

I. Summary

Since its last UPR process in 2020, the U.S. has adopted regressive measures in the areas of **(1) homelessness** and **(2) access to abortion**.

In the area of homelessness, the U.S. has taken a step backward following the Supreme Court ruling in *Grants Pass v. Johnson*. Local governments now have the discretion to criminalize homelessness, leading to numerous human rights violations. These ordinances disproportionately affect minorities, who are overrepresented in the homeless population. The U.S. must ensure the rights to housing, life, due process, and non-discrimination are not undermined by regressive policies that criminalize homelessness.

In the area of access to abortion, the U.S. has violated its human rights obligations by overturning *Roe v. Wade* with *Dobbs v. Jackson Women's Health Organization*, allowing for the implementation of state laws criminalizing abortion and limiting women's access to reproductive health care. Through these actions, the U.S. violates women's rights to life, to be free from discrimination, and to be free from cruel, inhuman, and degrading treatment (CIDT).ⁱ The U.S. should instead adopt measures necessary to protect the right to an abortion.

II. The Criminalization of Homelessness

A. After the *Grants Pass* ruling, local governments in California have taken regressive steps toward addressing the homelessness crisis by enacting harmful local ordinances criminalizing homelessness.

1. The U.S. Supreme Court overruled *Martin v. Boise* with *Grants Pass* in 2024, significantly altering the legal landscape surrounding homelessness and local ordinances.ⁱⁱ *Martin v. Boise* prohibited anti-camping ordinances and banned the criminalization of conduct that is a consequence of being homeless.ⁱⁱⁱ This included penalties for “sitting, sleeping, or lying outside on public property,” when there is a lack of adequate shelter.^{iv} *Grants Pass* has allowed local governments to perpetuate the cycle of poverty and homelessness by giving them liberty to enact aggressive and harmful local ordinances criminalizing homelessness.

2. At the state level, Governor Newsom enacted an executive order requiring state agencies in California to clear encampments on state property.^v Caltrans, a state agency, has cleared 11,188 encampments since July 2021.^{vi} Additionally, Governor Newsom's order explicitly states that “local governments are encouraged to adopt policies consistent with this Order.”^{vii} Subsequently, more than two dozen California cities have passed, strengthened, or are considering ordinances that penalize people for sleeping outside.^{viii}

3. According to the National Alliance to End Homelessness, California alone accounts for roughly 28% of the homeless population in the United States.^{ix} Homelessness is a significant issue in Los Angeles County, with an estimated 75,312 individuals experiencing homelessness in 2024.^x Santa Monica, an L.A. suburb, strengthened its ordinance prohibiting camping in public places and preventing homeless individuals from occupying a camping facility.^{xi} The revised ordinance removed language that allowed unhoused individuals to use sleeping bags, blankets, and pillows while sleeping and instead allows authorities to enforce camping regulations by considering these items when determining if a public space is being used as a camping facility.^{xii} This ordinance imposes liability on unhoused individuals for possessing basic necessities, such as sleeping bags.^{xiii}

4. Fremont, a city in the Bay Area with a high cost of living, reported a 21% reduction in homelessness since 2022.^{xiv} Despite the reduction in homelessness rates, the city chose to adopt a notably punitive ordinance in response to the *Grants Pass* decision. Fremont's ordinance makes it unlawful to camp on any public property including the sidewalk, street, and parks.^{xv} The ordinance is particularly punitive, allowing a \$1,000 maximum fine and six months imprisonment for the misdemeanor offense.^{xvi} The ordinance originally sought to punish individuals for aiding and abetting in a violation under the ordinance, potentially extending liability to service providers.^{xvii} This means that essential service providers who offer resources and shelter to the homeless population could have faced misdemeanor charges. Following public outcry, Fremont dropped the "aiding and abetting" provision from the ordinance, but this attempt illustrates the repressive nature of policies under consideration.^{xviii}

i. Encampment sweeps constitute forced eviction under international law and violate the rights to adequate housing, life, to be free from cruel and unusual punishment, and to freedom of movement.

5. Forced eviction is a violation of human rights, specifically the right to housing, because it is "the permanent or temporary removal against their will of individuals, families and/or communities from the homes and/or land which they occupy, without the provision of, and access to, appropriate forms of legal or other protection."^{xix} The UN describes forced evictions as punitive and requires that States provide adequate alternative resources including "alternative housing, resettlement, or access to productive land."^{xx} Accordingly, encampment sweeps violate Article 25 of the UDHR and Article 17 of the ICCPR.^{xxi}

6. Encampment sweeps also put unhoused individuals at risk of harm resulting in violations of the right to life under Article 6, the right to be free from CIDT under Article 7, and the right to freedom of movement under Article 12 of the ICCPR.^{xxii} In a recent case in Vallejo, California, a man was crushed to death after sustaining numerous blunt force injuries due to an encampment sweep conducted with heavy machinery.^{xxiii} Encampment sweeps increase mortality by disconnecting unhoused individuals from health care services and raise the risk of serious injuries, often life-threatening, due to inadequate safeguards.^{xxiv}

7. Encampment sweeps also violate the right to due process under Articles 14 and 26 of the ICCPR.^{xxv} In a recent case, a federal judge blocked the city of Vallejo, California from displacing an unhoused woman living in a makeshift home of tarp and wooden beams.^{xxvi} The judge found the city gave her insufficient time to relocate and determined that the sweep violated her due process rights by leaving her in a worse situation, exposing her to increasingly dangerous conditions, without providing alternative housing.^{xxvii} Although due process violations in encampment sweeps are common, judicial remedy is rare.

8. States must ensure that forced evictions do not violate the principles of human dignity, reasonableness, due process, and proportionality.^{xxviii} Encampment sweeps destroy property including life-saving materials such as medication, clothing, and other materials that protect homeless individuals from outside elements.^{xxix} They also sever access to healthcare and service providers by making it more difficult for service providers to track individuals and provide services including permanent housing.^{xxx} Encampment sweeps result in further alienation from the community and network of service providers, leading to mental health issues and feelings of isolation.^{xxxi} Additionally, encampment sweeps disrupt mutual support networks formed among encampment residents.^{xxxii}

ii. The criminalization of homelessness disproportionately affects minorities and people of color.

9. The U.S. is in violation of Article 26 of the ICCPR and Article 5(e)(iii) of CERD, which prohibits racial discrimination in the right to housing.^{xxxiii} The U.S. fails to prevent the criminalization of homelessness and its disproportionate impact on minorities.

10. According to the U.S. Interagency Council on Homelessness, Black and Hispanic/LatinX individuals are drastically overrepresented in the unhoused population.^{xxxiv} Black people make up about 12% of the U.S. population but comprise 37% of the unhoused population, while Hispanic/Latino individuals account for 19% of the U.S. population and 24% of the total population experiencing homelessness.^{xxxv} According to the U.S. Census Bureau's 2021 American Community Survey, the American Indian and Alaska Native population was estimated to be around 8.7 million, roughly 2.6% of the total population.^{xxxvi} Additionally, the U.S. Department of Housing and Urban Development (HUD) noted that in 2024 minorities including African American, Alaska Native, and Indigenous populations comprised 69% of the population of individuals experiencing homelessness.^{xxxvii}

11. California reflects these national trends.^{xxxviii} According to the 2023 Point-In-Time count homelessness survey conducted in Santa Clara County, California, 41% of the unhoused population listed their ethnicity as Hispanic/LatinX.^{xxxix} The 2024 survey in Sacramento County, California, found that 42% of the unhoused population identified as White, followed by 33% who identified as Black.^{xl} These statistics emphasize the disproportionate impact homelessness

and associated rights violations have on minority populations.

B. Past recommendations and U.S. government inaction

12. In 2020, the U.S. received several recommendations regarding the criminalization of poverty. Malta suggested that the U.S. should, “continue to reduce the role of policing as a response to societal problems largely related to poverty, while investing in direct solutions to those problems that do not involve criminalization.”^{xli} Additionally, several States recommended that the U.S. take steps to end the criminalization of poverty and take adequate measures to reduce homelessness in vulnerable groups, particularly for African Americans.^{xlii}

13. In response, the U.S. stated that it supports “investing in direct solutions to alleviate the personal and social problems surrounding issues of poverty.”^{xliii} The U.S. has not complied with these recommendations to address homelessness. The June 2024 *Grants Pass* decision instead encourages the criminalization of homelessness. Rather than taking adequate steps to address homelessness, the U.S. is instead implementing aggressive measures to punish the unhoused population for experiencing homelessness, including by imposing harsh fines and conducting encampment sweeps.

C. Recommendations

14. The U.S. should prohibit the criminalization of homelessness and protect vulnerable unhoused populations.

15. The U.S. should encourage local governments to offer resources, including mental health services and access to service providers, to help unhoused individuals transition into permanent housing.

16. The U.S. should encourage states and local governments to address the root cause of homelessness, which is a lack of deeply affordable housing.

III. The Criminalization of Abortion

A. U.S. federal and state actions restricting access to abortion violate human rights obligations.

17. The U.S. Supreme Court’s decision in *Dobbs* removed constitutional protection for abortion, allowing states to limit or ban abortion.^{xliv} As of March 2025, twelve U.S. states have full bans.^{xlv} Abortion is banned in six states after 6-12 weeks of gestation, and in ten states after 18-24 weeks of gestation.^{xlvi} Although most bans have exceptions for threats to the pregnant person’s life, many do not allow exceptions for rape, incest, fetal anomaly, or threats to a pregnant person’s physical health.^{xlvi}

18. Since the overturn of *Roe v. Wade*, states with restrictive bans have “fewer maternity care providers, more maternity care deserts, and higher rates of maternal mortality and infant death” than do states where abortion is legal.^{xlvi} These trends disproportionately harm Black and Indigenous women,^{xlix} who have “historically faced significantly higher rates of maternal mortality” than white women.^l These restrictive laws also subject women to CIDT by forcing them to carry non-viable fetuses longer than is medically necessary or safe.^{li}

i. State statutes criminalizing abortion have caused healthcare providers to withhold or delay necessary obstetric medical care.

19. Since *Dobbs*, several states have passed “confusing” abortion laws.^{lii} The U.S. has violated the prohibition against CIDT under CAT and the ICCPR by allowing abortion bans to impose confusing legal restrictions, which cause healthcare providers to withhold or delay necessary, adequate, and timely healthcare.^{liii}

20. Although some abortion bans have exceptions, medical providers warn that “these exceptions use vague, non-medical language” and are “extremely difficult to follow and apply.”^{liv} Misinterpretations of legal exceptions include large fines, imprisonment, or loss of medical licenses, meaning “important health decisions are being made by lawyers, not medical professionals.”^{lv} Experts posit that restrictive abortion laws “pit doctors’ fears of prosecution against their patients’ health needs, requiring providers to make sure” patients are “on the brink of death or facing irreversible harm” before they intervene.^{lvi}

21. In October 2023, a pregnant teenager named Nevaeh Crain died in Texas after three emergency room visits failed to treat her miscarriage.^{lvii} Despite Nevaeh presenting with nausea, vomiting, and bleeding, Nevaeh’s doctors repeatedly ignored signs of sepsis, insisting on two ultrasounds to confirm there was no fetal heartbeat.^{lviii} With “old, black blood gush[ing] from her nostrils and mouth,” Nevaeh died of internal bleeding and organ failure.^{lix}

22. In July 2022, a single mother named Amber Thurman died after obtaining abortion pills in North Carolina.^{lx} Amber developed a rare complication at home in Georgia and needed a routine procedure to clear dead fetal tissue remaining in her uterus; afraid of criminal prosecution, doctors delayed for 20 hours despite sepsis and organ failure.^{lxi} Amber died during

the routine procedure.^{lxii}

23. In August 2022, Mylissa Farmer’s water broke at 17 weeks.^{lxiii} The baby was dying; Mylissa was at risk of sepsis, infertility, or death if she did not receive an abortion, but the hospital would not provide one due to Missouri’s ban.^{lxiv} After four days, Mylissa went into labor and traveled to Illinois for an abortion, facing harassment from protestors.^{lxv} She ultimately moved away from Missouri to escape “the harrowing, traumatic memories” of her loss and ostracism from her community.^{lxvi}

24. In November 2022, Deborah Dorbert’s fetus was diagnosed at 24 weeks with a rare and lethal condition.^{lxvii} Florida’s abortion ban had exceptions for fatal fetal abnormalities, but since the fetus had a heartbeat, her doctors refused to provide an abortion.^{lxviii} Induced at 37 weeks, Deborah watched her baby Milo die as his underdeveloped lungs failed.^{lxix} Deborah is “haunted” by the sounds of Milo gasping for air and “the sight of his body struggling” against his “inevitable” death.^{lxx} Struggling with anxiety and depression, Deborah says that “the law has created torture.”^{lxxi}

25. The U.S. has violated the prohibition against CIDT under CAT and ICCPR Article 7 because confusing legal restrictions imposed by abortion bans lead to the unnecessary delay of adequate and life-saving healthcare.^{lxxii}

ii. State statutes criminalizing abortion have increased maternal mortality rates, disproportionately impacting minority groups.

26. The U.S. has violated the rights to life and to be free from discrimination under ICCPR by allowing restrictions on access to necessary reproductive healthcare to disproportionately impact low-income minority women.^{lxxiii} These restrictions also violate the right to non-discriminatory public health and medical care under CERD.^{lxxiv}

27. In 2019, the U.S. maternal mortality rate was 20.1 deaths per 100,000 live births; this increased to 23.8 in 2020.^{lxxv} In 2020, the rate for Black women was 2.9 times higher than the rate for white women (55.3 versus 19.07).^{lxxvi} In 2023, this disparity further widened, with a rate of 50.3, more than three times the rate for white women (14.5).^{lxxvii}

28. At the state level, rates have risen, particularly in Texas and other states with severe abortion restrictions.^{lxxviii} From 2019 to 2022, rates in Texas rose by 56%, much higher than the 11% increase nationwide during the same period.^{lxxix} After the passage of Texas’ restrictive abortion ban, the rate among white women “nearly doubled” from 20 to 39.1; among Hispanic women, from 14.5 to 18.9; and among Black women, from 31.6 to 43.6.^{lxxx}

29. The U.S. has violated ICCPR Article 6 because restrictive abortion bans deprive women of life-saving reproductive healthcare, leading to higher maternal mortality rates.^{lxxxi}

30. The U.S. has violated CERD Article 5 and ICCPR Article 26 because restrictive abortion bans disproportionately impact women of color and their right to receive nondiscriminatory medical care.^{lxxxii}

iii. The federal Hyde Amendment discriminatorily limits access to abortion for women of low income and of color.

31. In the U.S., the Hyde Amendment blocks federal funds for abortion services for Medicaid enrollees, disproportionately impacting low-income individuals and women of color.^{lxxxiii}

32. Even in states allowing abortion, the Hyde Amendment effectively blocks abortion coverage “in most circumstances” unless states use their own funds.^{lxxxiv} While the Hyde Amendment requires coverage for rape, incest, and life endangerment, since *Dobbs*, people living in many states cannot legally obtain an abortion even for Hyde exceptions.^{lxxxv} This is because, although most bans have exceptions for life endangerment, most do not have exceptions for rape or incest.^{lxxxvi} Without federal enforcement, states refuse to apply these exceptions to Medicaid enrollees.^{lxxxvii}

33. Restricting federal funding for abortion services impacts people of color who disproportionately rely on Medicaid for health care coverage.^{lxxxviii} The Hyde Amendment also impacts Tribal members receiving care through the Indian Health Service, effectively denying Native American women access to abortion.^{lxxxix}

34. The U.S. violates Article 1 of CERD and Article 26 of the ICCPR by refusing to fund health services needed only by women and by disproportionately denying abortion access to low-income women of color.^{xc}

B. Past recommendations and U.S. government inaction

35. During the previous UPR, the U.S. received recommendations to ensure that women and girls have access to sexual and reproductive health services.^{xcii} The U.S. responded, affirming that “it is the policy of the U.S. to support women’s and girls’ sexual and reproductive health and rights.”^{xciii}

36. The U.S. has not yet implemented these recommendations. Instead, the U.S. has violated women’s human rights by allowing for the implementation of restrictive abortion laws.

C. Recommendations

37. The U.S. should adopt legislation that enshrines a nondiscriminatory right to abortion for all women.

38. The U.S. should standardize how it measures and tracks maternal mortality, disaggregated by race.

39. The U.S. should repeal laws that criminalize abortion, both for those seeking and performing abortions. At a minimum, U.S. law must guarantee access to abortion in cases of severe fetal abnormality, rape, incest, and where the pregnancy threatens the life of the pregnant person.^{xciii}

ⁱ The U.S. has ratified the International Covenant on Civil and Political Rights (ICCPR), the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT), and the International Convention on the Elimination of all forms of Racial Discrimination (CERD). United Nations Human Rights Office of the High Commissioner. “Ratification Status for United States of America.” UN Treaty Body Database, last visited Mar. 20, 2025 (https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=187&Lang=en).

ⁱⁱ *City of Grants Pass v. Johnson*, 603 U.S. 520 (2024).

ⁱⁱⁱ *Martin v. City of Boise*, 920 F.3d 584 (9th Cir. 2019).

^{iv} Amanda Karras, *Supreme Court Overrules Martin v. Boise in Important Homeless Encampment Case*, Int’l Municipal Lawyers Association (June 28, 2024), <https://imla.org/2024/06/supreme-court-overrules-martin-v-boise-in-important-homeless-encampment-case/>.

^v Gavin Newsom, Executive Order N-1-24 (July 25, 2024), <https://www.gov.ca.gov/wp-content/uploads/2024/07/2024-Encampments-EO-7-24.pdf>.

^{vi} Marisa Kendall, *Newsom Orders CA Agencies to Clear Homeless Encampments — But to Where?*, CalMatters (July 25, 2024), <https://calmatters.org/housing/homelessness/2024/07/newsom-homeless-encampments-order/>.

^{vii} Gavin Newsom, Executive Order N-1-24 (July 25, 2024), <https://www.gov.ca.gov/wp-content/uploads/2024/07/2024-Encampments-EO-7-24.pdf>.

^{viii} Marisa Kendall, *CA Cities OK New Homeless Camp Bans After Supreme Court Case*, CalMatters (Sept. 12, 2024), <https://calmatters.org/housing/homelessness/2024/09/camping-ban-ordinances/>.

^{ix} Daniel Soucy, Makenna Janes & Andrew Hall, *State of Homelessness: 2024 Edition*, Nat’l Alliance to End Homelessness, <https://endhomelessness.org/state-of-homelessness/>.

^x Los Angeles Homeless Servs. Auth., *2024 Greater Los Angeles Homeless Count Results (Long Version)*, <https://www.lahsa.org/documents?id=8164-2024-greater-los-angeles-homeless-count-results-long-version-.pdf>.

^{xi} Santa Monica, Cal., Ordinance No. 2728CCS § 4.08.095 (2022), <https://ecode360.com/42726999#42727006>.

^{xii} Santa Monica, *Addressing Homelessness: Questions and Answers on Santa Monica’s Anti-Camping Ordinance*, (Sept. 13, 2024), <https://www.santamonica.gov/blog/addressing-homelessness-questions-and-answers-on-santa-monica-s-anti-camping-ordinance>.

^{xiii} Santa Monica, Cal., Ordinance No. 2728CCS § 4.08.095 (2022), <https://ecode360.com/42726999#42727006>.

^{xiv} City of Fremont, *City Sharing 2024 Alameda County Point-in-Time Homeless Count Results*, City of Fremont, <https://www.fremont.gov/Home/Components/News/News/926/>.

^{xv} Fremont, Cal., City of Fremont Anti-Homeless Ordinance (Feb. 11, 2025), <https://wraphome.org/2025/02/04/fremont-ca-city-of-fremont-anti-homeless-ordinance-2-11-25/>.

- ^{xvi} Fremont, Cal., City of Fremont Anti-Homeless Ordinance (Feb. 11, 2025), <https://wraphome.org/2025/02/04/fremont-ca-city-of-fremont-anti-homeless-ordinance-2-11-25/>.
- ^{xvii} *Id.*
- ^{xviii} CalMatters, Fremont’s Camping Ordinance Clause Removal: What It Means for Homelessness, *CalMatters* (Mar. 2025), <https://calmatters.org/housing/homelessness/2025/03/fremont-camping-ordinance-clause-removal/>.
- ^{xix} UN Committee on Economic, Social and Cultural Rights (CESCR), General Comment No. 7: The right to adequate housing (Art.11.1): forced evictions, E/1998/22, 20 May 1997, <https://www.refworld.org/legal/general/cescr/1997/en/53063>.
- ^{xx} *Id.*
- ^{xxi} Universal Declaration of Human Rights, art. 25, (Dec. 10, 1948); International Covenant on Civil and Political Rights art. 17), *adopted* Dec. 16, 1966, 999 U.N.T.S. 171 [hereinafter ICCPR].
- ^{xxii} ICCPR, arts. 6, 7, 12.
- ^{xxiii} Vanessa Rancano, *Unhoused Man Killed in Vallejo Trash Cleanup on Christmas Eve; City Acknowledges Incident*, KQED (Feb. 26, 2025), <https://www.kqed.org/news/12028660/unhoused-man-killed-vallejo-trash-cleanup-christmas-eve-city-acknowledges>.
- ^{xxiv} Joshua A. Barocas, M.D., Samantha K. Nall, MPH, Sarah Axelrath, M.D., et al., “Population-Level Health Effects of Involuntary Displacement of People Experiencing Unsheltered Homelessness Who Inject Drugs in US Cities,” *JAMA*. 2023;329(17):1478-1486. doi:10.1001/jama.2023.4800 (Apr. 10, 2023) (<https://jamanetwork.com/journals/jama/fullarticle/2803839>). This multidisciplinary study found that all models of encampment sweeps that involve involuntary displacement result in significant increases in morbidity, mortality, and shortened life expectancy for affected populations. The results projected that these policies could contribute to 15-25% of deaths among unhoused individuals over a ten year period.
- ^{xxv} ICCPR Art. 14 and Art. 26.
- ^{xxvi} Vicky Rancano, *This Bay Area Woman's Legal Victory Challenges California's Homeless Encampment Crackdown*, KQED (Feb. 26, 2025), <https://www.kqed.org/news/12028502/this-bay-area-womans-legal-victory-challenges-californias-homeless-encampment-crackdown>.
- ^{xxvii} *Id.*
- ^{xxviii} Special Rapporteur on the Right to Adequate Housing, *Forced Evictions*, U.N. Office of the High Comm’r for Human Rights, <https://www.ohchr.org/en/special-procedures/sr-housing/forced-evictions>
- ^{xxix} Nat’l Health Care for the Homeless Council, *Encampment Sweeps: An Issue Brief* (Dec. 2022), <https://nhchc.org/wp-content/uploads/2022/12/NHCHC-encampment-sweeps-issue-brief-12-22.pdf>.
- ^{xxx} *Id.*
- ^{xxxi} *Id.*
- ^{xxxii} Professor Jesilyn Faust, *Research and Data Presentation on the Experience of Unhoused Women in Silicon Valley*, (Santa Clara University, Feb. 22, 2025).
- ^{xxxiii} International Convention on the Elimination of All Forms of Racial Discrimination, art. 5, § (e)(iii), adopted Dec. 21, 1965, 660 U.N.T.S. 195, <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-convention-elimination-all-forms-racial>.
- ^{xxxiv} *Data & Trends*, U.S. Interagency Council on Homelessness, <https://www.usich.gov/guidance-reports-data/data-trends>.
- ^{xxxv} *Id.*
- ^{xxxvi} U.S. Census Bureau, *American Indian and Alaska Native Alone or in Combination with One or More Other Races: 2021*, U.S. Census Bureau, <https://data.census.gov/table/ACSDT1Y2021.B02010?q=B02010:+AMERICAN+INDIAN+AND+ALASKA+NATIVE+ALONE+OR+IN+COMBINATION+WITH+ONE+OR+MORE+OTHER+RACES&g=010XX00US&tid=ACSDT1Y2021.B02010>.
- ^{xxxvii} *The 2024 Annual Homeless Assessment Report (AHAR) to Congress: Part 1*, U.S. Dep’t of Housing & Urban Dev., <https://www.huduser.gov/portal/sites/default/files/pdf/2024-AHAR-Part-1.pdf>.
- ^{xxxviii} The California Statewide Study of People Experiencing Homelessness similarly found that although only 7% of California’s population identifies as Black, 26% of Californians experiencing homelessness do so. Benioff Housing and Homelessness Initiative, University of California San Francisco, *Toward Equity: Understanding Black Californians’ Experiences of Homelessness* (Feb. 2024), <https://homelessness.ucsf.edu/sites/default/files/2024-02/Black%20CA%20Report%202024.pdf>. Similarly, the study found that 12% identified as Indigenous and 35% as Latino/x. Benioff Housing and Homelessness Initiative, University of California San Francisco, *Executive Summary of the California Statewide Study of People Experiencing Homelessness* (June 2023), https://homelessness.ucsf.edu/sites/default/files/2023-06/CASPEH_Executive_Summary_62023.pdf.

^{xxxix} 2023 *Santa Clara County Homeless Census and Survey: Point-in-Time Count*, Santa Clara Cnty. Office of Supportive Housing, <https://osh.santaclaracounty.gov/reports-and-publications-library/point-time-count-2023-santa-clara-county-homeless-census-and-survey>.

^{xl} 2024 *Sacramento Point-in-Time (PIT) Count Report*, Sacramento Steps Forward, <https://sacramentostepsforward.org/wp-content/uploads/2024/06/PIT-Report-2024-06-04-Final-with-Cover.pdf>.

^{xli} A/HRC/46/15/ Report of the Working Group on the Universal Periodic Review, United States of America. UN Human Rights Council forty-sixth session, February - March 2021. Para. 26.255.

^{xlii} *Id.* at Para. 26.284-26.287.

^{xliii} A/HRC/46/15/Add.1. Report of the Working Group on the Universal Periodic Review, United States of America. Addendum: Views on conclusions and/or recommendations, voluntary commitments, and replies presented by the State under review. UN Human Rights Council forty-sixth session, February - March 2021. Para. 12.

^{xliv} *Dobbs v. Jackson Women's Health Org.*, 597 U.S. 215 (2022). Notwithstanding the system of federalism in the U.S., which divides power between the federal government and individual states, treaty obligations bind all government actors, including state and local officials in federalist forms of government. Therefore, the U.S. as a single entity is internationally responsible for all federal and local state actions which restrict access to abortion and thereby violate women's human rights. Rivera Juaristi, Francisco J. "U.S. Exceptionalism and the Strengthening Process of the Inter-American Human Rights System." Human Rights Brief 20, no. 2 (2013): 19-25. Abortion is legal up to fetal viability in 13 states, including Missouri. In November 2024, voters in Missouri passed a ballot measure that will amend the state's constitution to protect reproductive freedom and allow abortions up to fetal viability. In December 2024, a court blocked enforcement of the previous abortion ban under Missouri's new reproductive freedom constitutional amendment. "Abortion in the United States Dashboard." KFF.org, last updated Dec. 20, 2024 (<https://www.kff.org/womens-health-policy/dashboard/abortion-in-the-u-s-dashboard/>). The remaining states and D.C. do not have legislation regarding gestational limits for abortion. See also "State bans on abortion throughout pregnancy." Guttmacher Institute, last updated Mar. 5, 2025 (<https://www.guttmacher.org/state-policy/explore/state-policies-abortion-bans>).

^{xlv} In Texas, a pre-*Roe* ban and state trigger law are currently in effect. "Abortion in the United States Dashboard." KFF.org, last updated Dec. 20, 2024 (<https://www.kff.org/womens-health-policy/dashboard/abortion-in-the-u-s-dashboard/>).

"Pre-*Roe* bans" are abortion bans that states never repealed after *Roe* made them unenforceable in 1973. Once *Roe* was repealed, these "pre-*Roe* bans" were revived. "Trigger laws" are abortion bans passed after *Roe*, and were intended to ban abortion if the Supreme Court ever limited or repealed *Roe* or if a federal Constitutional amendment was ever passed that prohibited abortion. "After *Roe* Fell: Abortion laws by state." Center for Reproductive Rights, last accessed Mar. 7, 2025 (<https://reproductiverights.org/maps/abortion-laws-by-state/>). See also "State bans on abortion throughout pregnancy." Guttmacher Institute, last updated Mar. 5, 2025 (<https://www.guttmacher.org/state-policy/explore/state-policies-abortion-bans>).

^{xlvi} In Georgia, there is a ban on abortion after 6 weeks of gestation. Even though this ban has been blocked by a state court, the ban is still enforced as litigation is still ongoing. In Florida, there is a ban on abortion after 6 weeks of gestation. In Ohio, the state's 6-week ban was blocked by a judge and now abortion is allowed up to 20 weeks of gestation. In 2023, voters in Ohio passed a ballot measure amending the state's constitution to protect the right to abortion. "Abortion in the United States Dashboard." KFF.org. See also "State bans on abortion throughout pregnancy." Guttmacher Institute, last updated Mar. 5, 2025 (<https://www.guttmacher.org/state-policy/explore/state-policies-abortion-bans>).

^{xlvii} "State bans on abortion throughout pregnancy." Guttmacher Institute.

^{xlviii} Kelly Baden, Jeorg Dreweke, & Candance Gibson. "Clear and growing evidence that *Dobbs* is harming reproductive health and freedom." Guttmacher Institute, May 2024 (<https://www.guttmacher.org/2024/05/clear-and-growing-evidence-dobbs-harming-reproductive-health-and-freedom>). Citing Eugene Declercq, Ruby Barnard-Mayers, Laurie C. Zephyrin, & Kay Johnson. "The U.S. Maternal Health Divide: The Limited Maternal Health Services and Worse Outcomes of States Proposing New Abortion Restrictions." The Commonwealth Fund, Dec. 14, 2022 (<https://www.commonwealthfund.org/publications/issue-briefs/2022/dec/us-maternal-health-divide-limited-services-worse-outcomes>). See also *Roe v. Wade*, 410 U.S. 113 (1973).

^{xlix} For purposes of meeting the word limits for this submission, this report uses the term "women" to refer to all persons capable of becoming pregnant.

^l Baden, Dreweke, & Gibson. "Clear and growing evidence that *Dobbs* is harming reproductive health and freedom." Citing Liza Fuentes. "Inequity in US Abortion Rights and Access: The End of *Roe* Is Deepening Existing Divides." Guttmacher Institute, January 2023 (<https://www.guttmacher.org/2023/01/inequity-us-abortion-rights-and-access-end-roe-deepening-existing-divides>).

^{li} Cases of women carrying non-viable fetuses longer than is medically necessary or safe are provided in subsection

i, *infra*. There are countless studies of women who are “blocked from treatment by hospitals” that are “fearful of misinterpreting their state’s abortion ban or because they do not qualify for the exceptions that may exist.” Baden, Dreweke, & Gibson. “Clear and growing evidence that *Dobbs* is harming reproductive health and freedom.”

^{lii} “In states with abortion bans, emergency physicians often feel caught between confusing laws and their duty to provide quality care...[Emergency Department] staff sometimes are afraid to perform any sort of procedure, such as those for miscarriage management, that could be interpreted as ending a pregnancy.” Stacy Weiner. “Emergency doctors grapple with abortion bans.” Association of American Medical Colleges, Oct. 22, 2024 (<https://www.aamc.org/news/emergency-doctors-grapple-abortion-bans>).

^{liii} CAT. Article 7 of the ICCPR also prohibits torture or cruel, inhuman, or degrading treatment. The UN Human Rights Committee has also interpreted Article 6 of the ICCPR to require that, in terms of abortion, any laws that restrict abortion “must not, inter alia, jeopardize [women’s] lives or subject them to physical or mental pain or suffering which violates article 7” of the ICCPR. In fact, safe access to abortion must be provided “to protect the life and health of pregnant women” as well as “in situations in which carrying a pregnancy to term would cause the woman substantial pain or suffering,” including “where the pregnancy is the result of rape or incest or when the fetus suffers from fatal impairment.” General Comment No. 36 on article 6 of the ICCPR, on the right to life. Human Rights Committee. Para. 9

(https://www.ohchr.org/sites/default/files/Documents/HRBodies/CCPR/GCArticle6/GCArticle6_EN.pdf).

^{liv} Elizabeth Nash. “Focusing on exceptions misses the true harm of abortion bans.” Guttmacher Institute, Dec. 2022 (<https://www.guttmacher.org/article/2022/12/focusing-exceptions-misses-true-harm-abortion-bans>).

^{lv} *Id.*

^{lvi} Kavitha Surana. “Abortion bans have delayed emergency medical care. In Georgia, experts say this mother’s death was preventable.” Propublica, Sept. 16, 2024 (<https://www.propublica.org/article/georgia-abortion-ban-amber-thurman-death>).

^{lvii} Ms. Crain visited two different hospitals. The first hospital diagnosed her with strep throat, failing to investigate her “sharp abdominal pain” and the “blood staining her thighs.” The second hospital realized she had sepsis but sent Ms. Crain home, as her fetus still had a heartbeat. Ms. Crain returned to the second hospital for her third and final visit before the two ultrasounds confirmed “fetal demise.” The first ultrasound found no heartbeat but nearly 2 hours later when she was finally sent to the ICU, her organs were already failing and she was bleeding internally. Lizzie Presser and Kavitha Surana. “A pregnant teenager died after trying to get care in three visits to Texas emergency rooms.” Propublica, Nov. 1, 2024. (<https://www.propublica.org/article/nevaeh-crain-death-texas-abortion-ban-embtala>).

^{lviii} *Id.* Although the ban includes an exception for when the pregnant person’s life is threatened, doctors reported that “confusion and fear about the potential legal repercussions are changing the way their colleagues treat pregnant patients with complications.” Texas Senate Bill 8 (SB-8) states that “a physician may not knowingly perform or induce an abortion on a pregnant woman if the physician detected a fetal heartbeat for the unborn child . . . or failed to perform a test to detect a fetal heartbeat.” Texas SB-8 Section 171.204. Medical providers that perform or induce an abortion in violation of SB-8 could be sued by “any person, other than an officer or employee of a state or local governmental entity” for damages “in an amount of not less than \$10,000 for each abortion that the [medical provider] performed or induced.” Texas SB-8 Section 171.208.

^{lix} Presser & Surana. “A pregnant teenager died after trying to get care in three visits to Texas emergency rooms.”

^{lx} Surana. “Abortion bans have delayed emergency medical care. In Georgia, experts say this mother’s death was preventable.”

^{lxi} *Id.* Routine dilation and curettages (D&Cs) have been used for both abortions and miscarriages. It is a “fairly common, minor surgical procedure” used to remove fetal tissue. In July 2022, Georgia ruled to allow House Bill 481 (HB-481) to take effect, which had been passed in 2019. HB-481 made it illegal to perform an abortion if a fetal heartbeat was detected (around 6 weeks gestation) with few exceptions, including when a physician “determines in reasonable medical judgment” that a “medical emergency exists.” A “medical emergency” is defined in HB-481 as “a condition in which an abortion is necessary in order to prevent the death of the pregnant woman or the substantial and irreversible impairment of a major bodily function of the pregnant woman.” HB-481 Section 4. Additionally, failure by a physician to comply with the requirements meant they would be subject to medical licensing sanctions. HB-481 Section 10. These provisions have caused confusion, including the delay in care that led to Ms. Thurman’s death. Dara Kass & Julie F. Kay, “The Supreme Court Cost Amber Thurman Her Life.” Slate, Sept. 18, 2024. (<https://slate.com/news-and-politics/2024/09/georgia-abortion-ban-supreme-court-killed-amber-thurman.html>).

^{lxii} By the time her doctors started surgery, Ms. Thurman’s bowel needed to be removed. Additionally, after the D&C, her doctor “immediately continued with a hysterectomy.” Experts posit that restrictive abortion laws such as

the one in Georgia “pit doctors’ fears of prosecution against their patients’ health needs, requiring providers to make sure their patient was [virtually] on the brink of death or facing irreversible harm” before they intervene with medically indicated procedures like D&Cs. Surana. “Abortion bans have delayed emergency medical care. In Georgia, experts say this mother’s death was preventable.”

^{lxiii} Mylissa was at risk of “sepsis, loss of her uterus, and even death.” Kylie Cheung. “Missouri woman denied emergency abortion called a state senator for help. He sent her to an anti-abortion clinic.” Jezebel, Oct. 18, 2022 (<https://www.jezebel.com/missouri-woman-denied-emergency-abortion-called-a-state-1849672223>).

^{lxiv} Mylissa Farmer. “Opinion: I was denied a life-saving abortion at two hospitals. Here’s what I think of the Supreme Court decision.” CNN, June 28, 2024 (<https://www.cnn.com/2024/06/27/opinions/emtala-scotus-ruling-emergency-abortion-idaho-farmer/index.html>).

Passed in June 2022, Missouri’s statute stated that “no abortion shall be performed or induced upon a woman, except in cases of medical emergency. Any person who knowingly performs or induces an abortion of an unborn child . . . shall be guilty of a class B felony, as well as subject to suspension or revocation of his or her professional license.” Missouri Title XII Public Health & Welfare section 188.017(2). In November 2024, voters in Missouri passed a ballot measure that will amend the state’s constitution to protect reproductive freedom and allow abortions up to fetal viability. In December 2024, a court blocked enforcement of the previous abortion ban under Missouri’s new reproductive freedom constitutional amendment. “Abortion in the United States Dashboard.” KFF.org.

^{lxv} Mylissa called numerous doctors and experts “across countless states.” Desperate, she even called the office of her state senator seeking help, but his office referred her to an anti-abortion clinic. The state senator’s office also promised to speak to the state Attorney General on her behalf, but Ms. Farmer never heard from them again. Cheung. “Missouri woman denied emergency abortion called a state senator for help. He sent her to an anti-abortion clinic.”

^{lxvi} Ms. Farmer also has struggled to pay her medical bills from the care she received as well as medical care from complications. Additionally, her mental health has suffered, as she dealt with “feeling so low that it was often impossible to get out of bed.” Ms. Farmer found out that after *Roe v. Wade* was overturned, “hospitals began turning away people like me out of fear of political backlash or claims that the abortion care EMTALA [Emergency Medical Treatment and Labor Act] requires is prohibited by state law.” Although the Biden administration “made clear that the law requires hospitals to treat pregnant people who need emergency abortion care,” hospitals “have continued to deny care, and some health care professionals have fled states with restrictive abortion laws, worsening maternal health care deserts and undoubtedly contributing to our country’s maternal mortality crisis.” Farmer. “Opinion: I was denied a life-saving abortion at two hospitals. Here’s what I think of the Supreme Court decision.”

^{lxvii} Potter’s Syndrome means a fetus does not have functioning kidneys. Thus, they are unable to produce the amniotic fluid that allows their lungs to expand and cushion their growing body. Babies who survive until birth usually have contracted limbs, club feet, and flattened features from being compressed against the uterus wall. Frances Stead Sellers, Thomas Simonetti, and Maggie Penman. “The short life of Baby Milo.” Washington Post, May 19, 2023 (<https://www.washingtonpost.com/health/interactive/2023/florida-abortion-law-deborah-dorbert/>).

^{lxviii} In July 2022, Florida banned abortions after 15 weeks, with exceptions if the fetus had a fatal abnormality or if the mother was “at risk of death or substantial or irreversible physical impairment.” The exceptions required “written certification from two physicians.” Although it seems that Deborah’s pregnancy should have fallen under the fatal fetal abnormality exception, Deborah said “the hospital affiliated with her maternal-fetal medicine specialist would not induce birth early, citing state law.” Katie Kindelan. “Woman says she battles trauma, depression 1 year after not receiving abortion care under Florida law.” ABC News, June 6, 2024 (<https://abcnews.go.com/GMA/Wellness/woman-battles-trauma-depression-1-year-after-receiving/story?id=110340530>). As of March 2025, Florida law now prohibits abortions after six weeks, and still requires two physicians to provide certification if an exception exists. An exception to save the pregnant woman’s life or avoid serious risk of “substantial and irreversible physical impairment of a major bodily function” does not apply for psychological conditions. Additionally, the exception for rape and incest only apply up to 15 weeks of gestation and requires the woman to bring documentation and “evidence” proving that she is a victim of rape or incest. Evidence includes a restraining order, police report, medical record, or other court order or documentation. Fla. Stat. section 390.0111(1)(a), (d).

^{lxix} Milo struggled to breathe for nearly two hours. Sellers, Simonetti, & Penman. “The short life of Baby Milo.”

^{lxx} *Id.*

^{lxxi} *Id.*

^{lxxii} CAT. Article 7 of the ICCPR.

^{lxxiii} “Every human being has the inherent right to life,” and “no one shall be arbitrarily deprived” of their life. ICCPR Art. 6. This right prohibits the “deprivation” of life due to a “deliberate or otherwise foreseeable and

preventable life-terminating harm or injury caused by an act or omission.” It also establishes the right to “enjoy a life with dignity.” General Comment No. 36 on article 6 of the ICCPR, on the right to life. Human Rights Committee. Paras. 6, 3

(https://www.ohchr.org/sites/default/files/Documents/HRBodies/CCPR/GCArticle6/GCArticle6_EN.pdf). Article 26 states that “all persons are equal before the law and are entitled” to “effective protection against discrimination on any ground,” including race or sex. The other grounds are color, language, religion, political or other opinion, national or social origin, property, birth or other status. ICCPR Art. 26.

^{lxxiv} The right to public health and medical care as a right must be guaranteed “without distinction as to race, color, or national or ethnic origin.” CERD. Art. 5(e)(iv). Additionally, under Art. 2(c), signatory States to CERD must “take effective measures to review governmental, national, and local policies” and “amend, rescind, or nullify any laws and regulations which have the effect of creating or perpetuating racial discrimination wherever it exists.”

^{lxxv} Donna L. Hoyert. “Maternal mortality rates in the United States, 2020.” CDC National Center for Health Statistics, 2022. <https://www.cdc.gov/nchs/data/hestat/maternal-mortality/2020/maternal-mortality-rates-2020.htm>.

^{lxxvi} *Id.*

^{lxxvii} Policy Center for Maternal Mental Health. “Maternal mortality in the U.S. declined, though disparities in the black population persist.” Feb. 7, 2025 (<https://policycentermmh.org/maternal-mortality-in-the-u-s-a-declining-trend-with-persistent-racial-disparities-in-the-black-population/>).

^{lxxviii} Although the maternal mortality rate in Texas rose from 17.2 in 2019 to 27.7 in 2020, “the highest numbers since Texas began tracking maternal deaths in 2013,” the Texas Maternal Mortality and Morbidity Review Committee (MMMRC) decided at the end of 2024 “not to review pregnancy-related deaths between 2022 and 2023—the period after Texas imposed a strict abortion ban.” Committee on Oversight and Government Reform. “Oversight Democrats demand briefing after Texas Maternal Mortality Committee abandons review of pregnancy-related deaths amid abortion ban.” Dec. 19, 2024 (<https://oversightdemocrats.house.gov/news/press-releases/oversight-democrats-demand-briefing-after-texas-maternal-mortality-committee>). See also Eleanor Klibanoff. “Maternal deaths surged in Texas in 2020, 2021.” The Texas Tribune, Sept. 18, 2024 (<https://www.texastribune.org/2024/09/18/maternal-mortality-2020-2021/>). Unfortunately, maternal mortality rates are “difficult or impossible” to accurately measure, due to inconsistent data, records not addressing abortion access, political interference, and small sample sizes, in addition to situations like Texas declining to review pregnancy-related deaths post-*Dobbs* and Idaho abandoning their state maternal mortality committee altogether. Kavitha Surana. “Maternal deaths are expected to rise under abortion bans, but the increase may be hard to measure.” July 27, 2023 (<https://www.propublica.org/article/tracking-maternal-deaths-under-abortion-bans>). See also Natalie Schachar. “As US maternal mortality rates surge, Idaho abandons panel investigating pregnancy-related deaths.” Idaho Capital Sun, June 30, 2023 (<https://idahocapitalsun.com/2023/06/30/as-us-maternal-mortality-rates-surge-idaho-abandons-panel-investigating-pregnancy-related-deaths/>). Idaho has since revived the committee as an advisory body to the State Board of Medicine. Georgia also dismissed all members on their maternal mortality committee in 2024 after “confidential information” was “inappropriately shared” with outside sources. The new committee members have not been named publicly. Amy Yurkanin. “Georgia won’t say who’s serving on its maternal mortality committee after dismissing all members last year.” ProPublica, Mar. 4, 2025 (<https://www.propublica.org/article/georgia-maternal-mortality-committee-members-names-not-released>). This refusal to monitor critical reproductive health outcomes represents a further violation.

^{lxxix} These numbers come from an analysis by the Gender Equity Policy Institute. Erika Edwards, Zinhe Essamuah and Jason Kane. “A dramatic rise in pregnant women dying in Texas after abortion ban.” NBC News, Sept. 20, 2024 (<https://www.nbcnews.com/health/womens-health/texas-abortion-ban-deaths-pregnant-women-sb8-analysis-rcna171631>).

^{lxxx} *Id.*

^{lxxxi} ICCPR Art. 6. Their ill-treatment and suffering leading up to their deaths also mean they were unable to live their life with “dignity.” General Comment No. 36 on article 6 of the ICCPR, on the right to life. Human Rights Committee. Para. 3

(https://www.ohchr.org/sites/default/files/Documents/HRBodies/CCPR/GCArticle6/GCArticle6_EN.pdf). See also Edwards, Essamuah, & Kane. “A dramatic rise in pregnant women dying in Texas after abortion ban.”

^{lxxxii} ICCPR, Art. 26; CERD, Art. 5(e)(iv). Restrictive state abortion bans also disproportionately impact women of low socioeconomic status, another potential violation of ICCPR Art. 26. The disproportionate impact on women of low socioeconomic status is further discussed in subsection iii.

^{lxxxiii} Medicaid is a federal program that provides health coverage to eligible low-income residents who would otherwise be uninsured. Centers for Medicare & Medicaid Services. “Medicaid.” Last accessed Mar. 21, 2025 (<https://www.medicaid.gov/medicaid>). In October 2024, more than 79 million Americans were enrolled in Medicaid. Centers for Medicare & Medicaid Services. “October 2024 Medicaid & CHIP Enrollment Data Highlights.” Last

accessed Mar. 21, 2025 (<https://www.medicaid.gov/medicaid/program-information/medicaid-and-chip-enrollment-data/report-highlights>).

Research shows that individuals enrolled in Medicaid “have substantially better access to care than people who are uninsured . . . and are less likely to postpone or go without needed care due to cost.” However, “gaps in access to certain providers is an ongoing challenge.” Alice Burns, Elizabeth Hinton, Robin Rudowitz, and Maiss Mohamed. “10 Things to Know about Medicaid.” KFF.org, Feb. 18, 2025 (<https://www.kff.org/medicaid/issue-brief/10-things-to-know-about-medicaid/>).

^{lxxxiv} See Public Law 117-103, Div. H. §§ 506-507, also known as the Hyde Amendment. The U.S. legislature passed the Hyde Amendment in 1977 as a backlash to *Roe* and banned the use of federal funds for providing abortions. There are exceptions for pregnancies that endanger the life of the pregnant woman, or that resulted from rape or incest. As of March 2024, nineteen states and the District of Columbia allow the Hyde Amendment to prevent women enrolled in Medicaid from accessing abortion. Alina Salganicoff, Laurie Sobel, and Amrutha Ramaswamy. “The Hyde Amendment and coverage for abortion services under Medicaid in the post-Roe era.” KFF.org, Mar. 14, 2024 (<https://www.kff.org/womens-health-policy/issue-brief/the-hyde-amendment-and-coverage-for-abortion-services-under-medicaid-in-the-post-roe-era/>). Although the Biden administration attempted to repeal or circumvent the Hyde Amendment, these efforts have been definitively reversed by the new Trump administration. U.S. Office of the Presidency. Executive Order on Enforcing the Hyde Amendment, Jan. 24, 2025 (<https://www.whitehouse.gov/presidential-actions/2025/01/enforcing-the-hyde-amendment/>).

^{lxxxv} Salganicoff, Sobel, & Ramaswamy. “The Hyde Amendment and coverage for abortion services under Medicaid in the post-*Roe* era.”

^{lxxxvi} *Id.*

^{lxxxvii} *Id.*

^{lxxxviii} “About half of Medicaid enrollees are Black or Hispanic.” Noah Weiland. “Research finds significant racial disparities in Medicaid re-enrollment.” NY Times, June 3, 2024 (<https://www.nytimes.com/2024/06/03/us/politics/medicaid-reenrollment-black-hispanic.html>).

^{lxxxix} Shaye Beverly Arnold. “Reproductive rights denied: the Hyde Amendment and access to abortion for Native American women using Indian health service facilities.” Am J Public Health. 2014 Oct; 104(10):1892-3 (<https://pmc.ncbi.nlm.nih.gov/articles/PMC4167108>). See also Salganicoff, Sobel, & Ramaswamy. “The Hyde Amendment and coverage for abortion services under Medicaid in the post-*Roe* era.”

^{xc} CERD, Art. 1; ICCPR Art. 26 prohibits discrimination “on any ground” including race, sex, “or other status.”

^{xci} Ethiopia recommended stepping up efforts to “improve the health, dignity, and well-being of women;” Finland recommended making “essential health services accessible to all women and girls;” France recommended ensuring “access by women and girls to sexual and reproductive rights and health;” Iceland recommended protecting “the sexual and reproductive health and rights of women and girls by ensuring their access to sexual and reproductive health information, commodities, and services;” Mexico recommended ensuring “access by all women to sexual and reproductive health information and services;” and Georgia recommended continuing “measures directed at the elimination of violence against women and girls.” A/HRC/46/15, Report of the Working Group on the Universal Periodic Review, United States of America. UN Human Rights Council forty-sixth session, February - March 2021. Para. 26.

^{xcii} A/HRC/46/15/Add.1. Report of the Working Group on the Universal Periodic Review, United States of America. Addendum: Views on conclusions and/or recommendations, voluntary commitments, and replies presented by the State under review. UN Human Rights Council forty-sixth session, February - March 2021. Para. 12.

^{xciii} According to its most recent update, the World Health Organization (WHO) reports that 117 countries allow abortion when the pregnancy threatens the life of the pregnant person, 76 countries allow abortion when there is a severe fetal abnormality, 70 countries allow abortion when the pregnant person was raped, and 49 countries allow abortion when the pregnancy resulted from incest. WHO and the UN. “Global Abortion Policies Database.” Last accessed Mar. 21, 2025 (<https://abortion-policies.srhr.org/>).