

# Alaska State Medical Board

## Policies and Procedures

Board Issued Guidelines	Section 6
Subject:	<b><i>Guidelines for Physicians in Delegating Procedures to Non-physician Personnel When Performing Certain Dermatological Procedures</i></b>
Implemented:	January 16, 2004
Revised:	March 7, 2014; August 3-4, 2017

The Alaska State Medical Board has adopted the following to be its guideline to physicians licensed to practice medicine in Alaska when considering the delegation of certain procedures to non-physician office personnel.

### Non-Physician Practice of Medicine and the Use of Non-Physician Office Personnel

The guiding principle for all physicians is to practice ethical medicine with the highest possible standards. Physicians should be properly trained in all procedures performed to insure the highest level of patient care and safety. A physician should be fully qualified by residency training and preceptorship or appropriate course work. Training should include an extensive understanding of cutaneous medicine and surgery, the indications for each procedure, and the pre- and post-operative care involved in treatment. It is the position of the board that only active and properly licensed doctors of medicine and osteopathy shall engage in the practice of medicine. Unlicensed personnel are prohibited from providing services that are considered the practice of medicine.

Under the appropriate circumstances, a physician may delegate certain procedures to licensed non-physician health care practitioners (e.g., registered nurses, physician assistants, etc.). These procedures include administering a botulinum toxin or dermal filler, autotransplantation of biological materials, or treating with chemical peels below the dermal layer, or hot lasers. A physician may also delegate the performance of some non-invasive treatments to non-physician health practitioners (e.g., nurses, physician assistants, cosmetologists, estheticians, etc.) The physician must ensure that the non-physician health practitioners are appropriately trained and licensed, and are practicing within the scope of their own license.

Medical treatments require an initial consultation and supervision by a licensed physician. The treatments must be performed under direct supervision by the physician. The supervising physician shall be physically present on-site, immediately available, and able to respond promptly to any question or problem that may occur while the procedure is being performed. It is the physician's obligation to ~~insure~~ ensure that the non-physician health practitioners possess the proper training in cutaneous medicine, the indications for the procedure, and the pre- and post-operative care involved, and are provided with written protocols.

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There is a separate Board-issued guideline regarding the use of lasers. The Board adopted the AMA policy which defines laser usage and differentiates the appropriate use of ablative treatment (“hot laser”) and non-ablative treatment (“cold laser”).

Estheticians are prohibited from providing services that are considered the practice of medicine, such as injections, chemical peels, liposuction, autotransplantation, administering Botox or dermal fillers, or use of certain equipment (such as lasers, etc.) Procedures considered to be the practice of medicine may only be performed by a licensed physician.

Under Alaska law, a licensee may be sanctioned for intentionally or negligently permitting the performance of patient care by persons under the licensee’s supervision that does not conform to minimum professional standards even if the patient was not injured; in addition, it is considered unprofessional conduct to delegate professional practice responsibilities that require a license or permit to a person who does not possess the appropriate education, training, or licensure to perform the responsibilities.