

December 19, 2025

New York City Department of Health and Mental Hygiene Gotham Center
42-09 28th Street, 14th Floor, CN 30
Long Island City, NY 11101-4132

RE: Proposed Amendment to Articles 203 of the New York City Health Code

Dear Office of the General Counsel,

Planned Parenthood of Greater New York (PPGNY) is grateful for the opportunity to express our strong support for proposed amendments to Articles 203 of the New York City Health Code. The amendments would align the city's health code with recent legislative changes to Article 41 of the New York State Public Health Law regarding reporting pregnancy loss and induced terminations of pregnancy.

PPGNY is a trusted provider of sexual and reproductive health care and education programs for communities throughout New York City. In 2024, we conducted over 74,000 patient visits through our virtual health center and at our NYC health centers, providing care to all regardless of immigration status, identity, or ability to pay for services. PPGNY proudly provides a range of health care services including general gynecological care, STI testing and treatment, and care for the LGBTQIA+ community, and abortion care. We also have robust community engagement and education programs that work to connect the most vulnerable communities throughout the city to services available at our centers.

We are thankful for New York City's foresight and leadership when in 2024, the city updated its tissue disposal reporting requirements to be more patient-centered before the rest of the state. This year, the state went further by eliminating abortion reporting altogether unless the patient requests disposition of products of conception, where reporting would still be required to facilitate that process. This amendment would require New York City to do the same. Collecting and holding this information puts patients, as well as providers, at risk for surveillance, criminalization and stigmatization by hostile actors. These regulatory changes will further safeguard private information related to the provision of abortion care from hostile actors and eliminate outdated policies placing undue burden on the providers delivering this critical care. We also support the adoption of the broader term "pregnancy loss" to replace "fetal death" to define the event described as "termination of pregnancy".

We are deeply committed to providing care, no matter what. And over the years, we have weathered many attempts to severely restrict sexual and reproductive health care, including abortion care. With a hostile federal government towards reproductive health, it is necessary for New York City to do everything in its power to protect New Yorkers by updating its regulations to match progressive and updated policies. New York City must continue to be the beacon of safety both New Yorkers and those across the country, rely on.

We would also like to recommend introducing all gender-neutral language in this amendment. Moving away from the word “women” and using “person” instead. This change will ensure inclusion of transgender folks who may experience pregnancy loss or abortion.

We are very thankful to the Department of Health and Mental Hygiene (DOHMH) who tirelessly fights for all New Yorkers and are champions for sexual and reproductive health care access. Again, PPGNY supports the proposed amendment to Articles 203 of the New York City Health Code and appreciates the opportunity to submit comments to DOHMH.

Thank you for your advocacy and commitment to sexual and reproductive health. I hope we can continue working together to provide the quality, essential and lifesaving health care that New Yorkers need and deserve.