August 20, 2013

Dr. Mary Currier, Mississippi State Health Officer Mississippi State Department of Health P. O. Box 1700 Jackson, MS 39215-1700

Re: Jackson Women's Health Organization's Non-compliance and Recent Hospitalization of Patient

Dear Dr. Currier,

We are writing you to express our concern that Jackson Women's Health Organization (JWHO) has been in a continuing state of non-compliance with the Abortion Reporting Law enacted in 2004, Miss. Code Ann. 41-41-78. We have carefully studied the public records produced by the MSDH and wish to call to your attention several serious discrepancies that need clarification.

We bring this to your attention at this time in light of the permanent injunction issued August 9, 2013, by the Alabama Department of Health, closing New Woman All Women abortion clinic due to numerous deficiencies, including irregularities in abortion reporting. JWHO is owned and operated by the same team (Ms. Diane Derzis and Dr. Bruce Norman) formerly doing business at the Alabama New Woman All Women abortion facility, so we have serious reason to believe that there are significant reporting violations in Mississippi as well.

These reporting irregularities in Mississippi's abortion statistics include, but are not limited to:

1. The reporting of 529 abortions where the age of gestation was "unknown" (2011 statistics, p. 44). Ultrasound calculation of gestational age is required by the clinic to calculate both the method and the price of the abortion procedure. A complete audit should be undertaken on the clinic files to recalculate and correct this inaccurate and unacceptable reporting. It is possible that later term abortions, which JWHO doesn't want to acknowledge for public relation reasons, may be hidden in this "unknown" gestational age category.

2. There is NO reporting of chemical (RU 486) abortions, even though these are advertised on JWHO's website. A thorough investigation of clinic records should be made and the statistics corrected as indicated. This should be retroactive to when the abortion drug became approved for use in the United States.

3. On Wednesday, August 7, 2013, an ambulance transported a patient from JWHO to University Medical Center. Reporting of complications, which should include infections and bleeding as well as hospitalizations, is amazingly low for a facility performing several thousand surgical procedures a year. Documentation of post operative follow up should be validated to assure that the public is aware of the reality of JWHO's complication rate.

This recent event underscores the reasonableness of Mississippi's "Mandatory Hospital Privileges" law which is currently being challenged in the courts. We can only hope that Dr. Bruce Norman sent enough medical information with this unfortunate woman to allow the admitting physician to safely correct her complication. Requiring continuity of care via hospital admitting privileges can help Mississippi to avoid the tragic deaths suffered by recent abortion victims Jennifer Morbelli and Tonja Reeves. Morbelli, age 29, died from a legal abortion on February 7, 2013, in Maryland. Her abortionist, Dr. Leroy Carhart, did not have hospital admitting privileges. Tonja Reeves, age 24, bled to death following an abortion at a Planned Parenthood abortion clinic in Chicago on July 20, 2012. Again, her abortionist did not have hospital admitting privileges.

We, the people of Mississippi, depend on our State Board of Health to protect the lives and health of its citizens by enforcing standards of safe medical practice for ALL outpatient surgical clinics. Letting JWHO operate under substandard of care, just because it is an abortion facility is placing the lives and health of Mississippi women in jeopardy. An accurate accounting of abortion statistics is essential to monitor the quality of care provided by JWHO. We anxiously await the correction of these deficiencies.

Very truly yours,

Jana Mishoem

Dana Chisholm Pro-Life Mississippi

Whitehead

Barbara Whitehead Mississippi Right To Life

everlex We Millan WS

Beverly McMillan, M.D. Physicians for Life Mississippi

Peni Deni

Terri Herring Pro Life Action Network

cc Gov. Phil Bryant Lt. Gov. Tate Reeves Speaker Philip Gunn Rep. Sam C. Mims, V Sen. Dean Kirby Atty. Gen. Jim Hood Mississippi State Board of Health