Reproductive Health *and* Freedom Watch

Memo

TO: Interested Parties
DATE: November 13, 2025
RE: Unregulated Pregnancy Clinic Industry Nearing $2 Billion in Annual Revenue

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Data from FY 2023 Forms 990 reveal that the unregulated pregnancy clinic (UPC) industry amassed $1.9 billion in revenue—driven largely by a mix of public and private grants—marking an 11 percent increase over FY 2022's $1.7 billion. Yet, despite this surge in funding, the industry's own reports show that the number of clients served has remained virtually unchanged since 2017[1], underscoring a widening gap between financial growth and measurable impact.

In February 2024, Reproductive Health and Freedom Watch (RHFW) released the first-ever comprehensive analysis of UPC industry finances. Now, with an expanded dataset of FY 2023 IRS Forms 990 for 1,687 UPC tax identification numbers (EINs) – which we estimate represents approximately 2,125 physical UPC locations – this memo provides updated financial data for the industry, including projections through 2025 and recommendations to increase financial transparency.

Key Findings

1. **UPC industry revenue is projected to top $2.5 billion in 2025.**
2. **State legislatures have directed over $820 million to UPCs since 2021, despite predominate private financing.**
3. **UPCs appear to provide fewer services dollar for dollar than nonprofit free community health clinics.**
4. **96% of voters support accountability for taxpayer dollars appropriated to UPCs.**

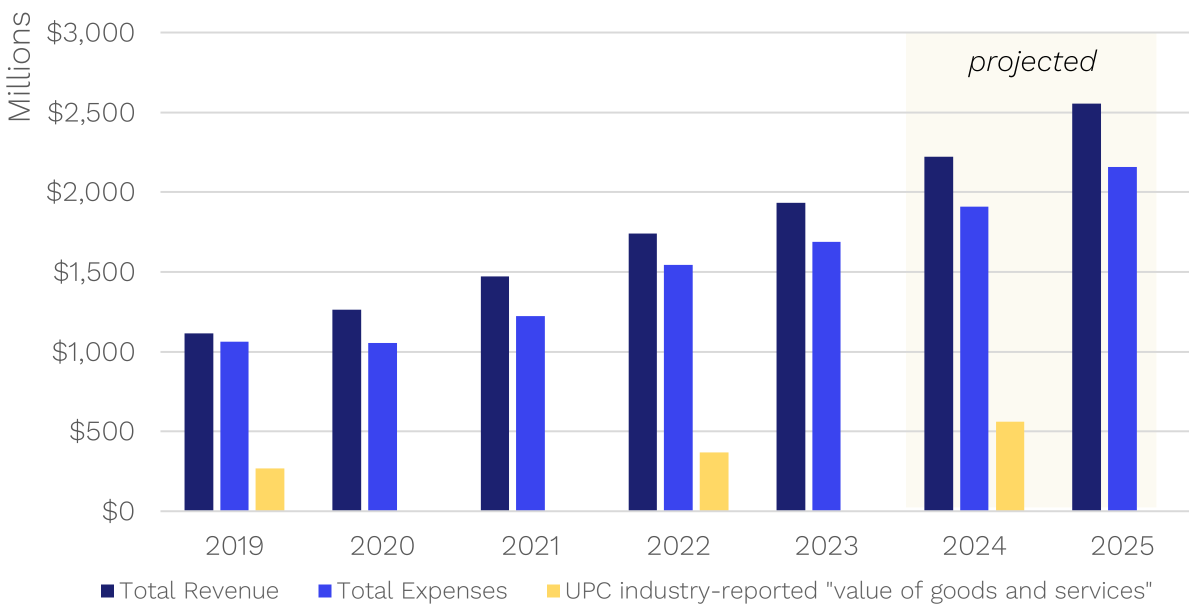
I. Findings

1. UPC INDUSTRY REVENUE IS PROJECTED TO TOP $2.5 BILLION IN 2025.

- In 2023, Form 990 data from 1,687 UPC EINs showed over $1.9 billion in revenue, over $1.7 billion in expenses, and over $2.4 billion in assets. This represents a 5-year 42% increase in revenue and 37% increase in expenses over the industry's 2019 financial figures.

- For 2025, RHFW projects the UPC industry will report revenue over $2.5 billion and expenses over $2.1 billion.
    - RHFW bases its 2025 projections on average year-over-year increases of 15% and 13% between 2019 and 2023 for revenue and expenses respectively.
    - For 2024, RHFW projects the UPC industry will report revenue over $2.2 billion and expenses over $1.9 billion.

Figure 1: UPC revenue and expenses as reported on Forms 990 with UPC industry-reported "value of goods and services", 2019-2023 with projected values, 2024-2025



See Appendices A-E for additional state-specific data including revenue, expenses, and personnel counts by state as reported on available Forms 990.

2. STATE LEGISLATURES HAVE DIRECTED OVER $820 MILLION TO UPCs SINCE 2021 DESPITE PREDOMINATE PRIVATE FINANCING.

According to information available on federal Forms 990 filed by UPCs in our dataset and foundations that report grants to UPCs on Forms 990, the majority of UPC industry funding appears to be derived from private sources. As in past years, the top private donors that have disclosed grants to the UPC industry on their Forms 990 are largely donor advised funds (DAFs), which serve as vehicles for anonymous private donors, and conservative and/or Christian funders such as National Christian Charitable Foundation or Mission Pre-Born. For the top 25 private funders by number of grants given to UPCs in 2023, see Appendix F.

Taxpayer funding to the UPC industry continues to rise. Between 2021 and 2025, RHFW found 22 state legislatures appropriated over $820 million[2] of taxpayer dollars directly to the industry.

- During the 2025 legislative cycle alone, 16 state legislatures directly appropriated over $300 million[2] in taxpayer funding to the UPC industry – the most ever appropriated by state legislatures in a single year and a 20% increase over the total appropriated by state legislatures in 2023, the next highest year.
- Texas continues to appropriate the most funding to UPCs: a record $180 million for the FY2025-27 biennium, and $420 million since 2021.
- In 2025 Alabama became the newest state to appropriate taxpayer funding to the UPC industry, establishing a UPC funding program with an initial appropriation of $850,000.[3] See figure 2 for more detail.

To expand access to taxpayer funding from multiple sources, the UPC industry has also strategically advocated for targeted tax incentives that redirect state resources—funds otherwise available for public priorities such as education, health care, transportation, and assistance for low-income families—toward UPCs. These incentives typically take the form of tax credits for individuals or corporations who donate to UPCs, sales tax exemptions for the UPCs themselves, or other mechanisms that effectively reduce state tax revenue to subsidize UPC operations.

National anti-abortion policy advocacy organization Susan B. Anthony Pro-Life America identified the expansion of tax credits for individuals and businesses that donate to UPCs as one of its top five legislative priorities for 2024[4], and in 2025 RHFW tracked over 15 proposals in 11 states to introduce or expand state tax incentives for donations to the UPC industry. There is limited data on the impact of these tax incentives, but a ProPublica investigation in Missouri found that when the state removed its UPC tax credit cap, funding to the industry through the tax credit program tripled -- topping $7 million -- in just the first quarter.[5]

Figure 2: State legislative appropriations to the UPC industry, 2021-2025

	2021	2022	2023	2024	2025	Total (2021-2025)
Alabama					$850,000	**$850,000**
Arizona	$1,500,000					**$1,500,000**
Arkansas		$1,000,000	$1,000,000	$2,000,000	$2,000,000	**$6,000,000**
Florida	$4,500,000	$4,450,000	$29,500,000	$29,966,200	$30,136,000	**$98,552,200**
Georgia	$2,000,000	$2,000,000	$2,000,000	$2,250,000	$2,000,000	**$10,250,000**
Iowa		$1,000,000		$1,000,000		**$2,000,000**
Indiana^	$500,000	$2,000,000	$7,000,000		$7,600,000	**$17,100,000**
Kansas			$2,000,000	$2,000,000	$3,677,692	**$7,677,692**
Louisiana	$1,260,000	$1,260,000	$2,260,000	$5,700,000	$4,425,000	**$14,905,000**
Minnesota	$3,357,000	$3,357,000				**$6,714,000**
Missouri	$6,458,561	$6,458,561	$8,383,561	$8,383,561	$12,533,561	**$42,217,805**
North Carolina^	$12,583,341		$15,500,000		$12,050,000*	**$40,133,341**
North Dakota	$2,100,000		$1,000,000			**$3,100,000**

Ohio^	$6,000,000		$14,000,000		$25,000,000	**$45,000,000**
Oklahoma		$3,000,000	$0	$18,000,000	$18,000,000	**$39,000,000**
Pennsylvania	$7,263,000	$7,263,000	$7,263,000			**$21,789,000**
South Carolina		$2,450,000	$2,400,000	$2,400,000	$2,400,000	**$9,650,000**
Tennessee	$3,000,000		$20,000,000	$3,050,000	$1,000,000	**$27,050,000**
Texas^	$100,022,732		$140,000,000		$180,000,000	**$420,022,732**
Utah				$645,000	$500,000	**$1,145,000**
West Virginia			$1,000,000	$3,000,000	$3,000,000	**$7,000,000**
Wisconsin			$138,000			**$138,000**
TOTAL	**$150,544,634**	**$34,238,561**	**$253,444,561**	**$78,394,761**	**$305,172,253**	**$821,794,770**

^State appropriates funding biannually, for 2-year periods, on odd numbered years.
*RHFW still confirming final 2025 appropriation amount as of November 2025.

Case Study: Florida Pregnancy Care Network
In FY 2023–2024, the Florida Legislature appropriated $29.5 million to the Florida Pregnancy Care Network (FPCN), whose latest impact report[6] raises several questions about the use of taxpayer funds:

1. The report omits itemized details for 90% of FPCN's expenses across its four largest cost centers: "Promotional Campaign", "Pregnancy Services", "Other", and "Mobile Units". What services fall within these categories, and why are mobile unit expenses reported separately?
2. How many subcontracted UPCs received state funds through FPCN in FY 2023–2024, and how much did each receive?
3. Has FPCN conducted or commissioned any independent evaluation of health outcomes among clients served?
4. Why does FPCN's impact report lack itemized financial or programmatic data that would allow independent verification?
5. Are client numbers verified or audited by an external entity, or are they self-reported by UPC grantees?

3. UPCS APPEAR TO PROVIDE FEWER SERVICES DOLLAR-FOR-DOLLAR THAN NONPROFIT FREE COMMUNITY HEALTH CLINICS.

Some UPCs publish detailed annual reports that include data on the number of unique clients served and the services offered, providing a rare glimpse into their scope, reach, and operational priorities. Yet, when this self-reported UPC data is compared to that of nonprofit free community clinics operating in the same states, a stark disparity emerges: UPCs appear to spend substantially more per client while providing far fewer and less comprehensive services. See figures 3 and 4 for two case studies from Florida and Indiana, respectively.

Figure 3: Comparison between First Coast Women's Services (Florida-based UPC) and Lakeland Volunteers in Medicine (Florida-based nonprofit free health clinic)

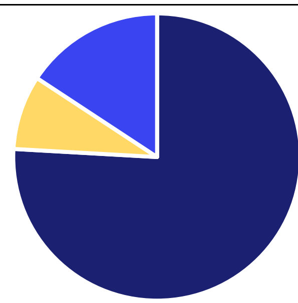
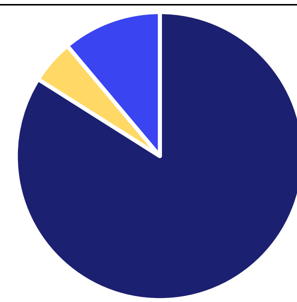
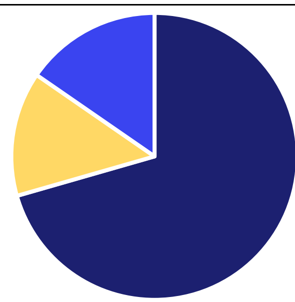
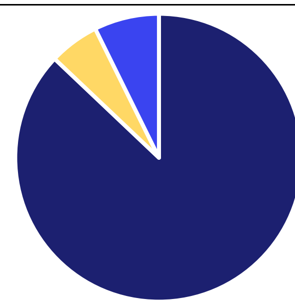
	Unregulated Pregnancy Clinic	**Nonprofit Free Health Clinic**
Facility Name	First Coast Women's Services[7] [8]	Lakeland Volunteers in Medicine[9] [10]
City	Jacksonville, FL	Lakeland, FL
Services	• Pregnancy Test • Non-diagnostic, limited ultrasound • Pregnancy Options Consultation • STD Testing • Parenting Classes	• Primary medical care • Diagnostics (ultrasound, x-ray, CT/MRI, lab services, pathology) • Pharmacy • Dental Care • Mental Health Services • Vision Care • Food Pantry
2022 Revenue (Form 990)	$3,320,601	$3,970,657
2022 Expenses (Form 990)	$2,027,883	$2,347,534
Reported value of goods and services	$1,955,933	$8,022,382
# Clients Served (2022)	3,439	20,087[11]
Cost per client	$590	$116
2022 Expenses breakdown (Form 990)		
	Program Administration Fundraising	

Figure 4: Comparison between Clarity of South Central Indiana (Indiana-based UPC) and Trinity Free Clinic (Indiana-based nonprofit free health clinic)

	Unregulated Pregnancy Clinic	**Nonprofit Free Health Clinic**
Facility Name	Clarity of South Central Indiana [12] [13]	Trinity Free Clinic [14] [15]
City	Columbus, Indiana	Carmel, Indiana
Services	• Pregnancy Test • Non-diagnostic, limited ultrasound • Pregnancy Options Consultation • STD Testing • Parenting Classes	• Pregnancy test • Breast exam • Mammogram screenings • Pap testing • Minor illness • Minor injury • Dermatology • Wellness exams • Asthma and allergy • Pediatrics • Vision care • Dietary and nutrition • Physical therapy • Hypertension • Podiatry • Dental care
2023 Revenue (Form 990)	$2,955,778	$1,378,050
2023 Expenses (Form 990)	$2,492,019	$1,332,925
# Clients Served (2023)	3,696	7,331
Cost per client	$674	$182
2023 Expenses breakdown (Form 990)		
	Program	Management Fundraising

4. 96% OF VOTERS SUPPORT ACCOUNTABILITY FOR TAXPAYER DOLLARS APPROPRIATED TO THE UPC INDUSTRY.

Polling from Global Strategy Group found 96% of voters believe organizations receiving tax dollars should be required to account for how they spend them. As UPC-allied state legislatures appropriate increasing taxpayer funds to support the already-wealthy UPC industry, we must demand transparency around how legislatures determine UPC funding is needed and accountability for how taxpayer dollars are spent.

II. Recommendations

During the 2025 legislative cycle, several states advanced legislation to increase transparency about how much taxpayer money is granted to the UPC industry, which entities receive it, and how it is spent. Notable examples include:

- **Arkansas SB 1202**, which includes a provision requiring the Department of Finance and Administration to report to the legislature the amount of funding given to UPCs in the state and the purpose of each grant awarded.[16] Such reporting will allow legislators to better understand health care service gaps in the state. Passed into law, this represents the first financial transparency reporting requirement for UPCs in the state.
- **Texas HB 2581**, which – had it been passed into law – would have required UPCs receiving state funding to report the date, time, type, and location of each client interaction; the name of the employee providing said service; and an itemized list of each service, material item, or referral provided in each client interaction.[17]

Future legislation should strive to:

1. **Clarify**. Ensure the state budget clearly outlines the total funds allocated to the UPC industry.
2. **Inquire**. Leverage legislative authority to demand copies of the documents UPCs submit with their grant proposals and reports, including complete organizational financials and details regarding services provided or offered, to assess the validity of funding requests.
3. **Disclose**. If state agencies don't currently require a full financial disclosure from the UPCs receiving taxpayer funding, introduce budget language to mandate it.

The UPC Policy Playbook, created by Public Leadership Institute, includes a model Financial Transparency Act that can be tailored to a state-specific context. The model bill provides language for legislators seeking to develop stronger reporting requirements for UPCs and increased transparency for public funding in their state.

Private foundations and individual donors considering funding UPCs as part of a commitment to aiding low-income, marginalized pregnant women should ensure their application process requires the submission of full financial statements, detailed budgets, and verified data. This should include the number of clients served, the list of services provided, and the total cost per service. These measures will allow funders to make more informed and effective investment decisions.

Sources and methodology: The UPC financial data in this report comes from publicly available Forms 990; Charlotte Lozier Institute et al. data comes from reports publicly available at https://lozierinstitute.org/pcr. Projections were calculated using the average year-over-year percent increase. See the full dataset and methodology at UPCFinanceWatch.com.

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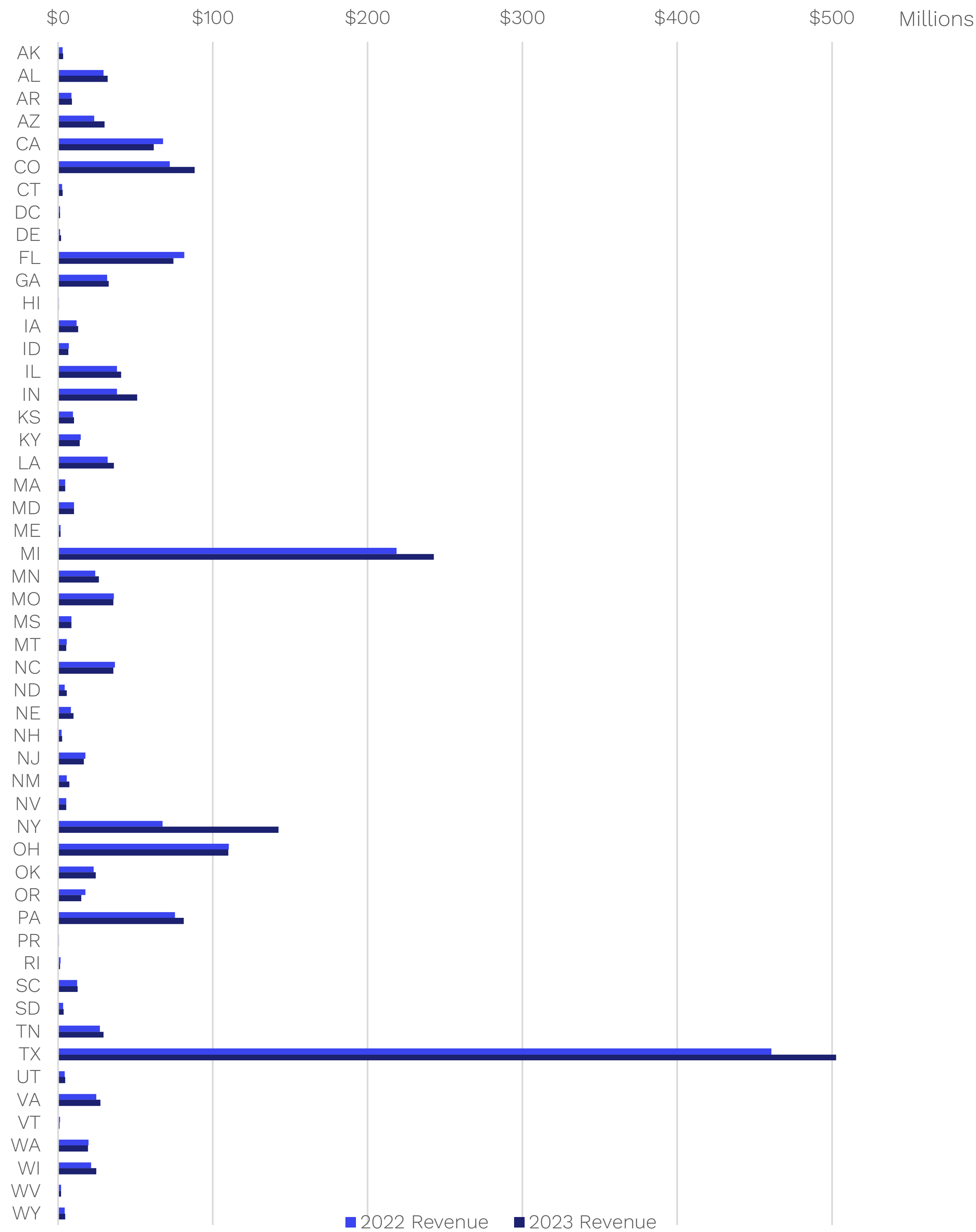
Appendix A: Total UPC count, revenue, expenses, staff count, and volunteer count per state for FY 2023 as reported on available Forms 990

State	# UPCs with 2023 data	Total Revenue	Total Expenses	Total Staff	Total Volunteers	Total Personnel
AK	8	$3,097,828	$2,460,965	42	222	264
AL	45	$31,865,595	$30,817,013	532	552	1084
AR	24	$8,780,404	$7,758,463	194	327	521
AZ	22	$30,104,432	$27,320,628	430	3423	3853
CA	113	$61,780,656	$56,573,755	960	2464	3424
CO	34	$88,081,976	$72,457,700	1221	4471	5692
CT	9	$2,868,220	$2,580,397	49	110	159
DC	2	$1,089,244	$730,534	19	147	166
DE	5	$1,765,471	$1,300,152	19	69	88
FL	81	$74,403,999	$63,180,706	1095	2501	3596
GA	59	$32,804,213	$29,031,182	563	1274	1837
HI	4	$544,263	$487,423	11	23	34
IA	30	$13,093,295	$11,229,943	210	747	957
ID	12	$6,657,096	$5,696,896	113	466	579
IL	52	$40,862,180	$38,531,321	766	1731	2497
IN	46	$51,137,170	$34,173,613	619	2305	2924
KS	25	$10,235,861	$8,642,716	179	621	800
KY	35	$14,041,206	$13,051,961	260	796	1056
LA	26	$35,875,313	$35,494,239	598	1138	1736
MA	14	$4,675,538	$4,846,400	79	4	83
MD	30	$10,148,770	$9,546,213	245	859	1104
ME	7	$1,647,980	$1,312,050	17	35	52
MI	64	$242,598,546	$232,199,174	2904	3579	6483
MN	52	$26,167,141	$21,961,337	455	1784	2239
MO	58	$35,671,349	$29,963,895	492	1660	2152
MS	25	$8,717,637	$6,883,300	135	214	349
MT	10	$5,375,913	$3,761,794	82	142	224
NC	76	$35,688,968	$29,474,469	601	1478	2079
ND	7	$5,725,287	$3,943,613	67	175	242
NE	11	$9,925,950	$6,366,085	117	295	412
NH	10	$2,585,726	$2,317,953	62	118	180
NJ	24	$16,730,353	$17,069,696	256	758	1014
NM	16	$7,107,850	$6,292,246	166	202	368
NV	5	$5,101,376	$4,412,973	65	371	436

NY	57	$142,268,131	$59,925,787	289	559	848
OH	77	$109,858,716	$103,750,391	2300	20940	23240
OK	31	$24,408,101	$23,445,104	320	1356	1676
OR	29	$14,961,351	$13,788,228	255	2353	2608
PA	76	$81,058,255	$73,521,018	1304	2022	3326
PR	1	$704,771	$658,718	11	0	11
RI	3	$1,163,540	$1,154,030	27	56	83
SC	27	$12,581,254	$10,269,860	229	660	889
SD	8	$3,687,895	$2,729,843	54	197	251
TN	45	$29,310,521	$23,838,550	457	1436	1893
TX	145	$502,656,717	$484,138,160	2731	6426	9157
UT	6	$4,429,846	$3,799,939	60	257	317
VA	40	$27,297,304	$23,298,538	413	1761	2174
VT	6	$1,057,467	$1,057,311	15	69	84
WA	32	$19,411,418	$18,578,299	365	1094	1459
WI	44	$24,779,866	$19,148,129	323	2097	2420
WV	9	$1,956,427	$1,462,093	25	39	64
WY	10	$4,443,369	$3,549,602	85	93	178

Appendix B: UPC revenue by state as reported on available Forms 990, 2022 and 2023



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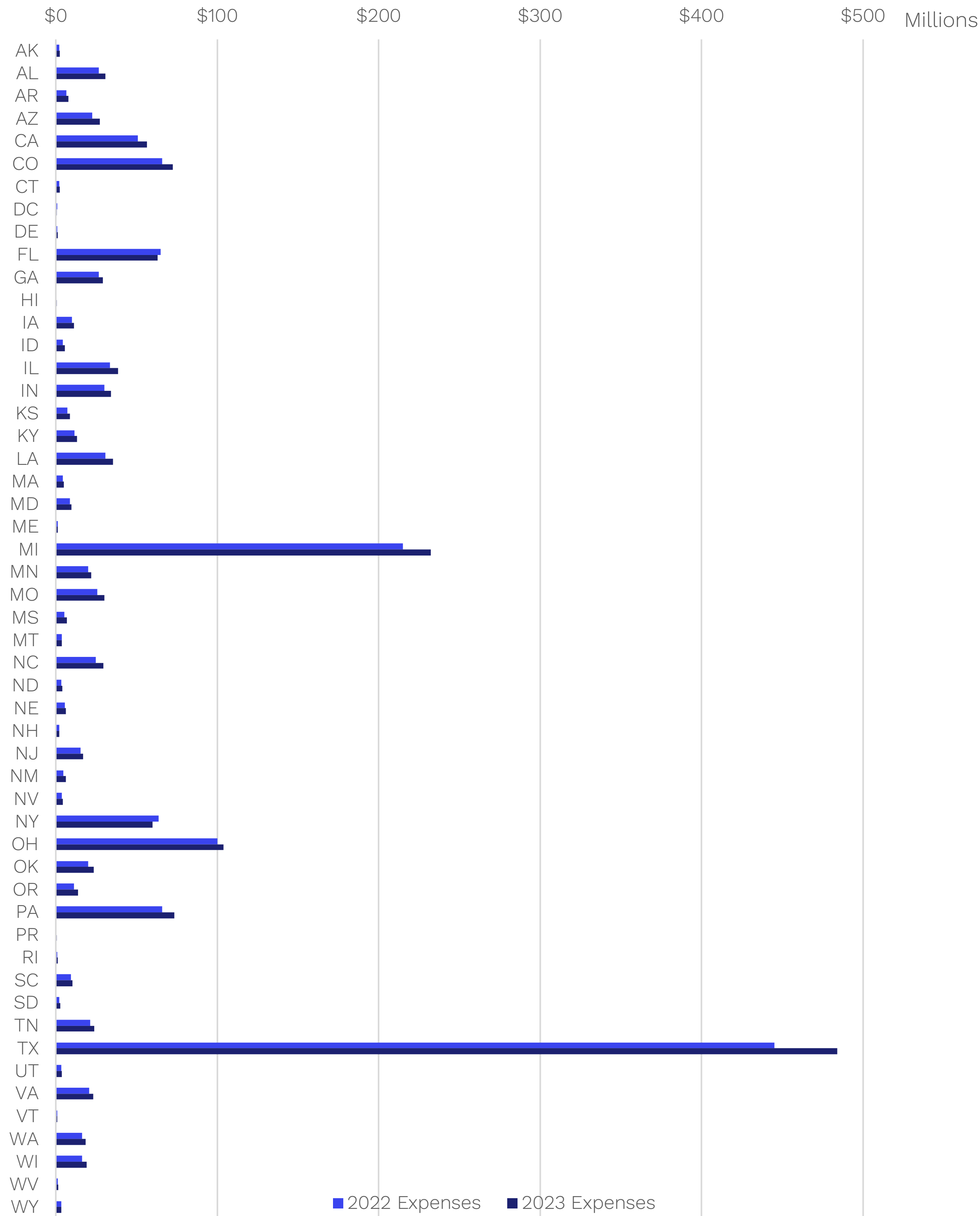
Appendix C: UPC expenses by state as reported on available Forms 990, 2022 and 2023



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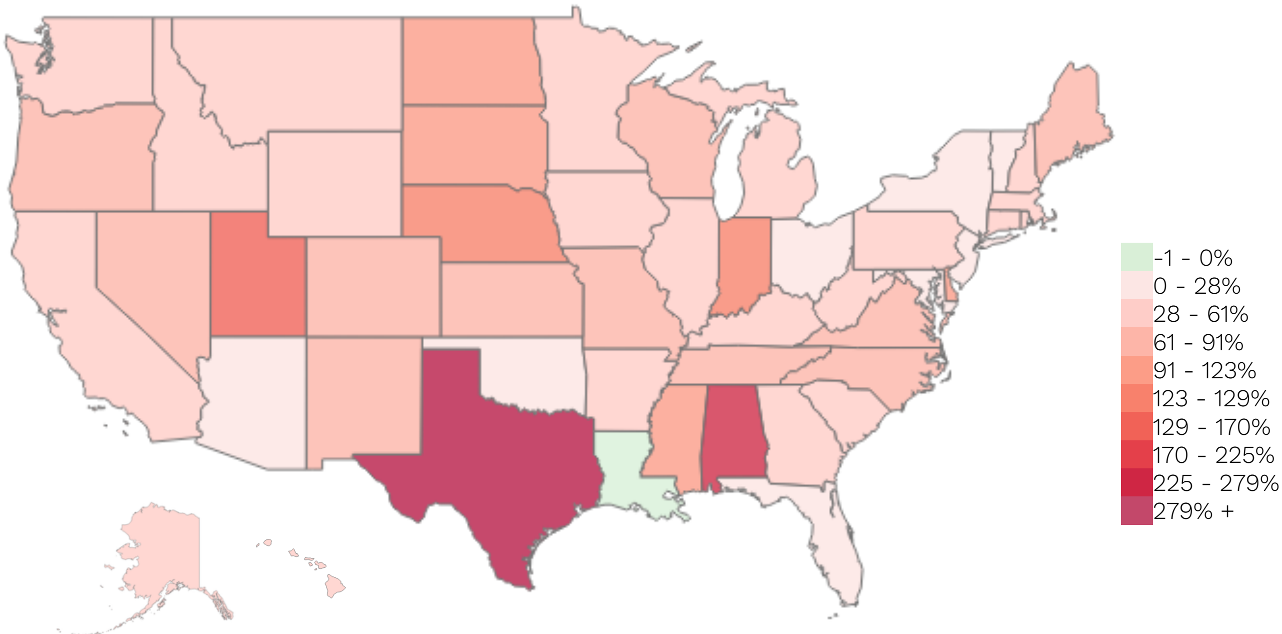
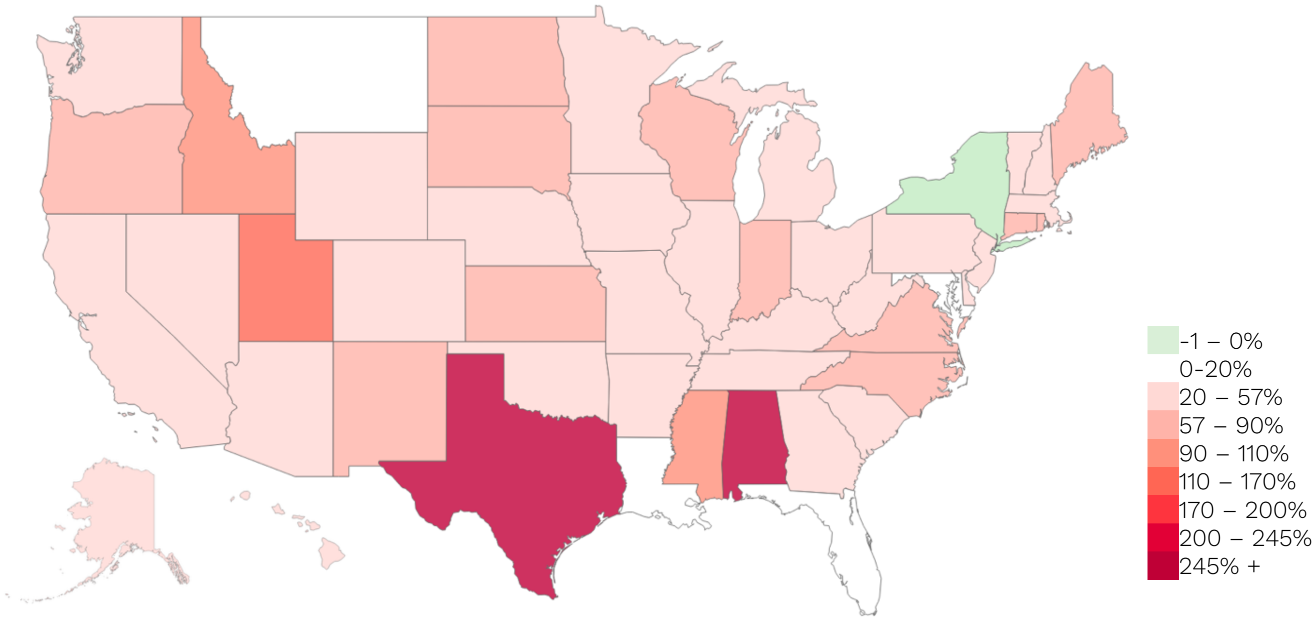
Appendix D: UPC revenue percent increase by state as reported on available Forms 990, 2019 to 2023



Appendix E: UPC expenses percent increase by state as reported on available Forms 990, 2019 to 2023



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Appendix F: Top 25 private funders of UPCs by number of grants made in 2023 with total funding given to UPCs in 2022 and 2023, as reported on available Forms 990

Foundation name	Total Funding to UPCs, 2022	Total Funding to UPCs, 2023	% Change from 2022	Number of Grants to UPCs, 2023
National Christian Foundation / Natl Christian Charitable FDN Inc	$24,595,441	$18,676,646	-24%	204
American Endowment Foundation	$3,409,345	$4,198,877	23%	157
Mission Pre-Born	$402,016	$3,370,607	738%	99
Knights of Columbus Charities	$1,891,924	$1,710,488	-10%	90
The Blackbaud Giving Fund	$1,075,434	$974,324	-9%	79
Carolina Pregnancy Care Fellowship	$3,873,314	$2,859,266	-26%	58
Raymond James Charitable Endowment Fund	$101,000	$1,545,146	1430%	45
Charities Aid Foundation of America	$182,142	$477,084	162%	40
Schwab Charitable Fund	$4,486,840	$4,339,201	-3%	39
Vanguard Charitable Endowment Program	$2,417,353	$1,873,331	-23%	39
Network for Good	$2,291,775	$2,092,201	-9%	36
The Signatry / Servant Foundation	$4,554,985	$3,601,716	-21%	36
National Philanthropic Trust	$2,984,589	$1,770,053	-41%	35
Morgan Stanley Global Impact Funding Trust	$828,500	$1,023,400	24%	35
Florida Pregnancy Care Network	$2,760,500	$2,200,866	-20%	35
American Online Giving Foundation	$926,257	$1,435,291	55%	32
The US Charitable Gift Trust	$0	$574,497	-	31
The Bank of America Charitable Foundation	$84,425	$82,540	-2%	30
WaterStone	$512,618	$868,185	69%	27
4us	$0	$915,333	-	27
Fidelity Investments Charitable Gift Fund	$7,093,065	$4,272,190	-40%	26
Pfizer Foundation	$43,578	$57,688	32%	26
Shell USA Company Foundation	$195,692	$100,358	-49%	23
Care Net	$1,070,000	$181,000	-83%	23
Alliance for Life - Missouri	$1,148,228	$1,351,236	18%	21

[1] For UPC industry-reported goods and services see https://reproductivehealthfreedom.us/wp-content/uploads/2025/11/UPC-Industry-Reported-Goods-and-Services.pdf
[2] 2025 legislative appropriations are not yet final as there are still state legislatures in active session as of November 2025. See figure 2 for more detail.
[3] https://legiscan.com/AL/bill/SB113/2025
[4] Bukuras, Joe. 2024. "Susan B. Anthony Pro-Life America Lays out Political Strategy for 2024." National Catholic Register. January 22, 2024. https://www.ncregister.com/cna/susan-b-anthony-pro-life-america-lays-out-political-strategy-for-2024-ctd4225h.
[5] Kohler, Jeremy. 2022. "How Missouri Helps Abortion Opponents Divert State Taxes to Crisis Pregnancy Centers." ProPublica. June 6, 2022. https://www.propublica.org/article/pregnancy-center-missouri-abortion-tax-credits.
[6] The Florida Department of Health. (2025). 2025 Florida Department of Health Florida Pregnancy Support and Wellness Services Program Legislative Report. https://state-reports.floridacollections.org/2023-2024-191
[7] 2022 Statistics | First Coast Women's Services. (2023, February 14). First Coast Women's Services. https://friendsoffirstcoast.org/2022stats/
[8] Department of the Treasury. (2022). Return of Organization Exempt from Income Tax (Form 990). https://www.causeiq.com/organizations/first-coast-womens-services,593200240/?from_ssb=true
[9] Lakeland Volunteers in Medicine. (n.d.). Impact Report 2022. Retrieved November 10, 2025, from https://www.lvim.net/wp-content/uploads/2023/11/2022-Impact-Report.pdf
[10] Department of the Treasury. (2023). Return of Organization Exempt from Income Tax (Form 990). https://www.causeiq.com/organizations/lakeland-volunteers-in-medicine,522351630/
[11] Total medical clinic patients plus food pantry patrons, less food pantry patients who are clinic patients
[12] Community Impact Report July 2022 - June 2023. (n.d.). Retrieved November 10, 2025, from https://claritycares.org/wp-content/uploads/2024/03/Clarity_AR-2023_updated-with-net-assets.pdf
[13] Department of the Treasury. (2023). Return of Organization Exempt from Income Tax (Form 990). https://www.causeiq.com/organizations/clarity-of-south-central-indiana,351691347/
[14] Trinity Free Clinic. (n.d.). Our Impact: 10,000+ patient visits in 2023! Trinity Free Clinic. Retrieved November 10, 2025, from https://www.trinityfreeclinic.org/impact
[15] Department of the Treasury. (2023). Return of Organization Exempt from Income Tax (Form 990). https://www.causeiq.com/organizations/trinity-free-clinic,352120420/
[16] An Act for The Department of Finance and Administration - Disbursing Officer Appropriation for The 2025-2026 Fiscal Year, no. HB1202. Retrieved November 10, 2025, from https://legiscan.com/AR/bill/HB1202/2025
[17] Relating to the information required for payment of services provided through the Thriving Texas Families Program., no. HB2581. Retrieved November 10, 2025, from https://legiscan.com/TX/sponsors/HB2581/2025