

Abortion Policy on the Global Stage: Unpacking the Trump Administration's Newly Expanded Mexico City Policy

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KFF

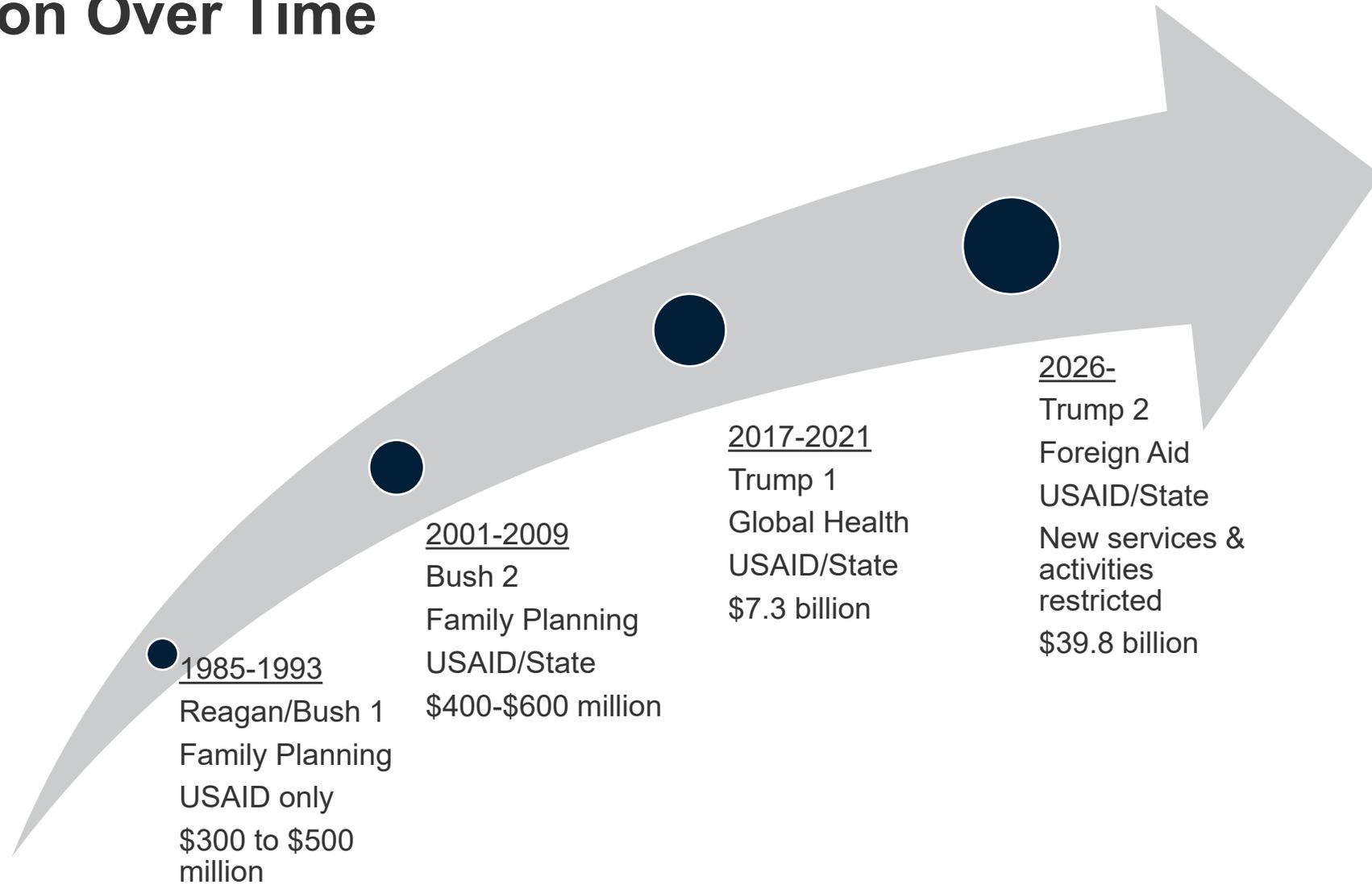
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Overview of the Policy

History of the Mexico City Policy (MCP)

- First announced in **1984** by the Reagan administration; **rescinded and reinstated** by subsequent administrations along party lines since.
- Has been in effect for **23 of past 42** years.
- When in effect, policy required foreign NGOs to certify that they **would not “perform or actively promote abortion as a method of family planning” using funds from any source** (including non-U.S. funds) as a condition of receiving U.S. government global family planning funding. Policy “flows down” to any sub-recipient.
- **Expanded over time:**
 - 2017: President Trump reinstated and significantly expanded to encompass vast majority of global health assistance; broad definition of financial support provided to sub-recipients.
 - 2025: President Trump reinstated and called for even broader expansion.
 - 2026: Three, separate, inter-related final rules - including MCP expansion - released under new, broader policy; marks greatest MCP expansion to date.

Expansion Over Time



Memorandum for the Secretary of State, the Secretary of Defense, the Secretary of Health and Human Services, the Administrator of the United States for International Development

The White House | January 24, 2025

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01/24/25

SUBJECT: The Mexico City Policy

I hereby revoke the Presidential Memorandum of January 28, 2021, for the Secretary of State, the Secretary of Defense, the Secretary of Health and Human Services, and the Administrator of the United States Agency for International Development (Protecting Women's Health at Home and Abroad), and reinstate the Presidential Memorandum of January 23, 2017, for the Secretary of State, the Secretary of Health and Human Services, and the Administrator of the United States Agency for International Development (The Mexico City Policy).

Three Final Rules: *Promoting Human Flourishing in Foreign Assistance* (PHFFA) – January 27, 2026

**“Protecting Life
in Foreign
Assistance”**

**“Combating
Discriminatory
Equity Ideology
in Foreign Assistance”**

**“Combating
Gender Ideology in
Foreign Assistance”**



FEDERAL REGISTER
The Daily Journal of the United States Government



Overview of New PHFFA Policy

- Three separate but related **final rules** released on January 27, 2026 (no comment period)
- Go into effect 30 days after rules published (February 26, 2026)
- **Umbrella policy** now called: *Promoting Human Flourishing in Foreign Assistance* (PHFFA):
 - “Protecting Life in Foreign Assistance”
 - “Combating Discriminatory Equity Ideology in Foreign Assistance”
 - “Combating Gender Ideology in Foreign Assistance”
- Expands MCP and applies new rules to **more funding, more organizations, additional services and activities**
- More **funding**: global health assistance → most non-military foreign assistance
- More **funding instruments**: grants/cooperative agreements → plus contracts
- More **organizations**: Foreign NGOs → plus U.S. NGOs, foreign governments, parastatals, international organizations (but different applications based on organization type)
- More **restrictions**: Abortion → plus DEI, and gender affirming care and related activities/services, defines sex as “person's immutable biological classification as either male or female”

How Policy Operates

- Applies to **all new awards** or **new funding** in existing award.
- Recipient has to agree to all three policies; restrictions on **providing** and **promoting** prohibited activities.
- Recipient has to “**flow down**” policies to any sub-recipient (including when providing non-federal support)
 - Exception for U.S. NGOs – agree to segregate U.S. funds (physical/financial separation) from other funding for “promoting” but cannot “provide” with any source. Required to flow-down but not subject to same limitation on “financial support” with non-USG funds.
 - Exception for foreign governments/parastatals – may be required to agree to policies; would need to segregate U.S. funds from other funding.
- **Waiver** at Secretary or Under Secretary of State for Foreign Assistance, Humanitarian Affairs, and Religious Freedom’s discretion (waiver guidance to be developed).
- **Conflict with local laws**: exemption from Secretary of State may be sought
- **Compliance/Enforcement**:
 - Recipient has to agree to allow authorized USG representatives to inspect or observe activities at any time.
 - If found to be in violation, award is terminated; may be required to pay back; other corrective actions may be used.

What is Known About Impacts of the Mexico City Policy: Findings from a Literature Review

Literature Review Scope

- Searched literature from 2001 to the present.
- Identified 71 studies/documents for inclusion.
- Variety of methodological approaches used (some studies used more than one method): qualitative (48); quantitative (27); scoping/literature reviews (7).
- By Presidential administration: Trump (45), George W. Bush (31); George H.W. Bush (10); Reagan (9). Studies also used the Obama (15), Clinton (13), and Biden (4) administration periods as comparisons.
- Geographic Scope: multi-country (29); single-country (29); no specific geographical focus (13).
- Twenty-nine studies were peer reviewed analyses, 38 were independent or organizational studies, and four were U.S. government-issued reports.

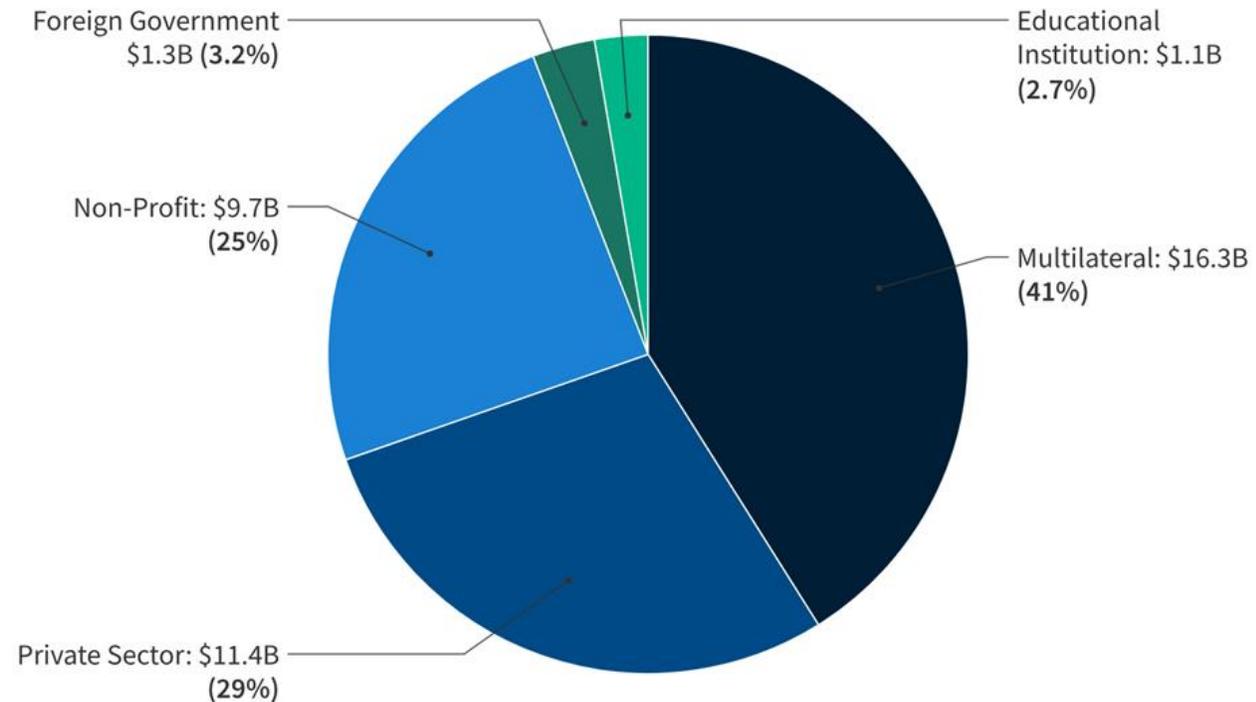
Findings: Impacts Associated with Policy

- Increased abortion rates
- Increased pregnancy
- Decreased contraceptive prevalence
- Disruption in family planning and other services
- Gaps in family planning and other services
- Reduced service integration
- Over-implementation and chilling effect
- Confusion
- Loss of civil society/NGO coordination and partnerships
- Increased administrative burden

Funding Analysis

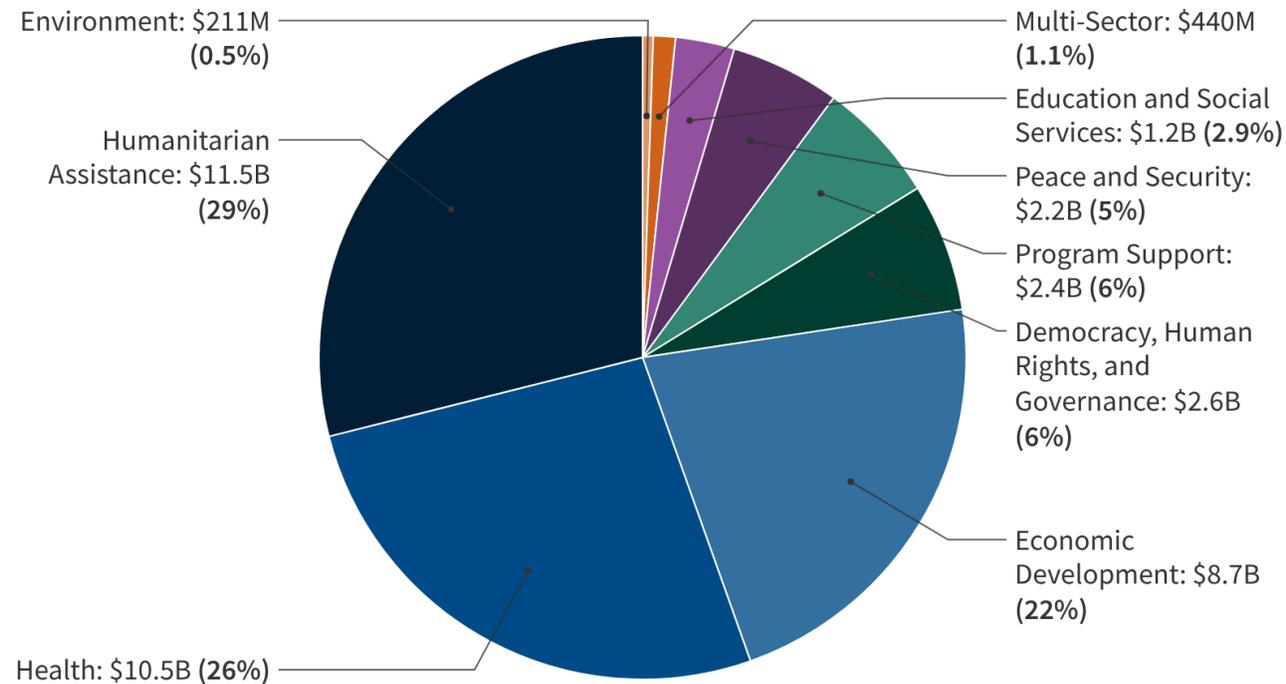
U.S. Foreign Aid Funding Subject to the Latest Mexico City Policy Expansion, by Recipient Type, FY 2024

Total Funding: \$39.8 billion



U.S. Foreign Aid Funding Subject to the Latest Mexico City Policy Expansion, Share by Sector, FY 2024

Total Funding: \$39.8 billion



Funding Newly Subject Under the Latest Expansion of the MCP

By Recipient Type:

- Multilateral organizations: \$16.3 billion
- Foreign governments: \$1.3 billion
- U.S. NGOs: \$16.5 billion
- Foreign NGOs: \$3.5 billion in non-health sectors

By Sector:

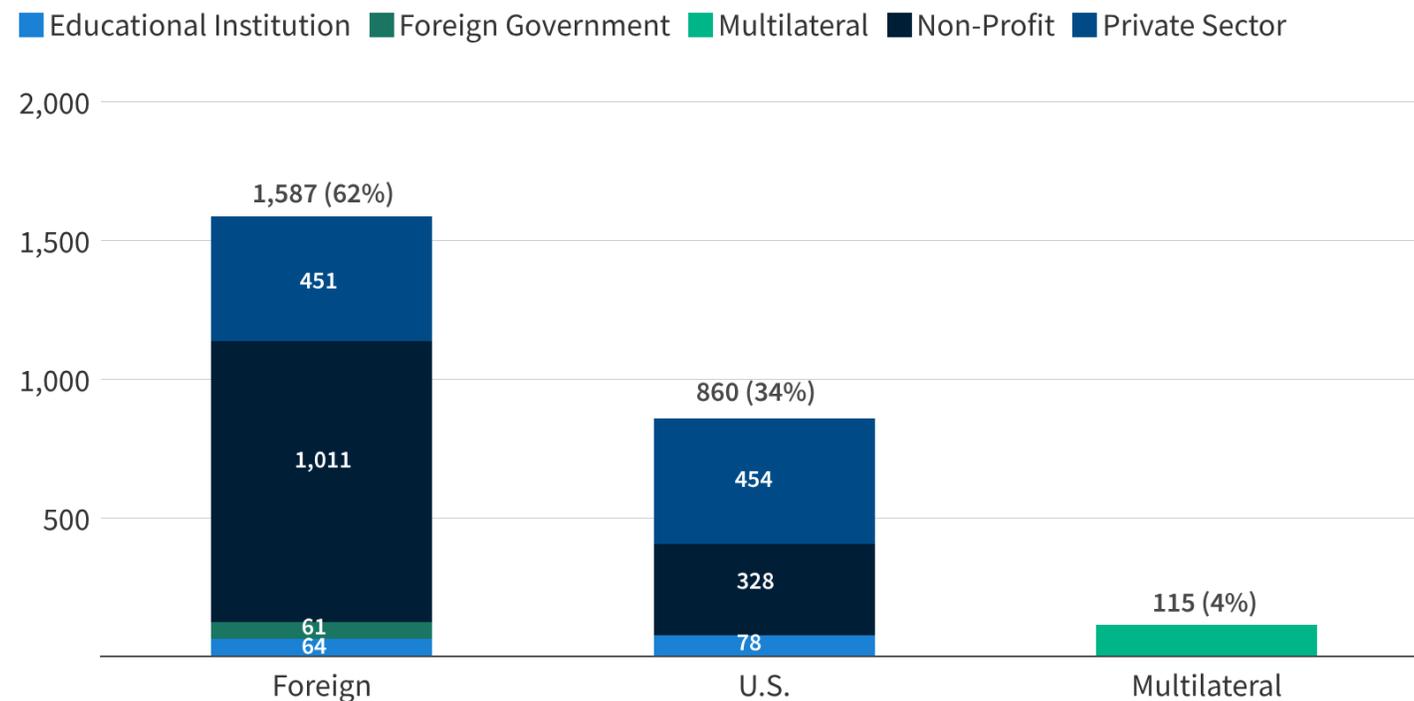
- **Non-health sectors:** \$29.2 billion, including:

- Humanitarian assistance: \$11.5 billion
- Economic development: \$8.7 billion
- Democracy, human rights, and governance: \$2.6 billion
- Peace and security: \$2.2 billion
- Education and social services: \$1.2 billion

- **Health sector:** \$8.3 billion in U.S. NGO,[^] multilateral, and foreign government funding

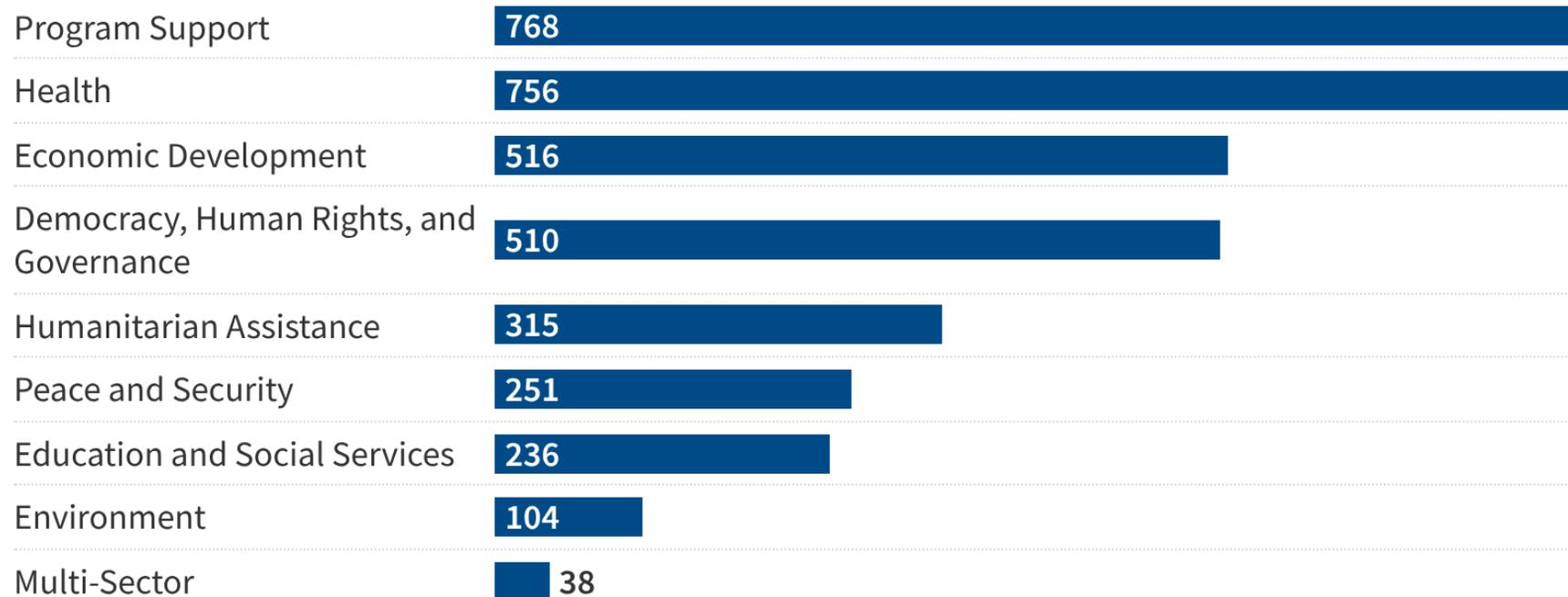
Number of Recipients Subject to the Latest Mexico City Policy Expansion, by Recipient Type, FY 2024

Total Number of Recipients: 2,562



Number of Recipients Subject to the Latest Mexico City Policy Expansion, by Sector, FY 2024

Total Number of Recipients: 2,562



What to Watch

- Application to more departments/agencies (intent to expand)
- Application to contracts (rule-making expected)
- Waiver guidance and process (to be developed)
- How will this affect/intersect with the America First Global Health Strategy MOUs
- How different sectors and organizations will respond
- Legal challenges
- Impact on services and people

Questions?

THANK YOU

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