

UCLA School of Law **Center on Reproductive Health, Law, and Policy**

Q&A



August 27, 2025

Submitted Electronically

Division of Dockets Management
U.S. Food and Drug Administration
Department of Health and Human Services
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Reproductive Health Researchers' Comment

The UCLA Law Center for Reproductive Health, Law, and Policy and UCSF Advancing New Standards in Reproductive Health submit this comment on behalf of the below signed 263 reproductive health researchers trained and experienced in conducting or evaluating clinical and social science studies on reproductive health issues, including studies on the safety and effectiveness of mifepristone.¹ Signatories share a commitment to evidence-based reproductive health care and FDA decision-making based on sound and transparent science. Signatories submit this comment in support of pending citizen petitions ([FDA-2025-P-0377-0001](#); [FDA-2025-P-1576-0001](#); [FDA-2025-P-2162-0001](#)) that, among other steps to ensure medication abortion remains accessible, ask the FDA to refrain from imposing additional or increased restrictions on mifepristone. Specifically, signatories submit this comment to contextualize the relevant research and to explain the flaws in recent reports on mifepristone that are not grounded in gold standard science or transparent and reliable data and analysis.

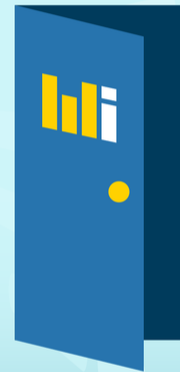
Along with our partners at [Advancing New Standards in Reproductive Health \(ANSIRH\) at UCSF](#), this week we submitted a letter on behalf of more than 260 researchers to the U.S. Food and Drug Administration (FDA). The letter affirms the 25-year safety record of mifepristone, explains why recent reports that attempt to muddy that record lack scientific rigor and reliability, and urges the FDA to continue grounding any future decisions about abortion pill access in transparent, rigorous science.

CRHLP helped organize this letter alongside ANSIRH as part of our ongoing work to ensure that law and policy are informed by rigorous science and research.

The full letter can be found [here](#). Please share the letter and our associated social media posts on [LinkedIn](#) and [Bluesky](#) with your network.

Events

OPEN HOUSE



YOU'RE INVITED!

Come meet the staff of the Williams Institute and the Center for Reproductive Health, Law & Policy!

The Williams Institute is a center at UCLA Law that conducts research on sexual orientation and gender identity law and policy.

CRHLP is a center at UCLA Law that develops long-term solutions to advance all aspects of reproductive justice and abortion access.

Join us to learn about the various academic and extracurricular opportunities we have available to law students.

**WEDNESDAY
September 3**

5:30 – 7:00PM

Presentation at 6:00pm

At the WI and CRHLP office in Westwood

Address provided upon RSVP

RSVP: bit.ly/StudentOpenHouse2025



Co-sponsored by QTPOCC, OUTLaw, and
If/When/How: Law Students for Reproductive Justice

Students: RSVP now for our Student Open House, co-hosted with the The Williams Institute at UCLA School of Law! Join us on Wednesday, September 3, 5:30–7:00 PM to meet the staff of the Williams Institute and CRHLP and enjoy light refreshments and appetizers.

At 6:00 PM, enjoy a special presentation about our work and ways you can get involved. Whether you're curious about research, policy, or advocacy, now is your opportunity to get involved! Register now and spread the word by sharing this invite with your network: <https://bit.ly/StudentOpenHouse2025>

Policy News



Photo Credit: Gannett Media

The American College of Obstetricians and Gynecologists (ACOG) has issued [updated clinical guidance](#) that vaccination against COVID-19, influenza, and RSV during pregnancy is safe and strongly recommended, [citing extensive data](#) showing benefits for both pregnant patients and their infants. The recommendations emphasize that immunization during pregnancy reduces risks of severe illness, pregnancy complications, and infant hospitalizations, while also providing passive immunity to newborns. The guidance comes after Health and Human Services Secretary Robert F. Kennedy Jr. [ended the federal recommendation](#) for COVID-19 vaccination during pregnancy, and the FDA this week [narrowed eligibility](#) for updated COVID-19 vaccines to high-risk groups, restricting access for many healthy adults and children. In their guidance, ACOG stresses that vaccination during pregnancy remains one of the most effective tools to prevent poor outcomes and urges clinicians to continue strongly recommending COVID-19, flu, and RSV vaccines during pregnancy despite shifting federal policy.

Legal News



Photo credit: AP Photo/Robert F. Bukaty, Fil

A federal judge [has denied](#) Maine Family Planning's request to temporarily restore Medicaid reimbursements while its lawsuit challenging Trump administration cuts proceeds. The provider, which operates 18 clinics serving about 8,000 low-income patients across rural Maine, argued that the immediate loss of funding would cause irreparable harm. The group [says](#) it faces losses of up to \$1.9 million, potential layoffs, and disruption of services, including primary care, contraception, cancer screenings, and STI testing.

In refusing to block the defunding, the court reasoned that "however unwise is the prohibition of Medicaid funding to providers best positioned to deliver Medicaid services to underserved rural populations," plaintiff was not likely to succeed on its claim that the law "arbitrarily and irrationally" bars them from the Medicaid funding program or that they are the target of disfavored treatment in violation of the Equal Protection Clause. The court noted that while the Supreme Court has struck down laws driven by a "bare congressional desire to harm a politically unpopular group," precedent also establishes that "Congress is entitled to withhold funds and otherwise disassociate from conduct that is not enshrined as a constitutional right." Advocates [warn](#) the loss of funding will destabilize the state's health system, and the organization said it is considering all options to ensure patients' access to care.



Photo credit: AP Photo/Robert F. Bukaty, Fil

This week, the Governor of Illinois [signed](#) two laws expanding reproductive health access on public college campuses and strengthening protections for providers. HB3709 requires public universities and community colleges with student health services to provide students access to health care professionals who can prescribe and dispense contraception and medication abortion, including through on-campus pharmacies. HB3637 expands the state's shield law, protecting health providers, including midwives and drug distributors, from discipline for offering lawful care and allowing the prescription of drugs deemed safe by the World Health Organization, even if FDA approval is revoked. This amendment of the existing shield law provides a potential bulwark against future federal attempts to eliminate access to mifepristone.

Food for Thought



With so much going on in the world of reproductive health, law, and policy, every week we'll share articles, books, and media you might have missed.

[Amicus Podcast Interview with Karen Thompson from Pregnancy Justice](#)

[Your Period-Tracking App Might Be Violating Your Privacy. Here's How To Keep Your Data Safe](#)

[Anti-abortion Groups Have A New Strategy To End Telehealth Abortion](#)

[Health professionals and students say abortion restrictions in Wisconsin diminish care](#)

[Sixteen Hours, Two Flights, and a Pastor on Call: What It Takes for a Texan to Get an Abortion](#)



Reimagining the future of reproductive health, law, and policy.

UCLA Center on Reproductive Health, Law, and Policy is a think tank and research center created to develop long-term, lasting solutions that advance all aspects of reproductive justice, and address the current national crisis of abortion access.

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