

December 21, 2017

The Honorable Carol McGuire, *Chairman*  
The Honorable John Sytek, *Vice Chairman*  
Committee on Executive Departments and Administration  
New Hampshire House of Representatives  
Legislative Office Building 306  
Concord, NH 03301

RE: **In opposition to H.B. 1606**

Dear Chairman McGuire and Vice Chairman Sytek:

I am writing on behalf of the American Society of Plastic Surgeons (ASPS) in opposition to H.B. 1606. ASPS is the largest association of plastic surgeons in the world, representing more than 7,000 members and 94 percent of all board-certified plastic surgeons in the United States. Our mission is to advance quality care for plastic surgery patients and promote public policy that protects patient safety.

H.B. 1606 would allow doctors of naturopathy to employ naturopathic assistants (NA) to *perform certain medical procedures and technical support services, including administering medication by intradermal, subcutaneous, or intramuscular injections*. Allowing naturopaths – who are not physicians – to perform and oversee procedures that fall squarely within the practice of medicine is ill-advised. As surgeons, we encourage you to uphold the high level of patient care that has been established and permit only licensed physicians who meet appropriate education, training, and professional standards to perform surgery.

New Hampshire RSA 328-E:4 states that naturopaths shall not<sup>1</sup>:

*Practice or claim to practice medicine and surgery, osteopathy, dentistry, podiatry, optometry, chiropractic, physical therapy, or any other system or method of treatment not authorized in this chapter.*

Furthermore, the American College of Surgeons' definition of surgery includes the following<sup>2</sup>:

*Injection of diagnostic or therapeutic substances into body cavities, internal organs, joints, sensory organs, and the central nervous system is also considered to be surgery (this does not include administration by nursing personnel of some injections, such as subcutaneous, intramuscular, and intravenous when ordered by a physician).*

Therefore, if a naturopath – who is not a physician surgeon – orders an intradermal, subcutaneous, or intramuscular injection, it would fall squarely under the definition of surgery. This would entail that

---

<sup>1</sup> Title XXX Occupations and Professions. Section 328-E:4 Scope of Practice.

<http://www.gencourt.state.nh.us/rsa/html/XXX/328-E/328-E-4.htm>. Accessed December 19, 2017.

<sup>2</sup> State of the states: Defining surgery. The Bulletin. <http://bulletin.facs.org/2012/05/state-of-the-states-defining-surgery>. Published June 6, 2016. Accessed December 19, 2017.

naturopaths and naturopathic assistants would both be acting outside of the scope of their training and experience.

Alarming, the New Hampshire Naturopathic Board of Examiners outlines the following as the lone educational requirement for initial licensure as a naturopath<sup>3</sup>:

*Graduate from a naturopathic medical college that is accredited by the Council on Naturopathic Medical Education or another such accrediting agency recognized by the federal government or graduate from a foreign country naturopathic medical college that possesses equivalent qualifications.*

Plastic surgeons go through drastically different training. 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.

In summation, allowing naturopaths to practice medicine without the requisite medical school and residency training – and to supervise naturopathic assistants outside of their scope of practice – would compound the risk to patient safety and lower the standard of surgical care in the state. Due to those potential patient safety issues, such as the possibility of complications arising from surgery and serious risk injury, it is critical that such procedures are performed by physician surgeons who have the comprehensive training and board certification to handle those complications when they do occur.

We urge you to protect the citizens of New Hampshire from inadequately trained naturopaths and naturopathic assistants by opposing H.B. 1606. 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](mailto:phermes@plasticsurgery.org) or (847) 228-3331 with any questions or concerns.

Sincerely,



Jeffrey E. Janis, MD, FACS  
President, American Society of Plastic Surgeons

cc: Members, New Hampshire House of Representatives Committee on Executive Departments and Administration

---

<sup>3</sup> Licensing Requirements. Licensing Requirements | Naturopathic Board of Examiners | Office of Professional Licensure and Certification. <https://www.oplc.nh.gov/naturopathic-examiners/licensing.htm>. Accessed December 19, 2017.