New York: the rules for aesthetic practice

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

Nurse practitioners: Full Practice (after 3,600 hours, through July 1, 2030)

Nurse practitioners

Full (AANP). An NP with 3,600 hours of practice or fewer works in collaboration with a licensed physician under a written practice agreement and written practice protocols. Until July 1, 2030, an NP with more than 3,600 hours does not have to meet those requirements at all (N.Y. Educ. Law §6902(3)). If the law is not extended again, from July 1, 2030 those NPs would need collaborative relationships with one or more physicians or a qualifying hospital, documented on an Education Department attestation form.

Delegating to RNs, estheticians and staff

No Education Department nursing guidance on cosmetic injections was checked in November 2026. Ask the Office of the Professions before an RN injects.

What counts as medical

Injections of any drug (including Botox), fillers, microneedling, laser procedures other than laser hair removal, radiofrequency procedures, GLP-1 drugs and IV therapy need a licensed professional, and the patient must be seen by a medical professional before any service (Department of State, January 2026). In its first statewide round the Department inspected 223 businesses and cited 87; penalties ran up to license revocation. Estheticians and other appearance-enhancement licensees may not do these.

Who can own the practice

Only people licensed for the same professional service may own a New York professional corporation, and its directors and officers must be licensed too (Business Corporation Law §1503, §1507, §1508), so a medical PC is physician-owned. The Department of State says a med spa offering medical services must be licensed as a medical facility or practice, typically with a physician or NP as medical director, and a PC or PLLC needs a Certificate of Authorization from the State Education Department. Whether a business owned by a non-physician may employ or contract physicians is not settled: no statute, board ruling or court decision on it was found. Confirm the entity type with a New York healthcare attorney.

The biggest risk in New York. Med spas staffed by estheticians doing injections, microneedling, RF or non-hair-removal lasers; the state is inspecting and revoking licenses.

Check it with your boards: NYSED Office of the Professions, Nursing - op.nysed.gov/prof/nurse and NYSED Office of the Professions, Medicine - op.nysed.gov/professions/physicians. 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 New York reference, free in your TMAA account, which you can set up at go.medicalaestheticsassociation.com/start-here. Try:

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