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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

STATE OF WASHINGTON, et al.,

Case No.: 6:25-cv-01748-AA

Plaintiffs,

v.

**UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES, et
al.,**

**DECLARATION OF RESA MATTHEW
IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

Defendants.

DECLARATION OF RESA MATTHEW

I, Resa Matthew, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am the Deputy Associate Commissioner of the Family and Youth Services Bureau (“FYSB”) within the Administration for Children & Families (“ACF”), a component of the U.S. Department of Health and Human Services (“HHS”).

2. In this role, I am responsible for assisting the FYSB Associate Commissioner in managing and providing leadership, direction, and coordination to the formula and discretionary grant programs and activities across the Bureau. This includes responsibility for implementation and coordination of the Runaway and Homeless Youth Division and the Division of Positive Youth Development.

3. This declaration is based upon my personal knowledge, information acquired by me in the course of performing my official duties, information contained in the records and systems of ACF to which I have access in the course of my duties, and information conveyed to me by other knowledgeable ACF employees with whom I work on a regular basis.

4. I submit this declaration in support of the Government’s Opposition to Plaintiffs’ Motion for Preliminary Injunction concerning the exclusion of gender ideology from the relevant grant programs. This declaration provides a factual explanation of the government’s actions that have been challenged in this litigation and the rationale behind those actions.

ACF Grants

5. ACF issues federal financial assistance awards like grants and cooperative agreements to promote the economic and social well-being of children, families, and communities. ACF issues and manages discretionary and non-discretionary awards to various entities including states, tribes, education institutions, non-profit, and for-profit organizations.

6. ACF issues both discretionary and non-discretionary grants and cooperative agreements that constitute federal financial assistance. *See* 2 C.F.R. § 200.1 (Definitions). Discretionary awards are awards in which ACF retains discretion to select the recipients and award amount given to each recipient. Selection of discretionary awards is generally competitive, and the amount of each award can either be competitive or determined by a set formula. Non-discretionary awards are awards in which ACF is required by statute to select specific recipients (and potentially the award amount), and include formula grants, block grants, Congressionally-directed spending, and others.

7. The discretionary or non-discretionary nature of an award is determined by the authorizing statute for the program.

8. All ACF grant recipients receive a Notice of Award once their grant application is approved. Notices of Award include Standard Terms and Conditions applicable to all ACF grant recipients and Supplemental Terms and Conditions that are specific to the grant and its associated authorizing statute and regulations.

Title V Sexual Risk Avoidance Education Grants

9. ACF, through FYSB's Division of Positive Youth Development, administers Title V Sexual Risk Avoidance Education ("SRAE") grants, which are authorized and funded under the Social Security Act at 42 U.S.C. § 710. SRAE was authorized in 2018 and replaced the Title V Community Based Abstinence Education program.

10. The purpose of SRAE is to provide funding to states and territories for the implementation of education exclusively focused on sexual risk avoidance. This education equips youth with the knowledge and skills to voluntarily refrain from engaging in non-marital sexual activity. The program is designed to instill personal responsibility, self-regulation, goal

setting, healthy decision-making, a focus on the future, and the prevention of youth risk behaviors such as drug and alcohol use. Notably, SRAE does not normalize non-marital teen sexual activity. *See* 42 U.S.C. § 710(b).

11. All content within SRAE programs must adhere to strict medical accuracy and completeness standards. This entails providing age-appropriate information, basing it on adolescent learning and developmental theories relevant to the target age group, and ensuring cultural appropriateness, recognizing the experiences of youth from diverse communities, backgrounds, and experiences. 42 U.S.C. § 710(b)(2).

12. “Medically accurate and complete” content is defined by statute as “verified or supported by the weight of research conducted in compliance with accepted scientific methods.” This includes information published in peer-reviewed journals, where applicable, or comprising information recognized by “leading professional organizations and agencies with relevant expertise in the field” as “accurate, objective, and complete.” 42 U.S.C. § 710(e)(2).

13. “Age-appropriate” content is defined as “suitable (in terms of topics, messages, and teaching methods) to the developmental and social maturity of the particular age or age group of children or adolescents, based on developing cognitive, emotional, and behavioral capacity typical for the age or age group.” 42 U.S.C. § 710(e)(1).

14. SRAE programs are mandated to address six distinct topics, each with an unambiguous and primary emphasis on promoting optimal health behaviors that avoid non-marital sexual activity. *See* 42 U.S.C. § 710(b). The six topics are:

(A) The holistic individual and societal benefits associated with personal responsibility, self-regulation, goal setting, healthy decision-making, and a focus on the future.

(B) The advantage of refraining from nonmarital sexual activity in order to improve the future prospects and physical and emotional health of youth.

(C) The increased likelihood of avoiding poverty when youth attain self-sufficiency and emotional maturity before engaging in sexual activity.

(D) The foundational components of healthy relationships and their impact on the formation of healthy marriages and safe and stable families.

(E) How other youth risk behaviors, such as drug and alcohol usage, increase the risk for teen sex.

(F) How to resist and avoid, and receive help regarding, sexual coercion and dating violence, recognizing that even with consent teen sex remains a youth risk behavior.

15. The SRAE authorizing statute does not mention gender ideology in any capacity.

See generally 42 U.S.C. § 710.

16. SRAE funding is distributed to states and territories based on the proportion of low-income children residing within each state or territory. States and territories are eligible to apply for SRAE funding annually. If a state or territory does not apply for the funds, local organizations or entities within the state or territory may competitively apply for the state or territory's portion of SRAE funding. Allotments to these organizations or entities are awarded on a competitive basis. *See* 42 U.S.C. § 710(a).

17. Based on availability of appropriations, an initial FY25 Notice of Award was issued on January 6, 2025 and covered 25% of FY25 funding. An additional Notice of Award covering the remainder of FY25 funding was issued to states and territories on August 6, 2025.

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Personal Responsibility Education Program Grants

18. ACF, through FYSB's Division of Positive Youth Development, also administers Personal Responsibility Education Program ("PREP") grants, authorized and funded under the Social Security Act at 42 U.S.C. § 713. PREP was authorized in 2010.

19. The purpose of PREP is to fund states and territories to educate youth and young adults on both abstinence and contraception to prevent pregnancy and sexually transmitted infections ("STIs"), including HIV/AIDS, and on at least three of the six "adult preparation subjects" listed in the statute. *See* 42 U.S.C. § 713(b).

20. All content contained in PREP grants must adhere to strict medical accuracy and completeness standards. It should provide age-appropriate information and engage in activities that promote healthy sexual development. Furthermore, PREP content must replicate evidence-based effective programs or substantially incorporate elements of proven programs that have demonstrated a track record of successfully changing behavior on the basis of rigorous scientific research. This includes delaying sexual activity, increasing condom or contraceptive use for sexually active youth, or reducing pregnancy rates among youth. Additionally, the content should be taught within the cultural context that is most appropriate for individuals in the particular population group to which they are directed.

21. In addition to these requirements, PREP content must also include activities that educate youth who engage in sexual activity about responsible sexual behavior, including both abstinence and contraception. It should place substantial emphasis on both abstinence and contraception as means of preventing pregnancy among youth and sexually transmitted infections. 42 U.S.C. § 713(b)(2)(B).

22. “Medically accurate and complete” means “verified or supported by the weight of research conducted in compliance with accepted scientific methods and—(A) published in peer-reviewed journals, where applicable; or (B) comprising information that leading professional organizations and agencies with relevant expertise in the field recognize as accurate, objective, and complete.” 42 U.S.C. § 713(e)(2).

23. “Age-appropriate” means “topics, messages, and teaching methods suitable to particular ages or age groups of children and adolescents, based on developing cognitive, emotional, and behavioral capacity typical for the age or age group.” 42 U.S.C. § 713(e)(1).

24. PREP grant recipient must select at least three of six “adult preparation topics” listed in the statute to include in their program, *see* 42 U.S.C. § 713(b)(2). The six topics are:

(A) Healthy relationships, including marriage and family interactions.

(B) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects.

(C) Financial literacy.

(D) Parent-child communication.

(E) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity.

(F) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.

25. The PREP authorizing statute does not mention gender ideology in any capacity. *See generally* 42 U.S.C. § 713.

26. PREP funding is distributed to states and territories proportionally to the youth population between ages 10 and 19 within each state or territory. States and territories are eligible to submit annual applications for PREP funding, and the allocated funds are available for expenditure over a three-year period. *See* 42 U.S.C. § 713(a).

27. In the event that a state or territory does not apply for the funds—or if the state or territory did not apply in 2010 or 2011—local organizations or entities within the state or territory may apply for the state or territory’s portion of PREP funding. Allotments to these entities are awarded on a competitive basis. *See* 42 U.S.C. § 713(a)(4).

28. Based on availability of appropriations, an initial FY25 Notice of Award was issued on December 27, 2024 and covered 25% of FY25 funding. An additional Notice of Award covering the remainder of FY25 funding was issued to states and territories on August 6, 2025.

Medical Accuracy Review

29. Both the SRAE and PREP authorizing statutes require that program materials be “medically accurate and complete.” Consequently, FYSB oversees a medical accuracy review (“MAR”) for all content used in PREP and SRAE programs. PREP and SRAE Supplemental Terms and Conditions, incorporated into Notices of Awards, require grant recipients to provide all program materials to FYSB for medical accuracy reviews upon request.

30. MARs are conducted with support of a contractor, Grey Matters Technology Services and its sub-contractor, VECRA, and all documents must be reviewed in comparison to current medical statements of fact and in accordance with the most up to date scientifically supported information. Two independent reviewers are assigned to each grant recipient’s submissions. The contractors make recommendations to ACF for the agency to make medical

accuracy decisions. Grant recipients are expected to meticulously review their own materials for medical accuracy prior to submitting content for a MAR and should make updates to materials as needed to ensure all content is medically accurate and complete.

31. PREP and SRAE MARs are typically conducted every five years and may be conducted more frequently upon request by FYSB.

32. Earlier medical accuracy reviews did not include any evaluation of gender ideology content. MAR reviewers have never been asked to assess the medical accuracy of assertions regarding the distinction between gender identity and biological sex or whether boys can identify as girls or vice versa. FYSB has not received any scientific materials from Plaintiffs or other PREP or SRAE grant recipients supporting gender ideology.

California PREP Medical Accuracy Review and Grant Termination

33. On March 27, 2025, ACF sent a letter to California's Department of Public Health requesting all curricula and program materials in use or approved for the use in California's State PREP grant to facilitate a medical accuracy review. California was selected as the first state in the review because it received more federal funding for PREP than any other state or territory. Attached as **Exhibit A** is a true and correct copy of the March 27, 2025 letter to California requesting curricula and programmatic materials.

34. While preparing California's PREP content for the medical accuracy review, ACF identified content in many of the submitted materials that fell outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the materials included multiple examples of gender ideology content.

35. Due to the content being outside of the scope of the authorizing statute, FYSB did not conduct a medical accuracy review on California's PREP program materials, as any such review of the state's material would have been moot.

36. ACF issued a letter to California that informed the state that all gender ideology content would need to be removed from PREP curricula and programmatic materials to comply with the authorizing statute. The letter included specific examples of the gender ideology content in California's State PREP materials that ACF had identified for removal. California was given until August 19, 2025, to remove all content in question. Attached as **Exhibit B** is a true and correct copy of the June 20, 2025 PREP directive letter to California.

37. The letter acknowledged that FYSB had, under previous administrations, approved California's State PREP curricula and materials including gender ideology content. However, because such content exceeded the program's legislatively authorized purposes and activities the law required that the content be removed. *See id.*

38. California responded to ACF's letter on August 19, 2025, and informed ACF that the state would not be making any of the requested changes to its PREP materials. Attached as **Exhibit C** is a true and correct copy of California's August 19, 2025 letter.

39. ACF terminated California's State PREP grant on August 21, 2025, for failure to comply with the request to remove gender ideology content from program curricula and materials. Attached as **Exhibit D** is a true and correct copy of the August 21, 2025 letter terminating California's PREP grant.

40. California administratively appealed ACF's termination decision before the HHS Departmental Appeals Board on September 19, 2025. That case is currently pending. HHS DAB Case No. A-25-117.

**State and Territory PREP Medical Accuracy Review and
Gender Ideology Directive Letters**

41. After finding gender ideology content in California's State PREP materials, FYSB sent a letter to all state and territory PREP grant recipients on April 14, 2025, requesting all curricula and program materials in use or approved for use to facilitate a medical accuracy review. All plaintiffs complied with the request for materials. Attached as **Exhibit E** is a true and correct copy of the April 14, 2025 letter to all state and territory PREP grant recipients requesting curricula and programmatic materials.

42. As with California's State PREP materials, ACF identified content in many of the submitted materials that fell outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. PREP materials from almost all states and territories receiving PREP funds included some gender ideology content.

43. FYSB did not conduct a medical accuracy review of the collected program materials after identifying gender ideology content because those references were outside of the scope of the authorizing legislation. Consequently, any review of the material would be moot.

44. On August 26, 2025, ACF issued a letter to Plaintiffs and other states and territories that contained gender ideology content in their PREP materials. The letter informed them that all gender ideology content would need to be removed from PREP curricula and programmatic materials to comply with the authorizing statute. Each letter included specific examples of the gender ideology content in the recipient's program that ACF had identified for removal. States and territories were given until October 27, 2025, to remove all content in question. Attached as **Exhibit F** is a true and correct copy of the August 26, 2025, PREP directive letters to Plaintiffs and all state and territory PREP grant recipients.

45. While the scope of gender ideology content in each state or territory's materials varied, in general, the curricula that ACF received from PREP grant recipients that did include gender ideology content contained marginal amounts of such content in relation to the full text of those program materials. For example, 11 of the 16 Plaintiffs in this lawsuit informed ACF that they are incorporating into their PREP and SRAE programs a curriculum entitled "Making Proud Choices," which has a very small amount of gender ideology content.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 10, 2025.

RESA F. MATTHEW -S

Digitally signed by RESA F.
MATTHEW -S
Date: 2025.10.10 21:11:13 -04'00'

Resa Matthew
Deputy Associate Commissioner
Family and Youth Services Bureau



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, D.C. 20201 | www.acf.hhs.gov

March 27, 2025

Sydney Armendariz
California State Personal Responsibility Education Program (PREP)
Division Chief, Maternal Child, and Adolescent Health Division
CA Dept of Public Health/Maternal Child, and Adolescent Health Division
1615 Capitol Avenue, MS 8306
Sacramento, CA 05899

RE: State Personal Responsibility Education Program for Fiscal Years 2023 (Grant # 2301CAPREP), 2024 (Grant #2401CAPREP) & 2025 (Grant # 2501CAPREP).

Dear Ms. Armendariz:

The Administration for Children and Families (ACF), Family and Youth Services Bureau (FYSB), Division of Positive Youth Development's State Personal Responsibility Education Program (PREP) grant recipients and subrecipients are required to comply with all statutory requirements of PREP including ensuring the programs are "medically accurate and complete" and the program provides "age-appropriate" information and activities. 42 U.S.C. § 713(b)(2)(B); *See also* 45 CFR § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award); and 45 CFR § 75.364(a) (requiring grantees to provide HHS with access to any records pertinent to the Federal award).

In accordance with the terms and conditions of your State Personal Responsibility Education Program grants, you may be requested to submit curricula and programmatic materials to FYSB, for a medical accuracy review, as specified in the *Terms and Conditions, Other Terms and Conditions Section under Program Reporting and Requirements*.

This letter is to request that you submit the curricula and programmatic materials you are currently implementing, for a medical accuracy review. Please submit these curricula and materials within three (3) business days, and no later than Tuesday, April 1, 2025. You will receive instructions for submitting these materials from your Federal Project Officer (FPO), Latanya Bispham Robinson, before the due date.

Please email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

/s/ Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, D.C. 20201 | www.acf.hhs.gov

June 20, 2025

Sydney Armendariz
California State Personal Responsibility Education Program (PREP)
Division Chief, Maternal Child, and Adolescent Health Division
CA Dept of Public Health/Maternal Child, and Adolescent Health Division
1615 Capitol Avenue, MS 8306
Sacramento, CA 05899

RE: State Personal Responsibility Education Program for Fiscal Years 2023 (Grant # 2301CAPREP), 2024 (Grant #2401CAPREP) & 2025 (Grant # 2501CAPREP)

Dear Ms. Armendariz:

On March 27, 2025, the Administration for Children and Families (ACF) requested that California provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing California's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from California's PREP curricula and program materials:¹

Rights, Respect, Responsibility

- Middle School Lesson 1, Page 3: "We've been talking during class about messages people get on how they should act as boys and girls—but as many of you know, there are also people who don't identify as boys or girls, but rather as transgender or gender queer. This means that even if they were called a boy or a girl at birth and may have body parts

¹ ACF initiated a medical accuracy review to determine if California's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, California will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

that are typically associated with being a boy or a girl, on the inside, they feel differently.”

- Teachers Guide, Page 23: “Gender Identity: A person’s deep-seated, internal sense of who they are as a gendered being – specifically, the gender as which they identify. All people have a gender identity. An adjective used to describe a person whose gender identity is incongruent with (or does not “match”) the biological sex they were assigned at birth is “transgender.” An adjective used to describe a person whose gender identity is congruent (or “matches”) the biological sex they were assigned at birth is “cisgender.” Other gender identities may include non-binary, agender, bigender, genderfluid, and genderqueer.”

Making Proud Choices 5th Edition Facilitator Curriculum California

- Page 279: “Transgender refers to a person’s gender identity. Gender identity is your inner sense of your gender—Do you feel like a guy? Do you feel like a girl? Do you feel like something different than a guy or a girl? Often gender identity matches a person’s body—someone with a girl’s body feels like a girl on the inside or someone with a boy’s body feels like a boy on the inside—but not always. Transgender is when a person’s inner feelings about gender identity don’t match the body.”

Teen Talk High School

- Page 38: “Remind students that some men are born with female anatomy, some women are born with male anatomy.”
- Page 85: “Gender Identity describes the way a person feels internally and socially. This is essentially a social status defined by a community’s expectations for behavior.”
- Page 87: “Genderqueer, gender non-conforming, and gender expansive are more terms that people use to describe their experience of being non-binary. Each person’s experience of being non-binary is unique, in the same ways that each person’s experience of being a man or of being a woman is unique.”
- Page 86: “Trans is an umbrella category that describes anyone whose sex assigned at birth does NOT match their gender identity. Some trans people may choose to transition in any combination of the following ways:
 - Social transitioning: may include telling others about their gender identity, changing their name, asking others to address them using a new name and/or gender pronouns, and changing their gender expression to better reflect their identity.
 - Medical transitioning: altering their body by going through hormone therapy (using testosterone or estrogen) or having gender-affirming surgeries. Common

surgeries include top surgery (adding or removing breast tissue) and bottom surgery (transforming the genitals).”

Teen Talk Middle School

- Page 82: “If someone’s sex assigned at birth does not match with their gender identity, or how they feel inside, they might identify as “transgender.” For example: if someone is born with female body parts, hormones, and DNA, and inside they feel like a man.”²

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2). The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).³ The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. *See* 45 C.F.R. §§ 75.403-405. We are aware that this curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. California’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. *See* 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable).

ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. *See* 45 C.F.R. § 75.371. **Therefore, ACF instructs California to remove all content concerning gender ideology from its**

² We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact Federal Project Officer, Latanya Bispham-Robinson at Latanya.Bispham-robinson@acf.hhs.gov.

³ 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the first page of this letter provides examples of gender ideology content that does not adhere to the PREP statute; California is directed to remove these and all similar language throughout their curricula and program materials. Should California fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. *See* 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than August 19, 2025, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive, slightly slanted style.

Andrew Gradison

Acting Assistant Secretary
Administration for Children and Families



Health and Human Services Agency
California Department of Public Health



Erica Pan, MD, MPH
Director and State Public Health Officer

Gavin Newsom
Governor

August 19, 2025

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families
Department of Health and Human Services
330 C Street, S.W., Suite 4034
Washington, D.C. 20201

RE: State Personal Responsibility Education Program for Fiscal Years 2023 (Grant # 2301CAPREP), 2024 (Grant #2401CAPREP) & 2025 (Grant # 2501CAPREP)

Dear Mr. Gradison,

On June 20, 2025, the Administration for Children and Families (ACF) requested that the California Department of Public Health (CDPH) remove all content concerning “gender ideology” from curriculum and program materials utilized by Personal Responsibility Education Program (PREP) implementing agencies, and provide a copy of the modified materials to ACF by August 19, 2025.

CDPH will not make any such modifications at this time for several reasons. First, as noted in ACF’s request, all materials that a California PREP implementing agency may use have been previously reviewed and approved by your agency. For good reason: the materials are medically accurate and directly relevant to the purposes of personal responsibility education programs set out in the authorizing statute. These include educating youth about “abstinence and contraception for the prevention of pregnancy and sexually transmitted infections” and “adulthood preparation subjects” such as “healthy relationships,” “adolescent development, such as the development of healthy attitudes . . . about adolescent growth and development, body image, . . . and other related subjects,” and “healthy life skills.” 42 U.S.C. § 713(b)(2)(B), (C).

Second, there is no federal law or regulation that authorizes ACF to take any “enforcement action” described in the June 20, 2025 letter. Indeed, consistent with ACF’s prior approval of the materials at issue, the materials comply with all federal laws and regulations. And finally, the materials fully comply with state law, and ACF’s proposed modifications may prevent PREP materials from use by California school districts. See Cal. Educ. Code § 51933(d)(6).

In short, CDPH will continue to comply with federal and California law regarding personal responsibility and sexual health education of youth and pupils in the state.

CDPH reserves the right to challenge any adverse action that ACF or any other federal agency may take as a result of this inability to comply with ACF's request to modify the curriculum and program materials for PREP available to implementing agencies. Thank you for your attention to this matter, and please be sure to copy our Department's Chief Counsel, Drew Brereton, on any responses or follow-up questions. Mr. Brereton can be reached at Drew.Brereton@cdph.ca.gov.

Sincerely,

Matthew Green
Deputy Director, Center for Family Health
California Department of Public Health
1615 Capitol Avenue
Sacramento, CA 95814



ADMINISTRATION FOR
CHILDREN & FAMILIES
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August 21, 2025

Sydney Armendariz
California State Personal Responsibility Education Program (PREP)
Division Chief, Maternal Child, and Adolescent Health Division
CA Dept of Public Health/Maternal Child, and Adolescent Health Division
1615 Capitol Avenue, MS 8306
Sacramento, CA 95814

Matthew Green
Deputy Director, Center for Family Health
California Department of Public Health
1615 Capitol Avenue
Sacramento, CA 95814

RE: State Personal Responsibility Education Program for Fiscal Years 2023 (Grant # 2301CAPREP), 2024 (Grant #2401CAPREP) & 2025 (Grant # 2501CAPREP)

Dear Ms. Armendariz and Mr. Green:

Pursuant to 45 Code of Federal Regulations (C.F.R.) §§ 75.371(c), 75.372(a)(1), and 75.373(a), this letter constitutes official notification that the U.S. Department of Health and Human Services (HHS), Administration for Children and Families (ACF), Family and Youth Services Bureau (FYSB)'s, Division of Positive Youth Development, is hereby terminating all California State Personal Responsibility Education Program (PREP) awards and suspending the funding effective August 21, 2025. The effect of this termination is to shorten the duration of the current budget and project periods without the possibility of additional support under the above-referenced grant awards. California shall not incur new obligations after the effective date of the termination and shall take steps to cancel as many outstanding obligations as possible.

ACF is taking this action for two reasons: (1) the grant is not being administered consistent with the authorizing statute because the funded programs and services include gender ideology which is outside the scope of the statute; and (2) California has failed to modify its State PREP content to remove all references to gender ideology consistent with the additional conditions imposed by ACF. As a result, California failed to demonstrate that the grant and maintenance-of-effort funds are being used on allowable costs, which violates the terms and conditions of the state's three current grant awards. For these reasons, ACF is terminating each of the grants awarded under the California State PREP.

Summary of Findings

On March 27, 2025, ACF requested that California submit all State PREP curricula and programmatic material for a medical accuracy review, in accordance with the terms and conditions of California's three State PREP grants. *See* March 27, 2025 letter; *California State PREP Terms and Conditions, Other Terms and Conditions Section under Program Reporting and Requirements*. California was given three business days from receipt of the letter to provide its curricula and programmatic materials. California submitted its State PREP content on April 1, 2025.

While preparing California's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that falls outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, ACF identified multiple examples of gender ideology content, including lessons teaching students that gender identity is distinct from biological sex and that boys can identify as girls and vice versa.

On June 20, 2025, ACF sent a letter to California that imposed additional grant conditions instructing California to remove all content concerning gender ideology from its State PREP curricula, program materials and any other aspects of its program delivery within 60 days of receipt of the letter and to provide a copy of the modified materials to ACF for approval. *See* June 20, 2025 letter. The letter included specific examples of content in California's State PREP curricula and programmatic materials that constituted unallowable gender ideology teachings that are outside the scope of the authorizing statute and needed to be removed. *Id.* All responsive materials were due on August 19, 2025.

California submitted a response to ACF dated August 19, 2025. California responded, "CDPH will not make any such modifications at this time for several reasons." The listed reasons were: 1) PREP materials had already been reviewed and approved by ACF; 2) the materials are medically accurate; 3) the gender ideology content is relevant to purposes identified in the authorizing statute, specifically the adult preparation subjects listed at 42 U.S.C. § 713(b)(2)(C); and 4) ACF does not have authority to take an enforcement action. *See* August 19, 2025 California letter.

ACF addresses each argument below, but begins here with ACF's authority to terminate California State PREP. The authorizing statute, 42 U.S.C. § 713, and applicable HHS grant regulations at 45 C.F.R. Part 75 establish requirements to which all funded projects must comply or be subject to enforcement actions.

Basis for Termination

ACF is taking this enforcement action under 45 C.F.R. §§ 75.371(c), 75.372(a)(1) and 75.373(a). California's areas of noncompliance are detailed as follows:

1. California State PREP is noncompliant with the federal authorizing statute.

As explained in the June 20, 2025 letter, gender ideology content is outside the scope of PREP's authorizing statute. The "purpose" of a PREP grant award is for states to "carry out personal responsibility education programs consistent with this subsection." 42

U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2). 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects:

- (i) Healthy relationships, including marriage and family interactions
- (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects
- (iii) Financial literacy
- (iv) Parent-child communication
- (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity
- (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C). The statute does not require, support, or authorize teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute. Applicable regulations require Federal grant recipients to comply with Federal statutes, regulations, and the terms and conditions of the Federal awards, which would include a requirement to comply with the PREP authorizing statute. *See* 45 C.F.R. § 75.303(b). Similarly, Standard Terms and Conditions that are incorporated by reference in each Notice of Award requires grant recipients to comply with “requirements of statutes and regulations applicable to the program under which the award is funded, including authorizing statutes, appropriations statutes, generally applicable statutes, and any regulations related thereto.” *See* ACF Standard Terms and Conditions, *Federal Financial Award Assistance*, at 4 (applicable to NOA for Grant #2301CAPREP, NOA for Grant #2401CAPREP, and NOA for Grant # 2501CAPREP).

In its August 19th response, California maintains that gender ideology is authorized under the PREP authorizing statute, specifically under the adult preparation subjects at 42 U.S.C. 713(b)(2)(C). In addition to the fact that gender ideology is not relevant to abstinence and contraception education, gender ideology is also not relevant to the adult preparation subjects listed in the statute. Furthermore, gender ideology is not supported by the weight of science, and thus cannot inform the adult preparation subjects that California refers to such as healthy relationships, healthy attitudes and values about adolescent growth and development, or healthy life skills.

In addition, in its response, California maintains that gender ideology is medically accurate. However, California has not met its statutory obligation to demonstrate that gender ideology is medically accurate. The authorizing statute at 42 U.S.C. § 713(e)(2) defines “medically accurate and complete” as:

verified or supported by the weight of research conducted in compliance with accepted scientific methods and—

(A) published in peer-reviewed journals, where applicable; or

(B) comprising information that leading professional organizations and agencies with relevant expertise in the field recognize as accurate, objective, and complete.

This is a very high statutory burden to meet, and ACF notes that California, as with other arguments within its response, simply makes a conclusory statement (claiming medical accuracy).

Because California State PREP’s gender ideology content is unauthorized by the PREP program statute, the inclusion of any such content in a program or service that is funded with a State PREP grant violates the statute. The gender ideology content in California’s program, including but not limited to the examples listed in the June 20 letter, are wholly unrelated to the statutory requirements and exceed the statutory authority. While we realize that ACF previously approved gender ideology content in the curricula and other programmatic materials, that decision was made in error because such approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress.

Moreover, gender ideology content does not comply with the applicable HHS regulations that limit the expenditure of grant and maintenance-of-effort funds to allowable costs, because such content is not necessary, reasonable, or allocable for the performance of this award. *See* 45 C.F.R. §§ 75.403(a), 75.404(b), and 75.405(a).

2. California failed to adhere to ACF’s additional conditions imposed for noncompliance.

California has failed to correct the deficiencies in its State PREP grant and notify ACF accordingly when given an opportunity to do so.¹ ACF’s June 20, 2025 letter requested that California remedy its noncompliance within 60 days of receipt of the letter by providing a copy of the modified materials to ACF for approval. *See* June 20, 2025 letter. ACF’s instructions constituted an additional condition on California’s State PREP grant imposed to remedy noncompliance under 45 C.F.R. § 75.371. California has responded that it will not comply with the imposed conditions, writing “CDPH will not make any

¹ In its response, California asserts that “the materials fully comply with state law, and ACF’s proposed modifications may prevent PREP materials from use by California school districts.” Neither the prior correspondence nor this enforcement letter concern any wholly state-funded program.

such modifications at this time for several reasons.” *See* August 19, 2025 California letter.

It is a fundamental principle of grants law that a grantee bears the burden of demonstrating the allowability and allocability of costs for which it received federal funding. ACF imposed additional conditions that would enable it to show that funds are being used for allowable costs and California, as a PREP grantee, has an obligation to comply in order to meet its burden of demonstrating allowability.

Given the bases outlined above, termination of all California State PREP grants is now appropriate. *See* 45 C.F.R. § 75.371.

Summary of Violations

The above stated facts demonstrate that California is in violation of 42 U.S.C. § 713, 45 C.F.R. § 75.303(b), 45 C.F.R. §§ 75.403(a), 75.404(b), and 75.405(a) and the terms and conditions of the State PREP grant awards. California has demonstrated an unwillingness to modify its State PREP award to adhere to the PREP authorizing statute. Despite receiving an opportunity to correct the identified deficiencies, California has refused to make ACF’s requested modifications. Therefore, the Administration for Children and Families has concluded that all California State PREP grants must be terminated.

Please note that this letter does not foreclose ACF from exercising its authority to pursue any other enforcement remedies that are authorized, such as disallowances, pursuant to 45 CFR § 75.371.

Next Steps

ACF will respond separately to drawdown requests that California PREP has submitted through the Payment Management System (PMS) for costs resulting from obligations that occurred prior to August 20, 2025, and any subsequent such requests received from California State PREP within the closeout period. Upon receipt of this letter, California State PREP must take the necessary steps to close out project operations, consistent with the requirements of 45 CFR § 75.381. Per 45 CFR § 75.471, certain costs associated with the termination of an award may be allowable to the award.

Communication will be issued in the coming weeks regarding the process for submitting those costs for approval for payment. Additional un-issued approved funding may be made available during the closeout period of the award for approved costs.

Appeal

This is the final decision of the Administration for Children and Families. It shall be the final decision of the Department unless, within 30 days after receiving this decision, you submit a notice of appeal to the Departmental Appeals Board (DAB), in accordance with 45 C.F.R. § 16.7.

The notice of appeal should note that you intend an appeal, state the amount in dispute, and briefly state why you think the decision is incorrect. Please attach a copy of this decision to your

notice of appeal. Appeals may be filed electronically using the Departmental Appeals Board's e-filing system, DAB E-File, at <https://dab.efile.hhs.gov>. To use E-File, you or your representative must become a registered user. Detailed instructions can be found on the DAB E-File homepage. Submissions are considered made on the date successfully transmitted via DAB E-File. The DAB will notify you of further procedures.

When submitting your appeal to the DAB, please send a copy of your notice of appeal to David Lee, Grants Management Officer, Office of Grants Management: david.lee@acf.hhs.gov.

Inasmuch as this Notice is sent on August 21, 2025 by Certified Mail, electronic mail, and facsimile, it shall be deemed received by California State PREP as of August 21, 2025 and will be effective August 21, 2025 Eastern Standard Time.

If you have questions regarding the information provided in this letter, please contact Mousumi Banikya, Director, Division of Positive Youth Development, at mousumi.banikya@acf.hhs.gov or Resa Matthew, Deputy Associate Commissioner, Family and Youth Services Bureau at resa.matthew@acf.hhs.gov.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families

cc: Drew Brereton, Chief Counsel, California Department of Public Health
Drew.Brereton@cdph.ca.gov



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, D.C. 20201 | www.acf.hhs.gov

April 14, 2025

RE: State Personal Responsibility Education Program for Fiscal Years 2023, 2024 & 2025.

Dear State Personal Responsibility Education Program Grant Recipients:

The Administration for Children and Families (ACF), Family and Youth Services Bureau (FYSB), Division of Positive Youth Development's State Personal Responsibility Education Program (PREP) grant recipients and subrecipients are required to comply with all statutory requirements of PREP including ensuring the programs are "medically accurate and complete" and the program provides "age-appropriate" information and activities. 42 U.S.C. § 713(b)(2)(B); *see also* 45 CFR § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award); and 45 CFR § 75.364(a) (requiring grantees to provide HHS with access to any records pertinent to the Federal award).

In accordance with the terms and conditions of your State Personal Responsibility Education Program grants, you may be requested to submit curricula and programmatic materials to FYSB, for a medical accuracy review, as specified in the *Terms and Conditions, Other Terms and Conditions Section under Program Reporting and Requirements*.

This letter is to request that you submit for a medical accuracy review any current curricula and programmatic materials in use or in any way relevant to your State PREP grant. This includes both the curricula and programmatic materials you are currently implementing as well as any curricula and programmatic materials you have approved for use by subrecipients or subcontractors in your state's PREP program. Please submit these curricula and materials within three (3) business days, and no later than Thursday, April 17, 2025, at 11:59 pm ET.

Instructions for submitting these curricula and materials are as follows:

- Provide electronic copies of all curricula materials and supplemental information that will be provided to facilitators and program participants, including, but not limited to:
 - Teacher Manual
 - Student Manual
 - Handouts
 - Video Links
 - DVDs

- Brochures
- PowerPoints
- Text Messages
- Video Game Content
- Consent/Assent Forms

The purpose for the medical accuracy review of program materials is to ensure the information being shared with program participants is medically accurate and complete. A Guidance Document on the medical accuracy review process is attached to this email. Be sure to complete the attached Grantee Submission Form to identify all program materials that will be uploaded to Dropbox. It is very important this form be submitted along with your curricula. We ask that all supplemental materials be listed at the bottom of the form, separate from the curricula files.

Please email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison

Acting Assistant Secretary
Administration for Children and Families

Enclosures:

Medical Accuracy Review Guidance Document
Grantee Submission Form



ADMINISTRATION FOR
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Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Mr. Thomas Miller
Alabama State Personal Responsibility Education Program (PREP)
Alabama Dept. of Public Health
201 Monroe Street, Suite 1350
Montgomery, AL 36104-3735

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023
(#2301ALPREP), 2024 (#2401ALPREP), and 2025 (#2501ALPREP).

Dear Mr. Miller:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Alabama provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Alabama's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Alabama's PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if Alabama's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Alabama will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Making Proud Choices! 5th Edition, Facilitator Curriculum

- Page 36 (Module 1, Activity B Procedure. Facilitator's Note): "Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don't always line up with what observers might expect based on a person's perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group."
- Pages 39-40 (Module 1, Activity C Procedure): "Respect Diversity: Let's keep in mind that there's diversity in society and in this group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren't even thinking about it. Some have had sexual intercourse. Some have had sex because they chose to; others may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender. All of these differences make us unique. Regardless of how you see yourself, your background, previous relationships or experience, each of you has a place in this group. This will be safe place for everyone."

Making Proud Choices! Adaptation for Youth in Out-of-Home-Care Facilitator curriculum

- Page 50 (Module 1, Activity C, Talking Circle, Facilitator's Note): "Asking participants to tell you their preferred pronouns is a way of creating safe space for any transgender or gender nonconforming youth. Model what you want participants to say by giving your own preferred pronouns. Some transgender youth might prefer typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Preferred pronouns don't always line up with what observers might expect based on a person's perceived biological sex. The simple act of requesting preferred pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group."

The "purpose" of a PREP grant award is for states to "carry out personal responsibility education programs consistent with this subsection." 42 U.S.C. § 713(b)(1). The statute defines PREP as "a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C)." 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress. Alabama's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Alabama to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Alabama is directed to remove these and all similar language throughout their curricula and program materials. Should Alabama fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60)

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: "(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management."

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Sierra Baker at sierra.baker@acf.hhs.gov.

days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink, reading "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



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Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Hannah Guzzi, Adolescent Health Program Specialist
Alaska Department of Health & Social Services
3601 C Street, Suite 322
Anchorage, AK 99503

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301AKPREP), 2024 (#2401AKPREP), and 2025 (#2501AKPREP).

Dear Alaska Department of Health & Social Services:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Alaska provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Alaska PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Alaska's PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if Alaska's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Alaska will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

The Fourth R, Teacher Manual and Curriculum

- Unit 3: Human Development and Sexual Health, pages 218-19: “Gender Identity- A person’s own sense of identification as male or female. Not necessarily the same as an individual’s biological identity.

Transgender – A term for a person whose gender identity does not match society’s expectations for someone with their physical sex characteristics.

Two Spirited – A term used in some Native American communities. This refers to people having both a male and female spirit. This can include ideas of both sexual orientation and gender identity.

Pansexual – People who are physically and/or emotionally attracted to members of any sexual orientation or gender identity. Their attraction is not limited to any specific group.

Transsexual – A person who experiences intense personal and emotional discomfort with his or her birth gender and may undergo treatment to transition gender.

Gender Expression – The way in which people express their gender identity to others. This may be the stereotypical expressions of male or female; it may also be a combination of the two genders or a mixed or multiple model of male and female expressions.”

- Page 230: “Explain to students that being in high school presents many challenges and is often a difficult time for many students. Furthermore, students who may be questioning their gender identity or sexual orientation or for students who don’t feel like they fit into what society expects of them in terms of gender roles or relationships are presented with additional pressures and challenges.”

Healthy Relationships Plus, Teacher Manual and Curriculum

- Page 36: “Language Matters. It is important to use gender neutral language while facilitating the sessions. Every effort has been made in these sessions to use language that is gender neutral. We want to provide a space where all students feel welcome and safe, therefore the proper use of language is a key component for consideration.”
- Page 49: “Do you think there is any difference in how someone chooses their friend/partner if they are LGBTQ (lesbian, gay, bisexual, trans*, two spirited, queer)?”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute

defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. Alaska’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Alaska to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Alaska is directed to remove these and all similar language throughout their curricula and program materials. Should Alaska fail to make the appropriate modifications to its PREP curricula and program materials, ACF

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Chéri Thompson at Cheri.Thompson@acf.hhs.gov.

may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in cursive script that reads "Andrew K. Gradison".

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Jessica Lopez
Arizona Department of Health Services
150 N 18th Ave., Suite 500
Phoenix, AZ 85007

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (2301AZPREP), 2024 (2401AZPREP), and 2025 (2501AZPREP).

Dear Ms. Lopez:

On April 14, 2025, the Administration for Children and Families (ACF) requested that the Arizona Health Department provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Arizona Health Department's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Arizona Health Department's PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if the Arizona Health Department's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, the Arizona Health Department will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Making Proud Choices! 5th Edition, Facilitator Manual

- Page 36 (Module 1, Activity B Procedure, Facilitator's Note): "Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus 'outing' themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don't always line up with what observers might expect based on a person's perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group."
- Pages 39-40 (Module 1, Activity C Procedure): "**Respect diversity:** Let's keep in mind that there's diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren't even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other's may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender."

Young people may express themselves in ways that don't conform with their biological sex. There are many ways that youth can express their gender identity. .
..

Define terms related to diversity as needed.

I want to be sure everyone under understands some of the terms we use when talking about diversity.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples' inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn't fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics."

Teen Outreach Program (TOP), Curriculum

- LAM-SU-A2, “Defining Sexuality” chapter, page 80:

“Facilitator Tip: Sexuality is complex and can be difficult to define. It is normal for participants to struggle to understand it broadly and to have differing views. Support participants in sharing and listening to one another, and make sure dialogue remains respectful and inclusive.

Circle ‘Sex’ in ‘Sexuality’

Ask

- How much of our Word Web is about ‘having sex’ or ‘sex’ as a physical behavior?

Share

- Sexuality is more than physical behavior.

Add

- Besides physical behavior, what else do you think could be part of a person’s sexuality?

If participants do not identify in the following, add

- Sexual and reproductive anatomy
- Body Image
- Biological sex
- Gender Including gender identity, gender expression and gender roles
- Sexual orientation
- Desires, pleasure, intimacy and reproduction
- Beliefs, attitudes and values about sexuality

Share

- Sexuality can include some or all these things.
- Sexuality is a personal experience and will be different for everyone.

- LAM-HW-F1, Facilitator Resource, “Frequently Asked Questions,” page 148:

“Why would someone with a penis not identify as a boy/man? Why would someone with a vulva not identify as a girl/woman?”

When we use body parts to describe people, we’re talking about ‘biological sex,’ or sex assigned at birth, which is different than gender. Gender is how people identify and express themselves. Transgender people are people whose gender identity is different from their biological sex or sex assigned at birth. Gender non-conforming and non-binary people are people whose gender identities are not exclusively either boy/man or girl/woman. However someone identifies, they should feel safe, respected and included in TOP.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress.

Arizona Health Department’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs the Arizona Health Department to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute; we are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Shakira Williams, shakira.williams@acf.hhs.gov.

The Arizona Health Department is directed to remove these and all similar language throughout their curricula and program materials. Should Arizona fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large initial 'A'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Minna Castillo Cohen
Colorado Department of Human Services
1575 Sherman Street
Denver, CO 80203

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301COPREP), 2024 (#2401COPREP), and 2025(#2501COPREP).

Dear Ms. Cohen:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Colorado provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Colorado's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Colorado's PREP curricula and program materials:¹

All 4 You 2, 2nd Edition, Facilitator Manual

¹ ACF initiated a medical accuracy review to determine if Colorado's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Colorado will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

- Page 128 (Lesson 6, Activity 6.5): “Educator Note: Over the course of the roleplay activities, students will be in a position where they must roleplay sexual pressure situations with classmates of both a different and the same gender. This may be awkward for teens who are sensitive to the suggestion of same-sex romance, for teens who identify as gay or lesbian, or for teens who are transgender or gender nonconforming. It’s important to address this situation directly and proactively.”

Be Proud Be Responsible! 5th Edition, Facilitator Manual

- Page 15: “Demonstrate acceptance and respect for all participants, regardless of personal characteristics, including race, cultural background, religion, social class, sexual orientation or gender identity.”
- Page 20: “In addition, during the roleplay practice, participants may roleplay sexual pressure situations with someone of a different or the same gender. This may be awkward for straight teens who are sensitive to the suggestion of same-sex romance, for teens who identify as gay or lesbian, or for teens who are transgender or gender nonconforming. It’s important to address this situation directly and proactively.”

Draw the Line/Respect the Line, 2nd Edition, Facilitator Manual, Grades 6-8

- Page 6: “While some young people may feel more comfortable or be able to be more honest when discussing sexuality-related issues in single-gender groups, we do not recommend dividing the class in this way, as it can cause trauma for transgender, gender non-conforming, and non-binary youth.

The use of integrated, mixed-gender groups is considered best practice for current-day classrooms and youth groups, * and is something sexuality educators are trained to facilitate. Use of mixed-gender groups can help promote gender equity, build understanding of different perspectives, and increase inclusivity for transgender, gender nonconforming, and non-binary youth.”

- Page 59, Lesson 1, Teacher’s Note:

“During the roleplay practice, youth may roleplay pressure situations with a partner of a different or the same gender. This may be awkward for teens who are sensitive to the suggestion of same-sex romance, for teens who identify as gay or lesbian, or for teens who are transgender or gender nonconforming. It’s important to address this situation directly and proactively. Here are some tips:

Explain the situation in a matter-of-fact way. Let youth know that they may be doing the roleplays with a partner of a different or the same gender.”

Making Proud Choices, 5th Edition, Facilitator Manual

- Page 36 (Module 1, Activity B, Facilitator's Note): "Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus "outing" themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don't always line up with what observers might expect based on a person's perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group."
- Page 39-40 (Module 1, Activity C Procedure): "**Respect diversity:** Let's keep in mind that there's diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren't even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other's may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

Young people may express themselves in ways that don't conform with their biological sex. There are many ways that youth can express their gender identity. . .

Define terms related to diversity as needed.

I want to be sure everyone understands some of the terms we use when talking about diversity.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples' inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn't fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics."

The "purpose" of a PREP grant award is for states to "carry out personal responsibility education programs consistent with this subsection." 42 U.S.C. § 713(b)(1). The statute defines PREP as "a program that is designed to educate adolescents on -- (i) both

abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. Colorado’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Colorado to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Colorado is directed to remove these and all similar language throughout their curricula and program materials. Should Colorado fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Arlisa Britt at arlisa.britt@acf.hhs.gov.

(allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Mr. Marc Camardo, State PREP Coordinator
Connecticut Department of Public Health
401 Capital Avenue, MS #111MAT
Hartford, CT 06134

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301CTPREP), 2024 (#2401CTPREP), and 2025 (#2501CTPREP).

Dear Connecticut Department of Public Health:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Connecticut provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Connecticut's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Connecticut's PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if Connecticut's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Connecticut will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Making Proud Choices! 5th Edition, Facilitator Guide

- Page 36: “Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus ‘outing’ themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”
- Page 39: “**Respect diversity:** Let’s keep in mind that there’s diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren’t even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other’s may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender. All of these differences make us unique. Regardless of how you see yourself, your background, previous relationships or experience, each of you has a place in this group. This will be a safe space for everyone.”
- Page 39-40: “**Gender** refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples’ inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn’t fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics.”

Be Proud Be Responsible! 5th Edition Facilitator Guide

- Page 15: “Demonstrate acceptance and respect for all participants, regardless of personal characteristics, including race, cultural background, religion, social class, sexual orientation or gender identity.”
- Page 20: “In addition, during the roleplay practice, participants may roleplay sexual pressure situations with someone of a different or the same gender. This

may be awkward for straight teens who are sensitive to the suggestion of same-sex romance, for teens who identify as gay or lesbian, or for teens who are transgender or gender nonconforming. It's important to address this situation directly and proactively.

Here are some tips:

- Explain the situation in a matter-of-fact way. Let participants know that they may be doing the roleplays with someone of a different or the same gender.
- Emphasize that they are playing roles. Doing the roleplay to practice the skill doesn't say anything about the sexual orientation of the people doing the roleplay or mean that anyone is expressing a real-life attraction toward the other person in the roleplay.
- Explain that they need to take their roles seriously because teens of all sexual orientations and gender identities need to learn how to resist sexual pressure and negotiate condom use to protect themselves. This will help ensure that they all get the most out of the roleplay activities."

Reducing the Risk, 5th Edition, Facilitator Guide

- Page 14: "Be sure your reading of the roleplay allows for inclusivity and does not reinforce one view of gender identity or gender stereotypes. You can do this by introducing Lee and Lee as a couple without specifying their genders, by not differentiating the two Lees' lines using stereotypical male and female voices, and by leaving it open as to which Lee is pressuring and which does not want to have sex."
- Page 71: "Over the course of the roleplay activities, students will be in a position where they must roleplay sexual pressure situations with classmates of both a different and the same gender. This may be awkward for teens who are sensitive to the suggestion of same-sex romance, for teens who identify as gay or lesbian, or for teens who are transgender or gender nonconforming. It's important to address this situation directly and proactively.

Here are some tips:

- Explain the situation in a matter-of-fact way. Let students know that every student in the class will, at some point, be doing a roleplay with a classmate of a different gender and with a classmate of the same gender. Most likely, they will do this several times."

The "purpose" of a PREP grant award is for states to "carry out personal responsibility education programs consistent with this subsection." 42 U.S.C. § 713(b)(1). The statute defines PREP as "a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B);

and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. Connecticut’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Connecticut to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Connecticut is directed to remove these and all similar language throughout their curricula and program materials. Should Connecticut fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Chéri Thompson at Cheri.Thompson@acf.hhs.gov.

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Mariel Edge
District of Columbia Department of Health
899 North Capitol St. NE, 5th Floor
Washington, DC 20002

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2101DCPREP), 2024 (#2201DCPREP), and 2025 (#2301DCPREP).

Dear Ms. Edge:

On April 14, 2025, the Administration for Children and Families (ACF) requested that District of Columbia provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing District of Columbia's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from District of Columbia's PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if District of Columbia's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, District of Columbia will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Sexual Wellness Advocacy by Teens (SWAT, 2011)

- Module 2, Facilitator Guide, Page 1: “Learning Objectives: By the end of the workshop, participants will be able to . . .
 - Define what each of the letters in the acronym LGBTQIA+ stand for
 - Distinguish between terms used for gender and sexual orientation
 - Name the different kinds of discriminations and barriers in health care experienced by LGBTQIA+ youth.
 - Challenge homophobia, biphobia and transphobia.
 - Advocate and become an ally to the LGBTQIA+ community.”
- Pages 2-3 (Under activity “Discrimination LBGTQIA+ people experience”): “Mention that there are 20 states where there are no explicit laws against discrimination based on sexual orientation or gender identity in state law. This means, for example, you can be fired if you are part of the LGBTQIA+ community. Which states do you think they are?”

- Module 2, PowerPoint Slides:

“Transgender: term of gender identity for a person whose gender identity does not correspond with their gender assigned at birth. Trans people can be straight, gay, bisexual, queer, or any other sexual orientation.

Queer: encompassing term for people who do not conform to heterosexual norms of sexuality or gender. . . .

Pansexual: attraction towards people regardless of their sex or gender identity.

Cisgender: the term of gender identity for a person whose gender identity corresponds with their gender assigned at birth. Cis people can be straight, gay, bisexual, queer or any other sexual orientation.

Non-binary/genderqueer: Someone who does not fit into conventional gender distinction and identifies with neither, both, or a combo of male and female genders. Gender expansive: people who feel that they exist between genders, as on a spectrum, or beyond the notion of the man/woman binary.

ALLY: A person who fights for the rights of a disadvantage group they are not a part of. For example, an ally can support:

- equal civil rights
- gender equality
- LGBTQ+ social movements
- challenges homophobia, biphobia, and transphobia

Stigmas (unconscious and conscious) against people who identify as queer-- specifically gay/lesbian, bisexual, and trans.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B);

and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. District of Columbia’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs District of Columbia to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ District of Columbia is directed to remove these and all similar language throughout their curricula and program materials. Should District of Columbia fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Ricky Richard at ricky.richard@acf.hhs.gov.

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Mr. Steve Blessings, Director
Delaware Health and Social Services
417 Federal Street
Dover, DE 19901

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2302DEPREP), 2024 (#2402DEPREP), and 2025 (#2502DEPREP).

Dear Delaware Health and Social Services:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Delaware provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Delaware's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Delaware's PREP curricula and program materials.¹

Making Proud Choices! 5th Edition, Facilitator Curriculum

- Page 36 (Module 1, Activity B Procedure, Facilitator's Note): "Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is

¹ ACF initiated a medical accuracy review to determine if Delaware's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Delaware will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

optional; some youth may not feel comfortable sharing their pronouns and thus “outing” themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”

- Page 39-40 (Module 1, Activity C Procedure): **“Respect diversity:** Let’s keep in mind that there’s diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren’t even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other’s may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

Young people may express themselves in ways that don’t conform with their biological sex. There are many ways that youth can express their gender identity. .

..

Define terms related to diversity as needed.

I want to be sure everyone understands some of the terms we use when talking about diversity.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples’ inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn’t fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics.”

LGBT+ Inclusion APS for Middle School

- Slide 7: “‘Sex assigned at birth’ is the **label a doctor gives to a baby when it is born. Sex assigned at birth is about the private parts (genitals) we are born with—it doesn’t consider how we feel inside about our gender.**”

- Slide 9: “Transgender or ‘trans’
 - Sometimes, a person’s inner feelings about their gender doesn’t match their body parts.
 - For example, they have a penis, and know, ‘I’m female.’
 - This is called ‘transgender’ or just ‘trans.’
 - Sometimes a person’s gender feels fluid and changing. They might call themselves ‘non-binary.’”

Be Proud Be Responsible! 5th Edition Facilitator Curriculum

- Page 15 (Facilitator Information): “Demonstrate acceptance and respect for all participants, regardless of personal characteristics, including race, cultural background, religion, social class, sexual orientation or gender identity.”
- Page 20 (Teaching Strategies): “In addition, during the roleplay practice, participants may roleplay sexual pressure situations with someone of a different or the same gender. This may be awkward for straight teens who are sensitive to the suggestion of same-sex romance, for teens who identify as gay or lesbian, or for teens who are transgender or gender nonconforming. It’s important to address this situation directly and proactively.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress. Delaware's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Delaware to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Delaware is directed to remove these and all similar language throughout their curricula and program materials. Should Delaware fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer Chéri Thompson at Cheri.Thompson@acf.hhs.gov.



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Erika Dennis
Georgia Human Resources, Division of Family and Children Services
2 Peachtree Street, 26th Floor
Atlanta, GA 30303

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023
(#1601GAPREP), 2024 (#1601GAPREP), and 2025 (#1601GAPREP)

Dear Ms. Dennis:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Georgia provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Georgia's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Georgia's PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if Georgia's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Georgia will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Making Proud Choices! 5th Edition, Facilitator Curriculum

- Page 36 (Module 1, Activity B Procedure, Facilitator's Note: "Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus "outing" themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don't always line up with what observers might expect based on a person's perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.")
- Pages 39-40: (Module 1, Activity C Procedure): "**Respect Diversity:** Let's keep in mind that there's diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren't even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other's may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

Young people may express themselves in ways that don't conform with their biological sex. There are many ways that youth can express their gender identity. .
..

Define terms related to diversity as needed.

I want to be sure everyone understands some of the terms we use when talking about diversity.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples' inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn't fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics."

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. Georgia’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Georgia to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Georgia is directed to remove these and

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Wendy Jefferson at wendy.jefferson@acf.hhs.gov.

all similar language throughout their curricula and program materials. Should Georgia fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Kenneth Swanson
Guam Department of Education
500 Mariner Ave.
Barrigada, GU 96913

RE: Personal Responsibility Education Program grants for Fiscal Years 2023 (2301GUPREP), 2024 (2402GUPREP), and 2025 (2502GUPREP).

Dear Guam Department of Education:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Guam provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing the territory's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from your PREP curricula and program materials:¹

Making Proud Choices! 5th Edition, Curriculum

- Page 36 (Module 1, Activity B Procedure, Facilitator's Note): "Asking participants to tell you their pronouns is a way of creating a safe space for

¹ ACF initiated a medical accuracy review to determine if Guam's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, your territory will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus “outing” themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”

- Pages 39-40 (Module 1, Activity C Procedure): “**Respect diversity:** Let’s keep in mind that there’s diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren’t even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other’s may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

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Define terms related to diversity as needed.

‘I want to be sure everyone understands some of the terms we use when talking about diversity.’

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples’ inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn’t fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics.”

The “purpose” of a PREP grant award is for states and territories to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the

requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. The commonwealth’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Guam to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged in this letter provides examples of gender ideology content that does not adhere to the PREP statute; we are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Cheri Thompson at cheri.thompson@acf.hhs.com.

Guam is directed to remove these and all similar language throughout their curricula and program materials. Should Guam fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Mr. Matthew Shim, Chief
Hawaii State Department of Health
1250 Punchbowl
Honolulu, HI 96813

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2302HIPREP), 2024 (#2402HIPREP), and 2025 (#2502HIPREP).

Dear Mr. Shim:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Hawaii provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Hawaii's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Hawaii's PREP curricula and program materials:¹

Teen Outreach Program (TOP) Curriculum, Second Edition

- LAM-SU-A2, "Defining Sexuality," page 80: "Facilitator Tip: Sexuality is complex and can be difficult to define. It is normal for participants to struggle to

¹ ACF initiated a medical accuracy review to determine if Hawaii's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Hawaii will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

understand it broadly and to have different views. Support participants in sharing and listening to one another, and make sure dialogue remains respectful and inclusive.

Circle ‘Sex in ‘Sexuality.’

Ask

- How much of our Word Web is about ‘having sex’ or ‘sex as a physical behavior’?

Share

- Sexuality is more than physical behavior.

Ask

- Besides physical behavior, what else do you think could be part of a person’s sexuality?

If participants do not identify in the following, add

- Sexual and reproductive anatomy
 - Body Image
 - Biological sex
 - Gender including gender identity, gender expression and gender roles
 - Sexual orientation
 - Desires, pleasure, intimacy and reproduction
 - Beliefs, attitudes and values about sexuality”
- LAM-SI-F1, “This Is Me. Who Are You?” page 94: “Our identity, or how we see ourselves, includes many different things, such as our race/ethnicity, nationality, culture, religious affiliation, age, gender, sexuality, roles (Ex: athlete, big sister, etc.), personality traits and interests.”
 - LAM-HW-F1, Facilitator Resource, “Frequently Asked Questions,” page 148: **“Why would someone with a penis not identify as a boy/man? Why would someone with a vulva not identify as a girl/woman?”**
When we use body parts to describe people, we’re talking about ‘biological sex,’ or sex assigned at birth, which is different than gender. Gender is how people identify and express themselves. Transgender people are people whose gender identity is different from their biological sex or sex assigned at birth. Gender non-conforming and non-binary people are people whose gender identities are not exclusively either boy/man or girl/woman. However someone identifies, they should feel safe, respected and included in TOP.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted

infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. Hawaii’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Hawaii to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Hawaii is directed to remove these and all similar language throughout their curricula and program materials. Should Hawaii fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Chéri Thompson at Cheri.Thompson@acf.hhs.gov.

withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Mary White
Illinois Dept. of Human Services
10 South Grand Avenue East, 3rd Floor
Springfield, IL 62762

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301ILPREP), 2024 (#2401ILPREP), and 2025 (#2501ILPREP).

Dear Ms. White:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Illinois provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Illinois' PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Illinois' PREP curricula and program materials:¹

Making Proud Choices! 5th Edition, Teacher Manual

- Page 36 (Module 1, Activity B Procedure, Facilitator's Note): "Asking participants to tell you their pronouns is a way of creating a safe space for

¹ ACF initiated a medical accuracy review to determine if Illinois' approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Illinois will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus ‘outing’ themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”

- Pages 39-40 (Module 1, Activity C Procedure): “**Respect diversity:** Let’s keep in mind that there’s diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren’t even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other’s may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

Young people may express themselves in ways that don’t conform with their biological sex. There are many ways that youth can express their gender identity. . .

Define terms related to diversity as needed.

I want to be sure everyone understands some of the terms we use when talking about diversity.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples’ inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn’t fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B);

and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. Illinois’ current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Illinois to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Illinois is directed to remove these and all similar language throughout their curricula and program materials. Should Illinois fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Megan Hill at MeGan.Hill@acf.hhs.gov.

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink, reading "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Mr. Ken Sharp
Iowa Department of Public Health
Lucas State Office Building
321 E 12th Street
Des Moines, IA 50319

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301IAPREP), 2024 (#2401APPREP), and 2025 (2501IAPREP).

Dear Iowa Department of Public Health:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Iowa provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Iowa's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Iowa's PREP curricula and program materials:¹

Teen Outreach Program (TOP), Second Edition, Facilitator Manual

- LAM-SU-A2, "Defining Sexuality," page 80: "Facilitator Tip: Sexuality is complex and can be difficult to define. It is normal for participants to struggle to

¹ ACF initiated a medical accuracy review to determine if Iowa's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Iowa will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

understand it broadly and to have different views. Support participants in sharing and listening to one another, and make sure dialogue remains respectful and inclusive.

Circle ‘Sex’ in ‘Sexuality.’

Ask

- How much of our Word Web is about ‘having sex’ or ‘sex’ as physical behavior?

Share

- Sexuality is more than physical behavior.

Ask (add response to Word Web)

- Besides physical behavior, what else do you think could be part of a person’s sexuality? If participants do not identify in the following, add
 - Sexual and reproductive anatomy
 - Body image
 - Biological sex
 - Gender including gender identity, gender expression and gender roles
 - Sexual orientation
 - Desires, pleasure, intimacy and reproduction
 - Beliefs, attitudes and values about sexuality”
- LAM-SI-F1, “This Is Me. Who Are You?” page 94: “Our identity, or how we see ourselves, includes many different things, such as our race/ethnicity, nationality, culture, religious affiliation, age, gender, sexuality, roles (Ex: athlete, big sister, etc.), personality traits and interests.”
- LAM-HW-F1, Facilitator Resource, “Frequently Asked Questions,” page 148:

“Why would someone with a penis not identify as a boy/man? Why would someone with a vulva not identify as a girl/woman?”

When we use body parts to describe people, we’re talking about ‘biological sex,’ or sex assigned at birth, which is different than gender. Gender is how people identify and express themselves. Transgender people are people whose gender identity is different from their biological sex or sex assigned at birth. Gender non-conforming and non-binary people are people whose gender identities are not exclusively either boy/man or girl/woman. However someone identifies, they should feel safe, respected and included in TOP.”

Wise Guys: Healthy Relationships Curriculum (2021), Facilitator Manual

- Introduction to Level I, page 6: “LGBTQ Inclusive Language: Wise Guys Educators should use language in the classroom that includes and affirms LGBTQ students’ identities and experiences. Additionally, it’s important to separate gender identity from body parts; in other words, someone who identifies as

female may have a penis and someone who identifies as male may have a vagina; someone may not identify as male or female. The use of gender-neutral language when discussing anatomy and physiology helps to ensure that transgender or gender non-conforming students are respected, included and gain an understanding of their bodies too.”

Page 7: “The new phrasing is inclusive of gender and body diversity; it does not assume all females have vaginas and all males have penises and acknowledges that some people’s genders are non-binary, and they may not identify as male OR female.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. Iowa’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

Therefore, ACF instructs Iowa to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute; we are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Arlisa Britt at arlisa.britt@acf.hhs.gov.

Iowa is directed to remove these and all similar language throughout their curricula and program materials. Should Iowa fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Jan Bright
Kentucky Cabinet for Health and Families
275 East Main Street, HS1WF
Frankfort, KY 40621

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#1601KYPREP), 2024 (#1601KYPREP,) and 2025 (#1601KYPREP)

Dear Ms. Bright:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Kentucky provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Kentucky's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Kentucky's PREP curricula and program materials:¹

Teen Outreach Program (TOP) Curriculum

- LAM-SU-A2, "Defining Sexuality," page 80: "Facilitator Tip: Sexuality is complex and can be difficult to define. It is normal for participants to struggle to

¹ ACF initiated a medical accuracy review to determine if Kentucky's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Kentucky will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

understand it broadly and to have different views. Support participants in sharing and listening to one another, and make sure dialogue remains respectful and inclusive.

Circle ‘Sex’ in ‘Sexuality.’

Ask

- How much of our Word Web is about ‘having sex’ or ‘sex’ as physical behavior?

Share

- Sexuality is more than physical behavior

Add

- Besides physical behavior, what else do you think could be part of a person’s sexuality?

If participants do not identify in the following, add

- Sexual and reproductive anatomy
- Body Image
- Biological sex
- Gender Including gender identity, gender expression and gender roles
- Sexual orientation
- Desires, pleasure, intimacy and reproduction
- Beliefs, attitudes and values about sexuality”

- LAM-SI-F1, “This Is Me. Who Are You?” page 94: “Our identity, or how we see ourselves, includes many different things, such as our race/ethnicity, nationality, culture, religious affiliation, age, gender, sexuality, roles (Ex: athlete, big sister, etc.), personality traits and interests.”

- LAM-HW-F1, Facilitator Resource, “Frequently Asked Questions,” page 148: **“Why would someone with a penis not identify as a boy/man? Why would someone with a vulva not identify as a girl/woman?”**

When we use body parts to describe people, we’re talking about ‘biological sex,’ or sex assigned at birth, which is different than gender. Gender is how people identify and express themselves. Transgender people are people whose gender identity is different from their biological sex or sex assigned at birth. Gender non-conforming and non-binary people are people whose gender identities are not exclusively either boy/man or girl/woman. However someone identifies, they should feel safe, respected and included in TOP.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted

infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. Kentucky’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Kentucky to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Kentucky is directed to remove these and all similar language throughout their curricula and program materials. Should Kentucky fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Wendy Jefferson at wendy.jefferson@acf.hhs.gov.

(allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive, slightly slanted style.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Mr. Samuel Burgess
Louisiana Office of Public Health, HIV/AIDS Program
1450 Poydras Street, Suite 2136
New Orleans, LA 70112

RE: State Personal Responsibility Education Program for Fiscal Years 2023 (#2301LAPREP), 2024 (#2401LAPREP), and 2025 (#2501LAPREP).

Dear Mr. Burgess:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Louisiana provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Louisiana's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Louisiana's PREP curricula and program materials:¹

Making Proud Choices! Facilitator Manual, 5th Edition

- Page 36 (Module 1, Activity B Procedure): "Facilitator's Note: Asking participants to tell you their pronouns is a way of creating a safe space for

¹ ACF initiated a medical accuracy review to determine if Louisiana's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Louisiana will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus ‘outing’ themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”

- Pages 39-40 (Module 1, Activity C Procedure): “**Respect diversity:** Let’s keep in mind that there’s diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren’t even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other’s may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

Young people may express themselves in ways that don’t conform with their biological sex. There are many ways that youth can express their gender identity. . .

Define terms related to diversity as needed.

I want to be sure everyone understands some of the terms we use when talking about diversity.

- **Gender** refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.
- **Gender identity** is peoples’ inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn’t fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.
- **Gender expression** is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics.”

Wise Guy: Healthy Relationship Curriculum (2021)

- Introduction to Level I, page 6: “**LGBTQ Inclusive Language:** Wise Guys Educators should use language in the classroom that includes and affirms LGBTQ students’ identities and experiences. Additionally, it’s important to separate

gender identity from body parts; in other words, someone who identifies as female may have a penis and someone who identifies as male may have a vagina; someone may not identify as male or female. The use of gender-neutral language when discussing anatomy and physiology helps to ensure that transgender or gender non-conforming students are respected, included and gain an understanding of their bodies too.”

Page 7: “The new phrasing is inclusive of gender and body diversity; it does not assume all females have vaginas and all males have penises and acknowledges that some people’s genders are non-binary, and they may not identify as male OR female.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. Louisiana’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

Therefore, ACF instructs Louisiana to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Louisiana is directed to remove these and all similar language throughout their curricula and program materials. Should Louisiana fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Tecia Sellers at tecia.sellers@acf.hhs.gov.



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Bethany Hamm, Deputy Commissioner, DHHS
State of Maine Department of Health and Human Services
221 State Street
Augusta, ME 04330

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301MEPREP), 2024 (#2401MEPREP), and 2025 (#2501MEPREP)

Dear State of Maine Department of Health and Human Services:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Maine provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Maine's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Maine's PREP curricula and program materials:¹

Making Proud Choices! 5th Edition, California Edition, Teacher Manual

- Page 279: "Transgender refers to a person's gender identity. Gender identity is your inner sense of your gender—Do you feel like a guy? Do you feel like a girl?"

¹ ACF initiated a medical accuracy review to determine if Maine's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Maine will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Do you feel like something different than a guy or a girl? Often gender identity matches a person's body— someone with a girl's body feels like a girl on the inside or someone with a boy's body feels like a boy on the inside—but not always. Transgender is when a person's inner feelings about gender identity don't match the body."

- Pages 353-54:

"CISGENDER: A term for people who identify as or feel themselves to be the gender that matches the sex they were assigned at birth.

GENDER EXPRESSION: How a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics.

GENDER IDENTITY: Peoples' inner understanding of what gender they identify with. It may be male, female, something in between, or something that doesn't fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person."

Sexuality for All Abilities, 2nd Edition, Instructor Manual

- Page 97, chapter on gender: "Key Messages:
 - Gender is how you feel. Some people identify as she, he or they. Some people have other ways of identifying.
 - Sometimes a person's gender identity doesn't match the gender that caregivers assign them.
 - Sometimes a person's gender expression also doesn't match their assigned gender.
 - In our society, we have stereotypes of what it means to be a man or a woman. Many people do not fit into this stereotype because we are all different, and that is okay."
- Glossary of Terms, page 133:

"GENDER– A word that refers to how a person feels on the inside in regards to being male, female or a different gender.

GENDER EXPRESSION– How a person represents or expresses their identity to the world. Sometimes this matches their assigned sex, sometimes not.

GENDER FLUIDITY– The flexibility of gender expressions and identities that may change over time or even from day to day. A gender fluid person may feel male on some days, female on others, both male and female, or neither. A gender fluid person might also identify as genderqueer.

GENDER IDENTITY– How a person identifies gender inside of themselves. Sometimes this matches their assigned sex, sometimes not.

GENDER NONCONFORMING– When a person’s gender expression doesn’t fit inside traditional male or female categories (sometimes called the gender binary).

GENDERQUEER– A term for people who don’t identify as a man or a woman or whose identity lies outside the traditional gender binary of male and female. Some people use genderqueer, gender non-conforming, and non-binary interchangeably, but others don’t. Genderqueer has a political history, so many use the term to identify their gender as non-normative in some way. For example, someone could identify as both cisgender female and gender queer.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. Maine’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Maine to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Maine is directed to remove these and all similar language throughout their curricula and program materials. Should Maine fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Chéri Thompson at Cheri.Thompson@acf.hhs.gov.



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Shelly Choo, Director
Maryland Department of Health and Mental Hygiene
201 West Preston Street, 5th Floor
Baltimore, MD 21201

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301MDPREP), 2024 (#2401MDPREP), and 2025 (#2501MDPREP).

Dear Maryland Department of Health and Mental Hygiene:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Maryland provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Maryland's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Maryland's PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if Maryland's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Maryland will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Rights, Respect, Responsibility, Lesson Plan (Updated 2023)

- Pages 8, 19, 26, 32, 57, & 78: “A NOTE ABOUT LANGUAGE: Language is really important and we’ve intentionally been very careful about our language throughout this curriculum. You may notice language throughout the curriculum that seems less familiar- using the pronoun ‘they’ instead of ‘her’ or ‘him,’ using gender neutral names in scenarios and role-plays and referring to ‘someone with a vulva’ vs. a girl or woman. This is intended to make the curriculum inclusive of all genders and gender identities. You will need to determine for yourself how much and how often you can do this in your own school and classroom and should make adjustments accordingly.”
- Pages 39-40 (bolded content denotes gender ideology): “Sexual Orientation: Myth or Fact? You can change your BEHAVIORS, **you can change your IDENTITY** – but you can’t change your ORIENTATION, or how you feel. Feelings of attraction are discovered, not chosen. It isn’t something a person can turn on and off like a light switch. We don’t choose who we are attracted to. Now, sometimes we can discover new feelings of attraction – **for example, always being attracted to one gender, and then finding someone or others of a different gender attractive later in life.** That is different from sitting down and trying to change the way you feel – or from going to therapy or to church to try to influence your feelings. It doesn’t work, and can end up doing real psychological and emotional harm.”
- Power Point, page 44 (bolded content denotes gender ideology): “What is ‘Sexual Orientation’?
 - **The gender(s) of the people to whom we are attracted, physically and romantically.**
 - **Can include more than one gender.**
 - Includes love: can know one’s orientation without necessarily doing something sexual with another person.”
- Power Point, page 46 (bolded content denotes gender ideology):
 - “Orientation–Who we’re attracted to
 - Behavior–How we behave sexually
 - **Identity–What we call ourselves”**

Making Proud Choices, 5th Edition, Facilitator’s Guide

- Page 36 (Module 1, Activity B Procedure: “Facilitator’s Note: Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus “outing” themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or

zir. Pronouns don't always line up with what observers might expect based on a person's perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group."

Pages 39-40 (Activity C Procedure): "**Respect diversity:** Let's keep in mind that there's diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren't even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other's may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

Young people may express themselves in ways that don't conform with their biological sex. There are many ways that youth can express their gender identity. .

..

Define terms related to diversity as needed.

I want to be sure everyone understands some of the terms we use when talking about diversity.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples' inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn't fit these labels. It may be the same as (cisgender) or different from(transgender)the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics."

The "purpose" of a PREP grant award is for states to "carry out personal responsibility education programs consistent with this subsection." 42 U.S.C. § 713(b)(1). The statute defines PREP as "a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C)." 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects

described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress.

Maryland's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Maryland to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Maryland is directed to remove these and all similar language throughout their curricula and program materials. Should Maryland fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60)

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: "(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management."

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Chéri Thompson at Cheri.Thompson@acf.hhs.gov.

days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink, reading "Andrew K. Gradison". The signature is written in a cursive style with a large initial 'A'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Jill Clark
Massachusetts Department of Public Health
250 Washington Street
Boston, MA 02108

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (2301MAPREP), 2024 (#2401MAPREP), and 2025 (#2501MAPREP).

Dear Ms. Clark:

On April 14, 2025, the Administration for Children and Families (ACF) requested that the Commonwealth of Massachusetts provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Massachusetts's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Massachusetts's PREP curricula and program materials:¹

Making Proud Choices! 5th edition

- Page 36: "Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns

¹ ACF initiated a medical accuracy review to determine if Massachusetts's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Massachusetts will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

and thus “outing” themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”

- Pages 39-40: “**Gender** refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples’ inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn’t fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics.”

Rights, Respect, Responsibilities (the 3Rs), Middle School Curriculum

- Pages 2-3: “Being Respectful about Gender Identity: Pronouns and Practice!”

A NOTE ABOUT LANGUAGE:

Language is extremely important. It is one way you can be explicitly inclusive around often underrepresented and not as commonly acknowledged sexual orientations and gender identities. We’ve intentionally been very thoughtful about our language throughout this curriculum. You may notice language that seems less familiar, for example, using the pronoun ‘they’ instead of ‘her’ or ‘him’, and simply referring to the body parts and processes we are teaching about rather than unnecessarily gendering them. We have also explicitly included scenarios and role plays that use a variety of names typically coded to certain genders, as well as ones that are not as readily coded to assumptions about gender. We have also used a variety of gendered and gender-neutral pronouns and names to be sure we are actively including various gender identities, sexual orientations, and relationships in our activities and discussions. This commitment to inclusiveness across our lessons is aimed at building new habits within our classrooms related to actively and more seamlessly representing a broader range of genders, orientations, and lived experiences.

***NOTE TO THE TEACHER:** Being prepared to teach about gender identity and expression may be new skills for some teachers. Preparation can include checking out some of the links below, talking with colleagues who have taught these topics before, and taking a minute to practice new phrases or use of*

pronouns. You have transgender young people in your classes, you always have! Your preparation to actively acknowledge and include them can be lifesaving!

- **I Think I Might Be Transgender, Advocates for Youth** – Written by transgender youth, this pamphlet provides answers for young people who find that the gender to which they were born, or assigned at birth, does not fit them.
- **Developing LGBTQ-Inclusive Classroom Resources, GLSEN** – Educator guide on creating an inclusive curriculum, responding to anti-LGBTQ behavior and implementing social emotional learning in the classroom.
- **Framework for Gender-Inclusive Schools, Gender Spectrum** – Background on the four entry points for the intentional development of gender-inclusive school settings and resources to approach each.
- **Schools in Transition: A Guide for Supporting Transgender Students in K-12 Schools, ACLU** – Handbook on providing safe environments for transgender high school students that is targeted toward administrators, teachers and parents.
- **Pronoun Guide, GLSEN** – Guide for members of the school community to learn how to use people’s correct pronouns.
- **Gender Support Checklist for Transgender and Non-Binary Students, Welcoming Schools** – Set of questions for educators to confirm they have the answers and resources necessary to best support gender-nonconforming students.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2). The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).²

The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress. Massachusetts' current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Massachusetts to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute; we are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Sierra Baker, sierra.baker@acf.hhs.gov.

Massachusetts is directed to remove these and all similar language throughout their curricula and program materials. Should Massachusetts fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Mr. Dan Lance
Michigan Department of Health and Human Services
235 South Grand Avenue, Suite 800
Lansing, MI 48933

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301MIPREP), 2024 (#2401MIPREP), and 2025 (#2501MIPREP).

Dear Mr. Lance:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Michigan provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Michigan's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Michigan's PREP curricula and program materials:¹

Making Proud Choices! 5th edition

- Page 36 (Module 1, Activity B Procedure): "Facilitator's Note: Asking participants to tell you their pronouns is a way of creating a safe space for

¹ ACF initiated a medical accuracy review to determine if Michigan's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Michigan will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus ‘outing’ themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”

Pages 39-40 (Module 1, Activity C Procedure): “**Respect diversity:** Let’s keep in mind that there’s diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren’t even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other’s may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

Young people may express themselves in ways that don’t conform with their biological sex. There are many ways that youth can express their gender identity. . .

Define terms related to diversity as needed.

I want to be sure everyone understands some of the terms we use when talking about diversity.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples’ inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn’t fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics.”

Teen Outreach Program (TOP), 2nd Edition, Facilitator Manual

- LAM-HW-F1, “Introduction to Reproductive Anatomy,” page 142: “Share:
 - During our discussion today, when we say ‘male’ and ‘female,’ we will be referring to biological sex, or people born with a penis or vulva.
 - Biological sex is different than gender. Gender is how people identify and express themselves.

- However someone identifies and expresses themselves, they should feel safe, respected and included in our TOP club.”
- LAM-HW-F1, Facilitator Resource, “Frequently Asked Questions,” page 148: **“Why would someone with a penis not identify as a boy/man? Why would someone with a vulva not identify as a girl/woman?”**
When we use body parts to describe people, we’re talking about ‘biological sex,’ or sex assigned at birth, which is different than gender. Gender is how people identify and express themselves. Transgender people are people whose gender identity is different from their biological sex or sex assigned at birth. Gender non-conforming and non-binary people are people whose gender identities are not exclusively either boy/man or girl/woman. However someone identifies, they should feel safe, respected and included in TOP.”
- LAM-HW-F6, “Abstinence and Expressing Affection,” page 196: “Share
 - When people think of sexuality, they often just think of sex.
 - However, sex is only one part of sexuality.
 - Sexuality also includes our bodies and how we feel about them, our desires and attractions to others, our relationships, our beliefs and values about sexuality, how we can love and affection and how we identity and express our gender.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress. Michigan's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Michigan to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Michigan is directed to remove these and all similar language throughout their curricula and program materials. Should Michigan fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Nakia Martin-Wright, nakia.martin-wright@acf.hhs.gov.



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Emily McDowell, PREP/SRAE Grant Manager
Minnesota Department of Health
625 Robert Street North
St. Paul, MN 55164

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301MNPREP), 2024 (#2401MNPREP), and 2025 (#2501MNPREP).

Dear Ms. McDowell:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Minnesota provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Minnesota's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Minnesota's PREP curricula and program materials:¹

In Cluded, In-Person Youth Curriculum

- Page 5: "Introductions and Warm-Up: Facilitators introduce themselves, the IN·cluded workshop agenda and Essential Questions, and facilitate participant

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introductions. Participants commit to group agreements to maximize physical, emotional, and psychological safety during the learning experience. The Peer Educators read a welcoming poem depicting diverse sexual and gender identities to create a supportive environment for workshop participants. Participants spend time exploring their IN·clued zines.”

- Page 13: “Gather everybody’s attention and thank participants for being there. Introduce yourself with your name, pronouns (if you wish), your role, and why you care about LGBTQ+ sexual health. Introduce the purpose of the workshop.

‘We want to thank everybody for taking the time to be here today—we’re really excited to be working with you for the next few hours, and are grateful to be with you in this space. IN·clued is a program just for LGBTQ+ youth to learn about how to get the sexual health information and services they need and have the right to. We know that sometimes lesbian, gay, bisexual, transgender, and queer or questioning young people don’t have access to information and services that is for them. That’s why we’re here, to spend some time together talking about LGBTQ+ sexual healthcare in particular.’”

- Page 24: “It’s not because this is the only way to have sex or the right way to have sex. Sex is often defined this way because our society is heteronormative; meaning that heterosexual/cisgender is considered the norm. It doesn’t usually acknowledge genderqueer, non-binary, intersex, or transgender identities. It also assumes that sex is only for reproduction and leaves out any conversation about pleasure. This biased perspective shapes the messages and information we get about sex in school, from the media, and even from our friends and family. And it often leads to incomplete and inaccurate information. But we know that ‘sex’ is so much more than penis-in-vagina intercourse, and we know there are many more identities out there than heterosexual and cisgender!”

Live IT, Second Edition, Facilitator’s Manual

- Page 22: “Two-spirited people were held in high regard, and they decided which of the female or male societies they joined and were respectfully included in the discussion regardless of gender of the society (i.e. male joining the female society or female joining the male society).

European contact and the US Government interrupted and banned our way of life, our family systems, our clans, our ceremonies, and our societies thereby bringing new ways of talking about and viewing sex, sexuality, and relationships. These topics began to be influenced by religion, shame and guilt. Soon many of our people adopted the religion and left behind the ways of life that insured the development of healthy, balanced human beings. Giving up our way of life was not voluntary. To continue our way of life, our family systems, our clans, our ceremonies, and our societies meant negative governmental consequences that impacted our families and our communities.”

- Page 32: “Settler colonialism is a distinct type of colonialism that functions through the replacement of indigenous populations with an invasive settler society. Settler colonialism ‘destroys to replace.’ Their goal was to gain total control and possession of the land. It is a structural system, not an event in history. In this sense, settler colonialism does not ever ‘end.’ As a result, Indigenous People’s entire societies, lifeways, languages, cultures, and connection to lands were almost completely destroyed. Indigenous life and society was replaced with European lifeways, including heteropatriarchal gender roles. Heteropatriarchal means the dominance by the heterosexual and patriarchy, or, in other words, cisgendered white men. Settler colonialism erased Indigenous lifeways and replaced them with Western Culture, including ways in which we view gender and relationships among humans. Colonization resulted in forced assimilation to heteropatriarchal gender norms that continue to oppress and erase Indigenous Two-Spirit and LGBTQ+ peoples. Tribal communities have been forced to define human relationships based on this heteropatriarchal gender normativity, which has resulted in the oppression of gender and sexual identities that don’t fit this norm.”

Making Proud Choices! 5th Edition, Curriculum Manual

- Page 36 (Module 1, Activity B Procedure): “Facilitator’s Note: Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus “outing” themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”
- Pages 39-40 (Module 1, Activity C Procedure): “**Respect diversity:** Let’s keep in mind that there’s diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren’t even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other’s may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

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I want to be sure everyone understands some of the terms we use when talking about diversity.

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Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics."

Sexuality for All Abilities, 2nd Edition, Instructor Manual

- Page 91: "Key Messages:
 - Gender is how you feel. Some people identify as she, he or they. Some people have other ways of identifying.
 - Sometimes a person's gender identity doesn't match the gender that caregivers assign them.
 - Sometimes a person's gender expression also doesn't match their assigned gender.
 - In our society, we have stereotypes of what it means to be a man or a woman. Many people do not fit into this stereotype because we are all different, and that is okay."

Teen Outreach Program (TOP), 2nd Edition

- LAM SI-F1, "This Is Me. Who Are You?" page 94: "Our identity, or how we see ourselves, includes many different things, such as our race/ethnicity, nationality, culture, religious affiliation, age, gender, sexuality, roles (Ex: athlete, big sister, etc.), personality traits and interests."
- LAM-HW-F1, Facilitator Resource, "Frequently Asked Questions," page 148:

"Why would someone with a penis not identify as a boy/man? Why would someone with a vulva not identify as a girl/woman?"

When we use body parts to describe people, we're talking about "biological sex," or sex assigned at birth, which is different than gender. Gender is how people identify and express themselves. Transgender people are people whose gender identity is different from their biological sex or sex assigned at birth. Gender non-conforming and non-binary people are people whose gender identities are not exclusively either boy/man or girl/woman. However someone identifies, they should feel safe, respected and included in TOP."

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

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Therefore, ACF instructs Minnesota to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Minnesota is directed to remove these

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³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Chéri Thompson at Cheri.Thompson@acf.hhs.gov.

and all similar language throughout their curricula and program materials. Should Minnesota fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large initial 'A'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Mary Currier
Mississippi State Dept. of Health
570 East Woodrow Willson
Jackson, MS 39215

RE: State Personal Responsibility Education Program for Fiscal Years 2023
(#2301MSPREP), 2024 (#2401MSPREP), and 2025 (#2501MSPREP).

Dear Ms. Currier:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Mississippi provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

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¹ ACF initiated a medical accuracy review to determine if Mississippi's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Mississippi will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Draw the Line Respect the Line, Facilitator Manual

- Page 6 (“How to Use the Curriculum”): “While some young people may feel more comfortable or be able to be more honest when discussing sexuality-related issues in single-gender groups, we do not recommend dividing the class in this way, as it can cause trauma for transgender, gender non-conforming, and non-binary youth.

Rather, we suggest building a safe and inclusive environment in which all youth feel affirmed and included in the lessons. The use of integrated, mixed-gender groups is considered best practice for current-day classrooms and youth groups, and is something sexuality educators are trained to facilitate. Use of mixed-gender groups can help promote gender equity, build understanding of different perspectives, and increase inclusivity for transgender, gender nonconforming, and non-binary youth.”

- Page 59 (Activity 4.5, Youth Roleplays): “Teacher Note: During the roleplay practice, youth may roleplay pressure situations with a partner of a different or the same gender. This may be awkward for teens who are sensitive to the suggestion of same-sex romance, for teens who identify as gay or lesbian, or for teens who are transgender or gender nonconforming. It’s important to address this situation directly and proactively.

Here are some tips:

- Explain the situation in a matter-of-fact way. Let youth know that they may be doing the roleplays with a partner of a different or the same gender.”

Making Proud Choices! 5th Edition

- Page 36 (Module 1, Activity B Procedure): “Facilitator Note: Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus ‘outing’ themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”
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others aren't even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other's may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

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Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics."

Reducing the Risk, 5th ed., Curriculum

- Class 4, "Roleplay in Small Groups: Note to the Teacher" page 71: "Over the course of the roleplay activities, students will be in a position where they must roleplay sexual pressure situations with classmates of both a different and the same gender. This may be awkward for teens who are sensitive to the suggestion of same-sex romance, for teens who identify as gay or lesbian, or for teens who are transgender or gender nonconforming. It's important to address this situation directly and proactively. Here are some tips:
 - Explain the situation in a matter-of-fact way. Let students know that every student in the class will, at some point, be doing a roleplay with a classmate of a different gender and with a classmate of the same gender. Most likely, they will do this several times."

The "purpose" of a PREP grant award is for states to "carry out personal responsibility education programs consistent with this subsection." 42 U.S.C. § 713(b)(1). The statute defines PREP as "a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B);

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Sincerely,

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Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Mr. Chad Ridder
Missouri Department of Health and Senior Services
P.O. Box 570
Jefferson City, MO 65102-0570

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023, 2024 and 2025 (#2201MOPREP).

Dear Mr. Ridder:

On April 14, 2025, the Administration for Children and Families (ACF) requested that the Missouri Department of Health & Senior Services provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing the Missouri Department of Health & Senior Services' PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Missouri Department of Health & Senior Services' PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if Missouri Department of Health & Senior Services' approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Missouri Department of Health & Senior Services will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Making Proud Choices! 5th Edition, Facilitator Curriculum

- Page 36 (Module 1, Activity B Procedure, Facilitator's Note): "Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus 'outing' themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don't always line up with what observers might expect based on a person's perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group."
- Pages 39-40 (Module 1, Activity C Procedure): "**Respect diversity:** Let's keep in mind that there's diversity in society and in this group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren't even thinking about it. Some have had sexual intercourse. Some have had sex because they chose to; others may have had sex against their will. Some may identity as male, female or transgender.

Young people may express themselves in ways that don't conform with their biological sex. There are many ways that youth can express their gender identity. . .

Define terms related to diversity as needed.

I want to be sure everyone understands some of the terms we use when talking about diversity.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples' inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn't fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics."

Making Proud Choices! Adaptation for Youth in Out-of-Home-Care, Facilitator curriculum

- Page 50 (Module 1, Activity C, Talking Circle, Facilitator's Note): "Asking participants to tell you their preferred pronouns is a way of creating safe space for any transgender or gender nonconforming youth. Model what you want participants to say by giving your own preferred pronouns. Some transgender youth might prefer typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Preferred pronouns don't always line up with what observers might expect based on a person's perceived biological sex. The simple act of requesting preferred pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group."

Teen Outreach Program (TOP), 2nd Edition, Facilitator Manual

- LAM-HW-F1, "Introduction to Reproductive Anatomy," page 142: "Share:
 - During our discussion today, when we say 'male' and 'female,' we will be referring to biological sex, or people born with a penis or vulva.
 - Biological sex is different than gender. Gender is how people identify and express themselves.
 - However someone identifies and expresses themselves, they should feel safe, respected and included in our TOP club."
- LAM-HW-F1, Facilitator Resource, "Frequently Asked Questions," page 148:

"Why would someone with a penis not identify as a boy/man? Why would someone with a vulva not identify as a girl/woman?"

When we use body parts to describe people, we're talking about 'biological sex,' or sex assigned at birth, which is different than gender. Gender is how people identify and express themselves. Transgender people are people whose gender identity is different from their biological sex or sex assigned at birth. Gender non-conforming and non-binary people are people whose gender identities are not exclusively either boy/man or girl/woman. However someone identifies, they should feel safe, respected and included in TOP."
- LAM-HW-F6, "Abstinence and Expressing Affection," page 196: "Share
 - When people think of sexuality, they often just think of sex.
 - However, sex is only one part of sexuality.
 - Sexuality also includes our bodies and how we feel about them, our desires and attractions to others, our relationships, our beliefs and values about sexuality, how we can love and affection and how we identity and express our gender."

The "purpose" of a PREP grant award is for states to "carry out personal responsibility education programs consistent with this subsection." 42 U.S.C. § 713(b)(1). The statute defines PREP as "a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B);

and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. Missouri Department of Health & Senior Services’ current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs the Missouri Department of Health & Senior Services to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute; we are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Se’an Bournes, Sean.Bournes@acf.hhs.gov.

Missouri Department of Health & Senior Services is directed to remove these and all similar language throughout their curricula and program materials. Should Missouri Department of Health & Senior Services fail to make the appropriate modifications to its

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer, Se'an Bournes at Sean.Bournes@acf.hhs.gov if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive, flowing style.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Darla Dexter, Community Health Section Supervisor
Montana Department of Public Health and Human Services
14 East Broadway, Room A116
Helena, MT 59601

RE: State Personal Responsibility Education Program for Fiscal Years 2023
(#2301MTPREP), 2024 (#2401MTPREP), and 2025 (#2501MTPREP).

Dear Montana Department of Public Health and Human Services:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Montana provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Montana's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Montana's PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if Montana's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Montana will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Draw the Line/Respect the Line

- Page 6 (“How to Use the Curriculum”): “While some young people may feel more comfortable or be able to be more honest when discussing sexuality-related issues in single-gender groups, we do not recommend dividing the class in this way, as it can cause trauma for transgender, gender non-conforming, and non-binary youth. . . .

The use of integrated, mixed-gender groups is considered best practice for current-day classrooms and youth groups, and is something sexuality educators are trained to facilitate. Use of mixed-gender groups can help promote gender equity, build understanding of different perspectives, and increase inclusivity for transgender, gender nonconforming, and non-binary youth.”

- Lesson 1, Activity 4.5 (page 59) and Lesson 4, Activity 4.4 (page 92):

Teacher’s Note

During the roleplay practice, youth may roleplay pressure situations with a partner of a different or the same gender. This may be awkward for teens who are sensitive to the suggestion of same-sex romance, for teens who identify as gay or lesbian, or for teens who are transgender or gender nonconforming. It’s important to address this situation directly and proactively.

Here are some tips:

- Explain the situation in a matter-of-fact way. Let youth know that they may be doing the roleplays with a partner of a different or the same gender.
- Emphasize that they are playing roles. Doing the roleplay to practice the skill doesn’t say anything about the sexual attraction of the people doing the roleplay or mean that anyone is expressing a real-life attraction toward the other person in the roleplay.
- Explain that they need to take their role seriously because teens of all sexual orientations and gender identities need to learn how to draw the line to resist sexual pressure and protect themselves. This will help ensure that they and their classmates get the most out of the roleplay activities.

Making Proud Choices!

- Page 36 (Module 1, Activity B Procedure): “Facilitator’s Note: Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus ‘outing’ themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a

person's perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group."

- Page 39 (Module 1, Activity C Procedure): "**Respect diversity:** Let's keep in mind that there's diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren't even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other's may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

Young people may express themselves in ways that don't conform with their biological sex. There are many ways that youth can express their gender identity. . .

Define terms related to diversity as needed.

I want to be sure everyone understands some of the terms we use when talking about diversity.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples' inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn't fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics."

The "purpose" of a PREP grant award is for states to "carry out personal responsibility education programs consistent with this subsection." 42 U.S.C. § 713(b)(1). The statute defines PREP as "a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C)." 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects

described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress.

Montana's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Montana to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Montana is directed to remove these and all similar language throughout their curricula and program materials. Should Montana fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60)

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: "(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management."

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Arlisa Britt at arlisa.britt@acf.hhs.gov.

days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



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Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Jennifer Severe-Oforah
Nebraska Dept. of Health and Human Services
301 Centennial Mall South
Lincoln, NE 68509

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#1601NEPREP), 2024 (#2301NEPREP), and 2025 (#2301NEPREP).

Dear Ms. Severe-Oforah:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Nebraska provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Nebraska's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Nebraska's PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if Nebraska's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Nebraska will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Teen Outreach Program (TOP), 2nd Edition, Facilitator Manual

- LAM-SU-A2, “Defining Sexuality,” page 80:

“Facilitator Tip: Sexuality is complex and can be difficult to define. It is normal for participants to struggle to understand it broadly and to have differing views. Support participants in sharing and listening to each other, and make sure dialogue remains respectful and inclusive.

Circle ‘Sex’ in ‘Sexuality.’

Ask:

- How much of our Word Web is about ‘having sex’ or ‘sex’ as physical behavior?

Share:

- Sexuality is more than physical behavior.

Ask (add responses to Word Web)

- Besides physical behavior, what else do you think could be part of a person’s sexuality?

If participants do not identify in the following, add

- Sexual and reproductive anatomy
- Body image
- Biological sex
- Gender including gender identity, gender expression and gender roles
- Sexual orientation
- Desires, pleasure, intimacy and reproduction
- Beliefs, attitudes and values about sexuality”

- LAM-HW-F1, Facilitator Resource, “Frequently Asked Questions,” page 147-48:

“Why would someone with a penis not identify as a boy/man? Why would someone with a vulva not identify as a girl/woman?

When we use body parts to describe people, we’re talking about ‘biological sex,’ or sex assigned at birth, which is different than gender. Gender is how people identify and express themselves. Transgender people are people whose gender identity is different from their biological sex or sex assigned at birth. Gender non-conforming and non-binary people are people whose gender identities are not exclusively either boy/man or girl/woman. However someone identifies, they should feel safe, respected and included in TOP.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both

abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. Nebraska’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Nebraska to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Nebraska is directed to remove these and all similar language throughout their curricula and program materials. Should Nebraska fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact Federal Project Officer, Se’an Bournes at sean.bournes@acf.hhs.gov.

(allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Vickie Ives
Nevada State Health Division
4150 Technology Way, Suite 210
Carson City, NV 89706

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301NVPREP), 2024 (#2401NVPREP), and 2025 (#2501NVPREP).

Dear Ms. Ives:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Nevada provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Nevada's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Nevada's PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if Nevada's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Nevada will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

In Clued, 2nd edition, In-Person Youth Curriculum (For Adult Facilitators & Peer Educators), Updated 2024

- Page 5 (Curriculum Overview): “Introductions and Warm-Up (20 minutes)
- Facilitators introduce themselves, the IN·clued workshop agenda and Essential Questions, and facilitate participant introductions. Participants commit to group agreements to maximize physical, emotional, and psychological safety during the learning experience. The Peer Educators read a welcoming poem depicting diverse sexual and gender identities to create a supportive environment for workshop participants. Participants spend time exploring their IN·clued zines.”
- Page 10 (Youth Workshop, Overview): “Call LGBTQ+ youth group facilitator to ask about:
 - Community-specific group language use (e.g. ‘Queer youth,’ ‘LGBTQ+ youth,’ ‘Gender-expansive youth,’ etc.)
 - Group structure (meeting times, locations, number of youth, etc.)
 - Already established group norms/agreements, if they have any
 - Prior activities/experiences the group has had around sexual health education or accessing sexual healthcare
 - Facilities—room set up, A/V equipment, room for breakout groups, etc.
 - Group dynamics that would be useful to know”
 - Page 13 (Youth Workshop, Section 1): “ADULT FACILITATOR: Gather everybody’s attention and thank participants for being there. Introduce yourself with your name, pronouns (if you wish), your role, and why you care about LGBTQ+ sexual health. Introduce the purpose of the workshop.

‘We want to thank everybody for taking the time to be here today—we’re really excited to be working with you for the next few hours, and are grateful to be with you in this space. IN·clued is a program just for LGBTQ+ youth to learn about how to get the sexual health information and services they need and have the right to. We know that sometimes lesbian, gay, bisexual, transgender, and queer or questioning young people don’t have access to information and services that is for them. That’s why we’re here, to spend some time together talking about LGBTQ+ sexual healthcare in particular.’”

- Page 18 (Youth Workshop): “ADULT FACILITATOR: Explain the purpose of the IN·clued zine and how it will be used throughout the workshop.

This is the IN·clued zine. It’s a handy resource that we’ll be using throughout the workshop. This is for you to keep and take home if you want to look at later. For those of you who have never heard of a zine, zines have historically been used by marginalized or oppressed groups as a way to distribute information. They are frequently photocopied in small batches with a focus on raising awareness about important issues. Does anyone know what I mean by marginalized or oppressed?

Sample answer: Being marginalized means being pushed to the side or not being treated fairly because of things like race, gender, or beliefs. Oppression is when someone or institutions treat others unfairly or cruelly, making it hard for them to have the same rights or opportunities.”

- Page 24 (Youth Workshop, Section 2: LGBTQ+ Sexual Health): “It’s not because this is the only way to have sex or the right way to have sex. Sex is often defined this way because our society is heteronormative; meaning that heterosexual/cisgender is considered the norm. It doesn’t usually acknowledge genderqueer, non-binary, intersex, or transgender identities. It also assumes that sex is only for reproduction and leaves out any conversation about pleasure. This biased perspective shapes the messages and information we get about sex in school, from the media, and even from our friends and family. And it often leads to incomplete and inaccurate information. But we know that ‘sex’ is so much more than penis-in-vagina intercourse, and we know there are many more identities out there than heterosexual and cisgender!”
- Page 43 (Youth Workshop, Section 3): “ADULT FACILITATOR: Tell participants what services are available in their community, differentiating between laws for those who are minors/under 18 and those who are 18+. Be sure to include the following: age of consent for sex, access to sexual and reproductive healthcare (including STI testing, birth control, emergency contraception, condoms, PrEP, and abortion), and gender affirming care, (including puberty blockers and hormone therapy).”

Making Proud Choices! 5th Edition, Curriculum

- Page 36 (Module 1, Activity B Procedure, Facilitator’s Note): “Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus “outing” themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”
- Pages 39-40 (Module 1, Activity C Procedure): “**Respect diversity:** Let’s keep in mind that there’s diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren’t even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other’s may have had sex against their will.

Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

Young people may express themselves in ways that don't conform with their biological sex. There are many ways that youth can express their gender identity. . .

Define terms related to diversity as needed.

'I want to be sure everyone understands some of the terms we use when talking about diversity.'

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples' inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn't fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics."

The "purpose" of a PREP grant award is for states to "carry out personal responsibility education programs consistent with this subsection." 42 U.S.C. § 713(b)(1). The statute defines PREP as "a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C)." 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: "(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management."

authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress. Nevada's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Nevada to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Nevada is directed to remove these and all similar language throughout their curricula and program materials. Should Nevada fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families

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ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Nancy Scotto-Rosato
New Jersey Department of Health and Senior Services
50 East State Street, 6th Floor
PO Box 364
Trenton, NJ 08625

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (2301NJPREP), 2024 (2401NJPREP), 2025 (2501NJPREP).

Dear Ms. Scotto-Rosato:

On April 14, 2025, the Administration for Children and Families (ACF) requested that New Jersey provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing New Jersey's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from New Jersey's PREP curricula and program materials:¹

High School FLASH, Third Edition, Educator Manual

- Implementation Toolkit, Page 13: "Sexual orientation and gender identity concepts"

¹ ACF initiated a medical accuracy review to determine if New Jersey's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, New Jersey will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

- Everyone has a sexual orientation and a gender identity.
 - A person knows their sexual orientation because of who they feel attracted to.
 - A person knows their gender identity because they feel like a boy, a girl, both, neither or somewhere in between.
 - People of all sexual orientations and gender identities need to know how to prevent pregnancy and STOs, either for themselves or to help a friend.”
- Implementation Toolkit, Page 14-15: “Teaching about sexual orientation and gender identity creates better understanding and respect among all students and creates a climate where discrimination is unwelcome. It also provides a necessary protection for lesbian, gay, bisexual, trans, and queer (LGBTQ) students. The FLASH curriculum has been shown through rigorous evaluation to significantly reduce homophobia and transphobia among high school students (Kesler et al., 2023). It is important for educators to routinely teach inclusively, as every classroom will likely have students who identify (or will later identify) as LGBTQ, as well as students with family and friends who identify as LGBTQ.”

FLASH

- Lesson 4, Page 4: “1. Let’s start with **assigned sex**.
 - When a baby is born, the doctor usually says the baby is male or female, depending on the appearance of the baby’s genitals. This is the baby’s assigned sex.
 - The assigned sex of babies with a vagina, clitoris, and XX chromosomes is usually female.
 - The assigned sex of babies with a penis, scrotum, and XY chromosomes is usually male.
 - Some babies are born with variations in their genitals, reproductive organs, or chromosomes. This is called intersex. The doctor will usually assign a sex of male or female, although people may identify differently as they get older.

If someone asked you to summarize assigned sex, what would you say? Who is it assigned by? Right, it’s when the doctor says, ‘It’s a boy’ or ‘It’s a girl,’ depending on the baby’s genitals. Good job. Any questions.

2. Let’s move on to gender identity. While assigned sex is based on the body parts the doctor sees at birth, gender identity has nothing to do with body parts.

- Gender identity is a deep feeling people have about whether they are a guy, a girl, both, neither, or somewhere in between.
- People often know their gender identity when they are very little, before they start kindergarten, although everyone is different and some people will know when they are younger or older.

- Cisgender is when a person's gender identity is the same as their assigned sex. For example, a doctor says, 'It's a girl!' at a baby's birth, and that child later feels 'Yes, I am a girl.'
- Transgender is when a person's gender identity is not the same as their assigned sex. For example, a doctor says, 'It's a girl!' at a baby's birth, and that child later feels 'No, I'm not a girl.' People may also identify as nonbinary, genderqueer, or some other gender identity.

So how is gender identity different than assigned sex? Correct, gender identity is based on a deep feeling that a person has about themselves."

Teen Outreach Program (TOP), 2nd Edition, Curriculum

- LAM-SU-A2, "Defining Sexuality," page 80: **"Facilitator Tip:** Sexuality is complex and can be difficult to define. It is normal for participants to struggle to understand it broadly and to have differing views. Support participants in sharing and listening to one another, and make sure dialogue remains respectful and inclusive.

Circle 'Sex' in 'Sexuality.'

Ask

- How much of our Word Web is about 'having sex' or 'sex' as physical behavior?

Share

- Sexuality is more than physical behavior.

Ask

- Besides physical behavior, what else do you think could be part of a person's sexuality?

If participants do not identify in the following, add

- Sexual and reproductive anatomy
- Body image
- Biological sex
- Gender including gender identity, gender expression and gender roles
- Sexual orientation
- Desires, pleasure, intimacy and reproduction
- Beliefs, attitudes and values about sexuality"

- LAM-SI-F1, "This Is Me. Who Are You? page 94: "Our identity, or how we see ourselves, includes many different things, such as our race/ethnicity, nationality, culture, religious affiliation, age, gender, sexuality, roles (Ex: athlete, big sister, etc.), personality traits and interests."

- LAM-HW-F1, Facilitator Resource, “Frequently Asked Questions,” page 148: **“Why would someone with a penis not identify as a boy/man? Why would someone with a vulva not identify as a girl/woman?”**
When we use body parts to describe people, we’re talking about ‘biological sex,’ or sex assigned at birth, which is different than gender. Gender is how people identify and express themselves. Transgender people are people whose gender identity is different from their biological sex or sex assigned at birth. Gender non-conforming and non-binary people are people whose gender identities are not exclusively either boy/man or girl/woman. However someone identifies, they should feel safe, respected and included in TOP.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. New Jersey’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

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Therefore, ACF instructs New Jersey to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ New Jersey is directed to remove these and all similar language throughout their curricula and program materials. Should New Jersey fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

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Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families

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ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Kate Daniel
New Mexico Department of Health
1190 South Street Francis Drive, Suite N4100
Sante Fe, NM 87502

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#1601NMPREP), 2024 (#1601NMPREP), and 2025 (#1601NMPREP).

Dear Ms. Daniel:

On April 14, 2025, the Administration for Children and Families (ACF) requested that New Mexico provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing New Mexico's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from New Mexico's PREP curricula and program materials:¹

Teen Connection Project, 1st Edition

- Training and Facilitation Guide, Page 26: "Lesbian, gay, bisexual, transgender and queer/questioning (LGBTQ) youth face a variety of unique obstacles

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facilitators must be aware of. Youth that identify or are perceived as LGBTQ are more likely to be victims of harassment, bullying and violence, especially at school, causing them to feel uncomfortable and unsafe in environments where they may be targeted.”

- Page 26, facilitation tips:
 - “Foster an environment that is accepting of sexual and gender diversity, starting with you. Explore your own values and biases related to sexual orientation and gender identity and take time to learn about how society represents and receives LGBTQ people. Consider how bias and judgements may spill over into your group atmosphere or facilitation and take purposeful steps to mitigate them.
 - Don’t assume you will be able to tell what a teen’s sexual orientation or gender identity is, even if you have known them a long time.
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 - Try to use gender-neutral language such as ‘they/them’ instead of ‘him/her’ or ‘he/she’ and ‘partner’ instead of ‘boyfriend/girlfriend’ whenever possible.
 - Avoid characterizing heterosexual sex or sex between two cisgender individuals as “normal” and instead try to use neutral and inclusive language when talking about sex and anatomy.
 - At all times, make it clear that offensive language, stereotypes and stigmatization will not be tolerated. Encourage open discussion about sexual orientation, gender identity and healthy relationships of all kinds as a part of learning about human development.”
- Page 27: “Cultural and Human Diversity Awareness and Inquiry
 - Cultural and Human Diversity Awareness and Inquiry
 - Relationship and Communication Sensitive to Cultural and Human Diversity
 - Practice Methods Sensitive to Cultural and Human Diversity”

Teen Outreach Program (TOP), 2nd Edition

- LAM-SU-A2, “Defining Sexuality,” page 80: “Facilitator Tip:

Sexuality is complex and can be difficult to define. It is normal for participants to struggle to understand it broadly and to have differing views. Support participants in sharing and listening to one another, and make sure dialogue remains respectful and inclusive.

Circle ‘Sex’ in ‘Sexuality.’

Ask

- How much of our Word Web is about ‘having sex’ or ‘sex’ as physical behavior?

Share

- Sexuality is more than physical behavior.

Ask

- Besides physical behavior, what else do you think could be part of a person’s sexuality?

If participants do not identify in the following, add

- Sexual and reproductive anatomy
 - Body image
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 - Gender including gender identity, gender expression and gender roles
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“Frequently asked Questions: Why would someone with a penis not identify as a boy/man? Why would someone with a vulva not identify as a girl/woman?”
 - When we use body parts to describe people, we’re talking about ‘biological sex,’ or sex assigned at birth, which is different than gender. Gender is how people identify and express themselves. Transgender people are people whose gender identity is different from their biological sex or sex assigned at birth. Gender non-conforming and non-binary people are people whose gender identities are not exclusively either boy/man or girl/woman. However someone identifies, they should feel safe, respected and included in TOP.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

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Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

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Tuesday, August 26, 2025

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 - When we use body parts to describe people, we’re talking about ‘biological sex,’ or sex assigned at birth, which is different than gender. Gender is how people identify and express themselves. Transgender people are people whose gender identity is different from their biological sex or sex assigned at birth. Gender non-conforming and non-binary people are people whose gender identities are not exclusively either boy/man or girl/woman. However someone identifies, they should feel safe, respected and included in TOP.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress. New Mexico's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs New Mexico to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ New Mexico is directed to remove these and all similar language throughout their curricula and program materials. Should New Mexico fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: "(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management."

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Se'an Bournes, sean.bournes@acf.hhs.gov.

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Mr. Jonathan Fanning
New York State Department of Health
Empire State Plaza
Corning Tower Room 859
Albany, NY 12237

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301NYPREP), 2024 (#2401NYPREP), and 2025 (#2502NYPREP).

Dear: Mr. Fanning:

On April 14, 2025, the Administration for Children and Families (ACF) requested that New York provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing New York's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from New York's PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if New York's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, New York will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Be Proud Be Responsible! 5th Edition, Facilitator Manual

- Page 15 (Facilitator Information): “Demonstrate acceptance and respect for all participants, regardless of personal characteristics, including race, cultural background, religion, social class, sexual orientation or gender identity.”
- Page 20 (Teaching Strategies on Roleplaying): “In addition, during the roleplay practice, participants may roleplay sexual pressure situations with someone of a different or the same gender. This may be awkward for straight teens who are sensitive to the suggestion of same-sex romance, for teens who identify as gay or lesbian, or for teens who are transgender or gender nonconforming. It’s important to address this situation directly and proactively.”

Making Proud Choices, 5th Edition, Facilitator Manual

- Page 36 (Module 1, Activity B Procedure): “Facilitator’s Note: Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus “outing” themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”
- Page 39-40 (Module 1, Activity C Procedure): “**Respect diversity:** Let’s keep in mind that there’s diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren’t even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other’s may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

Young people may express themselves in ways that don’t conform with their biological sex. There are many ways that youth can express their gender identity. .
..

Define terms related to diversity as needed.

I want to be sure everyone understands some of the terms we use when talking about diversity.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples' inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn't fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics."

The "purpose" of a PREP grant award is for states to "carry out personal responsibility education programs consistent with this subsection." 42 U.S.C. § 713(b)(1). The statute defines PREP as "a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C)." 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress. New York's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: "(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management."

conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs New York to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ New York is directed to remove these and all similar language throughout their curricula and program materials. Should New York fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Nakia Martin-Wright at nakia.martin-wright@acf.hhs.gov.



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Mandy Cohen
North Carolina Dept. of Health and Human Services
2001 Mail Service Center
Raleigh, NC 27699

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301NCPREP), 2024 (#2401NCPREP), and 2025 (#2501NCPREP).

Dear Ms. Cohen:

On April 14, 2025, the Administration for Children and Families (ACF) requested that North Carolina provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing North Carolina PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from North Carolina's PREP curricula and program materials:¹

Middle School FLASH, Grade 6-8, 2nd Edition (2020)

- Page 40, Lesson 1, Developing a Local Sexual Health Resources List, Teacher Guide: "FLASH recommends referring young people to clinics and agencies that

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are teen and LGBT friendly, culturally competent, supportive of all pregnancy options, and that consider the teen to be their primary client. When creating your local resource sheet, keep these criteria in mind.”

- Pages 59-60 (Lesson 2, Sexual Orientation and Gender Identity, page 2), “FLASH Key Concepts: Everyone has a sexual orientation and a gender identity.

A person knows their sexual orientation because of who they feel attracted to, not because of who they have sex with.

A person knows their gender identity because they feel like a boy, a girl, both, neither or somewhere in between, not because of their body parts.

People of all sexual orientations and gender identities need to know how to prevent pregnancy and STDs, either for themselves or to help a friend.”

- Page 67 (Lesson 2, page 9): “What if I don’t know someone’s sexual orientation or sexual identity? What should I call them?

Every person has the right to name their own identities. It is polite to ask someone how they identify their sexual orientation and gender identity, and what words they would like you to use when talking to them. It is important to respectfully use the terms and pronouns people have asked others to use.”

- Page 72 (Lesson 2): “Sexual Orientation and Gender Identity Definitions

Gender Identity: How a person identifies their gender

Female	a person who identifies as a woman
Male	a person who identifies as a man
Transgender	When a person’s gender identity doesn’t match the sex (male or female) the doctor said they were when they were born
Cisgender	When a person’s gender identity matches the sex (male or female) the doctor said they were when they were born
Gender Queer	Usually means a person doesn’t feel exactly like a boy or a girl, at least not all of the time”

High School FLASH, 3rd Edition, Teacher Manual

- Page 105 (Sexual Orientation and Gender Identity Lesson 4, Page 6) “**Gender Identity**

- Gender Identity is a deep feeling people have about whether they are a guy, a girl, both, neither or somewhere in between.
- People often know their gender identity when they are very little, before they start kindergarten, although everyone is different and some people will know when they are younger or older.
- When a person's gender identity is the same as their assigned sex, it is usually called cisgender.
- When a person's gender identity is not the same as their assigned sex, it is often called transgender. People may also identify as gender queer, gender fluid or some other gender identity."

Rights Respect Responsibilities (the 3Rs), Grade 6

- Pages 1, 37, 44, 55: "A NOTE ABOUT LANGUAGE: Language is really important and we've intentionally been very careful about our language throughout this curriculum. You may notice language throughout the curriculum that seems less familiar- using the pronoun 'they' instead of 'her' or 'him', using gender neutral names in scenarios and role-plays and referring to 'someone with a vulva' vs. a girl or woman. This is intended to make the curriculum inclusive of all genders and gender identities. You will need to determine for yourself how much and how often you can do this in your own school and classroom, and should make adjustments accordingly."

Rights Respect Responsibility (the 3Rs), High School

- Page 4: "Note to the Teacher: If two cisgender, heterosexual boys end up randomly being assigned to each other, it is possible they will have a homophobic response that could include refusing to do the work or speaking or making gestures that mimic their understanding of gay male stereotypes. Some boys may be fine doing the role plays, but someone from another group might make a homophobic comment about it. Should this happen in your class, it's important to stop what you are doing, notice the interaction, and ask for the class members to reflect on what's happening and why. Direct the students back to your class ground rules and reinforce the agreement to be respectful – and that making homophobic comments is not respectful."

Teen Outreach Program (TOP), Second Edition, Facilitator Manual

- LAM-HW-F6, "Abstinence and Expressing Affection," page 196: "Write 'Sexuality' on the board/chart paper.

Share

- Becoming more aware and interested in sexuality is a normal and natural part of adolescence.

Ask (write responses on board/chart paper)

- When you see and hear the word ‘sexuality,’ what comes to mind?
- What do you think influences our views of sexuality?

Circle the word ‘sex’ within ‘sexuality’ on the board/chart paper.

Share

- When people think of sexuality, they often just think of sex
 - However, sex is only one part of sexuality.
 - Sexuality also includes our bodies and how we feel about them, our desires and attractions to others, our relationships, our beliefs and values about sexuality, how we should love and affection and how we identify and express our gender
 - While some people choose to express their sexuality through sex, others choose to practice abstinence.”
- LAM-HW-F1, Facilitator Resource, page 147-48: **“Why would someone with a penis not identify as a boy/man? Why would someone with a vulva not identify as a girl/woman?”**

When we use body parts to describe people, we’re talking about ‘biological sex,’ or sex assigned at birth, which is different than gender. Gender is how people identify and express themselves. Transgender people are people whose gender identity is different from their biological sex or sex assigned at birth. Gender non-conforming and non-binary people are people whose gender identities are not exclusively either boy/man or girl/woman. However someone identifies, they should feel safe, respected and included in TOP.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress. North Carolina's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs North Carolina to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ North Carolina is directed to remove these and all similar language throughout their curricula and program materials. Should North Carolina fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Sierra Baker at sierra.baker@acf.hhs.gov.



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Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Glenn Muna
CNMI Public School System
P.O. Box 501370
Saipan, MP, 96950-1370

RE: Personal Responsibility Education Program grants for Fiscal Years 2023 (2301MPPREP), 2024 (2401MPPREP), and 2025 (2501MPPREP).

Dear CNMI Public School System:

On April 14, 2025, the Administration for Children and Families (ACF) requested that the Northern Mariana Islands provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing the territory's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from your PREP curricula and program materials:¹

Making Proud Choices! 5th Edition, Curriculum

- Page 36 (Module 1, Activity B Procedure, Facilitator's Note): "Asking participants to tell you their pronouns is a way of creating a safe space for

¹ ACF initiated a medical accuracy review to determine if the Northern Mariana Islands' approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, your territory will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus “outing” themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”

- Pages 39-40 (Module 1, Activity C Procedure): “**Respect diversity:** Let’s keep in mind that there’s diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren’t even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other’s may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

Young people may express themselves in ways that don’t conform with their biological sex. There are many ways that youth can express their gender identity. .
..

Define terms related to diversity as needed.

‘I want to be sure everyone understands some of the terms we use when talking about diversity.’

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples’ inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn’t fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics.”

The “purpose” of a PREP grant award is for states and territories to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the

requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. The commonwealth’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs the Northern Mariana Islands to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged in this letter provides examples of gender ideology content that does not adhere to the PREP statute; we are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Tecia Sellers at tecia.sellers@acf.hhs.gov.

The Northern Mariana Islands is directed to remove these and all similar language throughout the territory’s curricula and program materials. Should the commonwealth fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Chris Freeman
Ohio Department of Youth Services
4545 Fisher Rd.
Columbus, OH 43228

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301OHPREP), 2024 (#2401OHPREP), and (#2501OHPREP).

Dear Chris Freeman:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Ohio provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Ohio's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Ohio's PREP curricula and program materials:¹

Making Proud Choices! 5th edition, Facilitator Curriculum

- Page 36 (Module 1, Activity B, Facilitator's Note): "Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender

¹ ACF initiated a medical accuracy review to determine if Ohio's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Ohio will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus ‘outing’ themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”

- Page 39-40 (Module 1, Activity C, Procedure): “**Respect diversity:** Let’s keep in mind that there’s diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren’t even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other’s may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

Young people may express themselves in ways that don’t conform with their biological sex. There are many ways that youth can express their gender identity.

Define terms related to diversity as needed.

I want to be sure everyone understands some of the terms we use when talking about diversity.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples’ inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn’t fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress. Ohio's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Ohio to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Ohio is directed to remove these and all similar language throughout their curricula and program materials. Should Ohio fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: "(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management."

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Sierra Baker at sierra.baker@acf.hhs.gov.

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Alicia Lincoln
Oklahoma State Dept. of Health
123 Robert S Kerr Ave.
Oklahoma City, OK 73117

RE: State Personal Responsibility Education Program for Fiscal Years 2023
(#2301OKPREP), 2024 (#2401OKPREP), and 2025 (#2501OKPREP).

Dear Ms. Lincoln:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Oklahoma provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Oklahoma's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Oklahoma's PREP curricula and program materials:¹

It's that Easy: A Guide to Raising Sexually Healthy Children (Resource Manual)

- Page 10 (Glossary):

¹ ACF initiated a medical accuracy review to determine if Oklahoma's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Oklahoma will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

“Gender: The set of meanings assigned by a culture or society to someone’s perceived biological sex. Gender has three components: gender identity, physical markers and gender expression.

Gender Identity: An individual’s internal sense of their gender. Gender identities may include male, female, transgender, non-binary, agender, bigender, genderfluid and genderqueer. For example, a person whose gender identity does not align with the biological sex they were assigned at birth is ‘transgender’ and a person whose gender identity aligns with the biological sex they were assigned at birth is ‘cisgender.’

Gender Expression: A person’s outward gender presentation, usually comprised of personal style, clothing, hairstyle, makeup, jewelry, vocal inflection and body language. Gender expression is typically categorized as masculine, feminine, or androgynous, and there are many shades in between all of these. Gender expression may change throughout a person’s life or in different situations and may or may not conform to a person’s gender identity.”

- Page 115 (Healthy Sexual Development: Ages 15-18): “Make sure that your children get information that makes sense for them. Remember that sexual identity and sexual behavior don’t always match up. Gay, lesbian, transgender or bisexual youth may need different resources and support. Parents can help them find it.”

Making a Difference, 5th Edition, Facilitator Curriculum

- Page 36 (Module 1, Activity B, Procedure, Facilitator’s Note): “Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus ‘outing’ themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”
- Page 38-39 (Module 1, Activity C, Procedure): “Be sure to cover confidentiality, right to pass and respecting diversity. . . . **Respect diversity:** Let’s keep in mind that there’s diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren’t even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other’s may have had sex against their will. Some

may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

Young people may express themselves in ways that don't conform with their biological sex. There are many ways that youth can express their gender identity."

The "purpose" of a PREP grant award is for states to "carry out personal responsibility education programs consistent with this subsection." 42 U.S.C. § 713(b)(1). The statute defines PREP as "a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C)." 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress. Oklahoma's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Oklahoma to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: "(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management."

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Oklahoma is directed to remove these and all similar language throughout their curricula and program materials. Should Oklahoma fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Megan Hill at megan.hill@acf.hhs.gov.



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 27, 2025

Nadia Davidson, Chief Financial Officer
Oregon Health Authority
800 NE Oregon Street Ste 805
Portland, OR 97232

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301ORPREP), 2024 (#2401ORPREP), and 2025 (#2501ORPREP).

Dear Oregon Health Authority:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Oregon provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Oregon's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Oregon's PREP curricula and program materials:¹

Friendships and Dating Program (2008-2017), Curriculum Manual, Sessions 1-20

- Section 5: Types of Relationships, page 37:

¹ ACF initiated a medical accuracy review to determine if Oregon's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Oregon will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

“Facilitator Tip: You may want to explore LGBT support organizations in your community. While it is a brief conversation, if participants have additional questions or need more in-depth coverage, you will be able to comfortably and knowledgeably point them to additional resources.

Ask participants if they know what sexual orientation and gender identity mean.

- Allow for peer interaction and opportunity for participants to lead this discussion.

Help the group understand sexual orientation is the term used to describe what gender(s) someone is sexually or romantically attracted to. Gender identity is the term used to describe how someone views their gender.

Use the Genderbread Person handout found on the FDP Website to discuss differences in gender identity, gender expression, biological sex, and sexual orientation (optional).

Ask participants if they know what the term straight or heterosexual means.

- People who are attracted to members of the other sex often call themselves straight or heterosexual.

Ask participants if they are familiar with the term LGBTQ. Allow participants to give answers, praise responses. Explain what each letter stands for. You may want to write LGBTQ on the board and write what each letter stands for.

- L = Lesbian – Women who are attracted to other women. Some people may prefer the term gay or gay women.
- G = Gay – People who are attracted to other people of the same sex. It is often used to describe males attracted to males, but is also used by lesbians.
- B = Bisexual – People who are attracted to both men and women often call themselves bisexual.
- T = Transgender – People who feel that their gender expression and gender identity are different from what people told them they were based on biological sex (body parts). For example, a person might be transgendered if when they were born their doctor and parents said they were a boy, but as the person grew up if felt like they were a girl.
- Q = Questioning – People who are unsure about their sexual orientation may call themselves questioning or curious.

- Asexual – People who don't experience any sexual attraction for anyone may call themselves asexual.

Follow up by asking how you can tell someone's sexual orientation. Explain you can't tell a person's sexual orientation by the way they look, their job, interests or hobbies. The only way to know is if they tell you."

Sexuality for All Abilities, 2nd edition, Instructor Manual

- Page 91 (Gender Chapter): "Key Messages:
 - Gender is how you feel. Some people identify as she, he or they. Some people have other ways of identifying.
 - Sometimes a person's gender identity doesn't match the gender that caregivers assign them.
 - Sometimes a person's gender expression also doesn't match their assigned gender.
 - In our society, we have stereotypes of what it means to be a man or a woman. Many people do not fit into this stereotype because we are all different, and that is okay.
- Page 93 (Gender Chapter): "Learning Activities

What is gender?

a. Ask participants: What do you think of when you hear the word gender?

Possible responses: male/female, boy/girl, non-binary, who I am as a person, etc.

b. Read the Gender social story found on the flash drive. Discuss the following key points.

- Gender is how society thinks we should look, think, and act as girls and women and boys and men.
- It can also refer to how a person feels on the inside in regards to being male, female or a different
- gender.
- Gender identity is how you feel inside and how you show your gender through clothing, behavior, and personal appearance. Each person gets to name for themselves what their gender identity is.
- Sometimes this matches the assigned sex, and sometimes it does not.
- When a new baby is born, one of the first questions almost everyone asks is, "Is it a boy or a girl?" This is the sex assigned to you at birth: male or female.
- Assigned Sex: how a person is identified at birth by one's primary sex organ (penis/ vagina).
- Gender Expression: how people express and present themselves to the world. We can get clues to someone's gender identity by their gender expression, but we shouldn't assume we can tell someone's gender identity by their gender expression. It's important to ask someone what

their gender identity is if you need to know. Sometimes this matches the assigned sex, and sometimes it does not.

- Transgender: A term that describes a person whose gender identity does not match that person's sex assigned at birth. This may include someone who was assigned female at birth who feels male, vice versa, or something else altogether. Transgender people may use hormones, have surgery, both, or neither.
- Nonbinary: a gender identity that is outside the binary of girl/woman or boy/man.
- Gender Nonconforming: people who do not follow other people's ideas or stereotypes about how they should look or act. These stereotypes are based on the female or male sex they were assigned at birth.
- Gender Pronouns: used to refer to a person in place of using their name. Some pronouns people use include: he, she, they, zie, per, and others.
- Everyone gets to name their own gender identity and pronouns, including changing the name they use to describe their gender identity. It is important to note that a person's gender identity and pronouns may change over time, and that's ok.
- Sexual Orientation: who a person is romantically attracted to. Gender and Sexual Orientation are different.

- Page 127 (under Glossary of Terms):

“GENDER– A word that refers to how a person feels on the inside in regards to being male, female or a different gender.

GENDER EXPRESSION– How a person represents or expresses their identity to the world. Sometimes this matches their assigned sex, sometimes not.

GENDER FLUIDITY– The flexibility of gender expressions and identities that may change over time or even from day to day. A gender fluid person may feel male on some days, female on others, both male and female, or neither. A gender fluid person might also identify as genderqueer.

GENDER IDENTITY– How a person identifies gender inside of themselves. Sometimes this matches their assigned sex, sometimes not.

GENDER NONCONFORMING– When a person's gender expression doesn't fit inside traditional male or female categories (sometimes called the gender binary).

GENDERQUEER– A term for people who don't identify as a man or a woman or whose identity lies outside the traditional gender binary of male and female. Some people use genderqueer, gender non-conforming, and non-binary interchangeably, but others don't. Genderqueer has a political history, so many use the term to identify their gender as non-normative in some way. For example, someone could identify as both cisgender female and gender queer.

- Page 130 (under Glossary of Terms):
“TWO-SPIRIT– An umbrella term for gender used by Native American and First Nation tribes; refers to people who have both masculine and feminine identity and are treated as a third gender in some tribes. Two-spirit individuals also tend to have same-sex and/or same-gender relationships. Many Native American and First Nation LGBTQ+ individuals identify with the term two-spirit.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. Oregon’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Oregon to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Oregon is directed to remove these and all similar language throughout their curricula and program materials. Should Oregon fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Chéri Thompson at Cheri.Thompson@acf.hhs.gov.



ADMINISTRATION FOR
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Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Ida Kilcullen
Republic of Palau
P.O. Box 189
Koror, Palau 96940

RE: Personal Responsibility Education Program for Fiscal Years 2023 (#2301 PWPREP), 2024 (#2401 PWPREP), and 2025 (#2501 PWPREP).

Dear Ms. Kilcullen,

On April 14, 2025, the Administration for Children and Families (ACF) requested that the Republic of Palau provide current curricula and programmatic materials in use or in any way relevant to your Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Palau's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Palau's PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if Palau's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Palau will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Draw the Line/Respect the Line

- Page 6 (“How to Use the Curriculum”): “While some young people may feel more comfortable or be able to be more honest when discussing sexuality-related issues in single-gender groups, we do not recommend dividing the class in this way, as it can cause trauma for transgender, gender non-conforming, and non-binary youth. . . .

The use of integrated, mixed-gender groups is considered best practice for current-day classrooms and youth groups, and is something sexuality educators are trained to facilitate. Use of mixed-gender groups can help promote gender equity, build understanding of different perspectives, and increase inclusivity for transgender, gender nonconforming, and non-binary youth.”

- Lesson 1, Activity 4.5 (page 59) and Lesson 4, Activity 4.4 (page 92):

Teacher’s Note

During the roleplay practice, youth may roleplay pressure situations with a partner of a different or the same gender. This may be awkward for teens who are sensitive to the suggestion of same-sex romance, for teens who identify as gay or lesbian, or for teens who are transgender or gender nonconforming. It’s important to address this situation directly and proactively.

Here are some tips:

- Explain the situation in a matter-of-fact way. Let youth know that they may be doing the roleplays with a partner of a different or the same gender.
- Emphasize that they are playing roles. Doing the roleplay to practice the skill doesn’t say anything about the sexual attraction of the people doing the roleplay or mean that anyone is expressing a real-life attraction toward the other person in the roleplay.
- Explain that they need to take their role seriously because teens of all sexual orientations and gender identities need to learn how to draw the line to resist sexual pressure and protect themselves. This will help ensure that they and their classmates get the most out of the roleplay activities.

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects

described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress.

The Republic of Palau's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs the Republic of Palau to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged in this letter provides examples of gender ideology content that does not adhere to the PREP statute; we are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Tecia Sellers at tecia.sellers@acf.hhs.gov.

The Republic of Palau is directed to remove these and all similar language throughout their curricula and program materials. Should Palau fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: "(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management."

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Kathy Jo Stence, Director
Pennsylvania Department of Health
7th Floor East, Health & Human Services Building
625 Forster Street
Harrisburg, PA 17120

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301PAPREP), 2024 (#2401PAPREP), and 2025 (#2501PAPREP).

Dear Pennsylvania Department of Health:

On April 14, 2025, the Administration for Children and Families (ACF) requested that the Commonwealth of Pennsylvania provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing the Commonwealth's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Pennsylvania's PREP curricula and program materials:¹

Making Proud Choices! 5th Edition, Facilitator Curriculum California

- Page 31, Pre-Module, Setting the Stage: Sexual Diversity and Healthy Relationship (Learning Objectives):

¹ ACF initiated a medical accuracy review to determine if Pennsylvania's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Pennsylvania will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

- “Explain how gender identity, gender expression, sex assigned at birth, sexual and emotional attraction, and sexual behavior are related to sexual identity.
 - Describe their own identity using affirming terms.
 - Explain how understanding sexual identity and diversity can positively impact all individuals and decrease the harms caused by stigma and shame.”
- Page 32: “This pre-module sets a tone that welcomes diversity of sexual identity and creates a respectful space for all participants. They learn the distinctions between gender identity, gender expression, sex assigned at birth, sexual attraction/orientation and sexual behavior with the help of a visual aid. They apply this learning to understanding their own sexual identity, and discuss how stereotypes, stigma and shame can impact LGBTQ+ individuals.”
 - Page 55 (Module 1, Activity B Procedure, Facilitator’s Note): “Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus “outing” themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”
 - Pages 58-59 (Module 1, Activity C Procedure): **“Respect diversity:** Let’s keep in mind that there’s diversity in society and in this group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren’t even thinking about it. Some have had sexual intercourse. Some have had sex because they chose to; others may have had sex against their will. Some may identify as male, female or transgender.

Your people may express themselves in ways that don’t conform with their biological sex. There are many ways that youth can express their gender identity. .
..

Define terms related to diversity as needed.

I want to be sure everyone understands some of the terms we use when talking about diversity.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples' inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn't fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics."

Be Proud! Be Responsible! Facilitator Manual

- Page 17: "Demonstrate acceptance and respect for all participants, regardless of personal characteristics, including race, cultural background, religion, social class, sexual orientation or gender identity."
- Page 21: "In addition, during the roleplay practice, participants may roleplay sexual pressure situations with someone of a different or the same gender. This may be awkward for straight teens who are sensitive to the suggestion of same-sex romance, for teens who identify as gay or lesbian, or for teens who are transgender or gender nonconforming. It's important to address this situation directly and proactively."

Here are some tips:

Explain the situation in a matter-of-fact way. Let participants know that they may be doing the roleplays with someone of a different or the same gender.

Emphasize that they are playing roles. Doing the roleplay to practice the skill doesn't say anything about the sexual orientation of the people doing the roleplay or mean that anyone is expressing a real-life attraction toward the other person in the roleplay.

Explain that they need to take their roles seriously because teens of all sexual orientations and gender identities need to learn how to resist sexual pressure and negotiate condom use to protect themselves. This will help ensure that they all get the most out of the roleplay activities."

Friendships and Dating Program, First Edition (2008-2017), Curriculum Manual

- Section 5: Types of Relationships, page 37: "Facilitator Tip: You may want to explore LGBT support organizations in your community. While it is a brief conversation, if participants have additional questions or need more in-depth coverage, you will be able to comfortably and knowledgeably point them to additional resources."

Ask participants if they know what sexual orientation and gender identity mean.

- Allow for peer interaction and opportunity for participants to lead this discussion.

Help the group understand sexual orientation is the term used to describe what gender(s) someone is sexually or romantically attracted to. Gender identity is the term used to describe how someone views their gender.

Use the Genderbread Person handout found on the FDP Website to discuss differences in gender identity, gender expression, biological sex, and sexual orientation (optional).

Ask participants if they know what the term straight or heterosexual means.

- People who are attracted to members of the other sex often call themselves straight or heterosexual

Ask participants if they are familiar with the term LGBTQ. Allow participants to give answers, praise responses. Explain what each letter stands for. You may want to write LGBTQ on the board and write what each letter stands for.

- L = Lesbian – Women who are attracted to other women. Some people may prefer the term gay or gay women.
- G = Gay – People who are attracted to other people of the same sex. It is often used to describe males attracted to males, but is also used by lesbians.
- B = Bisexual – People who are attracted to both men and women often call themselves bisexual.
- T = Transgender – People who feel that their gender expression and gender identity are different from what people told them they were based on biological sex (body parts). For example, a person might be transgendered if when they were born their doctor and parents said they were a boy, but as the person grew up if felt like they were a girl.
- Q = Questioning – People who are unsure about their sexual orientation may call themselves questioning or curious.
- Asexual – People who don't experience any sexual attraction for anyone may call themselves asexual.

Follow up by asking how you can tell someone's sexual orientation. Explain you can't tell a person's sexual orientation by the way they look, their job, interests or hobbies. The only way to know is if they tell you."

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. Pennsylvania’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Pennsylvania to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Pennsylvania is directed to remove

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Chéri Thompson at Cheri.Thompson@acf.hhs.gov.

these and all similar language throughout their curricula and program materials. Should Pennsylvania fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive, slightly slanted style.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Dr. Manuel Vargas Bernal
Puerto Rico Department of Health
P.O. Box 70184
San Juan, PR 00936-8184

RE: Personal Responsibility Education Program grants for Fiscal Years 2023 (2301PRPREP), 2024 (2401PRPREP), and 2025 (2501PRPREP).

Dear Dr. Vargas Bernal:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Puerto Rico provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Puerto Rico's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Puerto Rico's PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if Puerto Rico's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Puerto Rico will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

El Camino Curriculum, 2nd ed.

- Lesson 5, page 7: “After a few responses, show the following review video which explains the difference between gender identity and sex (3-4 min.)

Tell students:

Like the video shared, sex assigned at birth is based on how someone else sees our bodies and doesn’t take into account how someone might see themselves as a whole person, or their gender identity. Culture can influence the ways people express their gender identity and shape people’s gender expression in the ways someone dresses, talks, acts, and more. We learn many cultural values from those around us, such as parents, grandparents, and friends. This may include values about gender and sexuality.”

- Lesson 5, page 10: Facilitator Note: “Remind students that gender is different from sex. Tell the students that in this lesson we will use the phrases ‘person with a penis’ and ‘person with a vagina’ when discussing reproductive systems.”
- Lesson 5, page 29: “Transmasculine people can get pregnant if they have a uterus. Although testosterone hormone therapy decreases fertility, transmasculine people can still get pregnant during and after hormone therapy. It may also take longer for transmasculine people to know they’re pregnant because testosterone hormone therapy causes irregularities to the menstrual cycle or stops it altogether.”
- Appendix H: Supplemental Resources for Working with LGBTQ+ Youth; “Sex, Gender, and Identity,” page 1: “People may feel discomfort around commonly gendered body parts like their chest or genitalia. Practices like tucking and binding are non-permanent options to change the way those body parts look in clothes and ease their ease distress. Tucking involves flattening the space between someone’s legs by moving the penis and testicles. Binding is something people do to compress their chest to create the appearance of a flat chest. Some people see tucking and binding as daily components of their gender expression, and other people only use them sometimes.”
- Appendix H: Supplemental Resources for Working with LGBTQ+ Youth; “LGBT Definitions,” pages 2-4:

“**Pansexual (Pan)** -- people who are attracted to people of all genders. Like bisexual people, pansexual people can be attracted to people of each gender in different ways and be attracted to people of some genders more than others. Gender is not as relevant for pansexual people as it is for bisexual people.

Queer -- both a general descriptor of people who are not heterosexual as well as a specific identity. It can also be associated with a rejection of labels and gendered concepts like the gender binary. It has been used as a slur against LGBTQ+ people, so even though it has been reclaimed by the community, it is important to be mindful that some LGBTQ+ people, especially those who are older, may not

be comfortable with being called queer. It is important to use the terms people prefer to describe their identities and experiences.

Gender -- is a socially constructed identification that refers to a constellation of behaviors, norms, and characteristics that vary by culture and over time.

AFAB -- acronym for assigned female at birth. People use “assigned” to reflect that gender and sex assignments at birth are generally based on physical characteristics and may not be accurate to a person’s experience or even biological context such as hormonal and genetic contributions.

Agender -- used to describe people who don’t experience a gender. Agender people see gender as something that is abstract and doesn’t relate to or resonate with them.

AMAB -- acronym for assigned male at birth. People use “assigned” to reflect that gender and sex assignments at birth are generally based on physical characteristics and may not be accurate to a person’s experience or even biological context such as hormonal and genetic contributions.

Cisgender (Cis) -- people who identify with the gender they were assigned at birth.

Cishet -- people who are both cisgender and heterosexual; this term is short for cisgender, heterosexual.

Cisnormative -- refers to the idea that being cisgender is the norm and anyone who is not cisgender is abnormal. This idea has deep cultural roots and pressures people to identify as cisgender.

Gender binary -- refers to a system that classifies people as either men or women based on assigned sex and gender at birth. The gender binary relies on there being only two genders and those two genders being different from one another.

Gender dysphoria -- refers to the distress people experience when their gender identity and assigned gender are different.

Gender expression -- refers to how people show their gender, often through appearance and behavior.

Gender identity -- refers to someone’s internal sense or understanding of their gender.

Gender non-conforming (GNC) -- used to describe people whose gender expression doesn’t conform to the societal expectations of their assigned gender.

Genderfluid -- used to describe people who fluctuate between different gender identities. For example, some days a genderfluid person may feel more like a boy, somedays they may feel more like a girl, and other days they may feel like another gender outside of the binary.

Genderqueer -- used to describe people whose gender identity is queer or outside of the norms set by cisnormativity. This term originated in political circles within the queer liberation movement, and many people who use the term also identify their sexual orientation as queer, or not straight. Although genderqueer and non-binary are both terms used to indicate that a person does not have a binary identification, the use of the term “queer” in genderqueer indicates a perspective aimed at dismantling current ways of thinking about gender.

Non-binary -- can be used as an umbrella term to include people whose gender identity is outside of the gender binary and as a specific identifier. Non-binary

people can have different conceptions of their gender with some relating to binary experiences and others not relating to those experiences.

Physical transition -- refers to the process of making physical changes to one's body through hormone therapy and/or surgeries to better align their physical body to their gender identity.

Social transition -- refers to the process of changing non-physical aspects of one's gender identity, such as their name and pronouns, and incorporating new aspects of gender expression into day-to-day life.

Transgender (Trans) -- an umbrella term used to describe people who do not identify with the gender they were assigned at birth. Trans women are women who were assigned male at birth (AMAB) and trans men are men who were assigned female at birth (AFAB). Sometimes the term trans is used to specifically talk about trans men and women, and sometimes it is used to talk about all people who do not identify with the gender they were assigned at birth. Non-binary and genderqueer people are included in this definition, but not all non-binary and genderqueer people choose to also identify as trans. There are no requirements to "being" trans other than not identifying with your gender assigned at birth.

Transfeminine -- used to describe AMAB people who identify with femininity in terms of gender identity or gender expression. This can include trans women and non-binary people.

Transmasculine --used to describe AFAB people who identify with masculinity in terms of gender identity or gender expression. This can include trans men and non-binary people.

Two-Spirit --used as an umbrella term to describe Indigenous people who conceptualize themselves outside of the dominant cisgender and heterosexual ways of identifying. This specific term was created as a pan-Native American identifier and has only been in use for a few decades. However, the concept has deep and varied roots in Indigenous communities and should never be used by people outside of those communities. Additionally, just because someone is LGBTQ+ and Native American doesn't mean that they're Two-Spirit, and just because someone is Two-Spirit doesn't mean they identify as LGBTQ+."

The "purpose" of a PREP grant award is for states to "carry out personal responsibility education programs consistent with this subsection." 42 U.S.C. § 713(b)(1). The statute defines PREP as "a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the six adulthood preparation subjects described in subparagraph (C)." 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress. Puerto Rico's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Puerto Rico to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute. We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Megan Hill at MeGan.Hill@acf.hhs.gov.

Puerto Rico is directed to remove these and all similar language throughout their curricula and program materials. Should Puerto Rico fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: "(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management."

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Lori Zelano
Rhode Island Department of Health
3 Capitol Hill, Room 302
Providence, RI 02908

RE: State Personal Responsibility Education Program for Fiscal Years 2023
(#2301RIPREP), 2024 (#2401RIPREP); and 2025 (#2501RIPREP).

Dear Rhode Island Department of Health:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Rhode Island provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Rhode Island's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Rhode Island's PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if Rhode Island's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Rhode Island will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Teen Outreach Program (TOP), 2nd Edition

- LAM-SU-A2, “Defining Sexuality,” page 80: “Facilitator Tip: Sexuality is complex and can be difficult to define. It is normal for participants to struggle to understand it broadly and to have differing views. Support participants in sharing and listening to one another, and make sure dialogue remains respectful and inclusive.

Circle ‘Sex’ in ‘Sexuality.’

Ask

- How much of our Word Web is about ‘having sex’ or ‘sex’ as physical behavior?

Share

- Sexuality is more than physical behavior

Ask

- Besides physical behavior, what else do you think could be part of a person’s sexuality?

If participants do not identify in the following, add

- Sexual and reproductive anatomy
- Body Image
- Biological sex
- Gender Including gender identity, gender expression and gender roles
- Sexual orientation
- Desires, pleasure, intimacy and reproduction
- Beliefs, attitudes and values about sexuality”

- LAM-SI-F1, “This Is Me. Who Are You? page 94: “Ask
 - What comes to mind when you hear me say ‘identity’?
 - What might be part of someone’s identity?

If participants do not identify the following, add

- Our identity, or how we see ourselves, includes many different things, such as our race/ethnicity, nationality, culture, religious affiliation, age, gender, sexuality, roles (Ex: athlete, big sister, etc.), personality traits and interests.

Share

- We all have our own unique identity.
- Today in TOP Club, we will explore our own identity and learn about others’ identities.

- Identity is personal and can be sensitive. Anytime we share personal information with each other, we need to pay extra attention to our group guidelines.
 - We are all part of keeping TOP a safe space.
 - It's important to be patient, kind and supportive.
 - Remember that it is not okay to put other people on the spot or identify other people by name and share their personal experiences."
- LAM-HW-F1, Facilitator Resource, "Frequently Asked Questions," page 148:

"Why would someone with a penis not identify as a boy/man?"

Why would someone with a vulva not identify as a girl/woman? When we use body parts to describe people, we're talking about 'biological sex,' or sex assigned at birth, which is different than gender. Gender is how people identify and express themselves. Transgender people are people whose gender identity is different from their biological sex or sex assigned at birth. Gender non-conforming and non-binary people are people whose gender identities are not exclusively either boy/man or girl/woman. However someone identifies, they should feel safe, respected and included in TOP."

- Pages 142, 156, 179, 187, 195, 202, 232, 254, 264, 271, 275, 280, 286, 319, and 344 (repeated admonition to use "inclusive" language in almost every lesson):

"Use inclusive language. Even if you have known all your participants a long time, do not make assumptions about their sexuality and who they are interested in dating. LGBTQ youth can quickly feel isolated if all relationship examples and language are only heterosexual. Use the term 'partner' to refer to a romantic partner."

- LAM-HW-F6, "Abstinence and Expressing Affection," pages 195-98:

"Circle the word 'sex' with 'sexuality' on the board/chart paper.

Share

- When people think of sexuality, often just think of sex.
- However, sex is only one part of sexuality.
- Sexuality also includes our bodies and how we feel about them, our desires and attractions to others, our relationships, our beliefs and values about sexuality, how we show love and affection and how we identify and express our gender.
- While some people choose to express their sexuality through sex, others choose to practice abstinence."

The "purpose" of a PREP grant award is for states to "carry out personal responsibility education programs consistent with this subsection." 42 U.S.C. § 713(b)(1). The statute defines PREP as "a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted

infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. Rhode Island’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Rhode Island to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Rhode Island is directed to remove these and all similar language throughout their curricula and program materials. Should Rhode Island fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Arlisa Britt, arlisa.britt@acf.hhs.gov.

(allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Danielle Wingo
South Carolina Department of Public Health
400 Otarre Parkway
Cayce, SC 29033

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2401SCPREP), 2024 (#2501SCPREP), and 2025 (#2601SCPREP).

Dear Ms. Wingo:

On April 14, 2025, the Administration for Children and Families (ACF) requested that South Carolina provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing South Carolina's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from South Carolina's PREP curricula and program materials:¹

Making Proud Choices, 5th edition

- Page 36 (Module 1, Activity B Procedure): "Facilitator's Note: Asking participants to tell you their pronouns is a way of creating a safe space for

¹ ACF initiated a medical accuracy review to determine if South Carolina's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, South Carolina will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus “outing” themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”

- Pages 39-40 (Module 1, Activity C Procedure): “Define Terms related to diversity as needed.

I want to be sure everyone understands some of the terms we use when talking about diversity.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples’ inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn’t fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics.”

Making Proud Choices! 5th Edition, Facilitator Curriculum California

- Pre-Module, Setting the Stage: Sexual Diversity and Healthy Relationships,” Page 31: “Learning Objectives:
 - Explain how gender identity, gender expression, sex assigned at birth, sexual and emotional attraction, and sexual behavior are related to sexual identity.
 - Describe their own identity using affirming terms.
 - Explain how understanding sexual identity and diversity can positively impact all individuals and decrease the harms caused by stigma and shame.”
- Page 32: “This pre-module sets a tone that welcomes diversity of sexual identity and creates a respectful space for all participants. They learn the distinctions between gender identity, gender expression, sex assigned at birth, sexual attraction/orientation and sexual behavior with the help of a visual aid. They apply this learning to understanding their own sexual identity, and discuss how stereotypes, stigma and shame can impact LGBTQ+ individuals.”

One Circle Foundation (2015), Teacher Manual

- Page 14: “It is important to understand and clarify that sexual orientation and gender identity and expression are indeed three separate pieces of one’s identity and not to be conflated or viewed as one in the same. For this reason, the acronym SOGIE (Sexual Orientation, Gender Identity and Expression) is used to acknowledge the differences between these three identity pieces and the expansive and continuum nature of these identities.”
- Page 15: “**Gender Identity** refers to the gender an individual truly feels they identify as including who someone is – a male, female, both – genderfluid, genderqueer, gender non-conforming, neither, or other. Biological sex organs may or may not match one’s gender identity. Transgender youth are young people who know themselves as a gender that is different from the assigned gender based on their biological sex organs at birth.
Gender Expression is physical manifestation of one’s gender identity through clothing, hairstyle, voice, body shape, etc.
Sex Assigned at Birth is classifying people as male, female, intersex, or another sex based on a combination of anatomy, hormones, chromosomes. It is also important to know that about one in 1,500-2,000 people in North America are born with ambiguous sex organs known as intersex.”

A helpful infographic tool, The Gender Unicorn, created by youth, can be sourced through Trans Student Educational Resources (TSER) and is effective when learning and educating others regarding being SOGIE affirming.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress. South Carolina's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs South Carolina to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ South Carolina is directed to remove these and all similar language throughout their curricula and program materials. Should South Carolina fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Latanya Bispham-Robinson, latanya.bispham-robinson@acf.hhs.gov.



ADMINISTRATION FOR
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Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Darcy McGuigan
Finance Director
South Dakota Dept. of Health
600 East Capitol Avenue
Pierre, SD 57501-2536

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301SDPREP), 2024 (#2401SDPREP), and 2025 (#2501SDPREP).

Dear Ms. McGuigan:

On April 14, 2025, the Administration for Children and Families (ACF) requested that South Dakota provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing South Dakota's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from South Dakota's PREP curricula and program materials:¹

Teen Outreach Program (TOP), 2nd edition, Curriculum

- LAM-SU-A2, "Defining Sexuality," page 80: "Facilitator Tip:

¹ ACF initiated a medical accuracy review to determine if South Dakota's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, South Dakota will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Sexuality is complex and can be difficult to define. It is normal for participants to struggle to understand it broadly and to have different views. Support participants in sharing and listening to one another, and make sure dialogue remains respectful and inclusive.

Ask

- How much of our Word Web is about ‘having sex’ or ‘sex as a physical behavior?’

Share

- Sexuality is more than physical behavior.

Ask (add responses to Word Web)

- Besides physical behavior, what else do you think could be part of a person’s sexuality?

If participants do not identify in the following, add

- Sexual and reproductive anatomy
- Body image
- Biological sex
- Gender including gender identity, gender expression and gender roles
- Sexual orientation
- Desires, pleasure, intimacy and reproduction
- Beliefs, attitudes and values about sexuality

Share

- Sexuality can include some or all of these things.
- Sexuality is a personal experience and will be different for everyone.”

- LAM SI-F1, “This Is Me. Who Are You?” page 94: “Our identity, or how we see ourselves, includes many different things, such as our race/ethnicity, nationality, culture, religious affiliation, age, gender, sexuality, roles (Ex: athlete, big sister, etc.), personality traits and interests.”
- LAM-HW-F1, Facilitator Resource, page 148: “Frequently asked Questions:

Why would someone with a penis not identify as a boy/man? Why would someone with a vulva not identify as a girl/woman?

When we use body parts to describe people, we’re talking about ‘biological sex,’ or sex assigned at birth, which is different than gender. Gender is how people identify and express themselves. Transgender people are people whose gender identity is different from their biological sex or sex assigned at birth. Gender non-conforming and non-binary people are people whose gender identities are not exclusively either boy/man or girl/woman. However someone identifies, they should feel safe, respected and included in TOP.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. South Dakota’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs South Dakota to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ South Dakota is directed to remove

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

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these and all similar language throughout their curricula and program materials. Should South Dakota fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Mr. Mohamed El-Kaissy
Tennessee Department of Children Services
315 Deaderick Street
9th Floor, OBS Building
Nashville, TN 37243

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301TNPREP), 2024 (#2401TNPREP), and 2025 (#2501TNPREP).

Dear Mr. El-Kaissy:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Tennessee provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Tennessee's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Tennessee's PREP curricula and program materials:¹

Teen Outreach Program (TOP), 2nd Edition, Curriculum

- LAM-SU-A2, "Defining Sexuality," page 80; "Facilitator Tip: Sexuality is complex and can be difficult to define. It is normal for participants to struggle to

¹ ACF initiated a medical accuracy review to determine if Tennessee's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Tennessee will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

understand it broadly and to have different views. Support participants in sharing and listening to one another, and make sure dialogue remains respectful and inclusive.

Circle ‘sex’ in “Sexuality.”

Ask

- How much of our Word Web is about ‘having sex’ or ‘sex’ as a physical behavior?

Share

- Sexuality is more than physical behavior.

Ask

- Beside physical behavior, what else do you think could be part of a person’s sexuality?

If participants do not identify in the following, add

- Sexual and reproductive anatomy
- Body Image
- Biological sex
- Gender Including gender identity, gender expression and gender roles
- Sexual orientation
- Desires, pleasure, intimacy and reproduction
- Beliefs, attitudes and values about sexuality

Share

- Sexuality can include some or all these things.
- Sexuality is a personal experience and will be different for everyone.”

- LAM-HW-F1, “Frequently Asked Questions,” Pages 147-48:

“Why would someone with a penis not identify as a boy/man?”

Why would someone with a vulva not identify as a girl/woman? When we use body parts to describe people, we’re talking about ‘biological sex,’ or sex assigned at birth, which is different than gender. Gender is how people identify and express themselves. Transgender people are people whose gender identity is different from their biological sex or sex assigned at birth. Gender non-conforming and non-binary people are people whose gender identities are not exclusively either boy/man or girl/woman. However someone identifies, they should feel safe, respected and included in TOP.”

Manhood 2.0, First Edition, Curriculum PowerPoint

- Preface: “The premise of Manhood 2.0 is that being aware and conscious of how we in our society are raised within the confines of restrictive ideas about gender is

not only a necessary, but also a liberating experience. The approach is rooted in popular education, in feminist collective action (intersectional feminism in particular), and in the work of Brazilian educator Paulo Freire. Freire espoused the idea of collective consciousness-raising among those oppressed by the many ways in which people are marginalized – through racism, sexism, homophobia, transphobia, classism, ableism, and so forth. We take this work further by not only supporting young men to recognize ways in which power and oppression manifest in their lives, but also providing them with opportunities to practice skills to create healthier relationships, positive social networks, and nonviolent communities.”

- Page 39:

“BIOLOGICAL SEX

- Biological sex refers to the physical characteristics you are born with. It is assigned based upon a person’s anatomy and physical attributes (such as external sex organs, sex chromosomes, and internal reproductive structures). When these classifications don’t line up with what is typically considered a male or female body, the individual is usually referred to as ‘intersex.’

GENDER

- Gender refers to the attitudes, roles, behaviors, activities, and attributes that a community or society determines is characteristic or uses to describes men, women, boys, and girls.
- This is typically associated with or matches one’s biological sex; individuals who feel that their gender and sex ‘match,’ or are associated, are referred to as ‘cisgender.’
- Some individuals’ gender identity does not conform to those behaviors that are typically associated with their sex; these individuals can refer to themselves as transgender or non-binary, for example.
- Definitions of ‘masculine’ and ‘feminine’ are not fixed. They change over time and are different from society to society. We learn to be our ‘gender’ by interacting with the world around us.
- Sometimes these ideas of how to be a man are thought to be based on our biology rather than something that we learn (such as the common myth that violence is a part of men’s biology).

- Page 40:

“CLOSING STATEMENTS

- 13** ‘Gender’ refers to the way society defines the roles, behaviors, activities, and attributes of men, women, and people who are transgender or nonbinary.
- 14** Gender is different from biological sex. It is not biologically derived or something we are born with.

- 15 Gender is different from one's sexual orientation – how someone identifies (as a man, woman, or other gender identity) is not related to who they are attracted to.
- 16 Characteristics that are 'manly' or 'womanly' are not fixed and can change depending on the person and over time. All men are not only 'one way,' and all women are not only 'one way.'"

The "purpose" of a PREP grant award is for states to "carry out personal responsibility education programs consistent with this subsection." 42 U.S.C. § 713(b)(1). The statute defines PREP as "a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C)." 42 U.S.C. § 713(b)(2).

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We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress. Tennessee's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Tennessee to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: "(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management."

delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Tennessee is directed to remove these and all similar language throughout their curricula and program materials. Should Tennessee fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families

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ADMINISTRATION FOR
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Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Tracy Gruber
Utah Department of Health and Human Services
195 North 1950 West
Salt Lake City, UT 84116

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301UTPREP), 2024 (#2401UTPREP), and 2025 (#2501UTPREP).

Dear Ms. Gruber:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Utah provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Utah's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Utah's PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if Utah's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Utah will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Get Real HS, 2nd edition, Curriculum

- Lesson 9.1 “Introduction to Sexuality,” pages 2-3:

“Define Sexuality and Sexual Health

Ask students what they think the term *sexuality* means. Emphasize that sexuality is not just about sex assigned at birth or sexual behavior, but is a combination of many elements, including relationships and communication. Explain that sexuality can include feelings about oneself and others, as well as values and beliefs, body awareness, intimacy, gender and sexual identity, and sexual health.

Teacher Note**Sex Assigned at Birth and Gender Identity**

Be sure to take a moment to explain the difference between sex assigned at birth and gender identity to students, as this may be the first time they’ve heard these terms. See Teacher’s Guide for definitions.”

- Lesson 9.4 “Gender and Sexual Identity,” page 25:

“Connecting the Lessons

Connects to Lesson 9.3: Sex, Gender and Shared Responsibility and Lesson 9.8: Healthy and Unhealthy Relationships

Lesson Goals

- Explain the importance of gender and sexual identity being self-identified.
 - Identify proper vocabulary for describing gender and sexual identity.
 - Explain the difference between sex assigned at birth, gender identity, gender expression and sexual orientation.
 - Discuss LGBTQ+ issues respectfully.
 - Demonstrate how to be an ally and to effectively communicate support for peers.”
- Page 29: “Explain that a person’s gender identity is how they define their own gender, which may or may not be the same as their sex assigned at birth; a person’s gender expression is how they share their gender with the world. Tell students that they all thought about their own gender identity, and potentially gender expression, when they chose what word or words to use for ‘gender’ in the last activity. Every person has a sex assigned at birth, agender identity, a way of expressing their gender, and a sexual orientation. And each of these is unique to every individual person.”
- Teacher’s Guide, Lesson 9.1, page 109: “Another important part of sexuality is gender identity. Gender identity is a term that refers to a person’s deeply personal

feeling of identifying as a man, woman or some other gender, which may or may not line up with the sex assigned to the person at birth.”

In Clued (2019), Utah Adapted Curriculum

- Youth Curriculum Overview, Workshop Activities, page 5:

“Introductions and Warm-Up (20 minutes)

Facilitators introduce themselves, the IN·clued workshop agenda and Essential Questions, and facilitate participant introductions. Participants commit to group agreements to maximize physical, emotional, and psychological safety during the learning experience. The Peer Educators read a welcoming poem depicting diverse sexual and gender identities to create a supportive environment for workshop participants. Participants spend time exploring their IN·clued zines.”

- Youth Workshop Curriculum, Page 11: “Preparation prior day of workshop:

Call LGBTQ+ youth group facilitator to ask about:

- Community-specific group language use (e.g. ‘Queer youth,’ ‘LGBTQ+ youth,’ ‘Gender-expansive youth,’ etc.)
- Group structure (meeting times, locations, number of youth, etc.)
- Already established group norms/agreements, if they have any
- Prior activities/experiences the group has had around sexual health education or accessing sexual healthcare
- Facilities—room set up, A/V equipment, room for breakout groups, etc.
- Group dynamics that would be useful to know”

- Activity 1, page 14: “ADULT FACILITATOR: Gather everybody’s attention and thank participants for being there. Introduce yourself with your name, pronouns (if you wish), your role, and why you care about LGBTQ+ sexual health. Introduce the purpose of the workshop.

‘We want to thank everybody for taking the time to be here today—we’re really excited to be working with you for the next few hours, and are grateful to be with you in this space. IN·clued is a program just for LGBTQ+ youth to learn about how to get the sexual health information and services they need and have the right to. We know that sometimes lesbian, gay, bisexual, transgender, and queer or questioning young people don’t have access to information and services that is for them. That’s why we’re here, to spend some time together talking about LGBTQ+ sexual healthcare in particular.’”

Making Proud Choices! 5th Edition, Curriculum

- Module 1, Activity B, Facilitator Note, page 36: “Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender

nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus ‘outing’ themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”

- Module 1, Activity C, Procedure, pages 39-40: “**Respect Diversity:** Let’s keep in mind that there’s diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren’t even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other’s may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

Young people may express themselves in ways that don’t conform with their biological sex. There are many ways that youth can express their gender identity.

Define terms related to diversity as needed.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples’ inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn’t fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics.”

Teen Outreach Program (TOP), Curriculum

- LAM-SU-A2, “Defining Sexuality” chapter, page 80:

“Facilitator Tip

Sexuality is complex and can be difficult to define. It is normal for participants to struggle to understand it broadly and to have differing views. Support participants in sharing and listening to one another, and make sure dialogue remains respectful and inclusive.

Circle ‘Sex’ in ‘Sexuality’

Ask

- How much of our Word Web is about ‘having sex’ or ‘sex’ as a physical behavior?

Share

- Sexuality is more than physical behavior.

Add

- Besides physical behavior, what else do you think could be part of a person’s sexuality?

If participants do not identify in the following, add

- Sexual and reproductive anatomy
- Body Image
- Biological sex
- Gender Including gender identity, gender expression and gender roles
- Sexual orientation
- Desires, pleasure, intimacy and reproduction
- Beliefs, attitudes and values about sexuality

Share

- Sexuality can include some or all these things.
- Sexuality is a personal experience and will be different for everyone.

- LAM-HW-F1, Facilitator Resource, “Frequently Asked Questions,” page 148:

“Why would someone with a penis not identify as a boy/man? Why would someone with a vulva not identify as a girl/woman?”

When we use body parts to describe people, we’re talking about ‘biological sex,’ or sex assigned at birth, which is different than gender. Gender is how people identify and express themselves. Transgender people are people whose gender identity is different from their biological sex or sex assigned at birth. Gender non-conforming and non-binary people are people whose gender identities are not exclusively either boy/man or girl/woman. However someone identifies, they should feel safe, respected and included in TOP.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress. Utah's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Utah to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Utah is directed to remove these and all similar language throughout their curricula and program materials. Should Utah fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: "(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management."

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Nakia Martin-Wright at nakia.martin-wright@acf.hhs.gov.

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large, stylized 'A' and 'G'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Mr. Paul Daley
Vermont Department of Health
108 Cherry Street
Burlington, VT 05401

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2101VTPREP), 2024 (#2301VTPREP), and 2025 (#2301VTPREP).

Dear Mr. Daley:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Vermont provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Vermont's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Vermont's PREP curricula and program materials:¹

Making Proud Choices! 5th edition, Facilitator Curriculum

- Module 1, Activity B Procedure, page 36: "Facilitator's Note: Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some

¹ ACF initiated a medical accuracy review to determine if Vermont's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Vermont will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

youth may not feel comfortable sharing their pronouns and thus ‘outing’ themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”

- Module 1, Activity C Procedure, pages 39-40: “Define terms related to diversity as needed.

I want to be sure everyone understands some of the terms we use when talking about diversity.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples’ inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn’t fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics.”

Vermont Supplemental “Supporting LGBTQIA+ Youth” (2016), Teacher Manual

- Page 11: “Synopsis - In this class, students learn that they are about to participate in a program to reduce risks for unplanned pregnancy and STI/HIV. They learn that this particular class is designed to set a tone that makes the upcoming lessons relevant for everyone. Students complete a worksheet and participate in a discussion about self-identity. Then the teacher leads a discussion about sexual identity, which is one part of self-identity. Students learn about gender identity, sexual attraction and orientation, and sexual behaviors. Students then apply their learning by reading (or listening to) vignettes and answering questions about the protagonists’ gender identities, attractions, and family and peer support.”
- Page 17: “Transgender women and cisgender women are both women. Transgender men and cisgender men are both men. The use of cisgender helps clarify that gender identity exists in both cisgender and transgender people.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted

infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. Vermont’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Vermont to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Vermont is directed to remove these and all similar language throughout their curricula and program materials. Should Vermont fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Richy Richard, richy.richard@acf.hhs.gov.

(allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Gradison". The signature is written in a cursive style with a large initial 'A'.

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



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Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Natalie L. Bailey
Administrator, DFA
Department of Human Services
41 B Mars Hill, Frederiksted
St. Croix, Virgin Islands

RE: Personal Responsibility Education Program for Fiscal Years 2023 (2301VIPREP),
2024 (2401VIPREP), and 2025 (2501VIPREP).

Dear Ms. Bailey:

On April 14, 2025, the Administration for Children and Families (ACF) requested that the Virgin Islands provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing the Virgin Islands' PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from the territory's PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if the territory's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, the Virgin Islands will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Reducing the Risk, Teacher Manual, 5th ed.

- Page 14: “Be sure your reading of the roleplay allows for inclusivity and does not reinforce one view of gender identity or gender stereotypes. You can do this by introducing Lee and Lee as a couple without specifying their genders, by not differentiating the two Lees’ lines using stereotypical male and female voices, and by leaving it open as to which Lee is pressuring and which does not want to have sex.”
- Class 4, “Roleplay in Small Groups,” page 71. “Note to the Teacher: Over the course of the roleplay activities, students will be in a position where they must roleplay sexual pressure situations with classmates of both a different and the same gender. This may be awkward for teens who are sensitive to the suggestion of same-sex romance, for teens who identify as gay or lesbian, or for teens who are transgender or gender nonconforming. It’s important to address this situation directly and proactively. Here are some tips:
 - Explain the situation in a matter-of-fact way. Let students know that every student in the class will, at some point, be doing a roleplay with a classmate of a different gender and with a classmate of the same gender. Most likely, they will do this several times.
 - Explain that they need to take their roles seriously because teens of all sexual orientations and gender identities need to learn how to resist sexual pressure and protect themselves. This will help ensure that they and their classmates get the most out of the role play activities.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress. The Virgin Island's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs the Virgin Islands to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute; we are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Shakira Williams at shakira.williams@acf.hhs.gov.

The Virgin Islands is directed to remove these and all similar language throughout their curricula and program materials. Should the territory fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families



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Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Mary Clark
Washington State Department of Health
111 Isreal Road
Olympia, WA 98504

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301WAPREP), 2024 (#2301WAPREP), and 2025 (#2501WAPREP).

Dear Washington State Department of Health:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Washington State provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Washington's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Washington's PREP curricula and program materials:¹

Rights, Respect, Responsibility (2024), Teacher's Guide (K – 12)

- Page 20: **“Teaching about Gender Identity in School Is Age-Appropriate**

¹ ACF initiated a medical accuracy review to determine if Washington's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Washington will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Everyone has a gender identity. Most people’s sense of their gender (known as their gender identity) matches their sex assigned at birth. For some, however, their sense of their gender does not match their sex assigned at birth. Most typically, children between the ages of 18 months and 2 to 3 years begin to articulate some understanding of their gender identity, and children have a clear sense of their gender identity by age 4 or 5. At these ages, children also begin to develop speech and may begin to communicate how they understand gender. Often, transgender children will state with confidence at young ages, ‘I am a boy’ or ‘Do not call me ‘a girl.’

The lessons in *Rights, Respect, Responsibilities* are specifically written to challenge the gender binary and to be inclusive, respectful, and supportive of all gender expressions. There are many great resources offering additional ways for teachers to support transgender and non-binary students. They include:

- Advocates for Youth *Trans-Affirming Schools Project Resource Guide*
- Gay, Lesbian and Straight Education Network (GLSEN)
- *The Teaching Transgender Toolkit* available for purchase at www.teachingtransgender.com.”

Puberty: The Wonder Years (Grades 4-6)

- Lessons and Student Learning Objectives (Slides)
“Lesson 4-3 Respecting our Friends: Gender
Students will be able to:
 - Define at least three of five terms used to describe gender identity and gender expression during a matching game
 - Demonstrate the respectful use of at least two gender-related terms while discussing student scenarios that illustrate gender diversity with peers and include respectful body language, words, and tone of voice.”

UnHushed

- “Kindergarten—Session 02: Gender Jamboree [no page number]:

PURPOSE

This session leads participants through an exploration of gender as it relates to their own identity and the world around them.

OBJECTIVES

As a result of this session, participants will be able to:

- Identify their own gender identity.
- Name at least three gender identities.

KEY MESSAGES

- Some people are boys, some people are girls, some people are both, and some
- people are neither.
- People can have a gender, but objects or activities cannot (e.g., colors, sports, toys).
- The ‘right’ way to show the world your gender is the way that feels best to you.”

Positive Prevention Plus (2021), High School Curriculum and Teacher’s Guide

- Page 39: “Understanding the Terms:

Human sexuality is a combination of three distinct components.

- **Biological Sex:** A term used to denote whether an individual is male or female, as determined by a physician or other medical professional at time of birth. This designation is often made solely based upon an examination of an infant’s genitals, but may also involve chromosomes and gonads (ovaries or testicles.) Related term: *intersex*.
- **Gender:** Attitudes, feelings, characteristics and behaviors that a given culture associates with being male or female and that are often labeled as “masculine” or “feminine.” Related terms include gender role, gender non-conforming, gender identity, cisgender, transgender, gender expression, gender binary, gender expansive.
- **Sexual Orientation:** A person’s romantic or sexual attraction to people of another and/or same gender. Common terms used to describe sexual orientation include, but are not limited to: heterosexual, lesbian, gay, bisexual, pansexual, queer.

Biological sex, gender, and sexual orientation vary with each individual. It is important to respect differences and appreciate diversity.”

FLASH (2022), Elementary Curriculum

- Lesson 4, Page 2: “Gender & gender roles, recognizing the differences and similarities between males and females, boys and girls, men and women, is an integral part of understanding who we are as individuals and where we fit in our world. Gender consists of an individual’s gender identity (whether they think of themselves as male or female, a man or a woman, a guy or a girl) and their gender expression (whether the ways they dress, walk, talk, and otherwise demonstrate more comfort with traditionally or stereotypically masculine or feminine ways of

moving through the world . . . or neither or some of each). Students will consider the advantages of being male or female, exploring some of the cultural role expectations that accompany gender issues in our society.”

FLASH (2024), High School Curriculum

- Toolkit, page 13:
 - “Everyone has a sexual orientation and a gender identity.
 - A person knows their sexual orientation because of who they feel attracted to.
 - A person knows their gender identity because they feel like a boy, a girl, both, neither or somewhere in between.
 - People of all sexual orientations and gender identities need to know how to prevent pregnancy and STOs, either for themselves or to help a friend.”
- Toolkit, pages 14-15: “LGBT Inclusivity
 - “Teaching about sexual orientation and gender identity creates better understanding and respect among all students and creates a climate where discrimination is unwelcome. It also provides a necessary protection for lesbian, gay, bisexual, trans, and queer (LGBTQ) students. The FLASH curriculum has been shown through rigorous evaluation to significantly reduce homophobia and transphobia among high school students (Kesler et al., 2023). It is important for educators to routinely teach inclusively, as every classroom will likely have students who identify (or will later identify) as LGBTQ, as well as students with family and friends who identify as LGBTQ.”
- Lesson 4, pages 5-6, “Sexual orientation and gender identity
 - When a baby is born, the doctor usually says the baby is male or female, depending on the appearance of the baby's genitals. This is the baby's assigned sex.
 - The assigned sex of babies with a vagina, clitoris, and XX chromosomes is usually female.
 - The assigned sex of babies with a penis, scrotum, and XY chromosomes is usually male.
 - Some babies are born with variations in their genitals, reproductive organs, or chromosomes. This is called intersex. The doctor will usually assign a sex of male or female, although people may identify differently as they get older.
 - Gender identity is a deep feeling people have about whether they are a guy, a girl, both, neither, or somewhere in between.
 - People often know their gender identity when they are very little, before they start kindergarten, although everyone is different and some people will know when they are younger or older.

- Cisgender is when a person's gender identity is the same as their assigned sex. For example, a doctor says, 'It's a girl!' at a baby's birth, and that child later feels 'Yes, I am a girl.'
- Transgender is when a person's gender identity is not the same as their assigned sex. For example, a doctor says, 'It's a girl!' at a baby's birth, and that child later feels 'No, I'm not a girl.' People may also identify as nonbinary, genderqueer, or some other gender identity."

The "purpose" of a PREP grant award is for states to "carry out personal responsibility education programs consistent with this subsection." 42 U.S.C. § 713(b)(1). The statute defines PREP as "a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C)." 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress. Washington's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Washington State to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: "(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management."

program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Washington is directed to remove these and all similar language throughout their curricula and program materials. Should Washington fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Chéri Thompson at Cheri.Thompson@acf.hhs.gov.



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Tara Buckner
West Virginia Department of Health and Human Resources
Bureau for Public Health
State Capitol Complex, Building 3, Room 206
Charleston, WV 25301

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301WVPREP), 2024 (#2401WVPREP), and 2025 (#2501WVPREP).

Dear Ms. Buckner:

On April 14, 2025, the Administration for Children and Families (ACF) requested that West Virginia provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing West Virginia's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from West Virginia's PREP curricula and program materials:¹

Making Proud Choices! 5th Edition, Facilitator Curriculum

- Module 1, Activity B, Facilitator's Note, page 36: "Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender

¹ ACF initiated a medical accuracy review to determine if West Virginia's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, West Virginia will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus “outing” themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don’t always line up with what observers might expect based on a person’s perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group.”

- Module 1, Activity C, Procedure, pages 39-40: “**Respect Diversity:** Let’s keep in mind that there’s diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren’t even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other’s may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

Young people may express themselves in ways that don’t conform with their biological sex. There are many ways that youth can express their gender identity.

Define terms related to diversity as needed.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples’ inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn’t fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics.”

Reducing the Risk, 5th edition, Facilitator Curriculum

- Class 1A, Outline of Activities, page 14: “Be sure your reading of the roleplay allows for inclusivity and does not reinforce one view of gender identity or gender stereotypes. You can do this by introducing Lee and Lee as a couple without specifying their genders, by not differentiating the two Lees’ lines using stereotypical male and female voices, and by leaving it open as to which Lee is pressuring and which does not want to have sex.”

- Class 4, Note to the Teacher, page 71: “Over the course of the roleplay activities, students will be in a position where they must roleplay sexual pressure situations with classmates of both a different and the same gender. This may be awkward for teens who are sensitive to the suggestion of same-sex romance, for teens who identify as gay or lesbian, or for teens who are transgender or gender nonconforming. It’s important to address this situation directly and proactively.

Here are some tips:

- Explain the situation in a matter-of-fact way. Let students know that every student in the class will, at some point, be doing a roleplay with a classmate of a different gender and with a classmate of the same gender. Most likely, they will do this several times.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency’s authority to administer the program consistent with the authorizing legislation as enacted by Congress. West Virginia’s current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs West Virginia to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ West Virginia is directed to remove these and all similar language throughout their curricula and program materials. Should West Virginia fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Nakia Martin-Wright at Nakia.Martin-wright@acf.hhs.gov.



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Kara Benjamin
Wisconsin Department of Health
1 West Wilson Street, Room 250
Madison, WI 53707

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301WIPREP), 2024 (#2401WIPREP), and 2025 (#2501WIPREP).

Dear Ms. Benjamin:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Wisconsin provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Wisconsin's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Wisconsin's PREP curricula and program materials:¹

High School FLASH, Third Edition, Educator Manual

- Page 4: Lesson 4, "Sexual Orientation and Gender Identity"
 1. Let's start with **assigned sex**.

¹ ACF initiated a medical accuracy review to determine if Wisconsin's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Wisconsin will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

- When a baby is born, the doctor usually says the baby is male or female, depending on the appearance of the baby's genitals. This is the baby's assigned sex.
- The assigned sex of babies with a vagina, clitoris, and XX chromosomes is usually female.
- The assigned sex of babies with a penis, scrotum, and XY chromosomes is usually male.
- Some babies are born with variations in their genitals, reproductive organs, or chromosomes. This is called intersex. The doctor will usually assign a sex of male or female, although people may identify differently as they get older.

If someone asked you to summarize assigned sex, what would you say? Who is it assigned by? Right, it's when the doctor says, 'It's a boy' or 'It's a girl,' depending on the baby's genitals. Good job. Any questions.

2. Let's move on to gender identity. While assigned sex is based on the body parts the doctor sees at birth, gender identity has nothing to do with body parts.

- Gender identity is a deep feeling people have about whether they are a guy, a girl, both, neither, or somewhere in between.
- People often know their gender identity when they are very little, before they start kindergarten, although everyone is different and some people will know when they are younger or older.
- Cisgender is when a person's gender identity is the same as their assigned sex. For example, a doctor says, 'It's a girl!' at a baby's birth, and that child later feels 'Yes, I am a girl.'
- Transgender is when a person's gender identity is not the same as their assigned sex. For example, a doctor says, 'It's a girl!' at a baby's birth, and that child later feels 'No, I'm not a girl.' People may also identify as nonbinary, genderqueer, or some other gender identity.

So how is gender identity different than assigned sex? Correct, gender identity is based on a deep feeling that a person has about themselves."

Making Proud Choices! 5th edition, Teacher's Manual

- Module 1, Activity B, Procedure, Facilitator Note, page 36: "Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus "outing" themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don't always line up with what observers might expect based on a person's perceived biological sex. The simple act of requesting pronouns sends

the message that transgender and gender nonconforming youth are welcome and respected in the group.”

- Module 1, Activity C, Procedure, page 39-40: “**Respect diversity:** Let’s keep in mind that there’s diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren’t even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other’s may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender.

Young people may express themselves in ways that don’t conform with their biological sex. There are many ways that youth can express their gender identity.”

Young people may express themselves in ways that don’t conform with their biological sex. There are many ways that youth can express their gender identity.

Define terms related to diversity as needed.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples’ inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn’t fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics.”

Positive Prevention Plus (2021), Teacher’s Manual

- Lesson 2, Gender and Sexual Orientation, page 35:

“CONTENT

- Introduction
- Gender and Sexual Orientation
- LGBTQ+ Bias and Its Effects
- Lesson Wrap-Up (Worksheet)

OBJECTIVE

- Define and discuss gender-related terms.

- Identify the importance of acknowledging and accepting diverse gender presentations and sexual orientations.”
- Lesson 2, Gender and Sexual Orientation, Part B, page 39, “**Understanding the Terms**

Human sexuality is a combination of three distinct components.

- **Biological Sex:** A term used to denote whether an individual is male or female, as determined by a physician or other medical professional at the time of birth. This designation is often made solely based upon the examination of an infant’s genitals, but may also involve chromosomes and gonads (ovaries or testicles). Related term: *intersex*.
- **Gender:** Attitudes, feelings, characteristics and behaviors that a given culture associates with being male or female and that are often labeled as ‘masculine’ or ‘feminine.’ Related terms include: *gender role, gender non-conformity, gender identity, cisgender, transgender, gender expression, gender binary, gender expansive*.
- **Sexual Orientation:** A person’s romantic or sexual attraction to people of other and/or the same gender. Common terms used to describe sexual orientation include, but are not limited to: *heterosexual, lesbian, gay, bisexual, pansexual, and queer*.

Biological sex, gender, and sexual orientation vary with each individual. It is important to respect differences and appreciate diversity.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: “(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management.”

teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

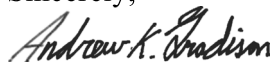
We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress. Wisconsin's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Wisconsin to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Wisconsin is directed to remove these and all similar language throughout their curricula and program materials. Should Wisconsin fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60) days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,



Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Arlisa Britt, arlisa.britt@acf.hhs.gov.



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, DC 20201 | www.acf.hhs.gov

Tuesday, August 26, 2025

Ms. Stefan Johansson
Wyoming Department of Health
Maternal and Child Health Unit
122 West 25th Street, 3rd Floor West
Cheyenne, WY 82002

RE: State Personal Responsibility Education Program grants for Fiscal Years 2023 (#2301WYPREP), 2024 (#2401WYPREP), and 2025 (#2501WYPREP).

Dear Ms. Johansson:

On April 14, 2025, the Administration for Children and Families (ACF) requested that Wyoming provide current curricula and programmatic materials in use or in any way relevant to your state Personal Responsibility Education Program (PREP) grant for a medical accuracy review in accordance with the Terms and Conditions of the grant. We appreciate your timely response to ACF's request.

While preparing Wyoming's PREP content for the medical accuracy review, ACF identified content in the curricula and other program materials that fall outside of the scope of PREP's authorizing statute at 42 U.S.C. § 713. Specifically, the following subjects and language are outside the scope of the authorizing statute and all references to it must be removed from Wyoming's PREP curricula and program materials:¹

¹ ACF initiated a medical accuracy review to determine if Wyoming's approach to biological sex in its PREP curricula is medically accurate and in compliance with the program statute and the terms and conditions of the award. In preparing the materials that we received, we saw that the curricula include gender ideology which is not authorized by the statute. As per this letter, Wyoming will need to remove this content from its PREP curricula and program materials. In light of this, we are changing our planned course of action and are no longer conducting a review for medical accuracy because the content that we were going to review for medical accuracy is outside of the subjects that are statutorily authorized in this program.

Making Proud Choices, 5th Edition, Facilitator Manual

- Page 36 (Module 1, Activity B Procedure, Facilitator's Note): "Asking participants to tell you their pronouns is a way of creating a safe space for transgender or gender nonconforming youth. Reinforce that sharing pronouns is optional; some youth may not feel comfortable sharing their pronouns and thus 'outing' themselves. Model what you want participants to say by giving your own pronouns. Some transgender youth might have typical pronouns (he/she/his/her/their) or they might request more creative pronouns such as hir or zir. Pronouns don't always line up with what observers might expect based on a person's perceived biological sex. The simple act of requesting pronouns sends the message that transgender and gender nonconforming youth are welcome and respected in the group."
- Pages 39-40 (Module 1, Activity C Procedure): "**Respect diversity:** Let's keep in mind that there's diversity in society and in the group. Individuals come from different family backgrounds, different racial and cultural groups and different living situations. Some young people have already had romantic relationships; others aren't even thinking about it. Some have had sexual intercourse. Some have had sex because they choose to; other's may have had sex against their will. Some may identify as gay, lesbian, bisexual or straight. Some may identify as male, female or transgender."

Young people may express themselves in ways that don't conform with their biological sex. There are many ways that youth can express their gender identity. .
..

Define terms related to diversity as needed.

I want to be sure everyone under understands some of the terms we use when talking about diversity.

Gender refers to the ideas in a culture or society about the appropriate ways for men and women to dress, behave, think and feel. Ideas about what gender behavior is appropriate change in different cultures and at different times in history. Sometimes one gender is given more power or status than another.

Gender identity is peoples' inner understanding of what gender they identify with. It may be man, woman, something in between, or something that doesn't fit these labels. It may be the same as (cisgender) or different from (transgender) the sex they were assigned at birth. Gender identity is unique for each person.

Gender expression is how a person represents or expresses gender identity to others, often through behavior, clothing, hairstyles, voice or body characteristics."

Power Through Choices, 5th Edition, Facilitator Manual

- Preface, page iv: “Gender Inclusivity: *Power Through Choices* was designed to assist youth in developing the decision-making skills and self-efficacy to prevent pregnancy, HIV, and STIs, regardless of their gender, sexual identity, or sexual orientation. To be inclusive of the diversity found in the systems of care community, the curriculum includes gender-inclusive language, such as the pronouns ‘they/them/theirs’ rather than ‘she/her/hers’ or ‘he/him/his,’ characters with same-gender sexual experience, and language that does not reflect gender bodies and body parts.”

Reducing the Risk, Revised 5th Ed., Facilitator Manual

- Page 14, Class 1A, Outline of Activities, Note to Teacher: “Be sure your reading of the roleplay allows for inclusivity and does not reinforce one view of gender identity or gender stereotypes. You can do this by introducing Lee and Lee as a couple without specifying their genders, by not differentiating the two Lees’ lines using stereotypical male and female voices, and by leaving it open as to which Lee is pressuring and which does not want to have sex.”
- Page 71, Class 4, Activities, “Roleplay in Small Groups, Note to Teacher: Over the course of the roleplay activities, students will be in a position where they must roleplay sexual pressure situations with classmates of both a different and the same gender. This may be awkward for teens who are sensitive to the suggestion of same-sex romance, for teens who identify as gay or lesbian, or for teens who are transgender or gender nonconforming. It’s important to address this situation directly and proactively.

Here are some tips:

Explain the situation in a matter-of-fact way. Let students know that every student in the class will, at some point, be doing a roleplay with a classmate of a different gender and with a classmate of the same gender. Most likely, they will do this several times.”

The “purpose” of a PREP grant award is for states to “carry out personal responsibility education programs consistent with this subsection.” 42 U.S.C. § 713(b)(1). The statute defines PREP as “a program that is designed to educate adolescents on -- (i) both abstinence and contraception for the prevention of pregnancy and sexually transmitted infections, including HIV/AIDS, consistent with the requirements of subparagraph (B); and (ii) at least 3 of the adulthood preparation subjects described in subparagraph (C).” 42 U.S.C. § 713(b)(2).

The statute includes no mention of gender ideology, which is both irrelevant to teaching abstinence and contraception and unrelated to any of the adult preparation subjects

described in section 713(b)(2)(C).² The statute neither requires, supports nor authorizes teaching students that gender identity is distinct from biological sex or that boys can identify as girls and vice versa; thus, gender ideology is outside the scope of the authorizing statute and any expenditures associated with gender ideology are not allowable, reasonable, or allocable to the PREP grant. See 45 C.F.R. §§ 75.403-405.

We are aware that these curricula and other program materials were previously approved by ACF. However, the prior administration erred in allowing PREP grants to be used to teach students gender ideology because that approval exceeded the agency's authority to administer the program consistent with the authorizing legislation as enacted by Congress.

Wyoming's current PREP curricula and program materials are out of compliance with the PREP statute and HHS regulations and must be modified. See 45 C.F.R. § 75.303(b) (requiring compliance with all Federal statutes, regulations, and the terms and conditions of the Federal award), §§ 75.403-405 (requiring grant expenditures to be reasonable and allocable in order to be allowable). ACF may impose additional conditions on grantees that fail to comply with any Federal statutes, regulations or terms and conditions that apply to their awards. See 45 C.F.R. § 75.371.

Therefore, ACF instructs Wyoming to remove all content concerning gender ideology from its curricula, program materials and any other aspects of its program delivery within 60 days of receipt of this letter and provide a copy of the modified materials to ACF for approval.

The content flagged on the pages of this letter provides examples of gender ideology content that does not adhere to the PREP statute;³ Wyoming is directed to remove these and all similar language throughout their curricula and program materials. Should Wyoming' fail to make the appropriate modifications to its PREP curricula and program materials, ACF may take additional enforcement action. See 45 C.F.R. § 75.371 (allowing HHS to withhold, disallow, suspend, or terminate Federal awards if imposing additional conditions on a grantee does not cure noncompliance).

Thank you for your attention to this matter. Please submit the modified curricula and materials by uploading to the Dropbox links previously provided to you within sixty (60)

² 42 U.S.C. § 713(b)(2)(C) lists the following adult preparation subjects: "(i) Healthy relationships, including marriage and family interactions; (ii) Adolescent development, such as the development of healthy attitudes and values about adolescent growth and development, body image, racial and ethnic diversity, and other related subjects; (iii) Financial literacy; (iv) Parent-child communication; (v) Educational and career success, such as developing skills for employment preparation, job seeking, independent living, financial self-sufficiency, and workplace productivity; (vi) Healthy life skills, such as goal-setting, decision making, negotiation, communication and interpersonal skills, and stress management."

³ We are not setting forth all of the problematic language in this letter but are providing a general description and examples so that you understand what needs to be removed from the curricula and program materials. If you have any questions about whether language needs to be removed, please contact the Federal Project Officer, Arlisa Britt, arlisa.britt@acf.hhs.gov.

days, and no later than **Monday, October 27, 2025**, at 11:59 pm. You may email your FYSB Federal Project Officer if you need clarification regarding this request.

Sincerely,

A handwritten signature in cursive script that reads "Andrew K. Gradison".

Andrew Gradison
Acting Assistant Secretary
Administration for Children and Families