

October 21, 2024

To the members of the Medical Spa Services Work Group,

My name is Lindsay Trieweiler and I am a Certified Laser Technician (CLT) who completed my training at the National Laser Institute in 2013. I have kept my license active under the Arizona Radiation Regulatory Agency since moving to Alaska in 2019, despite the lack of a formal pathway to transfer my credentials to this state. I am passionate about the field of laser hair removal and am committed to ensuring that non-medical professionals like myself have the opportunity to pursue fulfilling careers as CLTs in Alaska.

I am reaching out to advocate for non-medical professionals to be eligible for certification and employment as Certified Laser Technicians in Alaska. I believe that well-trained individuals can perform laser hair removal safely and effectively without the need for a nursing degree or other medical qualifications. This position is rooted in my own experience, as the training I received was both comprehensive and specialized, equipping me with the knowledge to operate lasers safely and manage patient contraindications, while providing a quality service to the client.

The goal is to create reasonable pathways for certification that allow non-medical professionals to join this growing industry while upholding the highest standards of safety. By doing so, Alaska can expand job opportunities, support the local economy, and meet the increasing demand for laser hair removal services.

In support of this advocacy, I have provided a highly detailed document that outlines key information related to laser hair removal certification, the role of CLTs, and the broader industry regulations. Sections 1 through 13 of this document cover everything from the safety of laser hair removal to the need for more accessible certification programs. I hope this information will provide useful context as you consider updates to Alaska's regulations for the medical spa industry.

Thank you for your time and attention to this important matter. I appreciate your efforts to ensure that Alaska's medical spa regulations reflect the needs of both practitioners and the public. Please feel free to reach out if you have any questions or would like further insights.

Sincerely,

Lindsay Trieweiler

Lindsay Trieweiler

Certified Laser Technician

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1. What is Laser Hair Removal?

Laser hair removal is a cosmetic procedure that uses concentrated beams of light (laser) to remove unwanted hair. The process involves directing laser light at the hair follicles, where the pigment (melanin) in the hair absorbs the light, converting it into heat. This heat damages the follicle, inhibiting or delaying future hair growth. While it may not guarantee permanent hair removal, it significantly reduces hair regrowth, making it a popular long-term solution for managing unwanted hair.

How Laser Hair Removal Works:

1. **Light Absorption:** The laser emits light at a specific wavelength, targeting the melanin in the hair. Darker hair absorbs more light, making the procedure most effective for individuals with dark hair and light skin. Certain lasers do allow removal for persons with dark hair and dark skin.
2. **Heat Generation:** The light energy is converted into heat, which selectively heats the hair shaft and hair follicle, causing damage to the follicle while minimizing harm to surrounding skin.
3. **Hair Growth Cycle:** Hair grows in three phases—anagen (active growth phase), catagen (transition phase), and telogen (resting phase). Laser hair removal is most effective during the anagen phase when the hair is actively growing. Since not all hair is in this phase simultaneously, multiple sessions are required to target hair in the active growth stage.

Benefits of Laser Hair Removal

- **Long-term Hair Reduction:** While not completely permanent, laser hair removal drastically reduces hair regrowth, with some individuals experiencing permanent hair loss after multiple treatments.
- **Precision:** Lasers can selectively target dark, coarse hairs while leaving the surrounding skin undamaged.
- **Speed:** Each pulse of the laser takes a fraction of a second and can treat many hairs simultaneously. Small areas, like the upper lip, can be treated in less than a minute, while larger areas, such as the back or legs, may take up to an hour.
- **Fewer Ingrown Hairs:** Laser hair removal helps reduce ingrown hairs, a common issue with shaving, waxing, and plucking.

Common Treatment Areas:

Laser hair removal can be performed on almost any part of the body, including:

- Face (upper lip, chin, and sideburns)
- Legs
- Arms
- Underarms

- Bikini line
- Back
- Chest

Note: The procedure is most effective on individuals with light skin and dark hair because the contrast allows the laser to target the pigment in the hair without affecting the skin.

Technological advancements have allowed treatment for a wider variety of skin tones and hair types, but individuals with light hair (blonde, red, grey) may still find laser hair removal less effective, as there is less pigment in the hair to absorb the laser energy.

Procedure and Sensation:

The procedure itself involves several steps:

1. **Preparation:** Before the procedure, the target area is cleaned, and any remaining hair is shaved to ensure the laser can focus on the hair follicle beneath the skin.
2. **Laser Application:** The technician adjusts the laser settings according to the individual's skin type, hair color, and treatment area. Protective eyewear is used, and a cooling device or gel may be applied to protect the skin and increase comfort.
3. **Sensation During Treatment:** Most people describe the sensation during laser hair removal as feeling like a rubber band snapping against the skin. Some devices use cooling mechanisms to minimize discomfort. The sensation varies depending on the sensitivity of the area being treated and the individual's pain tolerance.

Post-Procedure Care:

- **Redness and Swelling:** Immediately after the treatment, the skin may appear red or swollen, similar to a mild sunburn. This typically subsides within a few hours.
- **Avoid Sun Exposure:** Treated areas should be protected from direct sunlight to avoid hyperpigmentation or irritation. Sunscreen should be applied diligently to treated areas.
- **Multiple Sessions Required:** Since hair grows in cycles, 6–8 sessions spaced 4–6 weeks apart are typically needed to achieve the best results. Maintenance treatments may be required over time, depending on hair regrowth.

Limitations:

While laser hair removal is highly effective, it has some limitations:

- **Hair Color:** The procedure works best on individuals with dark hair and light skin. The contrast allows the laser to better target the pigment in the hair follicle. Advances in laser technology have improved outcomes for people with darker skin, but the treatment is still less effective for those with light or grey hair due to the low levels of melanin.

- **Skin Types:** Different lasers are used depending on skin types (e.g., Alexandrite lasers for lighter skin types and Nd lasers for darker skin tones). A proper consultation is essential to ensure safety and efficacy for individuals with darker skin tones.
- **Multiple Sessions:** Complete hair reduction typically requires several treatments, as not all hair follicles are in the active growth stage during each session.

Citations:

American Academy of Dermatology Association. "Laser Hair Removal: What to Expect." AAD, Accessed October 2024.

Mayo Clinic. "Laser Hair Removal: Risks, Results, and What to Expect." [Mayo Clinic](#), Accessed October 2024.

2. CLT vs. Esthetician

Laser hair removal services can be provided by a variety of professionals, including Certified Laser Technicians (CLTs) and estheticians. While both roles involve performing cosmetic treatments to improve skin appearance, the key differences between them lie in their training, scope of practice, and the types of procedures they are licensed to perform.

Certified Laser Technician (CLT):

A **Certified Laser Technician (CLT)** specializes in performing laser-based cosmetic treatments, including but not limited to laser hair removal. Their primary focus is on procedures that use lasers or light-based devices to target specific skin and hair issues. Depending on the state and the regulations in place, CLTs may work independently or under the supervision of a medical professional, such as a dermatologist or plastic surgeon. In some states, CLTs may also require additional oversight by licensed medical providers, while in others, they can operate more autonomously.

Training and Certification:

- **Laser-Specific Training:** CLTs undergo specialized training that focuses solely on the use of lasers for cosmetic purposes, including laser hair removal, tattoo removal, skin resurfacing, and treatment of vascular conditions (e.g., spider veins).
- **Clinical Hours:** Most CLT programs require hands-on clinical experience with laser devices, ensuring technicians are comfortable using the technology and understanding the safety protocols.
- **Certification:** CLTs must receive certification from a reputable and accredited laser training program. This certification demonstrates competency in laser safety, techniques, and protocols.

Scope of Practice:

- CLTs are trained to use a variety of light and laser devices to treat hair, skin, and some cosmetic imperfections. Their expertise is focused specifically on laser technologies, including advanced devices like IPL (Intense Pulsed Light) and Nd lasers.
- They are capable of performing laser hair removal, tattoo removal, skin resurfacing, and photofacials, depending on their training and the regulations in their state.
- In some states, CLTs work under the supervision of a licensed medical professional, but their role is distinct from medical professionals in that they do not diagnose or treat medical conditions.

Key Responsibilities:

- Operate laser devices in a safe and effective manner.
- Assess the patient's skin type, hair color, and medical history to determine if they are suitable candidates for laser hair removal.
- Adjust laser settings for individual clients to ensure effective treatment and avoid skin damage.

- Ensure proper skin care before and after the procedure to reduce risks and enhance results.

Esthetician:

An **esthetician** is a licensed skincare professional who provides a wide range of cosmetic treatments focused on improving the appearance and health of the skin. While estheticians can specialize in laser hair removal, their primary focus is typically on non-laser treatments such as facials, exfoliation, and chemical peels.

Training and Certification:

- **General Skincare Training:** Estheticians undergo training in broader skincare treatments, including facials, chemical peels, microdermabrasion, and basic hair removal methods like waxing or sugaring. This training covers skin anatomy, skin conditions, and cosmetic treatments but typically includes little or no laser-specific education.
- **State Licensing Requirements:** Estheticians are licensed by state cosmetology or esthetic boards after completing a required number of training hours at an accredited esthetician school. Each state has its own licensing requirements, with the number of training hours ranging from 300 to 1,500 hours, depending on state regulations.
- **Additional Laser Training:** In some states, estheticians can perform laser hair removal, but they need to complete additional laser certification beyond their basic esthetician training. In other states, estheticians are not allowed to operate lasers at all without further medical or CLT credentials.

Scope of Practice:

- Estheticians primarily focus on cosmetic skin treatments such as facials, exfoliation, moisturizing treatments, and various forms of hair removal that don't require laser technology (e.g., waxing, threading).
- While some estheticians may pursue additional training to perform laser hair removal, it is not typically included in their core education.
- In states that allow it, estheticians who have received additional certification may perform laser hair removal, but their focus remains on overall skin health and non-invasive skincare treatments.

Key Responsibilities:

- Perform non-laser skincare treatments like facials, chemical peels, and waxing.
- Provide consultations to clients to assess skin conditions and recommend appropriate treatments.
- Advise clients on post-treatment skincare and how to maintain the health of their skin.
- In states where laser hair removal is permitted for estheticians, they may offer this service after completing specialized training.

Key Differences Between CLTs and Estheticians:

Aspect	Certified Laser Technician (CLT)	Esthetician
Primary Focus	Laser-based cosmetic procedures (laser hair removal, tattoo removal, skin treatments)	General skincare treatments (facials, peels, waxing)
Training	Specialized training in laser technologies and safety	General skincare training, laser training optional/extra
Certification	Requires certification from accredited laser training programs	Requires state esthetician license, optional laser certification
Scope of Practice	Operates various laser devices for hair and skin treatments	Performs non-laser skincare treatments; laser hair removal only with additional certification
Supervision Requirements	May require supervision by a medical professional, depending on state regulations	Often works independently in salons, but may require medical oversight for laser procedures
Allowed Procedures	Laser hair removal, tattoo removal, skin resurfacing	Facials, chemical peels, waxing, limited laser treatments (with certification)

Overlap and Complementary Skills:

- In some cases, CLTs and estheticians may collaborate in clinics or med spas. Estheticians may handle skincare consultations, recommending clients to CLTs for laser-based treatments, while focusing on non-laser procedures themselves.
- Estheticians who gain additional laser training can expand their services to include laser hair removal, giving them more versatility in their practice.

Regulatory Differences by State:

- Some states regulate laser hair removal strictly and require CLTs to work under medical supervision (e.g., dermatologists or physicians). Other states allow licensed estheticians to perform laser hair removal after additional training, creating variability in the practice across the U.S.

This distinction between CLTs and estheticians highlights how each profession has its own strengths and limitations but it should be noted that it is not a requirement for a CLT to be an esthetician to perform laser hair removal and both professions are required to get additional training specific to laser hair removal.

Citations:

American Med Spa Association. "Laser Hair Removal Regulation by State." AmSpa, Accessed October 2024.

National Laser Institute. "What is a Certified Laser Technician?" National Laser Institute, Accessed October 2024.

3. State Requirements (Lower 48)

In the United States, the requirements to perform laser hair removal vary significantly by state. While some states have strict regulations, including requirements for medical supervision or licensure, the vast majority of states **do not** require practitioners to be registered nurses (RNs) or have a nursing degree to become a Certified Laser Technician (CLT). In most cases, CLTs can operate under specific certifications without needing medical qualifications, so long as they have undergone appropriate laser training. Here's a detailed breakdown to support this assertion:

States That Do Not Require a Nursing Degree for CLTs:

- **Arizona:** In Arizona, a CLT can perform laser hair removal under the supervision of a licensed medical director but does not need to be a nurse. CLTs must complete an accredited laser training program and meet state-specific requirements set by the Arizona Radiation Regulatory Agency.
- **Texas:** Texas allows estheticians, cosmetologists, and CLTs to perform laser hair removal with appropriate certification. No nursing degree is required.
- **Nevada:** Nevada states that licensed estheticians and cosmetologists can perform laser hair removal without being registered nurses. They need to complete specialized laser training.
- **Colorado:** In Colorado, a professional (such as a doctor or nurse) must supervise the use of lasers, but the technician does not need to be a nurse. Certified Laser Technicians can work under supervision with the appropriate training.
- **Florida:** In Florida, laser hair removal performed by a CLT under the direct supervision of a licensed medical professional, but the technician does not need to hold a nursing degree. Estheticians and cosmetologists can also provide laser services if properly trained.
- **New York:** New York requires that laser hair procedures be performed under the supervision of a physician, but again, it does not mandate that the laser operator be a nurse.

Other States with No Specific Nursing Requirement:

In many states, there are **no specific requirements** for CLTs to hold a nursing degree. The focus is on completing accredited laser training and obtaining a certificate from a reputable institution. For example:

- **Illinois**
- **Georgia**
- **Michigan**
- **Ohio**
- **Pennsylvania**
- **North Carolina**

States Requiring Medical Supervision (But Not Nursing Credentials):

In a number of states, regulations stipulate that laser hair removal be performed under medical supervision (such as under a physician or other licensed medical professional), but the technician handling the laser does not need to be a nurse. Examples of these states include:

- **Massachusetts:** CLTs must work under the supervision of a licensed physician, but the operators themselves do not need to be nurses.
- **Virginia:** Like Massachusetts, Virginia requires physician oversight not mandate that CLTs hold nursing qualifications.

States That Require a Nursing Degree:

While the vast majority of states do not require a nursing degree to perform laser hair removal, a few do have stricter regulations. These states are exceptions rather than the norm:

- **New Jersey:** New Jersey requires that laser hair removal procedures be performed by licensed medical professionals, including registered nurses or physician assistants, under the supervision of a physician.
- **Oregon:** In Oregon, licensed nurses or other medical professionals must perform laser.
- **California:** California only allows nurses to perform laser hair removal after they have completed appropriate training.

Conclusion:

The data strongly support the point that most states do not require a nursing to perform laser hair removal. Instead, the majority of states focus on ensuring that laser operators, such as CLTs, have completed appropriate training and operate under some form of medical oversight or within state-specific regulations. These requirements are generally designed to ensure safety without limiting the field to medical professionals, which would restrict access to the profession and limit job opportunities for non-medical practitioners. By allowing trained, non-nursing professionals to perform laser hair removal, states ensure the expansion of the cosmetic industry, making it accessible for more people while maintaining high safety standards. This is an essential point when advocating for maintaining clear and accessible certification paths for CLTs without imposing unnecessary nursing requirements.

Citations:

American Med Spa Association. "Laser Hair Removal Regulation by State." AmSpa, Accessed October 2024.

Texas Department of Licensing and Regulation. "Laser Hair Removal Program." TDLR, Accessed October 2024.

California Board of Barbering and Cosmetology. "Laser Services in California." [BBC](#), Accessed October 2024.

Nevada State Board of Cosmetology. "Esthetician Licensing and Laser Hair Removal." NSBC, Accessed October 2024.

Colorado Office of Barber and Cosmetology Licensure. "State Laser Hair Removal Regulations." CO, Accessed October 2024.

Florida Department of Health. "Laser Hair Removal Guidelines." [FL DOH](#), Accessed October 2024.

New York State Department of Health. "Laser Hair Removal." NY DOH, Accessed October 2024.

Massachusetts Office of Consumer Affairs and Business Regulation. "Laser Hair Removal Regulation." [MA](#), Accessed October 2024.

Virginia Department of Professional and Occupational Regulation. "Laser Hair Removal Requirements." VDPOR, Accessed October 2024.

New Jersey State Board of Medical Examiners. "Laser Regulations." [NJ](#), Accessed October 2024.

Oregon Health Licensing Office. "Laser Hair Removal Licensure." Oregon HLO, Accessed October 2024.

4. Certification

Certification is a crucial step for anyone looking to become a Certified Laser Technician (CLT). Reputable laser training programs ensure that technicians are well-versed in the technology, safety protocols, and techniques required to perform procedures like laser hair removal effectively. Among the many institutions offering laser certification, the National Laser Institute (NLI) is widely considered the gold standard for training. This section covers the certification process, including the training hours, duration, and cost of becoming a CLT.

National Laser Institute (NLI) Certification:

The National Laser Institute is one of the leading training institutions for laser and medical aesthetics, and it provides comprehensive education for individuals seeking certification as a CLT. Their program is recognized across the United States for its high standards in laser safety, hands-on training, and in-depth theoretical knowledge.

Training Hours:

NLI's laser certification program includes a combination of didactic (classroom) instruction and clinical hands-on training. The training consists of **40 hours of didactic training**, during which students learn about the physics of lasers, skin anatomy, laser safety, and the specifics of various laser treatments, including hair removal, tattoo removal, and skin rejuvenation.

Hands-On Clinical Training:

The program also includes **24 hours of clinical hands-on training**, where students get to operate laser devices on real clients under the supervision of experienced instructors. This training ensures that technicians are confident and competent in the safe operation of laser technology.

Total Duration:

The full certification program typically takes **7 to 14 days** to complete, depending on the specific course schedule and whether the program is taken in-person or as a combination of online and in-person learning. This condensed schedule allows participants to enter the workforce quickly without sacrificing the depth of education.

Program Cost:

The cost of the National Laser Institute's comprehensive laser certification program can range from **\$10,000 to \$15,000** depending on whether additional medical aesthetics training (such as for injectables or skin care) is included in the package. For those focusing solely on laser certification, the base cost is typically around **\$10,000**.

Importance of a Reputable Trainer:

Choosing a reputable institution like NLI is critical because it ensures the technician receives quality training that adheres to industry standards. Accredited programs provide students with the necessary knowledge of laser safety and usage, which is essential in avoiding accidents or mishaps that could harm clients. Completing training from an accredited program not only opens doors for employment but also instills confidence in potential clients and employers.

National Standard:

The need for a national standard in laser certification is important to ensure consistency across states. While individual states may have varying regulations regarding laser hair removal, a certification from a recognized institution like NLI serves as a benchmark for quality and safety across the country. This helps bridge gaps between differing state laws and ensures that all certified technicians meet a high level of proficiency in laser technology.

Citations:

National Laser Institute. "Laser Hair Removal Certification: Course Overview." NLI, Accessed October 2024.

American Med Spa Association. "Laser Hair Removal Training and Certification." AmSpa, Accessed October 2024.

5. Who Oversees CLTs & Scope of Practice

Certified Laser Technicians (CLTs) are typically overseen by medical professionals in many states, but contrary to some misconceptions, it is **not necessary** for a medical provider to be physically present in the building while a CLT is operating. In most states, CLTs can operate lasers for procedures like laser hair removal under what is known as "**indirect supervision**" or "**delegated authority**" from a medical provider. This means that as long as the medical provider has established protocols and remains available for consultation, they do not need to be physically on-site while the CLT performs the procedure.

Indirect Supervision of CLTs:

In states that allow CLTs to operate under indirect supervision, the medical provider, such as a dermatologist or a physician, delegates the task of performing laser treatments to a trained CLT. The medical provider is responsible for overseeing the overall safety and quality of care, but the CLT can work independently within the clinic or med spa without requiring the medical provider to be present. CLTs can own their own businesses and hire a medical director, they do not have to work under a medical director's office.

The **indirect supervision** model allows CLTs to perform laser hair removal and other non-invasive treatments without requiring the physician or nurse to oversee every treatment in person. This arrangement is common in the cosmetic industry, particularly in med spas and dermatology offices, where licensed professionals delegate routine procedures to trained technicians.

States That Allow CLTs to Operate Without On-Site Medical Supervision:

- **Arizona:** In Arizona, CLTs can perform laser treatments under the supervision of a medical director, but the director does not need to be present at the location. The medical provider must ensure that proper protocols are in place, and the CLT must be certified and competent to perform the treatments independently.
- **Texas:** Texas regulations allow CLTs to work under indirect supervision of a licensed medical professional. The physician is required to establish treatment protocols and provide oversight, but they do not need to be on-site while the laser treatments are performed.
- **Nevada:** In Nevada, as long as the supervising physician has delegated authority to the CLT and the technician has the proper training and certification, the medical provider does not need to be physically present in the facility during laser treatments.
- **Florida:** In Florida, CLTs can operate laser equipment under the indirect supervision of a physician. The physician must be available for consultation but does not need to be in the room or building during the procedure.
- **California:** While California requires laser hair removal to be performed under physician supervision, the supervising physician does not need to be physically on-site. Instead,

they delegate the procedures to CLTs, provided the technicians follow established protocols and have the necessary certification.

Responsibility of Medical Providers:

In all these states, the supervising medical provider is responsible for establishing treatment protocols, ensuring the CLT is properly trained and certified, and being available for any questions or complications that may arise during treatment. They do not need to supervise the day-to-day operations of the CLT directly but must be involved in overseeing the clinic or med spa's safety standards.

Benefits of Indirect Supervision:

- **Increased Accessibility to Treatments:** Allowing CLTs to work without constant on-site supervision increases access to cosmetic laser treatments for clients, especially in high-demand settings such as med spas and dermatology clinics.
- **Reduced Overhead for Clinics:** Clinics and med spas can operate more efficiently when CLTs perform procedures without requiring a medical provider to be present. This helps lower operating costs and enables medical providers to focus on more complex tasks.
- **Expanding the Role of CLTs:** The indirect supervision model expands the scope of practice for CLTs, allowing them to take on more responsibility in delivering cosmetic treatments.

Importance of Proper Certification and Protocols:

While states that allow indirect supervision empower CLTs to perform laser hair removal without the medical provider being on-site, it's critical that the CLT receives **proper training** and adheres to **established safety protocols**. Certification from reputable institutions like the National Laser Institute ensures that CLTs are competent and confident in performing laser treatments safely and effectively.

Citations:

National Laser Institute. "State Regulations for Laser Technicians." NLI, Accessed October 2024.

Texas Department of Licensing and Regulation. "Laser Hair Removal Program." TDLR, Accessed October 2024.

Arizona Radiation Regulatory Agency. "Certified Laser Technicians Supervision Guidelines." [ARRA](#), Accessed October 2024.

Nevada State Board of Cosmetology. "Supervision Requirements for Laser Technicians." NSBC, Accessed October 2024.

Florida Department of Health. "Laser Hair Removal Supervision Guidelines." [FL DOH](#), Accessed October 2024.

California Board of Barbering and Cosmetology. "Laser Hair Removal Regulations in California." [BBC](#), Accessed October 2024.

6. Barriers to Entry in Alaska's Laser Hair Removal Industry

Alaska is often noted for its **limited workforce** and is considered by many to be "behind the times" when it comes to implementing the latest trends in the beauty and wellness industries, including laser hair removal. Despite this, there is a growing demand for laser hair removal in the state, as more individuals seek out convenient and long-lasting solutions for unwanted hair. The challenge is finding a balance between creating enough regulation to ensure safety and quality while not establishing overly restrictive barriers that hinder the growth of the industry.

Alaska's Workforce Challenges:

- **Limited Workforce:** Alaska faces unique challenges in maintaining a robust workforce in the beauty and wellness industry. The state's vast geography, smaller population, and remote locations make it difficult to attract and retain skilled professionals.
- **Behind the Times:** Alaska has often been perceived as being slow to adopt modern cosmetic practices. While the demand for procedures like laser hair removal is increasing, the regulatory framework and workforce have not always kept pace with that demand.
- **Growing Need for Laser Hair Removal:** Despite workforce limitations, there is a clear demand for laser hair removal services. Clients in Alaska want access to the same high-quality services that are easily available in other parts of the country.

Creating Reasonable Barriers:

While **safety is paramount**, Alaska must avoid establishing unnecessary barriers that prevent trained professionals from entering the laser hair removal market. Currently, the state has restrictions that, in many cases, limit non-medical professionals from operating laser equipment. This has led to an undersupply of available practitioners, leaving clients underserved.

To address this, Alaska should consider implementing **reasonable barriers** that emphasize proper training without requiring a medical license or nursing degree to perform laser hair removal.

Why Creating Barriers Is Harmful:

- **Restricting Market Entry:** When barriers to entry are too high—such as requiring only medical professionals (e.g., nurses or physicians) to perform laser hair removal—many potential CLTs are kept out of the industry. This stifles job growth and limits the number of available technicians, further straining an already limited workforce.
- **Delaying Industry Growth:** Overly strict regulations prevent Alaska's laser hair removal market from growing in response to demand. If only a select few are allowed to operate laser hair removal devices, it limits accessibility and raises prices, ultimately slowing the state's ability to meet the evolving needs of its population.
- **Economic Realities in Alaska:** While laser hair removal can be a lucrative service, Alaska's relatively small population does not create a demand that would support full-

time positions for many practitioners. For nurses who already have full-time jobs in more essential healthcare roles, transitioning into laser hair removal—particularly in such a niche market—may not be financially viable. As a result, even if nurses are trained to perform the procedure, they are unlikely to leave secure full-time jobs to provide part-time cosmetic services. This creates a shortage of available practitioners, making the service inaccessible to many Alaskans. A full career transition can also leave medical establishments shorter on nurses than they already are.

The Case for Reasonable Barriers:

While there should be safeguards in place to prevent unqualified individuals from practicing laser hair removal, requiring non-medical professionals to complete a renowned training program like the one offered by the National Laser Institute (NLI) is a reasonable barrier. The NLI program requires extensive training in laser safety, techniques, and hands-on experience, ensuring that graduates are fully capable of operating laser equipment safely and effectively. By focusing on proper certification rather than medical licensure, Alaska could open up the market to qualified CLTs, without sacrificing safety or quality.

NLI as a Standard for Certification:

The National Laser Institute's Certified Laser Technician program is the gold standard for laser hair removal training. With **40 hours of didactic education** and **24 hours of clinical hands-on training**, the program ensures that graduates are highly trained in the use of laser technologies, including hair removal, skin resurfacing, and tattoo removal.

By adopting training requirements that align with NLI's rigorous standards, Alaska can:

- Ensure that all laser hair removal technicians meet national safety and quality benchmarks.
- Increase the pool of qualified professionals entering the workforce.
- Allow non-medical professionals to work in the industry, thus expanding access to services.

Balancing the Needs of Safety and Accessibility:

While it is essential to prevent untrained individuals from entering the marketplace, Alaska can still allow non-medical professionals to operate within the industry by setting standards for certification and competency rather than medical licensure. This will:

- **Enhance industry growth:** More certified CLTs would enter the market, creating jobs and expanding service availability.
- **Support consumer demand:** Alaskans seeking laser hair removal services would no longer need to rely on a limited number of providers.
- **Maintain safety standards:** By ensuring that technicians are certified through reputable programs, the state can maintain high safety standards without unnecessary medical barriers.

Citations:

National Laser Institute. "Laser Hair Removal Certification: Course Overview." NLI, Accessed October 2024.

Alaska Department of Labor and Workforce Development. "State Workforce Data and Trends." Alaska DOL, Accessed October 2024.

American Med Spa Association. "State Regulations for Laser Hair Removal." AmSpa, Accessed October 2024.

7. Becoming a CLT in Alaska: Commitment and Challenges

For individuals in Alaska who wish to pursue a career as a Certified Laser Technician (CLT), there are significant hurdles, primarily because **Alaska does not currently offer any certified laser hair removal programs** within the state. This lack of local educational opportunities creates additional barriers for anyone interested in entering the laser hair removal field, requiring them to travel out of state to obtain the necessary certification.

No Local Training Programs:

Unlike many other states that offer laser hair removal training at cosmetology schools, medical spas, or specialized laser training centers, Alaska does not have any programs that offer accredited laser certification. This forces aspiring CLTs to look outside the state for their education. This gap in local resources adds another layer of difficulty for those interested in entering the industry.

Out-of-State Travel Requirements:

Becoming a CLT in Alaska involves a serious commitment—not only in time but also in financial resources. Individuals must travel to another state to complete their certification, which requires paying for:

- **Airfare** to and from the training location.
- **Accommodation and meals** during the duration of the program.
- **Program tuition**, which typically costs around \$10,000 for reputable certification programs like the National Laser Institute.

These additional expenses can significantly increase the overall cost of obtaining certification, and the travel itself demands a commitment of time away from family, work, and other responsibilities. Only those who are fully committed to making this career shift are likely to invest in these additional resources.

Not a Quick Weekend Course:

It's important to emphasize that becoming a CLT is not a process that can be done over a weekend or with minimal effort. Unlike some industries where a brief course might qualify someone to open a business, laser hair removal certification requires intensive training and hands-on experience. A regular person wouldn't be able to complete a short course and immediately start offering services.

The path to certification is rigorous and demands a significant investment of time and money, meaning only those who are determined, motivated, and willing to spend the necessary resources will be able to pursue this career. This commitment serves as a natural filter, ensuring that only those truly serious about the profession can enter the industry.

Program Cost and Duration:

As noted, reputable training programs, such as the National Laser Institute (NLI), typically require a financial investment of \$10,000 to \$15,000 for certification. The program generally takes 7 to 14 days to complete, adding further time away from home. In addition to program costs, the expenses for travel, hotel, and meals can add several thousand dollars more to the final bill.

Serious Career Commitment:

The requirement to leave the state and invest additional money makes pursuing laser hair removal certification a decision that only those truly dedicated to making a serious career move will undertake. This is not a simple or quick process; it requires careful planning, a financial commitment, and a strong desire to enter the field of laser hair removal. For individuals who do make this commitment, the rewards can be substantial in terms of job satisfaction and career opportunities, but the initial hurdles are high.

By offering reasonable certification paths within Alaska, such as through remote learning options combined with local clinics for hands-on training, the state could help reduce these barriers and allow more people to enter the workforce, helping to meet the growing demand for laser hair removal services.

Citations:

National Laser Institute. "Laser Hair Removal Certification: Course Overview." NLI, Accessed October 2024.

Alaska Department of Labor and Workforce Development. "State Workforce Data and Trends." Alaska DOL, Accessed October 2024.

8. Laser Hair Removal vs. Tattooing

Both laser hair removal and tattooing involve skin-focused procedures, but they differ significantly in terms of invasiveness, safety concerns, and how they affect the skin. While both are cosmetic services, laser hair removal is much less invasive than tattooing, making it a safer and less complex procedure. This section will explore the differences between these two services and the relative safety of each, focusing on the fact that laser hair removal does not puncture the skin and is generally safer, yet it is subject to stricter oversight compared to tattooing.

Laser Hair Removal: A Less Invasive Procedure

Laser hair removal is a non-invasive cosmetic procedure that targets hair follicles beneath the skin's surface. The laser energy penetrates into the **subcutaneous layer of the skin**, where it is absorbed by the pigment (melanin) in the hair follicles. This process heats the follicle, damaging it to prevent or reduce future hair growth. Importantly, the laser **does not puncture or break the skin**, making the procedure much less invasive than other skin treatments, including tattooing.

- **No Skin Piercing or Bleeding:** Since the laser focuses on the hair follicles below the skin, the surface remains intact. There is no bleeding, scarring, or puncturing of the skin, which greatly reduces the risk of infection or other complications.
- **Minimal Recovery Time:** Clients who undergo laser hair removal typically experience mild side effects like redness or slight swelling, which resolve within hours to a day. The skin remains unbroken, so there's no need for extensive recovery time or special aftercare, unlike more invasive procedures.

Tattooing: A More Invasive Process

Tattooing, in contrast, involves **piercing the skin** repeatedly with needles that deposit ink into the **dermal layer** of the skin. This process creates a permanent design in the skin by introducing foreign pigments that the body does not absorb.

- **Skin Puncturing and Bleeding:** Tattooing inherently involves puncturing the skin thousands of times per minute, which causes **bleeding**, swelling, and scabbing during and after the procedure. This breaks the skin's natural barrier and can increase the risk of infection if proper aftercare is not followed.
- **Introducing Foreign Substances:** During tattooing, foreign pigments (inks) are injected into the skin. These pigments are often composed of various chemicals that the body must process, and complications like allergic reactions, infections, and scarring are possible. The fact that tattooing involves introducing foreign materials into the body increases the complexity and risk compared to laser hair removal, which involves no such substances.

Regulatory Disparity:

Despite tattooing being more invasive and having a higher risk of complications, the regulatory requirements for tattooing are often less stringent than those for laser hair removal. In many states, individuals can become licensed tattoo artists with basic training and minimal oversight, whereas laser hair removal often requires extensive certification and, in some cases, medical supervision.

- **Tattooing: Invasive with Fewer Regulations:** Tattoo artists are not usually required to operate under medical supervision, and many states have lenient regulations when it comes to licensing. This is despite the fact that tattooing involves breaking the skin, introducing foreign substances, and carrying a higher risk of infection and complications.
- **Laser Hair Removal: Less Invasive but More Heavily Regulated:** In contrast, laser hair removal, which does not involve skin puncturing or the introduction of foreign substances, is more stringently regulated. In some states, Certified Laser Technicians (CLTs) must operate under the indirect supervision of a medical professional, even though the procedure is far less invasive than tattooing.

Key Differences in Invasiveness:

- **Laser Hair Removal:**
 - Targets hair follicles in the subcutaneous layer of the skin.
 - **Does not pierce or break the skin.**
 - No bleeding or scarring.
 - Minimal side effects such as temporary redness or swelling.
- **Tattooing:**
 - Punctures the skin repeatedly with needles to introduce ink into the dermal layer.
 - Causes **bleeding, scabbing, and swelling.**
 - Involves foreign substances (ink) that the body must process, increasing the risk of allergic reactions or infections.
 - Requires more detailed aftercare to avoid complications like infection or scarring.

Conclusion:

While both laser hair removal and tattooing are cosmetic procedures, laser hair removal is **significantly less invasive**. It does not involve puncturing the skin or introducing foreign substances, which means it carries a much lower risk of complications. Despite this, laser hair removal is often subject to more stringent regulations and oversight than tattooing, which has greater potential risks due to its invasive nature. This regulatory disparity highlights the need for more consistent standards that reflect the true risks associated with each procedure.

Citations:

National Laser Institute. "Laser Hair Removal Certification: Course Overview." NLI, Accessed October 2024.

Mayo Clinic. "Tattooing: Risks, Recovery, and Results." [Mayo Clinic](#), Accessed October 2024.

American Academy of Dermatology. "Laser Hair Removal: What to Expect." AAD, Accessed October 2024.

9. Dangers of Laser Hair Removal

While laser hair removal is often perceived as a highly technical procedure, the reality is that laser hair removal is not inherently dangerous when performed by trained and certified professionals. The risks associated with the procedure are minimal and can be easily mitigated with proper safety protocols, such as the use of laser safety goggles and pre-treatment consultations to review any potential contraindications. The most significant danger is improper handling of the laser equipment, particularly regarding eye safety, but even these risks are rare and easily preventable with standard precautions.

Laser Safety:

The primary safety concern with laser hair removal revolves around the laser device itself, not the procedure on the skin. Laser equipment, if mishandled, could pose a danger to the eyes, which is why laser safety goggles are a standard requirement for both the technician and the patient during treatment.

- **Eye Protection:** In most states, both the technician and the patient are required to wear **laser safety goggles** during the procedure to prevent accidental exposure to the laser beam, which could cause permanent damage to the eyes. This is the most critical safety measure in laser hair removal. However, the risk of accidental eye injury is very low when these precautions are followed, and certified laser technicians are trained specifically in laser safety.
- **Proper Equipment Handling:** Certified Laser Technicians (CLTs) undergo extensive training in handling laser devices. The most dangerous scenario occurs when the laser is **improperly managed** or aimed at areas it shouldn't be—particularly the eyes. When safety protocols are followed, such as calibrating the laser properly and ensuring that goggles are worn, the risks of injury are negligible.

Reviewing Contraindications:

To ensure safe and effective treatment, many states require that patients provide a list of medications or medical conditions prior to laser hair removal. This allows the technician to screen for any contraindications that might make laser treatment inappropriate. Certain medications, such as those that make the skin more sensitive to light (e.g., photosensitizing medications like retinoids or antibiotics), may increase the risk of skin irritation or burns.

- **Pre-Treatment Consultation:** During this consultation, the technician reviews the patient's medical history, medications, and any skin conditions that could increase the risk of adverse reactions. For example, those with certain skin conditions (such as active infections or conditions like psoriasis) may need to avoid laser treatments or postpone the procedure until the condition resolves.
- **Minimal Risks:** When these precautions are followed, laser hair removal is generally very safe. Unlike more invasive cosmetic procedures, laser hair removal **does not break the**

skin and does not introduce foreign substances, which significantly reduces the risk of infection or complications.

Injury and Malpractice Records:

The safety of laser hair removal is also reflected in the **lack of reported injuries** and the **absence of widespread malpractice claims** associated with the procedure. Despite millions of treatments being performed annually, cases of significant injury from laser hair removal are extremely rare. This is largely due to the non-invasive nature of the treatment and the stringent training and certification standards required of laser technicians.

- **Low Incident Rate:** Injuries, when they do occur, are typically minor and resolve on their own, such as mild redness or irritation. Burns, pigmentation changes, or blistering are exceedingly rare, especially when performed by a certified technician following proper protocols. There are few, if any, cases of serious injuries reported in reputable medical or legal databases regarding laser hair removal.
- **Lack of Malpractice Claims:** Unlike other cosmetic procedures, laser hair removal has no significant record of malpractice cases. Because the procedure is minimally invasive and doesn't involve breaking the skin or introducing foreign substances, the likelihood of a client experiencing a severe injury that would lead to a malpractice suit is very low. This stands in stark contrast to more invasive procedures, such as surgical cosmetic treatments, which have a much higher rate of complications and legal actions.

Conclusion:

Laser hair removal is not a dangerous practice when performed by trained and certified technicians. The most significant risk—eye injury—can be easily avoided with the use of mandatory safety goggles, which are required in most states. Additionally, pre-treatment consultations to review a patient's medical history and medications help ensure that contraindications are identified and addressed. The low number of reported injuries and the lack of malpractice claims further demonstrate the safety of this procedure. Overall, laser hair removal is one of the safest and most effective cosmetic treatments available, provided that proper precautions are taken.

Citations:

National Laser Institute. "Laser Hair Removal Certification: Safety and Risks." NLI, Accessed October 2024.

American Academy of Dermatology. "Laser Hair Removal: Risks and Benefits." AAD, Accessed October 2024.

Mayo Clinic. "Laser Hair Removal Safety Guidelines." [Mayo Clinic](#), Accessed October 2024.

10. Contraindications

Certified Laser Technicians (CLTs) are thoroughly trained to understand and recognize contraindications—factors that might make laser hair removal unsafe or ineffective for certain clients. Contrary to the belief that a medical professional is necessary to determine these contraindications, CLTs are fully capable of making these assessments based on their training and established protocols. They follow a standard process of reviewing paperwork completed by the client before the procedure, allowing them to identify any issues that might interfere with treatment.

Training on Contraindications:

CLTs receive specific training on how to identify contraindications during their certification programs, such as the one offered by the National Laser Institute. This training includes detailed information on medications, skin conditions, and other factors that may impact the safety or effectiveness of laser hair removal.

- **Comprehensive Education:** CLTs learn about the interactions between the laser and various skin types, medical conditions, and medications that can affect the outcome of the procedure. This includes understanding how medications like retinoids or antibiotics (which can increase skin sensitivity) may pose a risk, or how conditions like photosensitivity or active skin infections might require postponing treatment.
- **Non-Medical Professionals Can Handle Contraindications:** Importantly, CLTs **do not need to be medical professionals** to identify and manage contraindications. Their training provides them with the necessary skills to recognize when a treatment should not proceed. CLTs are taught to understand the potential risks and to act accordingly, whether that means delaying a session or advising the client to consult a healthcare provider.

Paperwork and Pre-Treatment Review:

Before a laser hair removal session, clients are required to fill out detailed paperwork that includes their medical history, current medications, and any relevant skin or health concerns. This paperwork is reviewed by the CLT to determine if there are any contraindications that would prevent safe treatment.

- **Pre-Session Consultation:** Based on this review, the CLT can either proceed with the treatment or recommend modifications. For example, if a client is taking medications that cause photosensitivity, the CLT may decide to reschedule the session or adjust the laser settings to minimize any potential skin damage.
- **Self-Sufficient Review:** The process of reviewing paperwork and making these determinations can be done independently by the CLT. There is no need for a doctor or nurse to step in, as CLTs are trained to assess this information and make appropriate decisions regarding treatment.

Safe and Effective Process:

By completing this pre-treatment review and understanding contraindications, CLTs are able to provide safe and effective laser hair removal treatments without requiring constant oversight from medical professionals. This further supports the argument that CLTs, when properly trained, are fully capable of managing the laser hair removal process from start to finish.

Examples of Common Contraindications:

- **Photosensitizing Medications:** Certain drugs can make the skin more sensitive to light, increasing the risk of burns or irritation. CLTs are trained to recognize these medications and adjust the treatment or reschedule the session if necessary.
- **Active Skin Conditions:** Conditions such as eczema, psoriasis, or dermatitis in the treatment area may require delaying or modifying the procedure to avoid aggravating the condition.
- **Recent Tanning or Sunburn:** Laser hair removal is less effective and riskier on recently tanned or sunburned skin, so CLTs are trained to identify these situations and adjust the treatment schedule accordingly.

Conclusion:

Certified Laser Technicians are well-equipped to identify and manage contraindications, thanks to their extensive training. They do not need to be medical professionals to make informed decisions regarding the safety of laser hair removal treatments. The pre-treatment paperwork provides all the necessary information, allowing CLTs to review it and proceed independently, ensuring that the process is safe for every client.

Citations:

National Laser Institute. "Laser Hair Removal Certification: Contraindications and Safety." NLI, Accessed October 2024.

American Academy of Dermatology. "Laser Hair Removal: What to Expect and Contraindications." AAD, Accessed October 2024.

Mayo Clinic. "Medications and Skin Conditions That Impact Laser Hair Removal." [Mayo Clinic](#), Accessed October 2024.

11. Role of Medical Providers

In many states, Certified Laser Technicians (CLTs) are required to operate under the indirect supervision of a medical director, who provides oversight and answers questions related to client safety and contraindications. However, the role of the medical director in this context is often limited to administrative and advisory responsibilities rather than direct involvement in the laser hair removal procedures. Most medical directors are not trained or certified to operate lasers and do not need to be present in the facility while treatments are performed.

Use of Medical Directors in Other States:

In states that regulate laser hair removal, a medical director is often required to provide indirect oversight for CLTs. This model allows CLTs to operate independently while ensuring that there is a qualified medical professional available to handle any complex questions, particularly those related to contraindications.

- **States With Medical Director Requirements:**
 - **Texas:** In Texas, CLTs can operate under the supervision of a medical director, who oversees the practice and ensures that safety protocols are followed. However, the medical director is not required to be physically present during the procedure. They provide oversight to ensure that the laser hair removal facility adheres to state regulations, and they can be consulted as needed if complications arise.
 - **California:** California requires that laser hair removal be performed under the supervision of a licensed physician, but the physician does not need to be on-site. CLTs work under their medical director's authority, with the physician serving as an advisor who can be contacted in case of questions or contraindications.
 - **Florida:** In Florida, medical directors oversee laser hair removal technicians but are not required to be physically in the building during treatments. They provide the necessary supervision on an administrative level and ensure compliance with state laws, but day-to-day laser operations are handled by the CLT.

The Medical Director's Role:

The role of the medical director in these settings is primarily one of oversight. They serve as a resource for the CLT to consult in cases of uncertainty or when questions arise about specific client health concerns, such as contraindications. However, it is important to note that most medical directors are not laser certified and may have no experience operating a laser themselves.

- **Answering Questions About Contraindications:** Medical directors can be consulted when a CLT encounters a potential contraindication during the pre-treatment screening process. These contraindications could include the client's use of **photosensitizing**

medications (like antibiotics or retinoids), the presence of **active skin infections**, or certain medical conditions like autoimmune disorders or skin cancers. While the CLT is trained to recognize these issues, they may consult the medical director for additional guidance or confirmation.

- **Administrative and Legal Oversight:** The medical director's role is largely administrative, ensuring that the laser practice operates in compliance with state regulations. They are responsible for ensuring that proper safety protocols are in place, and that the CLTs are certified and trained to operate the laser equipment safely.

Medical Directors Do Not Need to Be Laser Certified:

Interestingly, in most states, the medical director **does not need to be trained or certified** in the operation of lasers. Their oversight role is focused on ensuring the safety and legal operation of the facility, not on the technical aspects of laser procedures. This creates a situation where the medical director provides a legal and safety umbrella for the CLT but does not intervene in the actual treatment process unless a medical complication arises.

- **Not Required to Be Present or Laser Trained:** The medical director does not need to be present in the facility when laser hair removal treatments are being performed. Their oversight is provided remotely, allowing CLTs to operate independently as long as they have access to the medical director for consultation when necessary. In most cases, the medical director has little to no involvement in the day-to-day operations of the clinic beyond fulfilling regulatory requirements.

Why This Model Works:

This model of supervision works well because CLTs are trained to handle most of the responsibilities associated with laser hair removal, including identifying contraindications and following safety protocols. The medical director is available to **answer more complex medical questions** when necessary but is not involved in the technical aspects of the procedure. This system allows the CLT to operate independently while still maintaining a **safety net** in the form of indirect medical oversight.

- **Minimal Involvement in Laser Operations:** Since medical directors are typically not laser certified and have no direct experience with laser procedures, their role is limited to offering guidance on broader medical issues rather than providing specific laser-related expertise. This reflects the reality that laser hair removal is a **cosmetic procedure** that can be safely performed by trained technicians without direct medical intervention.

Examples of Common Contraindications Addressed by Medical Directors:

- **Photosensitizing Medications:** If a client reports using medications that increase sensitivity to light, the CLT may consult the medical director to confirm whether the treatment should be rescheduled or adjusted.
- **Medical Conditions:** Conditions such as autoimmune diseases or skin cancers may require additional medical input before proceeding with laser treatments, allowing the medical director to offer guidance on whether the treatment is appropriate.

Conclusion:

The use of medical directors to oversee Certified Laser Technicians in states like Texas, California, and Florida ensures that laser hair removal practices operate safely and in compliance with regulations. However, the role of the medical director is primarily administrative and advisory, and they do not need to be on-site or certified to operate lasers. CLTs are trained to manage the technical aspects of laser hair removal, while the medical director provides oversight and is available to address contraindications or broader health concerns as needed. This model allows for safe and effective operation while giving CLTs the autonomy to perform treatments independently.

Citations:

National Laser Institute. "Laser Hair Removal Certification: Role of Medical Directors." NLI, Accessed October 2024.

Texas Department of Licensing and Regulation. "Laser Hair Removal Program and Medical Directors." TDLR, Accessed October 2024.

California Board of Barbering and Cosmetology. "Supervision Requirements for Laser Hair Removal." [BBC](#), Accessed October 2024.

Florida Department of Health. "Laser Hair Removal Oversight Guidelines." [FL DOH](#), Accessed October 2024.

12. Ablative vs. Non-Ablative Lasers

In the world of cosmetic laser treatments, there are two primary categories of lasers: ablative and non-ablative. Ablative lasers work by heating the underlying tissue in the skin, which damages the hair follicle and stops future hair growth. Non-ablative lasers, on the other hand, penetrate the skin without damaging the surface. In the context of laser hair removal, ablative lasers are considered the gold standard due to their efficiency and effectiveness. I believe that Certified Laser Technicians (CLTs) should be allowed to use ablative lasers without the need for a medical director to be on-site, nor should they be required to be nurses or other medical professionals to operate these lasers.

Ablative Lasers: The Gold Standard for Hair Removal

Ablative lasers work by heating the underlying tissue in the skin, targeting the hair follicles with precision. This heat damages the follicle, effectively stopping future hair growth. Ablative lasers are known for their high efficacy and have been FDA-approved for use in laser hair removal procedures.

- **Efficiency and Effectiveness:** Ablative lasers provide longer-lasting results than non-ablative lasers. By reaching the subcutaneous layer and heating the underlying tissue, ablative lasers are able to target hair follicles more directly and effectively. This makes them a superior choice for clients seeking significant and permanent hair reduction.
- **FDA-Approved Technology:** Ablative lasers have been thoroughly evaluated and approved by the FDA for use in hair removal procedures. Their safety and efficacy have been well-documented, providing reassurance that these devices can be operated safely when handled by certified professionals, like CLTs, who are trained in laser operation and safety protocols.

CLTs and Ablative Lasers: No Medical Director or Nursing Degree Required

Certified Laser Technicians (CLTs) are specifically trained to handle both ablative and non-ablative laser technologies. The rigorous training programs provided by reputable institutions cover the technical and safety aspects of using these powerful devices.

- **No Medical Expertise Required:** Contrary to some regulations in other fields, operating an ablative laser for hair removal does not require medical expertise. CLTs receive comprehensive training that covers all safety concerns, including recognizing contraindications and using the laser equipment properly. There is no need for a nurse or medical professional to oversee the procedure or operate the laser. This training makes CLTs fully competent in handling ablative lasers without requiring the involvement of a medical director or having one present in the office.
- **No On-Site Medical Director:** In states like Texas, California, and Arizona, ablative lasers are used under the supervision of a medical director, but the director is not required to be on-site. Instead, the medical director provides oversight, reviews treatment protocols, and is available for consultation if needed, but the day-to-day operations are conducted by the CLT independently.

State Regulations Supporting CLTs' Use of Ablative Lasers

Many states across the U.S. already recognize that ablative laser hair removal can be safely and effectively performed by trained CLTs without requiring the presence of a medical director or any further medical qualifications.

- **Arizona:** In Arizona, CLTs are allowed to use ablative lasers under the supervision of a medical director who does not need to be present in the facility. CLTs are expected to follow safety protocols and are fully trained to operate the lasers autonomously.
- **Florida:** In Florida, CLTs can operate ablative lasers under indirect supervision. Medical directors are not required to be on-site, allowing the CLTs to work independently once they have completed the necessary certification programs.
- **Nevada:** Nevada follows a similar approach, allowing CLTs to use ablative lasers as long as they are trained and certified. The state does not require CLTs to have medical qualifications, only that they adhere to established safety guidelines and are overseen by a medical director who does not need to be physically present.

Why Ablative Lasers Should Remain Accessible to CLTs

The continued ability of CLTs to use ablative lasers without needing to be medical professionals or having an on-site medical director is crucial for the growth and accessibility of laser hair removal services in Alaska and beyond. Requiring medical degrees or the constant presence of a medical director would limit access to these services, increase costs, and create unnecessary barriers for both professionals and clients.

- **Safety Through Proper Training:** CLTs are already trained to a high standard to ensure the safe use of ablative lasers. By allowing them to continue operating these lasers independently, states can ensure that the industry remains both accessible and safe without imposing unnecessary barriers to entry.
- **Maintaining High Standards While Encouraging Growth:** Allowing trained, certified professionals to use ablative lasers without additional medical supervision supports job growth, opens up career opportunities for non-medical professionals, and helps meet the growing demand for laser hair removal services.

Citations:

National Laser Institute. "Ablative Laser Certification and Use." NLI, Accessed October 2024.

Arizona Radiation Regulatory Agency. "Regulations on Ablative Laser Use for Certified Laser Technicians." [ARRA](#), Accessed October 2024.

Texas Department of Licensing and Regulation. "Laser Hair Removal Program and Supervision Requirements." TDLR, Accessed October 2024.

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Florida Department of Health. "Ablative Laser Guidelines and Supervision Requirements." [FL DOH](#), Accessed October 2024.

13. Laser Services Beyond Hair Removal

Certified Laser Technicians (CLTs) are trained to perform a wide range of cosmetic laser services beyond just hair removal. These additional services, including **photo facials, laser tattoo removal, body contouring**, and skin resurfacing, open up significant opportunities for CLTs to grow their practice and brand. It is important that CLTs have access to certifications in these advanced treatments without the need for a nursing degree or on-site medical supervision, but still under the requirement of obtaining certifications from reputable and accredited programs.

Laser Services CLTs Can Provide Beyond Hair Removal

- **Photo Facials (Intense Pulsed Light - IPL):** IPL treatments, often referred to as photo facials, are used to treat pigmentation, sun damage, and vascular lesions by delivering pulses of light into the skin to target discoloration. This procedure requires knowledge of how different skin types react to light, and CLTs are trained in this area to perform the treatment safely and effectively.
- **Laser Tattoo Removal:** Laser tattoo removal is one of the most common services CLTs offer beyond hair removal. Using **Q-switched lasers**, CLTs can break down ink particles in tattoos without damaging the surrounding skin. This service requires technical expertise in handling different wavelengths depending on the ink colors used in the tattoo, and CLTs receive specialized training to handle this procedure safely.
- **Body Contouring (Laser Lipolysis):** CLTs also perform **laser body contouring** procedures such as laser lipolysis, which uses **non-invasive lasers** to break down fat cells in targeted areas of the body. These treatments require precision and knowledge of body anatomy, both of which are covered in certification programs for CLTs.
- **Skin Resurfacing:** Ablative and non-ablative lasers are used in skin resurfacing procedures to treat wrinkles, scars, and other skin imperfections by stimulating collagen production. CLTs who specialize in skin resurfacing use lasers like **fractional CO2** or **Erbium lasers**, depending on the depth and intensity of the treatment required.

Types of Lasers Used in These Procedures

- **IPL (Intense Pulsed Light):** Commonly used in photo facials for pigmentation and sun damage correction.
- **Q-Switched Lasers:** Specifically used for tattoo removal, these lasers break down ink particles in the skin without affecting the surrounding tissue.
- **Fractional CO2 Lasers:** Used for deeper skin resurfacing, these lasers remove layers of skin to promote collagen production and new skin growth.
- **Erbium Lasers:** Often used in less aggressive skin resurfacing treatments, these lasers focus on treating fine lines and wrinkles with minimal downtime.
- **Diode Lasers:** Commonly used in body contouring, diode lasers heat fat cells to break them down without invasive surgery.

State Regulations Allowing CLTs to Operate Independently

Many states allow CLTs to perform various laser services independently or with indirect supervision, meaning that a medical director does not need to be physically present for treatments, nor does the CLT need to hold a nursing degree. This allows CLTs to perform a variety of laser services safely while keeping the barriers to entry reasonable.

- **Arizona:** Arizona allows CLTs to perform laser hair removal and other laser services like tattoo removal and skin resurfacing under **indirect supervision**. The medical director must oversee the facility but does not need to be on-site during treatments.
- **Texas:** In Texas, CLTs can perform laser hair removal, IPL treatments, and other laser services without requiring a medical professional to be present. Medical directors are required to oversee the practice remotely, providing supervision as needed, but they are not required to be on-site.
- **Florida:** In Florida, CLTs can offer a variety of services, including body contouring and tattoo removal, under **remote medical supervision**. Similar to Arizona and Texas, the supervising physician must be available but does not need to be physically present.
- **Nevada:** CLTs in Nevada can independently perform laser hair removal and advanced procedures such as skin resurfacing and tattoo removal under **indirect supervision**. A medical director oversees the practice but is not required to be on-site, allowing CLTs to operate autonomously as long as they adhere to safety protocols.

Certification and Licensing Considerations

It is crucial that CLTs have access to **comprehensive certification programs** that cover all laser services, not just hair removal. Each service requires specific training due to the varying types of lasers used and the technical skills needed to operate them. However, it is not necessary for CLT licensure to be fragmented into individual certifications for each service. Instead, CLTs can achieve comprehensive certification that covers multiple services, allowing them to grow their expertise and practice.

- **Maintaining Comprehensive Certification:** A **comprehensive certification** that includes hair removal, tattoo removal, photo facials, body contouring, and skin resurfacing allows CLTs to offer a broad range of services. This helps them grow their practice and avoid limitations caused by fragmented licensing.
- **Importance of Accredited Programs:** The need for **accredited programs** cannot be overstated. These programs ensure that CLTs are fully equipped to handle a variety of laser procedures, maintaining high standards of safety and efficacy. This ensures that clients receive the best care, and the industry remains professional and regulated.

Why It's Important to Allow CLTs to Grow Without Medical Barriers

By enabling CLTs to be certified in a variety of laser services, the industry encourages growth and allows these professionals to build their brands. Requiring a nursing degree or on-site supervision by a medical director would place unnecessary barriers to entry and limit the ability of CLTs to expand their offerings.

- **No Medical Degree Required:** The technical nature of these laser procedures does not require a medical background. Certified Laser Technicians receive specialized, focused

training that equips them to handle these treatments safely. By allowing CLTs to perform these services without needing a nursing degree, the industry can flourish without restricting job opportunities.

- **No On-Site Medical Director Needed:** States like **Arizona, Texas, and California** allow CLTs to operate under indirect medical supervision, ensuring safety without requiring a medical director to be on-site. This model works well for procedures like tattoo removal and skin resurfacing, where the CLT is trained to handle the lasers independently, and the medical director can be consulted remotely if needed.
- **Opportunities for Growth:** Allowing CLTs to expand their services and certifications supports the growth of their businesses and the industry as a whole. It also ensures that clients have access to a broad range of cosmetic laser treatments, making these services more accessible to a wider population.

Conclusion

Certified Laser Technicians should be allowed to perform a variety of laser services beyond hair removal, including photo facials, tattoo removal, and body contouring, without the requirement of being a nurse or needing an on-site medical director. Comprehensive certification programs from accredited institutions ensure that CLTs are fully trained in these procedures, allowing them to expand their expertise and grow their practice without unnecessary barriers. This approach benefits both the professionals in the field and the clients seeking safe, effective cosmetic treatments.

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14. Conclusion: The Vital Role of Certified Laser Technicians (CLTs) in the Industry

Certified Laser Technicians (CLTs) are critical to the continued growth and accessibility of the laser services industry. These professionals are trained to provide a wide range of laser treatments, including laser hair removal, tattoo removal, body contouring, and skin resurfacing, without needing to be medical professionals such as nurses or doctors. Through rigorous training programs, CLTs acquire the knowledge and technical skills necessary to perform these services safely and effectively, ensuring a high standard of care for their clients.

It is important to emphasize that the risk associated with laser hair removal and other cosmetic laser services is minimal when proper protocols are followed. CLTs are trained to recognize contraindications, handle laser equipment safely, and mitigate any potential risks. Safety protocols, such as the use of protective eyewear and pre-treatment consultations to review medical history, are integral parts of the certification process. These measures ensure that CLTs can deliver treatments that are both effective and safe, without the need for direct oversight by a medical professional.

In light of this, it is crucial that the state of Alaska recognizes CLTs as a distinct professional entity, separate from estheticians or other cosmetology licenses. Establishing a specific CLT licensure would allow individuals to be certified in one or multiple areas of laser expertise, such as laser hair removal, tattoo removal, or body contouring. This would provide a clear, regulated pathway for non-medical professionals to enter the field, while maintaining the highest standards of training and safety through accredited programs.

By acknowledging CLTs as their own category of professionals, Alaska can encourage growth within the cosmetic laser industry, opening up job opportunities and providing consumers with greater access to these in-demand services. At the same time, this approach ensures that the industry remains regulated and that only those who have undergone the necessary training and certification can perform laser services. Offering licensure in multiple areas allows CLTs to expand their practice and meet the varied needs of clients, from hair removal to more advanced skin treatments, fostering both professional growth and industry innovation.

In conclusion, Certified Laser Technicians play an indispensable role in the cosmetic laser industry, providing safe, effective, and specialized services. With minimal risk involved and comprehensive training requirements in place, there is no need to require medical degrees or on-site supervision for CLTs. Instead, Alaska should create clear pathways for licensure, supporting the growth of the industry while ensuring that clients receive the highest level of care from certified professionals. Establishing CLTs as a recognized and licensed profession will benefit both the workforce and the public, driving forward a thriving and safe laser services industry in the state.

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