

## **Agency Response to Economic Impact Analysis**

The Boards of Nursing and Medicine have the following comment on the analysis of the Department of Planning and Budget for the proposed amendment to 18VAC90-30-10 et seq., Regulations Governing the Licensure of Nurse Practitioners relating to training and supervision of laser hair removal.

The EIA references “nurses” practicing or performing laser hair removal; the proposed regulations and the statutory mandate references nurse practitioners. The references to nurse should be amended to read “nurse practitioner.”

The EIA notes that individuals performing laser hair removal without supervision will have to secure a supervision arrangement with a licensed doctor. In fact, both the law and the regulation allow a nurse practitioner to provide such supervision. In 2018, legislation was adopted to authorize nurse practitioners with years of experience to practice autonomously. Additionally, nurse practitioners who do have an agreement with a collaborating physician may have their own practice and are not required to practice in the same location as the physician. Therefore, it is not necessary for a laser hair business to have a supervision arrangement with a doctor; it may have such an arrangement with a nurse practitioner.