Illinois: the rules for aesthetic practice

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

Nurse practitioners: Reduced Practice (full practice authority available after 4,000 hours)

Nurse practitioners

Reduced (AANP). APRNs need a written collaborative agreement until they qualify for full practice authority: 250 hours of continuing education or training plus 4,000 hours of clinical experience after national certification, in collaboration with physicians, with a notarized attestation filed with IDFPR (225 ILCS 65/65-43). Even with full practice authority, Schedule II opioids need a physician consultation relationship (oral, topical or transdermal only, no injection) and benzodiazepines past 120 days need a physician consultation.

Medical director or supervising physician

Collaborative agreement until full practice authority; after that, no collaborative agreement except the consultation rules above.

Delegating to RNs, estheticians and staff

Botox and other injections are the practice of medicine; a physician may delegate them to LPNs, RNs, and trained unlicensed staff in an office setting with a licensed professional on site. Medical lasers must be performed by a physician, who may delegate: ablative procedures with the physician on site; non-ablative with the physician on site or reachable by phone or electronically; documented training on each system. The physician must examine the patient before laser treatment, except non-ablative laser hair removal since January 1, 2025, when an APRN does the exam under a delegation protocol, a trained RN or LPN does the procedure, and a physician can be reached (68 Ill. Adm. Code 1285.336). Estheticians can't present themselves as working under their esthetics license while doing delegated medical tasks.

Who can own the practice

YES. IDFPR's med spa memo (updated October 30, 2025) says med spas must be owned and operated by physicians, and APRNs may own and operate one for some services. Only a physician or an APRN may be a shareholder or member.

Owning a med spa

Physicians may use a medical corporation, a professional service corporation (805 ILCS 10) or a PLLC (805 ILCS 185). APRNs may use only a professional service corporation or a PLLC. A sole proprietorship or partnership must be owned by physicians or APRNs. Cosmetology or esthetics can't be practiced by the same entity, and a salon registration can't be used to run a med spa.

The biggest risk in Illinois. Ownership must be physicians or APRNs only, in the right entity type, with esthetics kept in a separate business.

Check it with your boards: Illinois Department of Financial and Professional Regulation - idfpr.illinois.gov/profs/nursing.html and idfpr.illinois.gov/profs/boards/statemedboard.html. 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 Illinois reference, free in your TMAA account, which you can set up at go.medicalaestheticsassociation.com/start-here. Try:

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