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## United States Senate

COMMITTEE ON HEALTH, EDUCATION,  
LABOR, AND PENSIONS

WASHINGTON, DC 20510-6300

July 22, 2025

### **VIA ELECTRONIC TRANSMISSION**

Kim Keck  
President and CEO  
Blue Cross Blue Shield Association  
750 9th St. NW  
Washington, DC 20001

Dear Ms. Keck:

Americans do not want federal tax dollars funding irreversible gender transition procedures on children. In his first month in office, President Trump made clear that protecting children from chemical and surgical castration must be a priority. As chair of the Senate Committee on Health, Education, Labor, and Pensions (HELP), I am working hand in glove with his administration to achieve this goal.

On January 28, 2025, the President issued Executive Order (EO) 14187 titled, “Protecting Children from Chemical and Surgical Mutilation,” establishing that the United States will not support gender transition procedures on individuals under age 19, which includes the use of puberty blockers, cross sex hormones, or surgery.<sup>1</sup>

The EO condemned guidance issued by the World Professional Association for Transgender Health (WPATH) as “junk science” and directed federal agencies to enforce all laws that prohibit or limit these destructive and life-altering procedures.<sup>2</sup> The EO also directed the Department of Health and Human Services (HHS) and its agencies to end gender transition services for children covered by Medicare, Medicaid, and the exchanges established by the Patient Protection and Affordable Care Act (ACA).<sup>3</sup>

In January, the Office of Personnel Management (OPM) issued a call letter for Plan Year 2026 to insurers seeking to offer plans for coverage under the Federal Employee Health Benefits (FEHB)

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<sup>1</sup> Exec. Order No. 14187, 90 Fed. Reg. 8771 (Feb. 3, 2025).

<sup>2</sup> *Id.*

<sup>3</sup> *Id.*

and Postal Service Health Benefits (PSHB) programs.<sup>4</sup> OPM specifically instructed insurers to: (1) not make available more than two options for an individual's sex; and (2) "exclude coverage for pediatric transgender surgeries or hormone treatments for the purpose of gender transition."<sup>5</sup>

HHS subsequently released a comprehensive review in May of the evidence and best practices for promoting the health of children and adolescents with gender dysphoria, which identified "serious concerns about medical interventions, such as puberty blockers, cross-sex hormones, and surgeries, that attempt to transition children and adolescents away from their sex."<sup>6</sup> HHS concluded that a growing body of evidence points to significant risks (e.g., infertility) while finding very weak evidence of benefit, consistent with systematic reviews of evidence around the world. Following issuance of the review, the Centers for Medicare and Medicaid Services (CMS) finalized a rule in June to prohibit health insurance issuers subject to Essential Health Benefit (EHB) requirements from providing coverage for "sex trait modification procedures" as an EHB beginning in Plan Year 2026.<sup>7</sup>

Private payers play a critical role in our health care system, and I applaud President Trump's strong leadership in telling all industry stakeholders that these dangerous practices must end. Major health insurers, including your members, presently cover a range of gender transition services and surgeries as medically necessary procedures under certain plans. These insurers are obligated to comply with the President's EO, agency guidance, regulations, and enforcement actions barring federal payment for gender transition procedures for minors.

As a doctor, I am extremely concerned that medical organizations continue to promote irreversible gender transition procedures for children against scientific data. It is critical that medical standards of care for the treatment of children reflect the best scientific evidence available at present, consistent with current regulatory requirements. Health insurers likewise must align with the latest evidence and related agency guidance, rules, and enforcement actions, and your association has a critical role to play.

Therefore, please provide a detailed response to the Committee no later than August 7, 2025, to the following questions:

1. What actions, if any, has the association taken to ensure its members' compliance with Executive Order (EO) 14187, which prohibits the funding, sponsorship, promotion, assistance, or support of gender transition interventions for minors?
2. Please describe the types of gender transition services for which the association's members either currently provide or have provided coverage to minors at any time, including counseling; speech and communication modification services; behavioral adaptations;

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<sup>4</sup> Letter from Laurie Bodenheimer, Assoc. Director, U.S. Office of Personnel Mgmt. Healthcare and Insurance, to All FEHB and PSHB Carriers (Jan. 31, 2025), <https://www.opm.gov/healthcare-insurance/carriers/fehb/2025/2025-1a.pdf>.

<sup>5</sup> *Id.*

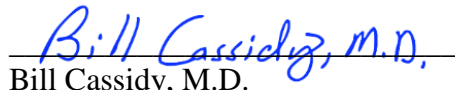
<sup>6</sup> Press Release, Dep't of Health and Human Services, HHS Releases Comprehensive Review of Medical Interventions for Children and Adolescents with Gender Dysphoria (May 1, 2025), <https://www.hhs.gov/press-room/gender-dysphoria-report-release.html>.

<sup>7</sup> Press Release, Centers for Medicare and Medicaid Services, 2025 Marketplace Integrity and Affordability Final Rule (June 20, 2025), <https://www.cms.gov/newsroom/fact-sheets/2025-marketplace-integrity-and-affordability-final-rule>.

puberty blockers; hormone therapy; hair removal; surgical procedures; and resident and fellow medical training.<sup>8</sup>

3. Please provide the sources and dollar amounts of any federal funding received by the association annually.
  - a. What amount of this funding is utilized for association member and/or health insurer outreach, education, or other initiatives related to gender transition services for minors?
4. Do the association's members either currently provide, or have they in the past provided, coverage of gender transition services for minors under FEHB or PSHB program plans? If so, please provide details on the coverage provisions included in these plans.
  - a. Please describe any preparatory actions taken to comply with OPM's directives for Plan Year 2026.
5. Do the association's members currently provide coverage of gender transition services for minors in EHB packages for plans offered on the ACA exchanges? If so, please provide details on the coverage provisions included in these plans.
  - a. Please describe any preparatory actions taken to comply with CMS's final rule for Plan Year 2026.
6. Following the signing of EO 14187, please describe what, if any, revisions have been made to the association's guidelines on coverage of gender transition services for minors.
  - a. What related guidance or guidelines for coverage, including revised scientific literature, has the association provided to its members and/or health care providers?
7. Please provide copies of guidance documents, guidelines for coverage, and scientific literature provided by the association from January 28, 2025, to the present to its members and/or health insurers related to gender transition services for minors.

Sincerely,

  
Bill Cassidy, M.D.  
Chairman  
U.S. Senate Committee on Health,  
Education, Labor, and Pensions

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<sup>8</sup> This information should be provided in a manner consistent with the requirements of the Health Insurance Portability and Accountability Act (HIPAA).