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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.

OPINION: MEDICAL ESTHETIC PROCEDURES BY NURSES
APPROVED DATE: 7/26/11
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ORIGINATING COMMITTEE:
SCOPE OF PRACTICE COMMITTEE,
Advanced Practice Committee
BOARD OF COSMETOLOGY
BUREAU OF RADIATION CONTROL

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

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, judgment, 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

Some states have taken measures to define treatments so that they either automatically become medical treatments or are statutorily defined as non-medical treatments. Therefore, there can be a lot of confusion in this industry due to the "constant innovating technologies and techniques".

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 practitioner (LP) 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 LP 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 LP. 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 LP who has medical/surgical training and possesses specific knowledge, skills and abilities in medical aesthetics/cosmetic procedures. The specifically trained LP 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 LP 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 LP as previously indicated. The assessment must be done by an RN or LP 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. The protocols should provide detailed procedures in administering treatments and guidance on responding to adverse effects. Each of these policies, protocols and procedures must be approved by an LP who is trained and qualified in medical aesthetics/cosmetics procedures performed in the medical spa.
- D. Prior to any medical aesthetic treatment, an initial face-to face examination of the patient should be performed by a qualified LP. Telemedicine may be used for the initial exam provided it is performed
- E. Informed consent is obtained for medical aesthetic/cosmetic procedures.
- F. 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.
- G. 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.
- H. An order by a LP 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.
- I. 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.
- J. 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.

LEVEL I – Cosmetic/Aesthetic procedures	Nail Technician	Cosmetologist	Aesthetician	Laser Technician	LPN	RN	APRN*
Superficial, non-invasive depth ONLY (does not pierce dermis), no to low risk for potential adverse event, informed consent							
<i>Electricity Modalities</i>							
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
Cathodermie		X	X		X	X	X
Monopolar, bipolar (e.g. total body skin tightening)		X	X		X	X	X
<i>Ultrasound</i>							
Aesthetic procedures		X	X		X	X	X
Cavitation		X	X		X	X	X
<i>Heat Therapy</i>							
Saunas Thermolysis		X	X		X	X	X
<i>Mechanical Modalities</i>							
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
<i>Massage</i>							
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
<i>Topical Chemical Applications</i>							
Exfoliation		X	X		X	X	X
Chemical Peels (light depth)		X	X		X	X	X
Hair Coloring & Perming		X			X	X	X
<i>Light</i>							
Light Emitting Diodes (LED)		X	X		X	X	X
<i>Application of Cosmetic Preparations</i>							
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
<i>Depilation (Hair Removal – Mechanical)</i>							
Tweezing		X	X		X	X	X
Waxing		X	X		X	X	X
Threading		X	X		X	X	X
Sugaring		X	X		X	X	X
<i>Beautification</i>							
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

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

LEVEL IIB – Intermediate procedures + laser certification*	Nail Technician	Cosmetologist*	Aesthetician*	Laser Technician*	LPN*	RN*	APRN*
Non-superficial/superficial, non-invasive depths; marginal risk for adverse events, LP order required; informed consent required, laser certification and licensure for nurses, cosmetologists and aestheticians, equipment will be FDA labeled and approved by medical director							
Laser (e.g. Alexandrite, Diode, Ruby)							
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
Light							
Intense Pulsed Light Therapy		X	X	X	X	X	X

LEVEL III: Advanced Procedures	Nail Technician	Cosmetologist	Aesthetician	Laser Technician	LPN	RN*	APRN*
Varying depths and intensity; increased potential for adverse events; LP order required; written informed consent required; requires pain management; laser certification, equipment will be FDA labeled and approved by medical director							
Laser & Light							
Laser – Total Ablative, Vaporizing, Laser resurfacing (e.g. CO ₂ , Thulium®)						X	X
Vaginal rejuvenation (e.g. fractionated CO ₂ , Erybium®, radiofrequency)						X	X
Microwave Technology Devices							
Hyperhidrosis (e.g. Miradry®, Mirasmooth®)						X	X
Fractionated Laser							
Ablative						X	X
Cosmetic Injectables							
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 (<100ml) Micronized Fat Transfer						X	X
Mechanical							

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
Medication Therapy							
Hydration therapy/Vitamin Therapy						X	X

Hormone Pellets/Regenerative Medicine						X	X
Analgesic application of Nitrous Oxide for cosmetic/medical aesthetic procedures						X	X
Other Modalities							
Tumescent lidocaine infiltration for ambulatory procedures such as hyperhidrosis, ambulatory phlebectomy, and laser facial resurfacings.						X	X
Minimally invasive Sustained High Temperature Radiofrequency							X
Moderately Invasive Tissue Stabilized-Guided Subcision w/ Tumescent anesthesia (up to 4.5 mg/kg of lidocaine, up to 7 mg/kg lidocaine with epinephrine.							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.

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