

CONCERNED WOMEN *for* AMERICA

August 20, 2025

Dr. Steven L. Lieberman
Acting Under Secretary for Health
Department of Veterans Affairs
810 Vermont Avenue NW
Washington, DC 20420

Re: 38 CFR Part 17, RIN 2900-AS31

Concerned Women for America (CWA) is the largest public policy organization for women, championing Biblical values and constitutional principles in all levels of public policy. CWA is led by Penny Young Nance, proud mother of a Second Lieutenant in the United States Army. Our organization serves as a voice for countless veterans and military families among our 500,000 grassroots members. Teresa Pregnall, our Virginia state director and a member of our Board of Directors, is a veteran herself. CWA is explicitly pro-military and pro-life; we affirm national sovereignty, and we believe that pro-life is pro-woman in every circumstance.

CWA strongly supports the Department of Veterans Affairs' (VA) proposed rule to reinstate the lawful exclusion of abortions and abortion counseling from the Civilian Health and Medical Program of the Department of Veterans Affairs (CHAMPVA) and VA medical benefits packages.

In September of 2022, President Biden issued an Interim Final Rule (IFR) ordering the VA to include abortion and abortion counseling services among CHAMPVA and VA healthcare benefits. The IFR is a plain violation of longstanding federal law, and CWA firmly believes that the Biden-era order defies the will of hard-working American taxpayers while harming veterans and their families.

CHAMPVA and VA healthcare benefits are federally funded programs; as such, they must operate in accordance with the rule of law and the will of the American people. The *Veterans Health Care Act of 1992 (VHCA)* stipulates that American taxpayer dollars

may not fund abortions in any federal medical benefits program for veterans and their dependents. The VHCA was passed in 1992 to mirror the legacy of the 1976 Hyde Amendment, an annual rider in the Health and Human Services appropriations text that bars taxpayer dollars from being spent on abortions through Medicaid.

After almost fifty years as law, the Hyde Amendment has saved an estimated 2.56 million children from abortion and prevented coerced taxpayer funding of abortions.¹ Americans support the Hyde family of amendments, including the VHCA: sixty percent oppose or strongly oppose taxpayer funding of abortions.² Most American taxpayers find the use of their money towards abortions morally objectionable. The illegal, coerced taxpayer funding of abortion in VA hospitals initiated under the Biden Administration is a grave violation of the American conscience and an abuse of hard-earned taxpayer dollars.

CWA also rejects former President Biden's claim that women "need" abortions. Abortion is an affront to womanhood. Pro-life is pro-woman, and as long as the VA provides abortions, it cannot offer quality care to female service members and veteran families. Pregnancy is a unique female capability worthy of unique support in our military—not violent termination. As a leading pro-life organization, CWA knows that abortion harms women.

Studies have shown that women who undergo abortions are 81% more likely to experience adverse mental health conditions, including depression, anxiety, suicidal behavior, substance abuse, insomnia, nightmares, isolation/loneliness, and regret. According to the *European Journal of Obstetrics & Gynecology and Reproductive Biology*, 60% of women report emotional distress after an abortion, and 30% of those experience "severe" distress. *The Obstetrical and Gynecological Survey* classifies abortion as a risk factor for self-harm and mood disorders.

Some of the medical and physical risks of abortion include cervical damage, uterine scarring, future premature birth(s), future miscarriage(s), future ectopic pregnancies, heavy bleeding, sepsis, placenta previa, perforation of the uterus, and, in some cases, death.³ One abortion increases a woman's risk of breast cancer by 44%.⁴

¹ New, Michael J. (2023). "Hyde @ 40: Analyzing the Impact of the Hyde Amendment with July 2020 and 2023 Addenda." *Charlotte Lozier Institute*. [Hyde @ 40: Analyzing the Impact of the Hyde Amendment with July 2020 and June 2023 Addenda - Lozier Institute](#)

² McCormack, John. (2023). "New Poll on Abortion: Most Americans Opposed Taxpayer Funding." *National Review*. [New Poll on Abortion: Most Americans Oppose Taxpayer Funding | National Review](#)

³ "Abortion Risks." *Students for Life of America*. [Abortion Risks - Students for Life of America](#)

⁴ Huang, Y., Zhang, X., Li, W. *et al.* A meta-analysis of the association between induced abortion and breast cancer risk among Chinese females. *Cancer Causes Control* **25**, 227–236 (2014). <https://doi.org/10.1007/s10552-013-0325-7>

Beyond harming women, abortion is never medically necessary—there is no medical condition that requires an induced abortion to save a woman’s life. There are legitimate, ethical, medical solutions to every life-threatening prenatal condition, such as pre-eclampsia, hemorrhage, infection, and cardiovascular collapse. In the first trimester of pregnancy, maternal-fetal separation⁵ allows an unborn child (embryo or fetus) a dignified, painless death in a life-or-death scenario where a pregnancy must be ended to save a woman’s life. First-trimester maternal-fetal separation may result in the death of the premature child, but the separation is not an abortion. In the second trimester, early delivery is the ethical alternative to a painful dismemberment abortion and, paired with NICU treatment, allows the baby a chance to live while saving her mother’s life. In the third trimester, early delivery via induced labor or C-section is always safer, faster, and less expensive than a three-day late-term abortion (which includes induced cardiac arrest in the child, cervical dilation, and stillbirth).⁶

Female servicemembers, veterans, and veteran family members deserve comprehensive, life-affirming, and life-saving pregnancy care in VA hospitals, and their unborn sons and daughters deserve the dignity befitting the children of servicemembers. Abortions are always cruel—never lifesaving, necessary, or beneficial. Life-affirming care, as described, delivers quality care while preserving human life and dignity for mothers and their unborn children.

To be clear, life-affirming prenatal and postnatal treatment for veterans and CHAMPVA beneficiaries includes ectopic pregnancy care and miscarriage management. These treatments are explicitly not abortions⁷ and should be provided to women in need of these procedures at VA hospitals.

Abortion does not just harm women; it also ends the life of a human being. Ninety-six percent of biologists agree that human life begins at conception—the life of a military child, then, begins with fertilization. At VA hospitals, that means an abortion ends the life of a military child. VA doctors have an obligation to two patients in every pregnancy: the maternal patient and the fetal patient.

Every unborn child possesses a unique genetic code and capacity for human development from conception, and his or her personhood is not limited by size, location, stage of development, or level of dependency. All human life bears the dignity due to

⁵ “Premature Delivery is Not Induced Abortion.” *American Association of Pro-life Obstetricians and Gynecologists*. (2013). [Premature Delivery is Not Induced Abortion | AAPLOG - American Association of Pro-life Obstetricians & Gynecologists](#)

⁶ “Concluding Pregnancy Ethically.” *American Association of Pro-life Obstetricians and Gynecologists*. (2022). [PG-10-Concluding-Pregnancy-Ethically-updated.pdf](#)

⁷ “AAPLOG Statement: Clarification of Abortion Restrictions.” *American Association of Pro-life Obstetricians and Gynecologists*. (2022). [AAPLOG Statement: Clarification of Abortion Restrictions | AAPLOG - American Association of Pro-life Obstetricians & Gynecologists](#)

humans created in the Image of God and owed a constitutional right to life—boy or girl, abled or disabled, expected or unexpected.

All in all, CWA affirms that abortion is not healthcare because pregnancy is never a disease or a disorder. Healthcare is broadly defined as “the field concerned with the maintenance or restoration of the health of the body or mind.” Abortion both intentionally ends a human life in utero and harms a woman's body and mind, and it is not “maintenance” or “restoration”; it is intentional killing.⁸ CWA is confident that the Veterans Administration exists to honor and extend the lives of United States veterans and their loved ones, not to illegally end lives via abortion on the taxpayers' dime.

CWA regrets that the Biden administration lawlessly allowed federal funds to sponsor aborting thousands of unborn military sons and daughters. This illegal, undignified, anti-woman, and un-American violation of the law must end. Abortion is not healthcare because pregnancy is not a disease, and the Department of Veterans Affairs must provide quality healthcare to women in uniform. CWA expects the VA to proceed in reinstating the full exclusion of abortions and abortion counseling from the VA and CHAMPVA medical benefits packages in accordance with the *Veterans Health Care Act of 1992*.

⁸ Skop, Ingrid. (2024). “Is Induced Abortion Healthcare?” *Charlotte Lozier Institute*. [Is Induced Abortion Health Care? - Lozier Institute](#)