

# TAKE ACTION!

Tell the Department of Health & Human Services:  
**Put Women's Health First**

"I want to protect women's health and safety, and abortion care already is incredibly safe. The draft regulations proposed by the Department of Health and Human Services were written with extensive input from doctors, health care professionals and reproductive health experts, and they rely on evidence-based medicine. I urge the Department of Health and Human Services to continue to listen to medical experts and support sensible regulations that put women's health first. The reproductive health centers affected by these draft regulations serve thousands of NC women and families and offer a wide range of essential reproductive health services, including family planning, STD testing and treatment, life-saving cancer screenings and annual well-woman exams. The Department of Health and Human Services must put women's health and sound medical practices first when considering any changes to the draft regulations."

Name Manissa Aaron  
E-mail address difbeat@yahoo  
ZIP Code 27804

Additional Comments:

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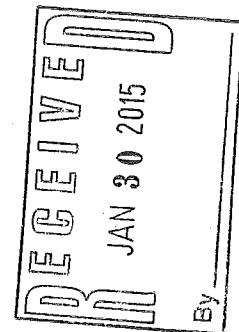
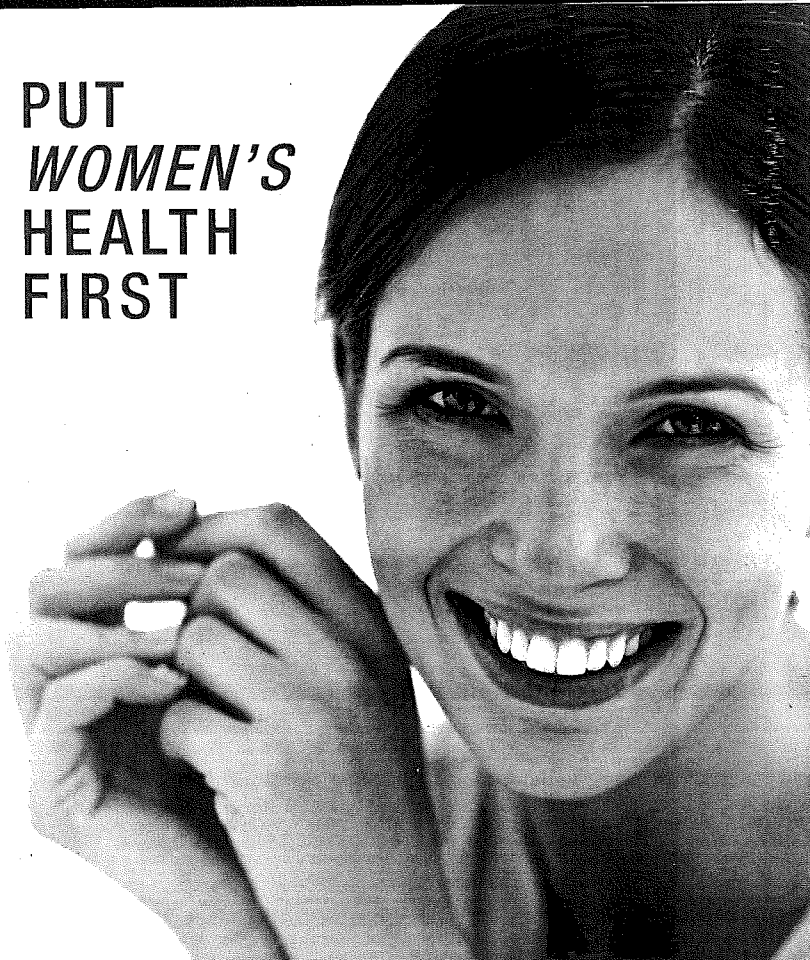
Yes, I would like to receive updates from organizations supporting this comment:

 **NARAL**  
Pro-Choice North Carolina Foundation

 **Planned Parenthood**  
Act. No matter what.

Planned Parenthood Action Fund of North Carolina

**PUT  
WOMEN'S  
HEALTH  
FIRST**



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name MARIAN ABERNATHY

E-mail address MARIAN.ABERNATHY@GMAIL.COM

ZIP Code 27705

Additional Comments:

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Name Baylee Mumatny

E-mail address \_\_\_\_\_

ZIP Code 28804

Additional Comments:

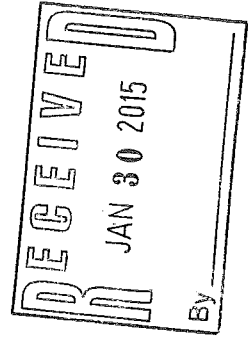
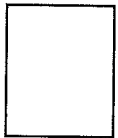
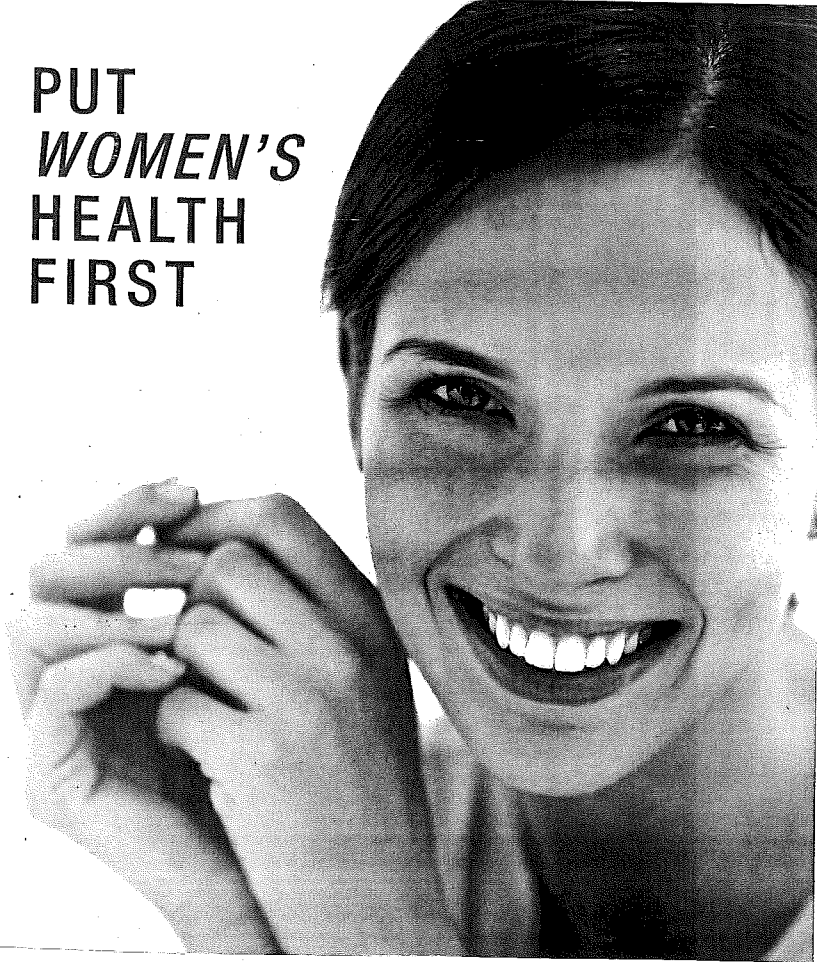
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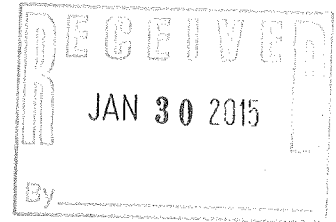
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Division of Health Service Regulation  
2701 Mail Service Center  
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Planned Parenthood Health Systems  
Action Fund, Inc.



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FIRST NAME:

LAST NAME:

Sandra

Abromitis

EMAIL:

Abromitis@msn.com ZIP: 28778

~~Abromitis@msn.com~~

~~28778~~

Optional Comment field:

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Name Ashley Shunassar  
E-mail address ashunass@unca.edu  
ZIP Code 28804

Additional Comments:

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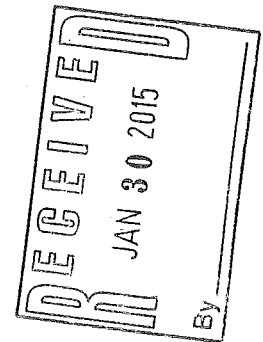
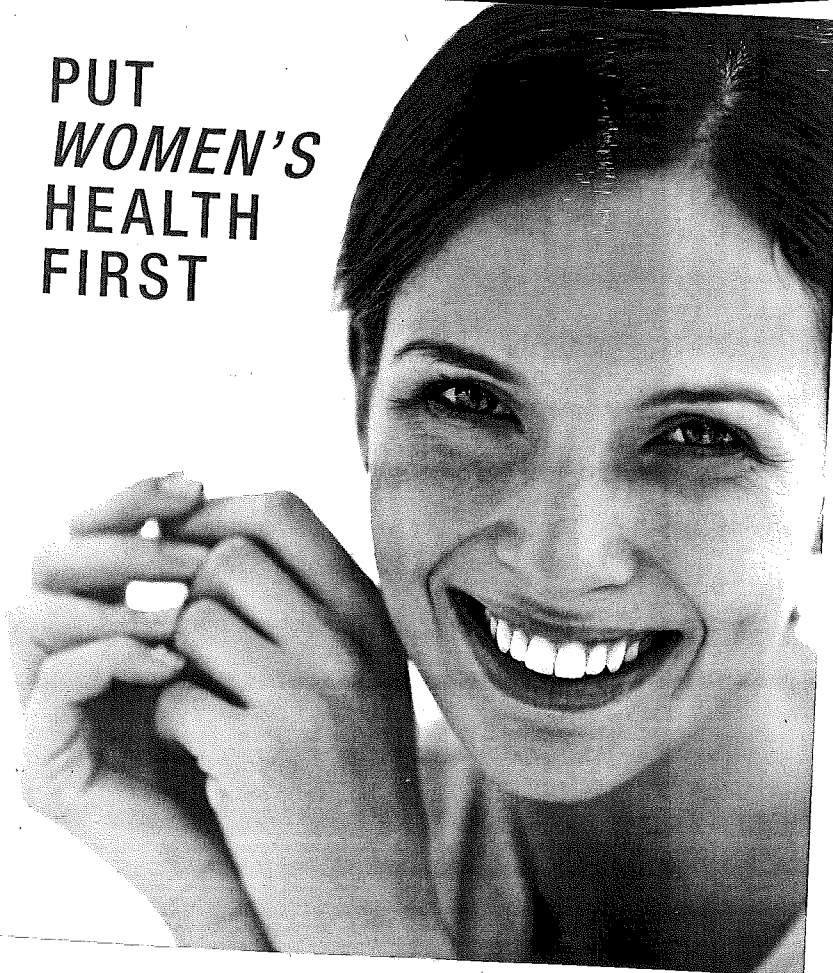
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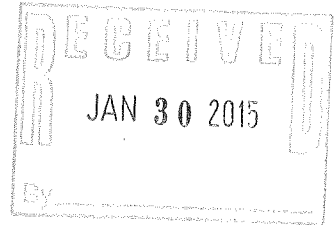
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Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



Planned Parenthood Health Systems  
Action Fund, Inc.



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FIRST NAME:

LAST NAME:

Amber

Abunassar

EMAIL:

ZIP:

aabunass@unca.edu

28804

Optional Comment field:

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JAN 30 2015

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FIRST NAME:

LAST NAME:

Sylvia Adamczyk

EMAIL:

ZIP:

sadamczyk222@gmail.com 28314

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Name Tyrelle Adams  
E-mail address tadams@unca.edu  
ZIP Code 28803

Additional Comments:

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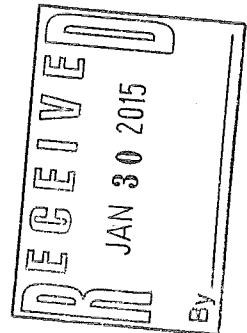
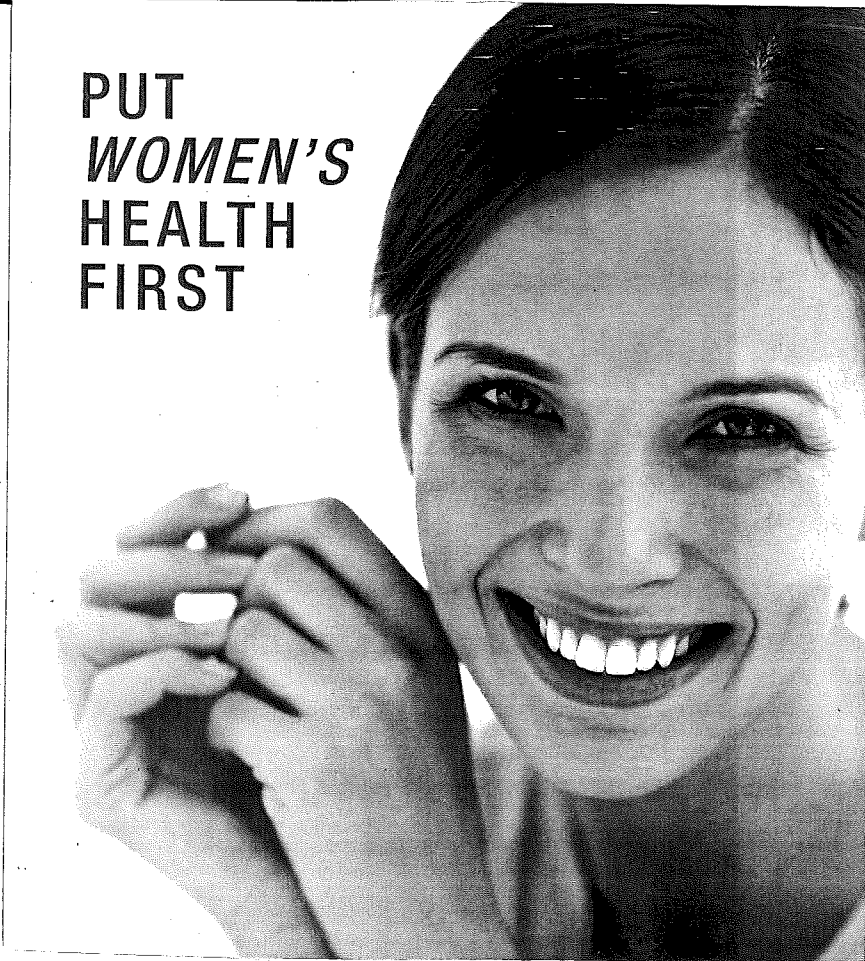
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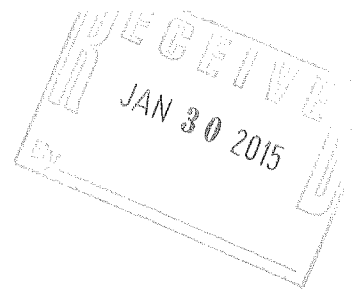


Nadine Pfeiffer  
Division of Health Service Regulation  
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FIRST NAME:

Jamie

LAST NAME:

Adler

EMAIL:

ZIP:

27510

*Optional Comment field:*

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Name Jennifer Adqui  
E-mail address jackui@gmail.com  
ZIP Code 28205

Additional Comments:

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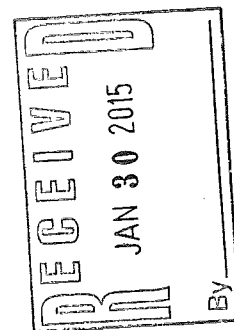
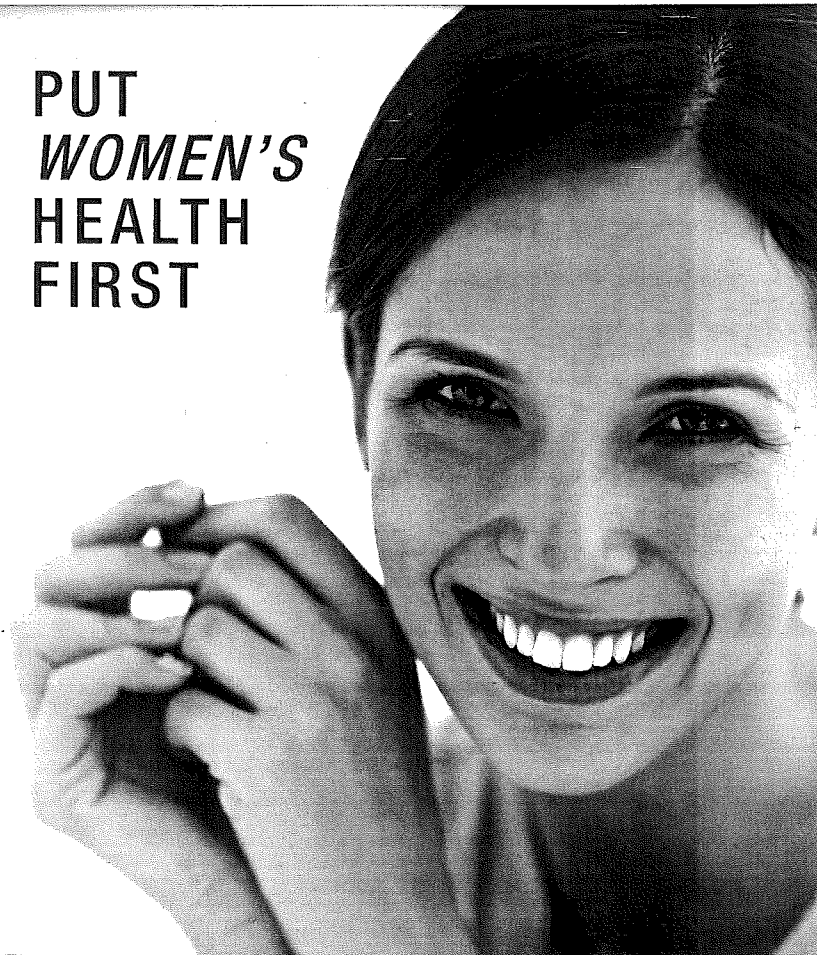
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Name CERESTINA AFFRILIS

E-mail address 140D EAST CORNWALLIS RD

ZIP Code APT 1522B DURHAM NC 27

Additional Comments:

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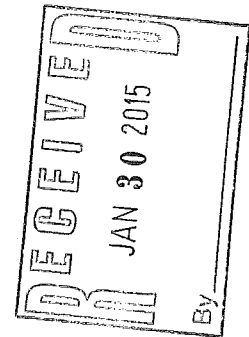
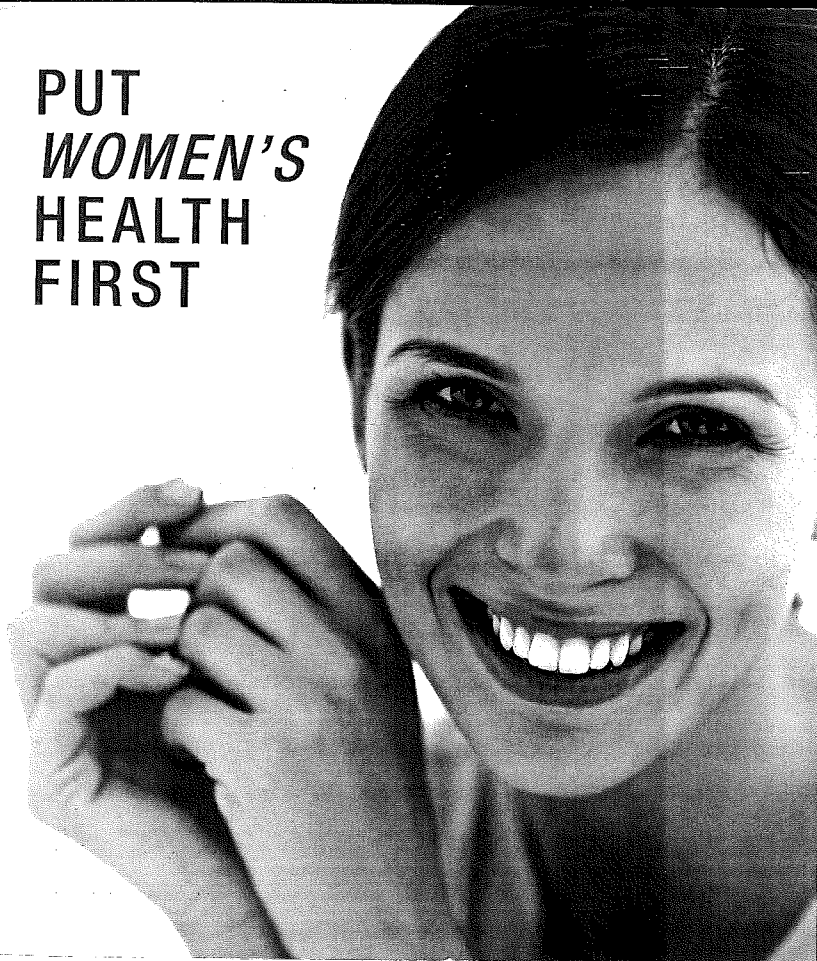


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Name Abigail Angus

E-mail address angus05@unc.edu

ZIP Code 27804

Additional Comments:

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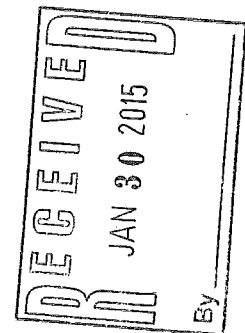
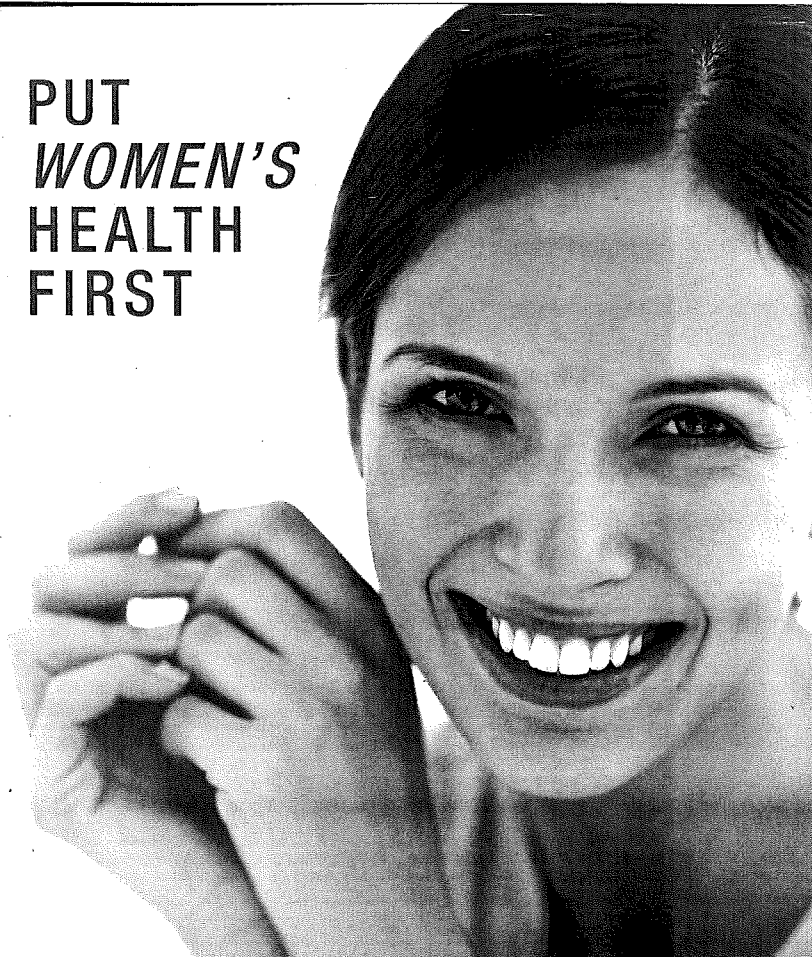


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Name Christian Agudero

E-mail address \_\_\_\_\_

ZIP Code 24092

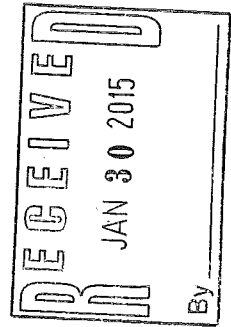
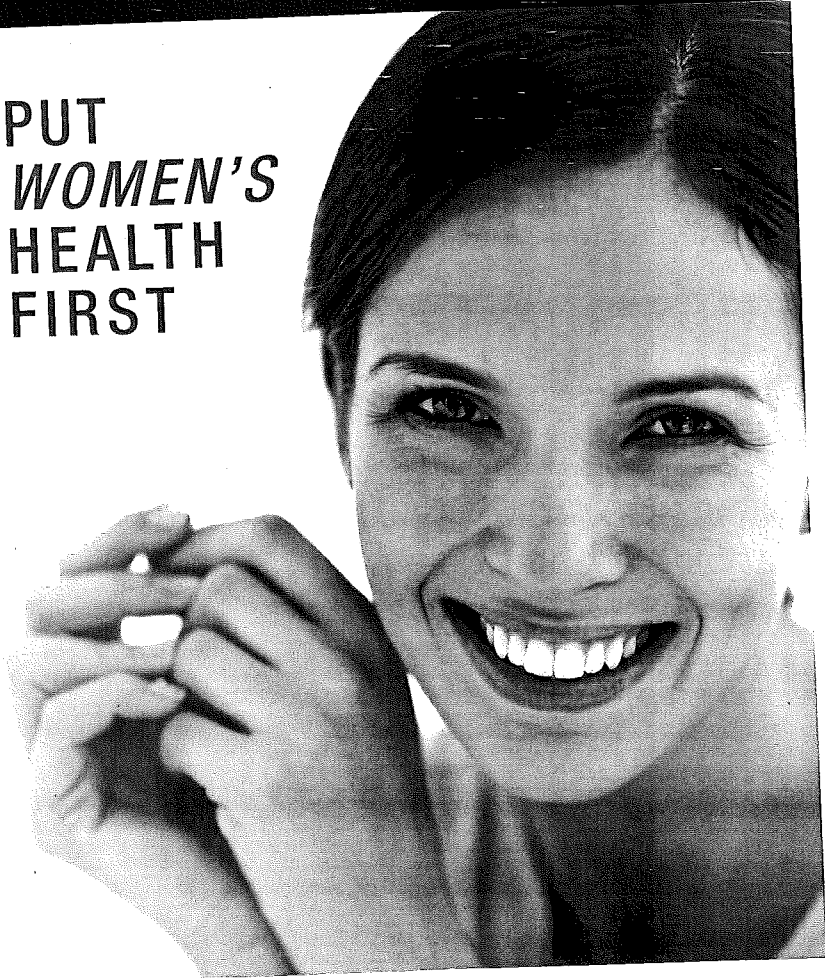
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Name Linda Aiken

E-mail address aiken2001@Frontier.com

ZIP Code 28779

Additional Comments:

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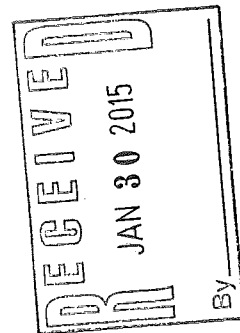
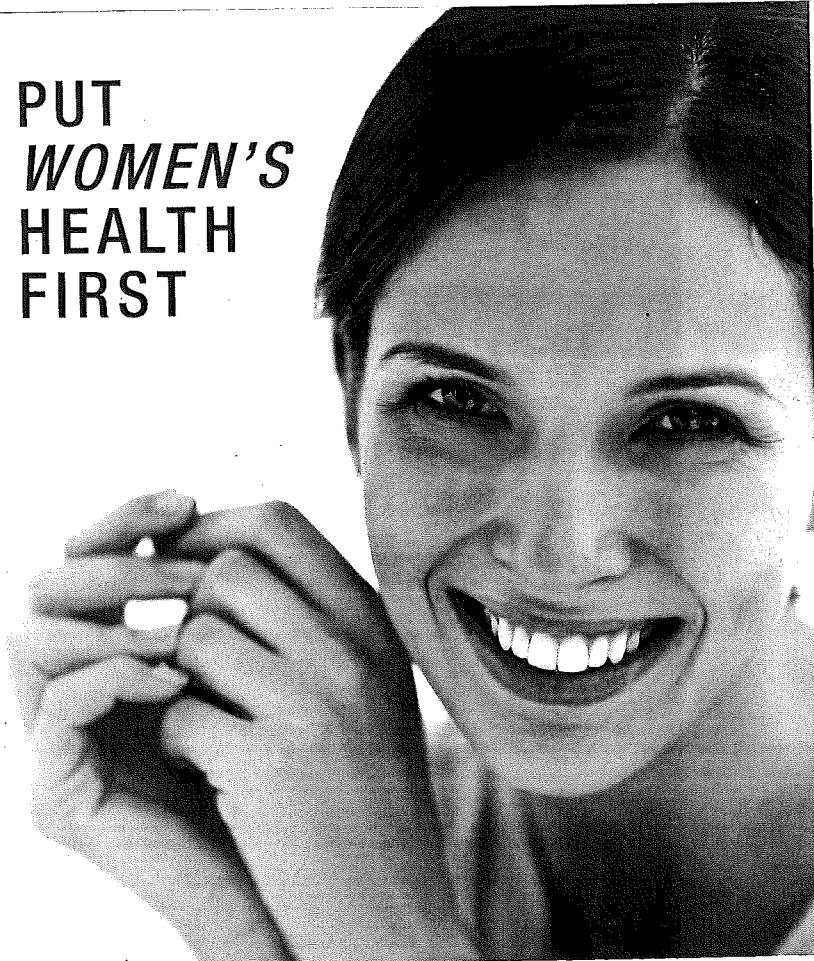
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Name Luke Hainsworth

E-mail address lhainsworth@unca.edu

ZIP Code 27889

Additional Comments:

Yo it's their bodies back off

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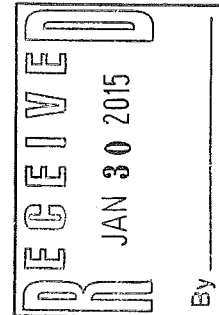


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Name Lynne Aitken  
E-mail address LaAitken@wca.edu  
ZIP Code 28226

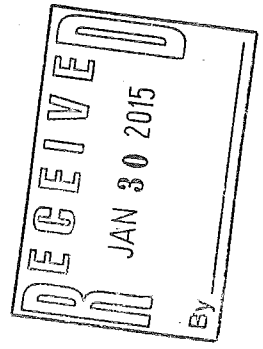
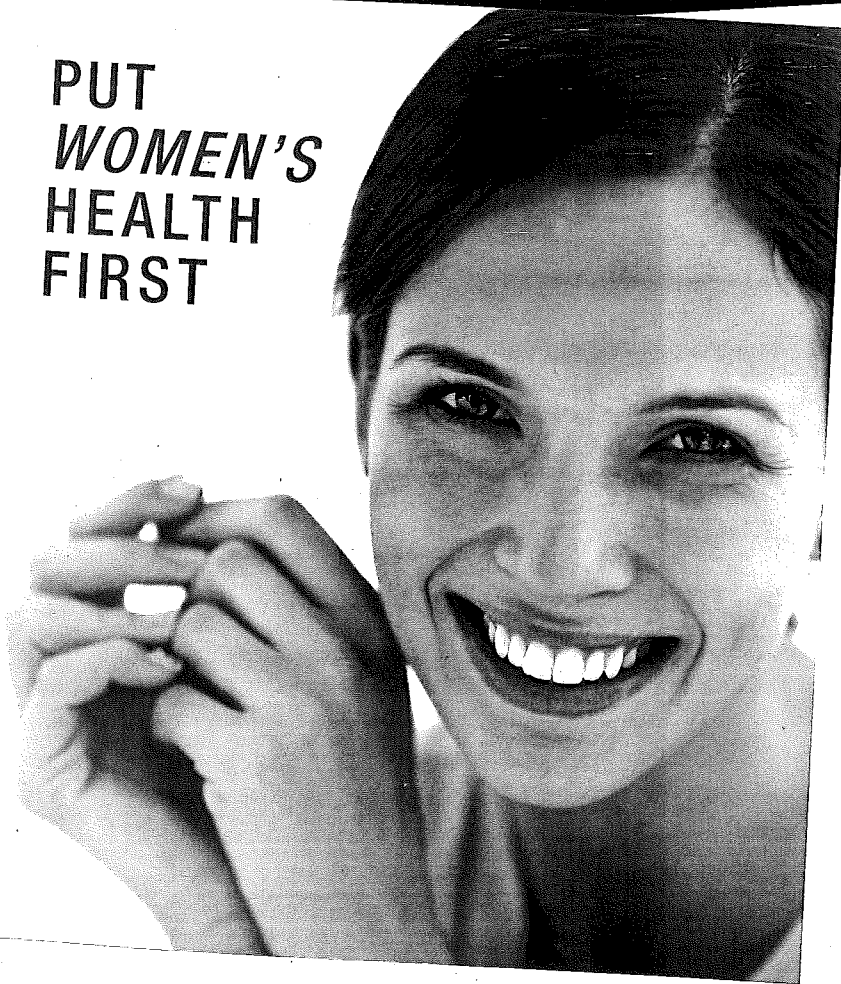
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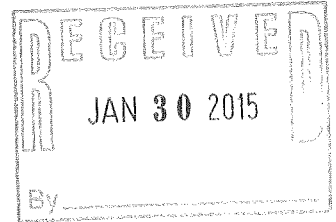


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FIRST NAME:

LAST NAME:

Hope \_\_\_\_\_ Ajayi \_\_\_\_\_

EMAIL:

ZIP:

hpajayi@gmail.com \_\_\_\_\_ 20002 \_\_\_\_\_

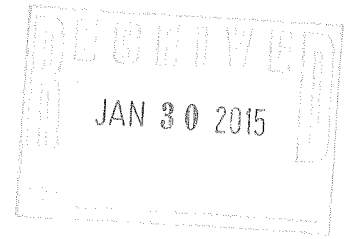
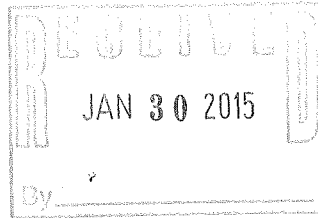
Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



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FIRST NAME:

Emma

LAST NAME:

Akpan

EMAIL:

akpan.emma@gmail.com

ZIP:

27609

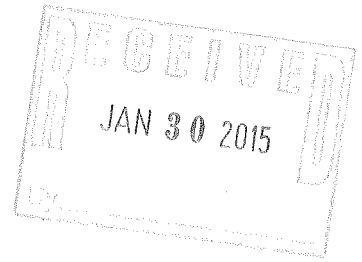
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FIRST NAME:

LAST NAME:

Morgan

Alderman

EMAIL:

ZIP:

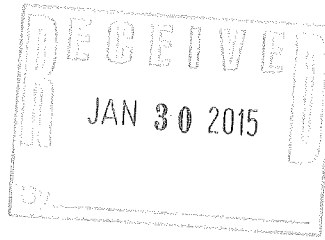
morganalderman96@gmail.com

27517

Optional Comment field:

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FIRST NAME:

*Helsey*

LAST NAME:

*Alderman*

EMAIL:

ZIP:

*27606*

*Optional Comment field:*

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name PATRICE ALEXANDER

E-mail address pea.alex123@yahoo.com

ZIP Code 27858

Additional Comments:

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Yes, I would like to receive updates from organizations supporting this comment:

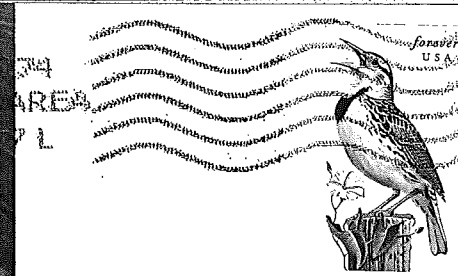
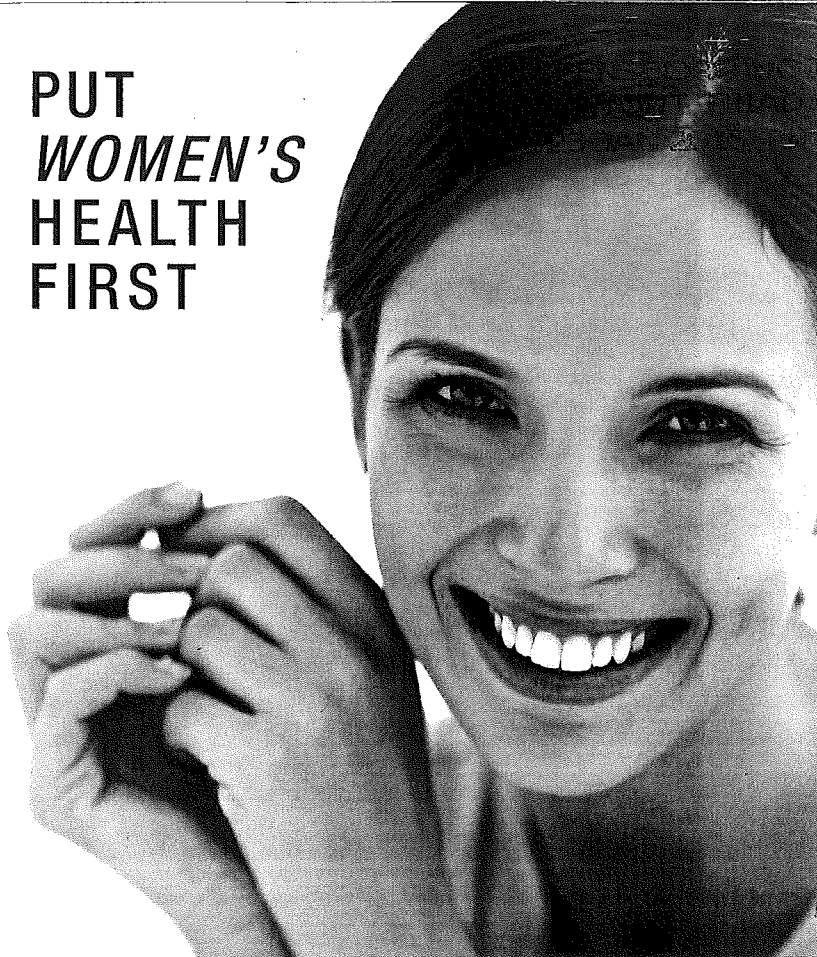


NARAL  
Pro-Choice North Carolina Foundation

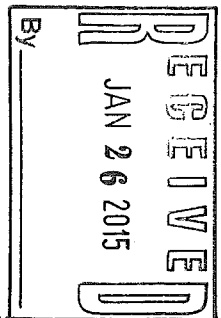


Planned Parenthood Action Fund of North Carolina

## PUT WOMEN'S HEALTH FIRST



Western Meadowlark



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Jackie Alexander

E-mail address N/A

ZIP Code 28613

Additional Comments:

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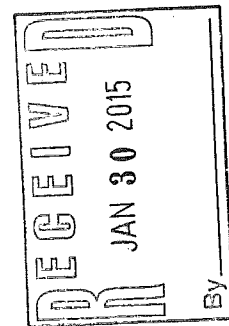
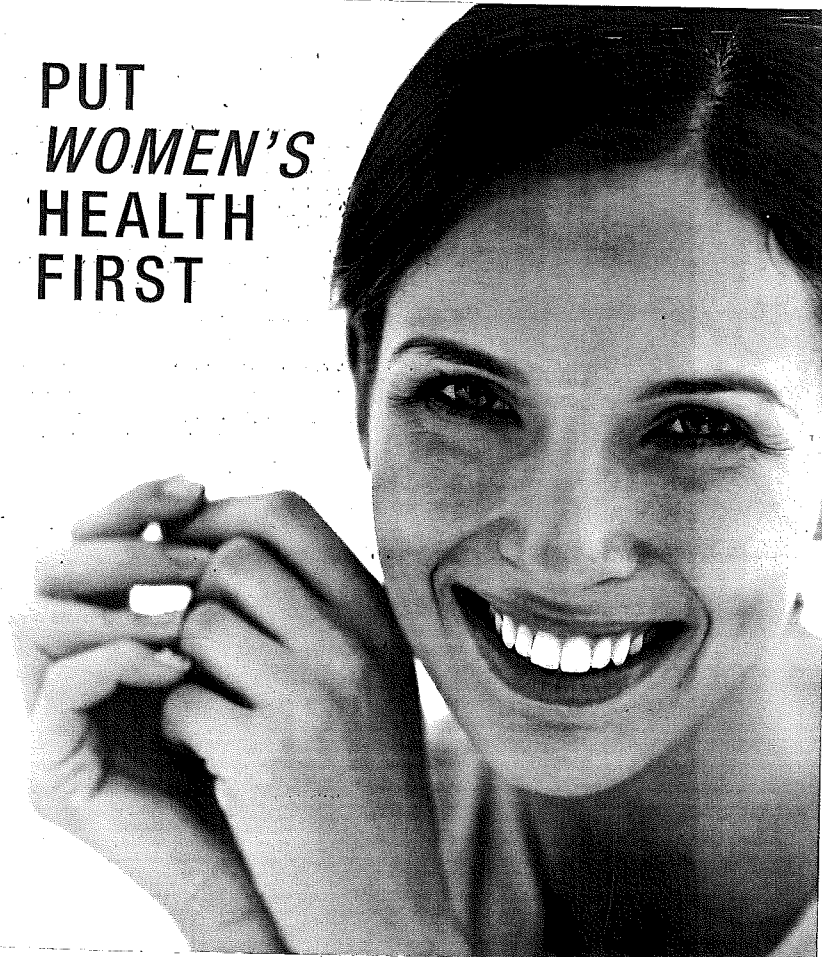
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 NARAL  
Pro-Choice North Carolina Foundation

 **Planned  
Parenthood**  
Act. No matter what.

Planned Parenthood Action Fund of North Carolina

PUT  
*WOMEN'S*  
HEALTH  
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2701 Mail Service Center  
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Name JOY ALFORD

E-mail address \_\_\_\_\_

ZIP Code 27571

Additional Comments:

women NEED  
choices, ... &  
the care is  
currently safe -  
changes are  
not needed...

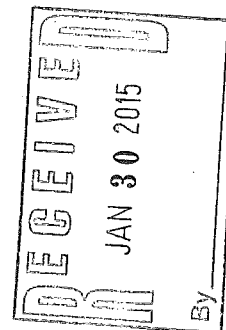
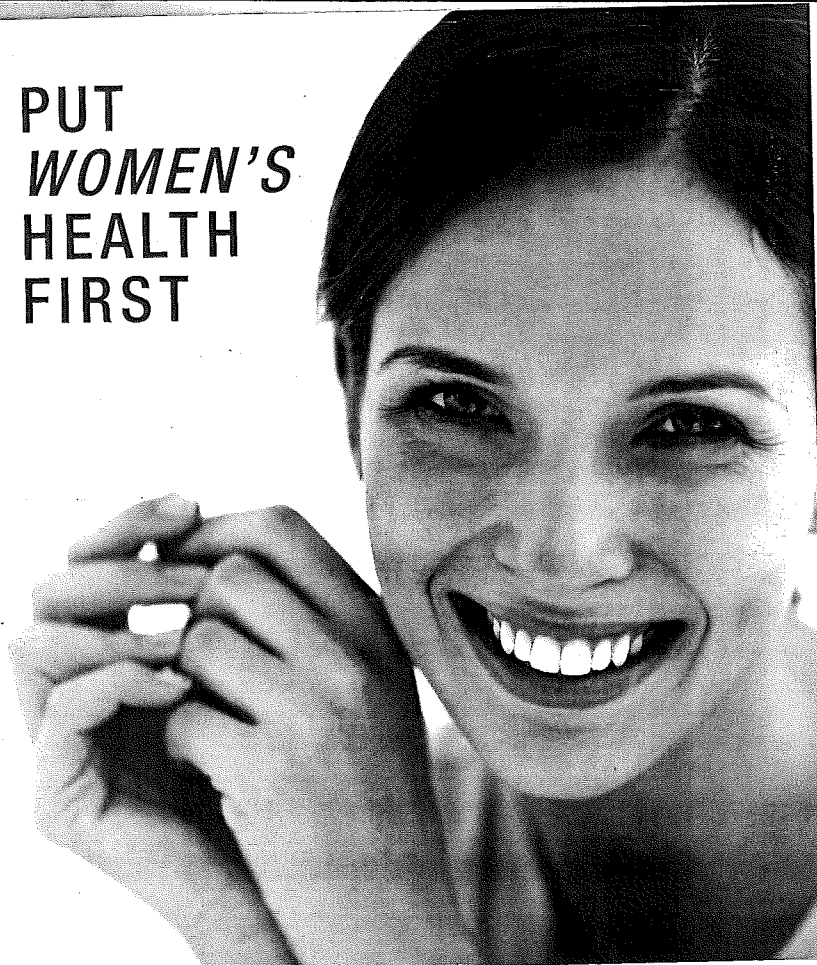
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Name Barbara K. Allen

E-mail address barbkallen@bellsouth.net

ZIP Code 27607

Additional Comments:  
You do a great job  
Thanks

Yes, I would like to receive updates from organizations supporting this comment:



NARAL  
Pro-Choice North Carolina Foundation

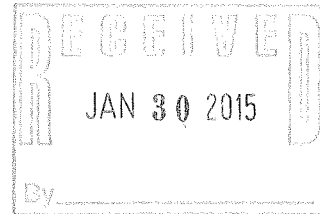


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FIRST NAME:

LAST NAME:

A Sabadella ~~Allen~~

Allen

EMAIL:

ZIP:

27214

*Optional Comment field:*

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Name Yan Aman Foh  
E-mail address Yamanfoh@mcg.edu  
ZIP Code 28273

Additional Comments:

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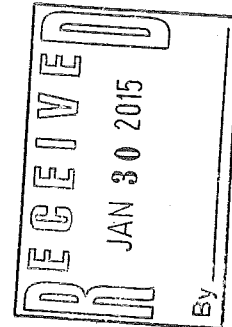
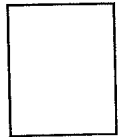
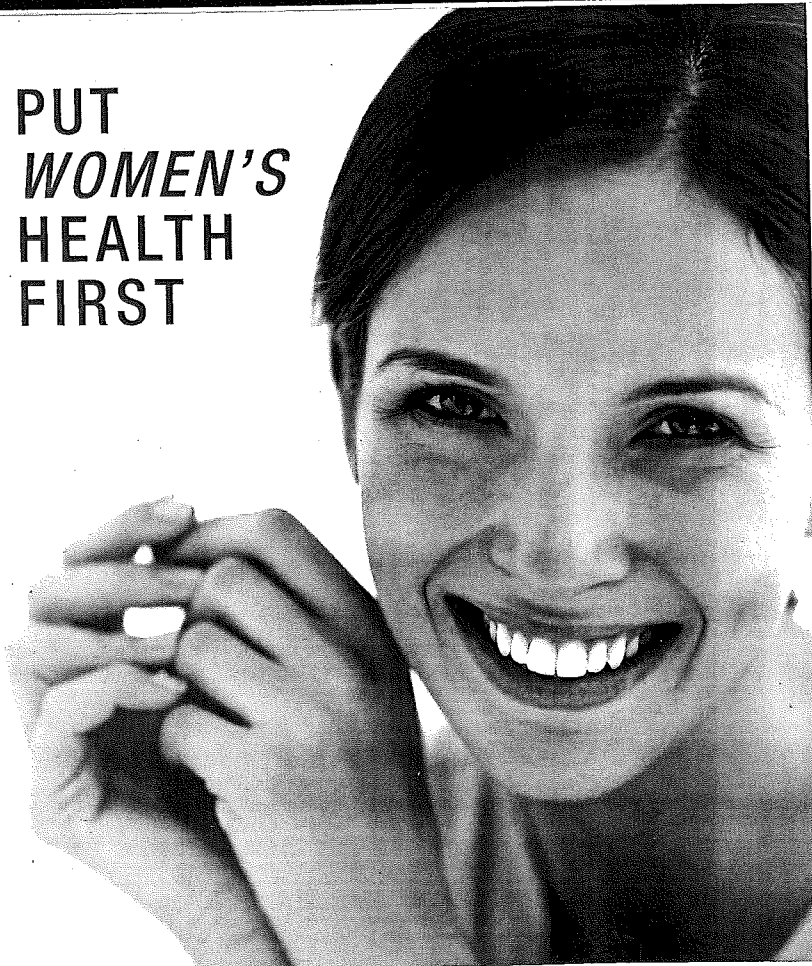


NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

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HEALTH  
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Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Christy Ambler

E-mail address \_\_\_\_\_

ZIP Code 27803

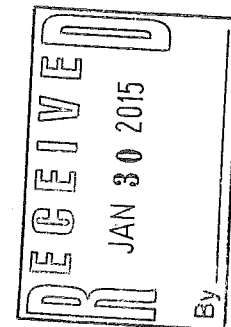
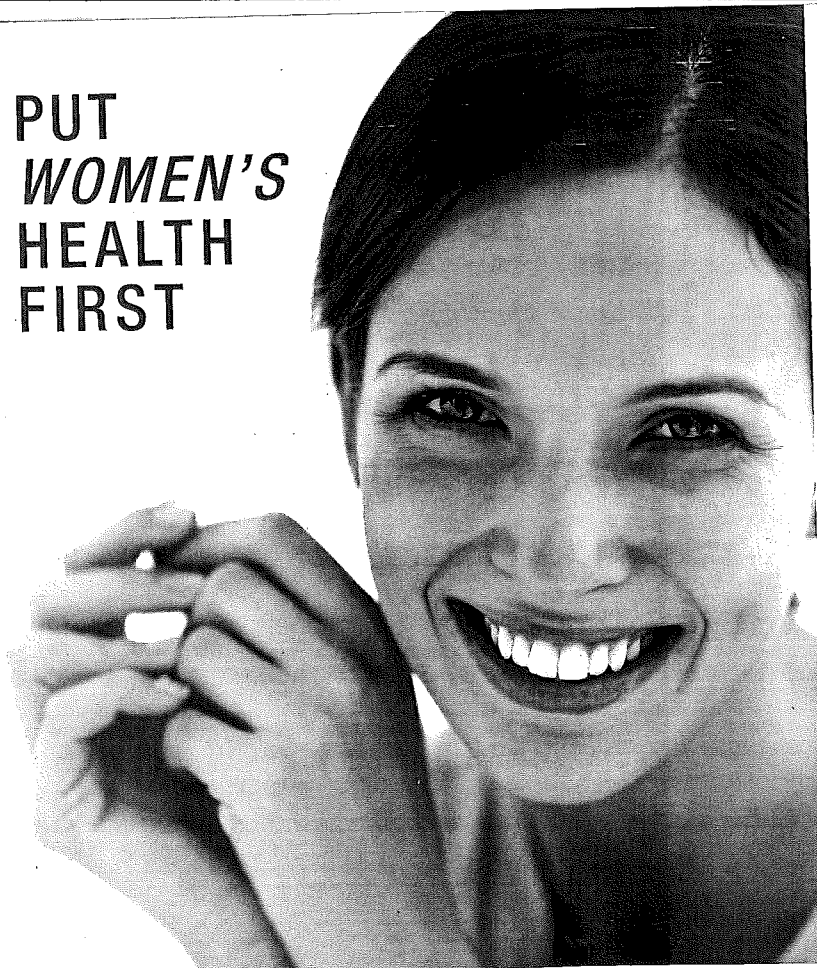
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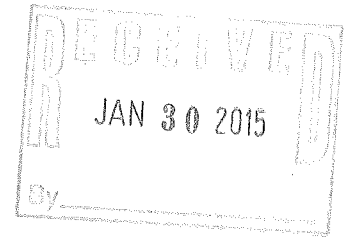


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FIRST NAME:

David

LAST NAME:

Ambros

EMAIL:

dambros@gmail

ZIP:

27514

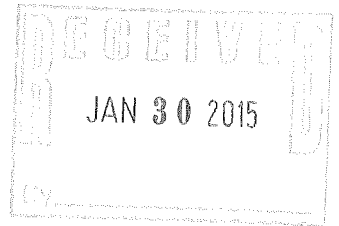
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FIRST NAME:

CAROL

LAST NAME:

AMBROSE

EMAIL:

carolambrose@mindspring.com

ZIP:

Optional Comment field:

A long time advocate for women's health care I am sad to see the clock turning back with legislative actions in NC and nationwide. Women want & deserve to have their health care.

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



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JAN 30 2015

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FIRST NAME:

LAST NAME:

Ashley

Anderson

EMAIL:

ZIP:

LoveASTB@gmail.com 28311

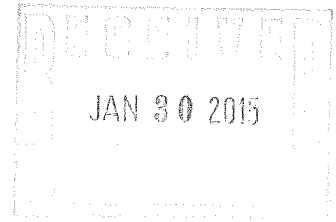
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FIRST NAME:

LAST NAME:

Zachary

Anderson

EMAIL:

ZIP:

zanders@live.edu.una

28078

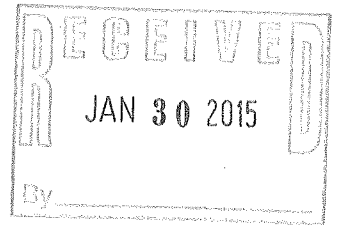
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FIRST NAME:

X

LAST NAME:

Andrew

EMAIL:

ZIP:

27502

Optional Comment field:

It's ridiculous. They shouldn't stick their nose where it doesn't belong and they should really back off

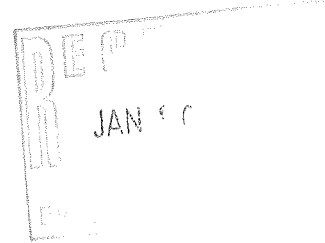
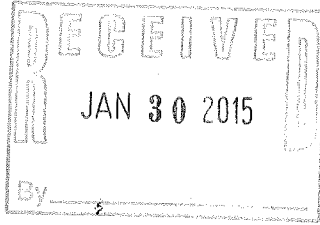
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Planned Parenthood Health Systems  
Action Fund, Inc.



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FIRST NAME:

LAST NAME:

Kimberly Rae

Andringa

EMAIL:

ZIP:

krandringa@yahoo.com

27514

*Optional Comment field:*

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Name Julie A. Angerman  
E-mail address julieangerman@gmail.com  
ZIP Code 27615

Additional Comments:

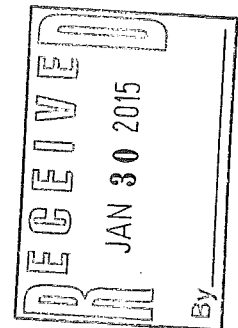
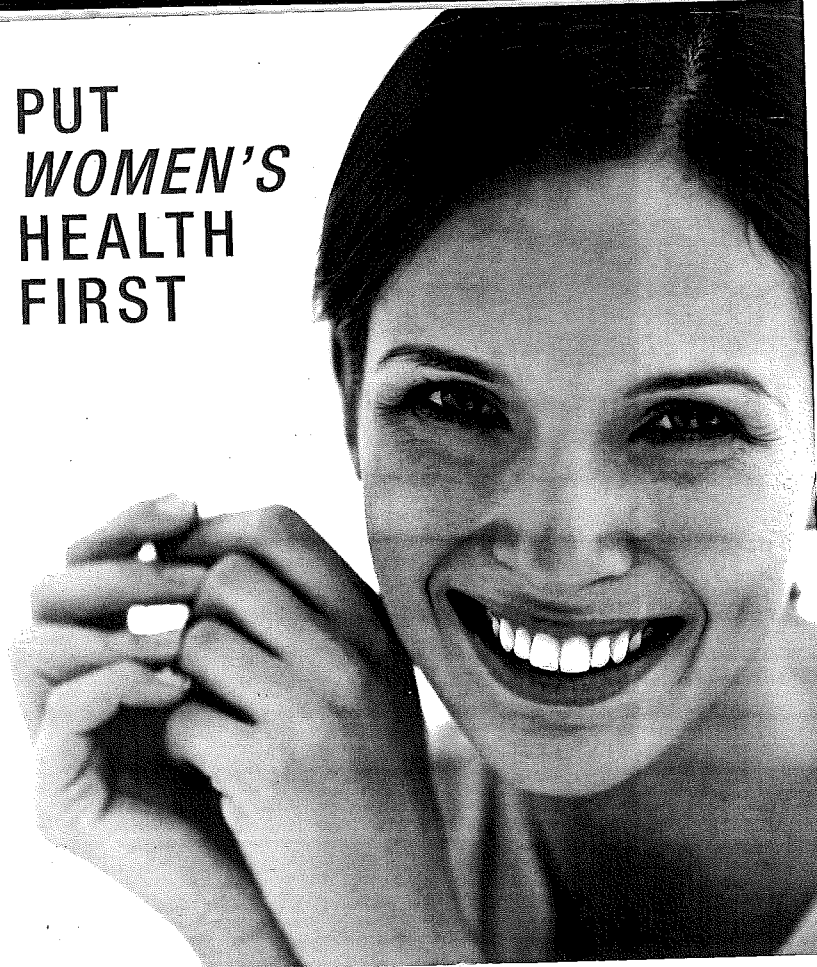
Standing On The Side  
of LOVE

Yes, I would like to receive updates from organizations supporting this comment:



Planned Parenthood Action Fund of North Carolina

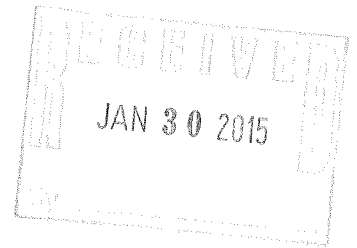
PUT  
**WOMEN'S  
HEALTH  
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Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



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FIRST NAME:

Vahan

LAST NAME:

Antaramian

EMAIL:

gojetsgo34@hotmail.com

ZIP:

28805

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Jane Annas

E-mail address jane.annas13@gmail.com

ZIP Code 28801

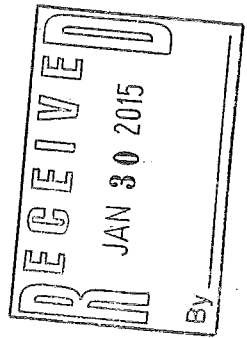
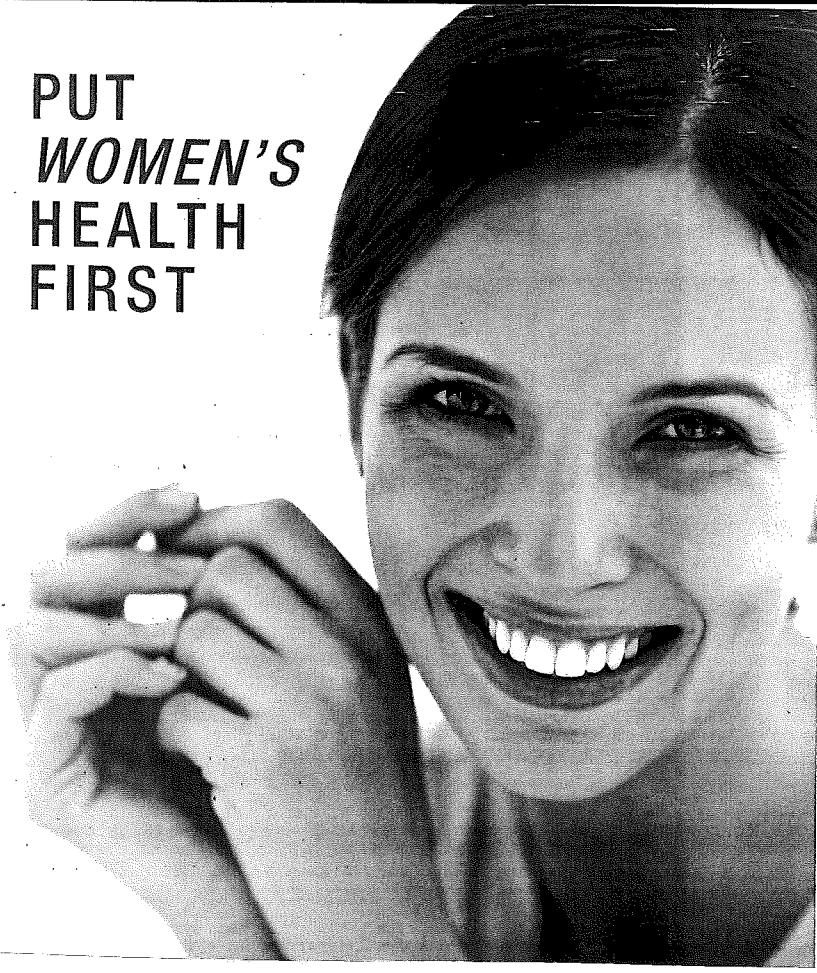
Additional Comments:  
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Yes, I would like to receive updates from organizations supporting this comment:



Planned Parenthood Action Fund of North Carolina

PUT  
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HEALTH  
FIRST**



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Fyffe Ascherbrenner  
E-mail address FyffeA@Chapel.net  
ZIP Code 28805

Additional Comments:

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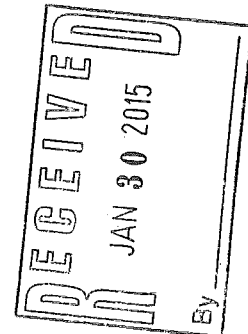
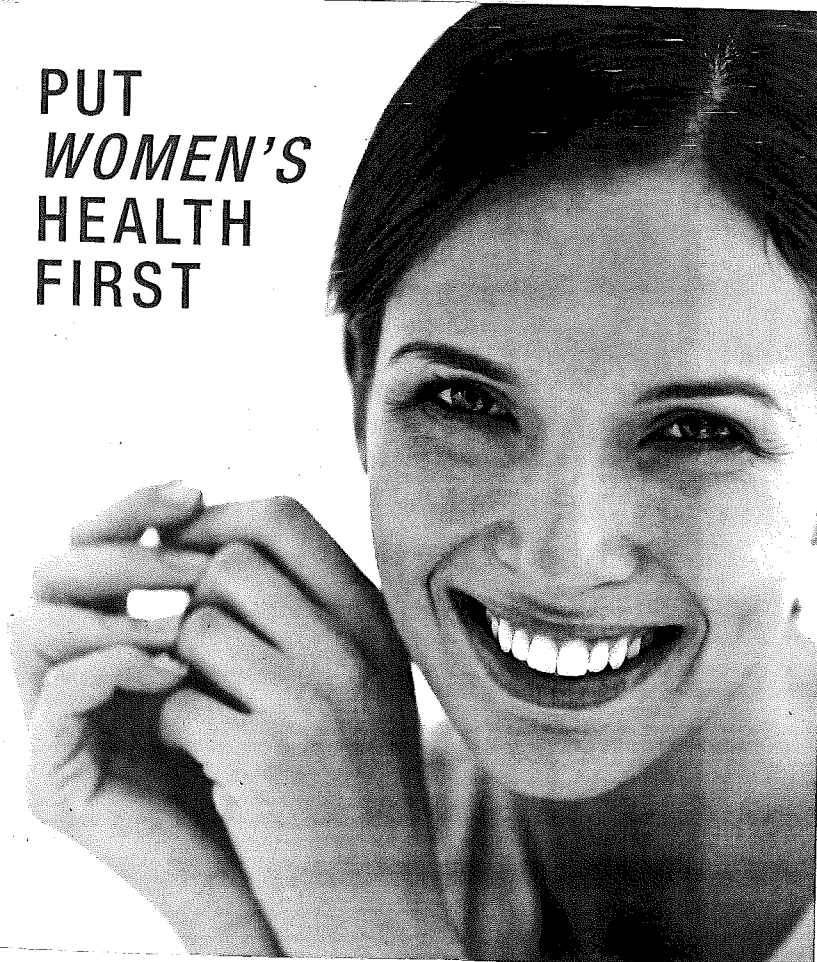
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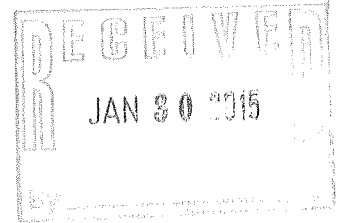
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FIRST NAME:

Jenna

LAST NAME:

Ashcraft

EMAIL:

jennaashcraft@gmail.com

ZIP:

28809

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Latasha Ashe  
E-mail address misslatasha\_09@  
yahoo.com  
ZIP Code 27707

Additional Comments:

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Yes, I would like to receive updates from organizations supporting this comment:

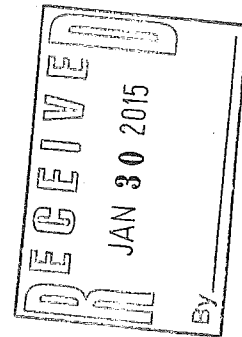
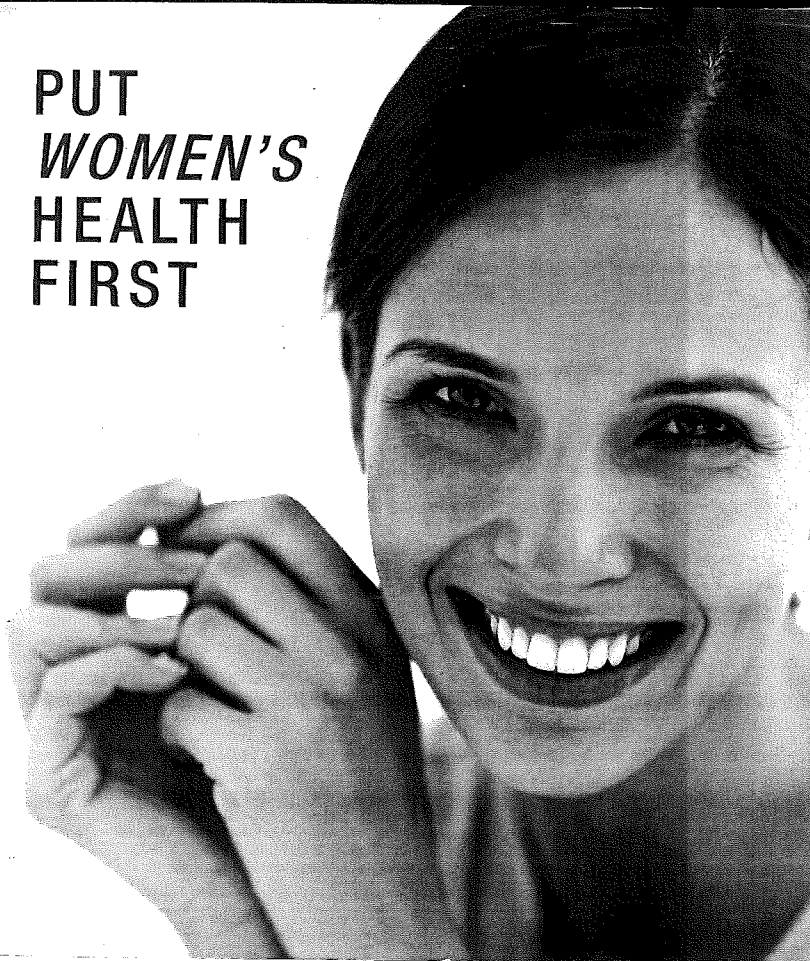


NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

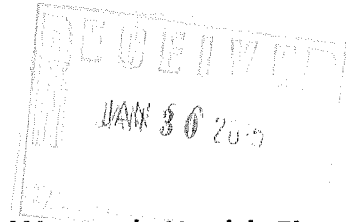
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FIRST NAME:

LAST NAME:

Stephanie

Asmussen

EMAIL:

ZIP:

Sasmussen@aol.com

27526

*Optional Comment field:*

Yes, I would like to receive updates from organizations supporting this comment.

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Name Megan Atherton

E-mail address matherto@unca.edu

ZIP Code 28804

Additional Comments:

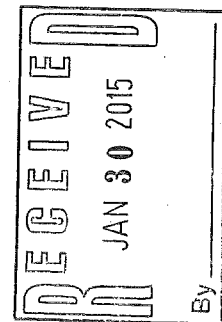
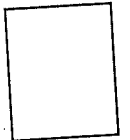
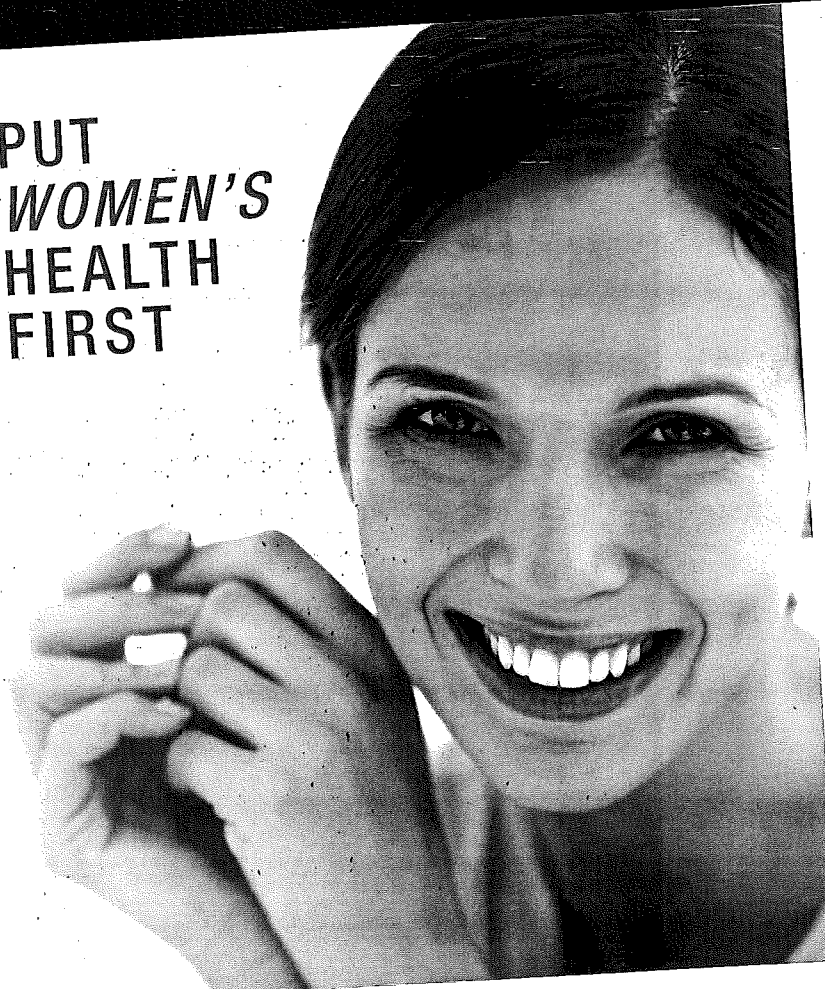
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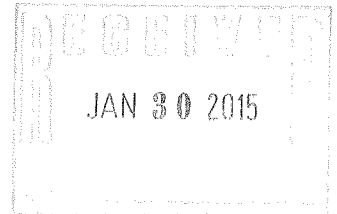
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FIRST NAME:

Ashley

LAST NAME:

Atkins

EMAIL:

atkinsae@gmail.com

ZIP:

27516

Optional Comment field:

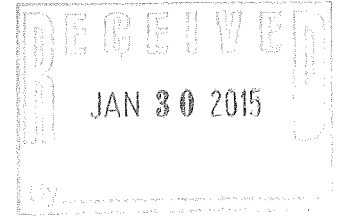
patient confidentiality is imperative —  
Thank you!

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FIRST NAME:

LAST NAME:

Rebecca

Atkins

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rebatkins@gmail.com

27514

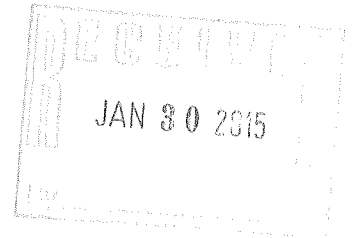
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FIRST NAME:

*Nedha*

LAST NAME:

*Atkins*

EMAIL:

*nsatkins@gmail.com*

ZIP:

*27514*

Optional Comment field:

*I support the above statements.*

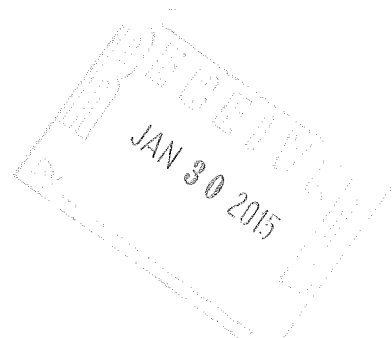
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FIRST NAME:

LAST NAME:

*Mariah*

*Auman*

EMAIL:

ZIP:

*maeauman@gmail.com*

*28753*

Optional Comment field:

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Name Alyan Auikment

E-mail address \_\_\_\_\_

ZIP Code 28804

Additional Comments:

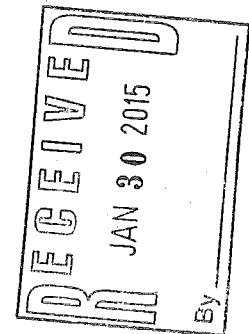
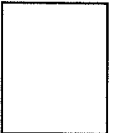
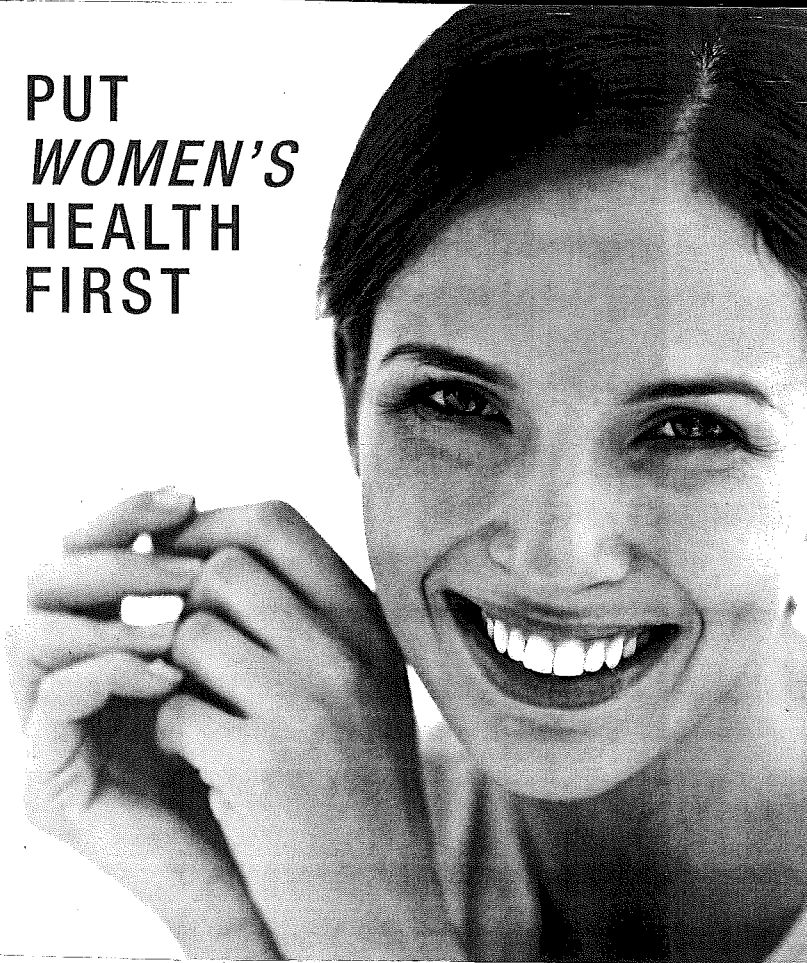
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Planned Parenthood Action Fund of North Carolina

PUT  
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Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Cathy Avery  
E-mail address ccavery1959@yahoo.com  
ZIP Code 27601

Additional Comments:

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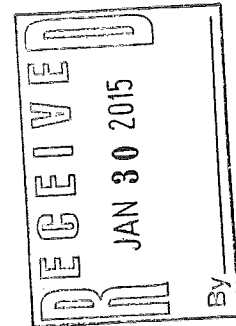
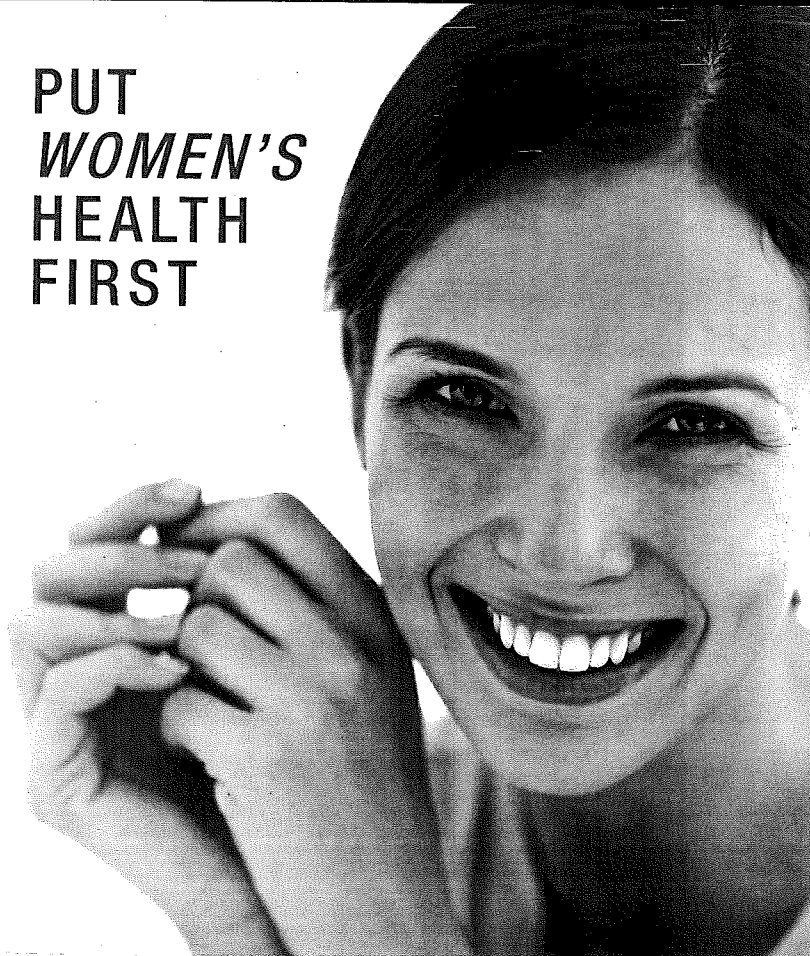
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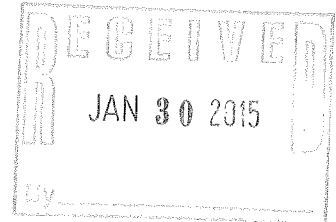
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Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



Planned Parenthood Health Systems  
Action Fund, Inc.



**Tell the Department of Health & Human Services: Put Women's Health First**

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FIRST NAME:

LAST NAME:

Matthew

Aycock

EMAIL:

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matthew.aycock1@gmail.com 28804

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



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Name Caroline Badgett

E-mail address \_\_\_\_\_

ZIP Code 27804

Additional Comments:

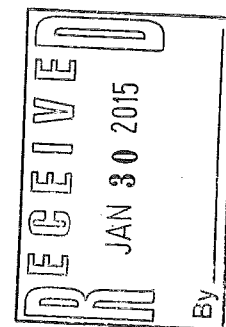
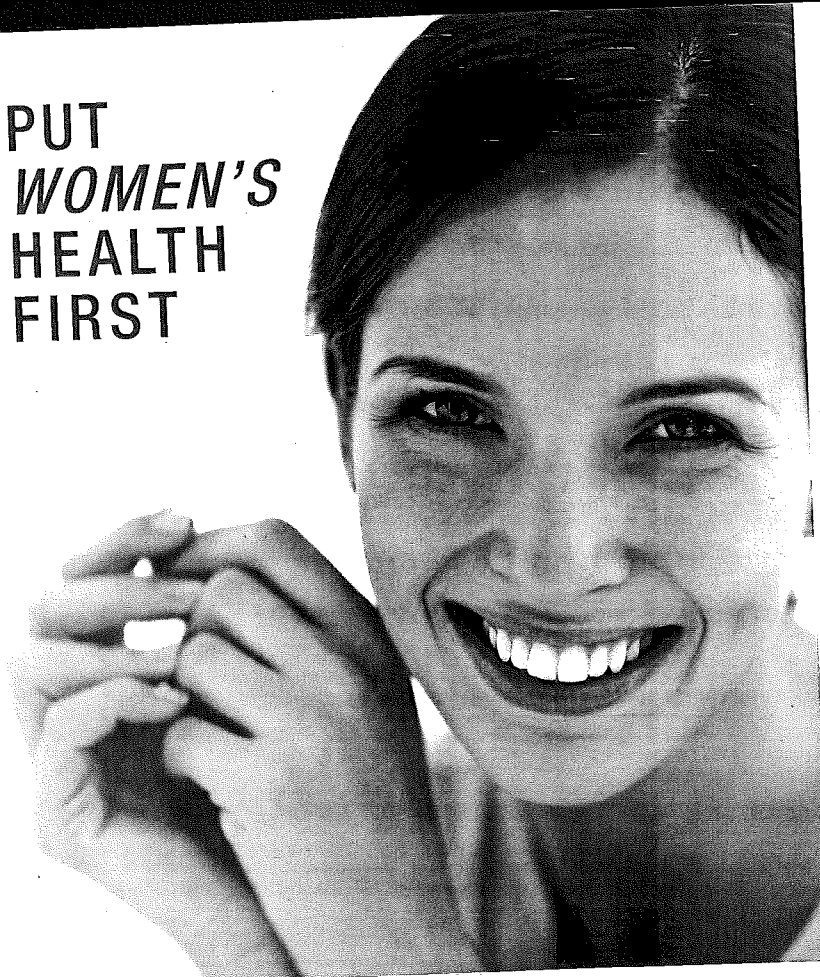
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Planned Parenthood Action Fund of North Carolina

**PUT  
WOMEN'S  
HEALTH  
FIRST**



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Jihae Baek  
E-mail address bjihac2016@gmail.com  
ZIP Code 28204

Additional Comments:

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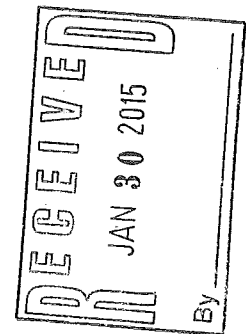
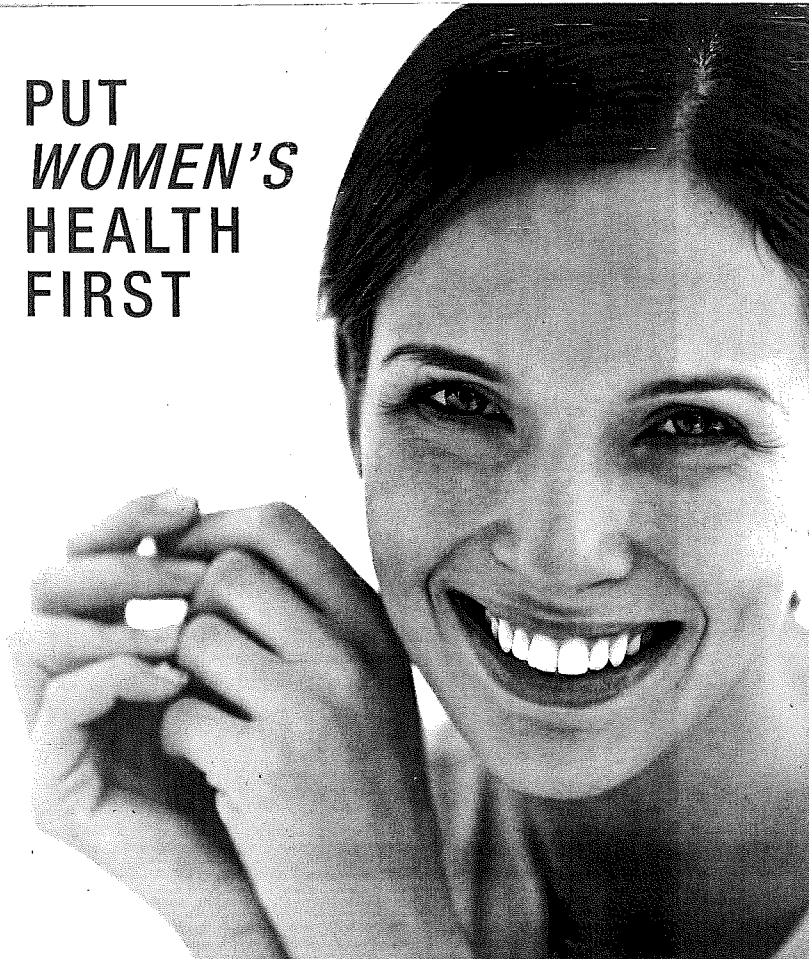
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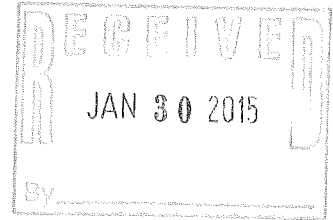
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FIRST NAME:

LAST NAME:

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Brier

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Jocelyn16@yahoo.com

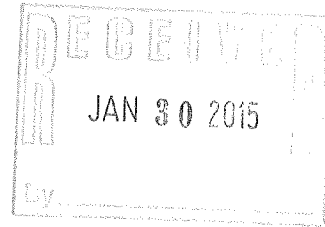
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FIRST NAME:

LAST NAME:

Payton

Bagley

EMAIL:

ZIP:

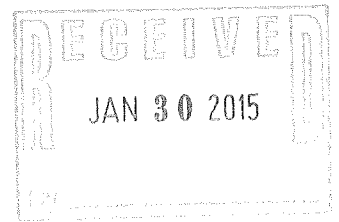
payton.bagley@gmail.com

27606

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FIRST NAME:

*Candace*

LAST NAME:

*Bailey*

EMAIL:

ZIP:

*27708 277587*

*Optional Comment field:*

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Name Adam Baker

E-mail address Abaker992@gmail.com

ZIP Code 21117

Additional Comments:

It's no ones place to dictate  
some ones movements, actions,  
& decisions.

Yes, I would like to receive updates from organizations supporting this comment:

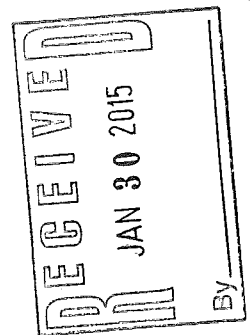
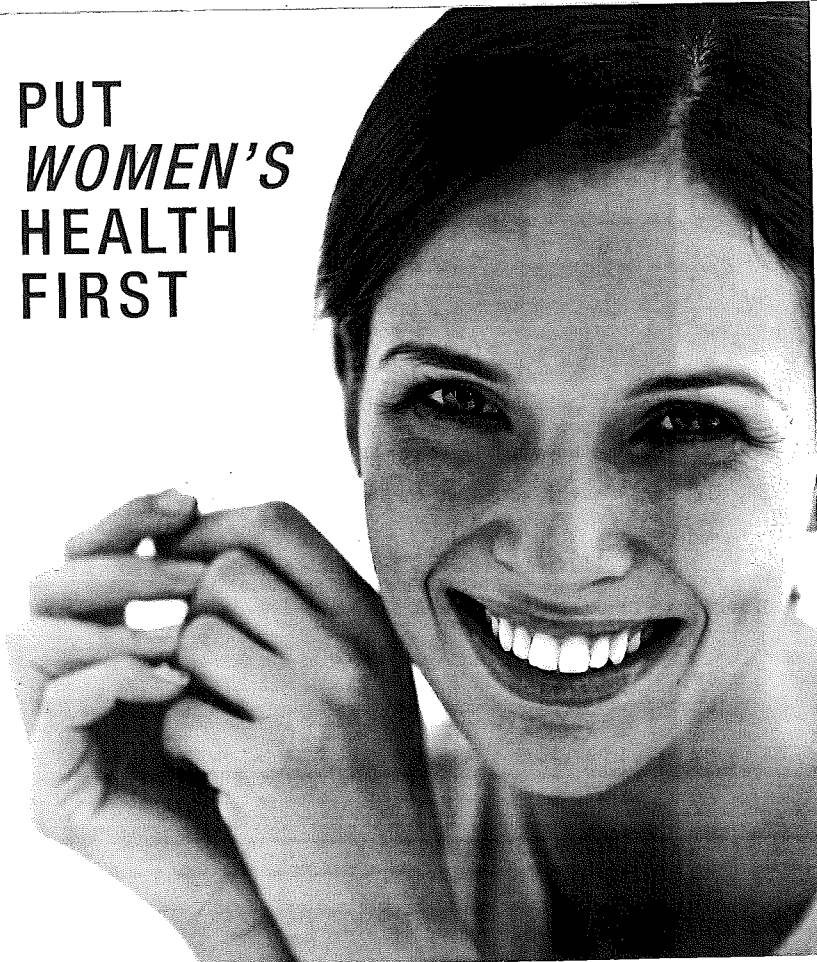


NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

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Name Linda Baker


E-mail address \_\_\_\_\_

ZIP Code 27607

Additional Comments:

I agree with your statement

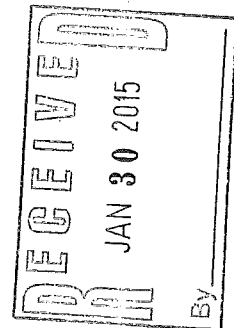
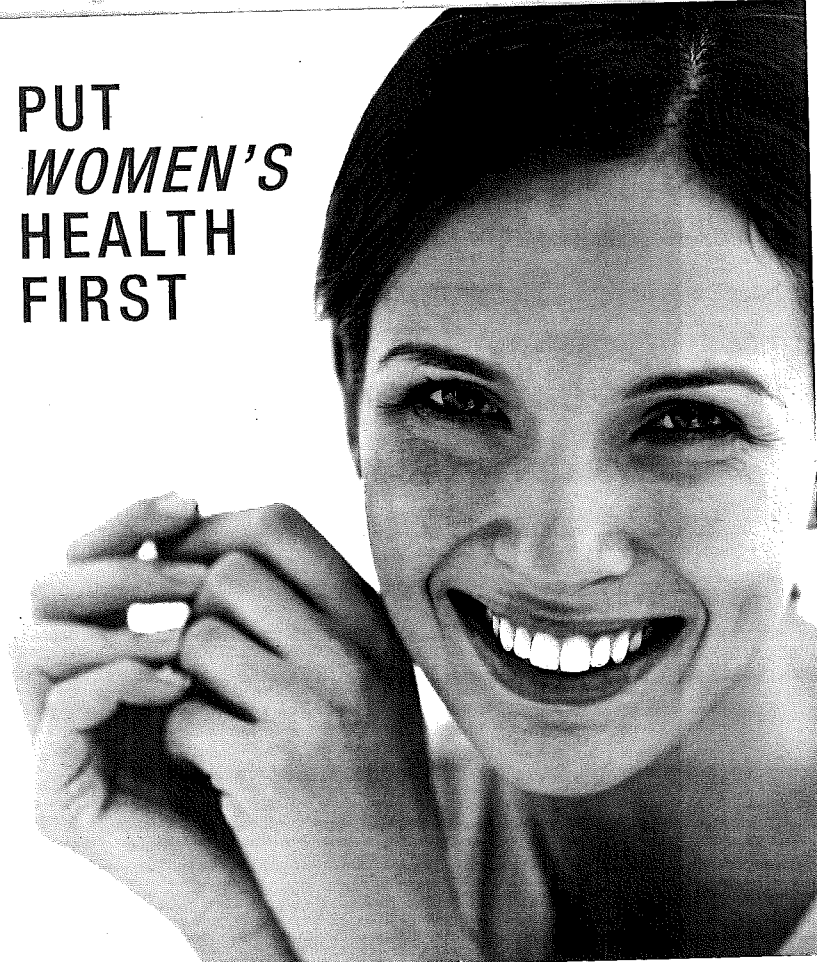
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 **Planned Parenthood**  
Act. No matter what.

Planned Parenthood Action Fund of North Carolina

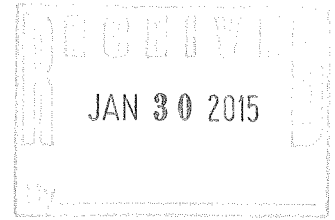
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FIRST NAME:

*Ann*

LAST NAME:

*Baker*

EMAIL:

ZIP:

*27517*

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Name Kit Ballew  
E-mail address Kitballew@cool.com  
ZIP Code 27514

Additional Comments:

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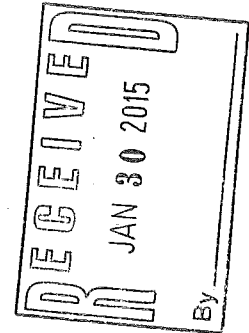
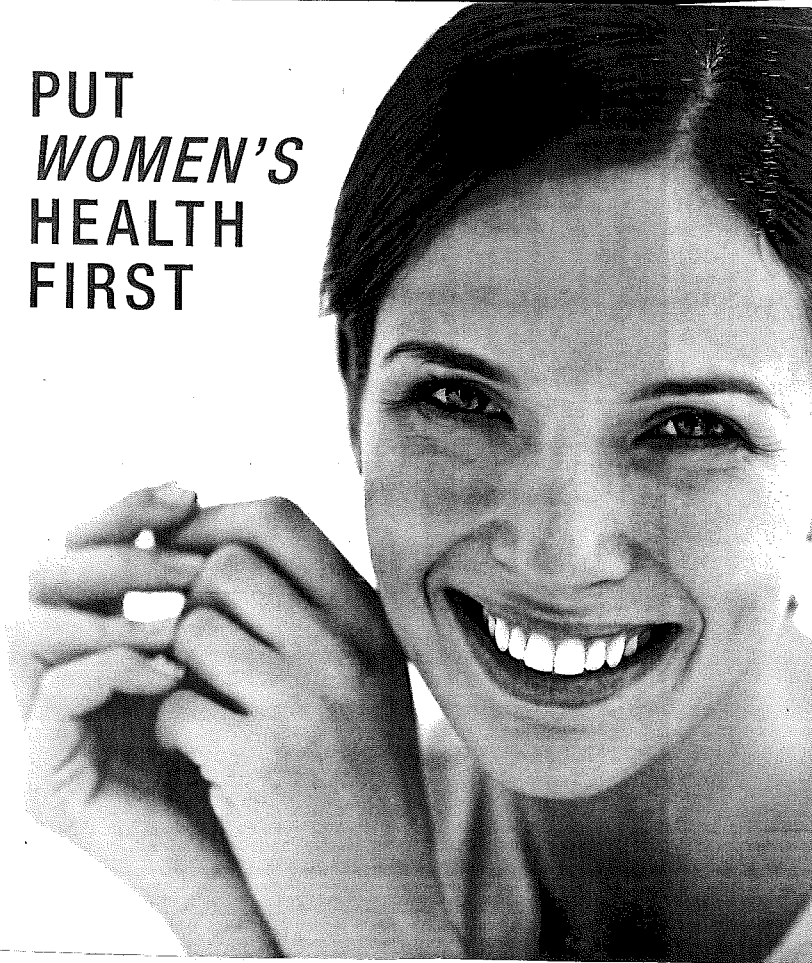


NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

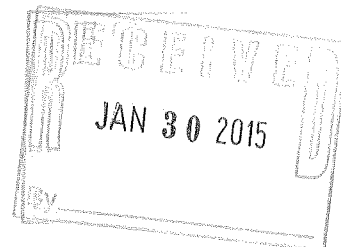
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FIRST NAME:

Betsy

LAST NAME:

Bancraft

EMAIL:

bancraft27514@yahoo.com

ZIP:

27514

Optional Comment field:

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Name Mary Banman  
E-mail address marybanman@gmail.com  
ZIP Code 27803

Additional Comments:

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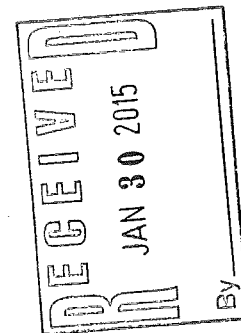
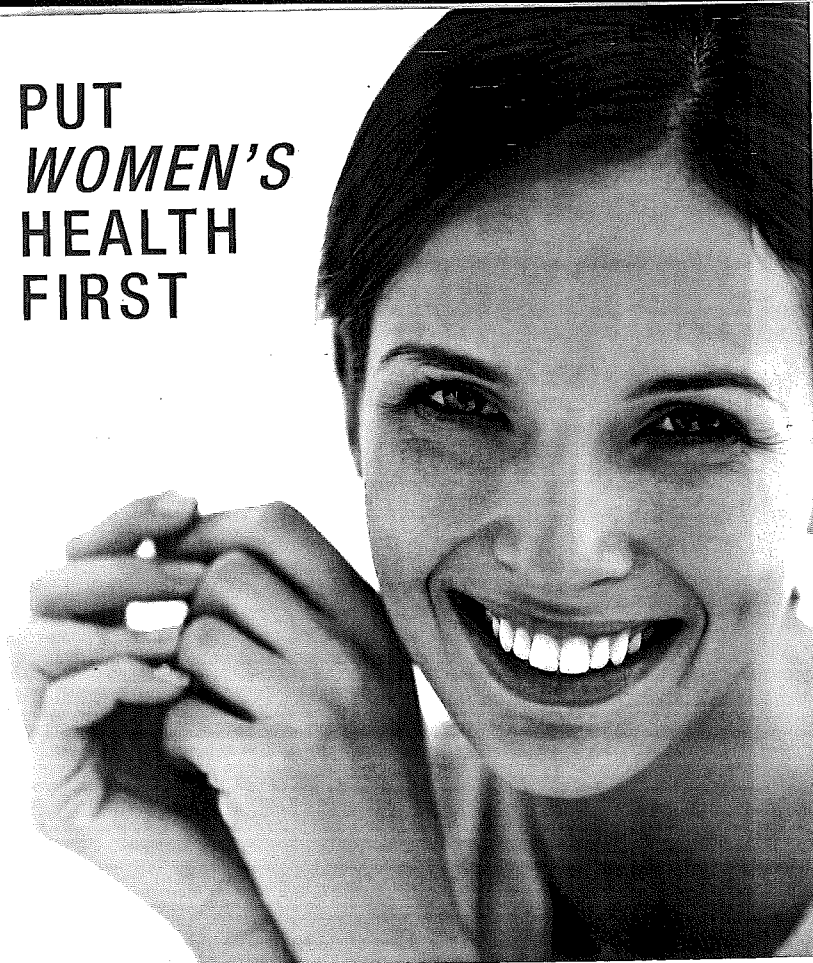
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Wendy Banister  
Gateway  
Pregnancy &  
Sexual  
Health  
Resource  
Center

Kimberly  
& Emily

Kerria

Aborted  
at home  
9 weeks  
- was unable  
to access her  
abortion provider  
for help -

Drexell Pratt

IOANCAE 14E 0101 . 0104 . 0107  
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302 - 311  
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Wendy Banister

ABORTION CLINIC STANDARDS

66% of our clients w/an abortion in their history reported emotional difficulty and/or regret. Only 34% reported that abortion was a good decision for them. stats from 2006 - 2014

Real Accounts: Since March 2014 - Nov 2014

1. One young couple who came to Gateway, decided to proceed with the abortion. In a follow up phone call with us, Julie told us that immediately following her abortion procedure she was vomiting and crying. Her boyfriend was called back to take her out another exit and not through the front door and that she was hustled into his car with the kidney bowl and a towel
  - a. Julie was not given recovery time following the procedure
  - b. She felt rushed out of the clinic while in a state of emotional and physical impairment
  - c. The abortion clinic did not call her to follow up and see if she got home safely or was feeling better
  
2. Another client, Justine told us that she had had to be hospitalized following a botched abortion procedure. She did not provide us with any further information other than that statement, saying that it was an awful experience that she wanted to forget.
  
3. Tamika inquired at an abortion clinic for information on abortion but felt unsatisfied with the limited information she was given. She felt it to be insufficient in order for her to make an informed decision about abortion. She came to Gateway and was able to get the information she was seeking with regards to the risks and procedures associated with an abortion decision.
  - a. Girls want to know this piece of the puzzle, and we would all agree that it's should be every woman's right to have access to any and all information regarding their health and reproductive decisions.
  - b. Many site insufficient education on the risks and procedures from the abortion clinics
  
4. Sharna called Gateway following her abortion, asking to speak to a nurse and complaining that she had been experiencing bleeding and pain for a few months following her abortion procedure. Sharna's concern was a possible incomplete abortion.
 

Although she had returned once to the abortion clinic on her own initiative, there was still no relief and she was seeking alternate help.

  - a. Gateway immediately referred her to the Emergency room
  - b. To our current knowledge, Sharna has not received any further follow up initiated by the abortion clinic to assess her current condition
  - c. Examination of the remains of the aborted fetus is one health and safety requirement that could possibly alleviate the above situation

5. "Mary came to Gateway to complete the WRTK education and but then chose to go to the abortion clinic for the ultrasound. Her concern was to know if her pregnancy was viable.

In a follow up phone conversation Mary had with our Nurse Manager, Mary shared that while at the abortion clinic she asked to see the u/s and the abortion clinic staff refused to show her. Mary then asked if they could tell her if there was a heartbeat or not and was told "we don't do that here". How do I know if this pregnancy is viable if you won't share that information with me?"

Mary admitted that she felt rushed towards the procedure and she was shown no compassion or understanding by the staff at the abortion clinic, with little time to process her decision especially since the information that she had hoped for and asked for was not given to her.

Mary stated that had she been able to see "her baby" that she may well have changed her mind and she said she immediately regretted her decision and was crying and in distress following the procedure.

Despite her emotional condition and obvious distress, she was quickly discharged, and was still uncontrollably crying when asked to leave.

**Mary was alone** and she **drove home alone** in that fragile condition. There had been no clinic requirement that she be accompanied for her procedure or that she should have someone to drive her home following the procedure.

#### ISSUES –

- No recovery time or privacy for Mary or provision for her emotional response to the procedure
- No apparent standard that required her to be accompanied for the procedure in order to provide safe travel home following – or if there was, then it was not adhered to.
- Mary was asked to leave while still in an obviously emotionally distressed state with the clinic knowing she would be driving herself home.
- Insufficient information for Mary to make an informed decision and she said she was deprived of the information regarding the procedure that she was asking for prior to making a major health decision.
- Mary is not being provided with post abortion support.

If there are any 50 + folk in the room here today you'll know what I'm talking about

Wendy went for a colonoscopy and

- I was required to bring a support person with me to drive me home

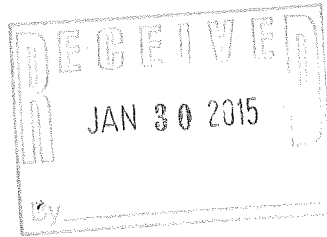
- The procedure was fully described, verbally and in writing both prior to my actual appointment then again at the clinic.
- I was treated with respect and had every question I asked answered.
- Following the procedure I was provided with a private space in which to recover, given warm and sympathetic nursing care by the clinic staff
- The clinic was clean, peaceful and well equipped
- I was handed information on what to expect when I went home
- I was given images of my beautifully healthy colon – I didn't even have to ask for them but at least I know that the outcome of my procedure and the good bill of health I was given was documented and communicated with me. They are after all, my health records.
- When I **was ready** to leave the GI clinic was when I was discharged
- I was driven home and received a follow up phone call that evening by the clinic nurse
- I felt totally cared for and knew that the clinic and the doctor performing the procedure were taking total responsibility for my well-being and that they also provided responsible follow up care.

#### QUESTION:

- Is there any reason why any of us here today should be satisfied with anything less when it comes to a procedure that is uniquely a "woman's only" procedure?
- What is the fear in elevating health and safety standards for women choosing abortion?
- \* • We should be demanding the very best of health and safety standards and unfortunately that has not been the experience of many "real" women here in NC
- As someone who is pro woman, I find these standards to fall way short of protecting the women of our state when they are at their most vulnerable.
- I would ask you to reconsider these standards, if not for you, then for the sake of your own daughters and granddaughters.



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FIRST NAME:

LAST NAME:

Lacy Barber

Barbee

EMAIL:

ZIP:

lacy1130@gmail.com

27606

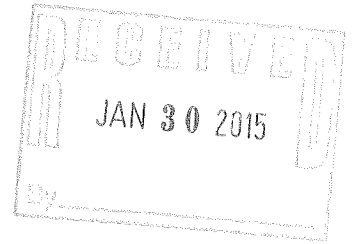
Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



Planned Parenthood Health Systems  
Action Fund, Inc.



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FIRST NAME:

David

LAST NAME:

Barber

EMAIL:

david.barber@aol.com

ZIP:

27606

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



# TAKE ACTION!

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Name Edla Babham

E-mail address barbhamr@bellsouth.net

ZIP Code 28226

Additional Comments:

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Yes, I would like to receive updates from organizations supporting this comment:

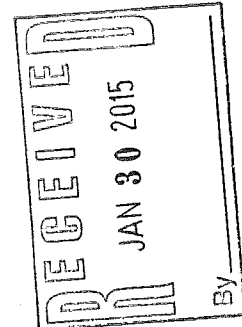
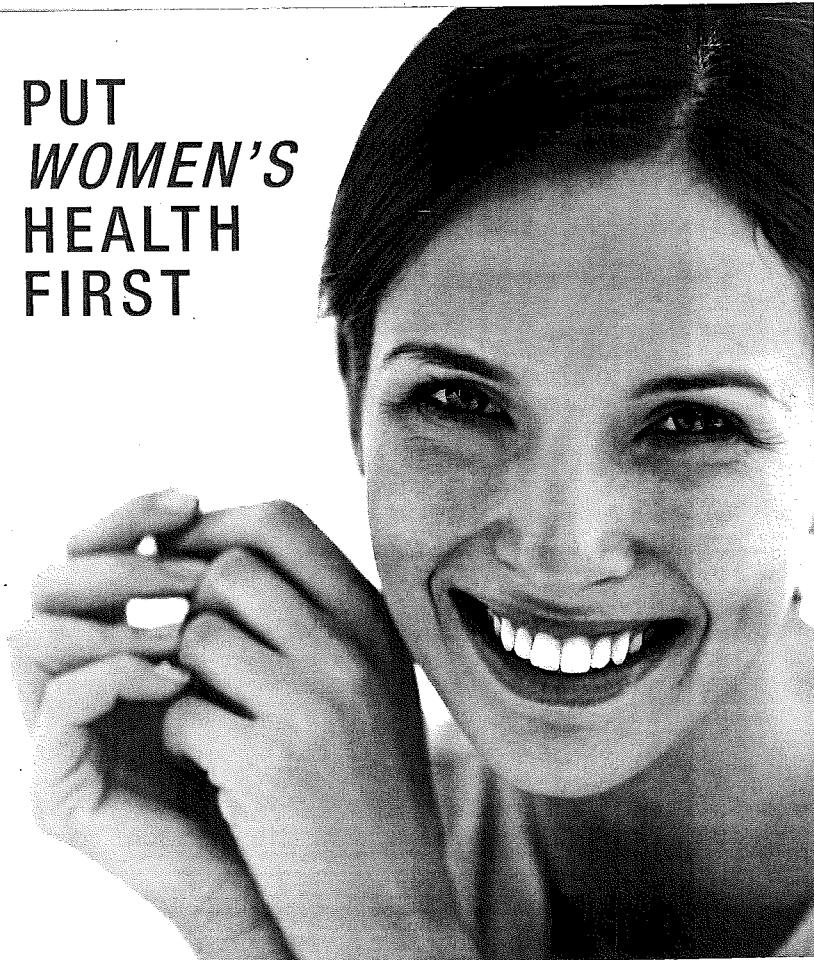


NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

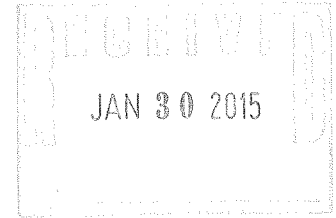
PUT  
*WOMEN'S*  
HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



Planned Parenthood Health Systems  
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FIRST NAME:

Barbara

LAST NAME:

Barbour

EMAIL:

ZIP:

27603

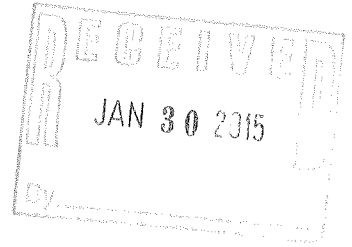
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FIRST NAME:

Beverly

LAST NAME:

Bard

EMAIL:

bgbard@hotmail.com

ZIP:

27265

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

# TAKE ACTION!

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Name Barbara Baren  
E-mail address barbarab@nc.rr.com  
ZIP Code 27707

Additional Comments:

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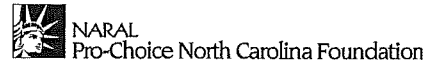
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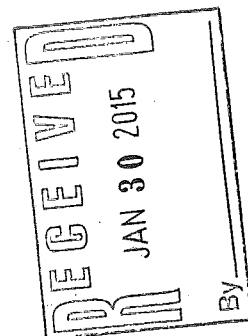
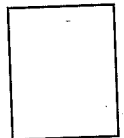
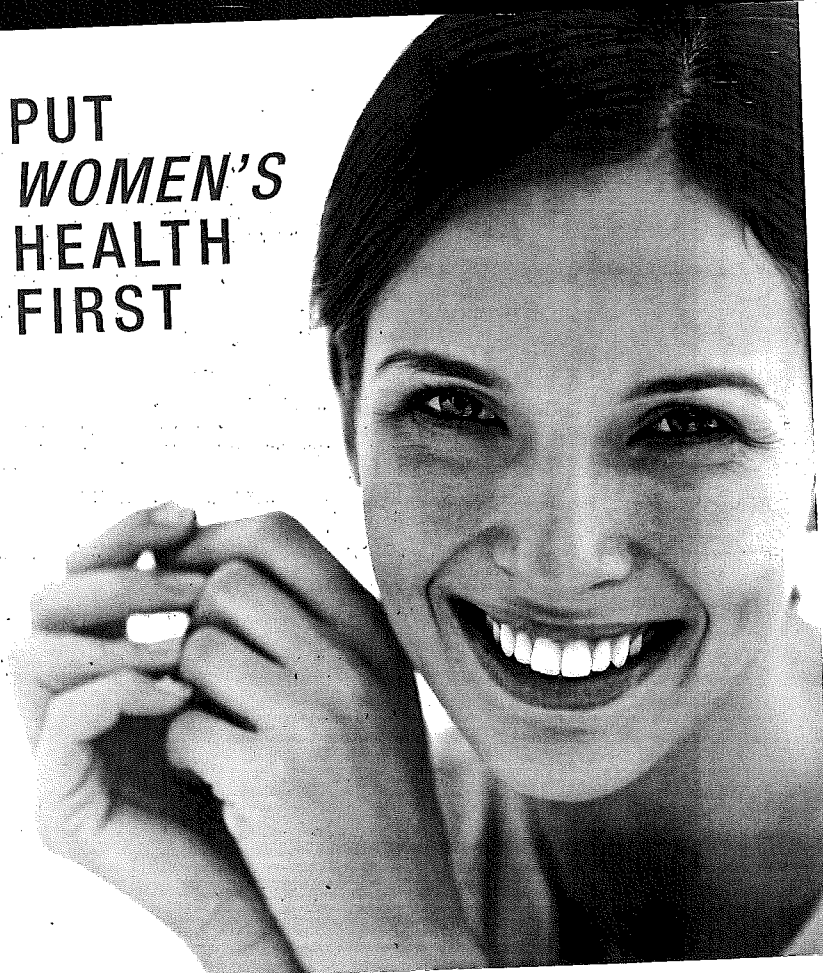
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Yes, I would like to receive updates from organizations supporting this comment:



Planned Parenthood Action Fund of North Carolina

PUT  
WOMEN'S  
HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Etta Barksdale

E-mail address etta.barksdale@gmail.com

ZIP Code 27520

Additional Comments:

I strongly support  
the guidelines created  
by HHS and want to  
see them enacted in  
law.

Yes, I would like to receive updates from organizations supporting this comment:

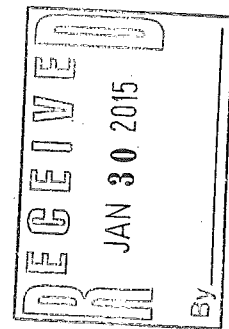
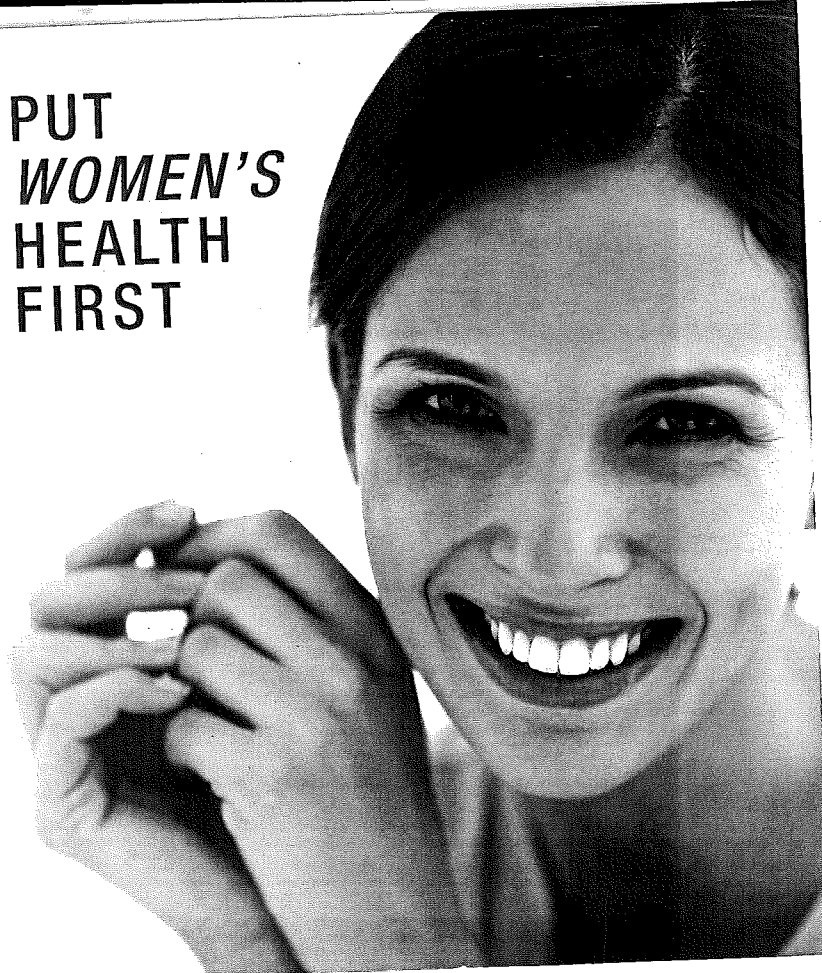


NARAL  
Pro-Choice North Carolina Foundation

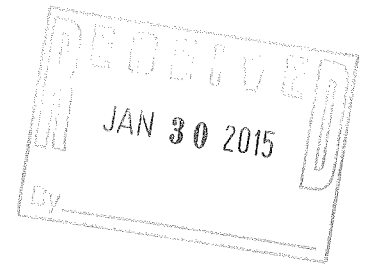


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FIRST NAME: Valerie LAST NAME: Barnes  
EMAIL: vnbarnes@gmail.com ZIP: 28801  
Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name JANE BARNETT-LAWRENCE

E-mail address JBARNETT1@UNCA.EDU

ZIP Code 27510

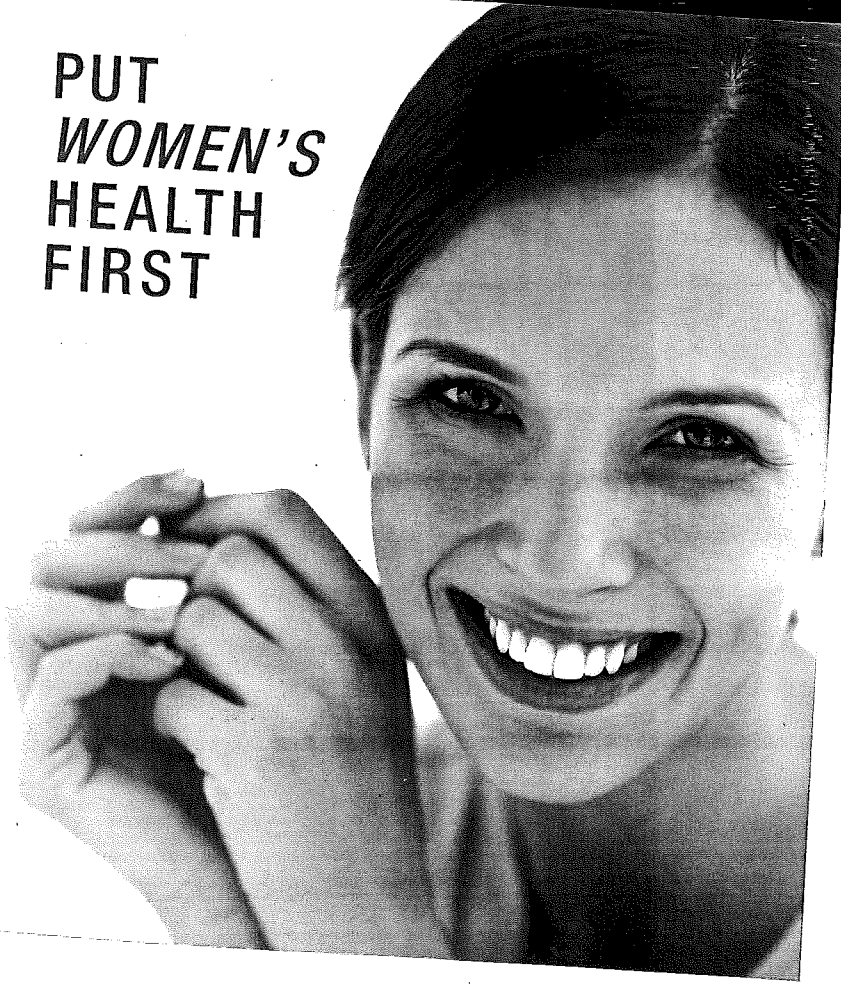
Additional Comments:  
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Name Carolyn Barrett  
E-mail address Carolyn@theBarretts.us  
ZIP Code 27617

Additional Comments:

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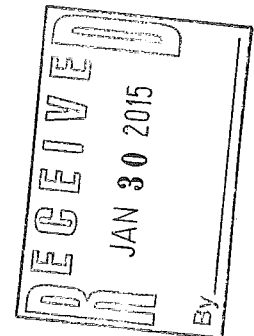
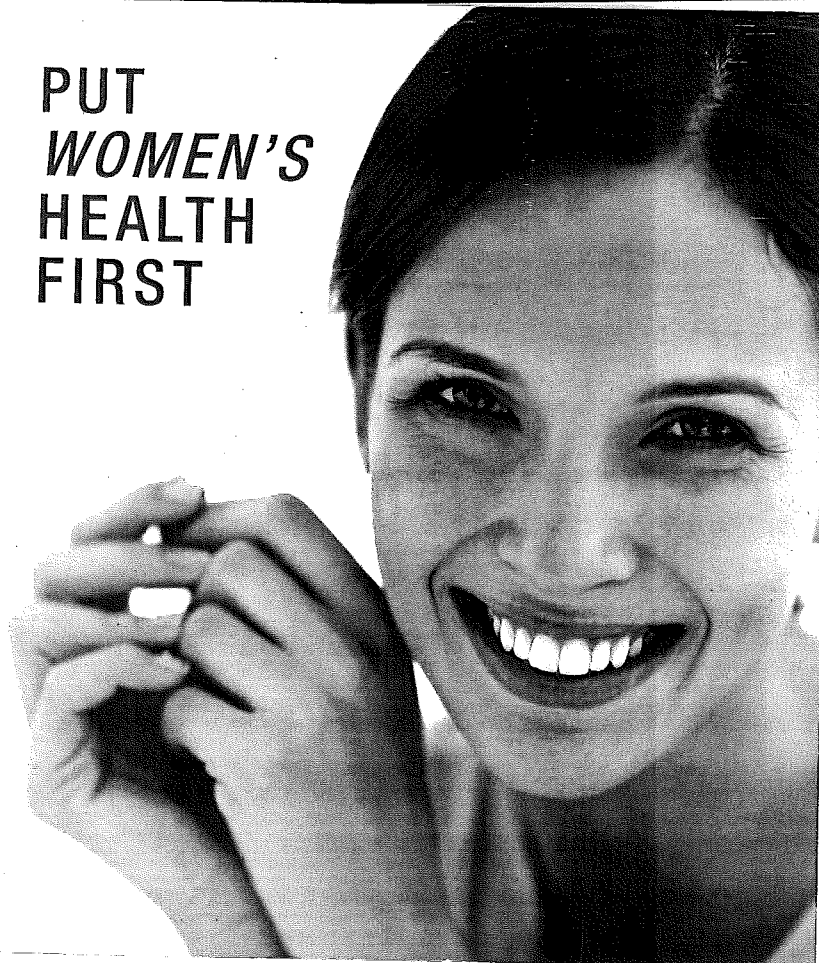
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Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



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Name Doug Barrick  
E-mail address dougbarrick7@gmail.com  
ZIP Code 27606

Additional Comments:

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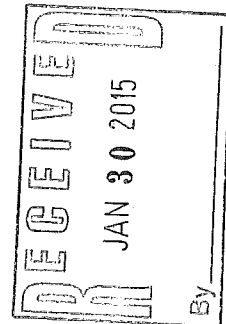
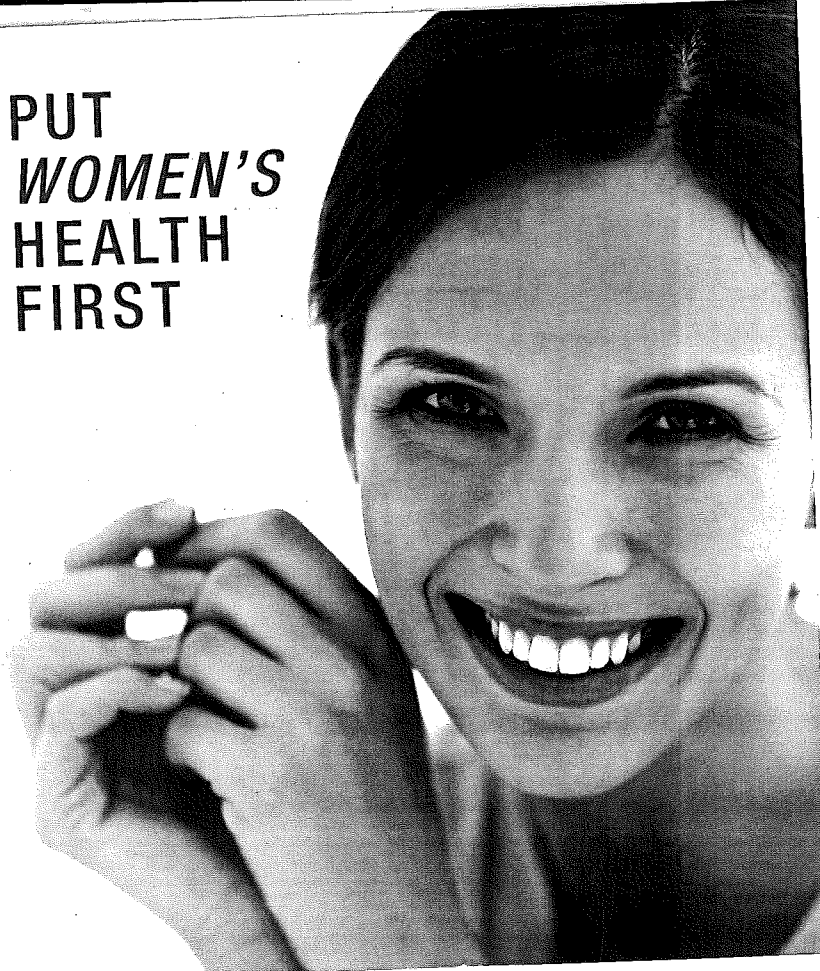


NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

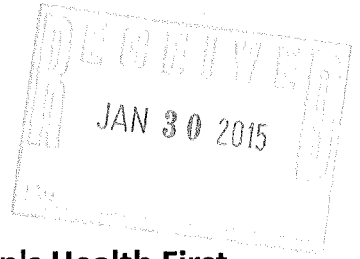
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FIRST NAME:

LAST NAME:

*Margaret*

*Barry*

EMAIL:

ZIP:

*Maggiebarry7@gmail.com*

Optional Comment field:

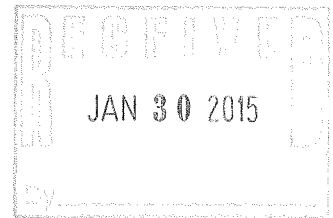
*easy access to abortion and birth control will reduce need for abortion services.*

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FIRST NAME:

LAST NAME:

Chrystal

Bartlett

EMAIL:

ZIP:

opt. out

27608

Optional Comment field:

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Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Elizabeth Bass

E-mail address N/A

ZIP Code 27511

Additional Comments:

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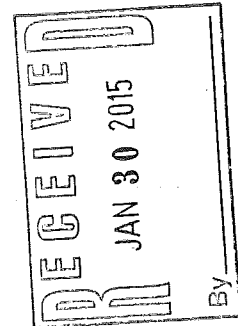
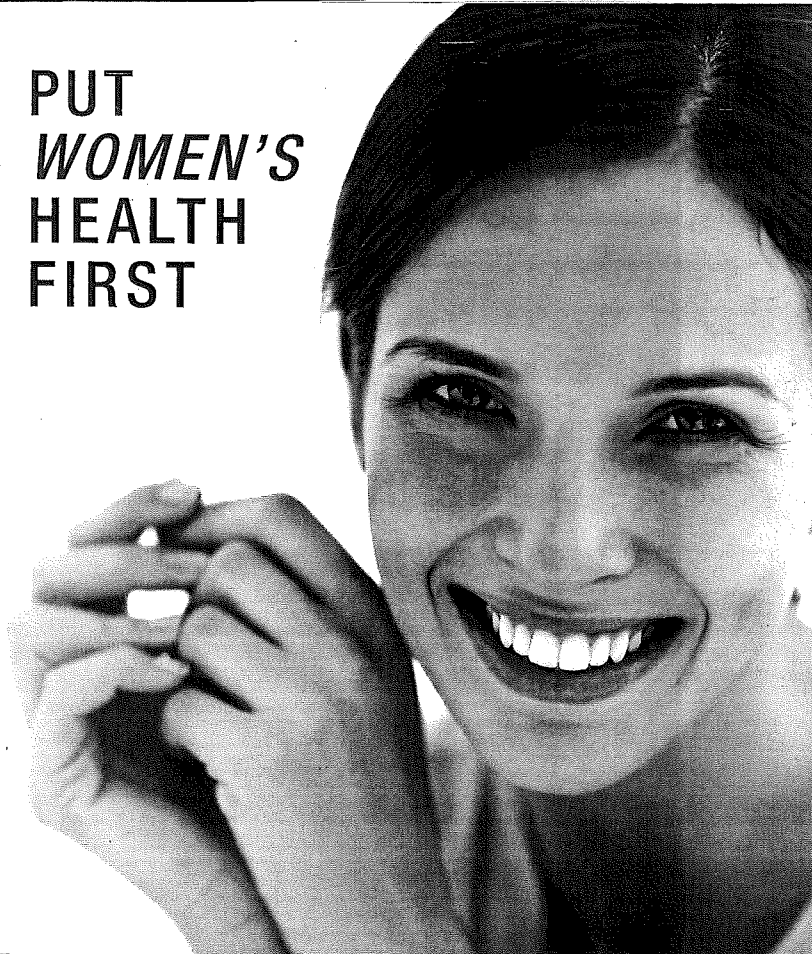
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 NARAL  
Pro-Choice North Carolina Foundation

 **Planned  
Parenthood**  
Act. No matter what.

Planned Parenthood Action Fund of North Carolina

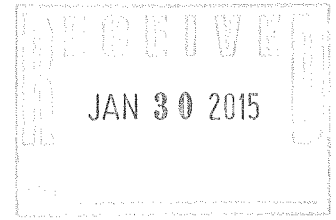
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Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
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FIRST NAME:

Khari

LAST NAME:

Battle

EMAIL:

Kharibattle@me.com

ZIP:

27514

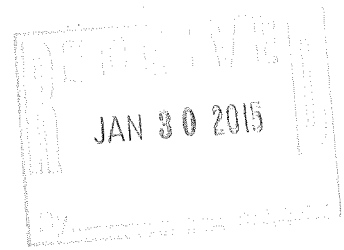
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FIRST NAME: *Kerry*

LAST NAME: *Beach*

EMAIL: *pbeach2@nc.rr.com*

ZIP: *27513*

*Optional Comment field:*

Yes, I would like to receive updates from organizations supporting this comment.

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Name Tracy Lynn Beard  
E-mail address naw2nurse@aol.com  
ZIP Code 27615

Additional Comments:

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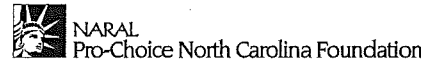
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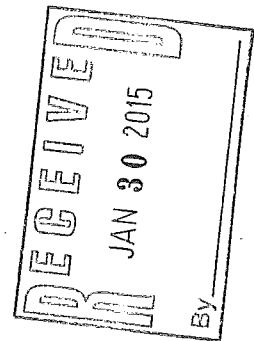
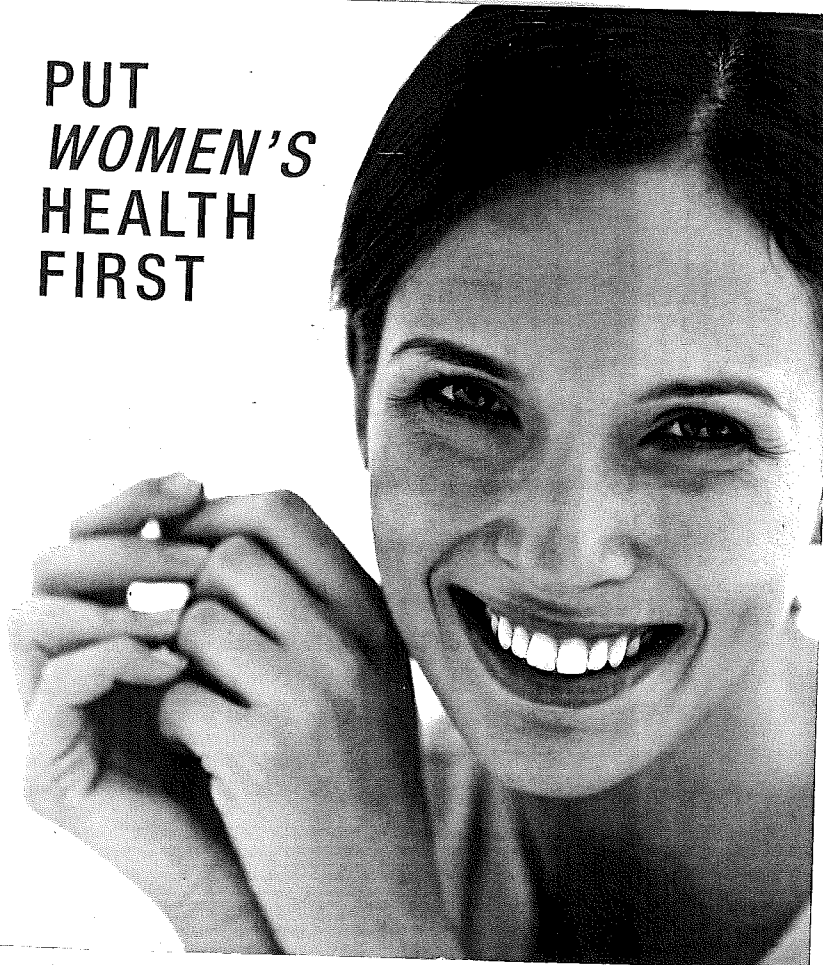
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Yes, I would like to receive updates from organizations supporting this comment:



Planned Parenthood Action Fund of North Carolina

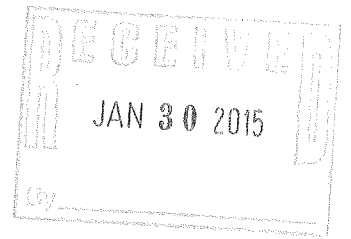
PUT  
WOMEN'S  
HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



Planned Parenthood Health Systems  
Action Fund, Inc.



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FIRST NAME:

Andrew BEARY

LAST NAME:

BEARY

EMAIL:

Andrew.BEARY@gmail.com

ZIP:

28211

Optional Comment field:

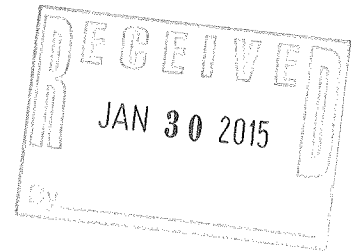
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Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC





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FIRST NAME:

Michele

LAST NAME:

Becher

EMAIL:

theFunkyFlea@gmail.com

ZIP:

28209

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Sarona Bedwan  
E-mail address SaronaBedwan@gmail.com  
ZIP Code 28277

Additional Comments:

Yes, I would like to receive updates from organizations supporting this comment:

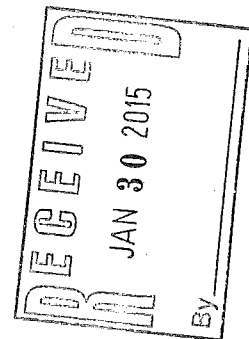
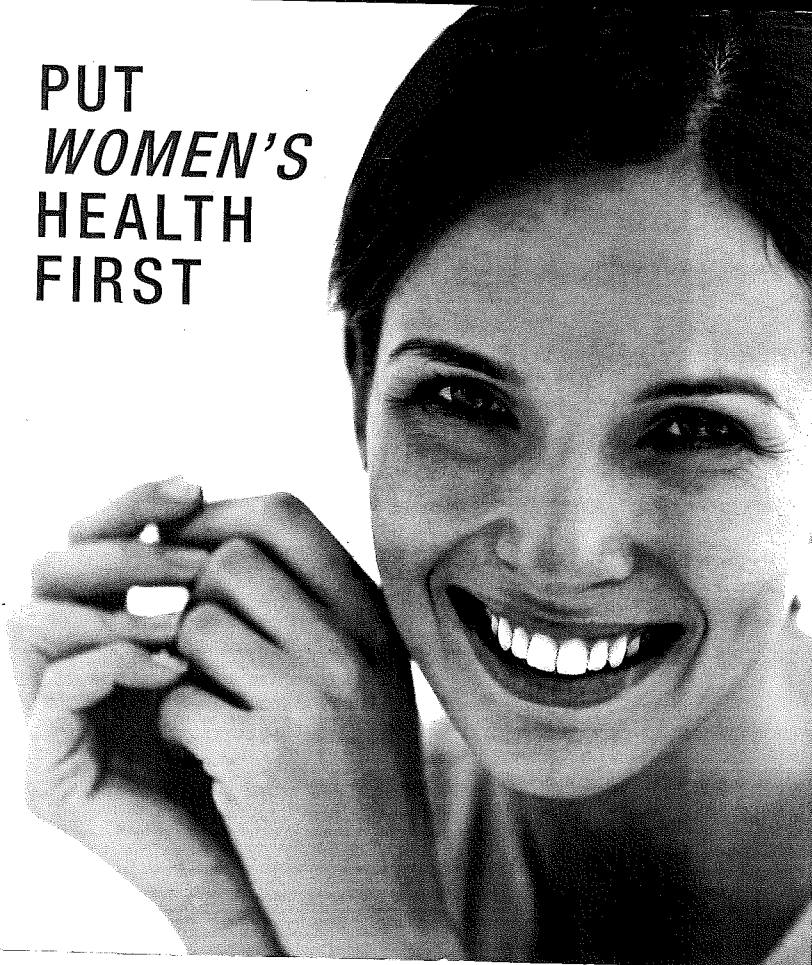


NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

## PUT WOMEN'S HEALTH FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

# TAKE ACTION!

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Name Maggie Behm

E-mail address benmv.maggie@gmail.com

ZIP Code 27015

Additional Comments:

It is not only important for the women, but for the baby abortion is safe and legal. Having a kid is extremely expensive and there's not always the economic stability to have a kid. Don't force a kid on someone if you aren't going to provide the means of raising it.

Yes, I would like to receive updates from organizations supporting this comment:

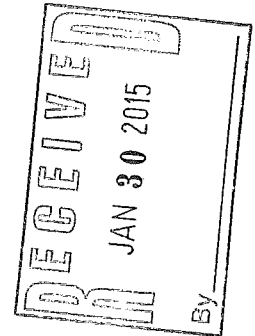
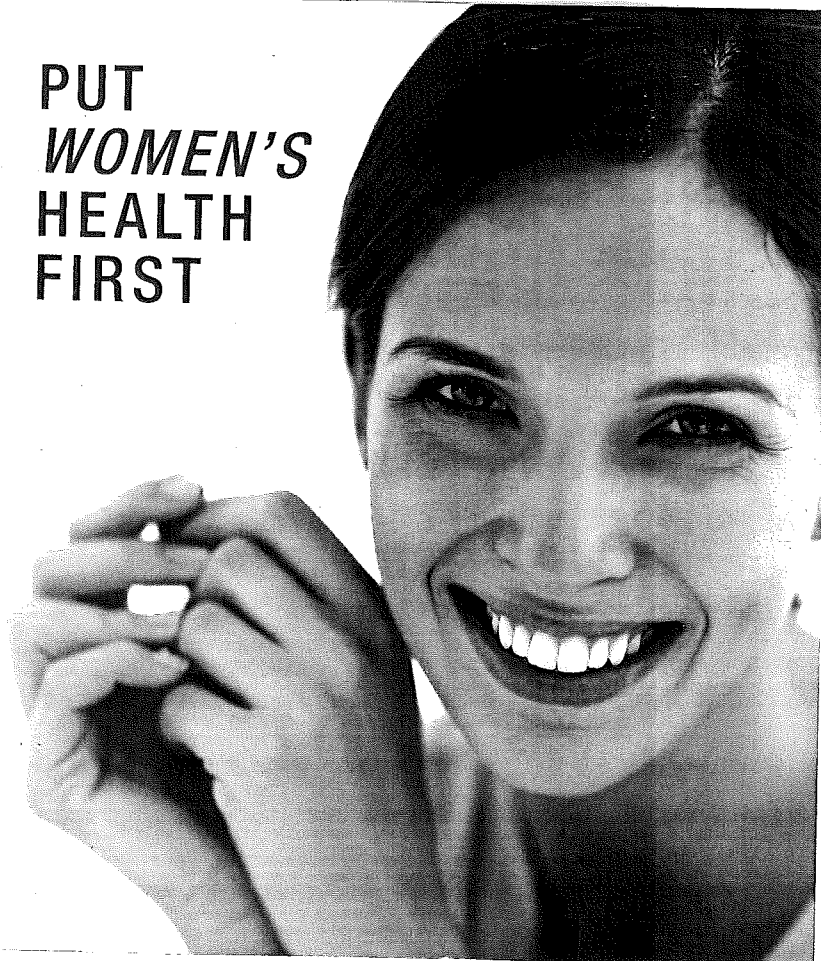


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Name Ellen Beidler, RN  
E-mail address ebeidler@usa.net  
ZIP Code 27609

Additional Comments:

As an oncology nurse, I see  
all too often women whose  
lives are shortened & who  
suffer unnecessarily due to  
poor access to health care.  
Consider the value of  
accessible, affordable services  
in women's health.

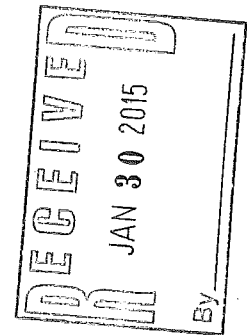
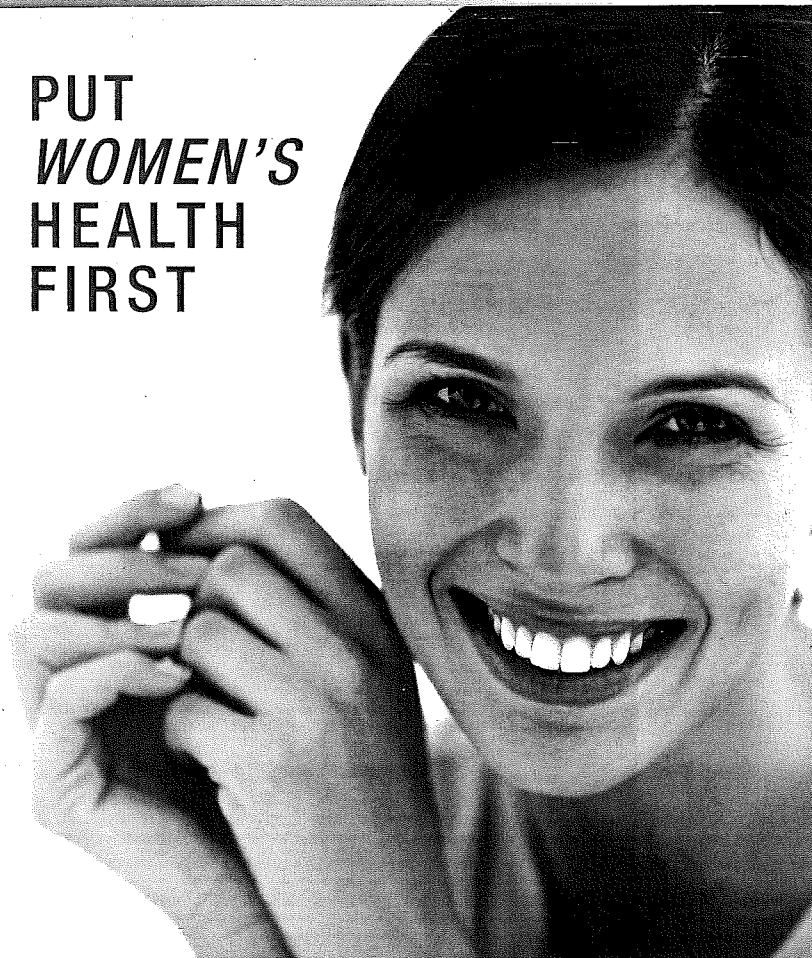
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 NARAL  
Pro-Choice North Carolina Foundation

 **Planned Parenthood**  
Act. No matter what.

Planned Parenthood Action Fund of North Carolina

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Name Lea Bekete

E-mail address \_\_\_\_\_

ZIP Code 28270

Additional Comments:

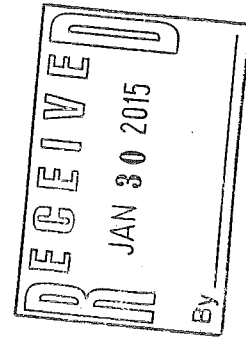
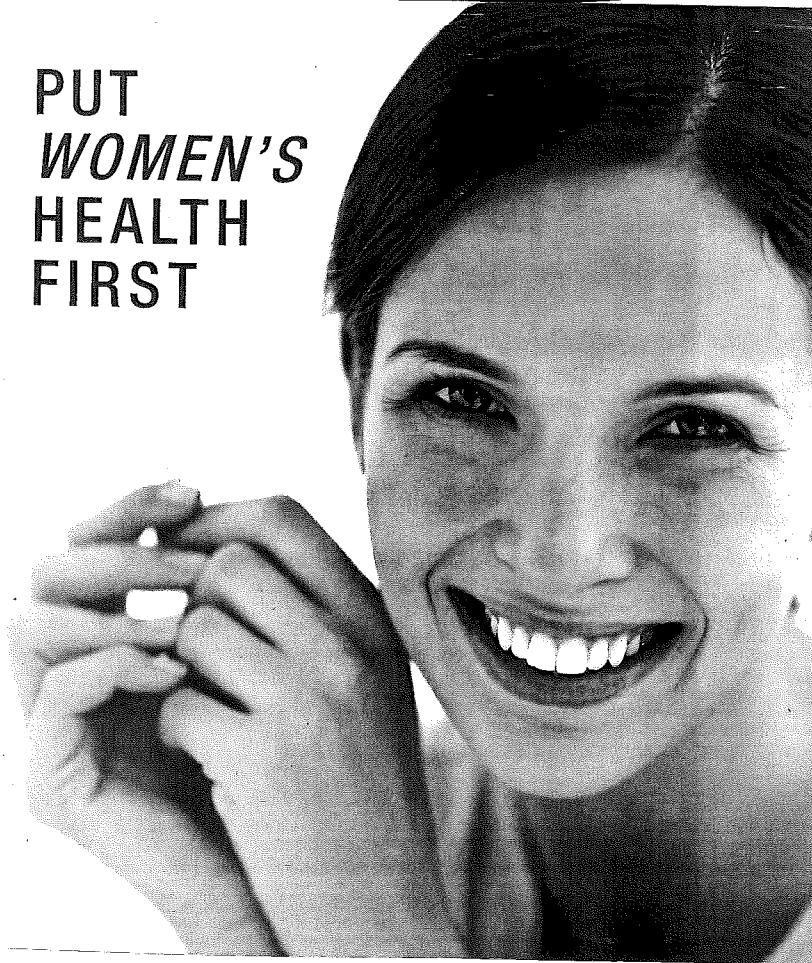
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Name Cameron Bello  
E-mail address cbello@uncg.edu  
ZIP Code 27265

Additional Comments:

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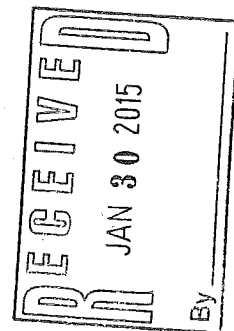
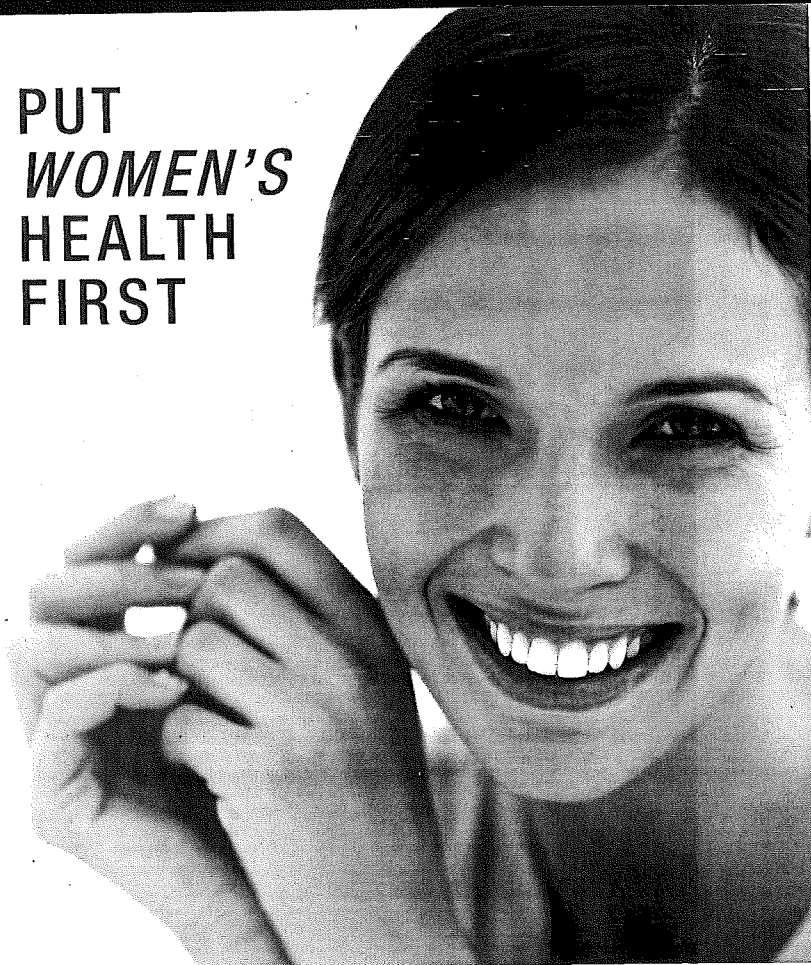
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Name Laura Benedict  
E-mail address benedicflaura1959@gmail.com  
ZIP Code 27701

Additional Comments:

Please!

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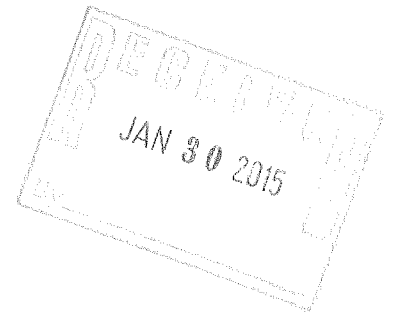
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Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund North Carolina



Planned Parenthood Health Systems  
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FIRST NAME:

LAST NAME:

Kate Bennet

EMAIL:

ZIP:

Kgbennet@hotmail.com 28773

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



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Name Trude Bennett  
E-mail address trude\_bennett@unc.edu  
ZIP Code 27707

Additional Comments:

Yes, I would like to receive updates from organizations supporting this comment:



NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

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Name Mikayla Burnett  
E-mail address ldelystree2014@gmail.com  
ZIP Code 28804

Additional Comments:

Yay!

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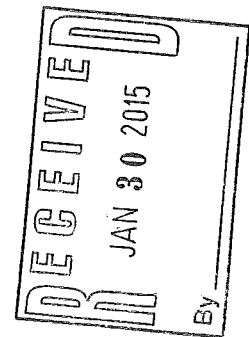
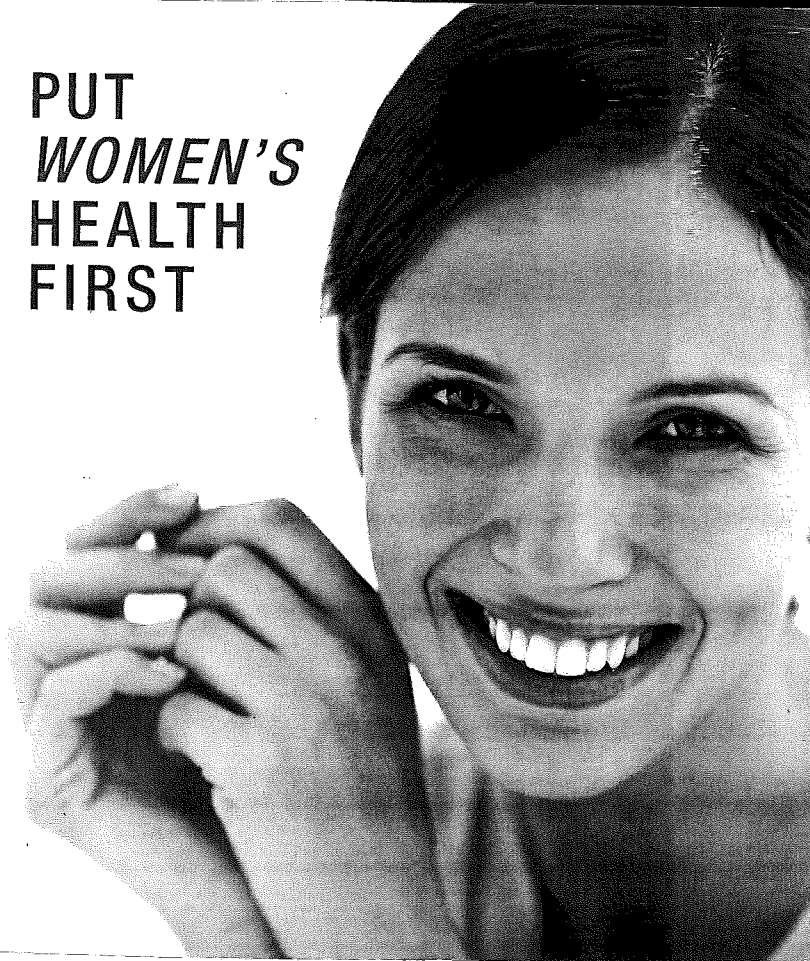
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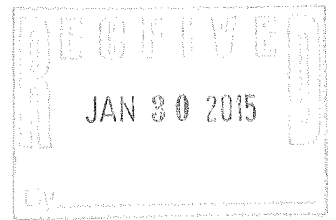
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FIRST NAME:

Katherine

LAST NAME:

Benson

EMAIL:

film\_crickeet@hotmail.com

ZIP:

27713

Optional Comment field:

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Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Zoe Bergmire-Sweat  
E-mail address zbergm@uncw.edu  
ZIP Code 28504

Additional Comments:

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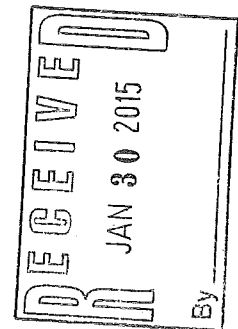
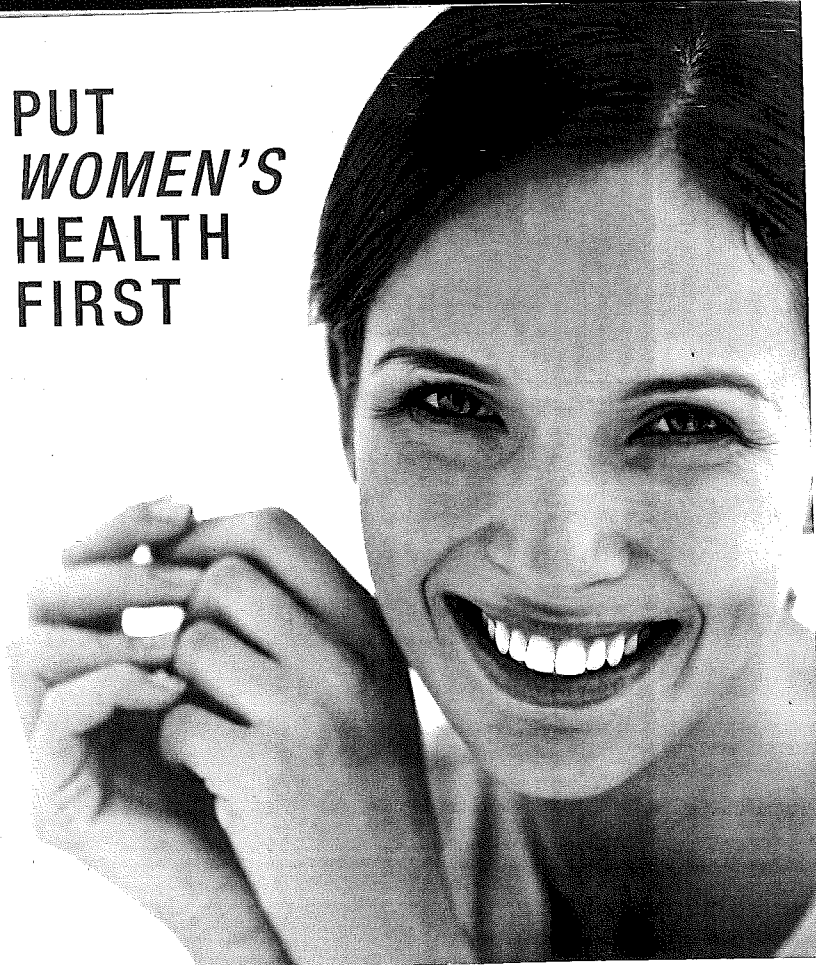


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Name Pat Berryman  
E-mail address patlberryman@gmail  
ZIP Code 27513

Additional Comments:

Please stand by  
women + science +  
evidence in any  
regulations.  
I say this as the  
mother of a daughter  
+ for all other young  
women.

Yes, I would like to receive updates from organizations supporting this comment:



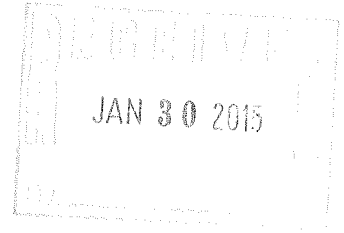
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FIRST NAME:

LAST NAME:

Ayinde

Best

EMAIL:

ZIP:

abest@unca.edu

28209

Optional Comment field:

FUCK EM

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Michelle BR  
E-mail address breulerprses@yahoo.com  
ZIP Code 28303

Additional Comments:

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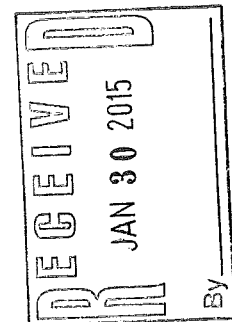
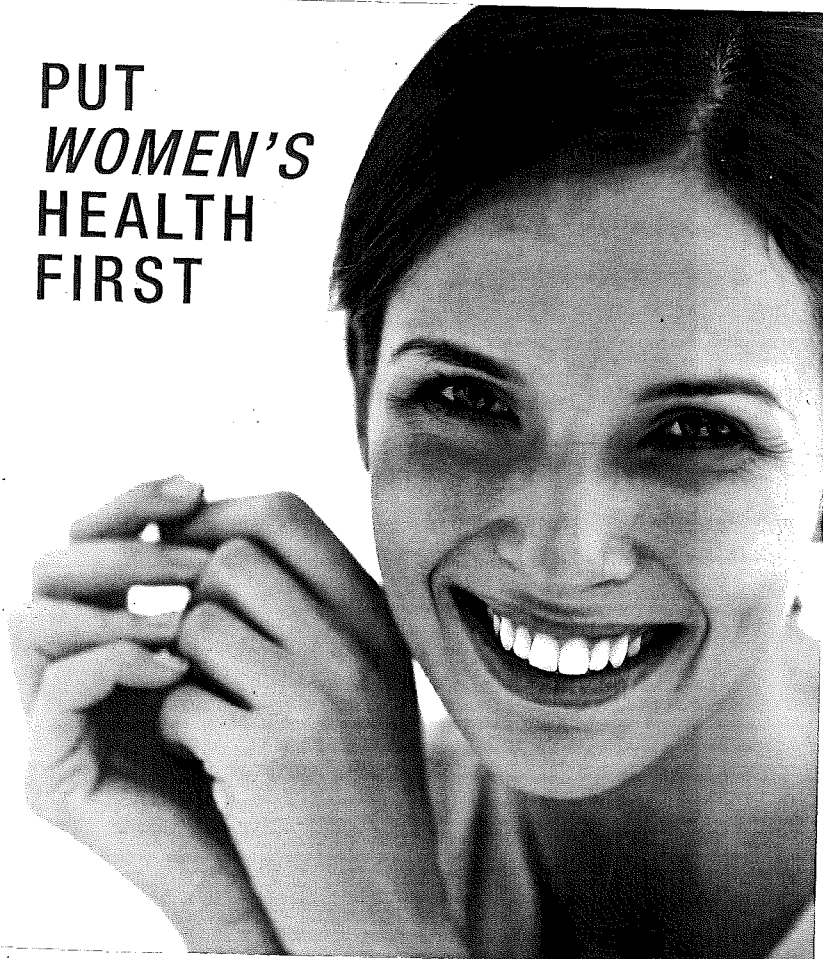
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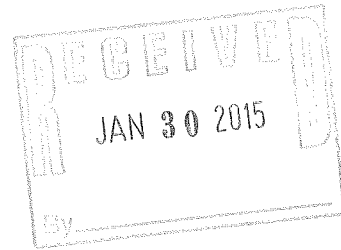
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FIRST NAME:

Casey

LAST NAME:

Bishopp

EMAIL:

caseybishopp@gmail.com

ZIP:

27523

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



# TAKE ACTION!

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Name Nadmi Angela Bissell


E-mail address Nadmianglabissell@gmail.com

ZIP Code 27608

Additional Comments:

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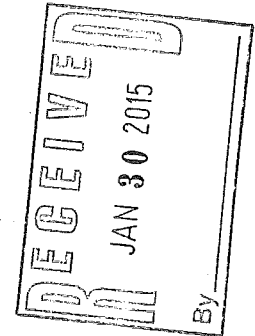
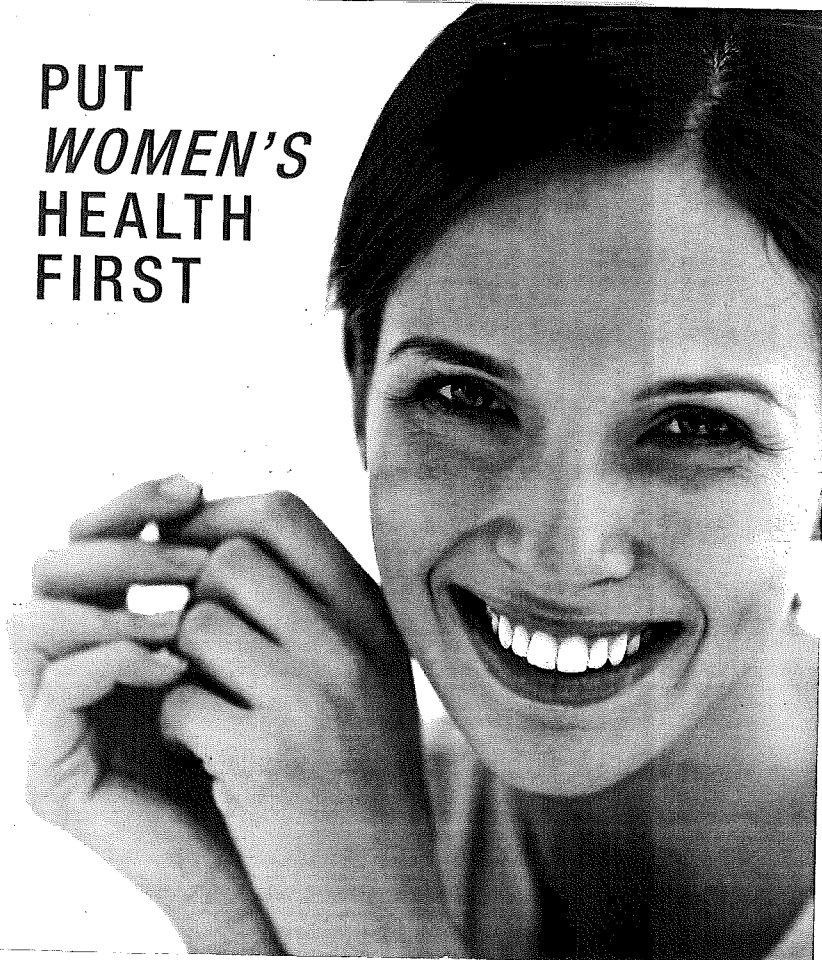
Yes, I would like to receive updates from organizations supporting this comment.

 NARAL  
Pro-Choice North Carolina Foundation

 **Planned  
Parenthood**  
Act. No matter what.

Planned Parenthood Action Fund of North Carolina

PUT  
WOMEN'S  
HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Rosmary Buzzell

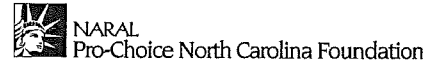
E-mail address no email!

ZIP Code 28467

Additional Comments:

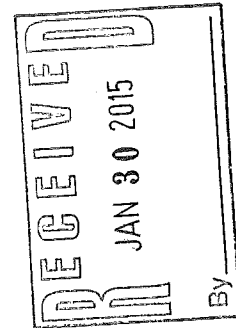
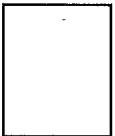
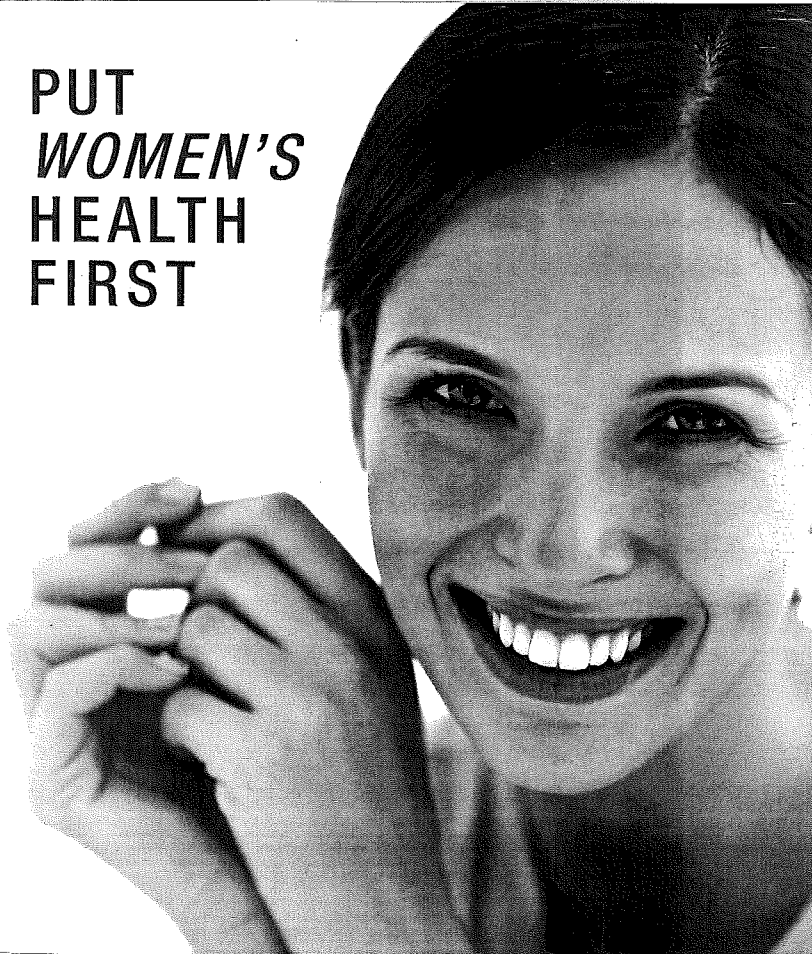
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Planned Parenthood Action Fund of North Carolina

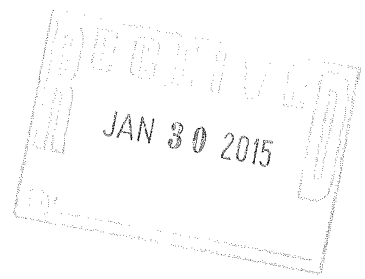
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*WOMEN'S*  
HEALTH  
FIRST



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2701 Mail Service Center  
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FIRST NAME:

Cindy

LAST NAME:

Blackburn

EMAIL:

cynthiablackburn@gmail.com

ZIP:

27517

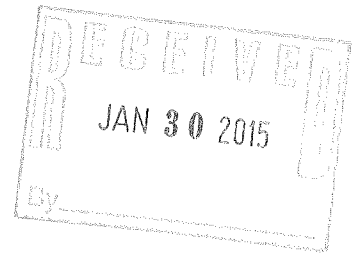
Optional Comment field:

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FIRST NAME:

Leigh

LAST NAME:

Blackwell

EMAIL:

ZIP:

27560

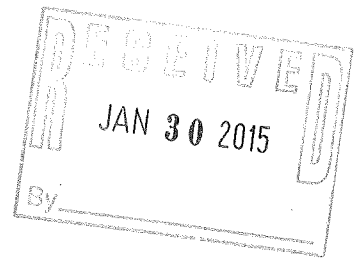
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FIRST NAME:

June

LAST NAME:

Blackwell

EMAIL:

~~June.Blackwell@plannedparenthood.org~~

ZIP:

28092

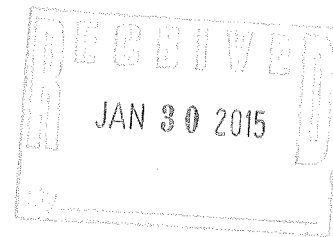
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FIRST NAME:

LAST NAME:

Jocelyn

Blanchard

EMAIL:

ZIP:

jblanchardx@gmail.com

28914

*Optional Comment field:*

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name MARISSA BLOOMFIELD  
E-mail address marissabloomfield9@gmail.com  
ZIP Code 27603

Additional Comments:

I support a woman's decision on ~~when~~ ~~where~~ what she wants to do with her body and politics need to be kept out of the equation.

Yes, I would like to receive updates from organizations supporting this comment:



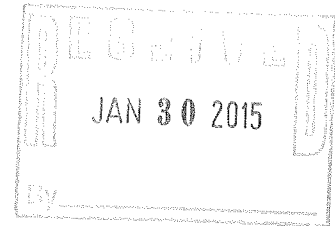
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FIRST NAME:

LAST NAME:

Laurie

Blum

EMAIL:

ZIP:

laurie.jblum@gmail.com

27157 27175

Optional Comment field:

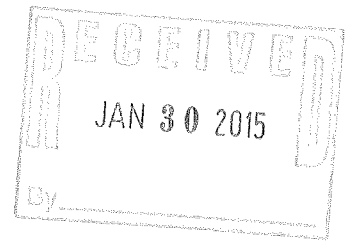
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FIRST NAME:

LAST NAME:

Hanna ~~Blunden~~

Blunden

EMAIL:

ZIP:

hmb82@cornell.edu 27514

Optional Comment field:

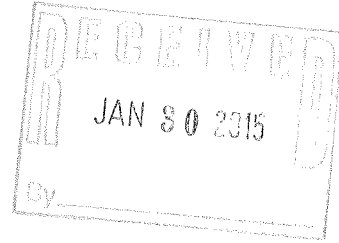
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FIRST NAME:

LAST NAME:

Laura

Boffa

EMAIL:

ZIP:

lauraboffunk@yahoo.com

28806

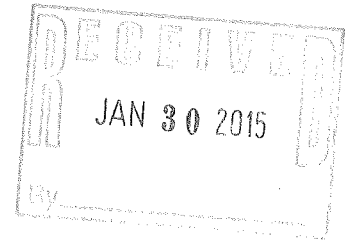
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FIRST NAME:

Phil

LAST NAME:

Bogle

EMAIL:

bocatgo@gmail.com

ZIP:

28215

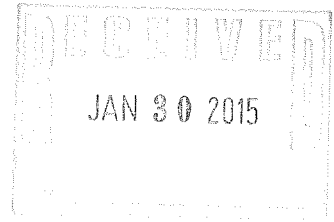
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FIRST NAME:

Clavisa

LAST NAME:

Bond

EMAIL:

minniesgirl@yahoo.com

ZIP:

27529

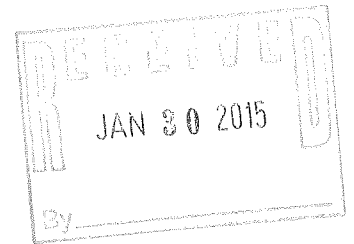
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FIRST NAME:

Megan

LAST NAME:

Bones

EMAIL:

mee ganzer@hotmail.com

ZIP:

28445

Optional Comment field:

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Name ELINOR BONIFANT

E-mail address elinor@bonifant@outlook.com

ZIP Code 27608

Additional Comments:

Hey there, people w/ vaginas  
are important, people with  
penises are important, intersex  
people are important.  
Everyone is important.  
Cool.

Yes, I would like to receive updates from organizations supporting this comment:

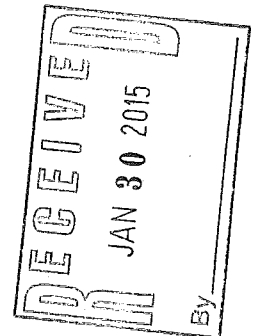
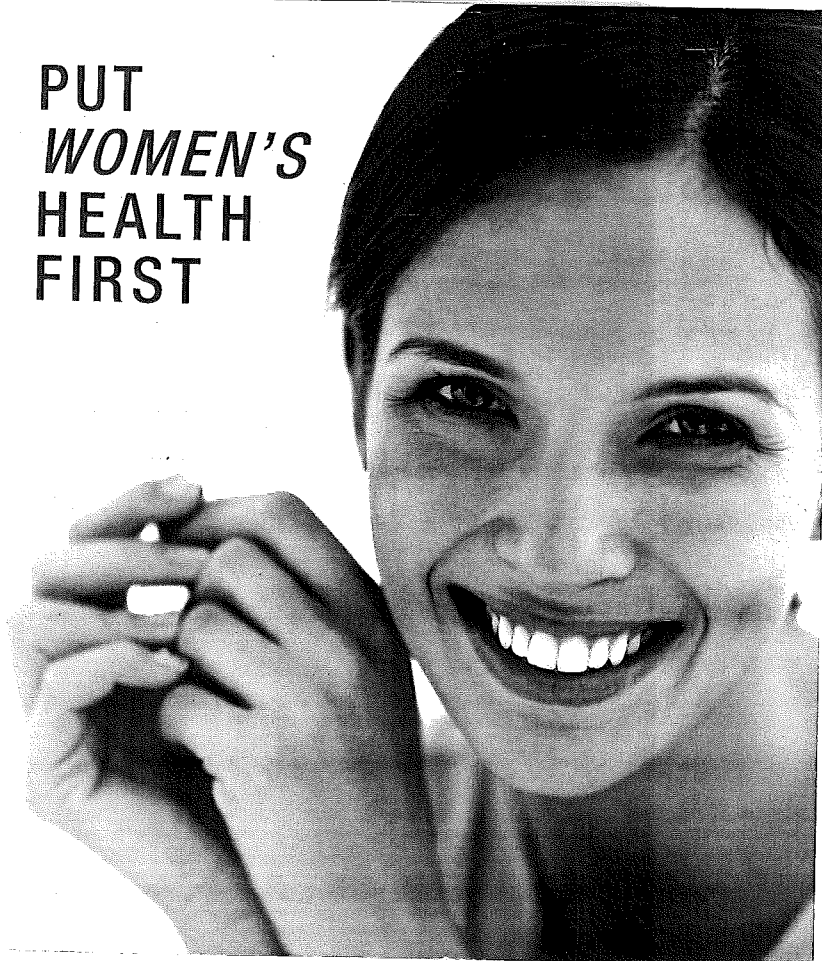


NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

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WOMEN'S  
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Name Dennis & Kathy Boas

E-mail address \_\_\_\_\_

ZIP Code 27607

Additional Comments:

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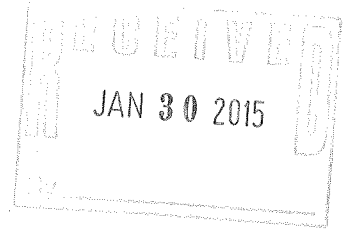
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FIRST NAME: Alexandra LAST NAME: Bot

EMAIL: bot222@hotmail.com ZIP: 27610

*Optional Comment field:*

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



# TAKE ACTION!

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Name Leah Boothill

E-mail address \_\_\_\_\_

ZIP Code 28078

Additional Comments:

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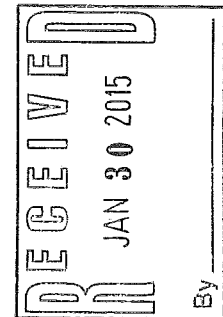
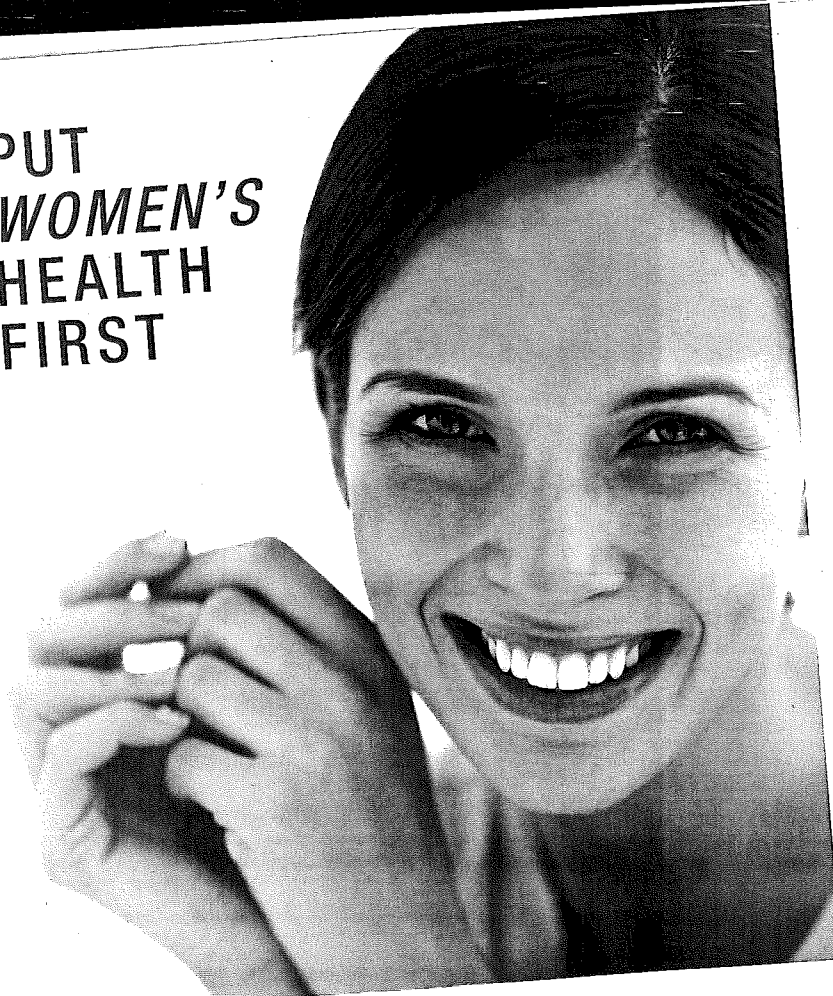
Yes, I would like to receive updates from organizations supporting this comment:

 NARAL  
Pro-Choice North Carolina Foundation

 **Planned Parenthood**  
Act. No matter what.

Planned Parenthood Action Fund of North Carolina

**PUT  
WOMEN'S  
HEALTH  
FIRST**



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

# TAKE ACTION!

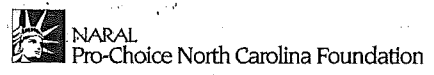
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Name Aimee Bovara  
E-mail address XOXOXaimee@aol.com  
ZIP Code 28778

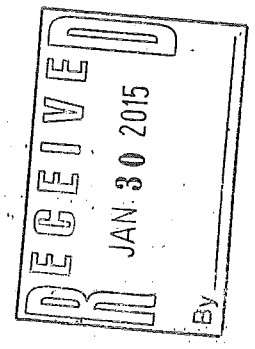
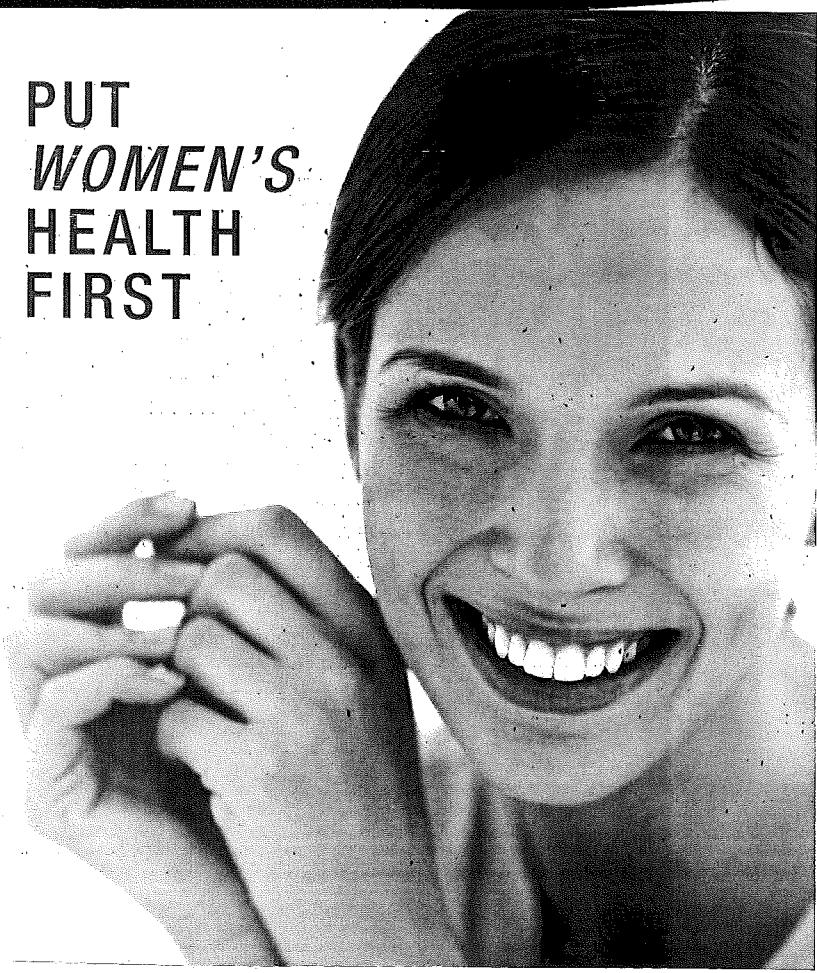
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Yes, I would like to receive updates from organizations supporting this comment:



Planned Parenthood Action Fund of North Carolina

## PUT WOMEN'S HEALTH FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Andrea Bowen  
E-mail address jabal25@att.net  
ZIP Code 27617

Additional Comments:

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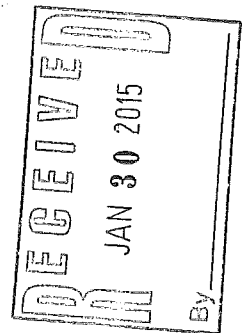
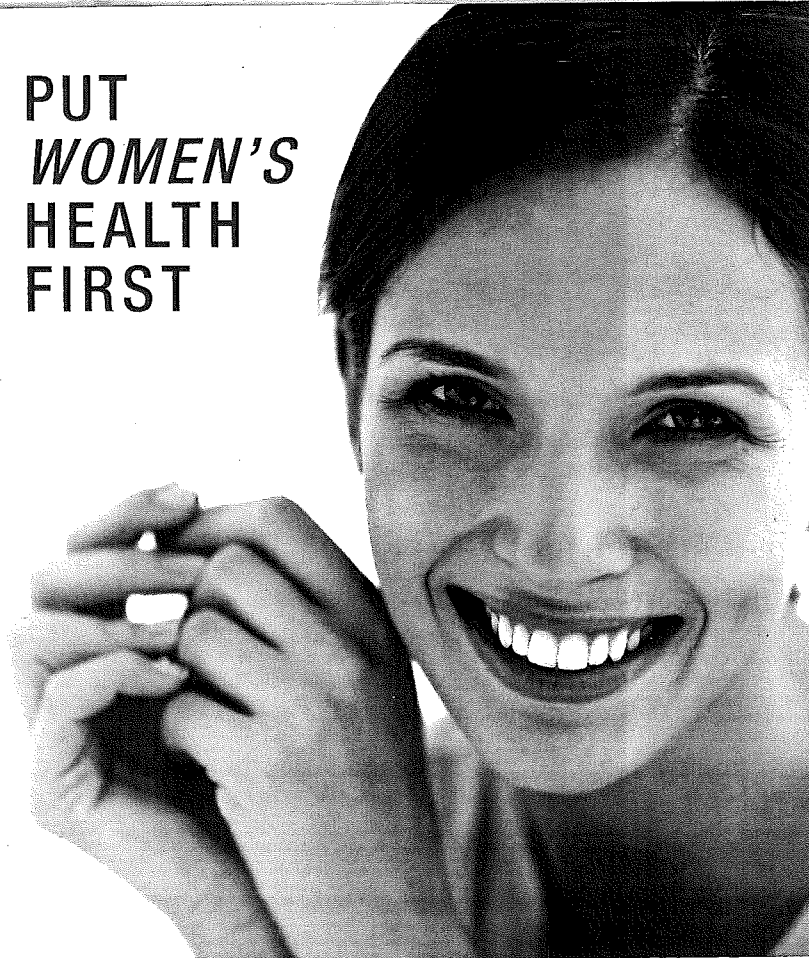
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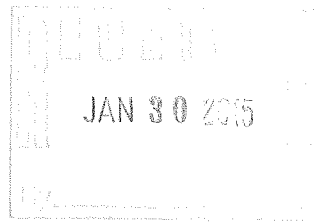
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Planned Parenthood Health Systems  
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FIRST NAME:

Christopher

LAST NAME:

Bowen

EMAIL:

pnchirs1@yahoo.com

ZIP:

28314

*Optional Comment field:*

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Leon Boyd  
E-mail address leon111@nc.rr.com  
ZIP Code 27529

Additional Comments:

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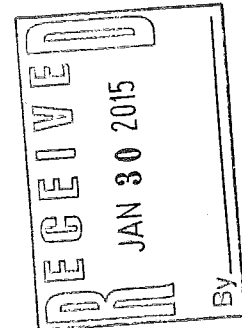
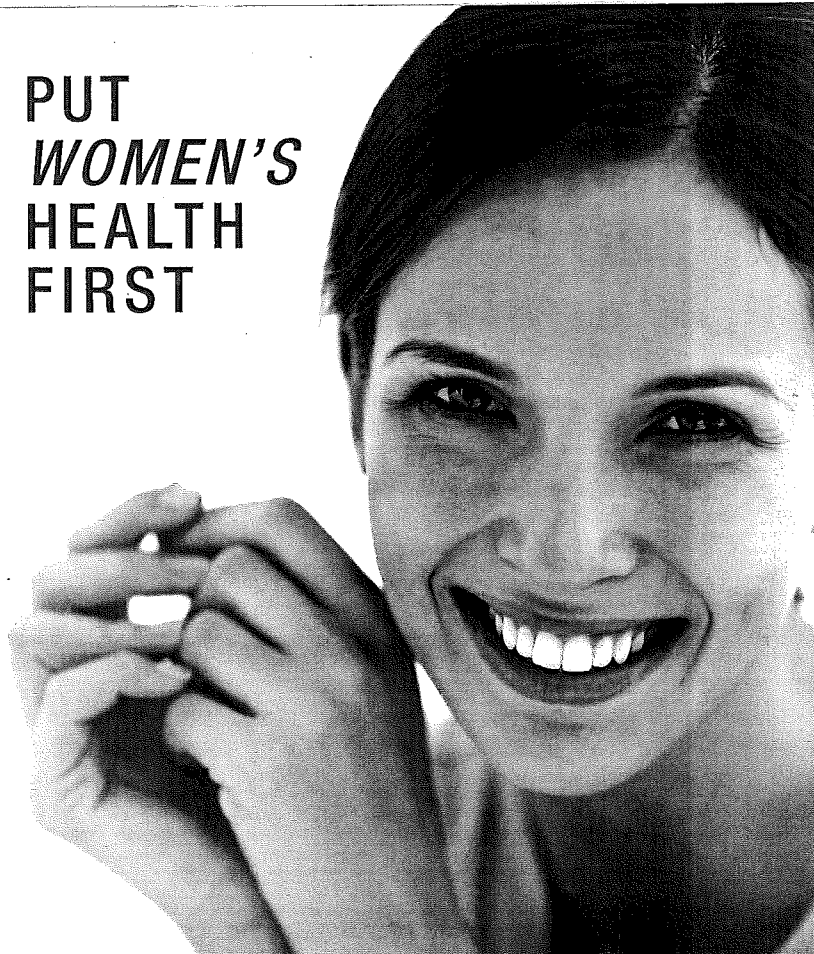
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Yes, I would like to receive updates from organizations supporting this comment:



Planned Parenthood Action Fund of North Carolina

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HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Leslie Boyd  
E-mail address leslie.boyd@gmail.com  
ZIP Code 28715

Additional Comments:

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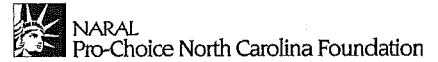
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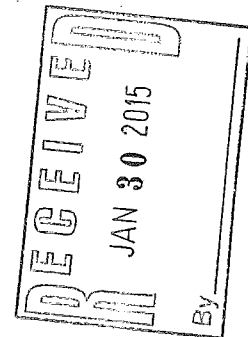
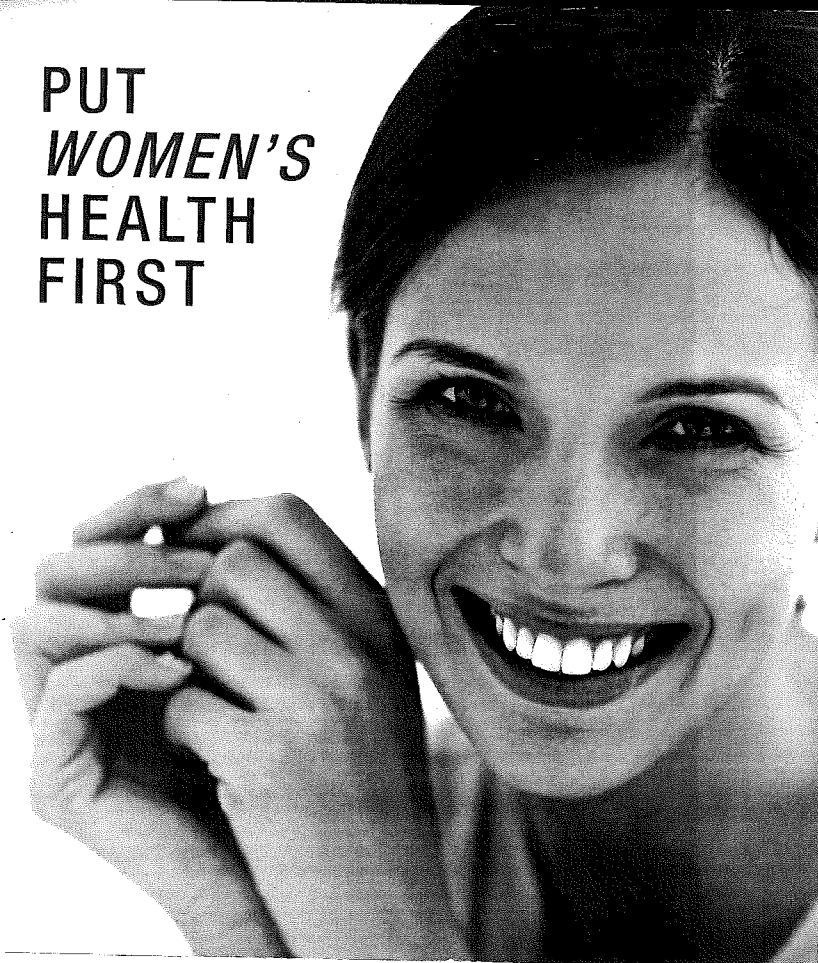
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Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



Planned Parenthood Health Systems  
Action Fund, Inc.

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FIRST NAME:

*Margaret*

LAST NAME:

*Boyer*

EMAIL:

*margpottluck@gmail.com*

ZIP:

*27572*

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Elizabeth Brady  
E-mail address ebrady@uncg.edu  
ZIP Code 28732

Additional Comments:

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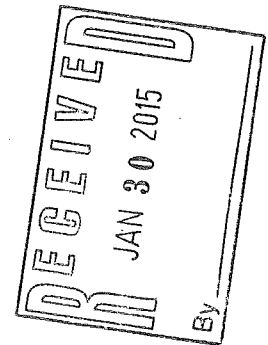
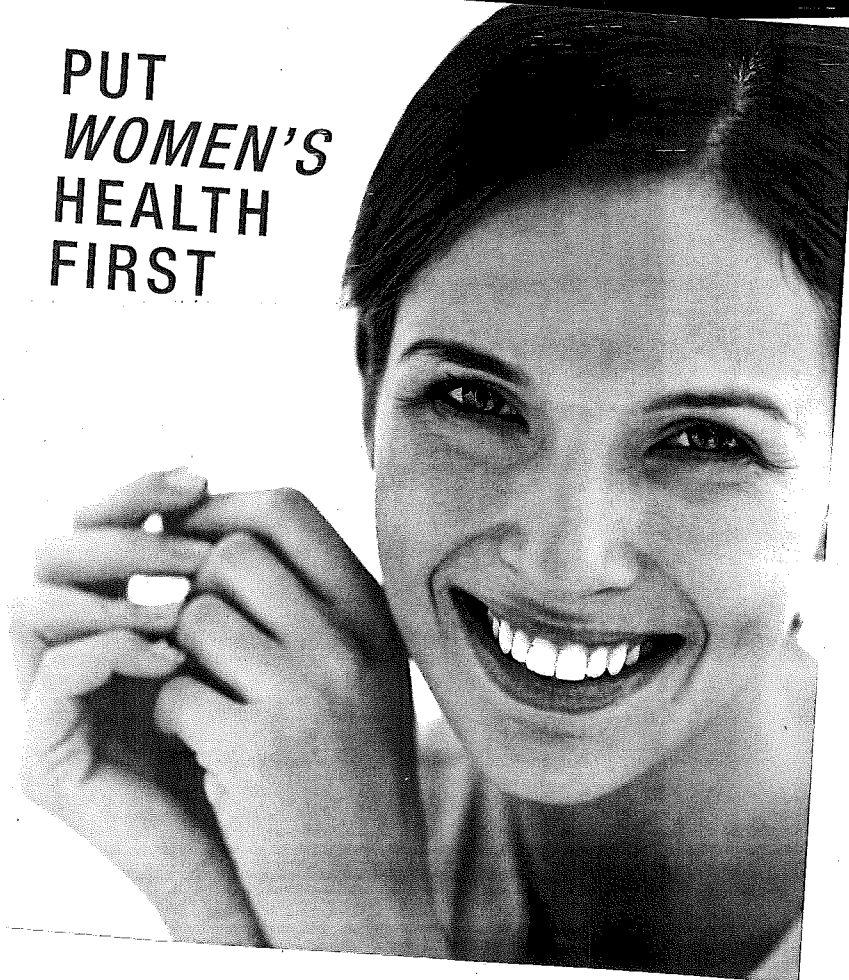
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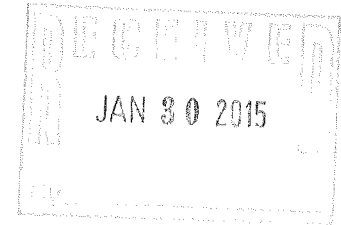


Nadine Pfeiffer  
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2701 Mail Service Center  
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FIRST NAME:

LAST NAME:

Kayla

Bragg

EMAIL:

ZIP:

kaylabragg04@gmail.com 28748

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

My name is Dalia Brahmi and I am a board certified family physician, who specialized in family planning. I work in Chapel Hill, North Carolina and care for women from all over the state. I thank you for this opportunity to offer comments about the proposed regulations.

I am here today because I care about women and I care about my patients. As a family physician, I am proud of the family planning services I am able to provide because it is important to me that my patients have the ability to make their own personal medical decisions, that they are able to decide if and when they are ready to parent a child, and that they are able to care for the families they already have. I am humbled and honored that in my job, I help women make responsible decisions that are best for their health and well-being every single day.

As a physician, patient safety is my top priority. Abortion is a very safe and very common medical procedure. One in three women will have an abortion in her lifetime, which means that all of us know many women who have chosen to have an abortion because that is what was best for her. We know these women and we love these women. Every woman is unique and every situation is different. We all wind up facing decisions about our health that we never expected to make - in these moments, I can help my patients the most.

I think of my patient Ashley\*. She and her husband are raising two children, a daughter in kindergarten and a son who is 9 months old. She was surprised to find out she was pregnant at his 9-month check up because she had been taking birth control pills. After discussing it with her family and consultation with me about her options, Ashley decided they were not able to support another child at this time and they chose medical abortion. I am thankful I was able to care for Ashley; she has plans to finish her nursing degree at Durham Tech in the New Year.

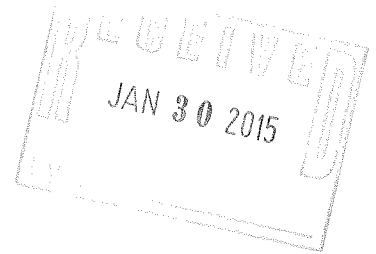
Doctors will always support regulations to improve patient safety and health outcomes that are based in evidence and best practices. I share Ashley's story today so that we all remember and keep in mind who these regulations will truly affect.

Thank you.

\*Ashley is a pseudonym



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Action Fund, Inc.



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FIRST NAME:

Mary

LAST NAME:

Brown

EMAIL:

mary.brown@uncp.edu

ZIP:

28352

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name JO ELLEN BRAY

E-mail address N/A

ZIP Code 28209

Additional Comments:

MANY YEARS AGO I ENLISTED THE SERVICES OF PLANNED PARENTHOOD FOR ALL THE REASONS LISTED IN THE PARAGRAPH, DUE TO THE LACK OF AFFORDABLE HEALTH INSURANCE. PP WAS A LIFE SAVER THEN, AND STILL IS TODAY, TO MANY, MANY WOMEN.

Yes, I would like to receive updates from organizations supporting this comment:



NARAL  
Pro-Choice North Carolina Foundation



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Name Susan Bray  
E-mail address Susan@jandsbray.com  
ZIP Code 27601

Additional Comments:

Additional reg will make  
- these centers harder for  
women to access - the very  
opposite of what the state  
should be doing! Don't  
politicize women's health

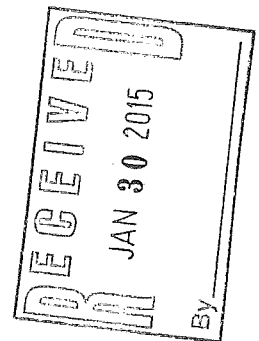
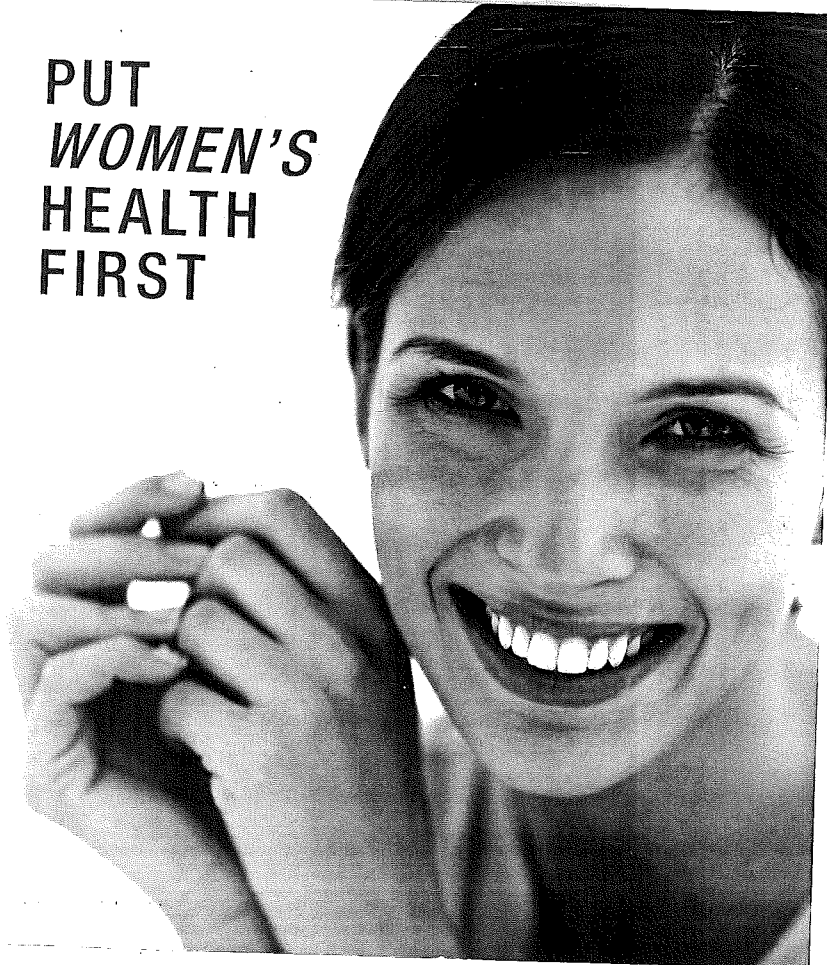
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Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Kim Breivogel  
E-mail address kbbreivogel@ghedi.com  
ZIP Code 27526

Additional Comments:

Women's health must  
be a priority!  
Thank you!

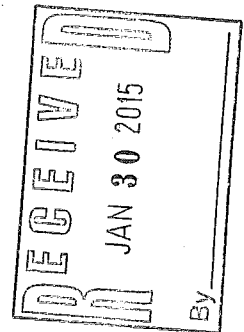
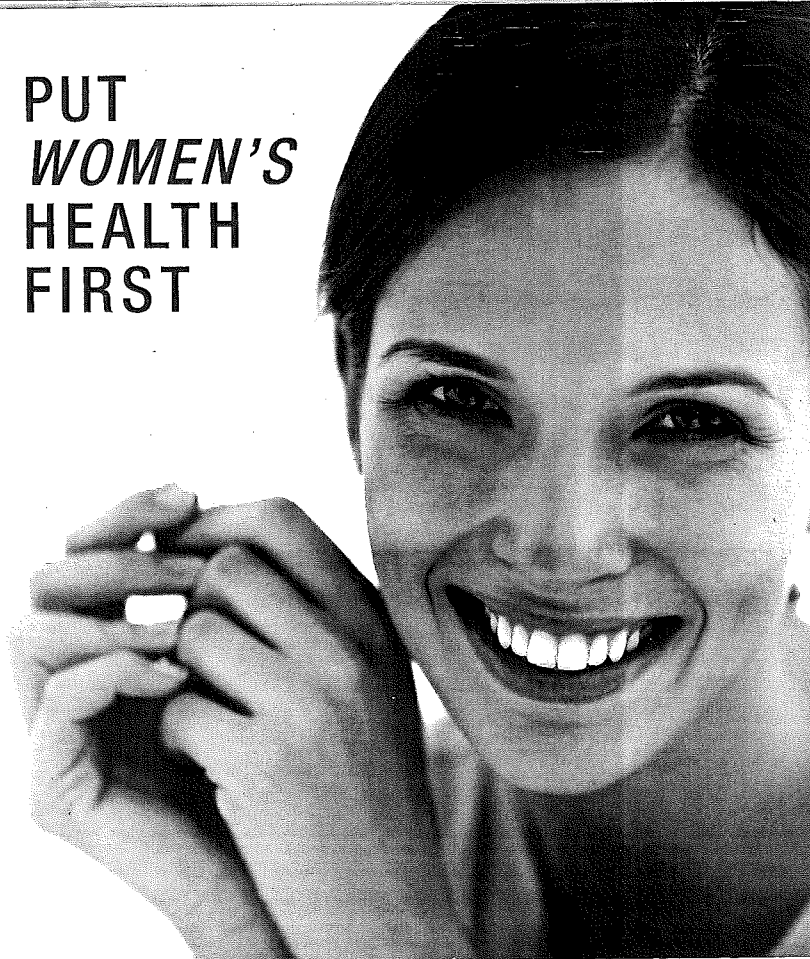
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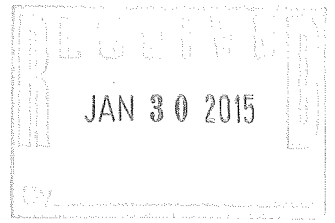
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FIRST NAME:

LAST NAME:

Kalia

Brenachantel Jackson

EMAIL:

ZIP:

jackson.kalia@gmail.com

28217

Optional Comment field:

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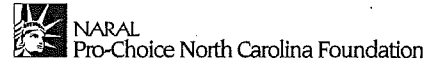
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Name Mary Bridgers Rand  
E-mail address mbridgers7@gmail.com  
ZIP Code 27546

Additional Comments:

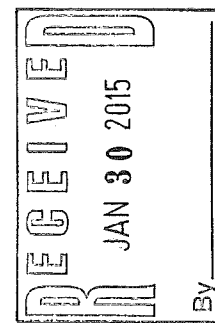
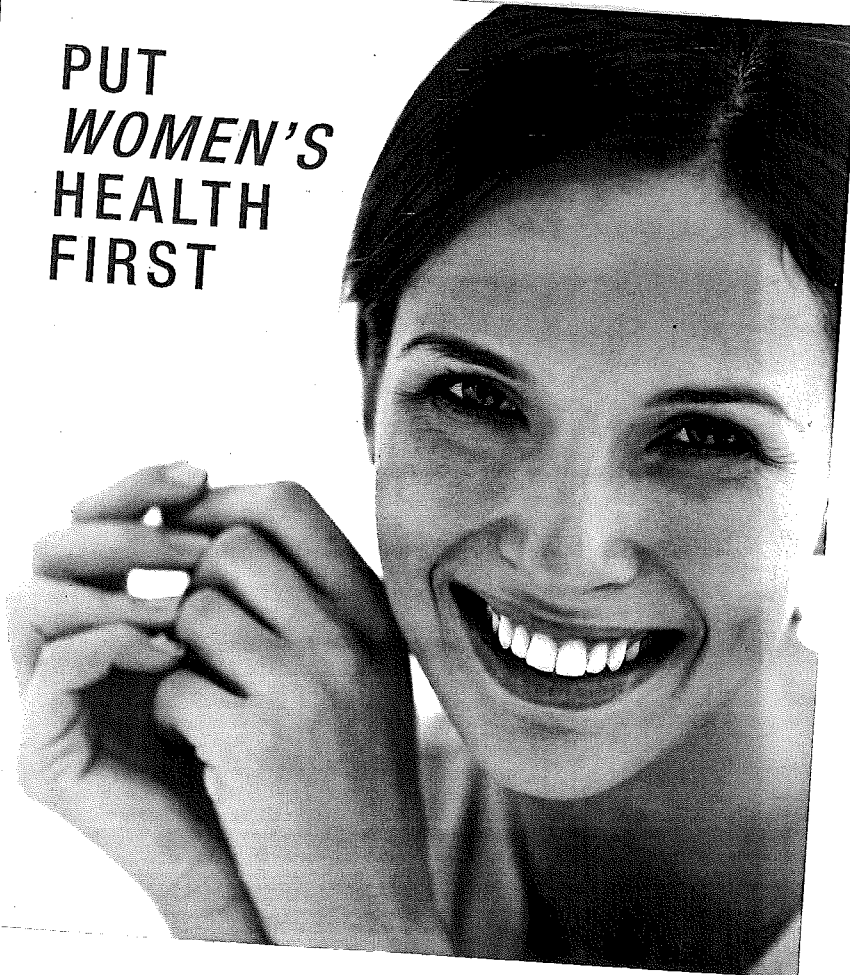
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Planned Parenthood Action Fund of North Carolina

**PUT  
WOMEN'S  
HEALTH  
FIRST**



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



# TAKE ACTION!

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Name Abbey Brincefield  
E-mail address abbey.brincefield@unc.edu  
ZIP Code 27503

Additional Comments:

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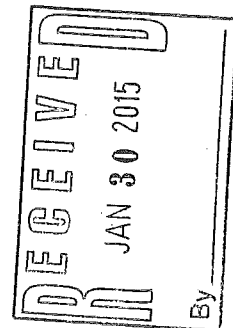
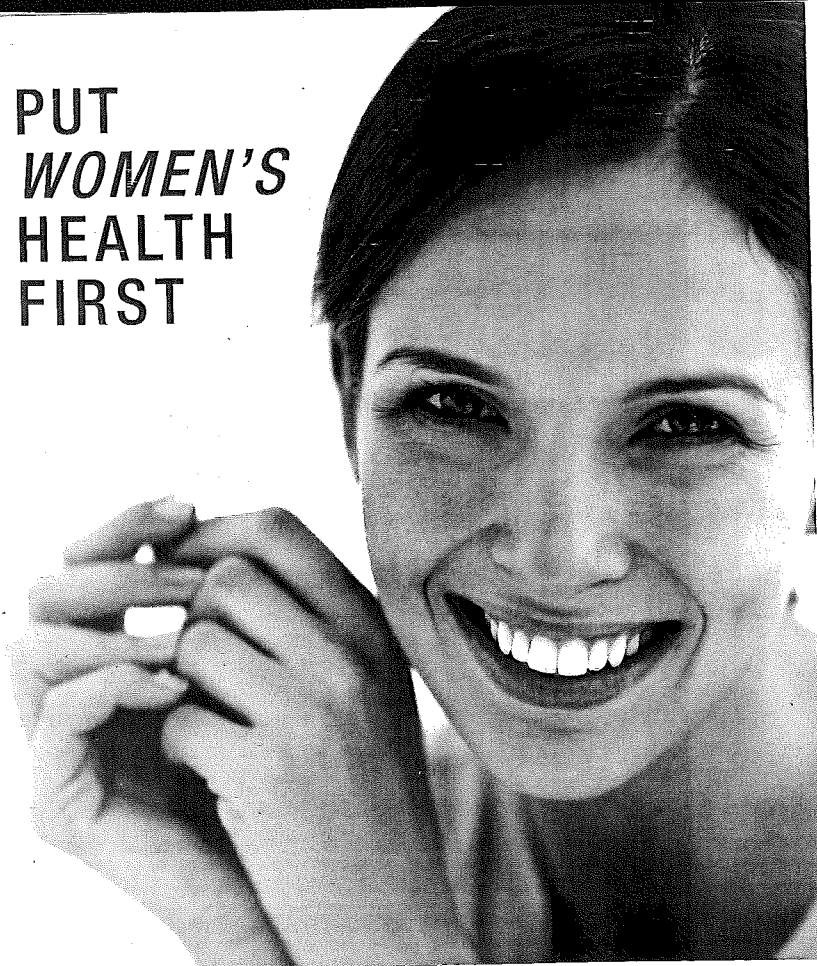
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Name Martha Brock  
E-mail address stogazernc3@gmail.com  
ZIP Code 27511

Additional Comments:

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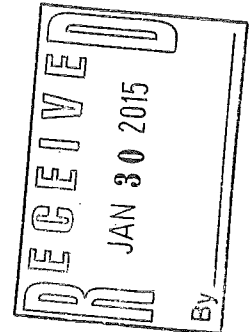
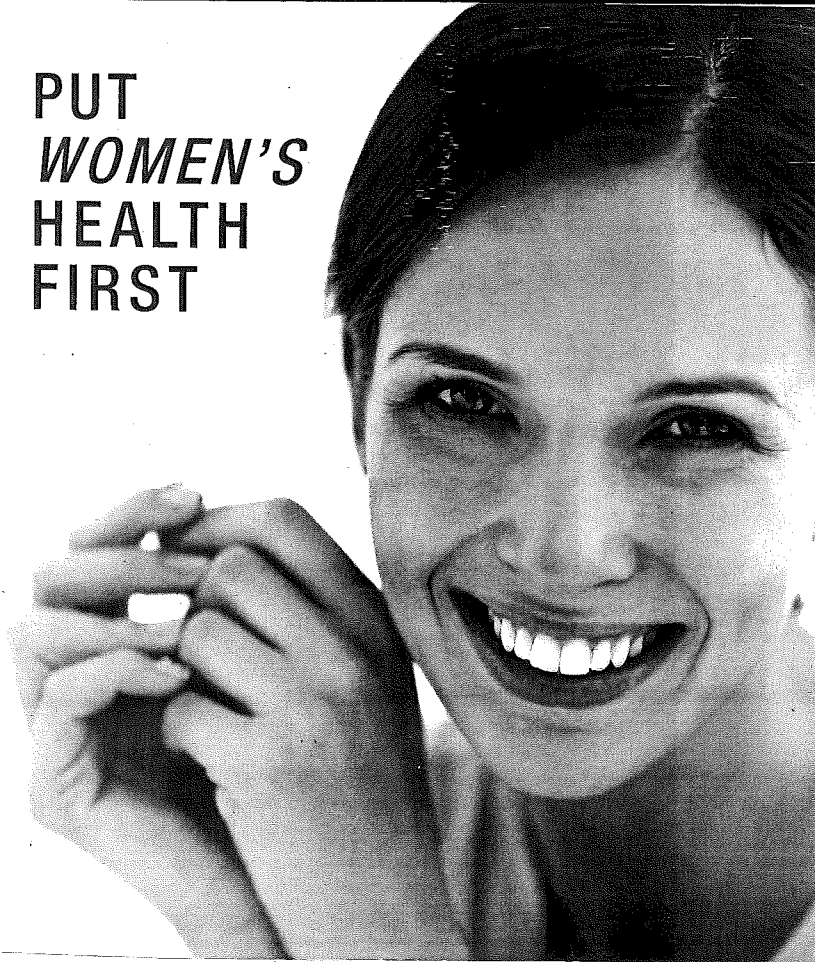


NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

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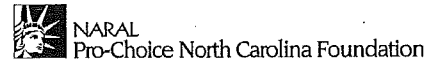
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Name Christopher Brook  
E-mail address christopher.a.brook@gmail.com  
ZIP Code 27517

Additional Comments:

Please put science + expert  
opinion over regressive  
politics by not adopting  
further unnecessary  
restrictions on abortion.

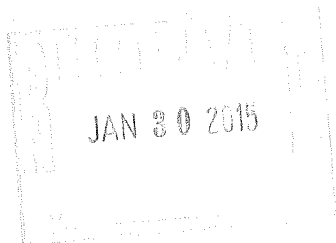
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Planned Parenthood Health Systems  
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FIRST NAME:

Michelle

LAST NAME:

Dionne Brooks

EMAIL:

mbrook45@uncc.edu

ZIP:

~~28102~~ 28262

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name ELLIOTT BROWN  
E-mail address TFOX(BROWN)@GMAIL.COM  
ZIP Code 28801

Additional Comments:

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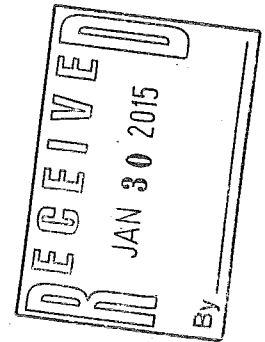
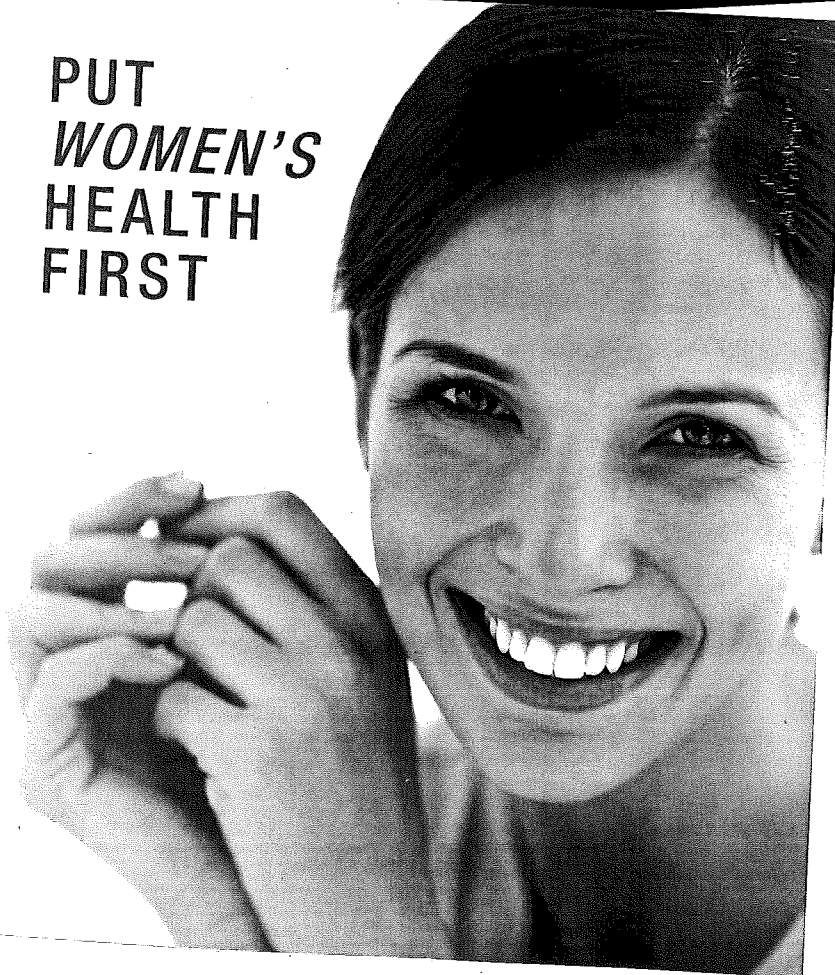


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Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



January 30, 2015

Nadine Pfeiffer  
2701 Mail Service Center  
Raleigh, NC 27699-2701  
DHSR.RulesCoordinator@dhhs.nc.gov

Re: Proposed Rules for Abortion Facilities

Dear Ms. Pfeiffer,

Thank you for the opportunity to submit written comments on the proposed amendments regarding the licensing of abortion facilities.<sup>1</sup>

The National Abortion Federation (NAF) is the professional association of abortion providers in North America. Our mission is to ensure safe, legal, and accessible abortion care, which promotes health and justice for women. Our member facilities care for half of the women who choose abortion in the United States and Canada each year, including women in North Carolina.

NAF is the leading organization offering accredited continuing medical education to health care professionals in all aspects of abortion care. NAF has also developed the most comprehensive medical textbook on abortion, *Management of Unintended and Abnormal Pregnancy: Comprehensive Abortion Care*, and created a range of multimedia educational materials for residency programs, medical educators, and practicing clinicians. In addition, NAF member facilities, including our members in North Carolina, adhere to our evidence-based *Clinical Policy Guidelines* (CPGs), which set the standards for quality abortion care in North America.<sup>2</sup> NAF's CPGs establish clinical guidelines, which are developed by consensus of medical professionals, based on rigorous review of the relevant medical literature and known patient outcomes.

Abortion care is one of the safest and most commonly provided medical procedures in the United States. Serious complications are extremely rare.<sup>3</sup> Credit for the outstanding

<sup>1</sup> Certifications of Clinics for Abortion, 29 N.C. Reg. 11 (Dec. 1, 2014) (to be codified at 10A NC ADMIN. CODE § 14E).

<sup>2</sup> NATIONAL ABORTION FEDERATION, *CLINICAL POLICY GUIDELINES* (2014), available at <http://prochoice.org/wp-content/uploads/2014NAFCPGs.pdf>.

<sup>3</sup> *Facts on Induced Abortion in the United States*, GUTTMACHER INSTITUTE, [http://www.guttmacher.org/pubs/fb\\_induced\\_abortion.html](http://www.guttmacher.org/pubs/fb_induced_abortion.html) (last updated Feb. 2014).

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Sharon A. Lewis, MA • Ruth L. Lockhart • Ann Schutt-Ainé, MD • Shelley Sella, MD • Elizabeth Talmont, MSN, NP  
Cristina Villarreal Velásquez • Lori Williams, MSN/APN • Beverly Winkoff, MD, MPH

safety record of abortion care is attributed to the specialized care given and received in outpatient facilities, which currently provide 95% of the abortion care in the United States.<sup>4</sup> In North Carolina, these facilities are already subject to extensive state regulations, above and beyond those that apply to other outpatient facilities offering other medical procedures with a comparable safety record. North Carolina abortion facilities are licensed under current regulations and have an excellent safety record.

Given the safety of abortion care and substantial existing regulations, NAF believes that increased regulation is unnecessary. However, we commend the Department of Health and Human Services (DHHS) on the process thus far, which has focused on medicine and science. DHHS also appropriately convened a workgroup of medical experts that could accurately advise DHHS as to the standard of care in abortion and on appropriate evidence-based medical regulations.

NAF offers the below comments based on our experience and expertise in developing evidence-based standards, drafting medically-appropriate regulations for abortion facilities with state health departments, and in the delivery of high-quality abortion care. We are confident that our suggestions will help ensure that the proposed regulations are consistent with evidence-based practices, which have proven most effective in ensuring patient safety.

#### **I. The proposed amendments do not contain a definition for “patient.”**

The definitions section of the proposed amendments provides several new definitions and changes to existing definitions.<sup>5</sup> The existing code and proposed amendments reference “patient” several times, for example within the sections on admission and discharge,<sup>6</sup> medical records,<sup>7</sup> and nursing services.<sup>8</sup> However, no definition of “patient” is provided. We would suggest a clarification of the definition of “patient” to mean a “patient receiving abortion care” or an amendment to the word “patient” throughout the code to say “abortion patient” in order to clarify that the code references abortion patients, and not patients receiving other services.

#### **II. The proposed amendments should contain additional protections for patient, facility, and staff confidentiality, safety, and privacy, and limit inspections hours.**

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<sup>4</sup> Rachel K. Jones and Kathryn Kooistra, GUTTMACHER INSTITUTE, *Abortion Incidence and Access to Services in the United States*, 2008, 43 PERSPECTIVES ON SEXUAL AND REPRODUCTIVE HEALTH, no. 1, at 42 (March 2011).

<sup>5</sup> See 10A NC ADMIN. CODE § 14E.0101.

<sup>6</sup> See *id.* at § 14E.0304.

<sup>7</sup> See *id.* at § 14E.0305.

<sup>8</sup> See *id.* at § 14E.0307.

The proposed amendments contain several requirements that could affect patient, facility, and staff confidentiality, safety, and privacy.<sup>9</sup> NAF's security program has expertise in protecting our members and their patients from security threats, and as such, we know that the DHHS authority to inspect patient and clinic records in the manner detailed throughout the regulations, and respond to information requests, could be problematic.

Abortion providers are often the targets of violence by anti-abortion extremists, who seek out information about facility ownership and policies in order to intimidate abortion providers and their patients. North Carolina women's health centers have been repeatedly targeted for violent crimes such as arson and bombings, as well as trespassing, regular picketing of the centers, and threatening phone calls and emails. Sensitive information about patients and staff, the ownership of the center, and the policies that the center develops for situations like fire or disaster preparedness must be protected from those who would threaten them or carry out violent acts. As written, the regulations do not adequately protect patient confidentiality and other sensitive information, especially when considering the unique security concerns of abortion providers.

At a minimum, the proposed amendments should be amended to allow for facility staff to redact protected names and other confidential information before review by DHHS or consideration for release under a public records request. Likewise, inspections should be required to be conducted only during the facility's regular business hours, rather than mandating "immediate" access.<sup>10</sup>

### **III. The proposed amendments on medical record retention should be clarified.**

The proposed amendments require a ten year retention of medical records, in place of the previous twenty year retention requirement.<sup>11</sup> We do not dispute this change, but rather seek clarification as to whether the ten year retention requirement – or the twenty year retention requirement – applies to medical records that contain a discharge date preceding the implementation of the proposed amendments.

### **IV. The quality assurance section of the proposed amendments should reflect the reality of limited abortion providers in North Carolina.**

The quality assurance section of the proposed amendments requires the governing authority to establish a quality assurance program, which includes "the establishment of a committee that shall evaluate compliance with clinic procedures and policies."<sup>12</sup> The

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<sup>9</sup> See *id.* at § 14E.0111(f) (providing that "[t]he clinic shall allow the Division to have immediate access to its premises and the records necessary to conduct an inspection and determine compliance"). See generally *id.* at § 14E.0111.

<sup>10</sup> See *id.* at § 14E.0111(f).

<sup>11</sup> See *id.* at § 14E.0305(f).

<sup>12</sup> See *id.* at § 14E.0308(a).



proposed amendments further provide that “[t]he committee shall consist of at least one physician who is not an owner.”<sup>13</sup> While we do not dispute the addition of a quality assurance program, we do disagree as to the need for the committee to include a non-owner physician. This medically-unnecessary requirement may prove difficult for smaller facilities that employ only physicians who are also owners. While theoretically the facility could seek out another physician with expertise in abortion care to serve on the committee, this could be very difficult – or impossible – to accomplish. A shortage of abortion providers exists both in North Carolina and in the United States. Given the difficult climate for abortion providers and the limited return on the investment of time and energy for the additional physician, finding this additional physician for the committee could be problematic. We suggest modifying the amendments to allow any type of physician, owner or non-owner, to serve on the quality assurance committee.

**V. The proposed amendments’ emergency back-up services requirements should not be expanded.**

The proposed amendments require that an abortion facility have a written transfer agreement in case of the need for emergency care, but considers facilities who can document their efforts to establish such a transfer agreement to be in compliance.<sup>14</sup> Because the proposed amendment recognizes that some facilities – through no fault of their own – may not be able to get a transfer agreement with a local hospital, we do not dispute this section. However, we would dispute any expansion that may require a transfer agreement or admitting privileges without exception.

Well-respected medical organizations like the American Medical Association and American College of Obstetricians and Gynecologists have opposed admitting privileges requirements across the country, as they do not reflect current medical practice and provide no real benefit to patients. In the rare instance that a woman would need emergency care in a hospital, the emergency room staff and on-call physicians are available to provide that care, just as they would for any other type of complication.

There are many reasons why a physician providing abortion care would not routinely have hospital admitting privileges, none of which have to do with the quality of care they provide. Requirements for admitting privileges vary substantially from hospital to hospital, depending on the hospital affiliation and administration. As such, hospitals may refuse to grant physicians these privileges because of outside pressure or a religious affiliation, or require physicians to live within a certain distance of the hospital or to admit a minimum number of patients to the hospital each year. These requirements are often insurmountable for practicing physicians, as we have recently seen with the closure of many health care facilities in Texas.

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<sup>13</sup> See *id.* at § 14E.0308(c).

<sup>14</sup> See *id.* at § 14E.0310(c).

For these reasons, we hope that you will continue to listen to medical experts and not expand the transfer agreement requirement.

**VI. The proposed “Surgical Services” amendment should be changed to reflect “medical procedures” rather than “abortion procedures.”**

The proposed amendments require that “[t]he procedure room shall be maintained exclusively for abortion procedures and shall be so designed and maintained to provide an atmosphere free of contamination by pathogenic organisms.”<sup>15</sup> While it appears that the change in the language of this section was intended to expand the uses of the procedure room, it would instead restrict the usage of the procedure rooms for other medical reasons. For example, other medical procedures such as biopsies, colposcopies, and cyst drainage would no longer be able to be provided in a room utilized for abortion care. Likewise, medical abortion, under the current language, would have to be provided in a room that was intended for a surgical abortion procedure. We do not think this was the intent of DHHS and request that the language be modified to reflect the true intention.

**Conclusion**

We appreciate the opportunity to provide you with these comments. We would be happy to work with you, as we have with other health departments, to draft medically-appropriate regulations. Thank you for your time in reviewing our comments.

Sincerely,



Lisa M. Brown  
General Counsel & Senior Policy Director

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<sup>15</sup> See *id.* at § 14E.0311(a).

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Name Chelsea Brown  
E-mail address cbrown2@uncg.edu  
ZIP Code 27804

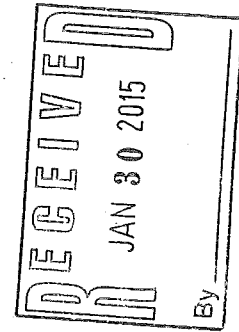
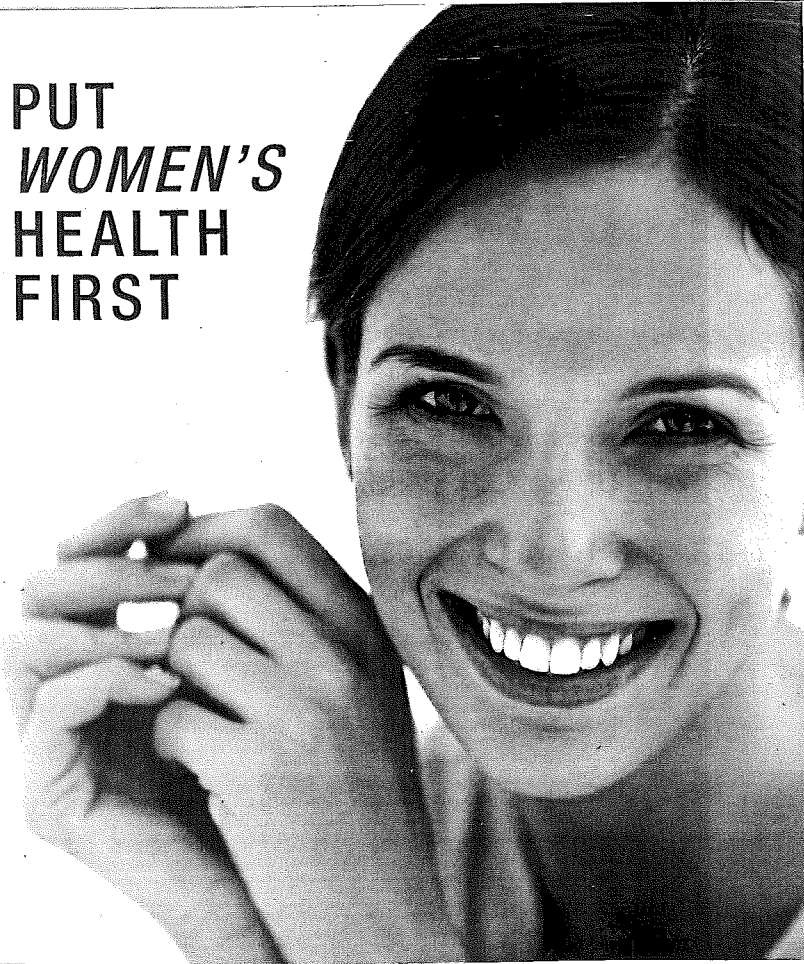
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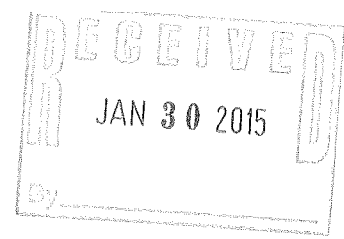


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2701 Mail Service Center  
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FIRST NAME:

LAST NAME:

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Brown

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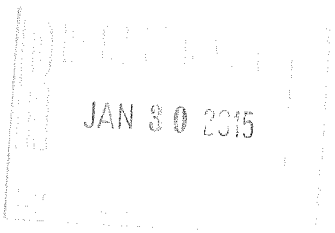
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FIRST NAME:

JANE

LAST NAME:

BROWN

EMAIL:

JANEBROWN@icloud.com

ZIP:

27514

*Optional Comment field:*

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Kristen Brown  
E-mail address kbrown59@proceeds.uncfsu.edu  
ZIP Code 28301

Additional Comments:

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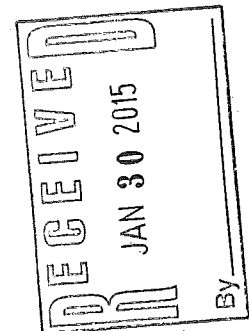
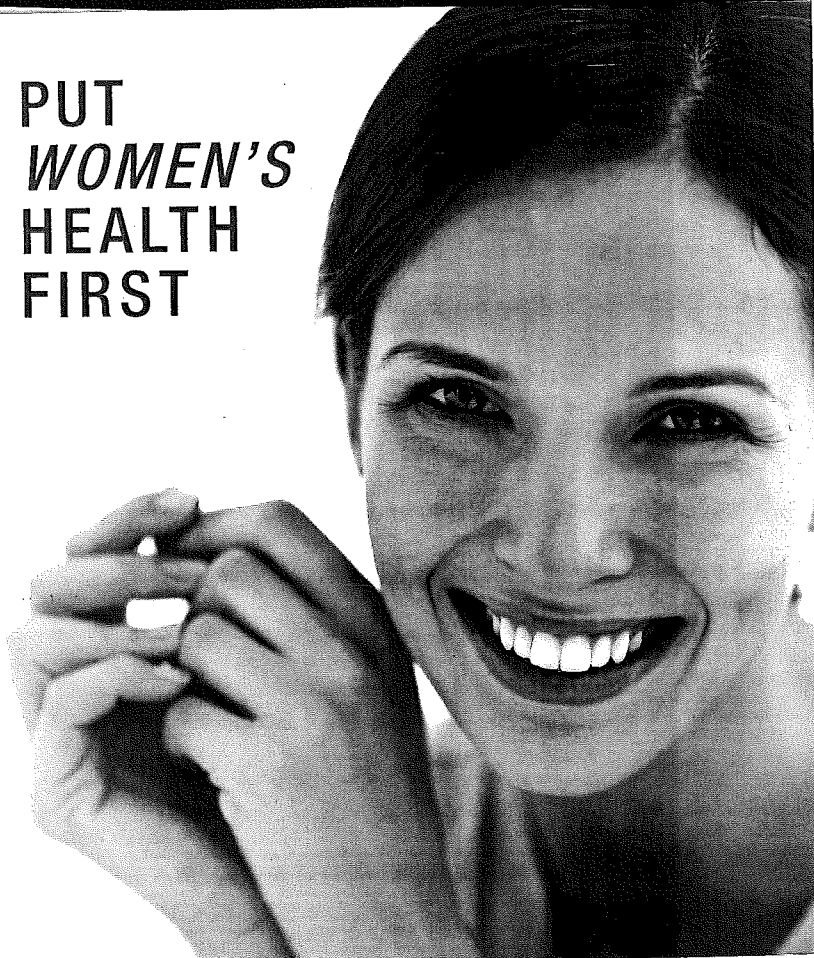
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Name William Boyles  
E-mail address Wboyles2@gmail.com  
ZIP Code 27203

Additional Comments:

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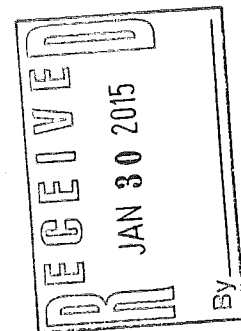
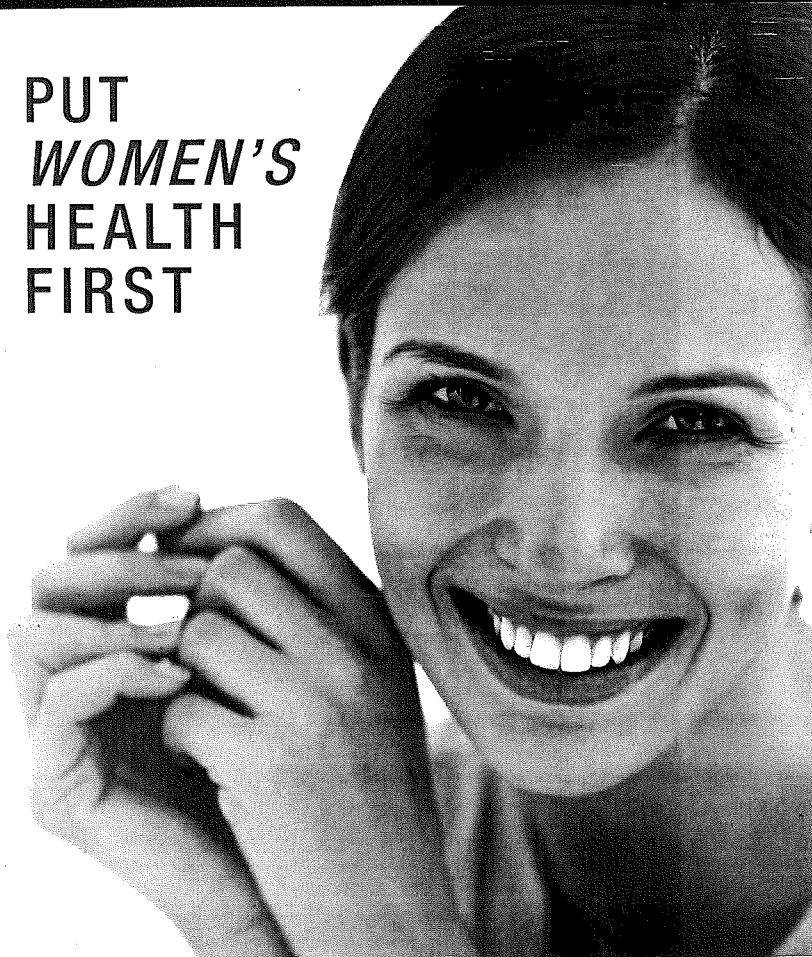
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Yes, I would like to receive updates from organizations supporting this comment:

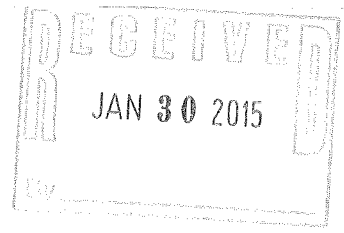


Planned Parenthood Action Fund of North Carolina

PUT  
*WOMEN'S*  
HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



Planned Parenthood Health Systems  
Action Fund, Inc.

**Tell the Department of Health & Human Services: Put Women's Health First**

On December 1, 2014 the Department of Health and Human Services (DHHS) released a set of draft regulations that apply only to abortion providers in NC, in accordance with SB 353 (aka the Motorcycle Abortion Bill) which lawmakers passed in 2013. Regulations like these--generally known as targeted regulation of abortion providers or TRAP law--are a commonplace legislative tactic designed to force women's health centers that offer abortion care to close their doors by imposing burdensome and medically unnecessary requirements. We believe it's critical that the same political interests that forced these rules to be written in the first place not compromise the rule-making process. **Join us in submitting a public comment and tell the Department of Health to continue listening to reproductive health care experts and put women's health first!**

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FIRST NAME:

LAST NAME:

James

Brunner

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Brunnerjam@optonline.net

10021

Optional Comment field:

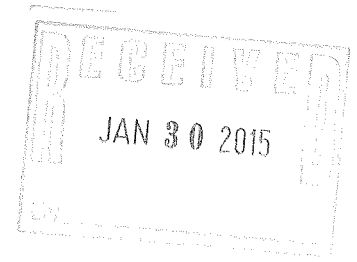
Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC





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FIRST NAME:

LAST NAME:

Dawn Brunner

EMAIL:

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brunwood@optonline.net 28074

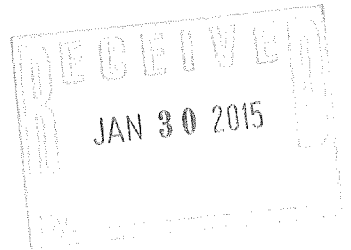
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FIRST NAME:

LAST NAME:

Mara

Brunner

EMAIL:

ZIP:

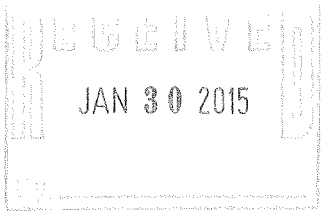
marabrunner@gmail.com

28078

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



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FIRST NAME:

Barbara

LAST NAME:

Brunson

EMAIL:

barbarab@aol.com

ZIP:

28401

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

My name is Dr. Amy Bryant and I am a practicing obstetrician-gynecologist and (title) at the University of North Carolina at Chapel Hill and serve on the Board of NARAL Pro Choice North Carolina. I received my medical training at (medical school, residency, fellowship) and I thank you for this opportunity today to offer comments about the proposed regulations.

Women need access to a full range of reproductive health care services. In my career, I have provided prenatal and labor & delivery care, well-woman visits, cancer screenings, contraception, and abortion. One in 3 women will have an abortion by the age of 45. That means each and every one of us knows a woman who has had an abortion, whether she has told us or not. We owe it to them to make sure that any regulation of abortion is responsible. When the government regulates abortion, it is critical that it does so in a way that both ensures patient safety and preserves access. Policymakers should never impose unjustified regulations in an attempt to prevent women from seeking abortion.

Yet across the country, that is exactly what is happening. Time and time again my colleagues and I are dismayed to see abortion singled out for unjustified regulation, cloaking attacks on abortion access as safety provisions for women. North Carolina deserves better. Regulations need to be grounded in science and represent the current medical standards.

The regulations at issue today are the result of a lengthy process whereby stakeholders from the medical and regulatory communities came together to update and revise existing regulations for abortion clinics in North Carolina. The draft regulations are based largely on current standards for abortion care, medical evidence, practice guidelines, and reflect the careful consideration and input from medical professionals and public health authorities. DHHS was correct in not applying needless ambulatory surgical center regulations to outpatient abortion care. Some opponents of abortion, however, have already signaled their dissatisfaction with such a balanced and rational approach.

I know that many people have complicated feelings when it comes to abortion, but I believe we can all agree that women should have access to the health care that they need. While I regret that political attacks have singled out abortion in North Carolina, I am pleased that the Department of Health and Human Services sought out the input and expertise of medical professionals with great experience caring for women in our community. As a physician, I know that it is imperative that these regulations prioritize patient safety and uphold our excellent standard of care. I hope that this process continues to move forward free from divisive politics and extreme ideology. My patients – the women and families of North Carolina – deserve nothing less.

Thank you.

# TAKE ACTION!

Tell the Department of Health & Human Services:  
Put Women's Health First

"I want to protect women's health and safety, and abortion care already is incredibly safe. The draft regulations proposed by the Department of Health and Human Services were written with extensive input from doctors, health care professionals and reproductive health experts, and they rely on evidence-based medicine. I urge the Department of Health and Human Services to continue to listen to medical experts and support sensible regulations that put women's health first. The reproductive health centers affected by these draft regulations serve thousands of NC women and families and offer a wide range of essential reproductive health services, including family planning, STD testing and treatment, life-saving cancer screenings and annual well-woman exams. The Department of Health and Human Services must put women's health and sound medical practices first when considering any changes to the draft regulations."

Name Annie Jo Buchanan

E-mail address ajobuchanan@gmail.com

ZIP Code 27647

Additional Comments:

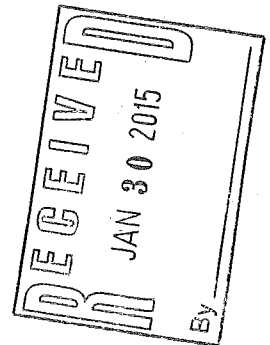
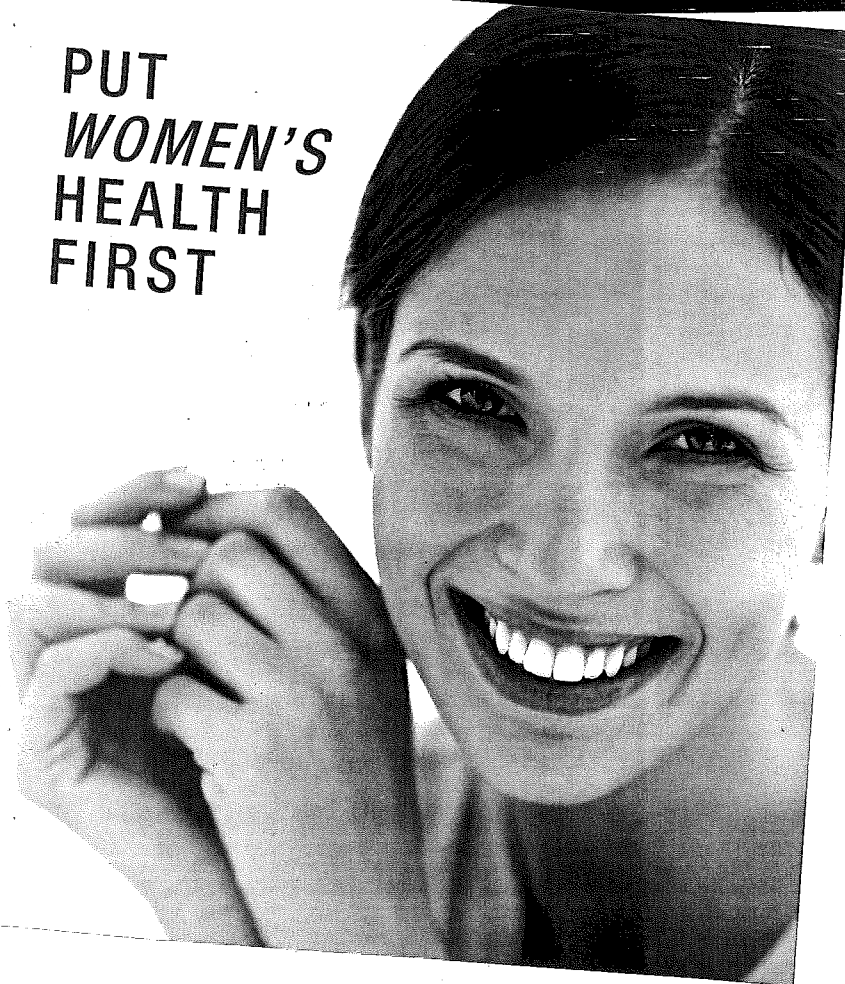
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Yes, I would like to receive updates from organizations supporting this comment:



Planned Parenthood Action Fund of North Carolina

**PUT  
WOMEN'S  
HEALTH  
FIRST**



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Alexander Buckingham  
E-mail address AlexanderBuckingham@gmail.com  
ZIP Code 28801

Additional Comments:

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Yes, I would like to receive updates from organizations supporting this comment:

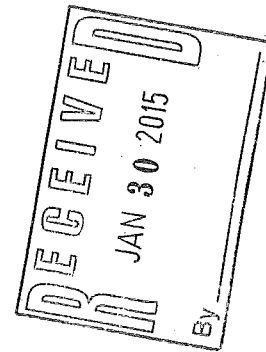


NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

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Name Suzanne Buckley  
E-mail address Suzanne@prochoice.org  
ZIP Code 27707

Additional Comments:

Trust the medical experts & support the proposed rules. Don't put women's health & safety above politics!

Yes, I would like to receive updates from organizations supporting this comment:



NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina



NARAL  
Pro-Choice North Carolina Foundation

To: Nadine Pfeiffer, Division of Health Service Regulation

From: 1,049 North Carolinians Concerned for Women's Health & Safety

Re: Proposed amendments and adoptions of rules in Chapter 10A NCAC 14E Certifications of Clinics for Abortion

Date: January 26, 2015

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We, the undersigned, want to protect women's health and safety, and abortion care already is incredibly safe. The draft regulations proposed by the Department of Health and Human Services were written with extensive input from doctors, health care professionals and reproductive health experts, and they rely on evidence-based medicine. We urge the Department of Health and Human Services to continue to listen to medical experts and support sensible regulations that put women's health first. The reproductive health centers affected by these draft regulations serve thousands of NC women and families and offer a wide range of essential reproductive health services, including family planning, STD testing and treatment, life-saving cancer screenings and annual well-woman exams. The Department of Health and Human Services must put women's health and sound medical practices first when considering any changes to the draft regulations.

FirstName	LastName	City	State	Zip
Whitcomb	Scott	Chapel Hill	NC	27514
Joshua	Davis	Candler	NC	28715
Raishawn	Brown	High Point	NC	27260
Anne	Decocco	Raleigh	NC	27613
Ann	Lewis	Chapel Hill	NC	27517
Constance	Reed	Charlotte	NC	28211
Amanda	Orfitelli	Raleigh	NC	27614
Rebecca	Teeter	Chapel Hill	NC	27516
Jeanne	Sauer	Cary	NC	27513
Ann	Sauls	Gastonia	NC	28054
Ann	Taylor	Raleigh	NC	27612
Tracy	Gentile	Charlotte	NC	28269
Sarah	Wiley	Raleigh	NC	27607
Audrey	Goforth	Asheville	NC	28805
Armando	Vallejo	Charlotte	NC	28226
Bernice	Hedgepeth	Greensboro	NC	27406
Barbara	Belvin	Durham	NC	27704
Brian	Hurley	Apex	NC	27539
Martha	Caves	Roxboro	NC	27574
Bobby	Moody	Raleigh	NC	27616
Britt	Paul	Hillsborough	NC	27278
Jack	Brawley	Charlotte	NC	28226
Brenda	Burns	Pleasant Garden	NC	27313
Donald	Brenner	Wake Forest	NC	27587

Public Comments re: Proposed amendments and adoptions of rules in Chapter 10A NCAC 14E Certifications of Clinics for Abortion



Linda	Quin	Cary	NC	27519
Bradley	Colvard	Bahama	NC	27503
Bradley	Zabel	Winston Salem	NC	27101
April	Moore	Whitsett	NC	27377
Nancy	Sinclair	Greensboro	NC	27410
Joel	Blum	Mebane	NC	27302
Catherine	Lieberman	Mars Hill	NC	28754
Ceilia	Benson	Raleigh	NC	27603
Conrad	Hamrick	Cary	NC	27513
David	Heisler	Cullowhee	NC	28723
Cecelia	Furman	Burnsville	NC	28714
Charles	Perez	Carrboro	NC	27510
Carol	Blue	Hendersonville	NC	28739
Chantal	Caron	Raleigh	NC	27610
Robert	Stiefvater	Durham	NC	27707
Bonnie	Clark	Kittrell	NC	27544
Delores	Armstrong	Raleigh	NC	27609
Harry	Ford	High Point	NC	27265
Colleen	McDaniel	Kannapolis	NC	28083
Charles	Putterman	Raleigh	NC	27610
Michael	Laskowski	Spring Hope	NC	27882
Christal	Cerrone	Durham	NC	27705
Angela	Cooper	High Point	NC	27265
Daniel	Isenogle	Wilmington	NC	28405
Wayne	Dankner	Carrboro	NC	27510
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Diane	Carroll	Carthage	NC	28327
Miriam	Wagner	High Point	NC	27262
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Debra	Brazzel	Durham	NC	27713
Dolores	Calley	Cary	NC	27511
Diane	Bailey	Garner	NC	27529
Diane	Struthers	Lillington	NC	27546
Dorene	Welch	Charlotte	NC	28270
Nikhela	Dingle	Gastonia	NC	28054
Donald	Paschall	Hillsborough	NC	27278
Erin	Williams	Oxford	NC	27565
Nancy	Rains	Beaufort	NC	28516
Esther	Bent	Durham	NC	27701
Elaine	Fisher	Mint Hill	NC	28227
Eleanor	Phillips	Southern Pines	NC	28387
Ellen	Reker	Alexander	NC	28701
Emily	Adams	Wilmington	NC	28403
Jessie	Henderson	High Point	NC	27260
Steven	Bumgarner	Charlotte	NC	28205
James	Fiordalisi	Durham	NC	27713
Daniel	Galligan	Raleigh	NC	27613
Barbara	Gardner	Yanceyville	NC	27379

Genevieve	Benton	Gibsonville	NC	27249
Gloria	Myers	Winston Salem	NC	27103
Amy	Dalgliesh	Powells Point	NC	27966
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Gwenerva	Williams	Raleigh	NC	27610
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Randee	Hartzell	Chapel Hill	NC	27516
George	Hill	Burlington	NC	27217
Henry	Garrett	Winston Salem	NC	27101
Wanda	Nirenberg	Cornelius	NC	28031
Heather	Tepper	Greenville	NC	27834
Marty	Huddleston	Zebulon	NC	27597
Dierdra	Edwards	Winston Salem	NC	27127
Ann	Prince	Chapel Hill	NC	27516
John	Hamrick	Greensboro	NC	27410
Jane	Bace	Wilmington	NC	28409
Jane	Wettach	Durham	NC	27707
Jenny	Angel	Rocky Mount	NC	27804
Paula	Baird	Durham	NC	27713
James	Baydarian	Columbus	NC	28722
Jean	Chard	Raleigh	NC	27606
James	Coggins	High Point	NC	27265
Julius	Davis	Winston Salem	NC	27107
Sandra	Tarantino	Asheville	NC	28805
Jamie	Haddix	Raleigh	NC	27613
Jane	Naus	Ayden	NC	28513
James	Marshall	Asheville	NC	28806
Janalyn	Shotwell	Hickory	NC	28601
Johnnie	Chavis	Durham	NC	27703
Vita	Jones	Durham	NC	27713
Karen	Walton	Raleigh	NC	27610
Joseph	Willingham	Charlotte	NC	28215
John	Heinbockel	Summerfield	NC	27358
Jeanne	Stranahan	Willow Spring	NC	27592
Jimmy	Sizemore	Gatesville	NC	27938
Jerelyn	Travick	Winston Salem	NC	27105
Karen	Donde	Candler	NC	28715
Mary	Goodwin	Asheville	NC	28805
Kathleen	Gardner	Winston Salem	NC	27107
Jennifer	McBride	Raleigh	NC	27612
Kelly	Rubottom	Waxhaw	NC	28173
Karen	Haisty	Raleigh	NC	27612
Karen	Kitridge	Harrisburg	NC	28075
Karen	Norris	Winston Salem	NC	27103
Lillie	Burnette	Chapel Hill	NC	27516

Anna	Toth	Asheville	NC	28806
Laura	Hankins	Charlotte	NC	28216
Lauren	Cundiff	Asheville	NC	28801
Lee	Perlov	Cary	NC	27518
Lisa	Brown	Raleigh	NC	27615
Sarah	Hodges	Winston Salem	NC	27103
Lisa	Gabel	Mebane	NC	27302
Lila	Cate	Asheville	NC	28805
Carolyn	Melton	Pfafftown	NC	27040
Lisa	Holzworth	Raleigh	NC	27613
Annieliese	Myers	Winston Salem	NC	27101
Lois	Jolly	Marshall	NC	28753
Lola	Sloop	Charlotte	NC	28215
Lorey	Seals	Mooresville	NC	28117
Linda	McIntosh	Jamestown	NC	27282
Lucinda	Hensley	Snow Camp	NC	27349
Lupin	Byers-Ogle	Wilmington	NC	28409
Lisa	Weaver	Winston Salem	NC	27106
Lorrie	Weidenhamer	Wake Forest	NC	27587
Lynn	Howland	Winston Salem	NC	27104
Mable	Parker	Charlotte	NC	28215
Nancy	Kelly	Old Fort	NC	28762
Sheila	Anderson-Lewis	Rocky Point	NC	28457
Bonnie	Dixon	Franklinton	NC	27525
Wilma	Clemonts	Garysburg	NC	27831
Marla	Harwell	Kannapolis	NC	28081
Marlene	Rosol	Raleigh	NC	27613
Seth	Twery	Charlotte	NC	28214
Marie	Flanagan	Raleigh	NC	27617
Julie	Mayberry	Raleigh	NC	27601
Mary	Cristinziano	Wake Forest	NC	27587
Maura	Dillon	Raleigh	NC	27604
Mary	Edwards	Southern Pines	NC	28387
Mildred	Powell	Greensboro	NC	27403
Gretchen	Klein	Climax	NC	27233
Henrietta	Barksdale	Clayton	NC	27520
Michele	Morrice	Charlotte	NC	28211
Millicent	Mitchell	Charlotte	NC	28210
Marian	Merewether	Clayton	NC	27527
Miriam	Hughes	Hendersonville	NC	28739
Missy	Tenhet	Oriental	NC	28571
Meridith	Miller	Asheville	NC	28804
Susan	Cottle	Raleigh	NC	27603
Anita	Grant	Fayetteville	NC	28314
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Nancy	Cross	Wilmington	NC	28403
Nancy	Baughman	Raleigh	NC	27606
Nancy	Edwards	Greensboro	NC	27410
Marian	Smith	Gastonia	NC	28052

Nancy	Jeffers	High Point	NC	27265
Susan	Burke	Charlotte	NC	28277
Nikki	Taylor	High Point	NC	27265
Frank	Gladden	Mebane	NC	27302
Pamela	Shook	Charlotte	NC	28227
Jeffrey	Swanson	Chapel Hill	NC	27514
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Pamela	Diliberto	Pittsboro	NC	27312
Phyllis	Moore	Durham	NC	27707
Thomas	Adkisson	Winston Salem	NC	27103
Wilbur	Eggleston	Durham	NC	27713
Henry	Plachcinski	Durham	NC	27704
Pamela	Freedman	Chapel Hill	NC	27516
Anna	Quackenbush	Charlotte	NC	28216
Rita	Fellers	Chapel Hill	NC	27516
Joan	Arnold	Raleigh	NC	27613
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Sandra	Finch	Raleigh	NC	27603
Saundra	Foudin	Wake Forest	NC	27587
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Shelley	Holczer	Clayton	NC	27520
Sherry	Smith	Cherryville	NC	28021
Katherine	Daley	Hendersonville	NC	28792
Dana	Sizemore	Fuquay Varina	NC	27526
Ashley	Johnson	King	NC	27021
Susan	Margolis	Cary	NC	27511
Marian	Smith	King	NC	27021
Adam	Sotak	Durham	NC	27713
Mark	Riegel	Greensboro	NC	27407
Shau-Hong	Toscano	Chapel Hill	NC	27516
Susan	Getsy	Hubert	NC	28539
Susan	Senzon	Asheville	NC	28804
Richard	Johnston	Wilmington	NC	28403
Teresa	Kelly	Colfax	NC	27235

Tammy	Shenkel	Sanford	NC	27330
Tamara	Fleischer	Elon	NC	27244
Teresa	Katis	Clemmons	NC	27012
Terry	Gasperino	Mebane	NC	27302
Terry	Sawyers	Raleigh	NC	27613
Teresa	Thornsley	Cary	NC	27511
Tifani	Hencke	Chapel Hill	NC	27516
Tamara	Tal	Durham	NC	27707
Steven	Assaid	Cary	NC	27519
Patricia	Atteberry	Charlotte	NC	28226
Lynda	Tull	Wilmington	NC	28403
Pamela	Pruett	Candler	NC	28715
Uzoma	Nwosu	Chapel Hill	NC	27516
Paul	Vernier	Pisgah Forest	NC	28768
Shelby	Wall	Fuquay Varina	NC	27526
Elizabeth	Edmiston	Durham	NC	27712
Karen	Bluestein	Cary	NC	27513
Jennifer	Weickum	Clayton	NC	27527
Beverly	Sherron	Cary	NC	27511
Katie	Williams	Asheville	NC	28801
Wanda	Watkins	Durham	NC	27707
Wendelyn	Odell	Greensboro	NC	27455
Jacque	Thurston	Burnsville	NC	28714
Lisa	Kaszycki	Cary	NC	27513
Barbara	Settlemyre	Cary	NC	27513
Elizabeth	Latimore Adams	Raleigh	NC	27606
Michele	Lynch	Raleigh	NC	27606
Jeffrey	McAfee	Raleigh	NC	27606
Melinda	Wilkinson	Raleigh	NC	27606
Janet	Groblewski	Cary	NC	27513
Michele	Yellin	Cary	NC	27511
Irene	Fried	Cary	NC	27513
Marie				
France	Quillen	Cary	NC	27513
Marianne	Crafts-Brandner	Cary	NC	27513
Lyn	Jackson	Cary	NC	27513
G	Byron-Cox	Cary	NC	27511
Kirsten	Reberg-Horton	Raleigh	NC	27606
June	Jeffreys	Raleigh	NC	27606
Marian	Larrea	Cary	NC	27513
Cheryl	Phillips	Raleigh	NC	27607
Margaret	Carter	Raleigh	NC	27603
Lincoln	Hancock	Raleigh	NC	27601
Vermelle	Wilson	Garner	NC	27529
Mae	Council	Raleigh	NC	27610
Adriene	Wilson	Raleigh	NC	27610
Homie	Burrell	Garner	NC	27529
Vickie	Presnell	Raleigh	NC	27609
Teresa	Lyons	Raleigh	NC	27607

Anne	Cooke	Raleigh	NC	27612
Margaret	McLaurin	Raleigh	NC	27608
Margaret	Schucker	Raleigh	NC	27609
Karen	Broderick	Raleigh	NC	27609
Kathy	Phillips	Raleigh	NC	27608
Teresa	Hart	Raleigh	NC	27608
Ann	Garey	Raleigh	NC	27608
Linda	Babcock	Raleigh	NC	27607
Harlan	Shays	Raleigh	NC	27608
Susan	Harris	Raleigh	NC	27608
Leslie	Langley	Raleigh	NC	27613
Christine	Soldin	Raleigh	NC	27612
Thea	Anthony	Raleigh	NC	27604
Sandra	Chrisawn	Raleigh	NC	27609
Anna	Jones	Raleigh	NC	27609
Edward	Scarboro	Wake Forest	NC	27587
Mary	Moore	Wake Forest	NC	27587
Kelly	Richardson	Zebulon	NC	27597
Geraldine	Von Spreckelsen	Raleigh	NC	27616
Emily	Cole	Wake Forest	NC	27587
Debra	Bruck	Cary	NC	27511
Ellen	Chambers	Apex	NC	27539
Donna	Gray	Fuquay Varina	NC	27526
Karyn	Kersey	Cary	NC	27513
Kathryn	Orsatti	Apex	NC	27502
Angie	Gaertner	Apex	NC	27502
Gordon	Hutchison	Cary	NC	27511
Darin	Figurskey	Apex	NC	27502
Sharron	Bouquin	Apex	NC	27539
Mavis	Maynard	Apex	NC	27539
Angela	Gouge	Apex	NC	27539
Marianne	Burke	Cary	NC	27518
Paul	McSorley	Cary	NC	27511
Debra	Alpert	Cary	NC	27511
Tamara	Lowell	Apex	NC	27502
Kenneth	Hilgers	Cary	NC	27511
Davina	Kenny	Raleigh	NC	27606
Fred	Tucker	Apex	NC	27539
Charles	Hall	Raleigh	NC	27603
Walter	Fitchett	Cary	NC	27511
Robin	Ringo	Apex	NC	27539
Janet	Dimambro	Fuquay Varina	NC	27526
Clarissa	Harden	Apex	NC	27539
Scott	Fairbrother	Apex	NC	27502
Tina	Partin	Raleigh	NC	27603
Barbara	Lehenbauer	Raleigh	NC	27603
Maureen	Shreve	Raleigh	NC	27603
Gerald	Harris	Apex	NC	27523
Dixie	Pauley	Fuquay Varina	NC	27526

Wilson	Grant	Holly Springs	NC	27540
David	Markle	Fuquay Varina	NC	27526
Monice	Fulwood	Fuquay Varina	NC	27526
Sheila	McNeely	Apex	NC	27502
Larry	Gooch	Garner	NC	27529
Peter	Grabowski	Fuquay Varina	NC	27526
Susan	Thomas	Raleigh	NC	27603
Pamela	Thombs	Raleigh	NC	27603
Anita	Culler	Apex	NC	27523
Jacqueline	Scott	Holly Springs	NC	27540
William	McCroskey	Apex	NC	27502
Raymond	Morgan	Raleigh	NC	27603
Janice	Lundy	Raleigh	NC	27616
Kermit	Richardson	Raleigh	NC	27610
Claudia	Shows	Raleigh	NC	27616
Evelyn	Satterfield	Raleigh	NC	27604
Patricia	Bauer	Knightdale	NC	27545
Lorraine	Ruffin	Raleigh	NC	27610
Clarice	Brown	Raleigh	NC	27616
Pauline	Hardy-Evans	Raleigh	NC	27610
Darryl	Bridges	Raleigh	NC	27604
Lucy	Serge	Raleigh	NC	27616
Charmain	Skinner	Raleigh	NC	27610
Jennifer	McKay	Raleigh	NC	27616
Timothy	Moulthrop	Raleigh	NC	27604
Barbara	Lavalette	Raleigh	NC	27616
Kirk	Newcross	Raleigh	NC	27610
Cary	Perry	Raleigh	NC	27604
Samantha	Owen	Raleigh	NC	27616
Mayzell	Jacobs	Garner	NC	27529
Stuart	Mills	Knightdale	NC	27545
Nancy	Pulley	Zebulon	NC	27597
Renee	Nilles	Knightdale	NC	27545
Gregory	MacKey	Raleigh	NC	27610
Donna	Deangelo	Garner	NC	27529
Burton	White	Raleigh	NC	27616
Eula	Jones-Hill	Garner	NC	27529
Joseph	Cotton	Garner	NC	27529
Lloyd	Glasgow	Zebulon	NC	27597
Michael	Mazur	Zebulon	NC	27597
Carolyn	Kidder	Raleigh	NC	27603
Donna	Ward	Raleigh	NC	27604
Sheila	Hall	Garner	NC	27529
Myra	Oneal	Zebulon	NC	27597
Joseph	Staggers	Zebulon	NC	27597
Andrea	Hill	Garner	NC	27529
Jewel	Weppelman	Wake Forest	NC	27587
Sheila	Boyce	Raleigh	NC	27613
Patricia	Oshaughnessy	Raleigh	NC	27614

Stephanie	Semke	Raleigh	NC	27613
Sally	Nickerson	Raleigh	NC	27613
Carla	Whitehurst	Morrisville	NC	27560
Michael	Nemecek	Raleigh	NC	27612
Katyna	Borroto-Esoda	Raleigh	NC	27613
Scott	Billman	Raleigh	NC	27614
Benjamin	Gaines	Raleigh	NC	27613
Melinda	Cook	Raleigh	NC	27614
Joyce	Grice	Raleigh	NC	27614
Heather	Chesnick	Apex	NC	27523
Sylvia	Nygaard	Cary	NC	27513
Lisa	Sacco	Cary	NC	27519
Lorraine	Ormsby	Cary	NC	27519
Kelly	Doyle	Cary	NC	27513
Miriam	Sauls	Raleigh	NC	27615
Catherine	Lehman	Raleigh	NC	27612
Cynthia	Heath	Raleigh	NC	27615
Karen	Solari	Raleigh	NC	27609
Chad	Hough	Raleigh	NC	27612
Sharon	Ferguson	Raleigh	NC	27614
Mark	Buckalew	Raleigh	NC	27615
Angela	Dowd	Raleigh	NC	27609
Angela	Carroll	Raleigh	NC	27608
Karen	Perrone	Raleigh	NC	27609
Susan	Whitmeyer	Raleigh	NC	27609
Carolyn	Younger	Raleigh	NC	27608
Terry	Beasley	Raleigh	NC	27613
Holly	Revels	Raleigh	NC	27609
Donald	Wells	Raleigh	NC	27609
Jean	Scaraglino	Raleigh	NC	27615
Stuart	Rodwell	Raleigh	NC	27613
Sherrill	Laffey	Raleigh	NC	27612
Barbara	Gaunce	Raleigh	NC	27615
Wynn	Dorsett	Raleigh	NC	27608
Kristine	Carraway	Raleigh	NC	27613
Pamela	Rouse	Raleigh	NC	27615
Lisa	Reid	Raleigh	NC	27608
Ann	Buff	Raleigh	NC	27613
Karen	Helm	Raleigh	NC	27612
William	Pleasant	Raleigh	NC	27612
Randy	Drawas	Raleigh	NC	27615
Christine	Fripp	Henderson	NC	27537
Richard	Marshall	Waxhaw	NC	28173
Patricia	Tucker	Waxhaw	NC	28173
Elizabeth	Hawfield	Waxhaw	NC	28173
Therese	Price	Matthews	NC	28104
Sandra	Smith	Monroe	NC	28110
Barbara	Allison	Pisgah Forest	NC	28768
Jeanne	Simons	Brevard	NC	28712



Paul	Foster	Pinnacle	NC	27043
Virginia	Legg	Pinnacle	NC	27043
James	Lovell	King	NC	27021
Eva	Cowan	Danbury	NC	27016
Britt	Uzzell	Germanton	NC	27019
Ruth	Joyner	Locust	NC	28097
Sherry	Hoffman	Rutherfordton	NC	28139
Kimberly	Sherrill	Chimney Rock	NC	28720
Janice	Truemper	Salisbury	NC	28144
Martha	Christy	Kannapolis	NC	28081
Tana	Austin	Eden	NC	27288
David	Wilson	Stoneville	NC	27048
James	Major	Red Springs	NC	28377
Ann	Johnson	Trinity	NC	27370
Emmy	Summers	Tryon	NC	28782
Stephen	Atkinson	Greenville	NC	27858
Sherrian	Brown	Winterville	NC	28590
Erica	Mulholland	Greenville	NC	27834
Delle	Ivey	Rougemont	NC	27572
Mary	Crumpler	Hurdle Mills	NC	27541
Amber	Kirkley	Rougemont	NC	27572
Dianne	Layden	Belvidere	NC	27919
Angie	Sylvester	Elizabeth City	NC	27909
Susan	Cheatham	Arapahoe	NC	28510
Evelyn	Morris-Hecht	Chapel Hill	NC	27516
Robert	Crabtree	Hillsborough	NC	27278
Jonas	Monast	Durham	NC	27705
Kimberly	Glenn	Hillsborough	NC	27278
Lisa	Hedgepeth	Hillsborough	NC	27278
Kathleen	Kearns	Chapel Hill	NC	27517
Allison	Knight	Hurdle Mills	NC	27541
Donna	Goldstein	Chapel Hill	NC	27514
Caren	Lobo	Chapel Hill	NC	27516
Cheryl	Ellis	Hillsborough	NC	27278
Deanna	Crigler	Chapel Hill	NC	27514
Gail	Crane	Hillsborough	NC	27278
Ricky	Overman	Efland	NC	27243
Emily	Adams	Efland	NC	27243
Mary	Fulkerson	Hillsborough	NC	27278
Jerry	White	Durham	NC	27705
Joyce	Vinson-Davis	Chapel Hill	NC	27516
Karen	Hoffmann	Chapel Hill	NC	27516
Marilie	Gammon	Carrboro	NC	27510
Kristen	Phend	Hillsborough	NC	27278
Alice	Bohlen	Chapel Hill	NC	27516
Gretta	Horton	Chapel Hill	NC	27516
Emily	Wilkins	Hillsborough	NC	27278
Rebecca	King	Chapel Hill	NC	27517
Misako	Toda	Chapel Hill	NC	27514

Michelle	Jordy	Carrboro	NC	27510
Linda	Varblow	Chapel Hill	NC	27516
Barbara	Hapgood	Chapel Hill	NC	27514
Amy	Athavale	Carrboro	NC	27510
Lisa	Brachman	Chapel Hill	NC	27514
Alison	Taylor	Hillsborough	NC	27278
Sandra	Reynolds	Chapel Hill	NC	27514
Doreen	Stein-Seroussi	Carrboro	NC	27510
Terry	Handy	Hillsborough	NC	27278
Gregory	Morris	Hillsborough	NC	27278
James	Troy	Chapel Hill	NC	27516
Josephine	Borden	Hillsborough	NC	27278
Adam	Versenyi	Carrboro	NC	27510
William	Pfeiffer	Hillsborough	NC	27278
Elizabeth	Presler-Marshall	Chapel Hill	NC	27516
Tracy	Boggs	Chapel Hill	NC	27514
Daisy	Satterwhite	Chapel Hill	NC	27516
Kimberly	Saussy	Chapel Hill	NC	27514
Joseph	Kennedy	Chapel Hill	NC	27516
Jeannine	Guthrie	Chapel Hill	NC	27516
Jamie	Sohn	Carrboro	NC	27510
Judy	McGarrah	Jacksonville	NC	28546
Stanley	Fioroni	Jacksonville	NC	28540
Bridget	Rebillard	Wilmington	NC	28409
Wendy	Dahlin	Wilmington	NC	28412
William	Archer	Wilmington	NC	28409
David	Dipaolo	Wilmington	NC	28411
Karen	Jacobson	Wilmington	NC	28411
Teresa	Crist	Wilmington	NC	28411
Karen	Vaughn	Wilmington	NC	28409
Gwendolyn	Wilkins	Rocky Mount	NC	27803
Edwin	Skinner	Rocky Mount	NC	27804
Patricia	Tomlinson	Rocky Mount	NC	27803
William	Royals	Red Oak	NC	27868
Joyce	Reehling	Pinehurst	NC	28374
Debra	MacHen	Charlotte	NC	28203
Erin	Holland	Charlotte	NC	28203
Arlene	Roman	Charlotte	NC	28210
Joyce	Blakeney	Charlotte	NC	28210
Susan	Gindra	Charlotte	NC	28210
Catherine	Metze	Charlotte	NC	28210
Joanna	Quantz	Charlotte	NC	28209
Dandris	Davis	Charlotte	NC	28210
Jill	Sochacki	Charlotte	NC	28209
Becky	Feldman	Huntersville	NC	28078
Sheri	McElroy-Starratt	Charlotte	NC	28273
Jane	Brumbaugh	Huntersville	NC	28078
Mary	McCoy	Huntersville	NC	28078
Clementine	Walton	Charlotte	NC	28278

Elizabeth	Marett	Charlotte	NC	28210
Myra	Eanes	Charlotte	NC	28214
Michael	Tipton	Charlotte	NC	28273
Kathy	Beam	Davidson	NC	28036
Latonya	Jetton	Davidson	NC	28036
Pamela	Zelinski	Charlotte	NC	28269
Steven	Paynter	Cornelius	NC	28031
Karin	Dimarco	Charlotte	NC	28269
Karna	Schantz	Charlotte	NC	28269
Janet	Bostian	Davidson	NC	28036
Sue	Seminario	Davidson	NC	28036
Anne	McNeill	Charlotte	NC	28269
Virginia	Roseman	Davidson	NC	28036
Shannon	Ward	Huntersville	NC	28078
Carl	Robinson	Charlotte	NC	28215
Diane	Wassum	Charlotte	NC	28213
Amethyst	Klein	Charlotte	NC	28212
James	Cook	Charlotte	NC	28212
Sandra	Weaver	Charlotte	NC	28205
Dennis	Salmen	Charlotte	NC	28205
Margaret	Arnold	Charlotte	NC	28205
Melissa	Dickson	Matthews	NC	28105
Thomas	Ottman	Charlotte	NC	28227
Christina	Hyde	Charlotte	NC	28227
Sandra	Burgess	Charlotte	NC	28205
George	Tate	Charlotte	NC	28205
Jeanne	Lovschal	Charlotte	NC	28205
Phyllis	Cunningham	Charlotte	NC	28212
Thomas	Muller	Charlotte	NC	28212
Allison	Billings	Charlotte	NC	28205
William	Hoare	Charlotte	NC	28214
Gwendolyn	Moore	Charlotte	NC	28214
Peter	Gech	Charlotte	NC	28216
Ronjent	Davis	Charlotte	NC	28216
Cynthia	Price	Charlotte	NC	28214
Patrick	Lee	Charlotte	NC	28208
Angelo	Jones	Charlotte	NC	28208
Elizabeth	Brisendine	Charlotte	NC	28214
Alfredia	Neal	Charlotte	NC	28214
Kenneth	McMichael	Charlotte	NC	28214
Arrington	Mixon	Charlotte	NC	28207
Katherine	Rivers	Charlotte	NC	28217
Sarah	Mathis	Charlotte	NC	28217
Laurie	Hemion	Charlotte	NC	28207
Lamonte	Sanders	Charlotte	NC	28273
Audra	Reid	Charlotte	NC	28215
Kathe	Cohen	Matthews	NC	28105
Lisa	Moore	Matthews	NC	28105
Therese	Odonnell	Matthews	NC	28105

Susan	Crawford	Matthews	NC	28105
Judi	Ragsdale	Charlotte	NC	28215
Lawrence	Lester	Matthews	NC	28105
Holly	Hajduk	Matthews	NC	28105
Ray	Henderson	Mint Hill	NC	28227
Renee	Garner	Matthews	NC	28105
Susan	Weedon	Charlotte	NC	28227
Linda	Bellamy	Mint Hill	NC	28227
Jennifer	Mainor	Charlotte	NC	28215
Elizabeth	Walker	Mint Hill	NC	28227
Lamont	Greene	Mint Hill	NC	28227
Catherine	Stewart	Matthews	NC	28105
Regina	McNair	Midland	NC	28107
Martin	Pearsall	Mint Hill	NC	28227
Eleni	Saunders	Charlotte	NC	28226
Mary	Dickson	Charlotte	NC	28226
Mary Jo	Koenig	Charlotte	NC	28226
Emma	Gunn	Charlotte	NC	28270
Janice	Kilgo	Charlotte	NC	28270
Richard	Zollinger	Charlotte	NC	28226
Judy	August	Charlotte	NC	28226
Beth	Scarboroughh	Charlotte	NC	28226
Quinn	Davidson	Charlotte	NC	28210
Sarah	McKinley	Charlotte	NC	28226
Catherine	Decramer	Charlotte	NC	28270
Carol	Hall	Charlotte	NC	28226
Patricia	Bowman	Charlotte	NC	28277
Vicki	Neumann	Charlotte	NC	28226
Sarah	Peacock	Charlotte	NC	28211
Claire	Buie	Charlotte	NC	28226
Julie	Hill	Charlotte	NC	28270
Laura	MacLean	Charlotte	NC	28270
Ann	Richards	Charlotte	NC	28226
Katherine	Auron	Charlotte	NC	28270
Laura	Carpenter	Charlotte	NC	28277
Cale	Byers	Charlotte	NC	28270
Martha	Currie	Charlotte	NC	28277
Lorraine	Fischer	Charlotte	NC	28277
Carl	Jones	Charlotte	NC	28226
Catherine	Cover	Pineville	NC	28134
Michael	Shires	Charlotte	NC	28277
Tracie	Famber	Charlotte	NC	28213
John	Witherspoon	Charlotte	NC	28213
Rose	Dunlap	Charlotte	NC	28269
Tunia	Gee	Charlotte	NC	28213
Yvette	Smith	Charlotte	NC	28213
Sylvia	Casey	Charlotte	NC	28213
Janis	Weathers	Charlotte	NC	28269
Netra	Cochran	Charlotte	NC	28262

Mamie	Johnson	Charlotte	NC	28213
Dorothy	Mayo	Charlotte	NC	28269
Lillian	Bynum	Charlotte	NC	28262
Dean	Davey	Charlotte	NC	28269
Dawn	Hartung	Charlotte	NC	28269
Sherri	Gaston	Charlotte	NC	28206
Patrice	Thompson	Charlotte	NC	28262
Robyn	Morris	Charlotte	NC	28269
Patricia	Sexton	Charlotte	NC	28262
Thelma	Houston	Charlotte	NC	28216
Phylle	Foxwell	Williamston	NC	27892
Gilbert	Henry	Mars Hill	NC	28754
Robin	Konieczny	Stanley	NC	28164
Kimberly	Carlberg	Sanford	NC	27332
Elizabeth	Yopp	Clayton	NC	27520
Barbara	Mandley	Garner	NC	27529
William	Coats	Benson	NC	27504
Lynn	Stephenson	Willow Spring	NC	27592
Nancy	Smith	Sylva	NC	28779
Linda	Wolf	Whittier	NC	28789
Linda	Chermak	Tuckasegee	NC	28783
Deborah	Hunt	Sapphire	NC	28774
Richard	Rodberg	Statesville	NC	28625
Kate	Williams	Mooreville	NC	28115
Virginia	Cowan	Mooreville	NC	28115
Robert	Bridges	Mooreville	NC	28115
Sandra	Shealy	Mooreville	NC	28117
Tracy	Grimm	Mooreville	NC	28117
Michael	Deberardino	Mooreville	NC	28115
Eva	Harris	Mooreville	NC	28117
Judy	Sherrill	Mooreville	NC	28115
Mary	Hecker	Flat Rock	NC	28731
Allyson	Brown	Horse Shoe	NC	28742
Paula	Delorenzo	Mills River	NC	28759
Letha	Abeln	Hendersonville	NC	28739
Maria	Kuroshchepova	Hendersonville	NC	28792
Paula	West	Mills River	NC	28759
Sarah	Zambon	Fletcher	NC	28732
Kathleen	Basiewicz	Hendersonville	NC	28792
Karen	Alexander	Hendersonville	NC	28792
Beverly	Banks	Clyde	NC	28721
Blair	Fesperman	Waynesville	NC	28785
Whitney	Burton	Waynesville	NC	28786
Susan	Scruggs	Waynesville	NC	28785
Bonnie	Mueller	Waynesville	NC	28786
Rebecca	Mangum	Angier	NC	27501
Scott	Hale	Lillington	NC	27546
Julia	Powell	Roanoke Rapids	NC	27870
James	McQueen	Greensboro	NC	27405

David	Brown	Greensboro	NC	27408
Terry	Hatcher	Browns Summit	NC	27214
Cheryl	Pratt	Greensboro	NC	27401
Kathleen	Caviness	Browns Summit	NC	27214
Sandra	Jenkins	Greensboro	NC	27405
Verna	Morgan	Greensboro	NC	27403
David	Sanderson	Greensboro	NC	27408
Jane	Walker	Greensboro	NC	27408
Douglas	Key	Greensboro	NC	27408
Donna	Clark	Greensboro	NC	27455
Brandon	Burnett	Greensboro	NC	27455
Robin	Lund	Greensboro	NC	27405
Linda	Cardwell	Greensboro	NC	27408
Robert	Wineburg	Greensboro	NC	27401
Julie	Peeples	Greensboro	NC	27403
Nancy	Kunberger	Greensboro	NC	27408
Christopher	Ndukwu	Greensboro	NC	27455
Amy	Stringer	Greensboro	NC	27455
Lou	Ayers	Greensboro	NC	27405
Ellen	Edwards	Greensboro	NC	27410
Robert	Martin	Greensboro	NC	27401
David	Britton	Greensboro	NC	27403
Christian	Hardy	Greensboro	NC	27410
George	Bailey	Greensboro	NC	27403
Kathryn	Pike	Greensboro	NC	27408
Tamilynn	Washington	Greensboro	NC	27406
Sara	Angel	Greensboro	NC	27403
Melodie	Beck	Greensboro	NC	27410
Stephen	Alston	Greensboro	NC	27406
Sandra	Gist	Greensboro	NC	27401
Heli	Koppel-Benson	Greensboro	NC	27408
Carol	Simpson	Greensboro	NC	27408
Anne	Deutsch	Greensboro	NC	27408
Willie	Stafford	Greensboro	NC	27410
Joyce	Caldwell	Greensboro	NC	27401
Charles	Whiteside	Greensboro	NC	27406
Katie	Hicks	Greensboro	NC	27406
Ronnie	Grabon	Greensboro	NC	27410
Debbi	Aberman	Greensboro	NC	27410
Donald	Russell	Greensboro	NC	27455
Gloria	Alston	Greensboro	NC	27406
Denise	Young	Browns Summit	NC	27214
Jonathan	Sawyer	Greensboro	NC	27455
Ann	Trammell	Browns Summit	NC	27214
Lucia	Deratmiroff	Greensboro	NC	27455
Kimberly	Fraley-Wise	Browns Summit	NC	27214
Deborah	Leclear	Mc Leansville	NC	27301
Lisa	Setliff	Greensboro	NC	27455
Michael	Brady	Gibsonville	NC	27249

Jennifer	Kimbrough	Summerfield	NC	27358
Donna	Devaney	Greensboro	NC	27455
Sandra	Utberg	Gibsonville	NC	27249
Lori	Knibb	Climax	NC	27233
Anne	Gable	Greensboro	NC	27410
Ava	Moore	Greensboro	NC	27406
Shelia	Gregson	Julian	NC	27283
Larry	Murphy	Greensboro	NC	27408
Denise	Troxler	Greensboro	NC	27406
Rene	Summerlin	Julian	NC	27283
Deborah	Livingston	Browns Summit	NC	27214
Tammy	Pace	Greensboro	NC	27408
Susan	Kincaid	Greensboro	NC	27455
Betty	Morgan	Greensboro	NC	27408
Teresa	Corn	Mc Leansville	NC	27301
James	Owen	Julian	NC	27283
Leta	Pius	Greensboro	NC	27455
Cathy	Lichauer	Greensboro	NC	27407
Sherry	Boris	High Point	NC	27265
Susan	Snead	Jamestown	NC	27282
Dora	Greenlee	Greensboro	NC	27406
Sandra	Goode	Greensboro	NC	27407
Reginald	Glover	Greensboro	NC	27406
Yourah	Middlebrooks	High Point	NC	27260
Larry	Chandler	Greensboro	NC	27407
Anthony	Inge	Greensboro	NC	27407
Nancy	Hertlein	Greensboro	NC	27407
Robyn	Miller	Greensboro	NC	27406
Terri	Frid	Jamestown	NC	27282
Susan	Lewis	High Point	NC	27262
Dennis	Thompson	High Point	NC	27265
Ina	Siler	High Point	NC	27265
Stephanie	Edgerton-Dean	High Point	NC	27265
Etta	Kirkman	Greensboro	NC	27406
Sherry	Stookey	High Point	NC	27265
Susan	Kirschner	Greensboro	NC	27407
Kerry	Gibhardt	High Point	NC	27265
Harold	Parker	Jamestown	NC	27282
Janet	Millis	High Point	NC	27262
Jeffrey	Wellman	Greensboro	NC	27407
Charles	Plummer	Jamestown	NC	27282
Brian	Martin	High Point	NC	27265
Tara	Blomquist	Jamestown	NC	27282
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Georgia	Amick	Pleasant Garden	NC	27313
Susan	Hampton	Greensboro	NC	27406
Jessica	Mitchell	Greensboro	NC	27407
Patricia	Stressler	Greensboro	NC	27407

Diane	Conterno-Neese	High Point	NC	27265
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Andrew	Stanley	Greensboro	NC	27407
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Ronald	Hutton	Stokesdale	NC	27357
Marie	Schmitz	Stokesdale	NC	27357
George	Irwin	Greensboro	NC	27407
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Robin	Brueckmann	Summerfield	NC	27358
Sally	Yearwood	Oxford	NC	27565
Clarence	Jordan	Franklinton	NC	27525
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Kimberly	Singleton	Gastonia	NC	28054
Charles	Godwin	Gastonia	NC	28056
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Thomas	McKiernan	Winston Salem	NC	27106
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Lorre	Ruffin	Winston Salem	NC	27106



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Judith	Redmon	Winston Salem	NC	27105
John	Griffith	Winston Salem	NC	27101
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Michael	Greer	Kernersville	NC	27284
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Joanna	Leonard	Winston Salem	NC	27104
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Teresa	Lindsey	Tobaccoville	NC	27050
Jennifer	Jobe	Rural Hall	NC	27045
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Jane	Cline	Clemmons	NC	27012
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Woodrow	Childress	Kernersville	NC	27284

Tammy	McKoy	Winston Salem	NC	27127
Saundra	Garner	Kernersville	NC	27284
Cornelia	Corey	Clemmons	NC	27012
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Marcia	Rego	Durham	NC	27707
Earl	Glass	Durham	NC	27713
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Sharon	Humphreys	Durham	NC	27705
Robin	Rooney	Durham	NC	27713
Valerie	Ehrhardt	Durham	NC	27705
Elizabeth	Livingston	Durham	NC	27707
Suzanne	Todd	Chapel Hill	NC	27517
Meredith	Emmett	Durham	NC	27705

Anne	Wright	Durham	NC	27705
Raven	Lefebvre	Durham	NC	27705
Erline	Williams	Durham	NC	27703
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Eugene	Downs	Durham	NC	27701
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Sarah	Shaw	Durham	NC	27704
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Babbie	Williams	Durham	NC	27704
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Regina	Harrington	Durham	NC	27703
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Donald	Clark	Durham	NC	27704
Vincent	Brown	Durham	NC	27712
Gail	Truax	Hillsborough	NC	27278
Joan	Russell	Rougemont	NC	27572
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Jody	Haller	Frisco	NC	27936
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Cosetta	Mitchell	Fayetteville	NC	28301
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Thomas	Storrie	Chapel Hill	NC	27517
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Mary	Blythe	Chapel Hill	NC	27517
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Dawn	Longobardo	Pittsboro	NC	27312
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Judy	Ingold	Hickory	NC	28601
Ruth	Featherstone	Hickory	NC	28601
Michael	Brown	Yanceyville	NC	27379

Susan	Suggs	Beaufort	NC	28516
		Pine Knoll		
John	Clarke	Shores	NC	28512
Margaret	Brown	Morehead City	NC	28557
Jacqueline	Glasgow	Morehead City	NC	28557
Mardi	Gruber	Lenoir	NC	28645
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Susan	Johnson	Concord	NC	28025
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Christina	Thronsohnhaus	Asheville	NC	28801
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Mark-Ellis	Bennett	Asheville	NC	28805
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Nancy	Branflick	Sunset Beach	NC	28468
Angela	Calabrese	Supply	NC	28462
Linda	Smith	Ocean Isle	NC	28469

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Deborah	Gassler	Carolina Shor	NC	28467
Francine	Fiorentino	Leland	NC	28451
Andrea	Gubey	Southport	NC	28461
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Denise	Karpy	Chocowinity	NC	27817
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Eva	McBride	Burlington	NC	27215
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Zane	Miller	Haw River	NC	27258
Kathy	MacLean	Haw River	NC	27258
Patricia	Parks	Burlington	NC	27217
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Nancy	Thorn	Graham	NC	27253
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Eric	Moore	Burlington	NC	27217
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Christina	Manning	Burlington	NC	27215
Jane	Brannock	Burlington	NC	27215



*Testimony of Suzanne Buckley, Executive Director, NARAL Pro-Choice North Carolina Foundation to the NC Department of Health & Human Services on December 19, 2014*

Thank you for the opportunity to testify today. My name is Suzanne Buckley and I am the Executive Director of NARAL Pro-Choice North Carolina Foundation. We are a statewide organization with over 33,000 member activists. We advocate for the 7 in 10 North Carolinians who believe reproductive health care decisions should be made by women and their doctors—not politicians. At NARAL, we put women’s health first, and we urge our elected representatives and this regulatory agency to do the same.

I am here today to talk about two key points: The law that required this Department to enact these regulations, and the regulations you have proposed in response. There is no question that Senate Bill 353, the law that forced these regulations to be created, was enacted by legislators with a single goal – to prevent women from accessing safe and legal abortion care in North Carolina. These types of laws, called TRAP laws, have been enacted in other states across the nation. The main effect of these laws has been that good, safe clinics were forced to shut their doors without providing any benefit to patient care or safety. If the Texas law goes into effect, close to a million women will be left without access to safe, legal and compassionate abortion care as half of the state’s clinics would be forced to close overnight.<sup>1</sup>

Abortion care is one of the safest types of medical care sought in this country. Further, thousands of men and women in North Carolina receive a wide range of critical reproductive health services from the clinics that will be impacted by these regulations, including family planning and preventative cancer screenings. NARAL Pro-Choice North Carolina Foundation welcomes oversight and regulations that protect patient safety, but there is simply no medical basis or need for the additional regulations required by this law.

Though the law that forced these regulations was clearly based on politics not medicine, we recognize that the Department of Health has engaged in a thoughtful, reasoned process in crafting the regulations we are here to discuss today. The Department of Health is “responsible for ensuring the health, safety and well being of all North Carolinians.”<sup>2</sup> In furtherance of that mission, the Department consulted with experts in the field of reproductive health care while drafting these regulations to ensure that they comport with the relevant medical standards and will appropriately protect the health and safety of North Carolina women, which includes ensuring access to essential health care. Although some of the specific requirements within the regulations are not related to providing safe abortion care, in general, these regulations reflect sound medicine and science.

There is no question that this Department will be under significant political pressure from those who oppose safe and legal abortion to regulate providers for political and ideological reasons, rather than based on the medical care they provide. For the sake of North Carolina women, who need access to the critical services these safe facilities provide, NARAL Pro-Choice North

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<sup>1</sup> Barnes, Robert. “Supreme Court blocks Texas abortion law.” *Washington Post*. 14 October 2014. 17 December 2014.

<sup>2</sup> NC Department of Health and Human Services, “The Mission of N.C. DHHS” <http://www.ncdhhs.gov/aboutdhhs/mission.htm>

Carolina Foundation and the thousands of women we represent urge the Department to adopt these regulations with only those changes necessary to ensure that they comport with medical standards recommended by legitimate experts in the field.

Thank you for your time.

# TAKE ACTION!

Tell the Department of Health & Human Services:  
Put Women's Health First

"I want to protect women's health and safety, and abortion care already is incredibly safe. The draft regulations proposed by the Department of Health and Human Services were written with extensive input from doctors, health care professionals and reproductive health experts, and they rely on evidence-based medicine. I urge the Department of Health and Human Services to continue to listen to medical experts and support sensible regulations that put women's health first. The reproductive health centers affected by these draft regulations serve thousands of NC women and families and offer a wide range of essential reproductive health services, including family planning, STD testing and treatment, life-saving cancer screenings and annual well-woman exams. The Department of Health and Human Services must put women's health and sound medical practices first when considering any changes to the draft regulations."

Name Graet Buckner

E-mail address \_\_\_\_\_

ZIP Code 28714

Additional Comments:

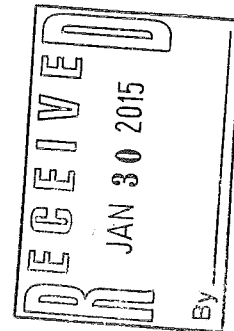
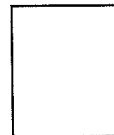
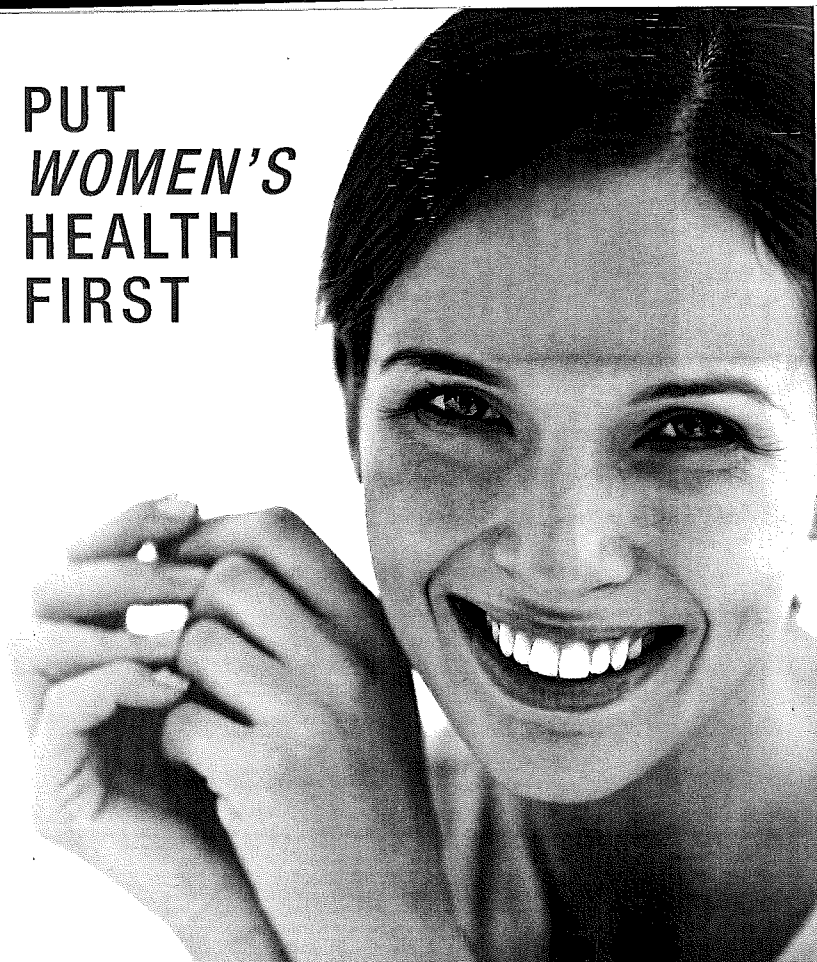
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Yes, I would like to receive updates from organizations supporting this comment:



Planned Parenthood Action Fund of North Carolina

PUT  
*WOMEN'S*  
HEALTH  
FIRST

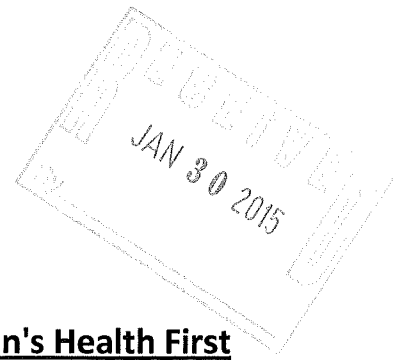


Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701





Planned Parenthood Health Systems  
Action Fund, Inc.



**Tell the Department of Health & Human Services: Put Women's Health First**

On December 1, 2014 the Department of Health and Human Services (DHHS) released a set of draft regulations that apply only to abortion providers in NC, in accordance with SB 353 (aka the Motorcycle Abortion Bill) which lawmakers passed in 2013. Regulations like these--generally known as targeted regulation of abortion providers or TRAP law--are a commonplace legislative tactic designed to force women's health centers that offer abortion care to close their doors by imposing burdensome and medically unnecessary requirements. We believe it's critical that the same political interests that forced these rules to be written in the first place not compromise the rule-making process. **Join us in submitting a public comment and tell the Department of Health to continue listening to reproductive health care experts and put women's health first!**

I want to protect women's health and safety, and abortion care already is incredibly safe. The draft regulations proposed by the Department of Health and Human Services were written with extensive input from doctors, health care professionals and reproductive health experts, and they rely on evidence-based medicine. I urge the Department of Health and Human Services to continue to listen to medical experts and to support sensible regulations that put women's health first. The reproductive health centers affected by these draft regulations serve thousands of NC women and families and offer a wide range of essential reproductive health services, including family planning, cancer screenings and annual check-ups for reproductive health. The Department of Health and Human Services must put women's health and sound medical practices first when considering any changes to the draft regulations.

FIRST NAME:

*Penny*

LAST NAME:

*Budner*

EMAIL:

*\_\_\_\_\_*

ZIP:

*28753*

*Optional Comment field:*

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Mauney Buchanan  
E-mail address mauney88@gmail.com  
ZIP Code 27703

Additional Comments:

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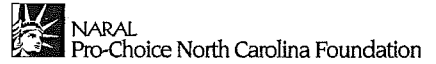
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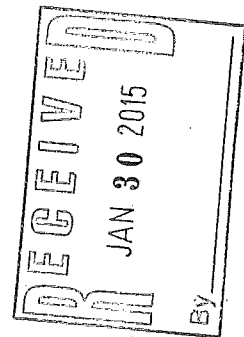
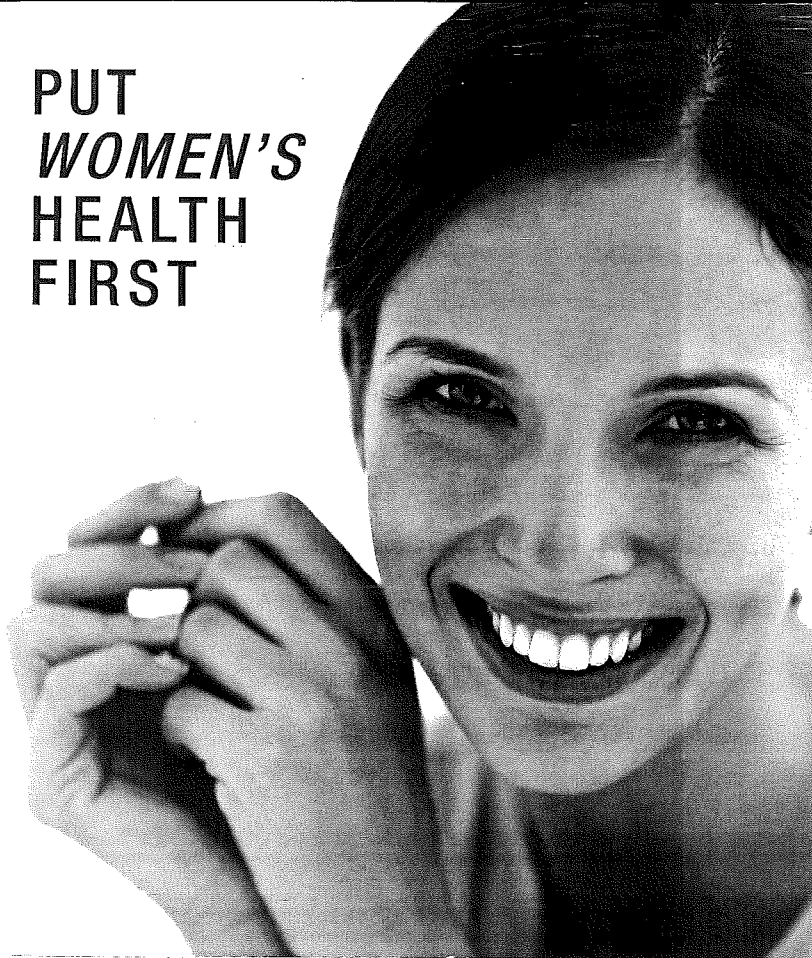
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Planned Parenthood Action Fund of North Carolina

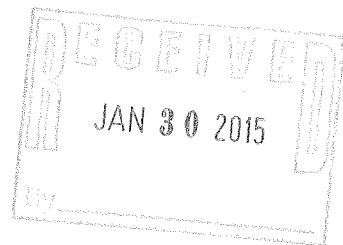
PUT  
*WOMEN'S*  
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FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



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FIRST NAME:

LAST NAME:

Charlotte Buell

EMAIL:

ZIP:

charlottebue1@aol.com 28217

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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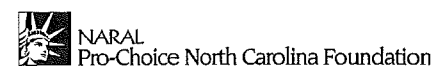
Name Stan Bukows

E-mail address \_\_\_\_\_

ZIP Code 27707

Additional Comments:  
I BELIEVE  
THAT A WOMAN'S  
RIGHT TO HEALTH  
REPRODUCTIVE  
RIGHTS ARE  
MUST REMAIN  
CONSTITUTIONAL

Yes, I would like to receive updates from organizations supporting this comment:



Planned Parenthood Action Fund of North Carolina

# TAKE ACTION!

Tell the Department of Health & Human Services:  
Put Women's Health First

"I want to protect women's health and safety, and abortion care already is incredibly safe. The draft regulations proposed by the Department of Health and Human Services were written with extensive input from doctors, health care professionals and reproductive health experts, and they rely on evidence-based medicine. I urge the Department of Health and Human Services to continue to listen to medical experts and support sensible regulations that put women's health first. The reproductive health centers affected by these draft regulations serve thousands of NC women and families and offer a wide range of essential reproductive health services, including family planning, STD testing and treatment, life-saving cancer screenings and annual well-woman exams. The Department of Health and Human Services must put women's health and sound medical practices first when considering any changes to the draft regulations."

Name Charles Burnham  
E-mail address Charles\_burnham@msn.com  
ZIP Code 27278

Additional Comments:

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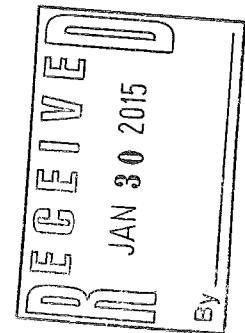
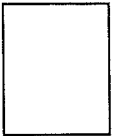
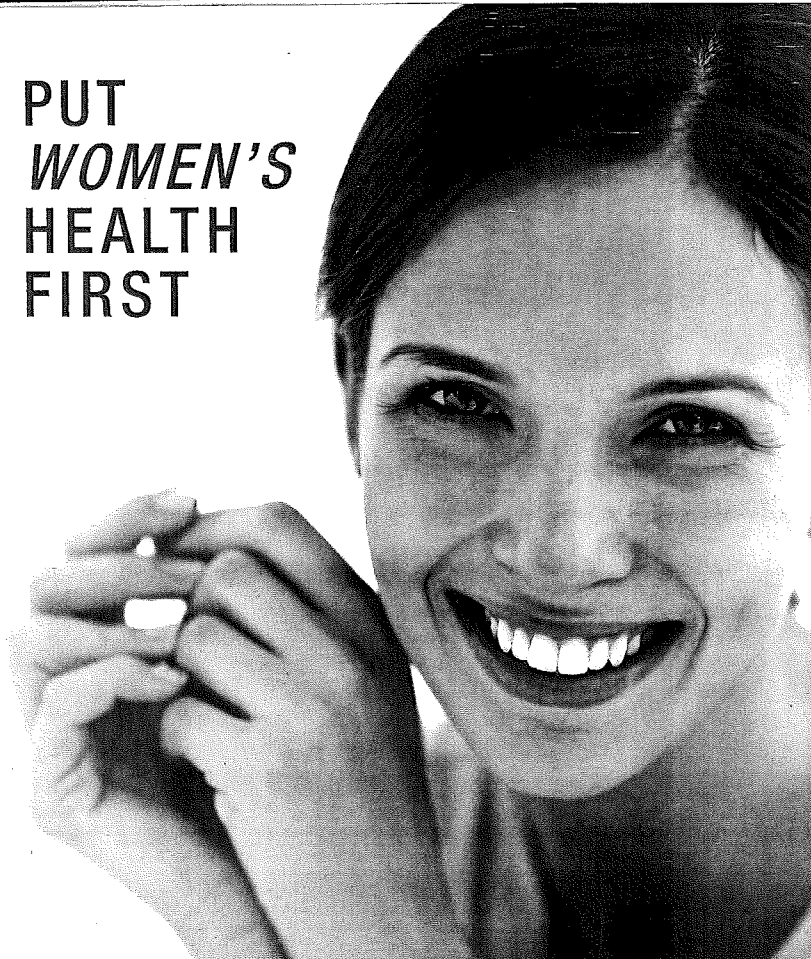
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Yes, I would like to receive updates from organizations supporting this comment:



Planned Parenthood Action Fund of North Carolina

PUT  
WOMEN'S  
HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

# TAKE ACTION!

Tell the Department of Health & Human Services:  
Put Women's Health First

"I want to protect women's health and safety, and abortion care already is incredibly safe. The draft regulations proposed by the Department of Health and Human Services were written with extensive input from doctors, health care professionals and reproductive health experts, and they rely on evidence-based medicine. I urge the Department of Health and Human Services to continue to listen to medical experts and support sensible regulations that put women's health first. The reproductive health centers affected by these draft regulations serve thousands of NC women and families and offer a wide range of essential reproductive health services, including family planning, STD testing and treatment, life-saving cancer screenings and annual well-woman exams. The Department of Health and Human Services must put women's health and sound medical practices first when considering any changes to the draft regulations."

Name Kathryn Bundy  
E-mail address kjebundy@gmail.com  
ZIP Code 27616

Additional Comments:

Women - esp. young  
& poor women + students -  
need easy access to  
affordable & high  
level care for their female  
specific health needs. Prevention  
is much better than coming  
behind to treat problems!

Yes, I would like to receive updates from organizations supporting this comment:

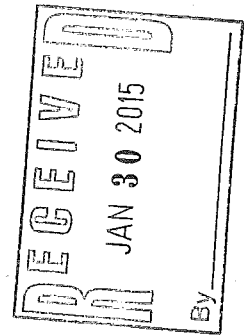
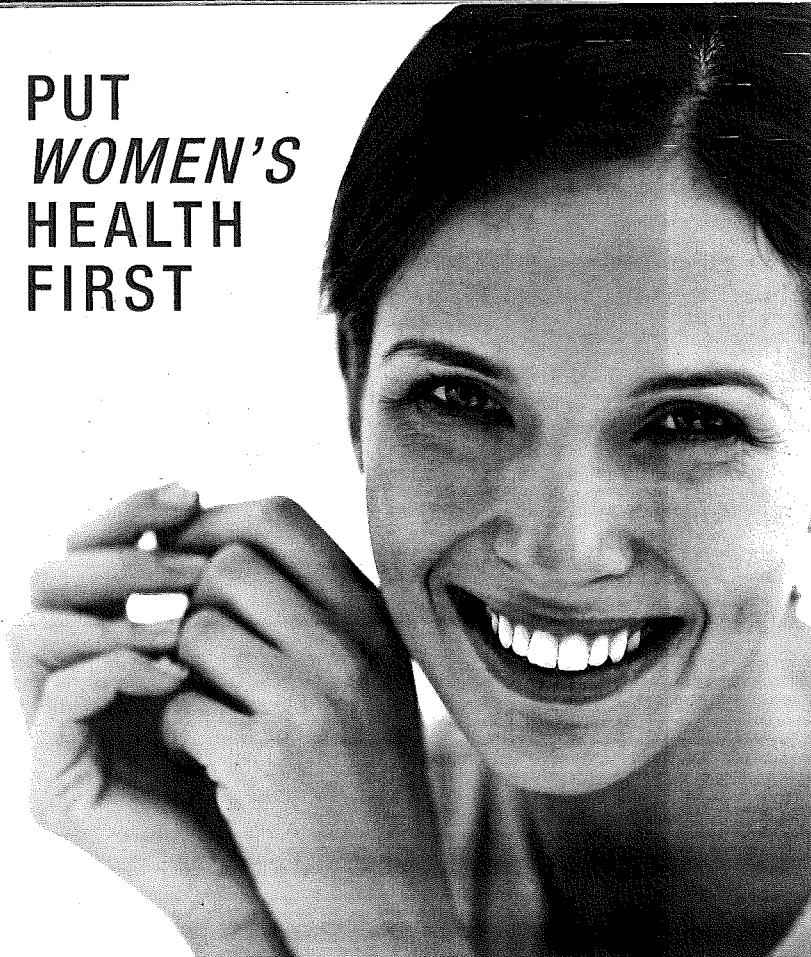


NARAL  
Pro-Choice North Carolina Foundation

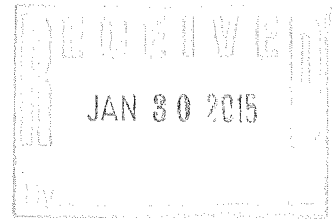


Planned Parenthood Action Fund of North Carolina

PUT  
**WOMEN'S  
HEALTH  
FIRST**



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



Planned Parenthood Health Systems  
Action Fund, Inc.

**Tell the Department of Health & Human Services: Put Women's Health First**

On December 1, 2014 the Department of Health and Human Services (DHHS) released a set of draft regulations that apply only to abortion providers in NC, in accordance with SB 353 (aka the Motorcycle Abortion Bill) which lawmakers passed in 2013. Regulations like these--generally known as targeted regulation of abortion providers or TRAP law--are a commonplace legislative tactic designed to force women's health centers that offer abortion care to close their doors by imposing burdensome and medically unnecessary requirements. We believe it's critical that the same political interests that forced these rules to be written in the first place not compromise the rule-making process. **Join us in submitting a public comment and tell the Department of Health to continue listening to reproductive health care experts and put women's health first!**

I want to protect women's health and safety, and abortion care already is incredibly safe. The draft regulations proposed by the Department of Health and Human Services were written with extensive input from doctors, health care professionals and reproductive health experts, and they rely on evidence-based medicine. I urge the Department of Health and Human Services to continue to listen to medical experts and to support sensible regulations that put women's health first. The reproductive health centers affected by these draft regulations serve thousands of NC women and families and offer a wide range of essential reproductive health services, including family planning, cancer screenings and annual check-ups for reproductive health. The Department of Health and Human Services must put women's health and sound medical practices first when considering any changes to the draft regulations.

FIRST NAME:

LAST NAME:

Loraine Burger →

EMAIL:

ZIP:

lcbloomer@aol.com

27713

*Optional Comment field:*

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



SUBMITTED ELECTRONICALLY

January 30, 2015

Denise M. Burke, Esq.  
Vice President of Legal Affairs  
Americans United for Life  
655 15<sup>th</sup> Street, NW, Suite 410  
Washington, DC 20005

Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

RE: Proposed amendments and adoptions of rules in Chapter 10A  
NCAC 14E *Certifications of Clinics for Abortion*

Dear Ms. Pfeiffer:

Under Session Law 2013-366 s.4(c), Part IV. Amend *Women's Right to Know Act*, the North Carolina Department of Health and Human Services<sup>1</sup> was authorized to amend rules governing abortion clinics certified by the Department (under G.S. 14-45.1) as suitable for the performance of abortions. Specifically, the Department was authorized to apply any requirement for the licensure of ambulatory surgical centers to the standards applicable to abortion facilities. Public comment has been solicited on the proposed abortion facility regulations.

For more than a decade, Americans United for Life (AUL) has been recognized as a leading authority on comprehensive and medically appropriate regulation and oversight of abortion facilities. Our expertise includes drafting model legislation encompassing medically appropriate health and safety standards for abortion facilities, participating in administrative rule-making proceedings, and defending abortion facility regulations that are challenged in federal and state courts. I have thoroughly reviewed the proposed North Carolina regulations and specifically

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<sup>1</sup> Hereinafter, referred to as the "Department."



compared them to nationally recognized standards for ambulatory surgical centers, regulatory schemes in other states, and to abortion facility regulations that have been approved by both state administrative authorities and the courts. Based on that review, I offer the following comments on the need for and appropriateness of health and safety standards for abortion facilities and identify four major deficiencies in the proposed North Carolina rules.

## **I. Need for and Appropriateness of Health and Safety Standards for Abortion Facilities**

*Health and safety standards for abortion facilities are necessary for the protection of public health and safety.*

Health and safety standards for abortion facilities are necessary for the protection of public health and safety for several reasons, including (a) abortion is an invasive surgical procedure that can lead to numerous and serious medical complications; and (b) even conservative estimates of abortion complication rates support the need for such standards.

### **(a) Abortion is an invasive surgical procedure that can lead to numerous and serious medical complications.**

Potential complications for first-trimester abortions include, among others, bleeding, hemorrhage, infection, uterine perforation, blood clots, cervical tears, incomplete abortion (retained tissue), failure to actually terminate the pregnancy, free fluid in the abdomen, acute abdomen, missed ectopic pregnancies, cardiac arrest, sepsis, respiratory arrest, reactions to anesthesia, fertility problems, emotional problems, and even death.<sup>2</sup>

Moreover, the risks for second-trimester abortions are greater than for first-trimester abortions. The risk of hemorrhage, in particular, is greater, and the resultant complications may require a hysterectomy, other reparative surgery, or blood transfusions.<sup>3</sup>

As the author of a leading abortion textbook writes, “[T]here are few surgical procedures given so little attention and so underrated in its potential hazard as abortion.”<sup>4</sup>

### **(b) Published abortion complication rates support the need for clinic standards.**

Relying on the abortion industry’s own conservative estimates of complication rates along with the pro-abortion Guttmacher Institute’s latest report on induced abortions, in 2011 alone, more

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<sup>2</sup> Information on abortion complications is drawn from depositions, responses to interrogatories, and other discovery in *Tucson Woman’s Clinic v. Eden*, No. CIV 00-141-TUC-RCC (D. Ariz. Oct. 1, 2002).

<sup>3</sup> *See id.*

<sup>4</sup> Warren M. Hern, *Abortion Practice* 101 (1990).

than 26,000 women experienced abortion-related complications, and more than 3,000 of these women required hospitalization.<sup>5</sup> These numbers are not insignificant. Instead, they attest to a significant public health concern.

### ***Current State Regulation of Abortion Facilities***

Currently, 28 states regulate (to varying degrees) facilities providing abortions:

- Four states mandate that facilities performing abortions meet ambulatory/outpatient surgical center standards: Alabama, Missouri, Pennsylvania, and Virginia.
- Twenty states maintain varying degrees of regulations that apply to facilities performing abortions: Arizona, Arkansas, Connecticut, Georgia, Illinois, Indiana, Kentucky, Louisiana, Maryland, Michigan, Mississippi, Nebraska, North Carolina (pre-2013 law), Ohio, Oklahoma, Rhode Island, South Carolina, South Dakota, Texas (pre-2013 law), and Wisconsin.
- Four states regulate facilities performing post-first trimester abortions: Florida, Minnesota, New Jersey, and Utah.
- Abortion facility regulations from Kansas and Texas (ambulatory surgical center standards enacted in 2013) are enjoined pending the outcome of litigation.

### ***Overwhelming Legal Precedent Supports Abortion Facility Regulations***

The U.S. Supreme Court and other courts have repeatedly recognized and supported the need for abortion facility regulations. Since *Roe v. Wade*, the U.S. Supreme Court has repeatedly acknowledged that a state has “a legitimate interest in seeing to it that abortion, like any other medical procedure, is performed under circumstances that ensure maximum safety for the patient.”<sup>6</sup>

Specifically, in *Roe*, the Supreme Court found that the State’s legitimate interest in regulating abortion to protect maternal health, “obviously extends at least to [regulating] the performing

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<sup>5</sup> See “Induced Abortion in the United States,” dated February 2014, available at [http://www.guttmacher.org/pubs/fb\\_induced\\_abortion.html](http://www.guttmacher.org/pubs/fb_induced_abortion.html) (last visited Jan. 27, 2015). Guttmacher reported 1.06 million abortions in 2011. Abortion advocates routinely claim that 2.5% of women who have a first-trimester abortion “undergo minor complications,” and that “fewer than 0.3%” experience a complication requiring hospitalization. See, e.g., *Planned Parenthood v. Abbott*, No. 13-51008 at \*8 (5th Cir. Mar. 28, 2014), available at <http://www.ca5.uscourts.gov/opinions%5Cpub%5C13/13-51008-CV1.pdf> (last visited Jan. 25, 2015). Using these figures for base-line calculations, we can estimate that, in 2011 alone, 26,500 women experienced complications and approximately 3180 women required post-abortion hospitalization.

<sup>6</sup> *Roe v. Wade*, 410 U.S. 113, 150 (1973); see also, *Planned Parenthood of Southeastern Penn. v. Casey*, 505 U.S. 833, 847 (1992).

physician and his staff, to the facilities involved, to the availability of after-care, and to adequate provision for any complication or emergency that may arise.”<sup>7</sup>

Abortion facility regulations protect women and do not impose an “undue burden.” Federal courts have repeatedly and summarily rejected the argument that abortion facility regulations impose an “undue burden” on women seeking abortions by increasing the cost of abortions or by decreasing the number of providers.<sup>8</sup> The abortion right has been specifically defined by the U.S. Supreme Court as “the right of the woman herself,”<sup>9</sup> not as the “right” of abortion providers to practice without appropriate regulation or oversight, to realize a profit, or to charge a certain fee for their services.

For these reasons and others, comprehensive abortion facility regulations have repeatedly withstood legal challenges from abortion providers.

## **II. Deficiencies in the Proposed North Carolina Rules**

My review of the proposed North Carolina rules suggests that they are deficient in at least four major areas: (a) in formulating appropriate standards of care for abortion patients, the Department failed to consult the Joint Commission Standards for Ambulatory Care; (b) the Department is effectively delegating its regulatory and oversight authority to individual abortion facilities and has failed to adequately protect North Carolina women by mandating comprehensive, medically appropriate standards for such facilities; (c) the proposed rules do not provide for proper enforcement, failing to prescribe criminal and/or civil penalties for violations; and (d) the proposed rules do not adequately define important terms, rendering the rules suspect and subject to varying interpretations.

### ***Department Failed to Consult Joint Commission Standards for Ambulatory Care***

The Joint Commission is an independent, not-for-profit organization that accredits and certifies more than 20,500 healthcare organizations and programs in the United States. Joint Commission accreditation and certification is recognized nationwide as a symbol of quality that reflects an organization’s commitment to meeting high performance standards.<sup>10</sup> The Joint Commission has promulgated medically appropriate standards for ambulatory surgical care:

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<sup>7</sup> Roe, 410 U.S. at 150.

<sup>8</sup> *Greenville Women’s Clinic v. Bryant*, 222 F.3d 157, 172-175 (4<sup>th</sup> Cir. 2000), *cert denied*, 531 U.S. 1191 (2001); *Women’s Medical Center of Northwest Houston v. Bell*, 248 F.3d 411 (5<sup>th</sup> Cir. 2001); *Bristol Reg’l Women’s Ctr., P.C. v. Tenn. Dep’t of Health*, No. 3:99-0465 (D. Tenn. Oct. 22, 2001).

<sup>9</sup> *Casey*, 505 U.S. at 833, 877 (1992) (joint opinion of O’Connor, Kennedy, and Souter, JJ.).

<sup>10</sup> See generally, “About the Joint Commission,” available at [http://www.jointcommission.org/about\\_us/about\\_the\\_joint\\_commission\\_main.aspx](http://www.jointcommission.org/about_us/about_the_joint_commission_main.aspx) (last visited Jan. 27, 2015).

*Joint Commission Standards for Ambulatory Care* (sometimes referred to as the “JCAHO standards”).<sup>11</sup> A summary of those standards is provided herein.<sup>12</sup>

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<sup>11</sup> More information about the Joint Commission and its standards for ambulatory care can be found at [http://www.jointcommission.org/accreditation/ambulatory\\_healthcare.aspx](http://www.jointcommission.org/accreditation/ambulatory_healthcare.aspx) (last visited Jan. 27, 2015).

<sup>12</sup> The Joint Commission standards provide:

**I. Environment of Care**

**Goal:** Promote a safe, functional, and supportive environment within the facility to ensure that quality and safety are preserved.

**Elements:**

1. Building or space
  - a. Arrangement of building or space
  - b. Special features that protect patients, visitors and staff
2. Equipment
  - a. That used to support patient care
  - b. That used to facilitate safe operation of the building or space
3. Staff's role in minimizing and managing safety risks

**Prescribes standards for:**

1. Safety and Security
2. Hazardous Material and Waste
3. Fire Safety
4. Medical Equipment – inspection, testing and maintenance
5. Utilities – including emergency power

**II. Emergency Management**

**Goal:** Allow organizations to respond to the effects of potential emergencies that fall on the continuum from disruptive to disastrous.

**Elements:** Activities that must be done to put together a comprehensive Emergency Management Plan (EMP). Covers four phases: mitigation, preparedness, response, and recovery.

**Prescribes Standards for:**

The preparation and execution of the EMP including how it will manage the following areas during an emergency:

1. Communications
2. Resources and Assets
3. Security and Safety
4. Staff
5. Utilities
6. Patients
7. Disaster Volunteers

**III. Human Resources**

**Goal:** Provide for procedures to establish and verify staff qualifications, to orient staff, and to provide staff with training needed to support, care, treatment, or services the organization provides.

**Elements:** Standards for both staff and licensed independent practitioners

**Prescribes Standards for:**

1. Staff
  - a. Staff qualifications
  - b. Staff orientation procedures
  - c. Ongoing education and training
  - d. Ensuring competence to perform assigned duties
  - e. Evaluations
2. Licensed Independent Practitioners
  - a. Granting of privileges to provide medical care
  - b. Orientation

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#### IV. Infection Management and Control

**Goal:** Reduce the possibility of acquiring and transmitting an infection through systematic infection prevention and control

**Elements:** Development and implementation of appropriate infection control standards.

**Prescribes Standards for:**

1. Planning
  - a. Identify team or person responsible
  - b. Allocate resources for infection prevention and control activities
  - c. Identify risks for acquiring and transmitting infections
  - d. Set goals to minimize risks
  - e. Develop plans for preventing and controlling infections
2. Implement plan(s)
  - a. Reduce risks associated with medical equipment, devices or supplies
  - b. Reduce of transmission by and between patients and/or staff
3. Periodic evaluation

#### V. Information Management

**Goals:** System that accurately captures health information generated by the delivery of care, treatment, or services. Information is used to provide quality care.

**Elements:** Systems to categorize, file, and maintain health information.

**Prescribes Standards for:**

1. Planning how to manage information
2. Protecting the privacy of information
3. Maintaining the security and integrity of information
4. Capturing, storing, and retrieving information
5. Current knowledge-based information resources

#### VI. Leadership

**Goals:** Leadership and organizational culture that fosters

1. Safety as a priority
2. Planning and provision of services that meet the needs of patients
3. Availability of human, financial, and physical resources for providing care, treatment, and services
4. Competent staff and other care providers
5. Ongoing evaluation and improvement in performance

**Elements:** Role of leaders in managing these responsibilities and ensuring regular and proactive risk assessments

**Prescribes Standards for:**

1. Leadership Structure
  - a. Governance accountabilities
  - b. Chief Executive responsibilities
  - c. Leaders' knowledge
2. Leadership Relationships
  - a. Mission, vision, and goals
  - b. Communication among leaders
3. Organization Culture and System Performance Expectations
  - a. Culture of safety and quality
  - b. Using data and information
  - c. Organization-wide planning
  - d. Communications
  - e. Change management and performance improvement
  - f. Staffing
4. Operations
  - a. Administration
  - b. Ethical issues
  - c. Meeting patient needs
  - d. Managing quality and safety through the use of clinical practice guidelines

- 
5. Oversight of Care, Treatment or Services Provided Through Contractual Agreements
    - a. Monitoring contractual services
    - b. Granting privileges to provide patient care, treatment, or services

**VII. Life Safety**

**Goals:** Proper implementation of National Fire Protection Agency's (NFPA) *Life Safety Code*®

**Elements:**

1. Facility design and building construction
2. Means of egress including design, travel distance, illumination, and signage
3. Protection provided by door features, fire windows, stairs and other vertical openings, corridors, smoke barriers, and interior finishes
4. Fire alarm notification
5. Suppression features such as sprinkler systems
6. Building services including elevators and parachutes
7. Decorations, furnishings, and portable heaters

**Prescribes Standards for:**

1. General building requirements to minimize the effects of fire, smoke, and heat
2. Maintaining integrity of means of egress
3. Protection elements including
  - a. Vertical openings
  - b. Door assemblies
  - c. Fire windows
  - d. Corridors
  - e. Smoke barriers
  - f. Fire alarms
  - g. Equipment to extinguish fires
4. Special Provisions (for windowless buildings and high rise buildings)
5. Building Services
6. Operating Features

**VIII. Medication Management**

**Goals:** To improve the quality of care and eliminate any potential harm that could be caused by medications

**Elements:** A medication management system addressing

1. Planning
2. Selection and procurement
3. Storage
4. Ordering
5. Preparing and dispensing
6. Administration
7. Monitoring
8. Evaluation

**Prescribes standards for:**

1. Planning medication management process
2. Safely managing high-alert and hazardous medications
3. Addressing the safe use of look-alike/sound-alike medications
4. Selecting and procuring medications
5. Safely storing medications
6. Safely managing any emergency medications
7. Safely controlling any medications brought into the organization by patients, their families, or licensed independent practitioners
8. Issuing clear and accurate medication orders
9. Reviewing the appropriateness of all medication orders
10. Safely preparing medications
11. Labeling medications
12. Safely dispensing medications
13. Safely obtaining medications
14. Following a process to retrieve and manage recalled or discontinued medications

- 
15. Safely administering medications
  16. Safely managing investigational medications
  17. Monitoring patients to determine the effects of their medications
  18. Responding to actual or potential adverse drug events, significant adverse drug reactions, and medication errors
  19. Evaluating the effectiveness of its medication management system

**IX. National Patient Safety Goals**

**Goals/Elements/Prescribes Standards for:**

1. Improve the accuracy of patient identification
2. Improve the effectiveness of communication among caregivers
3. Improve the safety of using medications
4. Reduce the risk of health care-associated infections
5. Accurately and completely reconcile medications across the continuum of care
6. Reduce the risk of patient harm resulting from falls
7. The organization identifies safety risks inherent in its patient population

**X. Provision of Care, Treatment and Services**

**Goals:** Permit care to be delivered according to patient needs and the organization's scope of services:

1. Providing access to levels of care and/or disciplines necessary to meet the patient's needs
2. Interventions based on the plan of care, including the education or instruction of patients regarding their care, treatment, or services
3. Coordinating care to promote continuity when patients are referred, discharged, or transferred

**Elements:**

1. Assessing patient needs
2. Planning care, treatment, or services
3. Providing care, treatment, or services
4. Coordinating care, treatment, or services

**Prescribes standards for:**

1. Accepting the patient for care, treatment, or services
2. Assessing and reassessing the patient
3. Planning the patient's care
4. Providing the patient with care, treatment, or services
5. Coordinating the patient's care, treatment, or services
6. Providing the patient with education
7. Planning the patient's operative or other high-risk procedures, including those that require the administration of moderate or deep sedation
8. Caring for the patient who requires the use of restraint for non-behavioral health purposes
9. Caring for the patient who requires the use of restraint or seclusion for behavioral health purposes
10. Meeting the patient's needs for continuing care, treatment, or services after discharge or transfer

**XI. Performance Improvement**

**Goals:** Improve patient care by measuring the performance of the processes that support care and using that data to make improvements

**Elements/Prescribes Standards for:**

1. Data collection
2. Data analysis
3. Performance improvement

**XII. Record of Care, Treatment, and Services**

**Goals:** Ensure complete and accurate clinical record for patient care

**Elements/Prescribes Standards for:**

Importantly, women undergoing abortions deserve the high standard of care mandated by the JCAHO standards. Indeed, this rigorous standard of care has been mandated for many other surgical procedures and in many other medical contexts. For example, the federal government requires that ambulatory surgical centers providing care to patients under Medicare meet similarly high standards for patient care and facility safety.<sup>13</sup> For these reason, I recommend that the Department review and incorporate JCAHO standards into the proposed North Carolina rules.

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1. Clinical record components and what entries must be made (to reflect the entirety of the patient’s care, treatment, or services)
  2. Authentication of entries
  3. Timely entry of documentation into the clinical record
  4. Verbal orders
  5. Audit
  6. Standards for record retention

**XIII. Rights and Responsibilities of Individuals**

**Goals:** To improve care and empower patients, their rights must be recognized and respected

**Elements:**

1. Informing patients of their rights
2. Helping patients understand and recognize their rights
3. Respecting patients’ values, beliefs, and preferences
4. Informing patients of their responsibilities regarding their care, treatment, or services

**Prescribes Standards for:**

1. Identification of fundamental, overarching patient rights
2. The right to effective communication including receiving information in a way the patient understands
3. The right to participate in care decisions
4. The right to informed consent
5. The right to know care providers
6. Individual rights of patients
  - a. Right to be free from neglect; exploitation; and verbal, mental, physical, and sexual abuse
  - b. Right to have complaints reviewed by the organization
7. Patient responsibilities

**XIV. Waived Testing**

**Goals:** Provide standards related to “waived testing “(testing that has an “insignificant risk” of erroneous results under Clinical Laboratory Improvement Amendments of 1988).

**Elements/Prescribes Standards for:**

1. Policies and procedures
2. Identification of staff performing and supervising waived testing
3. Competency of staff performing waived testing
4. Performance of quality control checks
5. Recordkeeping

<sup>13</sup> See 42 C.F.R. 416 *et seq.*



***Department Has Inappropriately Delegated Its Regulatory and Oversight Authority to Individual Abortion Facilities***

Throughout the proposed North Carolina rules, the abortion facility or its “governing authority” is directed to establish a variety of programs, plans, policies, and procedures, some of which the rules appear to require be in writing and some which they do not. For example, 10A NCAC 14E (dealing with Quality Assurance) provides

- (a) The governing authority shall establish a quality assurance program for the purpose of providing standards of care for the facility. The program shall include the establishment of a committee which shall evaluate:
  - (1) Appropriateness and necessity of surgical procedures performed, and
  - (2) Compliance with facility procedure and policies.

Further, 10A NCAC 14E .0303 directs the “governing authority” to prepare a “manual of clinic policies.”

In most instances, the proposed North Carolina rules do not give sufficient guidance as to what these policies and procedures must (at minimum) contain to ensure the protection of maternal health and to bring the abortion facility into proper compliance with the Department’s regulations and administrative rules. Instead, significant discretion is left with each individual abortion facility. While some degree of discretion is likely appropriate, the proposed North Carolina rules vest too much discretion in the individual abortion facilities, failing to guarantee consistent and quality care at abortion facilities statewide and to provide the abortion facilities with adequate notice of their legal duties and responsibilities under the proposed rules.

The Department should endeavor to amend the proposed rules to further clarify the minimum requirements for these programs, plans, policies, and procedures which range from “patient selection and exclusion criteria” and patient admission to the performance of abortion procedures and patient discharge.

***Proposed North Carolina Rules Do Not Include Adequate Enforcement Mechanisms***

One of the most important lessons learned from the criminal case against Kermit Gosnell and the substandard and dangerous care provided at his West Philadelphia abortion “house of horrors” was the need to appropriately and consistently enforce state abortion laws – all federal and state abortion-related laws. Protective laws and administrative rules do no good if they are simply on the books, but are not properly enforced.

During its exhaustive review of the evidence against Kermit Gosnell, the grand jury found fault with repeated failures “to enforce laws that should afford patients at abortion clinics the same safeguards and assurances of quality health care as patients of other medical service providers,” specifically noting that even nail salons were “monitored more closely” than abortion clinics. As the Gosnell grand jury concluded, to prevent future abortion tragedies, state officials “must find the fortitude to enact and enforce the necessary regulations. Rules must be more than words on paper.”<sup>14</sup>

The proposed North Carolina rules are clearly deficient in this regard. ***No civil or criminal penalties are prescribed for violations of the rules.*** Appropriate penalties and remedies for violations are essential. For example, adequate administrative remedies would necessarily include the ability of the Department to suspend, revoke, or take other appropriate adverse action against an abortion facility or its certification (or license) when the facility is found not to be in compliance with the proposed rules or any other applicable federal or state law, regulation, or administrative rule.

I recommend that the proposed North Carolina rules be amended to include appropriate civil and/or criminal penalties or remedies for violations and to permit Department inspectors and investigators to adequately ensure compliance with all federal and state laws, regulations, and administrative rules applicable to abortion facilities.

### **Terms Used in the Proposed Rules Are Not Appropriately Defined**

First, as these proposed rules specifically deal with the performance of abortions, an appropriate definition for “**abortion**” is essential. Any definition included in the proposed rules must make clear whether the proposed rules apply to surgical and/or nonsurgical (*i.e.*, chemical) abortions.

The definition for “**complication**” is inadequate and incomplete. I recommend a more comprehensive definition such as

“Complication” means any adverse physical or psychological condition arising from the performance of an abortion, which includes but is not limited to: uterine perforation, cervical perforation, infection, bleeding, hemorrhage, blood clots, failure to actually terminate the pregnancy, incomplete abortion (retained tissue), pelvic inflammatory disease, endometritis, missed ectopic pregnancy, cardiac arrest, respiratory arrest, renal failure, metabolic disorder, shock, embolism, coma, free fluid in the abdomen,

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<sup>14</sup> See Report of the Grand Jury, MISC. NO. 0009901-2008 (Jan. 11, 2011), *available at* <http://www.phila.gov/districtattorney/PDFs/GrandJuryWomensMedical.pdf> (last visited Jan. 27, 2015).

adverse reactions to anesthesia and other drugs, and any other “adverse event” as defined by the Food and Drug Administration (FDA) criteria provided in the Medwatch Reporting System.

Finally, other significant terms used in the proposed regulations such as “**physician**” or “**ancillary nursing personnel**” must be adequately defined to ensure that abortion facilities subject to the proposed rules know what the rules require, what they proscribe, and what their legal obligations are under the rules. Failure to adequately define terms renders the proposed rules legally suspect and susceptible to arbitrary enforcement.

### **III. Conclusion**

Medically appropriate health and safety standards for abortion facilities are clearly necessary for the protection of maternal health. AUL, therefore, urges the Department (1) to consult additional medical authorities, specifically the JCAHO standards; (2) to avoid delegating its proper regulatory and supervisory authority to individual abortion facilities; (3) to include provisions ensuring that any final regulations are properly and consistently enforced; and (4) to adequately and properly define terms. Failure to do so will leave North Carolina women vulnerable to dangerous abortion facilities and substandard care.

If you have any questions or if I can be of any further assistance, please feel free to contact me at (202) 683-6107 or [denise.burke@AUL.org](mailto:denise.burke@AUL.org).

Sincerely,



Denise M. Burke, Esq.

Vice President of Legal Affairs

# TAKE ACTION!

Tell the Department of Health & Human Services:  
Put Women's Health First

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Name Vernon Burkhardt  
E-mail address VERNON - BURKHART@VIDEO  
ZIP Code 27610

Additional Comments:

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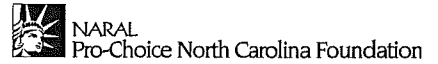
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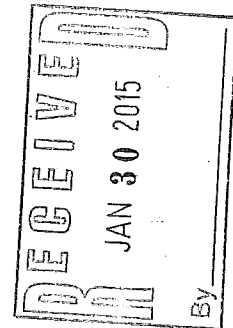
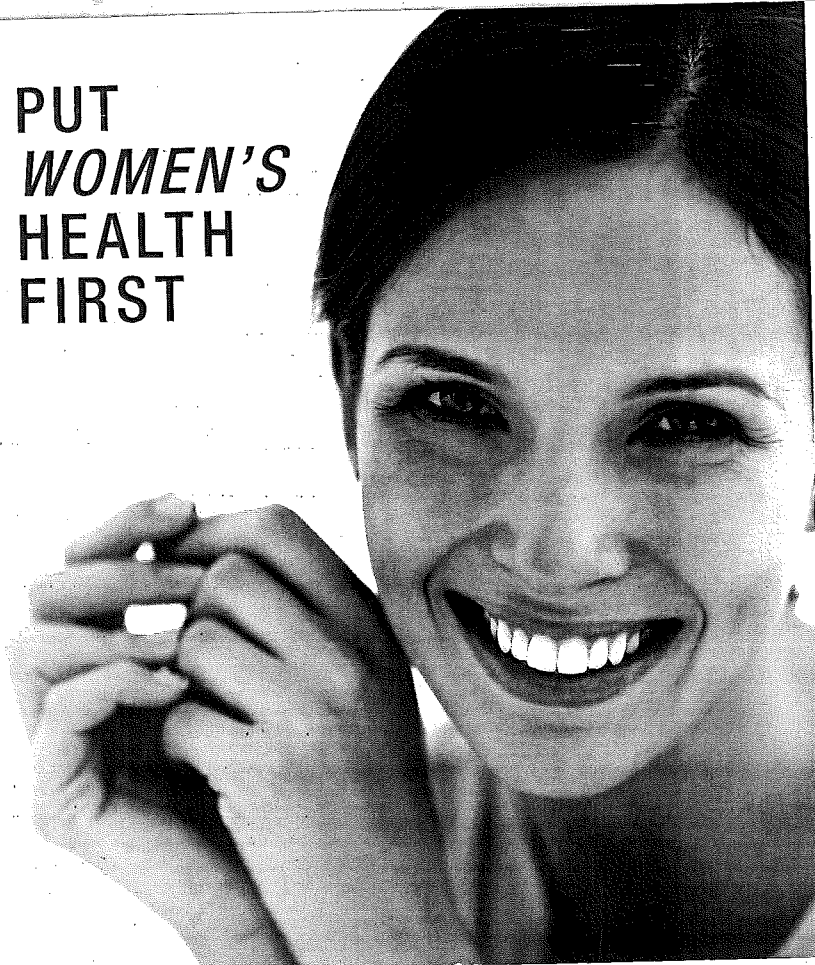
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Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Amy Burkert

E-mail address \_\_\_\_\_

ZIP Code 53080

Additional Comments:

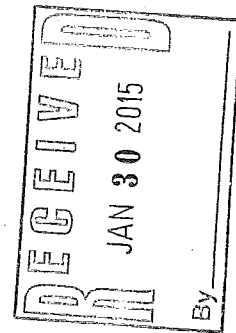
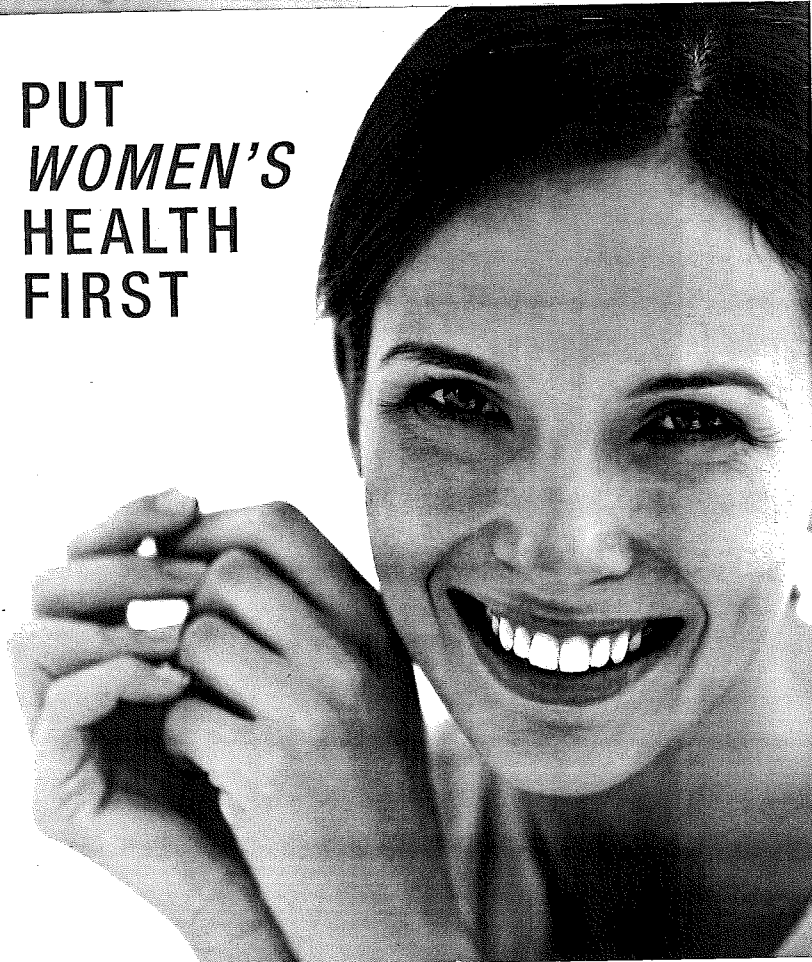
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Name Nancy Shaw Burns  
E-mail address Nancyburns33@gmail.com  
ZIP Code 28804

Additional Comments:

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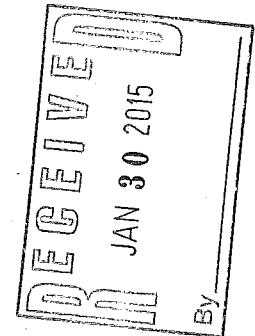
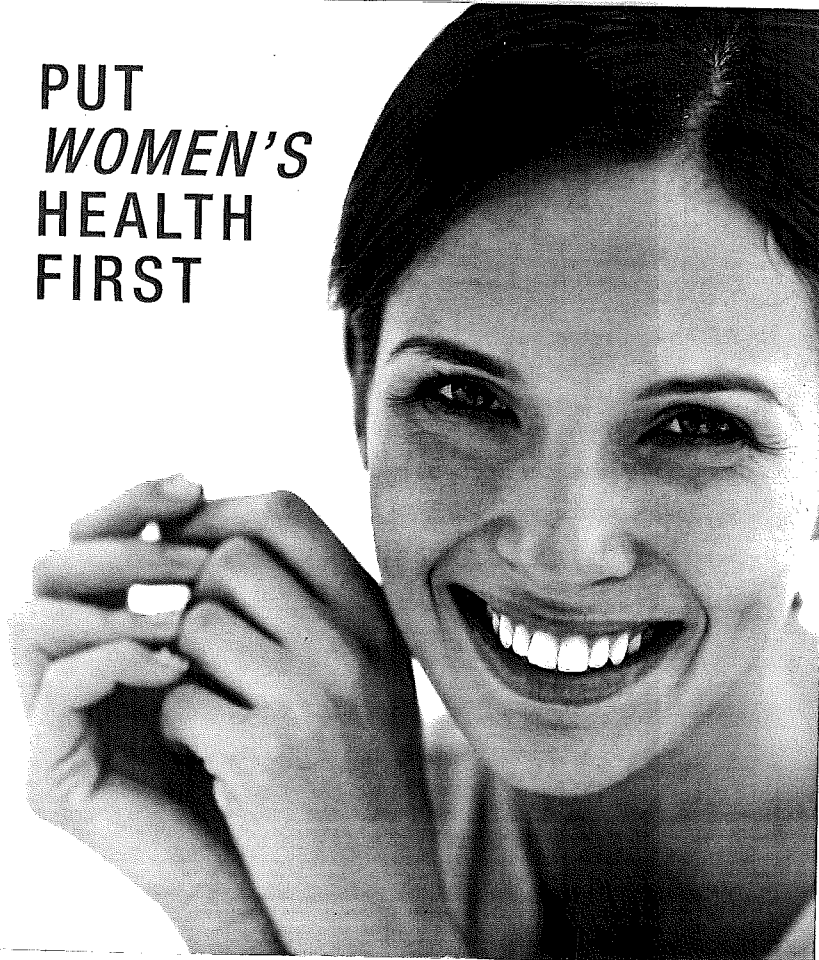
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Name Lovelee Borwell Jr.  
E-mail address borwelllove@yahoo.com  
ZIP Code 27610

Additional Comments:

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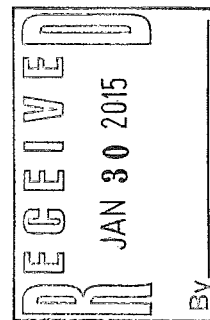
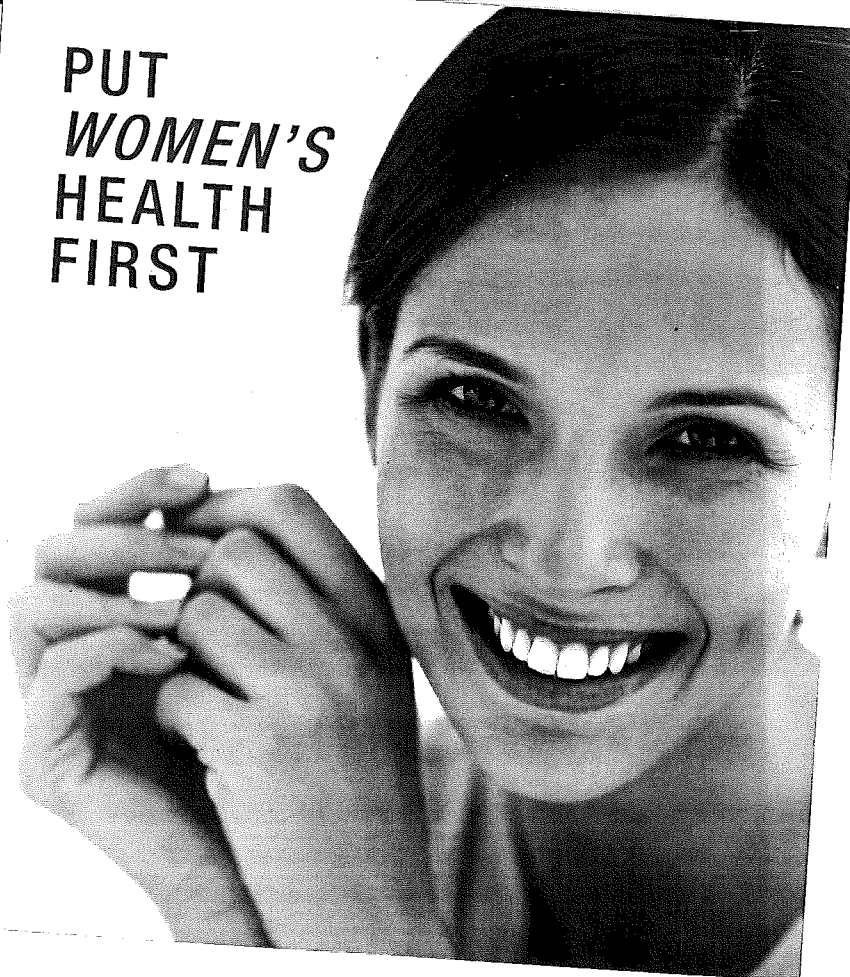


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Name Jack Butler

E-mail address no email

ZIP Code 27511

Additional Comments:

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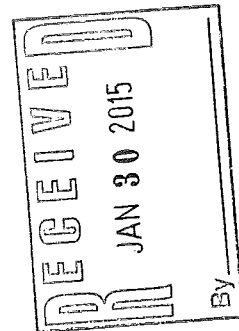
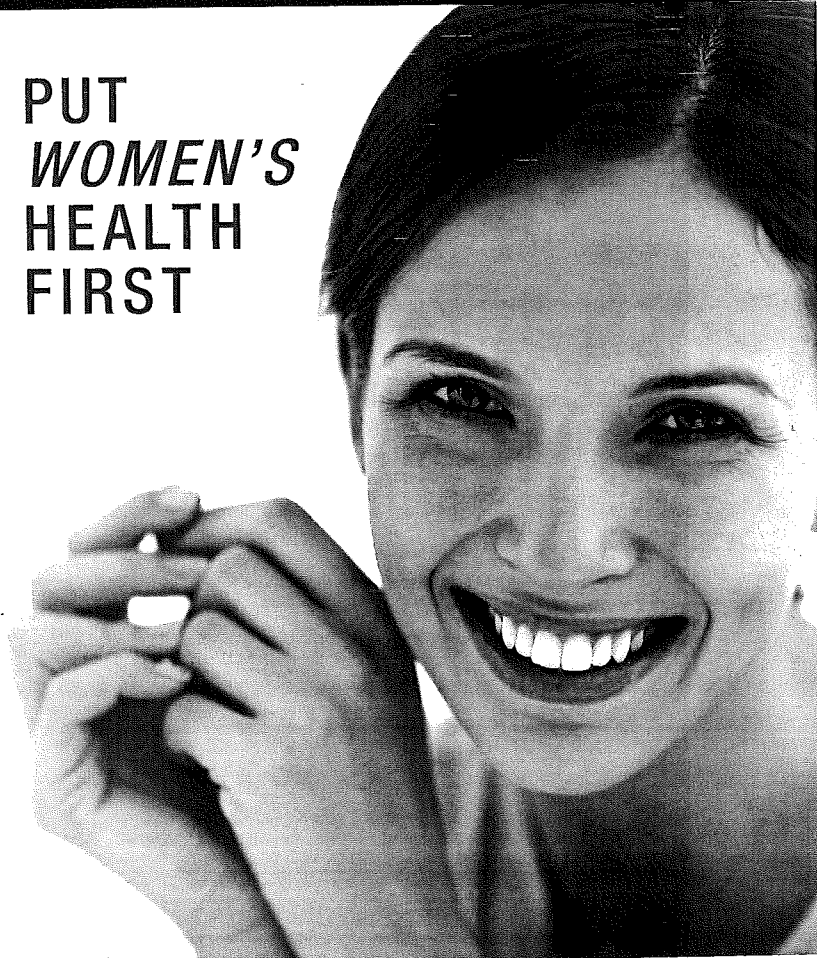
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Name Hilda Butler  
E-mail address twinoakss@lmbarg.com  
ZIP Code 28472

Additional Comments:

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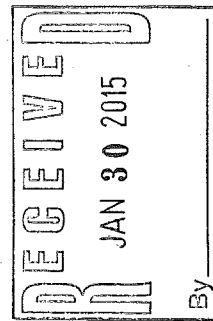
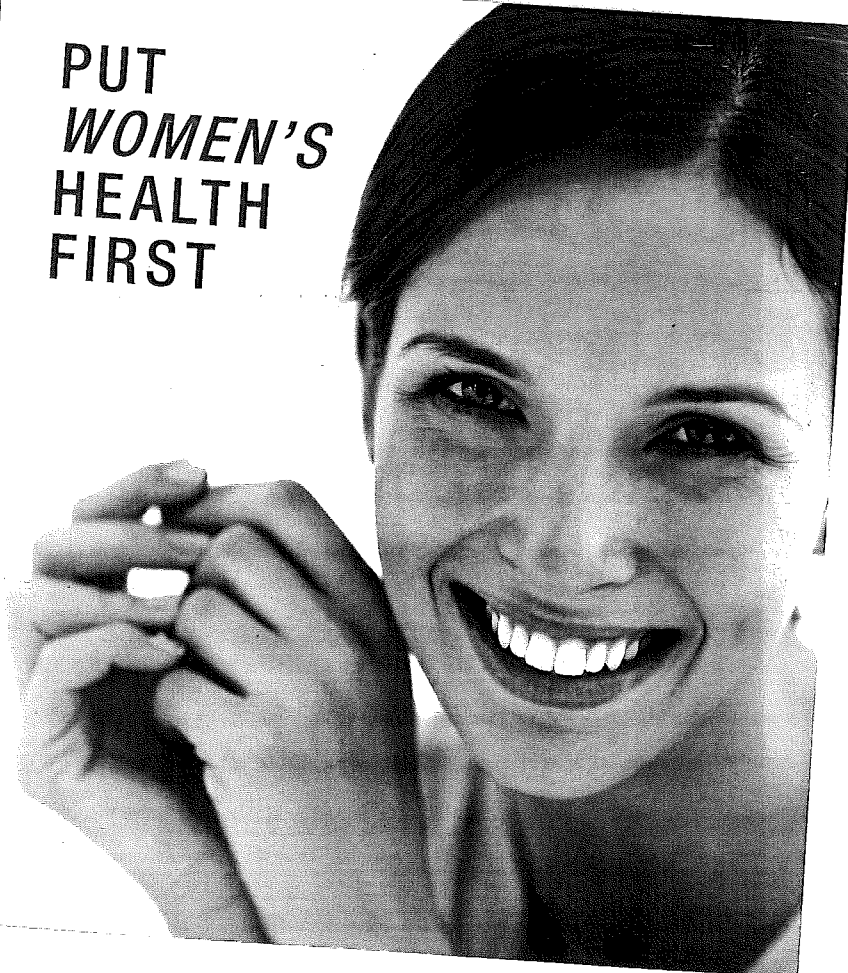


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Name Pat Butler

E-mail address \_\_\_\_\_

ZIP Code 27604

Additional Comments:

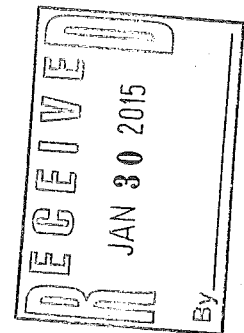
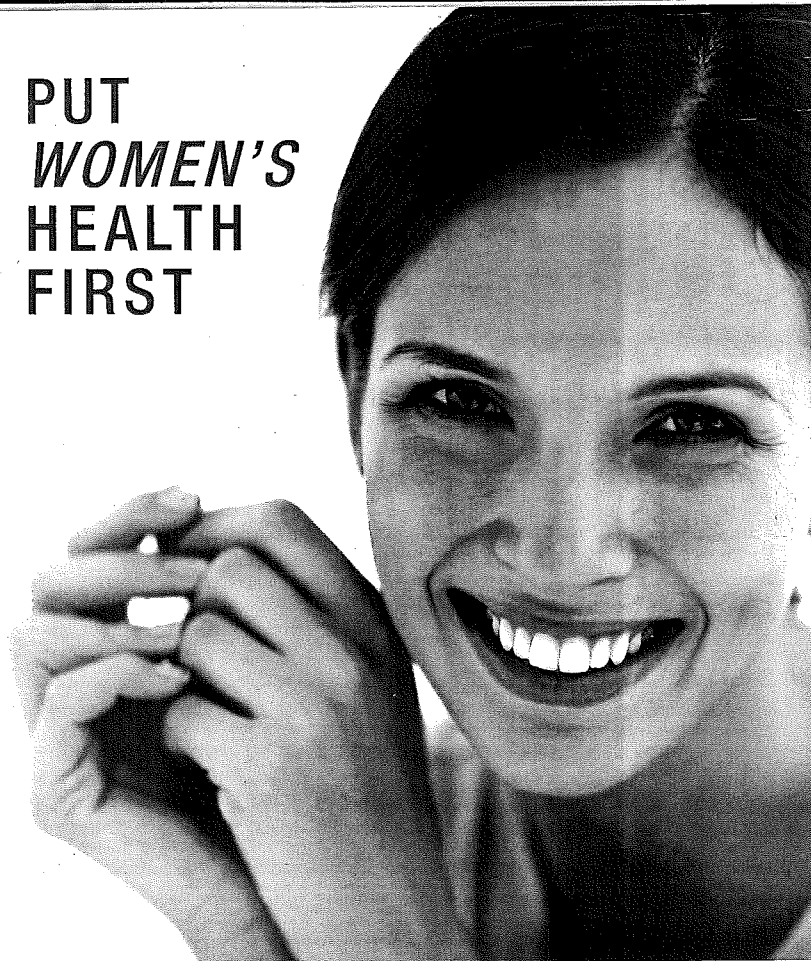
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women's health  
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Name Verna D. Butler-Staton

E-mail address Verna24-@msn.com

ZIP Code 28371

Additional Comments:

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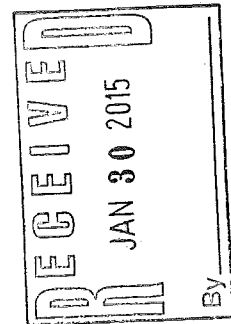
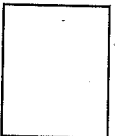
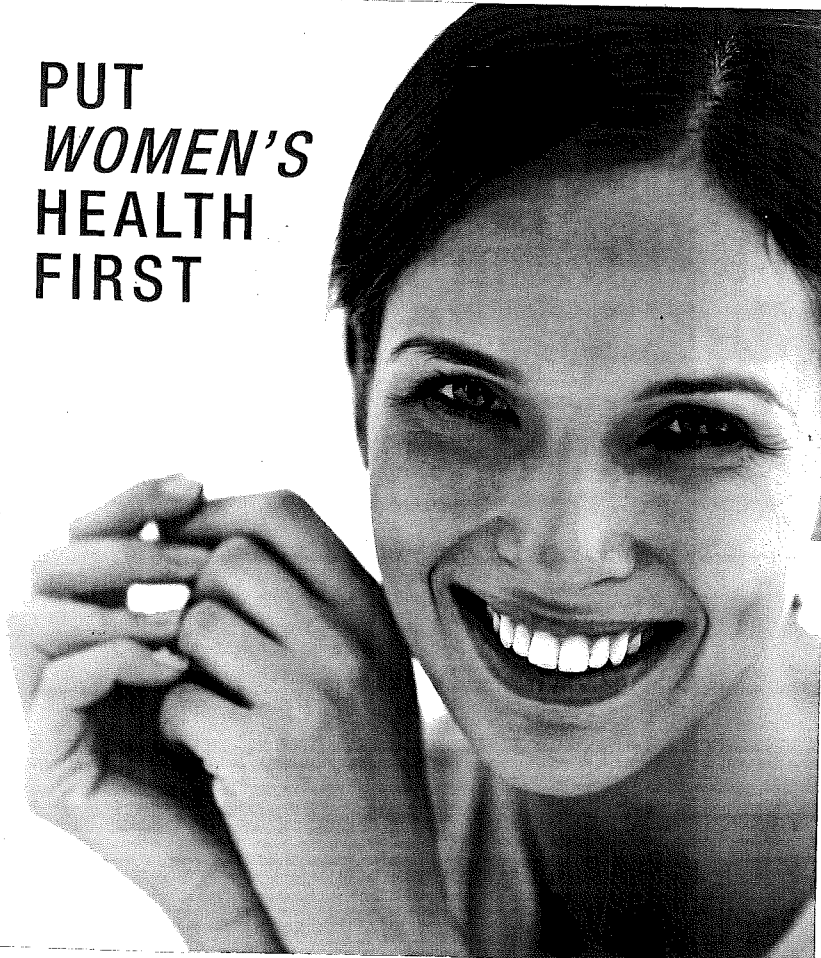


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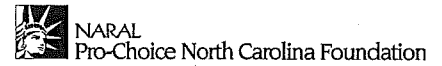
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Name James E. Buxton, Jr.  
E-mail address Jebux32349@aol.com  
ZIP Code 28301

Additional Comments:

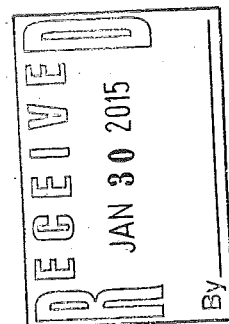
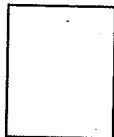
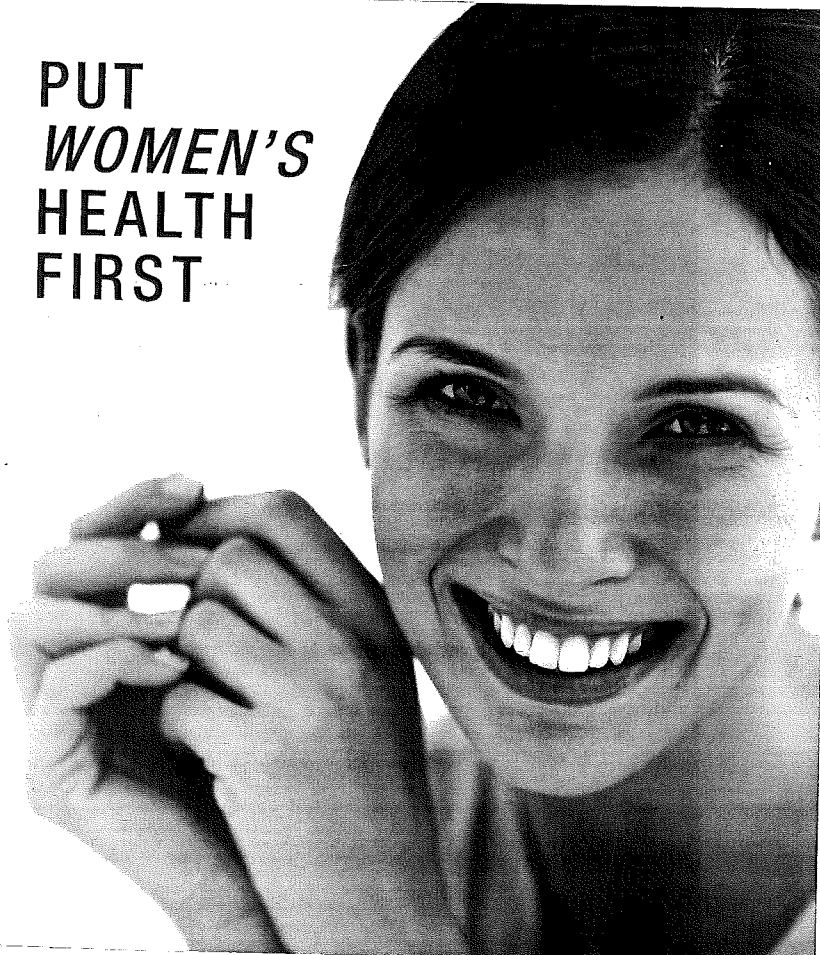
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Name Damen Bynum  
E-mail address hamustheleader@gmail.com  
ZIP Code 27713

Additional Comments:

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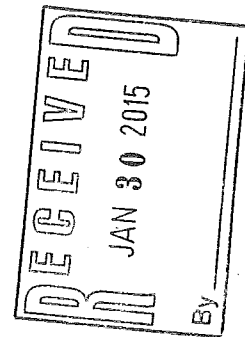
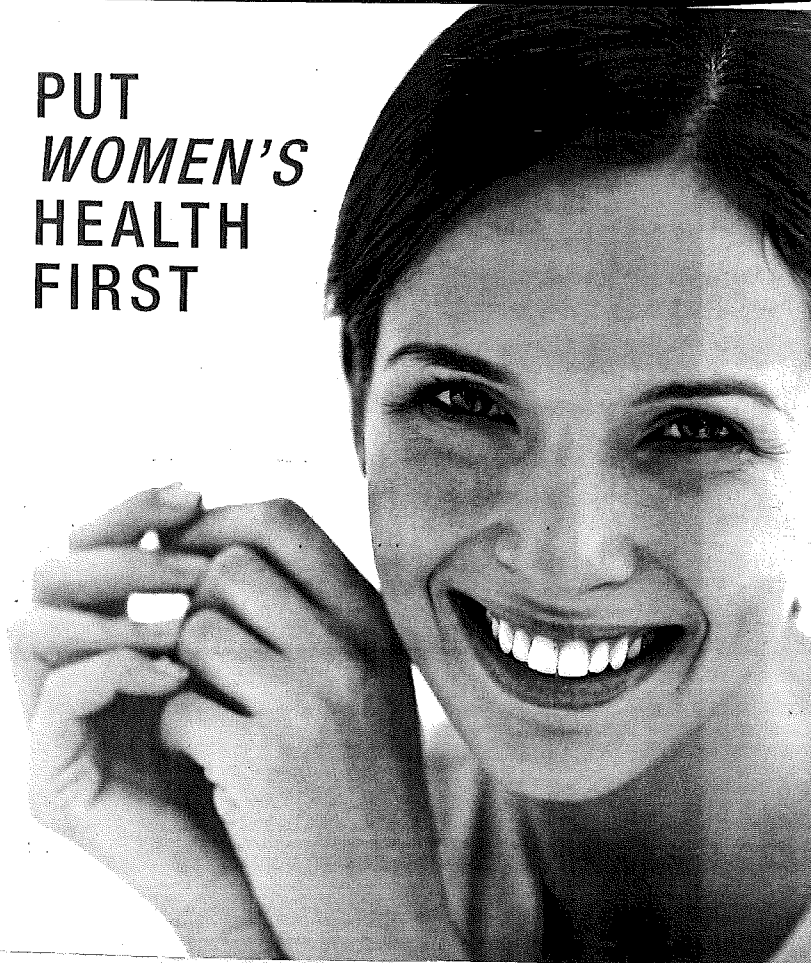
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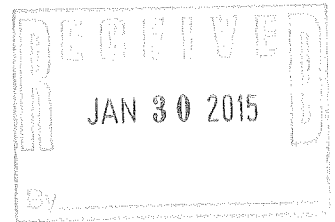
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FIRST NAME:

Meredith

LAST NAME:

Byrd

EMAIL:

mabyrd@gmail.com

ZIP:

28712

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Diana Byrne


E-mail address diana.g.byrne@gmail

ZIP Code 27603 com

Additional Comments:

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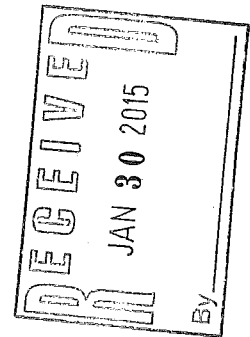
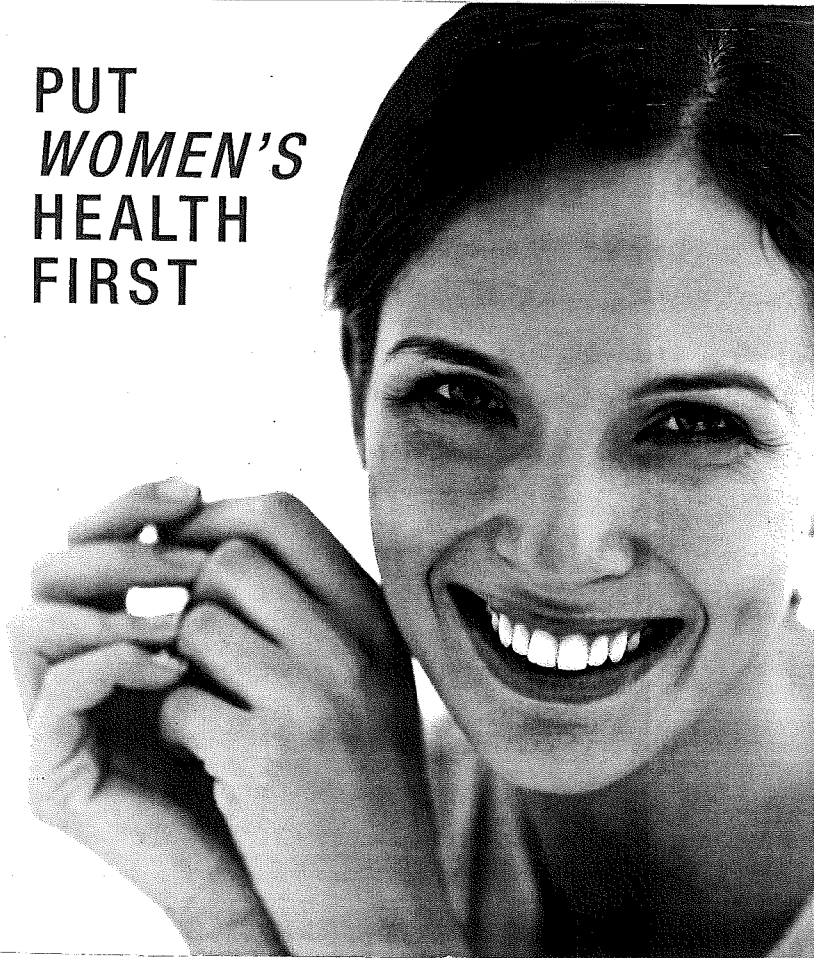
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Pro-Choice North Carolina Foundation

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Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Laurel Caldwell  
E-mail address laurelscaldwell@gmail.com  
ZIP Code 27127

Additional Comments:  
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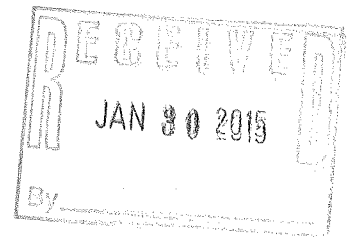
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2701 Mail Service Center  
Raleigh, NC 27699-2701





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FIRST NAME:

LAST NAME:

Juliana Caldwell

EMAIL:

ZIP:

juliana.caldwell365@gmail.com 27707

Optional Comment field:

gmail.com

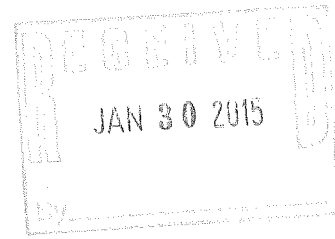
~~Yes~~ No

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FIRST NAME: *Mary Louise*

LAST NAME: *Callaghan*

EMAIL: *mcallaghan@madera.org* ZIP: *27510*

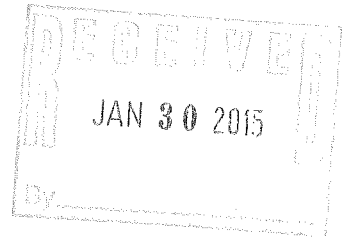
*Optional Comment field:*

<sup>*mcc*</sup> Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



Planned Parenthood Health Systems  
Action Fund, Inc.



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FIRST NAME:

KEVIN

LAST NAME:

CALLAGHAN

EMAIL:

KEVINCALLAGHAN@GMAIL.COM

ZIP:

27510

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

kc

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

# TAKE ACTION!

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Name Pam Callaway  
E-mail address pamcallaway@psbx.com  
ZIP Code 27518

Additional Comments:

Don't let some one's  
malformed interpretation  
of the bible impair  
women's health.

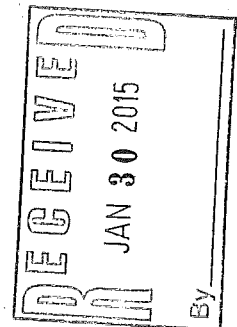
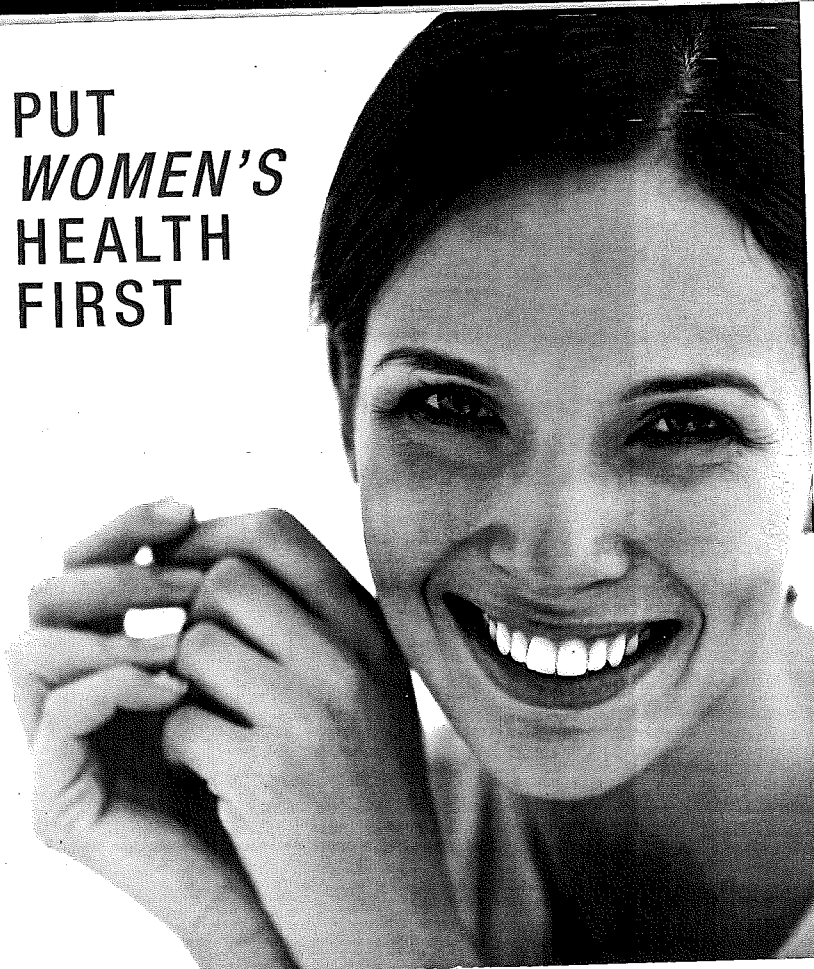
Yes, I would like to receive updates from organizations supporting this comment:

 NARAL  
Pro-Choice North Carolina Foundation

 **Planned Parenthood**  
Act. No matter what.

Planned Parenthood Action Fund of North Carolina

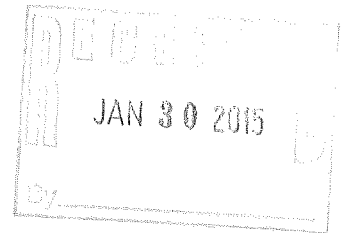
PUT  
**WOMEN'S**  
HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



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Action Fund, Inc.



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FIRST NAME:

LAST NAME:

Barbara Callie

EMAIL:

ZIP:

barb@pascalipiano.com 27705

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Chris Cammarone-Wessel  
E-mail address candrwessel@earthlink.net  
ZIP Code 27613

Additional Comments:

I am a pro choice voter

Yes, I would like to receive updates from organizations supporting this comment:



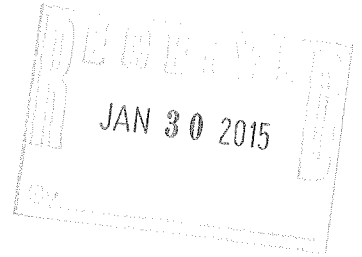
NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina



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FIRST NAME:

EVA

LAST NAME:

Campbell

EMAIL:

Ecampbellma@live.com

ZIP:

28306

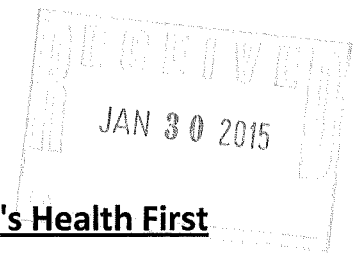
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FIRST NAME:

Jerry

LAST NAME:

Canada

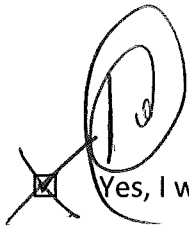
EMAIL:

JerryCanada2@gmail.com

ZIP:

27617

Optional Comment field:



Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



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Name Juan Candela

E-mail address juandela90@gmail.com

ZIP Code 27703

Additional Comments:

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Yes, I would like to receive updates from organizations supporting this comment:

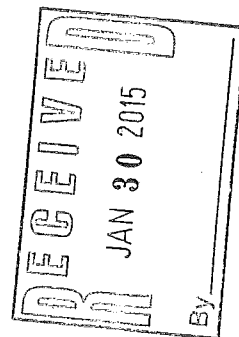
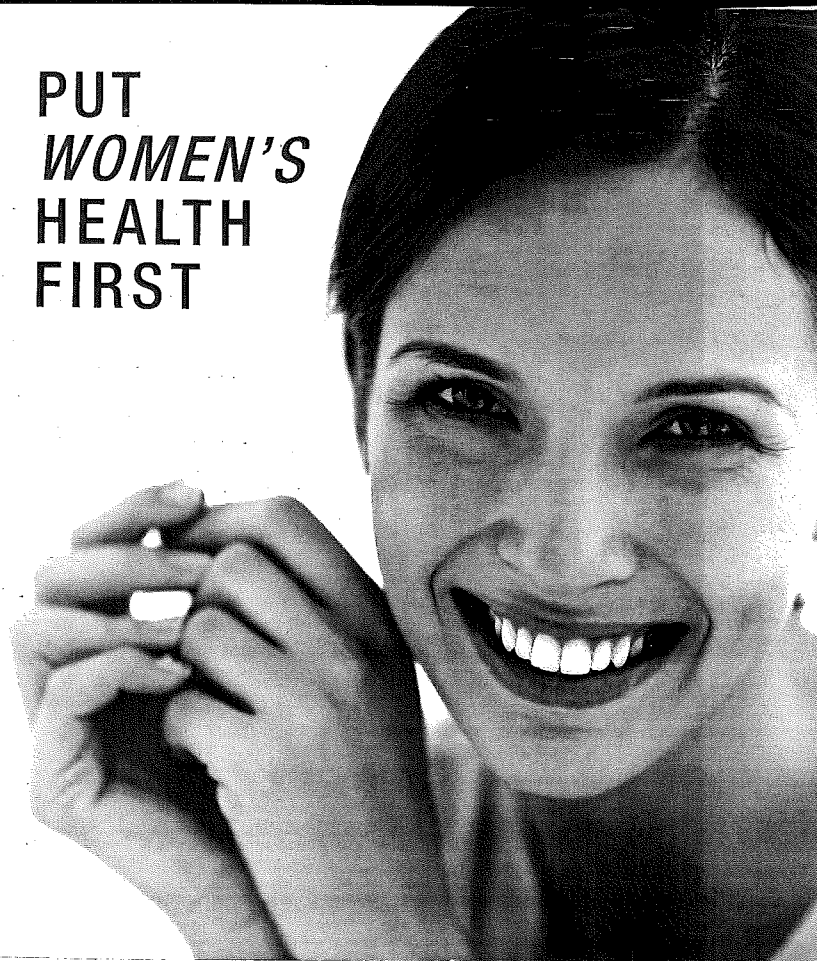


NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

PUT  
WOMEN'S  
HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Jayson Caracciolo  
E-mail address iraizie@yahoo.com  
ZIP Code 27614

Additional Comments:

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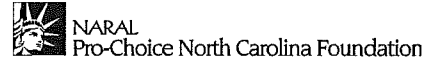
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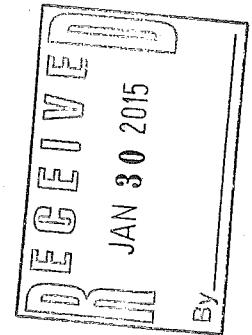
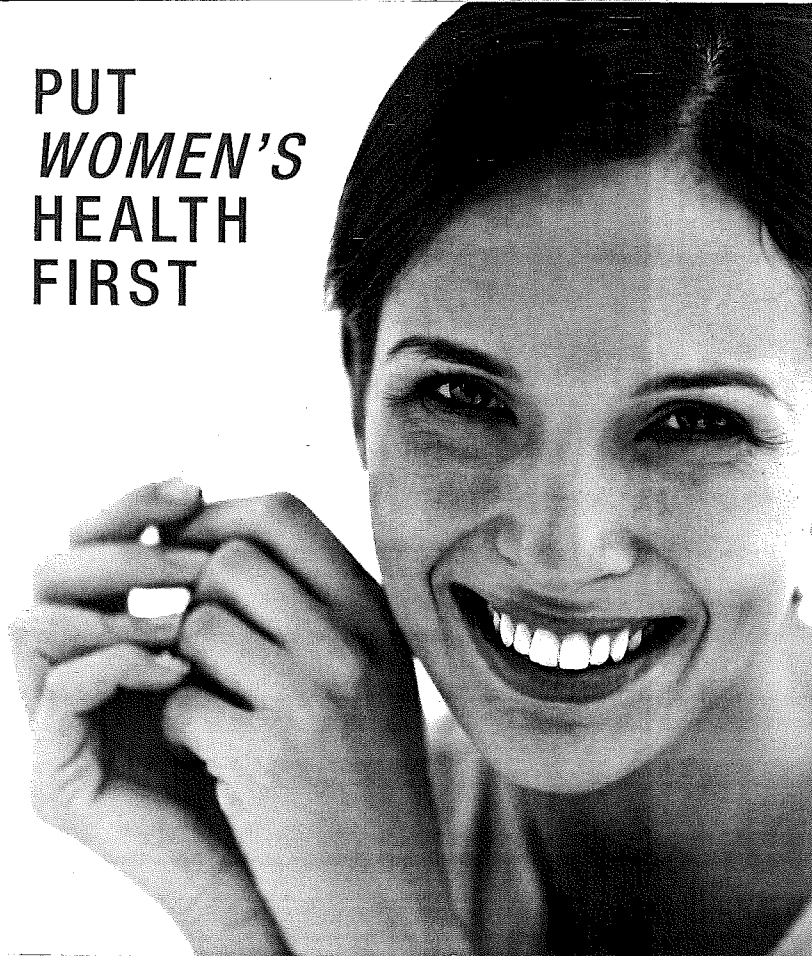
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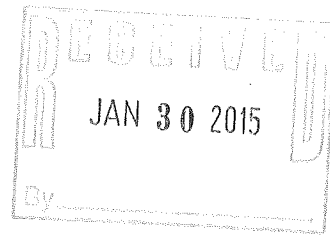


Planned Parenthood Action Fund of North Carolina

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FIRST NAME:

LAST NAME:

Margaret

Carlin

EMAIL:

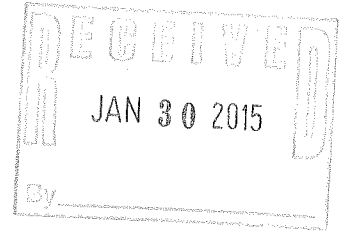
ZIP: 28709

sp311m4n@hotmail.com

Optional Comment field:

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Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



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FIRST NAME:

Douglas

LAST NAME:

Carrier

EMAIL:

terrcens2@gmail.com

ZIP:

27249

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

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Name Simon Carsley  
E-mail address scarsley@unc.edu  
ZIP Code 27514

Additional Comments:

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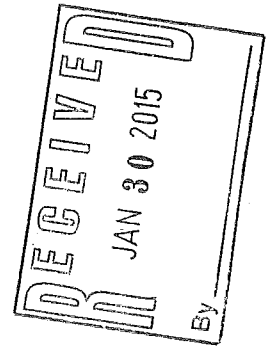
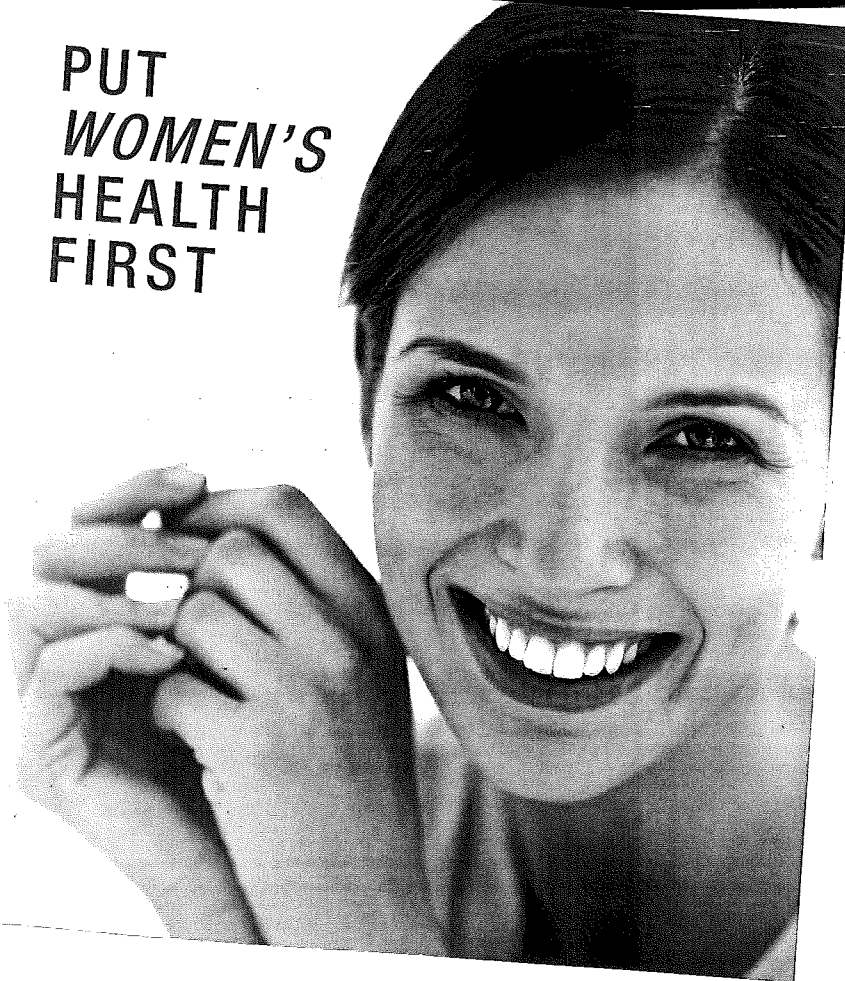


NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

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HEALTH  
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Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701





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FIRST NAME:

*Patrick*

LAST NAME:

*Casper*

EMAIL:

*Casperbdghost@gmail.com*

ZIP:

*28801*

Optional Comment field:

<sup>*Nah*</sup> Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Nora Casterline  
E-mail address nora.casterline@gmail.com  
ZIP Code 27804

Additional Comments:

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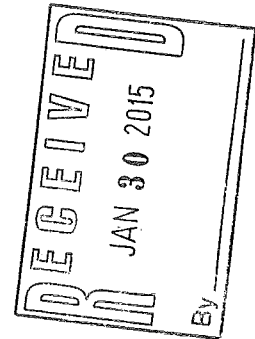
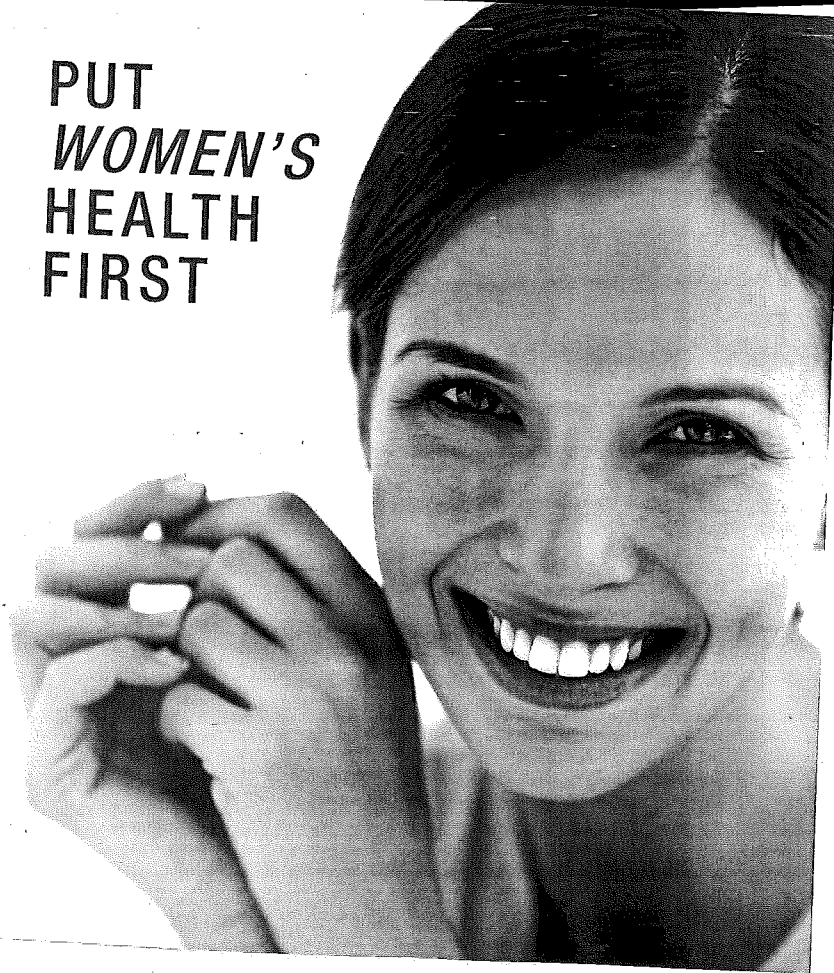
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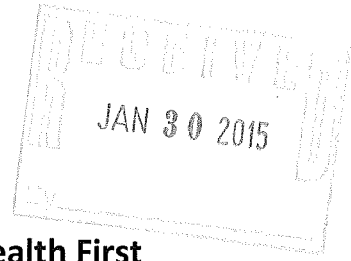


Nadine Pfeiffer  
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FIRST NAME:

Victoria

LAST NAME:

Catalano

EMAIL:

ZIP:

28802

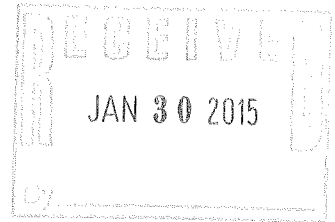
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FIRST NAME:

Amy

LAST NAME:

Caulfield

EMAIL:

ZIP:

27613

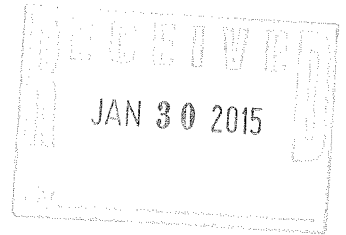
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FIRST NAME:

LAST NAME:

Amy Caulfield

EMAIL:

ZIP:

abcaulfield@hotmail.com 27613

*Optional Comment field:*

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Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



Planned Parenthood Health Systems  
Action Fund, Inc.



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FIRST NAME:

Jessica

LAST NAME:

Cavey

EMAIL:

ZIP:

27603

*Optional Comment field:*

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

# TAKE ACTION!

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Name Deborah Cearnel  
E-mail address deborahcearnel@gmail.com  
ZIP Code 27604

Additional Comments:

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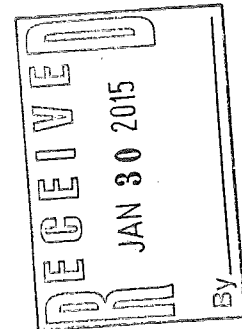
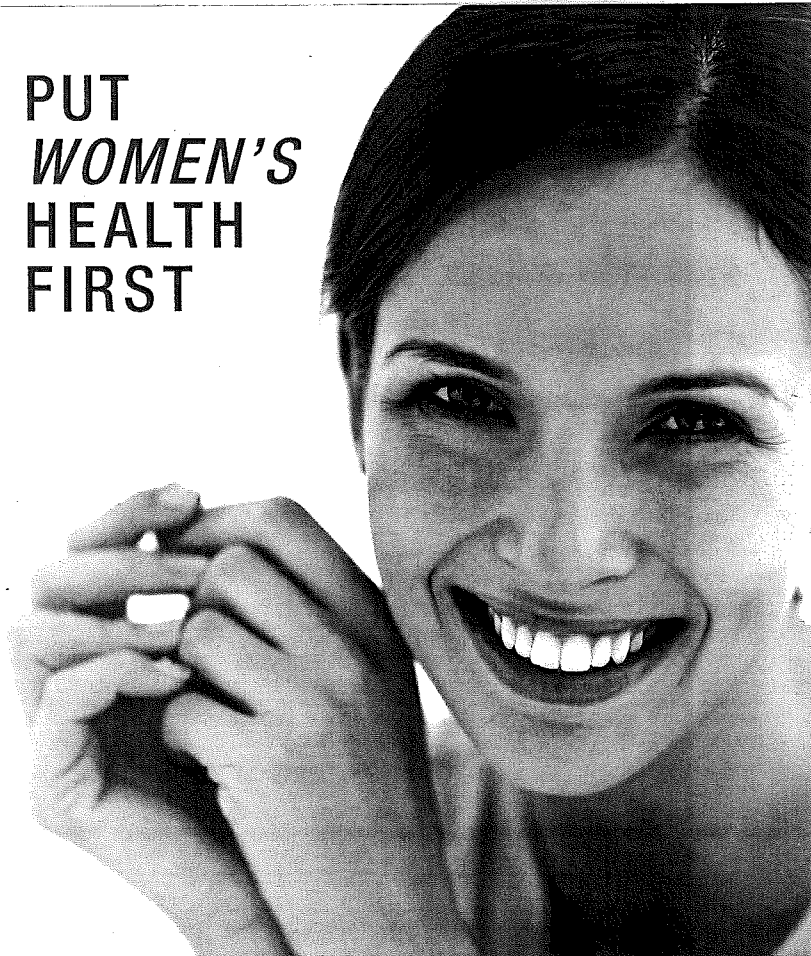
Yes, I would like to receive updates from organizations supporting this comment:

 **NARAL**  
Pro-Choice North Carolina Foundation

 **Planned Parenthood**  
Act. No matter what.

Planned Parenthood Action Fund of North Carolina

PUT  
**WOMEN'S**  
HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Rebecca Ceresse  
E-mail address rceresse@gmail.com  
ZIP Code 27511

Additional Comments:

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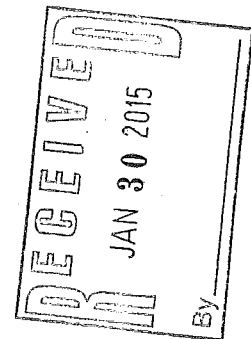
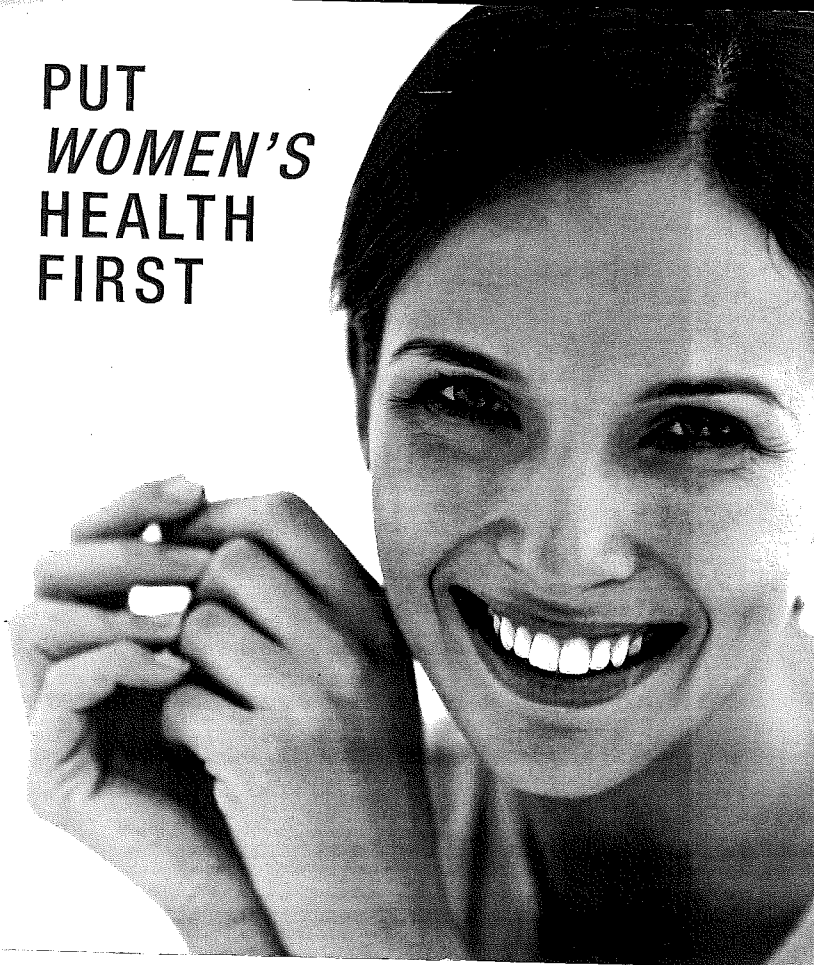
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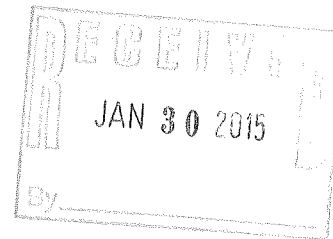
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2701 Mail Service Center  
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FIRST NAME:

LAST NAME:

*Enika*

*Cumley*

EMAIL:

ZIP:

*ejenwan@emori.*

*27514*

Optional Comment field:

*mehedith-edw*

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Sara Chakoumikos  
E-mail address purplechaka@yahoo.co  
ZIP Code 29806

Additional Comments:

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Yes, I would like to receive updates from organizations supporting this comment:

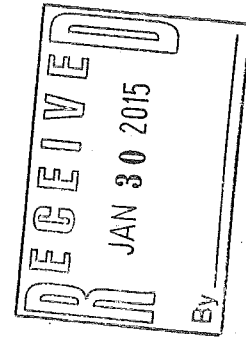
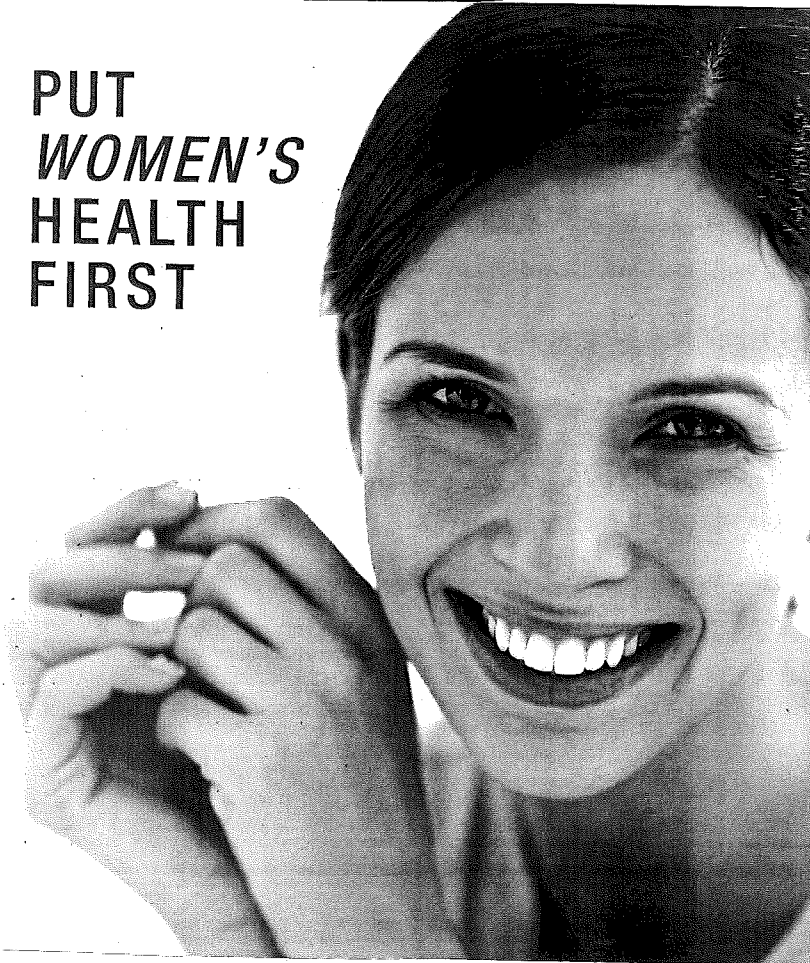


NARAL  
Pro-Choice North Carolina Foundation



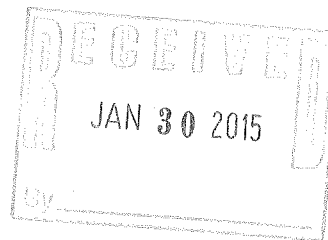
Planned Parenthood Action Fund of North Carolina

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HEALTH  
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Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701





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FIRST NAME:

Emily

LAST NAME:

Charette

EMAIL:

emilyrcharette@hotmail.com

ZIP:

28805

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Samantha Charm

E-mail address Charm.Samantha@gmail.com

ZIP Code 27510

Additional Comments:

Please put women's  
health before politics.  
Let science dictate  
medical practice.

Yes, I would like to receive updates from organizations supporting this comment:



NARAL  
Pro-Choice North Carolina Foundation



Planned  
Parenthood®  
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Name Emily Chavez  
E-mail address emilyschavez@smn1.com  
ZIP Code 27701

Additional Comments:

Please keep scientific fact & humanistic compassion at the forefront of your decisions in policy

Yes, I would like to receive updates from organizations supporting this comment:

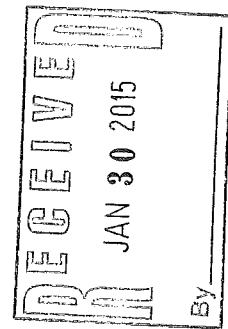
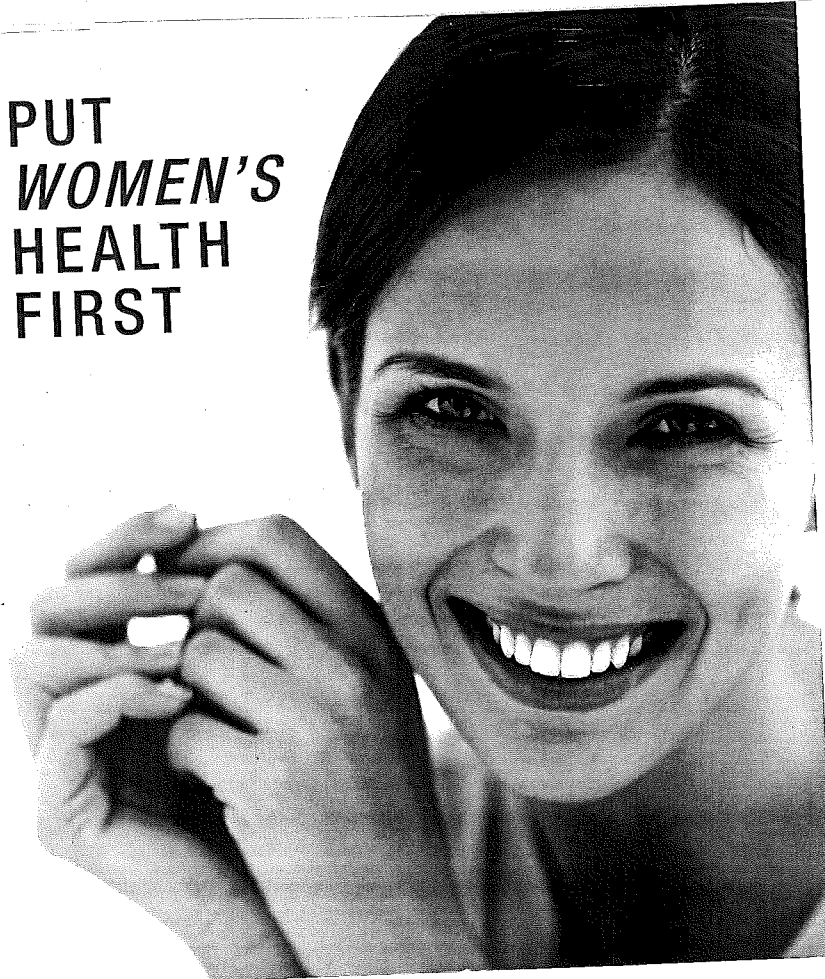


NARAL  
Pro-Choice North Carolina Foundation



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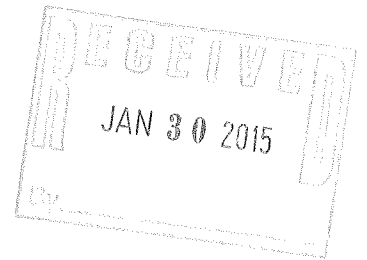
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Nadine Pfeiffer  
Division of Health Service Regulation  
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FIRST NAME:

*Drew*

LAST NAME:

*Cherner*

EMAIL:

ZIP:

*28804*

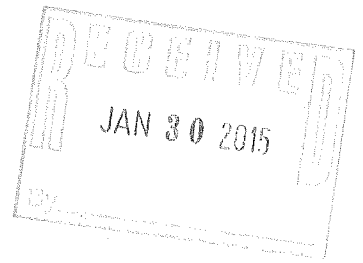
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FIRST NAME:

LAST NAME:

Elizabeth Cherner

EMAIL:

ZIP:

28804

Optional Comment field:

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Name Celia Chetrey  
E-mail address celiachetrey@gmail.com  
ZIP Code 27603

Additional Comments:

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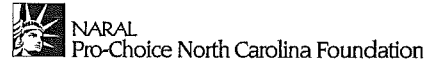
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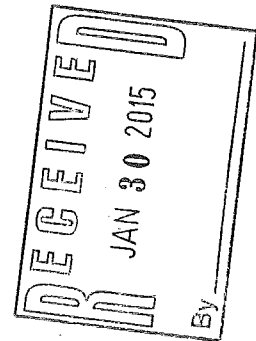
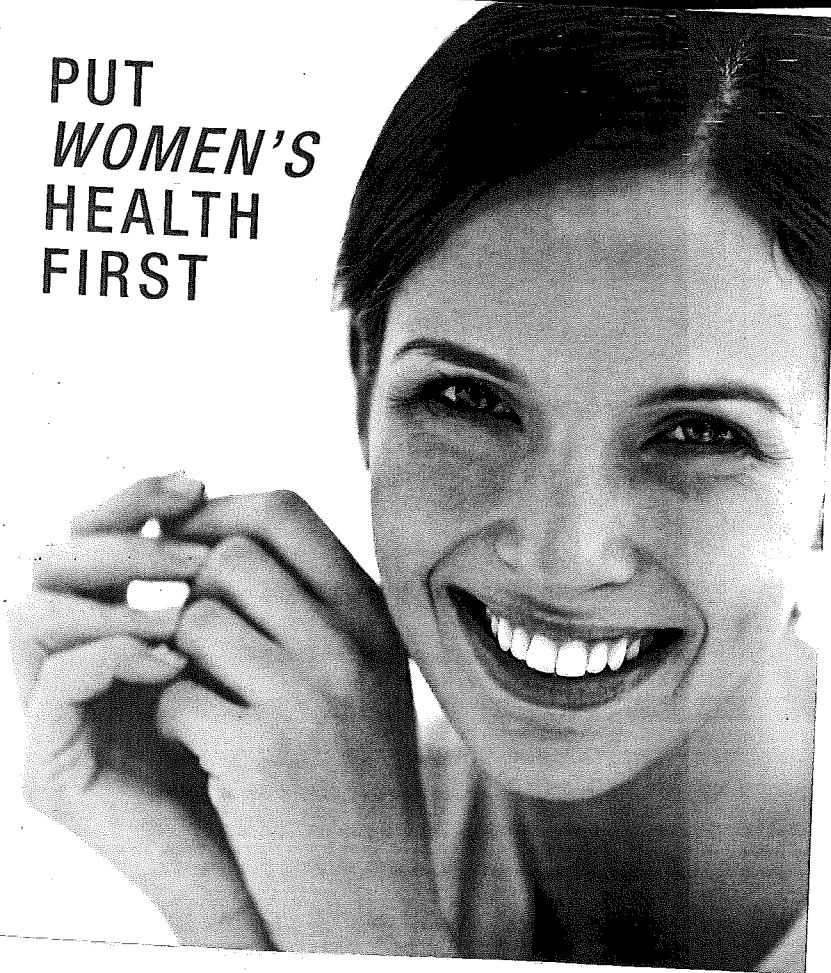
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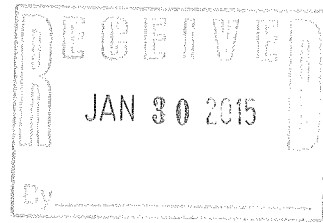


Planned Parenthood Action Fund of North Carolina

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Division of Health Service Regulation  
2701 Mail Service Center  
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FIRST NAME:

LAST NAME:

Connor

Choate

EMAIL:

ZIP:

connor.knowles.choate

27017

Optional Comment field:

@gmail.com

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Hugh Cholmondeley  
E-mail address thinkelectronic@gmail.com  
ZIP Code 28806

Additional Comments:

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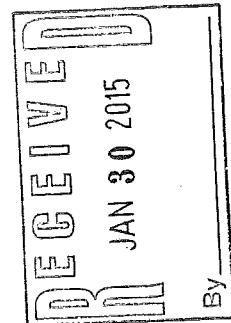
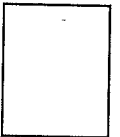
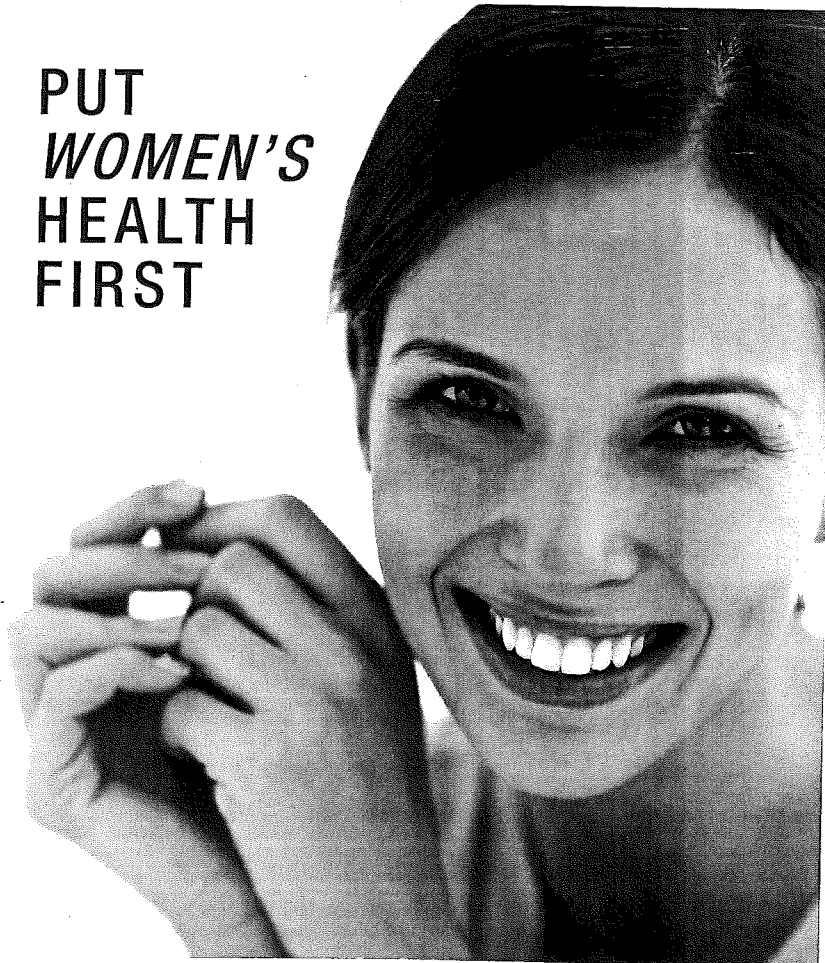
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Planned Parenthood Action Fund of North Carolina

## PUT WOMEN'S HEALTH FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



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Name Lauren Christian  
E-mail address christie@live.unc.edu  
ZIP Code 27514

Additional Comments:

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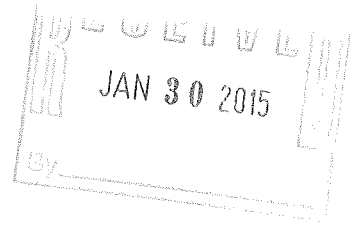
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FIRST NAME:

Alexis

LAST NAME:

Christie

EMAIL:

Alexisbchristie@gmail.com

ZIP:

27576

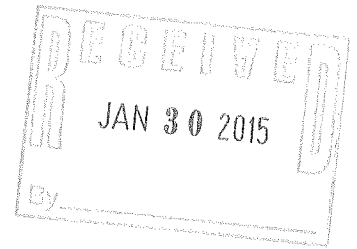
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FIRST NAME:

Ruth

LAST NAME:

Christie

EMAIL:

ZIP:

28804

Optional Comment field:

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Name: Patricia Parker Ciaffone  
E-mail address: trishnaciaffone@gmail.com  
ZIP Code: 28740

Additional Comments:

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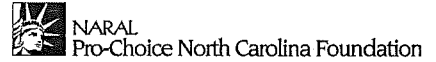
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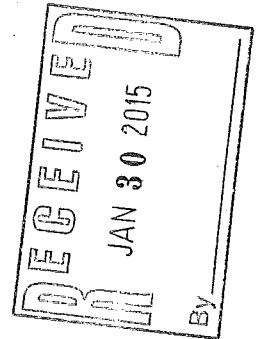
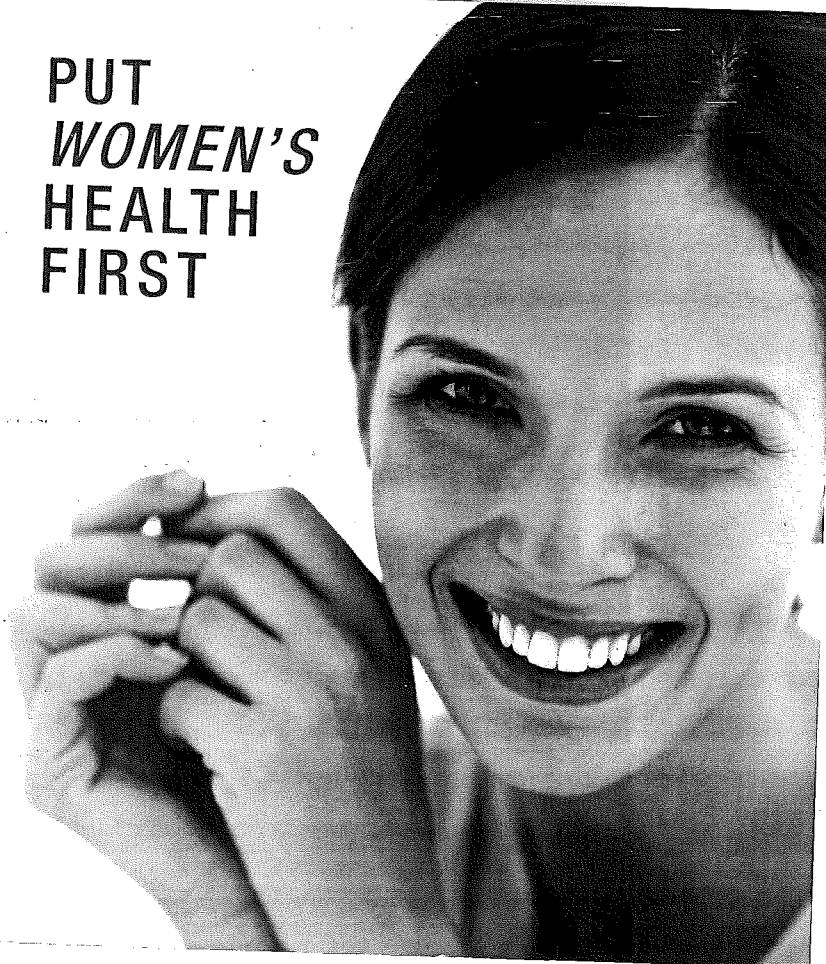
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Yes, I would like to receive updates from organizations supporting this comment:



Planned Parenthood Action Fund of North Carolina

PUT  
WOMEN'S  
HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

# TAKE ACTION!

Tell the Department of Health & Human Services:  
Put Women's Health First

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Name Jane Garcia  
E-mail address jjgarcia@gmail.com  
ZIP Code 27407

Additional Comments:

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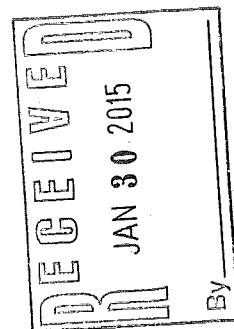
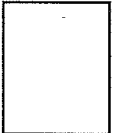
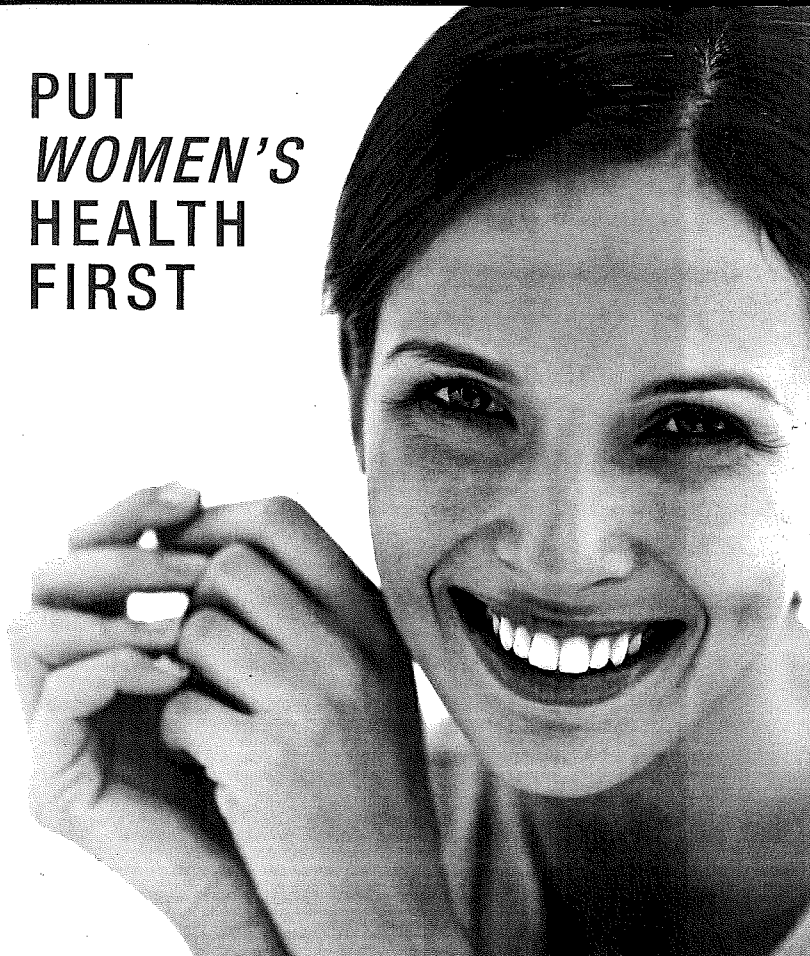
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Planned Parenthood Action Fund of North Carolina

PUT  
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HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



Planned Parenthood Health Systems  
Action Fund, Inc.

RECEIVED  
JAN 30 2015

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FIRST NAME:

Katelyn

LAST NAME:

Clackson

EMAIL:

kclackson@gmail.com

ZIP:

28270

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Christina Clark

E-mail address cmclark629@gmail.com

ZIP Code 27517

Additional Comments:  
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Yes, I would like to receive updates from organizations supporting this comment:

 NARAL  
Pro-Choice North Carolina Foundation

 **Planned  
Parenthood**  
Act. No matter what.

Planned Parenthood Action Fund of North Carolina

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Name Charlotte Clarke  
E-mail address cclarke2@unca.edu  
ZIP Code 28739

Additional Comments:

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Yes, I would like to receive updates from organizations supporting this comment:

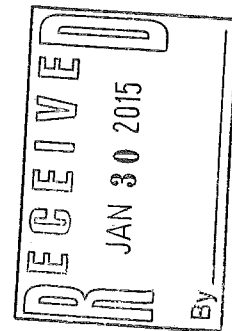
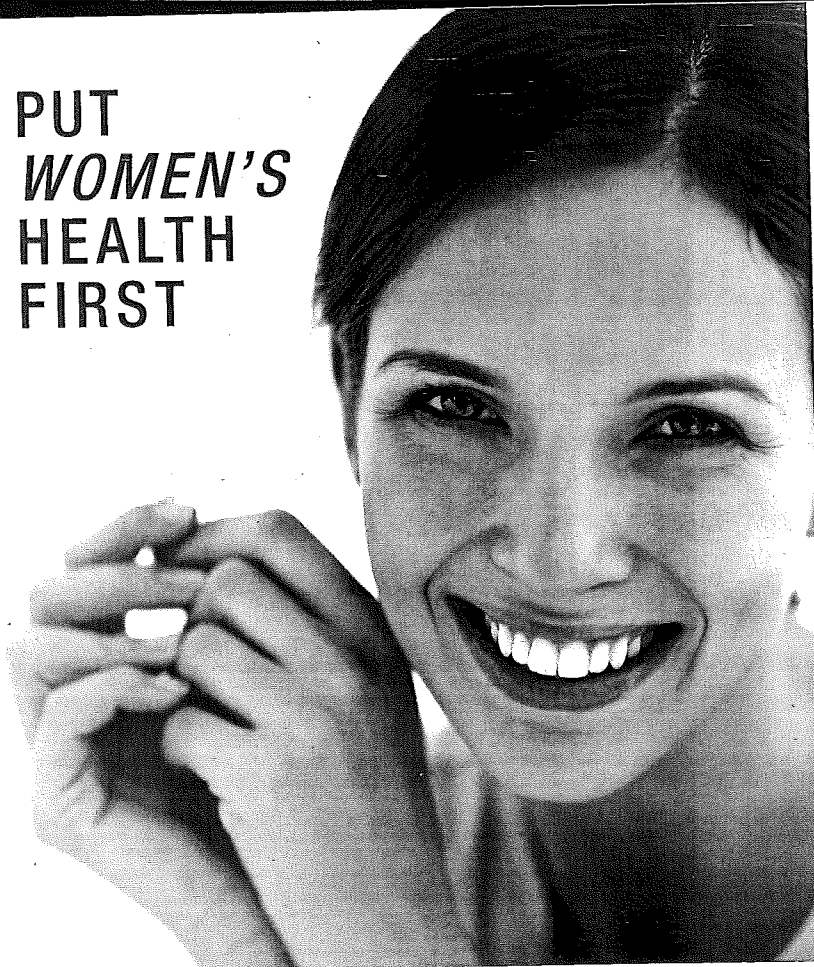


NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

PUT  
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HEALTH  
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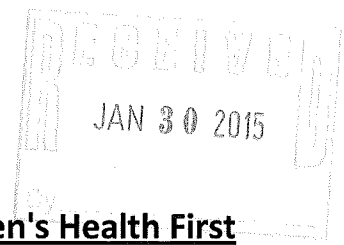


Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701





Planned Parenthood Health Systems  
Action Fund, Inc.



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FIRST NAME:

Laurel

LAST NAME:

Claubagh

EMAIL:

ZIP:

27023

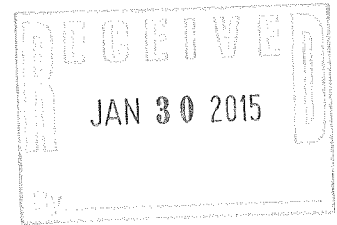
*Optional Comment field:*

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



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FIRST NAME:

Charlotte

LAST NAME:

Claypoole

EMAIL:

cclaypo@gmail.com

ZIP:

27606

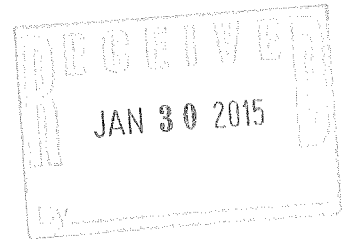
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FIRST NAME:

Connie

LAST NAME:

Coady

EMAIL:

ZIP:

28801

*Optional Comment field:*

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Wesley Cochran

E-mail address Wcochran@unca.edu

ZIP Code 27604

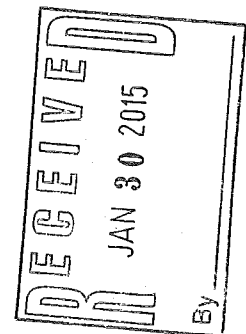
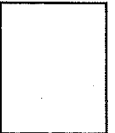
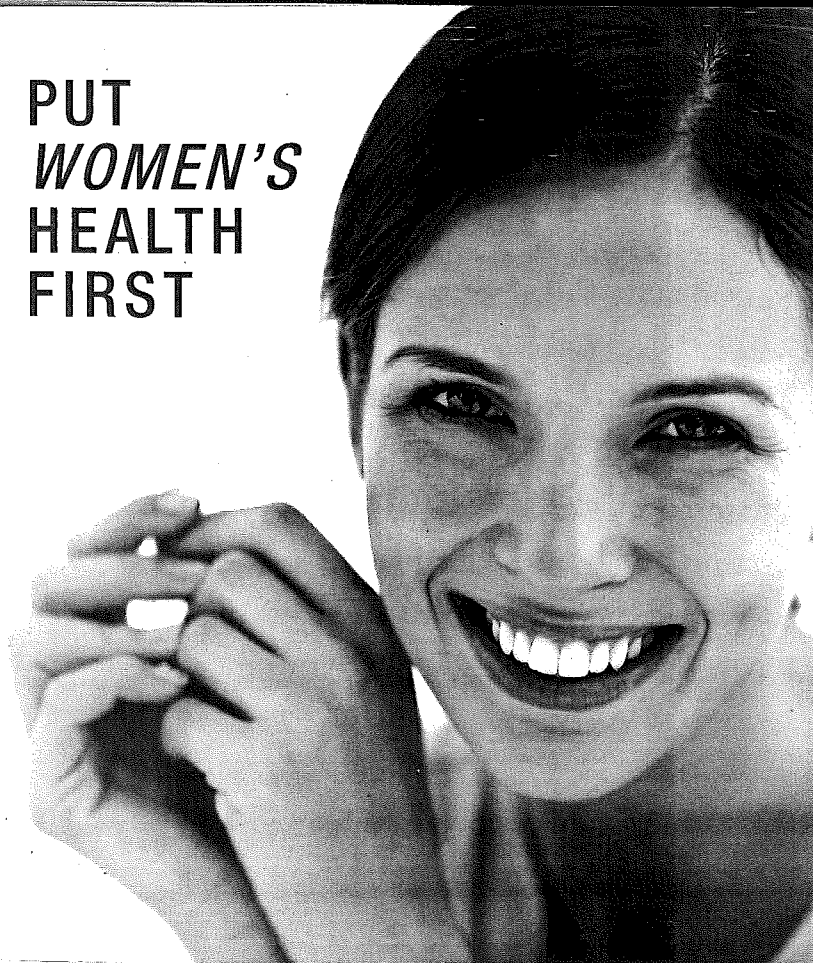
Additional Comments:  
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Planned Parenthood Action Fund of North Carolina

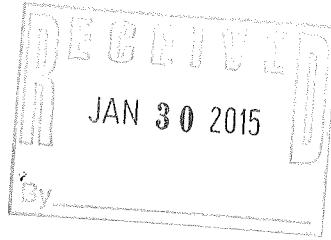
PUT  
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Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
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FIRST NAME:

LAST NAME:

Jessica Cochran

EMAIL:

ZIP:

jessica-cochran@yahoo.com 27605

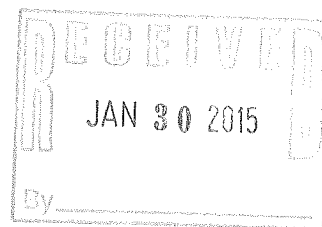
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FIRST NAME:

LAST NAME:

Destiny Nicole Cofield

EMAIL:

ZIP:

dcofield2010@hotmail.com 27613

*Optional Comment field:*

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Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name OYENDJA CHRISTELLE LOHEMBE

E-mail address olohembe@hotmail.com

ZIP Code 28212

Additional Comments:

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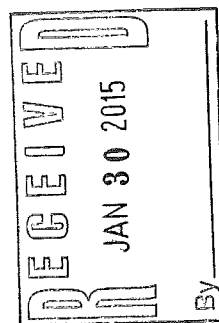
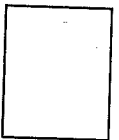
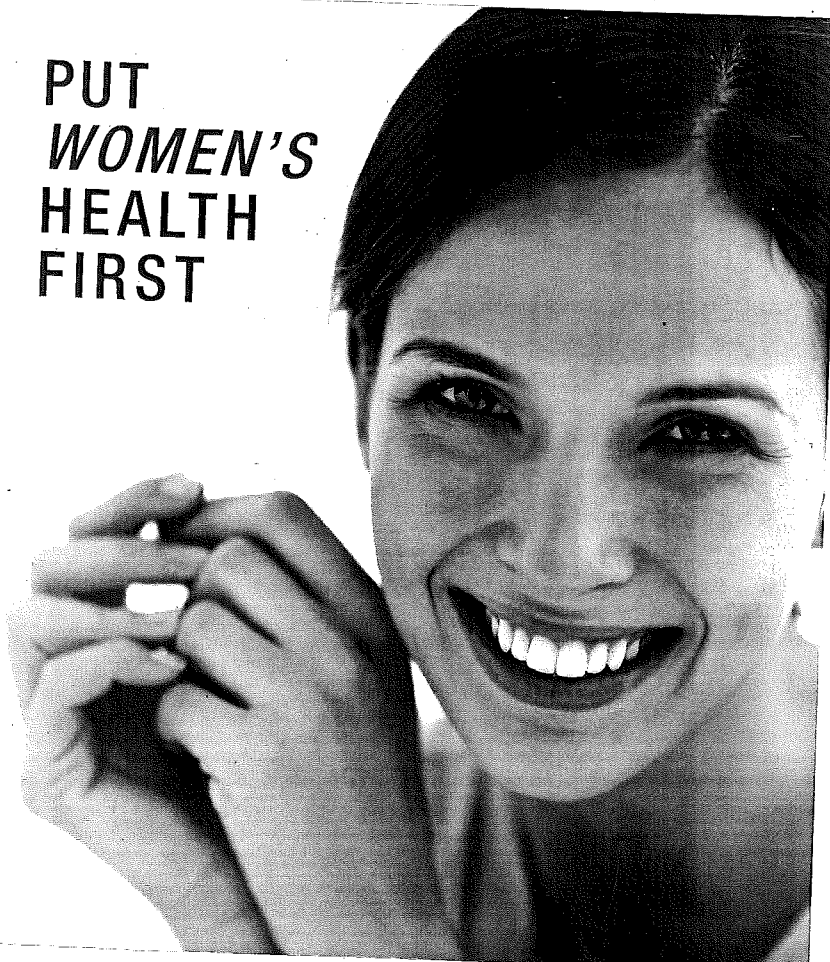


NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

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WOMEN'S  
HEALTH  
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Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name CAROLA V COHN

E-mail address CAROLAV@bellsouth.net

ZIP Code 28739

Additional Comments:

Women must be allowed to make their own reproductive decisions free from coercion

Yes, I would like to receive updates from organizations supporting this comment:



NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina



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Name Sue Cole

E-mail address suecyle@bellsouth.net

ZIP Code 27410

Additional Comments:

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Yes, I would like to receive updates from organizations supporting this comment: *Already do. Please*

*don't put me on more email lists.*



NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

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Name Jennifer Cole  
E-mail address Cole.jennifer2@gmail.com  
ZIP Code 27510

Additional Comments:

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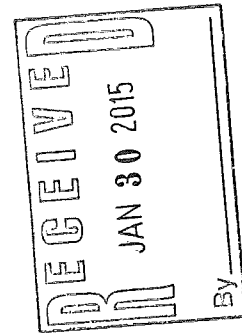
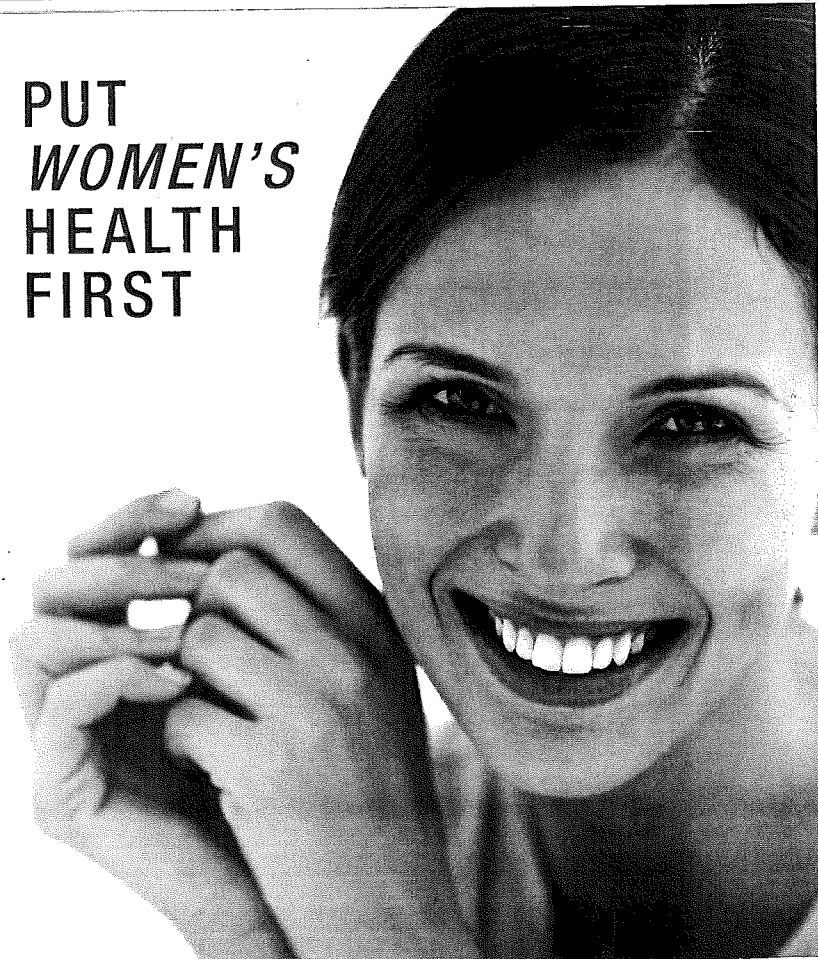


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Name Sydney Cole

E-mail address scole2@unca.edu

ZIP Code 28041

Additional Comments:

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Yes, I would like to receive updates from organizations supporting this comment:

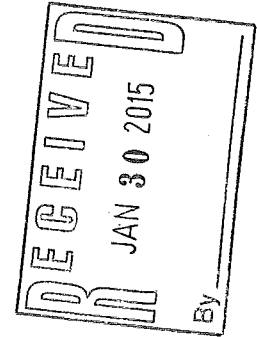
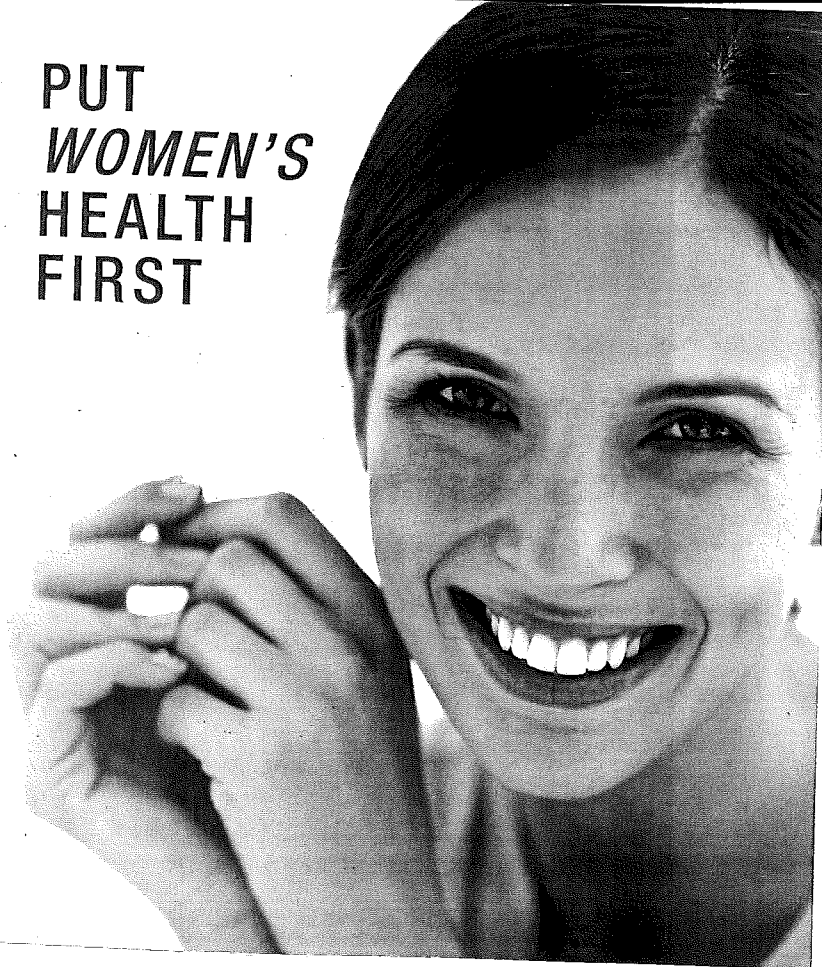


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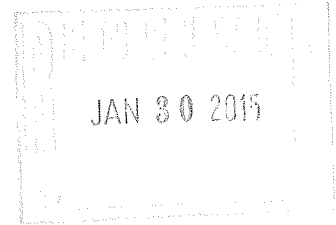
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FIRST NAME:

LAST NAME:

Kathleen

Collins

EMAIL:

ZIP:

authorpoet@embargo.com

28348

Optional Comment field:

concerned with additional clause(s) i.e. conscious clause or Personhood laws that could possibly become problematic.

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name JEFFREY J. COLLINS

E-mail address jcollins@pappasventures.c

ZIP Code 27514

Additional Comments:  
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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Yes, I would like to receive updates from organizations supporting this comment:



NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

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Name Gaye Collios  
E-mail address NO EMAIL!  
ZIP Code 27540

Additional Comments:

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Yes, I would like to receive updates from organizations supporting this comment:

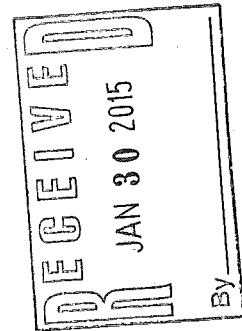
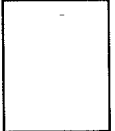
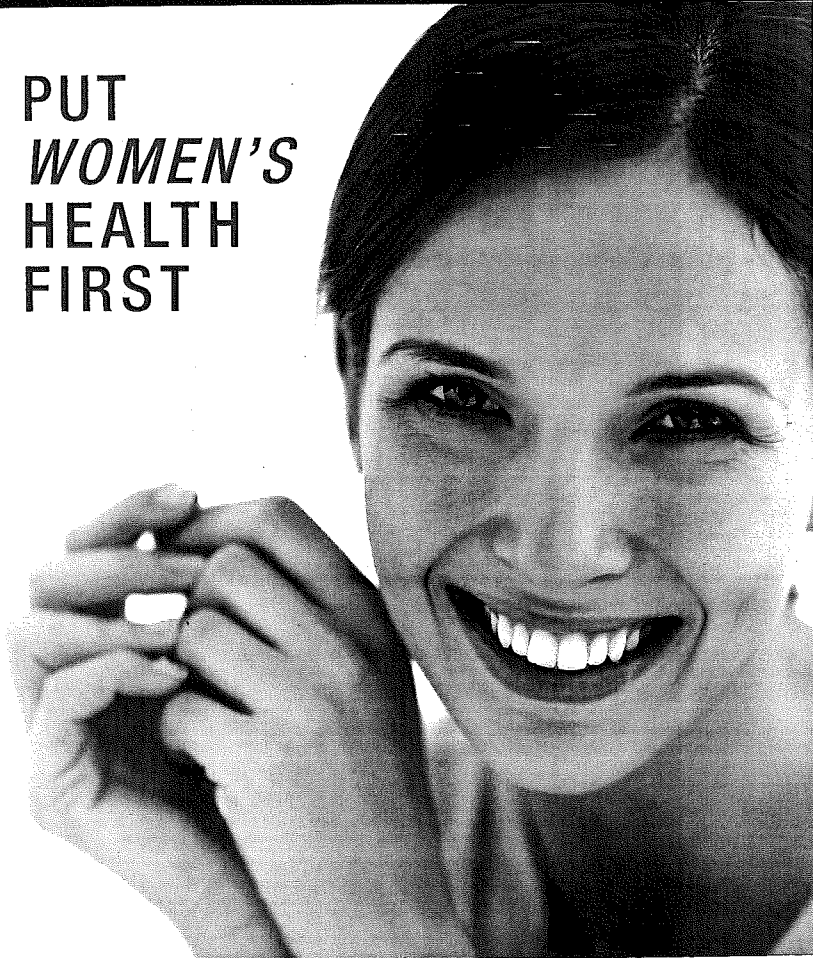


NARAL  
Pro-Choice North Carolina Foundation

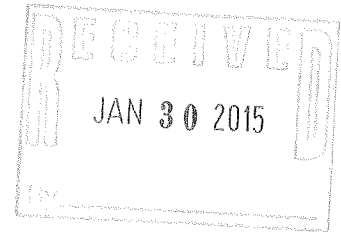


Planned Parenthood Action Fund of North Carolina

PUT  
*WOMEN'S*  
HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



Planned Parenthood Health Systems  
Action Fund, Inc.

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FIRST NAME:

LAST NAME:

Brianna

Collins

EMAIL:

ZIP:

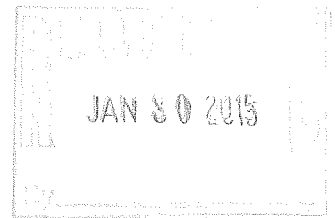
briannas.collins@gmail.com

43202

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



Planned Parenthood Health Systems  
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FIRST NAME:

LAST NAME:

*Nmyia Imaci*

*Collins*

EMAIL:

ZIP:

*nunki1996@embargo.mail.com*

*28348*

Optional Comment field:

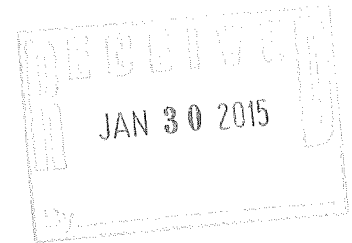
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FIRST NAME:

LAST NAME:

Anne Collins McLaughlin

EMAIL:

ZIP:

anne.mclaughlin@gmail.com 27608

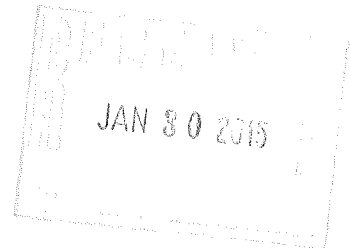
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FIRST NAME:

LAST NAME:

Tori

Collins-Newsom

EMAIL:

ZIP:

Missledy28348@gmail.com

28306

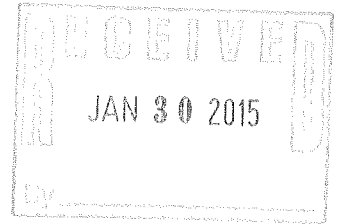
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FIRST NAME:

Marie

LAST NAME:

Colton

EMAIL:

ZIP:

28801

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Helen L. Compton  
E-mail address helen.compton@gmail.com  
ZIP Code 2705

Additional Comments:

I am happy that health care providers have played a major role in developing these rates.

Please put Women's Health First.

Yes, I would like to receive updates from organizations supporting this comment:



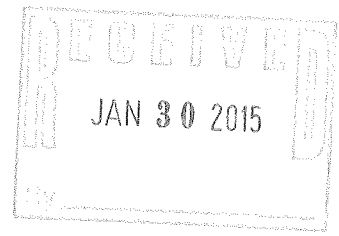
NARAL  
Pro-Choice North Carolina Foundation



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FIRST NAME:

LAST NAME:

Kristin

Comstock

EMAIL:

ZIP:

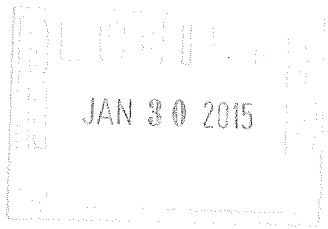
kristinmattk@gmail.com

28215

Optional Comment field:

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FIRST NAME:

LAST NAME:

Elizabeth

Conder

EMAIL:

ZIP:

sconder52@aol.com 28704

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Elizabeth Conroy  
E-mail address conroyliz@gmail.com  
ZIP Code 27705

Additional Comments:

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NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

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Name Heather Cook  
E-mail address heatherannecooke@gmail.com  
ZIP Code 27704

Additional Comments:

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NARAL  
Pro-Choice North Carolina Foundation

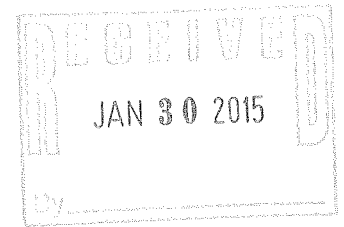


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FIRST NAME:

LAST NAME:

Gretchen

Cooley

EMAIL:

ZIP:

doesn't want to give

27712

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name GRETCHEN COOLEY  
E-mail address gcooley@nc.rr.com  
ZIP Code 27712

Additional Comments:

Please consider  
this seriously. It  
is the right thing  
to do.  
GC

Yes, I would like to receive updates from organizations supporting this comment:



NARAL  
Pro-Choice North Carolina Foundation



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Name Bonnie Cooper  
E-mail address bonniecooperphotography@yahoo.com  
ZIP Code 28816

Additional Comments:

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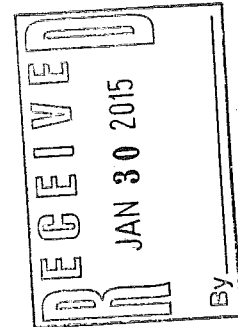
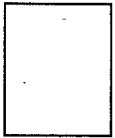
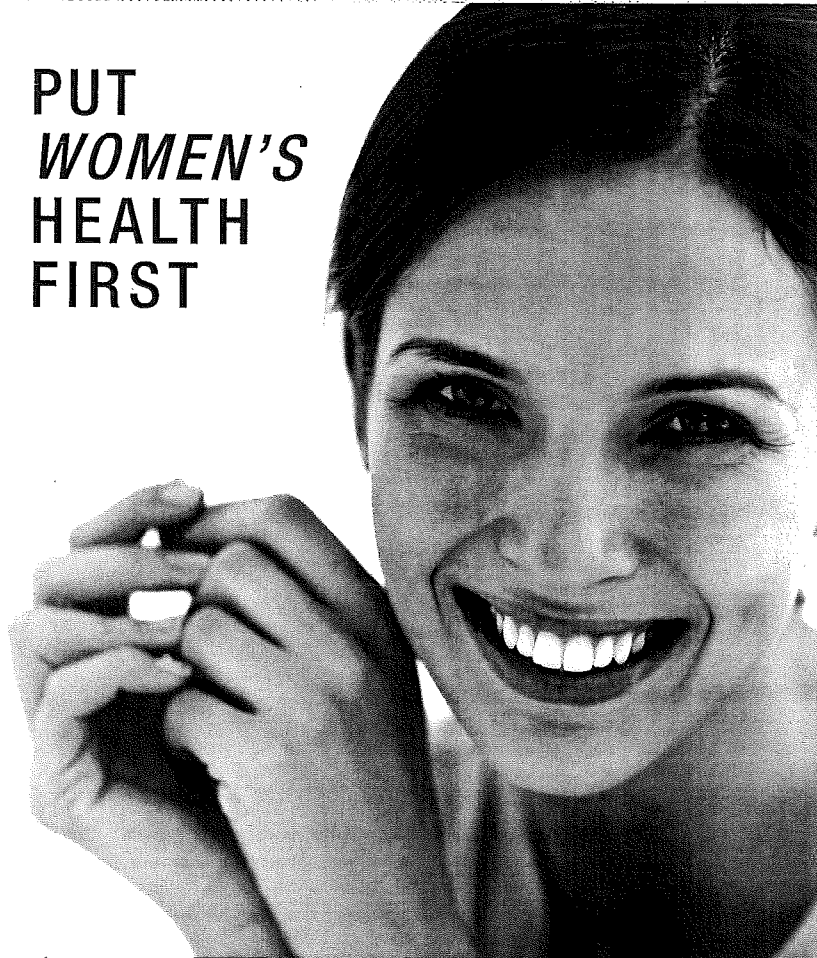
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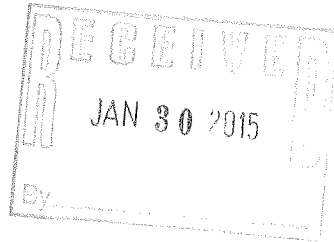
PUT  
*WOMEN'S*  
HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



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FIRST NAME:

*Somer*

LAST NAME:

*Cooper*

EMAIL:

*SomerLynnB@jeha.com*

ZIP:

*27606*

*Optional Comment field:*

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Ms. Debra L. Cooper  
111 E. Avon Pkwy.  
Asheville, NC 28804-1405

Ac

Mr. Laurence Weiss  
111 E Avon Pkwy.  
Asheville, NC 28804

Yes, I would like to receive updates from organizations supporting this comment:



NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

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Name Claudia Corletto  
E-mail address claudiacorletto@gmail  
ZIP Code 27603

Additional Comments:

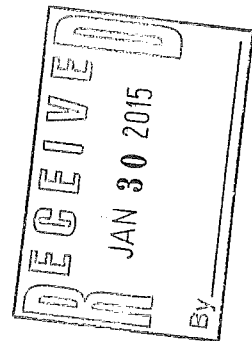
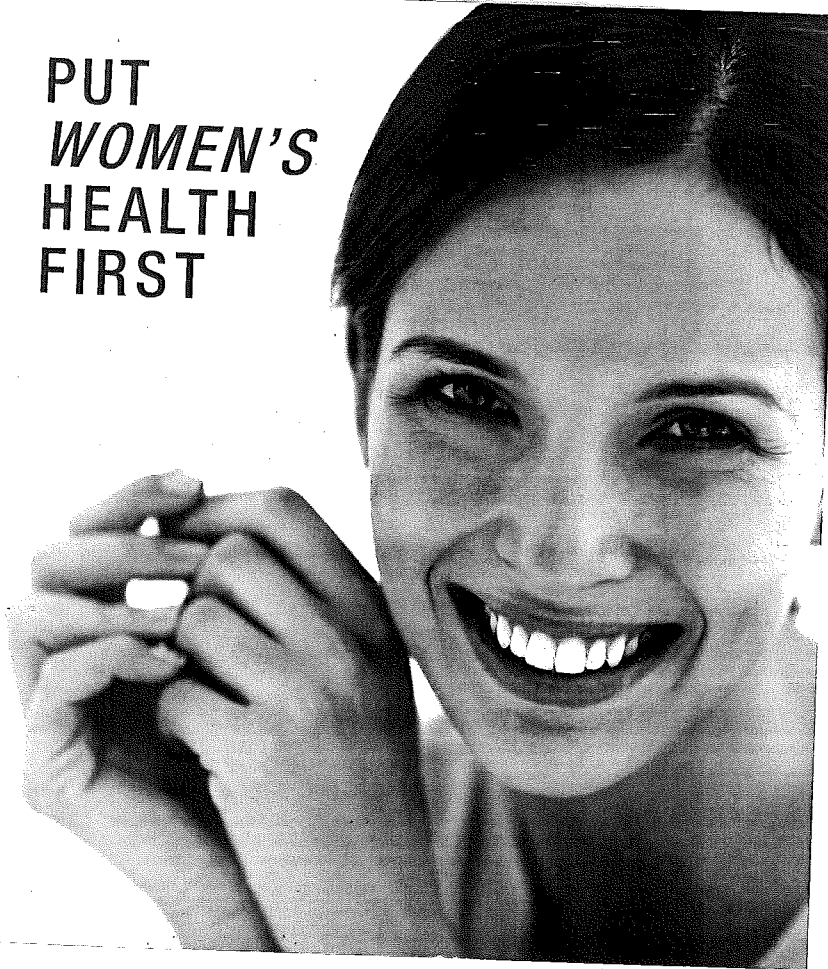
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 **Planned  
Parenthood\***  
Act. No matter what.

Planned Parenthood Action Fund of North Carolina

PUT  
WOMEN'S  
HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Josephine Corro  
E-mail address JoCorro09@gmail.com  
ZIP Code 27517

Additional Comments:

Having a child is a decision that will determine the rest of your life. Having an unwanted child due to lack of proper medical care is both a burden to the mother & society as a whole. I support a woman's right to choose.

Yes, I would like to receive updates from organizations supporting this comment:



NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

# TAKE ACTION!

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Name Sue Cottle  
E-mail address Muey10@gmail.com  
ZIP Code 27603

Additional Comments:

Yes, I would like to receive updates from organizations supporting this comment:

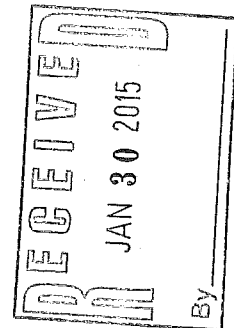
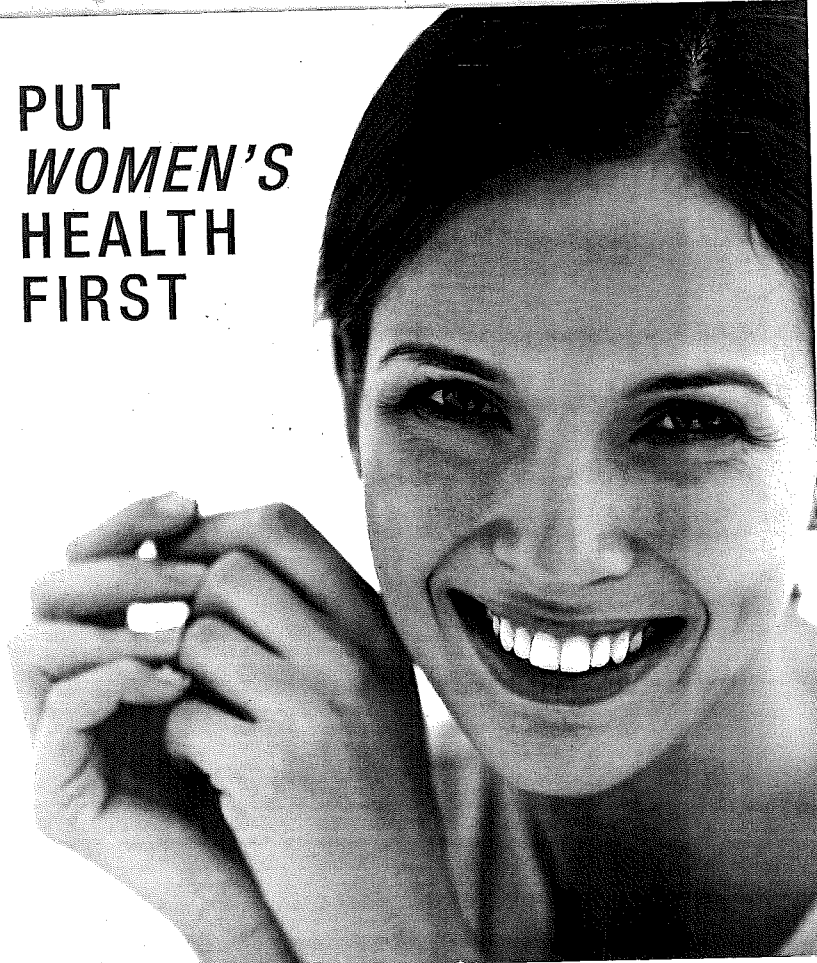


NARAL  
Pro-Choice North Carolina Foundation



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HEALTH  
FIRST

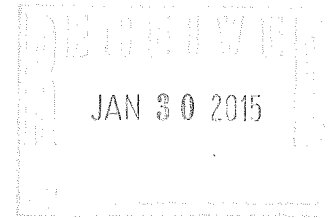


Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701





Planned Parenthood Health Systems  
Action Fund, Inc.



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FIRST NAME:

Shantal

LAST NAME:

Covington

EMAIL:

shantal.covington@mail.com

ZIP:

2

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Christina Cowger  
E-mail address CowgerChristina@gmail.com  
ZIP Code 27607

Additional Comments:

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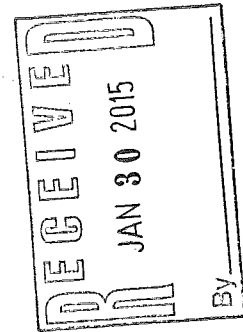
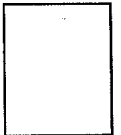
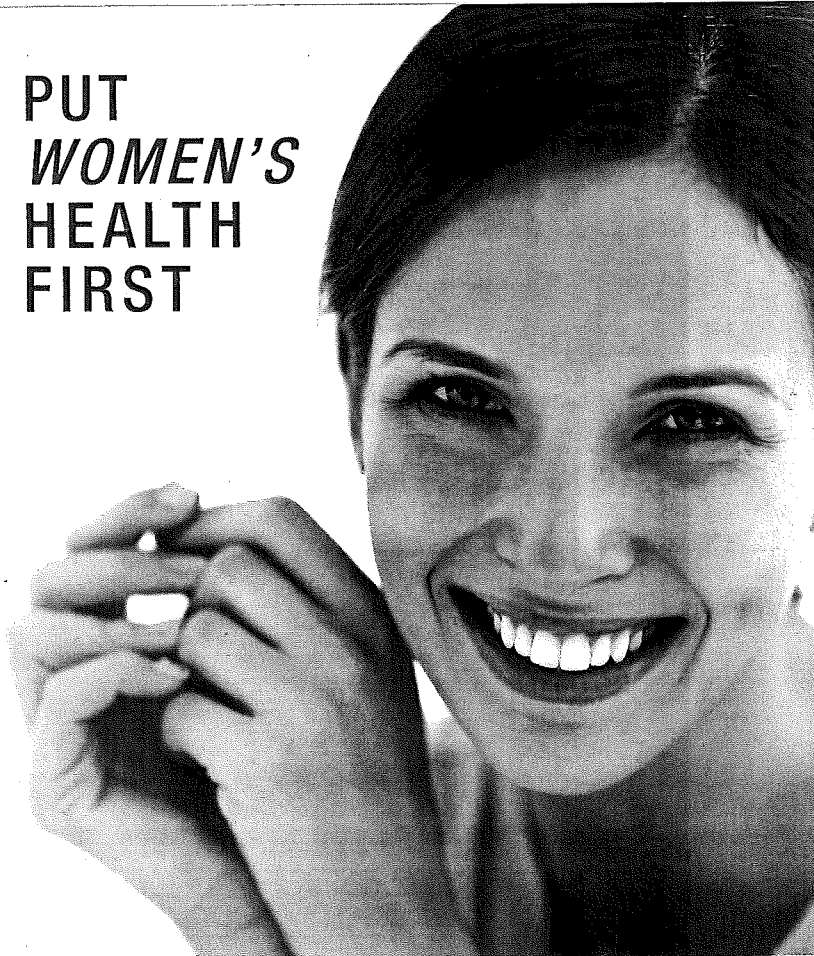
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Planned Parenthood Action Fund of North Carolina

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Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Robin Cox  
E-mail address gail.cox5@gmail.com  
ZIP Code 27713

Additional Comments:

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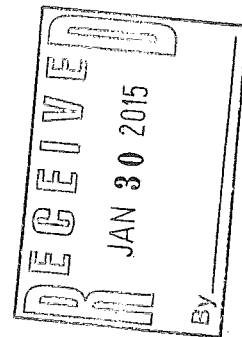
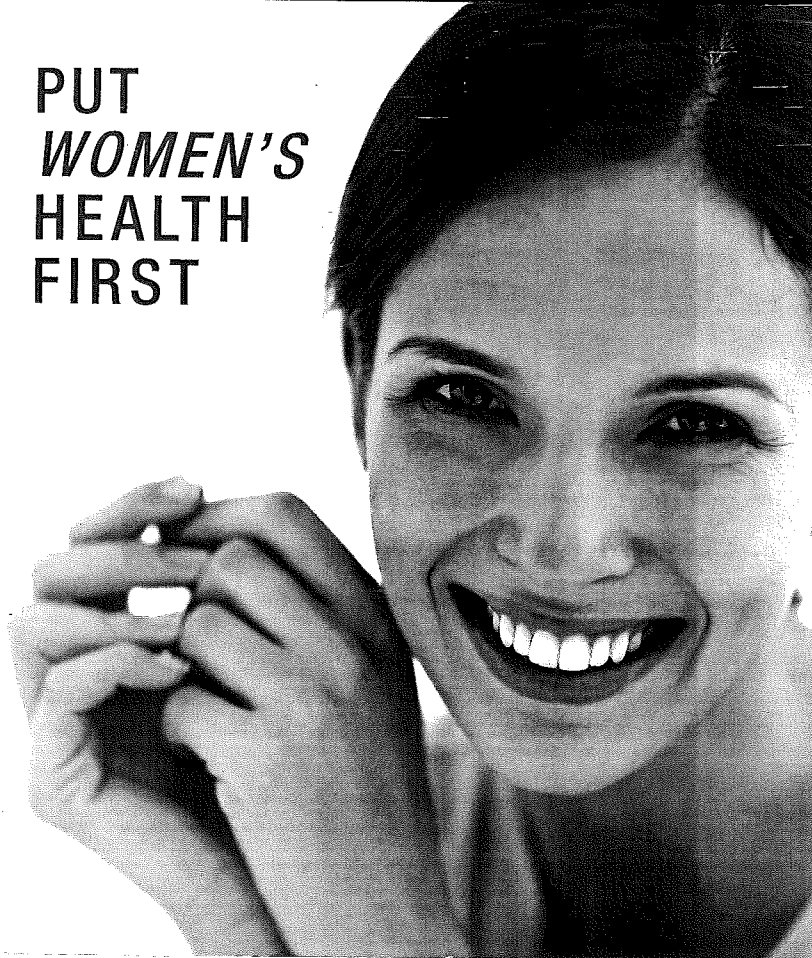
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 **NARAL**  
Pro-Choice North Carolina Foundation

 **Planned Parenthood**  
Act. No matter what.

Planned Parenthood Action Fund of North Carolina

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Name Bobby Cozart  
E-mail address bobby.cozart@cupertino.com  
ZIP Code 27704

Additional Comments:

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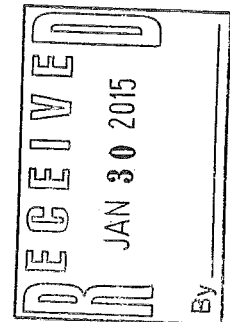
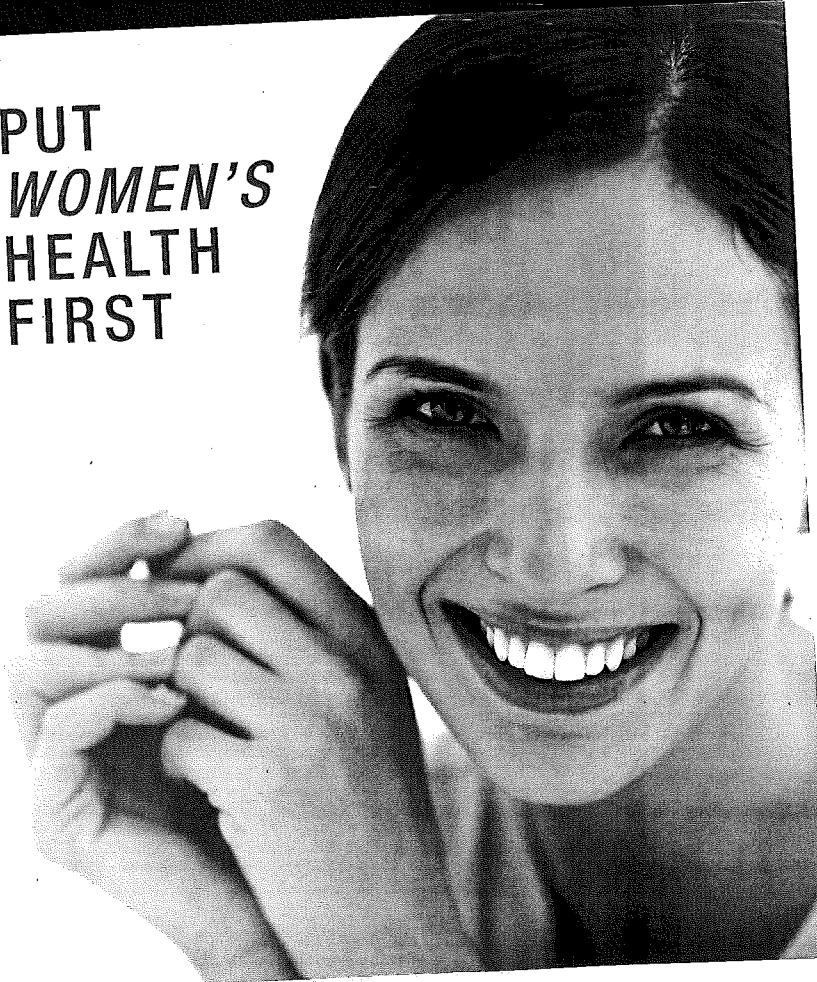
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Name Jerad Crave  
E-mail address jcrave@gmail.com  
ZIP Code 28803

Additional Comments:

Keep your policies  
away from women's  
bodies

Yes, I would like to receive updates from organizations supporting this comment:

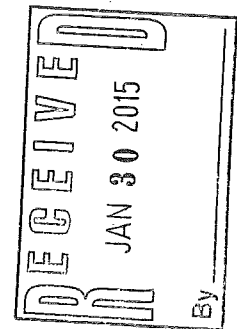
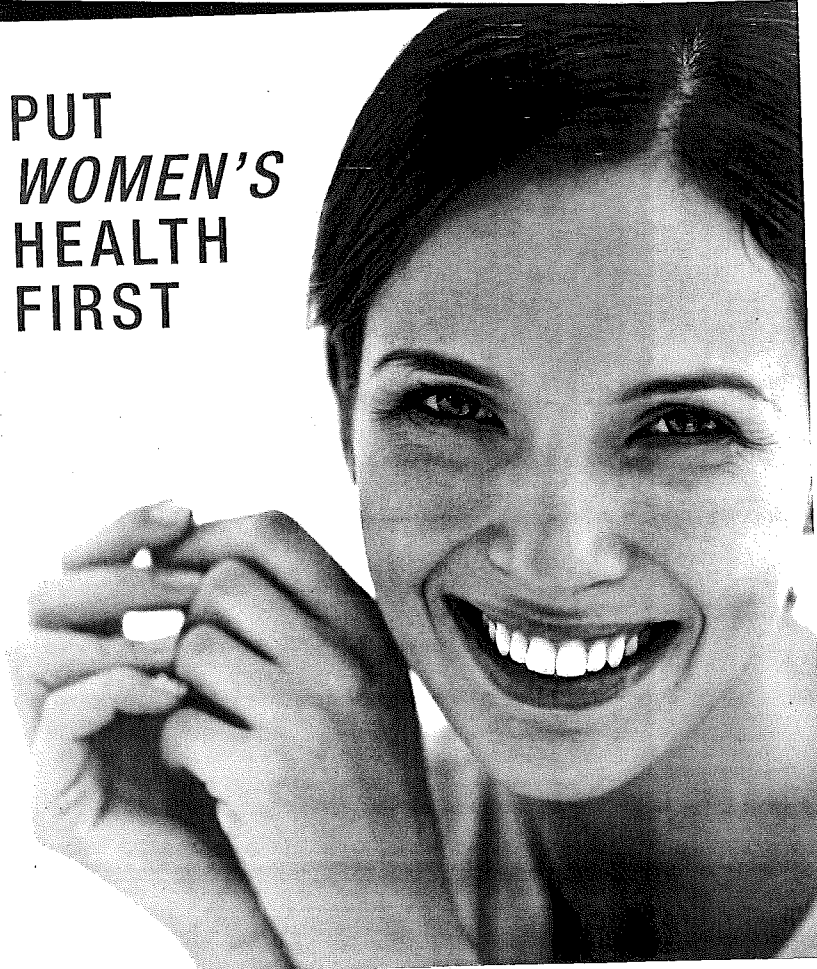


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Name Susannah Crawford

E-mail address scrawford@unc.edu

ZIP Code 27601

Additional Comments:

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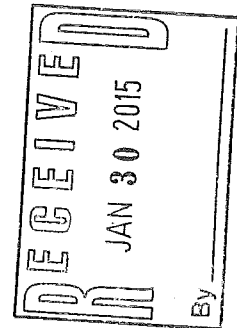
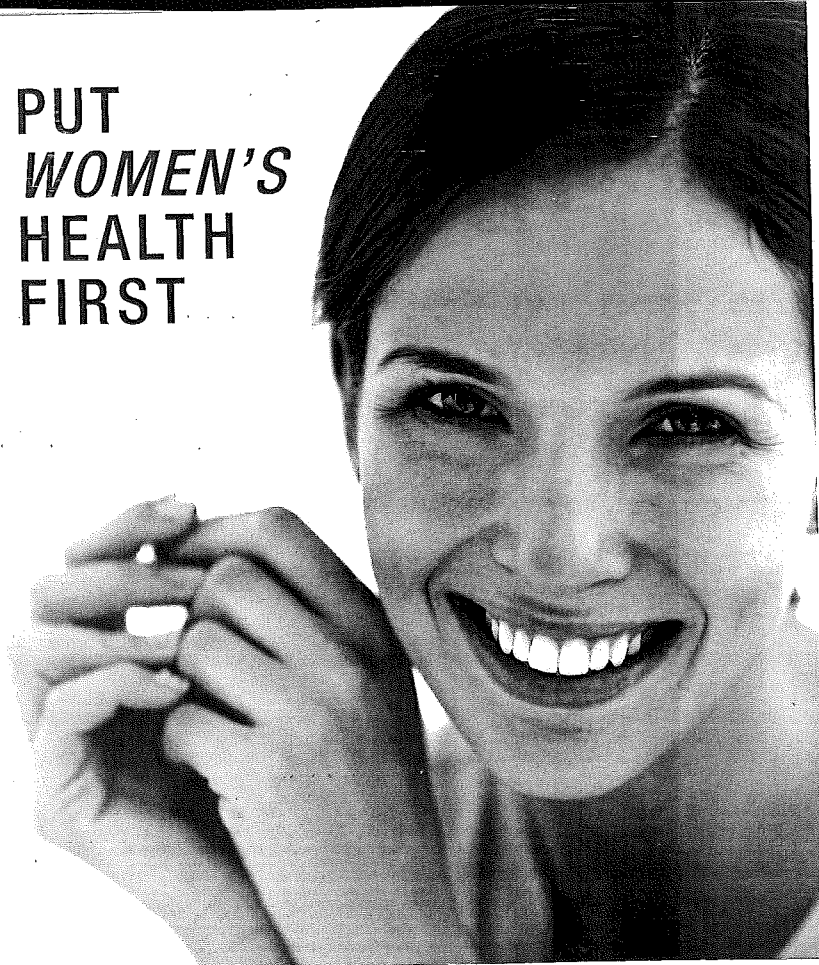


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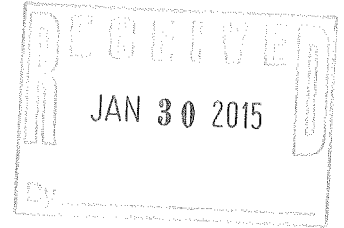
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FIRST NAME:

LAST NAME:

Jimmy Creech

EMAIL:

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jimmy.creech.nc@gmail.com 27603

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



Nadine Pfeiffer  
2701 Mail Service Center  
Raleigh, NC 27699-2701  
[DHRS.RulesCoordinator@dhhs.nc.gov](mailto:DHRS.RulesCoordinator@dhhs.nc.gov).

January 28, 2015

**VIA E-MAIL**

Re: Amendments to 10A NCAC 14E, Certifications of Clinics for Abortion Pursuant to Session Law 2013-366 § 4(c), Part IV

The Center for Reproductive Rights submits these comments in response to amendments to 10A NCAC 14E, Certifications of Clinics for Abortion (“the Proposed Rules”), authorized by Session Law 2013-366 § 4(c), Part IV. That statute requires the North Carolina Department of Health and Human Services (“DHHS”) to amend its rules pertaining to clinics certified by DHHS to be suitable facilities for the performance of abortions under G.S. 14-45.1, and authorizes DHHS to apply any requirement for licensure of ambulatory surgical centers to the standards applicable to clinics certified by DHHS to be suitable facilities for the performance of abortions. According to the statute, the rules must further ensure that standards for clinics certified by DHHS address the on-site recovery phase of patient care at the clinic, protect patient privacy, provide quality assurance, and ensure that patients with complications receive the necessary medical attention, while not unduly restricting access.

The Center for Reproductive Rights is a global legal advocacy organization that has successfully litigated cases for over 20 years, protecting the rights of women to access safe and legal abortion and other reproductive health care, including in North Carolina. We support proven and medically sound regulations that genuinely advance the public health and do not impose regulations on abortion providers not imposed on those providing similar health care. Our comments identify provisions in the Proposed Rules that we believe should be amended. Our suggested revisions are based on our experience working with local health departments to craft reasonable and medically sound regulations for abortion care providers, as well as the expertise of physicians and clinics in North Carolina, who have provided women with safe abortion services for decades. We appreciate the opportunity to comment on the Proposed Rules and look forward to working with DHHS on revising the Proposed Rules to ensure that women seeking abortion care in North Carolina receive high quality service, without the imposition of inappropriate and unduly restrictive requirements.

**I. Definition of Clinic (14E.0101(2))**

The term “clinic” is defined to mean a freestanding facility for the performance of abortions “completed” during the first 20 weeks of pregnancy. 10A NCAC § 14E.0101(2). The term



“completed” has been added to the definition, though that addition it is not necessary to abide by the terms of the enabling statute. Session Law 2013-366 § 4(c), Part IV requires DHHS to amend its rules pertaining to clinics certified by the DHHS to be suitable facilities for the performance of abortions under G.S. 14-45.1. The language of G.S. 14-45.1 states:

[I]t shall not be unlawful, during the first 20 weeks of pregnancy, to advise, procure, or cause a miscarriage or abortion when the procedure is performed by a physician licensed to practice medicine in North Carolina in a hospital or clinic certified by the Department of Health and Human Services to be a suitable facility for the performance of abortions.

N.C. Gen. Stat. Ann. § 14-45.1. Based on the language in the statute, the term “completed” need not be added to the definition of “clinic” to comply with the statute; rather, it unduly restricts doctors who begin a procedure that, due to the duration of the procedure or the need to transfer a patient to a hospital setting, is not completed at the clinic itself within 20 weeks. This restriction creates unnecessary confusion in contravention of the enabling statute.

Recommendation: The term “completed” should be deleted.

## II. Inspections (14E.0111)(e) and (f)

The provision addressing inspections provides for immediate access to clinics without any indication that inspections must take place during business hours and without placing any limitations on access to patients’ personal information, in contravention of the mandate of the enabling statute that DHHS protect patient privacy and not unduly restrict access to clinics. The provision states:

An inspection shall be considered whenever the purpose of the inspection is to determine whether the clinic complies with the rules of this Subchapter or whenever there is reason to believe that some condition exists which is not in compliance with the rules of this Subchapter. The clinic shall allow the Division to have immediate access to its premises and the records necessary to conduct an inspection and determine compliance with the rules of this Subchapter.

10A NCAC § 14E.0111(e)-(f). This provision does not limit inspections to clinics’ business hours, though off-hours inspections are burdensome to clinic owners and staff, particularly since the provision provides for “immediate access” to the premises and therefore does not provide an opportunity for clinic owners and staff to arrange after-hours staffing. The provision further requires the facility to give DHHS employees access to the facility and to patient medical records and patient lists at any time, without appropriate protection for patient confidentiality. Allowing inspectors to review unredacted medical records violates patients’ confidentiality. All patients have an expectation of privacy in their medical records, which is protected by both medical ethics<sup>1</sup>

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<sup>1</sup> See AMA, Code of Medical Ethics, Opinion 5.05 Confidentiality (2010), available at <http://www.ama-assn.org/ama/pub/physician-resources/medical-ethics/code-medical-ethics/opinion505.page?>.

and law.<sup>2</sup> Confidentiality is of paramount importance to patients and abortion providers. Patients are targeted for harassment outside of clinics, and there is a history of anti-abortion activists seeking patient information in order to deter women from seeking abortion care. Patients have a right to expect that their private, medical information, particularly their identifying information, will remain confidential – in fact, a federal court has held that “giving [a state department of health] unbounded access to unredacted patient records violates the informational privacy rights of patients.” *Tucson Woman's Clinic v. Eden*, 379 F.3d 531, 553 (9th Cir. 2004).

Recommendation: Pursuant to the requirement that the rules protect patient privacy, we urge you to ensure that the permanent regulations provide the highest levels of protection for patient records. In particular, the regulations should allow DHHS representatives to inspect patient records only after they have been redacted of any potentially identifying patient information, giving health care facilities a reasonable time to redact the records. Time should similarly be provided to redact any copies of records removed from the clinic. Further, we urge you to limit inspection times to clinic business hours.

### **III. Emergency Back-Up Services (14E.0301)**

Proposed Rule 10A NCAC § 14E.0301 requires a written plan for transfer of emergency cases, suitable procedures, personnel, and equipment, and a written agreement with a nearby hospital to facilitate the transfer of patients or documentation of efforts to establish such a transfer with a hospital that provides emergency services and inability to do so. Although we do not object to the provision as drafted, we note that obtaining a documented transfer agreement with a nearby hospital is medically unnecessary. Federal law requires hospitals to admit patients in an emergency: Under the Emergency Medical Treatment and Labor Act (EMTALA), 42 U.S.C. § 1395(dd) (2003), if a person comes to a hospital's emergency department with an emergency medical condition, the hospital is required to treat and stabilize the patient or transfer the patient to another facility. Therefore, it is not necessary for individual health care providers to arrange transfer agreements with local hospitals, as those hospitals are already bound by law to accept patients in emergency cases.

### **IV. Surgical Services (14E.0311)**

This provision unnecessarily restricts the use of procedure rooms. The provision states that: “The procedure room shall be maintained exclusively for abortion procedures.” The term “abortion procedure” replaced the term “surgical procedure.” *See* 10A NCAC § 14E.0311. This change means that only surgical abortion procedures may be performed in the procedure rooms. There is no medical advantage to preventing clinics from performing other medical procedures in procedure rooms. In contrast to the complicated, invasive surgical procedures generally performed in outpatient surgical facilities, first-trimester abortion, is a simple, non-invasive surgical or medical procedure that is typically provided in office-based settings. The same holds even more true in the context of medication abortion, where an oral medication is dispensed to the patient in the health center. Because the provision of safe abortion services will not be implicated by

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<sup>2</sup> *See* HIPAA, 42 U.S.C. §§ 1320d *et seq.*

allowing other procedures to also be performed in the procedure rooms, the rule should be rewritten to clarify that other medical procedures may be performed.

Recommendation: We recommend that DHHS replace the term “abortion procedure” with the term “medical procedures.”

### Conclusion

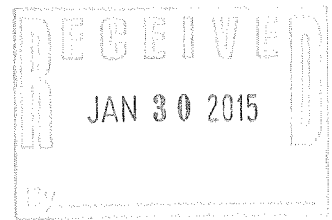
Thank you for the opportunity to submit comments in response to the Proposed Rules. Please do not hesitate to contact us if you would like further information.

Sincerely,



Janet Crepps\*  
Senior Counsel, U.S. Legal Program  
Center for Reproductive Rights  
120 Wall Street, 14<sup>th</sup> Floor  
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FIRST NAME:

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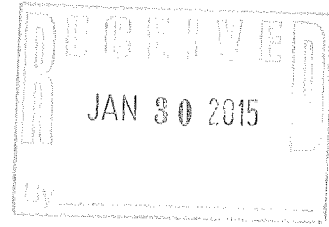
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FIRST NAME:

LAST NAME:

Retta

Crosson

EMAIL:

ZIP:

rlou424@att.net

27615

*Optional Comment field:*

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Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Caroline Crowley

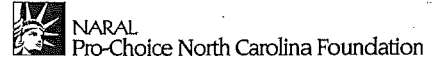
E-mail address \_\_\_\_\_

ZIP Code 2807

Additional Comments:

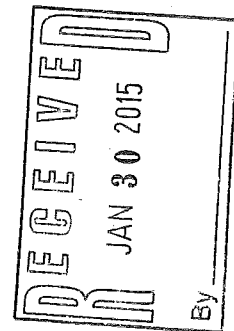
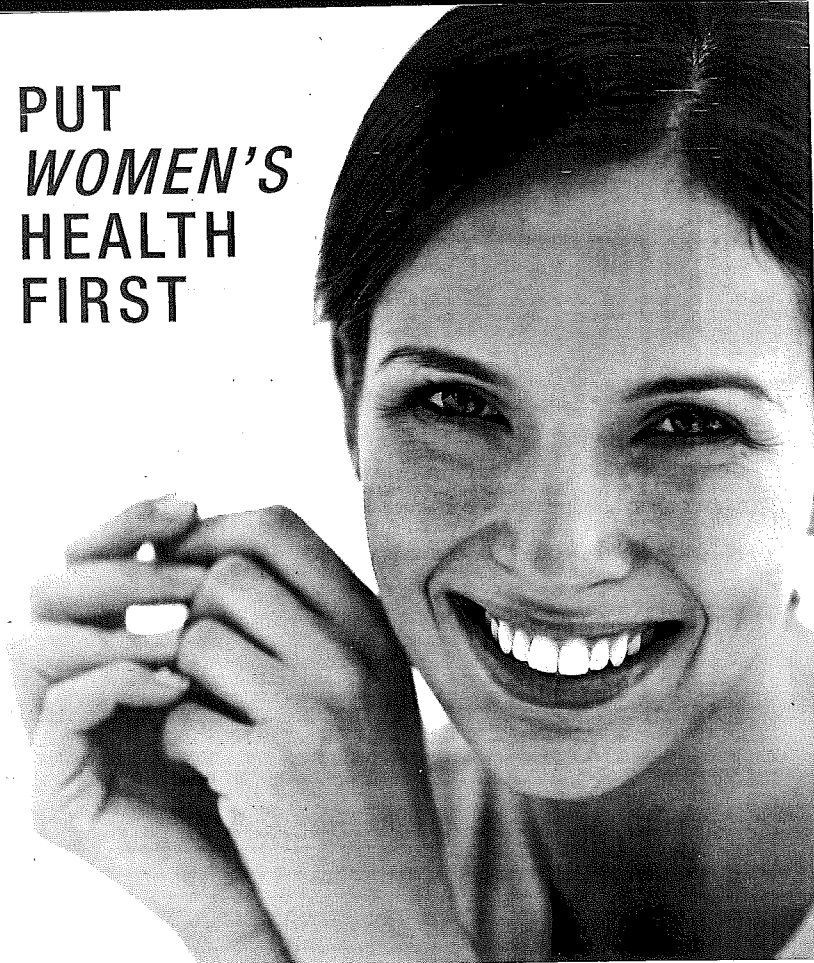
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Yes, I would like to receive updates from organizations supporting this comment:



Planned Parenthood Action Fund of North Carolina

PUT  
WOMEN'S  
HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

# TAKE ACTION!

Tell the Department of Health & Human Services:  
Put Women's Health First

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Name Val Cruchan  
E-mail address vcruchan@unca.edu  
ZIP Code 28804

Additional Comments:

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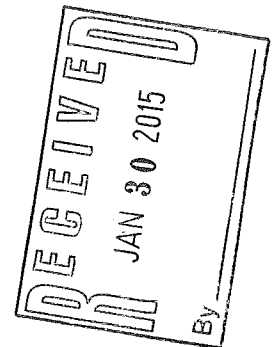
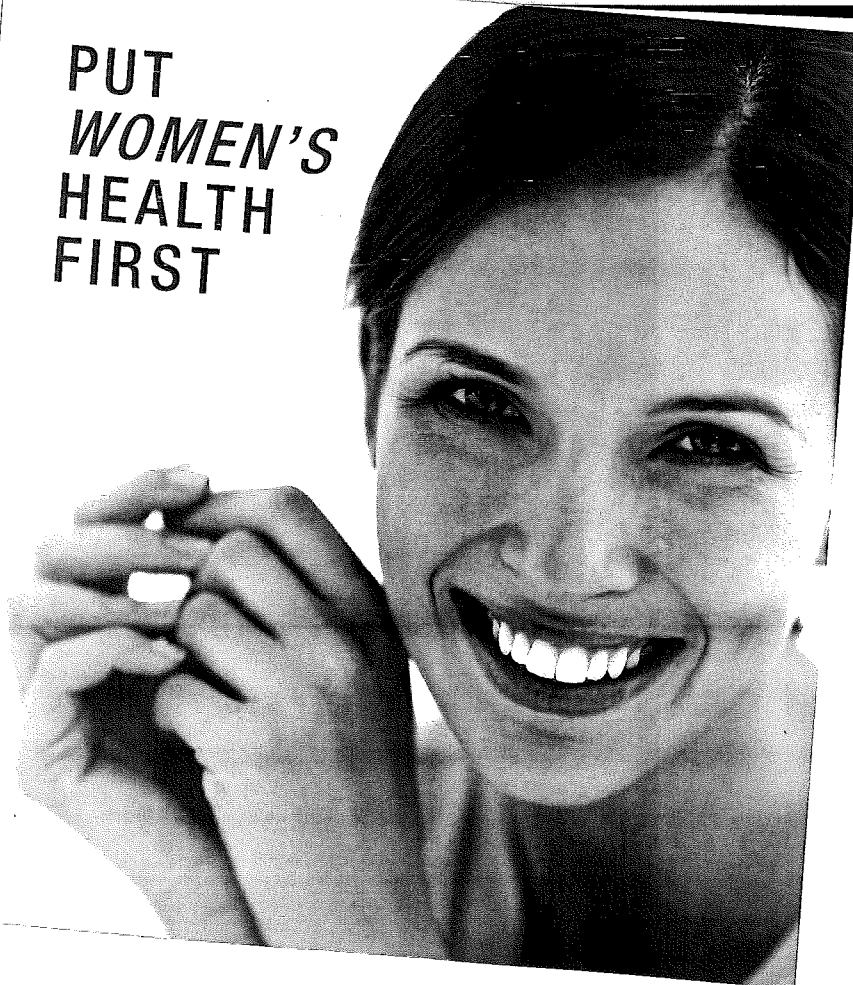
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Act. No matter what.

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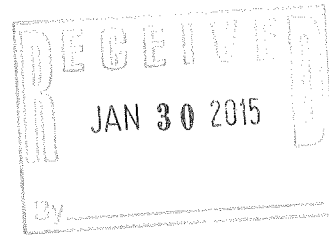
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Planned Parenthood Health Systems  
Action Fund, Inc.



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FIRST NAME:

LAST NAME:

Brie

Crumbly

EMAIL:

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Crumbly@email.nc.rrh.org 7607

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC





North Carolina Department of Health and Human Services  
Division of Health Service Regulation  
Office of the Director

Pat McCrory  
Governor

Aldona Z. Wos, M.D.  
Ambassador (Ret.)  
Secretary DHHS  
  
Drexdal Pratt  
Division Director

**MINUTES OF PUBLIC HEARING**  
**DECEMBER 19, 2014**  
**10:00 A.M.**

**Staff Present:**

1. Drexdal Pratt, Director, Division of Health Service Regulation
2. Nadine Pfeiffer, Rule-making Coordinator, Division of Health Service Regulation
3. Azzie Conley, Chief, Acute and Home Care Licensure and Certification Section, Division of Health Service Regulation
4. Cheryl Ouimet, Chief Operating Officer, Division of Health Service Regulation
5. Patricia Christian, Assistant Director for Healthcare Quality and Safety, Division of Health Service Regulation
6. Diana Barbry, Executive Assistant, Division of Health Service Regulations
7. Kevin Howell, Legal Communications Coordinator, Office of Communications
8. Dan Guy, Communications Project Manager, Office of Communications
9. Olivia James, Press Assistant, Office of Communications

**Others Present:**

See the attached sign-in sheet for attendance.

**1. Purpose of Hearing**

The purpose of this public hearing was to solicit verbal and /or written comments from the public on the proposed amendment and adoption of rules in Chapter 10A NCAC 14E, Certifications of Clinics for Abortion, as published in the NC Register, Volume 29 Issue 11, issued on December 1, 2014 for these rules as listed: 10A NCAC 14E .0101, .0104, .0109, .0111, .0201, .0202, .0206, .0207, .0302 - .0311, .0313, and .0315.

**2. Hearing Summary**

The public hearing was opened by Drexdal Pratt at 9:00 a.m. A total of fourteen speakers spoke at the hearing. A summary of these comments is as follows:



<http://www.ncdhhs.gov/dhsr/>

Phone: 919-855-3750 / Fax: 919-733-2757

Location: 809 Ruggles Drive v Dorothea Dix Hospital Campus v Raleigh, N.C. 27603

Mailing Address: 2701 Mail Service Center • Raleigh, North Carolina 27699-2701

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- 1) Deborah Walsh, Executive Director, Family Reproductive Health, Charlotte NC, stated that she was a part of the work group that reviewed and developed the rule changes. She spoke on the diversity of the work group and how they worked together to provide the regulations based on medical reasons to ensure the well-being of patients seeking these services.
- 2) Dr. David Grimes, a board certified OB-GYN physician, previous CDC Abortion Chief and WHO Abortion Chairman, urged the adoption of the proposed rules because they were evidence-based and stated that the scientific process by which the rules were developed must not be degraded by special interest groups with no relevant medical expertise.
- 3) Dr. Gretchen Stuart, Medical Director, Planned Parenthood of NC, stated that abortion is extremely safe and that abortion has a complication rate of less than 1 percent. She also stated that abortion is very common and that one in three women will have an abortion by the time she is 45. She also stated that safety and excellent care is top priority, and that access to safe and legal abortion is vital for her patient's safety and well-being. She requested that the final regulations remain free of legislative interference in medical practice.
- 4) Dr. Amy Bryant, a board certified OB-GYN physician, NARAL Pro Choice, stated that one in three women will have an abortion. She stated that when the government regulates abortion it is critical that the regulation preserve access and policy makers should never impose regulations on women to stop abortion. She stated that the regulations should be grounded on medical reasons.
- 5) Dr. Dalia Brahmi, OB-GYN physician, Chapel Hill, stated that abortion is safe and very common, and also stated that one in three women will have an abortion in their lifetime. She stated that every woman is unique and every situation is different, and that we all have to make health decisions we never expected to make. She shared a story about a patient and her decision to have an abortion, and she also stated that what is most important to her is that her patients have the ability to make their own personal medical decisions that are best for their health and well-being. She said medical doctors will always support regulation for patient's safety.
- 6) Dr. Marcela Smid, OB-GYN Physician, Chapel Hill, who specifically takes care of patients with high risk pregnancies. She stated that as a physician her first priority is the safety of her patients and stated studies show abortion extremely safe with a complication rate of less than 1 percent. She shared a story about a patient who had to terminate her pregnancy due to complications with her pregnancy. She stated that her patients deserved safe and compassionate care. She urged DHHS to reject any medically unnecessary regulations that are designed to restrict safe abortion care because adding unnecessary regulations that are not medically necessary could have dangerous effects to the safety of patients by delaying services or closing clinics.
- 7) Heather Shumaker, State Policy Director, National Abortion Federation (NAF), stated while additional regulations are unnecessary she commended DHHS on the process based on medicine and science. She said abortion care was one of the safest types of procedures. She stated that she hopes the process does not become politicized and would continue to use evidence-based input from the medical community throughout the process.
- 8) Suzanne Buckley, Executive Director, NARAL Pro Choice stated that reproductive health care decisions should be made by the patients and their doctors and not the politicians of North Carolina. She further stated that at NARAL Pro Choice, patients' health comes first. Senate Bill 353, which created the law requiring these rule changes, was enacted with a single goal and that was to prevent women from having safe and legal abortions in North Carolina. These laws have been enacted in

many states across the country, and the enactment of these laws has caused many safe abortion facilities to close their doors and affected patient care and safety in those states. She stated that abortion care is one of the safest types of medical care sought in this country. She stated that there is no medical basis or need for the changing of these rules required by this law. She recognized the department engaged in a thoughtful, reasonable process by consulting with experts to ensure safe abortion care. She stated, in general, the regulations were based on sound medicine and science. She, and the thousands she represents, request that DHHS only make rule changes that ensure medical standards recommended by medical experts.

9) Sarah Preston, Policy Director, ACLU, noted that her organization was dedicated to protecting the safety and health care of patients, including abortion. She said that during the legislative debate both Secretary Wos and Governor McCrory stated any new rules should be based on patient safety. She said the rule changes focused on the well-being of patients and hoped that the Department's focus would remain on safety and not politics.

10) Nancy Curtis, retired Lutheran Pastor and attorney, Asheville NC, stated women's health was regulated on evidence-based information. She urged DHHS to make every effort to make least restrictive regulations and only consider medical based information for the safety of North Carolina women.

11) Kelsea McLain gave a testimony about her personal experience with abortion, stating that she was glad that she was able to make her own decision on medical care and the decision was not based on political considerations. She stated the rules were medical-based. She urged DHHS not to make rule changes that did not make sense.

12) Wendy Banister, Executive Director, Gateway Women, stated that 60 percent of their clients with abortions have reported emotional difficulty and regret, while only 34 percent of their patients reported that abortion was a good decision for them. She gave an overview of situations with patients at Gateway. She felt that the standards fall short and we should be requiring the very best for women's health in North Carolina.

13) Tammy Fitzgerald, NC Values Coalition spoke in opposition of the rules stating rules are important for health and safety for women seeking abortions. She said that the timing of the rules coming out the week before Christmas was a ploy to deceive the public and to sweep the changes under the rug. She stated the process was biased because the group that came up with the proposals only included one person with an anti-abortion viewpoint. She said the resulting proposals are inadequate to protect women. She stated the rules did not include requirements from the model rules by NAF. She gave an overview of specific problems with the rules, which included:

- No requirement for an anesthesiologist or CRNA to administer anesthesia;
- No requirement for the abortion doctor to be an OB-GYN board-certified physician;
- Certification lacking on licensing procedures;
- No agreement or relationship for second OB-GYN physician in case of emergency;
- No requirement for annual inspections, they are only allowed;
- Post-op discharge are lacking, there is no follow-up exam required;
- One-hour observation post procedure has been removed;
- Eliminated requirement for examination of products of conception to ensure complete abortion;
- No requirement for hospital admitting privileges for physicians;

- Transfer agreement is neutered, as long as they attempt to get one they have satisfied the requirement;
- No minimum number of nurses at clinics;
- Allow minors to work at clinic;
- No requirements for materials to be clean, sterile and in good working order;
- No requirement for prior physical exam;
- Reporting requirements are lacking and there are no penalties for violations.

She stated there is a need for penalties to have teeth in the rules. She also stated that minimum standards for safety are ethical and logical, and these rules fall short.

14) Jere Royall, Counsel, NC Family Policy Council, stated that the Council is appreciative of the proposed rule changes, which are the first in almost 20 years. However, the proposed rule changes fail to address some critical issues that NCFPC thinks are vital to women's health and safety. He stated that a primary need is for the rules to require annual inspections of abortion clinics for the safety and well-being of the patients.

These comments will be taken into consideration by the Agency. The hearing was adjourned at 9:52 a.m.

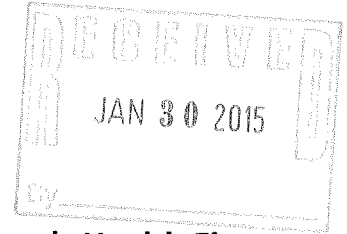
Respectfully submitted,



Nadine Pfeiffer,  
Rule-making Coordinator  
January 22, 2015



Planned Parenthood Health Systems  
Action Fund, Inc.



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FIRST NAME:

Mariah

LAST NAME:

Dahill-Moore

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27705

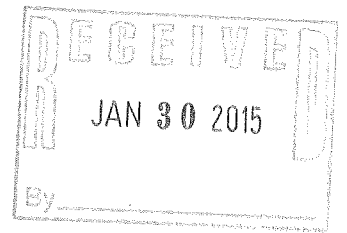
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FIRST NAME:

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27606

Optional Comment field:

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Name Kenneth Dalshemmer  
E-mail address Kdalsh@earthlink.net  
ZIP Code 27707

Additional Comments:

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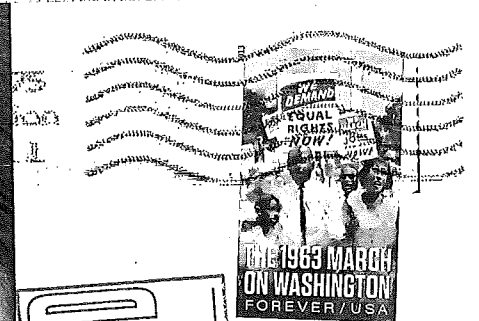
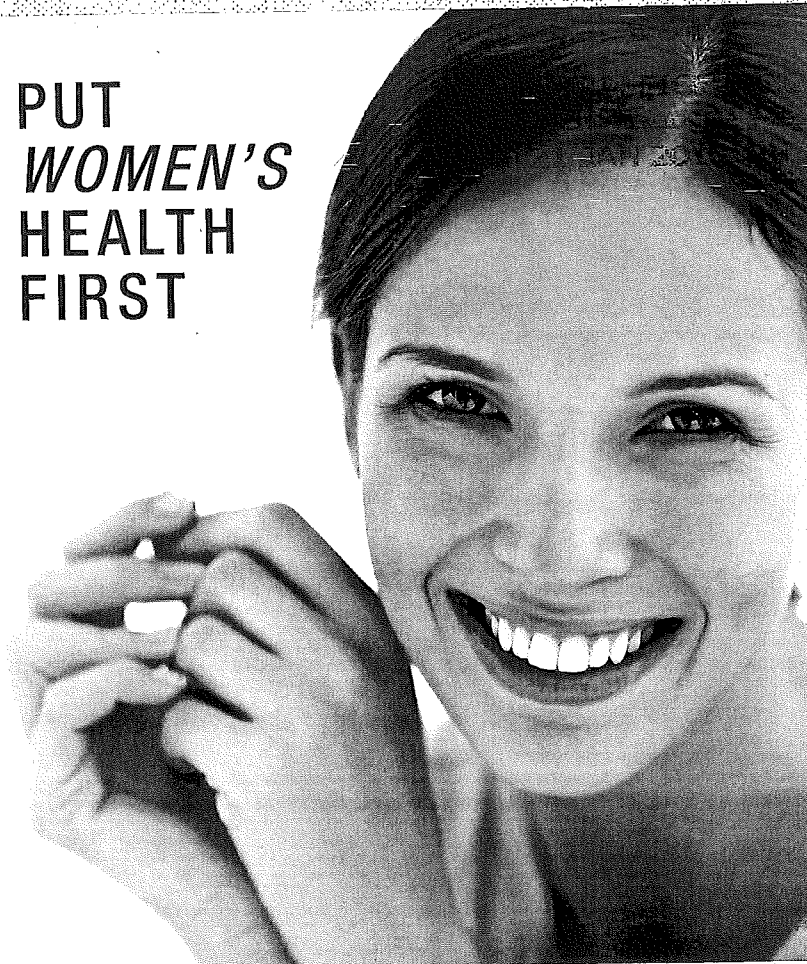
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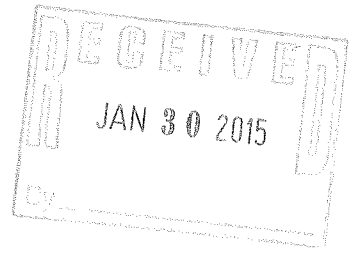
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## PUT WOMEN'S HEALTH FIRST



RECEIVED  
JAN 23 2015  
By

Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



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FIRST NAME:

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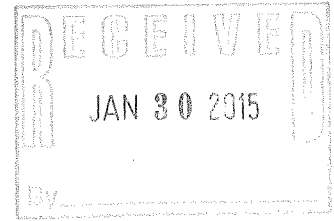
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FIRST NAME:

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jilliany.daly@gmail.com 27514

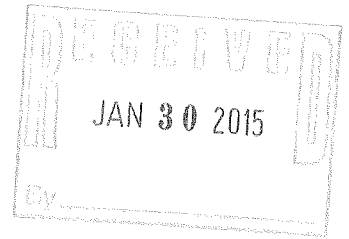
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FIRST NAME:

LAST NAME:

Taylor Daly

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taylorredaly@gmail.com 28804

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Name Kamiya Nicole Dancy  
E-mail address Kdancy1@outlook.com  
ZIP Code 27701

Additional Comments:

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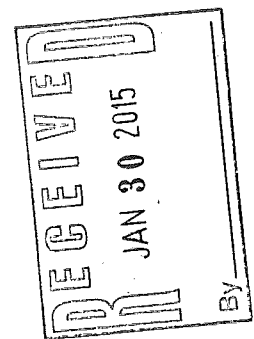
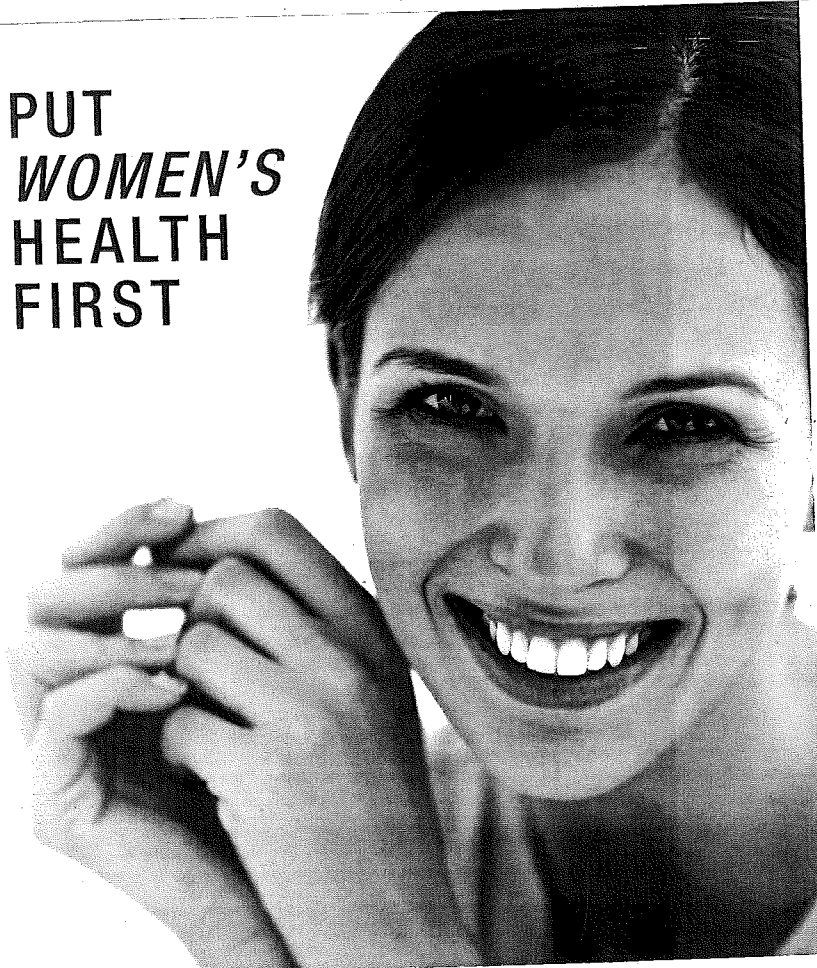
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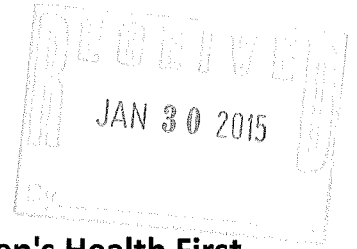
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2701 Mail Service Center  
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FIRST NAME:

Susana

LAST NAME:

Dancy

EMAIL:

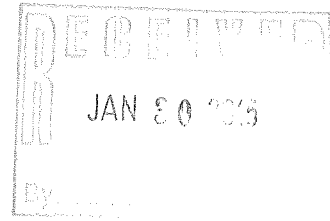
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*Optional Comment field:*

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FIRST NAME:

LAST NAME:

Natalie

Dantonio

EMAIL:

ZIP:

nataliemarie.dantonio@gmail.com 28806

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

# TAKE ACTION!

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Name Camryn Darragh  
E-mail address darragh.camryn@gmail.com  
ZIP Code 27607

Additional Comments:

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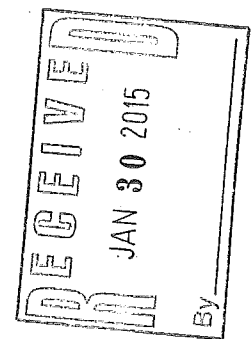
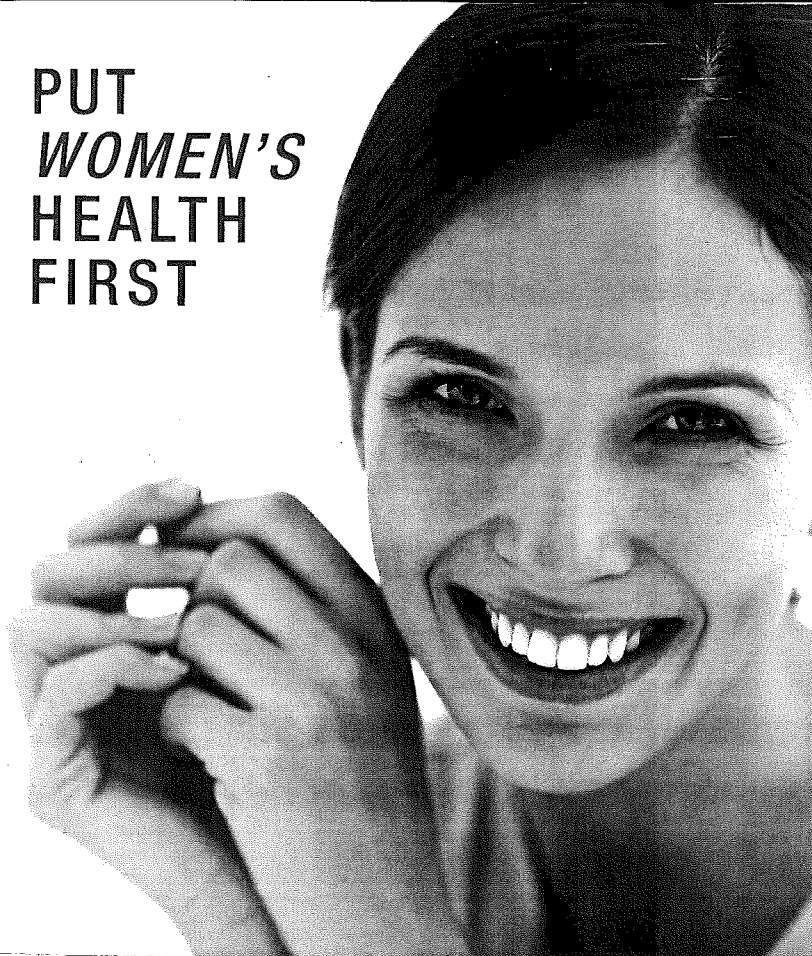
Yes, I would like to receive updates from organizations supporting this comment:

 **NARAL**  
Pro-Choice North Carolina Foundation

 **Planned Parenthood**  
Act. No matter what.

Planned Parenthood Action Fund of North Carolina

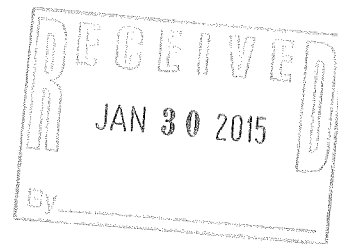
**PUT  
WOMEN'S  
HEALTH  
FIRST**



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



Planned Parenthood Health Systems  
Action Fund, Inc.



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FIRST NAME:

Ann

LAST NAME:

Dasher

EMAIL:

ann.roberts@windspring.com

ZIP:

28704

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Blaise Deub

E-mail address \_\_\_\_\_

ZIP Code 28384

Additional Comments:  
F U GUYS! >:(

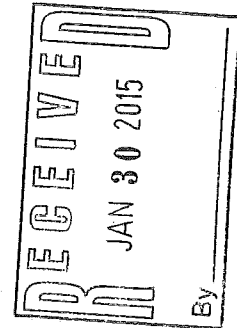
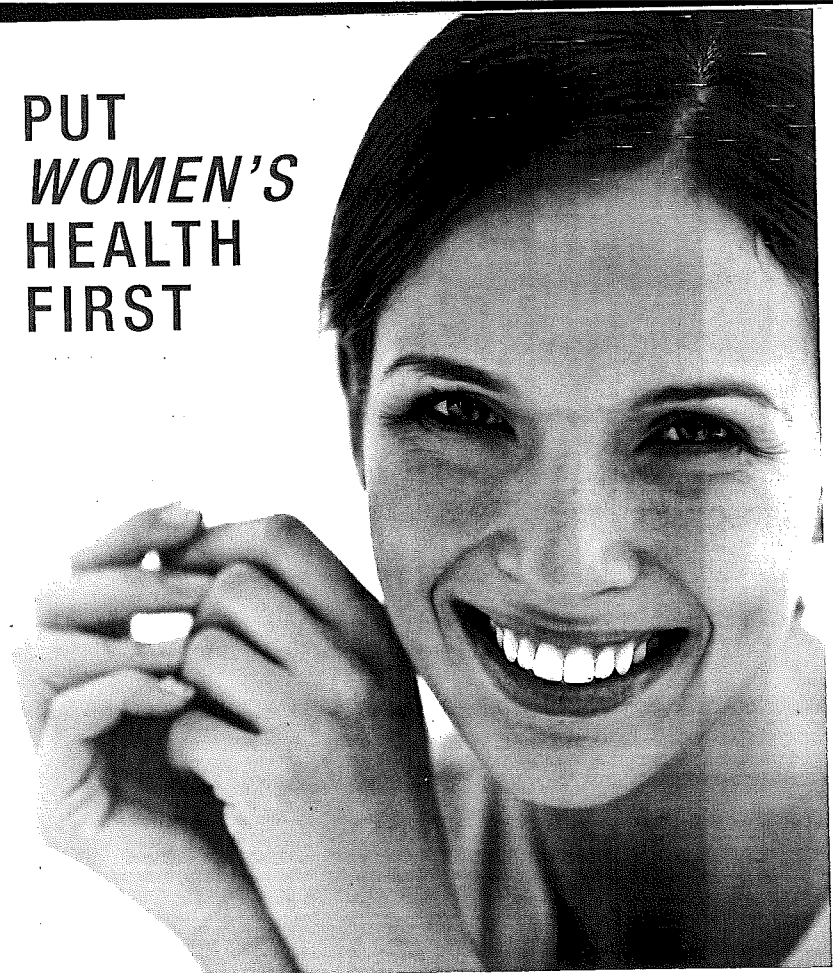
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Planned Parenthood Action Fund of North Carolina

**PUT  
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HEALTH  
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Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



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Name Amy Daugherty  
E-mail address adaugherty@unca.edu  
ZIP Code 28778

Additional Comments:

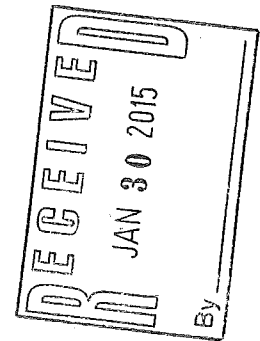
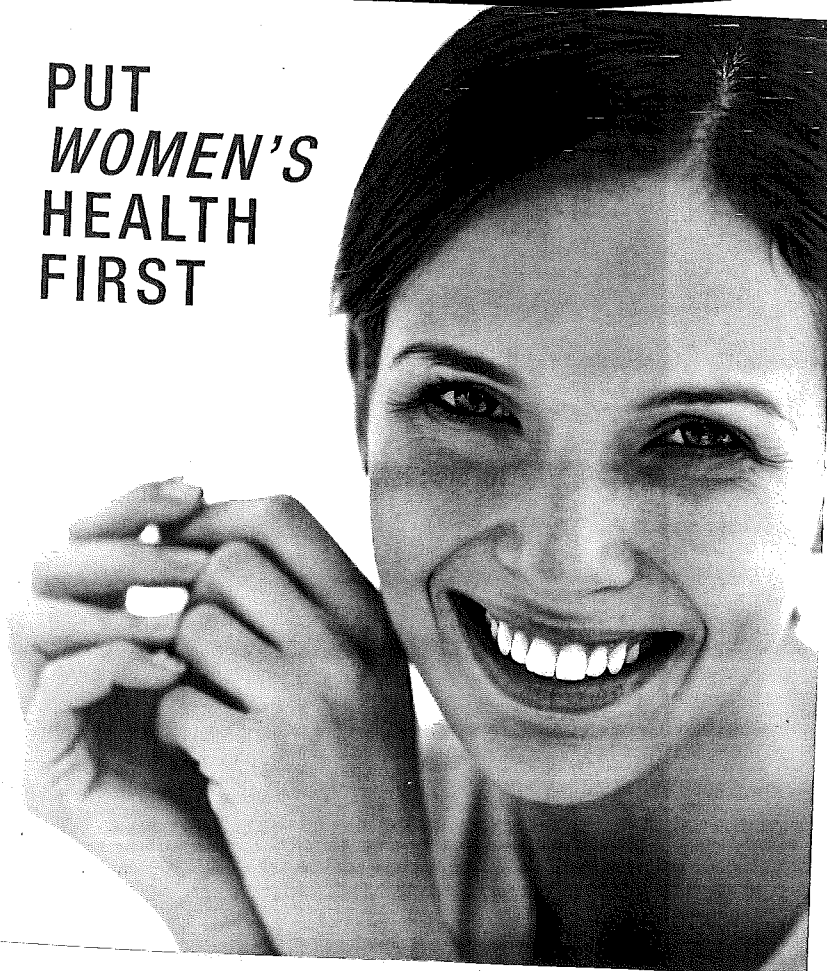
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Name Shayna Davis  
E-mail address davisshayna10@gmail.com  
ZIP Code 27612

Additional Comments:

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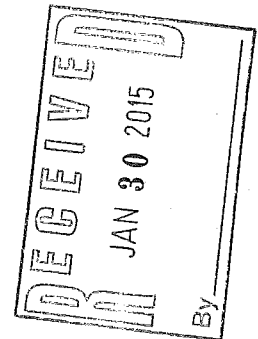
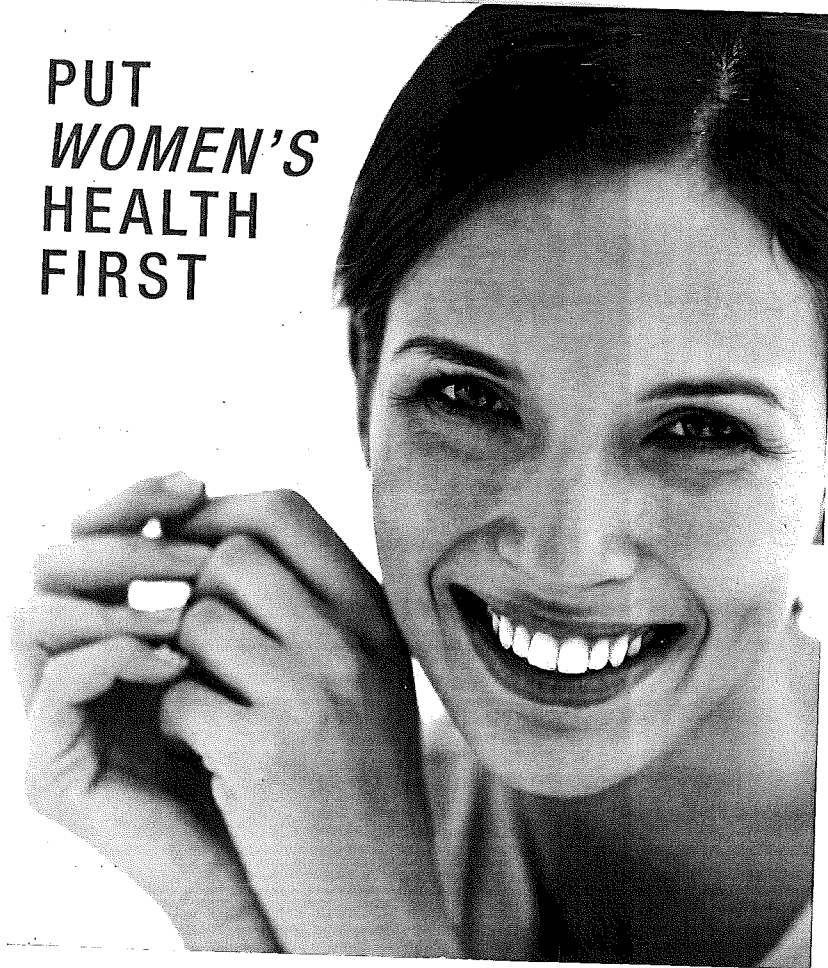


NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

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Name Claire Davis  
E-mail address claire.davis42@gmail.com  
ZIP Code 27586

Additional Comments:

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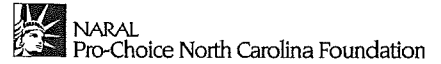
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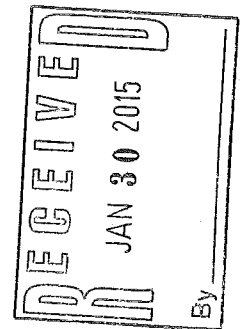
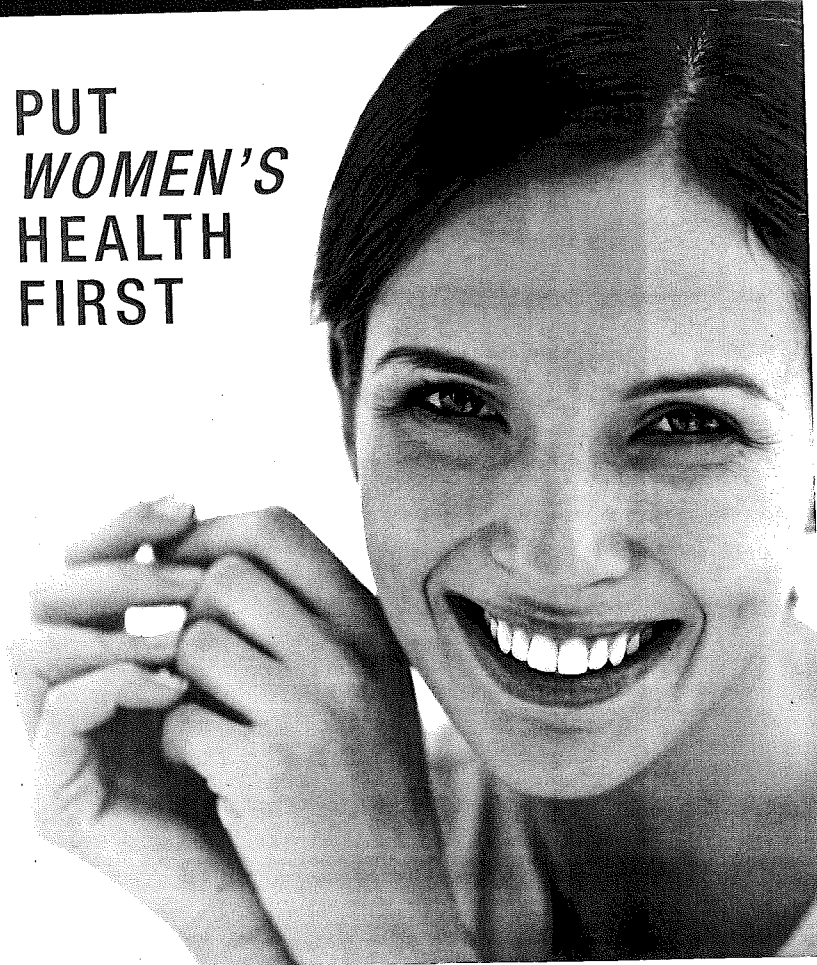
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Name Menica Davis edc  
E-mail address mdavis7@mea  
ZIP Code 27801

Additional Comments:

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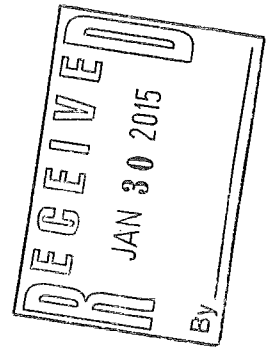
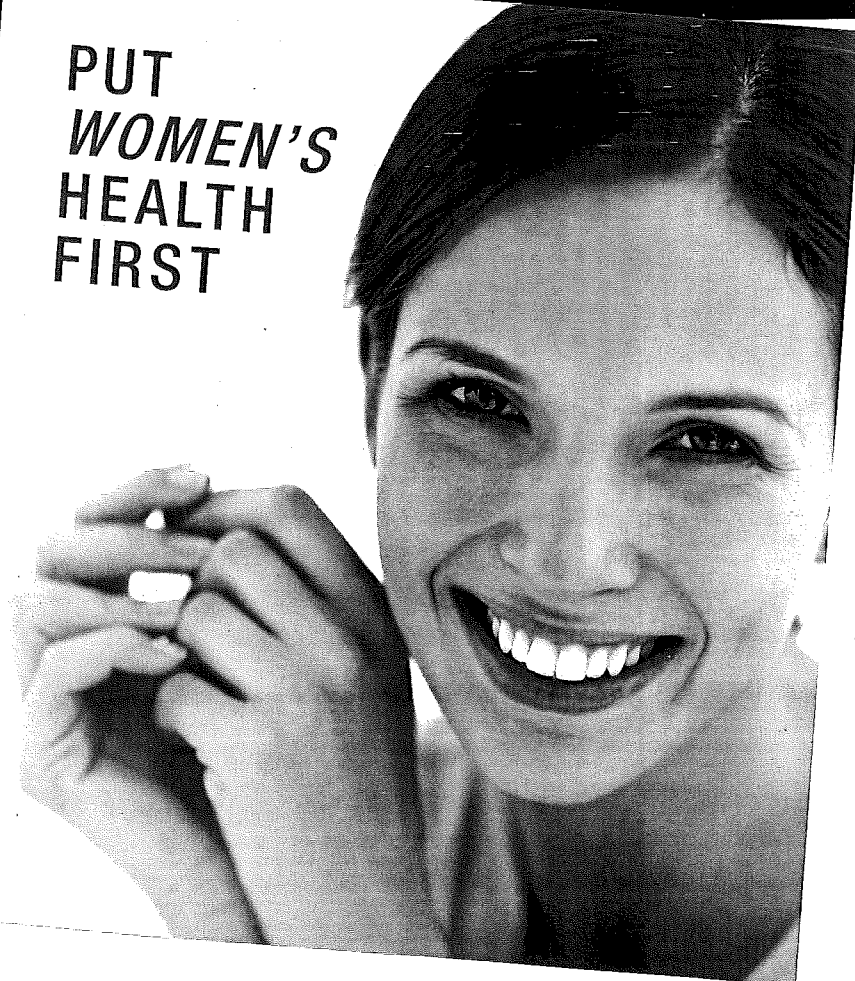
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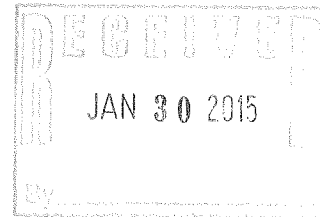
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Parenthood**  
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FIRST NAME:

LAST NAME:

SCOTT

DAVIS

EMAIL:

ZIP: 27604

floweras@hotmail.com

Optional Comment field:

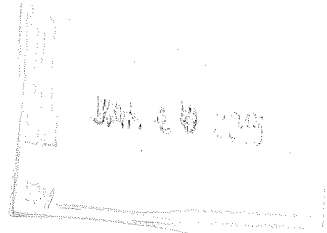
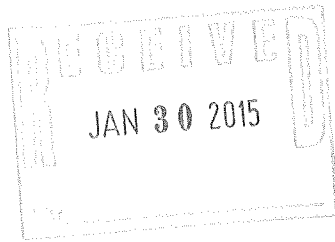
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FIRST NAME:

Cheryl

LAST NAME:

Davis

EMAIL:

cheryldavis@mcleanbuilding.com

ZIP:

27510

Optional Comment field:

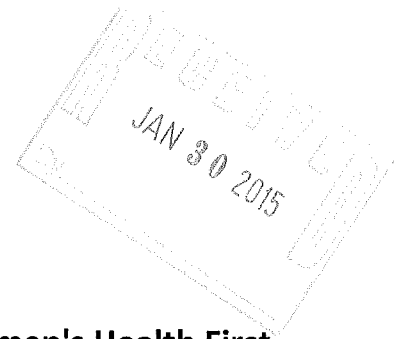
*I really appreciate the 24 hour hotline for women -*

Yes, I would like to receive updates from organizations supporting this comment.

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FIRST NAME:

Jesse

LAST NAME:

Davis

EMAIL:

jdavis555@gmail.com

ZIP:

28753

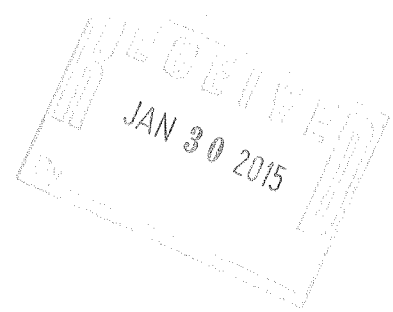
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FIRST NAME:

LANE

LAST NAME:

DAVIS

EMAIL:

ZIP:

27570

Optional Comment field:

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Name Louise Davis  
E-mail address louiscloringdavis@gmail.com  
ZIP Code 28805

Additional Comments:

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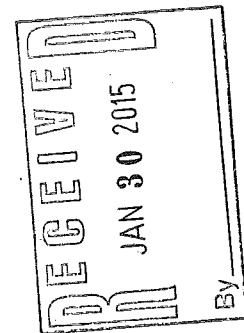
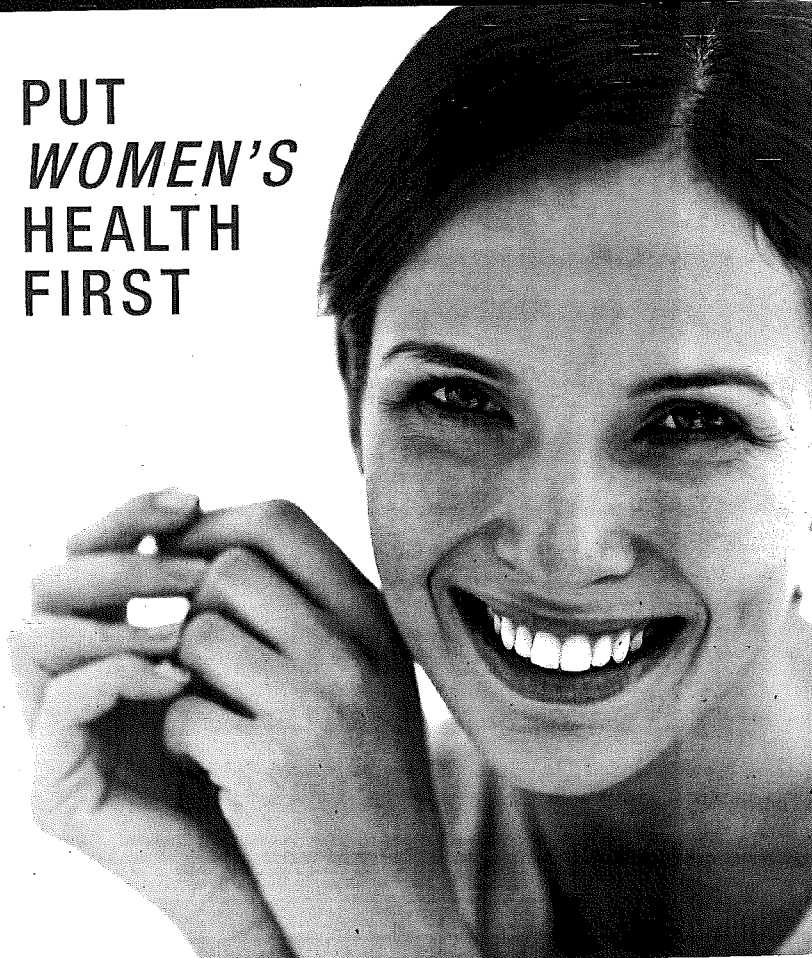


NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

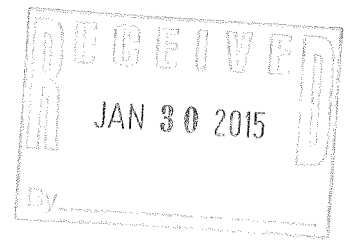
PUT  
WOMEN'S  
HEALTH  
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Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



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FIRST NAME:

LAST NAME:

Jim

Dawson

EMAIL:

ZIP:

27705

*Optional Comment field:*

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Alex Day  
E-mail address aday@unca.edu  
ZIP Code 28804

Additional Comments:

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Yes, I would like to receive updates from organizations supporting this comment:

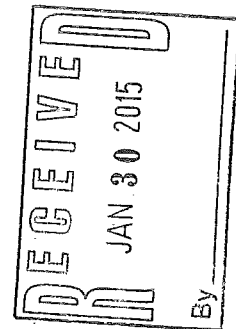
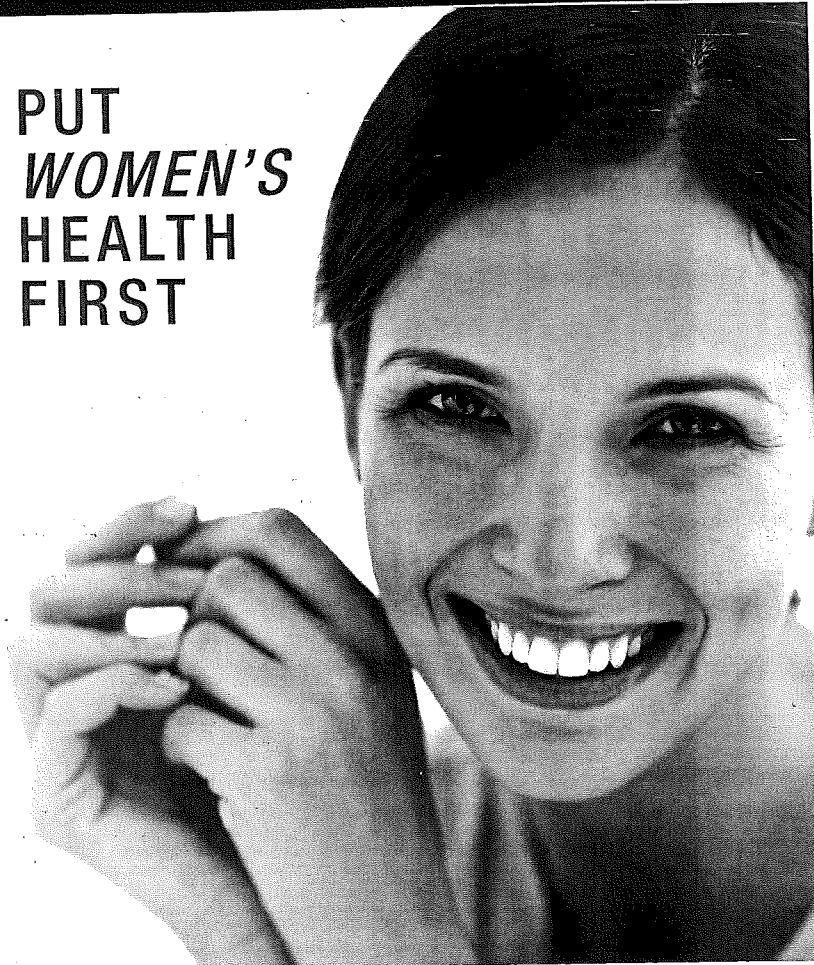


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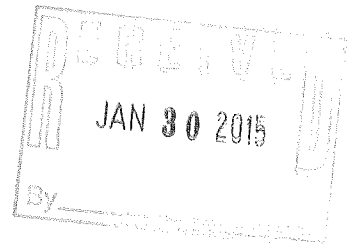


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HEALTH  
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FIRST NAME:

LAST NAME:

Robyn B

Dayton

EMAIL:

ZIP:

rdayton@gmail.com

27703

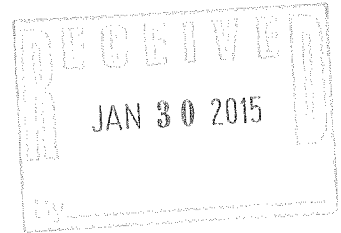
Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



Planned Parenthood Health Systems  
Action Fund, Inc.



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FIRST NAME:

Monica

LAST NAME:

Deangelis

EMAIL:

ZIP:

27521

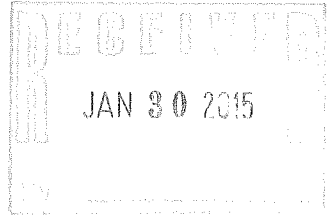
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FIRST NAME:

LAST NAME:

Carolyn

Deans

EMAIL:

ZIP:

cmdean@gmail.com

Raleigh

Optional Comment field:

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Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name raven deas  
E-mail address rjdeaso@ncsu.edu  
ZIP Code 27607

Additional Comments:

Do what is right!!

Yes, I would like to receive updates from organizations supporting this comment:



NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina



Planned Parenthood Health Systems  
Action Fund, Inc.



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FIRST NAME:

Alexandra

LAST NAME:

DeForge

EMAIL:

ZIP:

27707

*Optional Comment field:*

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Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC





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FIRST NAME:

LAST NAME:

Harriet I. Detweiler Anne Detweiler

EMAIL:

ZIP:

hardet@gmail.com

Optional Comment field:

*Women's proper health, proper education, and a secure future possibility for each child ~~is~~ are at a tremendous risk and need tremendous support.*

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Kristin White del Passio

E-mail address \_\_\_\_\_

ZIP Code 28209

Additional Comments:

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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Yes, I would like to receive updates from organizations supporting this comment.



NARAL  
Pro-Choice North Carolina Foundation



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Name Josylin Delrosario  
E-mail address jdelrosario93@gmail.com  
ZIP Code 27713

Additional Comments:

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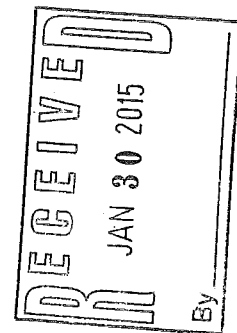
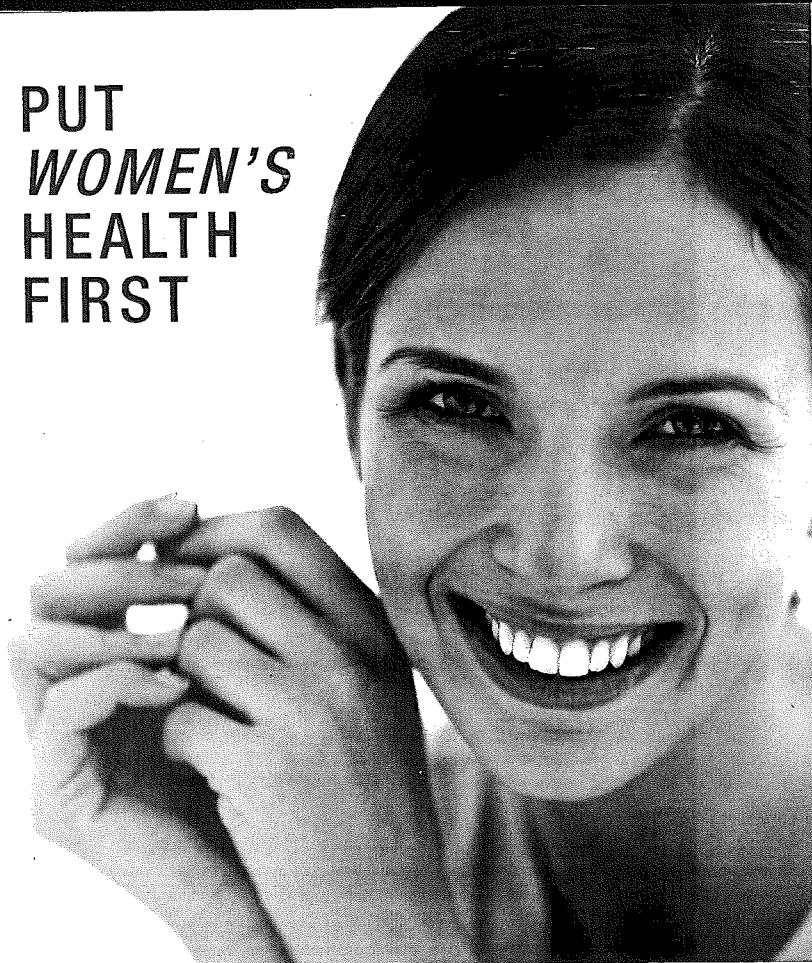
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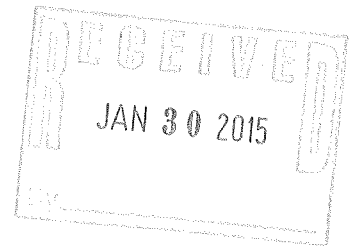
PUT  
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HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



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FIRST NAME:

Hannah

LAST NAME:

Delucia

EMAIL:

hdelucia@uncg.edu

ZIP:

28705

Optional Comment field:

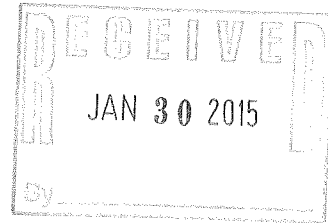
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*[Handwritten signature]*



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FIRST NAME:

Shelley

LAST NAME:

Delux

EMAIL:

shelleyd@mindspring.com

ZIP:

28205

Optional Comment field:

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Name Molly DeMarco  
E-mail address mollydemarco@gmail.com  
ZIP Code 27516

Additional Comments:

I am a public health professional with a PhD and I urge you to look @ the science on comprehensive reproductive care for women and support it.

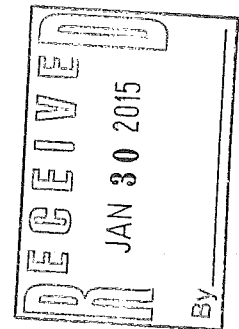
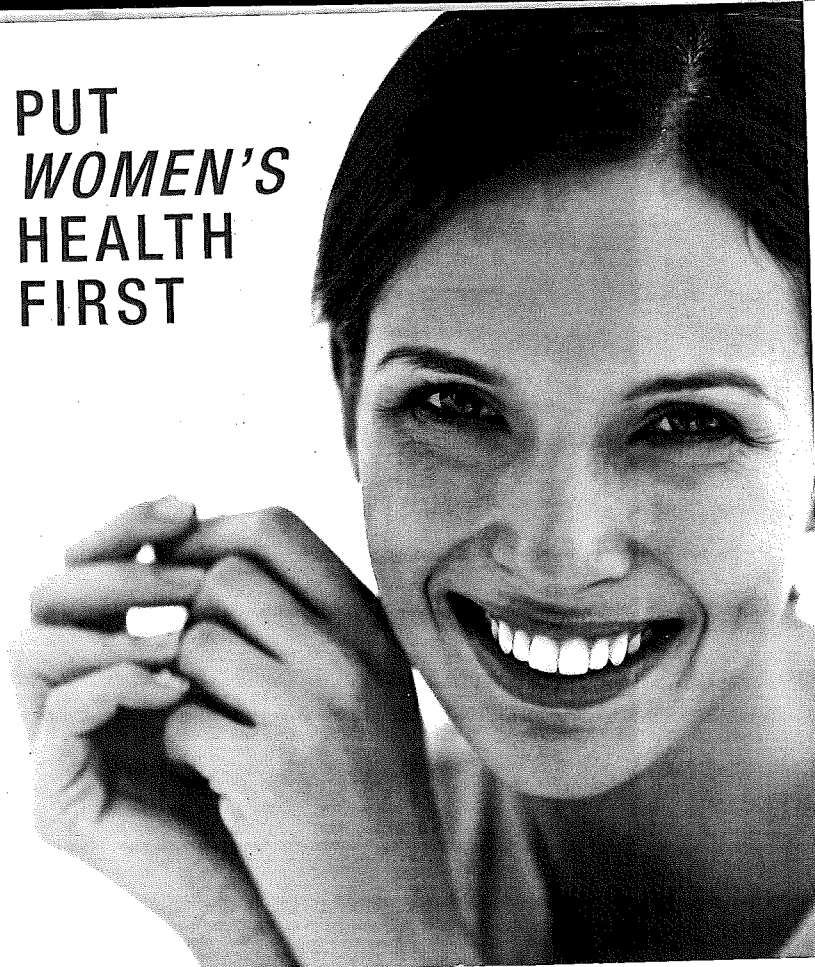
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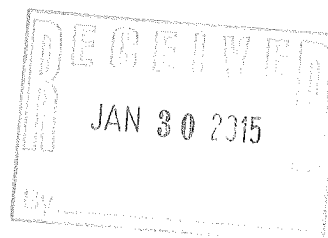
PUT  
**WOMEN'S  
HEALTH  
FIRST**



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



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FIRST NAME:

LAST NAME:

JACQUELINE

DERING

EMAIL:

ZIP: 27510

DERINGJA@EMAIL.MEREDITH.EDU

*Optional Comment field:*

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Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Kristin Dewan

E-mail address deLanoly Kristin@gmail.com

ZIP Code 27511

Additional Comments:

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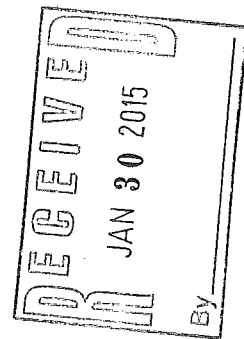
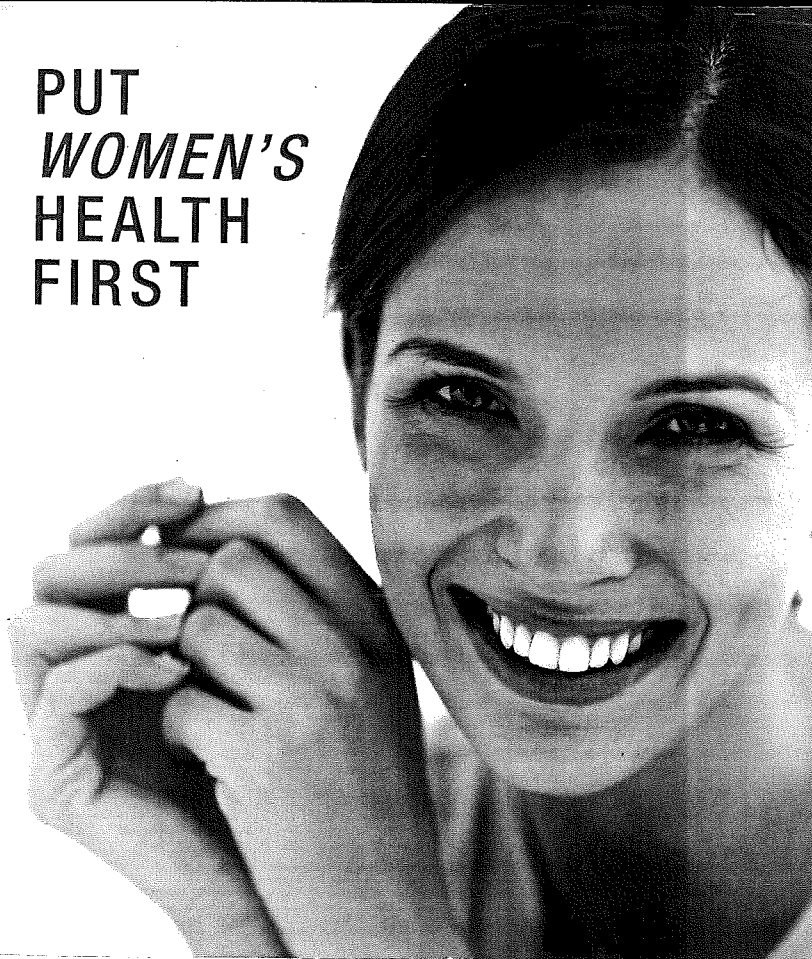


NARAL  
Pro-Choice North Carolina Foundation



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Division of Health Service Regulation  
2701 Mail Service Center  
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Name Amelia Dewberry  
E-mail address adewberry60@att.net  
ZIP Code 27591

Additional Comments:

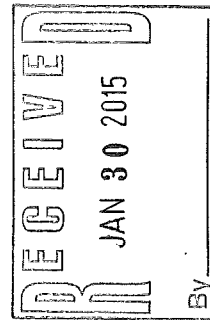
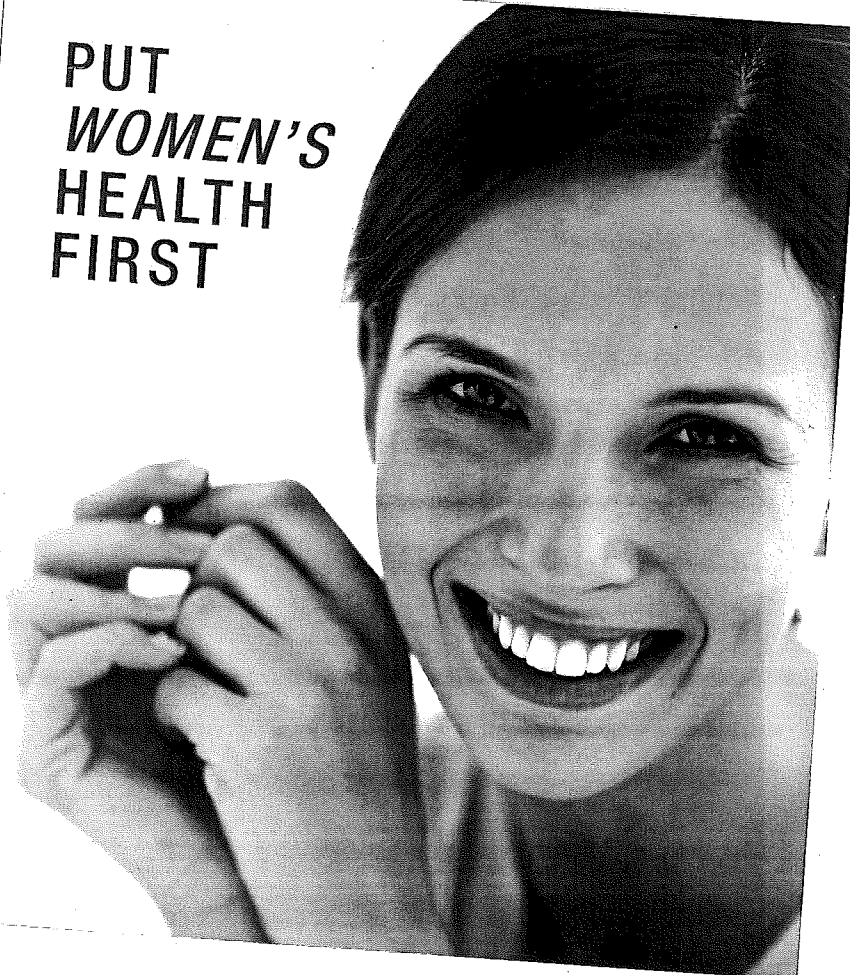
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Parenthood**  
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Name Carol Lee Diamond  
E-mail address CAROLJOE@MSJN.C.US  
ZIP Code 28715

Additional Comments:

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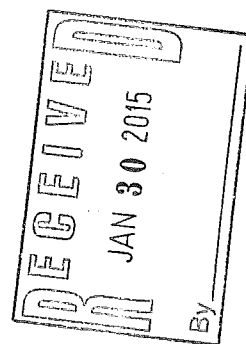
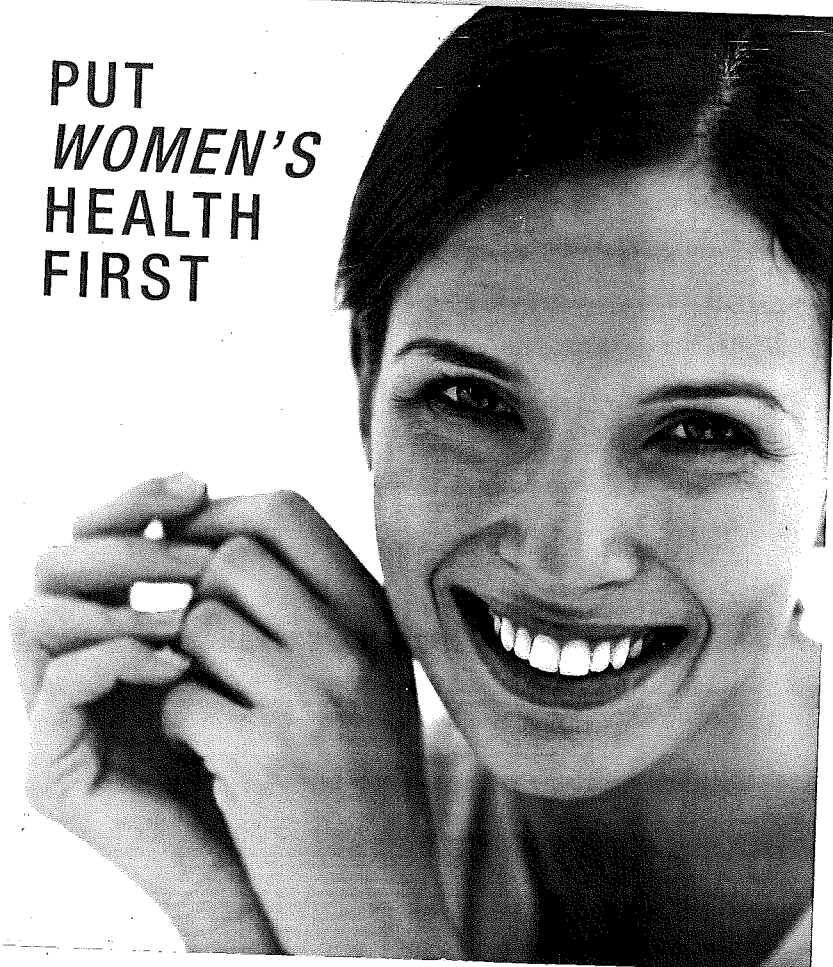


NARAL  
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Planned Parenthood Action Fund of North Carolina

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HEALTH  
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FIRST NAME:

Jane

LAST NAME:

Diamond

EMAIL:

jane.diamond@bellsouth.net

ZIP:

28226

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Angelica Diaz

E-mail address andiaz@ncsu.edu

ZIP Code 27607

Additional Comments:

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Name Kirsten Dickson  
E-mail address kirstendouglas@egm.cc  
ZIP Code 27703

Additional Comments:

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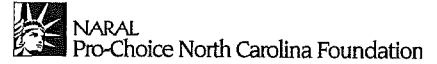
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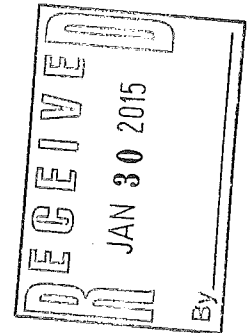
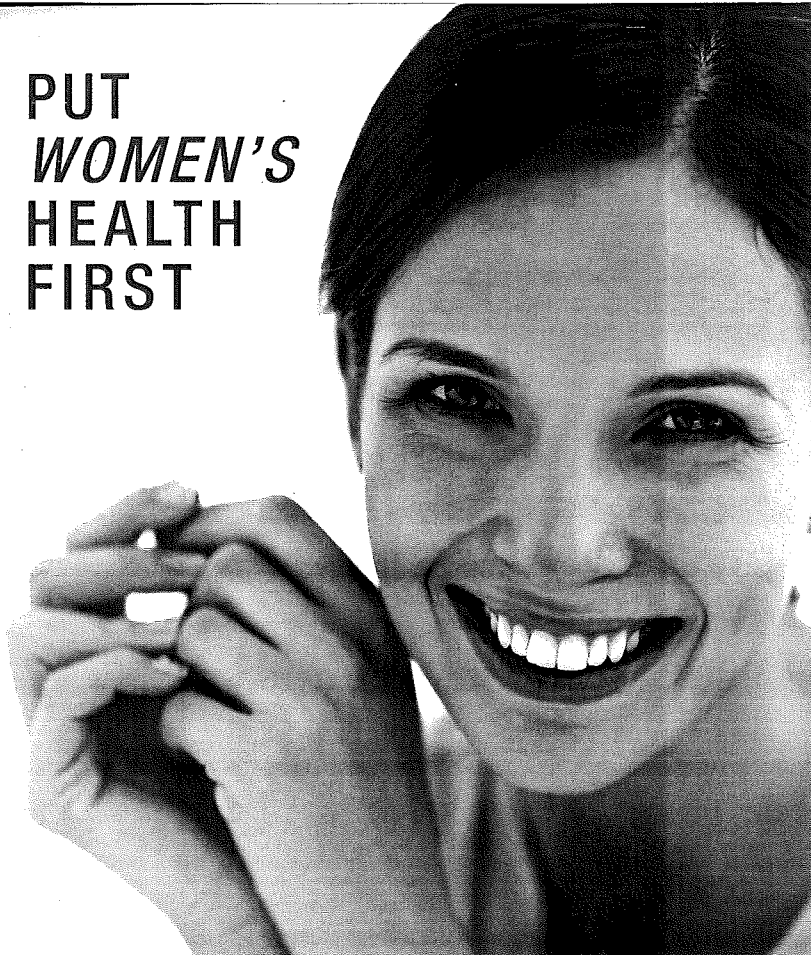
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Yes, I would like to receive updates from organizations supporting this comment:



Planned Parenthood Action Fund of North Carolina

PUT  
WOMEN'S  
HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Patth Dickson  
E-mail address pdickson@nc.rr.com  
ZIP Code 27703

Additional Comments:

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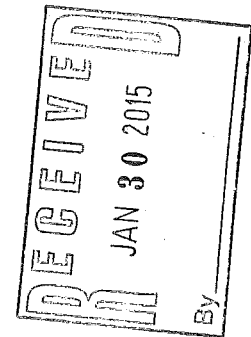
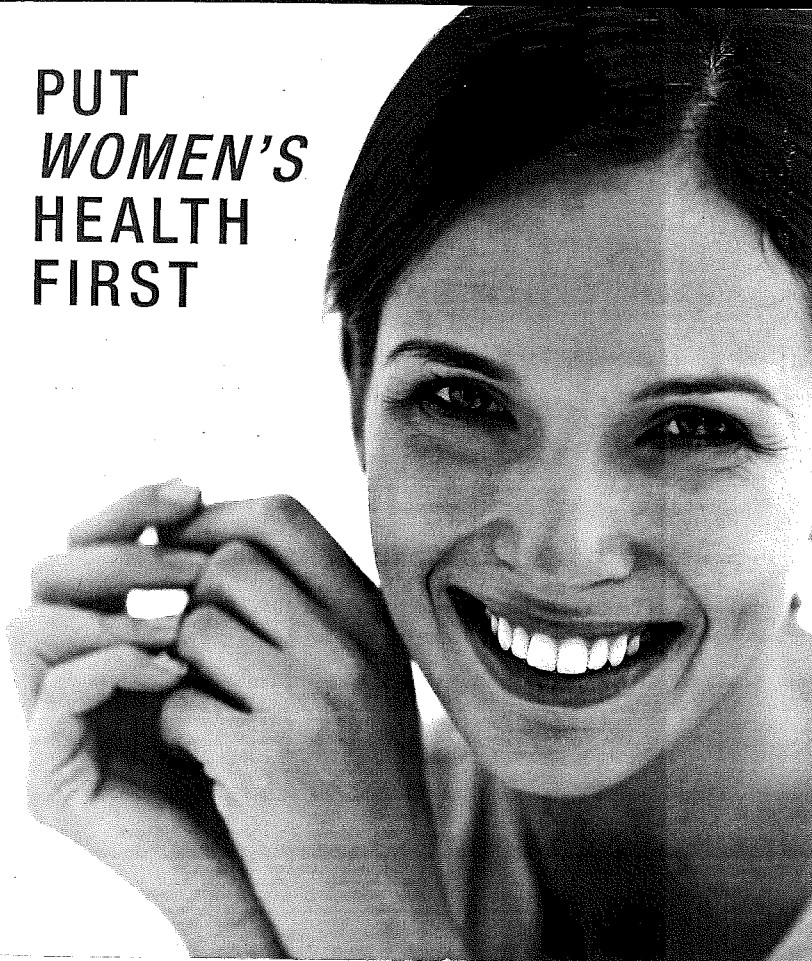
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Name Kathryn Dillard  
E-mail address durhamdill@gmail.com  
ZIP Code 27701

Additional Comments:

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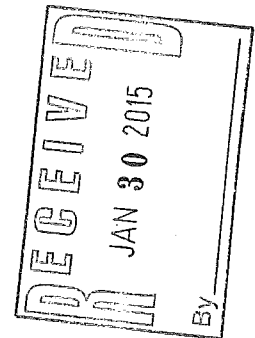
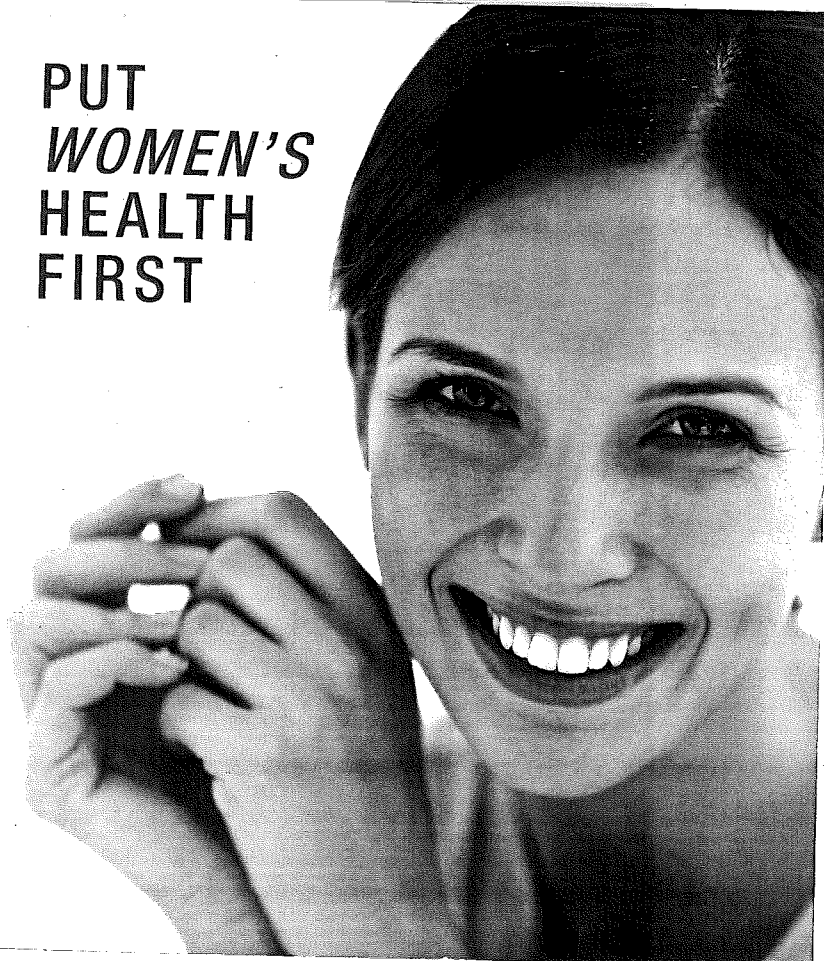
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Name Margaret Dillon  
E-mail address mdillon@WKA.ed  
ZIP Code 28792

Additional Comments:

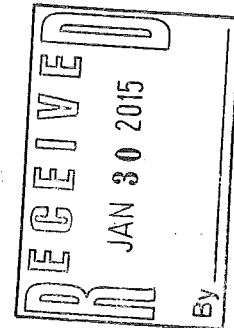
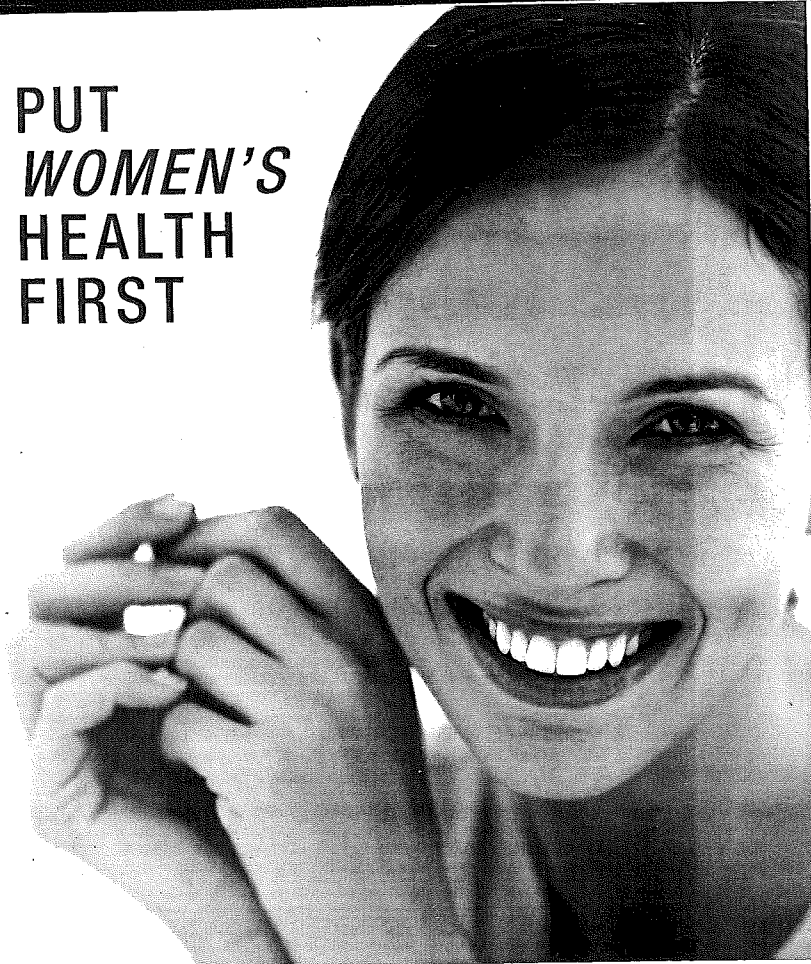
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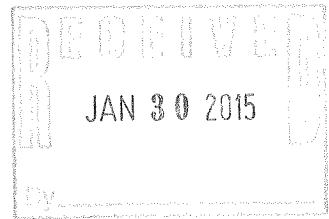


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FIRST NAME:

Jeff

LAST NAME:

Dillman

EMAIL:

dillmanj@yahoo.com 27705

ZIP:

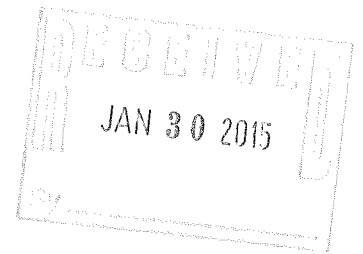
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FIRST NAME:

Sarah

LAST NAME:

Dingfelder

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loveydoux6x6x6@aim.com

ZIP:

27517

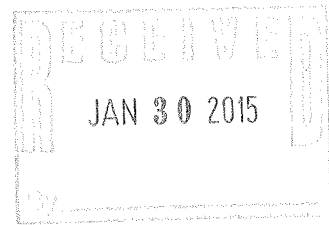
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FIRST NAME:

Luhe

LAST NAME:

Dingfelder

EMAIL:

lrdingfelders@ast.com

ZIP:

27517

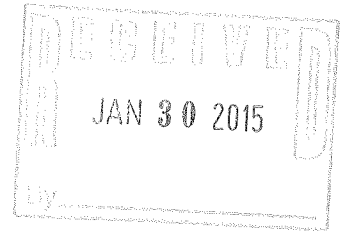
*Optional Comment field:*

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FIRST NAME:

LAST NAME:

Alan

DITmore

EMAIL:

ZIP:

aditmore@uvno.com

28753-9061

Optional Comment field:

Abortion is ALWAYS safer than childbirth. NC should follow CA to enable nurse-practitioner abortion.

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Allison Dixon

E-mail address allison.m.dixon@gmail.com

ZIP Code 27540

Additional Comments:

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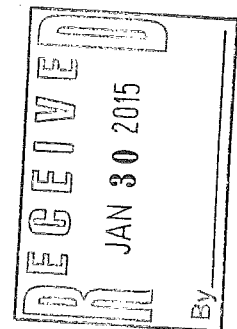
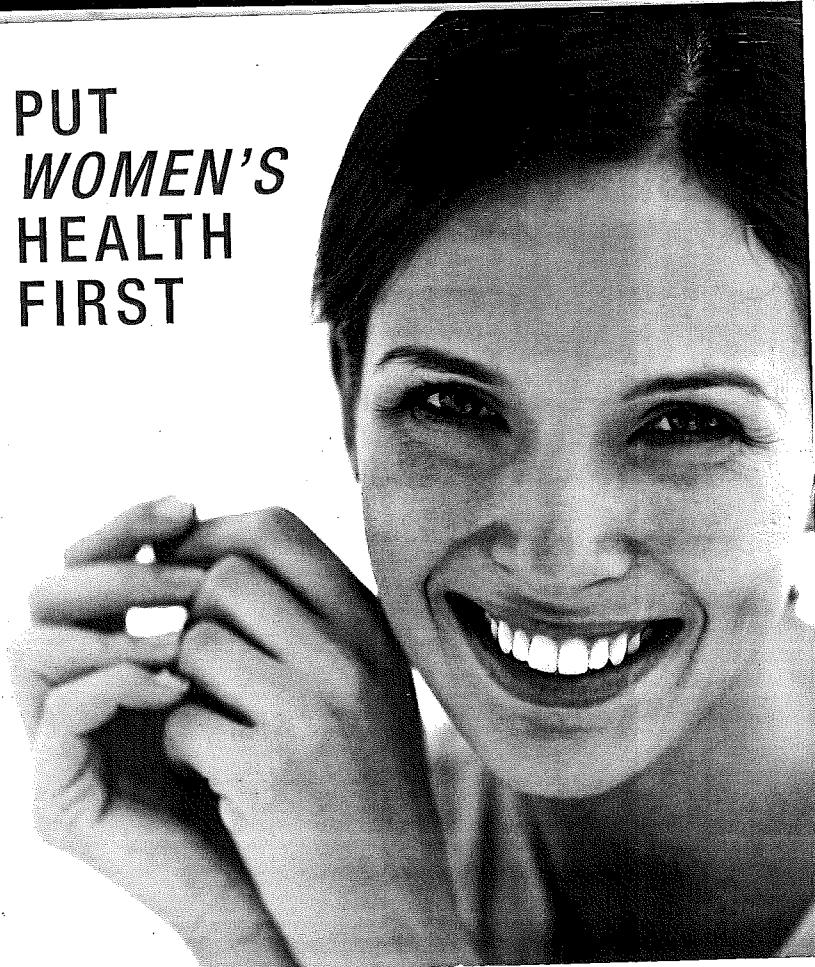
Yes, I would like to receive updates from organizations supporting this comment:

 NARAL  
Pro-Choice North Carolina Foundation

 **Planned  
Parenthood**  
Act. No matter what.

Planned Parenthood Action Fund of North Carolina

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Division of Health Service Regulation  
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Raleigh, NC 27699-2701

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Name Lexi D'Ueso  
E-mail address lexidueso@yahoo.com  
ZIP Code 28704

Additional Comments:

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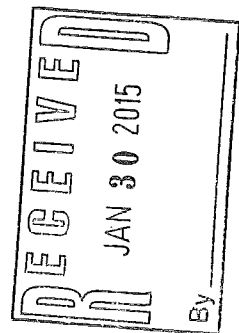
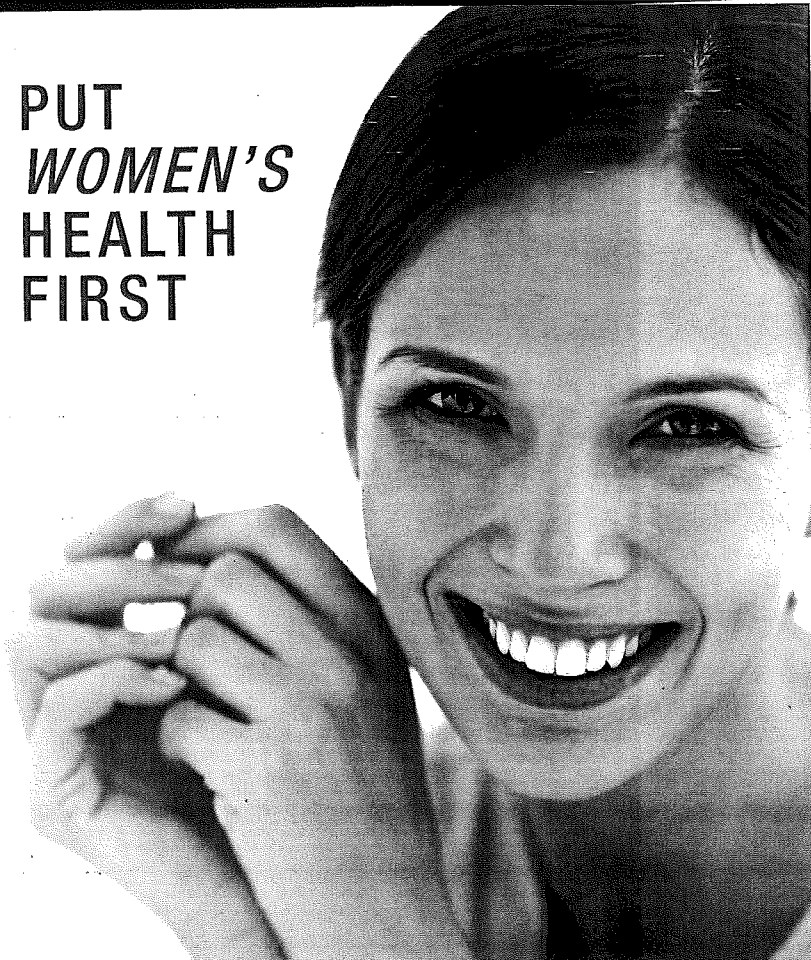
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Name Olivia Dobsonowski

E-mail address \_\_\_\_\_

ZIP Code 28804

Additional Comments:  
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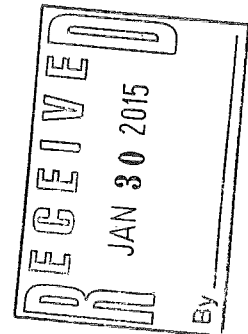
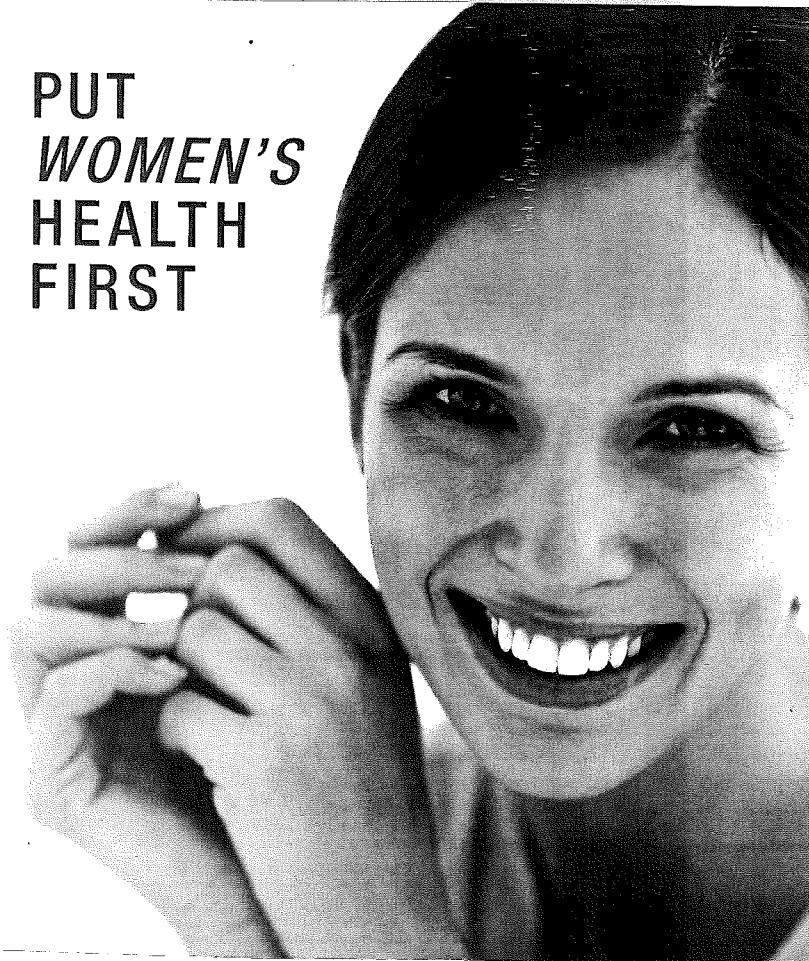
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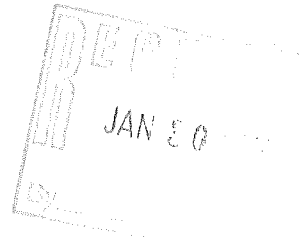
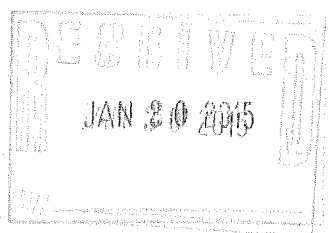
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FIRST NAME:

LAST NAME:

William

Donahue

EMAIL:

ZIP:

wid2@duke.edu

21576

Optional Comment field:

<sup>NO</sup> Yes, I would like to receive updates from organizations supporting this comment.

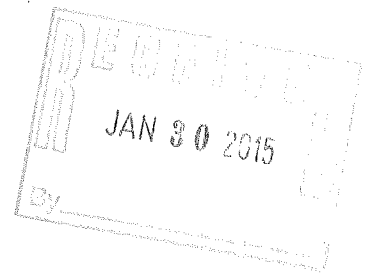
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FIRST NAME:

Molly

LAST NAME:

Donahue

EMAIL:

donahue.molly@gmail.com

ZIP:

27576

Optional Comment field:

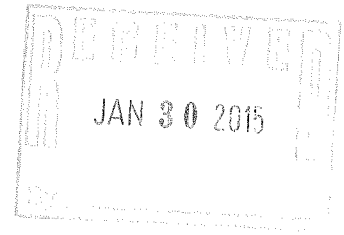
MD

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FIRST NAME:

LAST NAME:

Olivia Donahue

EMAIL:

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lilymdonahue@gmail.com 27514

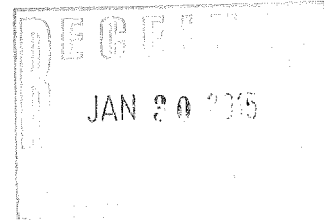
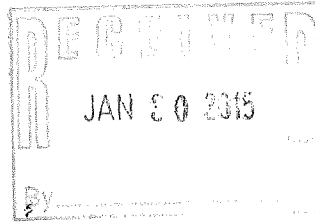
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FIRST NAME:

LAST NAME:

Allegra

Dorashan

EMAIL:

ZIP:

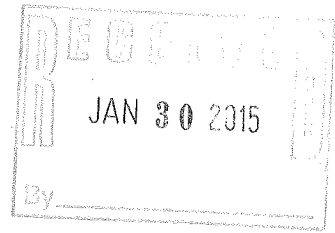
dadorass@ncsu.edu

27615

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FIRST NAME:

LAST NAME:

Morgan

Douglas

EMAIL:

ZIP:

mdouglas@email.meredith.edu 27603

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

# TAKE ACTION!

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Name Donta Dye  
E-mail address ddd000@gmail.com  
ZIP Code 28801

Additional Comments:

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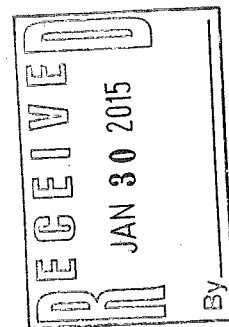
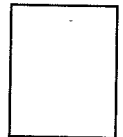
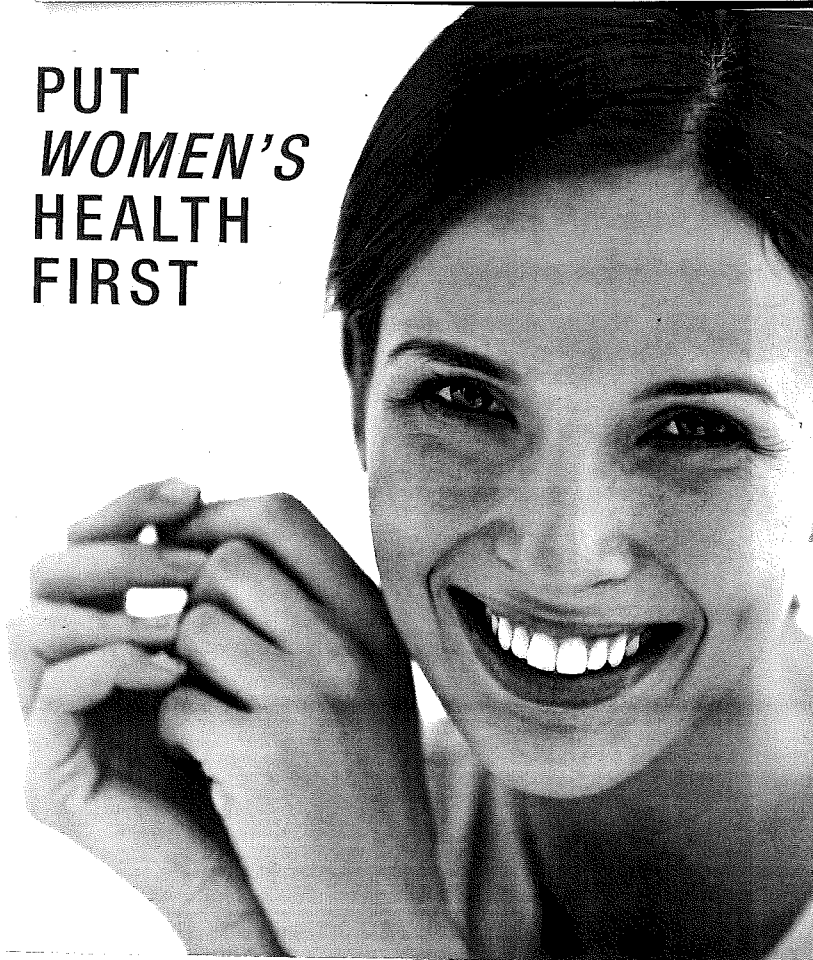
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Yes, I would like to receive updates from organizations supporting this comment:



Planned Parenthood Action Fund of North Carolina

PUT  
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HEALTH  
FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name McKenzie DUBOIS  
E-mail address mckenzievbois@gmail.com  
ZIP Code 27608

Additional Comments:

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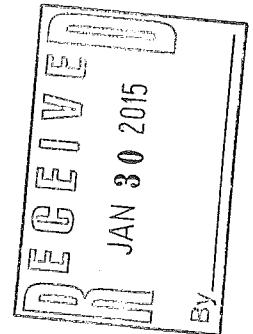
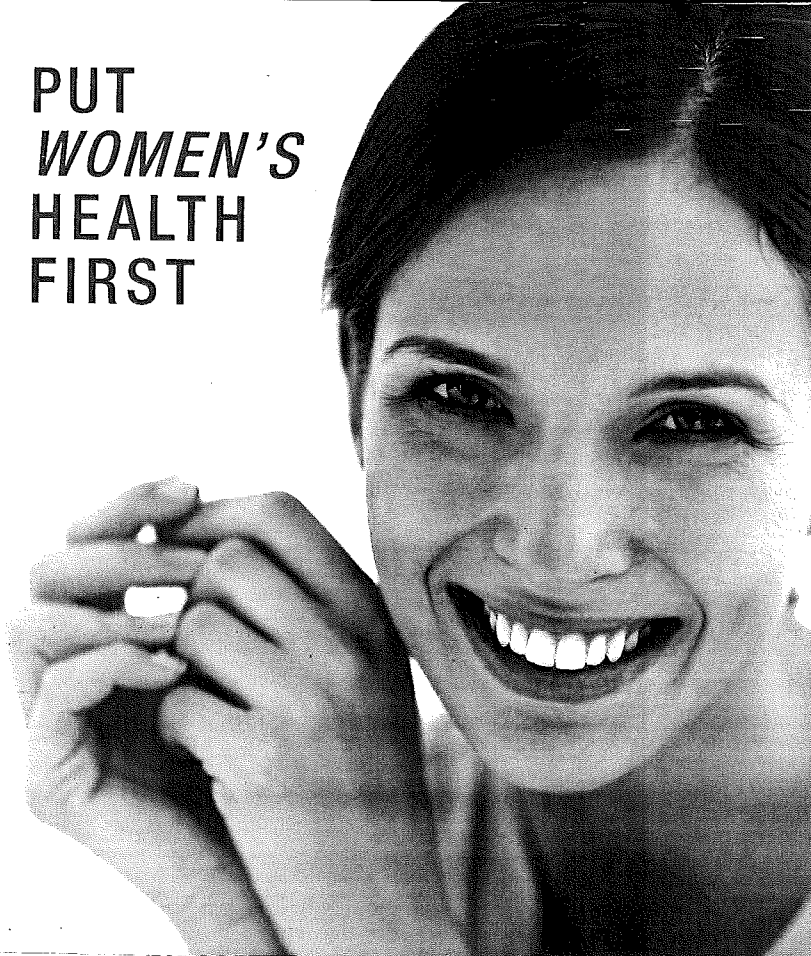
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 NARAL  
Pro-Choice North Carolina Foundation

 **Planned Parenthood**  
Act. No matter what.

Planned Parenthood Action Fund of North Carolina

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Name Sue Duchanois  
E-mail address sduchanois@aol.com  
ZIP Code 28205

Additional Comments:

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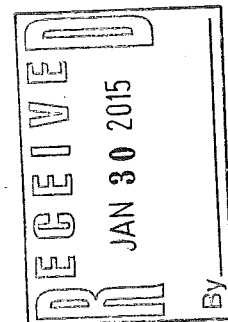
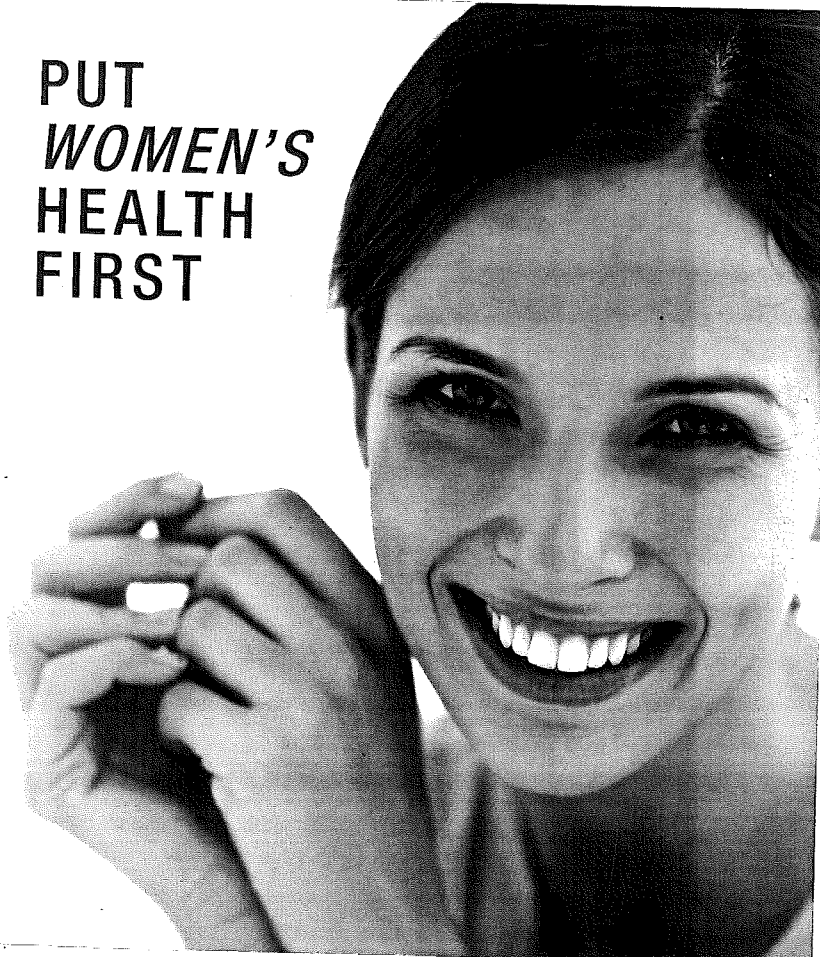
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Name Anna DuBois

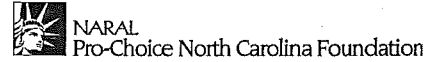
E-mail address \_\_\_\_\_

ZIP Code 27809

Additional Comments:

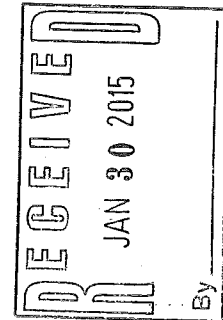
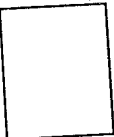
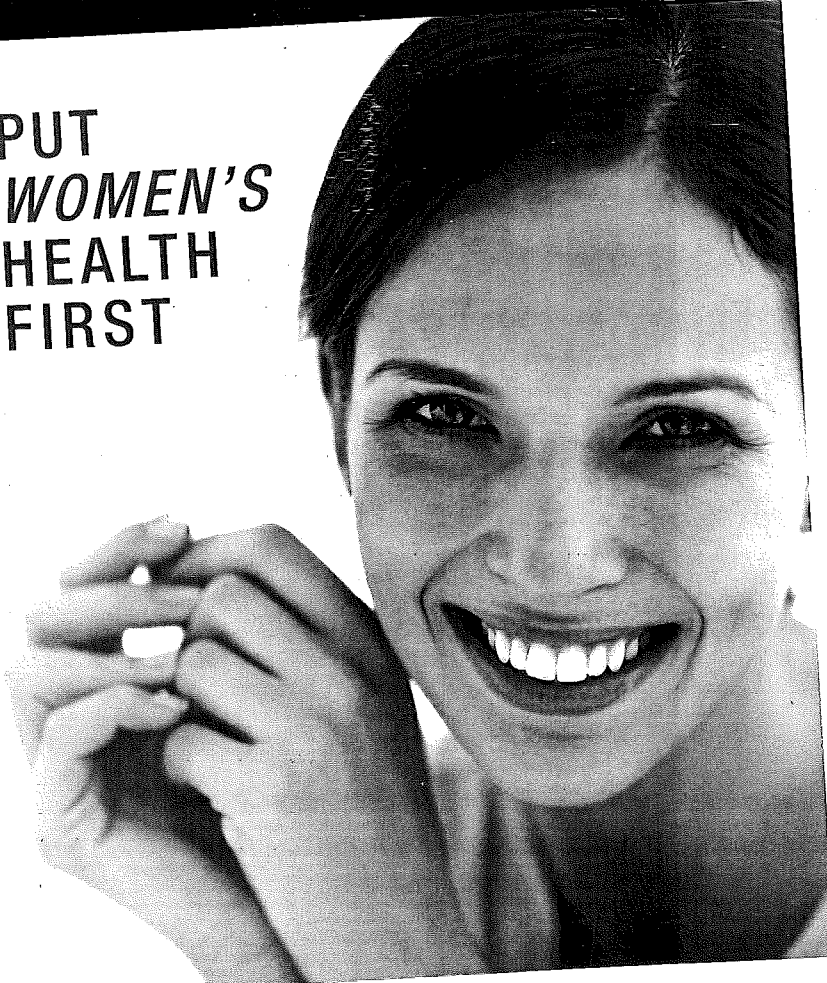
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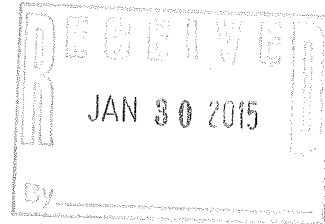


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FIRST NAME: Audrey LAST NAME: Duke  
EMAIL: audrey@dukecphoo.com ZIP: 28215

Optional Comment field:

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Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name STEVE DUNCAN

E-mail address DUNCANW09@LYNDSU.EDU

ZIP Code 27606

Additional Comments:

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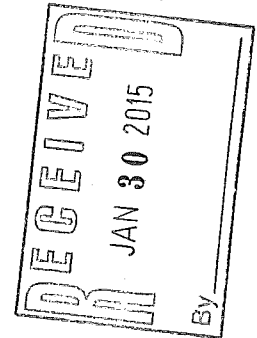
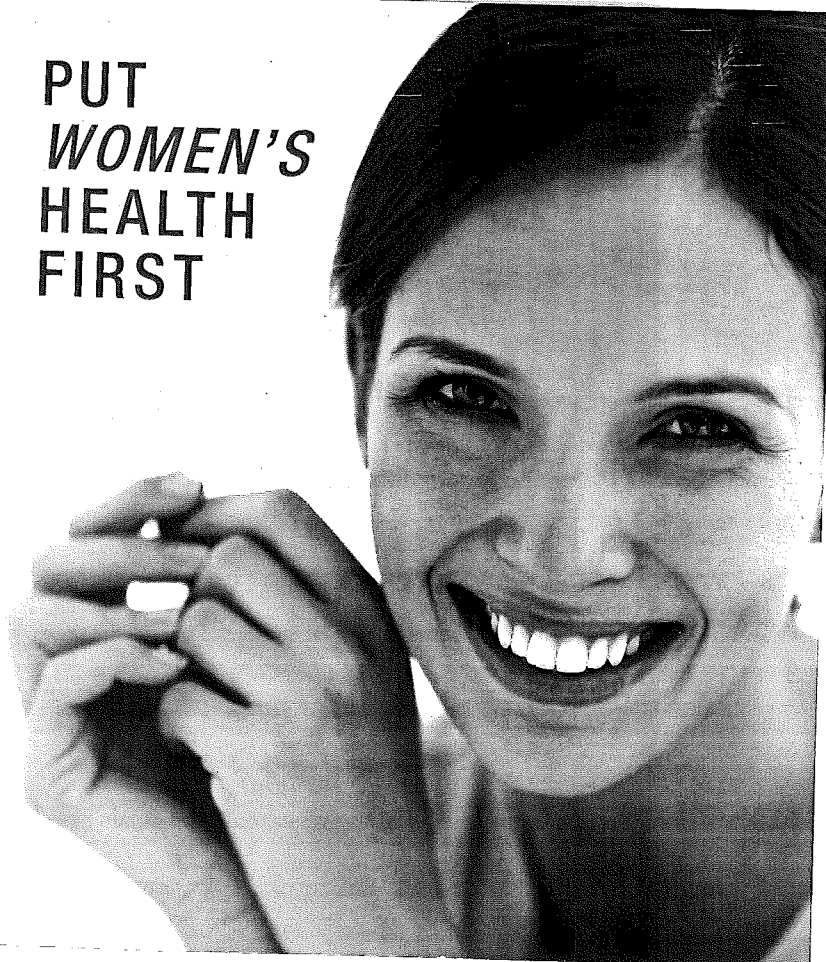


NARAL  
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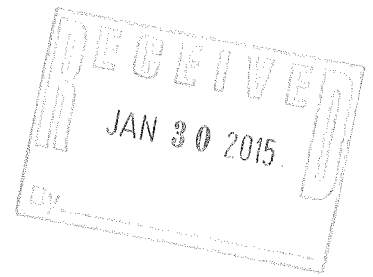
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Nadine Pfeiffer  
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FIRST NAME:

Sheila

LAST NAME:

Duncan

EMAIL:

piebird@gmail.com

ZIP:

27601

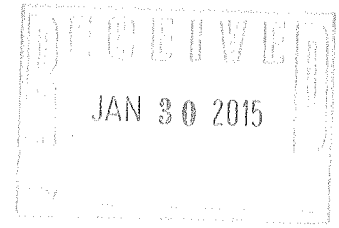
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FIRST NAME:

Scott

LAST NAME:

Duncan

EMAIL:

scottdh155@gmail.com

ZIP:

28803

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Name Diane Dunder  
E-mail address diane.dunder@duke.edu  
ZIP Code 27278

Additional Comments:

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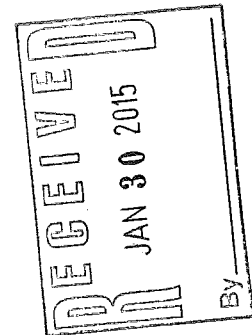
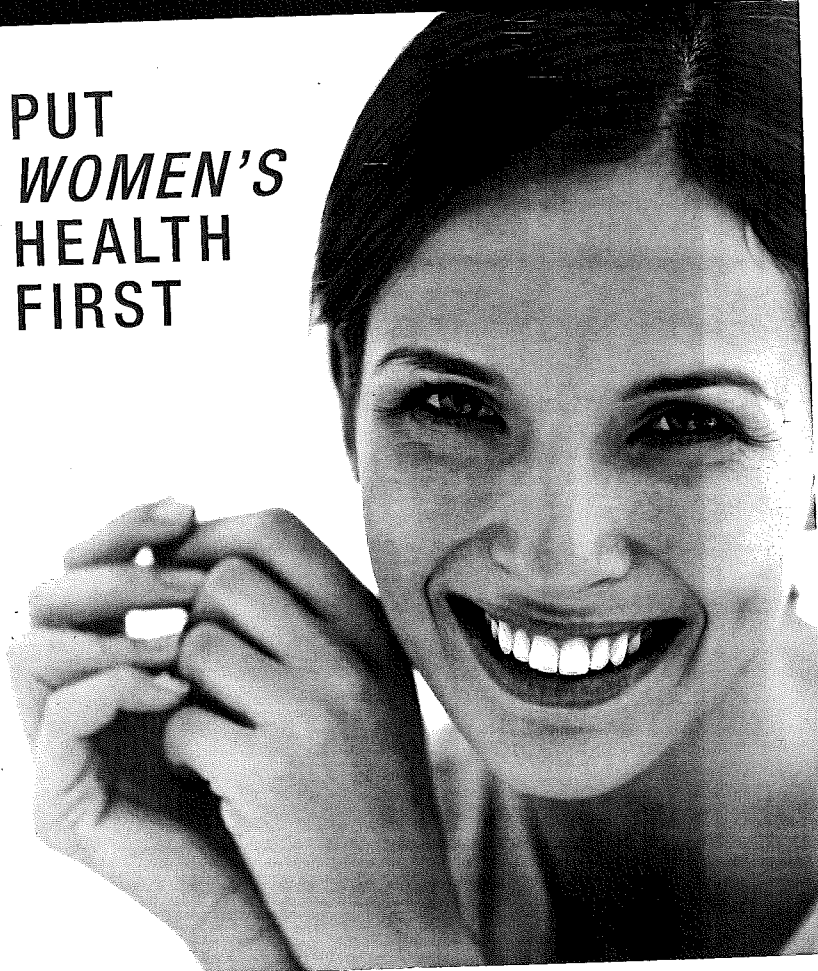
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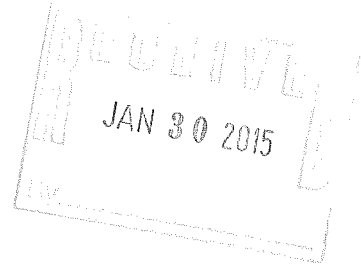
PUT  
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Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701



Planned Parenthood Health Systems  
Action Fund, Inc.



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FIRST NAME:

Lynn

LAST NAME:

Dupree

EMAIL:

dupree.lynn@gmail.com

ZIP:

28678

Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Sumita Dutta  
E-mail address SDuttaX@gmail.com  
ZIP Code 27713

Additional Comments:

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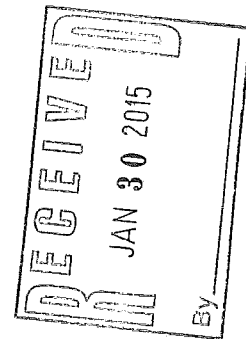
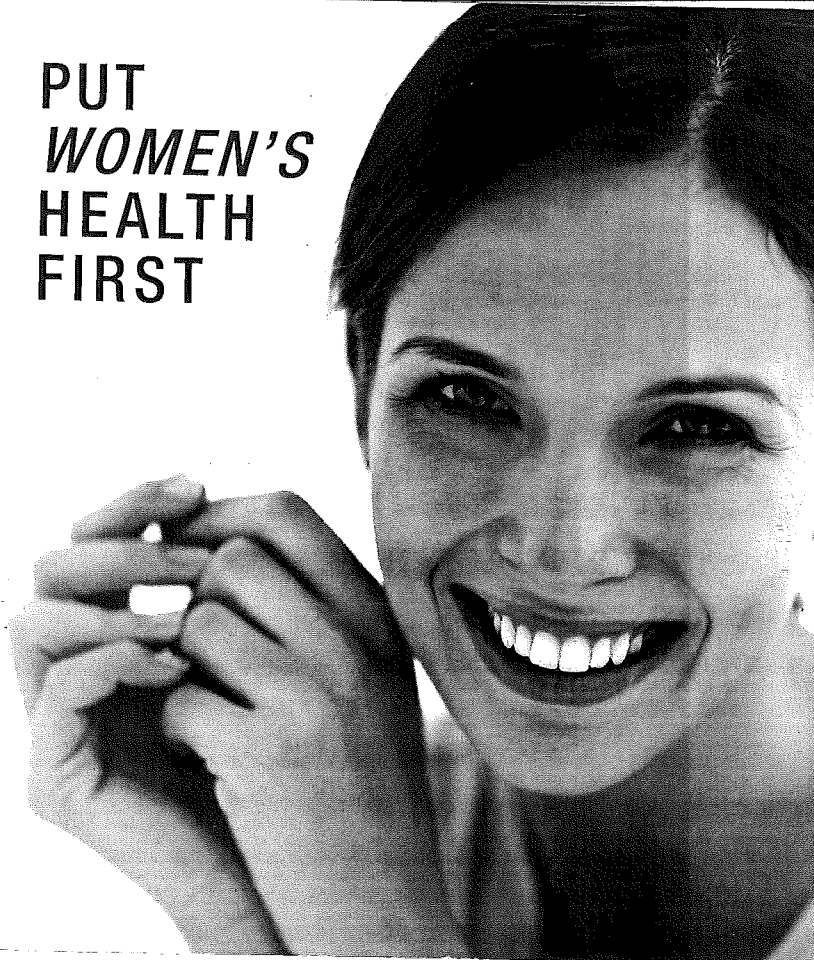
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## PUT WOMEN'S HEALTH FIRST



Nadine Pfeiffer  
Division of Health Service Regulation  
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Raleigh, NC 27699-2701

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Name Shannon Earle

E-mail address s.earle@uncg.edu

ZIP Code 27807

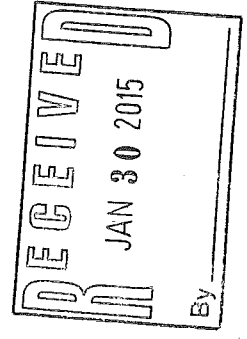
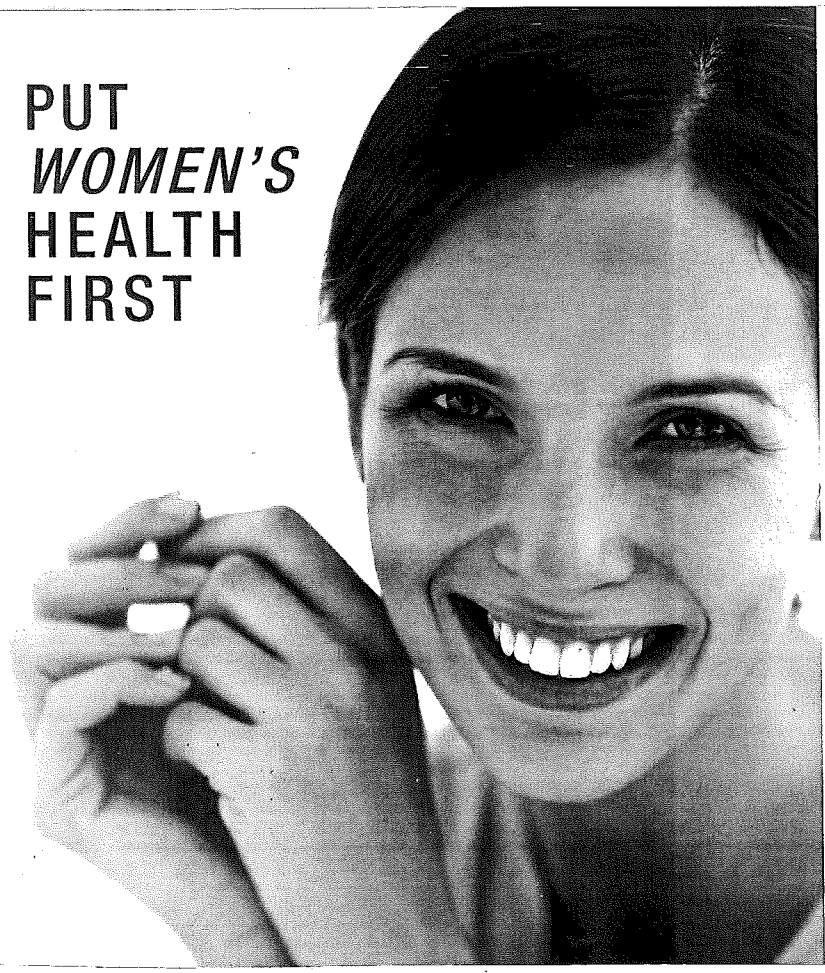
Additional Comments:  
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Name Chelsea Earles  
E-mail address Chelsea-rae  
ZIP Code 27701 @hotmail.com

Additional Comments:

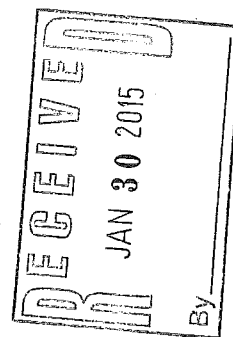
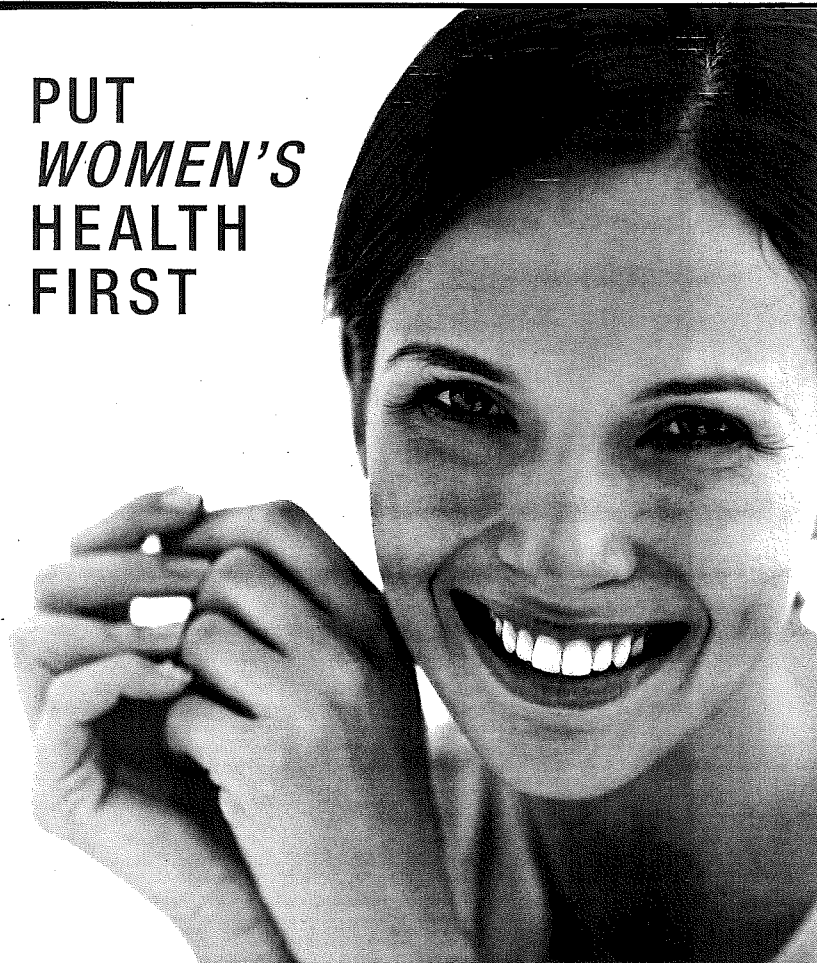
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Name Oceane Ebron

E-mail address oebron@ncsu.edu

ZIP Code 27607

Additional Comments:

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NARAL  
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Name Cheyenne Lee Edwards  
E-mail address CHEYENNE 727  
@gmail.com  
ZIP Code 27302

Additional Comments:

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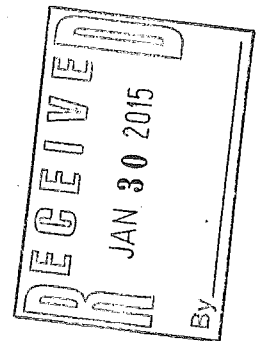
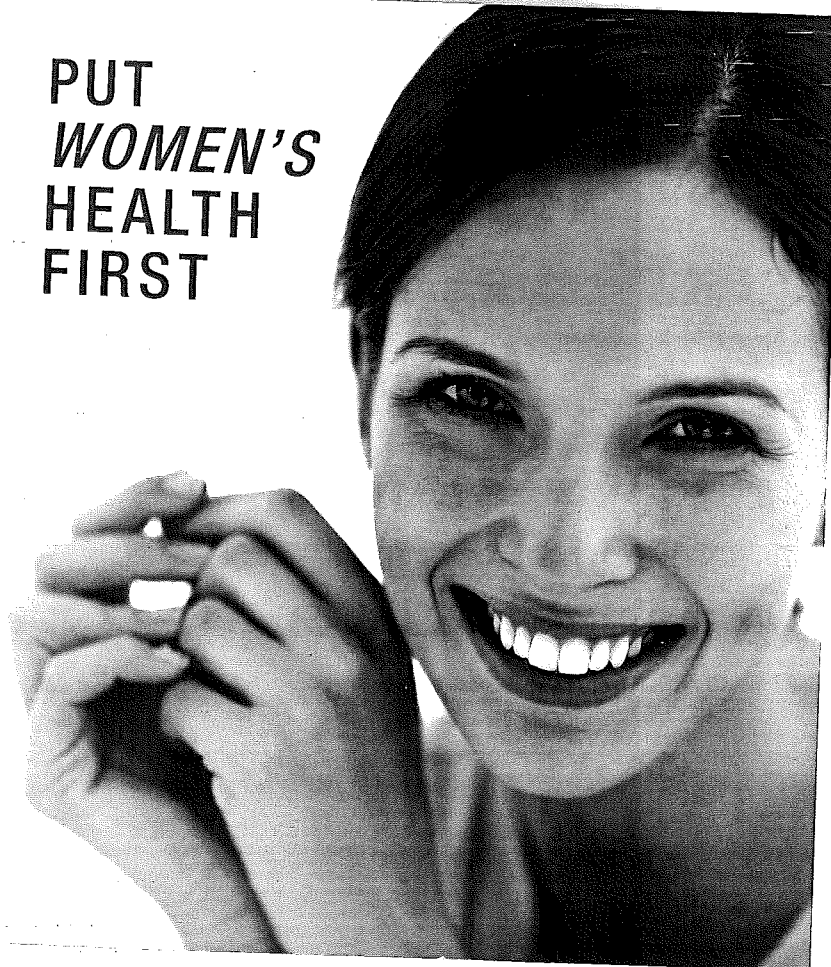


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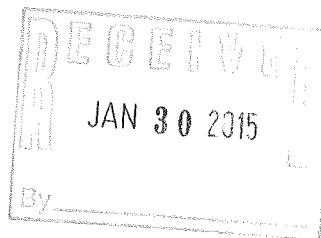
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FIRST NAME:

*Anne*

LAST NAME:

*Edwards*

EMAIL:

*amedwards@email.meredith.edu*

ZIP:

*Optional Comment field:*

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

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Name Omar El-Amin

E-mail address elamin@gmail.com

ZIP Code 28216

Additional Comments:

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Yes, I would like to receive updates from organizations supporting this comment:

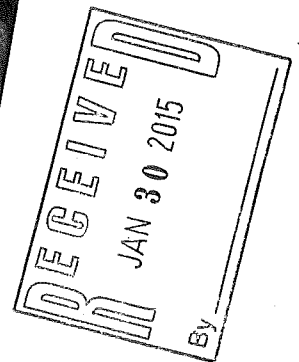


NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

**PUT  
WOMEN'S  
HEALTH  
FIRST**



Nadine Pfeiffer  
Division of Health Service Regulation  
2701 Mail Service Center  
Raleigh, NC 27699-2701

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Name Leann Elizondo  
E-mail address leann.elizondo@gmail.com  
ZIP Code 29204

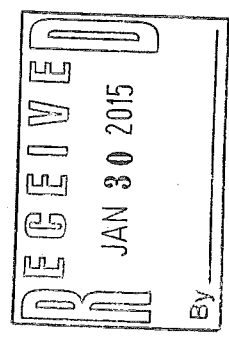
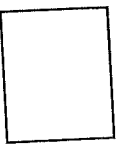
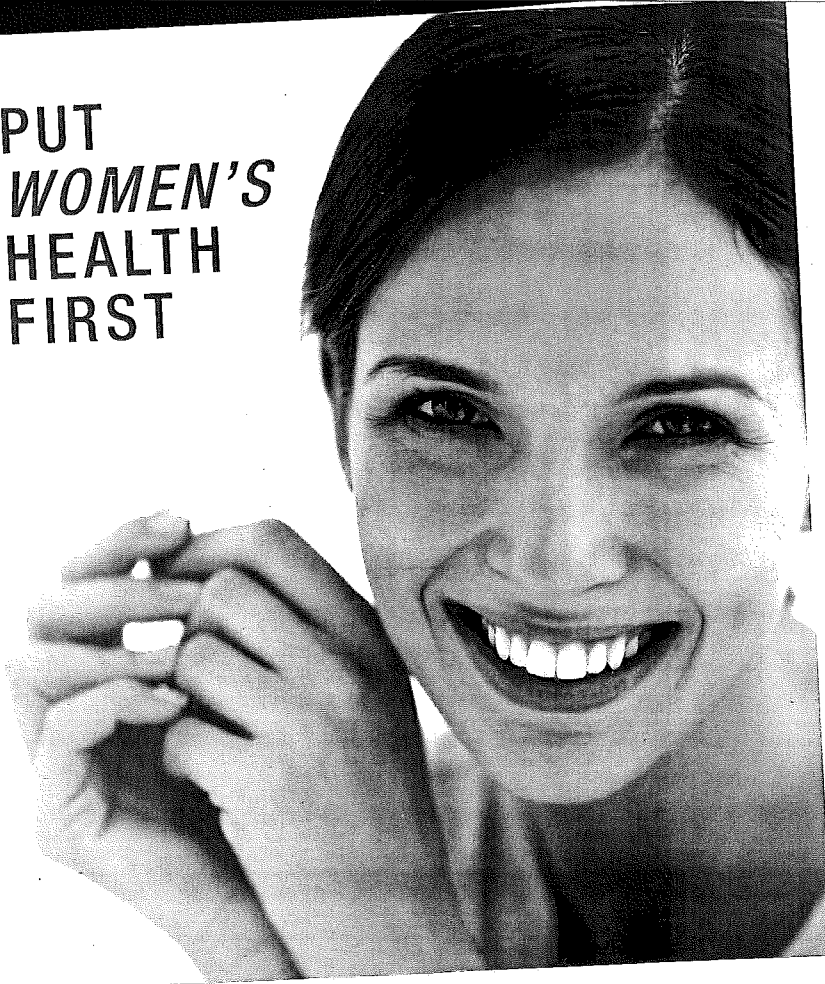
Additional Comments:  
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Name Melissa D. Eller

E-mail address alixandhilda@gmail.com

ZIP Code 27560

Additional Comments:

The choice to have an abortion is very personal and should be protected. Women of all income levels deserve access to health care services.

Yes, I would like to receive updates from organizations supporting this comment:



NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

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Name Taylor Ellebee  
E-mail address ~~@~~ Taylor.brewton@gmail.com  
ZIP Code 27701

Additional Comments:

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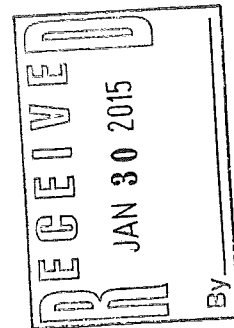
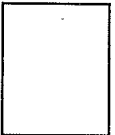
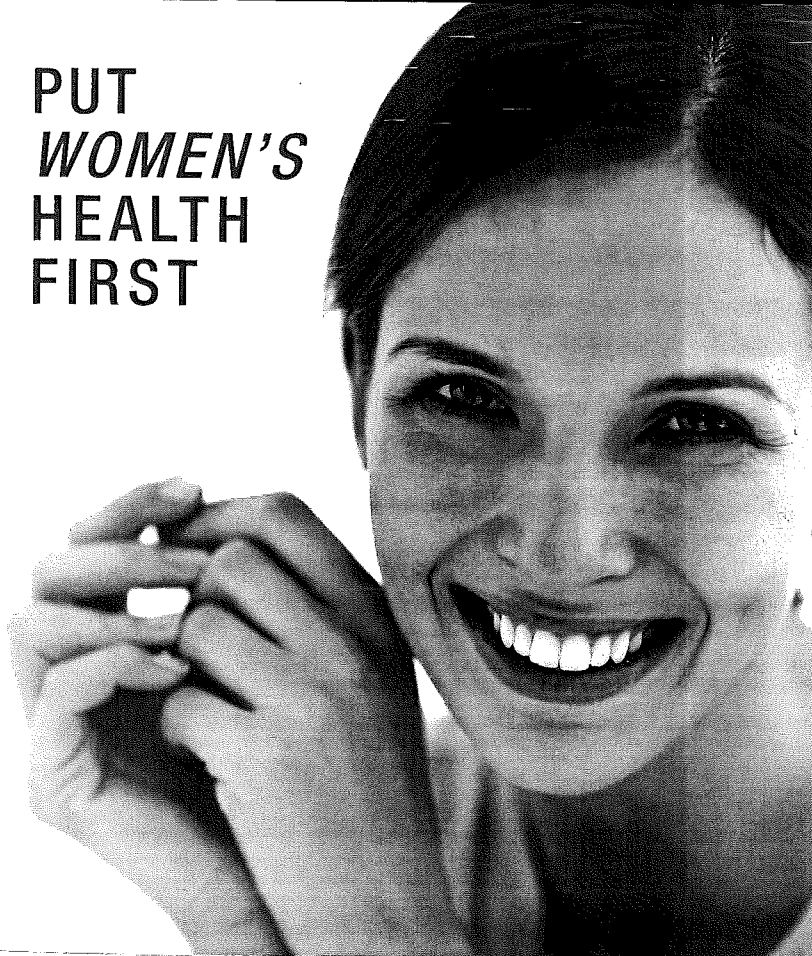
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Name Cheryl Ellis  
E-mail address cherylellis@gmail.com  
ZIP Code 27526

Additional Comments:

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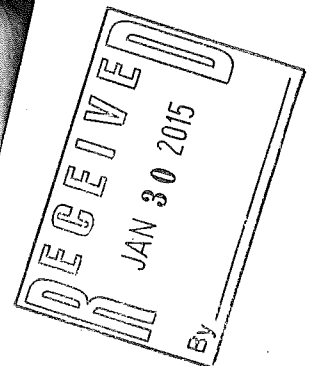
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 NARAL  
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 **Planned Parenthood**  
Act. No matter what.

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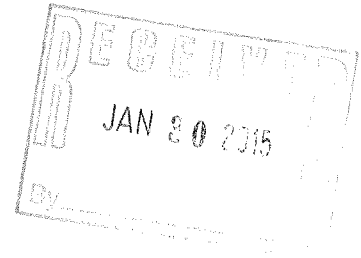
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FIRST NAME:

Sadie

LAST NAME:

Ellis

EMAIL:

ZIP:

27610

*Optional Comment field:*

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Name JERRY ELLISBERG

E-mail address ellisberge@hpeprint.com

ZIP Code 27615

Additional Comments:

*Please respect informed medical evidence & opinion as opposed to those lawmakers who would dictate their personal immorality and deny a choice of life's health to any woman.*

Yes, I would like to receive updates from organizations supporting this comment:



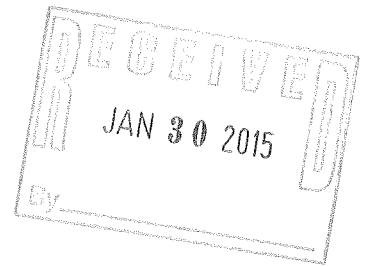
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FIRST NAME:

Carolyn

LAST NAME:

Ellison

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ellisoncarolyn3@gmail.com

ZIP:

28801

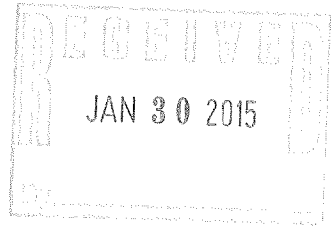
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FIRST NAME:

Mary

LAST NAME:

Ely

EMAIL:

Maryely@gmail.com

ZIP:

27519

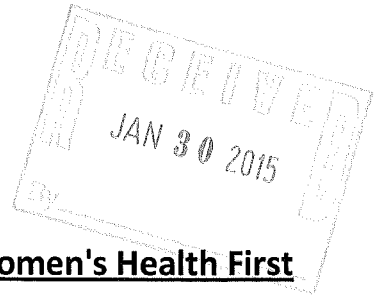
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FIRST NAME:

Randy

LAST NAME:

Emmitt

EMAIL:

ZIP:

27572

*Optional Comment field:*

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Name Rodney England  
E-mail address Rengland@unca.edu  
ZIP Code 28804

Additional Comments:

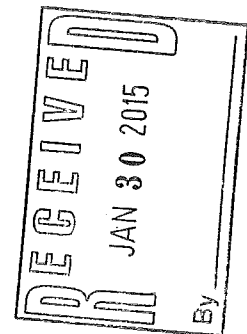
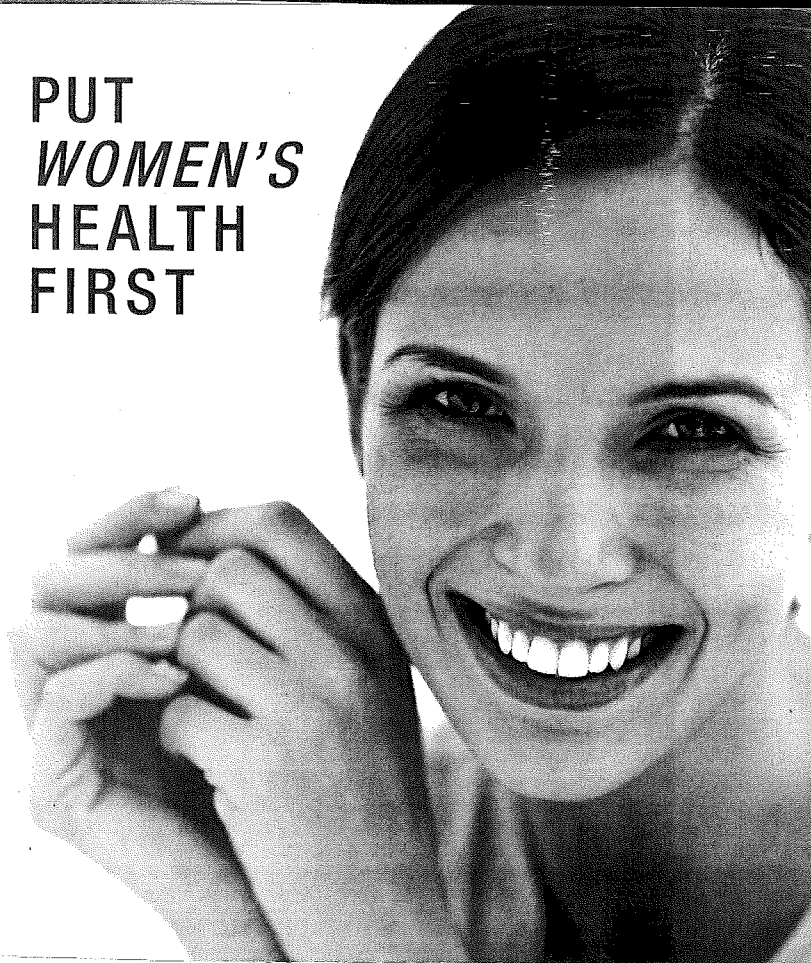
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2701 Mail Service Center  
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Name Haley Enten

E-mail address \_\_\_\_\_

ZIP Code 28806

Additional Comments:  
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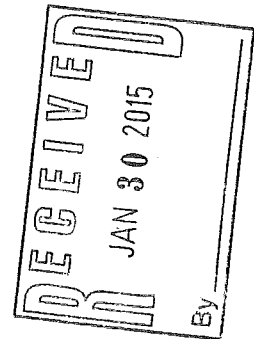
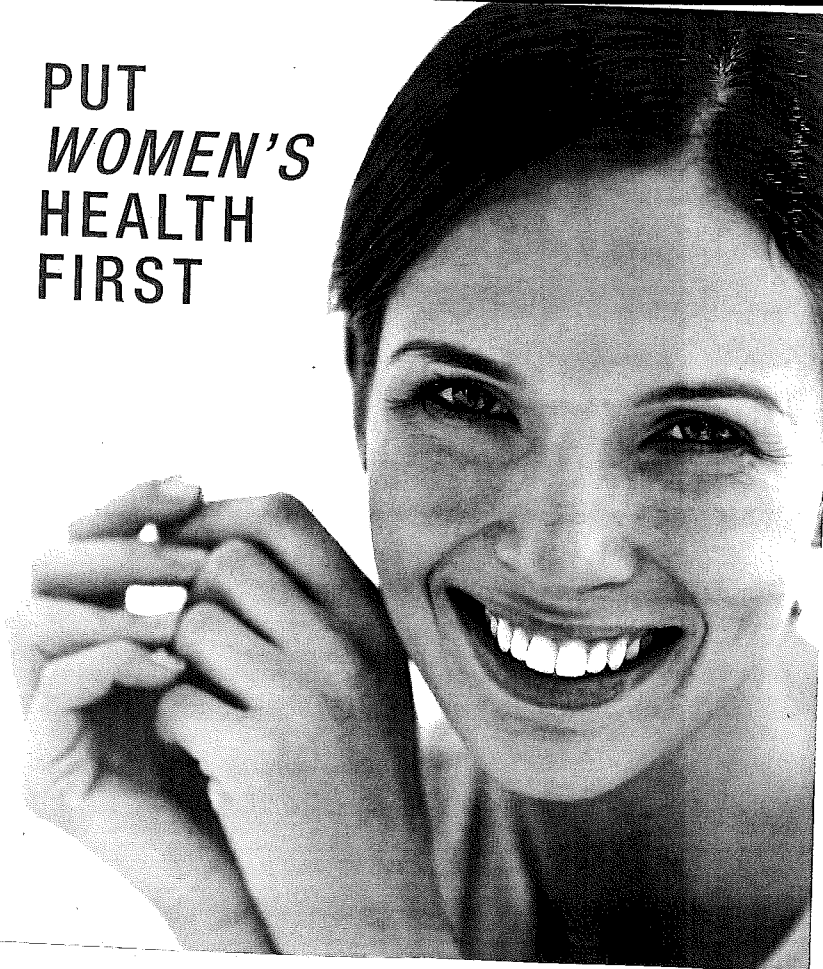
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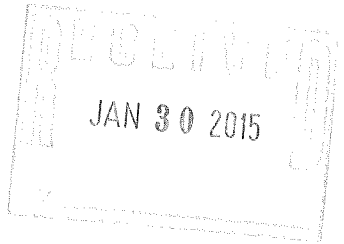
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FIRST NAME:

*Susan*

LAST NAME:

*Enwright Hicks*

EMAIL:

*@ashevillewedding@gmail.com*

ZIP:

*28804*

Optional Comment field:

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Name Chance Emsling  
E-mail address X  
ZIP Code 28704

Additional Comments:

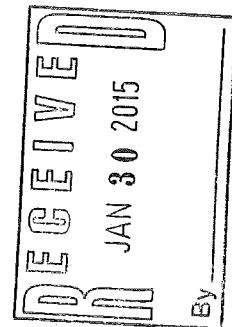
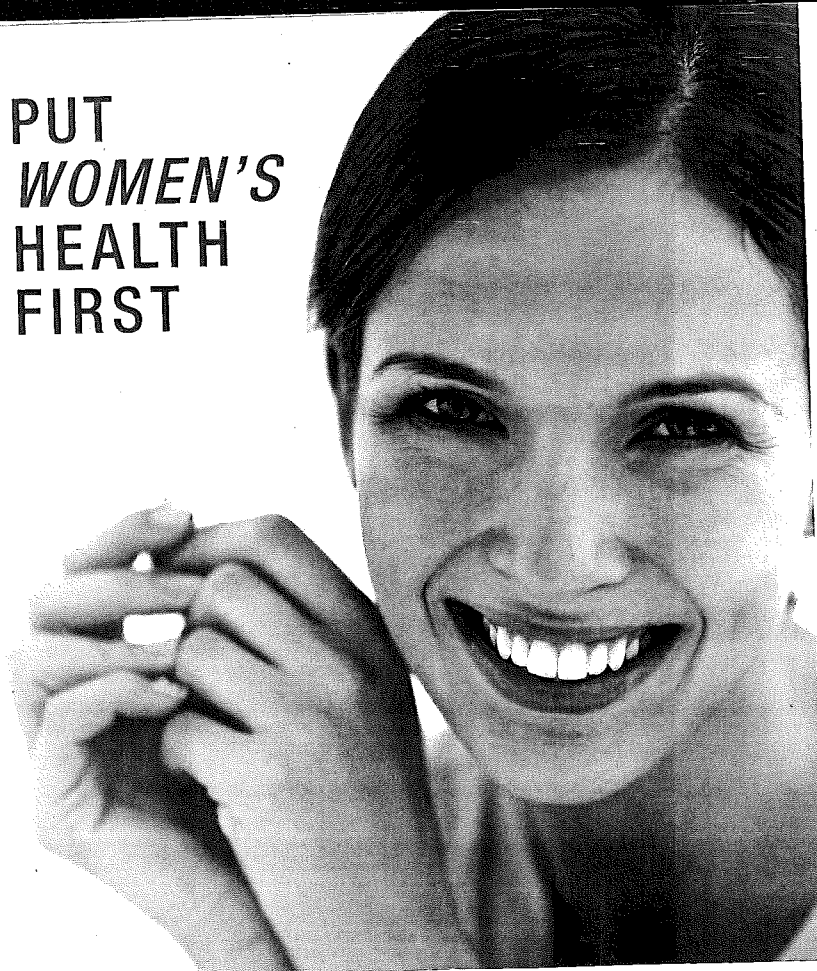
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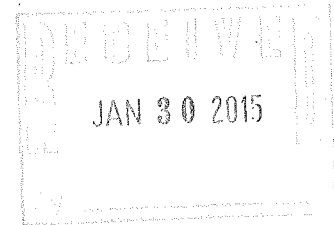
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FIRST NAME:

LAST NAME:

Jonathan Espitia

EMAIL: jon.espitia@gmail.com ZIP:

27707

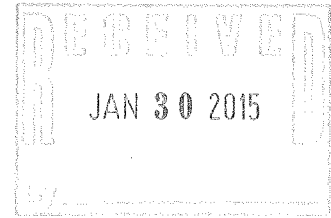
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I want to protect women's health and safety, and abortion care already is incredibly safe. The draft regulations proposed by the Department of Health and Human Services were written with extensive input from doctors, health care professionals and reproductive health experts, and they rely on evidence-based medicine. I urge the Department of Health and Human Services to continue to listen to medical experts and to support sensible regulations that put women's health first. The reproductive health centers affected by these draft regulations serve thousands of NC women and families and offer a wide range of essential reproductive health services, including family planning, cancer screenings and annual check-ups for reproductive health. The Department of Health and Human Services must put women's health and sound medical practices first when considering any changes to the draft regulations.

FIRST NAME:

Bailey

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bethridg@unca.edu 28801

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Optional Comment field:

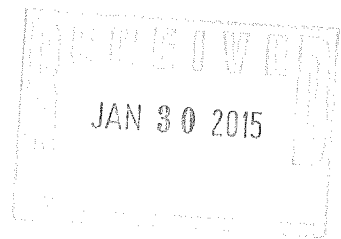
Thank you for prioritizing women's health, safety, and confidentiality!

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC



Planned Parenthood Health Systems  
Action Fund, Inc.



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FIRST NAME:

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Optional Comment field:

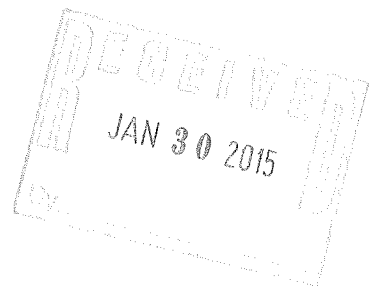
BC

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FIRST NAME:

Caleb

LAST NAME:

Ethridge

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ZIP:

27893

Optional Comment field:

CE

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Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

# TAKE ACTION!

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Put Women's Health First

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Name LYNN EVANS

E-mail address lynn.evans4@gmail.com

ZIP Code 27705

Additional Comments:

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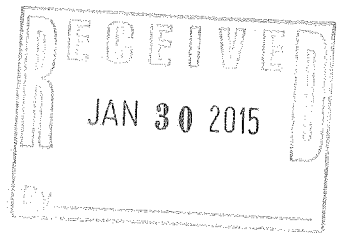
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NARAL  
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina



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Optional Comment field:

Yes, I would like to receive updates from organizations supporting this comment.

Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC