



*On the leading edge of women's health*

February 25, 2004

Secretary Tommy Thompson  
U.S. Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Secretary Thompson:

On behalf of the National Association of Nurse Practitioners in Women's Health (NPWH), I am writing to support making Plan B® emergency contraception available over-the-counter, with no restrictions.

Emergency contraception (EC) has the potential to reduce unintended pregnancy and abortion in half. Our members have been prescribing emergency contraception for a number of years. However, we have limitations for being able to provide this prescription to women when they need it. Time is of the essence in maximizing the enormous potential of EC. Taken within 72 hours after unprotected sex or birth control failure, Plan B reduces the average risk of pregnancy by 89%.

Unfortunately, EC is difficult to obtain within the short window of effectiveness. Many health care providers are not available on weekends or evenings when emergency contraception is often needed most. While 72 hours is generally cited as the time frame for effective use, there are scientific data that show the sooner emergency contraception is taken after exposure the greater the effectiveness. It simply does not make good health care sense to make women wait for something when that wait makes it less effective. Major health care professional organizations and indeed, the FDA's own advisory committee, feel Plan B is safe to be provided over-the-counter.

We know there has been some concern expressed about the availability of OTC Plan B leading to an increase in sexual activity among young people. However, there is no evidence that supports this cause and effect concern any more than seat belts and airbags cause drivers to drive recklessly. But like airbags and seatbelts, emergency contraception should be there when it is most needed—immediately after the accident.

Do we want women, particularly adolescents, to seek our care if they are sexually active? Of course we do. However, we do not support the notion that they should compromise their chance of preventing an unintended pregnancy by placing barriers to obtain emergency contraception. Moreover, if as studies have shown, we can avoid those

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Secretary Tommy G. Thompson  
February 25, 2004  
Page Two

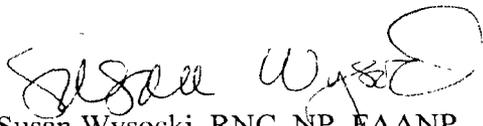
unintended pregnancies, then our first encounters with patients can be spent on health promotion and not dealing with the crisis of an unintended pregnancy.

As health care professionals who want the best care provided to women, we fully support making Plan B available over-the-counter. Over-the-counter availability puts this safe and effective drug where women can access it the soonest—in their local drug store where there is no wait for an appointment or for an office to open on Monday morning.

We have attached our position paper on over-the-counter status for emergency contraception that outlines further details about our position.

We urge you to support the approval of Plan B for over-the-counter status without delay.

Sincerely,



Susan Wysocki, RNC, NP, FAANP  
President and CEO

enclosure



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## **POSITION STATEMENT OVER THE COUNTER STATUS FOR PLAN B EMERGENCY CONTRACEPTION**

*Founded in 1980, the mission of the National Association of Nurse Practitioners in Women's Health (NPWH) is to assure the provision of quality health care to women of all ages by nurse practitioners. NPWH defines quality health care to be inclusive of an individual's physical, emotional, and spiritual needs.*

*NPWH recognizes and respects women as decision-makers for their health care. NPWH's mission includes protecting and promoting a woman's right to make her own choices regarding her health within the context of her personal, religious, cultural, and family beliefs.*

Over the counter status for Plan B emergency contraception assures that a safe and effective product is accessible to women when they need it. The safety and efficacy of this product is well documented. In addition, studies demonstrate that the efficacy of this product is greater when it is taken soon after unprotected intercourse. Over the counter availability would ensure women access to Plan B within a short time frame, thus increasing its effectiveness.

Over the counter status recognizes women's intelligence and foresight to use the product as needed and as directed, and supports their right to self determination. Existing evidence does not support the concern that women will misuse this product if it is available without a prescription.

Over the counter status for Plan B emergency contraception reflects NPWH core value of recognizing and respecting women as decision makers for their health. Therefore, NPWH supports the switch from prescription to over the counter status for Plan B ® emergency contraceptive pills without reservation.

### **References:**

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