



June 26, 2014

Mitchell H. Adcock, CPA, CIA, CFE, CPM
Deputy State Health Officer, Chief Administrative Officer
Mississippi State Department of Health
570 East Woodrow Wilson
P.O. Box 1700
Jackson, MS 39215-1700

Dear Mr. Adcock:

The American Osteopathic Association (AOA), the American Osteopathic College of Dermatology (AOCD) and the Mississippi Osteopathic Medical Association (MOMA) are writing to encourage you to amend the proposed Regulations for Tanning Facilities by the Office of Health Protection Division of Radiological Health. The proposed regulations would require a minor 14 years of age or older using an artificial tanning device at a tanning facility to provide a parent or legal guardian's written consent. Additionally, the proposed regulations would require the minor's parent or legal guardian to be physically present at the tanning facility the entire time the minor uses the tanning device. The AOA, AOCD and MOMA support imposing appropriate safety precautions and educational requirements upon tanning device operator, but believe that the proposed regulation does not go far enough in protecting the health of minors in Mississippi.

The AOA proudly represents its professional family of more than 104,000 osteopathic physicians and osteopathic medical students, promotes public health, encourages scientific research, serves as the primary certifying body for DOs, is the accrediting agency for osteopathic medical schools, and has federal authority to accredit hospitals and other health care facilities. The AOCD represents over 600 physicians, dermatology residents and student members. It is dedicated to improving the standards of the practice of dermatology, stimulating the study of dermatology and promoting understanding of the nature and scope of services rendered by osteopathic dermatologists. MOMA is a professional organization that represents nearly 450 osteopathic physicians practicing in Mississippi.

Tanning equipment works by bombarding the skin with ultraviolet (UV) radiation. Tanning salons use lamps that emit UV-A and UV-B radiation, both of which damage the skin and can cause skin

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cancer.¹ In 2009, the International Agency for Research on Cancer, a working group of the World Health Organization (WHO), classified UV-emitting tanning devices as a carcinogen, an agent known to cause cancer in humans.² In 2012, a study found that indoor tanning can cause the most common form of skin cancer, non-melanoma skin cancer, in addition to the deadliest form of skin cancer, malignant melanoma.³

While the AOA, AOCD, and MOMA appreciate the efforts of the Office of Health Protection Division of Radiological Health in regulating access to tanning facilities by minors, we believe additional steps should be taken to protect minors. Instead of allowing for parental consent, minors should be prohibited from using tanning devices in tanning facilities with no consent exceptions. The health risks that tanning devices pose to minors is too great to allow any potential regulatory loopholes.

Prohibiting minors from using tanning equipment is an effective means to protect them from the long-term health risks of these devices. Young people are at a heightened risk of developing skin cancer from indoor tanning, as they subject themselves to additional years of artificial UV exposure.⁴ For this reason, the WHO and the American Academy of Dermatology recommend banning the use of tanning devices by minors.⁵ States that have restricted access to indoor tanning for minors have seen stable or decreased rates of skin cancer, while states without these policies have seen an increase in the same.⁶

The use of tanning equipment by children is inappropriate and should be prohibited due to its long-term health effects. **We urge you to protect Mississippi's citizens from artificial UV exposure by amending the proposed regulations by the Office of Health Protection Division of Radiological Health for tanning to restrict all minors from accessing facilities.** Should you need any additional information, please feel free to contact Nicholas Schilligo, MS, AOA Director of State Government Affairs, at nschilligo@osteopathic.org or (800) 621-1773, ext. 8185.

Sincerely,



Norman E. Vinn, DO, MBA, FACOFP
President, AOA



Suzanne Rozenberg, DO
President, AOCD



W. Ashley Hood, DO
President, MOMA

¹ Food and Drug Administration, Indoor Tanning: The Risks of Ultraviolet Rays, May 11, 2010, *available at* <http://www.fda.gov/forconsumers/consumerupdates/ucm186687.htm>.

² IARC, Sunbeds and UV Radiation, July 7, 2009, *available at* http://www.iarc.fr/en/media-centre/iarcnews/2009/sunbeds_uvradiation.php.

³ Elizabeth Fernandez, Tanning Beds Linked to Non-Melanoma Skin Cancer, Oct. 2, 2012, *available at* <http://www.ucsf.edu/news/2012/10/12846/tanning-beds-linked-non-melanoma-skin-cancer>.

⁴ *See*, Jean-Francois Dore and Marie-Christine Chignol, Tanning Salons and Skin Cancer, *Photochem. Photobiol. Sci.* 11, 30-37 (2012).

⁵ Adam Riker, Nicolas Zea, and Tan Trinh, The Epidemiology, Prevention, and Detection of Melanoma, *The Ochsner Journal*, 10:56-65 (2010).

⁶ Dore, et al., *supra*.

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