



# CATHOLIC MEDICAL ASSOCIATION

*Upholding the Principles of the Catholic Faith in the Science and Practice of Medicine*

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May 10, 2023

The Honorable Miguel Cardona, Secretary of Education  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

Dear Mr. Secretary:

On behalf of the Catholic Medical Association, I request your attention to concerns regarding the Education Department's recent NPRM, "Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance: Sex-Related Eligibility Criteria for Male and Female Athletes" (88 FR 22860).

There are many troubling points within this proposed rule, including the vague and confusing discussion of its implementation, financing, and potential impact. In addition, the lack of consistency with prior Title IX rules is evident and poorly delineated. These and many other issues will be submitted with comments by our organization and members.

The most urgent concern is the inordinately short comment period allowed for this NPRM. Whereas other recent NPRM postings by various Federal departments have allowed 60 to 90 day comment periods, your Department's allowance of only 32 days is extremely limited. This issue is of great concern and importance, requiring considerable time for a cogent response. An extension of the deadline for comment from its current date of May 15 is warranted. This consideration and discussion are not benefited by an expeditious approach.

We ask that the deadline for comments for this NPRM be extended for at least another 30 days. Please contact our offices with any questions you may have.

Sincerely,

Craig L. Treptow, M.D.  
*President*