



Planned Parenthood Federation of America, Inc.

August 15, 2025

VIA ELECTRONIC TRANSMISSION

Lauren Supplee
Deputy Assistant Secretary
Office of Planning, Research, and Evaluation, Administration for Children and Families
U.S. Department of Health and Human Services
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Dear Deputy Assistant Secretary Supplee,

Planned Parenthood Federation of America (PPFA) submits this comment letter in response to the Proposed Information Collection Activity; Sexual Risk Avoidance Education Program Performance Analysis Study, released by the U.S. Department of Health and Human Services (HHS), Administration for Children and Families (ACF), Office of Planning, Research, and Evaluation (OPRE), and published in the federal register on June 16, 2025. PPFA submits comments on proposals that would impact the overall health and wellbeing of the communities that Planned Parenthood members serve across the country.

PPFA is a 501(c)(3) charitable organization that serves as the nation's leading sexual and reproductive health care advocate and supports the independently incorporated Planned Parenthood members operating health centers (Planned Parenthood health centers) in communities across the United States. Planned Parenthood health centers¹ are trusted sources of health care for people of all genders, and they are also the nation's largest sex educator and provider of information on healthy relationships.

In 2023, Planned Parenthood members reached over 1.3 million people through sex education, outreach, and training programs, and millions more online. Each year, Planned Parenthood health centers also provide affordable birth control, lifesaving cancer screenings, testing and treatment for sexually transmitted infections (STIs), abortion, and other essential care to more than two million patients. Notably, one in three women in the United States has been to a Planned Parenthood health center. The majority (65%) of Planned Parenthood patients have incomes at or below 150 percent of the Federal Poverty Level.

As a trusted sexual and reproductive health advocate and national representative for Planned Parenthood health centers, PPFA submits this comment letter to oppose ideological changes that OPRE and ACF propose to make to this information collection and federal sex education programs.

¹ Planned Parenthood health centers are 501(c)(3) charitable organizations.

PPFA Opposes Harmful Changes to Sex Education Grants

The evidence shows that SRAE does not positively impact teens' sexual behaviors and is a waste of taxpayer funds.² While teens who participate in SRAE may respond to this information collection that they "intend" to avoid sex—giving the illusion that the program is working—in reality, teens' intentions to avoid sexual activity often fail, leading to less condom use and similar STI rates as teens who do not report that they intend abstinence.³ Due to SRAE's lack of effectiveness, lawmakers in Congress have introduced legislation⁴ to end the program and replace it with more impactful sex education that covers a wide range of topics, including abstinence as well as contraception.⁵

Yet OPRE proposes to make this bad program even worse through ill-advised changes to SRAE's information collection based in politics and ideology,⁶ not evidence. First, OPRE proposes to halt the expansion of information collection about gender identity of participants and restrict participants' answers about their gender to the binary choice of "Male" or "Female." It is undeniable that intersex, nonbinary, and transgender youth populations exist and are an audience for sexual education. Moreover, these young people face disparities in sexual health: condom use is lower among transgender and gender-questioning youth,⁷ and transgender youth experience significantly higher rates of STIs and HIV.⁸ LGBTQ+ youth are also more likely to experience sexual violence⁹ and more likely to have their first heterosexual intercourse before age 14.¹⁰ Ignoring and excluding these populations of young people who have high risks runs counter to SRAE's stated goals of sexual risk avoidance and optimum health.

Also, PPFA would like to take this opportunity to raise ACF's latest Notice of Funding Opportunity (NOFO) for SRAE projects that makes harmful, ideological changes. ACF weakens the evidence requirements for medical accuracy by allowing project materials

² The last HHS impact study released to the public in 2007 about Title V abstinence education found it had no impact on teens' sexual behaviors, including abstinence, number of sexual partners, age at first intercourse, and condom use. More broadly, a study of 37 systematic reviews—incorporating 224 randomized controlled trials—concluded that abstinence-only sex education programs like SRAE do not positively impact sexual behavior. Christopher Trenholm, et al., [Impacts of Four Title V, Sec. 510 Abstinence Ed. Programs](#), Mathematica Pol'y Rsch. Inc., Submitted to U.S. Dept. of Health & Human Servs. (Apr. 2007); Sarah Denford, et al., [A Comprehensive Rev. of Revs. of Sch.-Based Interventions to Improve Sexual Health](#), 1 *Health Psych. Rev.* 33-52 (Nov. 2016).

³ See Hannah Bruckner & Peter Bearman, [After the Promise: The STD Consequences of Adolescent Virginity Pledges](#), 36(4) *J. Adolescent Health* 271-78 (2005); Hannah Bruckner & Peter Bearman, [Promising the Future: Virginity Pledges & First Intercourse](#), 106(4) *Am. J. of Sociology* 859-912 (Jan. 2001).

⁴ See e.g. Real Educ. & Access for Healthy Youth Act of 2025, H.R. 3527, 119th Cong. (2025).

⁵ Decades of research show that comprehensive sex education programs have significantly more favorable effects than abstinence-only programs on behaviors like abstinence, number of sex partners, frequency of sexual activity, and use of condoms and contraception. See John S. Santelli, et al., [Abstinence-Only-Until Marriage: An Updated Rev. of U.S. Policies & Programs & Their Impact](#), 61(3) *J. of Adolescent Health* 273-80 (Sept. 2017).

⁶ OPRE states that this is a "non-substantive change" to align the information collection with President Trump's executive orders regarding transgender identities and diversity, equity, and inclusion.

⁷ Gregory Phillips, et al., [Disparities in HIV Testing, Condom Use, & HIV Educ. Between Transgender & Not-Transgender High School-Aged Youth: Findings From the 2019 Youth Risk Behavior Survey](#), 50 *Health Educ. & Behavior* 29-40 (July 5, 2023).

⁸ Sari L. Reisner, et al., [Situating Vulnerabilities, Sexual Risk, & Sexually Transmitted Infections' Diagnoses in a Sample of Transgender Youth in the U.S.](#), 33 *AIDS Patient Care and STDs* 120-30 (Mar. 7, 2019).

⁹ HHS & Cntrs. for Disease Control, [Youth Risk Behavior Survey, Data Summary & Trends Report](#), 2013-2023 (Aug. 4, 2024).

¹⁰ HHS Off. of Population Affairs, Off. of Adolescent Health, [Understanding LGBTQ Youth & Ensuring Inclusivity in Teen Pregnancy Prevention Programs](#) (2015).

approved by unnamed “expert agencies and organizations” rather than only those backed by scientific research, such as the Teen Pregnancy Prevention Evidence Review.¹¹ ACF strips requirements that SRAE is “trauma-informed,” “inclusive (for LGBTQ youth and others),” and “linguistically appropriate.”¹² The NOFO adds a new prohibition on referrals for “abortion-related services” or “diversity, equity, and inclusion” activities. At the same time, HHS is also undermining young peoples’ access to other federal sex education programs by inserting similar ideological preferences into the Teen Pregnancy Prevention Program¹³ and the Personal Responsibility Education Program (PREP).¹⁴

Planned Parenthood Federation of America strongly urges ACF to put the health and lives of young people in this country—including women and girls, people of color, people with disabilities, LGBTQ+ communities—first and foremost, and to work towards fulfilling, rather than undermining, HHS’ core mission of improving the health and wellbeing of all people. For these reasons, PPFA urges OPRE and ACF to abandon its harmful changes to SRAE and other sex education projects.

Respectfully,

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Laurel Sakai
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Planned Parenthood Federation of America

¹¹ [Updated Findings from the HHS Teen Pregnancy Prevention Evidence Rev.](#), HHS Off. of the Ass’t Sec’y for Health & Admin. for Children & Fams. (accessed Aug. 11, 2025).

¹² Dept. of Health & Human Servs, Admin. for Children & Fams., Fam. & Youth Servs. Bureau, [Grants Notice: Title V Competitive Sexual Risk Avoidance Educ.](#), (July 8, 2025).

¹³ [Press Release: Five Planned Parenthood Affiliates Sue Trump Admin. Over Attacks on Teen Pregnancy Prevention Program](#), Planned Parenthood Fed’n of America (May 1, 2025); HHS Off. of the Ass’t Sec’y for Health, [OASH Teen Pregnancy Prevention Program Policy Notice 2025 – 01](#) (July 1, 2025).

¹⁴ Dept. of Health & Human Servs, Admin. for Children & Fams., [ACF Instructs Cal. to Modify Sex-Ed Content Riddled with Gender-Ideology in 60 Days](#) (June 20, 2025).