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email: info@aacuweb.org • website: aacuweb.org

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August 11, 2022

Ms. Susan Gragg, Program Manager
Board of Naturopathy
Washington State Department of Health
P.O. Box 1099
Olympia, WA 98504-7844
susan.gragg@doh.wa.gov

RE: Reproductive Health Care in Naturopathic Practice

On behalf of the American Association of Clinical Urologists (AACU), I am writing to express our opposition to naturopathic physicians in providing vasectomies as a "minor in-office procedure". The AACU represents more than 3800 U.S. urologists, which includes many urologists in Washington. Our mission is to develop and advance health policy education as it affects urologic practice in order to preserve and promote the professional autonomy of its members and support the highest quality of care for patients.

We do not interpret the Board's definition of "minor office procedures" (RCW 18.36A.020) to allow for this procedure. A vasectomy is a surgical procedure that does not fall into the scope of practice of naturopaths and should not be classified as a minor office procedure as defined by the definition below:

(10) "Minor office procedures" means care and procedures incident thereto of superficial lacerations, lesions, and abrasions, and the removal of foreign bodies located in superficial structures, not to include the eye; and the use of antiseptics and topical or local anesthetics in connection therewith. "Minor office procedures" also includes intramuscular, intravenous, subcutaneous, and intradermal injections of substances consistent with the practice of naturopathic medicine and in accordance with rules established by the secretary.

A vasectomy usually takes 10 to 30 minutes, and your doctor will likely follow these steps:

- Numb the surgery area by injecting a local anesthetic into the skin of your scrotum with a small needle.
- Make a small cut (incision) in the upper part of your scrotum once the surgery area is numb, or make a small puncture in the scrotum instead of an incision.
- Locate the tube that carries semen from your testicle (vas deferens).
- Withdraw part of the vas deferens through the incision or puncture.
- Cut the vas deferens where it has been pulled out of the scrotum.
- Seal the vas deferens by tying it, using heat (cauterizing), surgical clips or a combination of methods. Then your doctor will return the ends of the vas deferens to the scrotum.
- Close the incision at the surgery area. Stitches or glue may be used. In some cases, the wound may be left to close on its own over time.

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Additionally, complications from this procedure are possible and require management by a urologist, who has the specialized training and education required to provide the best care and outcomes for vasectomy patients. Complications of vasectomy include hematoma formation, genito-urinary infection, sterilization failure, sperm granulomas, short-term postoperative pain (nodal pain, scrotal pain, and ejaculation pain), and chronic pain syndrome.

We want to emphasize that vasectomies are a very delicate procedure, and the complications can be extremely painful. If the naturopathic doctors wish to provide this type of service, they need to make their case before the state legislature.

Sincerely,

Damara Kaplan, PhD, MD
President
American Urological Association

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