



February 17, 2015

The Honorable Terry B. Gerratana  
The Honorable Matt Ritter  
Co-Chairs, Joint Committee on Public Health  
Connecticut State Legislature  
Legislative Office Building, Room 3000  
Hartford, CT 06106

RE: SUPPORT HB 5625

Dear Co-Chairs Gerratana and Ritter:

On behalf of the Connecticut Dermatology and Dermatologic Surgery Society (CDS) and the American Society for Dermatologic Surgery Association (ASDSA), we are writing express our support for HB 5625, a measure to adopt a definition of surgery.

The definition proposed in HB 5625 is consistent with that adopted by both the American Medical Association and the American College of Surgeons. As included in HB 5625's proposed definition, CDS and ASDSA believe that the performance of any act or procedure that uses a biologic or synthetic material, or chemical application of any kind if it alters or damages or is capable of altering or damaging living tissue is surgery. Additionally, we believe that the performance of any act or procedure using a mechanical device, or displaced energy form of any kind if it damages or is capable of damaging living tissue is also surgery.

Such acts or procedures include, for example, the use of all lasers, light sources, microwave energy, electrical impulses, ultrasound energy, chemical application, particle sanding, the injection or insertion of foreign or natural substances, or soft tissue augmentation. Living tissue is any layer below the dead cell layer (stratum corneum) of the epidermis. The epidermis, below the stratum corneum, and dermis are living tissue layers. Certain FDA-approved Class I and II devices, by their intended or improper use, can damage below the stratum corneum. Therefore, their use and the diagnosis and treatment surrounding their use, constitutes surgery.

CDS and ASDSA strongly support HB 5625. Thank you for your consideration. Should you have any questions or need further information, please feel free to contact Debbie Osborn, CDS Executive Director, at 860 459-4377 or [debbieosborn36@yahoo.com](mailto:debbieosborn36@yahoo.com).

Sincerely,



Donna A. Aiudi, MD, President  
Connecticut Dermatology and  
Dermatologic Surgery Society

George J. Hruza, MD, President  
American Society for Dermatologic  
Surgery Association

cc: Katherine J. Duerdoth, CAE, Executive Director, ASDSA  
Lisle Thielbar, Director of State and Grassroots Advocacy, ASDSA  
Debbie Osborn, Executive Director, CDS  
Representative Prasad Srinivasan