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The Honorable Douglas A. Collins
Secretary
Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, DC 20420

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

Submitted electronically via regulations.gov

RE: Reproductive Health Services

Dear Secretary Collins and Dr. Lieberman,

On behalf of the American Academy of Family Physicians (AAFP), which represents 128,300 family physicians and medical students across the country, we appreciate the opportunity to comment on the proposed rule on Reproductive Health Services [published](#) in the Federal Register on August 4, 2025.

The Department of Veterans Affairs (VA) is proposing to rescind the 2022 Reproductive Health Services [final rule](#) and reinstate the exclusion of abortion and abortion counseling from the VA medical benefits package and the Civilian Health and Medical Program of the Department of Veterans Affairs (CHAMPVA).

The AAFP urges the VA to withdraw this proposed rule and maintain current policy. We strongly [support](#) access to comprehensive pregnancy and reproductive health services and believe pregnancy and reproductive health services are essential to general health care and should be covered under all insurance plans.

Family physicians across the nation provide comprehensive, continuous, and patient-centered reproductive health services. These include contraceptive counseling and provision, pregnancy care, management of early pregnancy loss, abortion care where legally permitted, and preventive screenings. Family physicians serve diverse populations, including veterans, and are often the first point of contact for reproductive health needs. This proposed rule would severely limit their ability to provide essential care to patients who rely on the VA system. The proposed exclusion also raises concerns about its impact on the patient-physician relationship, a core element of effective and high-quality medical care. Family physicians are trained to engage in shared decision-making, where clinical recommendations

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are based on medical evidence and tailored to the individual needs and circumstances of each patient. By categorically excluding abortion and abortion counseling, this proposal impedes the ability of physicians to present the full range of medically appropriate options to their patients.

The proposed rule states that abortion services would remain available when a physician certifies that the life of the pregnant individual would be endangered if the pregnancy were carried to term. While this exception is important, we encourage the VA to allow physicians to exercise their clinical judgment across the full spectrum of patient health needs, rather than limiting their clinical decision-making to life-threatening circumstances.

Additionally, the proposed rule frames the 2022 policy change as a response to *Dobbs v. Jackson Women's Health Organization*, yet it does not address the implications of the Supreme Court's decision should this proposed rule be finalized. Specifically, the proposed rule fails to acknowledge that veterans in states with abortion bans may be denied access to medically necessary care in the absence of VA support. By omitting this context, the rule overlooks the VA's responsibility to ensure timely and appropriate treatment for all veterans, regardless of location. Accordingly, this proposal does not reflect current clinical practice or the diverse health needs of the veteran population. If finalized, patients may feel forced to seek care outside the VA system, disrupting continuity of care and creating avoidable, and potentially harmful, barriers to medically appropriate treatment. Such a policy risks compromising the trust, transparency, and quality of care veterans receive within the VA system.

We appreciate the opportunity to provide comments on this proposed rule. The AAFP stands ready to collaborate with the VA to ensure that its policies uphold the highest standards of clinical integrity and patient-centered care.

For additional questions, please contact Sahana Chakravarti, Regulatory Specialist, at schakravarti@aaafp.org.

Sincerely,

A handwritten signature in black ink that reads "Steve Furr, M.D., FAAFP".

Steven Furr, MD, FAAFP
American Academy of Physicians, Board Chair

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