Guidelines for Physicians in Delegating Procedures to Non-physician Personnel When Performing Certain Dermatological Procedures

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.

Under the appropriate circumstances, a physician may delegate certain procedures to certified licensed non-physician office personnel (e.g., nurses, physician assistants, or certified medical assistants). Specifically, the physician must directly supervise the non-physician office personnel to protect the best interests and welfare of each patient. The supervising physician shall be physician 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 that, with respect to each procedure performed, the non-physician office personnel possess the proper training in cutaneous medicine, the indications for the procedure, and the pre- and post-operative care involved.

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 under to a person who does not possess the appropriate education, training, or licensure to perform the responsibilities.