to reach the outcome of *gender equality*,” (p. 37), this is neither a proper nor achievable goal for the U.S. government. No amount of foreign assistance or programming will yield perfectly equal outcomes for any groups or individuals in other countries.

Instead, USAID ought to return to the definition “gender equality” that it employed in its previous gender document of 2020: “The state in which women, girls, men, and boys have equal access to opportunities, resources, benefits, and legal protections, and which recognizes their equal, inherent human dignity, worth and unalienable rights.”

Furthermore, in this new policy, USAID departs from a perennial, common sense and science-based understanding of sex, and from the common use “gender” as synonymous with biological

sex. Many of the terms included in *Annex I: Definitions* are controversial and nebulous. USAID even acknowledges this when it says that it proceeds “with the understanding that language is dynamic and evolving.” (p. 36) Terms such as “gender,” “gender binary,” “gender diverse,” and “gender identity” do not seem to refer to anything beyond a subjective feeling given or informed by an artificial label.

No doubt many who would be labeled “cisgender” are unaware of the label and would reject it as an absurdity if they were aware of it, especially in aid recipient countries. For example, the vast majority of women in African countries would say that they are “women,” without question. This is not the same as saying that these women “identify” with their “sex assigned at birth.” This is particularly tone-deaf on the part of the U.S. government in its dealings with countries that do not share the current administration’s progressive worldview.

Not only is this language insensitive to other cultures, barely disguising an ideological agenda, but it is also nonsensical. There is no neutral empirical way to discern a gender identity. It is entirely subjective. As a concept, “gender identity” is an artifact of gender theory, not history or science. It should not be governing our foreign policy or aid programming.

Gender theory is neither an appeal to universal truths nor to negotiated principles adopted by consensus. The use of language about “systems of oppression and/or discrimination” and “systemic privilege and access,” (p.6) exemplifies a radical progressive ideology that is inconsistent with America’s founding principles. The USAID gender policy specifically references the idea of “intersectionality,” which is “rooted in feminist legal scholarship.” The “analytical lens” of intersectionality will amplify the effects of oppression if the “oppressed” status of two or more combined “social identities” is greater than their mere sum. (p. 38)

The policy’s consistent use of the phrase “**women and girls in all their diversity**” essentially stretches the definition of “women and girls” to the point of including anyone, even men and boys. By defining that term to include “the full range of gender identity and/or gender expression, sex characteristics, sexual orientation, and other intersectional characteristics,” it prevents a USAID program from focusing on needs or conditions that are particular to women and girls. For example, a man who may claim to “identify” as a woman does not have the same needs or challenges as a woman—a biological female—in the context of menstrual health and hygiene. A USAID grant or program ought to recognize and address that reality.

The emphasis on “gender-transformative education” in the *Global Snapshots* section is another example of overt ideological imperialism. According to the document, “UNICEF defines gender-transformative education as the education system that seeks to transform stereotypes, attitudes, norms, and practices by challenging power relations, rethinking gender norms and binaries, and raising critical consciousness about the root causes of inequality and systems of oppression.” While the new gender policy document holds this type of education up as an opportunity worthy of USAID support, the idea of changing cultural attitudes and raising

awareness of oppression will not be well received by traditional cultures or religious groups seeking better education for their children in reading, writing, and mathematics.

“Sections or Statements that you strongly support and feel are essential for the USAID Gender Policy”

The following sections of the USAID gender policy are important and worthy of support: attention to nutrition, and to the particular importance of breastfeeding for an infant’s first six months (p. 18); land and property rights (p. 32); and water security, sanitation and hygiene (p. 33).

“Major gaps and inaccuracies”

The entire concept of gender identity, and gender theory itself, is rife with gaps and inaccuracies, as described above.

Additionally, the lack of attention to mothers and motherhood is a glaring omission in a document that purports to be concerned with women and girls. Millions of women who benefit from USAID programs are mothers, and happily so. Motherhood is a defining component of these women’s lives. USAID policy should acknowledge and support the critical contributions that mothers make to a productive and peaceful society.

As USAID well knows, under the Helms Amendment to the United States Foreign Assistance Act, foreign assistance funds may not be used to pay for the performance of abortion as a method of family planning. While the section on global health (p. 29) accurately references the “reproductive rights” defined in the International Conference on Population and Development (ICPD) in 1994, a more complete discussion of ICPD would make note of the fact that it clearly left the regulation of abortion to the member states to determine domestically, and it characterized abortion as something to be avoided. That language stands in stark contrast to the discourse surrounding sexual and reproductive health (SRH) and reproductive rights (RR) today, including from some of the very sources that the new USAID gender policy footnotes, such as the Guttmacher Institute, the Office of the High Commissioner for Human Rights (OHCHR) and the United Nations Population Fund (UNFPA). These entities increasingly include abortion within the umbrella of sexual and reproductive health and rights, and assert that access to so-called “safe abortion” is a requirement of human rights obligations. Given this lack of consensus, the USAID gender policy should clearly and explicitly state that abortion is not healthcare, that access to abortion is not a human right, and that U.S. tax dollars will not be used to promote or perform abortion.