

Abortion Rights: Maintaining the Separation of Church and State

Abstract:

With the recent overturning of the Supreme Court Case Roe V. Wade, abortion care parameters are now left up to each individual state. The vote was 5-4 with the following justices voting to overturn it: Associate Justice Samuel J. Alito Jr, Associate Justice Clarence Thomas, Associate Justice Neil M. Gorsuch, Associate Justice Brett M. Kavanaugh, and Associate Justice Amy Coney Barrett. This decision will lead to disproportionate effects in reproductive healthcare for vulnerable populations such as the LGBTQIA+ community and women of color. Abortion has long been a highly politicized topic and is often tied to religious beliefs. It is critical now more than ever to examine how the separation of church and state is implemented into laws including the role of Christianity. Additionally, it is important to examine the makeup of the Supreme Court as a majority of the Justices are religious, which has an impact on their rulings.

Intro:

In 1973, the Supreme Court decided to challenge a Texas statute that made it a crime to perform an abortion unless a woman's life was at stake ("Planned Parenthood", 2014). June 24, 2022, will forever be known in history as the day when the Supreme Court case Roe. V. Wade was overturned and subsequently the right to access safe abortion care. Some states tried to pass legislation banning abortions past certain gestational age restraints or only allowing them in certain circumstances. According to the Guttmacher Institute, "26 states are certain or likely to move quickly to ban abortion [...] Of those 26 states, 13 have laws in place that are designed to be "triggered" and take effect automatically or by quick state action if Roe no longer applies- Arkansas, Idaho, Kentucky, Louisiana, Mississippi, Missouri, North Dakota, Oklahoma, South Dakota, Tennessee, Texas, Utah, and Wyoming" ("13 States", 2022). This poses a concern about

the state's role in a person's autonomy over their healthcare. A person's right to bodily integrity and medical decision-making is often overlooked for the fetus's rights. This is problematic as now there are medical review boards making decisions about a person's medical care based on the fetus's life instead of what's in the best interest of the person who is pregnant. Part of this is due in part to one's own Christian beliefs that lead people in government (local/state/federal) to pass policies that align with their religious beliefs. Yet, this is done under the assumption that everyone in the U.S. shares those beliefs. Our country is supposed to function on the premise of the separation of church and state. These lines get blurred when creating policies regarding issues like abortion. Healthcare professionals take an oath to do no harm but are now being put in a position where they are forced to make medical decisions based on complicated state policies instead of what's in the best interest of a patient's life. It especially becomes difficult if a hospital is a religiously-affiliated hospital. According to the article " "My Hands Are Tied": Abortion Restrictions and Providers' Experiences in Religious and Nonreligious Healthcare Systems", 2019) " In Catholic hospitals, providers are governed by the Ethical and Religious Directives for Catholic Health Care Services (ERDs), drafted by the U.S. Conference of Catholic Bishops. The ERDs prohibit abortion and restrict options for miscarriage management and other pregnancy-related complications" (Hasslebacher, 2020). Additionally, the Christian nationalism cultural framework will be examined to offer insight into the current and future impacts on society. Protecting abortion rights is essential to the separation of church and state not only in law but also in the medical field.

Law

First, it is important to examine the First Amendment as it is the amendment that entails the separation of church and state. The First Amendment states that no law can be made that

attempts to establish a certain religion or prohibits the practice of any other religion. There have been multiple attempts to pass legislation that loosely applies the first amendment. The cases: *Everson V. Board of Education of Ewing Township* and *Illinois ex rel. McCollum V. Board of Education of Champaign* set a precedent of a strict separatist application. This included the banishing of voluntary state-sanctioned prayer for public schools and extra-curricular events like football games and commencement exercises (Prud'homme, 2022, pp. 2). Specifically within *the Everson V. Board of Education of Ewing Township*, the case was attempting to get funding directed toward private schools in order to reimburse those who traveled to them. The ruling was based on the establishment of a religious clause that is a part of the First Amendment. This clause means: no government can set up a church or pass laws that aid or show a preference for one or all religions. As well as one cannot force someone to go to or stay away from church against one's will. A person cannot be forced or influenced to share certain beliefs in any religion, and no one can be punished for professing said beliefs or disbeliefs, including church attendance and non-attendance. These clauses can sometimes conflict, which is why the Supreme Court is involved in determining the best ruling.

In the past twenty years, a strict separatist view has been challenged by cases like the *Town of Greece v. Galloway* in 2014. In this court case, an accommodation/originalist approach was taken. Accommodation is an approach to the separation of church and state in which there is government acknowledgment of and perhaps support for religion. This particular approach has led to the Supreme Court allowing prayer before city government meetings and was conditional on the premise that the opportunity to lead prayers was open to all religious leaders of those in the community (Prud'homme, 2022, pp. 2). This ruling shows a compromise made for allowing prayer at these government meetings but made it clear it couldn't be closed off to a certain type

of religious prayer. Another example would be the Supreme Court's concern with the religion clause in the case of *Reynolds v. United States*. This case brought about the question of whether a statute in the U.S. that made polygamy illegal could be constitutionally applied to a Mormon (Kurland, 2022, pp. 6). Reynold was requesting the court to find him not guilty since he "was married ... in pursuance of and in conformity with what he believed at the time to be a religious duty" (Kurland, 2022, pp. 6). The judge, in this case, declared that since he deliberately married a second time knowing it was illegal and chose to act out of the influence of his religious beliefs of it being right, it did not exclude him from criminal liability. When it comes to abortion laws, they tend to be heavily influenced by Christian beliefs.

The Supreme Court as an institution does not have a definitive policy on how to apply a neutral interpretation of the Constitution in religious matters. Therefore, it leads to the judges making biased decisions. The U.S. Supreme Court has had sixteen Catholic Judges. This is significant because it describes the lack of religious diversity on the Supreme Court. As well as describing the trends one can observe in the rulings for more approval for government-sponsored religious monuments and government employees' prayer, and approval for institutions to fire and/or discriminate against their employees' conduct (Griffin, 20, pp. 171). This is problematic as the Supreme Court is meant to be composed of people from various backgrounds and having too many people from one religious background (Christianity) can lead to biased rulings. Ultimately, some judges have specific Catholic ideologies who are utilizing their privilege in their roles as justices to meet their agendas.

With the recent overturning of *Roe V. Wade*, it is important to examine how the judges came to the conclusion they did and the impact it will have on society. When *Roe V. Wade* was originally set as a precedent in 1973, it was done so on the basis that the constitutional right to

privacy was broad enough to encompass a right to choose abortion until the fetus' viability (Ziegler, 2022, pp. 16). However, in June 2022, judges on the Supreme Court concluded that there was no real protection for the right to an abortion in the constitution. The Supreme Court justices voted 5-4 to overturn *Roe V. Wade* and the reasoning given was "the constitution does not prohibit the citizens of each state from regulating or prohibiting abortion" (Whyte, 2022). The five justices that voted to end *Roe V. Wade* were: Associate Justice Samuel J. Alito Jr, Associate Justice Clarence Thomas, Associate Justice Neil M. Gorsuch, Associate Justice Brett M. Kavanaugh, and Associate Justice Amy Coney Barrett. All five of these justices are Catholic and have typically sided with cases protecting Christian ideals. That means 2/3 of the judges in the Supreme Court are Catholic, which represents a lack of diverse beliefs among the judges. This is significant because the Supreme Court is supposed to be a non-biased representative of the U.S. people, yet historically decisions have been made utilizing the basis of one's personal beliefs and using the "law" to hide those intentions. The Supreme Court has also been known to be dominated by Protestant Judges before the recent Catholic majority within the last decade. It has been made up of a majority of Catholic justices since the 1990s (Smith, 2022).

Associate Justice Samuel J. Alito Jr. has a history of work that has included religious and moral issues. He is known to have written the majority opinion in the 2014 *Burwell V. Hobby Lobby case* (Jones, 2022). This opinion expressed disagreement with the Obama administration's mandate for companies to cover the cost of contraceptives within employee health plans (Jones, 2022). This mandate included coverage of drugs that could induce abortion. He is also known to have written a dissent for the 2015 *Obergefel v. Hodges case*. This case was the Supreme Court holding that the Constitution guarantees the right to same-sex marriage. In 2017, he gave a speech to the graduating class of St. Charles Borromeo Seminary in Philadelphia emphasizing

the importance of religious freedom and describing his perceived future challenges (Jones, 2022). Justice Alito's more traditional views around same-sex marriage and religion raise a concern with the way he approaches cases in the Supreme Court.

The next justice who voted to overturn *Roe V. Wade* was Associate Justice Clarence Thomas. To him, abortion is considered to be modern eugenics. He has been known to hold other strong beliefs rooted in Christianity. In 2019, he made an argument in the case of *Box V. Planned Parenthood* in which the case addressed an Indiana ban on abortion based on race, sex, or disability of the unborn child (Jones, 2022). Justice Thomas believed the founder of Planned Parenthood was promoting birth control and not abortion with the purpose of "reducing the ever-increasing number of human beings who shouldn't have ever been born" (Jones, 2022). As well as saying that past Supreme Court decisions gave legitimacy and power to the eugenics movement. According to Thomas, prenatal screenings and other technologies mean that "abortion can easily be used to eliminate children with unwanted characteristics" (Jones, 2020). his biased belief shows that he has a very narrow view of the purpose of preventative care that Planned Parenthood offers. The point is to ensure women and other people who can be pregnant have access to care that would allow them to get tests to see if their baby has any conditions to be aware of. To make a blanket statement that an abortion service is being performed to get rid of less desirable fetuses is just incorrect. His rulings on abortion cases are based on his own belief that "all children are children of God".

Associate Justice Neil M. Gorsuch was nominated by President Donald Trump and took the place of Justice Antonin Scalia who died in 2016. Justice Gorsuch is known to have said that Federal judges should not impose their views on the laws as written. However, the way he has ruled in past cases proves otherwise. Justice Gorsuch studied law with a focus on natural law. He

was a co-author of the 1992 *Planned Parenthood V. Casey* decision as mentioned above. Gorsuch believes that it should be left up to the states to decide on abortion laws and how they should handle the issue. This is dangerous as it allows states to put massive restrictions on abortion access and care. He also is known for siding with *Bostock V. Clayton County* which was a ruling where the court ruled that sexual orientation and gender identity were a part of sex discrimination via Title IX. Ironically, he would side with this case as one could argue that abortion rights are sex discrimination in practice. It has long been a control over who has children. Particularly, women of color have been the most disproportionately affected group by limited resources offered to them and forced sterilizations.

The next Judge is Associate Justice Brett M. Kavanaugh. Kavanaugh is Catholic and regularly talks about his commitment to Catholicism. President Donald Trump appointed him to fill the seat of Justice Kennedy in 2018. He believes that a judge must be independent and must interpret the law as it was written. This is known as a more originalist view in the sense that he interprets the Constitution strictly and if something isn't specifically addressed, he believes that it is not their place to interpret a decision as if it was. Yet, our country is not the same as it was back then and so it is the purpose of the Supreme Court justices to interpret the Constitution for the problems of today within society and the current environment. However, he has been known to let his own beliefs about abortion affect how he votes. Justice Kavanaugh dissented in a decision in the case of *Garza v. Hargan*, which was when an undocumented pregnant teenager in federal custody was prevented from receiving an abortion. He felt this was an out-of-line ruling and thought they should have upheld parental consent laws where some states require parental consent before an abortion. To Kavanaugh, abortion is not a moral issue, yet it is. It's not mentioned in the Constitution, but there are so many other topics left out as well. He has also

been known to side with cases upholding the right to pray at football games or within public school settings. Public schools are meant to be neutral, and it seems that Kavanaugh's view is not in line with the separation of church and state.

The last judge is Associate Justice Amy Coney Barrett, who was nominated by President Trump in 2020. She replaced Justice Ruth Bader Ginsburg. She is a part of the Catholic group known as People of Praise. She operates under an originalist view and is known to have said, "I interpret the Constitution as a law... and that I interpret its text as text, and I understand it to have the meaning that it had at the time people ratified it. So that meaning doesn't change over time and it's not up to me to update it or infuse my policy views into it" (Jones, 2020). Her approach essentially would mean women wouldn't have the rights they do today since she doesn't believe in updating the Constitution. She is known to say that a judge must separate their beliefs from their rulings yet has also been known to mention that she believes Catholics should recuse themselves on cases involving capital punishment as the Church's teachings on the death penalty would require this. That is an example of how one would be letting religion get in the way of a fair trial as they are recusing themselves based on the beliefs of a church. She doesn't believe that parenthood and pregnancy share the same level of burden, yet this doesn't take into account the disparities women face. She asks in deliberation on *Roe v. Wade* why Safe Haven Laws don't cover the issue of the burden of motherhood and why adoption can't be utilized more instead of regulating abortion when the Supreme Court justices are deliberating, why Safe Haven Laws don't cover the issue of the burden of motherhood and why adoption can't be utilized more instead of regulating abortion. She has seven kids as well as two adopted kids from Haiti. She is letting her own beliefs about family cloud her ability to understand the lack of access to healthcare for many people that fall pregnant.

Some recent cases have been decided to have sided with religion, in particular, Christianity. In one case, the justices decided that a former Christian public school coach had the right to pray on football fields after games. In a 6-3 ruling it was determined that both the free exercise and free speech clauses of the First Amendment protect the coach's actions. However, following this ruling three of the justices (Stephen Breyer, Elena Kagan, and Justice Sonia Sotomayor) dissented from this decision. Justice Sonia Sotomayor claimed that the court, “consistently has recognized that school officials leading prayer is constitutionally impermissible” and said the ruling did a “disservice” to schools, students, and “the nation's longstanding commitment to the separation of church and state.” This is concerning as the Justices appear to not be able to separate one’s ideals that are influenced by Christianity from the decisions they make. In addition, the evidence given as to why the ruling was given was based on misconstrued evidence. It was argued in court that the coach was praying privately and quietly. Yet, the record reveals the coach has a history of praying with his team after past football games (Williams, 2022). In addition, the court recently ruled that Maine had engaged in religious discrimination when it refused to extend tuition aid to students to attend private Christian schools in the state provides it to similar schools (Abcarian, 2022). This brings up concerns with the viability of the Supreme Court as it appears some judges used their position of power to pass the ruling that benefited them and their own beliefs. Especially, when deciding the rights of a person’s body while pregnant and the majority of Judges voting on the issue are men.

With the overturning of *Roe V. Wade*, many states have passed legislation criminalizing either those that receive abortions or those who assist like healthcare professionals. These laws often use vague language on purpose to create uncertainty in what would be allowed care given to someone and what could lead a healthcare professional to be charged. Before *Roe V. Wade*

was set as a precedent in the U.S., women were arrested for having abortions and it was quite common for the abortion provider to be arrested for having performed an illegal abortion as well.

Medical Field

When it comes to healthcare, it is critical to understand the impact religious-affiliated hospitals have on the types of policies and procedures implemented. One in every five hospital beds in the United States is run by religious-affiliated hospitals and almost $\frac{3}{4}$ are in Catholic-managed hospitals. To examine the impacts of religion on the implication of health policies it is necessary to focus on a specific denomination: Catholicism. Catholic systems currently control around 1 in 6 U.S. hospital beds (Sellers & Venkataramanan, 2022). Catholic Hospitals utilize health directives that are drafted by the U.S. Conference of Catholic Bishops the Ethical and Religious Directives for Catholic Health Care Services (ERDs), drafted by the U.S. Conference of Catholic Bishops. Pope Pius XI has been known to summarize the Church as a guide for hospitals which includes the preservation of mother and child unless a medical action taken directly leads to the death of the unborn child even if the goal is to save the mother's life. In the Catholic tradition, an unborn fetus is considered to be "an unborn child", and thus they believe it is fully human and deserves dignity and respect (Di Camillio, 2022). Their views contradict each other as they say both the mother and child are precious, and then say a mother is conditional on the child's life. This being said, there is a permissible situation in which a medical intervention for a mother's condition may unintentionally result in the death of the unborn child. This could include, when a woman is diagnosed with an aggressive form of cancer, for example, uterine cancer, and the medical intervention needed for treatment is the removal of the uterus (hysterectomy). This would be an incredibly hard decision to have to make as it results in the death of the fetus.

Catholic teaching as well as ERDs give clear guidance on post-viability delivery by induction or cesarean section, in which both the health of mother and child can be preserved. However, there is uncertainty for labor before viability. Medical conditions that can threaten a woman's life include "pre-eclampsia, HELP (hemolysis, elevated liver enzymes, and low platelet count) syndrome, or chorioamnionitis (intrauterine infection) following preterm premature rupture of membranes (PPROM)" (Di Camillio, 2020). The recommended course of treatment for these conditions is the appropriate medications with close monitoring, but if this does not help then this would fall under a proportionate medical reason for a post-viability induction. The ERDs do not offer specific criteria though for what constitutes a proportionate medical reason. When there is no medical confirmation of a fetus dying, the National Catholic Bioethics Center (NCBC) maintains three points. The first is surgical abortion procedures of any kind are not permitted, this includes dilation and curettage or dilation and extraction. The second is that pre-viable induction of labor is not legitimate for underlying conditions, such as pulmonary hypertension or cardiomyopathy. Lastly, the third point is that pre-viable induction of labor is permissible only to expel pathological tissue from the uterus like in the case of chorioamnionitis or pre-eclampsia. This is because this would be directly intended removal of pathological tissue that is threatening the mother's life and not a direct abortion (Di Camillo, 2020). It's interesting how they use the term surgical abortion as not being allowed as it could be the necessary action taken to ensure the mother's health. Catholic doctrine holds that abortion is the direct removal of the fetus, yet one could argue a direct abortion would be what happens when one has cancer, gets their uterus removed, and subsequently the fetus.

Furthermore, there is guidance given for miscarriages and ectopic pregnancies. For miscarriages, it is allowed to remove an unborn child's remains through a surgical procedure if

they died in utero. The surgical procedure used would likely be a dilation and curettage, which is used for elective abortions on living children. The distinction made between this form of procedure and that that is used for elective abortion is that it would not be considered a direct abortion when the child has already died. In regard to ectopic pregnancies, there are four treatment guidelines set. The preferred treatment would be expectant waiting, which is essentially waiting for the ectopic pregnancy to resolve itself on its own. However, in ectopic pregnancies, the condition can become severe if the growing fertilized egg causes bleeding in the tissue. If the condition is in one's fallopian tube, the fertilized egg can cause the tube to rupture which results in bleeding within the abdomen and other life-threatening symptoms. The second treatment that can be permissible is a salpingectomy, which is the partial or full removal of the damaged fallopian tube. This is permissible as it's removing a mother's tissues and does not directly target the living implanted embryo. A third is a salpingostomy which is the directly intended removal of the living implanted embryo through a typically destructive surgical procedure and therefore not permissible. The last treatment is the use of a drug known as methotrexate (MTX) which is a cancer drug intended to dislodge the embryo from the site of implantation. This drug can be permissible if there is moral certitude of embryonic demise(death). If this certitude is not certain, the user would then not be permitted since it directly kills the embryo by attacking its cells (Di Camillo, 2022, pp. 2). 90% of ectopic pregnancies occur within one's fallopian tube and as the pregnancy grows, it leads to a rupture of the tube(ACOG). Tubal rupture is common with as many as 16% of tubal ectopic pregnancies, in which symptoms could occur around six weeks of gestational age (Stemick et al, 2019). Ectopic Pregnancy is the number one leading cause of maternal mortality in the first trimester. It should be noted that this kind of pregnancy is not viable and cannot be moved to the uterus. An issue

posed with the treatment of their type of pregnancy is the determination of if the death of the fetus is the intention, not a foreseen thing. Yet, the demise of the fetus is foreseen as the fetus cannot remain where it is located and be viable.

It appears that the guidelines being given are trying to reason through the need for an abortion which is problematic in healthcare. To provide effective healthcare, you need to be able to understand what your hospital's guidelines are as well as not be afraid to do what's necessary to save a patient life. An example of how a physician went about a patient's treatment is via the Ethics Review Board. A woman presented with PROM (preterm premature rupture of membranes), and herself and her family was worried for her life. There were many meetings held with the ethics review board to determine if necessary, the fetus would need to be removed. The physician described the experience as "feeling like we were fighting for our patient's life" (Di Camillo, 2020). One may argue that for other procedures, one needs approval before doing it like chemotherapy for cancer. However, when getting approval from a board on what's best for a patient the approval can be more harmful than helpful.

A national survey conducted found that, "22% of U.S. obstetrician-gynecologists primarily practice in religiously affiliated institutions and that 37% felt conflicted with their institution's religiously based policies for patient care" (Hassekbacher, 2020). Within Catholic Hospitals, a theory known as the double effect is often used to allow otherwise prohibited treatments that provide a legitimate or proportionate benefit. One case described by a healthcare professional described, "there was still a heartbeat on a 10-week fetus, we would not be allowed to intervene and medically treat [the patient with a dilation and curettage], which would help stop her bleeding...or we [would have] to get an ethics consult, which was calling the priest in the middle of the night to explain your case and get a blessing." (pp. 109). Healthcare professionals

should be able to treat their patients without having to constantly consider if an ethics board is needed. It creates an unnecessary level of stress for healthcare workers as they have to ensure the actions, they take are in line with the policies implemented. In addition, healthcare professionals are having to refer patients out to get them access to the procedures they need. With an increasingly large number of hospitals being Catholic or of Christian affiliation, it creates a massive disparity in access to healthcare. Referrals assume that there is another hospital or facility that is not religiously affiliated that can help the patient. This can leave healthcare providers in a tough spot if they give care to a patient that's against hospital policy or attempt to refer them to the nearest hospital. When a person needs medical care, they aren't looking at what affiliation a hospital is or even how the affiliation could affect the care they receive. They are sick or in distress. However, that's what women are having to do since "more than 80% of U.S. women feel that it is important to know about a hospital's religious restrictions before deciding where to seek care" (Hasselbacher et al, 2020, pp. 107). In this last section, the indirect and direct consequences of the overturning of Roe V. Wade will be explained to get a full understanding of how complex this issue is.

Consequences

Lack of access to safe abortion procedures and other reproductive healthcare services has and will continue to hurt racial and queer minorities. Women of color and lower socioeconomic status are more likely to experience higher rates of abortion than white women of the same status. This is partly due to the health disparities that exist for women of color, in particular, abortion disparities. These disparities are tied to systemic issues experienced by those in disadvantaged communities. For example, access to healthcare, healthy food or clean water, high-stress levels, exposure to racial discrimination, and lower living and working conditions

(Dehlendorf, 2013). The U.S. healthcare system continues to fail to provide adequate care for women and women of color. This is evident in the maternal mortality rates. The maternal mortality rate in 2020 was 23.8 per 100,000, which is the highest maternal mortality rate among all high-income countries (Kapadia, 2022). The mortality rate is three times higher for Black mothers than that for white mothers. The issue that arises with limiting access to safe abortions is the increase in one's chances of getting pregnant as the resources available to you are narrowing. The truth is limiting abortion doesn't stop abortions. It just stops safe ones from being performed by a professional. Another group that is disproportionately affected by this issue is members of the LGBTQIA+ Community. According to the American Medical Colleges (AAMC), "adverse health outcomes including miscarriage, stillbirth, preterm births, and infants with low birth weight are higher for LGBTQIA+ birthing people. Physical and mental health are inextricably linked to one another, and LGBTQIA+ people shoulder higher burdens of mental distress, anxiety, and depression" (Alvarado et al, 2022). This is due in part to fear of discrimination in not having healthcare professionals who are competent and can effectively give care a patient may need without bias. Another major group that will be impacted by the overturning is young people (teens/young adults). Young people are more susceptible to experiencing unintended pregnancies as there is a lack of sex education and access to condoms or other forms of contraceptives and are surrounded by the pressures of hook-up culture. These vulnerable populations are put in further dangerous positions to receive care. A major factor is access as typically more white people have the money or resources to travel to another state if they needed an abortion, yet, in reality, many don't have this option. A future consequence is an implication of Christian Nationalism on the laws passed. Christian Nationalism is an ideology that has motivated and continues to motivate a subset of American Christians to fuse their religion into

civic life. The fusion has a specific vision of Christianity including certain assumptions about race, gender, nationality, and sexuality (“Crusading”, 2020, pp. 591). It calls for states to instill Christianity in their national identity. It draws on ideas from the Bible like the Old Testament and centers around an ethnocultural concept. Its followers include violent extremists who are willing to go to extreme lengths to bring down democratic processes to create their vision of a white Christian nation. Another future consequence to keep in mind is the risk of other major cases being overturned like the right to same-sex marriage (Obergefell vs. Hodges) and the right to buy and use contraceptives (Griswold vs. Connecticut).

Conclusions

The overturning of Roe V. Wade was a historical moment and an awakening to the significance of upholding the separation of church and state in order to protect abortion rights. Historically, the Supreme Court has been dominated by a majority of Catholic justices. It is concerning that this majority has been upheld for the last two decades as the Supreme Court is meant to represent Americans in an unbiased manner. More laws have been passed that have ideas with religious ideologies, and special Christian beliefs. With Catholic hospitals making up a majority of hospitals, patients are expected to know what procedures would be allowed. Patients shouldn’t be expected to know if the hospital they are going to is religiously affiliated and/or if they will be given care based solely on a patient’s health and not on religious beliefs. In addition, Healthcare professionals should be able to treat patients without having to worry if the treatment matches a hospital's religious guidelines. Our country needs to seriously consider the underlying issues that are going on with abortion care and what is at stake for our country going forward.

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