

Secretary Kathleen Sebelius
US Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, DC 20201

April 30, 2012

Dear Madame Secretary:

The undersigned members of the Federal Sex Education Coalition, a national coalition comprised of sexual and reproductive health, public health, women's health, LGBT health and rights, HIV/AIDS prevention and treatment, youth empowerment and faith-based organizations working to advance the health and welfare of our nation's youth, are deeply troubled by the recent addition of *Heritage Keepers Abstinence Education* to the Department of Health and Human Services' list of evidence-based programs.

Heritage Keepers is an abstinence-only-until-marriage program with questionable evidence of effectiveness and problematic content. The program ostracizes lesbian, gay, bisexual, and transgender (LGBT) youth; promotes heterosexual marriage as the only acceptable family structure; withholds life-saving information from sexually active youth; and uses fear-based messages to shame youth who have been sexually active and youth living in "nontraditional" households. **We ask that you immediately remove this detrimental program from the HHS-endorsed list of evidence-based programs currently posted on the Office of Adolescent Health's (OAH) website.**

Limited Evidence of Effectiveness. The evidence supporting the *Heritage Keepers Abstinence Education* program has long been called into question. In fact, in a congressionally mandated study of federally funded Title V abstinence-only-until-marriage programs, Mathematica Policy Research, Inc., consistently found this program to be ineffective. For example, after the first year of implementation, Mathematica's interim report concluded:

Despite increases in the perceived helpfulness of program services and in the proportion of youth pledging to abstain, the Life Skills Education Component did not have significant impacts on 11 of the 12 intermediate outcomes related to sexual abstinence (Table 6). The one exception is a significant impact among middle school youth on their friends' support for abstinence.ⁱ

The lack of effectiveness was also noted in Mathematica's final report, written in 2007:

Findings indicate that the [Heritage Keepers Abstinence Program's] Life Skills Education Component had little or no impact on sexual abstinence or activity. Youth in the Life Skills AE group and control AE [Abstinence Education] group reported similar rates of sexual abstinence, number of sexual partners, and age at first sex.ⁱⁱ

We ask that you supply us with all manuscripts and supporting documentation used by HHS and/or Mathematica Policy Research, Inc. to assess the rigor of the evaluation study and the program's effectiveness.

Problematic Program Content. As concerning as is the limited evidence of effectiveness is the egregious content of *Heritage Keepers Abstinence Education*. The program contains little or no information about puberty, anatomy, sexually transmitted diseases, contraception or sexual behavior. Instead, most of its lessons are devoted to promoting the importance of heterosexual marriage and the value of abstinence before marriage. Students are asked to take virginity pledges and class time is devoted to having students plan their wedding days. *Heritage Keepers* also teaches students that:

- "Sex is like fire. Inside the appropriate boundary of marriage, sex is a great thing! Outside of marriage, sex can be dangerous!" (*Heritage Keepers*, Student Manual, p. 22)
- "Males and females are aroused at different levels of intimacy. Males are more sight orientated whereas females are more touch orientated...girls need to be careful with what they wear, because males are

looking! The girl might be thinking fashion, while the boy is thinking sex ...girls have a responsibility to wear modest clothing that doesn't invite lustful thoughts." (*Heritage Keepers*, Student Manual, p. 46)

- Men are strong, respectful, and courageous. And, "a man protects." (*Heritage Keepers*, Student Manual, p. 52) In contrast, a "real woman" knows herself, is confident, sends a clear message, and is caring. (*Heritage Keepers*, Student Manual, p. 55)
- "People who live together before marriage experience 'significantly more difficulty in their marriage with adultery, alcohol, drugs and independence [not wanting to depend on each other for anything] than those who do not live together.'" (*Heritage Keepers*, Student Manual, p. 26)
- "One reason may be that when people bond closely through sexual activity, then break up and bond with someone else, and then someone else, it may become increasingly difficult to maintain a lasting bond." (*Heritage Keepers*, Teacher Manual, p. 56)
- Sexual activity outside of marriage can lead to: "Sexually Transmitted Viruses, Sexually Transmitted Bacteria, Cervical Cancer, AIDS, Legal and financial responsibility for a child until he or she is at least 18, Raising a child alone, Emotional hurt and regret, Increased chance of abuse from a partner." (*Heritage Keepers*, Student Manual, p. 35)
- "Of all sexually active people, married people with only one life-time partner are most likely to report they are 'extremely' or 'very' satisfied with the amount of physical and emotional pleasure they experience in their sex lives." (*Heritage Keepers*, Student Manual, p. 25)

When planning their weddings during class:

- Young men are asked to envision their wedding day: "The doors swing open and there stands your bride in her white dress...This is the woman you have waited for (remained abstinent for) who has waited for you...This woman loves you and trusts you with all that she is and all that she has. You want to be strong, respectful and courageous for her. With all your heart, you want to protect her, and by waiting (sexually) you have." (*Heritage Keepers*, Student Manual, p. 59)
- Young women are asked to envision their wedding day: "Everything is just as you have seen it in a million daydreams..." When the bride takes her father's arm: "Your true love stands at the front. This is the man who you have waited for (remained abstinent for)...This man wants to be strong and courageous for you, to cherish and protect you...You are ready to trust him with all that you have and all that you are, because you have waited (sexually) you have it all to give." (*Heritage Keepers*, Student Manual, p. 49)

LGBT youth are ignored throughout the program, thus reinforcing the cultural invisibility and bias these students already face in many schools and communities. The curriculum's focus on marriage as the only appropriate context for sexual behavior further ostracizes LGBT youth and the children of LGBT parents who still cannot legally marry in most states and at the federal level.

Poor Public Health Policy. As described on the OAH website, *Heritage Keepers Abstinence Education* targets middle and high school students. Yet, it fails to speak to the reality of their lives. Today, roughly 40 percent of high school students have had sexⁱⁱⁱ and young people under age 29 continue to account for approximately 30 percent of all new cases of HIV infection.^{iv} Further, while the teen birth rate has declined significantly in the past few decades, the U.S. continues to have one of the highest teen birth rates in the industrialized world.^v Young people need accurate and complete sexual health information to help them protect their health and lives.

It is in recognition of this fact that leading medical and public health groups have actively opposed abstinence-only-until-marriage programs. For example, the Institute of Medicine of the National Academies has called for termination of federal funding for abstinence-only-until marriage programs and refers to them as "poor fiscal and public health policy."^{vi} The American Public Health Association has stated, "While good patient care is built upon the notions of informed consent and free choice, [abstinence-only] programs are inherently coercive by withholding information needed to make informed choices."^{vii} And the Society for Adolescent Health and

Medicine issued a statement calling for the end of these programs: "Although abstinence from sexual intercourse represents a healthy behavioral choice for adolescents, policies or programs offering "abstinence only" or "abstinence until marriage" as a single option for adolescents are scientifically and ethically flawed." ^{viii}

The Obama Administration's endorsement of this program runs in direct contradiction to its commitment to the health and well-being of young people. The Director of the Centers for Disease Control and Prevention (CDC) has called teen pregnancy prevention and HIV prevention two of the country's six "winnable battles," and recent analysis of National Survey of Family Growth data trends indicates that increases in contraceptive use have fueled the reductions in teen births.^{ix} Yet, *Heritage Keepers* does not include information about the health benefits of contraception or condoms.

The National Center for HIV/AIDS, Viral Hepatitis, STD, and TB Prevention at the CDC, recognizing the disproportionate impact of the HIV epidemic on young men who have sex with men (YMSM) and that this is the only population in which HIV infections are increasing, has committed millions of federal dollars to reducing the burden of disease on this population. Concurrently the President has further demonstrated his administration's commitment to LGBT health and rights by recording his own "It Gets Better" video and announcing support for the Safe Schools Improvement Act and Student Non-Discrimination Act. Yet, at best, the *Heritage Keepers Abstinence Education* program ostracizes LGBT youth—further fueling their sense of invisibility—and, at worst, promotes homophobia, in direct contradiction to the administration's effort to improve LGBT health and well-being and reduce the burden of HIV among YMSM.

Clearly, it is both hypocritical and misguided for the administration to include *Heritage Keepers Abstinence Education* on the list of HHS-endorsed programs. We ask you to immediately remove this program from the list and in the future to take into account a program's content and intent, as well as evidence of its effectiveness, before recommending its use. The health and well-being of the nation's youth depend on your good judgment.

Sincerely,

Advocates for Youth
AIDS United
American Civil Liberties Union
Catholics for Choice
Human Rights Campaign
International Women's Health Coalition
National Asian Pacific American Women's Forum
National Council of Jewish Women
National Coalition of STD Directors
National Latina Institute for Reproductive Health
Religious Coalition for Reproductive Choice
Sexuality Information and Education Council of the U.S. (SIECUS)
The AIDS Institute

CC: Howard Koh, Assistant Secretary, HHS
Evelyn Kappeler, Interim Director, Office of Adolescent Health
Valerie Jarrett, Senior Advisor to President Barack Obama; Chair of the White House Council on Women and Girls
Cecilia Munoz, Director, White House Domestic Policy Council
Tina Tchen, Director of the White House Office of Public Engagement

Jenny Yeager Kaplan, Special Assistant to the Director, White House Office of Public Engagement
Gautam Raghavan, Associate Director of Public Engagement, White House Office of Public Engagement
Hallie Schneir, Associate Director, White House Office of Public Engagement
Ronnie Cho, Associate Director, White House Office of Public Engagement
Grant Colfax, Director, White House Office of National AIDS Policy
Brian Samuels, Commissioner, Administration on Children and Families
Anton Gunn, Director of External Affairs, HHS
Robert Gordon, Associate Director for Education, Income Maintenance and Labor, OMB
Laurel Havas, Program Examiner, OMB

ⁱ Clark M and Devaney B. *First Year Impacts of the Heritage Keepers®: Life Skills Education Component*. Mathematica Policy Research, Inc. Accessed on 4/30/2012 from <http://aspe.hhs.gov/hsp/05/abstinence2/index.htm>.

ⁱⁱ Clark M et al. *Impacts of the Heritage Keepers® Life Skills Education Component Final Report*. Mathematica Policy Research, Inc. Accessed on 4/30/2012 from <http://aspe.hhs.gov/hsp/abstinence07/hk/>

ⁱⁱⁱ Centers for Disease Control and Prevention. Youth risk behavior surveillance system, United States 2009. *Morbidity and Mortality Weekly Report* 2010; 57(SS-5): 1-148.

^{iv} Prejean J, Song R, Hernandez A, Ziebell R, Green T, et al. (2011) *Estimated HIV Incidence in the United States, 2006-2009*. PLoS ONE 6(8): e17502.doi:10.1371/journal.pone.0017502

^v UNICEF, 'A league table of teenage births in rich nations', Innocenti Report Card No.3, July 2001. UNICEF Innocenti Research Centre, Florence.

^{vi} Monica Ruiz, et al., *No Time to Lose: Getting More from HIV Prevention* (Washington, D.C: Institute of Medicine, 2000), 6.

^{vii} "Abstinence and U.S. Abstinence-Only Education Policies: Ethical and Human Rights Concerns," Policy Statement, American Public Health Association, 8 November 2006, accessed 30 March 2010, <<http://www.apha.org/advocacy/policy/policysearch/default.htm?id=1334>>.

^{viii} Santelli, John, M.D.,M.P.H. Abstinence-only Education Policies and Programs: A Position Paper of the Society for Adolescent Medicine. *Journal of Adolescent Health*, 38 (2006).

^{ix} *Unpublished Tabulations of the 2006–2010 National Survey of Family Growth*. Guttmacher Institute, 2012. Accessed 4/30/2012 from <http://www.guttmacher.org/media/resources/Guttmacher-NSFG-Analysis.pdf>