



# PROMISES KEPT: PROTECTING AMERICAN CHILDREN FROM CHEMICAL AND SURGICAL MUTILATION

January 27, 2026

## A GOVERNMENT-WIDE MANDATE TO END CHILD MUTILATION

The Trump Administration has set out to purge gender ideology from the federal government and dismantle the social institutions that indoctrinate children as well as to ban the practice of child chemical and surgical mutilation and impose sufficient pressure on the medical community to abandon it as a discipline. Given the irreversible consequences of these procedures, it's not surprising that President Trump's policies command robust support—polls show that [56% of Americans favor banning](#) interventions like puberty blockers, hormone therapies and surgeries on children.<sup>1</sup>

### **PRESIDENT TRUMP DECLARES AN END TO CHILD MUTILATION DAYS AFTER INAUGURATION.**

President Trump has worked expeditiously to fulfill a touchstone pledge of his 2024 campaign: protecting children from genital mutilation and sterilizing medical procedures. Established under a series of executive orders (EOs), President Trump's agenda re-anchors federal policy in the reality of biological sex and sets out to dismantle the study and practice of sex-rejecting procedures (SRPs) on minors.

#### **Purging Indoctrination and Restoring Biological Reality**

- ★ Under [EO 14148](#), President Trump rescinded 10 EOs issued by President Biden that shoehorned arbitrary gender and DEI theories into personnel decisions; education and health policy; grants and contracts; and civil rights enforcement.<sup>2</sup> Likewise, EOs [14151](#) and [14173](#) affirmatively bars gender- and DEI-based considerations in federal employment practices and funding decisions.<sup>3</sup>
- ★ EOs [14190](#), [14201](#), and [14168](#) direct agencies to revoke federal support of K-12 gender indoctrination, restore sex-based enforcement of Title IX in education and athletics, and remove gender-ideology language from agency regulations, forms, and grant conditions.<sup>4</sup>

#### **Dismantling Mutilation as a Discipline and Banning its Practice**

- ★ EO 14187, [Protecting Children From Chemical and Surgical Mutilation](#), admonishes pediatric SRPs as “junk science,” expressly condemning the World Professional Association of Transgender Health (WPATH).<sup>5</sup> Recognizing WPATH as the de facto standard-setting authority for providers who mutilate children, the Order directs agencies to rescind reliance on WPATH guidance and terminate any federal support of the organization.
- ★ Further, the Order directs agencies to cut all federal funding for projects that support the study or practice of chemical and surgical mutilation of children, agencies that administer federal health insurance programs to terminate coverage of SRPs performed on minors.

### **THE MAHA INTERVENTION: SECRETARY KENNEDY'S REFORMS COULD MEAN THE END OF CHILD MUTILATION IN THE U.S.**

Consistent with EO 14187, Secretary Kennedy is making good on his promise to “[stop unsafe, irreversible practices that put our children at risk](#).”<sup>6</sup> The Centers for Medicaid and Medicare Services (CMS) has proposed rules to end federal coverage of child mutilation under Medicaid and the Children's Health Insurance Program (CHIP) and bar its performance at certified hospitals. HHS has restored biological sex as law, reinstated parental rights, defunded ideological programs, and anchored its reforms in a peer-reviewed report exposing the medical and scientific bankruptcy of pediatric sex-trait procedures.

**CMS' proposed rules package could potentially eradicate child mutilation in public and private health insurance markets.**



- ★ CMS's proposed [Medicaid & CHIP Rule](#) would disqualify cross-sex hormones, puberty blockers, and mutilation surgeries for minors from Federal Financial Participation (FFP) under CHIP and Medicaid.<sup>7</sup> States would need to rely exclusively on non-federal funds to cover these procedures.
- ★ The proposed [Conditions of Participation \(CoP\) Rule](#) would require all Medicare- and Medicaid-certified hospitals to discontinue the performance of these procedures on minors.<sup>8</sup> Under CoP, hospitals that perform these interventions would forfeit eligibility to bill CMS insurance programs for services furnished to any patient, regardless of age or diagnosis.
- ★ CMS also finalized its [Marketplace Integrity Rule](#), which terminates federal subsidies to insurance carriers that cover mutilation.<sup>9</sup>
- ★ This impacts [37 million children who are beneficiaries of Medicaid and CHIP, with federal reimbursements exceeding \\$637.3 billion annually](#).<sup>10</sup> Over 90% of hospitals are Medicaid- and Medicare-certified and rely on program payments to remain financially solvent.<sup>11</sup>

### WPATH Out, Gold Standard Science In: HHS's Report Proves that Child Mutilation is Indefensible Junk Science

- ★ HHS' efforts are informed by its [Peer-Reviewed Report](#), a comprehensive study by renowned medical experts that scientifically proves the irreversible dangers of child mutilation and the categorical lack of evidence favoring its practice.<sup>12</sup> A first-of-its-kind in the U.S., the report is a long-overdue answer to WPATH's and other left-wing organizations' attempts to couch these procedures as "[life-saving gender affirming care](#)."<sup>13</sup>
  - The report concludes that puberty blockers and cross-sex hormones—prescribed off-label to children as young as eight—disrupt healthy development, impair fertility, and induce permanent physiological changes with no-proven benefit.<sup>14</sup> It further finds that surgeries amount to sterilization and castration, inflict irreversible harm, and are performed without any credible scientific justification.<sup>15</sup>
- ★ Putting the findings into practice, Secretary Kennedy recently [declared](#) the position of the federal government that child SRPs are irreversible, life-altering, and permanently sterilizing.<sup>16</sup>
  - Following other actions taken since the inauguration, the Declaration instructs HHS operating divisions to defund programs that promote these practices, enforce Medicare and Medicaid certification rules, review state Medicaid plans for compliance, and restore biological sex as the governing construction of public health and civil rights statutes.

### Hospitals have Suspended SRPs because of HHS Efforts

- ★ Lawyers with HHS's offices of General Counsel (OGC) and Inspector General (OIG) have opened investigations into providers that perform pediatric SRPs. As a result, [major hospitals like Denver Children's](#) have suspended gender reassignment treatments on minors.<sup>17</sup>

### Holding Big Pharma Accountable

- ★ At the Food and Drug Administration (FDA), Commissioner Makary recently [issued warning letters](#) to 12 manufacturers and retailers for illegally marketing breast binders to children for gender dysphoria, citing misuse of Class I medical devices and significant regulatory violations.<sup>18</sup>

### Restoring Biology-based Rule of Law and Giving Power Back to Parents

- ★ HHS' Office of Civil Rights (OCR) [rescinded](#) Biden Administration guidance that enlarged statutory prohibitions on sex-based discrimination to include gender identity, effectively forcing providers to perform SRPs on children, regardless of parental objection.<sup>19</sup> Under its new guidance, OCR clarified that child mutilation is not a civil right; that providers are not required to perform or facilitate SRPs on children; and that parents cannot be punished for seeking alternatives to SRPs.



- ★ OCR sent a [letter](#) reminding providers that they are legally required to grant parents access to their children's medical records, especially in cases involving SRPs.<sup>20</sup>
- ★ OCR proposed a [rule](#) clarifying that Section 504 of the Americans with Disabilities Act (ADA) does not cover gender dysphoria as a disability and therefore neither compels providers to perform SRPs nor overrides parental rights in medical decisions.<sup>21</sup>

### Reversing Biden-era Funding Abuses

- ★ Secretary Kennedy has rooted out countless tax dollars laundered to child SRPs and gender ideology studies by the Biden Administration. As early as April 2025, HHS had terminated over [200 grants funding LGBTQI initiatives and experimental gender projects amounting to over \\$477 million](#).<sup>22</sup> Within just [one three-week period, the National Institutes of Health \(NIH\) terminated over \\$22 million](#) in funding to so-called SRP research, including grants studying mutilation on children.<sup>23</sup>
- ★ States and organizations are also being held to account for abuse of federal funds. For instance, the Administration for Children and Families (ACF) [terminated California's \\$17 million](#) Personal Responsibility Education Program (PREP) grant, following revelations that the State used funds to teach curricula promoting genital mutilation.<sup>24</sup> Similarly, the Health Resources and Services Administration (HRSA) [barred chemical castration in HIV/AIDS programs](#) after discovering that several states and D.C. had purchased transgender hormone therapies with funds earmarked for life-saving immunotherapies.<sup>25</sup> Additionally, the Substance Abuse and Mental Health Services Administration (SAMHSA) [terminated a contract](#) with the left-wing organization The Trevor Project for a national suicide hotline, as the organization was counseling youth on gender-affirming care rather than providing neutral suicide prevention support.<sup>26</sup>

### OTHER EFFORTS ACROSS THE ADMINISTRATION

- ★ Like CMS' rules package, the [Department of War \(DOW\)](#) and [Office of Personnel Management \(OPM\)](#) barred coverage of chemical and surgical mutilation for minors under military and federal employee health plans.<sup>27</sup>
- ★ Under [final regulations](#), the Department of Education barred schools from promoting sex-trait modification procedures or hiding gender interventions from parents, reaffirming that Title IX does not mandate such practices.<sup>28</sup>
- ★ Attorney General Bondi directed civil enforcement divisions to investigate and prosecute pediatric SRP providers for fraud and deceptive practices under the False Claims Act (FCA), drug safety violations under the Food, Drug, and Cosmetic Act (FDCA), and violations of federal anti-mutilation laws.<sup>29</sup> Bondi has likewise [serviced subpoenas](#) on providers of child SRPs.<sup>30</sup> Similarly, the Federal Trade Commission (FTC) is [probing](#) whether providers of child sex-trait procedures have engaged in deceptive advertising and failed to disclose material risks.<sup>31</sup>

<sup>1</sup>See Pew Research Center, *Americans Have Grown More Supportive of Restrictions for Transgender People in Recent Years* (Feb. 26, 2025).

<sup>2</sup>[Initial Rescissions of Harmful Executive Orders and Actions](#), 90 Fed. Reg. 8,237 (Jan. 28, 2025).

<sup>3</sup>[Ending Radical and Wasteful Government DEI Programs and Preferencing](#), 90 Fed. Reg. 8,339 (Jan. 29, 2025); [Ending Illegal Discrimination and Restoring Merit-Based Opportunity](#), 90 Fed. Reg. 8,633 (Jan. 31, 2025).

<sup>4</sup>[Ending Illegal Discrimination and Restoring Merit-Based Opportunity](#), 90 Fed. Reg. 8,633 (Jan. 31, 2025); [Ending Radical Indoctrination in K-12 Schooling](#), 90 Fed. Reg. 8,853 (Feb. 3, 2025); [Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government](#), 90 Fed. Reg. 8,615 (Jan. 30, 2025).

<sup>5</sup>90 Fed. Reg. 8,771 (Jan. 28, 2025).

<sup>6</sup>U.S. Dep't of Health & Hum. Servs., *HHS Acts to Bar Hospitals*, supra note 1.

<sup>7</sup>[Prohibition on Federal Medicaid Funding](#), 90 Fed. Reg. at 59,441.

<sup>8</sup>[Hospital Condition of Participation Rule](#), 90 Fed. Reg. at 59,463.

<sup>9</sup>Dep't of Health & Hum. Servs., *Patient Protection and Affordable Care Act; Marketplace Integrity and Affordability*, 90 Fed. Reg. 44,799 (June 25, 2025) (codified at 45 C.F.R. pts. 147, 155 & 156).



<sup>10</sup> U.S. Medicaid & CHIP Payment & Access Comm'n (MACPAC), *MACStats: Medicaid and CHIP Data Book* tbls.1 & 2 (Dec. 2024) (data current through 2024).

<sup>11</sup> Am. Hosp. Ass'n, *Fact Sheet: Majority of Hospital Payments Dependent on Medicare or Medicaid* (May 6, 2024).

<sup>12</sup> U.S. Dep't of Health & Hum. Servs., [Treatment for Pediatric Gender Dysphoria: Review of Evidence and Best Practices](#), 12–16 (Nov. 2025) (listing risks including infertility/sterility, sexual dysfunction, impaired bone density accrual, adverse cognitive impacts, and cardiovascular and metabolic disorders).

<sup>13</sup> See Am. Med. Ass'n, [AMA to states: Stop interfering in health care of transgender children](#) (Apr. 26, 2021), see also World Prof. Ass'n for Transgender Health, [Standards of Care for the Health of Transgender and Gender Diverse People](#), Version 8, S7, S11–S12, S59–S61, S256 (2022) (“WPATH defines transgender and gender-diverse people as those whose gender identity or expression differs from sex assigned at birth and treats such divergence as non-pathological”); Mount Sinai Center for Transgender Medicine and Surgery, [Gender Affirming Surgeries & Care, Mount Sinai Health System](#) (visited Dec. 28, 2025) (adopting WPATH SOC 8 as clinical practice guidelines); Am. Coll. of Physicians, [Attacks on gender-affirming and transgender health care](#) (Aug. 29, 2025); Am. Acad. of Pediatrics, [AAP reaffirms gender-affirming care policy, authorizes systematic review of evidence to guide update](#) (Aug. 4, 2023).

<sup>14</sup> *HHS Gender Dysphoria Report*, supra note 12.

<sup>15</sup> *Id.*

<sup>16</sup> U.S. Dep't of Health & Hum. Servs., *Declaration on Pediatric Sex-Rejecting Procedures* (Dec. 11, 2025).

<sup>17</sup> John Ingold, *Children's Hospital Colorado Has Suspended Gender-Affirming Care for Transgender Youth Amid a New Federal Investigation*, *The Colorado Sun* (Jan. 2, 2026).

<sup>18</sup> *HHS Press Release*, supra note 1 (“FDA is issuing warning letters to 12 manufacturers and retailers for illegal marketing of breast binders to children for the purposes of treating gender dysphoria”).

<sup>19</sup> U.S. Dep't of Health & Hum. Servs., *Notice of Rescission of “HHS Notice and Guidance on Gender Affirming Care, Civil Rights, and Patient Privacy”* (Feb. 20, 2025).

<sup>20</sup> U.S. Dep't of Health & Hum. Servs., Off. for C.R., *The HIPAA Privacy Rule and Parental Access to Minor Children's Medical Records* (Dec. 3, 2025).

<sup>21</sup> *Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance*, 90 Fed. Reg. 88,723 (Dec. 19, 2025) (to be codified at 45 C.F.R. pts. 84 & 92).

<sup>22</sup> The White House, *Fact Sheet: Report to the President on Protecting Children from Surgical and Chemical Mutilation Executive Summary* (Apr. 28, 2025).

<sup>23</sup> Miller, A.S., Liu, M., Graham, R., Berlin, N.L., Carruthers, K.H. & Keuroghlian, A.S., *Termination of Gender-Affirming Care Grants at the National Institutes of Health*, *JAMA Pediatr.* (Nov. 17, 2025).

<sup>24</sup> Admin. for Child. & Fams., U.S. Dep't of Health & Hum. Servs., *HHS Defunds California's Attempt to Indoctrinate Children with Gender Ideology* (Aug. 21, 2025); see also [Letter from Andrew Gradison](#), Acting Assistant Sec'y, Admin. for Child. & Fams., U.S. Dep't of Health & Hum. Servs., to Sydney Armendariz & Matthew Green, Cal. Dep't of Pub. Health (Aug. 21, 2025).

<sup>25</sup> Mary Margaret Olohan, *HHS Reverses Biden Policy, Ensures HIV Funds Cannot Be Diverted for Trans Procedures*, *Daily Wire* (Oct. 3, 2025).

<sup>26</sup> Trevor News, *Trump Administration Orders Termination of National LGBTQ+ Youth Suicide Lifeline, Effective July 17th*, *The Trevor Project* (June 18, 2025).

<sup>27</sup> *TRICARE; Notice of TRICARE Plan Program Changes for Calendar Year (CY) 2026*, 90 Fed. Reg. 48,728 (Oct. 28, 2025) (notice of TRICARE plan program changes for calendar year 2026); U.S. Off. of Pers. Mgmt., FEHB Program Carrier Letter No. 2025-01b, *Chemical and Surgical Sex-Trait Modification Services for Plan Year 2026 Proposals* (Aug. 15, 2025).

<sup>28</sup> *William D. Ford Federal Direct Loan (Direct Loan) Program*, 90 Fed. Reg. 48,966 (Oct. 31, 2025) (to be codified at 34 C.F.R. pt. 685).

<sup>29</sup> Mem. from the Att'y Gen. to Select Component Heads, *Preventing the Mutilation of American Children* (Apr. 22, 2025); see also [Mem. from Brett A. Shumate](#), Assistant Att'y Gen., U.S. Dep't of Just., to All Civil Div. Emps., *Civil Division Enforcement Priorities* (June 11, 2025).

<sup>30</sup> U.S. Dep't of Just., *Department of Justice Subpoenas Doctors and Clinics Involved in Performing Transgender Medical Procedures on Children* (July 9, 2025).

<sup>31</sup> Fed. Trade Comm'n, *Request for Public Comment Regarding “Gender-Affirming Care” for Minors* (June 18, 2025).

