California: the rules for aesthetic practice

What California's laws and boards say about who may do aesthetic treatments, who must supervise them, and who can own the practice.

Nurse practitioners: Restricted Practice

Nurse practitioners

Restricted (AANP). By default NPs practice under standardized procedures with a supervising physician. Two exceptions under AB 890: a "103 NP" (3 full-time years or 4,600 hours of practice within 5 years, in California, after certification, plus national certification) may practice without standardized procedures, but only in a group setting where at least one physician practices with them; a "104 NP" (at least 3 more years or 4,600 hours as a 103 NP in good standing, certified from 2026) may practice outside a group setting, within their certification (B&P §2837.103, §2837.104). Both must post a notice and tell new patients that an NP is not a physician.

Delegating to RNs, estheticians and staff

Botox: physicians, or RNs and PAs under physician supervision; no unlicensed person, such as a medical assistant, may inject. Lasers and IPL: physicians, or RNs and PAs under physician supervision; medical assistants, LVNs, cosmetologists, electrologists and estheticians may not do them under any circumstances (Medical Board of California).

Who can own the practice

YES. The Medical Board says a med spa offering laser and cosmetic medical services must be a physician-owned practice or professional medical corporation with a physician as majority shareholder, and a layperson can't be its medical director.

Owning a med spa

An NP can't own a medical spa that offers laser and cosmetic medical services; the physician must hold the majority. Confirm the structure with a California healthcare attorney.

The biggest risk in California. Ownership and staffing. The Medical Board says a med spa offering laser and cosmetic medical services must be physician-majority owned, and medical assistants and estheticians may not do lasers or Botox. Only a 104 NP may practice outside a group setting with a physician.

Check it with your boards: California Board of Registered Nursing - rn.ca.gov and Medical Board of California - mbc.ca.gov. Checked November 3, 2026. Rules change, so read the current rule on the board's own site before you act.

Ask S.A.G.E. next. S.A.G.E., our AI practice advisor, answers from this same California reference, free in your TMAA account, which you can set up at go.medicalaestheticsassociation.com/start-here. Try:

1. I'm an RN in California. What has to be in place before I offer injectables?
2. What must my medical director agreement cover in California?
3. What can an esthetician do in California, and what needs an order?

S.A.G.E. is not legal advice. For a binding answer, talk to a healthcare attorney in your state.