



July 27, 2026

VIA ELECTRONIC MAIL ONLY

Linda McMahon, Secretary
U.S. Department of Education
400 Maryland Ave, SW
Washington, DC 20202

Todd Blanche, Acting Attorney General
U.S. Department of Justice
950 Pennsylvania Ave, NW
Washington, DC 20530

Re: Potential violations of the PPRA & other federal laws

Secretary McMahon and Acting Attorney General Blanche,

Defending Education (“DE”) writes to notify your offices of a recently reported statewide program in Minnesota—the “MyGender Dolls” program—that appears to violate federal law. DE is a national grassroots membership organization working to reclaim our schools from activists promoting harmful agendas. DE brings this complaint as an interested third-party organization with members who are parents of students throughout the country, including in Minnesota. DE and its members oppose, among other things, state interference with families’ privacy rights and parents’ rights to direct their children’s upbringing. Nowhere is this interference more prevalent than in the context of classroom instruction on “gender identity” and so-called “gender-affirming” practices in K-12 schools.

According to recent news reports, Minnesota schoolchildren may soon be provided with “[t]ransgender dolls” through the MyGender Dolls program, which was created at the University of Minnesota using taxpayer funds.¹ As explained in more detail below, the MyGender Dolls program

¹ Robert McGreevy, *Transgender dolls to be available for Minnesota schoolchildren as young as 4 under Walz-backed program: report*, FOX News (July 25, 2026), perma.cc/4JH4-R49T; see also Gabrielle Fahmy, *Taxpayer-funded trans dolls with removable genitalia to hit classrooms this fall for kids as young as 4 to ‘learn about different options’*, New York Post (July 25, 2026), perma.cc/J3CR-UA8K.

potentially violates both the Protection of Pupil Rights Amendment (“PPRA”) and the U.S. Constitution and runs afoul of this administration’s guidance on combatting gender ideology.

I. Minnesota’s MyGenderDolls program reportedly uses dolls with removable genitalia to push gender ideology on children as young as four years old.

Per recent reporting, the MyGender Dolls program was developed “in the University of Minnesota Medical School’s Department of Family Medicine and Community Health.”² The program was “developed in part through the [University’s] Early Innovation Fund,” which is described as a “taxpayer-funded development program supported by Gov. Tim Walz.”³ Employees at the University of Minnesota reportedly “spent over half a decade” on the “controversial project.”⁴ Now, some of those employees have “spun” the MyGender Dolls program “into a commercial venture” that promises to provide its dolls for Minnesota schoolchildren.⁵

The dolls created by the MyGender Dolls program are, according to the program’s own website, a “first-of-their-kind therapeutic” tool that promises to “make gender fun!”⁶ As described in news reports, the dolls bear “gender-neutral names like ‘Sam,’ ‘Rory,’ ‘Avery,’ and ‘Parker,’ have removable internal and external genitals,” and feature “more than 100 interchangeable pieces of clothing, accessories and hairstyles—like a trans Mr./Mrs. Potato Head.”⁷ According to a MyGender Dolls “co-founder,” the dolls are designed to teach children “that there’s diversity in gender identity and that what makes you real is not what your body parts are, but how you think and feel.”⁸ Children are encouraged to question ““not just what our bodies are able to do now but what we want our bodies to do and look like in the future,””

² McGreevy, *supra* n.1.

³ *Id.*

⁴ Fahmy, *supra* n.1.

⁵ *Id.*

⁶ *MyGender Dolls* (visited July 27, 2026), mygenderdolls.com (archived at bit.ly/4vO5WxV).

⁷ Fahmy, *supra* n.1.

⁸ *Id.*

according to one University of Minnesota professor.⁹ To accomplish this goal, “therapists” reportedly “us[e] the dolls to get the kids talking about their private parts.”¹⁰

The dolls will reportedly be “accessible to Minnesota school children ... starting this fall.”¹¹ The MyGender Doll website states that its dolls are designed for use with “children ages 4–10.”¹² According to the website, the dolls will be available to school counselors, educators, mental health providers, pediatricians, and others “who support trans and gender diverse children in clinical and educational settings.”¹³

Although MyGender Dolls are reportedly the result of “state-funded efforts” and intended for use Minnesota schools,¹⁴ there is no indication in news reports or on the MyGender Dolls website that Minnesota parents have been informed about MyGender Dolls’ forthcoming launch. Nor is DE aware of any such communications being sent to any Minnesota parents. Additionally, according to reports, “[i]t is not known if parents” whose children attend schools that use the dolls “will be able to opt out of” the program “for their kids.”¹⁵

Notably, this would not be the first time Minnesota authorities have pushed controversial gender ideology on schoolchildren and potentially run afoul of the law in doing so. In fact, earlier this year, the Department of Justice filed a lawsuit against the Minnesota Department of Education and the Minnesota State High School League for “requiring girls to compete against boys in athletic competitions that are

⁹ *Id.*

¹⁰ *Id.*

¹¹ McGreevy, *supra* n.1; *MyGender Dolls*, *supra* n.6 (stating that the dolls will be “[l]aunching 2026” and available to “clinicians and educators”).

¹² *MyGender Dolls*, *supra* n.6.

¹³ *Id.*

¹⁴ McGreevy, *supra* n.1.

¹⁵ Fahmy, *supra* n.1.

designated exclusively for girls and allowing boys to invade intimate spaces designated exclusively for girls, such as multi-person locker rooms and bathrooms.”¹⁶

II. The MyGenderDolls program potentially violates federal law.

If recent news reports on the project are true, Minnesota’s use of MyGender Dolls in the state’s public schools may run afoul of federal law in multiple ways.

1. PPRA. Under the Protection of Pupil Rights Amendment, federally funded educational institutions are prohibited from requiring students “to submit to a survey, analysis, or evaluation” that elicits “information concerning” the student’s “sex behavior or attitudes” or any “mental or psychological problems” the student might have.¹⁷ Schools are also required to work with parents “to protect student privacy” in the event any such activity is undertaken, and schools must respect a parent’s “right” to “inspect” any information elicited from such an activity.¹⁸ Additionally, schools must notify parents before any such activity is undertaken and must inform parents of their right to opt their children out of the activity.¹⁹

Thus, to the extent Minnesota authorities use MyGender Dolls to evaluate students’ perceptions of “what [their] body parts are” and “how [they] think and feel about” their gender, without informing parents or allowing parents to “opt out of” the activity, the program arguably violates the PPRA.²⁰

2. The 1st and 14th Amendments. As the Supreme Court has repeatedly confirmed, the First and Fourteenth Amendments to the U.S. Constitution protect “parents’ rights to direct the upbringing and

¹⁶ *Justice Department Sues Minnesota to Protect Girls’ Sports and Intimate Spaces*, U.S. Dep’t of Justice (Mar. 30, 2026), perma.cc/3VG7-BSSV.

¹⁷ 20 U.S.C. §1232h(b).

¹⁸ *Id.* §1232h(c)(1)–(2).

¹⁹ *Id.* §1231h(c)(2)(A)(ii), (c)(2)(C).

²⁰ Fahmy, *supra* n.1.

education of their children,” especially on matters implicating sex, mental health, and religion.²¹ And those rights “follow ... children into the public school classroom.”²²

When schools use materials that “present as a settled matter a hotly contested view of sex and gender that sharply conflicts with the” views “that the parents wish to instill in their children,” they burden those constitutionally protected parental rights.²³ The danger is especially great when controversial materials are “presented to young children by authority figures in elementary school classrooms,” and especially when schools “withhold notice to parents [or] forbid opt outs.”²⁴

3. Executive Orders. The MyGender Dolls program likewise appears to run afoul of this administration’s guidance on combatting gender ideology and protecting parental rights. Indeed, President Trump has issued at least three executive orders targeting so-called gender-affirming practices in federally funded institutions.²⁵ Those orders call for an end to “indoctrination in K-12 schools ... based on gender ideology” and instead urge authorities to “protec[t] parental rights, pursuant to ... the PPRA.”²⁶ And they clarify that “[f]ederal funds shall not be used to promote gender ideology.”²⁷ But the MyGender Dolls program, which per its own description is “grounded in gender-affirming” practices, appears to flout those instructions.²⁸

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²¹ *Mirabelli v. Bonta*, 67 U.S. 492, 497 (2026); *see also Mahmoud v. Taylor*, 606 U.S. 522 (2025).

²² *Mahmoud*, 606 U.S. at 547.

²³ *Id.* at 552–53.

²⁴ *Id.* at 550, 554.

²⁵ Exec. Order 14168, *Defending Women from Gender Ideology Extremism and Restoring Truth to the Biological Government*, (Jan. 20, 2025), perma.cc/D3M6-RLDJ; Exec. Order 14187, *Protecting Children from Chemical and Surgical Mutilation* (Jan. 28, 2025), perma.cc/RH35-72GN; Exec. Order 14190, *Ending Radical Indoctrination in K-12 Schooling* (Jan. 29, 2025), perma.cc/3XB6-6CYH.

²⁶ Exec. Order 14190 §3(a)(i)–(ii).

²⁷ Exec. Order 14168 §3(g); *see also* Exec. Order 14190 §3(a)(i), (b)(ii) (instructing federal department heads to devise “a plan for ... eliminating Federal funding or support for” gender ideology).

²⁸ *MyGender Dolls*, *supra* n.6.

PPRA empowers federal authorities to “take such action as the Secretary determines appropriate to enforce” the law.²⁹ Accordingly, DE urges your departments to investigate Minnesota’s MyGender Dolls program and take appropriate corrective action.

Sincerely,

Nicole Neily
President
Defending Education

²⁹ 20 U.S.C. §1232h(e).