



AMERICAN SOCIETY OF  
PLASTIC SURGEONS®



THE PLASTIC SURGERY  
FOUNDATION®

Executive Office

444 East Algonquin Road • Arlington Heights, IL 60005-4664

847-228-9900 • Fax: 847-228-9131 • [www.plasticsurgery.org](http://www.plasticsurgery.org)

June 27, 2019

Office of Health Facilities, Licensing, and Certification  
Division of Health Care Quality  
c/o Corinna Getchell  
261 Chapman Road, Suite 200  
Newark, DE 19702

**RE: 16 DE Admin. Code 3335**

Dear Ms. Getchell:

I am writing on behalf of the American Society of Plastic Surgeons (ASPS) in support of the proposed amendments to 16 DE Admin. Code 3335, which would update Delaware's office-based surgery rules. 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 – including 17 board-certified plastic surgeons in Delaware. Our mission is to advance quality care for plastic surgery patients and promote public policy that protects patient safety.

Many ASPS member surgeons provide office-based surgery (OBS), and we therefore appreciate the division's commitment to improve existing policy in order to further protect patients. ASPS's commitment to patient safety is carried out in the Society's accreditation bylaw, which requires all board-certified plastic surgeons who perform surgery under certain levels of anesthesia in an office facility that is:

- Accredited by a national or state recognized accrediting agency/organization such as the American Association for Accreditation of Ambulatory Surgery Facilities, the Accreditation Association for Ambulatory Health Care or the Joint Commission on the Accreditation of Health Care Organizations;
- Certified to participate in the Medicare program under Title XVIII; or
- Licensed by the state in which the facility is located

We believe that facility accreditation provides the necessary oversight and standards to ensure that patients receive the safest surgical care. For the reasons outlined above, we strongly support the proposed changes to 16 DE Admin. Code 3335 as they reflect an improvement in policy that will increase patient safety in Delaware. 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,

Alan Matarasso, MD, FACS  
President, American Society of Plastic Surgeons