

RECEIVED

...the power of social work

2577

2007 OCT 15 AM 9:39

INDEPENDENT REGULATORY
REVIEW COMMISSION

October 11, 2007

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Dear Chairman Coccodrilli,

The National Association of Social Workers, Pennsylvania Chapter (NASW-PA) is commenting on final-form regulation #10-182 issued by the Department of Health addressing Sexual Assault Victim Emergency Services, being considered by IRRC on October 18, 2007. NASW-PA is a membership organization representing 6,100 social workers throughout the Commonwealth.

The final-form regulations add minimum requirements for the physical and psychological treatment of sexual assault victims by Pennsylvania hospitals. These requirements include services related to the assessment and prophylactic treatment of STDs, counseling regarding the assault on site or at a rape crisis center, and information and services related to emergency contraception.

These regulations seek to ensure increased access to appropriate medical and psychological treatment for sexual assault victims by standardizing the policies and procedures that hospitals develop for treatment of sexual assault victims.

NASW-PA commends the Department of Health for their work on the regulation to address the comments received under proposed rulemaking. The final form regulation represents compromise language for hospitals in the Commonwealth.

Victims of sexual assault are often afraid, fearful, traumatized and ashamed. Seeking emergency treatment as a victim of sexual assault takes courage. Victims should be given prompt medical and psychological treatment including information about emergency contraception and the ability to choose whether or not they would like to utilize the medications to avoid an unplanned pregnancy caused by a sexual assault. NASW PA is concerned these regulations will result in victims being turned away from some hospitals in seeking treatment of a sexual assault. NASW-PA is also concerned the final form regulations allow hospitals to opt out of providing emergency contraception for moral or religious beliefs.

A significant number of professional social workers work in hospitals delivering crisis services and as counselors at rape crisis centers across the Commonwealth. In these positions, professional social workers provide information or services to victims of sexual assault.

Sincerely,

Jamie Buchenauer

Jamie Buchenauer, Director of Government and Public Relations
NASW-PA

Cc: Sandra Knoble, Acting Director, Bureau of Facility Licensure and Certification, Department of Health
Kim Kaufman, Executive Director, IRRC