



Board of Physicians

Wes Moore, Governor · Aruna Miller, Lt. Governor · Harbhajan Ajrawat, M.D., Chair

2024 SESSION POSITION PAPER

BILL NO.: SB 995 - Health - Laser Hair Removal - Requirements (Laser Hair Removal Act)
COMMITTEE: Finance
POSITION: Letter of Information

POSITION & RATIONALE:

The Maryland Board of Physicians (the Board) is respectfully submitting this letter of information for Senate Bill (SB) 995 - Health - Laser Hair Removal - Requirements (Laser Hair Removal Act).

SB 995 establishes certain requirements for laser hair removal practitioners and the performance of laser hair removal procedures. The Board would like to note that the requirements established in SB 995 are, at times, more lenient on patient protection than the requirements in the Board's regulations on cosmetic medical procedures (COMAR 10.32.09), which laser hair removal falls under.

SB 995 is silent on any training requirements for physicians, whereas COMAR 10.32.09 requires physicians to obtain training in the medical procedure and operation of any medical device to be used in the procedure with certain requirements on whom the training may be provided by. In addition, while both SB 995 and COMAR 10.32.09 require written protocols, COMAR 10.32.09 requires more documentation in the written protocols.

The Board would like to highlight two instances in which the requirements in SB 995 directly contradict the regulations in COMAR 10.32.09: (1) SB 995 states that a physician does not need to be physically present or immediately available to supervise but may be available to communicate during the procedure, and (2) SB 995 allows a laser hair removal practitioner to perform a laser hair removal procedure without a prior diagnosis, initial assessment, or initial treatment plan prepared by the physician. COMAR 10.32.09 explicitly requires on-site supervision whenever a non-physician performs a procedure and requires a physician to personally complete an initial assessment and prepare an individual treatment plan prior to the procedure.

Thank you for your consideration. For more information, please contact Matthew Dudzic, Manager of Policy and Legislation, 410-764-5042 or Madeline DelGreco, Health Policy Analyst, 443-591-9082.

Sincerely,

Harbhajan Ajrawat, M.D.
Chair, Maryland Board of Physicians

The opinion of the Board expressed in this document does not necessarily reflect that of the Maryland Department of Health or the Administration.