

Hello,

My name is Rebecca Covey. I have owned a Spa and Laser center for 10 years in Bend, Oregon. I am a Licensed Esthetician in the State of Oregon, a Master Esthetician in Washington, and a Laser Safety Officer. During the course of my career I have worked with various companies to test, train, and educate in my field. My post-graduate education has included many didactic courses on the physics, biophysics and clinical safety of laser and light based treatments. I have performed thousands of safe treatments using Laser, IPL, RF devices, and other modalities extensively over my career. My public service includes being Chair on a Rules Advisory Committee (RAC) selected by the Board of Cosmetology (BOC) and the Health Licensing Office (HLO) on how to best solve some of the issues we have faced as this technology has grown in our field of practice.

Enclosed (exhibit A) is the document that was approved by all members on the RAC committee and used to draft the legislation in House Bill 2642 please see (exhibit B) an email conversation with Melissa Neuberg, Dr. Darm's office manager, where she acknowledged that she and Dr. Darm both agreed with the Advanced Esthetic and Laser Certification Summary. HB2642 amendments reflect the Ad Hoc Committee's draft of the Advanced Esthetic and Laser Certification Summary (Exhibit C)

In 2006, after the last legislative changes concerning these cosmetic devices, the Oregon Health Licensing Agency (now HLO) put out an industry publication called Facial Forward. These Agency publications gave direction on what the Esthetician's scope of practice included (see exhibit D enclosed facial forward articles). For the last nine years Estheticians have been using non-ablative energy devices that were used for hair removal or to beautify the skin through collagen production approved for use within our scope of practice. Many of us currently in the field have spent the last decade training, educating, and building our business around this increased demand of cosmetic laser treatments.

Cosmetic lasers have become safer, and easier to use. These non-ablative LLRP devices effectively heat up the skin causing collagen production, reducing wrinkles, and the signs of aging. Hair removal devices target the melanin in the hair follicle for hair reduction leaving the skin cells unharmed. New safety features are being engineered into these devices every year making them even safer. We recognize that there is still some risk associated with untrained individuals operating these devices, which is why we need to create a board to standardize education and training with appropriate oversight and regulations. This ensures the safe and effective treatments for the consumer and gives a pathway for Estheticians who have chosen for this to be their specialty.

As new technology surfaces some procedures that used ablative laser technology are now showing promising new strides using non-ablative laser technology where the skin surface is not vaporized, removed or injured. HB2642 is written to encompass this new technology in this rapidly changing field.

Many new devices are now being sold to the public at retail stores for home use! The TRIA (age defining laser and hair removal) ME by Elos are examples of laser, Intense Pulse Light, and Radiofrequency technologies that are FDA approved and currently being sold at Costco, Sephora, and other retail stores for home use by the public (see exhibit E attached documents).

HB 2642 effectively regulates the training and safe use of non-ablative cosmetic devices. It requires the necessary compliance to National ANSI standards and will require having a collaborative agreement with a health care professional whose scope of practice allows for supervision and prescriptive ability. This bill also puts the responsibility of consumer safety on the licensees, not corporations, while also requiring liability insurance mandated to protect the consumer (See exhibit F example of this being created in the Dental field "expanded practice permit for Oregon Board of Dentistry").

Oregon is one of the many states that have joined other States such as Washington, Arizona, and Utah, to update their Statues to better encompass new technology that will govern the use of lasers used by Estheticians.

In conclusion HB2642 is right for Oregon. It does not over regulate, it institutes training for a field comprised of mostly women that provides a living wage. It provides services consumers want and protects the safety of the public.