CONVERSION THERAPY AND LGBT YOUTH

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EXECUTIVE SUMMARY

Conversion therapy is treatment grounded in the belief that being LGBT is abnormal. It is intended to change the sexual orientation, gender identity, or gender expression of LGBT people.[1] Conversion therapy is practiced by some licensed professionals in the context of providing health care and by some clergy or other spiritual advisors in the context of religious practice.[2] Efforts to change someone's sexual orientation or gender identity are associated with poor mental health,[3] including suicidality.[4] To date, nine states, the District of Columbia, and 32 localities have banned health care professionals from using conversion therapy on youth.

The Williams Institute estimates that:

- 698,000 LGBT adults (ages 18-59)[5] in the U.S. have received conversion therapy, including about 350,000 LGBT adults who received treatment as adolescents.[6]
- 20,000 LGBT youth (ages 13-17) will receive conversion therapy from a licensed health care professional before they reach the age of 18 in the 41 states that currently do not ban the practice.[7]
- 6,000 LGBT youth (ages 13-17) who live in states that ban conversion therapy would have received such therapy from a licensed health care professional before age 18 if their state had not banned the practice.[8]
- 57,000 youth (ages 13-17) across all states will receive conversion therapy from religious or spiritual advisors before they reach the age of 18.[9]

HISTORY

Conversion therapy has been practiced in the U.S. for over a century. Academic literature has documented instances of conversion therapy being used as early as the 1890s and continuing through the present day.[10] Throughout the history of conversion therapy, a range of techniques have been used by both health care professionals and religious figures seeking to change people's sexual orientation or gender identity. Currently, talk therapy is the most commonly used therapy technique.[11] Some practitioners have also used "aversion treatments, such as inducing nausea, vomiting, or paralysis; providing electric shocks; or having the individual snap an elastic band around the wrist when the individual became aroused to same-sex erotic images or thoughts."[12] Other practitioners have used non-aversive techniques such as attempting to "change

thought patterns by reframing desires, redirecting thoughts, or using hypnosis."[13]

An estimated 698,000 LGBT adults in the U.S have received conversion therapy either from a licensed professional or a religious advisor or from both at some point in their lives,[14] including about 350,000 LGBT adults who received conversion therapy as adolescents.[15]

CURRENT PERSPECTIVES

Professional Health Associations

A number of prominent national professional health associations—including the American Medical Association, the American Psychological Association, and the American Academy of Pediatrics, among others—have issued public statements opposing the use of conversion therapy because it is harmful and ineffective.[16] Several of these associations have called on Congress and state legislatures to pass laws that ban conversion therapy. For example, the CEO of the American Counseling Association (ACA) submitted testimony to the Illinois House and Senate in support of the state's conversion therapy ban bill in 2015.[17] In addition, ACA members sent 79 letters to the Governor and 84 letters to state legislators in support of the bill.[18] Also, several professional health associations have endorsed the Therapeutic Fraud Prevention Act, a federal bill that would prohibit the practice of conversion therapy, including the National Association of School Psychologists, the American Psychoanalytic Association, the American Counseling Association, and the American Academy of Pediatrics.[19]

Public Opinion

Three recent public opinion polls found majority support for ending the use of conversion therapy on youth. A 2017 Gravis Marketing poll found that 71% of Florida residents believed that the use of conversion therapy on youth should be illegal.[20] A 2016 Gravis Marketing poll similarly found that 64% of Virginia residents believed that the use of conversion therapy on youth should be illegal.[21] Another 2016 poll conducted by the Center for Civil Policy similarly found that 60% of New Mexico respondents supported a legal ban on the use of conversion therapy on youth.[22] Polling also indicates that many people do not think conversion therapy is effective; only 8% of respondents to a 2014 national poll said they thought conversion therapy could change a person's sexual orientation from gay to straight.[23]

CURRENT LAWS

Conversion Therapy by Licensed Health Care Professionals

As of January 2018, nine states and the District of Columbia had passed statutes limiting the use of conversion therapy: California, Connecticut, D.C., Illinois, Nevada, New Jersey, New Mexico, Oregon, Rhode Island, and Vermont.[24] The laws protect youth under age 18 from receiving conversion therapy from licensed mental health care[25] providers and, in some states, other individuals who perform conversion therapy services in exchange for payment.[26] California was the first state to pass a conversion therapy ban in

2012.[27] Four states—Connecticut, Nevada, New Mexico, and Rhode Island—passed bans in 2017.[28] While more limited in reach than the statutory bans, a gubernatorial executive order in New York prohibits the state's Medicaid program and private health insurers from providing coverage for conversion therapy on youth and prohibits facilities under the State Division of Mental Health from performing conversion therapy on youth.[29] In addition, 32 localities in states without statewide bans have passed bans at the local level,[30] over half (19) of these localities are in Florida.[31]

All of the state statutory bans allow licensing entities to discipline health care providers who use conversion therapy on youth under age 18.[32] Under Connecticut and Illinois laws, the use of conversion therapy on youth is also considered an unfair business practice and the laws allow for enforcement and penalties consistent with other state laws against such practices.[33] In addition, in 2015, a New Jersey court held that providing conversion therapy in exchange for payment constitutes a fraudulent business practice, regardless of whether it is used on youth or adults.[34]

An estimated 20,000 LGBT youth (ages 13-17) will receive conversion therapy from a licensed health care professional before they reach the age of 18 in the 41 states that currently do not ban the practice, unless additional states pass conversion therapy bans.[35] An estimated 6,000 LGBT youth (ages 13-17) who live in states with conversion therapy bans would have received such therapy from a licensed health care professional before age 18 if their state had not banned the practice.[36]

More states are expected to consider conversion therapy bans in 2018.[37] In addition, members of Congress have introduced federal legislation aimed at ending conversion therapy. The Therapeutic Fraud Prevention Act,[38] introduced in both the House and Senate in 2017, would classify conversion therapy provided in exchange for payment as a form of consumer fraud.[39] The law would allow state attorneys general and the Federal Trade Commission to bring enforcement actions against individuals who are providing conversion therapy for payment or advertising such services.[40]

Conversion Therapy by Religious and Spiritual Advisors

The state statutory conversion therapy bans apply to licensed mental health care providers and sometimes to any others who seek to provide conversion therapy in exchange for payment.[41] The laws generally do not apply to religious or spiritual advisors who engage in sexual orientation or gender identity change efforts within their pastoral or religious capacity. In most states with bans (California, D.C., Nevada, New Mexico, Oregon, Rhode Island, and Vermont[42]), this means that any individuals (including licensed professionals) may engage in conversion therapy as long as they are acting as clergy or religious counselors and they do not hold themselves out as acting pursuant to a professional license. In states with bans on providing conversion therapy in exchange for payment (Connecticut, Illinois, and New Jersey[43]), religious or spiritual advisors acting in a pastoral or religious capacity may continue to provide conversion therapy as long as they are not acting pursuant to a professional license and they do not accept payment for their services.

These exclusions for therapy provided by religious or spiritual advisors leave many youth vulnerable to conversion counseling even in states with bans. An estimated 57,000 youth (ages 13-17) across all states will receive conversion therapy from religious or spiritual advisors before they reach the age of 18.[44]

CONCLUSION

Conversion therapy continues to be used in the U.S. despite support for ending the practice among prominent medical and mental health associations and the public. An estimated 698,000 LGBT adults in the U.S. have received treatment to change their sexual orientation or gender identity at some point in their lives, including about 350,000 who received treatment as adolescents. As of January 2018, nine states, the District of Columbia, and 32 localities had enacted laws banning licensed professionals from using conversion therapy on youth. An estimated 20,000 LGBT youth will receive conversion therapy from a licensed professional before they reach the age of 18 in the 41 states that currently do not ban the practice. In addition, an estimated 57,000 LGBT youth across all states will receive conversion therapy from religious or spiritual advisors. Because of the large number of youth who may be vulnerable to conversion therapy, individuals who have contact with minors should be aware that the American Psychological Association has issued a resolution "advising parents, guardians, young people, and their families to avoid sexual orientation change efforts that portray homosexuality as a mental illness or developmental disorder and to seek psychotherapy, social support and educational services that provide accurate information on sexual orientation and sexuality, increase family and school support, and reduce rejection of sexual minority youth[.][45]"

ABOUT THE WILLIAMS INSTITUTE

The Williams Institute on Sexual Orientation and Gender Identity Law and Public Policy at UCLA School of Law advances law and public policy through rigorous, independent research and scholarship, and disseminates its work through a variety of education programs and media to judges, legislators, lawyers, other policymakers and the public. These studies can be accessed at the Williams Institute website.

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ENDNOTES

[1] JUDITH M. GLASSGOLD ET AL., AM. PSYCH. ASSOC., REPORT OF THE AM. PSYCH. ASSOC. TASK FORCE ON APPROPRIATE THERAPEUTIC RESPONSES TO SEXUAL ORIENTATION 22 (2009).

[2] Susan L. Morrow & A. Lee Beckstead, *Conversion Therapies for Same-Sex Attracted Clients in Religious Conflict: Context, Predisposing Factors, Experiences, and Implications for Therapy*, 32 COUNSELING PSYCHOLOGIST 641, 642 (2004).

[3] *E.g.*, Annesa Flentje, Nicholas C. Heck & Bryan N. Cochran, *Sexual Reorientation Therapy Interventions: Perspectives of Ex-Ex-Gay Individuals*, 17 J. GAY & LESBIAN MENTAL HEALTH 256 (2013); Elizabeth M. Weiss et al., *A Qualitative Study of Ex-Gay and Ex-Ex-Gay Experiences*, 14 J. GAY & LESBIAN MENTAL HEALTH 291 (2010); Ariel Shidlo & Michael Schroeder, *Changing Sexual Orientation: A Consumer's Report*, 33 PROF. PSYCH.: RESEARCH & PRACTICE 249 (2002).

[4] SANDY E. JAMES ET AL., NAT'L CTR. FOR TRANSGENDER EQUALITY, THE REPORT OF THE 2015 U.S. TRANSGENDER SURVEY (2016).

[5] 698,000 US LGBT adults ages 18 to 59 are estimated to have received treatment to change their sexual orientation or gender identity [range 572,000 to 857,000]. This figure was calculated by adding estimates for LGB and transgender adults. In order to determine an estimate for the number of LGB adults who have received conversion therapy, we started with the proportion of LGB adults ages 18 to 59 who report having received treatment to change their sexual orientation (6.7%) from the Generations Study, a national probability study of LGB individuals supported by the Eunice Kennedy Shriver National Institute of Child Health & Human Development of the National Institutes of Health under Award Number R01HD078526 (Ilan H. Meyer, PI). The content is solely the responsibility of the authors and does not necessarily represent the official views of the National Institutes of Health. The proportion who received conversion therapy, across three age cohorts (18-25, 34-41, and 52-59), where receipt of conversion therapy did not statistically significantly differ across these age cohorts, is assumed to be consistent for those ages 26 to 33 and 42 to 51 (Williams Institute unpublished analyses). That proportion was then multiplied by the proportion of adults ages 18 to 59 who identify as LGBT (5.29%) in the 2015-2017 Gallup Daily Tracking Survey (Williams Institute unpublished analyses) and the proportion of LGBT individuals ages 18 to 59 who are cisgender (87.7%) among LGBT-identified respondents to the 2014-2015 BRFSS (Williams Institute unpublished analyses), and then applied to the number of adults ages 18 to 59 in the U.S. (180,757,997), according to 2016 population estimates from the 2010 U.S. Census. For total 18-59 population estimates: search American FactFinder, (last visited Dec. 15, 2017) (select advanced search, enter "Annual Estimates of the Resident Population by Single Year of Age and Sex for the United States, States, and Puerto Rico Commonwealth: April 1, 2010 to July 1, 2016" under topic or table name, and select "Annual Estimates of the Resident Population by Single Year of Age and Sex for the United States, States, and Puerto Rico Commonwealth: April 1, 2010 to July 1, 2016" 2016 Population Estimates). The same steps were followed with 95% confidence intervals to calculate a range for each estimate.

In order to determine an estimate for the number of transgender adults who have received conversion therapy, we started with the proportion of transgender adults who report that one or more professionals tried to make them identify only with their sex assigned at birth or try to stop them from being transgender (13.0%), as observed in the U.S. Transgender Survey—the largest purposive sample study of transgender adults to date and reported in JAMES ET AL., *supra* note 4. The proportion who received conversion therapy was multiplied by the proportion of adults ages 18 and older who are estimated to be transgender (0.58%) and then applied to the number of adults ages 18 to 59 in the U.S. (180,757,997). This estimate is likely to be somewhat conservative given that slightly larger proportions of the population identify as transgender among younger age cohorts. For transgender population estimates see ANDREW R. FLORES ET AL., THE WILLIAMS INSTITUTE, HOW MANY ADULTS IDENTIFY AS TRANSGENDER IN THE UNITED STATES? (2016).

[6] Among adults who have received conversion therapy, approximately 49.9% of LGB adults in the Generations Study and 51% of transgender adults in the U.S. Trans Survey are estimated to have received treatment at or before the age of 18. These proportions are applied to the number of LGB and transgender adults ages 18 to 59 who are estimated to have received conversion therapy, as described above. Thus, we estimate that 350,000 LGBT adults [range 287,000 to 429,000] received treatment as adolescents. We believe that our estimate of conversion therapy among cisgender LGB adolescents is, if anything, an underestimate because the Generations Study survey asked about age at which last conversion therapy was received versus the age at which conversion therapy first began. It is possible that some youth received conversion therapy that did not end until age 18 or later and that these individuals are missing in our estimates of the percentage of LGB youth who received conversion therapy. This would lead to an underestimate of the number of current LGB youth currently at risk of conversion therapy.

[7] 20,000 LGBT youth ages 13 to 17 [range 13,000 to 32,000] are estimated to live in states without state-wide conversion therapy bans and will receive conversion therapy from a professional before the age of 18. This figure was calculated by adding estimates for LGB and transgender youth. In order to determine an estimate for the number of LGB youth who will receive conversion therapy before age 18, we multiplied the proportion of LGB adults ages 18 to 59 who report having received treatment from a health care professional to change their sexual orientation that began and ended before the age of 18 (1.2%) from the Generations Study (Williams Institute unpublished analyses) by the proportion of youth in grades 9 through 12 who identify as LGB (8.0%) in the 2015 YRBS and by the proportion of LGB young adults ages 18 to 24 who are cisgender (95.7%) among LGB-identified respondents to the 2014-2015 BRFSS

(Williams Institute unpublished analyses), and then applied this proportion to the number of youth ages 13 to 17 in the U.S. (20,870,650), according to 2016 population estimates from the 2010 U.S. Census. For total 13-17 population estimates: search American FactFinder, (last visited Dec. 15, 2017) (select advanced search, enter "Annual Estimates of the Resident Population by Single Year of Age and Sex for the United States, States, and Puerto Rico Commonwealth: April 1, 2010 to July 1, 2016" under topic or table name, and select "Annual Estimates of the Resident Population by Single Year of Age and Sex for the United States, States, and Puerto Rico Commonwealth: April 1, 2010 to July 1, 2016" 2016 Population Estimates). For estimates of the proportion of youth who identify as lesbian, gay, or bisexual see LAURA KANN ET AL., SEXUAL IDENTITY, SEX OF SEXUAL CONTACTS, AND HEALTH-RELATED BEHAVIORS AMONG STUDENTS IN GRADES 9-12 – UNITED STATES AND SELECTED SITES, 2015 (2016). Note: The proportion who received conversion therapy from a health care professional to change their sexual orientation that began and ended before the age of 18, was not significantly different across the three age cohorts (18-25, 34-41, and 52-59) where receipt of conversion therapy is assumed to be consistent for those ages 26 to 33 and 42 to 51 (Williams Institute unpublished analyses).

In order to determine an estimate for the number of transgender youth who have received conversion therapy we multiplied the proportion of transgender adults who report that a professional (nonreligious or spiritual) tried to make them identify only with their sex assigned at birth or stop them from being transgender (9.0%) by the proportion for whom this had happened at or before age 18 (51%), as observed in the U.S. Transgender Survey and reported in James et al., *supra* note 4. This proportion (4.6%), those who received conversion therapy at or before age 18, was multiplied by the proportion of youth ages 13 to 17 who are estimated to be transgender (0.73%) and then applied to the number of youth ages 13 to 17 in the U.S. (20,870,650). For transgender population proportion estimates see JODY L. HERMAN ET AL., THE WILLIAMS INSTITUTE, AGE OF INDIVIDUALS WHO IDENTIFY AS TRANSGENDER IN THE UNITED STATES (2017).

For a list of the states that have banned conversion therapy state-wide see note 24, *infra*. Although some cities and counties have enacted local bans on conversion therapy, the population of these localities is not large and would not have an appreciable impact on state estimates.

[8] Following the same approach described above, we estimate that approximately 6,000 LGBT youth [range 4,000 to 10,000] live in states that have banned conversion therapy state-wide by licensed professionals.

[9] 57,000 LGBT youth ages 13-17 [range 37,000 to 94,000] are estimated to be at risk of receiving treatment to change their sexual orientation or gender identity from a religious leader, advisor or counselor at or before age 18. This figure was calculated by adding estimates for LGB and transgender youth. In order to determine an estimate for the number of LGB youth who will receive conversion therapy, we multiplied the proportion of LGB adults ages 18 to 25 who report having received treatment from a religious leader (pastor, religious counselor, priest) to change their sexual orientation that began and ended before the age of 18 (3.4%) from the Generations Study (Williams Institute unpublished analyses) by the proportion of youth in grades 9 through 12 who identify as LGB (8.0%) in the 2015 YRBS and by the proportion of LGB young adults ages 18 to 24 who are cisgender (95.7%) in the 2014-2015 BRFSS (Williams Institute unpublished analyses), and then applied this proportion to the number of youth ages 13 to 17 in the U.S. (20,870,650), according to 2016 population estimates from the 2010 U.S. Census. For total 13-17 population estimates: search American FactFinder, (last visited Dec. 15, 2017) (select advanced search, enter "Annual Estimates of the Resident Population by Single Year of Age and Sex for the United States, States, and Puerto Rico Commonwealth: April 1, 2010 to July 1, 2016" under topic or table name, and select "Annual Estimates of the Resident Population by Single Year of Age and Sex for the United States, States, and Puerto Rico Commonwealth: April 1, 2010 to July 1, 2016" 2016 Population Estimates). For estimates of the proportion of youth who identify as lesbian, gay, or bisexual see KANN ET AL., *supra* note 7.

In order to determine an estimate for the number of transgender youth who received conversion therapy from a religious or spiritual counselor/advisor, we multiplied the proportion of transgender adults who report that such a person tried to make them identify only with their sex assigned at birth or stop them from being transgender (4.0%) by the proportion for whom this had happened at or before age 18 (51%), as observed in the U.S. Transgender Survey and reported James et al., *supra* note 4. This proportion (2.0%), those who received conversion therapy at or before age 18, was then multiplied by the proportion of youth ages 13 to 17 who are estimated to be transgender (0.73%) and then applied to the number of youth ages 13 to 17 in the U.S. (20,870,650). For transgender population proportion estimates see HERMAN ET AL., *SUPRA* NOTE 7.

[10] *See, e.g.*, Prince Morton, *Sexual Perversion or Vice? A Pathological and Therapeutic Inquiry*, 25 J. NERVOUS AND MENTAL DISEASES 237 (1898); William Stekel, *Is Homosexuality Curable?* 7 PSYCHOANALYTIC REVIEW 443 (1930); FRANK S. CAPRIO, FEMALE HOMOSEXUALITY: A PSYCHODYNAMICS STUDY OF LESBIANISM 299 (1954); IRVING BIEBER ET AL., HOMOSEXUALITY: A PSYCHOANALYTIC STUDY (1962); Jolande Jacobi, *Case of Homosexuality*, 154 J. ANALYTICAL PSYCHOLOGY 48 (1969); Lee Birk, *The Myth of Classic Homosexuality: Views of a Behavioral Psychotherapist* in HOMOSEXUAL BEHAVIOR 376 (J. Marmor, ed., 1980); Robert L. Sptizer, *Can Gay Men and Lesbians Change Their Sexual Orientation? 200 Participants Reporting a Change from Homosexual to Heterosexual Orientation*, 32 ARCHIVES OF SEXUAL BEHAVIOR 403 (2003).

[11] Nat'l Ctr. for Lesbian Rights, #BornPerfect: The Facts About Conversion Therapy, http://www.nclrights.org/bornperfect-the-facts-about-conversion-therapy/ (last visited Jan. 2, 2018).

[12] GLASSGOLD ET AL., *supra* note 1 at 22.

[13] *Id.* at 24.

[14] For methodology, see note 5, *supra*.

[15] For methodology, see note 6, *supra*.

[16] American professional organizations that have issued statements opposing the use of conversion therapy on youth include: American Academy of Child and Adolescent Psychiatry, American Academy of Pediatrics, American Association for Marriage and Family Therapy, American College of Physicians, American Counseling Association, American Medical Association, American School Health Association, American Psychoanalytic Association, American Psychiatric Association, American Psychological Association, American School Counselor Association, and National Association of Social Workers Stewart L. Adelson, *Practice Parameter on Gay, Lesbian, or Bisexual Sexual Orientation, Gender Nonconformity, and Gender Discordance in Children and Adolescents*, 51 J. AM. ACAD. CHILD & ADOLESCENT PSYCHIATRY 957 (2012); Am. Acad. of Pediatrics, *Homosexuality and Adolescence*, 92 PEDIATRICS 631 (1993); Am. Assoc. for Marriage and Family Therapy, Positions on Couples and Families: Reparative/Conversion Therapy (Mar. 25, 2009), http://www.aamft.org/iMIS15/AAMFT/Content/about_aamft/position_on_couples.aspx; Hilary Daniel & Renee Butkis, *Lesbian, Gay, Bisexual, and Transgender Health Disparities: Executive Summary of a Policy Position Paper from the American College of Physicians*, 163 ANNALS OF INTERNAL MEDICINE 135 (2015); Am. Counseling Assoc., Ethical Issues Related to Conversion or Reparative Therapy (Jan. 16, 2013), https://www.counseling.org/news/updates/2013/01/16/ethical-issues-related-to-conversion-or-reparative-therapy; Am. Med. Assoc., Policies on Lesbian, Gay, Bisexual, Transgender & Queer (LGBTQ) Issues, H-160.991 Health Care Needs of the Homosexual Population, https://www.ama-assn.org/delivering-care/policies-lesbian-gay-bisexual-transgender-queer-lgbtq-issues (last visited Dec. 1, 2017); Am. Psychoanalytic Assoc., Position Statement on Attempts to Change Sexual Orientation, Gender Identity, or Gender Expression (June 2012), *available at* http://www.apsa.org/content/2012-position-statement-attempts-change-sexual-orientation-gender-identity-or-gender; Am. Psychiatric Assoc.; Position Statement on Therapies Focused on Attempts to Change Sexual Orientation (Reparative or Conversion Therapies) (2000); Barry S. Anton, *Proceedings of the Am. Psychological Assoc. for the Legislative Year 2009: Minutes of the Annual Meeting of the Council of Representatives and Minutes of the Meetings of the Board of Directors*, 65 AM. PSYCHOLOGIST 385 (2010); Am. Psychological Assoc., Resolution on Appropriate Affirmative Responses to Sexual Orientation Distress and Change Efforts (2009); Am. School Counselor Assoc., The Professional School Counselor and LGBTQ Youth (revised 2016), *available at* https://www.schoolcounselor.org/asca/media/asca/PositionStatements/PS_LGBTQ.pdf; Nat'l Assoc. of Social Workers, Nat'l Comm. on Lesbian, Gay, Bisexual, and Transgender Issues, Position Statement: Sexual Orientation Change Efforts (SOCE) and Conversion Therapy with Lesbians, Gay Men, Bisexuals, and Transgender Persons (2015), https://www.socialworkers.org/LinkClick.aspx?fileticket=yH3UsGQQmYI%3d&portalid=0;

[17] Press Release, Am. Counseling Assoc., ACA Advocacy Efforts Assist in Prohibiting 'Conversion Therapy' for Minors in Illinois (Aug. 21, 2015), *available at* https://www.counseling.org/news/news-release-archives/by-year/2015/2015/08/21/aca-advocacy-efforts-assist-in-prohibiting-conversion-therapy-for-minors-in-illinois.

[18] *Id.*

[19] Press Release, U.S. Rep. Ted Lieu, Rep. Lieu Introduces the Therapeutic Fraud Prevention Act of 2017, https://lieu.house.gov/media-center/press-releases/rep-lieu-introduces-therapeutic-fraud-prevention-act-2017.

[20] Doug Kaplan, *Political Climate Forecast for Florida in 2018 Looks Positive for John Morgan, Negative for Gay Conversion Therapy, and Uncertain on the Future of American Involvement in Syria*, ORLANDO POLITICAL OBSERVER, Apr. 3, 2017, http://orlando-politics.com/2017/04/13/political-climate-forecast-for-florida-in-2018-looks-positive-for-john-morgan-negative-for-gay-conversion-therapy-and-uncertain-on-the-future-of-american-involvement-in-syria/.

[21] Gravis Marketing, Virginia Election Poll (May 26, 2017), http://www.gravismarketing.com/polling-and-market-research/virginia-election-poll052016/.

[22] Ctr. for Civil Policy, 2017 Landscape Poll (Jan. 15, 2017), https://civicpolicy.com/2017-landscape-poll/.

[23] Peter Moore, Only 8% of Americans Think Gay Conversion Therapy Works, YOUGOV.COM, June 12, 2014, *available at* https://today.yougov.com/news/2014/06/12/gay-conversion-therapy/.

[24] CAL. BUS. & PROF. CODE § 865 (2017); 2017 Conn. Pub. Acts 5 (Reg. Sess.); D.C. CODE § 7-1231.14 (2017); 405 ILL. COMP. STAT. 48/1 (2017); S.B. 201, 79th Leg., Reg. Sess. (Nev. 2017); N.J. REV. STAT. § 45:1-54 (2016); S.B. 121, 2017 Leg., Reg. Sess. (N.M. 2017); OR. REV. STAT. §§ 675.070; 675.300; 675.336; 675.540; 675.745 (2016); H. 5277, 2017 Gen. Assem., Reg. Sess. (R.I. 2017); VT. STAT. ANN. tit. 18, § 8351; VT. STAT. ANN. tit. 26, §§ 1354(a), 1842(b), 3016, 3210(a), 3271(a), 4042(a), 4062(a), 4132(a).

[25] Some laws apply to other types of health professionals as well. For example, New Mexico's conversion therapy ban applies to nurses and doctors of osteopathic medicine. S.B. 121, 2017 Leg., Reg. Sess. (N.M. 2017)

[26] See note 24, *supra*.

[27] CAL. BUS. & PROF. CODE § 865.

[28] 2017 Conn. Pub. Acts 5 (Reg. Sess.); S.B. 201, 79th Leg., Reg. Sess. (Nev. 2017); S.B. 121, 2017 Leg., Reg. Sess. (N.M. 2017); H. 5277, 2017 Gen. Assem., Reg. Sess. (R.I. 2017).

[29] Press Release, Gov. Andrew M. Cuomo, Governor Cuomo Announces Executive Actions Banning Coverage of Conversion Therapy (Feb. 6, 2016), *available at* https://www.governor.ny.gov/news/governor-cuomo-announces-executive-actions-banning-coverage-conversion-therapy.

[30] In chronological order of passage: Cincinnati, Ohio; Miami Beach, Florida; Seattle, Washington; Wilton Manors, Florida; Miami, Florida; North Bay Village, Florida; West Palm Beach, Florida; Bay Harbor Islands, Florida; Pittsburgh, Pennsylvania; Lake Worth, Florida; Boynton Beach, Florida; El Portal, Florida; Toledo, Ohio; Key West, Florida; Columbus, Ohio; Tampa, Florida; Delray Beach, Florida; Riviera Beach, Florida; Philadelphia, Pennsylvania; Wellington, Florida; Dayton, Ohio; Allentown, Pennsylvania; Greenacres, Florida; Pima County, Arizona; Athens, Ohio; Oakland Park, Florida; Boca Raton, Florida; New York City, New York; Doylestown, Pennsylvania; Reading, Pennsylvania; Palm Beach County, Florida; and Broward County, Florida. Movement Advancement Project, Conversion Therapy Laws, http://www.lgbtmap.org/equality-maps/conversion_therapy (last visited Dec. 4, 2017); North Bay Village, Fla., Ord. No. 2017-004 (enacted Mar. 14, 2017); DELRAY BEACH, FLA., CODE § 133.02 (2017); John McDonald, *Oakland Park Bans Conversion Therapy*, SOUTHFLORIDAGAYNEW.COM, Oct. 19, 2017, http://southfloridagaynews.com/Local/oakland-park-bans-conversion-therapy.html; Brittany Wallman, *Gay-Conversion Therapy Increasingly Outlawed across South Florida*, SUN-SENTINEL.COM, Oct. 13, 2017, http://www.sun-sentinel.com/local/broward/fl-reg-conversion-therapy-ban-20171012-story.html; Skyler Swisher, *Florida County Bans Therapy to Change Kids' Sexual Orientation*, SUN-SENTINEL.COM, Dec. 19, 2017, http://www.sun-sentinel.com/local/palm-beach/fl-reg-conversion-therapy-finalized-20171219-story.html; Ted Scouten, *Broward Bans Forced Conversion Therapy for Gay, Transgender Children*, MIAMI,CBSLOCAL.COM, Jan. 9, 2018, http://miami.cbslocal.com/2018/01/09/conversion-therapy-transgender-gay-children/.

[31] *Id.*

[32] See note 24, *supra*.

[33] 2017 Conn. Pub. Acts 5 (Reg. Sess.); 405 ILL. COMP. STAT. 48/1 (2017).

[34] Ferguson v. JONAH, No. L-5473-12 (N.J. Sup. Ct. Dec. 18, 2015).

[35] For methodology, see note 7.

[36] For methodology, see note 8.

[37] *E.g.* H.B. 717, 2018 Leg., Reg. Sess. (Fla. 2017); S.B. 270, 29th Leg., Reg. Sess. (Haw. 2017).

[38] H.R. 2119, 115th Cong. (2017); S. 928, 115th Cong. (2017).

[39] *Id.*

[40] *Id.*

[41] See note 24, *supra.*

[42] See note 24, *supra*.

[43] See notes 24, 33, and 34, *supra*.

[44] For methodology, see note 9, *supra*.

[45] Am. Psych. Assoc., Resolution on Appropriate Affirmative Responses to Sexual Orientation Distress and Change Efforts, http://www.apa.org/about/policy/sexual-orientation.aspx (last visited Dec. 18, 2017).