



October 18, 2019

The Honorable Suzanne Bonamici
Chairwoman
Civil Rights & Human Services Subcommittee
House Education and Labor Committee
2176 Rayburn House Office Building
Washington, DC 20515

The Honorable James Comer
Ranking Member
Civil Rights & Human Services Subcommittee
House Education and Labor Committee
1037 Longworth House Office Building
Washington, DC 20515

Dear Chairwoman Bonamici and Ranking Member Comer:

On behalf of the National WIC Association, the 12,000 service provider agencies we represent, and the approximately 7 million women, infants, and young children our members serve, we write to express our strong support for H.R. 2694, the Pregnant Workers' Fairness Act. This legislation is a critical step toward ensuring healthy pregnancies and positive birth outcomes for working mothers served by WIC.

WIC's nutrition assistance and counseling is specifically targeted to improve pregnancy and birth outcomes for expectant mothers. WIC's nutrition intervention has proven effective at reducing negative birth outcomes, particularly preterm birth and low birthweight. Negative birth outcomes can lead to lifelong health conditions, resulting in significant healthcare costs in both the short- and long-term. The average preterm birth costs \$49,033 in first-year medical expenses, compared to a mere \$4,551 for an uncomplicated birth.¹ Preterm births alone are estimated to cost employers more than \$12 billion in additional healthcare spending each year.²

The Pregnant Workers' Fairness Act includes a reasonable accommodations framework for pregnant workers that is necessary to reduce health risks to both mother and baby. Certain physical tasks, such as heavy lifting or standing for long periods of time, could significantly increase the likelihood of preterm birth, miscarriage, or injury.³ Indeed, women are four-times more likely to deliver preterm if their job tasks involve frequent heavy lifting.⁴ Low-income women, in particular, may have to choose between the health of their pregnancy or their own job security. The bill's framework for accommodations can ensure that a pregnant worker would be able to remain employed with the additional support necessary to address her health needs and ensure a healthy pregnancy.

This legislation is especially relevant for the approximately 20 percent of working women – a total of 15.2 million women – who live in households that earn less than 185 percent of the federal poverty line, which is the income threshold for WIC participation.⁵ Indeed, the average annual household income for WIC families is \$18,626.⁶ Of the 15.2 million working women within WIC's income guidelines, 59 percent (approximately nine million) are working part-time.⁷ By strengthening protections for working women so that they can continue in their positions during pregnancy, this legislation is bolstering family income and job security for millions of WIC families.

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Rev. Douglas A. Greenaway
Washington, DC
President & CEO


The reasonable accommodations framework is a tested and balanced approach that would permit pregnant workers to continue to earn an income and maintain job security, while also ensuring healthy pregnancies and securing positive birth outcomes. By drawing on the Americans with Disabilities Act model, employers are already familiar with the framework. Twenty-seven states have enacted similar provisions for pregnant workers, but national uniformity is necessary to provide clarity for both businesses and workers.

As direct service providers that serve almost two million pregnant and postpartum women, the WIC community is supportive of steps that safeguard the health of pregnancies, while also supporting family economic security. This legislation is a necessary step to ensure that children of working parents are able to get a healthy start to life.

We applaud the Subcommittee for its leadership in raising awareness about this important legislation.

Sincerely,

The National WIC Association



Rev. Douglas Greenaway
President & CEO

cc: Chairman Robert C. Scott
Ranking Member Virginia Foxx

¹ March of Dimes, “The Cost of Prematurity and Complicated Deliveries to U.S. Employers” (2008), https://www.marchofdimes.org/Peristats/pdfdocs/cts/ThomsonAnalysis2008_SummaryDocument_final121208.pdf.

² March of Dimes, “Premature Babies Cost Employers \$12.7 Billion Annually” (2014), <https://www.marchofdimes.org/news/premature-babies-cost-employers-127-billion-annually.aspx>.

³ US Ctrs. for Disease Control & Prev., Nat’l Inst. for Occup. Safety & Health, “Reproductive Health and the Workplace” (2017), <https://www.cdc.gov/niosh/topics/repro/physicaldemands.html>.

⁴ SB Runge, et al., “Occupational lifting of heavy loads and preterm birth: a study within the Danish National Birth Cohort,” 70(11) *Occupational and Environmental Medicine* 782 (2013), <https://www.ncbi.nlm.nih.gov/pubmed/23839660>.

⁵ Nat’l Acads. of Sciences, Engineering & Medicine, “Review of WIC Food Packages: Improving Balance and Choice: Final Report” (2017), <https://www.ncbi.nlm.nih.gov/books/NBK435920/#> (citing U.S. Census Bureau data).

⁶ U.S. Dep’t of Agriculture, Food & Nutrition Serv., “WIC Participants and Program Characteristics 2016, Final Report” (Apr. 2018), <https://fns-prod.azureedge.net/sites/default/files/ops/WICPC2016.pdf>.

⁷ Nat’l Acads., *supra* n.5.