

Comments by Arina Grossu on behalf of Family Research Council to the Virginia Board of Health:

Governor McAuliffe has called for the Virginia Board of Health to revisit recently promulgated abortion facility minimum safety standards. These standards were put in place just last year to protect Virginia women, following a lengthy review process with input from the general Assembly. Family Research Council urges the Board of Health not to water down safety standards at Virginia abortion facilities.

Abortion is by definition a medically invasive procedure. As such, abortion facilities in Virginia must not be held to a lower health and safety standard than other medical facilities. Abortion is never safe for babies and the abortion industry has a long track record of safety violations with adverse medical consequences for mothers. There are many cases where women are seriously injured or die due to abortion complications such as perforations to the uterus, sepsis, hemorrhage, and cardiac arrest. The main factors causing injury or death include unlicensed or unqualified staff performing abortions without the proper training, off-label drug use (a cost-cutting measure that can result in botched abortions), expired medication, unsanitary conditions, outdated medical equipment, and buildings that do not meet the minimum safety standards for outpatient surgical facilities. Lowering minimum safety standards in Virginia abortion facilities is not in the best interest of Virginia women and would further mask ongoing unsafe and unethical practices by abortionists.

In 2012, the Virginia Department of Health found [80 violations](#) in nine facilities they inspected. The inspection report for the Falls Church Healthcare Center (Falls Church, VA) listed [41 pages of deficiencies](#). Within a three month time period in 2013, abortionists at this facility [botched two abortions](#) that subsequently required emergency patient hospitalization. The 2012 inspection report of Tidewater Women's Health Clinic (Norfolk, VA) found that the bottom of one of its freezers was covered with frozen blood and fetal remains that had been stored there until the weekly pickup of "medical waste".

According to documents obtained by The Family Foundation of Virginia from the Virginia Department of Health through the Freedom of Information Act, the 80 violations in the nine facilities included:

- "18 citations for personnel issues, including no background checks, no ongoing plans for staff training, no maintenance of personnel files, no policy requiring staff to be CPR trained, no policies setting experience and training required to practice
- 13 citations for infections prevention issues, including seven clinics with no clear division between clean and dirty utility areas, four centers where personnel weren't using personal protective equipment and a host of record keeping issues
- 10 citations regarding the administration, storage and dispensing of drugs including four with expired drugs in stock, and others with improper labeling of drugs, no medication dispensing policy
- 10 maintenance of equipment citations including equipment not in good repair, no preventative maintenance plan

- 6 citations for local and state building code violations.”

Another harmful effect that unraveling minimum safety standards would have on Virginia women is the empowerment of abortionists such as late-term abortionist, [Steven Brigham](#), who continues dangerous, fraudulent and unethical abortion practices. Brigham, who has had his license suspended in up to six states, currently starts late-abortions in Virginia, then transports women across state lines to his facility in Maryland to finish the abortions. Brigham has personally injured and killed multiple women by his dangerous abortion practices.

Revoking regulation of abortion facilities is a public health risk. A lack of minimum safety standards at abortion facilities allows abortionists to continue performing abortions on vulnerable women in unsafe environments without legal consequences. This is unacceptable. If these safety standards are revoked, we will see the proliferation of unaccounted dangerous practices, jeopardizing the lives of Virginia women. I urge the Virginia Board of Health to keep the current abortion facility safety regulations in place.

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