July 6, 2018

American Board of Medical Specialties
353 North Clark Street
Suite 1400
Chicago, IL 60654

Re: Statement of Catherine Glenn Foster, M.A., J.D., President and CEO, Americans United for Life, Opposing the American Board of Obstetrics and Gynecology’s Request for a New Subspecialty Certification in Complex Family Planning

To the American Board of Medical Specialties:

Thank you for the opportunity to submit comments regarding the American Board of Obstetrics and Gynecology’s request for a new subspecialty certification in Complex Family Planning. My name is Catherine Glenn Foster, and I serve as President and CEO of Americans United for Life (AUL), the oldest and most active pro-life nonprofit advocacy organization. Based in the Washington D.C. area and founded in 1971, before the Supreme Court’s decision in Roe v. Wade, AUL has dedicated nearly 50 years to advocating for comprehensive legal protections for human life from conception to natural death.

I write to strongly oppose the creation and certification of a new subspecialty in Complex Family Planning because the certification is redundant and the training of physicians to kill fetuses in utero should have no place in medicine nor be approved by the ABMS.

First, there is no need for additional board certification in Complex Family Planning because many of the proposed skills are already covered by other residency and board certification options. For example, training in contraception, miscarriage management, and complicated pregnancy management is already done in an Obstetrician/Gynecologist residency and specialty certification.1 Training in management and complications of high-risk pregnancies is already accomplished through a Maternal and Fetal Medicine subspecialty board certification.2 And training in reproduction, infertility, and hormonal dysfunctions is already covered by the Reproductive Endocrinology/Infertility subspecialty board certification.3 Thus, there is no need for the ABMS to create a redundant certification in Complex Family Planning.

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2 Id. at 42.
3 Id.
Second, where the proposed Complex Family Planning certification is unique, it is training physicians to kill fetuses in utero—a practice that should have no place in the field of medicine or in the law, much less with the imprimatur of the ABMS.

Intentionally harming the unborn should have no place in medicine. The Hippocratic Oath, the basis of medical professional ethics and professional care of patients, imparts to the physician fiduciary responsibilities to act at all times in the best interests of his or her patient—which includes both the mother and the child in utero—while simultaneously forbidding acts that are intrinsically harmful to patients, including elective abortion. If the ABMS accepts the proposed certification for Complex Family Planning, it will not only be condoning, but demanding as a requirement for certification, the killing of countless unborn children.

Historically, American law has protected developing human life at the earliest point that there was sufficient medical evidence that a living human being existed. For example, in the 1790s, James Wilson, a signer of the Declaration of Independence and of the Constitution and one of the first Supreme Court Justices, wrote: “With consistency, beautiful and undeviating, human life, from its commencement to its close, is protected by the common law.” Protection of fetal human life (particularly at later stages, but also at earlier ones) remains embedded in American law. For instance, state laws protect unborn children in “multi-faceted ways . . . outside the context of abortion—in criminal law, tort law, health care law, property law and guardianship law.” The ABMS should likewise protect unborn children with the highest quality of expert care through its certification decisions.

Thus, the ABMS should reject the American Board of Obstetrics and Gynecology’s request for a new subspecialty certification in Complex Family Planning.

Sincerely,

Catherine Glenn Foster, M.A., J.D.
President and CEO
Americans United for Life

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4 Even the Supreme Court in Roe v. Wade recognized the enduring value of the Oath: “[The Hippocratic Oath] represents the apex of the development of strict ethical concepts in medicine, and its influence endures to this day. . . . [W]ith the end of antiquity . . . [t]he Oath ‘became the nucleus of all medical ethics’ and ‘was applauded as the embodiment of truth.’” 410 U.S. 113, 131–32 (1973).