**Clinical Chats Official Podcast Transcript**

**Title:** Understanding Ohio v. Becerra

**Speaker:** Robin Summers, JD

**Duration:** 00:20:34

**Katherine Atcheson (**[**00:05**](https://www.rev.com/transcript-editor/shared/cZXDQ_d9DVxnzwGNOpFSqaVJmC-_FZsJk3AIfwhyLcrH4gAfs8Dv330ZnNM2hDp-EdvYH2ez9mg39XvFLy6txxvOea4?loadFrom=DocumentDeeplink&ts=5.13)**):**

Hello and welcome to Clinical Chats, a podcast for sexual and reproductive healthcare professionals. Clinical Chats, formerly known as the Family Planning Files, is a program from the Clinical Training Center for Sexual and Reproductive Health, or CTCSRH, formerly known as the National Clinical Training Center for Family Planning or NCTCFP and is funded by the Office of Population Affairs in order to enhance the knowledge of Title X clinicians and other staff. In today's podcast, we'll be discussing the recent federal ruling, Ohio v. Becerra and what that means for Title X service sites and providers, as well as what we may be able to anticipate in the future of this case.

**Katherine Atcheson (**[**00:50**](https://www.rev.com/transcript-editor/shared/33Z9ud0zV8zMlFrzdvRqcL4ftW93ngDW8oLZ8QYNxosvcHH_OmzeR7bg3yJwfOYu3yOLri0RrYm_cdKeZkkrWwkg_S4?loadFrom=DocumentDeeplink&ts=50.04)**):**

Our guest today is Robin Summers, JD. Robin is Vice President and Senior Counsel at the National Family Planning and Reproductive Health Association where she's worked since 2005. Welcome back to the podcast, Robin. We're so excited to have you on today.

**Robin Summers (**[**01:08**](https://www.rev.com/transcript-editor/shared/mcH_XLeQuL0gv37FG3nAWSjJDorVY4BZWUya7uSbyjuaAP37u9yaKEG2442_0__UET0vTLAasxoxDvsjnHTMpXpsKSU?loadFrom=DocumentDeeplink&ts=68.37)**):**

Thank you for having me back.

**Katherine Atcheson (**[**01:10**](https://www.rev.com/transcript-editor/shared/mheC3MiNVL64Eb88PlUX6DXMFF6qbbCCySkykY0TVzInfj25JRhrijMljrCGtWKQa1xpvJVIEYusGQUOTyxR99Gv_mY?loadFrom=DocumentDeeplink&ts=70.35)**):**

To begin with, what exactly is the premise of the case Ohio v. Becerra?

**Robin Summers (**[**01:17**](https://www.rev.com/transcript-editor/shared/Wg8H7eGPfPGgHWC4z0YJCX2S7UWtaKaE0HcmuQ4-JNNMIlh8Bwm7_-pVTQhefqnpecrgQX5Zas67OxktlAvT3yZGFn8?loadFrom=DocumentDeeplink&ts=77.22)**):**

Yeah, so this case was brought by Ohio and originally 11 other states, Alabama, Arizona, Arkansas, Florida, Kansas, Kentucky, Missouri, Nebraska, Oklahoma, South Carolina, and West Virginia. And I say originally brought, because Arizona has since withdrawn from the case. But it is a challenge to the 2021 Title X rule, which in itself was a rescission and replacement for a prior rule, the 2019 Trump era Title X rule. So, under the 2019 rules restrictions, Title X entities were prohibited from referring for abortion care and were obligated to be fully, physically, and financially separate from abortion services among a number of other restrictions. The rule really shattered the network, resulted in nearly a thousand providers leaving the Title X program and it's taken years to recover. Those providers were able to return once the 2019 rule was rescinded thanks to the 2021 rule, that is the rule that's being challenged here.

**Robin Summers (**[**02:31**](https://www.rev.com/transcript-editor/shared/QzpebNVv_-7KEwDF87gIAdUE926movd34Znzx10GrTcC6h5Kf90bDzkbHpkGqJNfQYOOjxjpFTsNKFtGwF0b2vaPlIA?loadFrom=DocumentDeeplink&ts=151.47)**):**

So the states argue basically that the 2021 rule was, I'm going to use some phraseology here, but I'm going to explain it. That it was contrary to law, number one, and that it was arbitrary and capricious, number two, under a law that's called the Administrative Procedure Act or APA. So contrary to law means basically what it sounds like, that a federal agency's rule conflicts with some statutory or constitutional provision, for example, a rule conflicts with the underlying statute that's being interpreted by the rule. Arbitrary and capricious is, looking at whether an agency's rule was reasonable, is it supported by evidence or do the agency's explanations run counter to the facts that were before it? Did the agency consider important aspects of the problem, or did it entirely fail to consider an important aspect? Questions like those.

**Robin Summers (**[**03:34**](https://www.rev.com/transcript-editor/shared/LfzjnUPdSQQ9fwYsWTRSlPr4KSrfyZss9lARnyVvVAjH3YUpVnwX13daeaNNIWebmUYjbzSXSeT8Oo77JPE_tqOzrGo?loadFrom=DocumentDeeplink&ts=214.02)**):**

So, the states that brought suits specifically challenged two portions of the 2021 rule, the aforementioned, referral for abortion care, which is a requirement under the 2021 rule, and the parameters that the '21 rule sets for, what's referred to as program integrity, but basically, separation, what we talked about earlier. And they argue that these provisions are at odds with the underlying Title X statute and a specific section of that statute called Section 1008, which is what states that there is a prohibition on the use of Title X funds for abortion. So that was a lot, but that in a nutshell is what the lawsuit is over.

**Katherine Atcheson (**[**04:16**](https://www.rev.com/transcript-editor/shared/xvGOGx7r8ZvrYmP-8ZL6Ka-dXGRUAoEaGu2KR8PsnbVAooVf8AfZhrAbIlmR9VtmIVIY_KjkaWqFFcowpqzpWO6neRA?loadFrom=DocumentDeeplink&ts=256.77)**):**

And as we mentioned in the intro, recently there's been a ruling issued by the Sixth Circuit, which is a Federal Court in Ohio v. Becerra. Would you explain what that ruling is?

**Robin Summers (**[**04:30**](https://www.rev.com/transcript-editor/shared/sNTaJ6eB34LH7Prw3xYs2EDsOAM01zwrRIwG4XVce1PCqRQemshSFI4oX0HfnFrYAMuT8SwRqaorSE7384masqMaPDw?loadFrom=DocumentDeeplink&ts=270.33)**):**

Sure. So let me just walk through a bit of procedural history so you can kind of see how this case got to where it is. So, on December 29th, 2021, the U.S District Court for the Southern District of Ohio upheld the 2021 Title X rule in this case. The court denied the plaintiff's request for, what's known as a preliminary injunction, basically a temporary injunction to block the 2021 rule, applying a certain standard of deference, which I'll talk about in a bit. The District Court held that the 2021 rule was fine with regard to the Title X statute and it was also not arbitrary and capricious.

**Robin Summers (**[**05:10**](https://www.rev.com/transcript-editor/shared/8vM1vX0Y7xnf-liU8J9HwOzT5KWoaMHWg8dm4Z8K7zy4lZJVE60NANoDPqm9c9Pr0p0-MUsIkwZQMJ8JuBuTnPLRcPY?loadFrom=DocumentDeeplink&ts=310.74)**):**

The states appealed, and again, this portion of the case was just the preliminary injunction. A lot of times when lawsuits are filed, if there's a preliminary injunction being sought, the case sort of splits off into two different sections, if you will. The first, the one that moves faster tends to be the preliminary injunction phase, and then the second part of it is actually what we would call the merits phase, so it's the substance of the case. In a preliminary injunction, the court is trying to rule on whether you have a likelihood of success in your case, and the merits case is actually, do you succeed, in sort of the simplest possible terms. So, we're only at this point talking about the preliminary injunction phase. The merits phase of this case is actually still on hold, it has not moved. It's still sitting at the District Court and the District Court has not ruled on it. So, I just want to get that out of the way, so all we're talking about here are injunctions.

**Robin Summers (**[**06:01**](https://www.rev.com/transcript-editor/shared/k2iq-RLgYu76cJ-7cd-QGxf7qkdKWF8BQ_bvkdaXuCZJMpZF2v57WqEjyLWUtFNLWzh_f75lEsnaC01TN2EYZye1I8s?loadFrom=DocumentDeeplink&ts=361.62)**):**

So the states appealed on the preliminary injunction to the US Court of Appeals for the Sixth Circuit, which is sort of the next level up, and they also filed an emergency motion for what's known as an injunction pending appeal. So basically, even though injunctive phases tend to move faster, they still take a while. And so, the states had filed for an emergency injunction, basically that would put an injunction in place while the Sixth Circuit was deciding if there would be an injunction. It's a fairly commonly sought remedy if there is an argument that the plaintiff wants to make that a significant risk of harm in not granting an injunction. Motion's panel for the Sixth Circuit denied the state's motion for this injunction, pending appeal. Basically, saying that the states had not demonstrated that they would be irreparably harmed without the injunction.

**Robin Summers (**[**06:55**](https://www.rev.com/transcript-editor/shared/lONvYKRqpL_RrZl6I5xlD-YjxWFQPlLTbdcCn3vTYYq3CFIS-CKYLBLdzK44pTyEbO1h3tj3Dm36iAeFVUkX4okhesw?loadFrom=DocumentDeeplink&ts=415.65)**):**

And so then the case just moved along its normal track on the preliminary injunction appeal. Oral argument on the preliminary injunction appeal was held before a different three-judge panel of the Sixth Circuit in October of 2022 and then November 30th, 2023, that panel issued its ruling on the preliminary injunction. And as I said, the merits case has been stayed and is basically on hold while this preliminary injunction appeal continues to move forward. So that's sort of the background, that's how we got to where we were.

**Robin Summers (**[**07:26**](https://www.rev.com/transcript-editor/shared/qEdCfA0l3DQcx3g2_naQxm7yyoex5HcXKPX_tT5eiOorGRhU8xRlSKBwj1ZGMKaEJNDfqve0eIDg1ng64MyrRAZZ4PE?loadFrom=DocumentDeeplink&ts=446.61)**):**

So, what does the Sixth Circuit ruling actually say? Honestly, and it's a fairly surprising ruling in some sense, because it largely was a victory for the Title X program and for the 2021 rule, albeit with some puzzling implications and it may not stay that way forever. So, in a significant win, the Sixth Circuit panel did in fact uphold the District Court ruling with regard to the abortion referral requirement in the 2021 rule. I will say that it was a somewhat begrudging upholding of the District Court ruling. The panel basically said that U.S Supreme Court had previously interpreted Section 1008 of the Title X statute in a 1991 decision that's called Rust v. Sullivan. And they had previously interpreted Section 1008 and held that that section is ambiguous as to program integrity and abortion referral, so meaning that the prohibition on abortion in 1008 does not speak to referral nor say that strict physical separation is required.

**Robin Summers (**[**08:33**](https://www.rev.com/transcript-editor/shared/i0sHbjISF6do4GgF0oru5ZiUqOBaUXpVr3wVn378oBSUDknNfEbAZw4ipUMWs5brS26KtQvRh73T-LS0GtZ2HlJGW3U?loadFrom=DocumentDeeplink&ts=513.15)**):**

And so, because Rust v. Sullivan had held that Section 1008 was ambiguous with regard to these issues, the Sixth Circuit here said that they have to apply a principle that's known as Chevron deference. Chevron deference means that the court must defer to the federal agency's interpretation of a statute if that interpretation is permissible. Under that standard, the Sixth Circuit said, they kind of give a double negative. They say, this is the quote, "We cannot say that the 2021 rules referral requirement is an impermissible interpretation of Section 1008." So, they don't say it's permissible, but they say they can't say it's impermissible. So as I said, begrudging, but bottom line is they upheld it.

**Robin Summers (**[**09:20**](https://www.rev.com/transcript-editor/shared/46DeGcGumXQSQyre_faOG6D7XHIEZSrYpqcfm7peQz6J7CCeL85cCA1rM8504diuLcF-N113OVV63oaCiXyc_aUQzyo?loadFrom=DocumentDeeplink&ts=560.31)**):**

However, the panel also held that the 2021 rules program integrity requirements, that separation piece that I mentioned between Title X and projects and abortion related services, said that those requirements are not a permissible interpretation of Section 1008 of the statute. The ruling does not hold that 1008 requires complete physical separation between Title X and abortion services, I want to say that again, it does not hold that complete physical separation is required. So, it doesn't require going back to that 2019 rule and the requirements that were in that, instead the Sixth Circuit ruled that the regulations basically need to have more concrete terms for compliance. So, something between what's in the 2021 rule and the Trump rule is sort of the best interpretation of that right now.

**Katherine Atcheson (**[**10:13**](https://www.rev.com/transcript-editor/shared/-_xxJGGEapljMjSM3yspZtYjEltUxZpBpIkot3ImcvJu_Mewj0u4jskQxQdud_yAwPcznSGLxSXYK_DPuZL_bju1y_c?loadFrom=DocumentDeeplink&ts=613.2)**):**

So as you mentioned, previously the court issued a preliminary injunction just for the state of Ohio. What is the role practically for this preliminary injunction and why is it only for Ohio and not the other states who have joined Ohio in this suit?

**Robin Summers (**[**10:31**](https://www.rev.com/transcript-editor/shared/ONCyIrnt5m0b-gnpNA88NyhNfiMarBwmNvXxzBfRsKF0dmIIuxVwRO8qTDEnVPwIK9ngIt3NKVaK01JUsY3K4EaaHZI?loadFrom=DocumentDeeplink&ts=631.77)**):**

Yeah, so the practical implication right now is actually nothing because the injunction is not actually in effect, and I'll come back to why that is. But the relief, let's talk about that part of it first, why it's limited to the state of Ohio. It's limited to Ohio, because "Only Ohio made the requisite showing of irreparable harm." So earlier I mentioned that to get a preliminary injunction, you have to show that you have irreparable harm. Ohio was the only state out of all the plaintiffs that actually submitted any kind of evidence of harm. And so, the Sixth Circuit, when it was ruling on the preliminary injunction said, "Okay, well we can't do anything for these other states that didn't submit anything but Ohio, you submitted something, so therefore we can go ahead with that."

**Robin Summers (**[**11:13**](https://www.rev.com/transcript-editor/shared/E7rmDc0uzxLqfKUhW4GqmU2ABW6nEQQkwbpgld0Wgk6Is9SlFanmaIPZEECPhX8mUOuUxuLD01mvR1iLjeGBRhCYJ60?loadFrom=DocumentDeeplink&ts=673.74)**):**

The preliminary injunction that's granted to Ohio is further limited to a quote that's a little bit confusing, but I'm going to read it anyway. So, it's limited to, "Enjoining the United States from enforcing the 2021 rules, program integrity rules, in Ohio in a manner that would affect the allocation of funding in Ohio." What does that mean? We're not sure. I'm not sure anybody is sure at this point. And in part that is because the injunction is not in effect. So, it hasn't had any kind of effect yet, but the reality is this language is fairly particular. The court's not saying, "We're enjoining this part of the rule," they're saying, "We're enjoining it with regard to Ohio, but only as that part of the rule affects Ohio or that would affect Ohio in terms of the allocation of funding in the state of Ohio." So, there's a lot of pieces there that we're just not sure about.

**Robin Summers (**[**12:09**](https://www.rev.com/transcript-editor/shared/z5QEbd8DFAngr4dLC3XLkc-LoxIGukyYnYrv-PhSAaa8pUS03iDy1SvwfjHqF43wF2zprHROJuW0vYmkHpVfwli2Ycs?loadFrom=DocumentDeeplink&ts=729.81)**):**

So, it's unclear what exactly this injunction, if and when it goes into effect, would prevent the Office of Population Affairs from doing in Ohio or what it might require them to do there. So, beyond those sort of exact implications, the big takeaway here, the bottom line is that the injunction is not in effect and so the 2021 rule stands as is right now. And everybody should keep operating under the rules under the 2021 rules at least until there's a point in time where that changes, but right now, that's the law of the land.

**Katherine Atcheson (**[**12:45**](https://www.rev.com/transcript-editor/shared/kbkkJOBxfTehqDA9DP-FUTRjcSE4CkrL-S3YE1iWZCJzxTBrHvHWsU7Vpp44ihQ4qEr7wtncUHITu56VnwHzCGvkP-4?loadFrom=DocumentDeeplink&ts=765.45)**):**

And so that leads us really well into my next question looking towards the future of this case. What do we know or anticipate might be happening and are there things Title X grantees and service sites might want to be aware of as this case moves forward?

**Robin Summers (**[**13:06**](https://www.rev.com/transcript-editor/shared/oxRo4h3zyWFkwyk0c_yDSdt7l18qQZS_rYfTIXcRqLjCMj5rAFVoSavWCenjp9Q91mU84NjVyAPUdLzh02ZQnpz2eSE?loadFrom=DocumentDeeplink&ts=786.45)**):**

Yeah, so I mean, the bottom line is, we've got quite a bit more case to come in this particular case. One or both of the parties could seek U.S Supreme Court review of the preliminary injunction ruling. And the reason that both parties potentially could is because you could have what's known as a cross appeal, because we like to just confuse everybody with all these legal terms. But basically, the federal government both won and lost in the case, right, and the states both won and lost in the case. The state plaintiffs lost on the abortion referral piece, but they won on a version, functionally, of program integrity, but yet the relief is also limited only to Ohio. So, there's sort of this weird dichotomy that's sort of created with the federal government, which won on abortion referral, but lost on program integrity. So, the federal government could potentially appeal on the program integrity piece and the state plaintiffs could potentially appeal on the abortion referral piece and perhaps the application of the preliminary injunction only to Ohio.

**Robin Summers (**[**14:08**](https://www.rev.com/transcript-editor/shared/82MRBPSzwkOimPzWXhEzuMrhKd1DtdFQbPNEnT3nzl2MKhLDdJzheotkydXtAMF2Jn28qxw07w_T-7bPg1LQe65uc4Y?loadFrom=DocumentDeeplink&ts=848.28)**):**

Whether any of that will happen, I don't know, but we'll have to see basically how that all happens. So, there's a lot of procedural stuff that's probably going to happen in the coming weeks. Alongside that, we have the merits phase, which I said earlier, is on hold right now. After the Sixth Circuit ruling on the preliminary injunction came out, both the state plaintiffs and the federal government filed basically a joint document with the District Court saying, "Yeah, we'd like to keep this on hold pending, basically all of these different appeal paths. While we play this out, just keep this case on hold while we figure out what's going on with this injunction." So, the bottom line here is that for all grantees and service sites, don't change anything right now, keep doing what you're doing unless and until a court rules differently or OPA tells you differently.

**Katherine Atcheson (**[**14:56**](https://www.rev.com/transcript-editor/shared/YvnxsSSz62e21MWHeL6AEF4j25ooyfPR6MuYmOur49Xoe_KhL2SypYSkSjBCtAjAF-PEQ_DfhAjJwcPv068qBfOaqbg?loadFrom=DocumentDeeplink&ts=896.64)**):**

And as you've said, we've got quite a bit more case to come, not just the merits phase, but also seeing how this injunction plays out. What are some good places for clinicians and other Title X staff to go if they want to keep up with the developments in the case or learn more about it?

**Robin Summers (**[**15:15**](https://www.rev.com/transcript-editor/shared/1vxj4rTsHO6hYpRFwCkNJuEwMbBrahV0b---5fr1A2O54vBKZPWj6sECzlGjifCEiOY0xVZK8N45J6y_DyBcj1__UUU?loadFrom=DocumentDeeplink&ts=915.99)**):**

Well, I can tell you that NFPRHA, my organization, we follow these things very closely, as you might imagine. We filed amicus briefs in this case, it's called a friend-of-the-court brief, basically trying to provide some extra context. So obviously we are keeping a very close eye on it, and we report on this and other developments in other cases. So certainly, we will be doing that, and we try when we report on these things to make sure we're providing that sort of analysis and context. You can read a ruling and, even like the Sixth Circuit ruling, there's what it says and then there's what does it mean? And those two things may be very different and so we at NFPHRA always try to get to the, what it says, but also what it means or at least what we think it means. So, we will continue to do that, so certainly you can look to us for that.

**Robin Summers (**[**16:04**](https://www.rev.com/transcript-editor/shared/AmO4bF2co4UNmRdb5NHWlPg3Zf1-Yh871sEE7TOWvY7xTeofktn06gkxsD9FIX14F570HZT0skl7ehspcJCMhrj80K4?loadFrom=DocumentDeeplink&ts=964.83)**):**

I'm sure that the training centers will also have things to say as time goes on, and certainly I think that's a terrific place for people to get information. The thing that I would caution against, honestly is, media reports on these cases. As you heard in this podcast, cases tend to be very technical and complicated, both from a legal standpoint, but also just from a Title X standpoint. And a lot of times the media will report on something without the full context or a full understanding of all the ins and outs. Their top line for this ruling was basically, "Sixth Circuit strikes down Title X rule." I was like, "No, no, no, no, no. That's not what happened." And so, if you just read those headlines or you see some of these press reports come through, you might be like, "Oh my gosh, what just happened? This terrible thing just happened. Why am I not hearing about this anywhere else?"

**Robin Summers (**[**16:58**](https://www.rev.com/transcript-editor/shared/2LyE5KN8KE67U6Aoor4mVArndsnsm0cJ_3c_0R7RBMh0uaspL14zh19hCHKaSsmKO2yDwxIj03QO-cwzQLH-V72heoQ?loadFrom=DocumentDeeplink&ts=1018.32)**):**

So, take, basically whatever you read in the media with, not just a grain of salt, but sometimes cups of salt and go to your trusted sources, just really be vetting your information as it comes through. And don't be afraid to ask questions, you can contact NFPHRA, you can contact, I'm sure, the training centers, contact OPA. Sometimes they can say something and sometimes they can't, especially as litigation continues. But yeah, look for trusted sources.

**Katherine Atcheson (**[**17:24**](https://www.rev.com/transcript-editor/shared/STDsfdPHq9aywG1-k31JtXSsyCUv6z4453pwFh8WbPBd1b7uPpMdxv9EshYRte6xUMxxphgQ1eW1oWyzyf8MB728-wM?loadFrom=DocumentDeeplink&ts=1044.36)**):**

Well, this has been such an informative chat Robin, but before you go, I always like to ask our guests, what is your final message to our listeners? What is the one thing you really want them to remember from this podcast as they return to their practices?

**Robin Summers (**[**17:40**](https://www.rev.com/transcript-editor/shared/4ONmaX7RoNEXzcv7QqoJ-PcPkjOf9l8V49T81oibFbLK007ReVoXOJ6ZCUPeTmy73e66Zce00dZTOwsmssj37uumB24?loadFrom=DocumentDeeplink&ts=1060.14)**):**

Yeah, I think I'd say be mindful of this and other legal challenges that may ultimately impact Title X and Family Planning Care. There's a number of things we're tracking now, we expect more in the coming years, so it's important to keep an ear to the ground as to what's happening, but you also can't be consumed by it, we'll do that for you. But keep doing the great work you're doing and focus on that work and on the patients and the staff and all of those things. At a time when reproductive health continues to be under attack and when people's rights are being taken away, we really, really need a strong family planning workforce to deliver essential care to people who need it. So thank you for what you're doing and just urge you to keep doing it.

**Katherine Atcheson (**[**18:27**](https://www.rev.com/transcript-editor/shared/10YAvx8DJssANg1ihN_3NECk0SCQ_wEWbKuSWl0R-Q9jXHFAn-9JVw0RwqYMz04HSHX-NSdQl3vRXz69_d8HfNWm3fI?loadFrom=DocumentDeeplink&ts=1107.3)**):**

And thank you Robin so much for joining us today and sharing your time and expertise with our listeners.

**Katherine Atcheson (**[**18:34**](https://www.rev.com/transcript-editor/shared/XxU7iuvEIObnGmWQeqH4p6lrDGrHddYzRvjalG0fd4o5kF7q_qgVxEM-Eb4WlAD9qXdjtEWuUAClOOeAqL8k6_xh8qI?loadFrom=DocumentDeeplink&ts=1114.62)**):**

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**Katherine Atcheson (**[**19:32**](https://www.rev.com/transcript-editor/shared/lUZc4IgTjg5OCisfxWw70sF8s6RTimJWYBsWnXesOW-DMvNDEOfYu6ZyNxTfTHf_OAhLe-tJLdO2rs0Nk7RFp1DYbj0?loadFrom=DocumentDeeplink&ts=1172.94)**):**

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**Katherine Atcheson (**[**20:05**](https://www.rev.com/transcript-editor/shared/yYXqLY5pQzxq5c3VC3_k74bINR8vPhhC41MPsMgW3F-ySZu23L32FLeGql4_rXXdwQJAdvi-YxzjD71VHmLtwGJFNCE?loadFrom=DocumentDeeplink&ts=1205.82)**):**

Theme music written by Dan Jones and performed by Dan Jones and The Squids. Other production support, provided by the Collaborative to Advance Health Services at the University of Missouri-Kansas City School of Nursing and Health Studies. And finally, thank you to our listeners for tuning in today. We hope that you'll join us next time for another episode of Clinical Chats.