Scope of Practice for the professions of Estheticians, Eyelash Technicians, and Nail Technicians.

1. A plain language description of the request;

The Connecticut Coalition of Beauty Industry Schools is requesting that the Connecticut Department of Public Health conduct a scope of practice into the hours of education for the professions of Estheticians, Eyelash Technicians, and Nail Technicians. We feel the education hours set forth in the legislation is adequate except for the Estheticians' at 600, should be 100 clock hours.

Estheticians- a person who, for compensation, engages in any one or a combination of the following practices, esthetics, or cosmetic skin care: (A) Massaging the face of neck of a person; (B) Trimming eyebrows; (C) Dyeing eyelashes or eyebrows; or (D) Waxing, stimulating, cleansing, or beautifying the face, neck, arms, or legs of a person by any method with the aid of the hands or any mechanical or electrical apparatus or by the use of a cosmetic preparation. Such practices of esthetics shall not include the diagnosis, treatment, or therapy of any dermatological condition, Completed 100-hour course in an approved school under the supervision of the Connecticut Office of Higher Education

Nail Technician - a person who, for compensation, trims, files, shapes, decorates, applies sculptured or otherwise artificial nails, or in any way cares for the nails of another person, and completed 100-hour course in an approved school under the supervision of the Connecticut Office of Higher Education.

Eyelash Technician- "Eyelash technician" means a person, who for compensation performs individual eyelash extensions, eyelash lifts or perms and eyelash color tints; and has completed, 50 hours in an approve school under the supervision of the Connecticut Office of Higher Education.

2. Public health and safety benefits that the requestor believes will occur if the request is implemented and, if applicable, a description of any harm to public health and safety if it is not implemented;

The Connecticut Coalition of Beauty Industry Schools believes that the licensing of Estheticians, Eyelash Technicians, and Nail Technicians will have a positive impact on the public health and safety. Yet, true public health and safety can only be achieved if it required that everyone currently and prospectively looking to become an Estheticians, Eyelash Technicians, and Nail Technicians be mandated to receive an education in the profession. Grandfathering individuals will only allow for people with unsafe practices to continue. Placing themselves and the public at risk. We the Connecticut Coalition of Beauty Industry Schools feel there is no need for a two-year trainee license to be implemented. For the same reason as the grandfathering clause. This trainee licenses will just allow people with bad practices to teach the trainee those bad habits further placing the public at risk.

3. (NEW) the impact that the requestor believes the request will have on the profession's ability to obtain or expand third party reimbursement for the services provided by the profession;

If a salon, Day spa or Nail Spa chooses to reimburse for Education tuition, Kit and Textbooks, Licensure, State Board Exam fee, it would be a choice. As for helping to pay for Title IV Student loans obtained at the Esthetics 600 hour program, that would be a choice.

Keeping the Clock hours at 100 would greatly help the industry and minimize future student loan debt.

As for the service, obtain or expand the services offered at a licensed location, Licensing would not have an impact on services already being offer without a license. Because of the language barrier, we believe Licensing would put a lot of existing salons and day spas out of business. Most existing salon and spa owners tend to be minority owned businesses, from other countries.

4. The impact of the request on public access to health care;

Licensure would ensure that Dept of Labor Minimum standards are met in each salon or day spa, the State of Ct would now have a record of the Employees Labor records, hours worked, payroll, and now W2's for Tax purposes. Enrolling in Husky and Access Health would be streamlined, and up to date earnings would be realized.

5. A brief summary of state or federal laws governing the profession;

Pursuant to Section <u>10-22b</u>, Connecticut General Statutes, all barber/hairdresser schools must obtain a certificate of authorization from the <u>Office of Higher Education</u> and the Connecticut Board of Examiners for Hairdressers, Barbers and Cosmeticians prior to offering instruction to students intending to sit for the licensure examination and receiving a license as a barber or hairdresser.

In early June, 2019, the Connecticut General Assembly passed House Bill <u>7424</u>. Sections 191-200 provide for a licensing program for estheticians, eyelash technicians and nail technicians, the bill has not yet been signed by Governor Lamont.

Please monitor this website periodically for updates regarding the Department's implementation of these licensing programs.

The following information is current and will be updated if the Governor signs the bill.

Pursuant to Section <u>20-250(4)</u>, Connecticut General Statutes, no Connecticut license is required of individuals performing facials, pedicures, eyebrow arching, shampooing, manicures, or braiding. There is no licensure or certification offered or required for nail technicians or estheticians in Connecticut.

6. The state's current regulatory oversight of the profession;

Local Municipalities Health departments are tasked with the regulatory requirements for the profession of Esthetician, Eyelash Technician, and Nail Technician.

7. All current education, training, and examination requirements and any relevant certification requirements applicable to the profession;

Currently the State of Connecticut does not have educational requirements for Esthetician, Eyelash, and Nail Technician. Yet, for over a decade the cosmetology schools in the state of Connecticut have taught esthetics, eyelashes, and nails to individuals who currently work in the state.

The current esthetics program is taught using the Milady curriculum the national standard for esthetics. The esthetic course hours range from 100 hours to 600 hours in nationally accredited schools. We the Connecticut Coalition of Beauty Industry Schools feel that the course can be taught for less than 600 hours and request that the hours for becoming an esthetician in the state of Connecticut should be 100 hours. This has been the standard for the past 10 years in some schools. It keeps the price of Education at an affordable rate without taking student loans and adding more additional debt over the next 10 years. This program has been approved by the OHE since 2015

The current nail program is taught using the Milady curriculum the national standard for nails. The Nail course is currently 100 hours and we the Connecticut Coalition of Beauty Industry Schools feel that 100 hours is sufficient in educating students on the occupation as a nail technician. This is the average standard across the United States with 12 hours starting in some states. This program has been approved by the OHE since 2015

There is currently no curriculum for eyelashes in cosmetology schools. 50 hours for becoming an eyelash technician is sufficient. We are currently working with Milady Cengage of Albany developing a text book and Cirrculiam. This should be ready for early 2020.

Cosmetology schools offer an all-encompassing certification in their cosmetology program. Students who successfully complete the cosmetology program currently have the education and the ability to perform the duties of an esthetician, eyelash, and nail technician.

We the Connecticut Coalition of Beauty Industry Schools believe these cosmetology students should be allowed to perform in the occupation without needing to go back to school to receive an itemized education in the three occupations of esthetics, eyelash and nail technicians.

8. A summary of known scope of practice changes requested or enacted concerning the profession in the five years preceding the request:

This is the correct pathway to licensure for current Estheticians and Nail Technicians who have already had some form of formal training, or have already taken a course at an approved School or institution approved by the OHE, and now have opened their own business, or are currently working in the industry. Proof of working for 5 years would be sufficient to grant licensure.

9. The extent to which the request directly affects existing relationships within the health care delivery system;

In the health care system, however, infectious diseases, and bacteria are in all salons, day spas and Nail spas, licensing with proper education in sanitation and bacteriology will minimize customer exposure and incidents and help keep health visits down to a routine level.

10. The anticipated economic impact of the request on the health care delivery system; Unknown at this time

11. Regional and national trends in licensing of the health profession making the request and a summary of relevant scope of practice provisions enacted in other states;

Connecticut is above the trend with requiring licensing for Eyelash technician, it would be the very first state in the Union to require a state license for applying False Eyelash extensions. 50 clock hours is a good start for a new program.

Estheticians clock hour programs in the US range from 100 Clock hours to 600. The reason why some are at 600 is because that is the Minimum clock hour requirement to obtain title IV funding. Most schools have been teaching a 100 hour clock program to help keep the cost of tuition down. Same book, same theory of instruction. Facial practical instruction can be completed is as little as 50 hours and 50 hours of theory instruction.

As for Nail Technician in other states, the range is from 12 hours of theory in Alaska, which is the fastest growing state in Nail tech licensing in the past 10 years, average is 100 clock hours, to as high as 300 clock hours. 100 are sufficient for CT.

12. Identification of any health care professions that can reasonably be anticipated to be directly affected by the request, the nature of the impact, and efforts made by the requestor to discuss it with such health care professions; and

Nail technician, it is estimated that there are approximately 1500 individual Nail Salons in the CT currently operating under local Health Department guidelines, with an estimate of 4 individuals employed at each location, 6000 jobs would be currently affected with direct licensing.

Esthetics currently the Estimate is approx 650 spa or salon locations, offering Esthetics, Skin Care services, under the local health departments with approx 2 employee's at each location as an average across CT. 1300 Jobs would be affected.

Eyelash Technician, since this is a new industry in the past 3 years, and no numbers exist in any other state, as a current school owner I can only estimate as to the amount of inquires that come in daily. We have been teaching a lash class 40 clock hours as part of our advanced makeup artistry design class, I would estimate 250 licenses first year, 600 year 2, and 1500 year 3, as to the huge increases, affordability, low class cost, low upstart, low inventory, most will be able to afford a 50 clock hour class with time and costs.

13. A description of how the request relates to the health care profession's ability to practice to the full extent of the profession's education and training.

With the implementation of Licensure, it will ensure the visiting public, that all requirements for licensure have been met by the practicing individual by an accredited school or facility by the Office of Higher Education to the standards that will be set forth in this scope of study.