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# 'Voodoo biology': the right-to-life campaign against family planning programs in the United States in the 1980s

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**ABSTRACT**

Title X, a federal program funding family planning services in the United States, had broad popular and political support throughout the 1970s. But in the early 1980s, it was subjected to a relentless campaign by anti-abortionists, most notably the Catholic absolutist Judie Brown. Brown blended social with economically conservative rhetoric, attempting to persuade Republican President Ronald Reagan and the broader right-to-life movement that attacking Title X was a legitimate means of targeting its largest recipient, Planned Parenthood. In highlighting Brown's activism and lobbying, and the actions of pro-lifers within the bureaucracy, this article illuminates the strategies of socially conservative women and their place within the contemporary Right. It also historicizes conservative interest in family planning and demonstrates the tension within the Reagan Revolution as single-issue activists struggled to compel the administration to match words with actions.

On 1 May 2018, a coalition of 85 national and state anti-abortion groups wrote to Alex Azar II, Secretary of the Department of Health and Human Services (HHS).[1] They petitioned him to alter the distribution of federal Title X family planning grants by reinstating the so-called 'gag rule', a set of regulations affecting abortion counseling, referral, and advocacy, and which require the physical separation of family planning services and abortion provision. In a show of cooperation between the right-to-life movement and elected officials, 41 senators and 153 members of the House of Representatives, all but one of whom was a Republican, made the same demand on the same day. Politicians and right-to-lifers agreed this would honor Republican President Donald Trump's campaign promise to defund 'abortionists', or more specifically, Planned Parenthood Federation of America (PP).[2] The 'gag rule' was first introduced by conservative Republican President Ronald Reagan in 1988 but was ultimately in effect for only one month. Now, 30 years after it was first proposed, it will be implemented nationwide. HHS issued the new regulations as a final rule in March 2019, and although pro-choice groups have challenged them in court, on 20 June 2019 a panel of federal appeals court judges ruled they can go into effect immediately.[3]

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One of the signatories to the 2018 petition was Judie Brown, a devout Catholic and the founder and head of American Life League (ALL). ALL was not a high-profile member of the 2018 coalition, appearing two-thirds of the way through the list of supporting organizations. However, in the early 1980s, when Brown was at the peak of her political and movement influence, she honed new rhetorical strategies and arguments to link PP and Title X so that criticism of one was understood as a clear indictment of the other. Title X, which has the primary purpose of allowing low-income women to access comprehensive reproductive health services, became a bargaining chip for right-to-lifers who were disappointed by the Reagan administration.

Brown's campaign against Title X sits at the intersection of several related fields of historical scholarship and points to the complexity of conservative politics in the late twentieth-century United States. Recent developments in the historiography of the right-to-life movement have deepened understanding of the evolution of abortion activism, and Daniel Williams and Mary Ziegler offer nuanced insights into the liberal and progressive elements within the early movement. Other scholars have shed light on pro-life ideology, belief, and grassroots activism.[4] Scholarship by Robert Self, Seth Dowland, J. Brooks Flippen, and Gil Frank on the politics of 'family values' has also illuminated the way that abortion functioned within broader conservative discourses about gender, sexuality, and the family.[5] In general, the scholarship on the pro-family and pro-life movement focuses on the political and social shifts of the 1970s rather than the period when they entered the mainstream under President Ronald Reagan. Although Reagan used the rhetoric of the morally interventionist state and oversaw the escalation of the culture wars, he frequently left the enactment of his social agenda to administrators and advisors, focusing his energy on economic and foreign policy. While the experiences of the Religious Right have been well explored, less historical attention has been afforded to the way that other elements of the Reagan Revolution experienced his 'pragmatic conservatism'.[6] Brown's activism and ideological views, along with actions undertaken by female pro-lifers in the bureaucracy, also make this case study relevant to scholarship on gender and conservatism, particularly the work of Stacie Taranto, Karissa Haugeberg, and Donald Critchlow.[7] These studies often focus on activism oriented around women's status as homemakers and grounded in maternalist appeals. Although Judie Brown was a socially and religiously conservative woman, her campaign against Title X was not presented as a defense of motherhood or in explicitly gendered terms.

This article analyzes Brown's history as an activist and her construction of 'the problem' with Title X, drawing from her personal correspondence, Congressional testimony, newspaper columns and interviews, ALL's print materials, and staff files from the Reagan administration. Brown shifted confidently between discursive frames, relying on family values rhetoric when talking to the grassroots but rarely using this justifying logic when lobbying politicians. Concluding that Reagan was not moved to act by pro-life and pro-family arguments, she worked to link socially and morally conservative arguments with neo-liberal and economic critiques of big government. Brown's experimentation with new types of arguments provide important insights into how the Reagan years shaped the agenda of single-issue conservative movements. This article charts the history of pro-life hostility to federal support for family planning, revealing the strategies used by opponents of abortion as they undermined and stigmatized access to legal services.[8] It reveals the frustration that some right-to-life activists had towards the Reagan

administration, along with the comparatively shallow nature of Reagan's interest in Title X. It also explores the way that socially conservative women engaged with policy debates and the possibilities and limitations that the Reagan Revolution afforded them. Although Brown's years of lobbying were not credited as the basis for the 1988 rule change, she helped turn Title X and family planning into legitimate targets for anti-abortionists and conservative Republicans.

## Title X, Planned Parenthood, and contraception

The US federal government's involvement in domestic family planning was an extension of the liberal agenda of the Great Society and the expansion of the welfare state in the long 1960s. Subsidies allowing low-income families to access birth control began in 1965 as part of Democratic President Lyndon Johnson's War on Poverty. In 1969, Republican President Richard Nixon called for Congress to enact formal family planning legislation. One of the chief sponsors of this legislation was future Reagan Vice President Representative George H.W. Bush (R-TX), who argued:

> We need to take sensationalism out of this topic so that it can no longer be used by militants who have no real knowledge of the voluntary nature of the program but, rather are using it as a political stepping stone. If family planning is anything, it is a public health matter.[9]

The *Family Planning Services and Population Research Act* (1970) passed Congress with a large majority in the House of Representatives and unanimous support in the Senate. This instituted Title X of the *Public Health Services Act*, providing low-income and uninsured Americans with family planning and sexual health services, including contraception, at little or no cost. Section 1008 of the Act stated, 'None of the funds appropriated … shall be used in programs where abortion is a method of family planning'.[10]

Throughout the 1970s, Title X enjoyed bipartisan support. Republicans and Democrats viewed it as having social and economic benefits, providing a public health service while helping to combat growing welfare costs. Public opinion polls showed 87% of Republicans and 82% of Democrats supported the government making birth control information available to all who wanted it.[11] In the late 1970s, under Democratic President Jimmy Carter, the budget for Title X grew by approximately $50 million, reaching $162 million in FY1981.[12] That year, over 5,100 grant recipients assisted 5 million Americans.[13] Title X disproportionately helped young women, minority women, and poor women.[14] Services were provided at hospitals and at an array of state, local, and privately operated family planning clinics. The largest national provider of Title X services was PP.

Although PP's founder Margaret Sanger had a radical and controversial past, by the post-WWII period PP had moved thoroughly into the mainstream of American life.[15] Moderate Republicans, including President Dwight D. Eisenhower, Vice President Nelson Rockefeller, Senator Prescott Bush (R-CT), and Representative Bush were prominent supporters of the nonprofit organization, as was Senator Barry Goldwater (R-AZ), the godfather of the modern conservative movement. Acceptance of contraceptives and family planning grew throughout the 1950s, accelerating with the release of the oral contraceptive pill in 1960. Although contraception was still illegal in some states, a 1965 study revealed 84% of ever-married women had used it.[16] With the Supreme Court's rulings in *Griswold v. Connecticut* (1965) and *Eisenstadt v. Baird* (1972), contraception became a

legal right for all Americans, regardless of marital status. In *Griswold,* the Court found for the first time that the constitution included a right to privacy.

Privacy lay at the heart of the Supreme Court's 1973 decisions in *Roe v. Wade* and *Doe v. Bolton,* which legalized all first trimester and many second trimester abortions and collectively overturned laws in all but four states. Although the anti-abortion movement had emerged in the 1960s in tandem with the abortion reform and repeal movements, prior to 1973 the bulk of right-to-life activism occurred at the local and state levels.[17] After *Roe,* the movement grew rapidly at a national level, seeking to end legal abortion either by a constitutional amendment or through a new Supreme Court decision. By the late 1970s, the political climate around abortion in the United States was increasingly polarized and anti-abortionists had achieved several notable victories. The Republican Party added a pro-life plank to its platform, the Hyde amendment banned the use of Medicaid funds for the abortions of low-income women, several prominent pro-choice Democrats were defeated in the 1978 midterm elections, and Ronald Reagan emerged as a high-profile ally. Some single-issue anti-abortionists found common cause with the emerging pro-family movement and the conservative evangelicals and fundamentalists of the Religious Right.

PP was the nation's largest abortion provider and was thus a target of right-to-life hostility. Where once it had been primarily concerned with family planning, reproductive health care, and population control, by the late 1970s it had evolved, becoming 'more political, more feminist, and more focused on the issue of abortion'.[18] During the 1980 election, PP debuted a series of television advertisements that emphasized its long history and worked to repurpose socially conservative rhetoric. Accompanying the image of a fluttering American flag, text proclaimed 'Planned Parenthood. Helping Build a Strong America by Helping Strong American Families'.[19] PP firmly rejected the idea that abortion was antithetical to family values.

After *Roe*, the consensus amongst most of the national pro-life leadership was that the cause needed to be strictly single issue. The National Right to Life Committee (NRLC) and Americans United for Life (AUL), the largest and most influential organizations, focused exclusively on the 'life issues' of abortion, euthanasia, and infanticide. Some organizations, such as American Citizens Concerned for Life (ACCL), supported birth control and family planning. Most right-to-lifers were silent on Title X because it did not fund abortions. Defenders of Title X, including individuals such as President Carter, often argued that the program was effectively pro-life, for by helping prevent unwanted pregnancies it helped prevent abortion.[20]

The anti-abortion movement also strove to be ecumenical and there were striking doctrinal differences between Protestants and Catholics on birth control and family planning. By the late 1960s, mainline and conservative Protestants supported contraception out of concerns about population and poverty, but also emphasized the importance of joyful sex within marriage. Before *Roe,* most Protestant denominations also endorsed abortion law reform, with several supporting complete repeal of all abortion laws.[21] The Catholic position, reiterated in the 1968 *Humanae Vitae* encyclical, was that the procreative potential of marital sex made it a sacred act and anything that artificially interfered with this potential violated church teaching. However, there was a large gap between doctrine and behavior, with one 1970 study revealing that 78% of young married Catholic women limited their family size by means that violated church teaching.[22] Even the US Catholic hierarchy quietly abandoned its legislative fight against contraception. During

the 1970 Congressional hearings on family planning, the Catholic Church emphasized that the program must be voluntary and must not fund abortion but offered little criticism of the plan to use tax dollars to pay for contraception and family planning programs.[23] Indeed, in 1980, Archbishop John Quinn, the president of the National Conference of Catholic Bishops, told the Synod of Bishops at the Vatican that there needed to be a 'completely honest examination' of the contraception issue because of the significant levels of dissent from clergy, theologians, and laity.[24]

Brown was part of a faction of conservative Catholic right-to-lifers that viewed the US Catholic hierarchy as 'cowards' who were 'afraid of publicity'.[25] Conservative Catholics viewed birth control and abortion as fundamentally linked, for 'once you accept contraception … the whole value system falls apart as to sex, because we leave out something essential'.[26] Separating sexual activity from its procreative potential they worried, would lead the public to accept abortion, infanticide, euthanasia, homosexuality, and 'other evils'.[27] Although early in Brown's marriage she had twice used an intra-uterine device, by the late 1970s she vehemently opposed all forms of contraception except natural family planning.[28] She often claimed that her split with the NRLC was because it would not take a stand against birth control. For Brown, family planning was not an ancillary target but a crucial site for action if the 'contraceptive mentality' was to be defeated and the broader social and spiritual crisis of legal abortion brought to an end. Brown was not the first pro-lifer or social conservative to criticize PP or Title X. She drew from the ideas of other conservative Catholics such as Randy Engel of United States Coalition for Life and Father Paul Marx of Human Life International. However, during the Reagan years, she was the most prominent pro-lifer actively pursuing this issue, working against Title X both within the movement and across the branches of government.

## Judie Brown

Judie Limbourne was born in 1944 in California. In the early 1960s, she was the western regional office manager at Kmart, and while helping open a new store in Utah she met Paul Brown, another Kmart employee. In 1967, they married, and 'her first official action as Mrs. Paul A. Brown was to resign' from her job.[29] In 1970, pregnant with her second child, Judie heard a homily about the effort to liberalize abortion law in Washington, now her home state. The Browns became dedicated pro-life volunteers, and each time they moved for Paul's work, Judie joined a local anti-abortion organization. By 1973 they had three children but her commitment to the cause did not wane and after *Roe* she developed a national right-to-life profile. In 1976, when Paul was transferred to Washington, D.C., she became the Executive Director of the NRLC, working as the right-hand woman to its president, Dr. Mildred Jefferson. In 1977, Paul founded the confrontational lobbying group Life Amendment Political Action Committee (LAPAC). After LAPAC helped unseat two prominent pro-choice senators in the 1978 midterms, the Browns were 'Mr. and Mrs. Pro-Life' and were profiled in national magazines and television programs.[30]

In 1979, Judie quit the NRLC to establish ALL, the so-called 'marine corps' of the pro-life movement.[31] The New Right, a group of conservatives trying to court fundamentalist Christians and purge moderates from the Republican Party, provided her with financial support, strategic assistance, and free publicity. By 1982, ALL had 75,000 supporters

and its monthly magazine, *A.L.L. About Issues*, was circulated in more than 30 countries.[32] ALL's motto was 'for God, for Life, for the Family, for the Nation' and under Brown's leadership, it rejected the incrementalist approach of groups such as ACCL, AUL, and NRLC. Instead, ALL adopted an absolutist stance, claiming that popular forms of birth control were abortifacients and seeking a blanket ban on abortion with no exceptions.[33] At the start of the 1980s, Brown was enmeshed in conservative circles in Washington, D.C. and was one of the nation's most powerful female right-to-lifers.

Brown was emblematic of a certain type of socially conservative woman leader. Along with Phyllis Schlafly and Beverly LaHaye, Brown had a national profile, ran a major activist organization, moved confidently in federal political circles, and regularly traveled and worked outside the home. All of this ran counter to the traditional gender roles and family values that these women espoused. Leading female social conservatives frequently used their status as wives and mothers to legitimate and further their agenda, relying on their personal values to downplay their very non-traditional behavior and lives. Schlafly liked to begin her anti-feminist speeches by announcing, 'First of all, I want to thank my husband Fred, for letting me come', a line she boasted 'makes the libs so mad!'[34] Brown also presented herself as representing older domestic values. A 1986 *Washington Post* profile noted that she looked, dressed, and proudly acted like 'every mother from 1956'. In the same profile, she revealed that for 17 years she had brought Paul his morning cup of coffee in bed. Even when lobbying interstate Brown's maternal obligations continued; she was responsible for calling home in the morning to get the children up as her husband liked to sleep in.[35] This narrative concealed that she struggled to balance her obligations to the cause and to her family.

Despite Brown's years of grassroots pro-life activism, political lobbying, and participation in the state and national movement, she described herself as a 'full-time, stay-at-home mom' until she began working for the NRLC. From this point, her activism continually challenged her 'pro-family convictions', she felt it prevented her from being a 'real wife and mother'.[36] Sometimes it encroached quite literally into the domestic realm. For two years, ALL's eight employees worked out of the Brown residence and 'the children felt like intruders in their own home'.[37] Although she focused upon her role helping to save the innocent unborn, her personal ambition also played a part. The job at the NRLC necessitated putting her young children in care while she worked 12-hour days, but she admitted the role was 'too tempting to resist'.[38] She later reflected about the early years of ALL, 'I felt that my husband and children should accept the fact that pro-life work demanded most of my waking hours, including evenings and weekends, and that housekeeping, cooking, and laundry were not matters I needed to be concerned with'.[39] Her ideological convictions made her experiences as a working mother particularly difficult. She continuously struggled with her heavy work commitments and on several occasions concluded that her dedication to the cause was a problem. But even as she believed in the sanctity of the home, she saw the abortion struggle as a crucial fight in the battle between good and evil.

Brown may have experienced this gap between ideology and lived reality more acutely because of her age. She was 15–20 years younger than counterparts such as LaHaye and Schlafly and from infancy, her children grew up fitting around her activism. Judie's national profile also challenged traditional gender roles, for although Paul remained an active pro-lifer, by the early 1980s she was far more influential and powerful than her

husband, and after the failure of LAPAC he joined ALL. As she grappled with her sense of herself as a wife and mother, it is striking that in the Title X fight she rarely depended on the maternal populism that was the stock in trade of the grassroots female pro-life activists analyzed by Kristin Luker and Stacie Taranto.[40] One possibility is that she shied away from this discourse because of her private discomfort about the way that her activism intruded upon her domestic life. It is more likely, however, that she simply did not view these claims as politically useful. By the early 1980s, Brown had been a committed pro-life activist for over a decade. She justified her arguments and analysis via reference to her own expertise and leadership rather than the lived reality of pregnancy and motherhood.

Brown was extremely skilled at tailoring her message to her audience. Unlike the NRLC or AUL leaders, she used explicitly spiritual language and arguments, but this was reserved for the grassroots and rarely appeared in her political lobbying. When working against Title X, she did not criticize family planning because it violated Catholic teaching, instead using the rhetoric of family values. Even this discourse was a relatively minor component of her lobbying arsenal; she relied most frequently on social scientific, regulatory, and economic claims. She modified her campaign against Title X in part because she concluded that the Reagan administration and allies in Congress were not moved to action by socially conservative arguments. She needed to pique the interests of federal Republicans while also convincing more moderate anti-abortionists that Title X was a worthwhile target. While Brown was frequently disappointed by Reagan and his advisors, Marjory Mecklenburg and Jo Ann Gasper, two female pro-lifers in HHS, ultimately pushed the White House to action, in the process becoming the face of socially conservative assaults on Title X.

## Women, abortion, and conservatism

In the 1960s and early 1970s, the public perception of the anti-abortion cause was that it was male dominated. During state level reform and repeal campaigns, small coalitions of men, most of whom were Catholic, spoke for opponents of abortion. Only a handful of women had leadership roles, and they had generally entered the movement with their husbands.[41] After *Roe*, anti-abortionists worked to combat the view that they were opposed to women's rights. Female voices were afforded new levels of prominence and took on expanded platforms within the movement.[42] Between 1973 and 1981, three of the five presidents of the NRLC were women: Mecklenburg, Jefferson, and Dr. Carolyn Gerster. In 1974, Nellie Gray organized the first March for Life (MfL) rally, which became *the* annual mass pro-life demonstration. That same year, after Mecklenburg was ousted from the NRLC, she founded ACCL. The rise of pro-life women leaders was not just about optics; by 1974 women made up over 80% of the grassroots movement.[43]

Mecklenburg (née Malo) was born in 1930 and was a liberal Methodist, mother of four, and a former home economics teacher. Politically, she was a moderate Republican who was recruited to work for the Ford-Dole Campaign in 1976. While the Browns were embedding themselves in the New Right and Religious Right circles in Washington, D.C., ACCL worked to distance itself from the polarizing and provocative tactics of these new allies. One month before the 1980 election, Mecklenburg published a scathing editorial about the 'radical conservatives' that had 'identified with the anti-abortion cause' because they were 'seeking political advantage'.[44] Throughout the 1970s, she and ACCL

were part of the small but significant progressive wing of the pro-life movement, and ACCL focused its energies on supporting birth control, sex education, and federal legislation that assisted pregnant women and single mothers. In 1979, ACCL was one of the few pro-life groups that participated in a summit with feminist and pro-choice leaders to discuss issues of mutual interest. Brown chided the right-to-lifers who attended, declaring that there could be no common cause for 'the reality of the issue is death'.[45] Although Mecklenburg and Brown did not agree religiously, politically, or tactically, after Mecklenburg was appointed in HHS she played a significant role in destabilizing Title X from within the bureaucracy.

Beyond the right-to-life cause, the 1970s also saw the formation of influential new socially conservative organizations led by women. Phyllis Schlafly, through Eagle Forum, played an instrumental role in the mobilization of self-described traditional women opposed to second-wave feminism and the Equal Rights Amendment (ERA). The protests and counter-rally she organized against the 1977 International Women's Year Conference also helped generate a new strand of the Right, the family values movement. Jo Ann Gasper began publishing *The Right Woman,* which strove to give readers 'legislative information and insight which you can use to prevent government intrusion in to the family'.[46] The National Pro-Family Coalition (NPFC), headed by Connaught Marshner, became a significant New Right organization with a multi-issue agenda. The emergence of the Religious Right in the late 1970s also saw the formation of groups specifically for evangelical and fundamentalist women. Concerned Women for America (CWA), headed by Beverly LaHaye, eventually became the largest conservative women's organization in America.

Gasper (née Shoaf) was born in 1946 and was a proud conservative from Texas. Although she was a self-described traditionalist, even as a young woman she was professionally ambitious and shunned career paths coded as traditionally feminine. In 1969, Gasper became the first woman to receive an MBA from the University of Dallas and she subsequently worked as a business manager before starting her own consulting company.[47] She married in 1974 and had five children, two of whom were born during her time working in the federal bureaucracy under Presidents Reagan and Bush. Gasper was a Catholic convert but her activism was triggered by Schlafly, not *Roe*.[48]

After Gasper began publishing *The Right Woman*, her national profile rose quickly, boosted by a column in the new *Conservative Digest* magazine. During the 1980 campaign she served as Reagan's Family Policy Advisor, and a March 1981 poll ranked her as one of the ten most admired conservative women in America, alongside Schlafly, LaHaye, Marshner, and Nancy Reagan.[49] Unlike Brown, Gasper framed her socially conservative activism and work in the federal bureaucracy in terms of maternalism and sacrifice, crediting her involvement in conservative politics to her desire for her children to live in a better country. In 1987, during the height of the controversy over her tenure in in HHS, she assured the readers of *Conservative Digest* that 'at some time I do hope to go back to being a full-time wife and mother'.[50] However, after she was fired by HHS, she quickly accepted a role in the Department of Education, ending her political career in the early 1990s after the birth of her fifth child.[51]

Despite the political awakening of the housewives, Republican women found themselves marginalized during the Reagan years. In 1980, Mary Crisp, a former Goldwater campaigner and the co-chair of the Republican National Committee, spoke passionately

against the anti-abortion, anti-ERA, and family values planks in the platform. In response, Reagan questioned Crisp's loyalty to the party, causing her to resign.[52] During the presidential transition, several conservatives encouraged Reagan to appoint Schlafly as Deputy Secretary of Defense or Deputy Secretary of Education, but she was not given a role in the new administration.[53] Less than six months into Reagan's presidency, White House staffers warned that because there were no women in cabinet and very few high-ranking women in the administration, the public believed that Reagan and his senior advisors were 'anti-women'.[54] Concerns about the electoral gender gap were directly cited as a reason to nominate Sandra Day O'Connor when the first vacancy occurred on the Supreme Court.[55] Although Reagan appointed hundreds of women to jobs across the bureaucracy, these were generally low or mid-level roles and the lack of women in authoritative or leadership roles continued to attract attention.[56] Ultimately, three women served in Reagan's Cabinet, two of whom, Elizabeth Dole and Margaret Heckler, were moderate Republicans.

Right-wing women were divided over the question of whether Reagan and the conservative movement had a woman problem. Some, such as Marshner of the NPFC insisted, 'I've always found that women have risen to the level of their competency'. Gasper admitted that conservative women 'cannot continue to work for candidates and not be recognized', but was confident that the Reagan administration would correct its 'lack of concern for us'.[57] Reagan and his advisors rejected charges that he was opposed to women's advancement, and he regularly pledged his support for women's full participation in society and used the language of equal opportunity and choice. However, he also spoke critically of 'tokenism' and 'false quotas' and rejected direct government action to promote equality, an approach Marissa Chappell has characterized as 'free-market feminism'.[58] Many socially conservative women shared this conviction that America was a meritocratic society and scoffed at feminist diagnoses of widespread sexism and social inequality. As Brown would later reflect:

> it has always been a bit hard for me to understand why some women complain about the difficulties of competing in the job world … I worked hard, I did my job well, and I was recognized and rewarded for it.[59]

For most of the 1980s, conservative women struggled to wield political power. Those who became 'insiders', such as Mecklenburg and Gasper, quickly butted up against the limits of their authority, chafing against the regulations and hierarchies in HHS that limited their ability to implement change. The most influential women operated outside formal sites of political power; they headed their own organizations and used this as a platform to engage in policy debates. Schlafly and LaHaye were useful for the White House, regularly mobilizing their followers in support of Reagan's agenda. They rarely criticized Reagan. Indeed, Schlafly chided conservatives who clashed publicly with the White House, arguing that the Right 'had to maintain a united front if there was to be any hope for progress'.[60] At the end of the 1980s, both women remained embedded in federal political circles. In contrast, Brown's single-issue focus and absolutist vision of abortion politics meant she was publicly critical of the Reagan administration, Republicans in Congress, and incrementalist right-to-life groups such as the NRLC. She rejected efforts to erode abortion rights and claimed to abhor compromise. She was increasingly marginalized

but did not experience this in terms of her gender, instead viewing it as further proof of her dedication to the cause.

## The Reagan administration, Title X, and abortion

Reagan had a checkered past on abortion while governor of California, but from 1975 he was an outspoken critic of *Roe*. During the 1980 campaign he courted pro-lifers as well as the Religious Right and the pro-family movement. He also ran as a conservative, the first time since the 1964 election that a presidential candidate had explicitly rejected the liberal consensus. On 4 November 1980, Reagan won the presidential election and Republicans gained control of the Senate for the first time since 1954. Anti-abortionists were the first citizens group in the White House after the inauguration, and Reagan nominated several prominent pro-lifers and social conservatives to administrative and bureaucratic posts. Mecklenburg and Gasper were appointed in HHS, with Mecklenburg given authority over family planning and population programs. Dr. C. Everett Koop, a paediatric surgeon and prominent evangelical opponent of abortion, was appointed Surgeon General. Richard Schweiker, one of the first in the Senate to support a constitutional amendment banning abortion, was named as Secretary of HHS. On 22 January 1981, the anniversary of the *Roe* decision, Schweiker addressed the March for Life rally, assuring the audience of between 50,000 and 65,000 right-to-lifers that they had 'a pro-life friend' in the Department. This was the first time a member of Cabinet had appeared at the most important annual event on the right-to-life calendar.[61]

With good reason, PP was alarmed by Reagan's victory. Its representatives sought to meet with members of the administration to correct any misapprehensions Reagan might have. Multiple White House advisors maintained that nothing would be gained and a meeting did not occur.[62] Instead, Schweiker initiated an investigation into PP and audits of Title X. Reagan's first budget embraced the 'new federalism' and sought to devolve the delivery of numerous services to state and local governments.[63] It recommended the adoption of a new 'block grant' system that would have merged family planning with other health care programs and allowed the individual states absolute discretion in distributing funds. Senate conservatives testified in support of the new federalism and against PP and Title X. ALL enthusiastically supported block grants and tracked the minutiae of the budget's progress in Congress. The footer of every page of the June *A.L.L. About Issues* exhorted readers: 'Support block grants—stop Planned Parenthood —write a letter today!'[64] However, after a tense House-Senate Conference Committee, block grants for Title X were rejected, which was in accordance with instructions from the White House, for Reagan wanted a clean budget reconciliation bill.[65] In the final budget for FY1982 total funding for Title X programs fell by almost 25% but this reflected across-the-board budget cuts.

The failure of block grants paled into insignificance when compared to the other disappointments that right-to-lifers experienced in Reagan's first years in office. They were horrified by his selection of the moderate Republican Sandra Day O'Connor to fill a Supreme Court vacancy. Believing she was 'pro-abortion', the movement campaigned against her nomination until the bitter end. Activists then split over two competing Congressional approaches to end legal abortion, the Human Life Bill and the Human Life Federalism Amendment. The Reagan administration distanced itself from the struggle, which

frustrated pro-lifers, who called on the White House to support legislative efforts to ban abortion. When Reagan did act on abortion, it was generally shaped by the electoral cycle. The publication of 'Abortion and the Conscience of the Nation' and the declaration that 22 January was National Sanctity of Human Life Day was timed to ensure enthusiastic pro-life support in the 1984 election. So too was the introduction of the Mexico City Policy, which prohibited international NGOs that received US population aid from providing advice, counseling, or information about abortion to pregnant women. None of these actions changed the status of abortion in the United States.[66]

Despite the GOP's platform, there were significant intra-party divisions over abortion and several powerful Republican senators were pro-choice. To avoid potentially damaging confrontations between the White House and Senate Republicans, the administration generally avoided direct interventions when abortion emerged as legislative issue, which meant Reagan did not use rhetorical or heresthetical influence in Congress to try and achieve anti-abortion goals. This stood in marked contrast to his skilful use of presidential influence to advance controversial elements of his economic and foreign policy agendas. It was only in Reagan's second term, when he was at the nadir of his power after Republicans lost control of the Senate and the administration was rocked by the Iran-Contra scandal, that he made bold policy and judicial interventions. In quick succession the administration introduced the President's Pro-Life Bill, nominated Robert Bork to the Supreme Court, and demanded regulatory changes to Title X.[67] These moves, most of which failed or stalled, primarily served as political theater, serving to energize the base and cultivate Reagan's pro-life legacy.

For most of Reagan's time in office, Brown's campaign against Title X went nowhere. After 1981, the administration lost interest in pursuing major change around Title X. Reagan, committed to his 'new federalism' agenda, continued to try and absorb Title X into a block grant; these efforts were defeated. Title X did not experience further budget cuts, and over the next two years Congress increased appropriation levels. Although there were regulatory changes proposed by pro-lifers in the bureaucracy, many of these tinkered around the edges of the program or stalled due to legal challenges. Repeated audits of PP and Title X found no evidence that federal family planning funds 'had been used to pay for abortions or to advise clients to have abortions'.[68] The White House and HHS rebuffed Brown by quoting these audits back to her.[69] Schweiker left HHS in 1983 and the next two Secretaries were also opponents of abortion, but they posed little direct challenge to the program. In 1984, HHS's new head Margaret Heckler testified before Congress that 'family planning clinics have honored the law' and took pains to praise the Title X program.[70] Otis Bowen, who served as head of HHS from 1985 to 1989, was similarly reluctant to initiate an overhaul of federal family planning.

Brown viewed her campaign against Title X as mutually beneficial for right-to-lifers and the Reagan administration and pitched it to the White House as a way it could offer 'incremental gains' to ensure continued movement loyalty.[71] She spent several years pushing politicians and bureaucrats in Congress, the White House, and HHS to defund and destabilize Title X. Brown argued that the White House or HHS could institute sweeping regulatory changes to Title X without Congressional approval. Until 1987, this argument was rejected by the White House and HHS, which insisted that major changes had to be made legislatively. Brown also worked to persuade grassroots pro-lifers that attacking family

planning should be a core movement goal. *A.L.L. About Issues* included a regular section dedicated to exposés of local programs and ALL produced an array of pamphlets, booklets, and advertisements condemning Title X.

For Brown, targeting Title X was a way of attacking PP. She viewed the organization as responsible for an array of wrongs, exemplified in a series of graphic pro-life print advertisements ALL created for inclusion in local and regional newspapers. Several involved a close-up photograph of an aborted fetus in a garbage bag captioned with a common pro-life phrase; 'This is what they mean by Planned Parenthood'. One 1982 advertisement listed 13 'facts' about PP and International Planned Parenthood Federation, accusing the organizations of being racist, anti-religious, preying on the poor, encouraging male sexual exploitation of women, corrupting the young, and profiting from charitable contributions.[72] Another advertisement asked, 'Hey, Mom and Dad! Did you know there's an organization that's trying to replace you? It's called Planned Parenthood'. ALL's consistent theme was that 'American taxpayers' were subsidizing PP's 'anti-family, anti-child, anti-life' agenda. Despite this litany of offences, when working against Title X Brown focused on three core charges: PP was hostile to the family, engaged in bureaucratic malfeasance, and contributed to the economic woes of the nation. PP affiliates received approximately 25%–30% of the total family planning appropriation.[73] Because of PP's alleged transgressions, Title X was deeply compromised.

## The family

The pro-family movement and the Religious Right shared a romanticized vision of the heterosexual nuclear family, which they credited as the bedrock of American stability. They saw the family's core function as 'the rearing and character formation of children', arguing that it was 'the best and most efficient "department" of health, education, and welfare'.[74] Changes in family life had societal implications, and they viewed the family as being under assault from a secularizing culture, liberalism, and government overreach. Brown positioned PP at the center of these interrelated developments. Partially co-opting the rhetoric of the pro-choice movement, she called on Americans who were sick of PP 'in their bedroom, in their living room, in the classroom, in the clinics, and in the courts working against parental rights' to rally against the organization.[75]

Family values rhetoric frequently put a secular spin on spiritual claims, but ALL sometimes relied on explicitly religious imagery and language to discuss PP. Brown framed PP as a taxpayer-funded organization working to destroy Christian values and to promote secular humanism. Like many in the Religious Right, she believed the 'traditional family' was a Biblically ordained unit; anything that undermined the family was morally suspect. When talking to the grassroots, ALL depicted PP as representing the forces of Satan, using the Biblically loaded image of the serpent to accompany articles and pamphlets about the group. ALL warned that in 'everything they say, give away, do and sell' PP displayed a 'blatant disregard for God'. Sometimes ALL echoed the millennial and apocalyptic rhetoric of the Religious Right, in one pamphlet asking followers to 'pray that God will not unleash His wrath on this nation before we as His soldiers have the opportunity to turn this immoral and unthinkable evil [e.g. PP] away from his eyes'.[76] Religious language did not appear in lobbying materials targeted at politicians and bureaucrats.

While a maternalist argument might have emphasized that PP encouraged women to reject their natural role as mothers, Brown focused instead on PP's intrusion into the domain of the family via its provision of reproductive health care and sex education to minors. She was capitalizing on the relatively widespread national concern about the impact of the sexual revolution on young people, or more specifically, about the sexual activity of unmarried female adolescents. In the late 1970s it was estimated that approximately 40% of adolescent girls would become pregnant and the media, politicians, and public health officials warned of a 'teen pregnancy epidemic'. This hysteria had a questionable basis, for the teen pregnancy rate had steadily declined since the highpoint of the baby boom. What had changed was that out-of-wedlock births had more than doubled since 1960.[77] President Carter's Secretary of Health, Education, and Welfare made adolescent pregnancy the top domestic priority, with family planning and access to birth control seen as vital policy tools. In 1978, Congress amended Title X's initiating legislation to clarify that services should be provided to adolescents. Under Reagan, there was a new emphasis on adoption and abstinence via the Adolescent Family Life Act (1981), but Title X remained the exponentially larger and better funded program.[78]

In the early 1980s one third of Title X clients were adolescents, and Brown presented PP as enticing them 'toward their destruction', giving them contraceptives, abortion counseling, and abortion referrals without parental consent.[79] A 1982 ALL booklet offered a compendium of articles and accusations that purported to prove that PP had eroded the integrity of the family unit. The cartoon on the cover provides a particularly vivid illustration. Three teenage girls are arranged on the steps of a high school. Sitting amongst them is the figure of PP, depicted as a 'dirty old man' complete with trench coat and lascivious expression. With one hand on the leg of a girl in a varsity jacket, he assures her, 'No matter what Reagan threatens me with, I won't tell your parents our little secrets'.[80] Brown believed that PP promoted anti-parent attitudes and sought to break the bonds between children and their mothers and fathers. Brown's narrative ignored that teenagers might have rights as sexual subjects, instead framing them as a vulnerable population.

Brown was also deeply concerned by Title X funding PP to provide sex education courses and materials to young people. PP presented masturbation, pre-marital sex, casual sex, and homosexuality as forms of self-exploration and cautioned young people to avoid condemning or judging others for their sexual expression. These messages appalled social and religious conservatives, who interpreted them as reflecting moral relativism and undermining traditional values. The problem was not precisely with sex education, after all, the mechanical and scientific aspects of sex had been part of many health classes. Rather, as Schlafly explained, the issue was that the 'major goal' of the new type of sex education was 'to teach teenagers (and sometimes children) how to enjoy fornication without having a baby and without feeling guilty'.[81] *A.L.L. About Issues* dedicated a significant amount of magazine space to persuading grassroots pro-lifers that sex education was a crucial issue that the rest of the movement had ignored. ALL warned that remaining silent on sex education would mean that the movement 'lost an entire generation of children to the evils of immorality that will simply IMPRINT ABORTION FOREVER IN OUR SOCIETY!'[82] Even after the federal government began funding abstinence education, ALL remained fixated on PP's ability to use tax dollars for its educational materials and the inability of local communities to control content.

Brown believed that PP was motivated by secular humanism and financial self-interest. She claimed that the group targeted the young:

> Tearing down their moral underpinnings, inviting them to any sort of sexual activity imagined … destroying their every sense of self respect, [because] it is a very easy way of turning out an entire generation of Americans who will have no respect for the preborn, the elderly, themselves or anyone else.[83]

She accused PP of unscrupulously 'creating a demand' for its programs, for the 'free "salted peanuts" of easy sex creates a "thirst" for [their] goods and services'.[84] When she lobbied politicians, however, she muted this conspiratorial language and instead suggested that providing contraceptives and encouraging sexual liberation had resulted in high rates of abortion, teen pregnancy, sexually transmitted diseases, and divorce. In short, through Title X, Brown claimed the government had inadvertently helped to create the 'teen pregnancy epidemic' and given tacit support to the 'permissive society'.

## Bureaucracy and the budget

Parental rights figured prominently in materials aimed at Religious Right activists, but in Brown's communications with the White House, HHS, and Congress, she focused primarily on secular issues of policy implementation and appropriations. Brown's criticisms were diverse, aiming to demonstrate that on multiple levels, Title X recipients were wasteful and violated the law. She sought two interrelated actions from the Reagan administration: strict new regulatory language and punishing budget cuts.

Brown pragmatically tailored her Title X arguments to the audience in Washington, D.C. While Religious Right and pro-family organizations frequently lobbied to cut programs that ran counter to traditional values, Brown advanced a different argument. She insisted that in a time of stagflation and unemployment, extraneous fat needed to be trimmed from bloated government programs such as Title X. This was a concerted effort to build a bridge between the right-to-life cause and the economic conservatives who seemed to have the most influence in the White House and the Senate. Emphasizing fiscal restraint and focusing upon bureaucratic mismanagement allowed Brown to position herself within the broader scope of neo-liberalism and small government conservatism.

Although Title X funds could not be used for abortions, since the 1970s, HHS had allowed grant recipients to provide abortion with private money, conditional on clear, accessible, and separate accounts and records. Hospitals were the primary site where abortion and Title X services coexisted; out of 750 PP clinics nationwide, only 50 performed terminations.[85] While the vast majority of Title X recipients were not abortion providers, this issue was the thin end of the wedge for Brown. Initially, she insisted that PP used Title X dollars to fund abortions. After multiple government audits revealed no misuse of federal funds, Brown changed tactic, focusing on fungibility. Since Title X and abortion services could be offered at the same location by the same provider, Brown argued that any financial separation was artificial and permeable. The only meaningful way to cordon off taxpayer dollars from abortion provision was to completely prohibit PP from accessing Title X funds. Journalist Ellen Goodman described this call for a 'wall of separation' as a form of 'voodoo biology', an illogical attack on a program that had the

primary purpose of preventing unwanted pregnancies. Goodman accused anti-abortionists such as Brown of using fungibility arguments as a pretext for a much broader agenda, namely building 'a wall that would separate families from planning'.[86]

At the heart of Brown's policy argument was that PP's ability to access federal funds served to normalize abortion. As she explained, poor or low-income women who sought services at a Title X clinic did so 'considering the planning of a family, which means children—not the planned execution of children already conceived'.[87] In her view, PP's ability to counsel and refer for abortion using Title X funds violated the intent of the law and implied that abortion was just another family planning measure. Her consistent demand was that politicians and bureaucrats needed to 'get the government out of the abortion advocacy business'.[88] Brown demanded restrictive new regulatory language and a ban on abortion referrals and counseling.[89]

Brown also claimed that Title X was improperly administered. Most of her political lobbying hammered themes of inefficiency, mismanagement, and duplication of services. In the early 1980s, two Government Accounting Office (GAO) reports on Title X outlined issues with program delivery and Brown referred regularly to these findings, falsely implying that 'waste', 'abuse', and 'fraud' were government language.[90] She insisted that at least $48 million, or a third of the total appropriation, should be cut to force Title X recipients to revise their service provision model.

Despite her many allies in HHS, Brown nevertheless viewed the Department as an adversary. When HHS did not react to the GAO reports, Brown mockingly described it as using 'bureaucratic gobbledygook that in effect says we are not going to do anything positive or specific'. In 1982 testimony, she implored Congress to force HHS to properly administer Title X rather than tolerating 'such a see-no-evil, hear-no-evil operation'.[91] Impatient with 'pro-life friend' Schweiker, she demanded he ensure the 'mess in the Title X program gets cleaned up immediately', warning that 'anything short of your personal involvement will signify your acquiescence in what amounts to a bureaucratic cover-up of millions of dollars of waste and abuse'.[92]

Brown's arguments offered an economic rationale for defunding family planning services, but they fell on deaf ears. After she was disappointed by the FY1983 budget briefing, which proposed to continue Title X funding at FY 1982 levels, Brown called on Reagan to be 'mean as a junk yard dog on waste and abuse' and vowed that ALL would publicly oppose the entire budget if the Title X allocation was not reduced.[93] In the weeks before Reagan announced the proposed FY1984 budget Brown engaged in a flurry of activity, repeatedly criticizing the administration for its 'total lack of response' to the GAO Reports and warning that an 'austere' budget that did not defund 'programs riddled with documented waste and abuse … will be discredited the day it appears'.[94] At the annual White House meeting with right-to-lifers on 21 January 1983, Brown presented Reagan's advisors with a list of potential presidential actions, two thirds of which related to family planning funding and regulation. When the budget was released and Reagan had not proposed a reduction of Title X funds, Brown's press release denounced Reagan for having 'joined the social pork barrel mentality that you can't cut even documented waste if it is considered a "people's program"'. She insisted that Reagan's fiscal policy was based on fraud and accused him of having 'raised a white flag of surrender'.[95]

By Reagan's second term, Brown's personal campaign against Title X had petered out, but undermining the program had become a much more broadly accepted right-to-life

goal. The introduction of the Mexico City Policy was the biggest victory that opponents of abortion achieved during Reagan's first term, and it led them to view domestic family planning as similarly ripe for action.[96] In 1985, conservatives in Congress attempted to add amendments to Title X funding to prevent abortion referral or counseling and to bar tax dollars from going to any family planning provider that also performed abortion with private funds. During the legislative debate, the NRLC condemned Title X as the 'largest single funding source' for organizations 'that aggressively promote abortion'.[97] By 1988, the NRLC comfortably echoed much of the language that Brown had used since the late 1970s, describing PP as having an 'enormous financial stake in teenage abortion', as trying to 'lure high school students' into 'sex clinics', and as being an 'evil industry' that encouraged 'our young people to experiment with sex'.[98]

Even as Brown's arguments and rhetoric about Title X and PP entered the mainstream of the anti-abortion movement, she was drifting to the political margins. In the early 1980s, during the movement split over a Congressional approach to end legal abortion, Brown furiously attacked movement rivals, including the Catholic hierarchy, right-to-life groups such as the NRLC, AUL, and ACCL, and Senator Orrin Hatch (R-UT). Her tendency to name and shame disappointing political allies further reduced ALL's level of influence. In 1985, the Browns also fell out of favor with Reagan's advisors after refusing to stick to 'briefing book' issues during a White House meeting. White House advisors informed them they would never be asked back, which they viewed as proof of their commitment to the cause, later commenting about the NRLC, 'They're invited into the White House. Big deal'.[99] In 1987, Brown was the leading right-to-life opponent of the President's Pro-Life Bill, condemning it as a weak and vague measure that did not define when life began and which potentially delegated abortion regulation back to the states.[100] When the administration experienced multiple setbacks filling a Supreme Court vacancy, ALL told the press, 'after years of trying, [those in the White House] have finally mastered incompetence'.[101] Brown had spent years providing the administration and HHS with discursive ammunition against Title X, but she was not a part of the conversation when a major change finally occurred.

## Allies in the bureaucracy

In March 1981, Marjory Mecklenburg was appointed Deputy Assistant Secretary for Population Affairs and Director of the Office of Adolescent Pregnancy in HHS. Shortly into her tenure in the federal bureaucracy, a Guttmacher Institute report suggested that increased access to contraceptives had not decreased the adolescent pregnancy rate.[102] Social conservatives viewed this as proof that abstinence, rather than birth control, was the solution. In February 1982, Mecklenburg introduced a new regulation requiring Title X recipients to notify the parents of adolescents under the age of 18 when they received prescription birth-control devices. The stated rationale was to protect the health of minors and to encourage family communication about sex. Quickly dubbed the 'squeal rule' by the *New York Times,* the measure was broadly condemned for undermining the privacy rights of teenagers and for its public health implications. Leading moderate Republicans in the Senate joined Democrats in criticizing the policy.[103]

Initially, ALL opposed the parental notification requirement. Because notification occurred 'after the fact', namely after a medical consultation had occurred and birth-

control prescribed, it did not allow parents 'to exercise their … rights and responsibilities'. Nor was it an abstinence measure. The regulations also said nothing about sex education or abortion referrals and counseling. Ultimately, ALL believed that HHS should require parental consent before any Title X services could be provided to adolescents. ALL leaders complained bitterly to Reagan, the top advisors in the White House, and Schweiker about the lack of consultation. It encouraged grassroots members to bombard the White House and HHS with letters calling for an end to 'federal involvement in the sexuality of … children'.[104] The administration ignored these complaints, but ALL eventually joined other pro-life and pro-family groups in defending the parental notification requirement after it attracted public criticism. Family planning and pro-choice organizations filed lawsuits over the regulations and it was invalidated by federal courts, never coming into effect. Neither the administration nor HHS attempted to modify or revive the regulations, leading some cynics to conclude that the almost $600,000 in litigation costs (including the legal costs of family planning groups) had simply been the price of repairing the rift between the Reagan administration and opponents of abortion before the election.[105]

Mecklenburg left HHS under a cloud in 1985, dogged by rumors of an affair with a co-worker and allegations of misappropriated funds. In her letter of resignation, she claimed that she wanted to spend more time with her family, but also blamed other bureaucrats for being 'too inflexible to adapt to pursuing the goals of this administration'.[106] Mary Ziegler notes the irony of the fact that Mecklenburg had gone from being one of the most progressive pro-lifers working for 'protections against sex discrimination and access to family planning' to becoming the public face of the Reagan administration's promotion of adolescent abstinence. Mecklenburg was succeeded in her HHS role by Jo Ann Gasper, who reinvigorated the pro-life assault on Title X.

On 21 January 1987, Gasper wrote to ten regional HHS directors informing them that PP's 'general support' for abortion meant it was violating the Public Health Service Act. Gasper claimed that she was supporting Reagan's agenda but she sent the letters without authorization, only alerting her superiors after the fact.[107] Later, she suggested she was actually protecting the integrity of federally funded family planning, arguing that Title X was controversial 'because it gets muddied up and muddled up with abortion', ignoring Brown's long campaign to destabilize the program.[108] The White House was quick to take credit for Gasper's initiative, circulating copies of her letter at the annual January right-to-life meeting. Opponents of abortion were 'absolutely delighted' and lavished praise on the administration.[109] They viewed it as proof that 'HHS can reform Title X without congressional action. And if we keep the pressure on, they will'.[110]

Gasper's superiors in HHS were less impressed. The letter was almost immediately rescinded, she was officially reprimanded, and her authority to administer Title X revoked. The NRLC, working in concert with Dr. James Dobson of Focus on the Family, rallied 'the troops' and the White House received almost 50,000 letters and phone calls demanding that Gasper's edict be upheld.[111] However, the distribution of Title X remained the same and Gasper's departmental punishment continued until the end of March. She briefly became a minor movement celebrity, receiving a 'standing ovation' at the June NRLC convention.[112] Emboldened, Gasper resumed her challenge, even reaching out to high-profile Congressional allies to bemoan the 'frustrating and unsatisfying situation' she faced in the federal bureaucracy.[113] For months, she refused to renew Title X grant applications for two PP affiliates. On 2 July 1987, Otis Bowen,

Secretary of HHS, fired Gasper because of her repeated insubordination. Gasper rejected this explanation, announcing at a press conference, 'I was fired because I am pro-life … I was fired because I stood up for my convictions'.[114] Anti-abortionists viewed her dismissal as 'outrageous' and called for Bowen to be replaced. In Reagan's diary, he reflected that although Gasper was a 'good person', Bowen 'had no choice' but to fire her.[115]

As complaints poured into the White House, some of Reagan's advisors suggested hosting a special event to appease right-to-lifers. Although Reagan had discussed his opposition to abortion many times, according to Carl Anderson, Special Assistant to the President for Public Liaison, this would be his 'first major Presidential address on the prolife issue'.[116] The day before the gathering, a call for tough new Title X regulations was added to the President's speech by staff in the Office of Policy Development. They were included without input or consultation; Reagan was 'simply presented with a final text that included the new measures'. Communications Director Tom Griscom expressed the only White House hesitation about the changes, namely that since they were so 'simple' it might prompt people to wonder, 'Why hadn't the White House ordered them before?'[117]

On 30 July 1987, the White House hosted a morning assembly of almost 200 pro-life leaders and members of Congress, culminating in a rousing 20-minute speech by the President. To sustained applause, Reagan announced that his administration would 'immediately' pursue new guidelines to prevent counseling and referrals for abortion, require physical and financial separation between abortion and family planning services, and prohibit groups that advocated for or promoted abortion from receiving federal funds. Reagan was breaking with almost a decade of precedent mandating that non-directive pregnancy counseling had to include discussion of abortion and referrals to abortion providers. Reagan repeated the pro-life claim that in its current form, Title X 'fosters the view that abortion is an acceptable and government-sanctioned method of family planning'.[118] Neither Brown, Mecklenburg, or Gasper were part of the largest right-to-life gathering ever hosted by the Reagan administration.[119]

In February 1988, HHS introduced the new regulations. Abortion rights supporters quickly dubbed them the 'gag rule', pointing out the implications for free speech and the parallels with the Mexico City Policy (which was known as the 'global gag rule'). The regulations were widely criticized by public health officials and medical experts and only 27% of Americans supported them.[120] However, pro-lifers and the Religious Right celebrated the new rules, framing them as a crucial part of Reagan's legacy on abortion.[121] In *USA Today*, Brown wrote approvingly about the likely impact of the regulatory change, but unlike the NRLC and other national pro-life activists, she refused to praise Reagan. Instead, she ended her column by asking, 'Why did it take the president seven years to bring the worms out of the woodwork?'[122]

Ultimately, the Title X rules were only in effect for one month in 1992. A preliminary injunction and legal challenge initially prevented their implementation. In May 1991, the Supreme Court upheld the constitutionality of the regulations in *Rust v. Sullivan*, but Republicans in the legislative and executive branches were an impediment to Reagan's Title X legacy. Representative John Porter (R-IL) and Senator John Chafee (R-RI) twice successfully added anti-gag rule amendments to key legislation. President Bush vetoed their amendments but also insisted on altering the regulations, declaring that his administration would 'not be in the business of "gagging" doctors'. During the 1992 election the

Bush administration rushed to introduce the modified rules, and on 3 November, the US Circuit Court of Appeals ruled that it had acted illegally.[123] Democrat Bill Clinton's electoral victory on the same day seemingly spelt the end of Reagan's Title X reforms.

## Conclusion

For most of Reagan's presidency, Judie Brown's campaign against Title X appeared to be a failure. After an initial cut, the Title X budget grew. Audits, although destabilizing, did not reveal wrongdoing. The provision of family planning services to minors continued without parental notification or consent requirements. Regulatory language mandated that pregnancy counseling include information about all legal options. When Reagan finally acted in 1987, he inadvertently revealed just how easy it would have been for his administration to have fundamentally altered the landscape of family planning provision. By requesting new regulatory language only at the end of his presidency, he ensured that someone else would oversee their implementation.

Brown's arguments lay at the heart of the Reagan regulations and helped frame Title X and family planning as legitimate targets for opponents of abortion, but neither the movement or the administration acknowledged her. Nevertheless, her campaign reveals important insights into the history of conservatism in the 1980s. Because Brown was disappointed by the Reagan administration, she experimented with new types of rhetoric and argument. By cloaking her goals in the language of social science, public health, policy compliance, and economic conservatism, she offered a model for socially and religiously conservative Americans wishing to present themselves as advancing a secular agenda. Her story, along with that of Mecklenburg and Gasper, also casts light on the underexplored role played by conservative women in shaping American policy debates, the strategies that they used to advance their agenda, and the ways in which they were neglected by the administration even as they feminized controversial elements of Reagan's socially conservative agenda.

Brown's legacy, and the strategies and rhetoric she experimented with, have special resonance for contemporary politics. In July 2015, a right-to-life group released several hidden-camera videos purporting to show PP selling fetal tissue for profit. This sparked a renewed wave of conservative attempts to prevent the group from accessing tax-payer dollars. At a national level, Republicans in the House of Representatives have tried various gambits, sometimes proposing to eliminate all Title X funding or working to let individual states deny family planning grants to PP. Trump's reintroduction of the Reagan regulations occurred after years of conservative assaults on PP and Title X. But Title X represents only a tiny fraction of the federal dollars that PP receives, with almost 75% coming from the Medicaid program. PP is one of the major providers of reproductive and sexual health care for low-income Americans, offering STI screening, contraceptives, maternal health care, prenatal screening, and cancer screening.[124] At the state and federal level, Republicans have sought to prevent PP from receiving any Medicaid funds to provide these services. PP has become such a priority for Congressional Republicans that on several occasions in the 2010s they have threatened to shut down the government to prevent it from accessing tax dollars. Defunding, delegitimizing, and destabilizing PP is now central to both Republican and anti-abortion strategy, a key staging ground in America's contemporary culture wars.

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## Notes

1. Although both sides of the abortion debate challenge the terminology used by their opponents, in this article I follow the self-identification of the movements in the 1980s, referring to opponents of legal abortion as 'pro-life', 'right-to-life', and 'anti-abortion', and supporters of legal abortion as 'pro-choice' and advocating for 'reproductive rights'.
2. Calvin Freiburger, 'Trump May Deny Planned Parenthood $50M+ per Year in Title X Funding: Report', *Life Site*, 1 May 2018; Marjorie Dannenfelser et al. to Alex Azar, 1 May 2018, https://www.sba-list.org/wp-content/uploads/2018/05/Prolife-Groups-Coalition-Letter-to-Sec-Azar-on-Title-X.pdf.
3. Ariana Cha, 'Trump Administration's Abortion "Gag Rule" Can Take Effect, Court Rules', *Washington Post*, June 20, 2019.
4. Daniel Williams, *Defenders of the Unborn*: *The Pro-Life Movement Before Roe v. Wade* (New York: Oxford University Press, 2016); Mary Ziegler, *After Roe*: *The Lost History of the Abortion Debate* (Cambridge: Harvard University Press, 2015). For work on ideology and beliefs, see Cynthia Gorney, *Articles of Faith: A Frontline History of the Abortion Wars* (New York: Simon and Schuster, 1998); Kristin Luker, *Abortion and the Politics of Motherhood* (Berkeley: University of California Press, 1984); Carol Mason, *Killing for Life: The Apocalyptic Narrative of Pro-Life Politics* (Ithaca, NY: Cornell University Press, 2002); Ziad Munson, *The Making of Pro-Life Activists* (Chicago: University of Chicago Press, 2008). For work on grassroots activism, which often focuses on violent and confrontational tactics, see Alesha Doan, *Opposition and Intimidation: The Abortion Wars and Strategies of Political Harrassment* (Ann Arbor: University of Michigan Press, 2007); James Risen and Judy Thomas, *Wrath of Angels: The American Abortion War* (New York: Basic Books, 1997). An older body of work focuses on the relationship between Reagan and the right-to-life movement, but this tended to be written by journalists or political scientists and starts from the assumption that anti-abortionists were natural bedfellows with the New Right and Religious Right, see Barbara Hinkson Craig and David O'Brien, *Abortion and American Politics* (Chatham, NJ: Chatham House, 1993); Michele McKeegan, *Abortion Politics: Mutiny in the Ranks of the Right* (New York: Free Press, 1992); Connie Paige, *The Right to Lifers: Who They Are, How They Operate, Where They Get Their Money* (New York: Summit Books, 1983); Rosalind Petchesky, *Abortion and Woman's Choice: The States, Sexuality, and Reproductive Freedom* (Boston, MA: Northeastern University Press, 1984).
5. Robert Self, *All in the Family: The Realignment of American Democracy Since the 1960s* (New York: Hill and Wang, 2012); Seth Dowland, *Family Values and the Rise of the Christian Right* (Philadelphia: University of Pennsylvania Press, 2015); J. Brooks Flippen, *Jimmy Carter, the Politics of Family, and the Rise of the Religious Right* (Athens: University of Georgia Press, 2011); Gil Frank, 'Save our Children: The Sexual Politics of Child Protection in the United States, 1965–1990' (PhD thesis, Brown University, 2009). For broader work historicizing family values rhetoric and organizing, see Matthew Lassiter, 'Inventing Family Values' in *Rightward Bound: Making America Conservative in the 1970s*, ed. Bruce Schulman and Julian Zelizer (Cambridge, MA: Harvard University Press, 2008), 13–28; Marjorie Spruill, *Divided We Stand: The Battle Over Women's Rights and Family Values that Polarized American Politics* (New York: Bloomsbury, 2017).
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