



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034  
Washington, DC 20201 | [www.acf.hhs.gov](http://www.acf.hhs.gov)

Tuesday, August 26, 2025

Kathy Jo Stence, Director  
Pennsylvania Department of Health  
7<sup>th</sup> 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:<sup>1</sup>

**Making Proud Choices! 5th Edition, Facilitator Curriculum California**

- Page 31, Pre-Module, Setting the Stage: Sexual Diversity and Healthy Relationship (Learning Objectives):

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<sup>1</sup> 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).<sup>2</sup> 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;<sup>3</sup> Pennsylvania is directed to remove

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<sup>2</sup> 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.”

<sup>3</sup> 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](mailto: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