

Allentown Women's Center[®]

April 15, 2011

Senator Patricia H. Vance
Chair, Public Health and Welfare Committee

Dear Chairwoman Vance:

As an Obstetrician / Gynecologist and the Medical Director of the Allentown Women's Center, I watched and read with great interest the testimony on the proposed statutory changes for abortion clinics that was presented at the public hearing on April 13, 2011. I would like to speak to some of the questions raised by the committee members, specifically:

- a. whether a physician should be a board certified OB/GYN in order to perform a safe abortion;
- b. whether physicians who do abortions should be required to have hospital privileges; and
- c. the differences between abortion clinics and ambulatory surgical centers as it relates to patient safety.

Historically in this country, non-ob/gyn physicians, such as internists, pediatricians, surgeons, and family doctors, have provided abortions safely. Requiring ob/gyn physicians for all abortion care is not warranted. It has never been reported that there are increased rates of complications when non-ob/gyn physicians perform abortions. Early abortion care is within the scope of family medicine. Across the country, academic hospitals are training family practice physicians in early abortion care (medical, electric suction, and manual vacuum aspiration) as well as in obstetrics and other basic gynecologic surgeries. Dr. Gosnell was an unethical bad doctor. It wasn't because he was not an ob/gyn that the atrocities that were found in Philadelphia occurred.

When a patient is transferred to the hospital to manage a complication, it is not the physician who performed the abortion that continues the care at the hospital – it is usually an emergentologist and other physicians working at the hospital that treats the patient. It may be impossible for physicians who do abortions to be credentialed at neighboring hospitals, especially with doctors who travel from out of the area to provide services at a Pennsylvania clinic. There are some hospitals that will not credential a physician if he or she does not have a practice within a certain number of miles, and some hospitals even have policies that physicians with privileges at their hospital are not allowed to provide elective abortions. The stigma against abortion providers is felt not only from extremists targeting us, but also from stigma within the medical field.

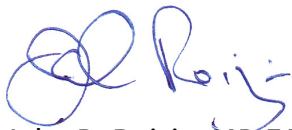
Requiring abortions to be performed in an ambulatory surgical facility (ASF) would provide no additional safety measures for a patient in the event of a complication. If there is a complication in an abortion facility that requires a blood transfusion or laparotomy, for example, the patient would be transferred to the hospital in the same exact manner as she would be if she were in an ambulatory surgical facility. Neither of those services would be performed in an ambulatory surgical facility – the patient would have to be transferred. There are no additional services that an ASF could provide to further protect a patient than are already present in an abortion facility under current regulations.

ASF regulations would increase costs due to the building and staffing requirements, and these costs would have to be passed on to patients as an onerous surcharge. This would only serve to decrease access to safe abortion providers. As we heard in Tyhisha Hudson's testimony on Wednesday, women will try to seek out the cheapest provider, regardless of quality. It is the responsibility of Pennsylvania legislators to ensure women's safety by making sure that safe, quality services remain affordable. This is particularly important in this state where Pennsylvania Medicaid prohibits the coverage of abortion services.

I strongly urge the Senate Public Health and Welfare Committee to reject legislation that restricts non-OBGYNs from providing abortion services, legislation that requires doctors who provide abortions to maintain privileges at a neighboring hospital, and legislation that requires abortion facilities to be held to ambulatory surgical center regulations.

Please contact me if you have any further questions on these issues.

Sincerely,



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Medical Director
Allentown Women's Center
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cc:

Senator Kitchen, Democratic Chair, Public Health and Welfare Committee
Members of the Public Health and Welfare Committee

“All Women Count at AWC”