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# Women's Law Project

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Transmitted By fax (717) 783-2664 and by email to [irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

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

Re: Final Form Regulations #10-182 (#2557)  
Relating to Sexual Assault Victim Emergency Services

Dear Commissioner Coccodrilli:

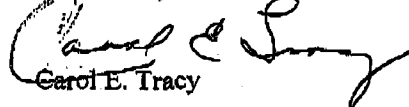
On behalf of the sexual assault survivors we serve, the Women's Law Project urges the Independent Regulatory Review Commission disapprove the Final Form Regulations Relating to Sexual Assault Victim Emergency Services submitted by the Department of Health.

The Commonwealth of Pennsylvania has a compelling state interest in minimizing the harmful effects of sexual assault and ensuring victims' safety and health, including by providing timely access to emergency contraception. By allowing hospitals to claim a religious exemption from providing emergency contraception and permitting those hospitals that opt-out for religious reasons to transport the victim to other medical providers, the regulations improperly elevate conflicting interests and considerations over those of sexual assault survivors. If a victim lives in a region of the state where the only hospital claims an exemption for religious reasons and there is no facility that can provide emergency contraception in close proximity and on a timely basis, access to emergency contraception is effectively denied.

We know of no state that has required hospital emergency rooms to provide emergency contraception that allows hospitals to opt-out for religious reasons or that permits hospitals to remove the survivor from the emergency room and transport her elsewhere rather than provide her with the care she needs. Nor is there any medical, public health or public policy reason to add any delay in getting a rape victim appropriate treatment.

Thank you for your consideration of the legitimate needs of rape survivors.

Very truly yours,

  
Carol E. Tracy

cc: Members, Senate Public Health and Welfare Committee  
Members, House Health and Human Services Committee

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A copy of the official registration and financial information may be obtained from the Pennsylvania Department of State by calling toll free 1.800.732.0999. Registration does not imply endorsement.

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