

**Phase One Implementation of 2022 Updates to the
NCAA Transgender Student-Athlete Participation Policy
Frequently Asked Questions**

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This document contains questions and answers to assist the NCAA membership in its understanding of the Jan. 19, 2022, Board of Governors' updates to the [NCAA Transgender Student-Athlete Participation Policy](#). While the policy updates will be implemented in three phases, this document focuses on the first phase of implementation, which starts with the 2022 NCAA winter and spring championship events.

Effective Date and Timing of Implementation

Question No. 1: The 2022 updates to the [NCAA Transgender Student-Athlete Participation Policy](#) were adopted with an immediate effective date. Does that mean the updates are being implemented immediately?

Answer: The policy updates will be implemented in three phases. Phase One will create new eligibility requirements for transgender student-athletes intending to compete in 2022 NCAA winter and spring championship events. No new eligibility requirements will be implemented for remaining 2022 winter and spring regular season competitions (including conference championships).

Application of Policy

Question No. 2: How does Phase One implementation apply to the 2022 NCAA winter and spring championships?

Answer: Trans Women (MTF)

To be eligible to compete in a 2022 NCAA winter or spring championship event in a women's sport, a trans woman's school must submit all of the following to the NCAA:

1. [Transgender Student-Athlete Eligibility Reporting Form](#).
2. [Medical Professional Confirmation of Hormone Suppression Form](#), to be completed/signed by the treating professional confirming completion of at least one calendar year of hormone suppression (consistent with the [2010 NCAA Transgender Student-Athlete Participation Policy](#)).
3. Laboratory results confirming that, as of a date that is not more than four weeks (28 days) before the [first championship selection date](#) in the applicable sport, the student-athlete's total serum testosterone level is within the allowable levels for the sport in which the student-athlete intends to compete.

Trans Men (FTM)

The policy updates do not change eligibility requirements for a trans man to compete in a 2022 NCAA winter or spring championship. However, consistent with the [2010 NCAA Transgender Participation Policy](#), if a trans man is receiving gender-affirming care that includes the use of an NCAA banned substance (e.g., testosterone therapy) the school must follow the [NCAA Medical Exception Policy](#).

Question No. 3: Do Phase One eligibility requirements reflect all aspects of applicable sport-specific national governing body and/or international federation policy requirements (e.g., gender declaration, testosterone threshold)?

Answer: No. Phase One eligibility requirements reflect only the total serum testosterone threshold component of these policies.

Question No. 4: What if a sport's NGB does not have a transgender athlete participation policy?

Answer: Where there is no NGB policy for a sport, the total serum testosterone threshold of the international federation has been considered. If there is no international federation policy, the NCAA threshold requirement is reflective of the [2015 International Olympic Committee threshold levels](#).

Additionally, sport-specific eligibility requirements will remain subject to ongoing review and recommendation by the NCAA Committee on Competitive Safeguards and Medical Aspects of Sports.

Question No. 5: What if an NGB or international federation changes its policy during the remainder of the 2022 winter and spring sport seasons?

Answer: In its review of applicable policies, CSMAS noted that while it would consider relevant changes to these policies that may occur following the publication of the new 2022 NCAA winter and spring championship event eligibility requirements, it intends to simultaneously prioritize fairness and to minimize any potential negative impact to student-athletes as part of any such consideration.

Total Serum Testosterone Threshold

Question No. 6: For Phase One implementation, where can a student-athlete or school find the applicable, sport-specific total serum testosterone threshold that will

apply for any trans woman intending to compete in a 2022 NCAA winter championship event in a women's sport?

Answer: See [Transgender Student-Athlete Participation Policy Dates, Deadlines and Testosterone Thresholds for Phase One](#) for a summary of NCAA Phase One total serum testosterone thresholds by sport.

Question No. 7: When will total serum testosterone thresholds be available for a trans woman intending to compete in a 2022 NCAA spring championship event?

Answer: It is expected that total serum testosterone thresholds for 2022 spring championship events will be available in mid-February.

Question No. 8: When must a student-athlete's one-time total serum testosterone test occur?

Answer: Evidence (e.g., lab results) of the one-time total serum testosterone level submitted on behalf of a trans woman student-athlete intending to compete in a 2022 NCAA winter or spring championship event in a women's sport must reflect a date that is no more than four weeks (28 days) before the first NCAA championship selection date for the applicable sport.

See [Transgender Student-Athlete Participation Policy Dates, Deadlines and Testosterone Thresholds for Phase One](#).

Question No. 9: Do Phase One eligibility criteria require that a trans woman's total serum testosterone levels fall within the NCAA sport-specific allowable levels for at least 12 months before competition?

Answer: No. Phase One eligibility criteria for trans women require documentation of a one-time total serum testosterone level within the allowable levels as of a date that is no more than four weeks (28 days) before the first NCAA championship selection date for the applicable sport.

Question No. 10: If a trans woman's total serum testosterone is close to the allowable threshold level (e.g., 10.0 nmol/mL when threshold is less than 10.0 nmol/mL) for their sport, will it be considered to meet the requirements?

Answer: No. However, a student-athlete may submit additional test results for reconsideration, provided submission occurs at least one week before the first championship selection date in the applicable sport.

Question No. 11: May a school pay for a trans woman's total serum testosterone test for purposes of establishing eligibility for competition in a 2022 NCAA winter or spring championship event in a women's sport?

Answer: Yes.

Documentation and Review Process

For detailed information regarding the eligibility documentation and review process, please see the [Transgender Student-Athlete Eligibility Review Procedures](#), [Transgender Student-Athlete Eligibility Reporting Form](#) and [Medical Professional Hormone Suppression Confirmation Form](#).

Question No. 12: When must an institution submit information to establish eligibility for a trans woman to participate in a 2022 NCAA women's winter or spring championship event?

Answer: For a trans woman to be eligible to participate in a 2022 NCAA winter or spring championship event in a women's sport, their school must submit all required eligibility materials no later than one week before the first NCAA championship selection date for the applicable sport. This timeline was established to allow for timely review by the CSMAS Medical Review Panel. See the [Transgender Student-Athlete Participation Policy Dates, Deadlines and Testosterone Thresholds for Phase One](#) for a complete listing of deadlines.

Question No. 13: What documentation must be submitted as part of the eligibility review procedures for a trans woman to compete at a 2022 NCAA women's winter or spring championship event in a women's sport?

Answer: A school must submit:

1. A completed [Transgender Student-Athlete Eligibility Reporting Form](#).
2. A completed [Medical Professional Confirmation of Hormone Suppression Form](#).
3. A copy of laboratory results confirming that, as of a date that is not more than four weeks (28 days) before the [first NCAA championship selection date](#) in the applicable sport, the student-athlete's total

serum testosterone level is within the allowable levels for the sport in which the student-athlete intends to compete.

For additional information, see the [Transgender Student-Athlete Eligibility Review Procedures](#).

Question No. 14: Who is responsible for reviewing required eligibility documentation submitted on behalf of a trans woman intending to compete in a 2022 NCAA winter and spring championship event in a women's sport?

Answer: Submitted eligibility documentation will be reviewed by, and corresponding eligibility determinations will be made by, the CSMAS Medical Review Panel. All submitted eligibility documentation will be redacted and de-identified before being shared with members of the Medical Advisory Panel.

Question No. 15: How will the Medical Review Panel's eligibility determination be communicated?

Answer: All questions, communications and eligibility determinations pertaining to this process will be directed to the individual identified as the school contact on the [Transgender Student-Athlete Eligibility Reporting Form](#).

In recognition of the sensitive nature of the content provided as part of this review, and the material variations in how member institutions may elect to manage and retain such information, a school is encouraged to consider the needs and expectations of the institution and the student-athlete when identifying an appropriate school contact.

Question No. 16: May a school appeal the Medical Review Panel's eligibility decision?

Answer: No. If the student-athlete is determined to be ineligible for competition in a 2022 NCAA winter or spring championship event, additional documentation (e.g., updated total serum testosterone lab results) may be reconsidered, provided submission occurs at least one week before the first championship selection date in the applicable sport.

Question No. 17: Must a school submit new documentation before each round of an NCAA championship in which a trans woman intends to compete?

Answer: No. Once initial documentation is submitted before the first selection date and an eligibility determination is shared with the institution, that eligibility determination will apply to all rounds of the applicable championship.

Question No. 18: Must a school separately submit required eligibility documentation for each sport if a trans woman intends to compete in 2022 NCAA women's winter or spring championship events in multiple women's sports (e.g., indoor track and field and outdoor track and field)?

Answer: Yes. Because allowable threshold eligibility levels and selection dates may vary from sport to sport, separate eligibility documentation is required for each women's sport in which a trans woman intends to compete for a 2022 NCAA women's winter or spring championship.

Question No. 19: If a student-athlete is determined to be ineligible to compete in a 2022 NCAA winter or spring championship pursuant to Phase One transgender eligibility review procedures, will they have an opportunity to request additional eligibility (e.g., season of competition waiver) for future years?

Answer: The Board of Governors encouraged the divisions to allow for additional, future eligibility if a trans student-athlete loses eligibility based on the policy updates, provided they meet future trans student-athlete eligibility requirements.

Resources

Question No. 20: Where can a school find additional resources to support transgender and nonbinary student-athletes, including those who are impacted by the recent transgender participation policy updates?

Answer: The NCAA's office of inclusion and Sport Science Institute recently released the [Gender Identity and Student-Athlete Participation Summit Final Report](#). The report assists ongoing membership efforts to support an inclusive environment that promotes and develops the mental and physical health of transgender and nonbinary student-athletes in collegiate sport.

In addition to the final report, the [2011 Inclusion of Transgender Student-Athletes handbook](#) continues to provide meaningful guidance. It should be noted that the handbook references the 2010 NCAA Transgender Student-Athlete Participation Policy, which has been updated through the January 2022 NCAA Board of Governors action.

Finally, we encourage schools to consider these additional NCAA [resources](#) available to support LGBTQ student-athletes, coaches and administrators, as well as those NCAA [resources](#) specifically focused on student-athlete mental health.