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November 2022

**LASER RECURRENCY TRAINING, ANSI STANDARDS and STATE LICENSING
To meet both ANSI Z136.3 Requirements, and various State Licensing Requirements**

This can get a little confusing because we’re dealing with differing requirements from national laser standards, and separate State requirements in select States. I’m not going to address this here on a State by State basis, but generally describe these requirements and how to meet them. If your State has laws that require periodic retraining for either relicensing, or just a requirement for laser operators overall, then you’ll need to research that with your State Board of Medicine. Most U.S. States have no such requirements, but some do. If you’re from outside of the U.S., please remember that many governmental authorities in other countries pattern their regulations after U.S. standards. It’s best to be prepared.

**ANSI LASER STANDARDS FOR RETRAINING**
The American National Standards Institute (A.N.S.I.) Z136.3 Standards on the Safe Use of Lasers in Health Care Facilities are the national standards that we base laser safety programs on. (Yes, they also apply to private medical, dental and veterinary offices, medispas and aesthetic laser practices). I am currently a member of that Z136.3 committee. ANSI standards are not law per se, but they are used as criteria for various organizations which do have enforcement authority such as OSHA (Occupational Safety & Health Administration), the Joint Commission for hospitals, and some State agencies, whether that State has specific laser laws or not. Regardless of enforceability they are a good idea and represent a consensus of health care laser users overall.

The ANSI requirement for “retraining” is fairly easy, but also somewhat vague. This isn’t necessarily bad here because it gives the individual more flexibility in how to stay “current” with lasers. Even before this ANSI provision you would routinely see versions of this in hospitals for physicians performing laser procedures. If they had not done one or two laser cases within a year or so, they were required to have “refresher” training. You’d also see this for hospital staff running lasers for physicians. If a laser operator hasn’t done a case with that laser for many months, they become “rusty” and need a refresher. ANSI addresses this with completing a “competency checklist”. There is no specific timeline nor requirements, but just the general requirement that if someone has become “rusty” in laser use, they should have a refresher. You can do this yourself with more experienced staff working with you on lasers, or you can bring someone in from the outside for simple refresher training.

The retraining requirement is now more specifically included in the ANSI standards in section 5.2.2 under Training Programs. It says that retraining programs should be provided at intervals determined by the Laser Safety Officer - LSO (so it’s up to you) in accordance with your facilities Policies & Procedures (so again up to your own requirements) and applicable regulations (so State requirements would kick in here), but NOT LESS frequently than every five years. They further define who this applies to and include laser users (so physicians and non-physicians that do the patient treatments of any type), laser operators (implying here the staff that run lasers for a physician who is in a sterile field), the Laser Safety Site Contacts or Laser Safety Specialists (if assigned), the Deputy LSO (if assigned) and the LSO’s.

That section does not define the extent of “retraining” and leaves that decision up to the LSO along with how often it is required. My own opinion is that if one is routinely running the lasers then there is no need at all for “retraining” at any interval. Still, to comply with ANSI you must accomplish this at least once every 5 years. You could also attend the American Society for Laser Medicine and Surgery (ASLMS) annual meeting to show evidence of “currency”. I know some facilities that just require evidence of retraining in some form or another on an annual basis. You also see this with the State if Illinois requiring retraining on an annual basis for ALL laser users and operators.

 There is an example of FAA federal regulations for Aviation that DO NOT require retraining if one has stayed “current” running the equipment. The FAA example of this is a proficiency requirement for pilots flying in instrument conditions (clouds, rain, etc where you can’t see where you are going and must rely upon the instruments in the aircraft). These are Instrument Flight Rules (IFR) that require the pilot to fly a minimum number of instrument approaches within every 6 month period to stay “current” and legal. It’s self-documented in their own log book. If they lapse on this currency then they are required to complete an Instrument Proficiency Check (IPC) with an approved instructor in order to be “legal” again for another 6 months. This works well and if you fly routinely and shoot approaches you never have to go through retraining. I think this is a good idea for laser use as well. You saw this before with hospitals that required physicians to go through a “refresher” if they hadn’t done a laser case in a year or more. I’ll encourage the ANSI committee to look at a similar provision so that if one is routinely performing laser procedures (or running lasers) that they don’t need to submit to this retraining requirement. In the meantime, it is still listed as a minimum of once every 5 years.

If you do not have a set of the ANSI Z136.3 laser standards then you NEED one – not for each person using the lasers but only one for your facility to use as a guidance document for you LSO managing the laser safety program. You may buy these through the Laser Institute of America, or from our non-profit Laser Training Institute. Go to the home page of our <https://LaserTraining.org> site, then scroll down and you’ll see a place to click for the ANSI 136.3 standards. If you’re reading this live on a computer, then you can just click this link[[1]](#footnote-1) : <https://lasertraining.org/Registration_Seminar.php>. Use the pull-down menu to choose “Just” the ANSI standards. Every facility that utilizes lasers must have a copy of these ANSI standards in that facility.

**STATE LASER REQUIREMENTS OTHER THAN LICENSING**
OK – now on to some State requirements. First let’s differentiate between State regulation and/or licensing of clinical laser providers such as for laser hair removal, versus administrative requirements of just having to register your lasers (and pay the State a fee) or registering your Laser Safety Officer or anyone performing medical laser service. These don’t necessarily originate through the State Board of Medicine, and frequently are in some sort of Radiation Regulatory Agency (yes, this is an oxymoron because medical lasers are nonionizing, but it is what it is). In Texas for instance, you must register all of your lasers with the State and pay them a fee. Every facility must have a Laser Safety Officer and you must file that with the state and provide a formal training certificate for them specifically for Laser Safety Officer training[[2]](#footnote-2). Laser service agents must also register and pay a fee with the State – both manufacturer service technicians and independent service agents. The rest of this article doesn’t really discuss this. We want to talk about State requirements for overall laser users or relicensing of aesthetic laser providers.

**STATE LASER REQUIREMENTS FOR LICENSING AND/OR RECURRENCY TRAINING**
There are only a few States that currently have requirements for either retraining or initial licensing, so you’ll need to check with your State Board of Medicine to see if they do. Tracking this down can get confusing – especially if they have no such requirements, which most don’t. It all starts with the State Board of Medicine – yes, even if you are a nonmedical laser hair removal or PhotoBioModulation practice. Sometimes that Board will delegate to another department such as the board of cosmetology or the electrolysis board, but the original authority comes from the Board of Medicine. The State might have a regulation requiring initial licensing of non-physician users, whether they have some type of recurrency requirement or not. The reason for the confusion, especially if they have NO requirements, is that the person you speak with on the phone has no clue of whether they have requirements or not and keep passing you around to different people or offices. First go on to the State Board of Medicine website and use their search function to find any information on licensing for laser or light-based devices.

There is a group that we frequently refer people to, to get help finding what those State requirements might be (if any at all). That is Boston Medtech Advisors in Massachusetts. For a modest fee they can make available to you the regulations in your state. They won’t interpret them for you but can give you the specific regulations. You’ll find their information at [www.bmtadvisors.com](http://www.bmtadvisors.com). Andrea Nadai is a senior consultant there and wrote an article in 2008 (yes dated, but still mostly applicable) about State regulations and the medical spa industry. That article is at <https://www.bmtadvisors.com/docs/MedEsthetics%20article_May%202008.pdf>. Call or email them and they can help you determine what your state’s regulations are for laser and light based devices (and other things).

Illinois is an example of a state that requires registration of your lasers, designation of a laser safety officer, and establishment of a laser safety program. They also require recurrency training for EVERYONE that uses lasers in any healthcare/aesthetic/dental/veterinary field. Surgical Laser Operators in hospitals or Aesthetic Laser Operators performing laser hair removal must ALL have this annual training. I’m using this as one example and don’t intend to go State by State here. Lasers there are regulated by the Illinois Emergency Management Agency (IEMA). They don’t specify the exact hours nor format required, but generally require an annual review of laser safety. You’ll find the general IL laser regulations at [www.iema.illinois.gov/iema/dns.asp](http://www.iema.illinois.gov/iema/dns.asp).[[3]](#footnote-3) We have been working with Trace Services[[4]](#footnote-4) out of Roselle IL to provide such laser safety training twice annually in IL. If you are in IL and can’t make one of those seminars, we do have an online recurrency training program that you can take to meet the requirement.

Other States including, but not limited to, FL, TX, AZ, MA, GA, NC, OR and others have their own requirements for laser users or equipment. There really is wide disparity in State Regulations and it would be nice if there could be some type of Federal Standard that would consistently apply to all states – kind of like having a drivers license that allows you to drive in all states.

There is an example of nationwide credentialing used to automatically grant state licenses to practice. Respiratory Therapists do that with the National Board for Respiratory Care (NBRC). Once you have achieved Registry or Certification with the NBRC through passing the exam and meeting the other background requirements, you can easily obtain your state license to practice in any U.S. State. You make application and pay your fee to the state, and they then look you up on the NBRC database to verify your credentials. Once verified you’re granted your state license. It works in any state, and you must meet only the NBRC requirements – not a hodgepodge of varying state requirements. I believe that this is exactly how non-physician laser licensing should work. In the United Arab Emirates (UAE) and other countries they have already adopted this for both physician and non-physician licensing. Once an applicant has provided proof of their U.S. based NCLC Laser Certification and paid their fee, they are issued a license to practice there. This trend is growing.

Some U.S. states are now licensing their non-physician aesthetic laser operators. Some of these also require an NCLC Laser Certification[[5]](#footnote-5) as part of this process for various levels of licensees. These usually have some sort of minimum time requirement for continuing education for renewals that seem to span from 3-5 hours (as a minimum) to meet those relicensing requirements (i.e. Oregon).

**EASIER WAYS TO MEET RECURRENCY TRAINING REQUIREMENTS.**This all brings us to our role as a non-profit medical education laser training organization in helping people meet these myriad recurrency and relicensing requirements. When someone calls us and needs only 3 credit hours of course work we struggle to find the most affordable way to help them. Most of our courses are full-on laser training programs that span from 8 to 40 credit hours. That would meet the requirement, but those full programs also cost more money and take a lot of time to complete. (Besides, they probably completed them previously and might get bored) We had been piecing together shorter accredited programs that when stitched together would meet the hours requirement but were not really in their field of interest (PhotoBioModulation for a Laser Hair Removal person, for instance). Sometimes that works fine because a person can get bored doing the same old thing all the time and learning about some new topics can be interesting. Most people though just want to meet their administrative requirements at the most affordable price.

We started addressing this regarding the generic ANSI retraining requirement by developing an hour long “Laser Recurrency Training” program that would apply to physicians, dentists, veterinarians, and laser operators of all types. It is priced at $125 for one person, or a facility can buy a package of 20 for $795 ($40ea) for the staff. That works well for hospital staff. That’s what The Ohio State University Wexner Medical Center uses for their staff to meet this ANSI recurrency requirement. Common sense should prevail though. If all you need is a quick refresher to meet the administrative requirement, then this works well. Sometimes though people really do need more retraining for a variety of reasons. Just like the use of competency checklists, someone may not have worked with a laser for a considerable time and feel a bit uncomfortable with it. We simply have a brief conversation with the person prior to their “retraining”. Typically, if they’ve been running the laser(s) routinely, they feel comfortable and don’t feel the need for more extensive retraining. For those we simply have them complete the online Recurrency program and file their accredited certificate with the laser safety program. If they are feeling a bit “rusty” for whatever reason, then we have them do the online Recurrency program first but then have them work with me or other staff to go back through hands-on laser operation in more detail. We complete the equivalent of a signed “competency checklist or letter” to go in their file along with the online program, and we’re good to go. I think this has worked out very well and could serve as a model for other hospitals trying to meet the requirements. My thought is to spend your time and resources where necessary, but don’t waste them to meet an administrative requirement if not really needed.

**LASER RECURRENCY PROGRAMS SPECIFIC TO LSO’S AND AESTHETIC LASER OPERATORS.**Ongoing Continuing Education or Retraining for some aesthetic laser operators to meet state licensing requirements generally requires more credit hours than our simple recurrency program, and it would be nice if it could be specifically directed toward their use of lasers rather than a generic laser safety review. This is what we’re developing right now for both Aesthetic Laser Operators and Medical Laser Safety Officers and they should be available as online courses before Christmas of 2022. They’ll be designed as 5 credit hour courses. That will meet the retraining hours of all states for relicensing that I am aware of. Essentially, we’ll take our 40 hour Aesthetic Laser Course, and the 16 hour Laser Safety Officer course, and pare them down to 5 hours of essentials in those programs. They should NOT be used for initial training but will be a very thorough review of those areas for people needing to meet State requirements. They are not yet listed in our course catalog (except for the generic Laser Recurrency one which is). If you have a need for that type of program, just email me at Absten@LaserTraining.org and I’ll send you a notice when the programs are available. As 5 credit hour programs they’ll probably be priced around $295. We plan on offering a 25% discount to any of our laser training alumni (seminars or online courses) and to anyone holding an NCLC Laser Certification.

You can download a PDF copy of our catalogue of online laser courses at <https://lasertraining.org/LaserCourseCatalogue2001.pdf>. Once we get those Aesthetic and LSO Recurrency courses completed, we’ll add them to that catalogue.

For those just looking into this area of laser licensing and regulations, there is another article up on our website that describes the differences between accredited Certificates of Training, actual Laser Certifications, and State licensing requirements. It applies primarily to non-physician aesthetic laser providers, but the principles apply to all. That is at [https://www.lasertraining.org/LaserLicensing&Credentialing0906.pdf](https://www.lasertraining.org/LaserLicensing%26Credentialing0906.pdf).

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1. In order for the link to work in a pdf document, you must first download a copy to your computer, then open that document from there. Otherwise if you are just reading it while online the link won’t work. [↑](#footnote-ref-1)
2. If you need such Laser Safety Officer training we can provide that through either online courses or inperson seminars. The seminars include the Medical Laser Safety Certification exam (optional but recommended). [↑](#footnote-ref-2)
3. Illinois Administrative Code, Title 32, Chapter II, Subchapter b, Part 315, Section 315.100 General Operator Requirements. Located at <http://www.ilga.gov/commission/jcar/admincode/032/032003150001000R.html> [↑](#footnote-ref-3)
4. For information on Trace’s spring and fall Laser Safety update programs, contact Denise Silva, Director of Sales & Marketing, at 630.671.9300 or email dsilva@traceservicesinc.com [↑](#footnote-ref-4)
5. National Council on Laser Certification. <https://LaserCertification.org> . Certifications for Medical Laser Safety Officers, Aesthetic Laser Operators, Laser Hair Removal Specialists, and Laser Repair Technicians. [↑](#footnote-ref-5)