

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 Margaret Sale
E-mail address Margaretsale3@gmail.com
ZIP Code 27104

Additional Comments:

This is so
important!
Margaret

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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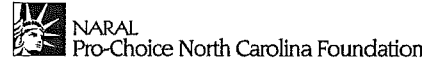
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Name Pam Salisbury
E-mail address psalisbury1@nc.rr.ca
ZIP Code 27526

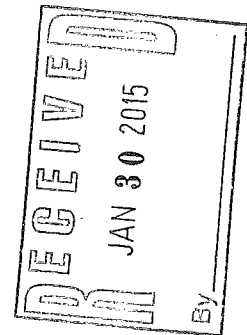
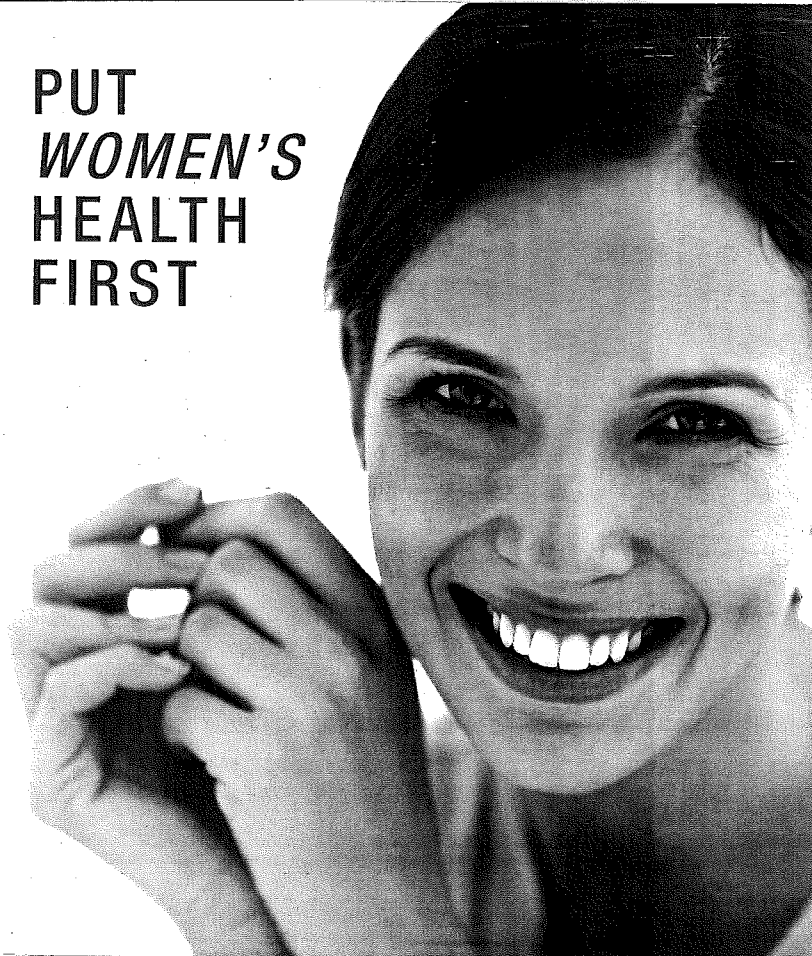
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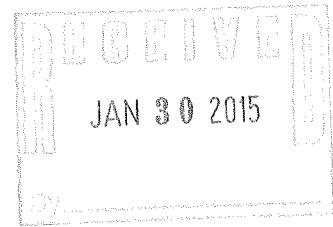
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Nadine Pfeiffer
Division of Health Service Regulation
2701 Mail Service Center
Raleigh, NC 27699-2701



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FIRST NAME:

LAST NAME:

Emily

Saloman

EMAIL:

ZIP:

esultana@gmail.com

27713

Optional Comment field:

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Name Takoma Sampson
E-mail address tazzytica@yahoo.com
ZIP Code 27613

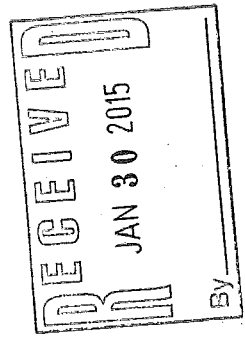
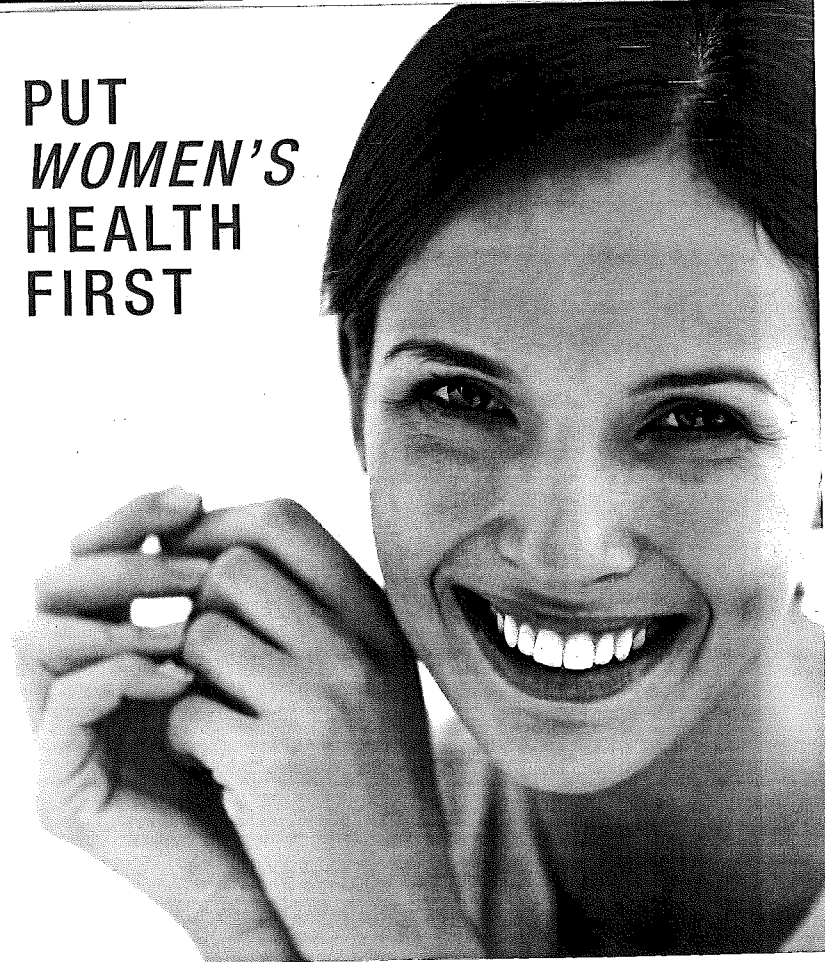
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Name Kamikh Sanders

E-mail address zenkiva@gmail.com

ZIP Code 27617

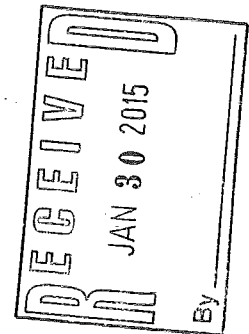
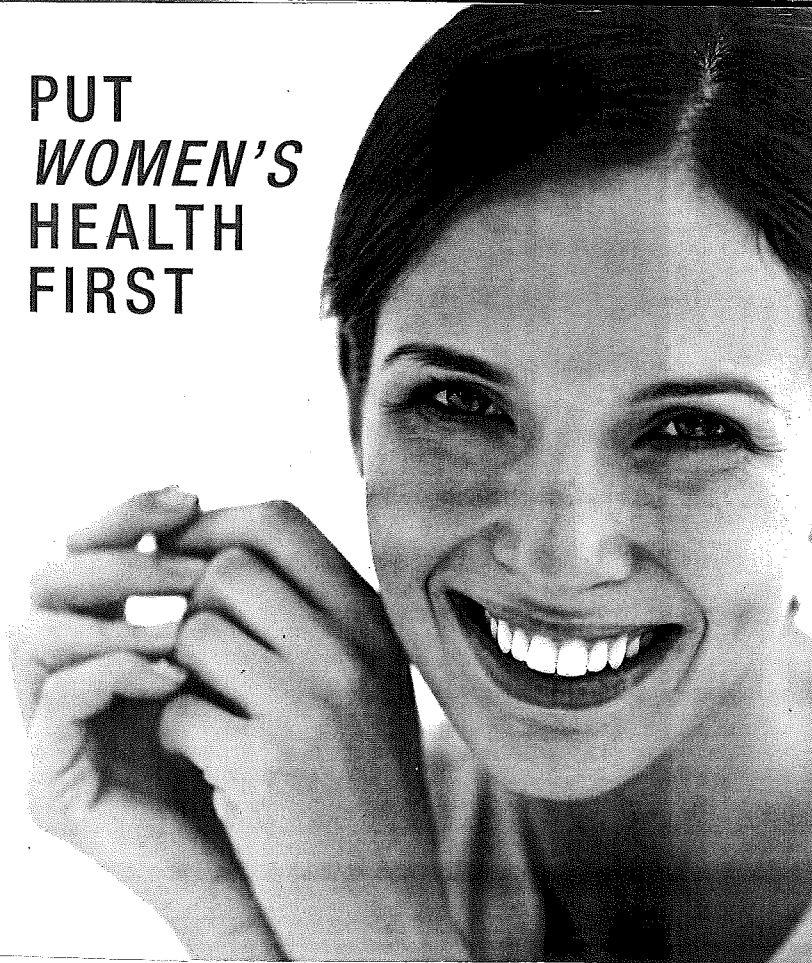
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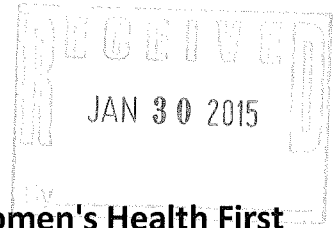
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FIRST NAME:

Leigh

LAST NAME:

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free2bleigh@hotmail.com

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27606

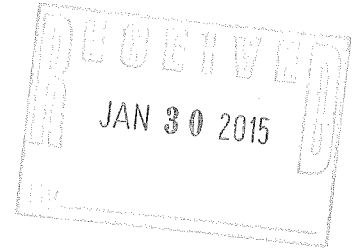
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FIRST NAME:

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hesi Sanders

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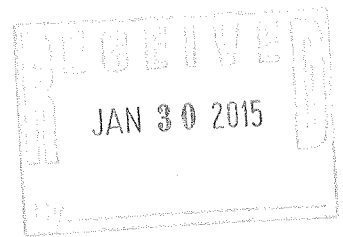
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FIRST NAME:

Ashley

LAST NAME:

Sanders

EMAIL:

ashleyimani@gmail.com

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28804

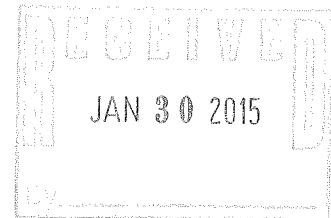
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FIRST NAME:

Avery

LAST NAME:

Sanders

EMAIL:

virtualgamecafe@uphoo.com

ZIP:

27707

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E-mail address dhrs500@charter.net
ZIP Code 27805

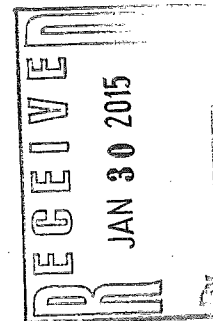
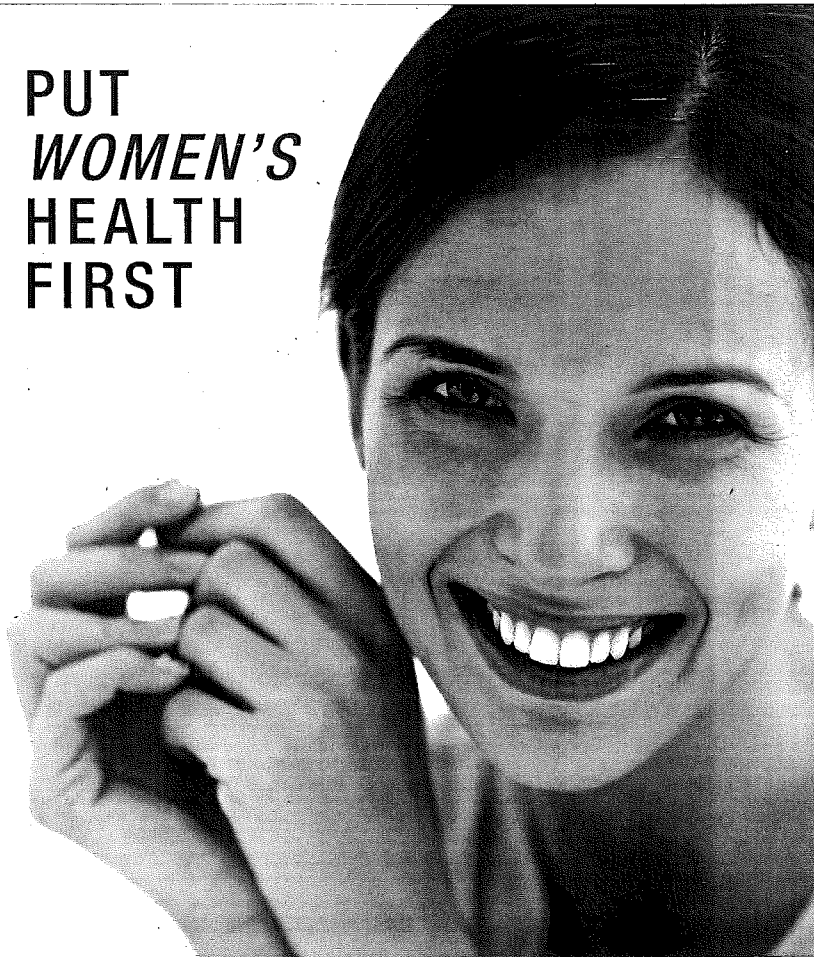
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Name Ally Samitelson
E-mail address allynsw@aimail.com
ZIP Code 27609

Additional Comments:

I would like to say
that I personally think
that it would not be
to the women's advantage
to put more restrictions
on abortion. It will make some
women do it on their own.
So just leave it so women can
be safe.

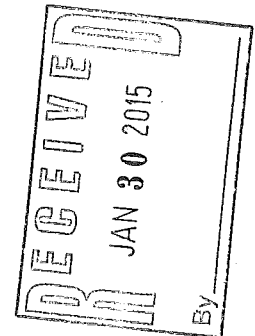
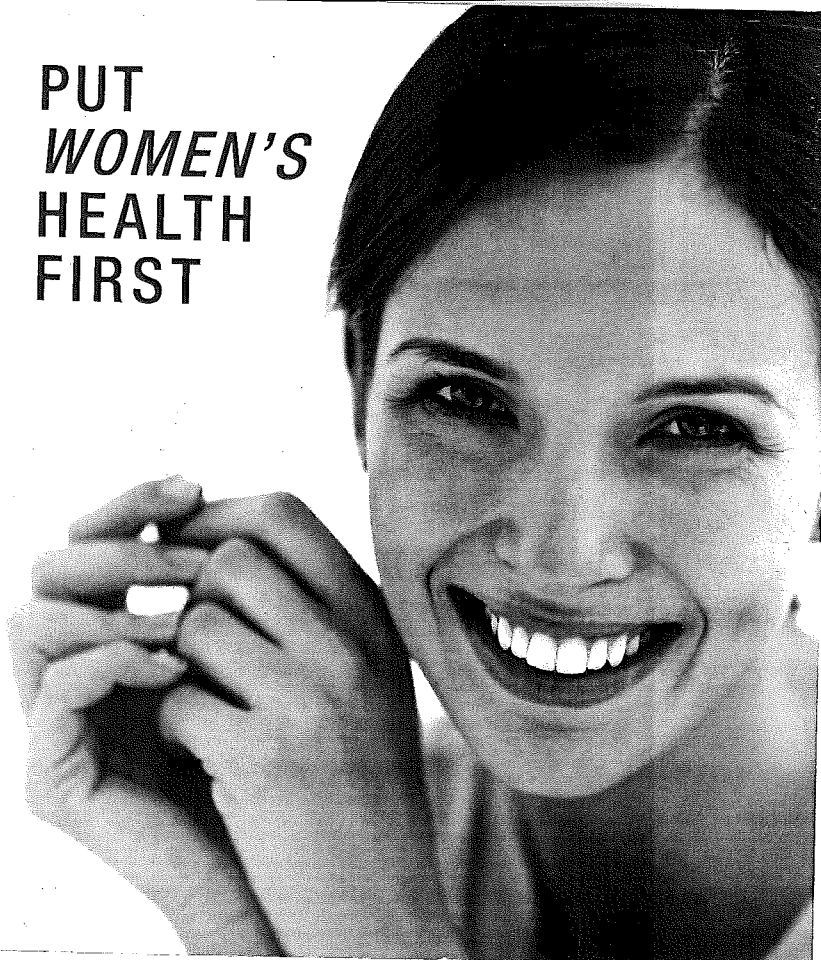
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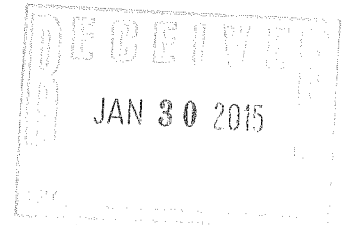
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FIRST NAME:

Jordan

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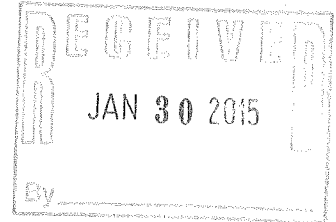
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FIRST NAME:

Anne Marie

LAST NAME:

Sapko

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ams91@podengo.com

ZIP:

27513

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Name Elizabeth Sapp

E-mail address _____

ZIP Code 27284

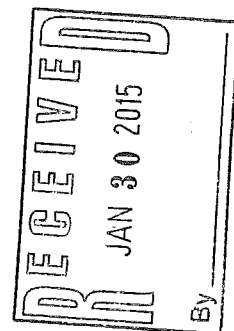
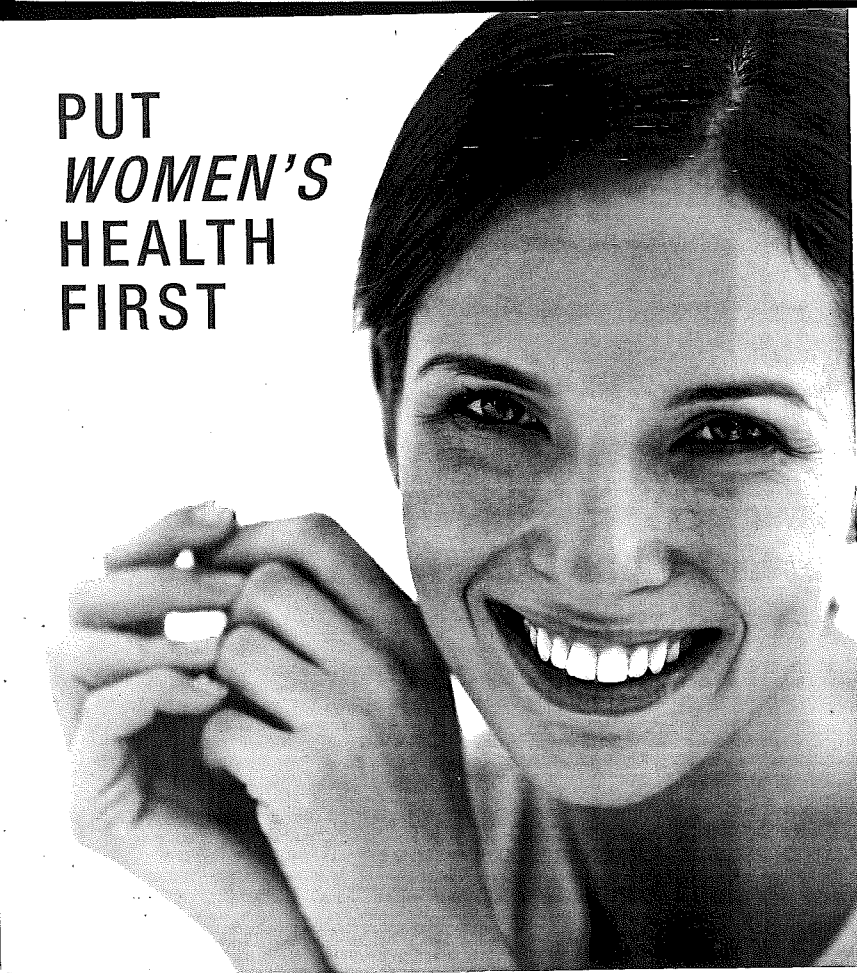
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Name Alex Sass
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ZIP Code 27607

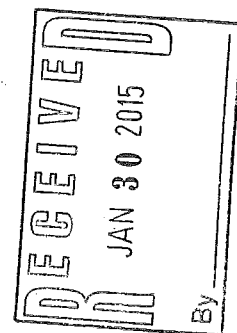
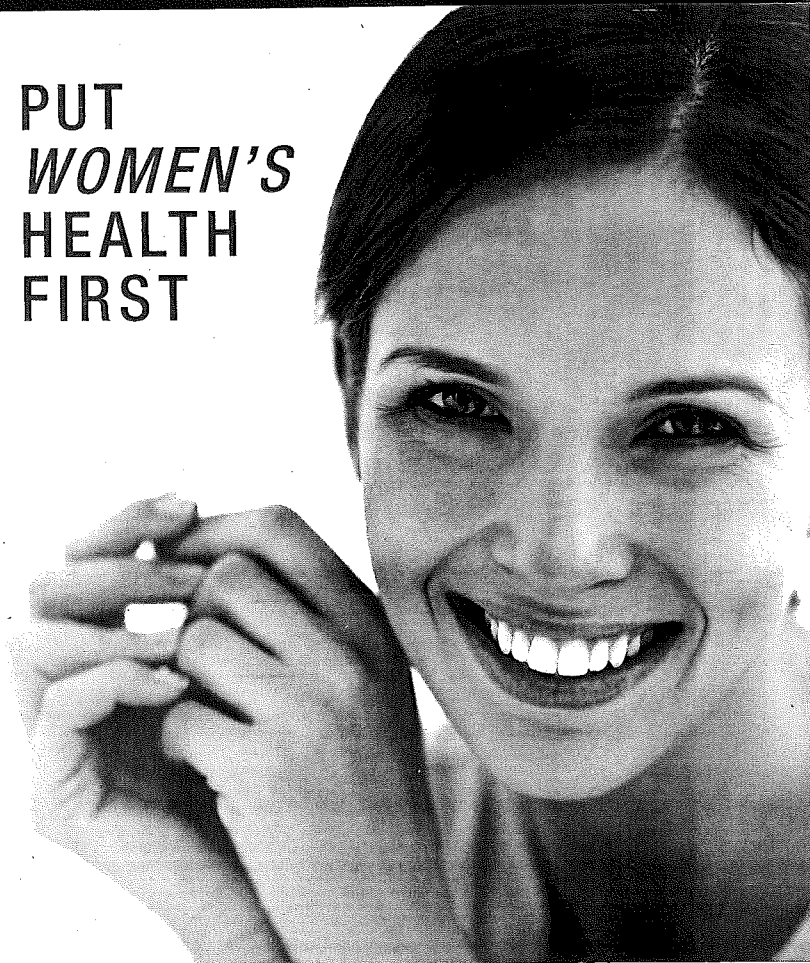
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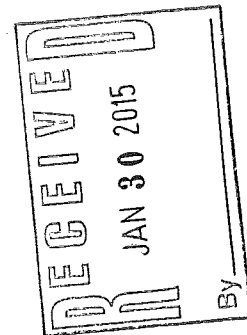
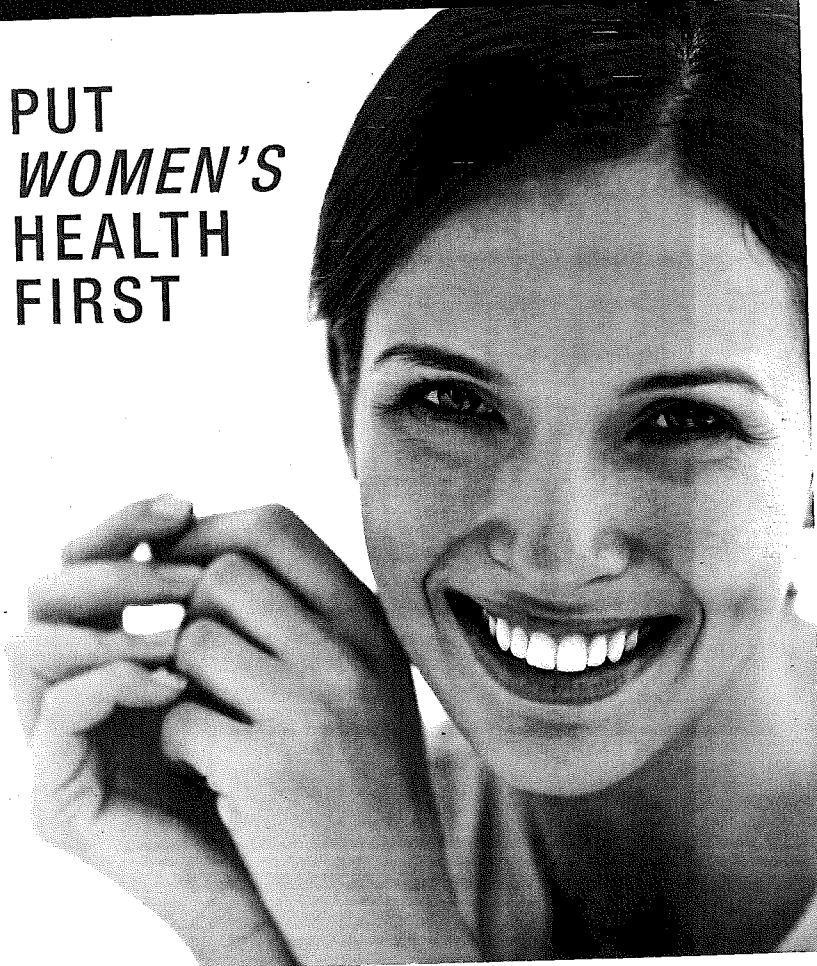
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Name Miranda Satterfield

E-mail address _____

ZIP Code 27715

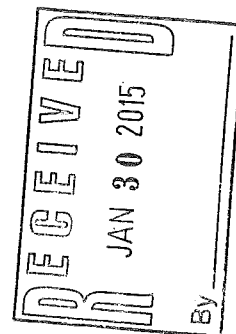
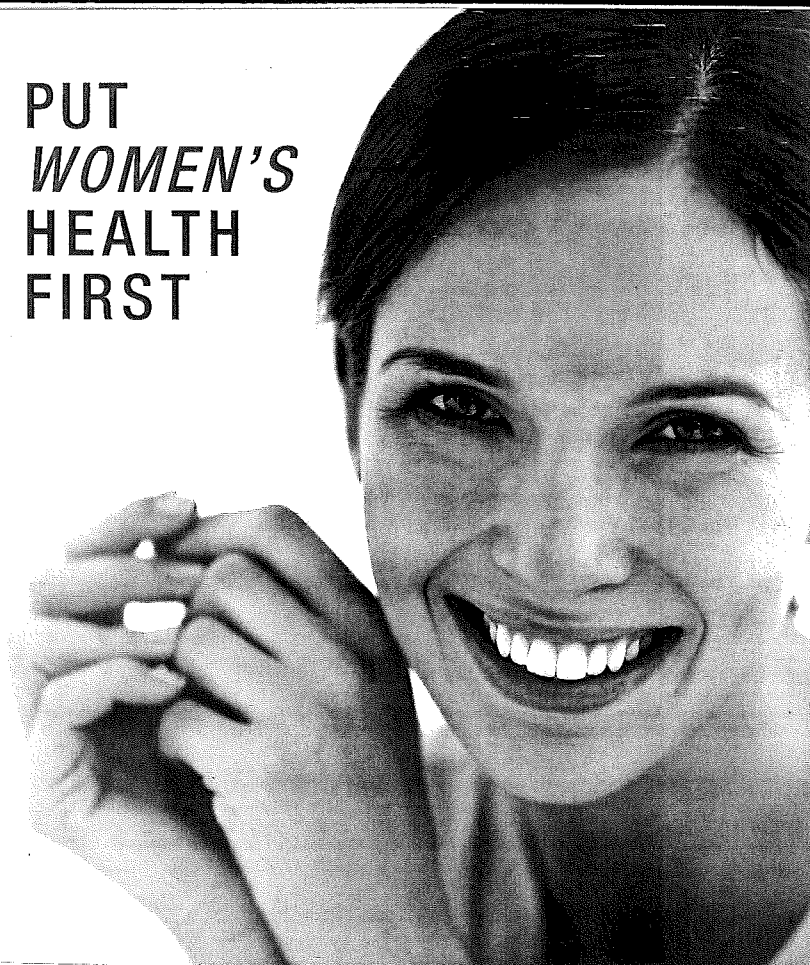
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Planned Parenthood Action Fund of North Carolina

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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 Davonia Saunders

E-mail address dsaunders@unca.edu

ZIP Code 27803

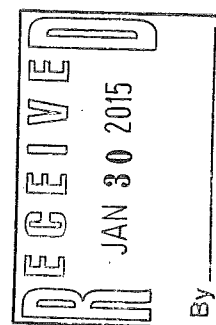
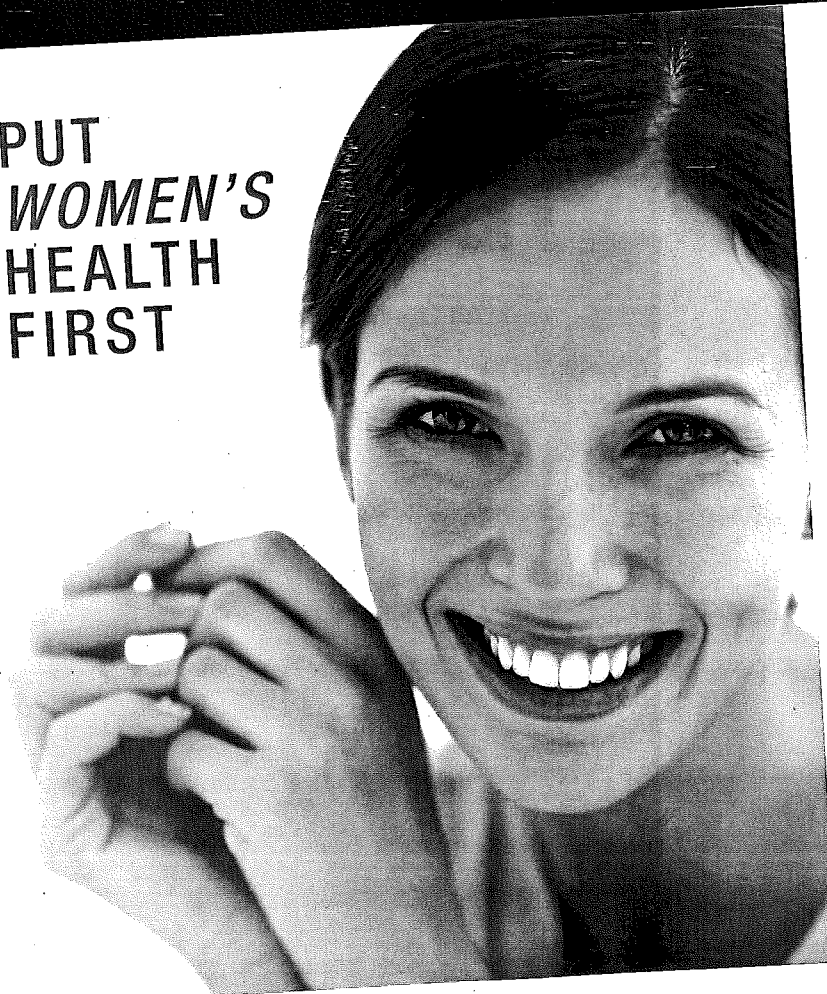
Additional Comments:

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Name Samantha Savery
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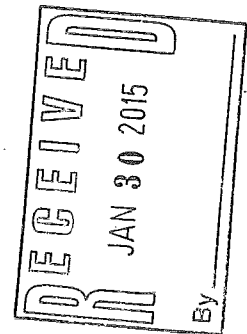
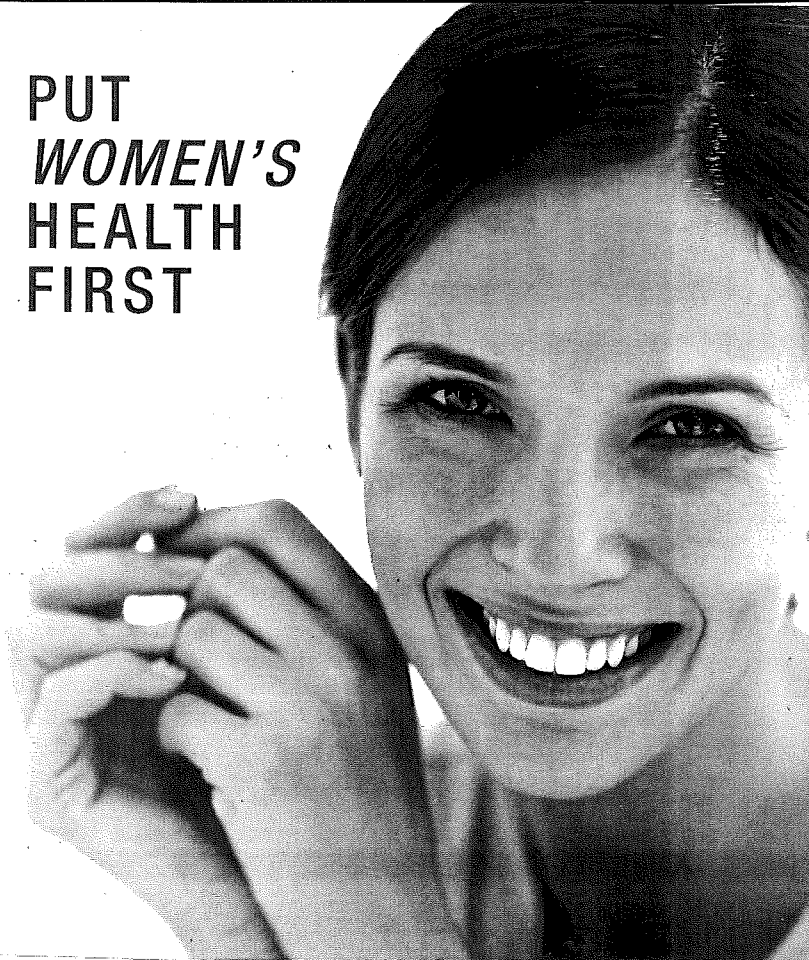


NARAL
Pro-Choice North Carolina Foundation



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Name Michael Schwabe

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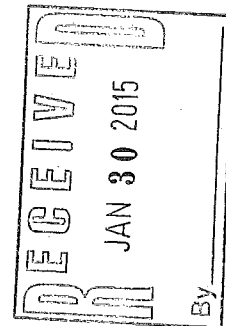
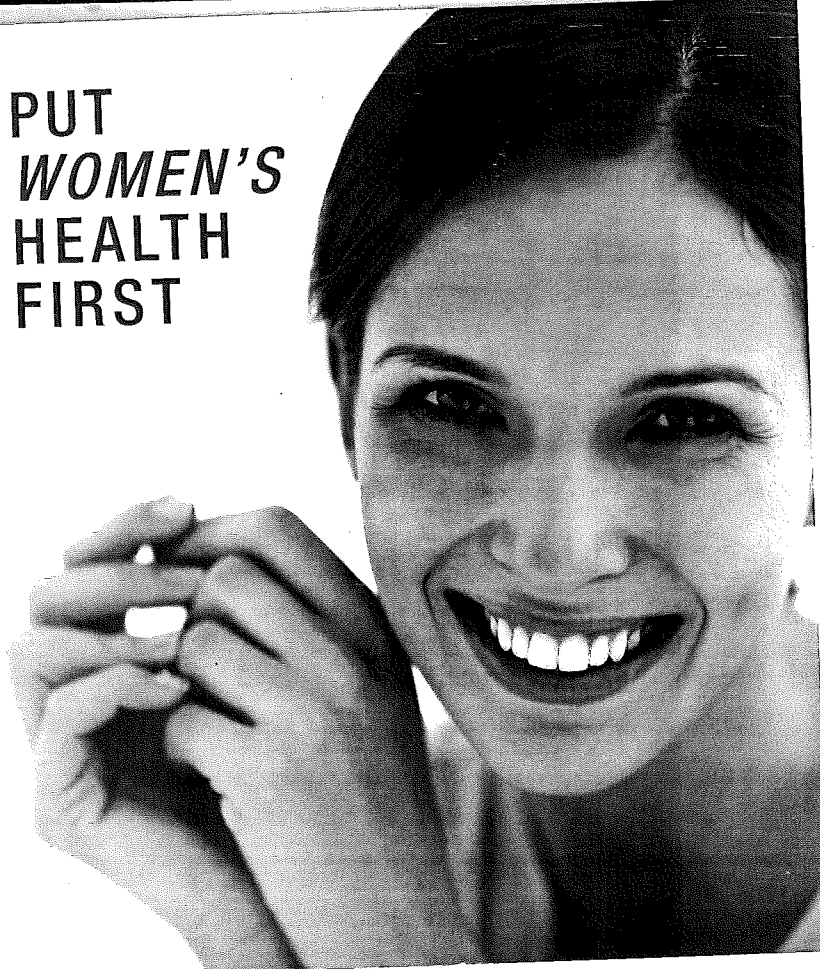
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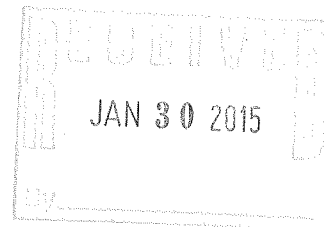
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Supporting Organizations: Planned Parenthood South Atlantic, Progress NC, ACLU of NC, NARAL Pro-Choice NC

PRO-LIFE ACTION LEAGUE

Joseph M. Scheidler, National Director ■ 6160 N. Cicero Ave. Chicago, IL 60646 ■ Telephone: 773-777-2900
Newsline: 773-777-2900 ■ Fax: 773-777-3061 ■ Website: prolifeaction.org ■ E-mail: info@prolifeaction.org

January 29, 2015

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

Dear Ms. Pfeiffer,

The Pro-Life Action League is pleased to provide comments and objections to the Proposed Rules governing abortion clinics. While best known for our vigorous defense of the lives of the unborn, we also have extensive experience with regard to the level of safety (or lack thereof) in abortion clinics with respect to the protection of the mother of the aborted child.

While to truly “do no harm” abortion would need to be banned entirely, we hope that we can contribute to a greater protection for the lives and health of women and somewhat reduce the harm done.

We are pleased that the North Carolina legislature took up the task of revising abortion clinic regulations. Informed consent is an important tool to prevent coercion, either by the relatives or friends of the mother or by the personnel in the clinic itself.

We are also pleased that the governing authority is more specifically spelled out, that the policies and procedures are to be documented and executed, and that inspections will be annual and as needed.

Before getting into greater detail, we would like to state **three major objections** to the Proposed Rules as currently constituted:

1. We object to the drastic reduction in the retention of medical records by the clinics, particularly as concerns minors.
2. We object to the removal of the rule that medical or nursing staff must accompany a transferred patient. This proposed change, combined with the provision of (a) not requiring a transfer agreement with a local hospital merely if an effort has been made

to secure one, and (b) no requirement that the physician be on staff of the local hospital, endangers women's health by providing them with no continuity of care.

3. We object to the "grandfathering" of clinics that don't meet the physical requirements.

Each of these objections will be explained in detail below, along with additional suggestions, comments, and complaints, in the order in which relevant sections appear in the Proposed Rules.

We would suggest additional definitions in .0101. "Physician" and "qualified person" are used in the body, but left undefined, along with other terms that require further definition. We would suggest amending 10A NCAC 14E.0111 (a) to read: "Any clinic certified by the Division to perform abortions shall be subject to unannounced inspections by authorized representatives of the Division annually and as it may deem necessary as a condition of holding such license."

While we believe that was the intention of this rule, spelling it out specifically would provide clarity. This is also important because of documented instances in recent years in which clinics in other states were tipped off that an inspection would be occurring the next day and clinic practice was modified specifically because inspectors would be present.

It is good that a plan of correction must be filed within 10 days of receipt of cited deficiencies, but we are greatly concerned that there are no consequences for failing to file a plan. In our experience, numerous clinics have "dragged their feet" for years simply because there were no legal consequences for doing so. The prospect of temporary closure would surely deter clinics from flouting this requirement.

We strongly object to the "grandfather" clause in 10A NCAC 14E .0201: Building Code Requirements. Applying the building code requirements only to "new clinics and to any alteration, repairs, rehabilitation work, or additions which are made to a previously certified facility" will not improve safety at all. In fact, it may actually *worsen* safety because a clinic may put off a needed repair or other work specifically to avoid having the section become applicable. Our experience has taught us that many abortion clinics do not desire to put any money toward the improvement of their building than they have to.

On July 1, 1994 the requirement for corridor width for clinic facilities was amended to be a minimum of 60 inches. But this was never enforced because a "new facility" was defined as one that was not certified as an abortion clinic as of that date. That means that many, perhaps most, clinics have been exempt from meeting the standard for over 20 years.

With this new definition of “new facility,” they will be grandfathered in again. When will the clinics be safe? Twenty years is far too long for a sensible medical standard to be ignored.

We further recommend that all of the ASF requirements be incorporated, including the provision that clinics must comply within one year. There are many types of ASFs, and they are all held to the same standards. From the state’s point of view, why should women seeking abortion be treated in facilities with lower standards than, for instance, a person seeking eye surgery or a colonoscopy? Given the number of ambulance transfers we observe at abortion clinics, our experience suggests that abortion clinics need to be held to the same high standards that all ASFs are.

Some building modifications need to be applicable immediately—for example, corridor width and emergency exiting. These can be critical in saving the life of a hemorrhaging patient. This section should be modified to meet the expectations of the legislature, not lowered to meet the demands of the abortion clinic owners.

We have several objections to the proposed changes in 10A NCAC 14E .0305: Medical Records. Paragraph (a) currently refers to “physician’s authenticated history and physical examination,” but in the proposed rules, it refers to “the patient’s history and physical examination.” Authentication should still be required. Patients deserve to know that their physicians have looked over their history and have personally examined them. This is not something less qualified persons should be allowed to do.

We can only charitably believe that paragraph (f) was misprinted. First, reducing the period that medical records must be retained from 20 years to 10 years is not in the interests of women. Often long-term consequences of undergoing an abortion procedure are not discovered until more than 10 years have passed. The woman who had an abortion at age 19 and then decided to wait until 30 to start her family, may not realize until then that her fertility was lost due to an abortionist’s negligence. But her records will have been destroyed. We urge you to restore the rule requiring 20 years retention.

More troubling, though, is the proposed rule regarding minors’ medical records. According to the proposed rules, her records may be destroyed when she turns 21. A minor girl could get an abortion at 17 and then have her records destroyed only four years later—even fewer than the already inadequate 10 years the Proposed Rules require for adult women. We believe the DHSR meant to say that the 10 year period would *start* when a woman turns 21, but that is not how the proposed rules read. We suggest that the language be changed to require that medical records be retained for 20 years after a minor turns 21. That would give a woman ample time to look into her medical records, should she so choose. There is no good reason for shortening the period unless the purpose of the rule change is to lessen abortion clinics’ liability. We doubt that was the intent of the legislation.

Again in paragraph (h), record preservation for closed abortion clinics has been reduced from 20 to 10 years. We would ask you to retain the 20 years requirement. Again, the rule as currently proposed does nothing to enhance the rights of women, but only reduces the time the clinics have to worry about facing liability. The purpose of these rule modifications is not to protect the abortion clinics, but to reasonably protect women.

Consider ASF rule 10A NCAC 13C .1002(d), which states, “For licensing purposes the length of time that medical records are to be retained is dependent upon the need for their use in continuing patient care and for legal, research, or educational purposes. The length of time shall not be less than 20 years.” We would suggest that women undergoing abortion need a longer time than most patients due to their situation, not a shortened time. Because of the abortion, a woman may decide to put off childbearing for years—easily 10 years or more—and would not be aware of fertility problems directly attributable to the abortion until some time later when she failed to achieve a pregnancy.

Retaining records until a woman is at least 38 poses little inconvenience for the abortion clinic, but provides necessary information for those women injured in the process. Again, we find no evidence in the legislation that the intent was to strip these women of this vital information.

We have some concern about the lack of consumer protections that are found in ASF rules 10A NCAC 13C .0205, but have no particular suggestions and acknowledge that this may lie outside the scope of the legislation.

We commend you for Section .0302 outlining the Governing Authority. It follows the ASF rules. However, we suggest that .0303(a)(3) be amended by removing “if applicable” since in .0302 (d)(2), minutes of the annual meetings are maintained even in the event that the governing authority is an individual. This diverges from the ASF rule, and could lead to problems. For example, the former Femcare abortion facility in Asheville, an ASF, did not review its policy and procedure manual for *23 years*. Thus, we suggest maintaining the requirement of minutes for all governing authority meetings, even in the event that the governing authority is an individual. We also recommend that the governing authority be responsible for building and equipment maintenance and maintenance logs.

We are pleased with the Personnel Records (.0306) and the Nursing Services (.0307) rules changes.

The addition of the Quality Assurance requirements in 10A NCAC 14E .0308 is also commendable. This is important for any abortion clinic where procedures are done without regard to evaluating results, complications, or improvement. Rigorous enforcement is

necessary, since in our experience it is difficult to foster the attitude changes required on the part of abortion clinic staff to engage in critical self-assessment.

Regarding 10A NCAC 14E .0309 (b), there is essentially no requirement for a pathological examination of tissue because it is left up to the governing body to determine whether an exam is necessary. This is a clear example of allowing the fox to guard the hen house, particularly since in the original language in 10A NCAC 14E .0311 (b)(2), equipment for microscopic examination was required—but that language has been deleted. Without microscopic examination, detection of ectopic pregnancies, incomplete abortions, and other complications is compromised, to the detriment of women’s safety.

As mentioned above, in 10A NCAC 14E .0310 (c) Emergency Back-Up Services, the good rule of a written transfer agreement with a nearby hospital is totally undone by the provision that mere “documentation of its efforts to establish such a transfer agreement with a hospital” counts as compliance. In speaking with representatives of the Department, we have not received the name of a single ASF that does not have a transfer agreement. While this exception is found in the ASF rules, it apparently has never been utilized. If this exception is allowed for abortion clinics, we fear that it will be utilized widely, possibly by every clinic, thus completely undermining the goal of protecting women’s health.

Women’s safety is further undone with 10A NCAC 14E .0313(c), which was deleted in the proposed rules. If adopted, North Carolina law would no longer require an attending medical or nursing staff member to accompany a non-ambulatory patient during any transfer. Taken together with the previous proposed rule, this provision would allow for a hemorrhaging patient to be sent unaccompanied to a hospital that has no formal relationship with the clinic. This is dangerous. It is not what anyone would desire for their loved one.

Perhaps the reason that Paragraph .0310(c) was deleted can be found in the deficiency report dated December 11, 2012 for A Preferred Women's Health Center in Charlotte. That deficiency report referred to two patient transfers in the previous four months, both of which were sent unaccompanied by ambulance. The response of the RN on duty was, “I can not leave, I am the only nurse here.” Neither did the physician accompany the patient.

With the proposed rules changes, instead of being cited for a deficiency, the clinic would be in compliance—to the detriment of patient care. Again, this rule change serves only the abortion clinic, not the safety of patients. Therefore, we urge you to restore the rule for requiring accompanied transfers, and that you require transfer agreements. If the abortion clinics have insufficient professional staff, they should hire more staff to ensure they have qualified personnel available to accompany patients being transferred by ambulance. This lack of qualified personnel would not be tolerated in any other medical setting. If a clinic

cannot make an agreement with a nearby hospital, then abortions, or any surgeries, should not be performed there.

Regarding .0310(d), we would like to see more specific provisions for emergencies—specifically, requiring a laryngoscope, an appropriate selection of endotracheal tubes, and pulse oximeters in addition to the other interventions.

I hope that these comments submitted on behalf of the Pro-Life Action League are well received. If you have any questions or would like any supporting materials regarding our experience in other states with abortion clinic inspections and regulations, please feel free to contact me.

Sincerely,

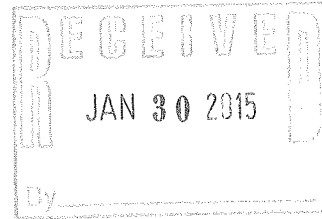
A handwritten signature in blue ink that reads "Eric J. Scheidler". The signature is written in a cursive, flowing style.

Eric J. Scheidler
Executive Director

Submitted by Email



Planned Parenthood Health Systems
Action Fund, Inc.



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FIRST NAME:

Linda

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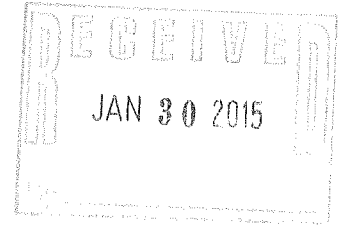
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28711

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Name Dana Schlanger

E-mail address _____

ZIP Code 27806

Additional Comments:

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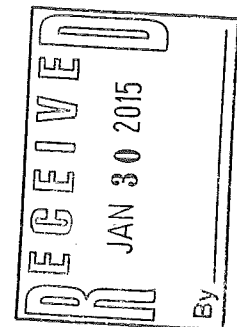
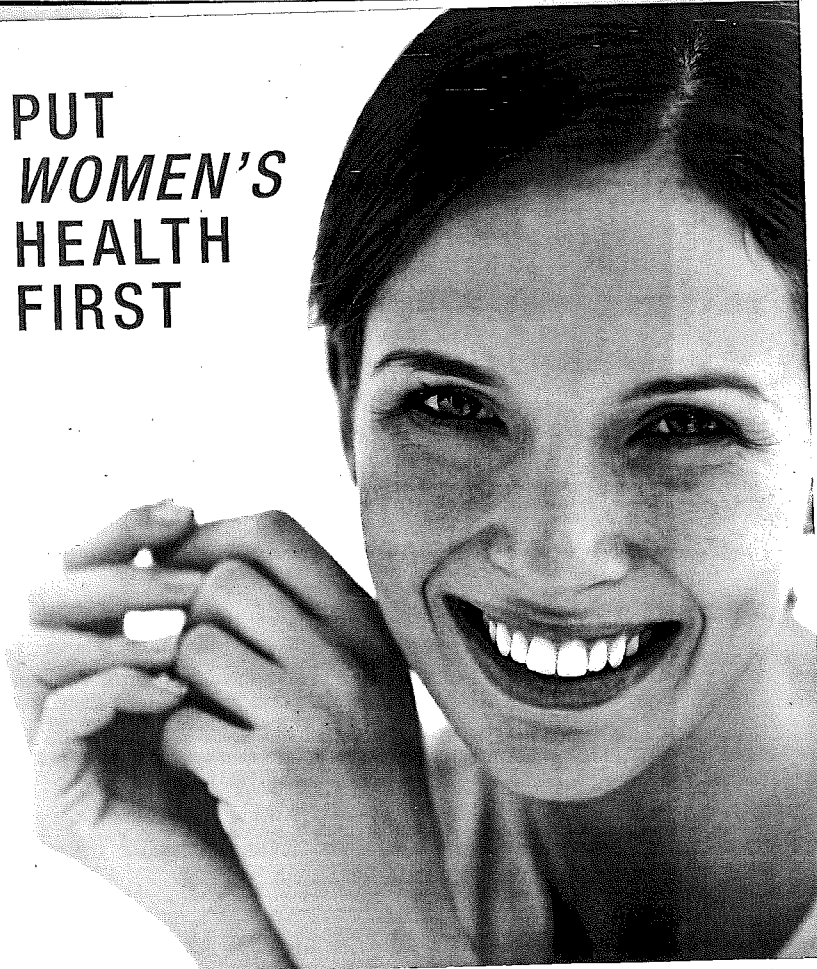


NARAL
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Planned Parenthood Action Fund of North Carolina

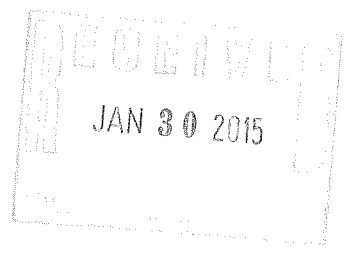
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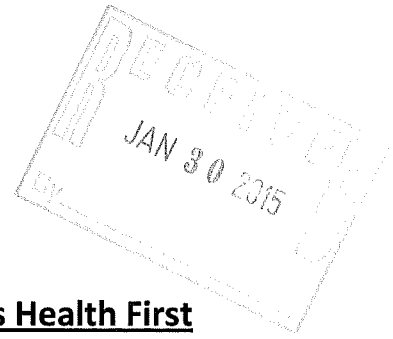
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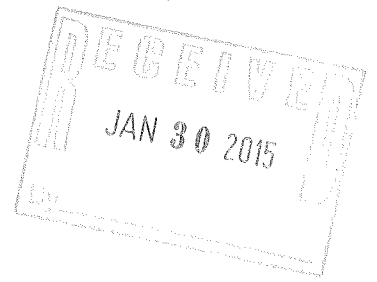
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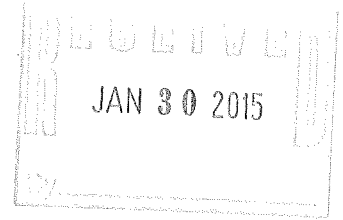
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FIRST NAME:

LAST NAME:

Cara

Schumann

EMAIL:

ZIP:

Carabeara.18@gmail.com 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

TAKE ACTION!

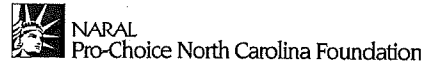
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Name Sondra Schutz
E-mail address Sondraschutz@gmail.com
ZIP Code 27511

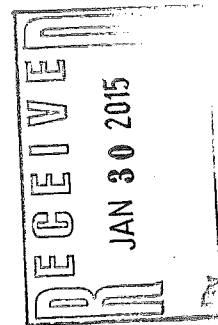
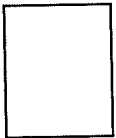
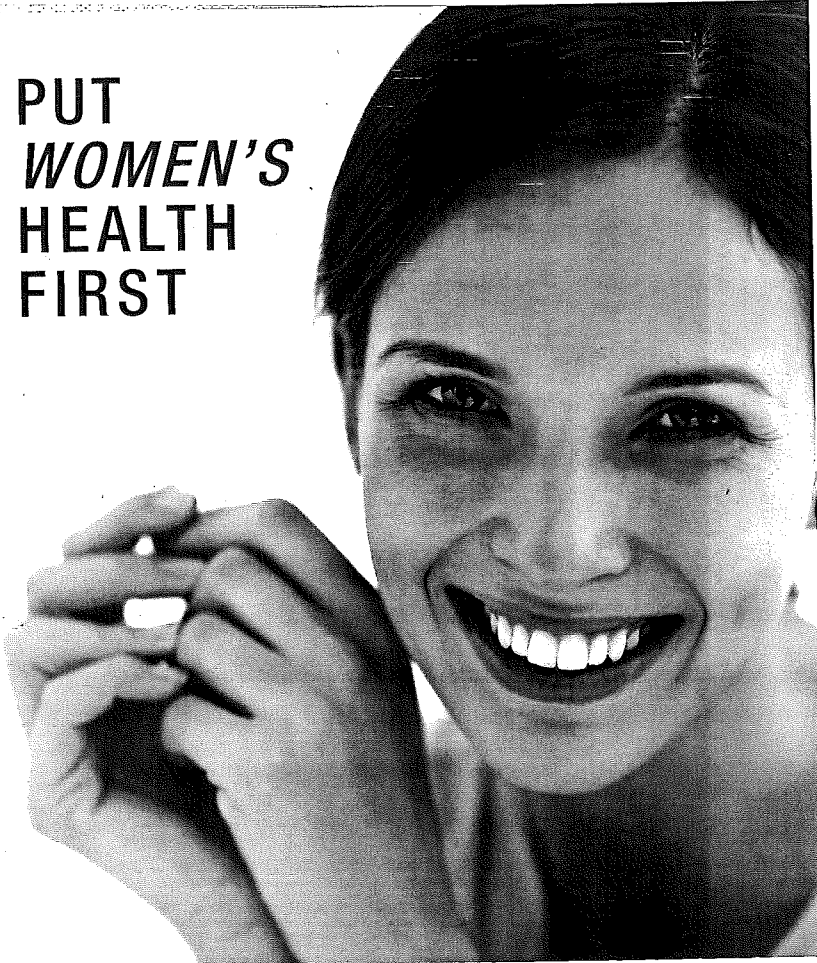
Additional Comments:

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Planned Parenthood Action Fund of North Carolina

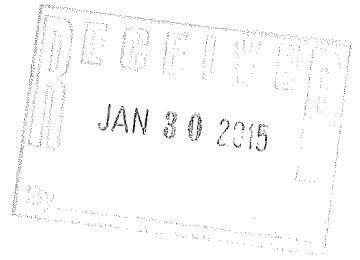
PUT
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Nadine Pfeiffer
Division of Health Service Regulation
2701 Mail Service Center
Raleigh, NC 27699-2701



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FIRST NAME:

Loene

LAST NAME:

Schweins

EMAIL:

ZIP:

27539

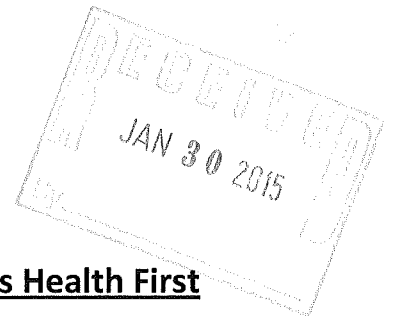
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FIRST NAME:

Renee

LAST NAME:

Seikel

EMAIL:

reneesas@hotmail.com

ZIP:

27519

Optional Comment field:

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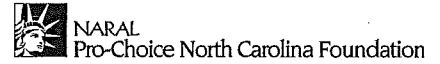
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Name David Scott
E-mail address dscott0111@gmail.com
ZIP Code 27615

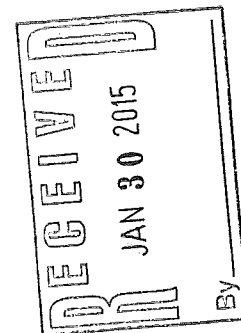
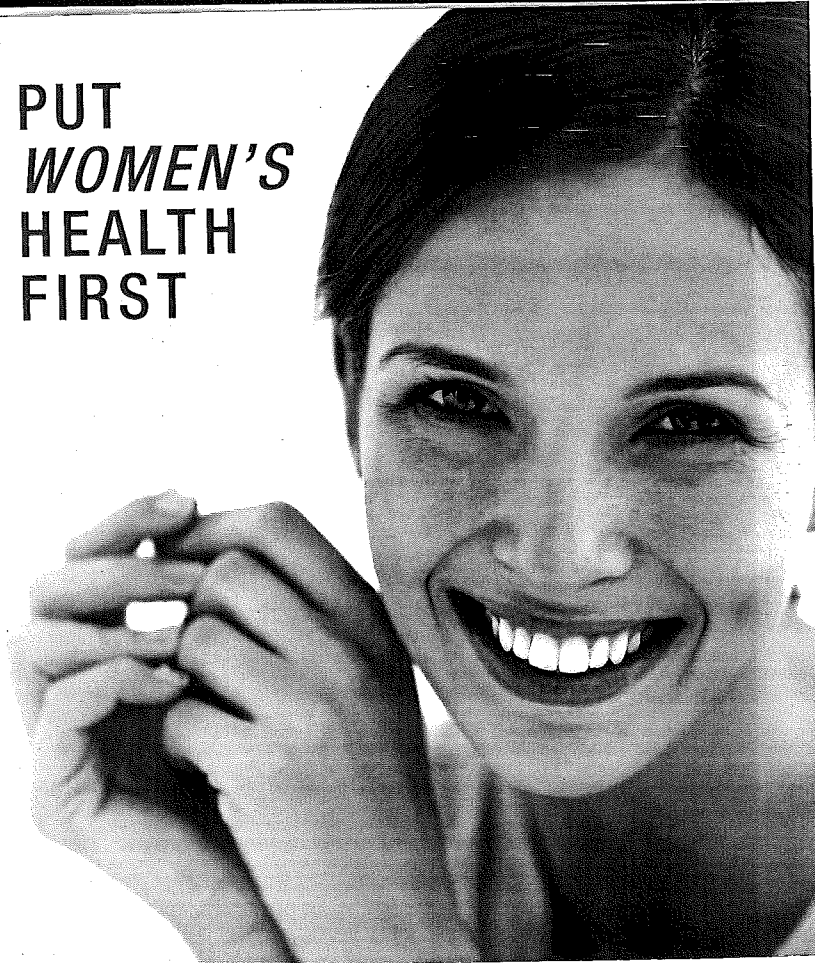
Additional Comments:

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



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 Heather Scott

E-mail address heathers@montreat.org

ZIP Code 28757

Additional Comments:

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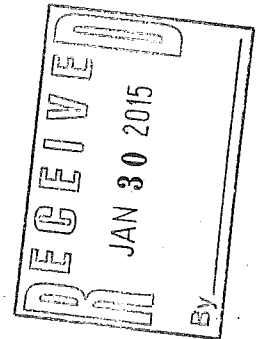
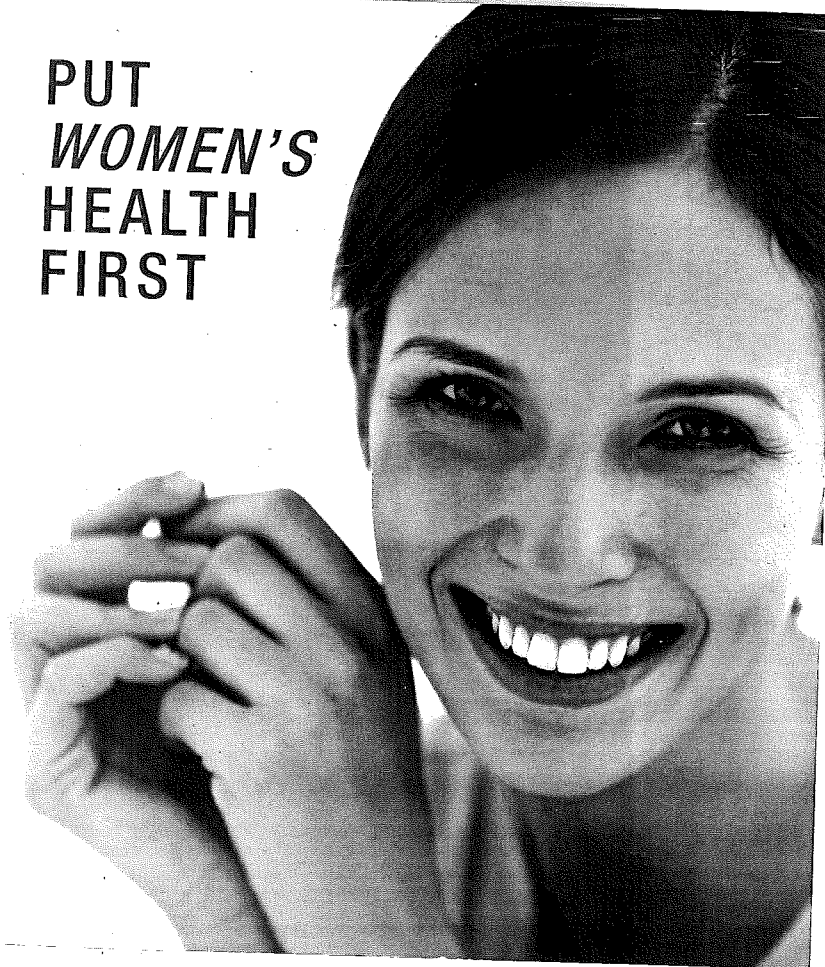


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Name Beth Seosky

E-mail address _____

ZIP Code 27605

Additional Comments:

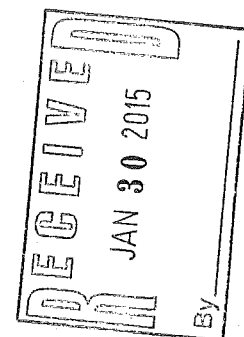
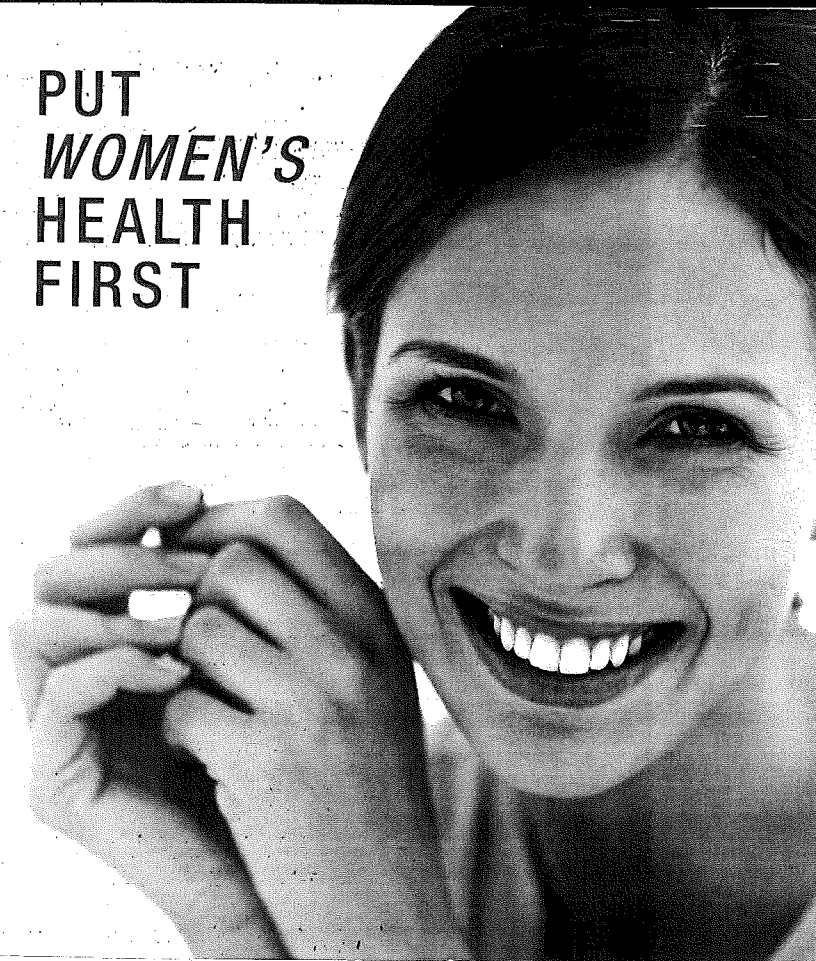
Keep abortions
safe & legal.

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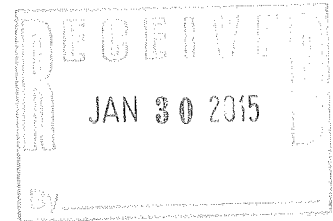
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FIRST NAME:

LAST NAME:

Robin

Seila

EMAIL:

ZIP:

robin.scila@gmail.com 27701

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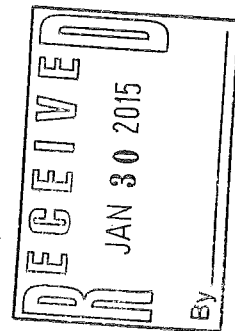
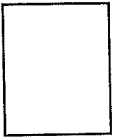
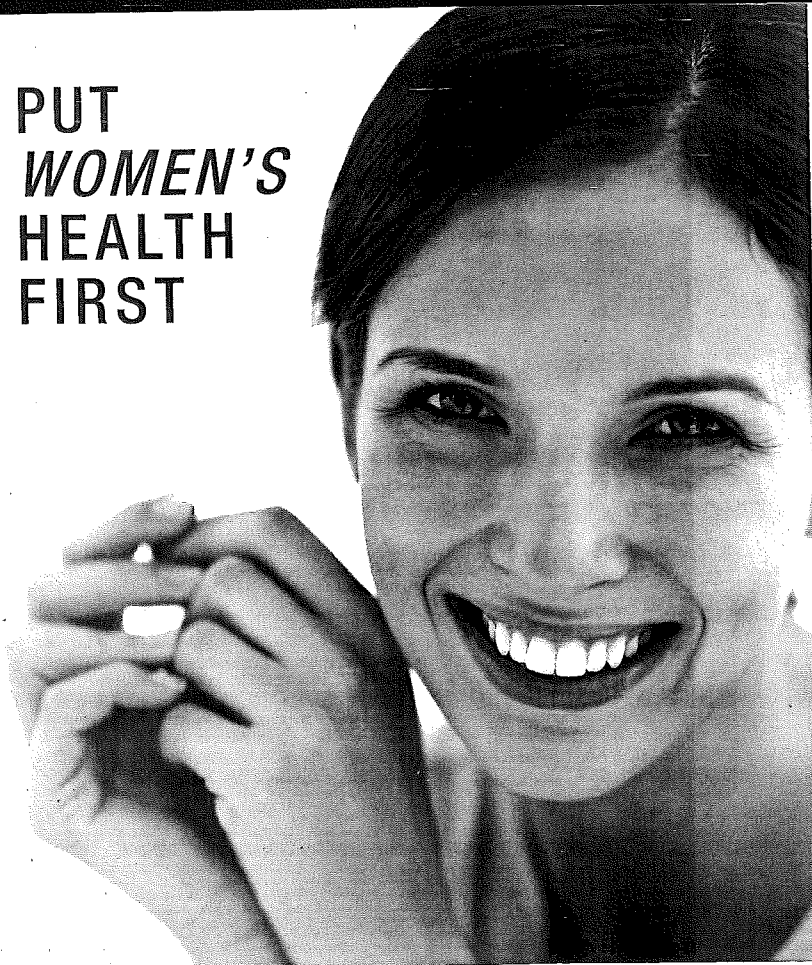
Name Lisa Sellers
E-mail address lisasellers@gmail.com
ZIP Code 28716
Additional Comments:

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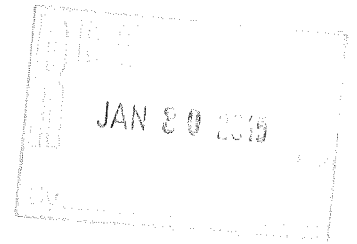
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FIRST NAME:

Lisa

LAST NAME:

Semmens

EMAIL:

lois.semments@kingfirm.com

ZIP:

27540

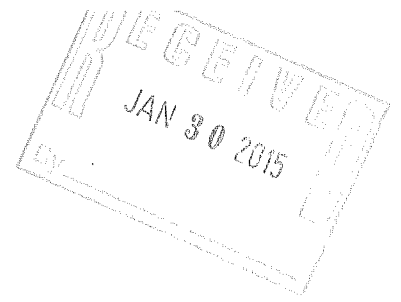
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FIRST NAME:

LAST NAME:

Tamara

Serapio

EMAIL:

ZIP:

pserapio27@msn.com 28806

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Name Serona Sabring

E-mail address Serona@Southemers
onnewgrounds.org

ZIP Code 27701

Additional Comments:

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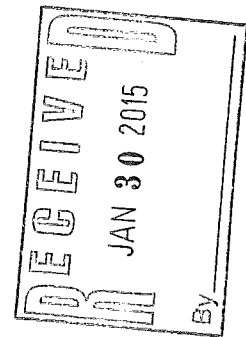
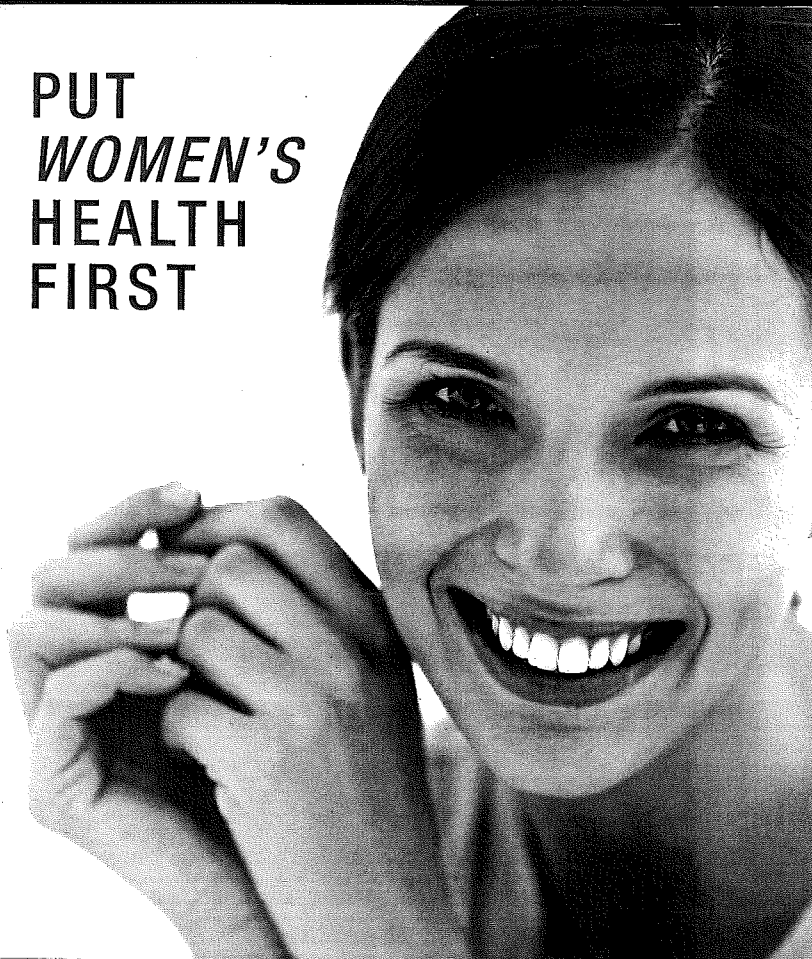


NARAL
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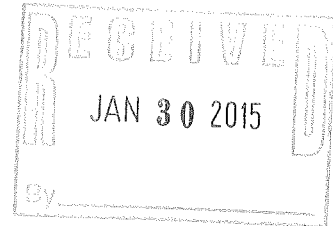


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FIRST NAME:

LAST NAME:

Anne Barrett

Seripa

EMAIL:

ZIP:

~~XXXXXXXXXX~~

asekta50@

bellsouth.net

28805

Optional Comment field:

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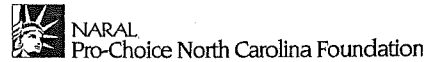
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Name Sam Sgro
E-mail address ~~Sam Sgro~~ samsdro@gnail.com
ZIP Code 27303

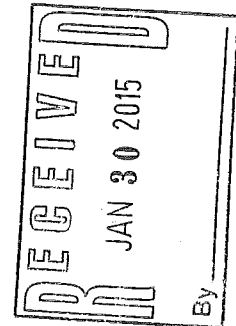
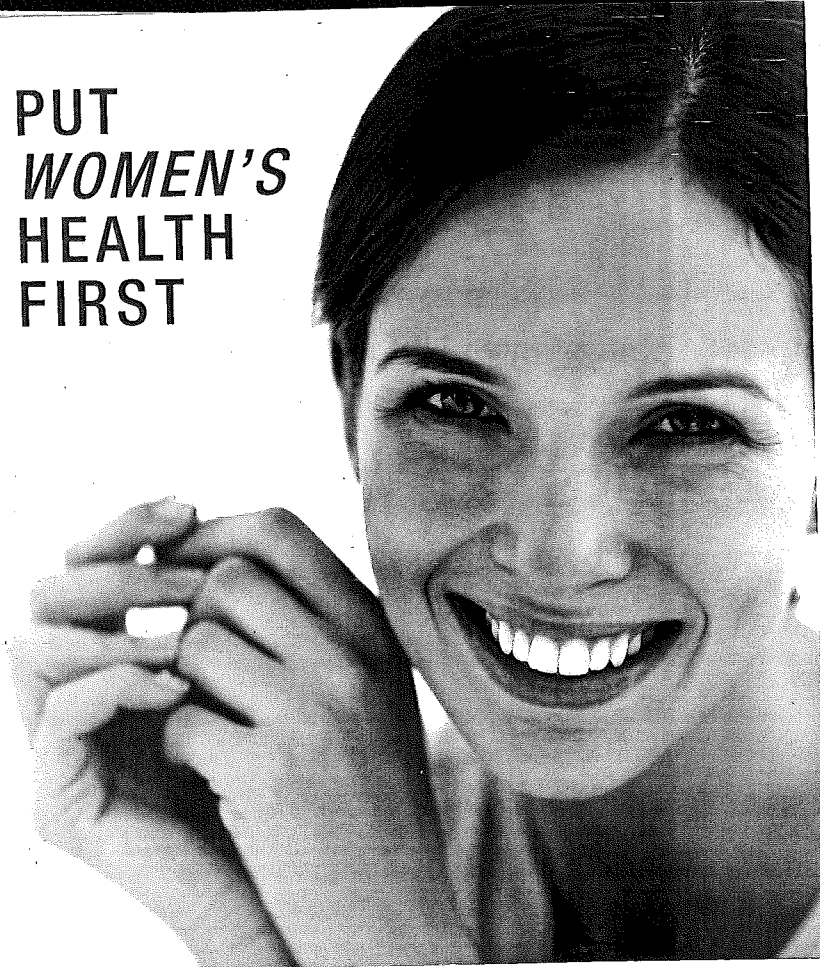
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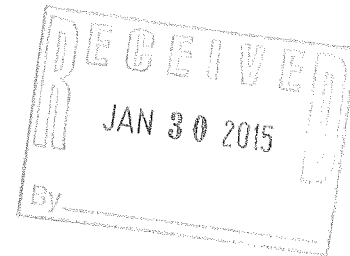
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FIRST NAME:

LAST NAME:

mary

Shadbolt

EMAIL:

ZIP:

marytshad@gmail.com 27513

Optional Comment field:

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Name Rex Shaffer

E-mail address rshaffe@yahoo.com

ZIP Code 2804

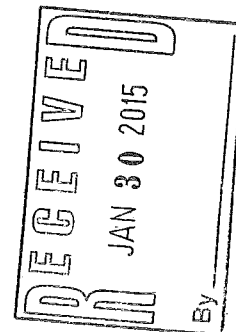
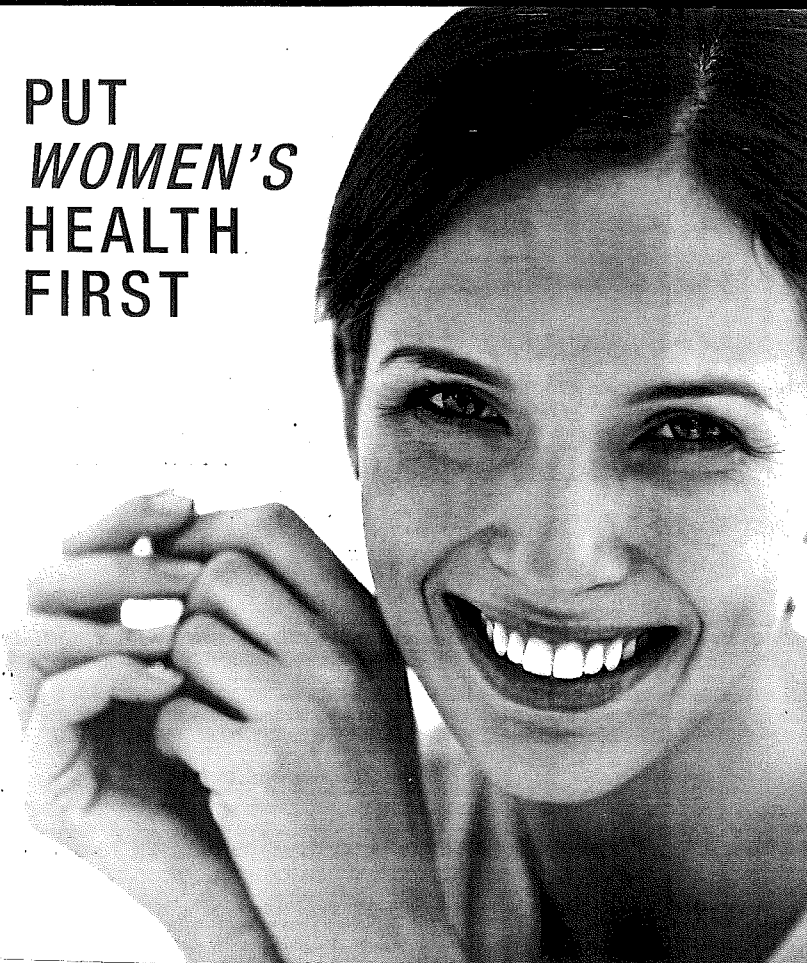
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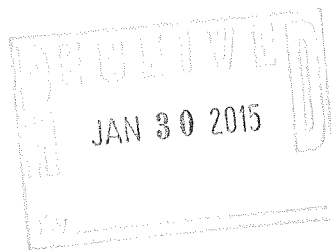
PUT
WOMEN'S
HEALTH
FIRST



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

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FIRST NAME:

Arthur

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Shain

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27516

Optional Comment field:

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

AS

TAKE ACTION!

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Name KRITI SHARMA

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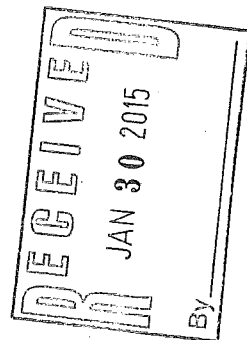
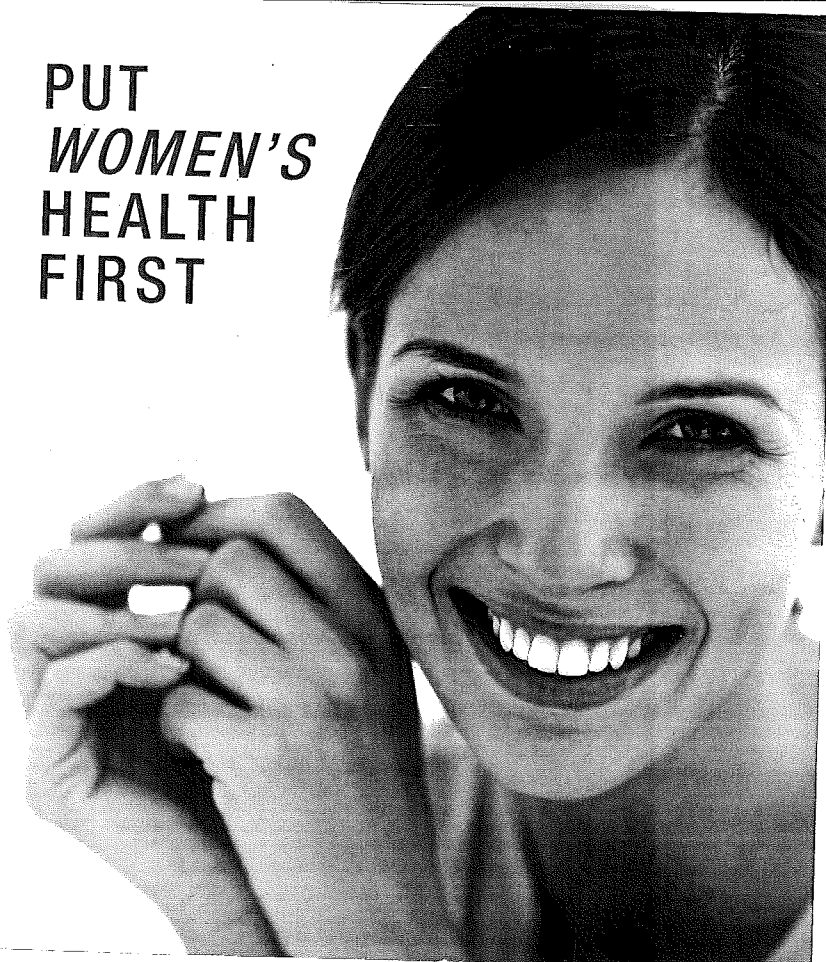
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Name Mona Sharma

E-mail address msharma3551@gmail.com

ZIP Code 27214

Additional Comments:

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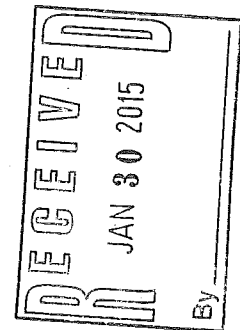
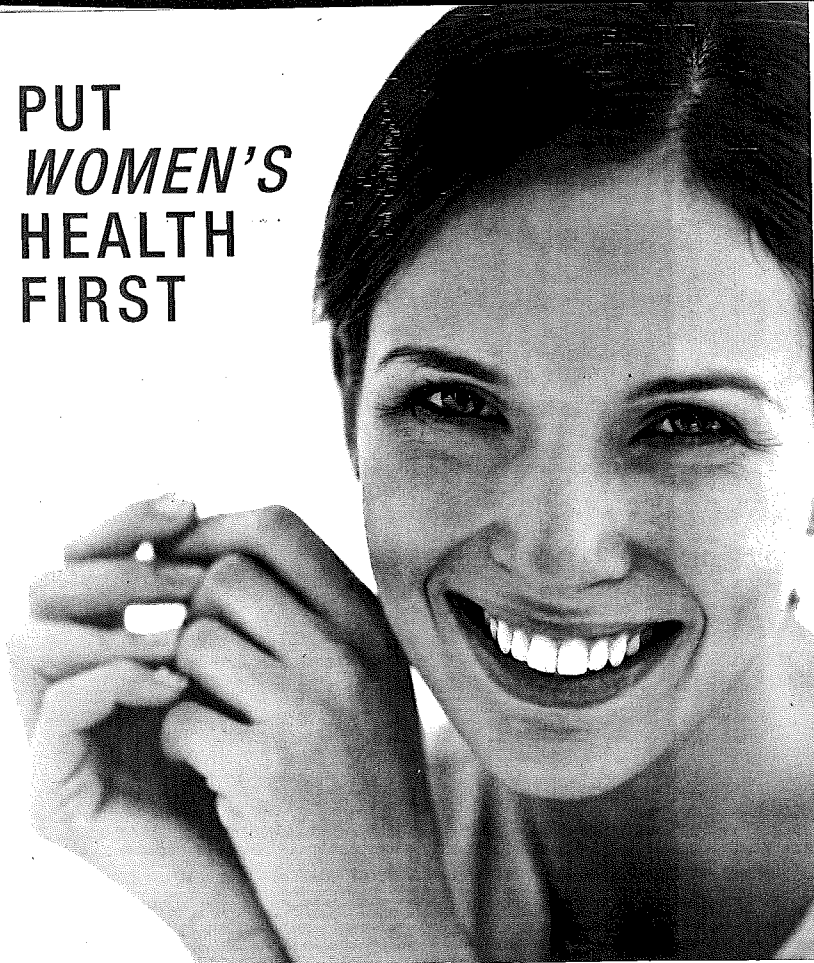


NARAL
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

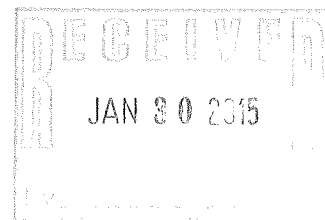
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FIRST NAME:

Marci

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Shealy

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marcishealy@gmail.com

ZIP:

28207

Optional Comment field:

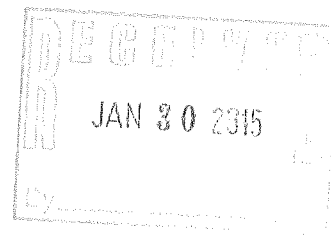
The decision should be between a woman and her doctor. Politicians should not be seeking restrictions on women's health!

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:

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James Sheeler 

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sheelerjc@att.net

Optional Comment field:

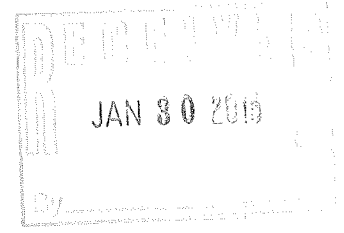
This is common sense and fair.

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FIRST NAME:

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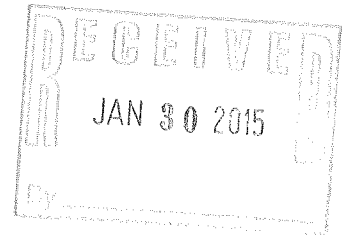
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FIRST NAME:

LAST NAME:

Kirsten Elizabeth Sherk

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Kirsten.Sherk@gmail.com 27701

Optional Comment field:

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Name Jill Sherling
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Additional Comments:

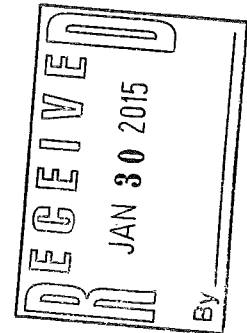
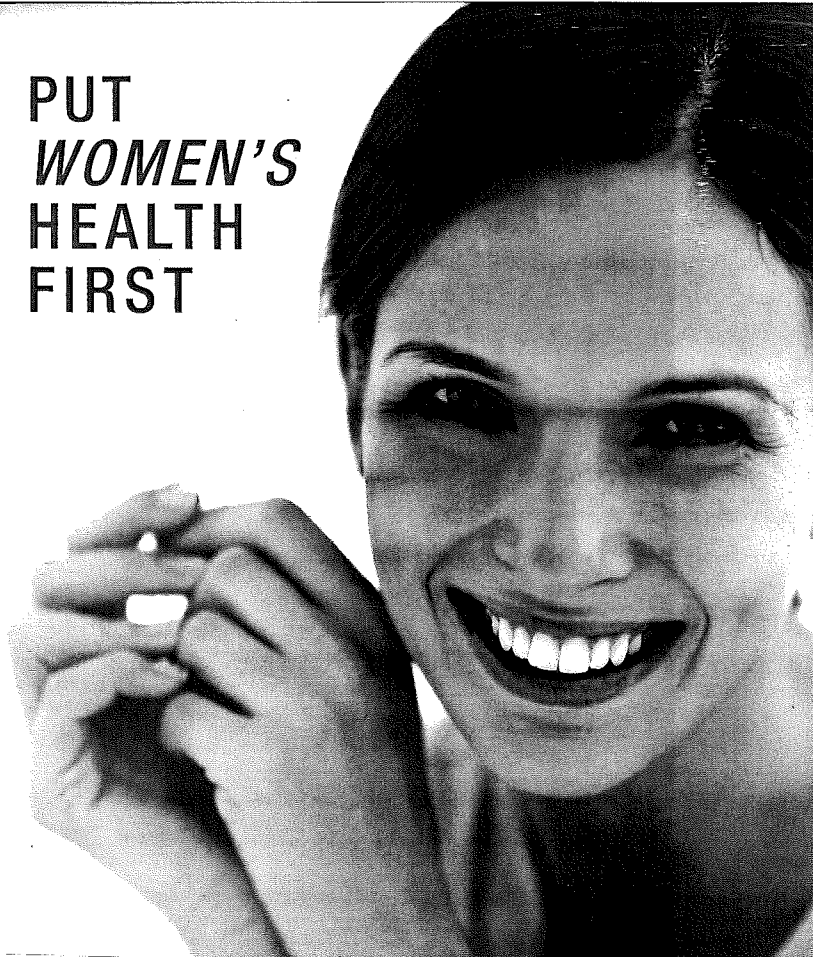
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 **NARAL**
Pro-Choice North Carolina Foundation

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

Planned Parenthood Action Fund of North Carolina

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Name Kyle Shields

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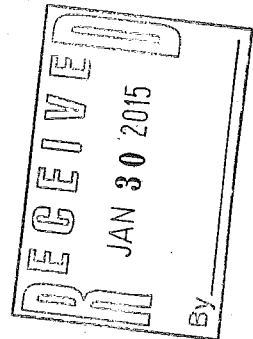
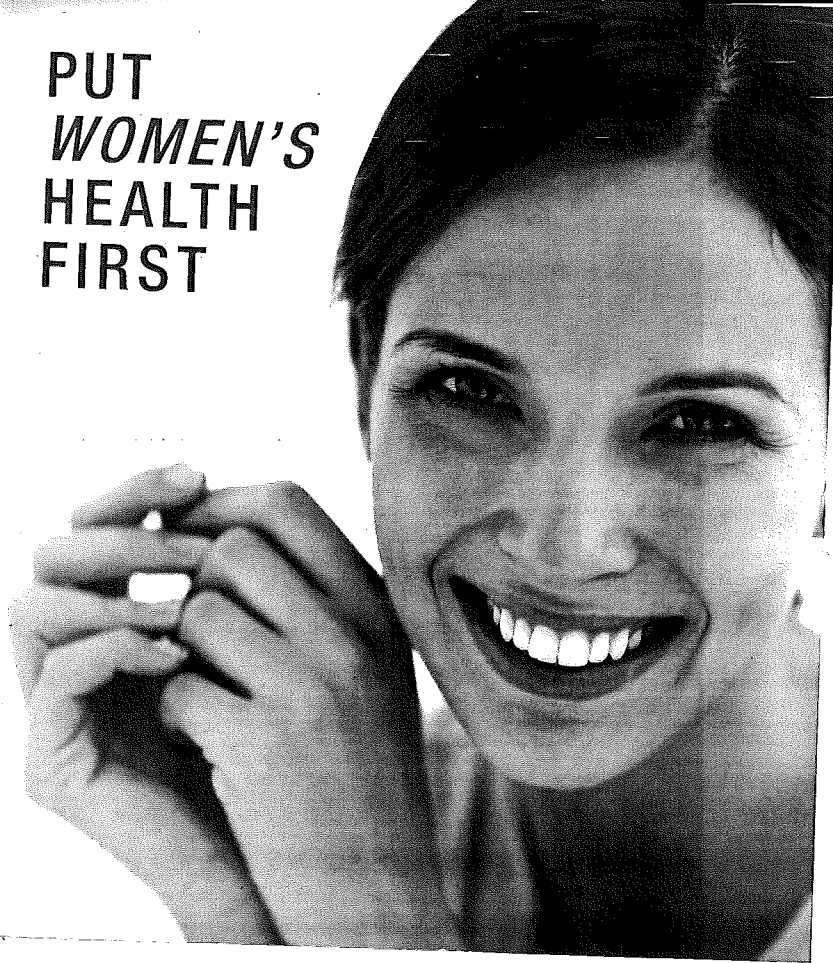
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Name Daniel Shuman
E-mail address Daniel.Shuman@ncdhhs.gov
ZIP Code 27753

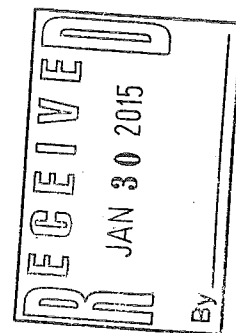
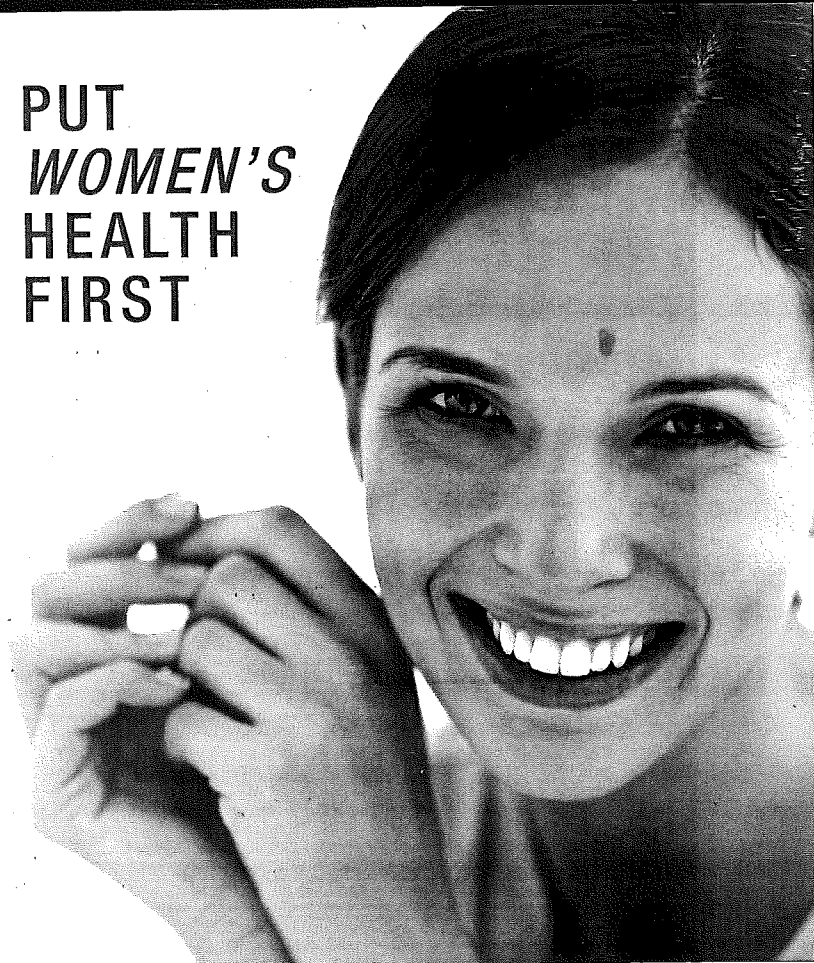
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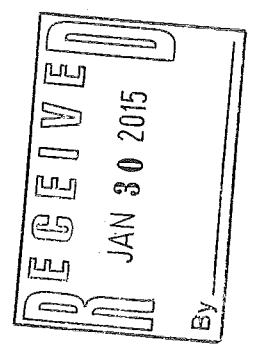
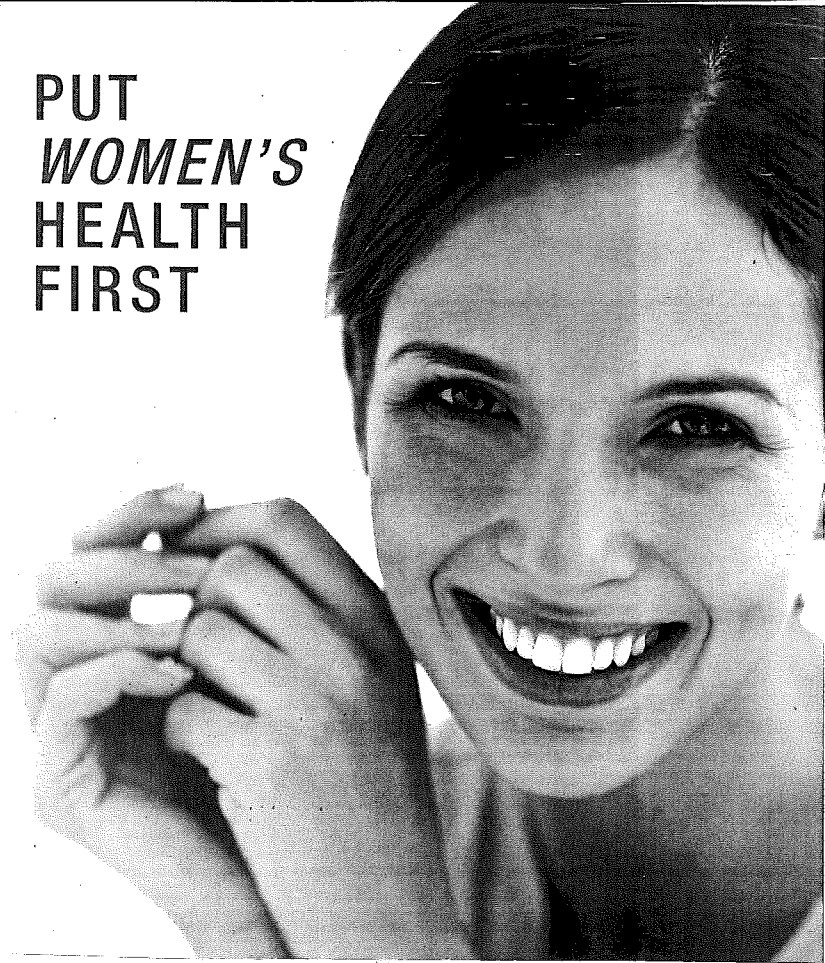
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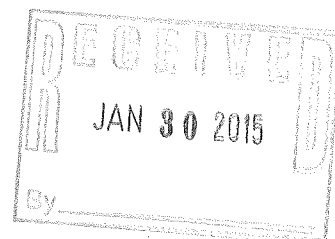
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FIRST NAME:

LAST NAME:

Danielle

Shurman

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dshurman@gmail.com

27609

Optional Comment field:

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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.

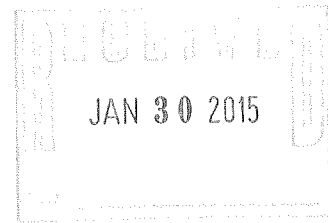
Respectfully submitted,



Nadine Pfeiffer,
Rule-making Coordinator
January 22, 2015



Planned Parenthood Health Systems
Action Fund, Inc.



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

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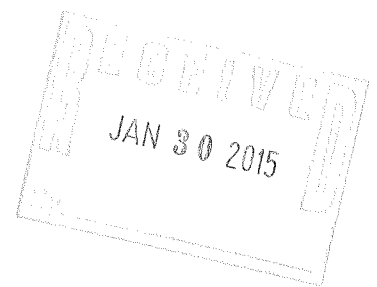
| NAME | EMAIL | ZIP |
|------------------|----------------------------|-------|
| Maryh Barber | BerkeM12 | 27858 |
| Cheyenne Francis | francischi3@students | 27868 |
| Dorrie Green | | 27834 |
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Yes, I would like to receive updates from organizations supporting this comment.

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



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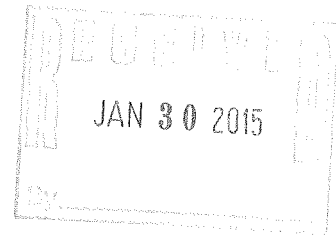
| NAME | EMAIL | ZIP |
|-------------------|---|-------|
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| Corey Frost | c.frost86@gmail.com | 27516 |
| Anne Keyworth | amkeyworth@gmail.com | 27606 |
| Molly Matthews | mollymatthews@gmail.com | 27617 |

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, NC NOW, NCWV, NC Women Matters



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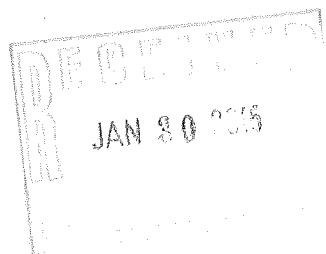
| NAME | EMAIL | ZIP |
|--------------------|---------------------------|-------|
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| DIANA BYRNE | ' | 27603 |
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| Allison Soled | allison.e.rose@gmail.com | 27609 |
| Maddie Majerus | Majerusmaddie@ppstate | 28607 |
| Anna Lobastova | lobastovanna@gmail | 28607 |

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, No Now, No Ever, NC Women Matter



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FIRST NAME:

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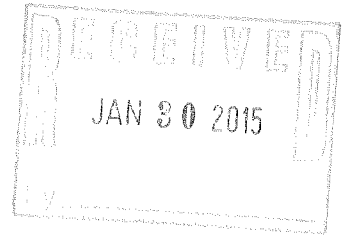
Optional Comment field:

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FIRST NAME:

Jacquelyn

LAST NAME:

Simms

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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

TAKE ACTION!

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Name Claire Simons
E-mail address csimons@unca.edu
ZIP Code 27410

Additional Comments:

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

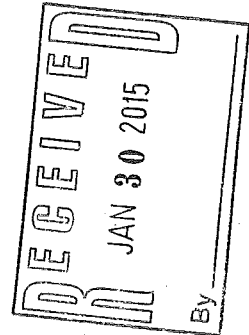
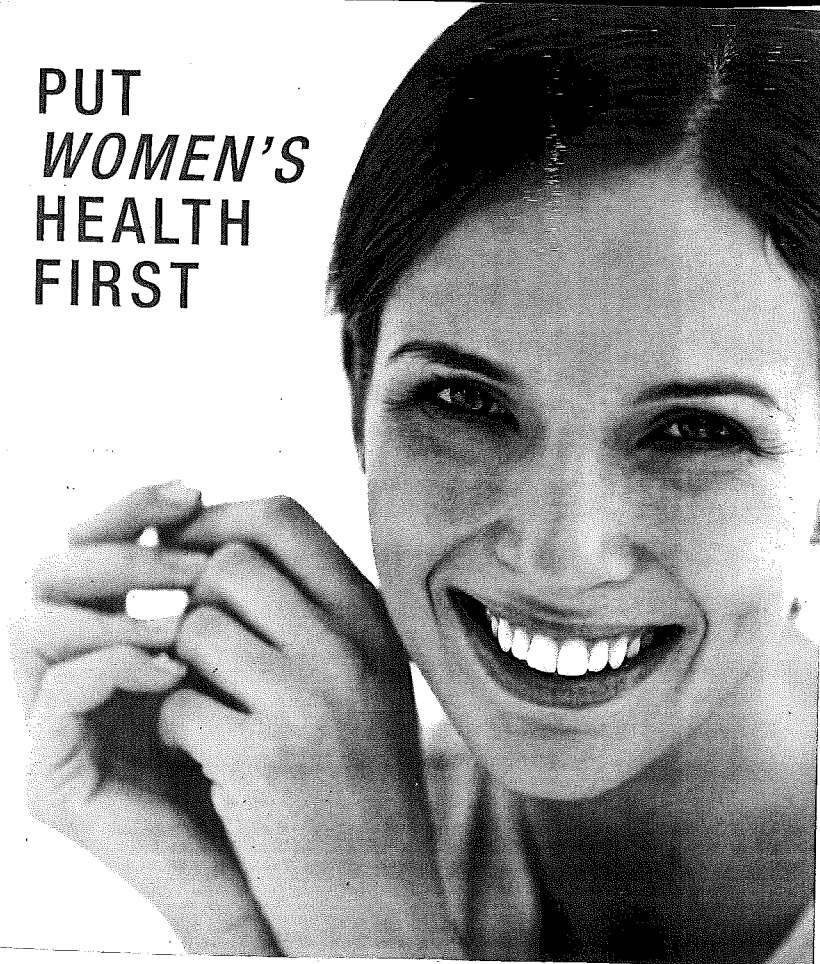


NARAL
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

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

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Name Sandra Simpson

E-mail address _____

ZIP Code 27540

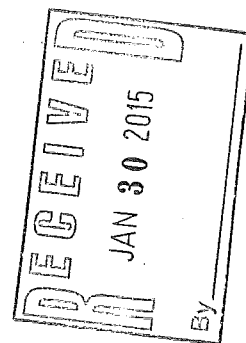
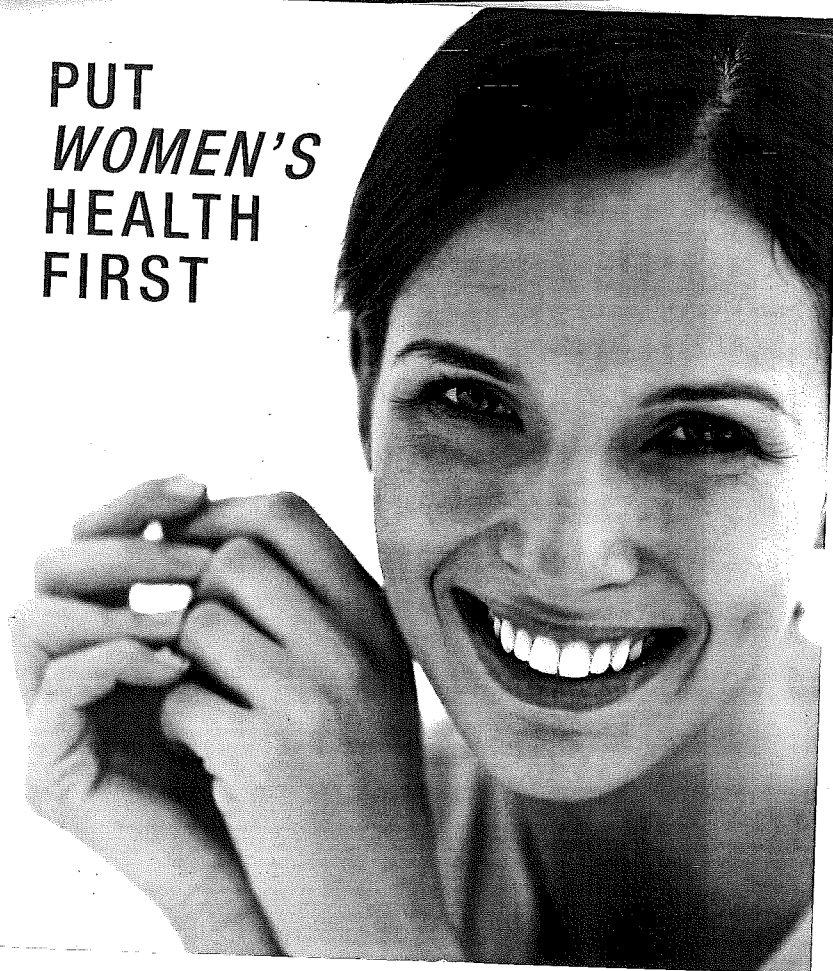
Additional Comments:

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



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

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Name Ashley Simpson

E-mail address _____

ZIP Code 20792

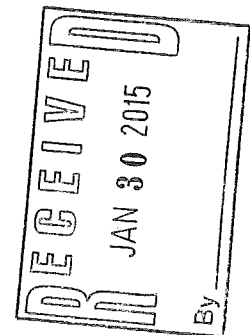
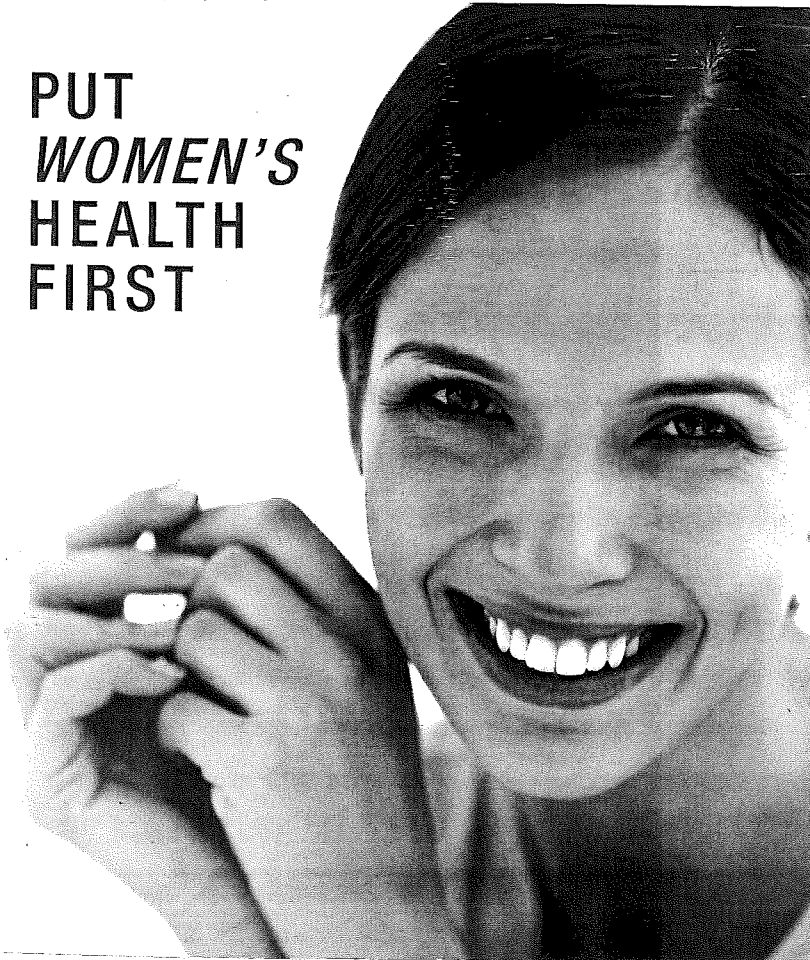
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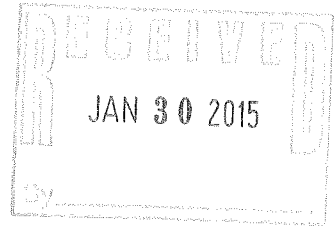
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FIRST NAME:

Anasa

LAST NAME:

Sinegal

EMAIL:

assinegal@aol.com

ZIP:

27517

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 ANN M SINK

E-mail address _____

ZIP Code 27707

Additional Comments:

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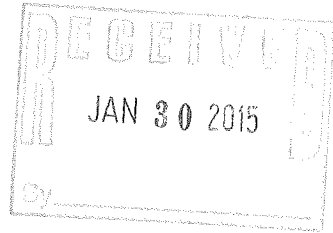
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FIRST NAME:

Brittany

LAST NAME:

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27360

Optional Comment field:

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Name Autumn Sky

E-mail address SkyAutumn0@gmail.com

ZIP Code 2831

Additional Comments:

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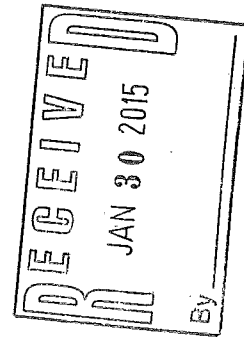
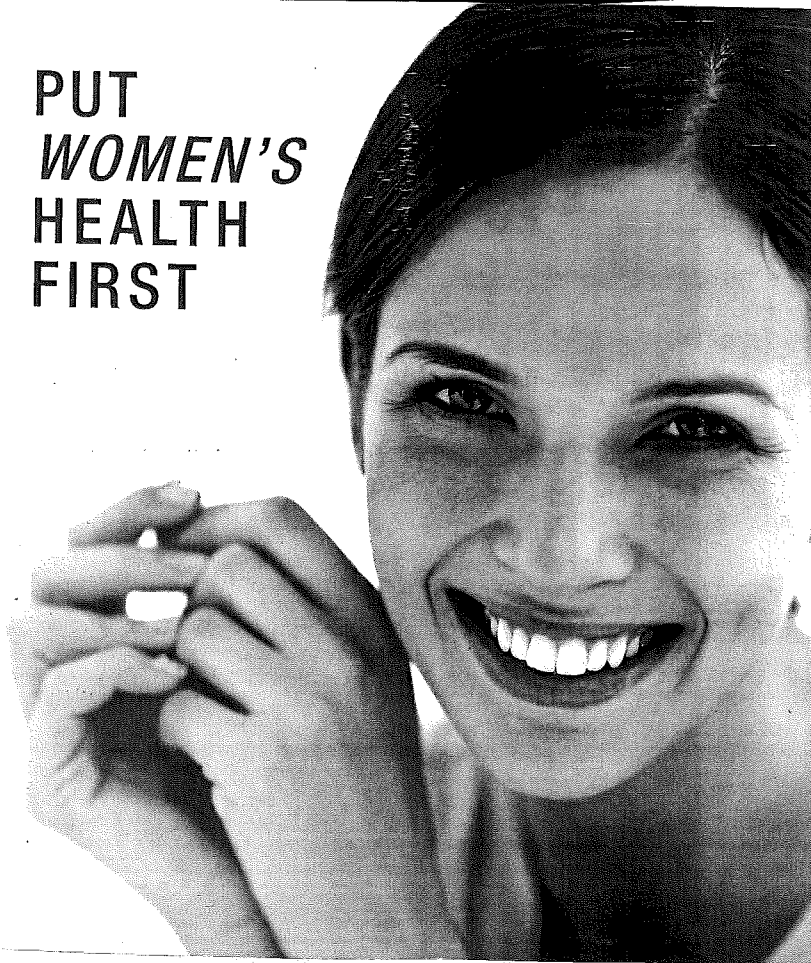


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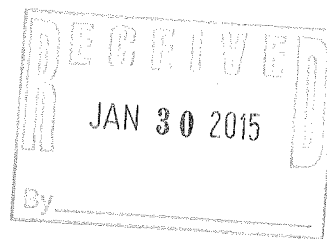


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FIRST NAME:

Megan

LAST NAME:

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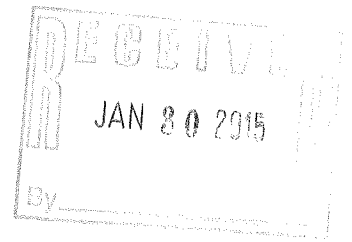
ZIP:

27616

Optional Comment field:

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FIRST NAME:

LAST NAME:

Christina Slavinsky

EMAIL:

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Christy.Slavinsky@gmail.com 27713

Optional Comment field:

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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

TAKE ACTION!

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Name Jennifer Smith

E-mail address _____

ZIP Code 27217

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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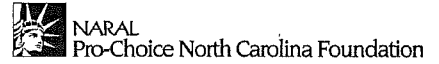
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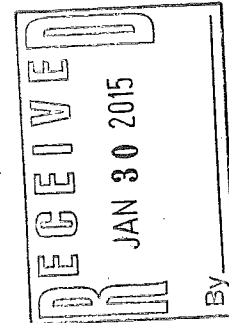
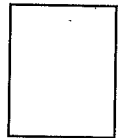
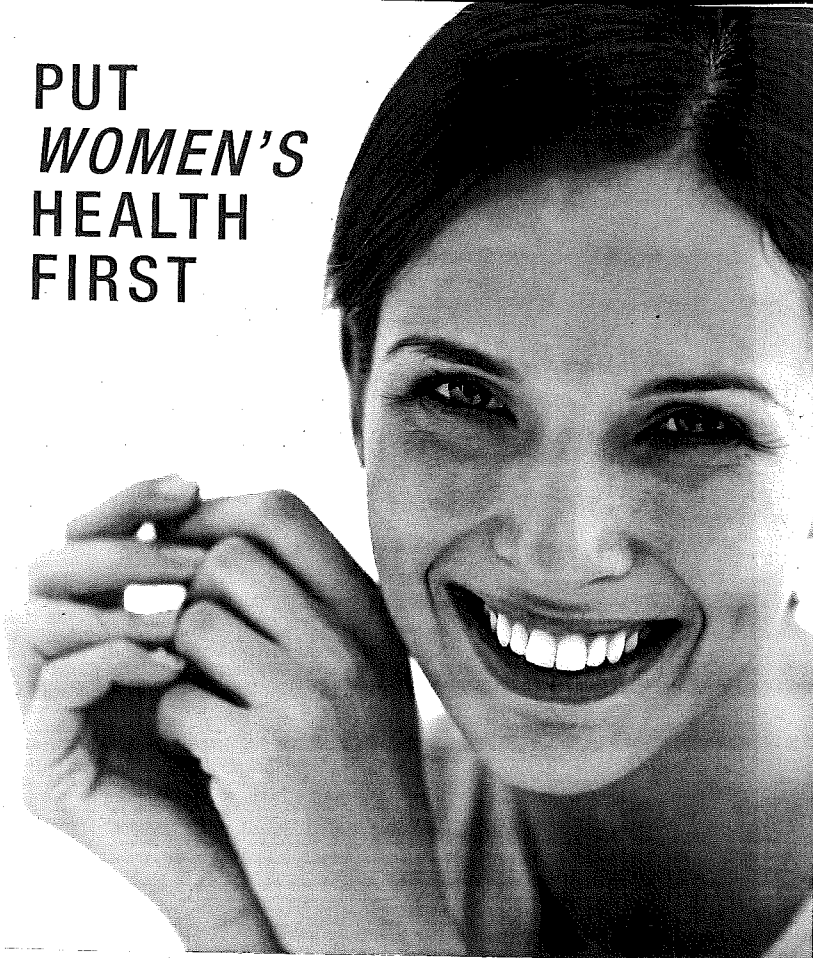
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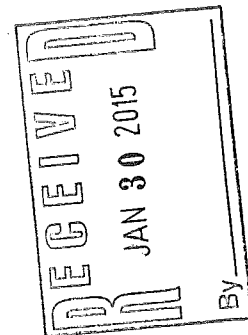
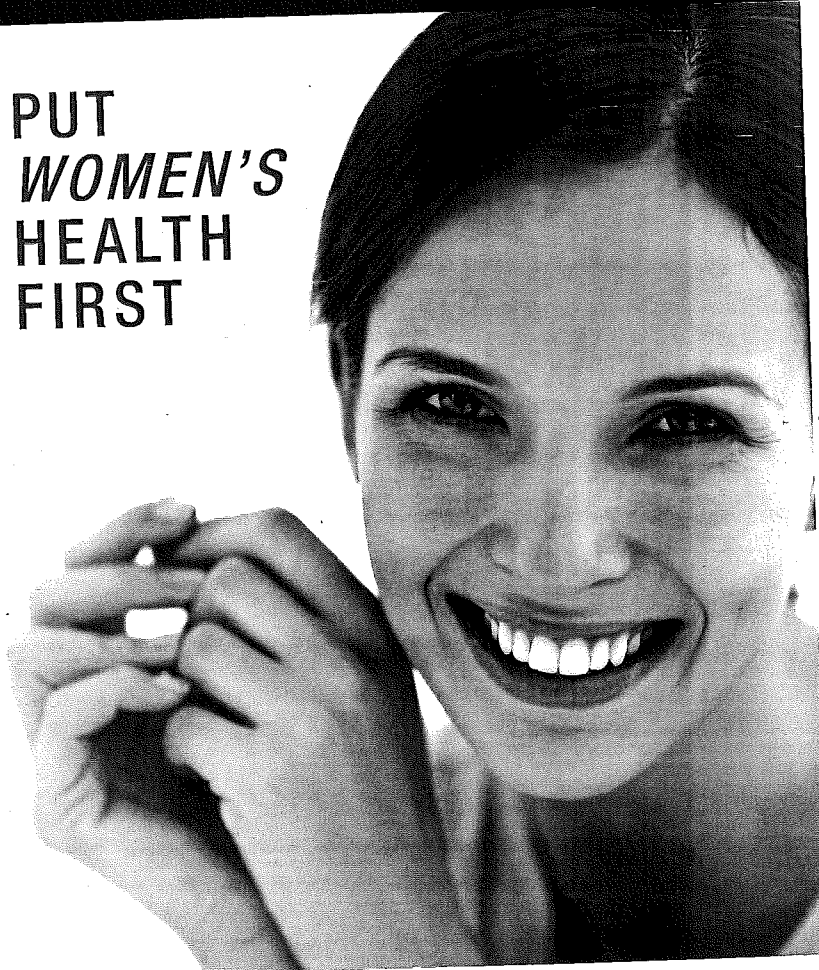
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Name Jane Smith
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ZIP Code 27514

Additional Comments:

My body!

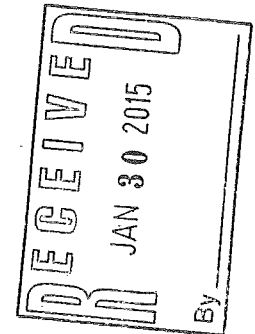
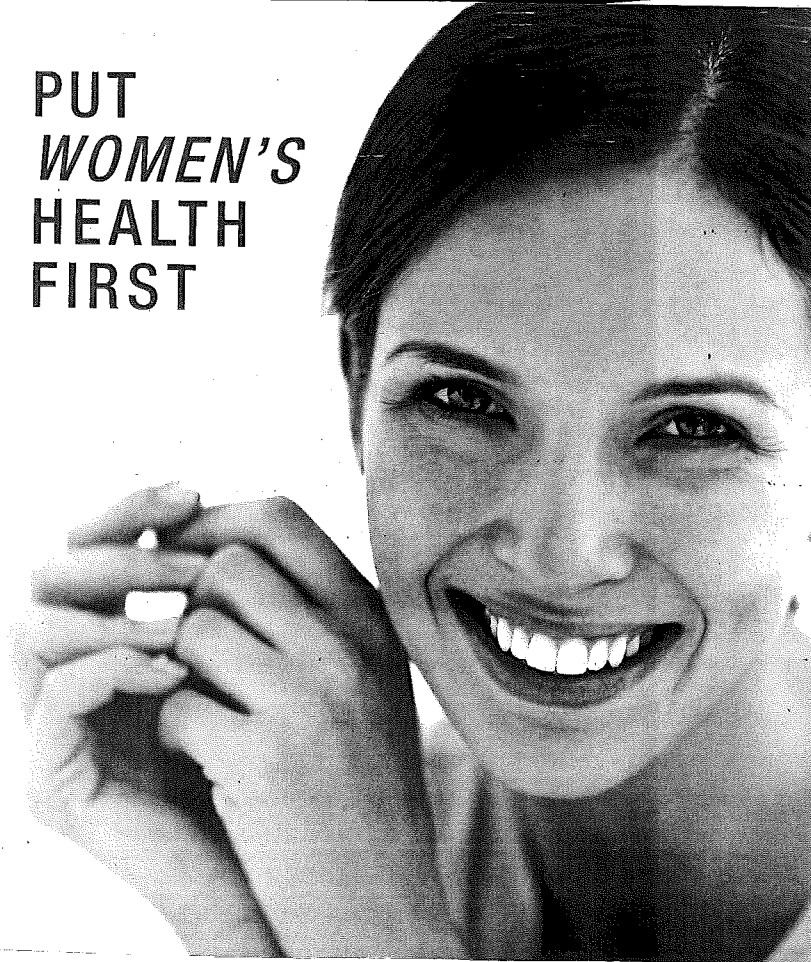
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 **Planned Parenthood**
Act. No matter what.

Planned Parenthood Action Fund of North Carolina

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Name Brandon Smith

E-mail address bsmith-89@hotmail.com

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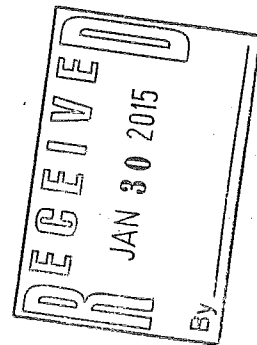
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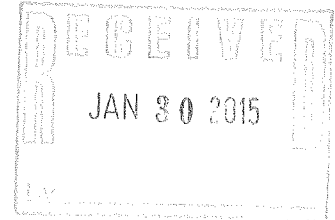
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Planned Parenthood Health Systems
Action Fund, Inc.



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FIRST NAME:

Blanche Yvonne

LAST NAME:

Smith

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28801

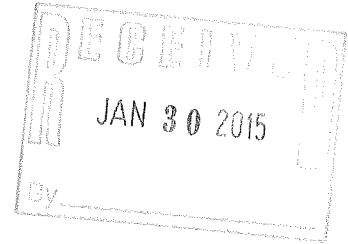
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FIRST NAME:

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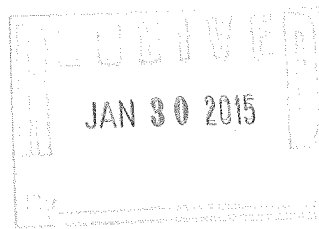
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FIRST NAME:

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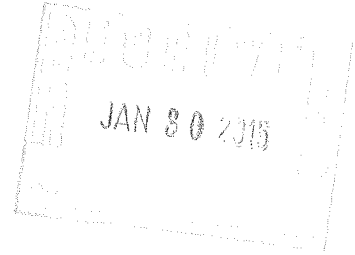
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FIRST NAME:

Christina

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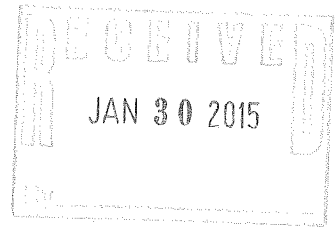
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FIRST NAME:

LAST NAME:

Rachel

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haislipsmith@gmail.com

28804

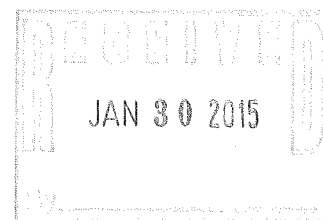
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FIRST NAME:

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Kate

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Optional Comment field:

.com

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Name Kasie Smith-Woodman

E-mail address _____

ZIP Code 28804

Additional Comments:

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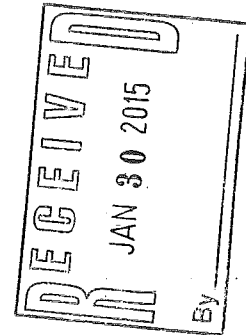
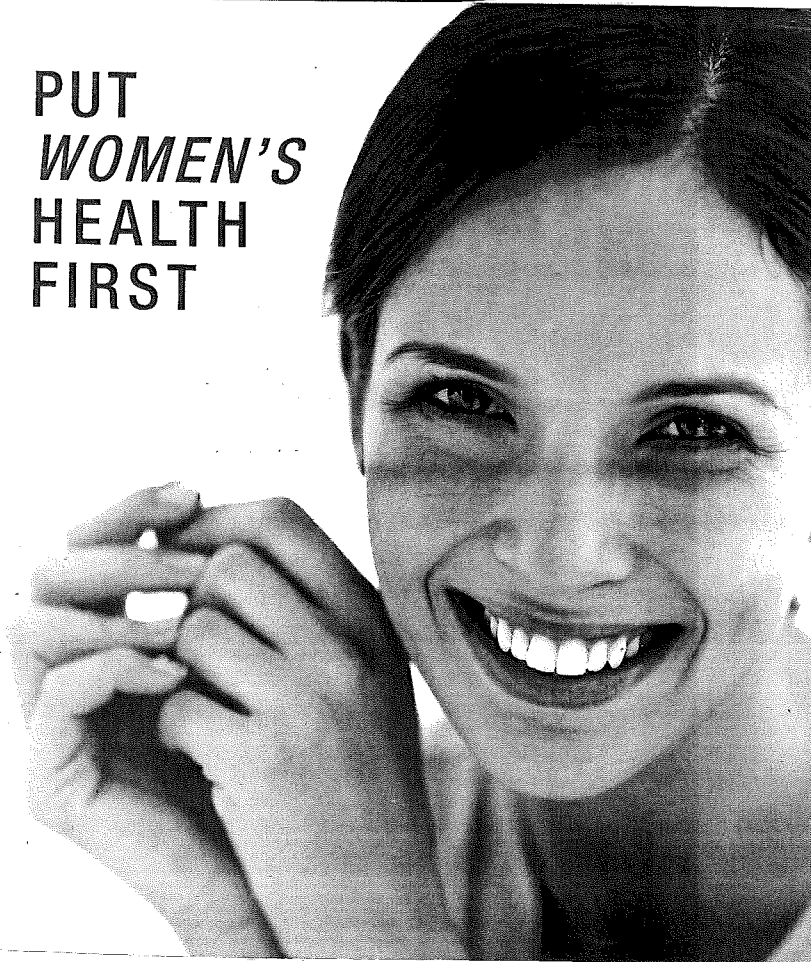


NARAL
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Name Scott Sneed
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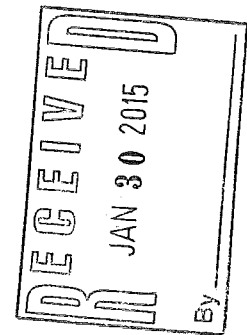
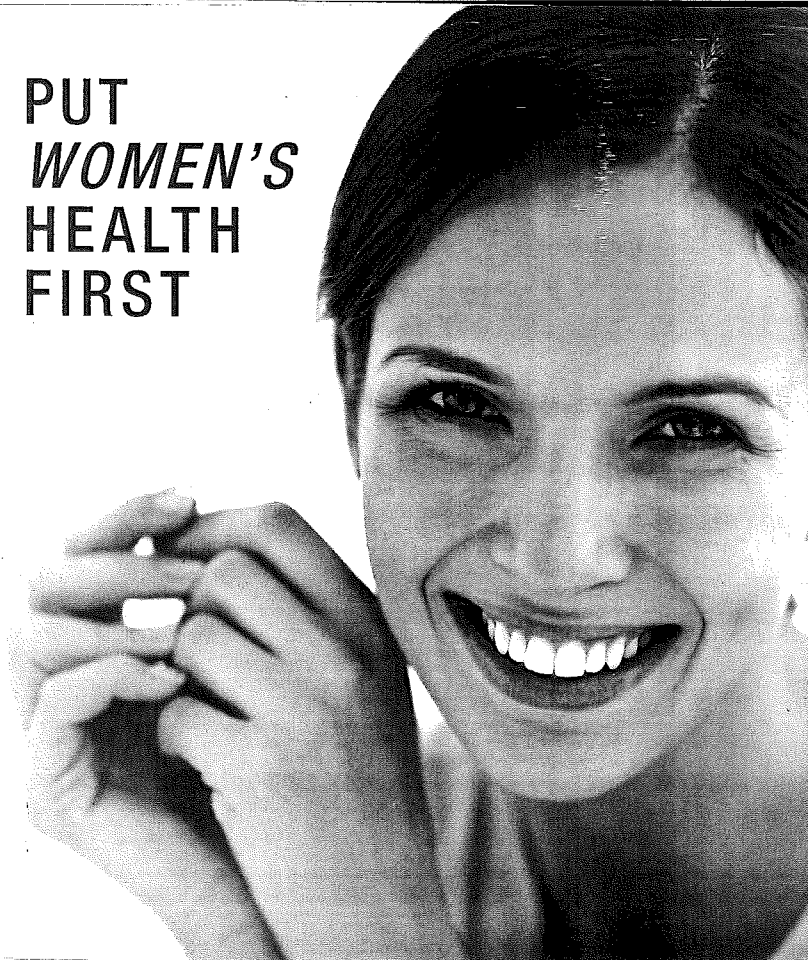
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Name Ben Solomon
E-mail address valuedcultures@gmail.com
ZIP Code 28804

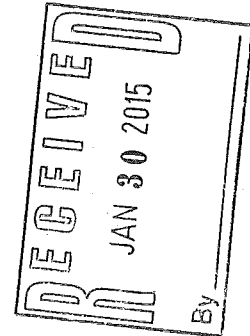
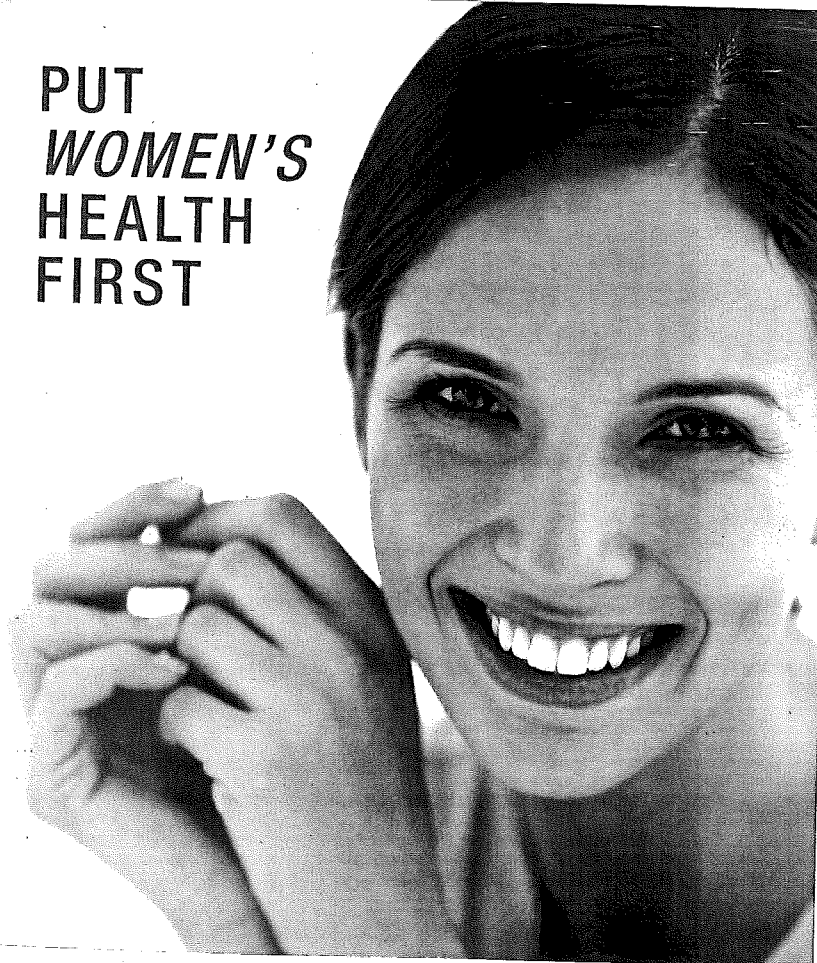
Additional Comments:

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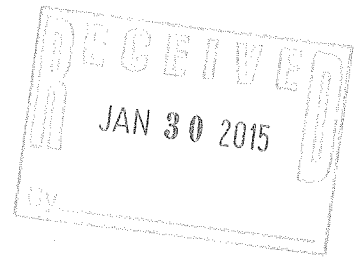
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Nadine Pfeiffer
Division of Health Service Regulation
2701 Mail Service Center
Raleigh, NC 27699-2701



Planned Parenthood Health Systems
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FIRST NAME:

JAMIE

LAST NAME:

Solun

EMAIL:

ZIP:

27510

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 Jen Sante
E-mail address jennifer.sante@gmail.com
ZIP Code 27609

Additional Comments:
We need:
Safe, cheap and accessible

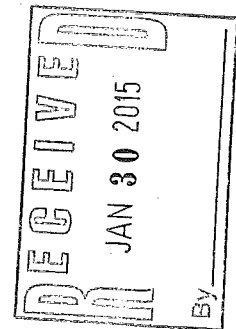
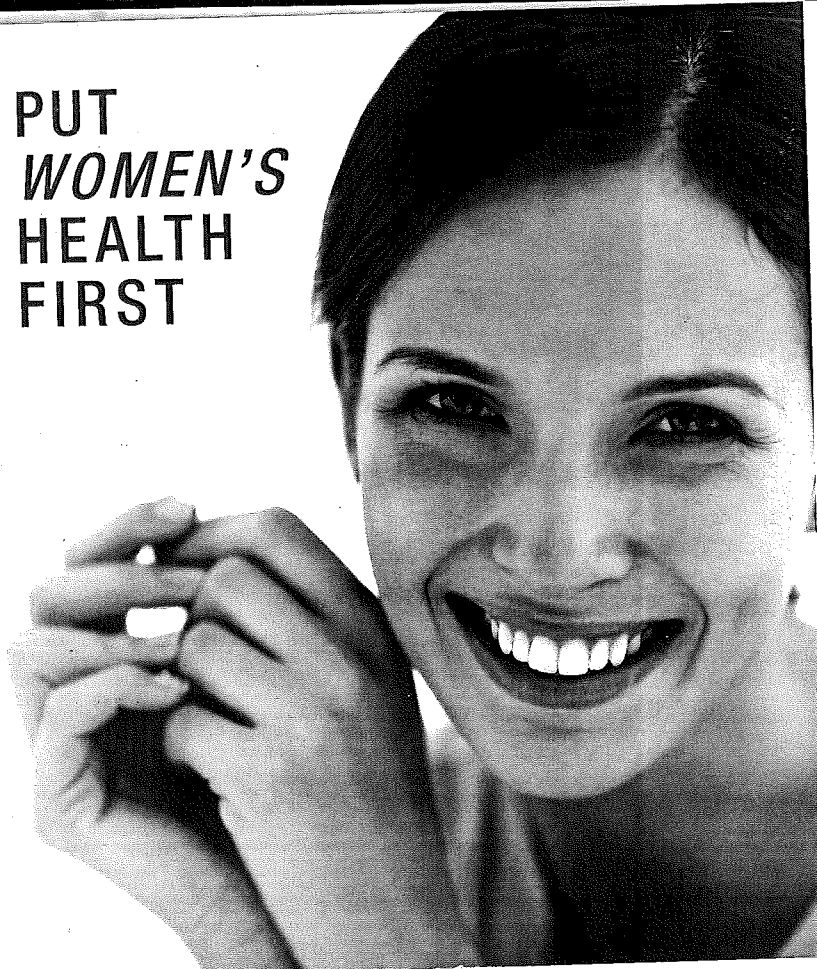
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Name Joseph Sorce

E-mail address ccaemedia@gmail

ZIP Code 28348

Additional Comments:

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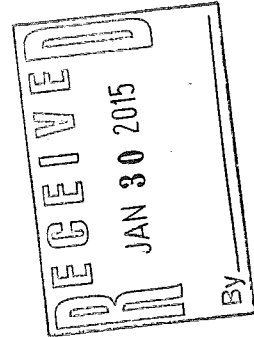
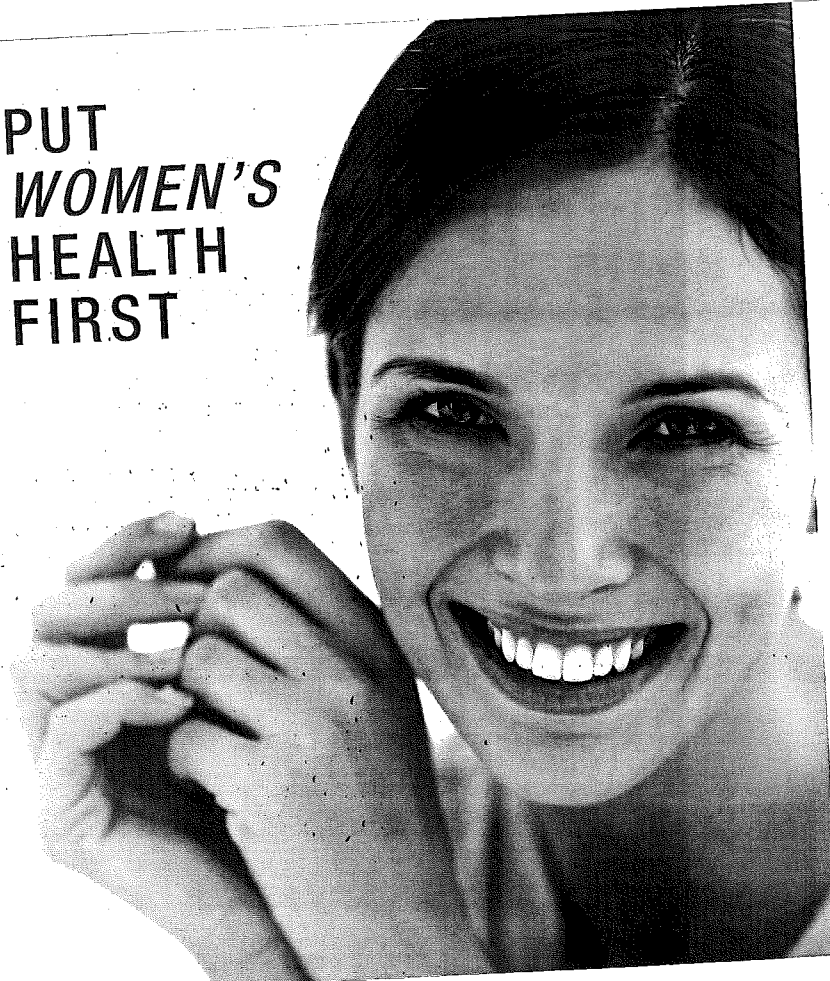


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Name Alejandro Soto
E-mail address alejandro12soto7@hotmail.com
ZIP Code 28823

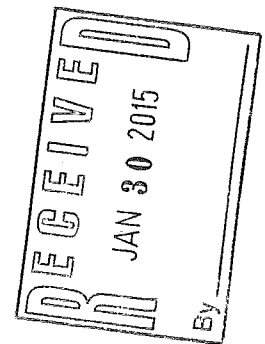
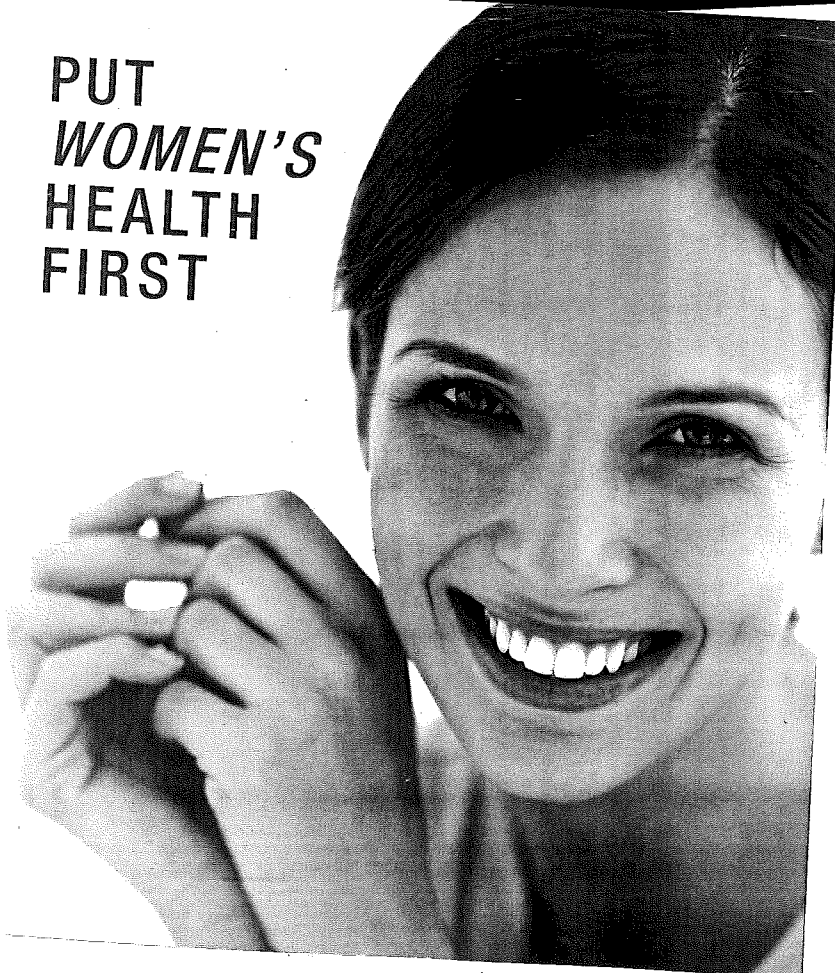
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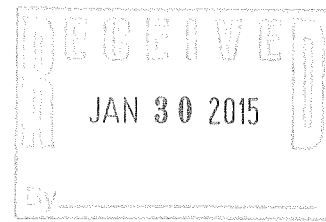


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FIRST NAME:

Allen

LAST NAME:

Spatt

EMAIL:

ZIP:

27510

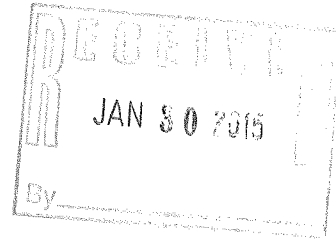
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FIRST NAME:

LAST NAME:

Allen

Spalt

EMAIL:

ZIP:

a.spalt@mindspring.com 27510

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Name Allen Spalt

E-mail address aspalt@att.net

ZIP Code 27510

Additional Comments:

*Women's health is family health
for wives, mothers, sisters, daughters.
It must be comprehensive, safe,
and based on medical evidence
and choice not ideology. I urge
you to keep these goals as the
top priorities in finalizing the rules.*
Allen Spalt

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

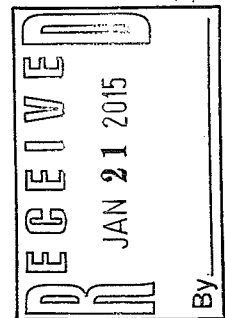
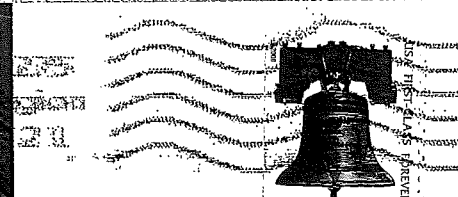


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Name W Speller
E-mail address WSpeller@CGmail.com
ZIP Code 27804

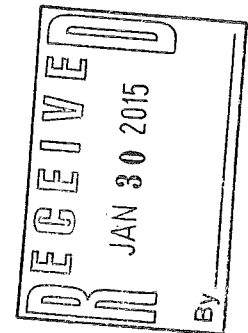
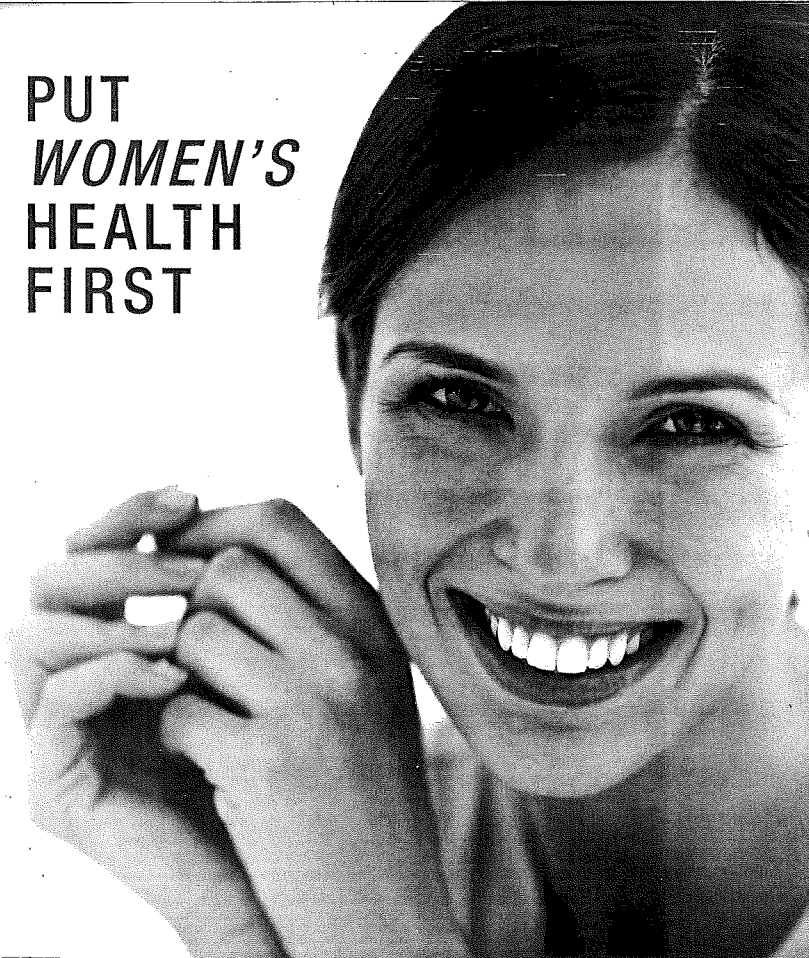
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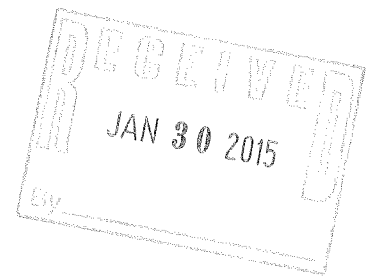
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FIRST NAME:

Eric

LAST NAME:

Spengler

EMAIL:

eric.s.spengler@gmail.com

ZIP:

28203

Optional Comment field:

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Name BELLA SPINIZ
E-mail address RSPINIZ@unc.edu
ZIP Code 27601

Additional Comments:

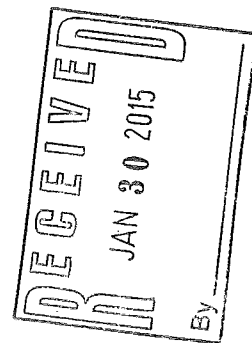
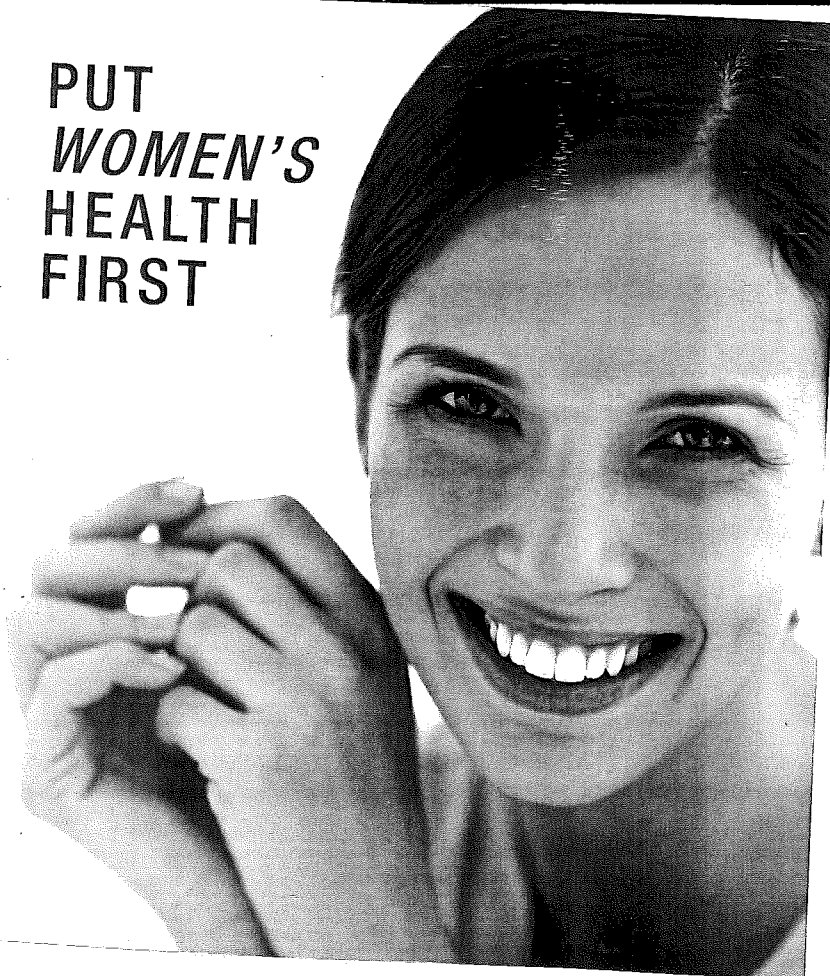
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Name Chloe Spooner

E-mail address chloenspooner@gmail.com

ZIP Code 27608

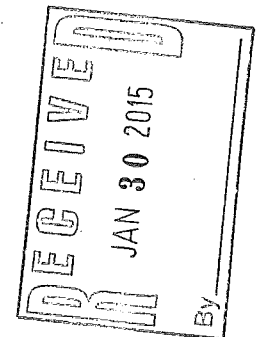
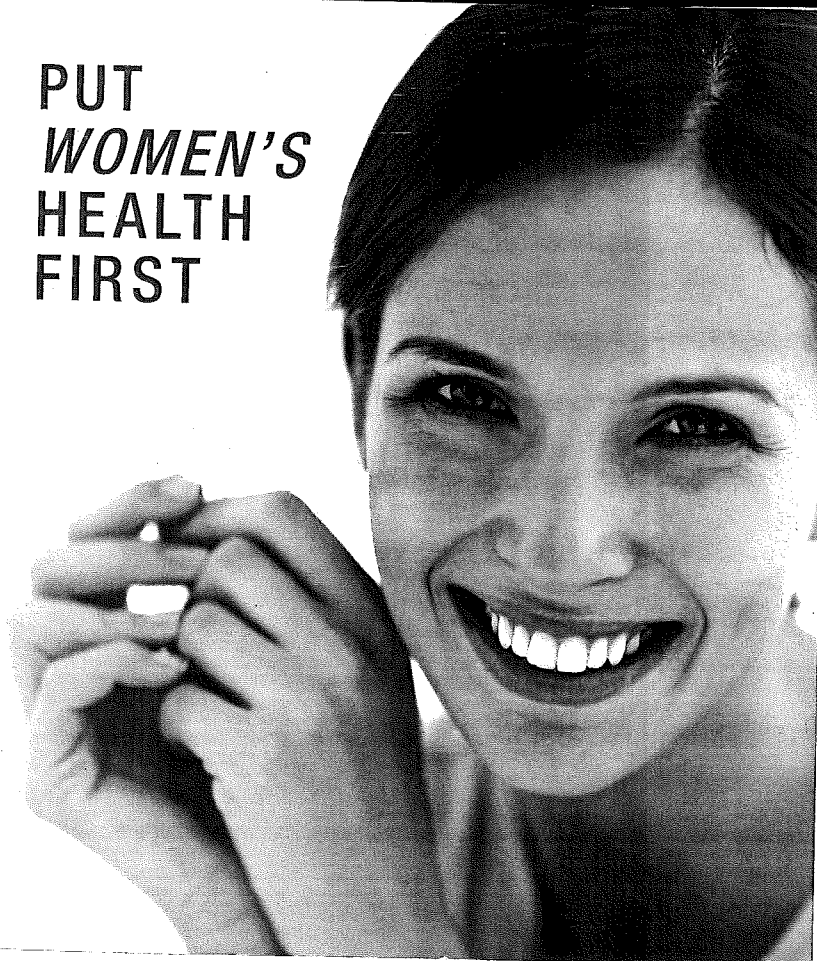
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Name Dominique Spruill
E-mail address spruill0506@gmail.com
ZIP Code 27406

Additional Comments:

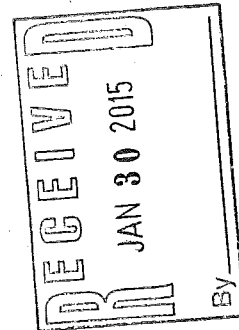
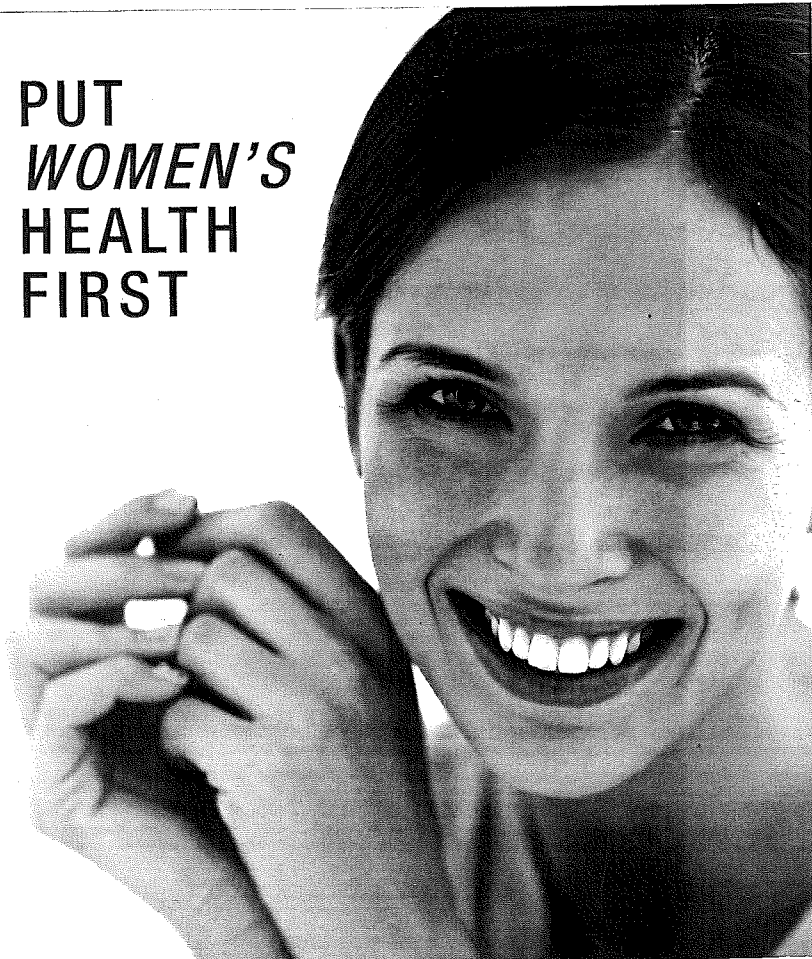
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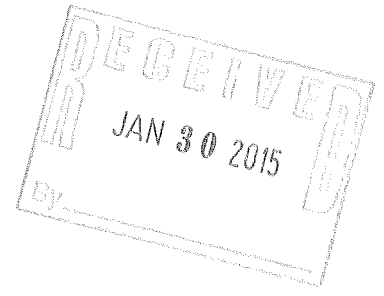
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FIRST NAME:

Steven

LAST NAME:

Sreeb

EMAIL:

sreebo@gmail.com

ZIP:

28801

Optional Comment field:

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Name Grace Probers
E-mail address durhamgrace@gmail.com
ZIP Code 28804

Additional Comments:

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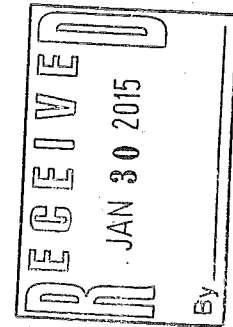
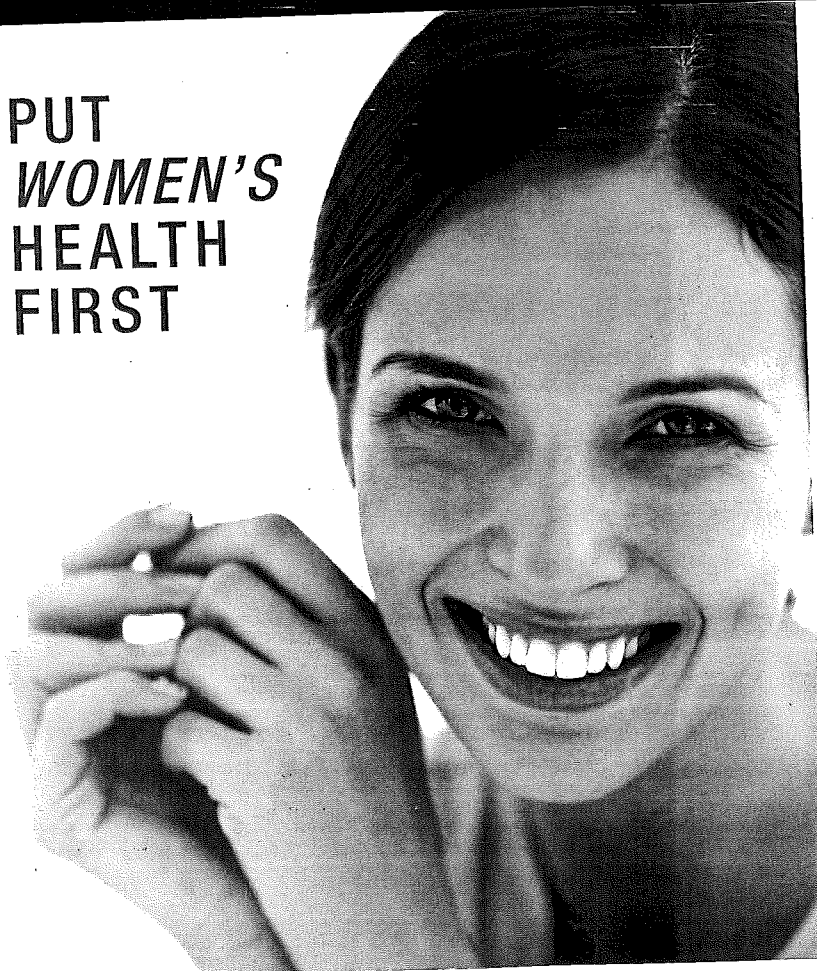


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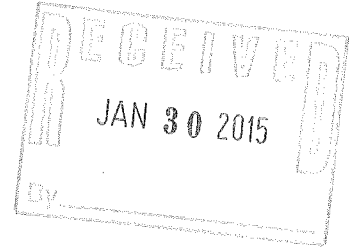
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FIRST NAME:

LAST NAME:

Alexandria

Stacy

EMAIL:

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agstacy@email.meredith.edu

27609

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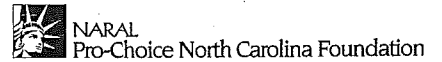
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Name Blake Stafford
E-mail address bstafford12@gmail.com
ZIP Code 27713

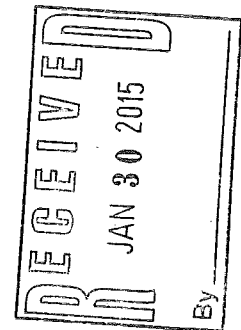
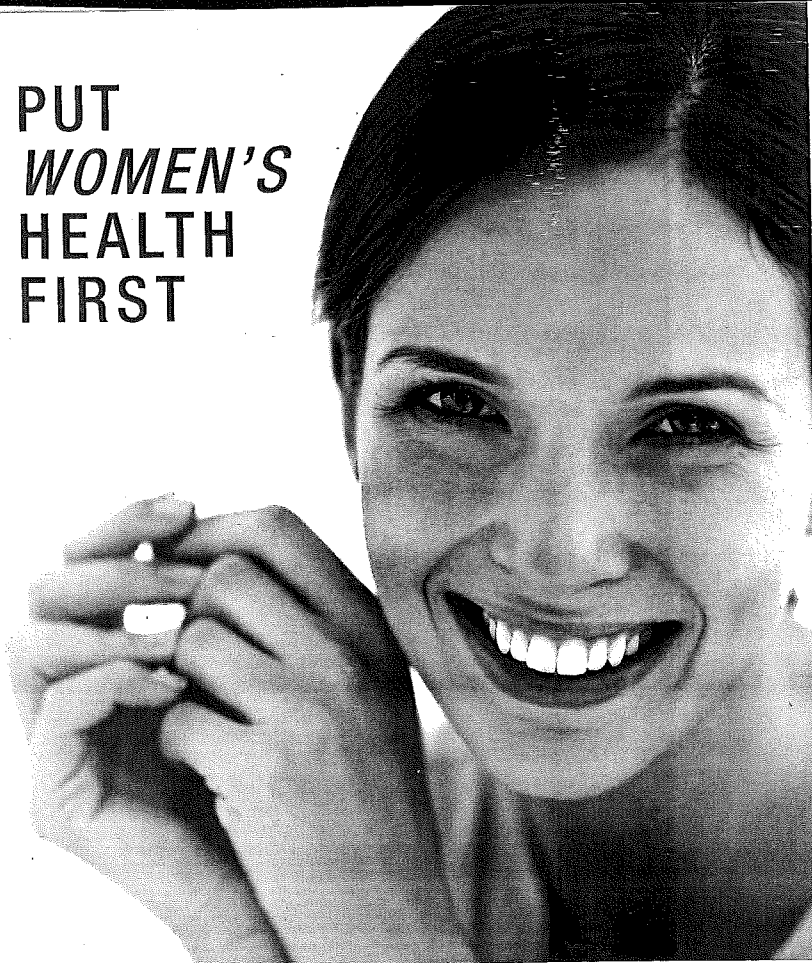
Additional Comments:

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



Planned Parenthood Action Fund of North Carolina

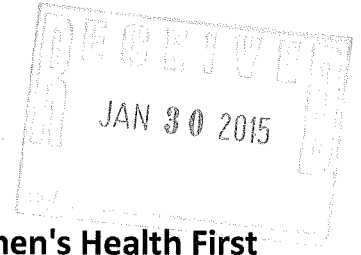
PUT
WOMEN'S
HEALTH
FIRST



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:

Bethany

LAST NAME:

Stafford-Smith

EMAIL:

bstafford@gmail.com

ZIP:

27516

Optional Comment field:

SUPPORT WOMEN'S HEALTH & CONFIDENTIALITY

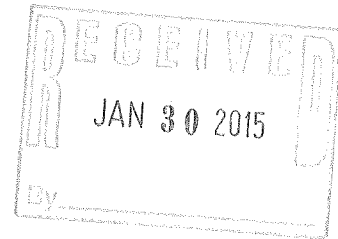
BSS

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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:

Margaret

LAST NAME:

Stamey

EMAIL:

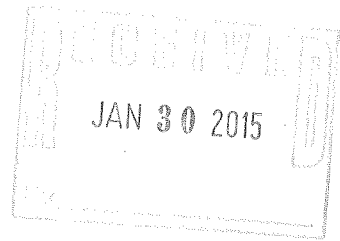
ZIP:

22805

Optional Comment field:

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FIRST NAME:

LAST NAME:

Anna

Stearns

EMAIL:

ZIP:

anna8297@gmail.com

28711

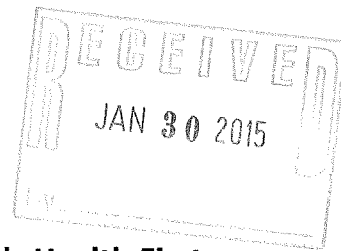
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FIRST NAME:

LAST NAME:

Tracey

Stearns

EMAIL:

ZIP:

designleadgraphixdesign.com

28802

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 Sandra Stein
E-mail address sondragsteine@nc.rr.com
ZIP Code 27705

Additional Comments:

The best way to support women's health & safety is to implement these proposed regulations.
Thank You!

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 Dawn Steinwright
E-mail address ondaalive@gmail
ZIP Code 27603

Additional Comments:

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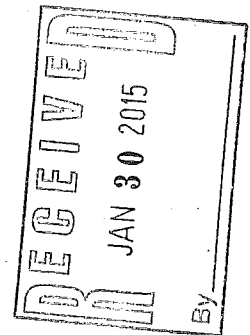
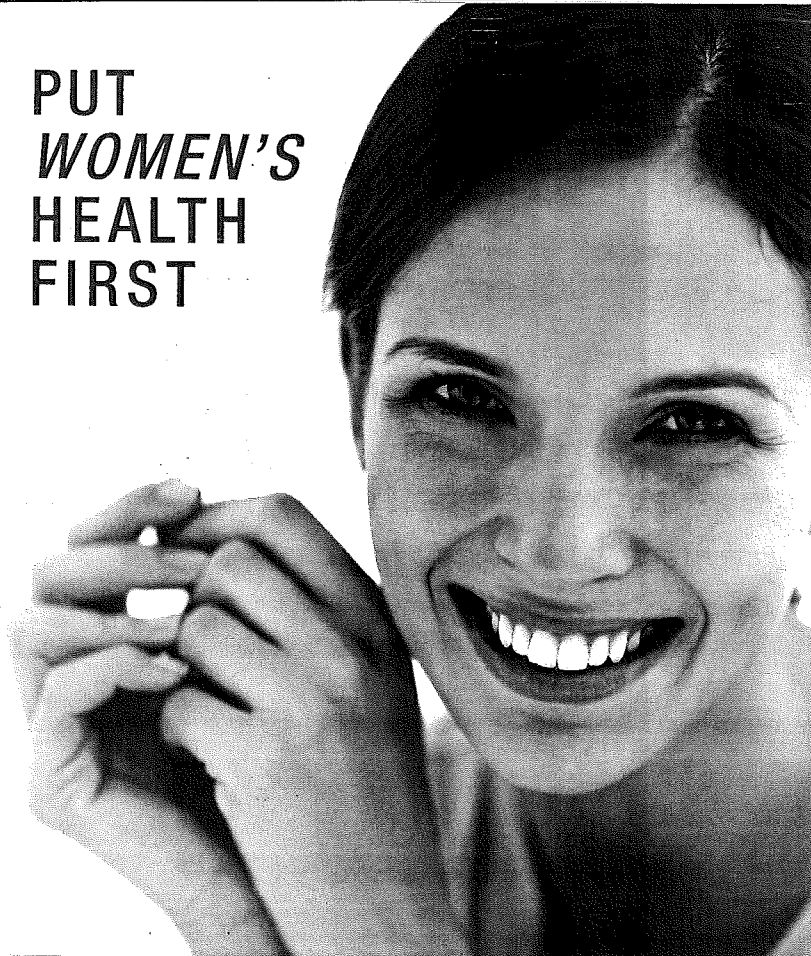


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Name ANN STEMBRIDGE
E-mail address ANNSTEMBRIDGE@earthlink.net
ZIP Code 28787

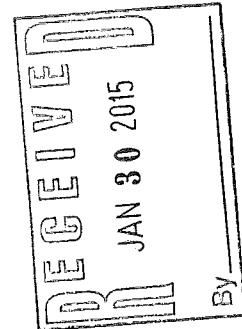
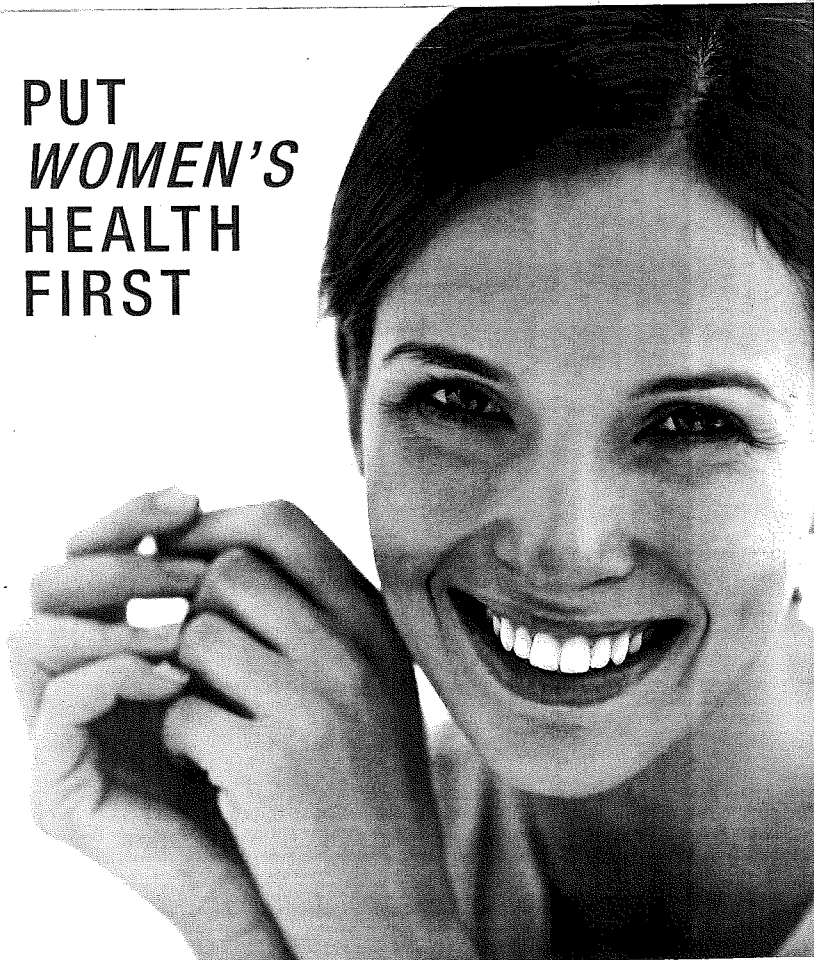
Additional Comments:

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Name Samy Sterling

E-mail address _____

ZIP Code 78801

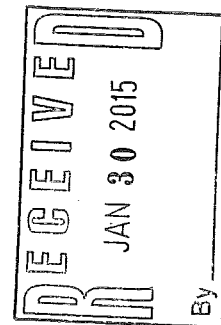
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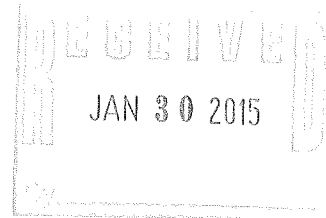
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FIRST NAME:

LAST NAME:

Aaron Stern

EMAIL:

ZIP:

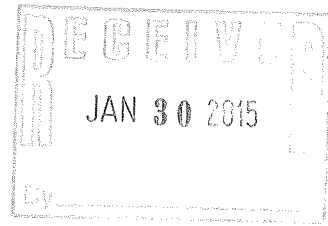
aster1@unca.edu 28804

Optional Comment field:

135

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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:

Phyllis ~~Stiles~~

Stiles

EMAIL:

ZIP:

phdstiles@gmail.com

28801

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 Felix V. Smith

E-mail address Felix.Smith@ymail.com

ZIP Code 28714

Additional Comments:

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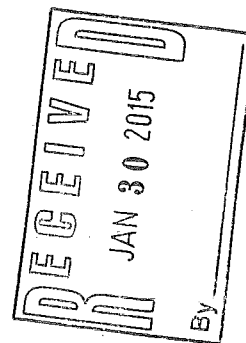
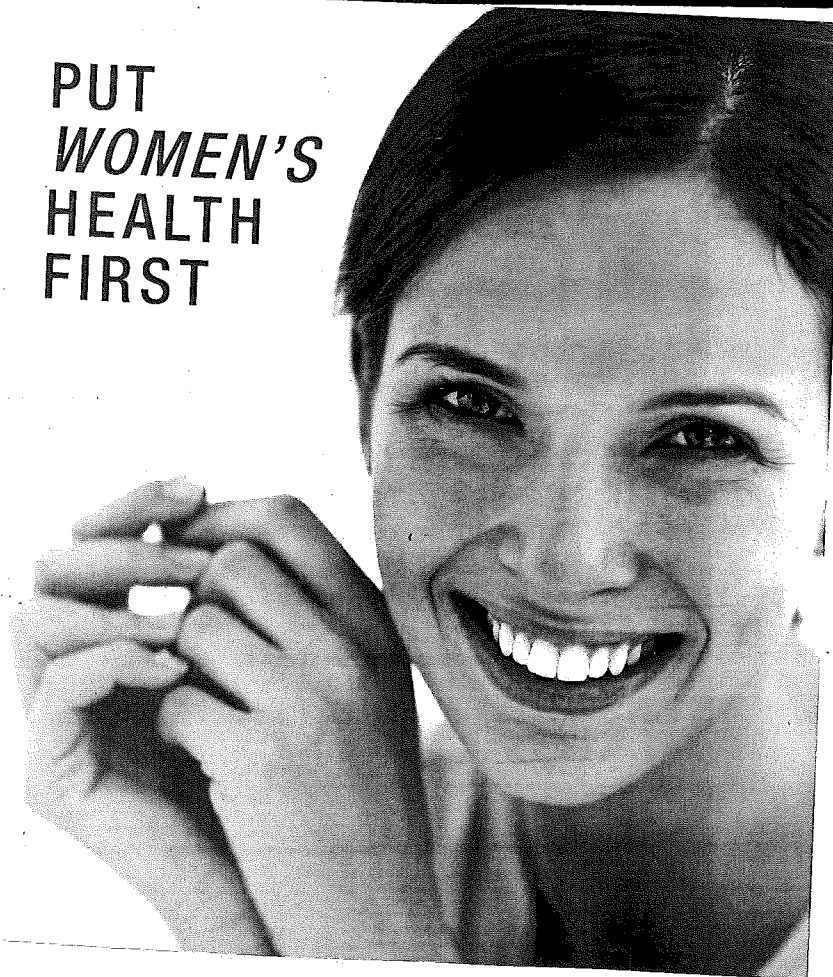


NARAL
Pro-Choice North Carolina Foundation



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Name Nicole Stoppel

E-mail address _____

ZIP Code 20443

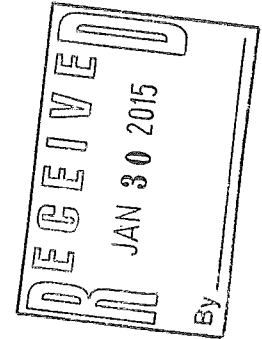
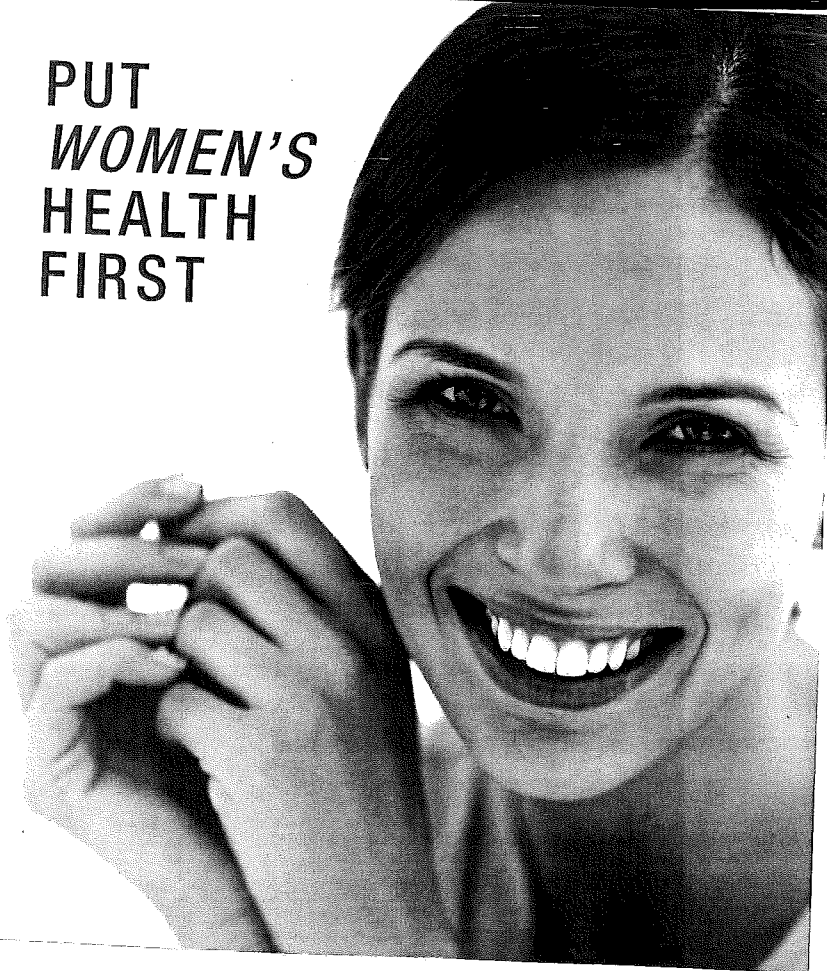
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Name Jeanette Stokes
E-mail address Stokes Net @ aol.com
ZIP Code 27701

Additional Comments:

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Name William Stolley
E-mail address Wls47@hotmail.com
ZIP Code 27613

Additional Comments:

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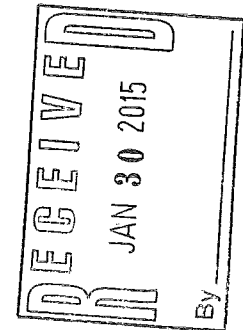
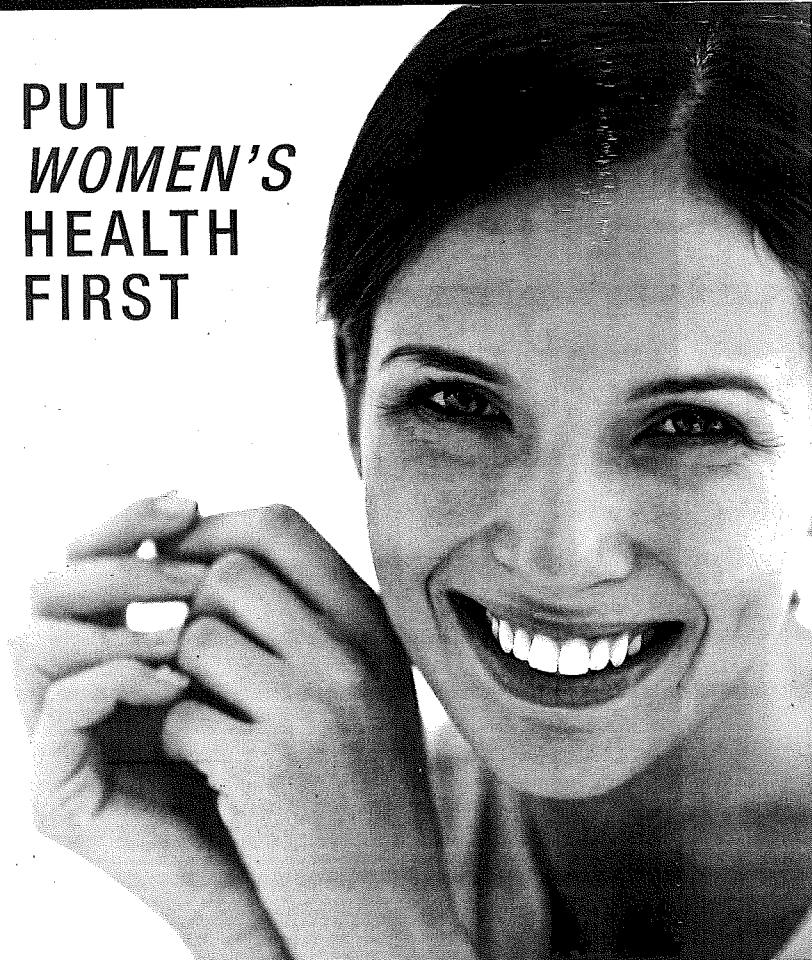


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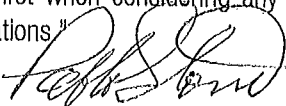


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Name Pablo Stone

E-mail address _____

ZIP Code 28711-0145

Additional Comments:

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Pro-Choice North Carolina Foundation

 **Planned Parenthood***
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Name TAYLOR STONE
E-mail address TSTONE@unca.edu
ZIP Code 27526

Additional Comments:

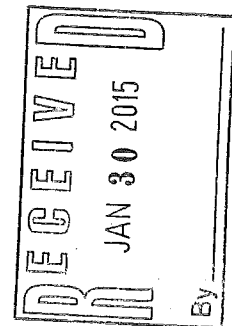
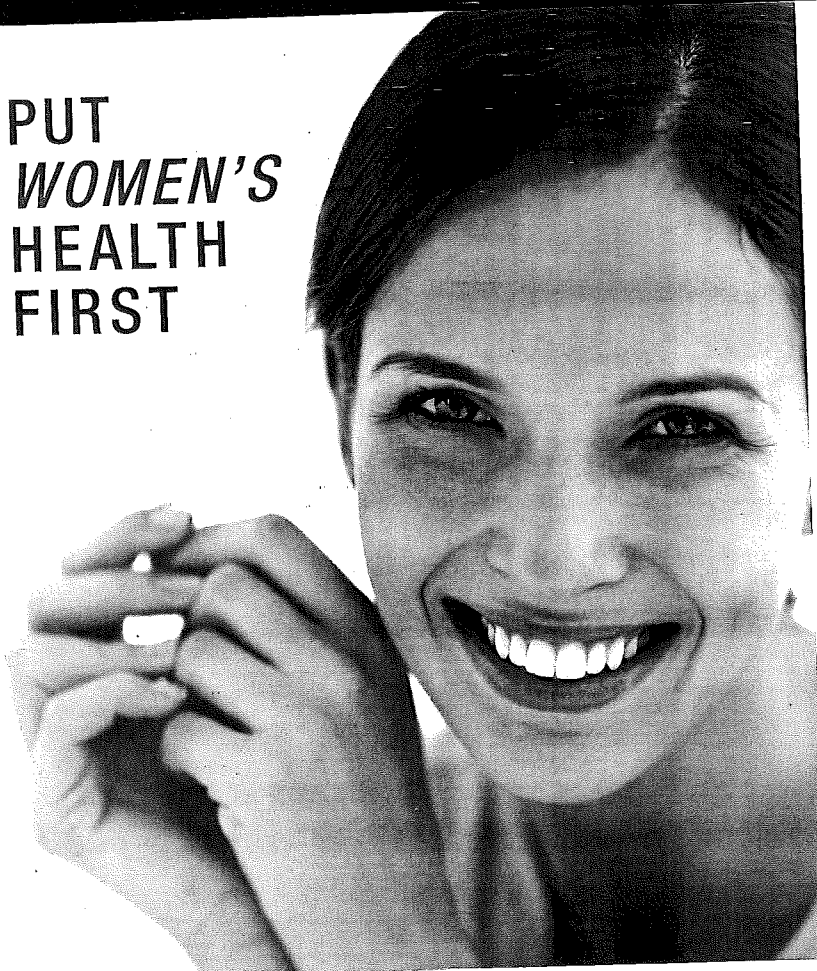
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Name Rebecca Stowe

E-mail address rstowe@uncw.edu

ZIP Code 28804

Additional Comments:

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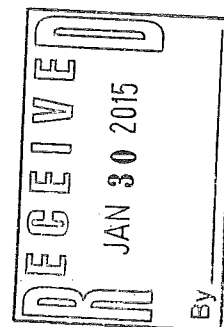
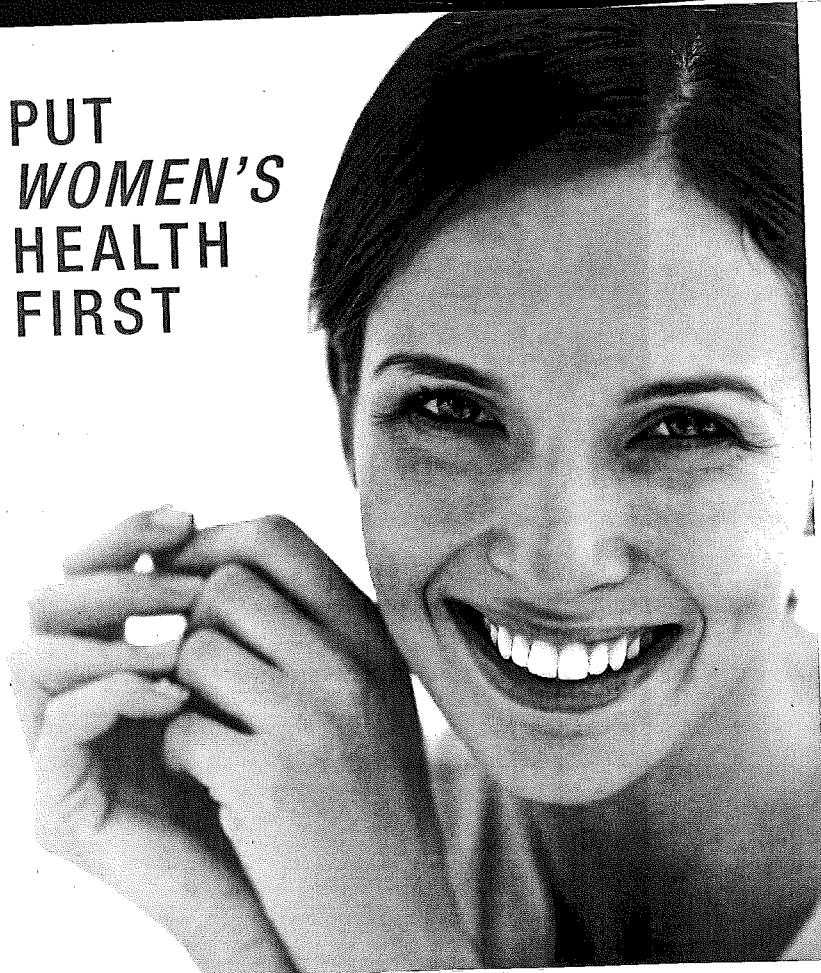


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Name Damon Streater
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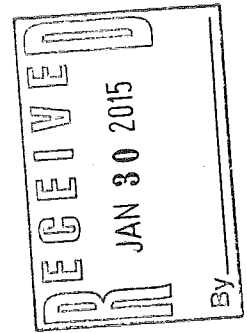
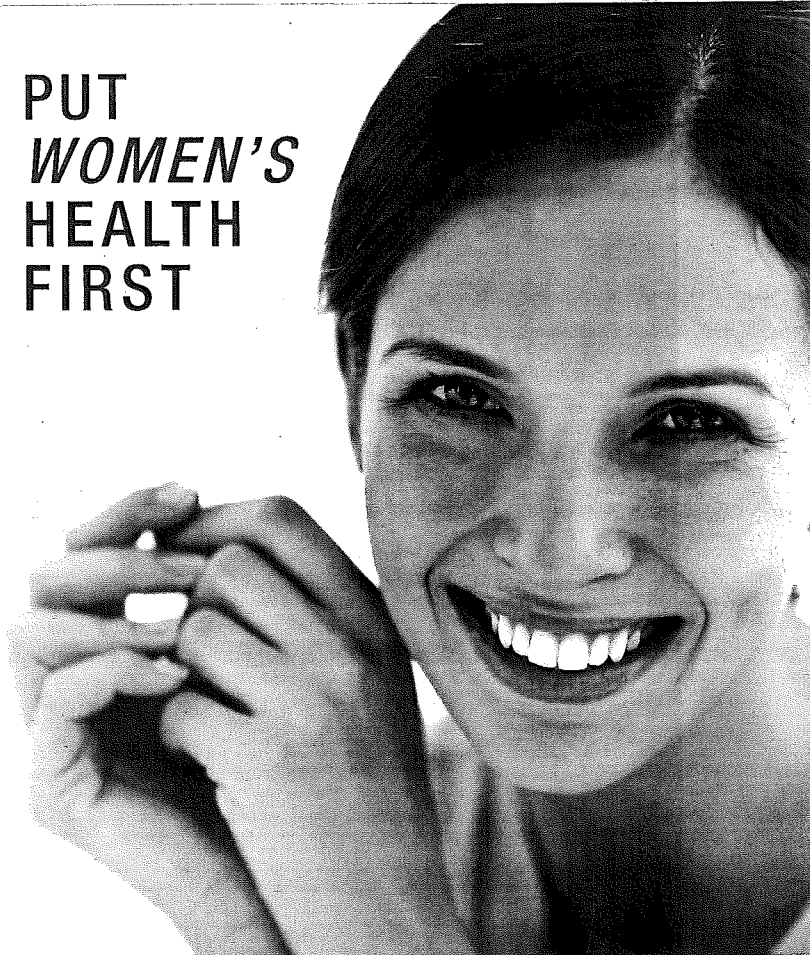
Additional Comments:

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



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 Fred Strickhouser
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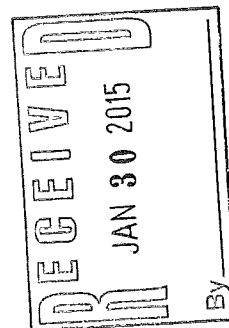
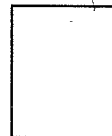
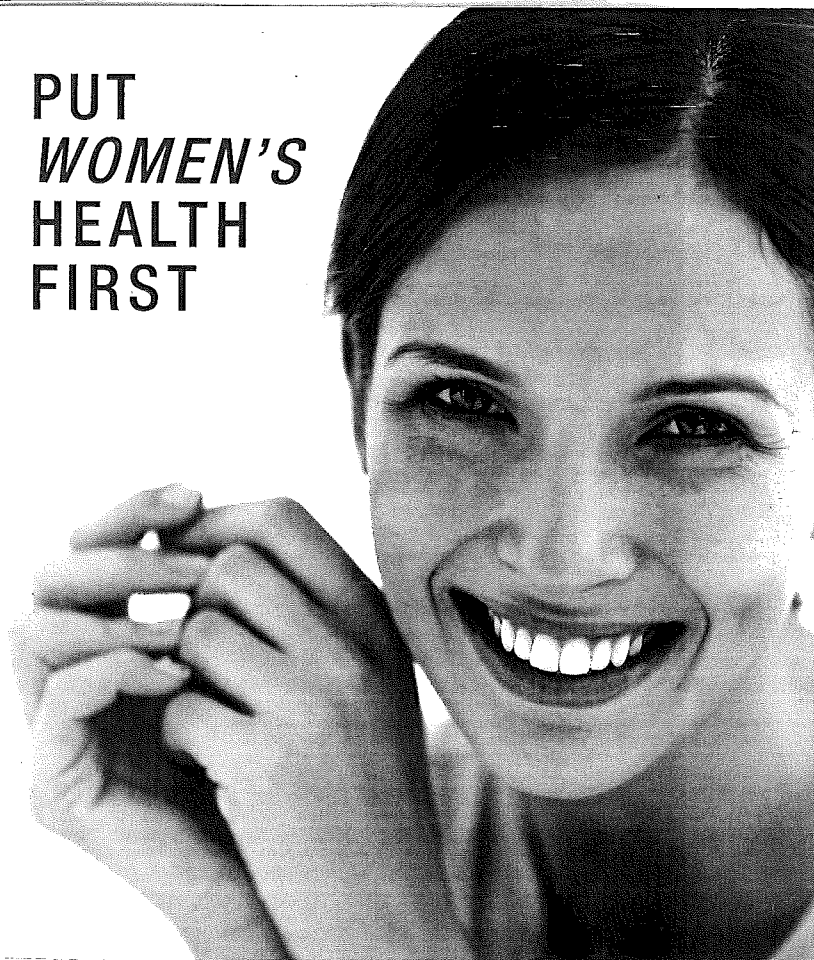
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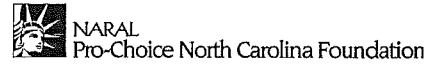
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Name Elizabeth Strob
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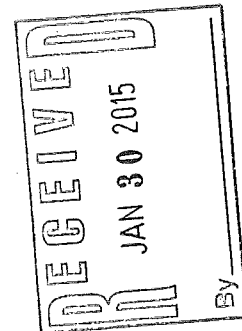
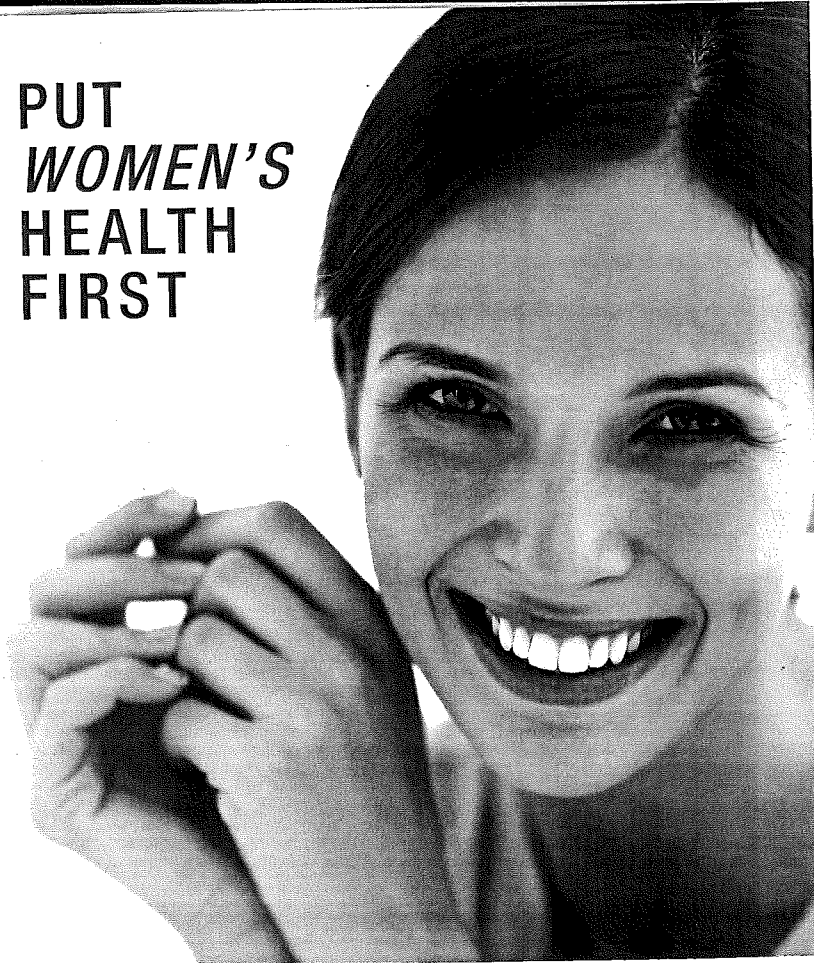
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Gretchen S. Stuart, MD, MPHTM, FACOG

DHHS hearing December 19, 2014

SB 353

Good Morning. My name is Dr. Gretchen Stuart. I am a practicing Board Certified Obstetrician-Gynecologist. I am also the Medical Director for Planned Parenthood of Central North Carolina. Thank you for the opportunity today to offer comments about proposed regulations. On behalf of Planned Parenthood, I would like to express our appreciation for being involved in the initial phase of the regulatory process.

Abortion is extremely safe. The United States Centers for Disease Control and Prevention show that abortion has a safety record with a less than 1% complication rate. Abortion is also common. One in three women will have an abortion by the time she is 45 years old. This means someone very close to you has made the decision to have an abortion.

My patients' safety is my top priority and I am proud of the excellent care I provide them. Opponents of safe and legal abortion have called for clinics in North Carolina to be regulated as "ambulatory surgical centers." However, requiring abortion providers to meet the same standards as facilities providing complex surgical procedures is medically inappropriate. Medical experts see these approaches for what they are – attempts to restrict access to abortion. They do nothing to advance women's health; instead, such targeted regulation increases costs and delays for my patients, and the women of North Carolina.

Many of my patients already travel a long distance to get the care they need. I think of my patient Felicia*. Felicia is a young mother of a 6-month old. Felicia lives in rural North Carolina and she drove 3 hours to see me this week. The clinic I work at was the only clinic available to her. Felicia recently had insurmountable personal hardships. She made the very personal and difficult decision to have an abortion to ensure she could take the best care of her family. I am happy that I was able to care for Felicia but frustrated she had to travel so far to receive the care she needed.

Access to safe and legal abortion is vital for my patients' safety and well-being. Patient safety is my number one concern and doctors like myself are supportive of regulations that will truly make care safer. However, there is no medical reason to put more burdens on women in our state.

We hope that the final regulations remain free of legislative interference in medical practice.

Thank you.

*Felicia is a pseudonym as the patient requested I not use her real name.

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Name Carol Stubbs
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Additional Comments:

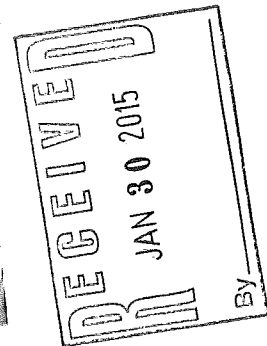
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 **NARAL**
Pro-Choice North Carolina Foundation

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

Planned Parenthood Action Fund of North Carolina

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JAN 30 2015

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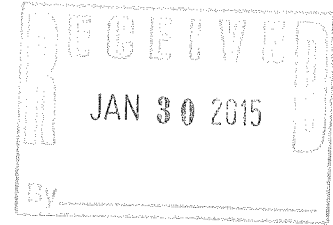
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January 30, 2015

The Office of Administrative Hearings
Rules Division
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Raleigh, NC 27699-6714

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Additional Locations:

San Francisco, CA
Washington, DC

www.prh.org

Subject: Proposed rules 10A NCAC 14E .0308, 10A NCAC 14E .0101, .0104, .0109, .0111, .0201, .0202, .0206, .0207, .0302-.0307, .0309-.0311, .0313, and .0315

Physicians for Reproductive Health (Physicians) is a doctor-led national advocacy organization that uses evidence-based medicine to promote sound reproductive health policies. Our members include physicians of all specialties from across the country, including many from North Carolina. Physicians unites the medical community and concerned supporters. Together, we work to improve access to comprehensive reproductive health care, including contraception and abortion, especially to meet the health care needs of economically disadvantaged patients. We write to comment on the proposed regulations from the Department of Health and Human Services for certification of clinics that provide abortion.

When it is legal and accessible, abortion has an excellent safety record. Abortion is one of the safest medical procedures in the United States. The vast majority of abortions, 88 percent, take place in the first trimester. During this period, the risk of major complications is very small, ranging from less than 0.05 to 0.2 percent.^{1,2} As a pregnancy advances, the medical risks with abortion increase gradually. Because risks do increase, it is crucial that women seeking abortion have prompt access, free of politically motivated restrictions.

These enviable safety statistics illustrate that there is no legitimate medical reason to single out abortion for more stringent regulations than those imposed in other outpatient medical settings. When the state regulates abortion, it is critical that it does so in a way that both ensures patient safety and preserves access. A state should never impose unjustified regulations in an attempt to prevent women from seeking abortion.

¹ Weitz TA et al. Safety of aspiration abortion performed by nurse practitioners, certified nurse midwives, and physician assistants under a California legal waiver. *American Journal of Public Health*, 2013, 103(3):454–461.

² Upadhyay UD et al. Incidence of emergency department visits and complications after abortion. *Obstetrics & Gynecology*. Published online December 8, 2014; DOI: 10.1097/AOG.0000000000000603.

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The draft regulations 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. Although not perfect, the regulations are based largely on current standards for abortion care, medical evidence, and practice guidelines, and reflect the careful consideration and input from medical professionals and public health authorities. The Department of Health and Human Services 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. We urge policy makers in North Carolina to keep this process free of political interference.

Without question, legal abortion in the United States has improved women's health outcomes. From 1958-1967, prior to *Roe v. Wade*, at least 3,400 women died from abortion procedures, almost all of which were illegal.³ For each death suffered from unsafe abortion, many other women had illegal abortions in circumstances that were degrading and led to dangerous complications. The number of deaths fell rapidly after abortion was legalized, as the medical community had predicted. We have long known that legal, accessible abortion means safe abortion. North Carolina lawmakers recognized this when our state became one of the first states to decriminalize abortion in 1967. North Carolinians today do not want to see legal abortion disappear in the state through politically motivated attacks.

In the past few years, the state of North Carolina has hindered women seeking abortion by mandating scripted information, imposing an unnecessary waiting period, and requiring the display of an ultrasound image while she listens to a detailed description. Thankfully, these provisions are not currently in effect due to a court order.

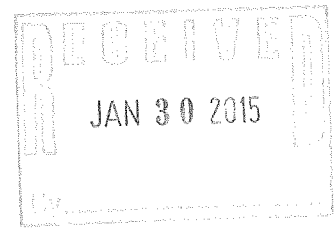
We know that people have complicated feelings when it comes to abortion, but we believe that we can all agree that women should have access to the health care that they need. When abortion is not accessible, it becomes less safe. We also know that women who have abortions come from all walks of life. Every woman is unique and every situation is different. No matter the circumstances, the North Carolina physicians in our network are dedicated to providing the women and families of this state with quality and compassionate health care.

³ Stanley Henshaw, Unintended pregnancy and abortion in the USA: Epidemiology and public health impact, *Management of Unintended and Abnormal Pregnancy* at 33 (2009).

While we regret that political attacks have singled out abortion in North Carolina, we thank the Department of Health and Human Services for their thoughtful process and their efforts to preserve the health needs of women of the utmost importance.



Planned Parenthood Health Systems
Action Fund, Inc.



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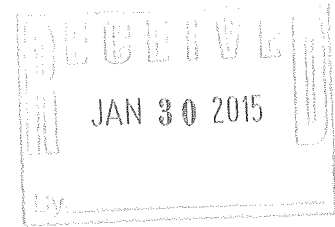
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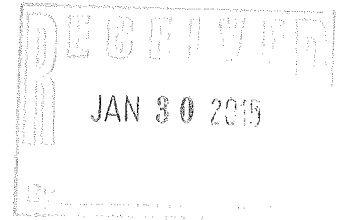
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FIRST NAME:

LAST NAME:

Carley Swain

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carley14@hotmail.com 27455

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Name Joshua Swan

E-mail address Joshua.swan@bellsouth.net

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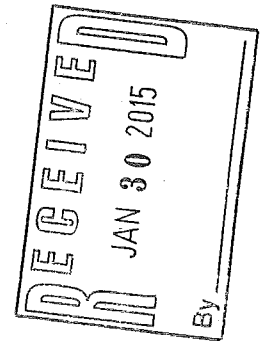
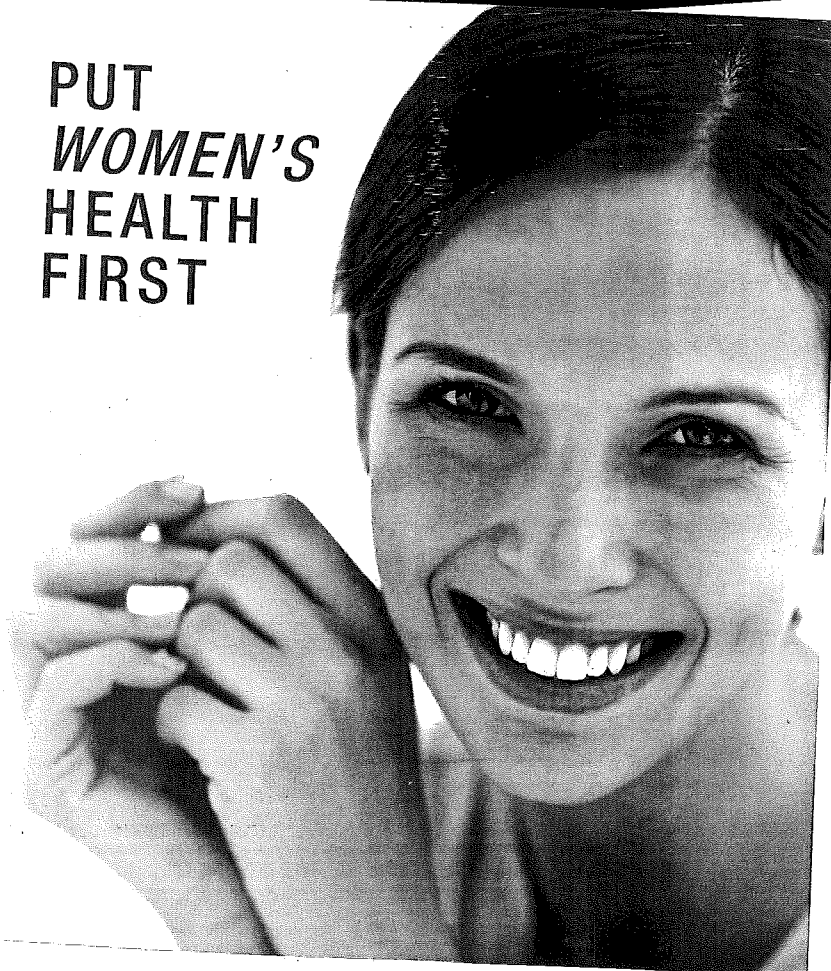


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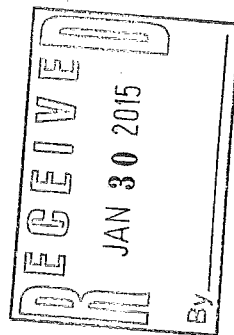
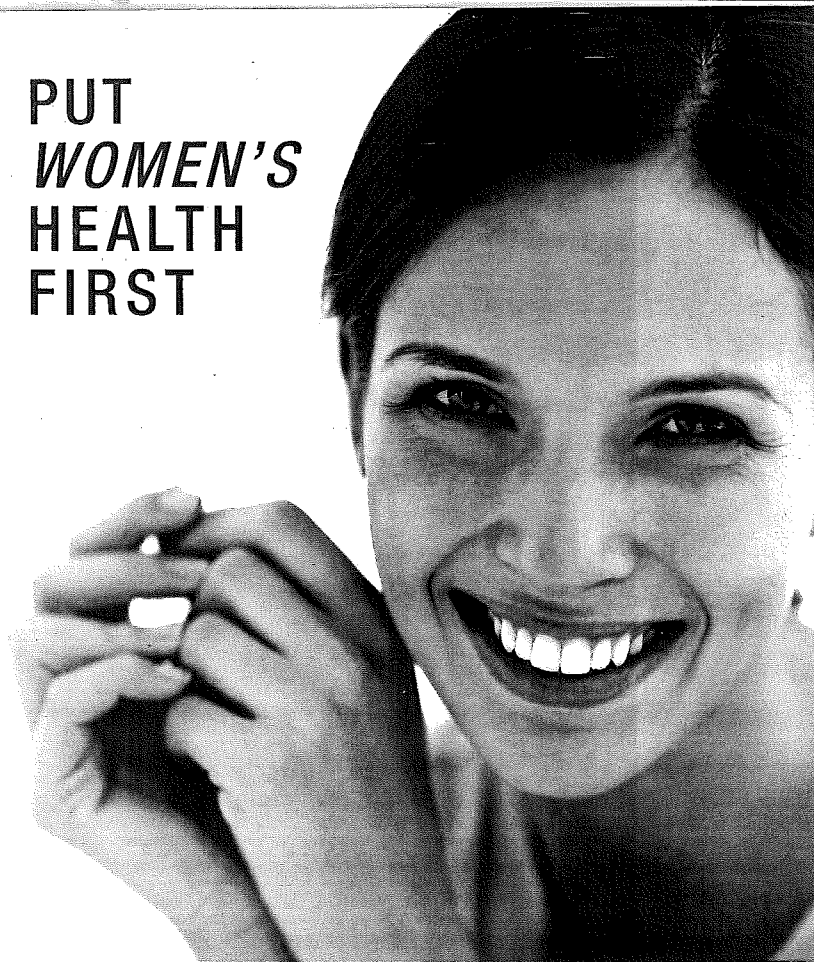
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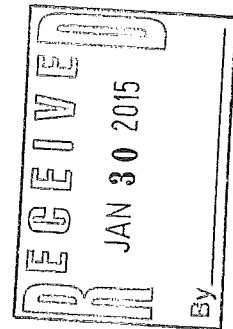
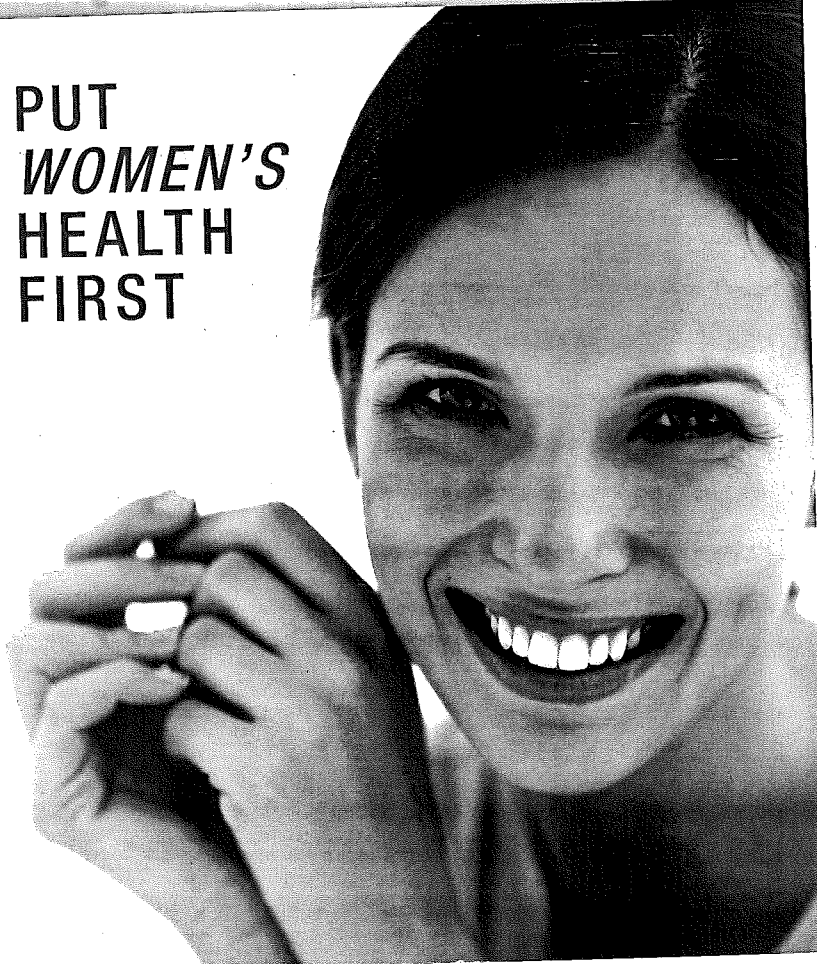


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Name Patrick Synure
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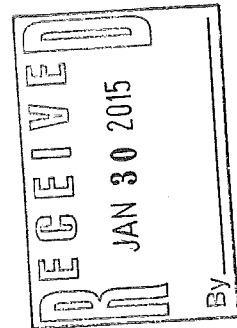
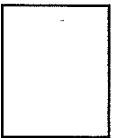
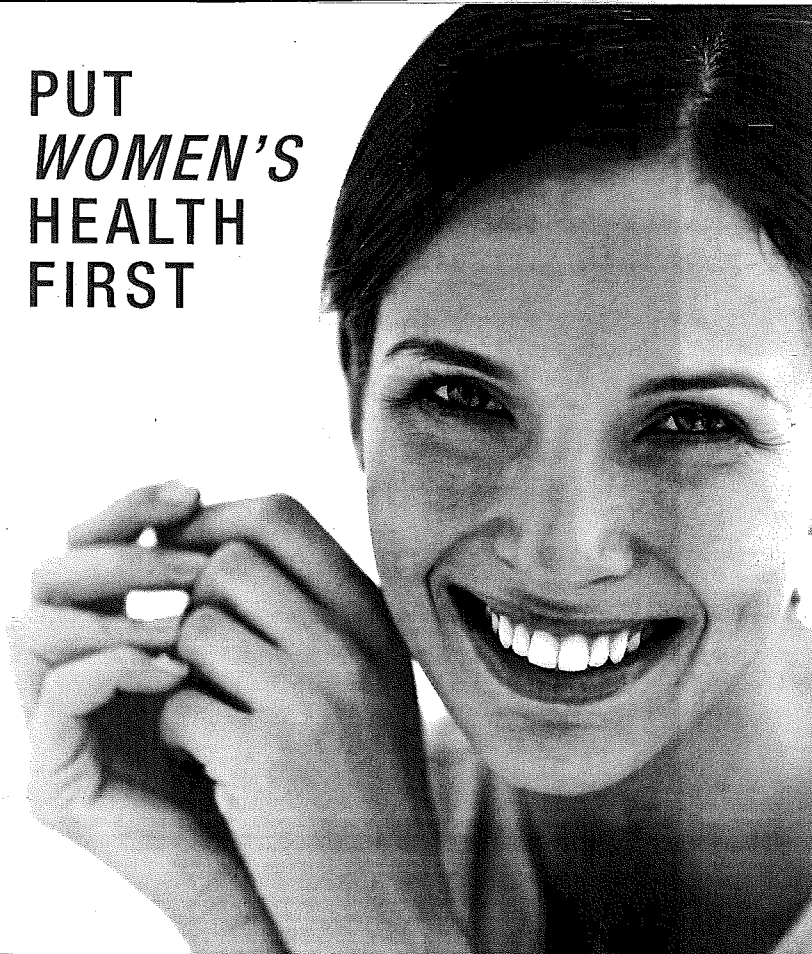


NARAL
Pro-Choice North Carolina Foundation

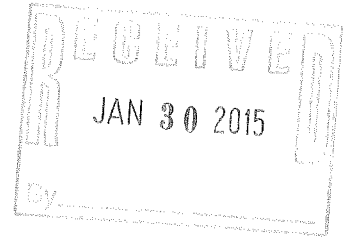


Planned Parenthood Action Fund of North Carolina

PUT WOMEN'S HEALTH FIRST



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



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Action Fund, Inc.

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FIRST NAME:

Mary

LAST NAME:

Szymkowsky

EMAIL:

vetmbs01@gmail.com

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

TAKE ACTION!

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Name Neil Tilton

E-mail address ntilton@gmail.com

ZIP Code 27612

Additional Comments:

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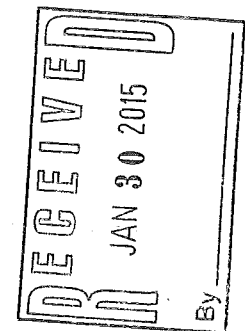
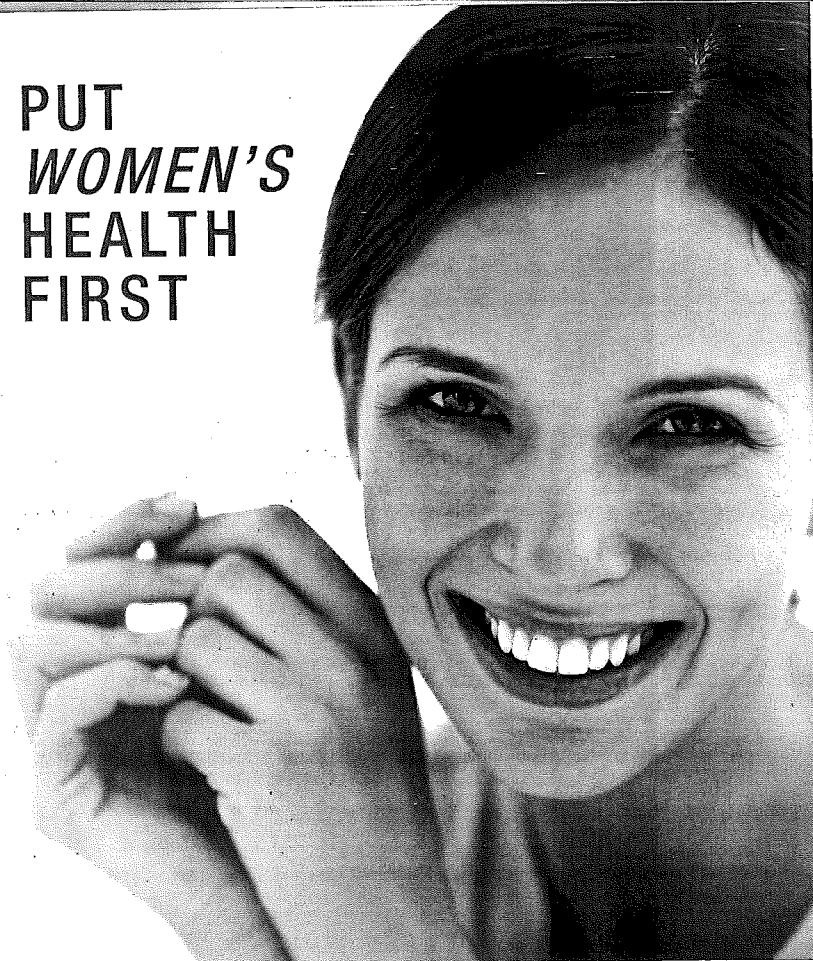


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Pro-Choice North Carolina Foundation



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Name Joseph Tambertino
E-mail address jtamberti@unc.edu
ZIP Code 28804

Additional Comments:

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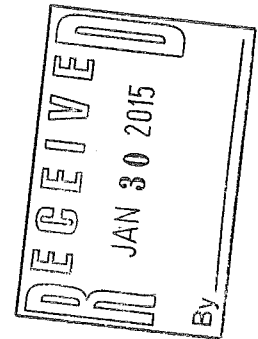
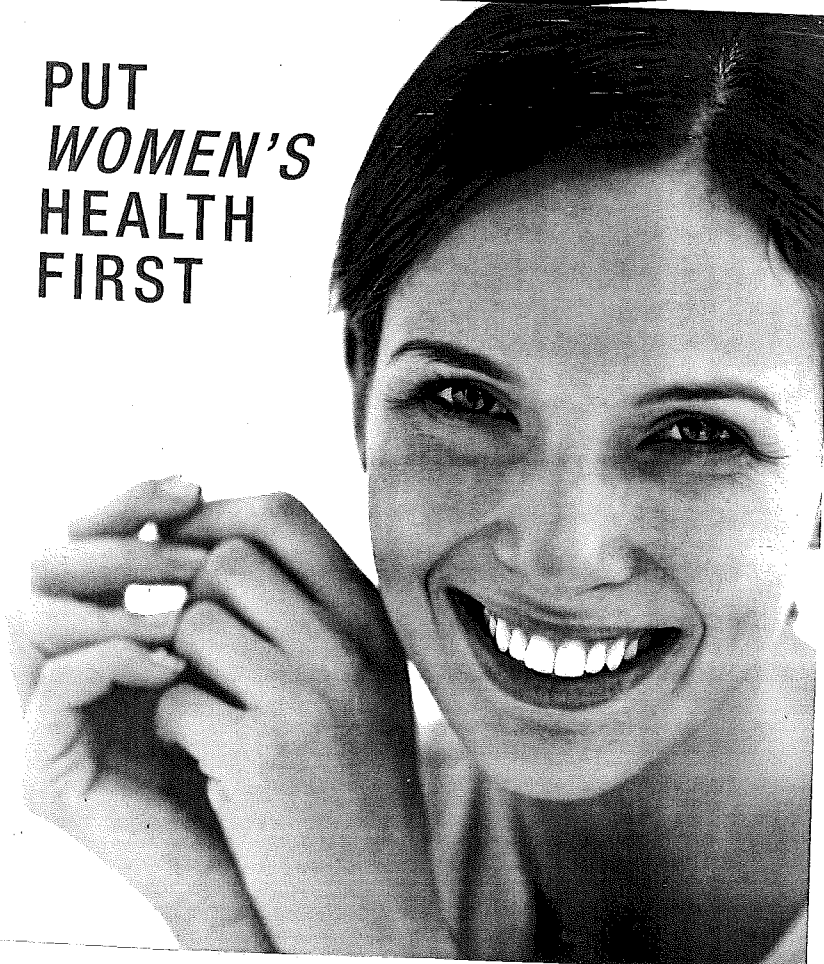


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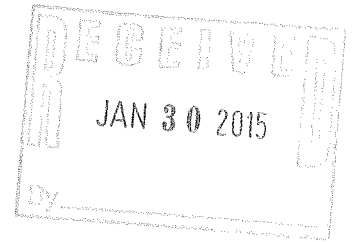


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FIRST NAME:

LAST NAME:

Lindsey

Tavares

EMAIL:

ZIP:

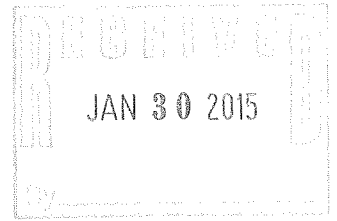
ltavares@unca.edu

28801

Optional Comment field:

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FIRST NAME:

LAST NAME:

Tori

TAVARES

EMAIL:

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vtavares@gmail.com

28270

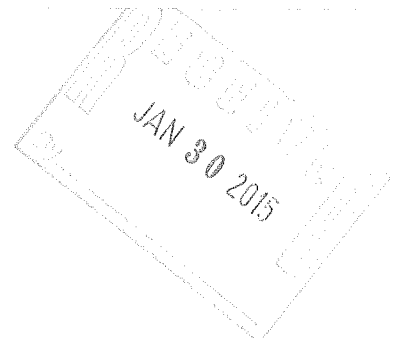
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FIRST NAME:

LAST NAME:

Kelsey

Tavares

EMAIL:

ZIP:

kelsey.tavares@pphs.org 28801

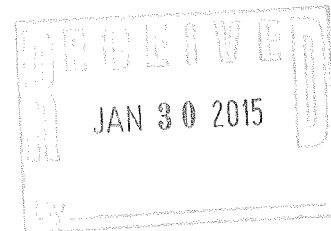
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FIRST NAME:

LAST NAME:

Mary Taylor

EMAIL:

ZIP:

28806

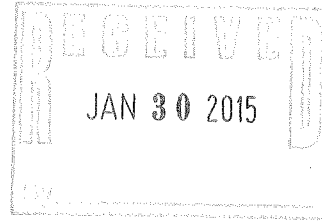
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FIRST NAME:

Carol

LAST NAME:

Teal

EMAIL:

ZIP:

27612

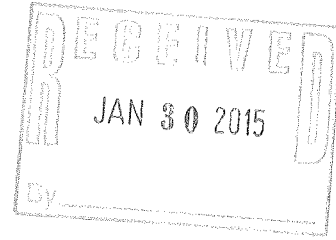
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FIRST NAME:

LAST NAME:

Rebecca Telberg

EMAIL:

ZIP:

beckers300@gmail.com 28801

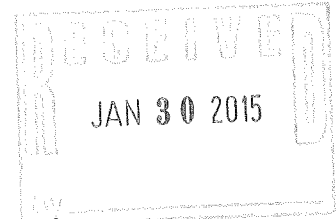
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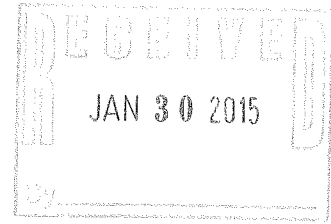
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FIRST NAME:

Liz

LAST NAME:

Testa-Vasser

EMAIL:

Hesta@nc.rr.com

ZIP:

28303

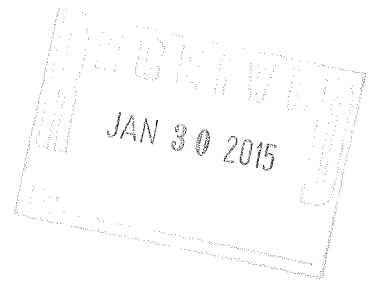
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FIRST NAME:

Monika

LAST NAME:

Thigpen

EMAIL:

Monika.Thigpen@ppsath.org

ZIP:

28304

Optional Comment field:

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Name Naomi Thompson
E-mail address no email/computer
ZIP Code 27200

Additional Comments:

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

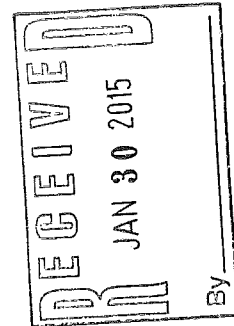
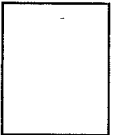
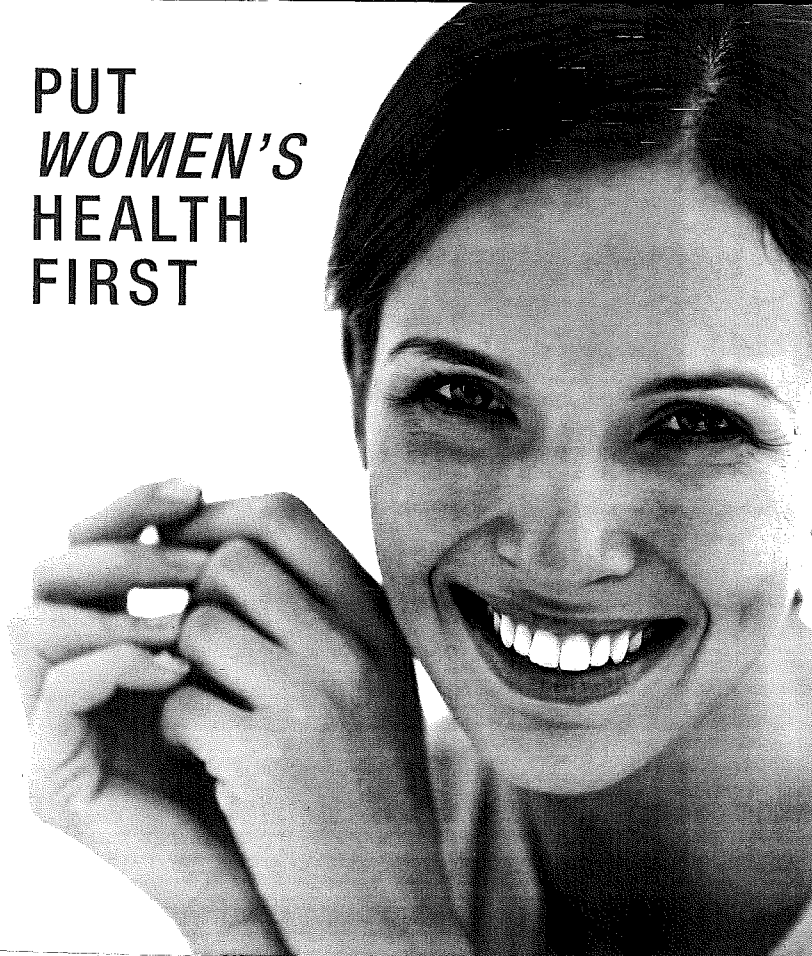


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Name Kate Traylor

E-mail address KTraylor151@live.com

ZIP Code 27678

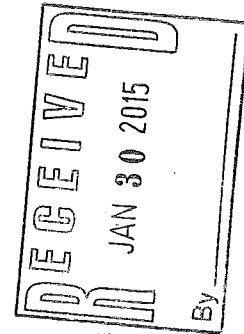
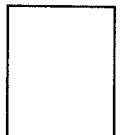
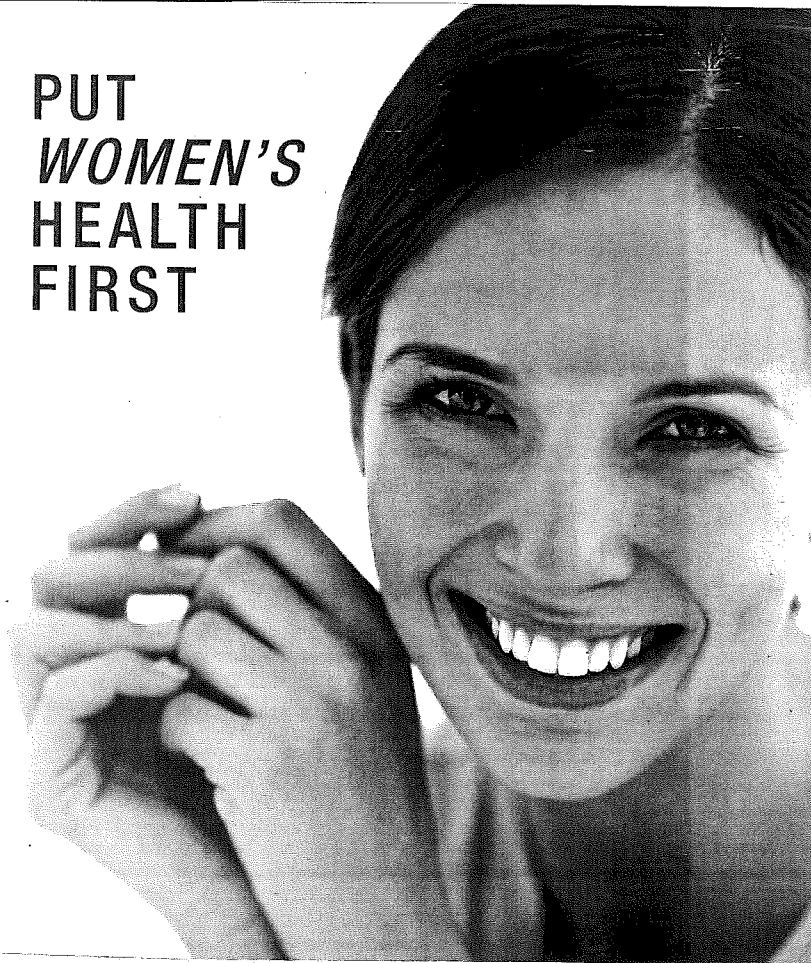
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Name Cynthia Thomason
E-mail address Cindy.Thomason@ncdhhs.gov
ZIP Code 27621

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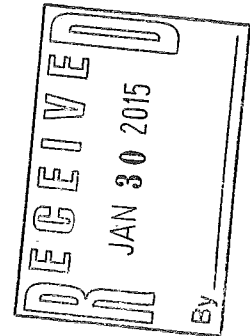
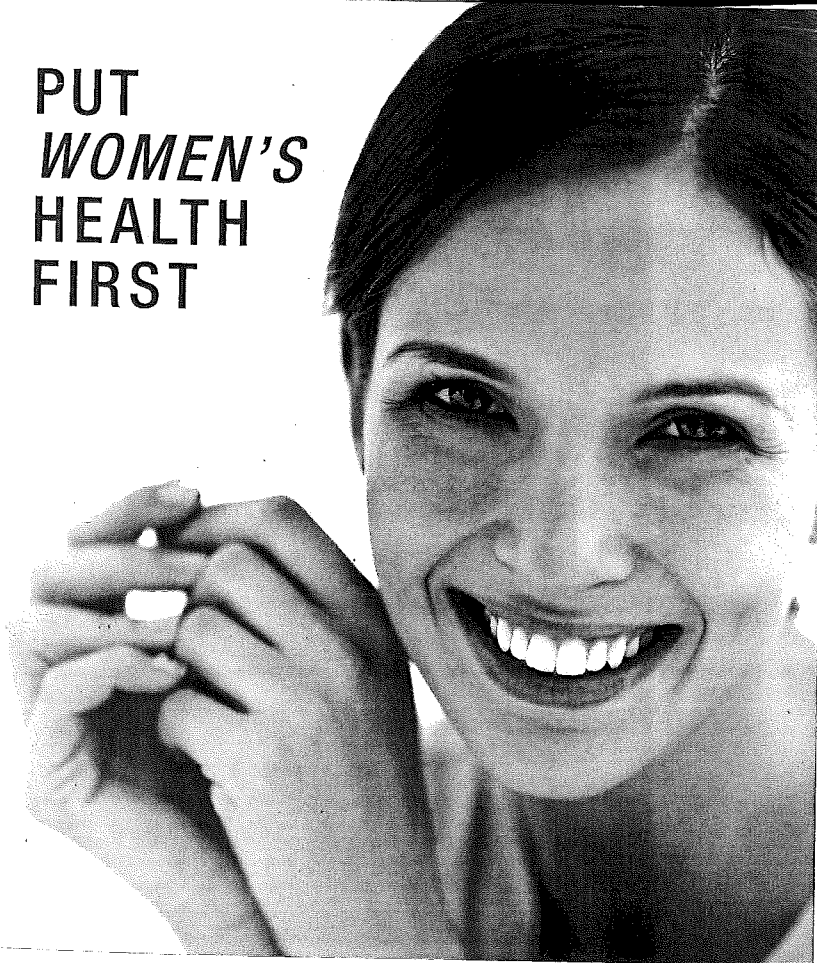


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Name Tim Thorb

E-mail address ttthor@carolina.unc.edu

ZIP Code 27610

Additional Comments:

What is discussed to
a doctor or a female
about her body, should
only be the concern of
them.

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

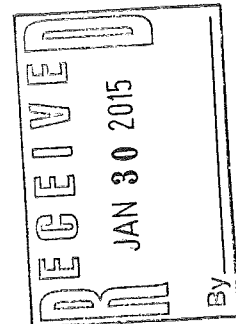
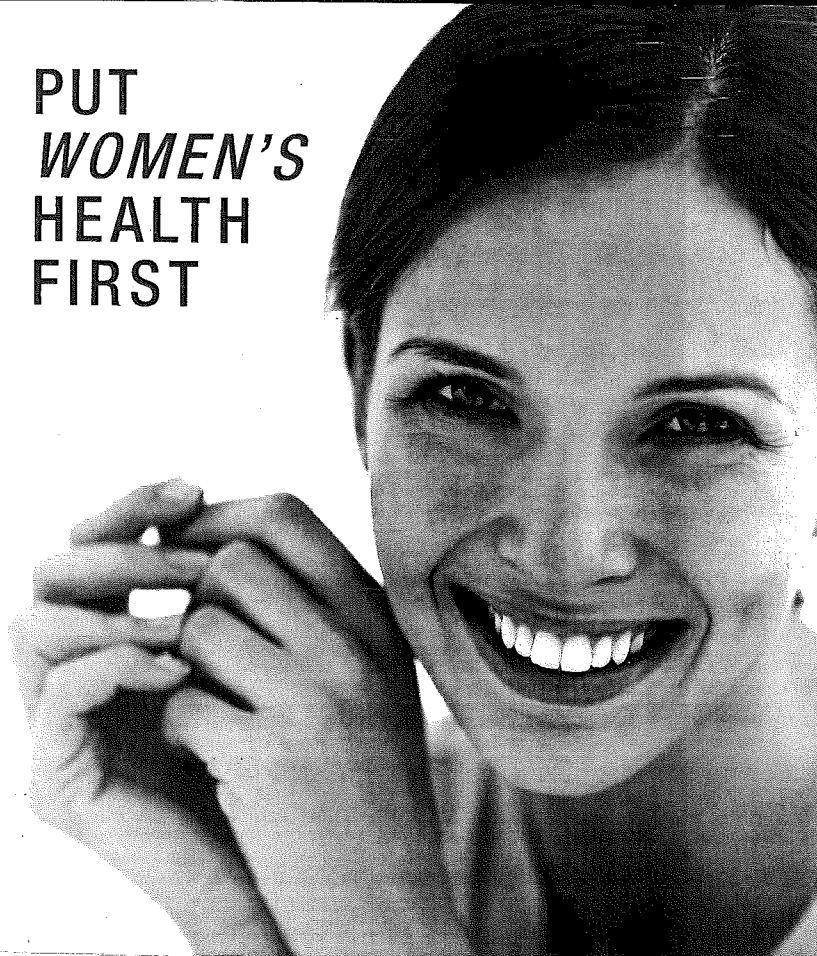


NARAL
Pro-Choice North Carolina Foundation

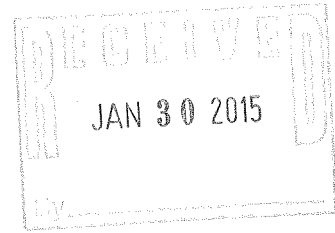


Planned Parenthood Action Fund of North Carolina

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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:

BLAIR TILLER

EMAIL:

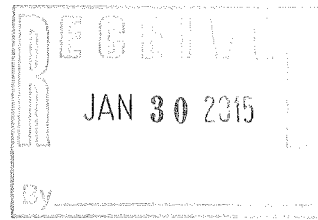
ZIP:

eblairtiller@yahoo.com

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:

Rachel

Tillett

EMAIL:

ZIP:

tillett@emil.meredith.edu 27614

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 Terry Tillman
E-mail address letithappening@gmail.com
ZIP Code 28376

Additional Comments:

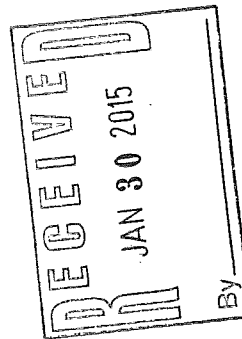
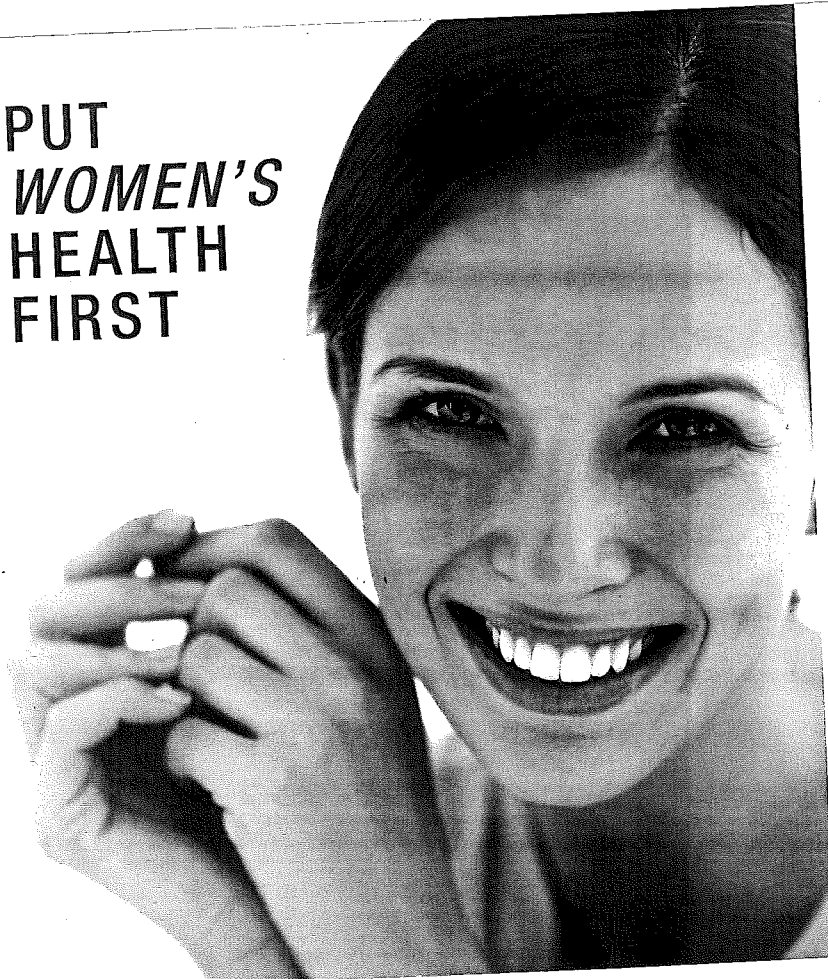
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Pro-Choice North Carolina Foundation

 **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
Raleigh, NC 27699-2701

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Name Toan To

E-mail address tt@unc.edu

ZIP Code 20805

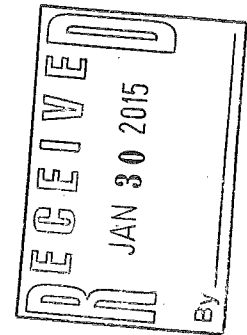
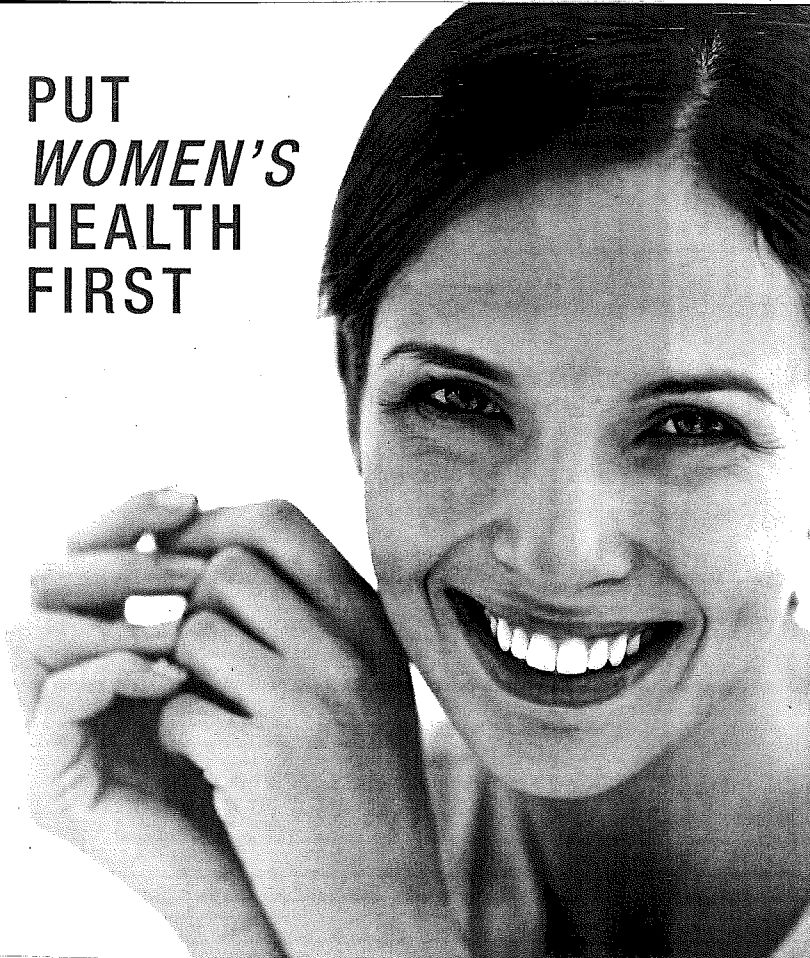
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Planned Parenthood Action Fund of North Carolina

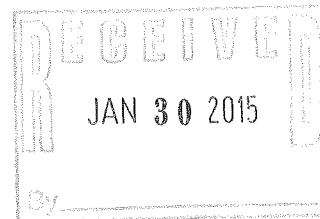
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FIRST NAME:

Lorraine

LAST NAME:

Tan

EMAIL:

ZIP:

28374

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 Changyi Tong

E-mail address _____

ZIP Code 28804

Additional Comments:

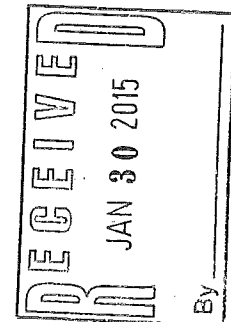
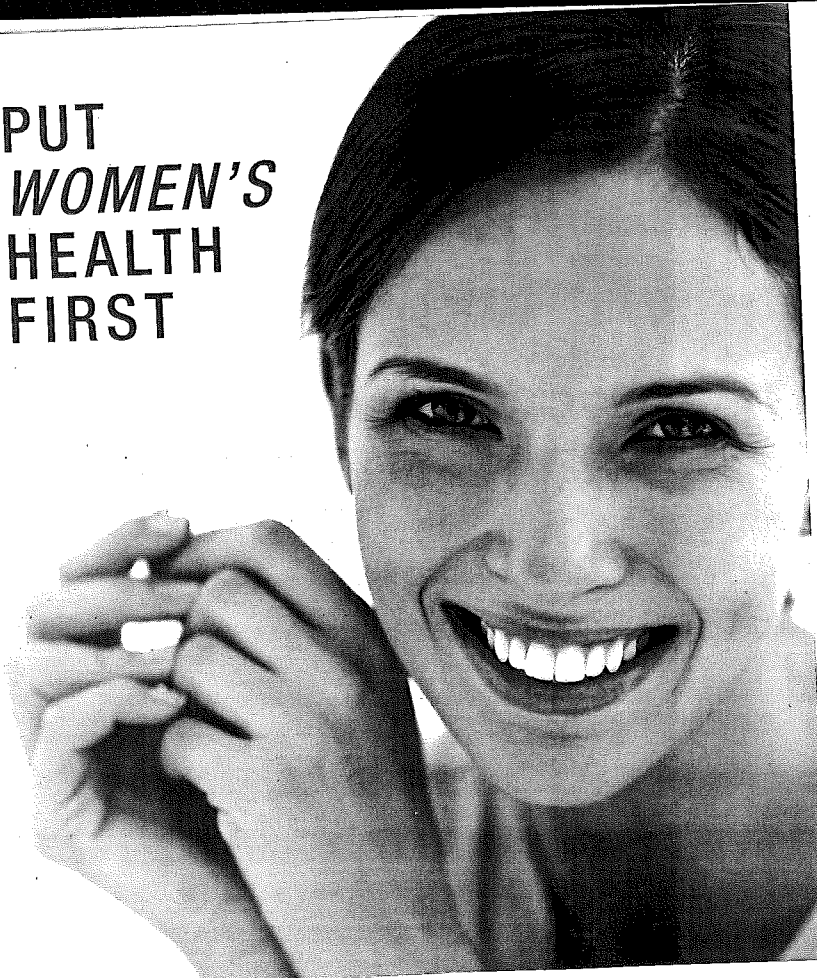
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Pro-Choice North Carolina Foundation

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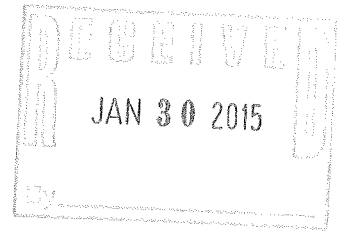
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Division of Health Service Regulation
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FIRST NAME:

Bates

LAST NAME:

Toone

EMAIL:

N/A

ZIP:

28411

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 Barbara Toth

E-mail address bltath@earthlink.net

ZIP Code 28804

Additional Comments:

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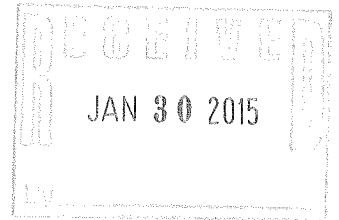
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FIRST NAME:

LAST NAME:

Ashley

Travers

EMAIL:

ZIP:

atrav@gmail.com

28732

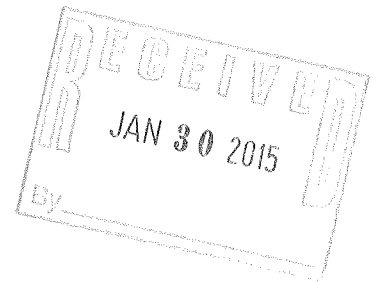
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FIRST NAME:

Alie

LAST NAME:

Treciak

EMAIL:

atreciak@gmail.com

ZIP:

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 José Trujillo
E-mail address jtrujillo@mca
ZIP Code 28739

Additional Comments:

It is not only putting women health/lives first. It is also putting avoiding unnecessary pain to potential new lives who don't have a fully equipped family to arrive into

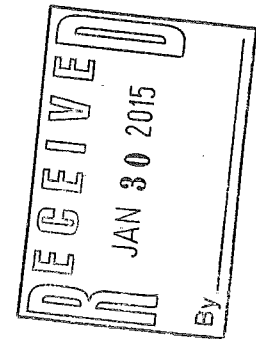
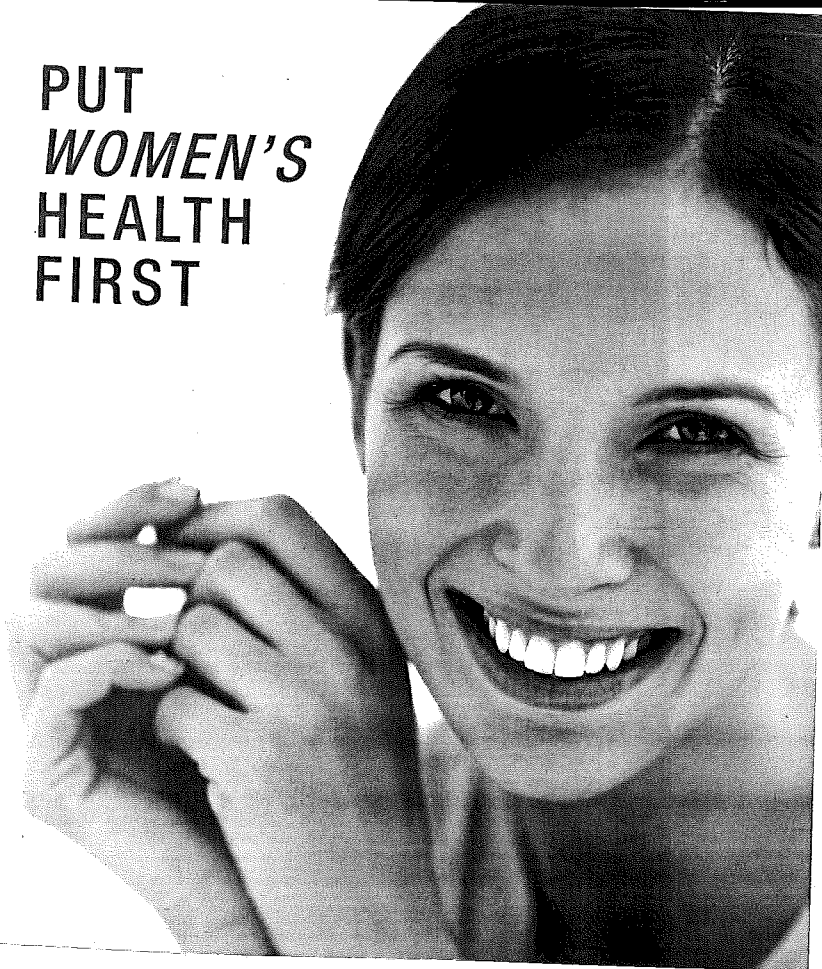
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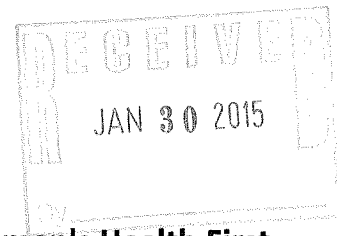
PUT WOMEN'S HEALTH FIRST



Nadine Pfeiffer
Division of Health Service Regulation
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FIRST NAME:

LAST NAME:

William

Trexler

EMAIL:

ZIP:

btrexler@gmail.com

28715

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 Trolenberg
E-mail address kristol@yahoo.com
ZIP Code 27606

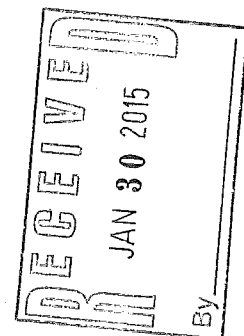
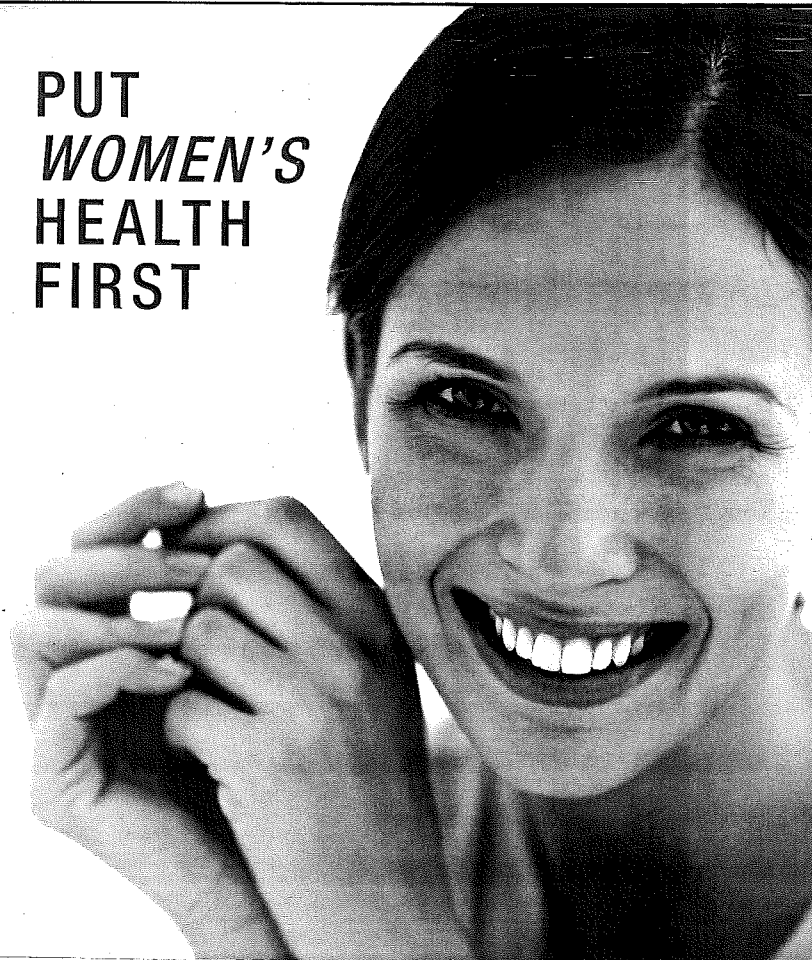
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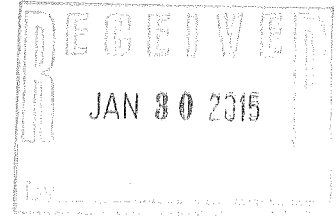
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FIRST NAME:

LAST NAME:

ARUIE TROWBRIDGE

EMAIL:

ZIP:

trowbridgeag@gmail.com 28801

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 Dr John F Troy SR

E-mail address jt@outreachministries@gmail.com

ZIP Code 28303

Additional Comments:

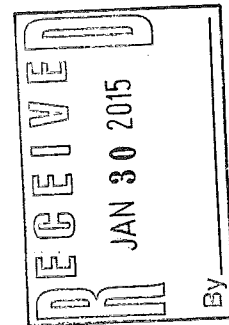
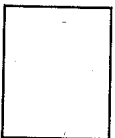
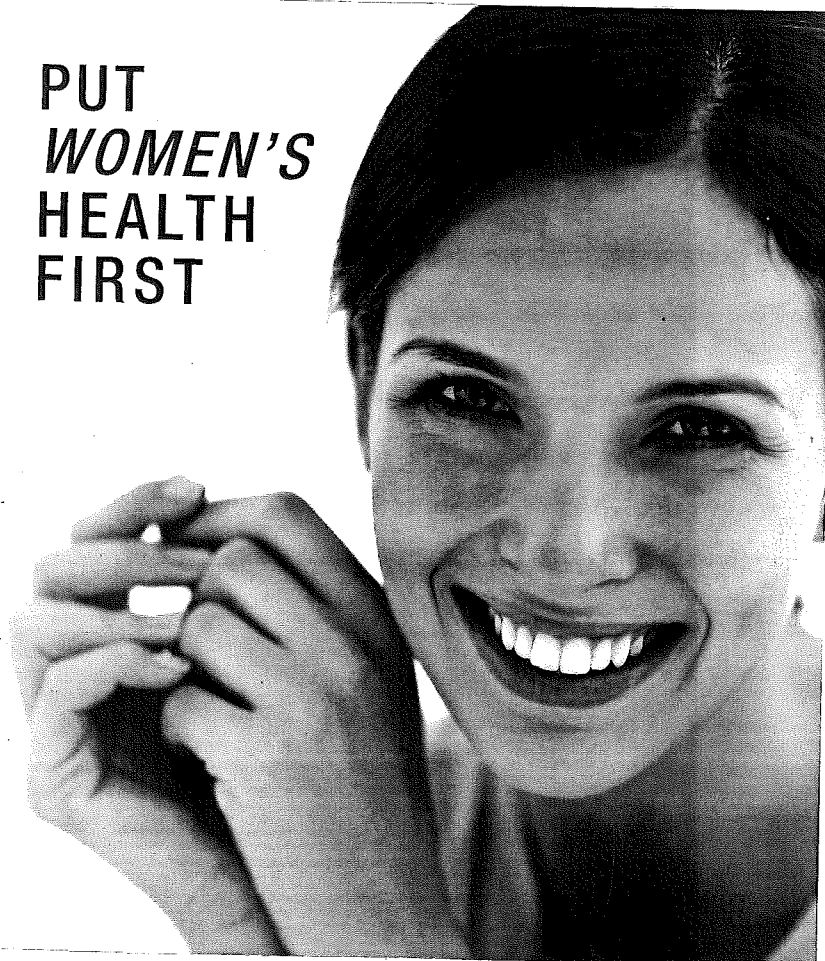
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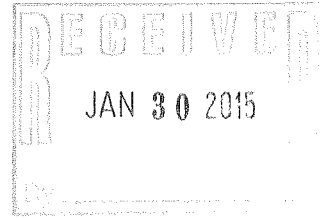
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FIRST NAME:

LAST NAME:

Nikki

Trax

EMAIL:

ZIP:

truaxmon@email.meredith.edu 27587

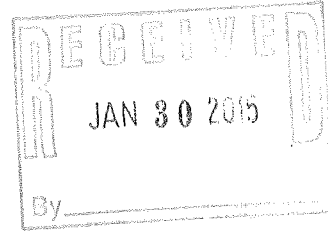
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Yes, I would like to receive updates from organizations supporting this comment.

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FIRST NAME:

LAST NAME:

Middleton

Tucker

EMAIL:

ZIP:

tuckernieemail.meredith.edu 27610

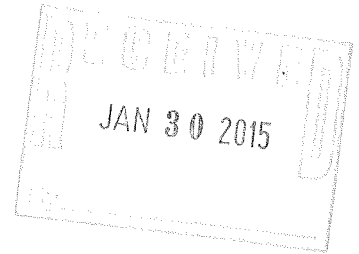
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| | |
|------------------------------|-------------------|
| FIRST NAME: | LAST NAME: |
| <u>Leigh-Mae</u> | <u>Turner</u> |
| EMAIL: | ZIP: |
| <u>librascales@gmail.com</u> | <u>28304</u> |

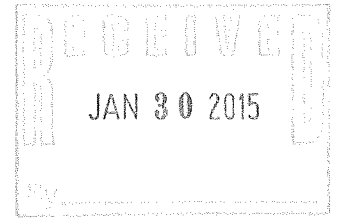
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FIRST NAME:

LAST NAME:

Matt

Turpin

EMAIL:

ZIP:

mturpin@unca.edu

28801

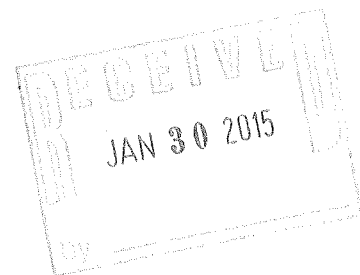
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FIRST NAME:

LAST NAME:

SUZANNE

Tyler

EMAIL:

ZIP:

Suzanne.kity@yahoo.com

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TAKE ACTION!

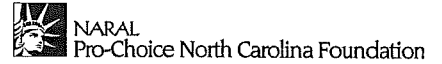
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Name Sam Tyson
E-mail address Sam.h.tyson@gmail.com
ZIP Code 28804

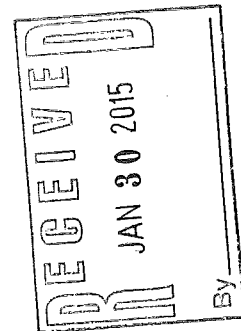
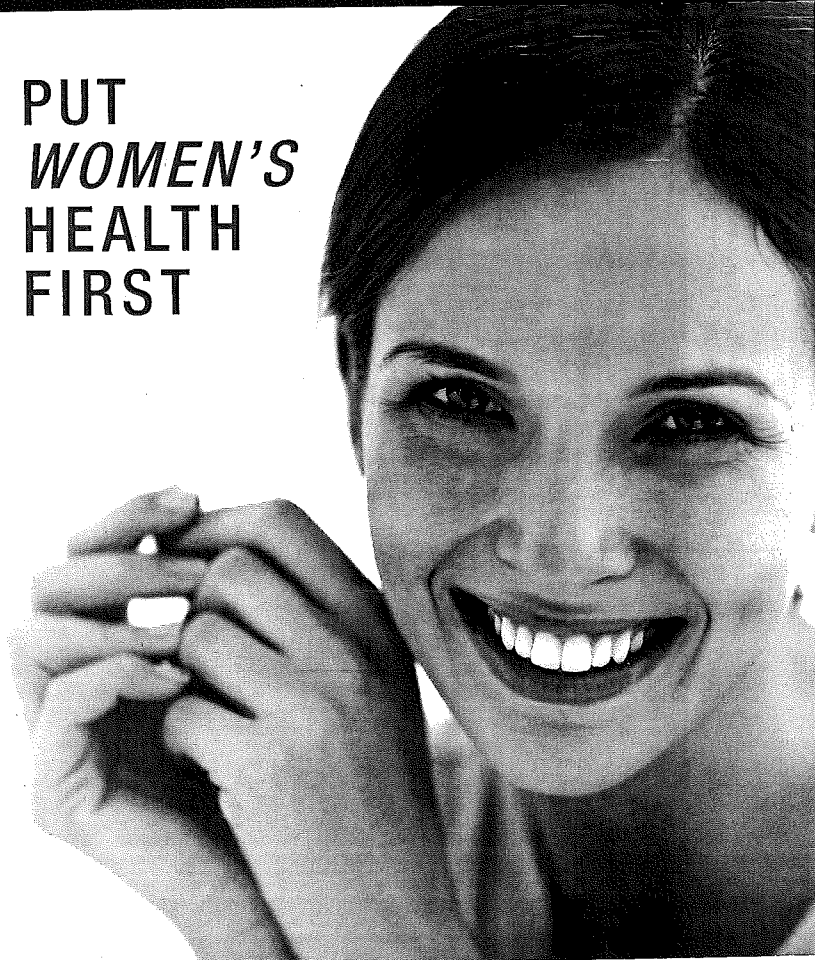
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Planned Parenthood Action Fund of North Carolina

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

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Name Ben Tzinberg
E-mail address B.Tzinberg@uncc.edu
ZIP Code 28801

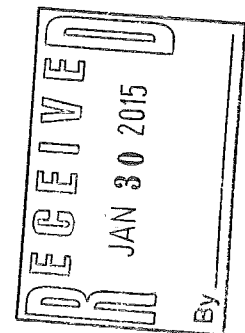
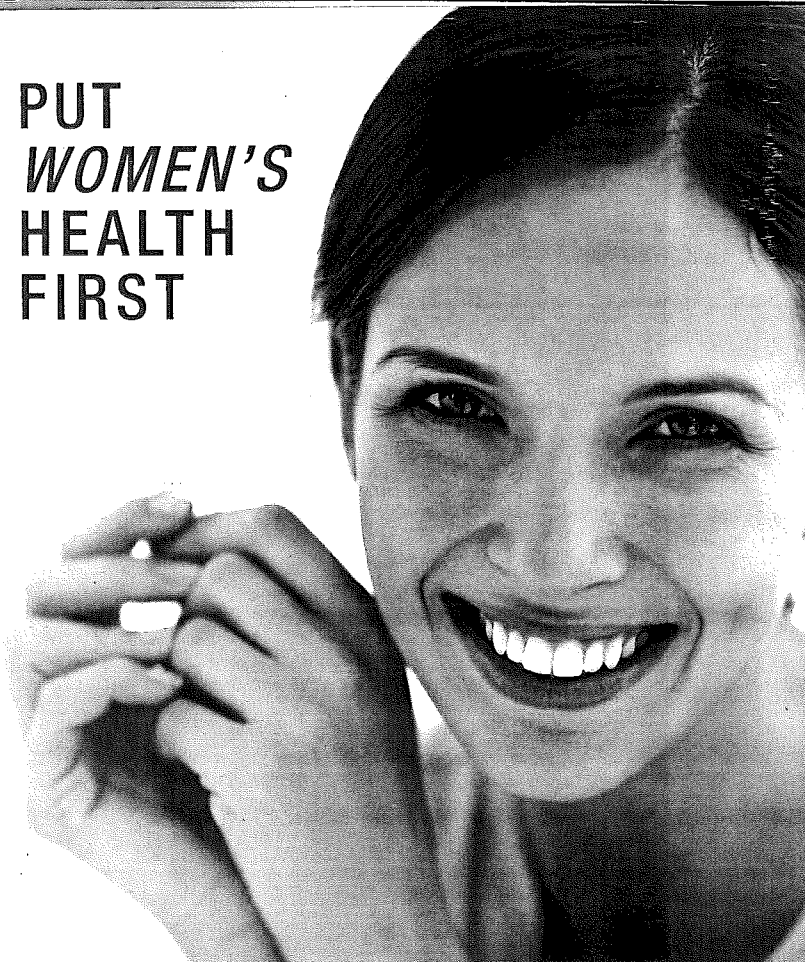
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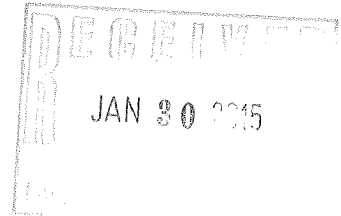
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FIRST NAME:

Chelsea

LAST NAME:

Uhlman

EMAIL:

ceuhlman@gmail.com

ZIP:

27560

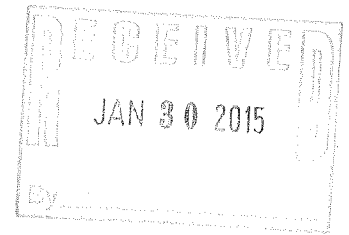
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FIRST NAME:

LAST NAME:

Carmen

Vaca

EMAIL:

ZIP:

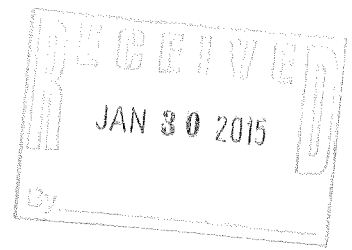
cvaca@ncsu.edu

28277

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FIRST NAME:

LAST NAME:

Andrés Vacca

EMAIL:

ZIP:

andres.vacca00@gmail.com 28861

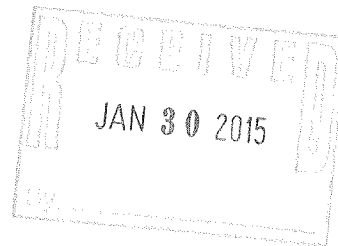
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FIRST NAME:

LAST NAME:

Gloria

Vaca

EMAIL:

ZIP:

gvaca@yahoo.com

28277

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Name Carolyn N. Van Sant
E-mail address Do not have e-mail
ZIP Code _____

Additional Comments:

Carolyn Van Sant
502 North St.
Chapel Hill, NC 27514-3725

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NARAL
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

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Name Amy Van Udek
E-mail address amy319india@yahoo.com
ZIP Code 28739

Additional Comments:

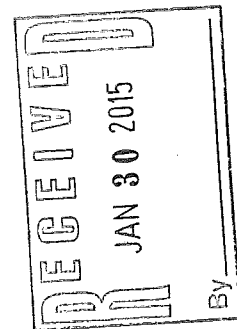
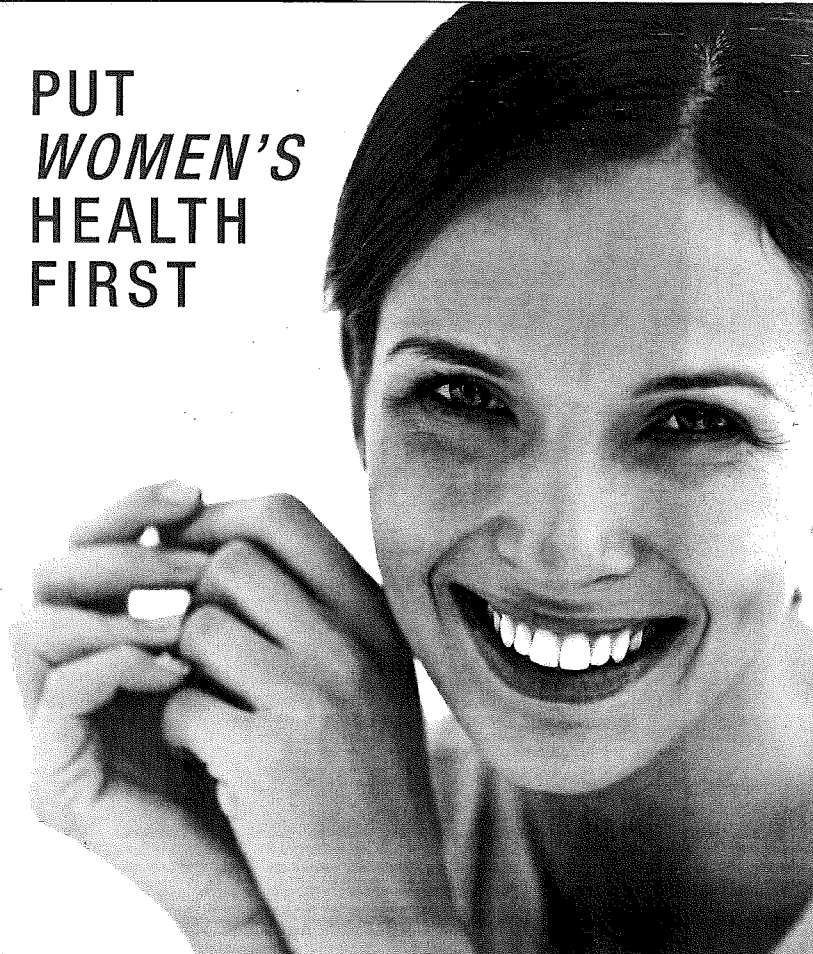
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Division of Health Service Regulation
2701 Mail Service Center
Raleigh, NC 27699-2701

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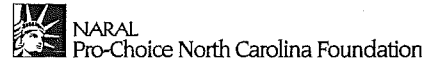
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Name MARGARET VAUGHN
E-mail address margaret.vaughn@gmail.com
ZIP Code 27607

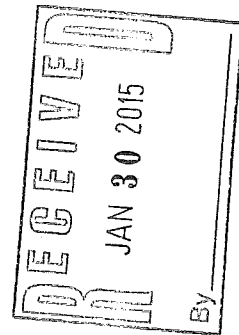
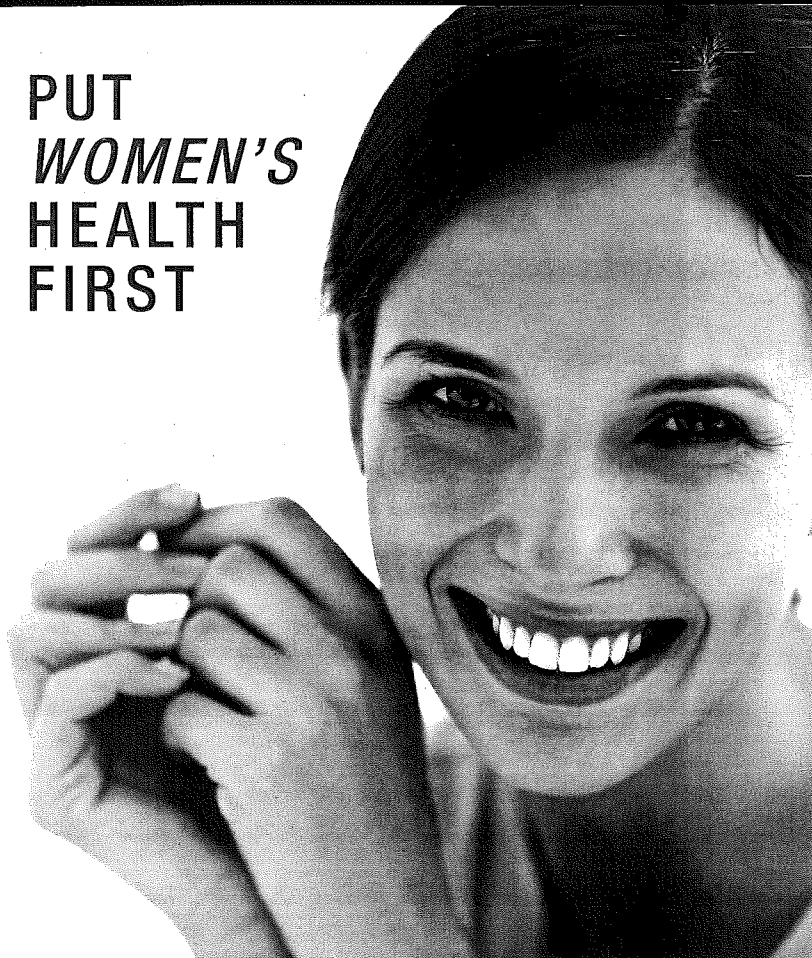
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Name Evelyn Vazquez
E-mail address evelintlesky1210@gmail.com
ZIP Code 28348

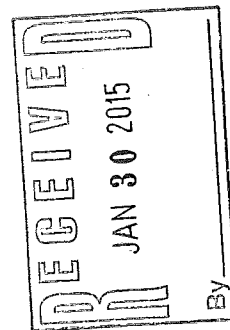
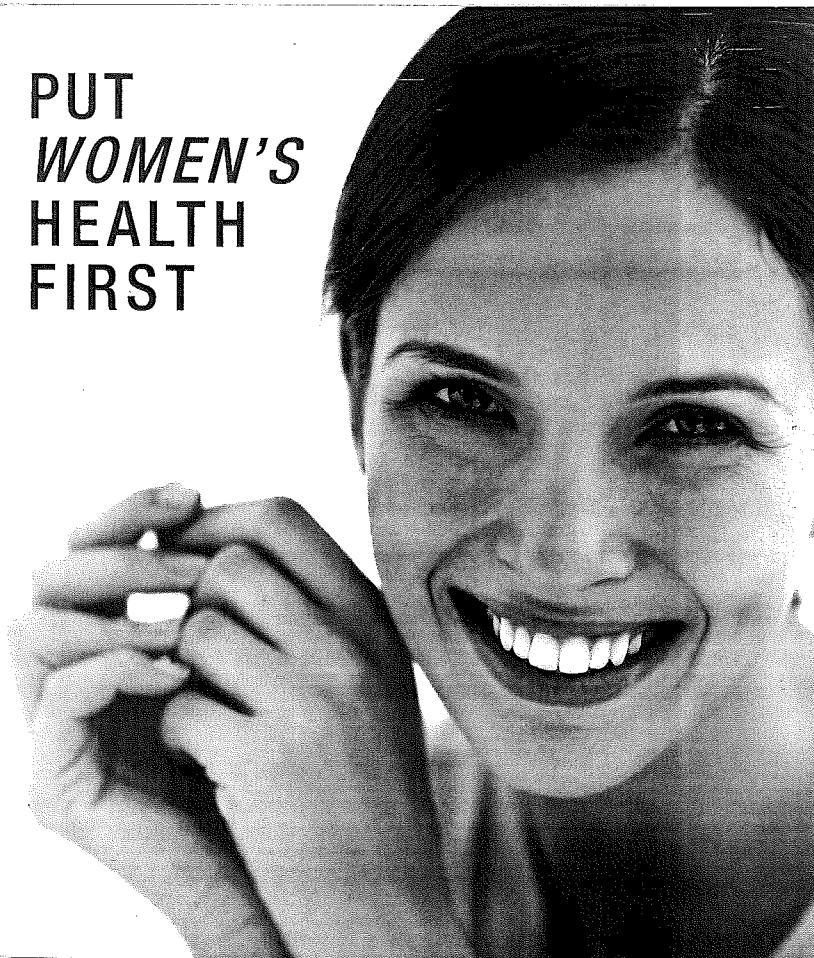
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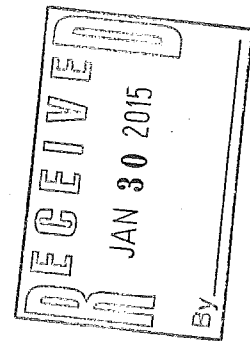
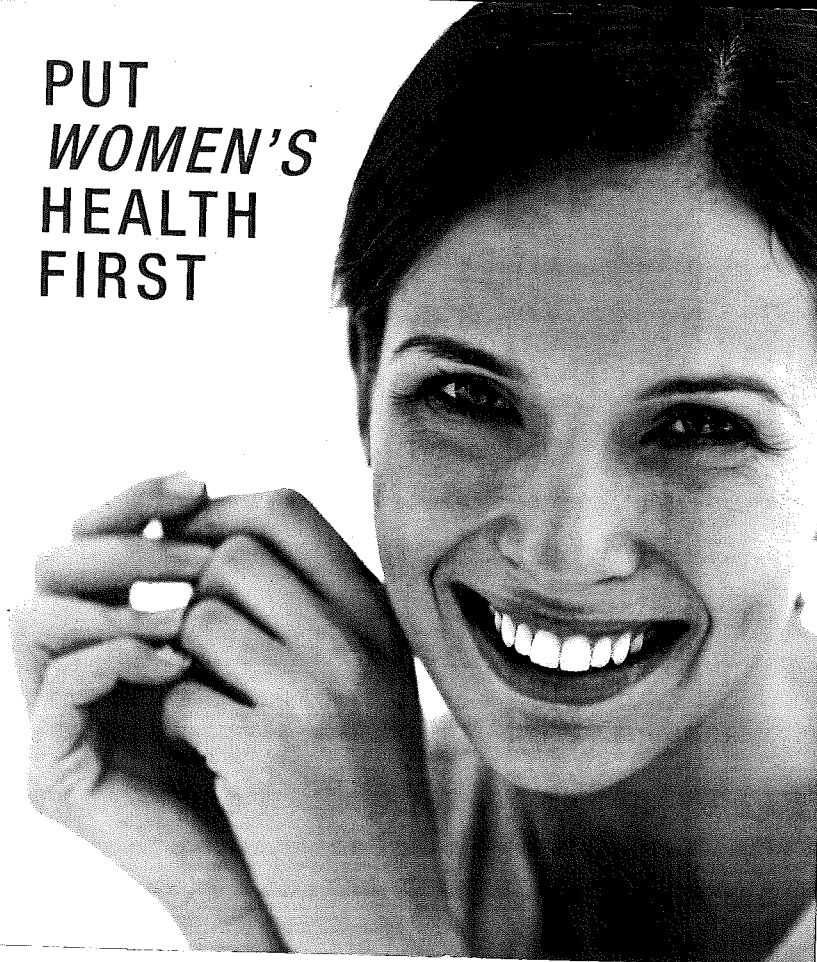
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Name Gwen Veazey
E-mail address gveazey103@charter.net
ZIP Code 28655

Additional Comments:

Please have compassion
for the mentally ill, poor,
and otherwise disadvantaged
girls and women who
choose abortion rather
than parenthood.
(I've worked with them)

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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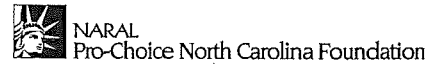
Name Taylor Vicenty

E-mail address _____

ZIP Code 28110

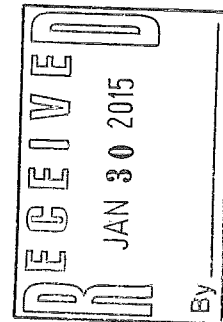
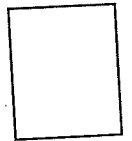
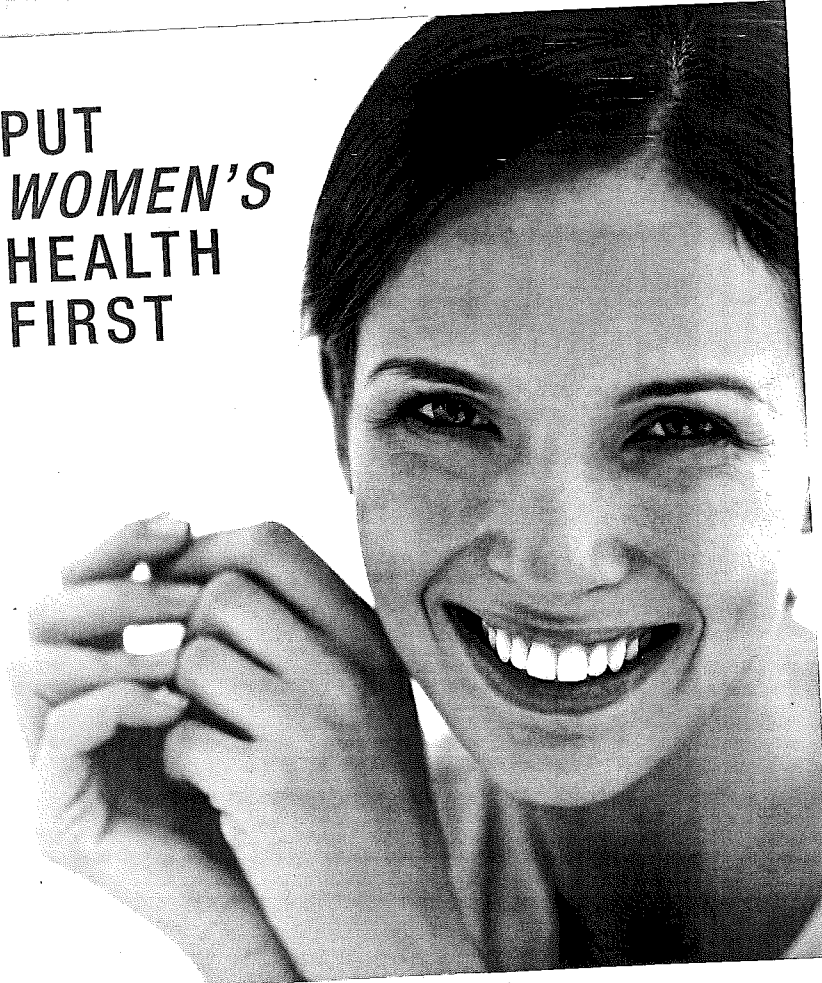
Additional Comments:

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 AB. VICKERS

E-mail address _____

ZIP Code 27858

Additional Comments:

I fully support
these recommendations
AV.

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



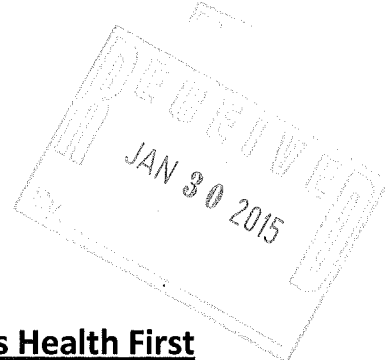
NARAL
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina



Planned Parenthood Health Systems
Action Fund, Inc.



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FIRST NAME:

Katherine

LAST NAME:

Villas

EMAIL:

ZIP:

27502

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!

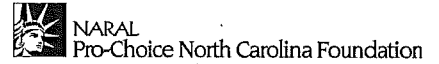
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Name Stephanie Vogel
E-mail address Stephanie.Lynn.Vogel@gmail.com
ZIP Code 27604

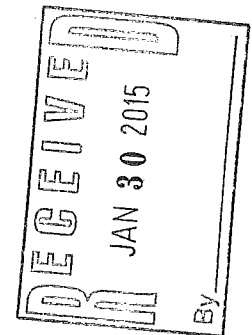
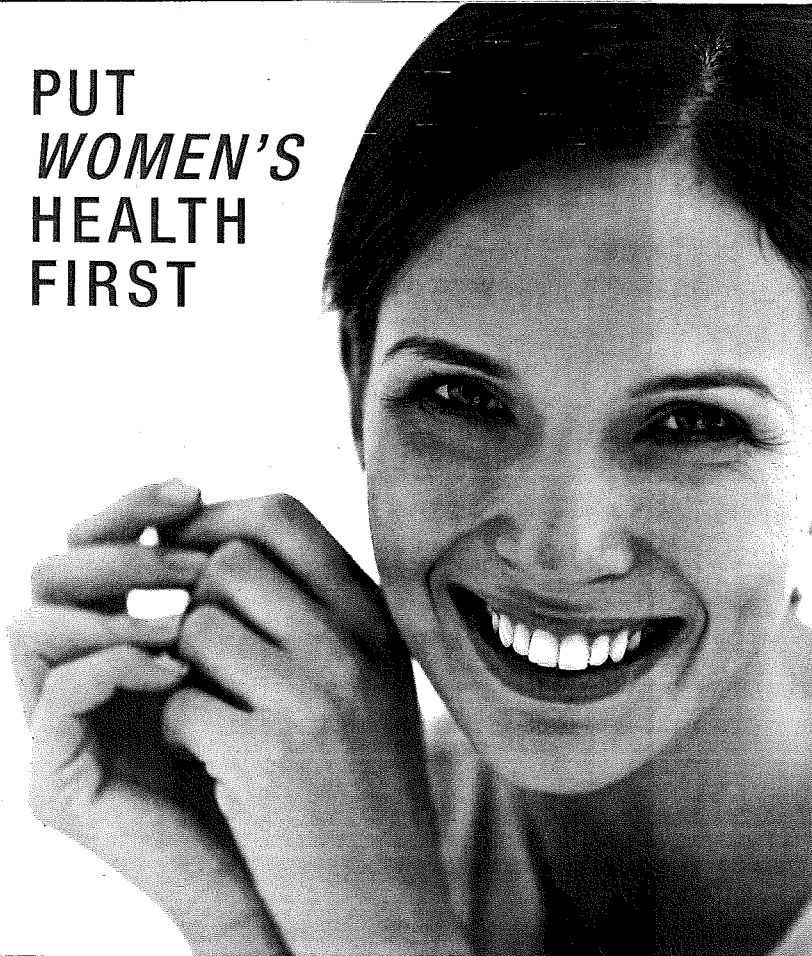
Additional Comments:

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Planned Parenthood Action Fund of North Carolina

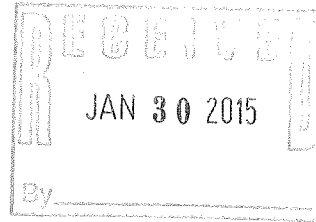
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HEALTH
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Nadine Pfeiffer
Division of Health Service Regulation
2701 Mail Service Center
Raleigh, NC 27699-2701



Planned Parenthood Health Systems
Action Fund, Inc.



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FIRST NAME:

Wiktor

LAST NAME:

Vond

EMAIL:

keifont91@gmail.com

ZIP:

28079

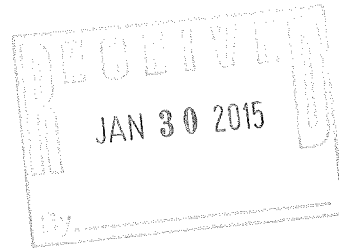
Optional Comment field:

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FIRST NAME:

Brian

LAST NAME:

VN

EMAIL:

ZIP:

28804

Optional Comment field:

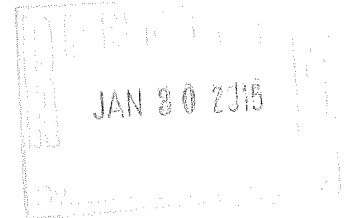
BV

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FIRST NAME:

LAST NAME:

ROBERTA

WADDLE

EMAIL:

ZIP:

RWADDLE@NC.RR.COM

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

Name So Ellen Wade
E-mail address caroljo@mcn.ncu.edu
ZIP Code 28715
Additional Comments:


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



Name So Ellen Wade
E-mail address caroljo@mcn.ncu.edu
ZIP Code 28715

Additional Comments:

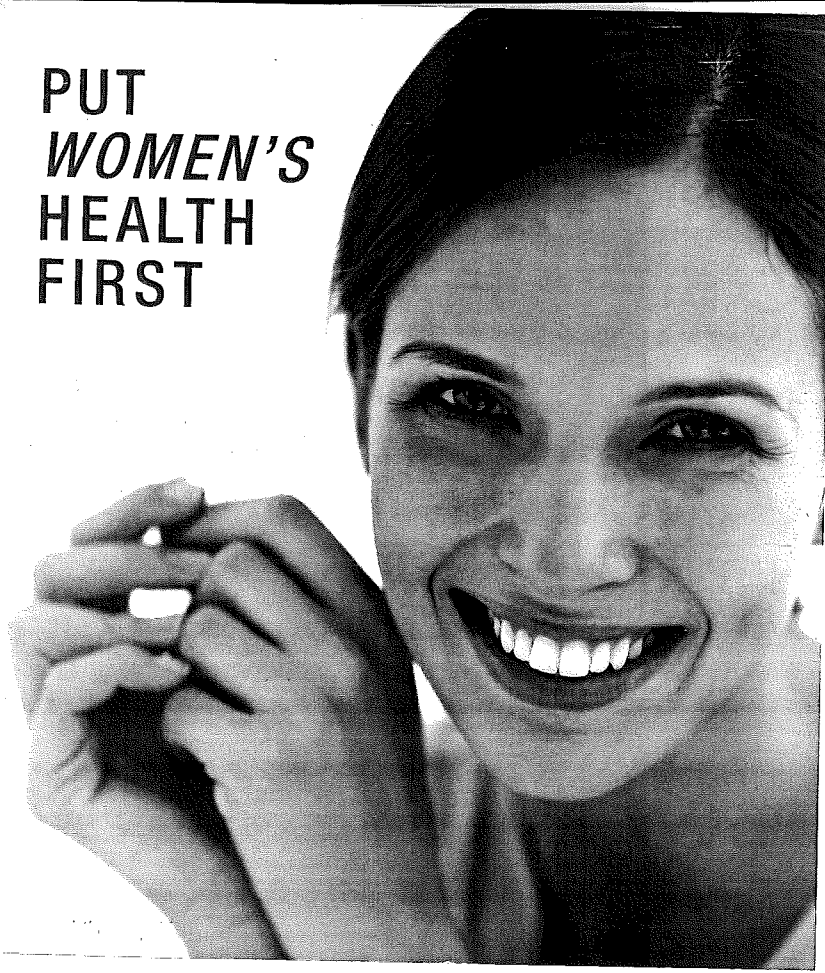
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FIRST**



RECEIVED
JAN 30 2015
By _____

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

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Name Skyl Wegner
E-mail address Swagner.188w@gmail.com
ZIP Code 27713

Additional Comments:

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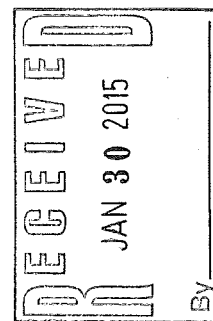
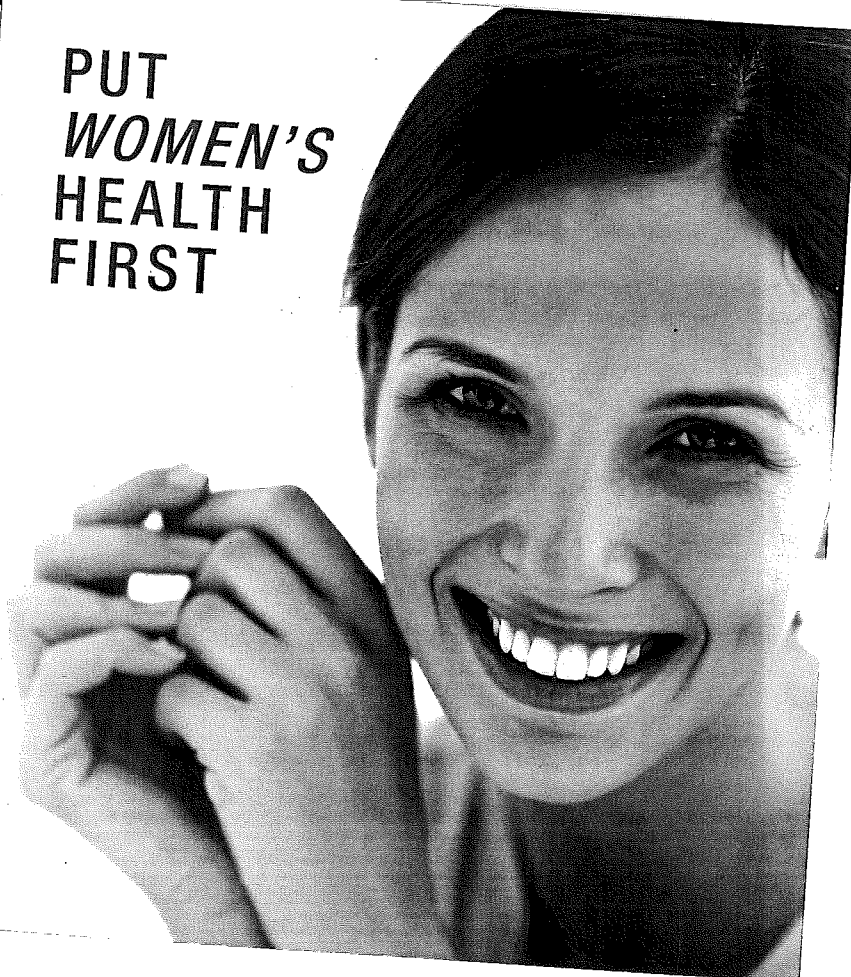


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Name Theresa L. Walker
E-mail address twalker26@bmcncos.uncfs.edu
ZIP Code 28304

Additional Comments:

*It's my body,
not yours!*

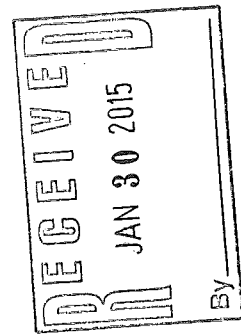
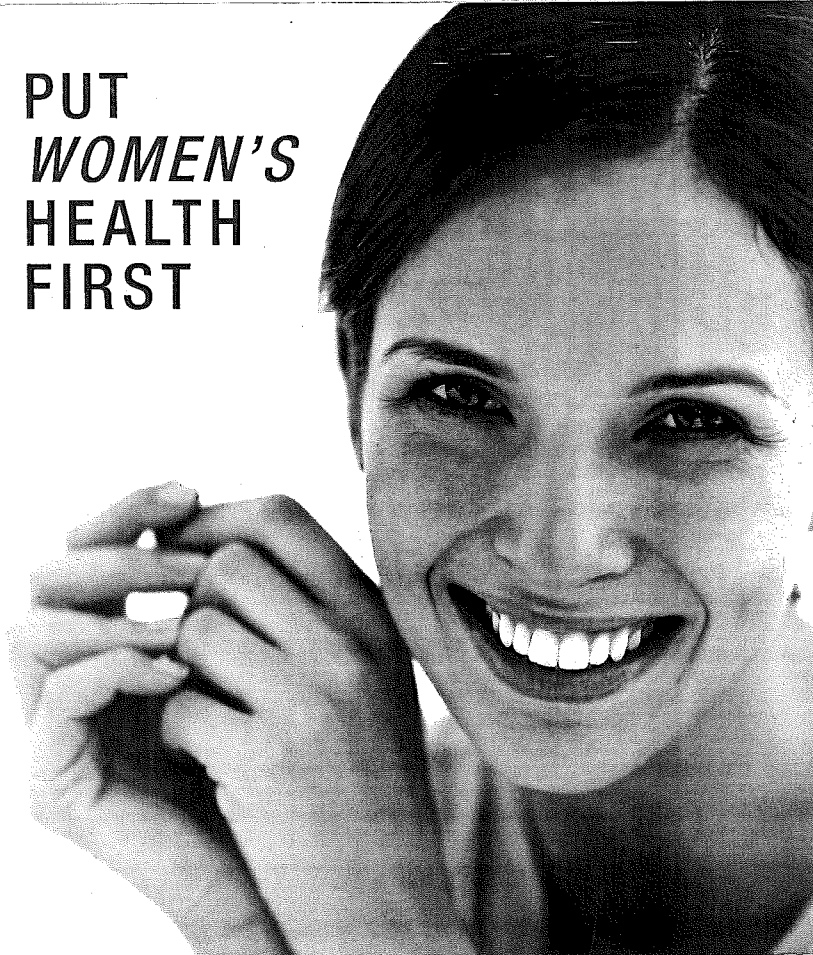
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Name Barry Walker
E-mail address watsonwalker@msn.com
ZIP Code 28704

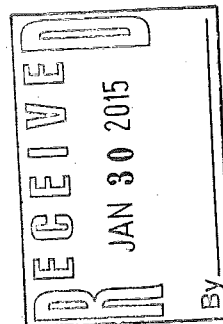
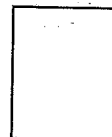
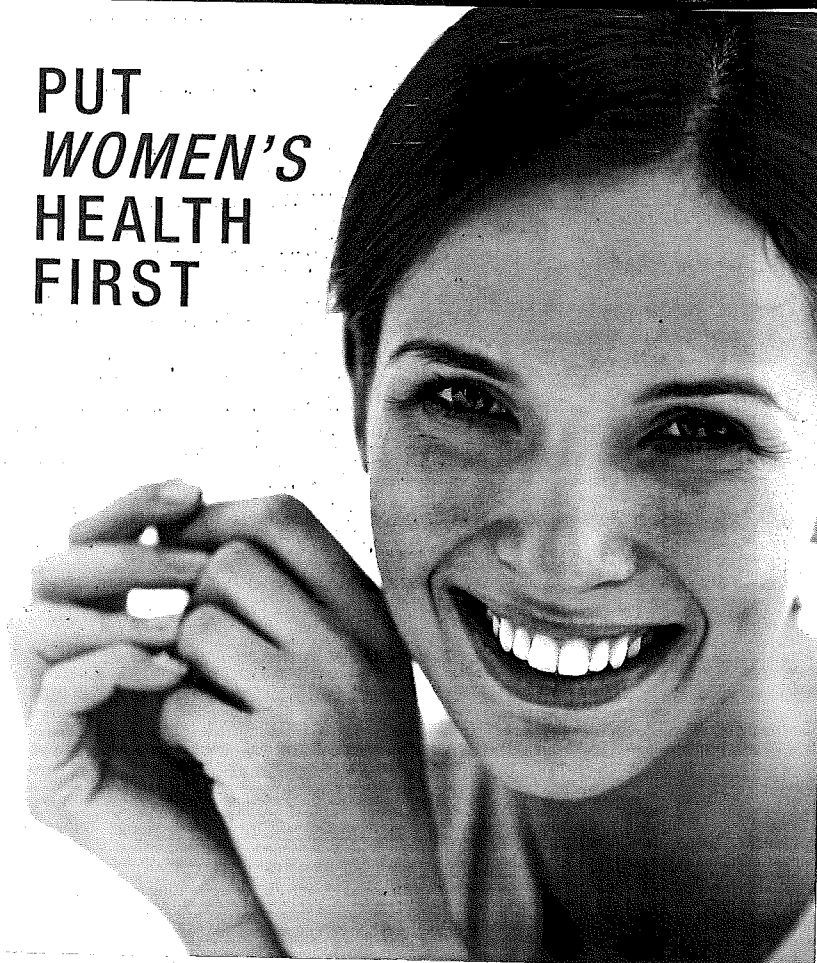
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Name Yvonne Walker

E-mail address YWA

ZIP Code 28806

Additional Comments:

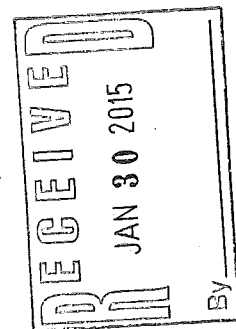
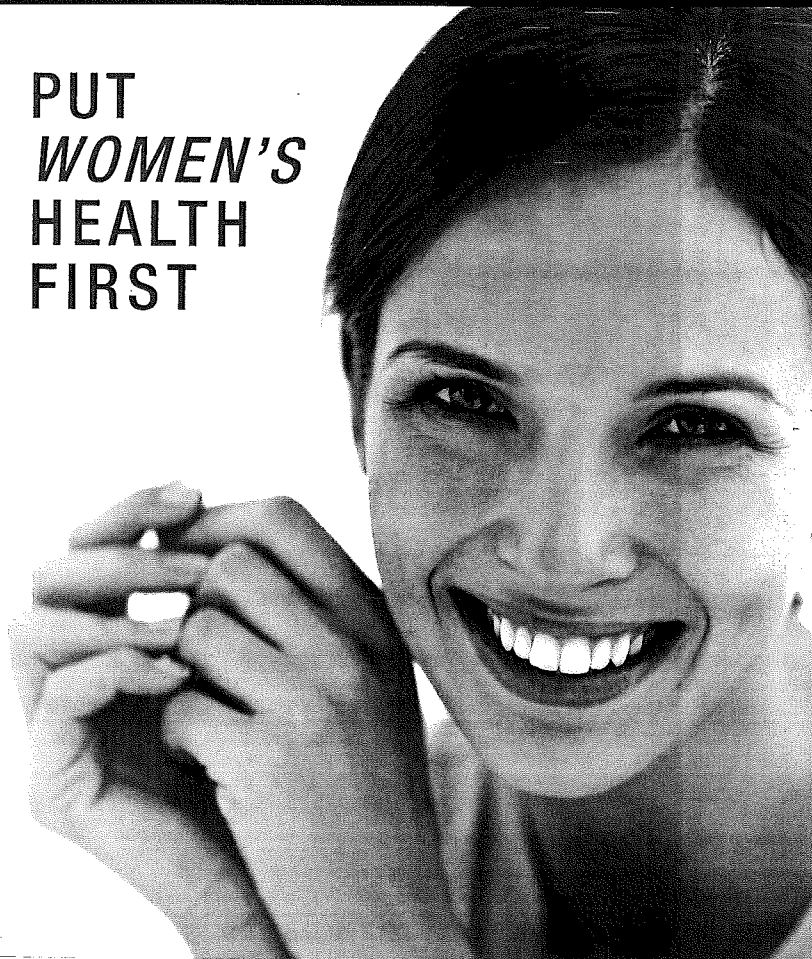
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Name Elizabeth Walker
E-mail address lwalker1@unca.edu
ZIP Code 28802

Additional Comments:

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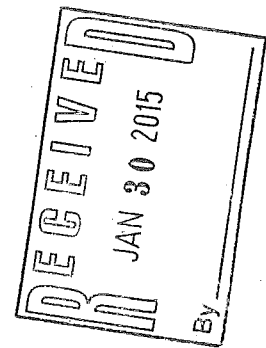
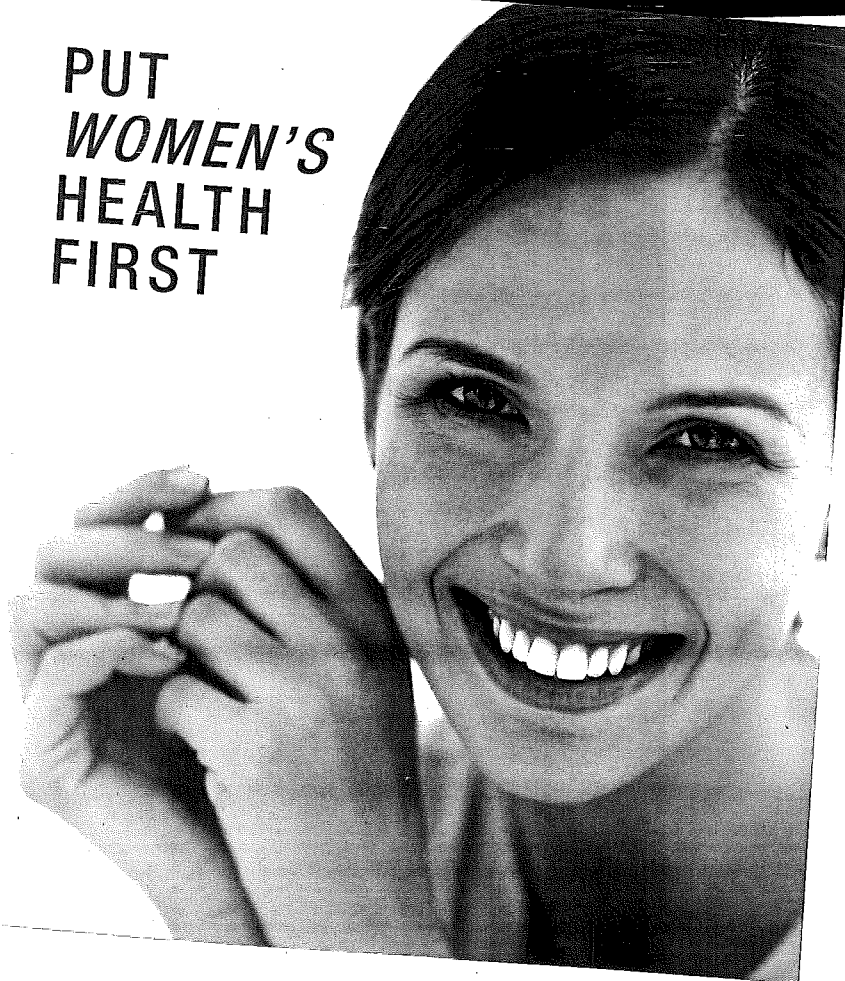


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Pro-Choice North Carolina Foundation



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Name Felicia L. Walker
E-mail address Walkerf37@yahoo.com
ZIP Code 28340

Additional Comments:

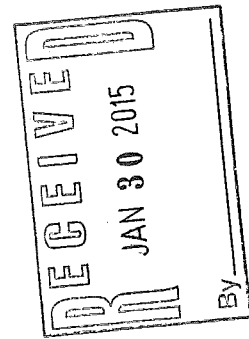
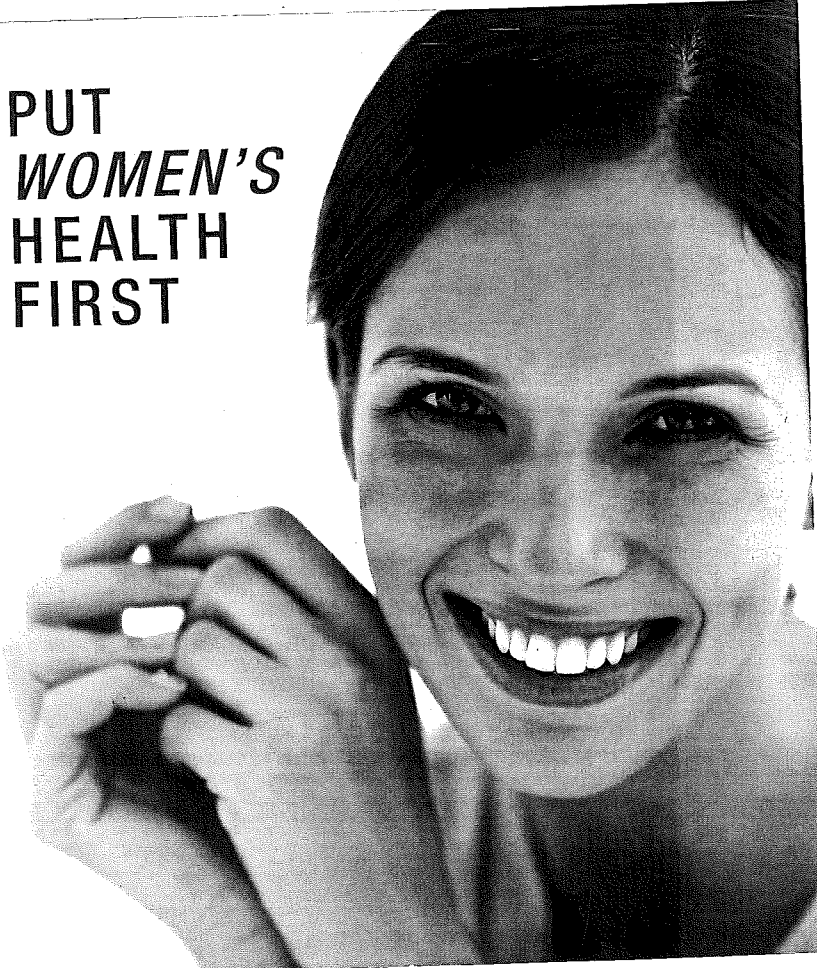
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Name Tiara Walker
E-mail address TWalker20@hotmail.com
ZIP Code 28314

Additional Comments:
890 Crescent Commons Way
Apt 201
Fayetteville, NC 28314

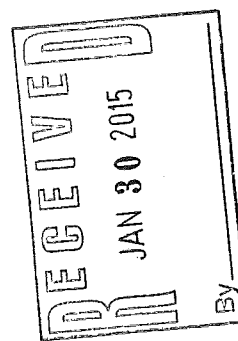
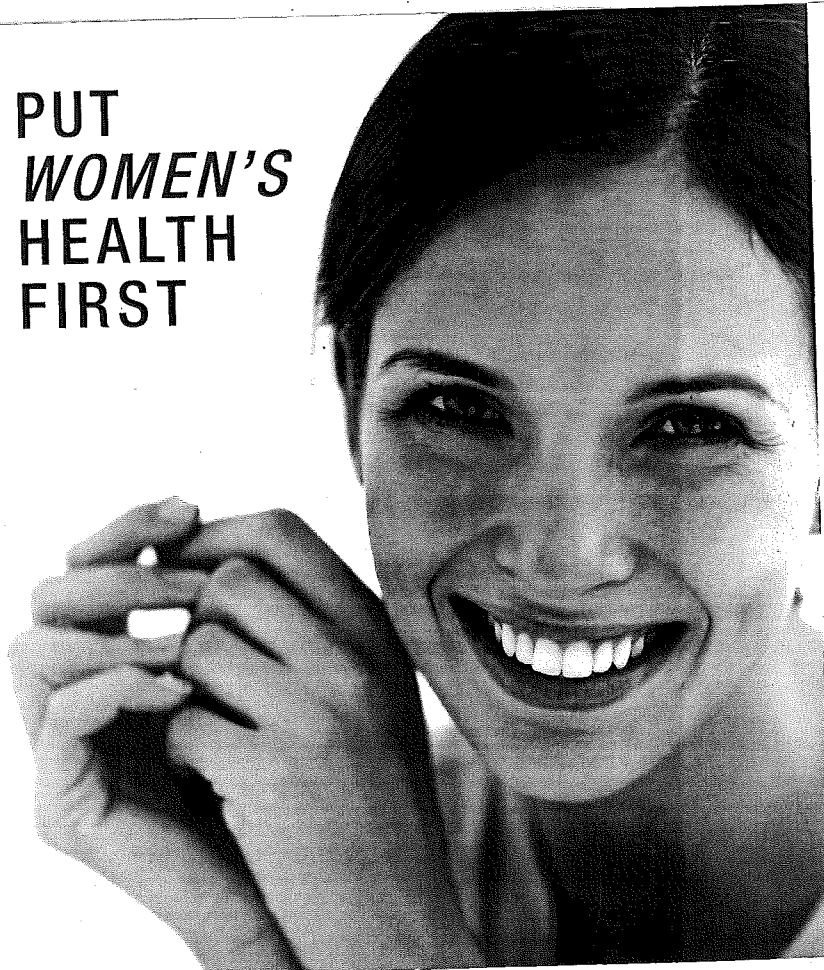
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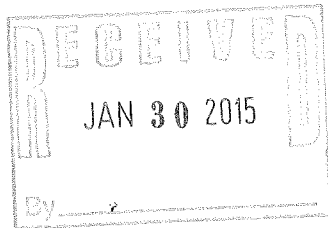
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Action Fund, Inc.

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FIRST NAME:

LAST NAME:

TERRY

WALL

EMAIL:

ZIP:

terry.c.wall@gmail.com

27605

Optional Comment field:

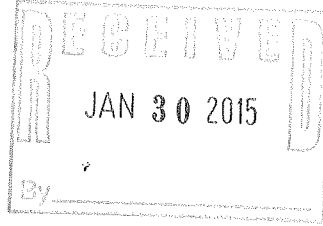
Many health centers offering surgical procedures for abortion ALSO provide essential basic health care for women. TRAP laws interfere with the goal of better health for ALL. Put women's health first. Let's improve women's health in our state.

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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Action Fund, Inc.



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FIRST NAME:

John

LAST NAME:

WALL

EMAIL:

johnwall@nesu.edu

ZIP:

27605

Optional Comment field:

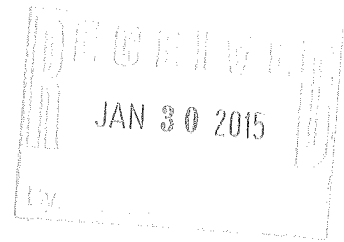
These efforts ^{of the DHHS} are ~~the~~ ^{very} mean, and are beneath the dignity of adult human beings.

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:

~~_____~~ Terry

LAST NAME:

Wall

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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

TAKE ACTION!

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Name Lynne Walter, MSW
E-mail address lynnewalter@hotmail.com
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Additional Comments:

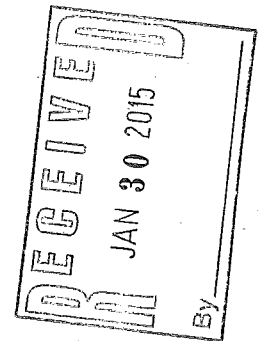
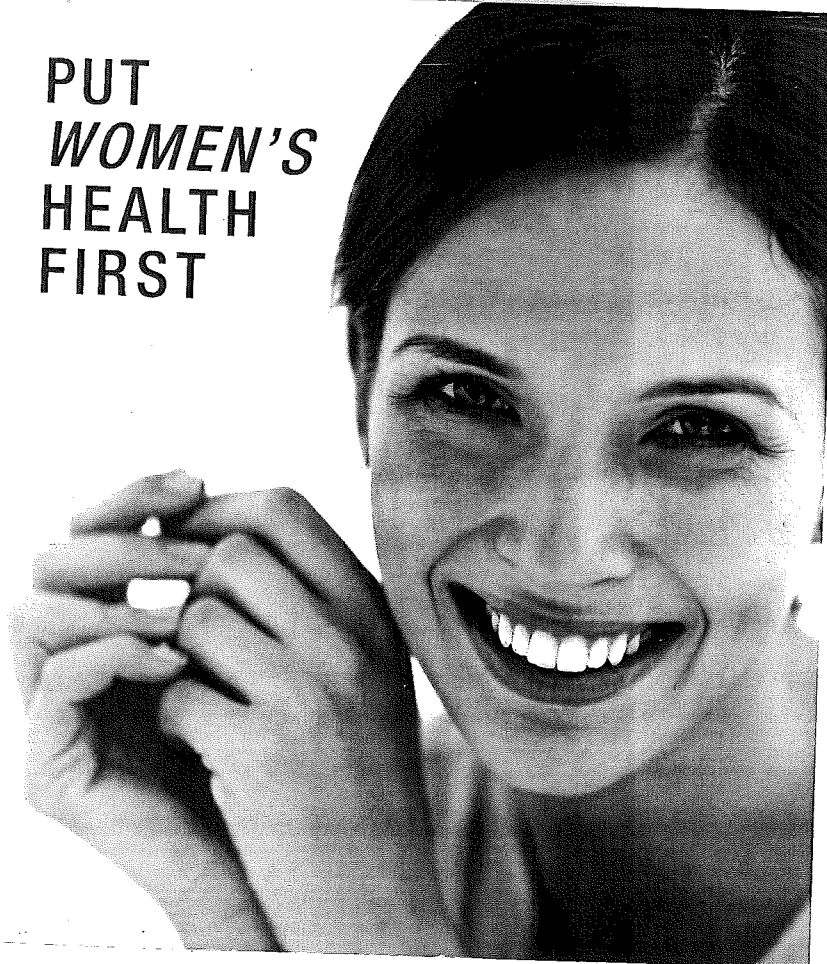
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FIRST when considering any
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Yes, I would like to receive updates from organizations supporting this comment:



Planned Parenthood Action Fund of North Carolina

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

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Name Graymon Ward
E-mail address graymonw@gmail.com
ZIP Code 27605

Additional Comments:

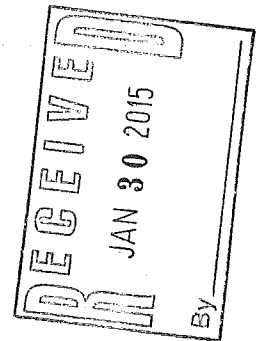
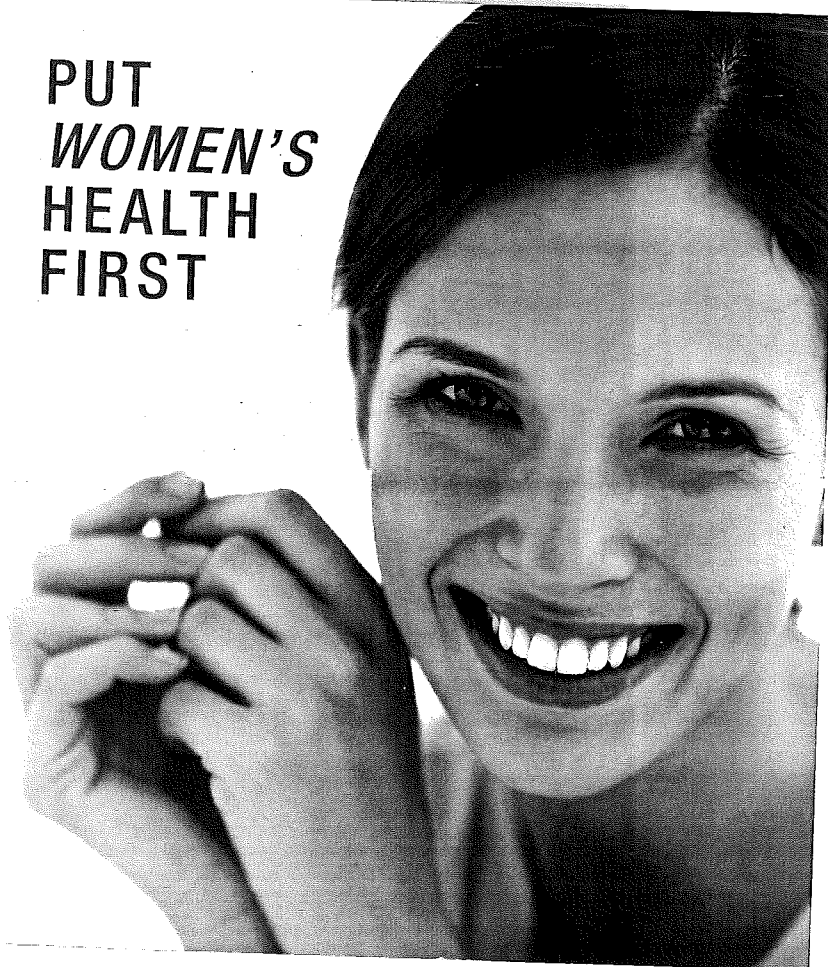
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 NARAL
Pro-Choice North Carolina Foundation

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

Planned Parenthood Action Fund of North Carolina

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Name Lydia Ward
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ZIP Code 28804

Additional Comments:

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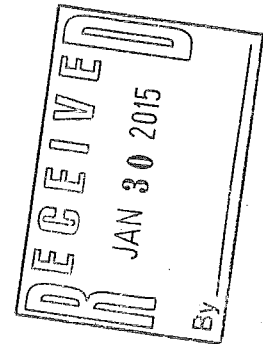
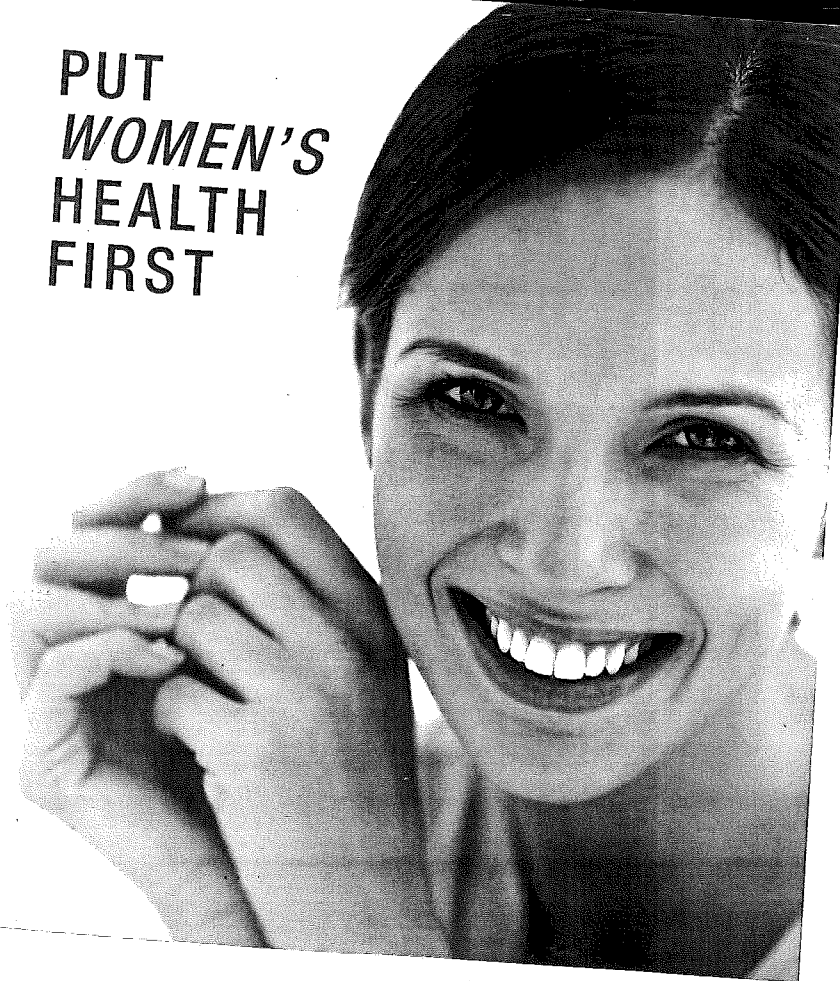


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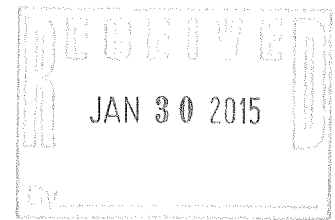


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FIRST NAME:

LAST NAME:

Cartland

Warfield

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Cartland.Warfield@ppsat.org

Optional Comment field:

I urge anyone who can to help and support the action to protect women's health & safety. Without organizations like Planned Parenthood so many women would be left without proper care & without 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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E-mail address Bradwarfield@gmail.com
ZIP Code 28751

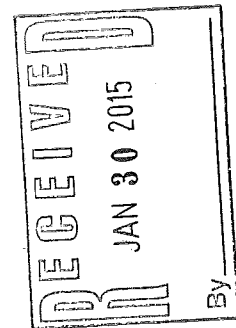
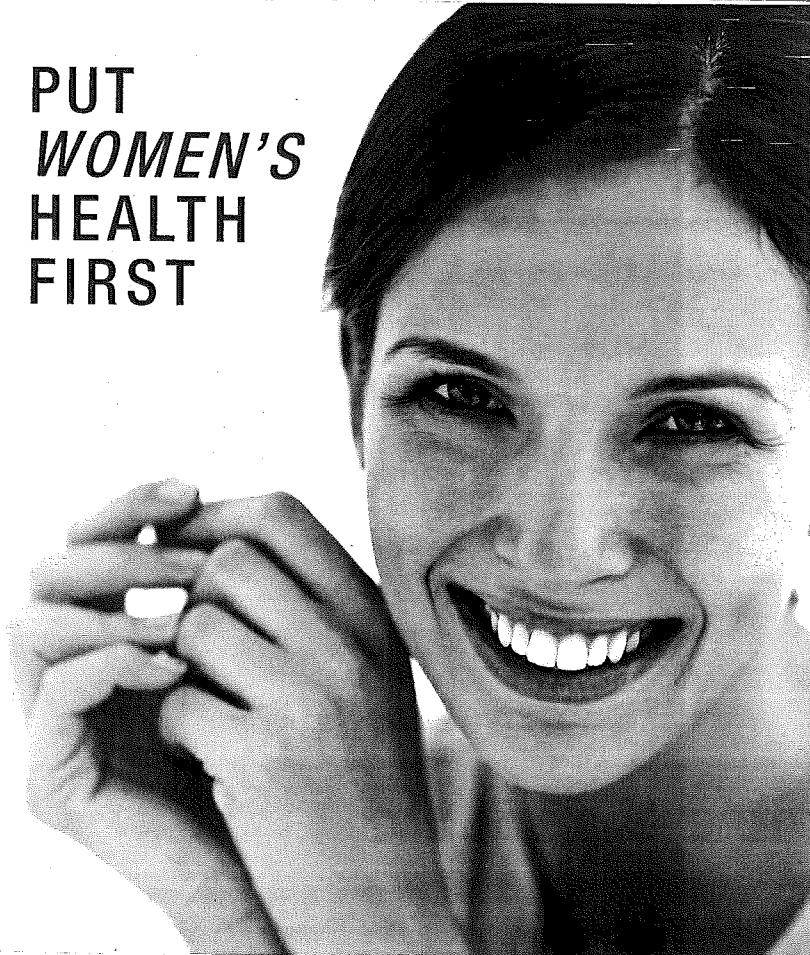
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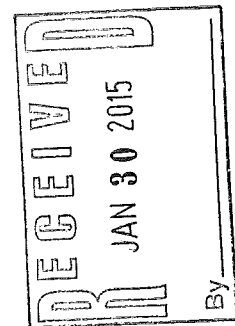
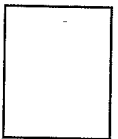
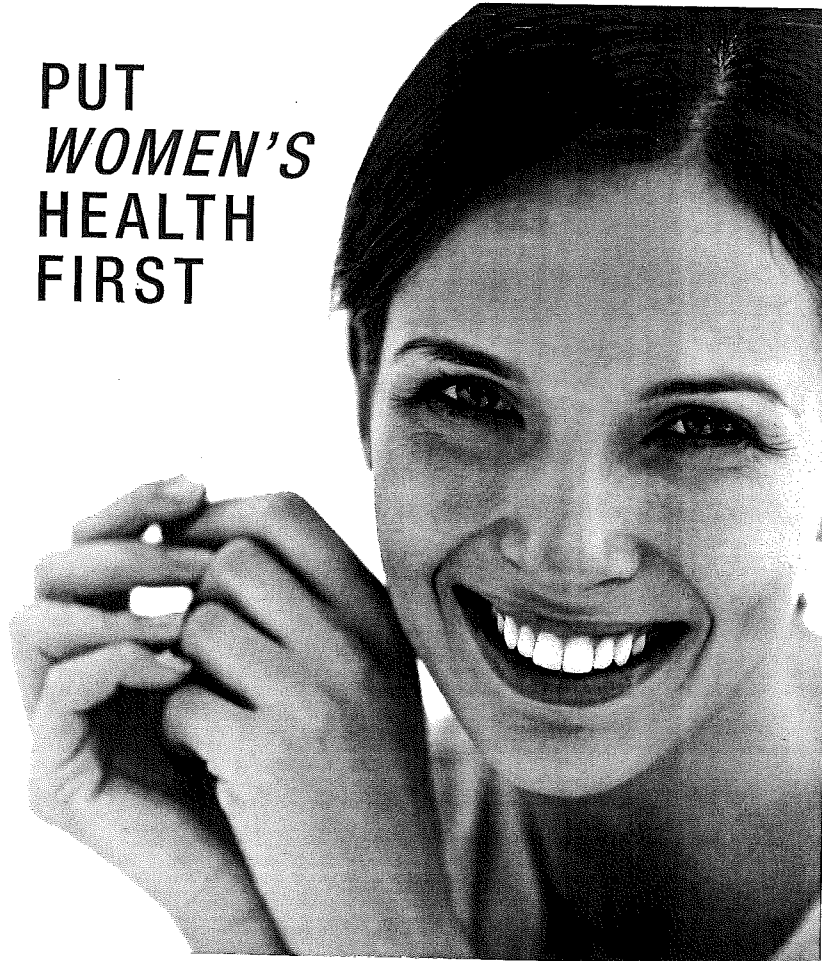
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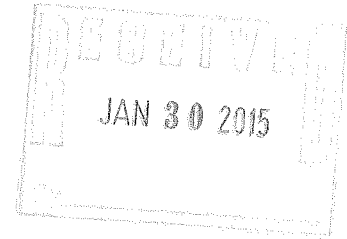
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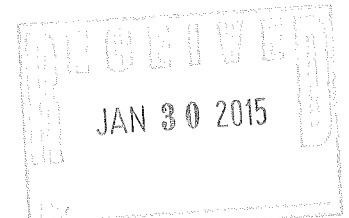
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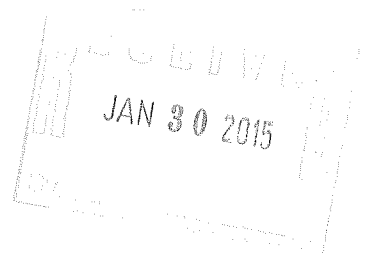
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FIRST NAME:

LAST NAME:

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28311

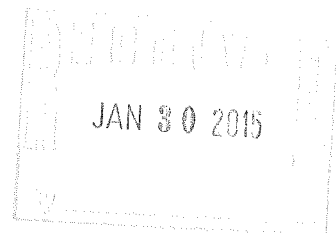
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FIRST NAME:

Sabrina

LAST NAME:

Washington

EMAIL:

Washina@gmail.com

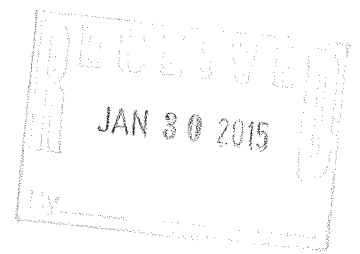
ZIP:

28311

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:

Charles

LAST NAME:

Washington

EMAIL:

washingtoncharlesj82@

ZIP:

28311

Optional Comment field:

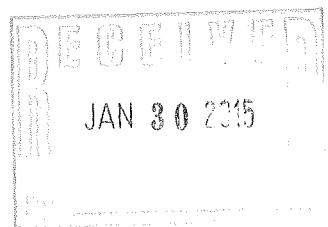
yahoo.com

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FIRST NAME:

LAST NAME:

Hollie

Wasilewski

EMAIL:

ZIP: 27863

Holliewasilewski@ncere

Optional Comment field:

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Name LYNDA L. WATERMAN
E-mail address LYNDAWATERMAN@gmail.com
ZIP Code 27573

Additional Comments:

Women need
choices.

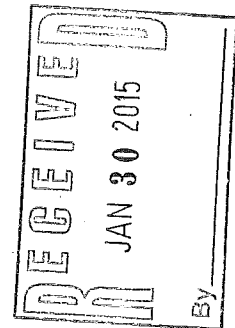
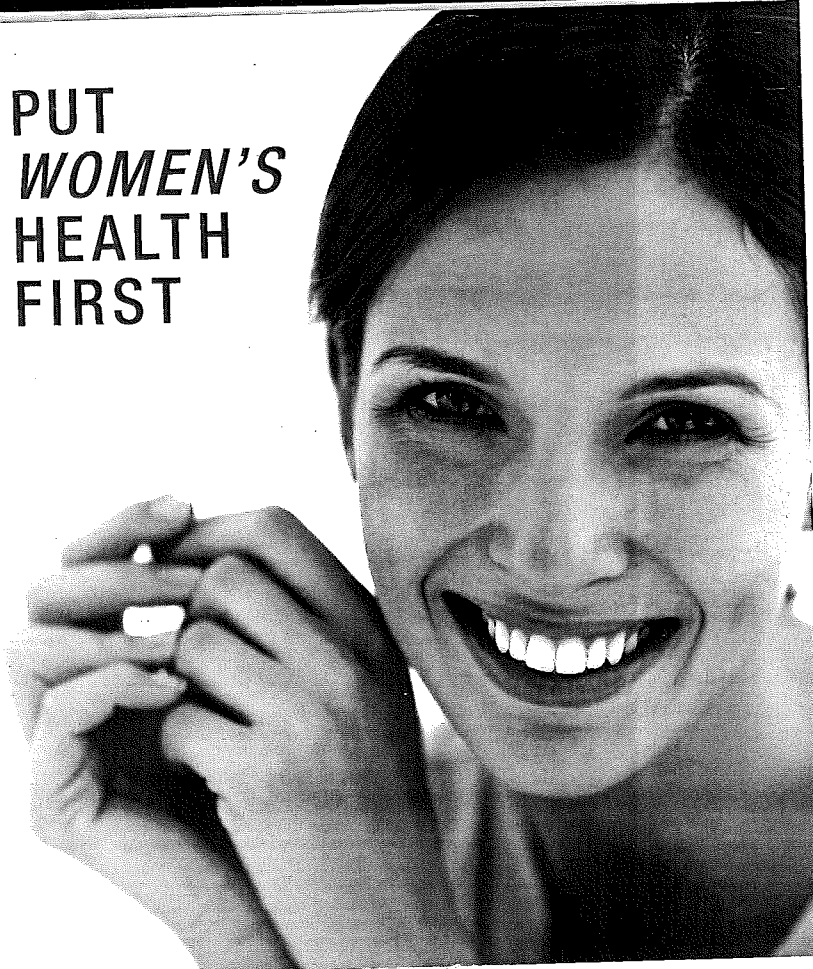
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 NARAL
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Parenthood***
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Planned Parenthood Action Fund of North Carolina

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

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Name Emily Waters
E-mail address emilywaters@me.com
ZIP Code 27510

Additional Comments:

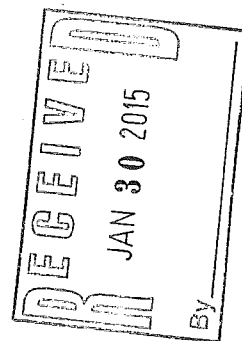
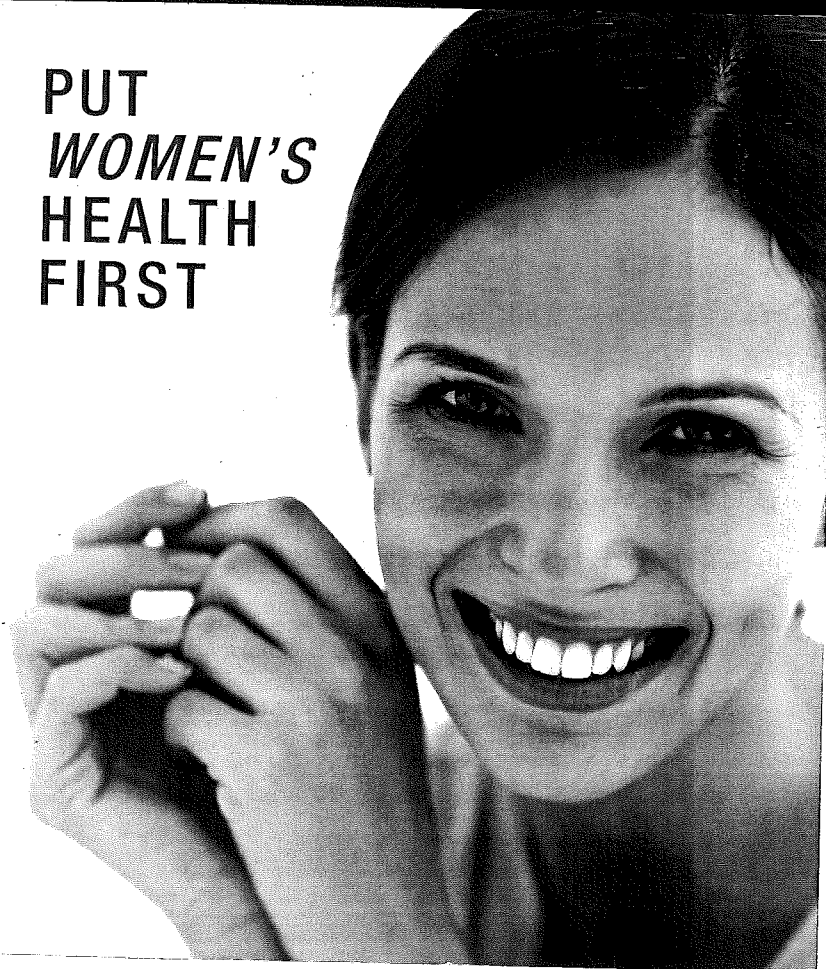
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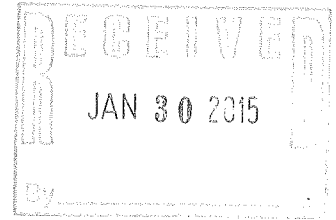
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FIRST NAME:

LAST NAME:

Lynn

Watkins

EMAIL:

ZIP:

lwatkinsncegma@com

27103

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 Megan Watson

E-mail address _____

ZIP Code 27804

Additional Comments:

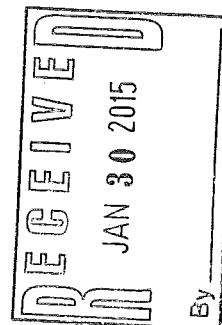
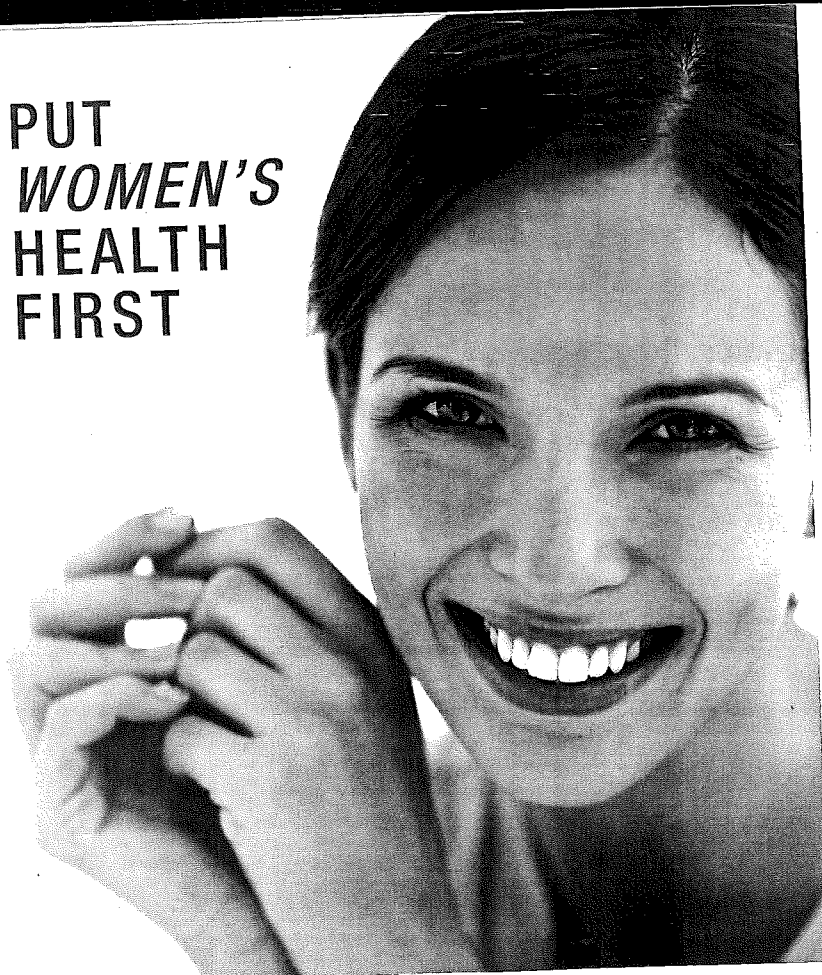
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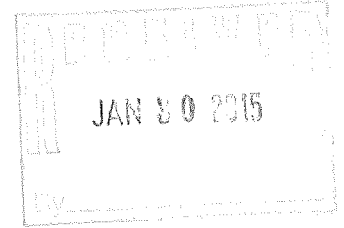
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FIRST NAME:

Sarah

LAST NAME:

Watson

EMAIL:

swatson@uncc.edu

ZIP:

28025

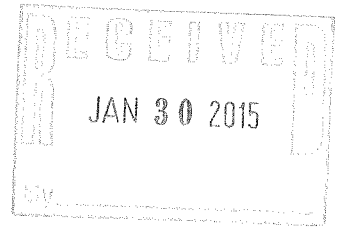
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FIRST NAME:

LAST NAME:

George Watson

EMAIL:

ZIP:

afwatson@mindspring 30152

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Name Lizzie Weant Smith
E-mail address lizz1017@gmail.com
ZIP Code 27610

Additional Comments:

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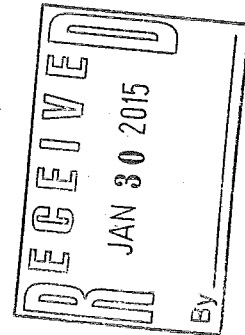
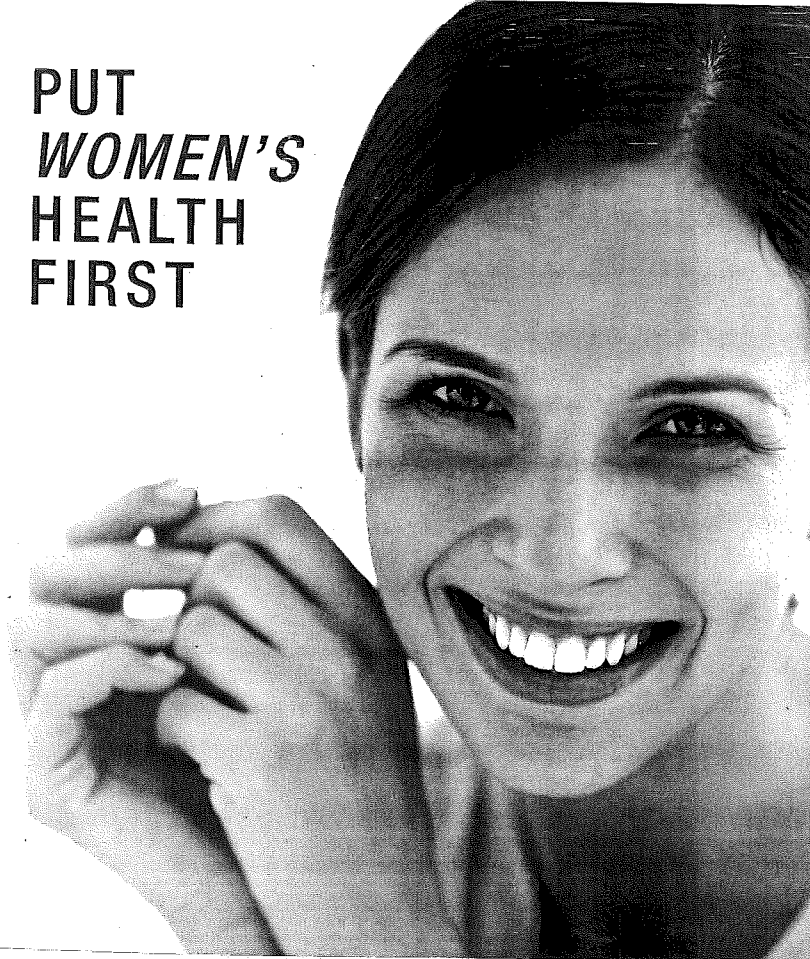


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Nadine Pfeiffer
Division of Health Service Regulation
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Raleigh, NC 27699-2701

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Name Christine Weatherly
E-mail address bpink10@aol.com
ZIP Code 28301

Additional Comments:

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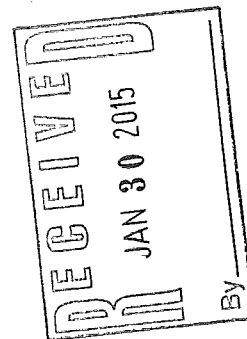
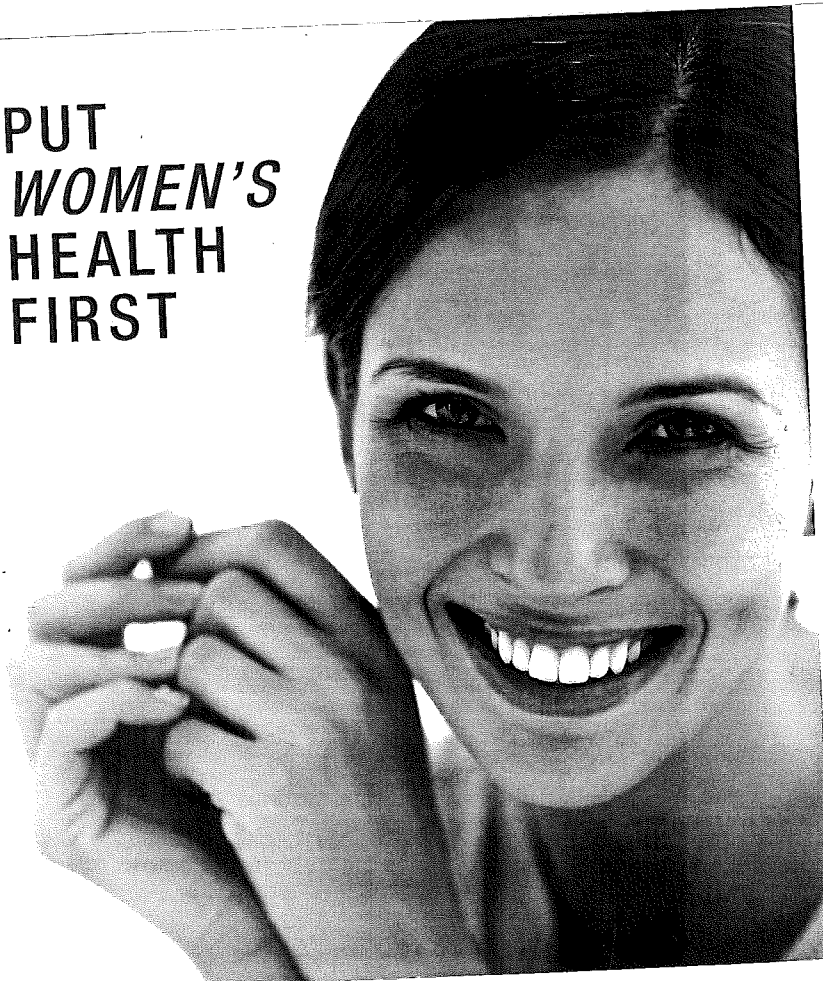


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Name Victoria Weatherly
E-mail address victoriaweatherly87@gmail.com
ZIP Code 28348

Additional Comments:

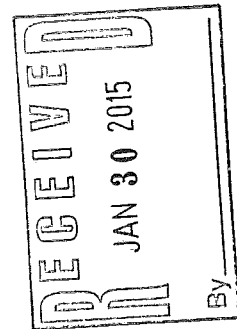
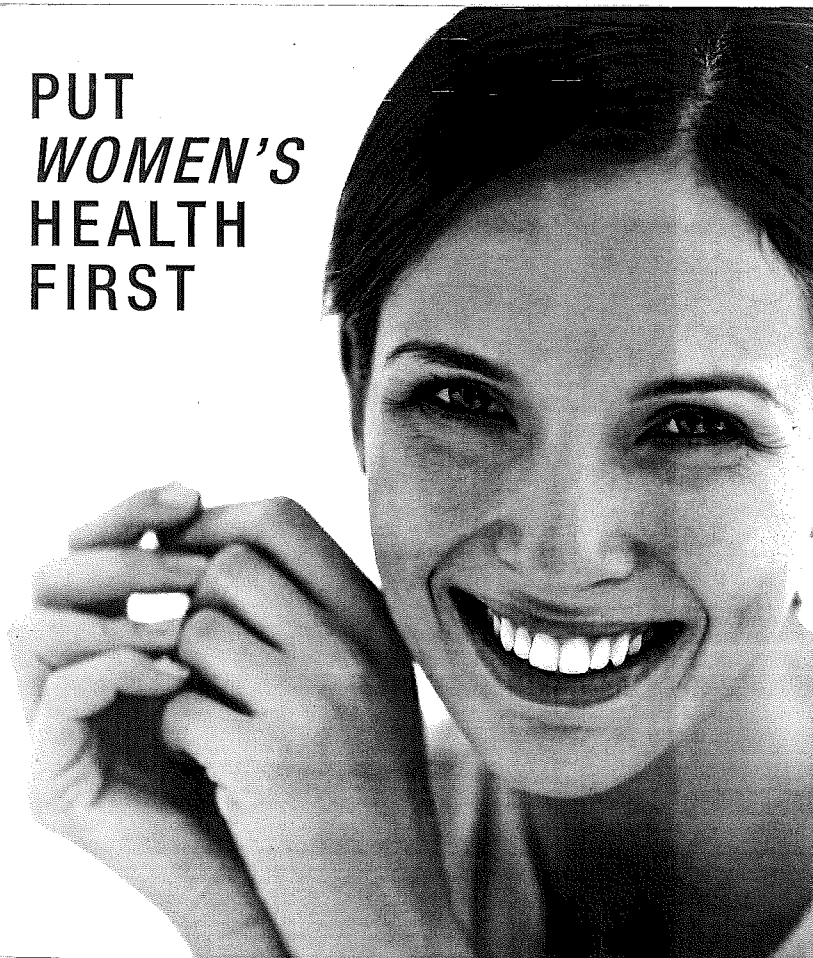
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Name Dr. Wendee Weeksby
E-mail address wendee0521@gmail.com
ZIP Code 27615

Additional Comments:

I have served on the
PP Board & very
concerned re draft
NC is going!

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Name Alison Weiner
E-mail address bubbealison1@earthlink.net
ZIP Code 27510

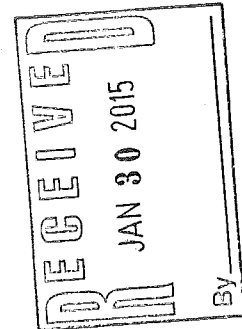
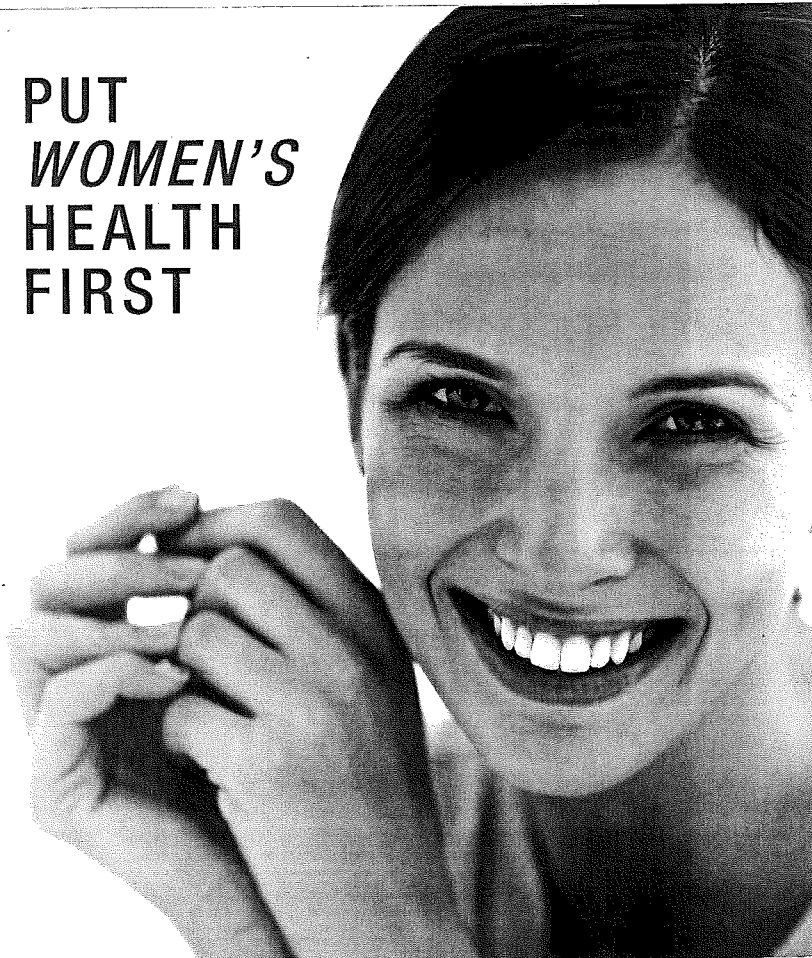
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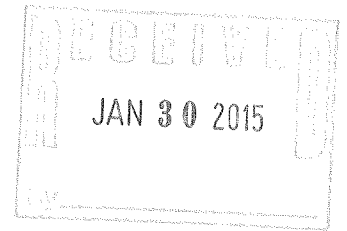
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FIRST NAME:

LAST NAME:

Jamaria

Welch

EMAIL:

ZIP:

27617

Optional Comment field:

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Name Lila Welsh

E-mail address lwelsh@unca.edu

ZIP Code 28804

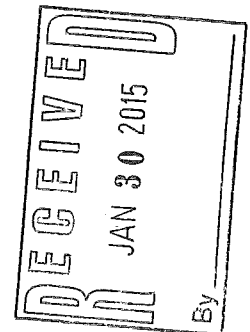
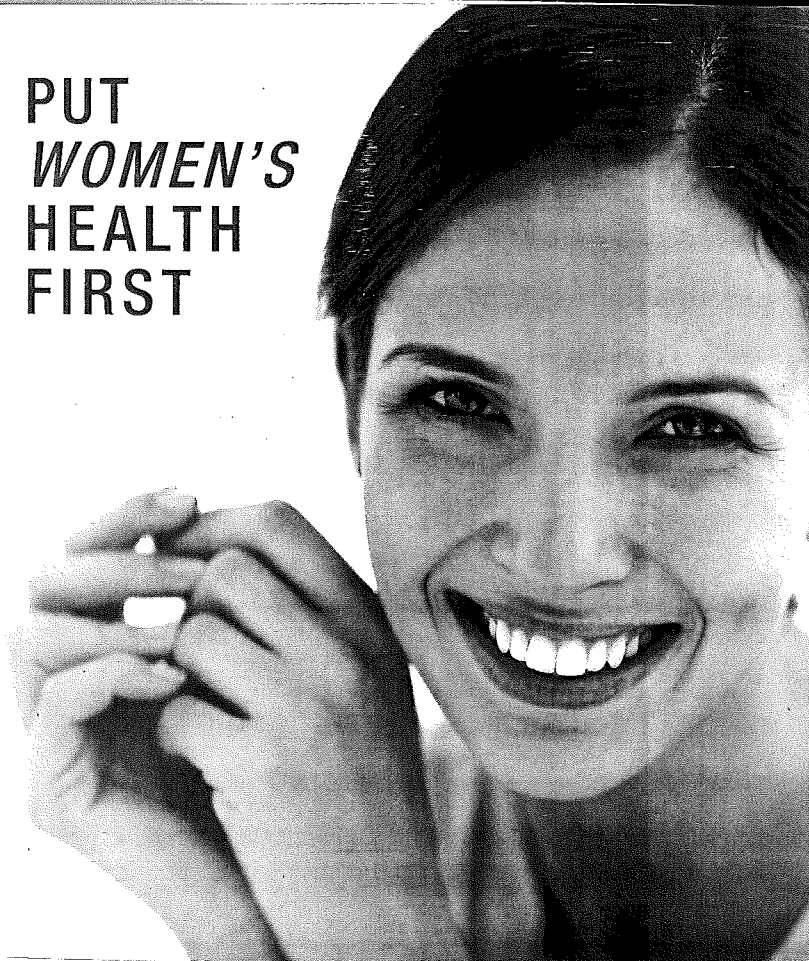
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Name Charles West

E-mail address chazwes@hotmail.com

ZIP Code 27613

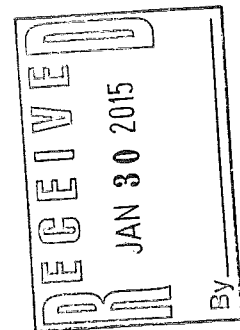
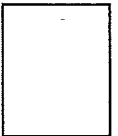
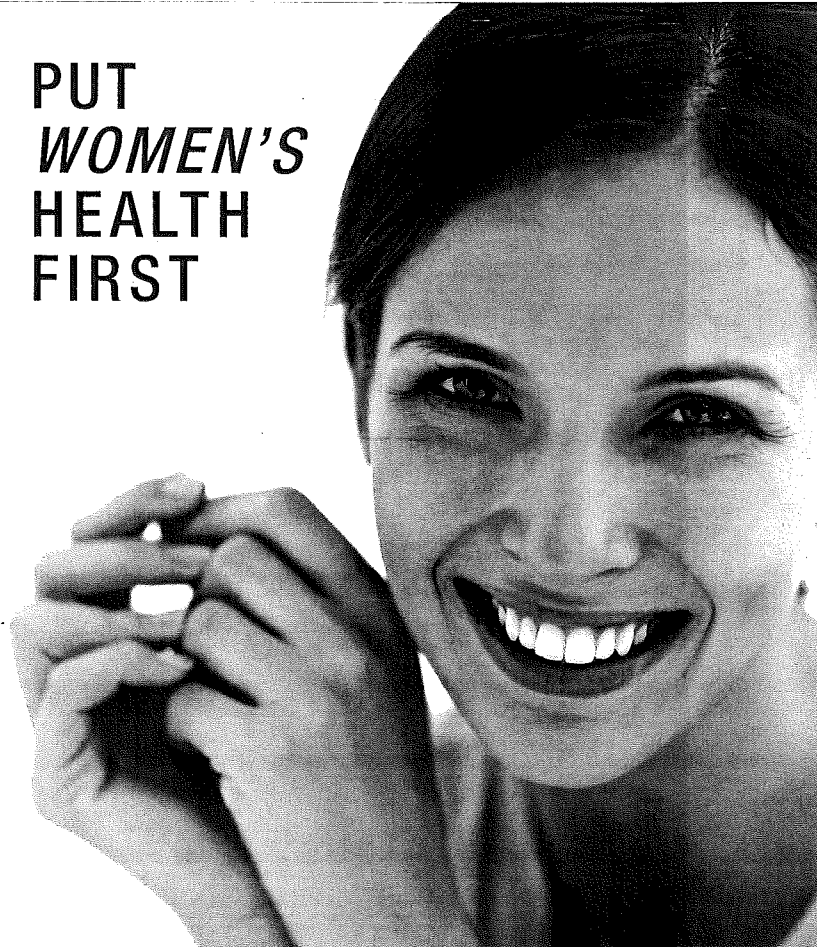
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FIRST



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 Rebecca West

E-mail address raowlb23@me.com

ZIP Code 27609

Additional Comments:

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

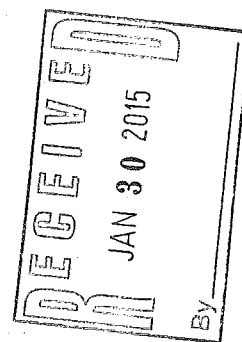
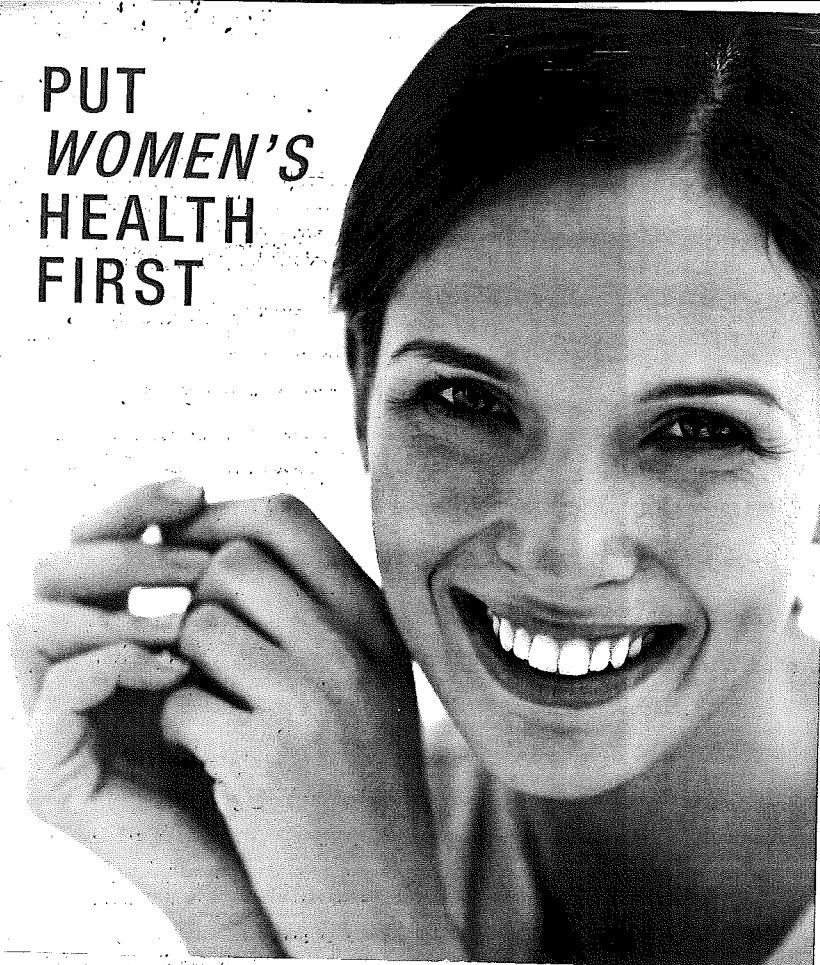


NARAL
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

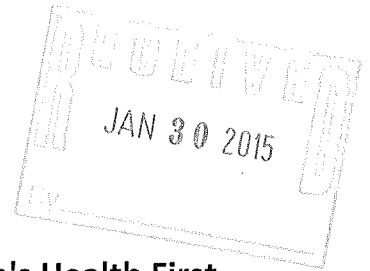
PUT
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Planned Parenthood Health Systems
Action Fund, Inc.



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FIRST NAME:

LAST NAME:

Lucas

Westfall

EMAIL:

ZIP:

lucas.westfall@yahoo.com

32501

Optional Comment field:

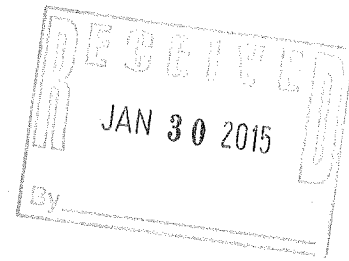
lw

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:

Dick

Weston-Jones

EMAIL:

ZIP:

27514

Optional Comment field:

Legislature should stay out of women's lives and leave it to their doctors.

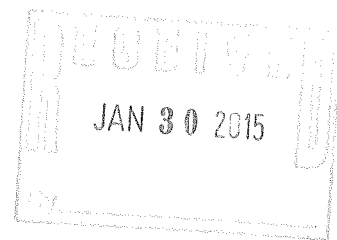
They need to stop making women's choices

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

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FIRST NAME:

Charles

LAST NAME:

Whalen

EMAIL:

gnarwhale88@yahoo.com

ZIP:

28801

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 Bebekah Whilden
E-mail address RFW903@gmail.com
ZIP Code 28801

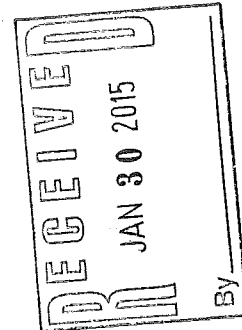
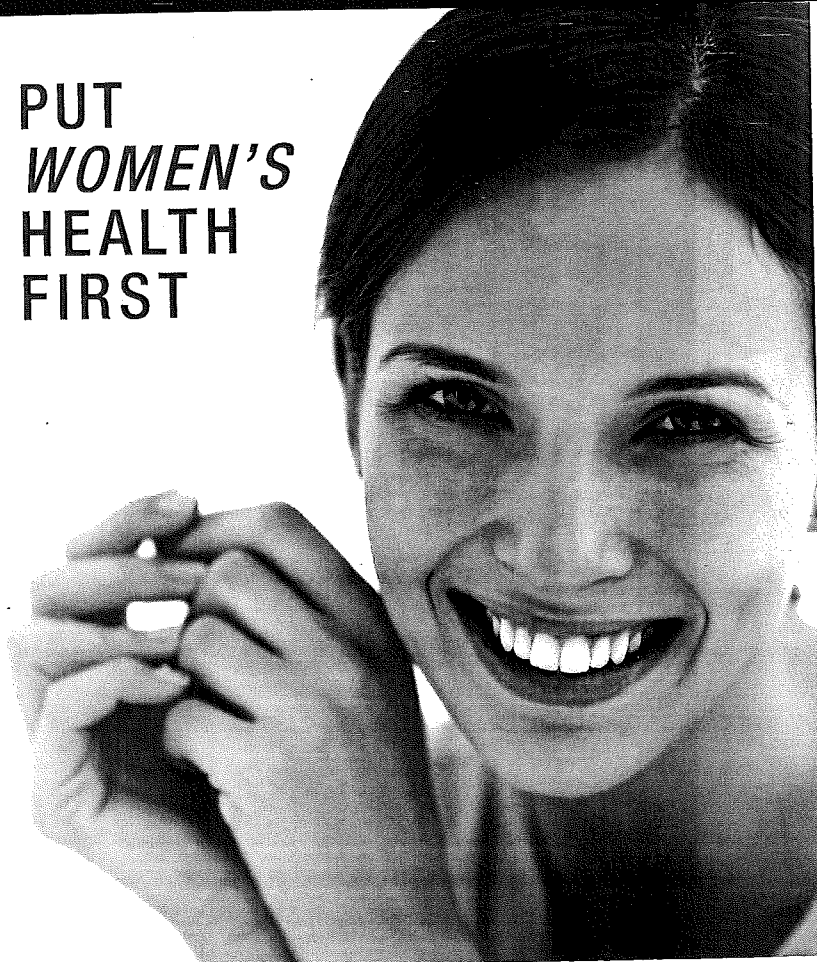
Additional Comments:

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



Planned Parenthood Action Fund of North Carolina

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Name Andrew White
E-mail address awhite21@unca.edu
ZIP Code 28803

Additional Comments:

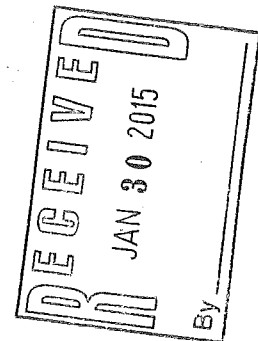
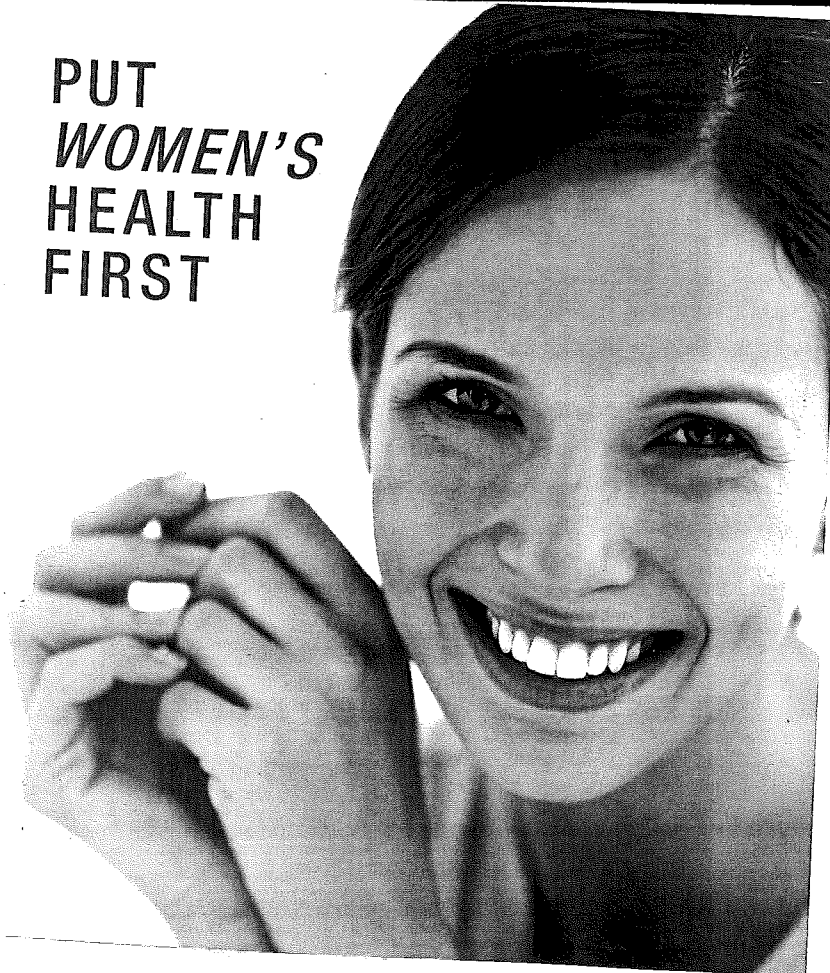
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Parenthood**
Act. No matter what.

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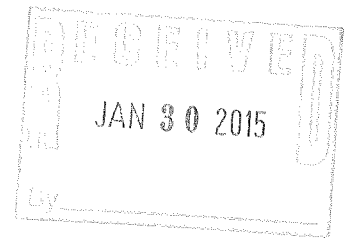
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FIRST NAME:

ADAM

LAST NAME:

WHITE

EMAIL:

ADAMWHITE@AIMHIGHER.COM

ZIP:

28803

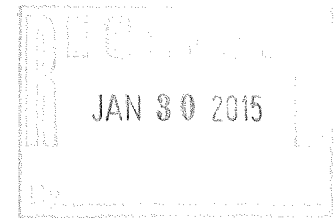
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FIRST NAME:

Marasri

LAST NAME:

White

EMAIL:

Marasri.white@yahoo.com

ZIP:

28314

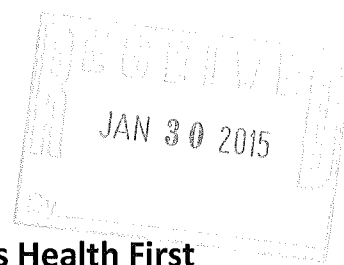
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FIRST NAME:

Jennifer

LAST NAME:

Whiteside

EMAIL:

ZIP:

27606

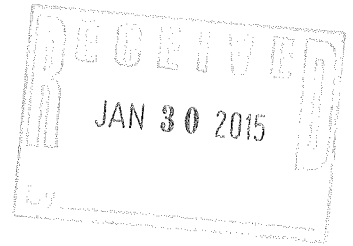
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FIRST NAME:

Maggie

LAST NAME:

Whitman

EMAIL:

mabyrd@gmail.com

ZIP:

28712

Optional Comment field:

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Name Coleman Whittier
E-mail address cocowhittier@mac.com
ZIP Code 27278

Additional Comments:

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



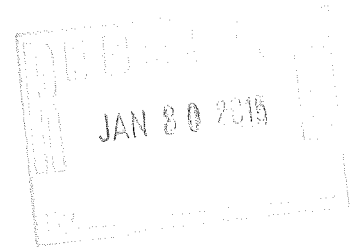
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FIRST NAME:

LAST NAME:

Krista

Michelle Whittington

EMAIL:

ZIP:

dc152carolina@gmail

27591

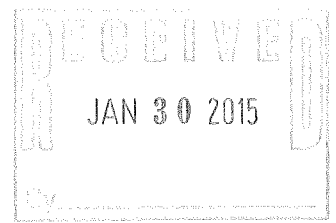
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FIRST NAME:

Justin

LAST NAME:

Whittington

EMAIL:

magarthebarbarian@yahoo.com

ZIP:

27713

Optional Comment field:

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Name Kathy Widenhouse

E-mail address Kwidenhouse@gmail.com

ZIP Code 27612

Additional Comments:

Freedom of
Choice makes
Healthy Families

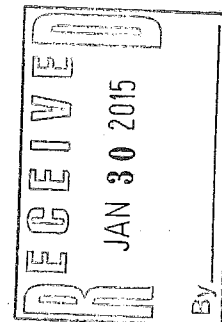
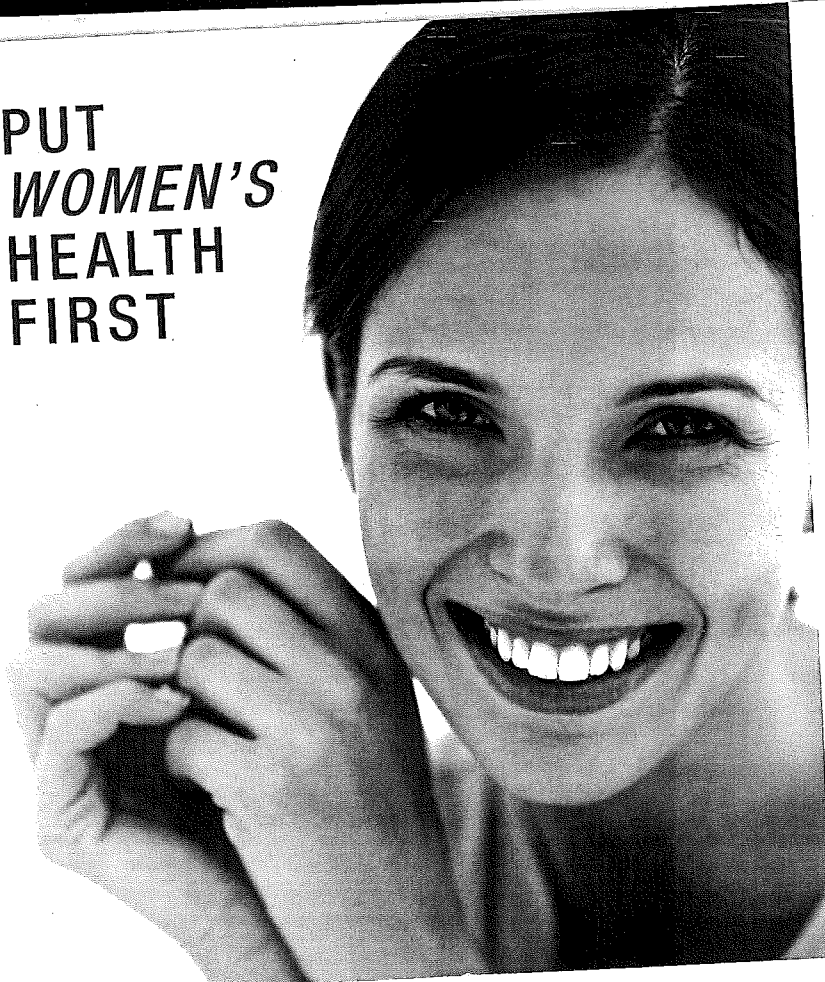
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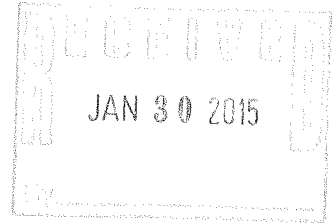
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FIRST NAME:

LAST NAME:

Hoel Wiegner

EMAIL:

ZIP:

hoel.wiegner@yahoo.com 27601

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Name Madeline Wiggins
E-mail address madeline.wiggins@unc.edu
ZIP Code 28804

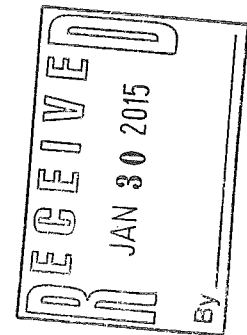
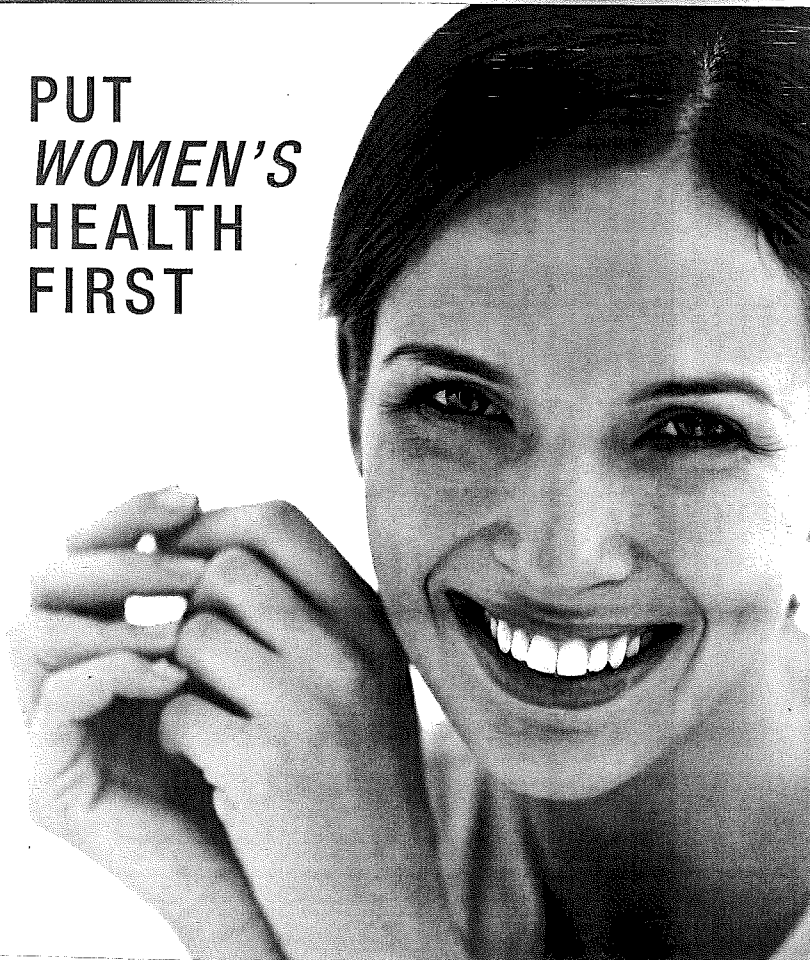
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Name MRS. MERYWEN WIGLE


E-mail address wennywigley@hotmail

ZIP Code 27707

Additional Comments:

Thank you for the
important work you
do.

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

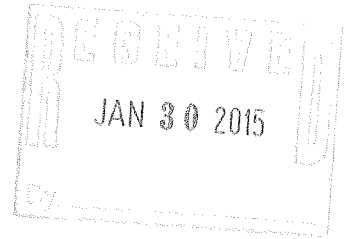
 NARAL
Pro-Choice North Carolina Foundation

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Parenthood**
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Planned Parenthood Action Fund of North Carolina



Planned Parenthood Health Systems
Action Fund, Inc.



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FIRST NAME:

Rachel

LAST NAME:

Wilde

EMAIL:

ZIP:

77601

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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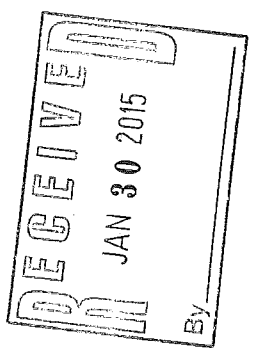
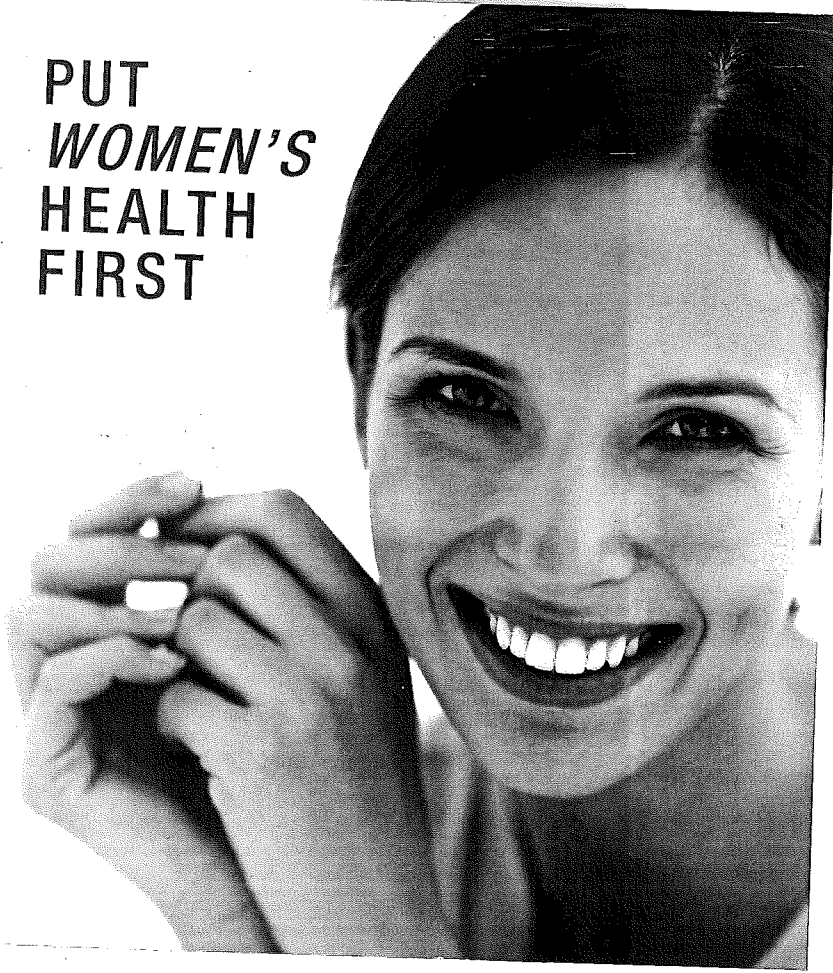
Name Mamie Wilkins
E-mail address Mamiean@juno.com
ZIP Code 27616
Additional Comments:

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

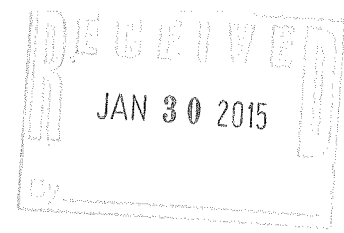


Planned Parenthood Action Fund of North Carolina

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



Planned Parenthood Health Systems
Action Fund, Inc.

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FIRST NAME:

LAST NAME:

Beth Wilkinson

EMAIL:

ZIP:

bethywilkinson@gmail 28205

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!

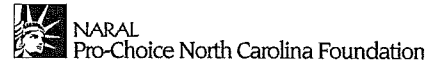
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Name Elizabeth Williams
E-mail address jelizabethww@gmail.com
ZIP Code 27604

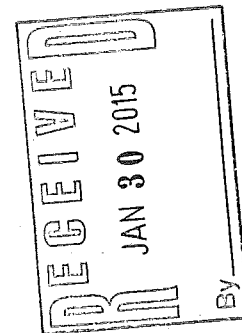
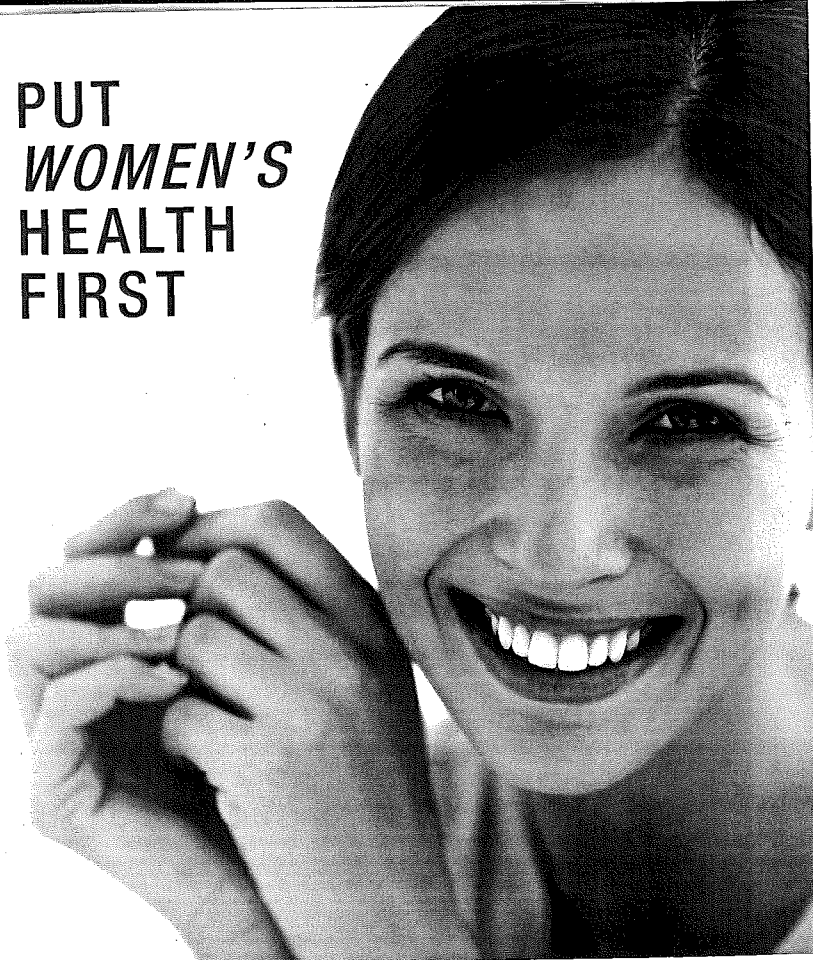
Additional Comments:

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



Planned Parenthood Action Fund of North Carolina

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FIRST**



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

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Name Evelyn Williams

E-mail address evelynwilliams1328@gmail.com

ZIP Code 27511

Additional Comments:

I support the proposed rules as written.

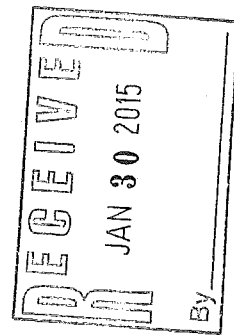
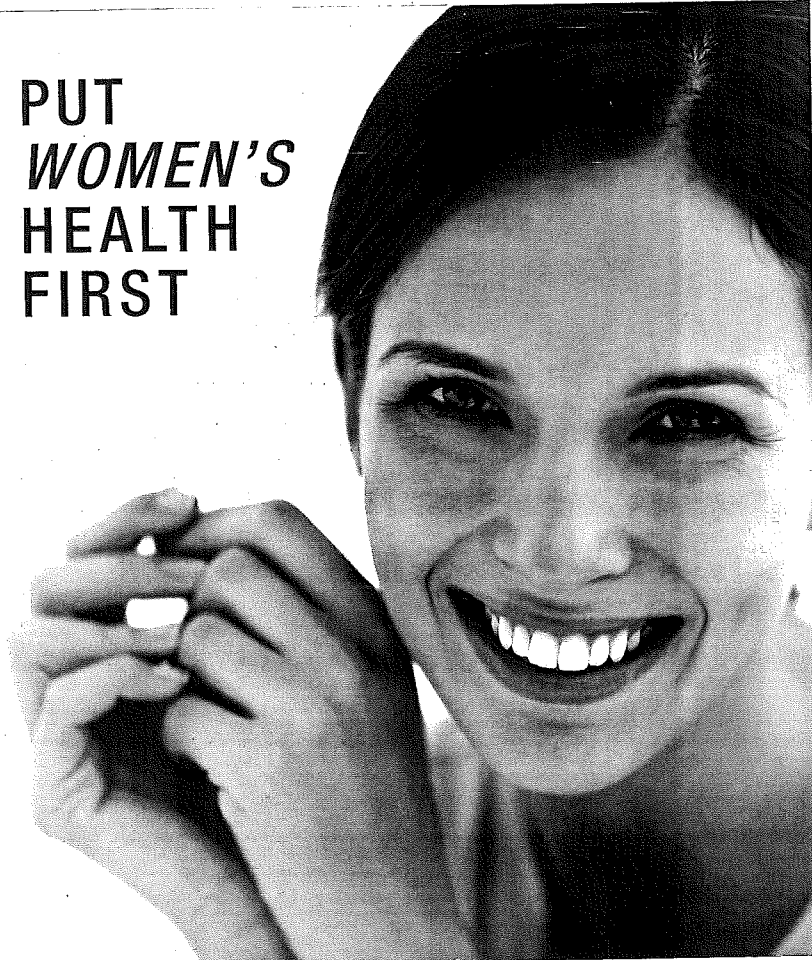
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Name Janice Williams
E-mail address zekes71@yahoo.
ZIP Code 28787

Additional Comments:

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

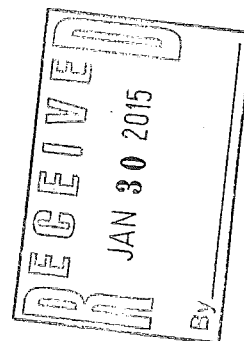
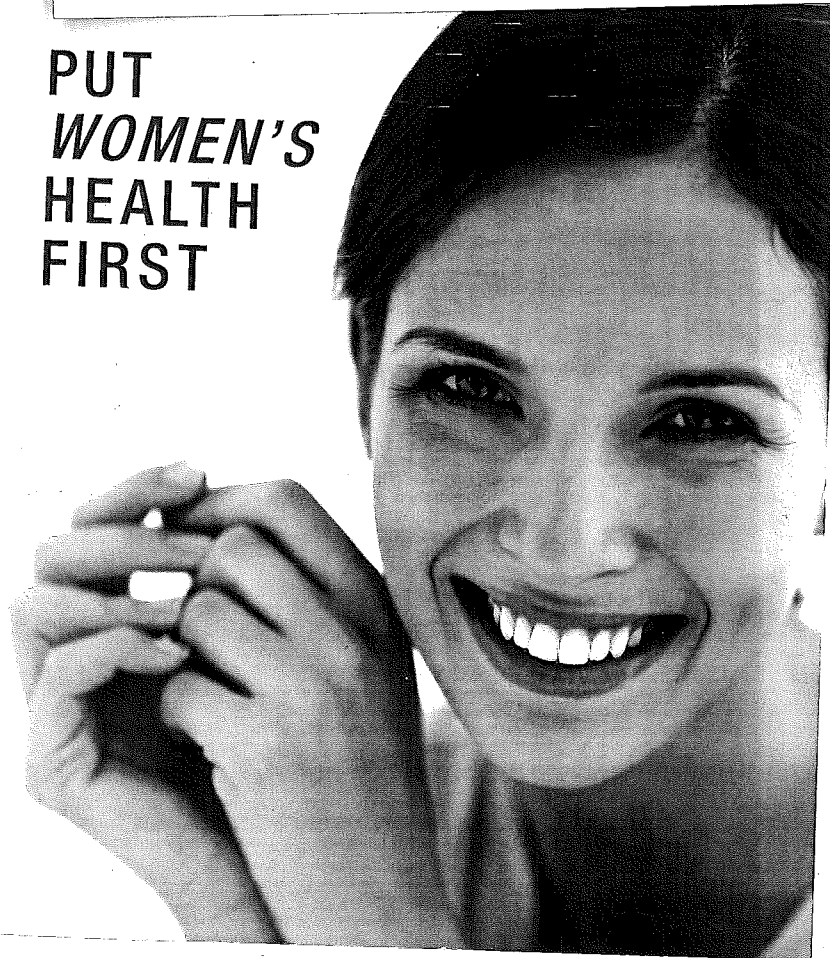


NARAL
Pro-Choice North Carolina Foundati



Planned Parenthood Action Fund of North Carolina

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Name Taylor Williams
E-mail address twilliam@unca.edu
ZIP Code 28804

Additional Comments:

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



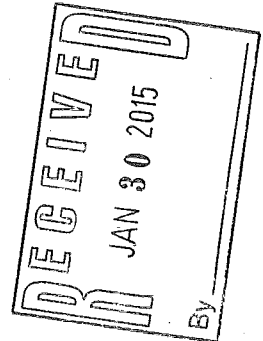
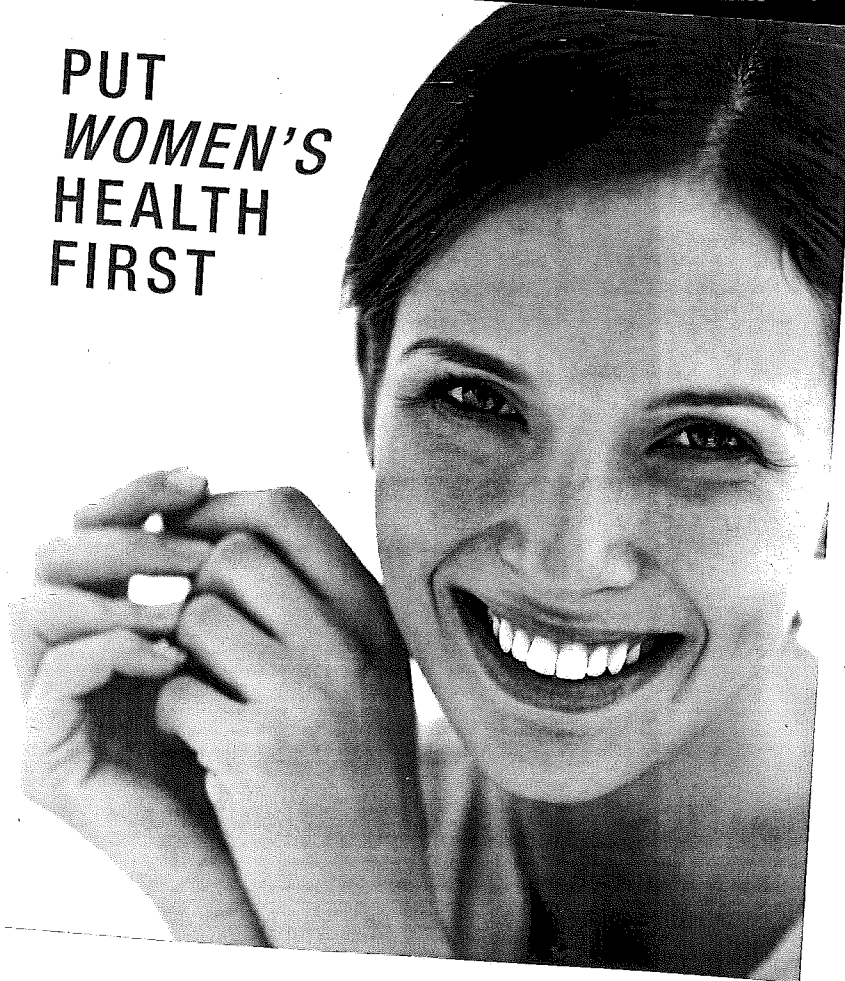
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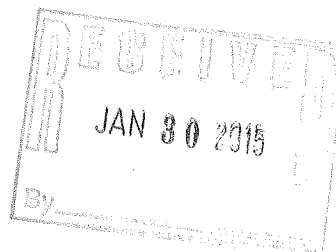
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FIRST NAME:

LAST NAME:

Bertrille Anita Williams

EMAIL:

ZIP:

27545

Optional Comment field:

"Women should make the rules not the legislature"

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 David Willis
E-mail address dwillis27513@yahoo.com
ZIP Code 27520

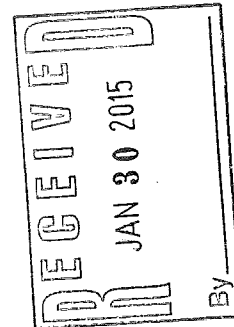
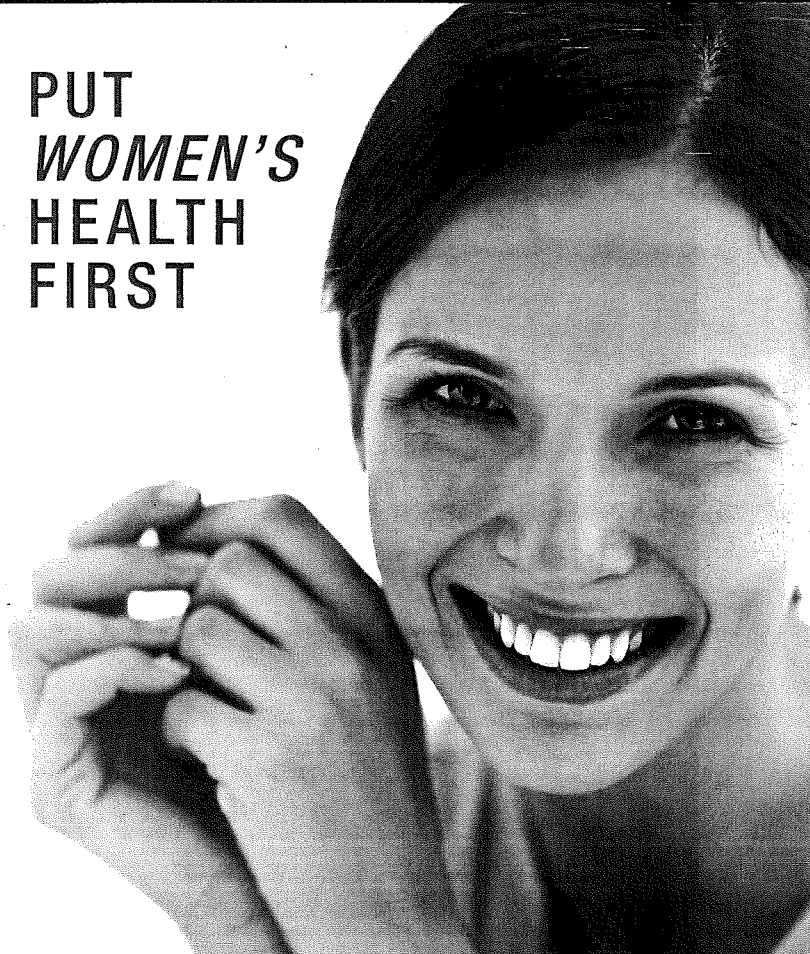
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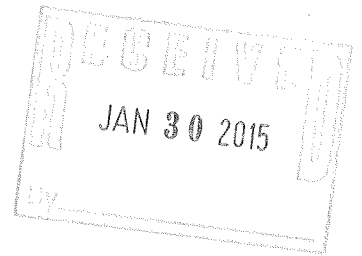
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FIRST NAME:

LAST NAME:

Chrissy

Willis

EMAIL:

ZIP:

chrissywillis@yahoo.com 27526

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 Raney Winch
E-mail address Raney@idire.com
ZIP Code 27606

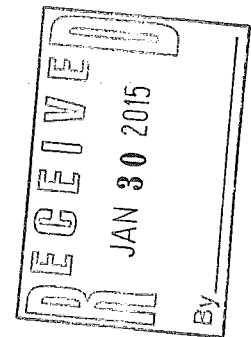
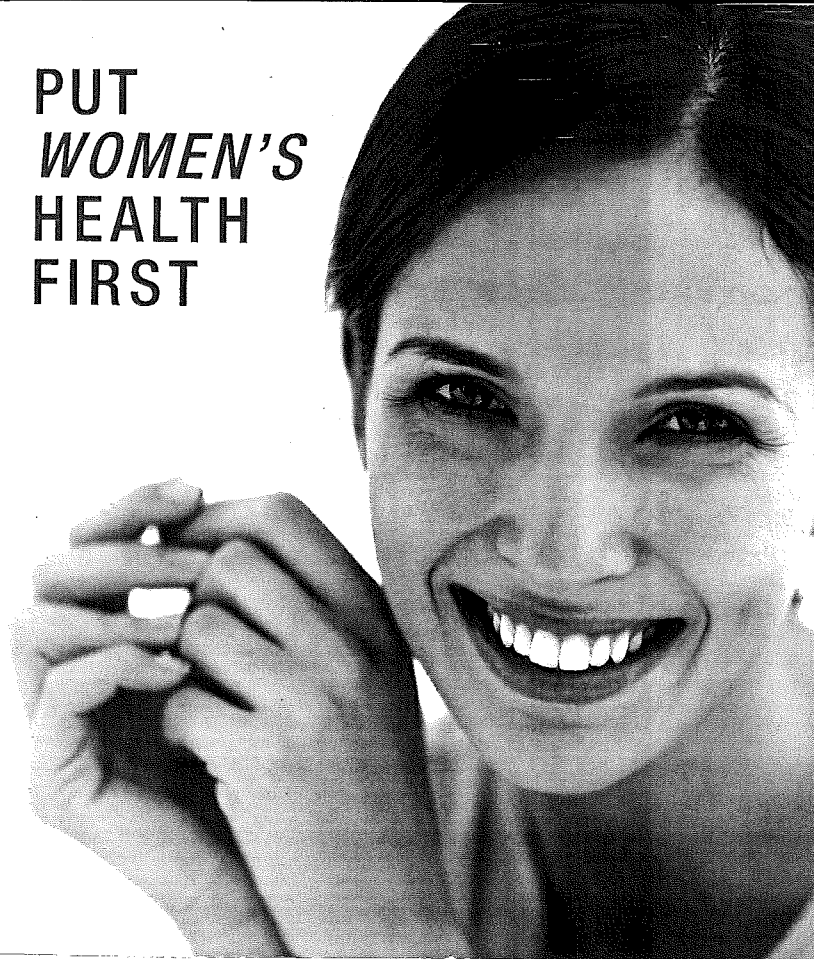
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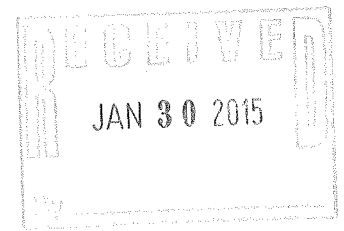
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FIRST NAME:

LAST NAME:

Anne

Wilson

EMAIL:

ZIP:

annegriffswilson@gmail.com

Winston Salem, NC

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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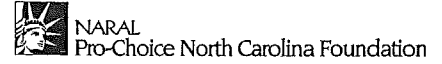
Name Adam Winkler

E-mail address awinkler@lucan.edu

ZIP Code 27607

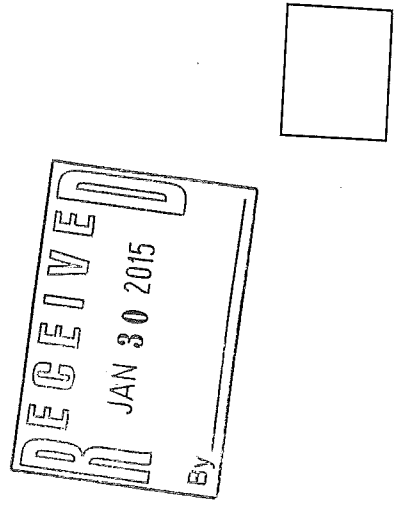
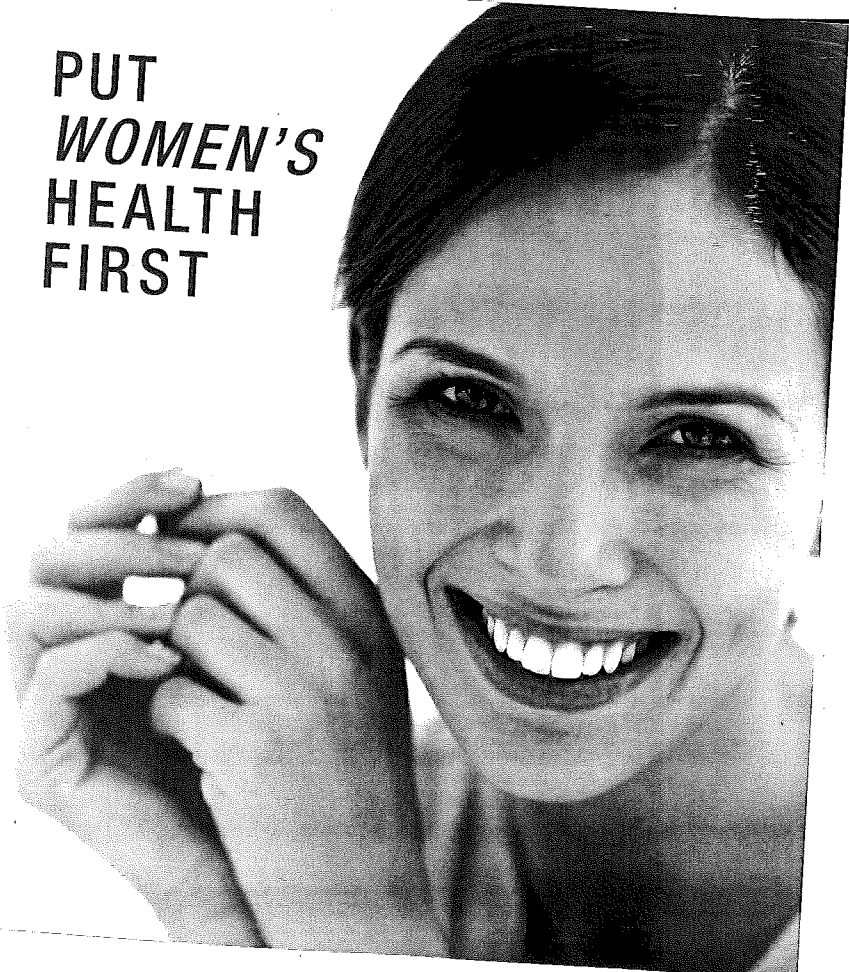
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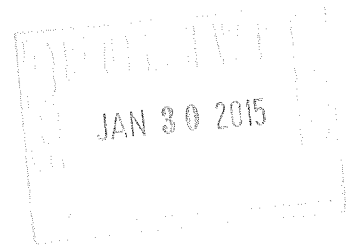
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FIRST NAME:

LAST NAME:

Carol

Winter

EMAIL:

ZIP:

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 Jeta Withers

E-mail address JetaWithers@ncsu.edu

ZIP Code 27606

Additional Comments:

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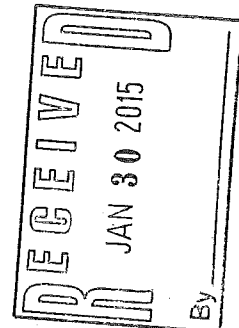
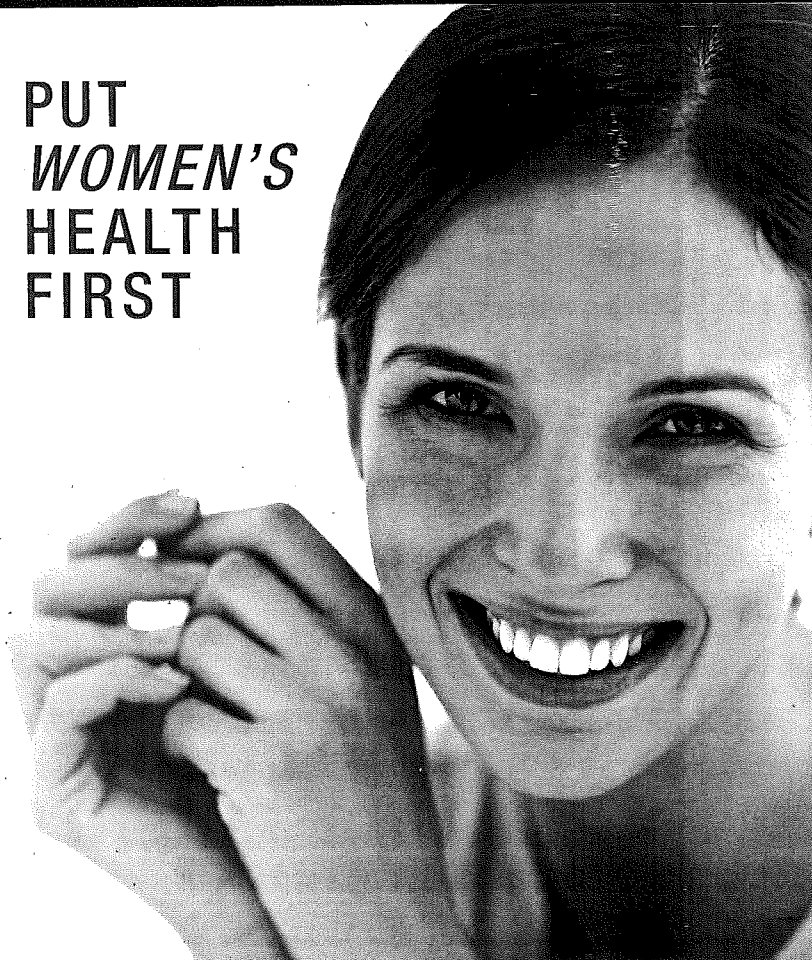


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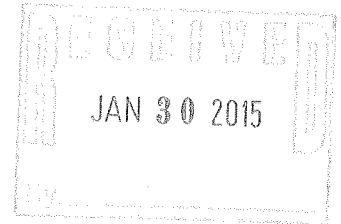
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FIRST NAME:

LAST NAME:

Jonathan

Withrow

EMAIL:

ZIP:

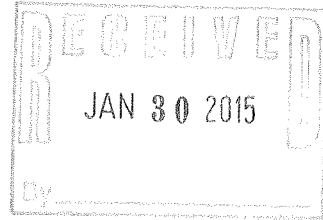
jwithrow@unca.edu 28801

Optional Comment field:

JW

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:

LAST NAME:

Bernadette

Wolf

EMAIL:

ZIP:

wolfgraphics@att.net

28806

Optional Comment field:

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TAKE ACTION!

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Name Flora Wolpert Cheickoff

E-mail address Fwolpert@unc.edu

ZIP Code 27806

Additional Comments:

Thanks 7/4/11

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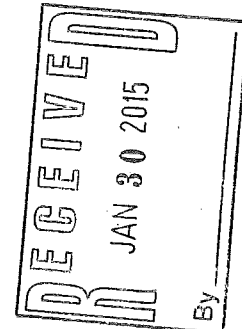
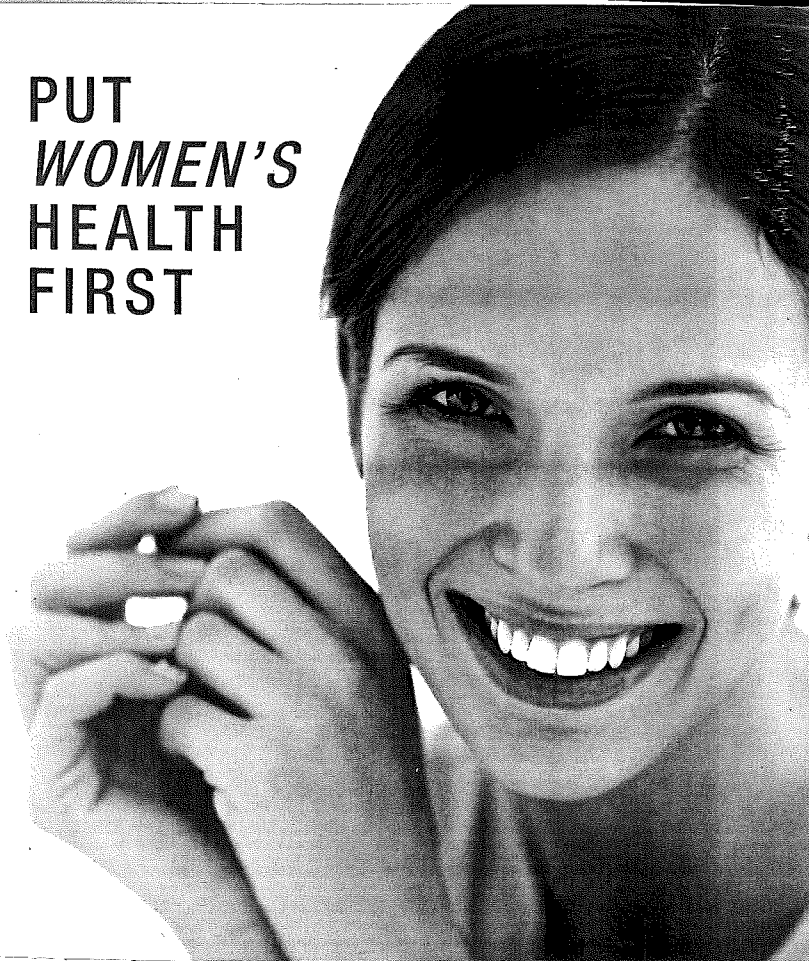


NARAL
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

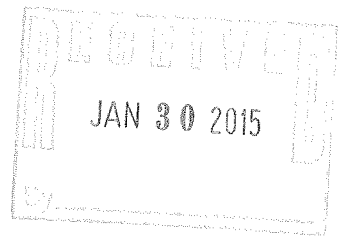
PUT
WOMEN'S
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Nadine Pfeiffer
Division of Health Service Regulation
2701 Mail Service Center
Raleigh, NC 27699-2701



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FIRST NAME:

Ingrid

LAST NAME:

Wood

EMAIL:

ihwood@gmail.com

ZIP:

27603

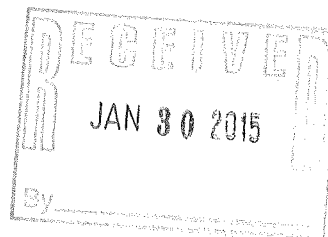
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FIRST NAME:

LAST NAME:

Jennites

Woodruff

EMAIL:

ZIP:

Waycup4good@yahoo.com 28806

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Name NICHOLAS C. WOONER-DEEBS

E-mail address nwooner@gmail.com

ZIP Code 27603

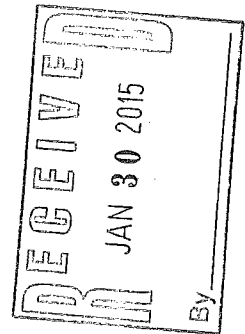
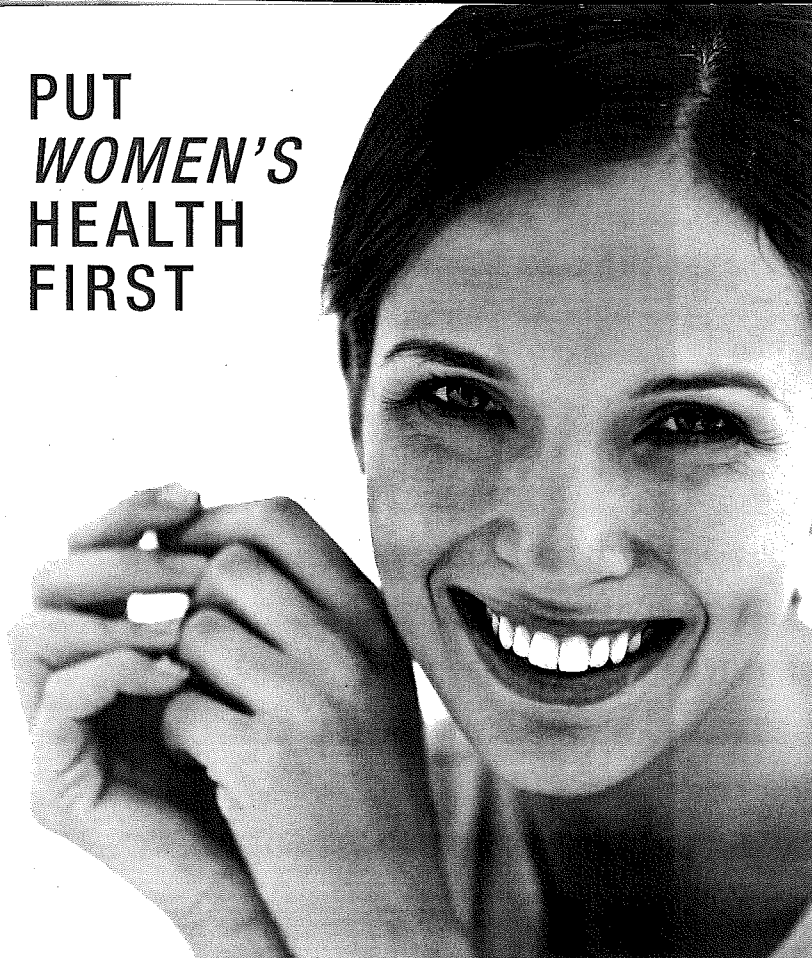
Additional Comments:

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



Planned Parenthood Action Fund of North Carolina

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

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Name Katharine Woomeer-Deters
E-mail address kbdeters@gmail.com
ZIP Code 27603

Additional Comments:

Please keep your
focus on the health
and welfare of
women and listen
to medical
experts!

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

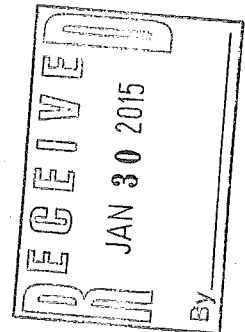
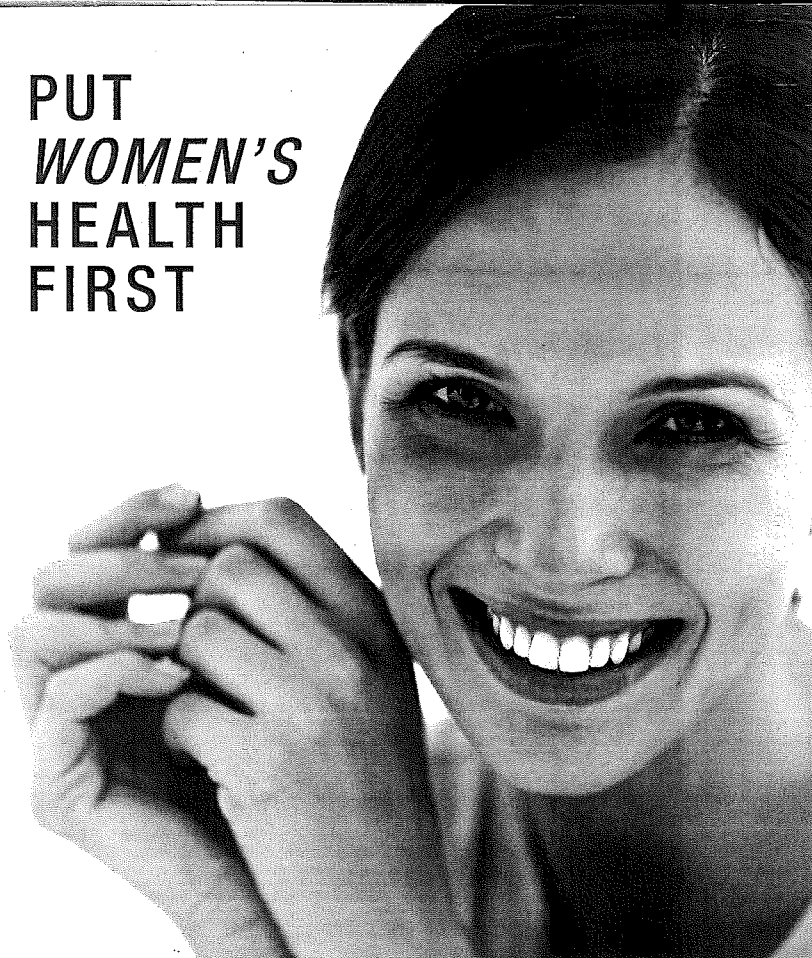


NARAL
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

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Name Kelly Wooten

E-mail address _____

ZIP Code 27516

Additional Comments:

The women of North Carolina who rely on accessible, quality reproductive health clinics deserve the care they need for themselves and their families. Trust women. Trust health care professionals.

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

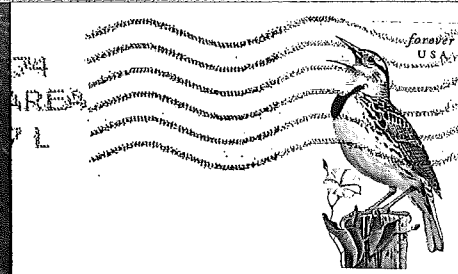
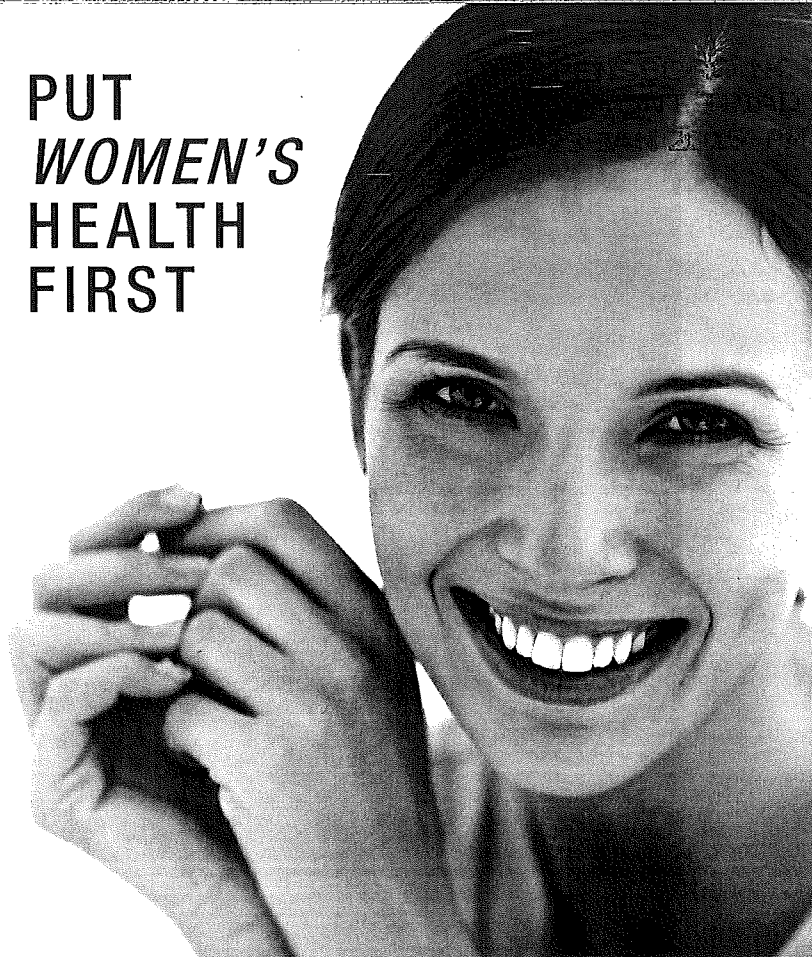


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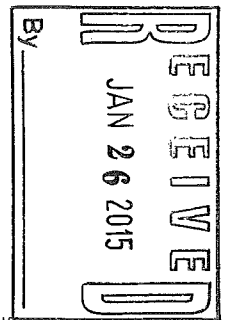


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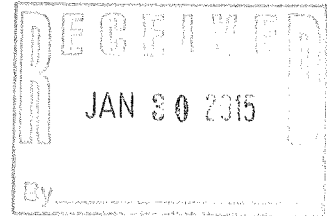
Western Meadowlark



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FIRST NAME:

Alisha

LAST NAME:

Wooters

EMAIL:

alishahellions@gmail.com

ZIP:

28804

Optional Comment field:

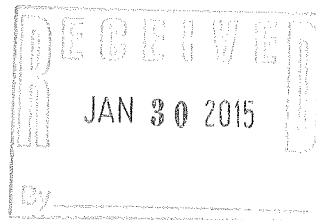
82

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FIRST NAME:

LAST NAME:

Mickayla

Worsham

EMAIL:

ZIP:

worsham10@yahoo.com 27616

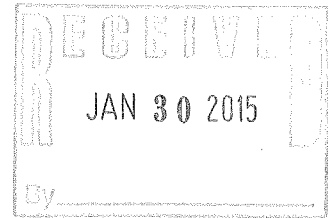
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FIRST NAME:

Amanda

LAST NAME:

Wray

EMAIL:

awray@uncg.edu

ZIP:

28804

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Name Salena Wright
E-mail address Smwright3@ncsu.edu
ZIP Code 27617

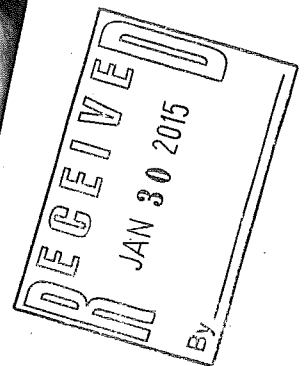
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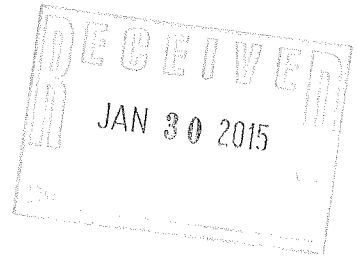
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FIRST NAME:

LAST NAME:

Janet Wright

EMAIL:

ZIP:

janet@wrightenark 28804

Optional Comment field:

janet@wrightenark.com

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Name Mike Wyant
E-mail address MWyant@unca.edu
ZIP Code 27805

Additional Comments:

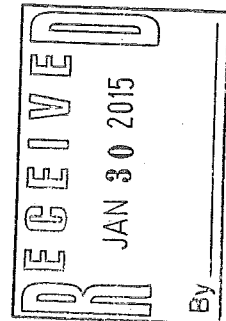
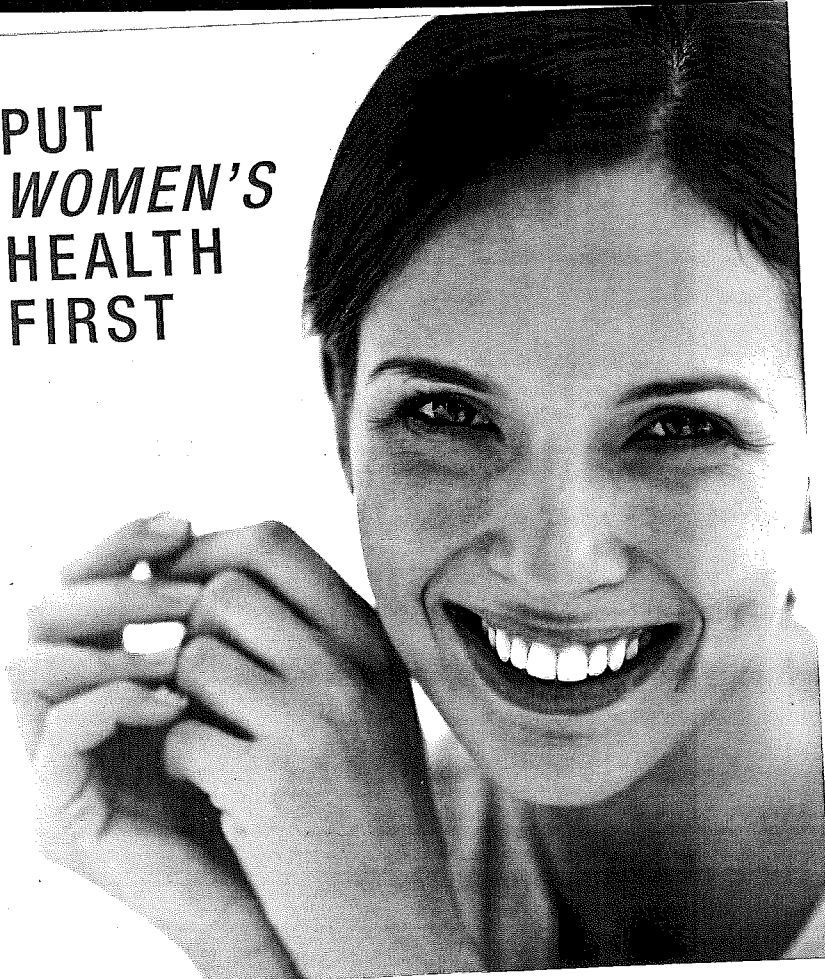
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Act. No matter what.

Planned Parenthood Action Fund of North Carolina

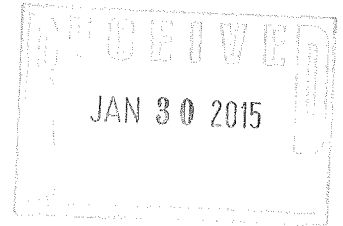
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FIRST NAME:

LAST NAME:

Hunter

Wyche

EMAIL:

ZIP:

HWyche@w-claw.com

27608

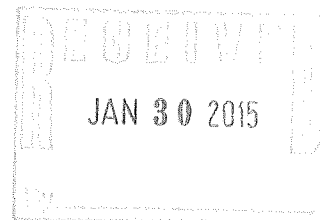
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FIRST NAME:

LAST NAME:

Susan Wyche

EMAIL:

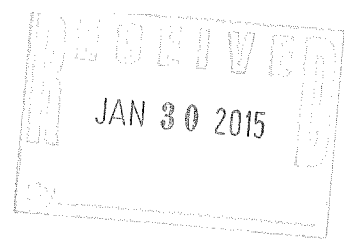
ZIP:

susangwyche@gmail.com 27608

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FIRST NAME:

LAST NAME:

Lucy

Wyche

EMAIL:

ZIP:

27608

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Name Lakisha Wylie
E-mail address lakishawylie@gmail.com
ZIP Code 28314

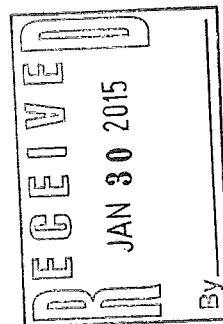
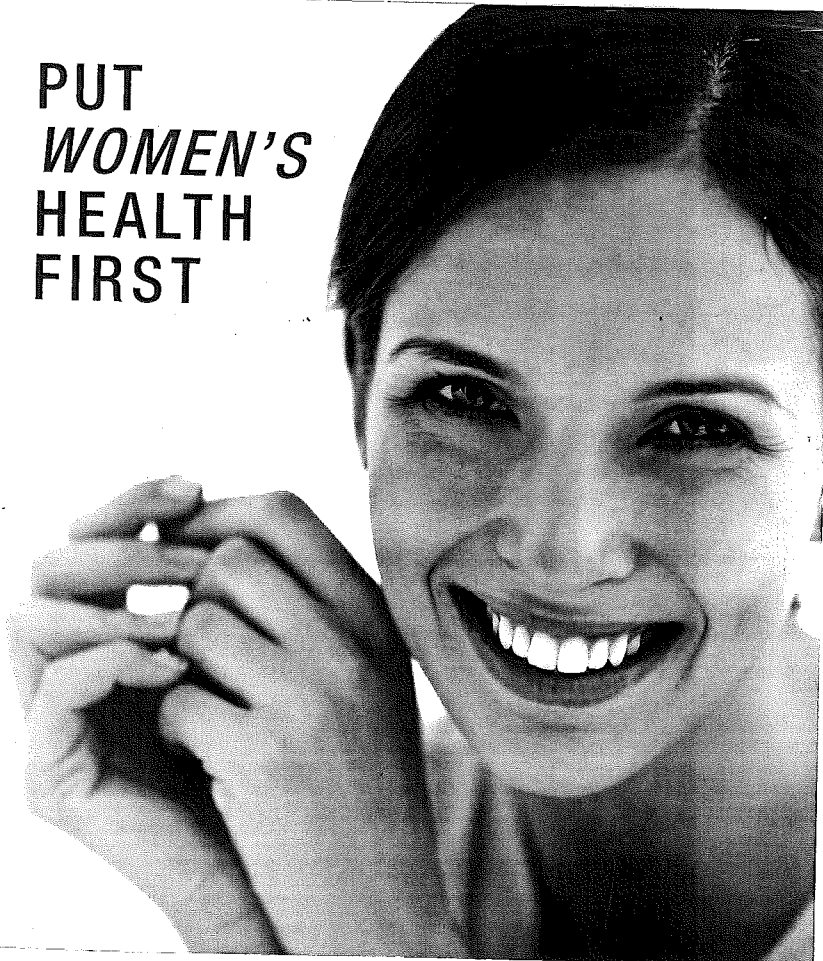
Additional Comments:

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



Planned Parenthood Action Fund of North Carolina

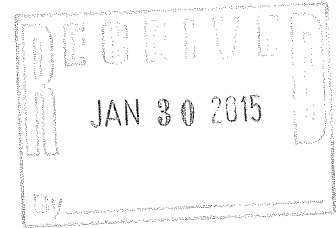
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Nadine Pfeiffer
Division of Health Service Regulation
2701 Mail Service Center
Raleigh, NC 27699-2701



Planned Parenthood Health Systems
Action Fund, Inc.



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FIRST NAME:

LAST NAME:

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Kim.yaman@gmail.com

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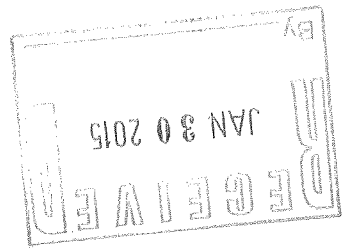
Optional Comment field:

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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:

Jess Yang →

EMAIL:

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Jess.yang05@gmail.com 28904

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:

~~Xanborough~~ ^{xy} Xawer

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28314

Optional Comment field:

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

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Name Ashley Young
E-mail address ayoung3@unc.edu
ZIP Code 28791

Additional Comments:

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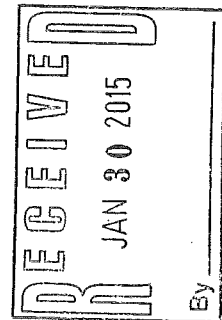
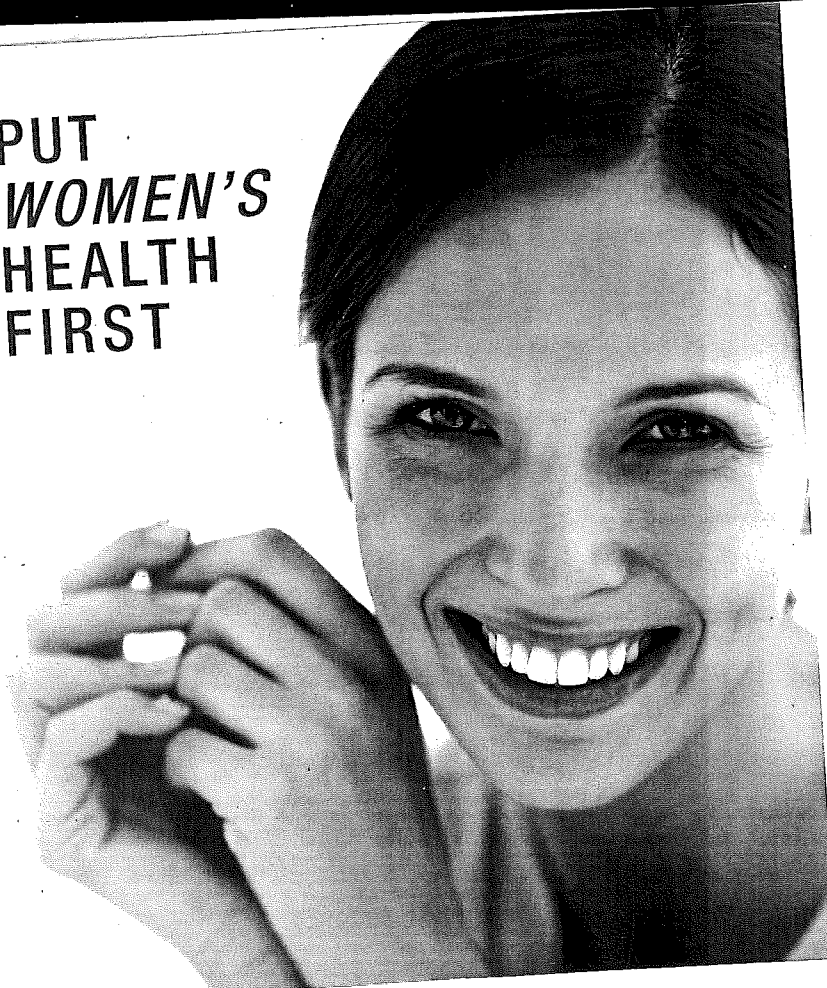


NARAL
Pro-Choice North Carolina Foundation



Planned Parenthood Action Fund of North Carolina

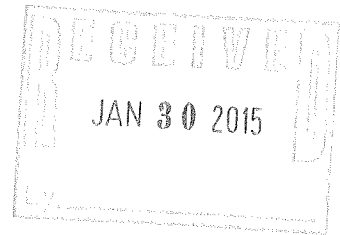
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Nadine Pfeiffer
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2701 Mail Service Center
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FIRST NAME:

Mary-Anne

LAST NAME:

Young

EMAIL:

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

Z

Margaret Zahn
713 Glen Eden Dr
Raleigh, NC 27612

E-mail

ZIP Code

Additional Comments:

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Pro-Choice North Carolina Foundation



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Name AARON ZALONIS

E-mail address azalonis@gmail.com

ZIP Code 27604

Additional Comments:

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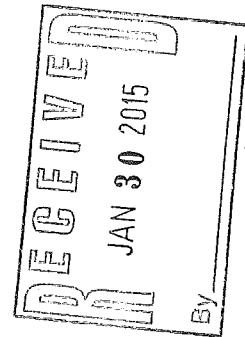
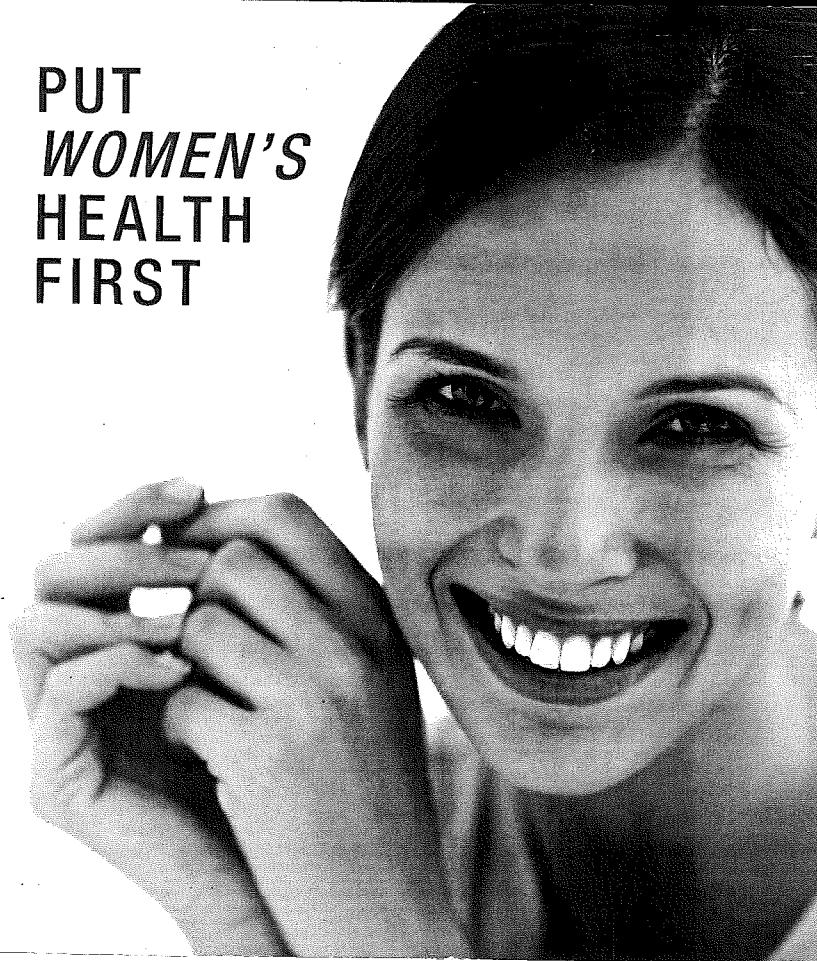


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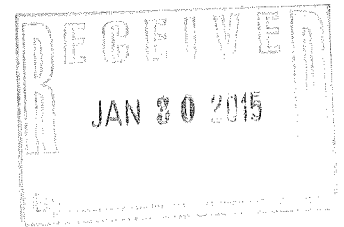
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FIRST NAME:

LAST NAME:

Jose Zapata →

EMAIL:

ZIP:

jzapata@uncla.edu 28801

Optional Comment field:

✓

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Name Katey Zeh

E-mail address Kateyzeh@gmail.com

ZIP Code 27511

Additional Comments:

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Pro-Choice North Carolina Foundation



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Name Courtney Zelaya.
E-mail address CZelaya@brncos.uncfsu.edu
ZIP Code 27610.

Additional Comments:

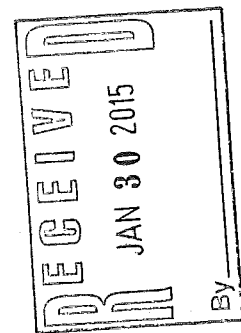
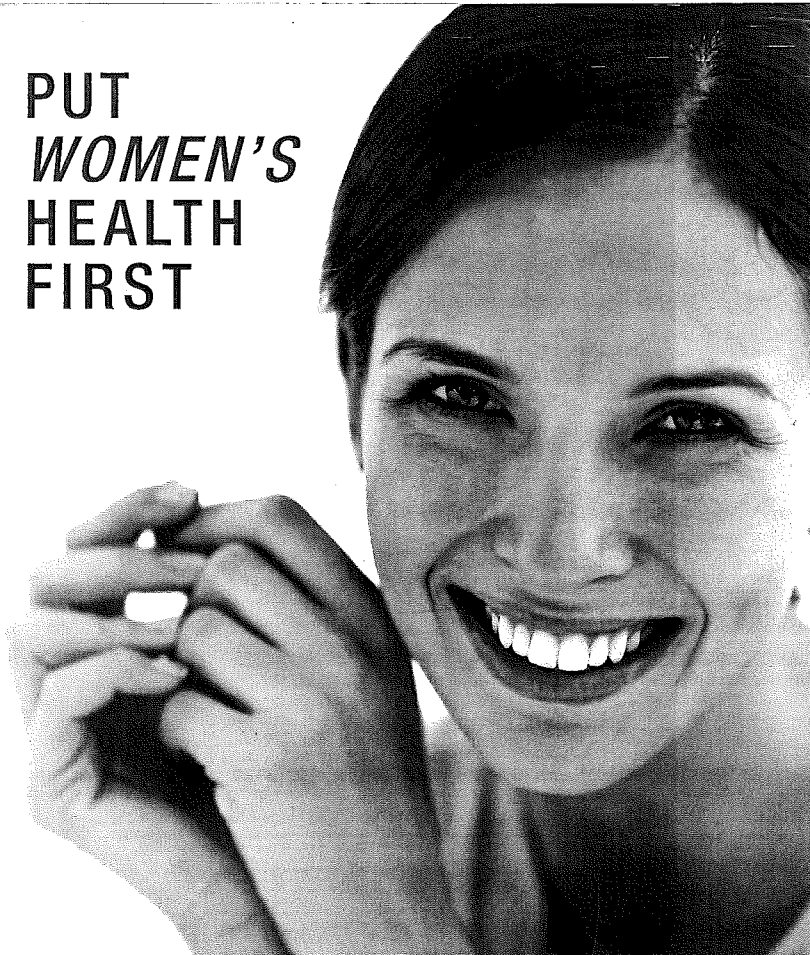
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Pro-Choice North Carolina Foundation

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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
Raleigh, NC 27699-2701

January 30, 2015

The Office of Administrative Hearings
Rules Division
6714 Mail Service Center
Raleigh, NC 27699-6714

Subject: Proposed rules 10A NCAC 14E .0308, 10A NCAC
14E .0101, .0104, .0109, .0111, .0201, .0202, .0206, .0207, .0302-.0307, .0309-.0311, .0313,
and .0315

To Whom It May Concern:

My name is Dr. Matthew Zerden and I'm an obstetrician-gynecologist who provides full-spectrum health care services for North Carolina women. I am here today to speak out in support of efforts to improve patient care and to inject some facts and clarity to the N.C. Department of Health and Human Services' proposed abortion regulations.

To comply with legislation passed in 2013, the Department of Health drafted regulations for clinics that provide abortion care. Over the course of more than a year, they sought input from physicians and other medical professionals to craft proposed regulations based on science and medical evidence—not a political agenda.

As a physician, my No. 1 priority is my patients' safety. Abortion is already extremely safe. Studies, as well as data from the Centers for Disease Control, show that abortion has a safety record of over 99 percent, with a less than 1 percent complication rate. Even with this exceptional safety record, reproductive health care professionals are continually studying ways to ensure that patients receive the best possible care.

Doctors are very much in favor of evidence-based measures that improve safety, but political motivated regulations have become a serious concern. Across the country, we've seen political regulations that have forced clinics to comply with burdensome ambulatory surgical center standards. These are requirement that the most respected professional organization of obstetricians and gynecologists, the American College of Obstetricians and Gynecologists, has found to be medically unnecessary. The main effect of these laws has been that good, safe clinics were forced to shut their doors. In Texas, these medically unnecessary requirements will leave close to a million women without access to essential reproductive health services.

I am encouraged that the Department of Health included medical experts in drafting the proposed abortion clinic regulations. It appears that the right balance was struck between protecting access to a critical reproductive health care service and overseeing clinic safety standards.

Today, I urge North Carolina policymakers to continue to keep this process free of political interference. I'm deeply concerned that state legislators will intervene next week, after the Department's review and comment period is over, and substitute their judgment for the expertise of reproductive health care experts and medical professionals.

This would be a grave mistake. Far from improving patient safety, politicizing this process would jeopardize access to reproductive health care for thousands of women.

You must let health care professionals and medical experts continue to keep patients safe; let good, safe clinics keep their doors open; and let doctors practice medicine without political interference. No doctor should not have to stop providing care because he or she is unable to comply with regulations written by politicians and lacking any basis in medical evidence.

Thank you for your time.

Sincerely,

Dr. Matthew Zerden

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Name Irene Zipper
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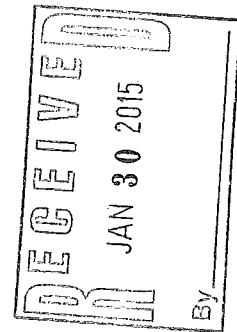
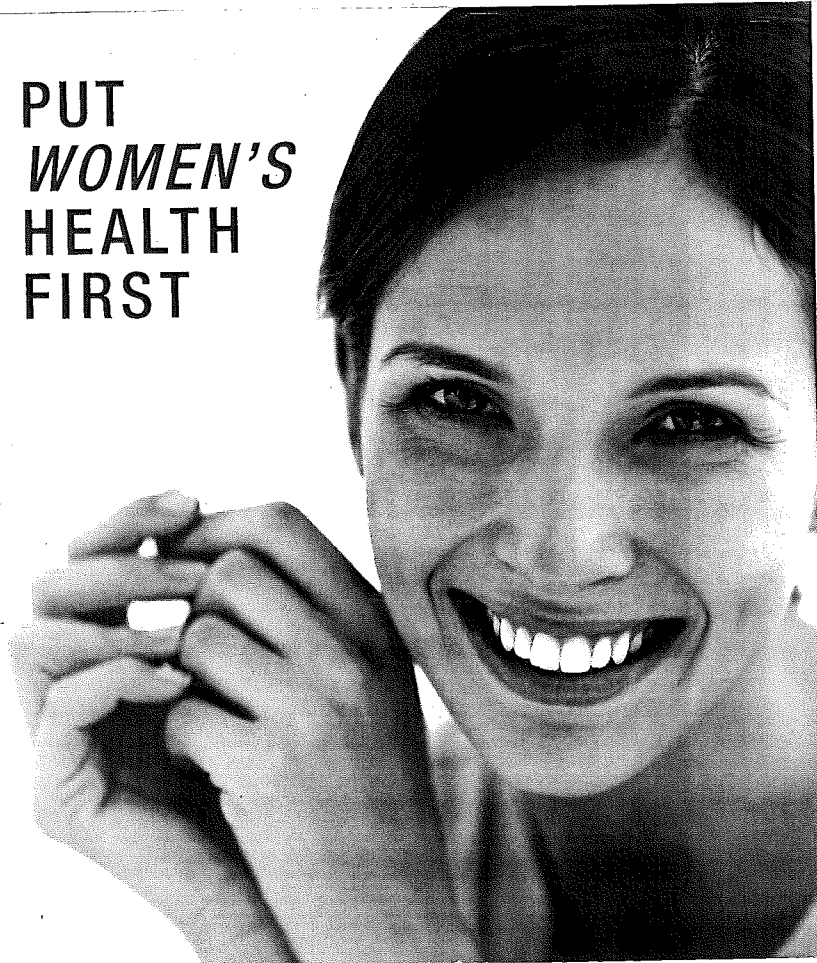
Additional Comments:
Please know that
I STRONGLY support
the draft regulations!

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



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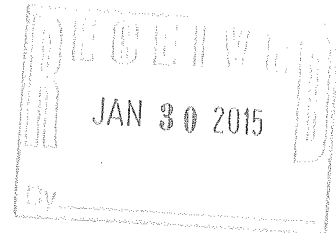
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FIRST NAME:

Diana

LAST NAME:

Zuskov

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dzuskov@gmail.com

ZIP:

27510

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