



AMERICAN SOCIETY OF
PLASTIC SURGEONS®



THE PLASTIC SURGERY
FOUNDATION®

Executive Office

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January 29, 2021

The Honorable Shane E. Pendergrass, *Chair*
The Honorable Joseline A. Pena-Melnyk, *Vice Chair*
Room 241
203 House Office Building
Annapolis, MD 21401

RE: Oppose H.B. 219

Dear Chair Pendergrass and Vice Chair Pena-Melnyk:

On behalf of the Maryland Society of Plastic Surgeons (MSPS) and the American Society of Plastic Surgeons (ASPS), we are writing **in opposition to** H.B. 219. ASPS is the largest association of plastic surgeons in the world and represents more than 7,000 members and 94 percent of all board-certified plastic surgeons in the United States. In conjunction with MSPS, it represents 214 board-certified plastic surgeons in Maryland. Our mission is to advance quality care for plastic surgery patients and promote public policy that protects patient safety.

H.B. 219 would allow naturopaths – who are not physicians – to perform and oversee procedures that fall squarely within the practice of medicine. This is ill-advised. As surgeons, we encourage you to uphold the high level of patient care that has been established and allow the practice of medicine only by health care providers who meet appropriate education, training, and professional standards. Naturopaths should not be prescribing drugs or devices, as is outlined in the bill.

Our concerns with this existing expansion are compounded by other H.B. 219 mechanisms for further expanding the scope of naturopaths. Specifically, the bill adds that the Naturopathic Doctors Formulary Council is granted capabilities to attempt to expand the professions' scope to additional "common" office procedures as it sees fit. Non-medical professionals should not be determining what level of medical training is required to perform medical procedures.

State medical boards, including Maryland's, are comprised of physicians and given the authority to self-regulate their profession. That is because they are the highest authorities on the practice of medicine. Naturopaths are *not* the highest authorities on the practice of medicine, and as such should not be involved in medical scope decisions. The rationale is derived from the clear difference in training that physicians and naturopaths complete.

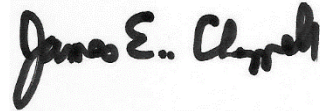
We must attain a core medical and surgical education while completing seven to ten years of training, which includes increasing responsibility and decision-making authority in the hospital setting. Board-certified plastic surgeons must: (1) earn a medical degree; (2) complete three to six years of full-time experience in a residency training program accredited by the Accreditation Council for Graduate Medical Education (ACGME); and (3) the last three years of training must be completed in the same program. Ultimately, surgeons will train as much as four-times-as-long as naturopaths.

We urge you to protect the citizens of Maryland from inadequately trained naturopaths by opposing H.B. 219 and preventing the inappropriate expansion of a naturopath's scope of practice. Thank you for your consideration of our position on this important issue. Please do not hesitate to contact Patrick Hermes, Director of Advocacy and Government Relations, at phermes@plasticsurgery.org or (847) 228-3331 with any questions or concerns.

Sincerely,



Joseph Losee, MD, FACS, FAAP
President, American Society of Plastic Surgeons



James E. Chappell, MD, FACS
President, Maryland Society of Plastic Surgeons

cc: Members, Health and Government Operations