

February 21, 2023

The Honorable David Wilson, *Chair*  
The Honorable James Kaufman, *Vice Chair*  
Senate Health & Social Services Committee  
120 4<sup>th</sup> St.,  
Juneau, AK 99801

RE: **Oppose Senate Bill 44**

Dear Chair Wilson and Vice Chair Kaufman:

On behalf of the Northwest Society of Plastic Surgeons (NWSPS) and the American Society of Plastic Surgeons (ASPS), we are writing **in opposition to** S.B. 44. ASPS is the largest association of plastic surgeons in the world, and in conjunction with NWSPS, represents more than 8,000 members and 92 percent of all board-certified plastic surgeons in the United States – including 22 board-certified plastic surgeons in Alaska. Our mission is to advance quality care for plastic surgery patients and promote public policy that protects patient safety.

S.B. 44 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. 44, a naturopath – who is not an allopathic (MD) or osteopathic (DO) physician surgeon – can “perform procedures in the office using operative, electrical, or other methods, including the use of antiseptics and local anesthetics, for the surgical repair and care of superficial lacerations, abrasions, and lesions and the removal of foreign bodies located in the superficial tissues of the human body”. These procedures and modalities all fall squarely under the practice of medicine, and several are considered surgery that must be performed or delegated by a licensed physician surgeon. Yet, S.B. 44 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. 44’s mechanisms for further expanding the scope of naturopaths. Specifically, the bill creates a new Naturopathy Advisory Board 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 Alaska’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”.

Thank you for consideration of our comments. Please do not hesitate to contact Gabrielle Koenig, ASPS State Affairs Manager, at [gkoenig@plasticsurgery.org](mailto:gkoenig@plasticsurgery.org) or (317) 847-6115 with any questions or concerns.

Sincerely,



Gregory Greco, DO, FACS  
President, American Society of Plastic Surgeons



Emily Williams, MD  
President, Northwest Society of Plastic Surgeons

cc: Members, Senate Health & Social Services Committee