



Issue Response

OREGON HEALTH LICENSING AGENCY

Cosmetology - Esthetics

April 12, 2012

The Oregon Health Licensing Agency (Agency) has received several inquire regarding skin or micro needling and whether or not it is within the scope of practice for esthetics.

Upon consideration and request by the Board of Cosmetology, the Agency consulted with its General Counsel at the Department of Justice and responded to the following questions:

Issue #1: Is skin or micro needling the practice of esthetics?

Short Answer#1: Likely yes.

Descriptive Answer #1: Under the law, it appears that skin or micro needling is within the scope of practice for esthetics. The skin roller is a mechanical appliance used to stimulate and manipulate the skin. There is little risk of damage to the skin using this method. However, estheticians must have obtained appropriate training in the safe and effective use of skin rollers.

Issue #2: If skin or micro needling are within the scope of practice for esthetics is it the practice of esthetics regardless of the method used, i.e. skin roller, sewing roller or tattoo gun?

Short Answer#1: Likely not.

Descriptive Answer #2: Under the law, it appears that although skin rollers appear to be devices that fall within the practice of esthetics, sewing needles appear to present a high risk of permanent damage to the skin when used for skin needling, thereby violating OAR 817-015-0050(2), and tattoo guns are designed for tattoo artistry, not for skin care, so their use by estheticians appears to be a violation of OAR 817-015-0050(1)."

Issue #3: Is there an appropriate method available for sterilization of skin rollers?

Answer #3: Yes, there appear to be a variety of lawful methods available for sterilization of skin rollers including the following:

OAR 817-010-0068 Disinfecting Non-Electrical Tools and Implements

All tools and implements used within a field of practice shall be disinfected before use on each client. The method for disinfecting non-electrical tools and implements will be as outlined below.

(1) To disinfect all non-electrical tools and implements first:

(a) Remove all hair and/or foreign material;

(b) Clean thoroughly with soap or detergent and water;

(c) Rinse thoroughly with clear, clean water; and

(d) Complete process as outlined in section (2) or (3) of this rule; or

(e) Sterilize, using one of the approved methods listed in OAR 817-010-0065(5)(b) or (c).

(2) For all tools and implements without sharp edges or points, including but not limited to combs, brushes, rollers, rods, etc., totally immerse according to manufacturer's instructions in a solution containing 1,000 parts per million (ppm) of a commercial quaternary ammonium compound or other low-level disinfectant used according to the manufacturer's instructions.

(3) For all tools and implements with sharp edges or points totally, immerse in a high-level disinfectant used according to the manufacturer's instructions.

817-010-0065(5) Requirements and Standards

(5) When used according to the manufacturer's instructions, each of the following is an approved method of disinfecting tools and implements:

(a) Complete immersion in the disinfecting solution of the object(s) or portion(s) thereof to be disinfected;

(b) Steam sterilizer, registered and listed with the U.S. Food and Drug Administration; or

(c) Dry heat sterilizer or autoclave, registered and listed with the U.S. Food and Drug Administration.

Important Note: The Agency does not provide personal legal advice to licensees or members of the public. The responses listed here are specific to only those questions asked. Even slight changes in the scope or content of the question may change the applicability of these responses in a different situation. Please consult your own attorney for legal advice regarding Oregon laws and administrative rules.