



# EMPLOYMENT

## FACT SHEET

### **Accommodating Pregnancy On the Job: The Stakes for Women of Color and Immigrant Women**

May 2014

*All too often, pregnant workers—particularly those in physically-demanding and low-wage jobs—are terminated, forced to quit, or involuntarily placed on unpaid leave because they ask for simple, reasonable, and temporary accommodations at some point during their pregnancies such as avoiding heavy lifting, being permitted to sit during a very long shift, or staying off high ladders. Many employers refuse to make these accommodations for pregnant workers who need them even when they provide them to workers with disabilities and injuries; this refusal jeopardizes women's health and their pregnancies. Women of color and immigrant women are disproportionately likely to work in some physically-demanding and low-wage jobs with little flexibility and thus are especially likely to need these accommodations. When their requests for accommodations are denied, they are forced to choose between protecting their pregnancies and keeping their jobs.*

#### **Women of Color and Immigrant Women Are Overrepresented in Some Physically-Demanding and Low-Wage Jobs That Can Pose Particular Obstacles to Pregnant Workers**

Many pregnant women will never need any changes at work, but others may require some job modifications to continue safely working during their pregnancies. Low-wage or physically-demanding occupations in which pregnant workers have sought accommodations and been denied include: retail salespersons, food service workers, health care workers (including home health aides and nurses), stocking and package handlers, cashiers, cleaners, police officers, corrections officers, mail carriers, office clerks, and truck drivers.

Women of color and immigrant women make up a disproportionate share of workers in some of these occupations compared to their overall representation in the workforce, increasing the likelihood that they will need workplace accommodations during pregnancy. For example:<sup>1</sup>

- Latina<sup>2</sup> women make up 6.5 percent of employed workers, but 26.1 percent of workers employed as hand

packers and packagers.<sup>3</sup> Hand packers and packagers spend most of their workdays loading, unloading, and stacking containers as well as moving or lifting heavy objects.<sup>4</sup> Workers in this industry are typically paid an hourly wage of \$9.57.<sup>5</sup>

- Immigrant women make up 7 percent of employed workers, but 44.9 percent of workers employed as maids and housekeeping cleaners.<sup>6</sup> These workers are required to stand almost continuously, are exposed to contaminants at least once a week, and spend substantial amounts of time walking or running.<sup>7</sup> Workers employed as maids or housekeepers typically make an hourly wage of \$9.41.<sup>8</sup>
- African-American women make up 5.9 percent of employed workers, but 28.4 percent of workers employed as nursing, psychiatric, and home health aides.<sup>9</sup> Their jobs require physical activity such as lifting or transporting patients, setting up equipment, and cleaning rooms.<sup>10</sup> Nursing, psychiatric, and home health aides typically make an hourly wage of \$11.07.<sup>11</sup>

Women of color and immigrant women are also overrepresented in some occupations where

environmental hazards are present, and many of these hazards can pose particular risks during pregnancy.<sup>12</sup>

For example:

- Asian and Pacific Islander women, make up 2.6 percent of employed workers, but 43.8 percent of personal appearance workers employed as shampooers, skin care specialists, makeup artists, or manicurists and pedicurists.<sup>13</sup> These women are frequently exposed to toxic chemicals that have been linked to reproductive health problems including miscarriage.<sup>14</sup> These personal appearance workers typically make an hourly wage of \$9.64.<sup>15</sup>
- Women of color and immigrant women are overrepresented among laundry and dry cleaning workers. For example, African-American women make up 5.9 percent of employed workers, but comprise 10.7 percent of laundry and dry cleaning workers; Latina women make up 6.5 percent of employed workers, but 20.9 percent of laundry and dry-cleaning workers; and immigrant women make up 7 percent of the employed workforce and 24.1 percent of these workers.<sup>16</sup> Workers in the laundry and dry cleaning business may be exposed to harsh chemicals.<sup>17</sup> Laundry and dry cleaning workers earn a median wage of \$9.58 per hour.<sup>18</sup>

The accommodations that pregnant workers typically seek are often low cost or no cost to the employer<sup>19</sup> and might include honoring a lifting restriction; allowing an employee to stay off high ladders; redistributing particular physical tasks among members of a workplace team; and allowing an employee to sit rather than stand for very long periods of time.

### **Failure to Accommodate Pregnancy Can Cause Economic Instability for Women of Color and Immigrant Women**

When employers refuse to make needed accommodations, all too often pregnant women of color and immigrant women suffer devastating consequences to their often already precarious financial well-being.

Women of color are more likely than white women to be family breadwinners,<sup>20</sup> and also more likely to be low-income.<sup>21</sup> As a result, job loss during pregnancy hits these women and their families particularly hard.

**Guadalupe Hernandez,\* worked in food preparation and service, a job that required her to stand for long periods without breaks. When she became pregnant and gave her boss a doctor's note requiring more frequent access to water and bathrooms, she was fired. Every time she tried to apply for a new job, employers looked at her pregnant belly and turned her away. Unable to find work, and lacking a cushion of savings, she relied on food stamps and unemployment benefits to make ends meet for her family.**

*\*Name and identifying details changed at worker's request.*

More than half of working African-American married women and forty percent of working Latina married women are primary breadwinners or co-breadwinners and earn the same as or more than their husbands annually.<sup>22</sup> And African-American women and Latina women are more likely than white women to be single parents and the sole breadwinners in their families.<sup>23</sup> In 2012, more than half of African-American families with children were headed by single women, and 30 percent of Latino families with children were headed by single women.<sup>24</sup>

While women of color are more likely than other women to have primary financial responsibility for their families, they are also more likely to live in poverty compared to their white counterparts.<sup>25</sup> African-American and Latina women are more likely than white men and women to work in jobs that pay at or below minimum wage,<sup>26</sup> and they have also experienced slower wage growth than women overall.<sup>27</sup> In one study by the Institute for Women's Policy Research focused on economic insecurity after the Great Recession, 31 percent of African-American women and 28 percent of Latina women reported having a "somewhat difficult" or "very difficult" time paying for food for their families, compared to 22 percent of white women.<sup>28</sup> And 33 percent of African American women and 31 percent of Latina women versus 21 percent of white women said they had problems paying their rent or mortgage in the past year.<sup>29</sup>

In part because women of color are more likely to work in low-wage jobs,<sup>30</sup> they also face a staggering wage gap. Women overall are underpaid relative to men: women working full time, year round are typically paid only 77 cents for every dollar paid to their male counterparts. But women of color fare much worse: African-American women working full time, year round are typically paid only 64 cents, and Latina women only 54 cents, for every dollar paid to white, non-Latino men working full time, year round.<sup>31</sup>

Immigrant women, too, face substantial economic hardships—in fact, they have been called the “least economically secure population in the United States.”<sup>32</sup> Obstacles to wealth accumulation include language and cultural barriers, immigration status, and ineligibility for many types of government assistance.<sup>33</sup> The wage gap is even higher for women in this category; for example, non-citizen foreign-born women working full time, year round typically make 50 cents for every dollar paid to native-born men.<sup>34</sup>

Losing a job compounds the financial hardships that these workers already face. Many women of color and immigrant women forced off the job during pregnancy can be pushed them to the brink of financial disaster. Often with no savings or only limited savings to fall back on,<sup>35</sup> many of these women may quickly find themselves on a downward spiral into poverty.

Not only do pregnant women of color and immigrant women who are forced off the job lose precious wages, they may lose health insurance benefits. Many of these workers must then turn to public insurance programs to cover their maternity care, if they are eligible. Immigrant women’s eligibility depends on the law of the state they reside in; most states offer coverage, but the scope of services is limited.<sup>36</sup> States can determine whether to impose a five-year waiting period before providing Medicaid benefits to lawfully residing pregnant immigrant women and whether to extend coverage to women for prenatal, labor, and postnatal care regardless of immigration status, through the Child Health Insurance Program.<sup>37</sup> Undocumented women are otherwise only eligible for emergency care under Medicaid.<sup>38</sup> If women are ineligible for public insurance, they may have to obtain alternative health care coverage at a higher cost.<sup>39</sup>

Unfortunately, given the persistence of hiring discrimination against pregnant workers, securing another job while visibly pregnant is often extremely difficult.<sup>40</sup> After being denied workplace accommodations and forced off the job, pregnant women may have to seek government

assistance such as unemployment insurance or Temporary Assistance for Needy Families (if eligible), exhaust their savings, rely solely on partners for income, or ask their older children to contribute financially.<sup>41</sup>

## Denying Accommodations During Pregnancy Imposes Health Risks on Women of Color and Immigrant Women

Pregnant workers in physically-demanding jobs who are denied workplace accommodations they need to work safely may nevertheless continue to do their jobs without the accommodation, because they cannot afford to go without a paycheck.

These workers may be at risk of complications such as preterm birth, low birth weight, pregnancy-induced hypertension and preeclampsia, congenital anomalies, and miscarriage.<sup>43</sup> In addition, performing strenuous or repetitive movements during pregnancy—as required by jobs in which many women of color and immigrant women work—may also lead to other health problems such as muscle and back pain, swollen ankles, and varicose veins.<sup>44</sup>

Exposure to workplace toxins can lead to adverse pregnancy outcomes, increased risk of reproductive cancers, and poor fetal health.<sup>46</sup> Given that many urban communities of color suffer from unusually high exposure to toxins,<sup>47</sup> pregnant women of color who are not accommodated may face environmental harms both in their workplaces and in their homes.

**Hilda Guzman worked as a cashier at a Dollar Tree store. After she became pregnant, she began to experience discomfort when standing for long periods of time. She asked if she could sit on a stool during her 10-hour shift. Her employer rejected her request. Because of the constant standing, she experienced bleeding, premature labor pains, and frequent visits to the emergency room.<sup>45</sup> Although she could have kept working if she had been allowed to sit on a stool, her doctor finally put her on bed rest to get her off her feet.**

Pregnancy accommodations are likely particularly important for women of color, because women of color disproportionately suffer from pregnancy complications and poor pregnancy outcomes. A report from Amnesty International explains that, in part because of discrimination, women of color have relatively lower access to primary care, are less likely to receive adequate maternal health care, and are more likely to die from birth related complications.<sup>48</sup> Many studies note that women of color experience pregnancy-related complications, in part as a result of pre-natal stress—including stress arising from experiencing discrimination.<sup>49</sup> For example, compared with white women, black women “are at higher risk for preterm labor and premature rupture of membranes, preeclampsia and other hypertensive disorders of

pregnancy, placenta previa and placental abruption, and infection.”<sup>50</sup> Furthermore, Asian and Latina women are at higher risk for gestational diabetes, mellitus, placenta previa, and postpartum hemorrhage compared to their white counterparts.<sup>51</sup>

## Conclusion

When employers refuse to make reasonable accommodations for pregnant workers, women of color and immigrant women are sharply impacted. Providing workplace accommodations to those pregnant women who need them will allow many of these workers to continue safely working during pregnancy, supporting their families and contributing to our economy.

- 1 The National Women’s Law Center (NWLC) cross-referenced two data sources to arrive at this conclusion. The first, *infra* note 3, provides the percentage of women of color and immigrant women employed in different job categories and in the workforce overall. The second, *infra* note 4, provides the type of physical activity required of workers in each job category. Jobs are considered “physically demanding” based on how frequently one must stand, walk, or run; whether they require ability to lift, push, pull, or carry heavy objects; or how frequently one is exposed to contaminants. The examples chosen for this fact sheet include jobs in which women of color and immigrant women are overrepresented as compared to women’s representation in the workforce generally.
- 2 Throughout this factsheet, “Latina” or “Latino” are used in place of “Hispanic.” Census data sources use the term “Hispanic.”
- 3 NWLC calculations based on *Integrated Public Use Microdata – American Community Survey (IPUMS-USA), 2010-2012 multi-year ACS (three-year estimates)*, MINN. POPULATION CTR., UNIV. OF MINN., <https://usa.ipums.org/usa/index.shtml> (last visited Mar. 24, 2014). Percentages are among all employed workers in an occupation. Latina women may be of any race. Immigrant women are defined as women who are naturalized citizens or non-citizens.
- 4 See NWLC analysis of *Work Context – Physical Work Conditions*, O\*NET ONLINE, [http://www.onetonline.org/find/descriptor/browse/Work\\_Context/4.C.2/](http://www.onetonline.org/find/descriptor/browse/Work_Context/4.C.2/) and *Abilities – Physical Abilities*, O\*NET ONLINE, <http://www.onetonline.org/find/descriptor/browse/Abilities/1.A.3/> (last visited Mar. 24, 2014). See *Summary Report for: 53-7064.00 – Packers and Packers, Hand*, O\*NET ONLINE, <http://www.onetonline.org/link/details/53-7064.00#WorkActivities> (last visited Mar. 24, 2014).
- 5 BUREAU OF LABOR STATISTICS, OCCUPATIONAL EMP’T STATISTICS, MAY 2012 NATIONAL OCCUPATIONAL EMPLOYMENT AND WAGE ESTIMATES UNITED STATES (2013), [http://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](http://www.bls.gov/oes/current/oes_nat.htm#00-0000) [hereinafter BLS]. Figures are for the median hourly wage of each occupation in 2012.
- 6 See NWLC calculations, *supra* note 3.
- 7 See *Summary Report for: 37-2012.00 – Maids and Housekeeping Cleaners*, O\*NET ONLINE, <http://www.onetonline.org/link/details/37-2012.00#WorkActivities> (last visited Mar. 24, 2014). Maids and housekeeping cleaners are required to stand almost continually, are exposed to contaminants at least once a week, and spend a substantial amount of time walking or running (scoring between “more than half the time” and “continually or almost continually”).
- 8 See BLS, *supra* note 5.
- 9 NWLC calculations *supra* note 3. Percentages are among all employed workers in *supra* occupation. Latina women may be of any race. Immigrant women are defined as women who are naturalized citizens or non-citizens.
- 10 See *Summary Report for: 31.1011.00 – Home Health Aides*, O\*NET ONLINE, <http://www.onetonline.org/link/details/31-1011.00#WorkActivities> (last visited Mar. 24, 2014). Tasks are for home health aides only (percentage women not available for this more detailed occupational category). Home health aides are also required to walk or run for most of their workday, and they are frequently exposed to disease or infection as well as to contaminants.
- 11 See BLS, *supra* note 5.
- 12 “A majority of domestic and hospitality workers are women of color and immigrant women. In these industries, workers are regularly exposed to industrial strength cleaning supplies, medical supplies, and other agents with known or possible impacts on reproductive health.” REPROD. HEALTH TECH. PROJECT & NAT’L LATINA INST. FOR REPROD. HEALTH, CHEMICAL INJUSTICE: THE UNEQUAL BURDEN OF TOXIC CHEMICALS ON WOMEN OF COLOR AND LOW-INCOME FAMILIES, <http://www.rhpt.org/fertility/vallombrosa/documents/EJRJfactsheetRHTPandNLRH.pdf> (last visited Mar. 24, 2014) [hereinafter “LATINA INSTITUTE”]. A pregnant woman’s ability to inhale dangerous gases and fumes are heightened due to pregnancy-related changes in her blood flow, respiratory functions, and increased fat composition. See Joanna L. Grossman, *Pregnancy, Work and the Promise of Equal Citizenship*, 98 GEO. L.J. 568, 583 (2010), available at <http://georgetownlawjournal.org/articles/pregnancy-work-and-the-promise-of-equal-citizenship/> (discussing physiological changes during pregnancy and a pregnant woman’s increased ability to absorb dangerous gases).
- 13 See NWLC calculations, *supra* note 3. Asian and Pacific Islander women include Chinese, Japanese, and other Asian or Pacific Islander women. Figure is for miscellaneous personal appearance workers.
- 14 LATINA INSTITUTE, *supra* note 12.
- 15 See BLS, *supra* note 5. Figure is for miscellaneous personal appearance workers.
- 16 See *Summary Report for: 51.6011.00 – Laundry and Dry-Cleaning Workers*, O\*NET ONLINE, <http://www.onetonline.org/link/details/51-6011.00#WorkActivities> (last visited Mar. 24, 2014).
- 17 See BLS, *supra* note 5.
- 18 *Id.*
- 19 NWLC, THE BUSINESS CASE FOR ACCOMMODATING PREGNANT WORKERS (2012), [http://www.nwlc.org/sites/default/files/pdfs/pregnant\\_workers\\_business\\_case\\_12.04.12.pdf](http://www.nwlc.org/sites/default/files/pdfs/pregnant_workers_business_case_12.04.12.pdf).
- 20 SARAH JANE GLYNN, CTR. AM. PROGRESS, THE NEW BREADWINNERS: 2010 UPDATE 3 (2012),

- <http://www.americanprogress.org/issues/labor/report/2012/04/16/11377/the-new-breadwinners-2010-update/>. Women as co-breadwinners or primary breadwinners are defined as working wives (over the age of 18) with annual earnings that are equal or greater to those of her husband. Data include married heterosexual couples only. African-Americans in this analysis are non-Latino/a.
- 21 NWLC calculations from U.S. CENSUS BUREAU, CURRENT POPULATION SURVEY, 2013 ANNUAL SOCIAL AND ECONOMIC SUPPLEMENT Table POV-04: Families by Age of Householder, Number of Children, and Family Structure, <http://www.census.gov/hhes/www/cpstables/032013/pov/toc.htm> (last visited Mar. 24, 2014). In 2012, 44 percent of all African-American families and 52 percent of African-American families with children were headed by single women. In 2012, 26 percent of all Hispanic families and 30 percent of Hispanic families with children were headed by single women. In 2012, 14 percent of all white, non-Hispanic families and 19 percent of white, non-Hispanic families with children were headed by single women. Of course, married women may also be the sole supporters of their families. Some households where women are heads of household do have a second earner.
- 22 GLYNN, *supra* note 20. Women as co-breadwinners or primary breadwinners are defined as working wives (over the age of 18) with earnings that are equal or greater to those of her husband. Data include married heterosexual couples only. African-Americans in this analysis are non-Hispanic.
- 23 NWLC calculations, *supra* note 21 at Table POV-04. In 2012, 14 percent of all white, non-Hispanic families and 19 percent of white, non-Hispanic families with children were headed by single women.
- 24 *Id.*
- 25 NWLC, INSECURE AND UNEQUAL: POVERTY AMONG WOMEN & FAMILIES 2000-2012 (2013), [http://www.nwlc.org/sites/default/files/pdfs/final\\_2013\\_nwlc\\_povertyreport.pdf](http://www.nwlc.org/sites/default/files/pdfs/final_2013_nwlc_povertyreport.pdf) [hereinafter "INSECURE AND UNEQUAL"].
- 26 BUREAU OF LABOR STATISTICS, CHARACTERISTICS OF MINIMUM WAGE WORKERS: 2013 Table 1: Employed wage and salary workers paid hourly rates with earnings at or below the prevailing Federal minimum wage by selected characteristics, 2013 annual averages (2014), <http://www.bls.gov/cps/minwage2012tbs.htm#1> (last visited Mar. 24, 2014).
- 27 NWLC calculations *supra* note 21 at Table P-38. Earnings for Asian women were not recorded until 1988 and could not be compared over this time frame. Figures are for median annual earnings for full-time, year-round workers. Racial definitions changed in the Census data with the 2002 data. After this point the earnings are for Black Alone and White Alone (earlier just Black and White); *id.* at Table FINC-03: Presence of Related Children Under 18 Years Old-All Families by Total Money Income in 2012, Type of Family, Work Experience in 2012, Race and Hispanic Origin of Reference Person, [http://www.census.gov/hhes/www/cpstables/032013/faminc/finc03\\_000.htm](http://www.census.gov/hhes/www/cpstables/032013/faminc/finc03_000.htm) (last visited Mar. 24, 2014).
- 28 Jeff Hayes & Heidi Hartmann, IWPR/ROCKEFELLER SURVEY OF ECON. SECURITY, WOMEN AND MEN: LIVING ON THE EDGE: ECONOMIC INSECURITY AFTER THE GREAT RECESSION (Sept. 2011), available at <http://www.iwpr.org/publications/pubs/women-and-men-living-on-the-edge-economic-insecurity-after-the-great-recession>. (Table 4.8 Current Difficulty Paying for Basic Needs).
- 29 *Id.* (Table 4.3 Problems Meeting Expenses in the Past Year).
- 30 NWLC, MINIMUM WAGE FACT SHEET: 60 PERCENT OF WOMEN'S JOB GAINS IN THE RECOVERY ARE IN THE 10 LARGEST LOW-WAGE JOBS (2013), <http://www.nwlc.org/sites/default/files/pdfs/60percentfactsheet.pdf>.
- 31 NWLC, INSECURE & UNEQUAL, *supra* note 25.
- 32 SOPHIA KERBY, THE CTR. FOR AM. PROGRESS, HOW PAY INEQUITY HURTS WOMEN OF COLOR 5 (2013), <http://www.americanprogress.org/wp-content/uploads/2013/04/KerbyPayEquity-1.pdf>.
- 33 *Id.*
- 34 NWLC calculations from CPS, 2013 ASEC using CPS Table Creator, <http://www.census.gov/cps/data/cpstablecreator.html> (last visited Mar. 24, 2014).
- 35 See INSIGHT CENTER FOR COMMUNITY ECONOMIC DEVELOPMENT, LIFTING AS WE CLIMB: WOMEN OF COLOR, WEALTH, AND AMERICA'S FUTURE 7-13 (2010), <http://www.insightcced.org/uploads/CRWG/LiftingAsWeClimb-WomenWealth-Report-InsightCenter-Spring2010.pdf>.
- 36 KARINA FORTUNY & AJAY CHAUDRY, THE URBAN INST., A COMPREHENSIVE REVIEW OF IMMIGRANT ACCESS TO HEALTH AND HUMAN SERVICES 6-9 (2011), <http://aspe.hhs.gov/hsp/11/ImmigrantAccess/Review/index.pdf>.
- 37 *Id.* at 6.
- 38 MICHAEL K. GUSMANO, THE HASTINGS CTR., UNDOCUMENTED IMMIGRANTS IN THE UNITED STATES: U.S. HEALTH POLICY AND ACCESS TO CARE (Oct. 3 2012), <http://www.undocumentedpatients.org/issuebrief/health-policy-and-access-to-care/>.
- 39 S.R. MACHLIN & F. RHODE, AGENCY FOR HEALTHCARE RES. AND QUALITY U.S. DEP'T OF HEALTH & HUMAN SERVS., HEALTH CARE EXPENDITURES FOR UNCOMPLICATED PREGNANCIES 2 (2007), [http://meps.ahrq.gov/data\\_files/publications/rf27/rf27.pdf](http://meps.ahrq.gov/data_files/publications/rf27/rf27.pdf).
- 40 See generally Alissa Quart, *Why Women Hide Their Pregnancies*, N.Y. TIMES, Oct. 6, 2012, [http://www.nytimes.com/2012/10/07/opinion/sunday/why-women-hide-their-pregnancies.html?\\_r=0](http://www.nytimes.com/2012/10/07/opinion/sunday/why-women-hide-their-pregnancies.html?_r=0).
- 41 See NWLC & A BETTER BALANCE, IT SHOULDN'T BE A HEAVY LIFT: FAIR TREATMENT FOR PREGNANT WORKERS 6 (story of Natasha Jackson, an African American woman), 11 (story of Yvette, a Hispanic woman), 13 (story of Hilda Guzman, a Hispanic woman), 18 (story of Svetlana Arizanovska, an immigrant woman) (2013), available at [http://www.nwlc.org/sites/default/files/pdfs/pregnant\\_workers.pdf](http://www.nwlc.org/sites/default/files/pdfs/pregnant_workers.pdf) [hereinafter "HEAVY LIFT"].
- 42 For more information about Guadalupe Hernandez's challenges, see *id.* at 4.
- 43 RENEE BISCHOFF & WENDY CHAVKIN, THE RELATIONSHIP BETWEEN WORK-FAMILY BENEFITS AND MATERNAL, INFANT AND REPRODUCTIVE HEALTH: PUBLIC HEALTH IMPLICATIONS AND POLICY RECOMMENDATIONS 5 (2008).
- 44 Deborah Calloway, *Accommodating Pregnancy in Workplace*, 25 STETSON L. REV. 1, 6 (1995) (discussing changes to bodily functions that occur due to pregnancy).
- 45 See HEAVY LIFT, *supra* note 41, at 13 (story of Hilda Guzman).
- 46 See REECE RUSHING, CTR. FOR AM. PROGRESS, REPRODUCTIVE ROULETTE: DECLINING REPRODUCTIVE HEALTH, DANGEROUS CHEMICALS, AND A NEW WAY FORWARD (2009), [http://www.americanprogress.org/issues/2009/07/pdf/reproductive\\_roulette.pdf](http://www.americanprogress.org/issues/2009/07/pdf/reproductive_roulette.pdf).
- 47 In 2000 people of color were the majority in neighborhoods within three kilometers of one or more commercial hazardous waste facilities. ROBERT D. BULLARD ET AL., UNITED CHURCH OF CHRIST, TOXIC WASTES AND RACE AT TWENTY 1987-2007: GRASSROOTS STRUGGLES TO DISMANTLE ENVIRONMENTAL RACISM IN THE UNITED STATES, 1 (2007), <http://www.ejrc.cau.edu/2007%20UCC%20Executive%20Summary.pdf>.
- 48 AMNESTY INTERNATIONAL, DEADLY DELIVERY: THE MATERNAL HEALTH CARE CRISIS IN THE UNITED STATES 4-5 (2010), <http://www.amnestyusa.org/sites/default/files/pdfs/deadlydelivery.pdf>.
- 49 Lisa Rosenthal & Marci Lobel, *Explaining racial disparities in adverse birth outcomes: Unique sources of stress for Black American women*, 72 SOC. SCI. & MED. 977, 977-81 (2011); Andreea A. Creanga et al. *Racial and ethnic disparities in severe maternal morbidity: a multistate analysis*, 2008-2010, 210 AM. J. OBSTETRICS & GYNECOLOGY 1.e1, 1.e6 (2014).
- 50 Creamga et al., *supra* note 49 at 1.e2.
- 51 *Id.* But see Allison S. Bryant, *Racial/ethnic disparities in obstetric outcomes and care: prevalence and determinants*, 202 AM. J. OBSTETRICS & GYNECOLOGY 335, 338 (2010) (noting that women of color do not experience such pregnancy-related at a higher rate than their white counterparts, but when they do experience such complications, they are significantly more likely to die as a result of these complications than white women).