



May 1, 2023

TO: Linda Ward, Scott Weaver, Cindy Straley, Fletcher Bland, Vanessa Cartwright, Jaclyn Turner, Gabriella Abel, Victoria Williams, Teri Baranski

RE: ASCP/AHP/ANP opposed to MOAHR #2022-19 LR

POSITION: Opposed

VIA EMAIL

Associated Skin Care Professionals, Associated Hair Professionals, and Associated Nail Professionals (the Associations) provide professional liability insurance, business resources, professional publications, and legislative and regulatory advocacy for more than 44,000 members nationwide, including approximately 1,000 Michigan members.

The Associations are opposed to proposed rules MOAHR #2022-19 LR. While we appreciate the intent of the proposed rules, the Associations believe that the proposed rules would drastically alter the scope of practice for licensed estheticians. Michigan estheticians are highly trained and skilled—they have in-depth knowledge of the skin and contraindications and must attend an esthetics program of at least 400 hours. The proposed rules are too limiting and would undercut and devalue the profession.

By prohibiting licensed estheticians from performing widely accepted and highly sought-after services, such as microdermabrasion, dermaplaning, hydrodermabrasion, microneedling, microblading, Botox injections, or cutting, shaving, or removing any layer of the skin or skin growths, Michigan would cut the legs out from underneath local businesses. These types of high-end services are generally among the highest-earning services and would negatively affect an esthetician's bottom line and annual income.

The Associations ask that you reject these rules to ensure Michigan remains a state that welcomes highly trained estheticians and businesses. However, we also recognize that the aforementioned services are more invasive and require specialized skills and training. As such, we encourage you to revisit these rules with a new lens. As an alternative, Michigan could create an advanced esthetics license that requires additional education to perform advanced modalities. Nevada, for example, created a new tiered esthetics licensing system last year. An advanced license could elevate the profession and keep these services within an esthetician's scope of practice. If this option is considered, the Associations recommend the Board adopt a grandparenting clause that allows those already expertly performing the above services to continue practicing without pause or undue regulatory burden. Perhaps presenting proof of certification in an advanced modality could be sufficient to gain an advanced esthetics license.

In conclusion, the Associations strongly encourage you to oppose rules MOAHR #2022-19 LR so as to not limit Michigan estheticians' scope of practice and business potential.

Please contact me at [lhostetter@pac.company](mailto:lhostetter@pac.company) if you have comments or questions.

Sincerely,

Lance Hostetter, Government Relations Director  
Associated Skin Care Professionals  
Associated Hair Professionals  
Associated Nail Professionals