



February 22, 2025

Staci Fischer, MD
Board of Medical Licensure and Discipline
Rhode Island Department of Health
Three Capitol Hill, Providence, RI 02908

Dear Dr. Fischer,

It has come to the attention of the Rhode Island Dermatology Society (RIDS) that a bill has been submitted to the Rhode Island House of Legislation by a nursing consortium (which receives sponsorship from several pharmaceutical and laser companies) regarding cosmetic procedures (2025 H-5351). This bill has many concerns and contradictions to the July 2024 guidelines from your department (Rhode Island Department of Health Guidance Document Regarding the Operation of Medical Spas and Intravenous (IV) Therapy Businesses).

We want you to be aware that RIDS is in total opposition to Bill 2025 H-5351 for a variety of reasons with a few listed here:

- Classifying Cosmetic Procedures under one umbrella term (not specifying medical procedures)
 - Oversimplifies the risks – many of these treatments can lead to scarring, severe infection, blindness, stroke, and permanent nerve damage.
- Allowing Physician Assistants and Advanced Practice Nurse Practitioners to perform ablative lasers without physician supervision. These should only be performed by physicians.
 - These procedures are considered surgery and according to numerous medical societies including the American Medical Association, these should only be performed by physicians with training in that scope of practice.
- Allowing PAs and APRNs to now “supervise” non-physicians for any of these cosmetic procedures and have only “20 hours of training” (half a work week of non-specific training).
 - Completely unacceptable as residency training programs requires 100s to 1000s of hours of physician-supervised training for each specific entity.
 - This would allow non-physicians to perform surgical procedures.

Our society has spent the past eight years per the request of your Department of Health to assist with developing these guidelines to improve patient safety. We have based our advice not only on our own patients who have experienced harm from these medical spas, but more importantly numerous national publications citing high risks when these procedures are performed by non-physicians and when done in a non-medical facility. This bill puts our patients at risk at the expense of medical spas' monetary benefit and is against the standards of care for providing these elective procedures to patients who expect our state health department to have their safety at the forefront of determining the level under which non-physicians practice medicine.

We ask that you submit a letter to the Rhode Island Legislative House and Human Services Committee opposing this bill as it contradicts the guidelines your department recently published. This bill is scheduled to go before the committee on Tuesday February 25, 2025.

Sincerely,

The Executive Committee of the Rhode Island Dermatology Society