



BOARD OF DENTISTRY

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ADVISORY OPINION 25-01

March 18, 2026

Re: Laser and Chemical Peels in Dental Offices

The Kentucky Board of Dentistry (the “Board”) received a request for an Advisory Opinion dated July 7, 2025. In accordance with KRS 313.021, the Board of Dentistry is authorized to issue advisory opinions related to KRS Chapter 313 (the “Dental Practice Act”) and its associated regulations. Additionally, the Board has the authority to issue Opinions pursuant to KRS 13A.130(3) and 13A.010(2)(b) as the agency with jurisdiction to interpret the statutes and administrative regulations governing the practice of dentistry in the Commonwealth of Kentucky. A review of KRS Chapter 313 and the administrative regulations promulgated thereunder, in accordance with KRS Chapter 13A, has resulted in the ruling established herein.

On March 14, 2026, the Board addressed a request for the Board’s Opinion on “the use of skin lasers and chemical peels in dental offices” in Kentucky. Specifically, whether “general dentists” may hire a licensed esthetician to perform aesthetic dermatological procedures (such as skin lasers or chemical peels) in their offices and “without the need for an MD overseer.” The initial request also mentioned that the dentist would be “train[ed] on the laser.”

Supervision of Licensed Estheticians

Chapter 317A of the Kentucky Revised Statutes establishes the Board of Cosmetology and authorizes it to “promulgate administrative regulations” addressing “the course and conduct of ... estheticians.” KRS 317A.060(1)(f). In addressing the course and conduct of estheticians, the Board of Cosmetology has properly regulated the supervision of estheticians when performing laser treatments and chemical peels.

201 KAR 12:280 titled, “Esthetic practices restrictions” sets forth the “required restrictions and limitations placed on esthetic practices.” 201 KAR 12:280. Section 2 of the regulation, “Supervision of Restricted Practices,” specifically states:

An esthetician licensed by the board shall not perform any of the activities listed in KRS 317A.130(2) unless under the immediate supervision of a licensed physician ... Services under the direct supervision of a licensed health care practitioner shall fall within the category of cosmetic resurfacing exfoliating procedures.



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Section 1 of 201 KAR 12:280 provides the following definitions:

- (2) “Cosmetic resurfacing exfoliating procedures” means the application of cosmetic resurfacing exfoliating substances by a licensed health care practitioner for the purpose of improving the aesthetic appearance of the skin. This includes services such as acid or chemical peels, microdermabrasion, and other forms of exfoliation or resurfacing of a cosmetic nature.
- (3) “Direct supervision” means to be within immediate distance, such as on the same floor, and available to respond when needed.
- (4) “Health care practitioner” means any individual certified by the Kentucky Board of Nursing, or the Kentucky Board of Medical Licensure to perform esthetic specialties.
- (5) “Immediate supervision” means a licensed physician is physically present in the same room and overseeing the activities of the esthetician at all times.
- (8) “Physician” means a medical doctor licensed by the Kentucky Board of Medical Licensure to perform services within his or her scope of practice.

Notably, under KRS 317A.130(2), “laser treatments” are among the activities which estheticians must perform “under the immediate supervision of a licensed physician.” See KRS 317A.130(2). And since the definition of “physician” under Section 1 of 201 KAR 12:280 explicitly refers to a medical doctor licensed by the Kentucky Board of Medical Licensure and does not include dentists licensed by the Kentucky Board of Dentistry, a dentist cannot oversee these procedures.

Similarly, 201 KAR 12:280 states that services “under the direct supervision of a licensed health care practitioner shall fall within the category of cosmetic resurfacing exfoliating procedures.” 201 KAR 12:280, Section 2. Because the regulation limits “health care practitioners” to individuals certified by the Kentucky Board of Nursing or the Kentucky Board of Medical Licensure, dentists licensed by the Kentucky Board of Dentistry are not authorized to provide the direct supervision required for estheticians performing chemical peels under 201 KAR 12:280.

Normal Course of the Practice of Dentistry

As for whether dentists can perform laser treatments or chemical peels, KRS 317A.020 states that:

No person shall engage in the practice of cosmetology, esthetic practices, or nail technology for other than cosmetic purposes nor shall any person engage in the practice of cosmetology, esthetic practices, or nail technology for the treatment of physical or mental ailments.

KRS 317A.020(1).

However, the statute allows a number of professions, including dentistry, to “perform incidental practices of cosmetology” or “esthetic practices ... in the normal course of the practice of their profession.” KRS 317A.020(1)(a).

The definition of “dentistry” under KRS 313.010(11) limits the scope of dentistry to the “evaluation, diagnosis, prevention, or surgical, nonsurgical, or related treatment of diseases, disorders, or conditions of the oral cavity, maxillofacial area, or the adjacent and associated structures and their impact on the human body . . .” While there may be some overlap with cosmetic procedures to the mouth, face, jaw, head, or neck, the Board is of the Opinion that purely skin-focused or “aesthetic” dermatological procedures like chemical peels and laser treatments are outside the normal course of the practice of dentistry unless performed to evaluate, diagnose, prevent, or treat oral-related conditions affecting human teeth, temporomandibular joints, the oromaxillofacial area, or the surrounding soft tissue of the head and neck. The Board’s view is that any dental license holder in the state of Kentucky should have adequate training and be able to demonstrate competency to perform soft tissue procedures associated with the head and neck.

The Board further believes that soft tissue procedures beyond the head and neck should generally be limited for dentists as they are unlikely to pertain to treating ailments associated with dental disease, temporomandibular disorders, or other pathologies generally considered dental in origin. While certain business models within the state have developed based on the idea that a licensed dentist may perform full body rejuvenation or “aesthetic” dermatological procedures, the Board, as it stands, does not affirmatively support this exploration into defining the limitations of a dental license. KRS Chapter 313 does not provide support for treatments outside the head or neck area, as such procedures would likely not be considered within the scope of dental practice by a court of law.

In conclusion, it is the Board’s Opinion that the Board of Cosmetology properly regulates the supervision of estheticians performing procedures such as laser treatments and chemical peels. Under 201 KAR 12:280 and KRS Chapter 317A, such procedures must be performed under the immediate or direct supervision of a licensed physician or health care practitioner as defined by 201 KAR 12:280. Dentists, licensed by the Kentucky Board of Dentistry, do not meet these definitions.

Furthermore, the normal course of the practice of dentistry as defined in KRS 313.010(11) does not include aesthetic dermatological procedures unless performed to evaluate, diagnose, prevent, or treat oral-related conditions affecting human teeth or jaws. It is the Board’s view that dentists should retain responsibility for obtaining the requisite training and competency associated with soft tissue treatments of the head and neck, unless future legislation provides more specific direction. Accordingly, the Board takes the position that soft tissue treatments outside the head and neck should be limited, as these procedures are unlikely to relate to a pathology of the head or neck and thus present a heightened risk for license holders. Nothing in this ruling shall be construed to exclude a dentist from providing a professional standard of care and practicing within the scope of his or her license. Therefore, any dentist who fails to provide a professional standard of care or practices beyond the scope of his or her license may be disciplined by the Board.

Approved by the Kentucky Board of Dentistry,



Jeff Allen, Executive Director