



**Doug Ducey**  
Governor

**Joey Ridenour**  
Executive Director

## *Arizona State Board of Nursing*

1740 W. Adams Street, Suite 2000

Phoenix, AZ 85007

Phone (602) 771-7800

Website: [www.azbn.gov](http://www.azbn.gov)

An advisory opinion adopted by AZBN is an interpretation of what the law requires. While an advisory opinion is not law, it is more than a recommendation. In other words, an advisory opinion is an official opinion of AZBN regarding the practice of nursing as it relates to the functions of nursing. Facility policies may restrict practice further in their setting and/or require additional expectations related to competency, validation, training, and supervision to assure the safety of their patient population and/or decrease risk.

Within the Scope of Practice of  RN  LPN  APRN  
 Cosmetologist,  Esthetician,  Laser Technicians

**OPINION: MEDICAL ESTHETIC PROCEDURES BY NURSES**

**APPROVED DATE: 7/26/11**

**REVISED DATE: 1/13, 1/15, 03/19**

**ORIGINATING COMMITTEE:**

SCOPE OF PRACTICE COMMITTEE,

Advanced Practice Committee

BOARD OF COSMETOLOGY

BUREAU OF RADIATION CONTROL

### **ADVISORY OPINION**

## **MEDICAL AESTHETIC PROCEDURES PERFORMED BY LICENSED NURSES, LICENSED COSMETOLOGIST, LICENSED AESTHETICIANS AND CERTIFIED LASER TECHNOLOGISTS**

### **STATEMENT OF SCOPE**

The scopes outlined in this advisory opinion are in conjunction with the Arizona State Board of Cosmetology and the Arizona Bureau of Radiation Control. The Arizona State Board of Nursing does not have jurisdiction of other care providers other than what is include in the Nurse Practice Act. Questions related to other professions need to be referred to the appropriate regulatory board.

It is within the Scope of Practice of the registered nurse (RN), licensed practical nurse (LPN), Advanced Practice Registered Nurse (APRN), Cosmetologist, Aesthetician and Certified Laser Technologist (CLT) who can demonstrate the necessary education, knowledge, judgement, skills and licensure/certification, where applicable, to perform medical aesthetic procedures on the appropriate client population as defined in this opinion. Medical Esthetic procedures shall be performed under the supervision of a licensed independent practitioner (LIP) who has medical/surgical training and possesses specific knowledge, skills and abilities in medical esthetics/cosmetic procedures.

It is NOT within the scope of practice of the RN, LPN, Cosmetologist, Aesthetician or CLT to perform therapeutic medical procedures.

### **APRN SERVING AS MEDICAL DIRECTOR FOR AESTHETIC FACILITIES**

An APRN in accordance of state statutes and rules may assume responsibilities as a medical director, overseeing the care and treatment provided by APRN, RN's, LPN's, certified nursing

assistants and unlicensed personnel consistent with R4-19-101. Medical director responsibilities include but are not limited to:

- A. Provide health care services including prescribing and dispensing within the APRN's population focus and role. APRN R4-19-508 (C).
- B. APRN must maintain education, competency and certification for the procedures under the supervision of the medical director.
- C. The medical director provides guidance, leadership and training to staff.
- D. The medical director is responsible for review, approval and maintenance of written policy for all office procedures.
- E. Must be available to staff at any time during business hours.
- F. Must comply with state requirements for medical director role in outpatient facilities.

## **AESTHETIC PROCEDURES**

A three tiered system of classification based on risk to the patient is utilized to define the scope of practice for nurses and other healthcare professionals:

- A. Level I procedures are basic cosmetic/aesthetic in nature and do not require a licensed independent practitioner (LIP) order and indirect supervision, but require training and certification or licensure for the procedure being performed, as applicable. Informed consent is recommended.
- B. Level II procedures are intermediate in nature and require a LIP order, require indirect supervision (which includes a CLT performing hair removal). The CLT must have direct supervision for non-ablating treatment of the skin by the LIP. Specific training and certification or licensure for the procedure being performed is required, as applicable. Informed consent is required.
- C. Level III procedures are advanced aesthetic procedures and require specific training, clinical competence and certification or licensure for the procedure being performed, as applicable. These procedures shall be performed under the medical supervision of the LIP who has medical/surgical training and possesses specific knowledge, skills and abilities in medical aesthetics/cosmetic procedures. The specifically trained LIP is available for medical supervision by telecommunication methods for consultation and/or referral and is licensed in the state of Arizona where the patient is located. The specifically trained LIP must be able to assess a patient when requested by the nurse or patient within a medically reasonable timeframe. These procedures require an order issued by a specifically trained LIP and written informed consent.
  - LPNs with appropriate training can do level II procedures and certain level III procedures, but must have onsite supervision by a specifically trained RN or LIP as previously indicated. The assessment must be done by an RN or LIP with contributions provided by the LPN.

## **I. GENERAL REQUIREMENTS**

- A. Nurses, cosmetologists, aestheticians and CLTs who can demonstrate satisfactory completion of an instructional program and demonstrate clinical proficiency in each specific procedure are allowed to perform such medical aesthetic/cosmetic procedures. The person performing must have ongoing competency validation appropriate to the responsibilities; treatment provided and targeted patient population.
- B. A nurse, cosmetologist, aesthetician or CLT who provides medical aesthetic services shall have sufficient and appropriate training, continuing education specific to aesthetic procedures performed and supervision as required by this advisory opinion and be

currently licensed by the appropriate Board of Registration (Cosmetology or Nursing) and Arizona Department of Health Services Bureau of Radiation Control.

- i. Supervision by APRNs is defined by Arizona regulation R-4-19-101.
  - ii. Assignment and delegation of nursing activities of the RN is defined by Arizona regulation R-4-19-402.
  - iii. Supervision and training requirements for CLTs is defined by Arizona regulation, R-9-7-1438.
  - iv. Licensed Cosmetologists and Aestheticians in Arizona provide services for beautification. Licensees must work in a licensed establishment.
- C. The facility or practice setting, in accordance with state statutes and rules, maintains written policy, procedures or protocols, consistent with applicable standards and evidence based practice and approved by an LIP trained in medical aesthetics/cosmetics.
- D. Informed consent is obtained for medical aesthetic/cosmetic procedures.
- E. Only nurses, cosmetologists, aestheticians and CLTs who demonstrate satisfactory completion of an instructional program and demonstrate clinical proficiency in each specific procedure, are allowed to perform such medical aesthetic procedures.
- F. Documentation of satisfactory completion of an instructional program, supervised clinical practice and current licensure and/or certification, as applicable, is on file with the agency/employer.
- G. An order by a LIP is required to initiate Level II and III medical aesthetic procedures. Nurses may refer to Advisory Opinions Standing Order Protocols – Decision Support Tools and Orders: Accepting, Transcribing, Reviewing Orders.
- H. To the extent a product is regulated by the Federal Drug Administration (FDA) including compounding medications, the FDA regulations shall be followed. Products shall be used by individuals who are trained, certified and clinically proficient in their use.
- I. All lasers, radiofrequency devices and intense pulsed light equipment must be registered with the Arizona Department of Health Services Bureau of Radiation Control.

## **II. COURSE OF INSTRUCTION**

- A. Level I procedures: Nurses without a cosmetology training/license, shall only perform these procedures after successful completion of training and demonstrated competence in performing these functions.
- B. Level II and Level III procedures: Nurses shall perform these procedures after successful completion and demonstrated competence for performance of such procedures through a formal esthetic program and laser training school program and/or approved continuing medical or nursing education programs (e.g. CE or CME).
- C. Successful completion of training and demonstrated competency includes at a minimum:
- i. A comprehensive didactic component and a supervised practicum where each procedure is evaluated by a qualified practitioner who is duly licensed as a cosmetologist, nurse or physician, and possesses the credentials to provide education.
  - ii. A training course must include:
    - Knowledge & understanding of anatomy, physiology, pathophysiology regarding the integumentary system, as well as, other systems that may be specific to the procedure being performed.
    - Education related to cosmetic and dermatologic conditions, including education in biophysics and tissue interactions.
    - Proper technique for each procedure including safe use of product, device and/or equipment.

- Proper client selection, history taking, physical assessment parameters, indications and contraindications for treatment.
- Informed consent.
- Pharmacology including drug actions/interactions, side effects, contraindications and untoward effects.
- Proper selection, maintenance and utilization of equipment, as well as, OSHA and ANSI standards, as applicable to the device and/or modality.
- Adherence of the Arizona Department of Health Services Bureau of Radiation Control guidelines.
- Requires the student to demonstrate the ability to articulate realistic and expected outcomes of the procedure.
- Requires the student to demonstrate the ability to describe potential complications and side effects.
- Nursing care required and appropriate nursing preparation and interventions in the event of complications or untoward outcomes.
- Management of complications or adverse events.
- Infection control (e.g. sterile or strict aseptic technique when indicated).
- Safety precautions.

### **III. RATIONALE**

As the technology in aesthetic and/or cosmetics evolves, nurses, cosmetologists, aestheticians and CLTs are increasingly involved in such procedures. Many of the clinical competencies required to perform these procedures in a safe, effective manner are gained through the acquisition of additional education preparation and supervised clinical practice by LIPs with specialized training, skills, ongoing training, and knowledge in aesthetics/cosmetic procedures.

<b>LEVEL I – Cosmetic/Aesthetic procedures</b>	Nail Technician	Cosmetologist	Aesthetician	Laser Technician	LPN	RN	APRN*
<b>Superficial, non-invasive depth ONLY (does not pierce dermis), no to low risk for potential adverse event, informed consent</b>							
<b><i>Electricity Modalities</i></b>							
Galvanic Current – skin care only		X	X		X	X	X
Thermolysis – skin care only		X	X		X	X	X
Iontophoresis		X	X		X	X	X
Cryoelectrophoresis		X	X		X	X	X
Electrotherapy		X	X		X	X	X
Cathiodermic		X	X		X	X	X
Monopolar, bipolar (e.g. total body skin tightening)		X	X		X	X	X
<b><i>Ultrasound</i></b>							
Aesthetic procedures		X	X		X	X	X
Cavitation		X	X		X	X	X
<b><i>Heat Therapy</i></b>							
Saunas Thermolysis		X	X		X	X	X
<b><i>Mechanical Modalities</i></b>							
Exfoliation		X	X		X	X	X
Microdermabrasion		X	X		X	X	X
Dermaplane Exfoliation		X	X		X	X	X
Microneedling (maximum depth < 0.5mm)		X	X		X	X	X
Lymphatic Drainage		X	X		X	X	X
Cellulite Treatment /Non-invasive fat destruction		X	X		X	X	X
<b><i>Massage</i></b>							
Hand to elbow, foot to knee		X	X		X	X	X
Face (non-therapeutic)		X	X		X	X	X
Full Body Massage (non-therapeutic)		X	X		X	X	X
Full Body Wraps		X	X		X	X	X
<b><i>Topical Chemical Applications</i></b>							
Exfoliation		X	X		X	X	X
Chemical Peels (light depth)		X	X		X	X	X
Hair Coloring & Perming		X			X	X	X
<b><i>Light</i></b>							
Light Emitting Diodes (LED)		X	X		X	X	X
<b><i>Application of Cosmetic Preparations</i></b>							
Clean, manipulate & stimulate skin via facials, face masks, body wraps		X	X		X	X	X
Clean, manipulate & stimulate skin via paraffin wraps		X	X		X	X	X
<b><i>Depilation (Hair Removal – Mechanical)</i></b>							
Tweezing		X	X		X	X	X
Waxing		X	X		X	X	X
Threading		X	X		X	X	X
Sugaring		X	X		X	X	X
<b><i>Beautification</i></b>							
Dermablading		X	X		X	X	X
Eye lash enhancements (e.g. lash lift, lash extensions)		X	X		X	X	X
Manicures & Pedicures	X	X			X	X	X
Nail Care	X	X			X	X	X
Artificial Nails & Polish	X	X			X	X	X
Hair Dressing		X			X	X	X
Scalp Care (not including hair restoration)		X			X	X	X

<b>LEVEL IIA – Intermediate procedures</b>	Nail Technician	Cosmetologist	Aesthetician	Laser Technician	LPN	RN	APRN
<b>Non-superficial/superficial, non-invasive depths; marginal risk for adverse events, LIP order required; informed consent required</b>							
<b>Light</b>							
Photo Dynamic Therapy with ALA [aminolevulinic acid e.g. Levulan (Kerastick®)]		X	X		X	X	X
<b>Ultrasound</b>							
High Intensity Frequency Ultrasound (HIFU) (e.g. Ulthera®)		X	X		X	X	X
<b>Topical Chemical Applications</b>							
Chemical Peels (medium depth)		X	X		X	X	X

<b>LEVEL IIB – Intermediate procedures + laser certification*</b>	Nail Technician	Cosmetologist*	Aesthetician*	Laser Technician*	LPN*	RN*	APRN*
<b>Non-superficial/superficial, non-invasive depths; marginal risk for adverse events, LIP order required; informed consent required, laser certification and licensure for nurses, cosmetologists and aestheticians, equipment will be FDA labeled and approved by medical director</b>							
<b>Laser (e.g. Alexandrite, Diode, Ruby)</b>							
Non -ablative for hair removal only		X	X	X	X	X	X
Non –ablative for treatment of skin (refer to CLT certificate for specific approved treatments)		X	X	X	X	X	X
<b>Light</b>							
Intense Pulsed Light Therapy		X	X	X	X	X	X

<b>LEVEL III: Advanced Procedures</b>	Nail Technician	Cosmetologist	Aesthetician	Laser Technician	LPN	RN*	APRN*
<b>Varying depths and intensity; increased potential for adverse events; LIP order required; written informed consent required; requires pain management; laser certification, equipment will be FDA labeled and approved by medical director</b>							
<b>Laser &amp; Light</b>							
Laser – Total Ablative, Vaporizing, Laser resurfacing (e.g. CO <sub>2</sub> , Thulium®)						X	X
Vaginal rejuvenation (e.g. fractionated CO <sub>2</sub> , Erybium®, radiofrequency)						X	X
<b>Microwave Technology Devices</b>							
Hyperhidrosis (e.g. Miradry®, Mirasmooth®)						X	X
<b>Fractionated Laser</b>							
Ablative						X	X
<b>Cosmetic Injectables</b>							
Neuromodulators (botulinum exotoxins, e.g. Botox®)						X	X
Tissue/Dermal Fillers/Tissue Volumizers (e.g. Juvederm®, Restylane® or Sculptra®)						X	X
Sclerotherapy						X	X
Plasma Rich Injectables						X	X
Tissue Alteration of soft tissue (absorbable threads e.g. PDO, PLLA)						X	X
Injectable Fat Ablation (e.g. Kybella® or deoxycholic acid)						X	X
Small Volume Micronized Fat Transfer						X	X
<b>Mechanical</b>							
Surgical Dermabrasion						X	X
Microneedling (0.5 mm & greater)						X	X
Microchanneling (e.g. Dermafrac®)					X	X	X
Skin tag or benign skin lesion removal					X	X	X
<b>Medication Therapy</b>							
Hydration therapy/Vitamin Therapy						X	X

Hormone Pellets/Regenerative Medicine						X	X
Analgesic application of Nitrous Oxide for cosmetic/medical aesthetic procedures						X	X
<b>Other Modalities</b>							
Surgically Invasive Sustained High Temperature Radiofrequency (e.g. ThermiTight®)							X
Surgically Invasive Tissue Stabilized-Guided Subcision w/ Tumescent anesthesia (e.g. Cellfina®)							X

\*APRN R4-19-508. Standards Related to Registered Nurse Practitioner Scope of Practice (C). An RNP shall only provide health care services including prescribing and dispensing within the RNP’s population focus and role and for which the RNP is educationally prepared and for which competency has been established and maintained.

#### IV. REFERENCES

American Society for Laser Medicine & Surgery, Inc. (2012). Principles for non-physician use of laser and related technology. Retrieved from <http://www.aslms.org/for-professionals/professional-resources/standards-of-practic/principles-for-non-physician-use-of-laser-and-related-technology>.

Arizona Department of Health Services. (2018). Hair reduction and other cosmetic procedures using laser and intense pulsed light. Arizona Administrative Code, Title 9, Chapter 7, Article 1438.

Arizona Department of Health Services. (2014). Home health agencies. Arizona Administrative Code, Title 9, Chapter 10, Article 12.

Arizona Department of Health Services. (n.d.). Supervising prescribing health professional approval letter. A.R.S. §32-516. Retrieved from: <http://azdhs.gov/documents/licensing/radiation-regulatory/forms/laser-tech-supervising-prescribing-hp-approval-letter.pdf>.

Arizona Department of Health Services. (n.d.). Arizona revised statutes: Possession, use, administration, acquisition, sale, manufacture or transportation of prescription-only drugs, misbranded drugs ; classification; definition. A.R.S. §13-13-3406. Retrieved from: <http://codes.findlaw.com/az/title-13-criminal-code/az-rev-st-sect-13-3406.html>.

Arizona Department of Health Services. (2014). Arizona administrative code. Radiation Regulatory Agency. Title 12, Chapter 1. Retrieved from: <http://www.azdhs.gov/documents/licensing/radiation-regulatory/laser-tech/cosmetic-laser-tech-rules.pdf>.

Arizona State Board of Cosmetology. (n.d.) Revised statutes, Article 2: §32-510-518. Retrieved from <http://www.azleg.gov/ArizonaRevisedStatutes.asp?Title=32>.

Arizona State Board of Nursing. (2003). Advisory opinion: Anesthetic agents administered by registered nurses for limited purposes. Airway management or peripheral nerve block. Retrieved from: <https://www.azbn.gov/resources/advisory-opinions>.

- Arizona State Board of Nursing. (2011). Advisory opinion: Assessing patient/client conditions: The role of the registered nurse. Retrieved from: <https://www.azbn.gov/resources/advisory-opinions>.
- Arizona State Board of Nursing. (2014). Advisory opinion: Off label prescribing drugs, devices, and therapeutics. Retrieved from: <https://www.azbn.gov/resources/advisory-opinions>.
- Arizona State Board of Nursing. (2015). Advisory opinion: Nitrous oxide administration. Retrieved from: <https://www.azbn.gov/resources/advisory-opinions>.
- Arizona State Board of Nursing. (2016). Advisory opinion: Accepting, transcribing, reviewing orders. Retrieved from: <https://www.azbn.gov/resources/advisory-opinions>.
- Arizona State Board of Nursing. (2016). Advisory opinion: Dual profession and dual healthcare license/certification. Retrieved from: <https://www.azbn.gov/resources/advisory-opinions>.
- Arizona State Board of Nursing. (2017). Advisory opinion: Standing orders, protocols, pre-printed orders and order sets (also known as decision support tools). Retrieved from: <https://www.asbn.gov/resources/advisory-opinions>.
- Burton, R. (2017). Vaginal health and wellness: Vaginal laser therapy. *Plastic Surgical Nursing*, 37(2), 56-62.
- Dermatology Nurses' Association. (2013). Position statement: The nurse's role in the provision of cosmetic services. *Journal of the Dermatology Nurses' Association*, 5(5), 288.
- International Society of Plastic and Aesthetic Nurses. (2016). Position statement on informed consent. Retrieved from: <http://ispan.org/multimedia/files/position-statements/consent.pdf>.
- International Society of Plastic and Aesthetic Nurses. (2016). Position statement on injectables. Retrieved from: <http://ispan.org/multimedia/files/position-statements/injectables.pdf>.
- International Society of Plastic and Aesthetic Nurses. (2016). Position statement on laser. Retrieved from: <http://ispan.org/multimedia/files/position-statements/laser.pdf>.
- International Society of Plastic and Aesthetic Nurses. (2017). Position statement on managing noise and distraction in the plastic surgical setting. Retrieved from: <http://ispan.org/multimedia/files/position-statements/Noise-Distraction.pdf>.
- Justia US Law. (2015). *Teladoc, Inc. et al v. Texas Medical Board, et al*, No. 1:2015cv00343-document 80. Retrieved from: <https://law.justia.com/cases/federal/district-courts/texas/txwdce/1:2015cv00343/748757/80/>.



- Kentucky Board of Nursing. (2013). *Cosmetic and dermatological procedures by nurses*. Retrieved from <http://kbn.ky.gov/practice/Documents/aos35.pdf>.
- Montana Board of Nursing. (2016). Montana board of nursing recognized national professional organizations for APRN scope and standards of practice. Retrieved from: [http://boards.bsd.dli.mt.gov/Portals/133/Documents/nur/aprn\\_sop\\_documents.pdf](http://boards.bsd.dli.mt.gov/Portals/133/Documents/nur/aprn_sop_documents.pdf)
- Nebraska State Board of Nursing (2015). Advisory opinion: Cosmetic and dermatologic procedures. Retrieved from: <http://dhhs.ne.gov/publichealth/Licensure/Documents/CosmAndDerm.pdf>.
- New Hampshire Board of Nursing. (2016). Position statement and clinical practice advisories regarding the role of the RN/LPN in dermatology/cosmetic services. Retrieved from: <https://www.oplc.nh.gov/nursing/documents/dermatology-cosmetic.pdf>.
- North Carolina Board of Nursing. (2016). Cosmetic procedures: Position statement for RN and LPN practice. Retrieved from: <https://www.ncbon.com/myfiles/downloads/position-statements-decision-trees/cosmetic-procedures-aia-document.pdf>.
- North Dakota State Board of Nursing. (2014). Practice statements: Aesthetic cosmetic and dermatological procedures by licensed nurses. Retrieved from <https://www.ndbon.org/RegulationsPractice/PracticeStatements/Aesthetic-Cosmetic.asp>.
- Oregon State Board of Nursing. (2016). The registered nurse who participates in cosmetic procedures. Retrieved from: <http://www.oregon.gov/OSBN/pdfs/InterpretiveStatements/CosmeticProcedures.pdf>.
- Sahoo, A. (2009). Massachusetts medspa regulations. The Aesthetic Guide. Retrieved from [http://digital.miinews.com/display\\_article.php?id=160300&\\_width](http://digital.miinews.com/display_article.php?id=160300&_width).
- State of Arizona. (2018). House of representatives bill: Cosmetic laser procedures; direct supervision. HB 2378. Retrieved from: <https://hoc.az.gov/sites/default/files/2018/08/HB%202378%20Cosmetic%20Laser%20Procedure.pdf>.
- Texas Board of Nursing. (2012). Position statement 15.9: Performance of laser Therapy by RNs or LVNs. Retrieved from: [https://www.bon.texas.gov/practic\\_bon\\_position\\_statements\\_content.asp#15.9](https://www.bon.texas.gov/practic_bon_position_statements_content.asp#15.9).
- Texas Board of Nursing. (2014). Position statement 15.8: Nurses carrying out orders from advanced practice registered nurses. Retrieved from: [https://www.bon.texas.gov/practice\\_bon\\_position\\_statements\\_content.asp#15.18](https://www.bon.texas.gov/practice_bon_position_statements_content.asp#15.18).
- United States Food and Drug Administration. (2016). Prescription requirement under section 503A of the federal food, drug and cosmetic act: guidance for industry. Retrieved from <https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM49286.pdf>.

United States Food and Drug Administration. (2018). Dermal fillers: Soft tissue fillers. Retrieved from: <https://www.fda.gov/MedicalDevices/ProductsandMedicalProcedures/CosmeticDevices/WrinkleFillers/ucm2007470.htm>.

Washington State Nursing Care Quality Assurance Commission. (2004). Position statement: Administration of botox and the role of the licensed nurse. Retrieved from: <http://www.doh.wa.gov/portals/1/Documents/6000/AdminofBotox.pdf>.

Washington State Nursing Care Quality Assurance Commission. (n.d.). Position statement: Lasers in skin care treatment. Retrieved from: <http://www.doh.wa.gov/portals/1/Documents/6000/Lasers.pdf>.