

Brief Explainer on EO 12866 Meetings on the Proposed Regulation related to Reproductive Health Care Access for Unaccompanied Pregnant Youth

1. What is an EO 12866 meeting?

An EO 12866 meeting is the opportunity for members of the public to address pending federal regulation while it is still being reviewed, with the Office of Information and Regulatory Affairs (OIRA). These calls are only 30 minutes.

2. How do I schedule an EO 12866 meeting regarding this proposed regulation?

On the [landing page](#) for the proposed regulation, there is a link for “Request EO Meeting” that will take you to the request form [found here](#). You will fill out the form and submit it through the web page. Be mindful of what information you provide, as it is being given to the federal government; you will see language below the form that explains how information provided can be used by the government. You will receive an email with call information once a meeting is scheduled. Scheduled and past meetings appear on another link on the landing page, “View EO 12866 Meetings,” [found here](#).

3. What is the format of these meetings?

The calls take place over the telephone (you will be sent a call-in phone number). Based on the experiences of groups who have done these meetings so far, officials from OIRA and ORR attend these calls. They are in listening mode only and do not answer or ask any questions.

General Talking Points

These talking points are provided as a guide to assist you/your organization in preparing for your meeting with OIRA. You are encouraged to add talking points or expand on existing talking points to make them your own or more reflective of your organization’s expertise and experience. If you would like to share additional unique talking points that may be added to this document or need assistance in distributing talking points, reach out to Alexis at abay@theyoungcenter.org.

- **Introductions - please introduce yourself.**
 - The government officials on the call will likely identify themselves, their agency, and their position. If you can, please document who is on the call and share with the coalition after the call by emailing Alexis so that the coalition can keep track of the government officials who are attending these meetings.

- **(Optional) Share a brief explanation of your organization and work - why does this issue matter to your organization?**

- If you do decide to share, be mindful you are sharing information with government officials; it is fine to keep the information you share very brief and basic.

1. We are very concerned that the proposed rule will obstruct access to abortion-related care and services for unaccompanied immigrant youth in federal custody.

- a. We are concerned that a regulation barring the Office of Refugee Resettlement (ORR) from providing transportation to unaccompanied youth in ORR custody to receive abortion care, will significantly endanger the health of pregnant youth who do not wish to continue with their pregnancies or face a risk to their life due to a complicated pregnancy.
- b. Access to abortion for youth is a critical component of reproductive health care. Youth should have access to comprehensive reproductive health care to make the best and safest decisions for themselves and their families.

2. ORR should continue to provide transportation to pregnant youth to receive abortion-related care.

- i. If ORR were barred from providing transportation to youth for the purpose of obtaining abortion-related care, it would likely impede access to critical reproductive healthcare for pregnant youth who do not wish to continue with their pregnancies.
 - 1. Pregnant youth in ORR custody do not have access to financial resources or the ability to obtain funds while they are in custody, especially since their movement is restricted.
 - 2. At the same time, youth require transportation in order to access abortion services:
 - a. Pregnant youth are placed in facilities in a number of different states that vary in their restrictions on abortion. Many youth are held in Texas where there is a total abortion ban, while other pregnant youth are held in states where abortion care is widely available or in states where there are some restrictions.
 - b. Regardless, pregnant youth in states like Texas where abortion care is banned should not be deprived of abortion care on account of where the government decides to detain them. Pregnant youth held in states where abortion is legal, should not be denied the ability to seek care because they are in ORR custody.

- c. ORR's provision of transportation to youth to receive abortion care is crucial to ensure that that care is available to all pregnant youth regardless of where they are detained.

3. Pregnant Youth Need Access to Lifesaving Abortion Care.

- a. Maternal mortality is a serious risk to any pregnant person and especially to teenagers, who are known to have a greater chance of associated risks that lead to maternal mortality. For instance, youth from ages 10 to 19 years old face a higher risk of eclampsia, puerperal endometritis and systemic infection.
- b. Should ORR be barred from providing transportation for pregnant youth in custody to receive emergency abortion care, pregnant youth will be at a significant risk of death or suffering future complications to their reproductive health due to a dangerous pregnancy that could be prevented by receiving the emergency medical care they need.
- c. Since the *Dobbs* decision, there have been recorded deaths in Texas of teenagers due to the state's abortion ban, such as Nevaeh Crain ([See A Pregnant Teenager Died After Trying to Get Care in Three Visits to Texas Emergency Rooms](#)).

4. Conclusion

- a. Abortion care is critical for the reproductive health of young people. It is also an indispensable procedure when the life of a pregnant youth is in danger.
- b. We oppose any regulatory change that would block ORR from providing transportation to youth who seek to receive abortion care or would otherwise impede access to vital reproductive health care.