



Financial Estimate Committee
Secretary of State Dennis Richardson
255 Capitol St. NE
Salem OR 97310

RE: Draft Estimate of Fiscal Impact for Initiative Petition 1

Dear Committee Members,

On behalf of NARAL Pro-Choice Oregon and Planned Parenthood Advocates of Oregon, we respectfully offer the following public comments in regard to the Financial Estimate Committee's Draft Statement of Fiscal Impact for Initiative Petition 1 (IP 1).

For decades, our organizations have fought to ensure that women and their families are supported in their personal health decisions, whether they choose to parent, plan an adoption, or seek an abortion. We work to ensure that everyone in Oregon is able to determine when and whether to become a parent. We know that Oregonians believe everyone should have access to reproductive healthcare no matter how much money you make or what kind of insurance you have.

We would also like for members of the Committee to note that this fiscal impact process does not include what we believe is the most important financial consideration of all: If passed, IP 1 would undermine a family's ability to make decisions that will provide for their future economic security and wellbeing.

Furthermore, we would like to share our significant concerns regarding the process, timeline and opportunity for feedback as outlined by the Secretary of State's Office. We feel strongly that this process has lacked thorough and adequate analysis due to data limitations and unclear correlations made between past and projected caseloads and other major cost factors. If the process had provided for adequate time and feedback from stakeholders, we would have welcomed the opportunity to consult nationally-recognized institutions for in-depth analysis and research. Unfortunately, neither of our organizations were approached during the drafting of this estimate, nor have we been privy to the necessary background and data referenced in the analysis in order to provide real, evidence-based stakeholder feedback.

While we have not been given the necessary information or time needed to accurately confirm or dispute the current estimates cited in the draft financial impact statement, we would like to provide the following feedback on several of the assumptions and considerations made in the current draft.

- The current drafted statement underestimates and does not accurately describe the full impact of the constitutional amendment. There are considerable mid-term and long-term impacts to state programs and services that are indeterminate but will be significant over time. The current estimate is a bare minimum and only addresses increased costs for labor and delivery but does not include other safety net programs that are vital to the immediate, mid- and long-term health and wellbeing of the parent and their families.



- The current estimate has not considered the administrative costs of implementation to the state or the impact passage of IP 1 may have on other healthcare providers such as county and tribal governments. Nor does it acknowledge the lack of obstetrical care in general, especially for people living in rural parts of the state. This measure would contribute to capacity challenges we already cannot seem to resolve as a state. This should be acknowledged in the statement.
- We are concerned the amount of federal matching funds may be overestimated. As you are aware, Federal matching funds are not new revenue to our state, but are funds intended to help offset increased costs. These funds often do not materialize in the same biennium as they are needed. In addition, there are several factors that may not have been considered in the federal match calculations, such as exceptions that are "medically necessary" that currently only consider the risk to the life and but not the health of pregnant individual. Certitude on risk of life can be elusive, however, risks to health are more in line with what is customarily considered "medically necessary." Those may include future fertility and other health concerns that go beyond ectopic pregnancy and could include fetal anomalies incompatible with life.
- We are also concerned that the current financial impact statement may be overestimated, as it assumes 100 percent of current funds allocated for abortion care through the Oregon Health Plan or other impacted plans administered by the Public Employee Benefits Board and Oregon Educators Benefits Board would be spent should IP 1 go into effect. It is crucial that voters know which state health plans will be impacted by IP 1. We urge committee members to clearly state which plans will be financially impacted by the passage of IP 1 and most importantly – which Oregonians will see their health coverage seriously impacted by the ballot measure.
- Voters should be informed that long-term workforce impacts of the measure due to pregnancy and family leave and other early childcare disruptions to parents in the workforce can further strain the safety-net system for years to come.
- Voters must be informed about the full potential impact to all state funded services programs and how a permanent change to Oregon's constitution like IP 1 may impact the state budget over time. In the current estimate, it is assumed only 25 percent* of state-funded abortions would go to term. While it is impossible to guess a family's decision given this scenario, any and all assumptions must be evenly applied. For a similar measure on the 1986 ballot, the drafters assumed that "100 percent of previous abortion cases would carry to term" and "factors such as the number of cases which may find private funding for abortion or abortions performed under the medical exception provision in the measure cannot be determined but may affect the eventual financial impact of this statement."

*At a minimum, the research cited for this estimate was only able to do analysis of five states. The range for those states was from 18-23% on the low end to 37% on the high end. It should be the duty of this committee to inform voters of the real potential costs and using the high-end estimate of the detailed state-based analysis better serves this obligation.

Thank you for the opportunity to offer public comment regarding the draft Fiscal Impact Statement.



Respectfully,

A handwritten signature in black ink that reads "Grayson Dempsey". The signature is written in a cursive style with a large, prominent "D" at the end.

Grayson Dempsey
Executive Director
NARAL Pro-Choice Oregon

A handwritten signature in black ink that reads "Emily McLain". The signature is written in a cursive style with a large, prominent "M" at the end.

Emily McLain
Executive Director
Planned Parenthood Advocates of Oregon

