



AMERICAN SOCIETY OF
PLASTIC SURGEONS®



THE PLASTIC SURGERY
FOUNDATION®

Executive Office

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March 7, 2022

The Honorable Richard Hilderbrand, *Chair*
The Honorable Beverly Gossage, *Vice Chair*
Senate Committee on Public Health and Welfare
SW 8th & SW Van Buren St.
Topeka, KS 66612

RE: **Oppose Senate Bill 274**

Dear Chair Hilderbrand and Vice Chair Gossage:

On behalf of the American Society of Plastic Surgeons (ASPS), I am writing **in opposition to** Senate Bill 274. ASPS is the largest association of plastic surgeons in the world, representing more than 8,000 members and 93 percent of all board-certified plastic surgeons in the United States – including 87 board-certified plastic surgeons in Kansas. Our mission is to advance quality care for plastic surgery patients and promote public policy that protects patient safety.

S. B. 274 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.

Under the current version of S. B. 274, a naturopath – who is not an allopathic (MD) or osteopathic (DO) physician surgeon – can order and perform physical examinations; order imaging and diagnostic testing; administer subcutaneous, intravenous, or intramuscular substances; and most shockingly, perform minor office procedures. These procedures and modalities all fall squarely under the practice of medicine, and several are considered procedures that must be performed or delegated by a licensed physician surgeon. Yet, S. B. 274 expressly authorizes naturopaths who, again, are *not* medical doctors, full freedom to do them all.

Our concerns with that existing expansion are compounded by S. B. 274's mechanisms for further expanding the scope of naturopaths. Specifically, the bill creates a new board of naturopathy that is granted far too much authority. Non-medical professionals should not be determining what level of medical training is appropriate. State medical boards, including Kansas'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 authorized to make these kinds of decisions. The rationale is derived from the clear difference in training that physicians and naturopaths complete.

Surgeons 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 six to eight 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. The education and training of a naturopath is in no way comparable to that of a medical doctor, and it is dishonest to refer to naturopaths as “naturopathic doctors” or “naturopathic physicians”.

For the reasons listed above, we urge you to oppose S. B. 274. 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,

A handwritten signature in black ink that reads "J. Peter Rubin, MD". The signature is written in a cursive style with a large, stylized initial "J".

J. Peter Rubin, MD, MBA, FACS
President, American Society of Plastic Surgeons

cc: Members, Senate Committee on Public Health and Welfare