

TO: Senate President Ben Albritton and House Speaker Daniel Perez

FROM: Andrew Shirvell, J.D.
Founder and Executive Director of Florida Voice for the Unborn

Trudy Perez-Poveda
Director of Family for LIFE

DATE: November 17, 2025

RE: Memo Requesting the Legislature Take Action Concerning the Agency for Health Care Administration's Lax Oversight of Florida's Abortion Facilities

We believe the Agency for Health Care Administration (hereafter "AHCA") has not been engaging in proper supervision of abortion facilities. Our state's statutory prohibition of abortions after six-weeks' gestation (with some exceptions) took effect on **May 1, 2024**.¹ While it is true that the annual number of Florida abortions decreased in 2024, the number of abortions taking place at six-weeks' gestation or less appear to have dramatically risen **from May 2024 through December 2024**. Even accounting for women who are now obtaining abortions earlier in their pregnancies than they ordinarily would have, the increase in reported abortions at six-weeks' gestation or less is so significant as to suggest that abortion facilities are likely committing violations of Florida law by underestimating the age of the child in the womb or completely ignoring the statute. Therefore, we are calling upon the Legislature to remedy the situation by holding AHCA accountable.

I. BACKGROUND

Headquartered in Tallahassee with thousands of grassroots pro-life supporters throughout the state, **Florida Voice for the Unborn** is a nonprofit corporation that exists to positively influence laws and regulations that affect, directly and indirectly, the lives of all Unborn human beings, from the moment of conception onward.²

Based in Jacksonville and heavily engaged in sidewalk counseling outside the city's abortion centers, **Family for LIFE** is a movement of Christians, united as one voice in the defense of the Unborn, acting *only* in a peaceful, prayerful, legal and loving manner.³

AHCA is the state agency charged under Florida statutes with regulating abortion centers, which includes licensing and inspecting facilities; collecting required data about abortions performed; and submitting an annual report to the Senate President and Speaker of the House of Representatives regarding all of the above.⁴

¹ See: Section 390.0111 of the Florida Statutes

² See: <https://floridavoicefortheunborn.com/>

³ See: <https://www.familyforlife.info/>

⁴ See: Sections 390.011 through 390.025 of the Florida Statutes

On August 28, 2025, the life-affirming **Charlotte Lozier Institute (CLI)** published a report online, entitled, “Abortion Reporting: Florida (2024),” in which the report’s authors thoroughly documented the state’s abortion trends based largely – but not entirely – on a full set of data that they obtained from AHCA earlier that month (after waiting six months from when they first issued their request).⁵

II. THE PROBLEM

In **2023**, AHCA reported that a total of **84,052 abortions** were performed in the state, from January 1st through December 31st.⁶ It further reported that of that total, **33,453** were conducted when the baby in-utero was determined to be at six-weeks’ gestation or less.⁷ Thus, for 2023, abortions at six-weeks’ gestation or less comprised **~40%** of the total number of abortions.⁸

In **2024**, AHCA reported that the total number of abortions performed from January 1st through December 31st was **64,854**.⁹ It also reported that **43,690** of these abortions took place when the unborn child was determined to be at six-weeks’ gestation or less.¹⁰ Accordingly, for 2024, abortions at six-weeks’ gestation or less amounted to **~67%** of the total.¹¹ That represents a **~27%** increase over 2023.

Florida’s abortion facilities only operate in sixteen of Florida’s sixty-seven counties: Collier, Osceola, Duval, Seminole, St. Lucie, Alachua, Leon, Polk, Orange, Broward, Pinellas, Sarasota, Lee, Hillsborough, Miami-Dade, and Palm Beach. (Planned Parenthood has abortion facilities in twelve of the counties.)¹²

AHCA assembles monthly reports of abortions performed in each of those sixteen counties. AHCA has provided Family for LIFE with each monthly report for the eight-month period of May 1st through December 31st – pertaining to both 2023 and 2024.¹³

As illustrated in the table on page 3 of this memo, if one compares the eight-month period in 2024 in which the prohibition on most abortions after six-weeks’ gestation became effective (i.e., from May 1st through December 31st), to the same eight-month period in 2023 (i.e. May 1st through December 31st), an unexpected variance occurs.

One would expect that the percentage of abortions maintained in each of the provider counties would be around **40%-to-50%** of the **2023** numbers, given that abortions at six-weeks’ gestation or less comprised **~40%** of the total number of statewide abortions in **2023**.

⁵ CLI’s entire 9-page report can be found here: <https://lozierinstitute.org/abortion-reporting-florida-2024/>

⁶ See: <https://ahca.myflorida.com/content/download/22078/file/TrimesterByReason.pdf>

⁷ See: <https://lozierinstitute.org/abortion-reporting-florida-2024/> at page 3

⁸ *Id.*

⁹ See: <https://ahca.myflorida.com/content/download/24204/file/TrimesterByReason.pdf>

¹⁰ See: <https://lozierinstitute.org/abortion-reporting-florida-2024/> at page 3

¹¹ *Id.*

¹² See Family for LIFE’s “2023-2024 Florida Abortion Analysis with Hypothesis,” available online here: <https://drive.google.com/file/d/1vysCZFR7haLdEF6qEMmHD7HjvTtXnkA/view?usp=sharing>

¹³ See AHCA Monthly Provider Reports, May 2023 – December 2023 and May 2024 – December 2024, available online here: https://drive.google.com/file/d/1u8tu_Om79G2KYSegb37qupiperhfsfPM/view?usp=sharing

Yet, as the table below demonstrates, ten of the sixteen provider counties show that the percentage of abortions performed in **2024** was **well-over 50%** – with three counties showing that they maintained an astounding **70%** of abortions in **2024 vis-à-vis 2023**.

Total Florida Abortion Numbers			
County	<u>May 1st - Dec. 31st, 2023</u>	<u>May 1st - Dec. 31st, 2024</u>	<u>Percentage of Abortions Maintained in 2024 vis-à-vis 2023</u>
Collier	295	25	8%
Osceola	166	0	0%
Duval	5546	2427	44%
Seminole	2376	1096	46%
St. Lucie	594	280	47%
Alachua	2035	973	48%
Leon	3056	1632	53%
Polk	1254	721	57%
Orange	4953	2980	60%
Broward	6130	3800	62%
Pinellas	2295	1502	65%
Sarasota	1079	699	65%
Lee	1459	1009	69%
Hillsborough	6358	4453	70%
Miami-Dade	11940	8349	70%
Palm Beach	4354	3068	70%
TOTAL	53,890	33,014	61%

Despite Florida’s prohibition on most abortions after six-weeks’ gestation, it appears that most of our state’s abortion facilities are continuing to perform abortions at a very high level. One likely explanation for the exceptional variance between the expected percentage (**40%-to-50%** of the **2023** numbers) and the actual percentage of **well-over 50%** in ten of the provider counties is that the abortion providers are purposely underestimating or ignoring the actual gestation of the baby in-utero beyond the six-week limit as prescribed by law. Such purposeful acts would constitute clear violations of Florida’s post-six-week abortion prohibition. (And there is circumstantial evidence that abortionists affiliated with Planned Parenthood, in particular, could be violating the statute because the organization uses a definition of pregnancy that is at odds with Florida law.¹⁴)

¹⁴ See: <https://www.plannedparenthood.org/learn/pregnancy>

At the very least, AHCA should urgently investigate this matter. However, grassroots pro-life advocates from around the state have been frustrated with AHCA's general unresponsiveness to this and other matters brought to its attention regarding the Florida abortion industry. Family for LIFE's "2023-2024 Florida Abortion Analysis with Hypothesis" was hand delivered to employees of AHCA's Division of Health Quality Assurance during a scheduled private meeting in Tallahassee on April 24, 2025. To date, there has been no word about any remedy to this situation or addressing the possibility of many felonies which may have been committed.

III. THE PROPOSED SOLUTION

We believe the Legislature has the duty and power to hold AHCA accountable and remedy the problem described above. If AHCA were to conduct a proper investigation, it could uncover the abortion industry's scheme to commit thousands of illegal abortions in violation of state law, resulting in possible criminal referrals and future Unborn lives saved. However, in order to force AHCA to act, the Legislature must shine a light on the problem. We recommend that the Legislature conduct one or more public hearings on this matter, at which AHCA officials could be questioned and other public testimony taken. Such public hearings could be conducted separately or jointly by each legislative chamber through its regular committees or via a specially-created committee. Due to the urgency of this matter, we advise that such a process begin at the earliest opportunity. And upon request, further documentation supporting the allegations contained in this memo will be provided to those legislators in-charge of any public hearings. Thank you for your timely consideration.