

DATE: February 25, 2025

FROM: Reuben Reich, Rhode Island Dermatologist, President of the Rhode Island Dermatology Society

TO: RHODE ISLAND HEALTH AND HUMAN SERVICE COMMITTEE

SUBJECT: BILL H5351 – OPPOSITION STATEMENT

Dear Representatives on the HHS Committee,

I'm writing in opposition to Bill H5351 (Medical Aesthetics Practice Safety Act).

The American Medical Association (AMA) has worked to promote the betterment of public health since its inception in 1847. Lately, efforts have included enhancing patient safety through combating scope of practice creep. Nurse practitioners and physician's assistants are important members in the house of medicine but training programs between non-physicians and physicians are vastly different. Physicians' depth of training, hours of direct supervision during training and hand-on training with patients are unparalleled. 4 years of medical school with a minimum 3 years in residency remains the model for how patients expect their healthcare to be provided in America. The latest nationwide survey shows that 95% of patients prefer physician-led teams (AMA survey).

Adoption of Bill H5351, which is in opposition to the RI Department of Health's patient safety guidelines, would allow non-medical personnel to be trained through a 20 hour program that can be supervised by non-physicians to deliver procedures that carry substantial risks.

We live in an age of highly effective marketing and it is difficult for patients to know what procedures fall under aesthetics and what are truly medical and who should be administering said care. Countless studies have shown that patient care suffers when physician-led teams are not adopted. Many of these cosmetic procedures outlined in this bill are invasive and can have catastrophic outcomes even in the most capable of hands. As a senior cosmetic dermatologist stated during a talk at the annual American Academy of Dermatology meeting a few years back, "if you haven't yet had a vascular event administering filler, it is coming". Vascular events in the best situations lead to pain and skin necrosis and in the worst of situations lead to blindness and strokes. Training for this, ablative lasers and mid-deep chemical peels needs to be extensive to minimize risks to patients and are generally reserved for dermatology and plastic surgery residencies. When bad events occur they can happen quickly and having a provider on site who is aware of how to manage the event is a necessity. It is unfair not only to the patient but also to the administrator to be faced with the potential of causing a person serious harm by lack of appropriate training or support.

Most dermatologists I know do not offer fillers and do not perform ablative laser treatments. Even fewer administer mid-deep chemical peels and those that do offer these procedures are

experts and have had extensive training. As enhancing procedures are lucrative not only to the providers but also to the manufactures of the devices and products there is more pressure to expand access. I caution that as access expands, that it should be done within the auspices of a physician-led team to help mitigate risk and provide opportunities for enhanced, ongoing training. Allowing these procedures to be administered by non-medical personnel is not just risky but irresponsible.

I would strongly encourage following the Department of Health's guidance and to oppose this bill.

I greatly appreciate your time and consideration and the service that you are providing our community as legislators.

Warmest regards,

Reuben Reich