Scope of Practice Request: Categorize Dermaplaning as a form of hair removal to be performed by all Licensed Estheticians in the state of Connecticut.

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- 1. Allow all Licensed estheticians in the state of Connecticut to practice dermaplaning as a form of hair removal, with approved training and a bloodborne pathogen certification.
- 2. Dermaplaning tools are easily accessible by both Licensed Estheticians and the general public, and the service can be performed (illegally) at home without proper regulation. By providing access to the proper education and training for safety protocols, Estheticians would be held to the same standard as Medically Licensed Estheticians that are currently allowed to perform the service. This guarantees safety for clients and Estheticians in the community. As described in in the Practice Act § 191(4), "'esthetics' means services related to skin care treatments (a) including, but not limited to ... exfoliating ... or removing unwanted hair using manual and mechanical means." Dermaplaning is both a gentle form of hair removal and an exfoliate equal to the intensity of waxing; under current law Estheticians are already licensed to perform waxing. We argue that dermaplaning falls under both an exfoliating method, as well as a method of removing unwanted hair using a manual mean. As a method of hair removal, dermaplaning carries far fewer potential adverse side effects than waxing such as skin lifting or tearing, burning, ingrown hairs, and allergic reactions to the chemicals in wax. In addition, dermaplaning can be a more desirable option for both clients and Estheticians a like. Dermaplaning is virtually painless in comparison to waxing for the client and is also safer for the Esthetician; as it causes far fewer repetitive motion injuries, as the "flicking" motion used when waxing services are performed is very strenuous on both the wrist and elbow joints. Waxers commonly suffer from and are treated for lateral epicondylitis known as "tennis elbow" from straining their joints during these services.
- 3. Granting of this request will regulate all practices of dermaplaning and prevent injury and infection of clients. As a byproduct, a safer form of hair removal will be accessible to our community.
- 4. The Practice Act § 192(b) states, "On and after January 1, 2020, each person seeking an initial license as an esthetician shall apply to the department on a form prescribed by the department, accompanied by an application fee of one hundred dollars and evidence that the applicant (1) has completed a course of not less than six hundred hours of study and received a certification of completion from a school approved under section 197 of this act or section 20-262 of the general statutes or in a school outside of the state whose requirements are equivalent to a school approved under section 197 of this act, or (2) (A) has practiced esthetics continuously in this state for a period of not less than two years prior to July 1, 2020, and (B) is in compliance with the infection prevention and control plan guidelines prescribed by the department under section 19a-231 of the general statutes in the form of an attestation." As described in § 191(4), "esthetics' means services related to skin care treatments (a) including, but not limited to... exfoliating... or removing unwanted hair using manual and mechanical means.
- 5. Under the Connecticut General Statutes § 19a-903c, dermaplaning is categorized as a "cosmetic medical procedure" and is incorrectly lumped in with much more invasive treatments such as cosmetic surgery, hair transplants, cosmetic injections, cosmetic soft tissue fillers, intense

chemical peels, laser treatments, intense pulsed light, injection of cosmetic filling agents and neurotoxins, and the use of class II medical devices designed to induce deep skin tissue alteration.

- 6. Under Connecticut law, 600 hours of schooling are required to obtain your Esthetics license. No additional certifications are currently required to Dermaplane in Connecticut, but egregiously requires the supervision of a physician, physician assistant, or an advanced practice registered nurse.
- 7. To our current knowledge in 2019-2020 three scope of practice requests were submitted for Dermaplaning, creation of Esthetician's license, and the number of hours required to obtain an Esthetics license in Connecticut: and one in 2020-2021 for Dermaplaning. But there has been a spike in support from both the public and other professionals in the industry, as seen by a public Change.org petition.
- 8. This shift would require Estheticians to gain knowledge of blood borne pathogens, further increasing safety in the Esthetics profession.
- 9. While the complete economic impact is unknown, the current laws has driven many previous Dermaplane clients to neighboring states, such as New York. With the grant of this request, there will be additional revenue gained from the added certification and increase of business in Connecticut due to additional New York customers being serviced in Connecticut.
- 10. California: "Senate Bill (SB) 803 (Roth, Chapter 648, Statutes of 2021) (Updated July 2022)

 Effective January 1, 2022, Senate Bill (SB) 803 made several changes to the Board of Barbering and Cosmetology's laws. Such changes included: Reducing the cosmetology and barbering programs to 1,000 hours (from 1,600 and 1,500 respectively). Creating a 600-hour program for a new (non-chemical) hairstylist license. Changing the esthetic scope of practice to include lash and brow tinting and perming. Removing the practical examination and therefore eliminating the pre-application process. Increasing the number of board members from 9 to 13 and requiring that one licensee from each sector of the industry be represented on the Board. Allowing for a streamlined endorsement process to license an individual that holds a valid license in another state. Requiring an apprentice to receive their pre-apprentice training from the Board prior to licensure. Updating the requirements for a mobile unit. Increasing the hours allowed in the extern program. Note that some provisions will require regulations to be adopted before implementation (e.g. the 600-hour hairstylist license)."

New York: "The practice of "esthetics" means providing for a fee, or any consideration or exchange, whether direct or indirect, services to enhance the appearance of the **face**, neck, arms, legs, and shoulders of a human being b the use of compounds or procedures including makeup, eyelashes, depilatories, tonics, lotions, **waxed**, sanding and tweezing, whether performed by **manual, mechanical, chemical, or electrical means and instruments** but shall not include the practice of electrology."

11. There would be no direct impact to those currently performing Dermaplaning as there is no additional certification or requirement to be fulfilled currently.

12. Proposed changes would create additional training to the Esthetics profession with no negative impact to current education or training. Specifically, a bloodborne pathogen certification would be required in addition to Dermaplaning training for all Estheticians.