



**Pennsylvania Academy of
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Dermatologic Surgery**

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Dear Members of the House Professional Licensure Committee,

Access to dermatologic care is a critical component of healthcare, impacting both patient outcomes and overall well-being. As representatives of the Pennsylvania Academy of Dermatology and Dermatologic Surgery (PAD), we appreciate the opportunity to provide insights on improving access to healthcare, particularly within the realm of dermatology. Our comments encompass various topics, including scope-of-practice changes, telemedicine, physician payment issues, PBMs, truth in advertising, and the regulation of medical spas.

The PAD supports truthful, non-deceptive advertising by health care practitioners. The PAD strongly recommends the implementation of direct and concise regulations and enforcement against fraudulent, deceptive, or misleading advertising and strongly endorses transparency and disclosure of one's degree, field of study, board certification, and state licensure. America's patients deserve to know the licensure and qualifications of their health care providers. The PAD believes those who regulate and deliver medical care have an obligation to inform the public of the qualifications and limitations of their care prior to beginning treatment, and should identify or disclose their degree, field of study, board-certification (if any), and state licensure to each patient. This should be disclosed in all forms of advertisement, expressed when appropriate to each patient, and displayed prominently in writing in the provider's office.

Additionally, the regulation of medical spas requires attention to ensure patient safety and quality care. Medical spas offering dermatologic procedures must adhere to stringent guidelines, with procedures performed only by appropriately trained personnel under the supervision of a licensed physician. Transparency in advertising, including disclosure of credentials and qualifications, is vital to informing patients and promoting trust in healthcare providers.

The importance of a physician-led team in dermatology cannot be overstated, as it ensures the highest standards of patient care and safety. Dermatologists, as highly trained physicians specializing in skin health, possess the expertise needed to diagnose and treat a wide range of dermatologic conditions, including skin cancers and complex dermatoses. They lead interdisciplinary teams comprising non-physician clinicians, allied health professionals, and licensed personnel, coordinating efforts to deliver comprehensive and effective care to patients. This physician-led approach is essential for upholding patient safety and optimizing treatment outcomes, as it allows for careful oversight, expert decision-making, and timely interventions tailored to each patient's unique needs.

As advocates for patient safety and quality care, the PAD opposes the independent practice of nurse practitioners and physician assistants in dermatology. While these healthcare providers play valuable roles within the healthcare system, they should operate under the direct supervision of a board-certified dermatologist to ensure the highest level of patient care. Dermatologists have the specialized training and expertise necessary to lead clinical teams, make complex medical decisions, and perform intricate procedures safely and effectively. By maintaining a physician-led team-based approach, we can safeguard patient safety, uphold professional standards, and provide the best possible care for individuals seeking dermatologic treatment and services.



Physician workforce shortages, compounded by reimbursement cuts and ongoing challenges, threaten to reduce access to dermatologic care across the nation. The projected shortage of dermatologists, particularly in rural areas, raises concerns about meeting the growing demand for dermatologic services. Moreover, unsustainable Medicare physician reimbursement and escalating operating expenses further strain dermatology practices, jeopardizing patient access to care. We urge the committee to recognize the strain on practices of flat and declining Medicare physician payments and address regulatory challenges that hinder small physician practices.

The role of Pharmacy Benefit Managers (PBMs) in medication pricing and reimbursement requires increased transparency to mitigate conflicts of interest and ensure fair practices. Transparency in PBM operations, including disclosure of discounts and rebates, is essential to understanding their impact on formularies, tiers, and drug prices. Furthermore, regulatory oversight is necessary to prevent undue influence on medication access and affordability.

Telemedicine has emerged as a valuable tool for expanding access to dermatologic care, particularly in underserved areas. The PAD supports responsible expansion of telehealth services, emphasizing the importance of maintaining high standards of care and patient-provider relationships. Permanent integration of telehealth services post-pandemic could enhance access for rural communities and disabled patients, complementing traditional in-person care.

In conclusion, we appreciate the committee's dedication to addressing challenges in healthcare access. The PAD remains committed to collaborating with policymakers to advance initiatives that promote patient-centered care, uphold professional standards, and improve access to dermatologic services.

Thank you for your consideration of our perspectives on these critical issues. The PAD is open to setting up a future meeting where the top issues can be discussed in more detail for education either via Zoom or during our Advocacy Day on the Hill on May 8th, 2024 to learn more about the issues at hand.

If you have any additional questions or would like to set up a meeting, please contact Executive Director, Amy Blankenhorn (717-909-2681/ ablankenhorn@pamedsoc.org) or our lobbyist from McNeese-Winter Group, Natalie Cook (717-581-3740/ ncook@wintergroup.com).

Sincerely,

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