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Making the case for advance provision of mifepristone and misoprostol for abortion in the United States

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16 **INTRODUCTION**

17 In the United States (US), mifepristone used together with misoprostol is registered by the Food  
18 and Drug Administration (FDA) for termination of intrauterine pregnancy through 70 days' gestation.[1]  
19 While medication abortion is safe and effective,[1] current FDA requirements delineated in the Risk  
20 Evaluation and Mitigation Strategy (REMS) for mifepristone mandate that it be dispensed in a clinic,  
21 medical office, or hospital.[2] Patients then complete the medication regimen outside of the facility. Post-  
22 treatment assessment is recommended to ensure the pregnancy is not ongoing, which can take place in  
23 person or remotely.[3] While there is little evidence demonstrating that the mandated dispensing  
24 requirement improves patient safety, it may pose an insurmountable barrier for people unable to travel to  
25 an abortion facility.[4] In addition, hostile policy environments have made abortion nearly unattainable in  
26 some US states, a situation that may worsen in the near future as the US Supreme Court considers a case  
27 challenging *Roe v. Wade*. [5] The recent passage of Texas Senate Bill 8 (SB 8) bans most abortions after 6  
28 weeks' gestation.[6] While it is still being challenged in court, this law effectively forces people to travel  
29 out of state to access care, increasing the travel distance and cost to reach a clinic. These barriers will  
30 create delays in accessing care, pushing some patients later in pregnancy before they can obtain the  
31 service and preventing others from obtaining a wanted abortion entirely.

32 Since April 2021 and for the duration of the COVID-19 public health emergency, the FDA is  
33 exercising enforcement discretion regarding the in-person dispensing requirement for mifepristone, which  
34 allows providers to mail mifepristone to patients or use a mail order pharmacy.[7] Reducing the need for  
35 in-person clinical encounters using telehealth and other strategies can improve the patient experience and  
36 increase access to abortion earlier in pregnancy.[8] Innovations in abortion provision, particularly those  
37 that improve access to early abortion, are essential components of comprehensive reproductive health  
38 care, which includes access to the full range of contraceptive options, including emergency contraception.

39 Currently there are several new models of medication abortion provision that remove required in-  
40 person visits and pre-abortion ultrasound, as recommended by professional groups,[9, 10] and are being

41 implemented globally. These models include implementation of a no-test protocol, mail order, and  
42 pharmacy provision; research indicates these models are safe, effective, and acceptable to patients.[8, 11-  
43 17] Much of the growth in streamlined options of abortion care stem from the COVID-19 pandemic. As  
44 medication abortion service delivery evolves and depends less on in-person visits with a clinician, it is  
45 worth considering whether it might be advantageous to patients to have the medications on hand before  
46 they need them.

47         Advance provision of medication abortion pills is an unexplored care model that we believe holds  
48 promise and merits further study. Advance provision of mifepristone and misoprostol involves a clinician  
49 providing the medications to patients who want to avoid pregnancy but are not pregnant at the time of  
50 dispensing. We illustrate here how advance provision of medication abortion pills might work in practice  
51 and make the case for studying the model further. This editorial focuses on the US because of the  
52 formative research indicating interest in the model there; however, advance provision of medication  
53 abortion could have applications in other countries as well.

54 **EXPANDING MEDICATION ABORTION ACCESS HELPS PATIENTS ACCESS CARE**  
55 **EARLIER IN PREGNANCY**

56         Studies performed in the US and other countries demonstrate that medication abortion has a high  
57 level of acceptability for most patients seeking pregnancy termination.[18,19] In the US, medication  
58 abortions accounted for an estimated 60% of all abortions up to ten weeks' gestation in 2017, up from  
59 45% of eligible abortions in 2014.[20] In a meta-analysis of approximately 4,500 patients who had a  
60 medication abortion with mifepristone and misoprostol, over 85% were satisfied with the experience.[21]  
61 Some evidence suggests that improved access to mifepristone enables people to obtain abortion earlier in  
62 pregnancy and reduces the need for second-trimester abortion.[22] Conversely, studies have shown that  
63 abortion restrictions contribute to increases in gestational age at abortion, thereby decreasing eligibility  
64 and use of medication abortion.[23, 24]

65 In the US, policy restrictions have resulted in limited abortion services and clinic closures across  
66 the country, increasing the distance people live from the nearest provider.[25] Longer travel distances can  
67 increase the cost and logistical difficulty of getting to a clinic, delaying access to timely abortion care and  
68 imposing burdens on those with the fewest resources.[26, 27] In particular, Texas' 6-week ban creates an  
69 exceedingly narrow window for people to confirm pregnancy and access abortion care, pushing in-state  
70 services out of reach for most Texans.[28] During the COVID-19 pandemic, abortion became  
71 unattainable for some.[24, 29] Overlapping barriers of policy restrictions, long travel distances, shelter-in-  
72 place orders, and the public health risks of travel have left patients with few options.

73 Even in settings where there is good access to care in the US, there is inevitably some delay  
74 between the initial call to the clinic and having an in-person appointment to obtain medication abortion;  
75 in settings with restricted access, that delay may be longer. According to a 2014 US national survey of  
76 abortion patients, the average wait time between the scheduling call and obtaining an abortion was  
77 approximately seven days.[30] For 7% of patients, their wait time exceeded 14 days.[30] For those who  
78 do not recognize pregnancy immediately, common even among first-trimester abortion patients,[31,32]  
79 the delay to care is compounded and may push some patients beyond the gestational duration limit for  
80 medication abortion.[33] Telehealth provision may reduce the scheduling delay, but it introduces a delay  
81 associated with mailing the pills, and requires that patients be able to receive the medications by mail.  
82 The advance provision model would effectively shorten the time between the decision to have an abortion  
83 and obtaining care to zero days.

#### 84 **HOW WOULD ADVANCE PROVISION OF MIFEPRISTONE AND MISOPROSTOL WORK?**

85 Clinicians could screen interested patients for some contraindications to medication abortion prior  
86 to pregnancy, while others would need to be evaluated immediately prior to use (see Table). Clinicians  
87 could use the screening criteria included in the no-test protocol to exclude patients at higher risk of  
88 ectopic pregnancy based on history.[11] Clinicians could also screen in advance for other medical  
89 conditions that are contraindications (see Table). These conditions could change over time, and clinicians

90 could give patients a checklist to help them reassess for these contraindications before using the  
91 medications and encourage them to call to discuss any change in their health history.

92 [Table here, see line 187]

93           At the time of dispensing, the clinician would provide education on menstrual tracking,  
94 pregnancy recognition and testing, how to self-assess for eligibility at the time of pregnancy, how to  
95 administer the medications at home, and the necessary follow-up. In particular, the clinician would  
96 explain to the patient how to self-assess for ectopic pregnancy risk and gestational duration at the time of  
97 pregnancy prior to using the medications (see Table). Patients would be instructed to confirm the  
98 pregnancy with a home urine pregnancy test. If they had symptoms suggestive of ectopic pregnancy or if  
99 their self-assessed gestational duration was >70 days (or >77 days if that limit is used [34]), patients  
100 would be instructed not to take the medications on their own and instead seek care. Clinicians would also  
101 inform patients about the warning signs of complications after taking mifepristone and misoprostol,  
102 including hemorrhage and infection, as well as how little or no bleeding could be a sign of ectopic  
103 pregnancy. This information should be provided both orally and in written format, including pointing  
104 patients to online resources. Patients could be encouraged to contact the clinician prior to taking the  
105 medications to confirm eligibility according to the no-test protocol and to answer questions.

106           Clinicians would instruct patients to monitor their pregnancy symptoms after taking the pills,  
107 expecting them to dissipate within approximately one week. Clinicians would also encourage patients to  
108 use a home urine pregnancy test 4-5 weeks after administering the medications to rule out ongoing  
109 pregnancy, including ongoing ectopic pregnancy. Similar to the no-test protocol,[11] patients that have a  
110 positive urine pregnancy test would be told to contact a healthcare provider to determine if additional  
111 evaluation is needed. Advance provision is envisioned as a complete care model, where the dispensing  
112 provider is committed to patient education, screening at the time of use over the phone or by telehealth,  
113 and ensuring patients access the necessary follow-up care in case of complications, ongoing pregnancy, or  
114 incomplete abortion.

115 **ARE PEOPLE INTERESTED IN RECEIVING ABORTION PILLS IN ADVANCE?**

116 A US nationally representative survey found that people are interested in alternative methods of  
117 obtaining medication abortion, including by advance provision.[35] In this national survey of 7,022 self-  
118 identified women age 18-49 (English- and Spanish-speaking), nearly half (44%) indicated they supported  
119 advance provision of medication abortion, and 22% reported being personally interested in the model.[35]  
120 Women who had previously had a medication abortion had over twice the odds (aOR, 2.39, 95% CI 1.51–  
121 3.79) of supporting advance provision compared to those who had never had an abortion.[35] Those who  
122 reported experiencing two or more barriers to accessing reproductive health care additionally had higher  
123 odds (aOR, 1.31, 95% CI 1.08–1.58) of support compared to those who had never experienced a barrier to  
124 accessing care.[35]

125 Almost half (48%) of survey respondents indicated advance provision could benefit women by  
126 facilitating abortion earlier in pregnancy.[35] Respondents’ concerns about advance provision included  
127 that people might take the pills incorrectly (55%), that people would not see a clinician before having the  
128 abortion (52%), and that the model could be less safe than the standard of care (42%).[35] It will be  
129 important to address these concerns with future research.

130 In this survey, people were more supportive of and interested in an advance provision model than  
131 they were of over-the-counter or online-access models of care.[35] One primary difference between  
132 advance provision and other alternative provision models is that advance provision ensures some face-to-  
133 face interaction with a health care provider at the time of dispensing, and a certain level of privacy that  
134 some people may prefer over other models, such as over-the-counter access in a pharmacy.

135 Advance provision may also fit the needs of those interested in a late period pill, where patients  
136 “bring back their period” by using a regimen of mifepristone and misoprostol without prior pregnancy  
137 confirmation.[36] One study found that those with prior abortion experience were more interested in a late  
138 period pill than those who had never had an abortion,[36] further supporting that those who have had a  
139 prior abortion may be potential candidates for advance provision.

140 **POTENTIAL CHALLENGES AND CONCERNS**

141 In many ways, the advance provision model is similar to the no-test medication abortion protocol.  
142 [11] Patients could be encouraged to contact their provider for a telehealth assessment to confirm  
143 eligibility according to the no-test protocol immediately before taking the medications. Despite the self-  
144 assessment for gestational age and ectopic risk, it is possible that some patients might use the treatment  
145 past 70 or 77 days' gestation or with an ectopic pregnancy. Evidence shows that mifepristone neither  
146 harms nor helps an ectopic pregnancy,[37] and the no-test protocol may facilitate quicker entry to care if  
147 a patient recognizes the relevant warning signs after taking medication abortion, such as having little or  
148 no bleeding. Research in the UK suggests that significant adverse events are not more common with the  
149 no-test protocol compared to in-person assessment with ultrasound, even though more patients with  
150 ectopic pregnancies may be diagnosed after starting treatment with the no-test protocol.[8]

151 Diversion of the medications to another person is also a possibility. If the person receiving the  
152 medications understands how to screen for appropriate use, the risk of harm is low – and might improve  
153 access to early abortion. This is an area that will require further discussion among clinicians, advocates,  
154 and legal experts to better understand the implications of medication diversion for prescribers and  
155 patients.

156 It is unlikely advance provision could be adopted in all US states. Barriers to adopting advance  
157 provision across the US include policy restrictions, such as mandatory ultrasound viewing laws, and other  
158 restrictions that require an in-person visit at the time of abortion. Even if advance provision is ultimately  
159 not widely scaled up, research on its safety and how patients can use the medications with limited  
160 clinician oversight could provide contributory evidence that would inform a future move toward over-the-  
161 counter (OTC) availability of mifepristone and misoprostol. As part of its original submission to the FDA  
162 requesting approval for OTC availability of levonorgestrel emergency contraception (EC) in 2003,  
163 Women's Capital Corporation submitted a literature review of eight articles assessing contraceptive  
164 behavior following advance provision of EC in addition to the required label comprehension and actual



165 use studies.[38] The FDA noted that “having an advanced provision would simulate the access that  
166 consumers would enjoy if the product were available OTC,” and recognized that these studies  
167 complemented the actual use study because they included young people and followed participants for a  
168 longer period of time.[38]

## 169 **CONCLUSION**

170           Despite these challenges and concerns, we see advance provision of medication abortion as an  
171 important addition to the menu of options people should have to access early abortion safely – and it is a  
172 model that patients are interested in.[35] Evidence of the considerable barriers patients face when  
173 accessing facility-based care [26, 27, 39,40] highlights the need to study advance provision, which will  
174 allow for a deeper understanding of whether it is worth further investment. Research aims of a future  
175 clinical trial should include measuring the proportion of eligible people who are interested in advance  
176 provision, and understanding the reasons behind their interest. Among study participants, key outcomes  
177 include the proportion of participants who use the medications, whether they contact a clinician before  
178 use, acceptability of the model, and clinical outcomes. Relevant clinical outcomes include effectiveness of  
179 medication abortion, adverse events, and the incidence and timing of diagnosis of ectopic pregnancy.

180           While a future landscape of medication abortion may include telemedicine and mail-order  
181 pharmacy dispensing, advance provision may be a preferable option for those who would continue to face  
182 barriers to care, including those traveling to areas with limited options for safe abortion. Advance  
183 provision of medication abortion pills could facilitate improved access to early abortion and should be  
184 rigorously studied.

Criteria prescreened by clinician at time of dispensing medications	Criteria self-assessed by patient at time of using medications†	
	Criteria	Mode of assessment
<ul style="list-style-type: none"> <li>• Does not report any of the following risk factors for ectopic pregnancy:               <ul style="list-style-type: none"> <li>○ Prior ectopic pregnancy</li> <li>○ Prior permanent contraception or other tubal surgery</li> <li>○ IUD in place</li> </ul> </li> <li>• Does not report a history of the following:               <ul style="list-style-type: none"> <li>○ Hemorrhagic disorder or currently taking anticoagulants</li> <li>○ Chronic adrenal failure</li> <li>○ Inherited porphyria</li> <li>○ Allergy to mifepristone or misoprostol</li> <li>○ Currently taking long-term corticosteroid therapy</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Pregnancy confirmation</li> </ul>	<ul style="list-style-type: none"> <li>• Home urine pregnancy test</li> </ul>
	<ul style="list-style-type: none"> <li>• Pregnancy location (i.e. assessment of ectopic pregnancy risk)</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to administering medication abortion: Should <u>not</u> ingest mifepristone and contact clinician immediately with presence of unilateral pelvic pain or significant bilateral pelvic pain within the past week or vaginal bleeding or spotting within the past week</li> <li>• After administering medication abortion: Should contact the clinician if experiencing symptoms consistent with ectopic pregnancy, such as little to no bleeding or unusual pelvic pain</li> </ul>
	<ul style="list-style-type: none"> <li>• Gestational duration</li> </ul>	<ul style="list-style-type: none"> <li>• Sure last menstrual period started <math>\leq 70</math> days before mifepristone ingestion ‡</li> </ul>
	<ul style="list-style-type: none"> <li>• Confirm that the conditions prescreened for at the time of dispensing have not developed in the interim</li> </ul>	<ul style="list-style-type: none"> <li>• Checklist of questions</li> </ul>

185 **Table. Timing of evaluation for contraindications to and eligibility for medication abortion with**  
 186 **advance provision of mifepristone and misoprostol\***

187

188 \* Screening criteria are based on the no-test protocol [11]

189 † Patients could be encouraged to contact the clinician to confirm eligibility before using medications

190 ‡ Clinicians could choose to use an upper limit of 77 days' gestation

191

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