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The Independent Regulatory Review Commission
Mr. Arthur Coccodrilli, IRRC Chairman

INDEPENDENT REGULATORY
REVIEW COMMISSION

**Subject: Availability of Emergency Contraception in Pennsylvania Hospitals,
regulation number: #10-182 (#2577)**

Dear Mr. Coccodrilli:

I was recently made aware that regulation number: #10-182 (#2577), regarding the availability of emergency contraception for Rape Victims in Pennsylvania, would provide exceptions for some hospitals. The exceptions would allow hospitals to move the traumatized women to other facilities in order for the women to gain access to the emergency contraception.

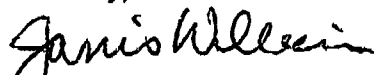
This is an undue burden to place on these victimized women. In particular, I am troubled by the following consequences which would result from this exemption:

- In many rural counties a single hospital serves a wide area. If a victim is taken to another hospital, she must not drink any liquids, eat, urinate, or defecate prior to the sexual assault exam. In rural areas this could mean a delay of many hours for both the exam and before the emergency contraception is provided. This will further traumatize the victim.
- The fact that a victim may have to wait hours to go to the bathroom after such a horrific event in her life is unreasonable.
- Emergency Contraception is most effective when administered as soon as possible after unprotected sex; as time goes by the chances of a women becoming impregnated by her attacker increase.

In addition, there is the issue of police officers who investigate the rape case itself. In a time where public resources are scarce, if a woman is moved out of the jurisdiction where she was attacked, how would this affect the police officers investigating cases that would have to travel outside of their jurisdiction? Would the Municipalities pay these officers overtime compensation if need be?

This exemption prevents the legislation from meeting a minimum standard of care for victimized women. I would like to respectfully request that you please remove this language from regulation number #10-182 (#2577). Thank you for your consideration of this most important issue.

Sincerely,



Janis Williams
202 E. Jefferson Street
Pittsburgh, PA 15212

cc: The Honorable Jake Wheatley
Sandra Knoble, Acting Director, Bureau of Facility Licensure and Certification