

Dear Clerk Steve Sepe ,

I am writing to express my strong support for Bill H-5351, which aims to establish reasonable and safe guidelines for the practice of aesthetic medicine in our state. As a pharmacist and a long-time patient at a medical spa, I am deeply concerned about the unintended consequences of the recently proposed guidelines by the Rhode Island Department of Health (RIDOH). These guidelines, while perhaps well-intentioned, reveal a significant misunderstanding of both the aesthetic medicine industry and the appropriate roles of medical professionals within it.

I have always received professional, safe, and natural-looking results from licensed Registered Nurses (RNs), Nurse Practitioners (NPs), and aestheticians in the medical spa setting. These providers are highly trained and experienced in aesthetic procedures, and their expertise ensures both safety and satisfaction. The personalized and welcoming atmosphere of medical spas is vastly preferable to the hurried and impersonal environment often found in dermatology offices. The proposed guidelines, however, threaten to disrupt this well-functioning model by imposing unnecessary and impractical restrictions.

As a pharmacist, I was particularly shocked to see that the RIDOH guidelines suggest it is within the scope of practice for pharmacists to administer Botox and fillers. While pharmacists possess an in-depth understanding of pharmacology and the rheology of fillers, we are not trained in the injection techniques necessary to safely and effectively perform these procedures. Suggesting otherwise is a fundamental misunderstanding of the pharmacist's role and training.

On the other hand, the guidelines impose unreasonable limitations on the scope of practice for PAs, NPs, RNs, and aestheticians—professionals who have been safely performing aesthetic procedures for years. Services such as Platelet-Rich Plasma (PRP) therapy, BroadBand Light (BBL) treatments, and Radiofrequency Microneedling (RFMN) have excellent safety profiles when performed by these skilled providers. Requiring physicians to perform these routine procedures is impractical and unnecessary, especially given the shortage of medical aesthetic physicians in our state. Additionally, the cost of these services will skyrocket, making them inaccessible to many patients.

It is important to note that procedures such as laser hair removal (LHR), BBL, and RFMN, which are safely delegated to trained professionals across the country, have been needlessly restricted under the proposed guidelines. For example, RNs, who have been industry leaders and trainers from the beginning, are suddenly being sidelined. Similarly, NPs, who are autonomous practitioners in this state and authorized to prescribe narcotics, are being told they cannot perform tattoo removal, BBL, PRP, bodysculpting, inkless stretch mark revision, and RFMN. This is not only illogical but also detrimental to the industry and the patients it serves.

If these restrictive guidelines remain in place, the consequences will be far-reaching. Prices will increase, businesses will close, and many skilled employees will lose their livelihoods. Furthermore, patients will seek services in neighboring states, effectively handing over a thriving industry to our competitors.

I urge you to consider the real-world implications of these guidelines and to support Bill H-5351 to protect access to safe and affordable aesthetic services in our state. By allowing trained and experienced PAs, NPs, RNs, and aestheticians to continue providing these services, we can ensure patient safety while maintaining the vibrancy of the aesthetic medicine industry.

Thank you for your attention to this critical matter.

Sincerely,

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