

School Memo

To: Cosmetology Schools, Designated School Managers, School Email List

From: Minnesota Board of Cosmetology Staff

Re: Advanced Practice Esthetics Proposed Rules and Practical Skills Test

Date: December 21, 2017

Enclosed: Proposed Advanced Practice Esthetics Practical Skills Test and Quotas

Linked: [AP Esthetics Rules Draft with Changes 12-15-17 \(RD4342\)](#)

The Minnesota Board of Cosmetology has several upcoming changes related to advanced practice esthetics. This memo is intended to notify schools and their staff of these changes. We strongly encourage you to distribute this memo to your school staff and any other interested party.

Advanced Practice Esthetics Practical Skills Test and Quotas

The Advanced Practice Esthetics Subcommittee of the board's Practical Skills Task Force is looking for your feedback! The subcommittee has developed a draft of the Advanced Practice Esthetics Practical Skills Test and clinical service exercises ("quotas"). The Practical Skills Test and quotas would be required as part of advanced practice esthetics training offered in licensed schools. The guide follows this memo. Please know that this document is not final and is likely to be updated or amended based on feedback.

If you have any feedback or suggestions regarding the test, guide, or quotas, please send them to Catrina.Mairose@state.mn.us no later than January 8, 2018. The Advanced Practice Esthetics Practical Skills Test and quotas are expected to be reviewed at the board meeting on February 12, 2018. If the board approves these two items, they will be required for use in all advanced practice esthetics training curriculums.

Proposed Advanced Practice Esthetics Rules

Please find the revised draft of proposed rules regarding advanced practice (AP) esthetics by clicking [here](#) or visiting the board's website at mn.gov/boards/cosmetology/laws-and-rules/rule-making/. Changes from the original draft (dated 5/15/2017) are noted by underlining or striking out text. These changes were approved by the Minnesota Board of Cosmetology at the December 4, 2017 board meeting and are made in response to comments and questions on the draft, the AP esthetics scope of practice, and curriculum.

To see all of the changes, please review the attached draft. Some of the changes include:

1. Adding or editing definitions (beginning on page 1).
2. Clarifying that the practice of medicine is not included in any licensed services regulated by the Board of Cosmetology (see line 4.6).

3. Refining the scope of practice (beginning at line 6.6) to list specific cosmetic services for the epidermal layer of the skin.
4. Addressing requirements for persons who hold a salon manager license in one licensure field and apply for a license in a second field (beginning at line 14.18).
5. Extending the grandfathering period until July 2019 to allow sufficient time for licensees to meet grandfathering requirements (beginning at line 16.11).
6. Adding a provision that licensed instructors can use hours teaching advanced practice esthetic services in calculating experience hours to qualify for grandfathering (line 17.2).
7. Adding a grandfathering provision for students who will graduate in the midst of the changes in the esthetic and advanced practice esthetic curriculum (see line 18.15).
8. Adding a provision that licensees who are using a new product, device, or technique must first determine that the use is within their licensure scope, ensure that they have received adequate training to provide services safely, follow manufacturer use directions, and retain records of any training (see line 24.3).
9. Revising proposed rules on the wearing of gloves (starting at line 34.5).
10. Reducing curriculum hours for AP esthetics from 600 hours to 500 hours (see line 44.20).
11. Clarifying that a Minnesota esthetician or cosmetologist license is a prerequisite for anyone who has not completed training at a board licensed school within the past 5 years (see line 44.23).
12. Clarifying requirements for clinical instruction in the AP esthetics curriculum (beginning at line 45.18).

There will be a hearing on the proposed rules because the board received more than 25 requests for a hearing. This hearing will be held in accordance with the procedures in Minnesota Statutes, sections 14.131 to 14.20. **This hearing will be held in the Board Room at 1000 University Avenue West, Suite 100, Saint Paul, Minnesota 55104 starting at 10 AM on Monday, January 8, 2018 and will continue until all interested persons have been heard.**

Administrative Law Judge Jeffery Oxley is assigned to conduct the hearing. Judge Oxley's Legal Assistant, Lisa Armstrong, can be reached at the Office of Administrative Hearings, 600 North Robert Street, P.O. Box 64620, Saint Paul, Minnesota 55164-0620, by telephone at (651) 361-7888, by email at Lisa.Armstrong@state.mn.us, and fax at (651) 539-0310.

Questions or comments concerning the rescheduled hearing or about the rule adoption process should be directed to Rebecca Gaspard by email at Rebecca.Gaspard@state.mn.us, phone at (651) 308-2774, mail at Board of Cosmetology, 1000 University Avenue West, Suite 100, Saint Paul, Minnesota, 55104, or fax at (612) 617-2601. TTY users may call 1-800-627-3529.

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Advanced Practice Esthetics Practical Skills Test Guide

The Advanced Practice Esthetics Practical Skills Test (“AP PST”) is designed to assess the competency of Minnesota advanced practice esthetics students and is offered only by schools and skills course providers. This guide is intended to be used as a tool and offer insight into testing procedure, rules of the test, and test sections for students and test providers. This guide also includes clinical service exercise requirements, or “quotas,” required to be completed by all Advanced Practice Esthetics students during their training program.

The AP PST is divided into four sections - Advanced Exfoliation: Chemical Peel, Advanced Exfoliation: Machine or Device, Advanced Skin Care Techniques, and Skin Needling. Once each section is passed and a student’s training is completed, a Course Completion Certificate and a complete license application must be submitted to the Minnesota Board of Cosmetology for review.

The Practical Skills Test and quota requirements were developed by a task force of industry experts with the assistance of Board staff. The test and quotas are expected to be updated as necessary and as significant changes occur within the esthology industry. Any suggestions or questions may be sent to cosmetology@state.mn.us.

Clinical Service Exercise Requirements

Advanced Practice Esthetics students are required to complete a certain number of clinical service exercises, or “quotas,” within their 500 hour training. The quota requirements are outlined below.

All quotas must be:

- Performed on the face of a live model. A student may perform services on the body (e.g. decollete, hands, back, etc.), but those services will not count toward quota requirements. Services may not be performed on mannequins.
- Performed in full and include a skin analysis and client consultation.
- Supervised by instructors and checked before, during, and after performance of each quota (MN Rule 2110.0740).
- Performed in compliance with all infection control requirements in MN Rule 2105.0375 and salon prohibitions in MN Rule 2105.0375 (MN Rule 2110.0740).

Each student must complete at least:

- 30 Advanced Exfoliation Chemical Peels, including at least:
 - 10 beta hydroxy acid peels (BHA)
 - 10 alpha hydroxy acid peels (AHA)
 - 2 trichloroacetic acid peels (TCA)
 - 8 other peels, which may include any of the above, blends, or another type of advanced exfoliation chemical peel
- 30 Advanced Exfoliation Machine or Device Treatments, which may include:
 - Dermaplaning
 - Microdermabrasion

- Hydradermabrasion, or
- Another type of advanced exfoliation machine or device treatment
- Note: All 30 quotas in this category could be performed with one device or machine type, or split across multiple device or machine types.
- 30 Electrical Energy Treatments, including at least:
 - 5 treatments using direct current
 - 5 treatments using indirect current
 - 5 treatments using light energy
 - 5 treatments using sound energy
 - 10 treatments, which may include any of the above or another type of advanced practice esthetics electrical energy treatment
- 10 Skin Needling Treatments
- 3 Advanced Extractions
- 20 Lymphatic Drainage Treatments

Rules of Testing

Scheduling and Completion

The AP PST is scheduled at the will of the provider. The exam may be scheduled for one day or it may be split into multiple days. There is no limit on the time between successful completion of one section and successful completion of the final section, unlike other practical skills tests. Further, the test sections may be scheduled at any point throughout an advanced practice esthetics training program.

General Rules

- All sections are graded on a pass or fail basis – there is no point-based scoring mechanism. A student must either successfully complete all elements of a section, or they will fail that section.
- Each test must have a ratio of at least 1 examiner to 4 students to ensure a comprehensive assessment.
- Students' personal written materials, textbooks, phones, computers, or tablets may **not** be used during the test. The only electronic devices that may be used are those that are required for applicable sections, such as a timer or skin care machine.
- Manufacturer directions on the use of machines, devices, or products may be reasonably used during applicable sections.
- Students may only speak to the examiner and to their model.
- Students may not observe each other during the test.
- Hands must be washed during each section, including whenever they become contaminated.
- Compliance with MN Statutes 155A and MN Rules 2105 and 2110 must be demonstrated at all times.
- Proper safety and infection control procedure must be followed and align to requirements set forth by industry standards, the Minnesota Board of Cosmetology, MN Statutes 155A, MN Rules 2105 and MN Rules 2110.

Models, Tools, and Supplies

- Students are responsible for finding a suitable model for each service section. Mannequins may not be used.
- Models must not be student of a Board of Cosmetology approved program or a Board of Cosmetology licensee.
- Models must be 16 years of age or older.

- Supplies must be stored in clean, closed containers, cupboards or drawers, or on a clean cloth towel or clean drape. Plastic bags are not acceptable storage containers.
- Supplies cannot be shared during a service section.
- All supplies must be labeled, either by the student or with manufacturer labels.
- All products, machines, and devices must be used according to manufacturer’s directions.

Administering the Test

To begin each section, the examiner will read the section directions. Each section contains four subsections: Pre-Service, Set Up, Service, and Completion. The examiner must monitor each section thoroughly and may create a “checkpoint” after each sub-section (Pre-Service, Set Up, Service, and Completion) where the examiner pauses to check student work, such as station set up or the client questionnaire.

Only one subsection per section is timed. Students must complete each Service subsection within one hour. The Pre-Service, Set Up, and Completion subsections are untimed. The examiner will notify students when the Service timing begins and will provide warnings when there are five minutes and one minute remaining. Once a student has completed the service, they must raise their hand for a final completion check by the examiner. If a student does not complete the service section, they must stop immediately when the time ends.

Grading Guidelines

Each service section is graded on a pass-fail basis. All tasks must be completed successfully, in order, and in accordance with industry best practice and regulations. There is no point system or other scoring mechanism – a student either passes or fails each section.

If a student fails a section, the student will need to retake that service section. For example, if a student fails Advanced Exfoliation: Chemical Peels, the student will need to retake Advanced Exfoliation: Chemical Peels but would not need to retake previously passed sections (including Advanced Exfoliation: Machine or Device, Advanced Skin Care Treatments, and Skin Needling) again. Retests are scheduled at the discretion of the school or exam provider.

Automatic Fail Incidents

In addition to failing for not successfully completing each task of a section, students may fail a section for any of the incidents listed below (A-J). For example, if a student fails detect an allergy or contraindication that would cause significant harm if the service was completed (Automatic Fail Incident B), the student would fail each section in which that happened. If a student performs any Automatic Fail Incident, the student must be notified immediately and stop the section. The Automatic Fail Incident must be recorded on the Results Form in the service section it occurred.

Automatic Fail Incidents	
A.	Injured client or self
B.	Failed to detect allergy or contraindication that would cause significant harm
C.	Contaminated unused product
D.	Did not wash hands prior to service
E.	Did not wash hands or replace gloves when contaminated
F.	Used prohibited or unclean item
G.	Improperly used machine, device, tool, or product
H.	Failed to complete service
I.	Cheated

Results Form

Each student will have a Practical Skills Test Results Form (“Results Form”) for each test date. This form requires the examiner to circle whether the student passed or failed, note any Automatic Fail Incidents, and explain any failing score.

If a student tests across multiple days, multiple forms must be used. In this case, only the section tested on that date must be completed; all other sections on the Results Form must be stricken or crossed out. If a student passes all service sections in one day, the student will only have one Results Form.

The form must be signed by the student and the examiner upon completion of each testing day. The school is required to keep all original Results Forms in accordance with MN Rule 2110.0670. Results Forms will not be submitted with the student’s application unless specifically requested by the Board.

When completing the Results Form, remember:

- A separate Results Form must be used for each test day. Any section that is not tested must be crossed off of the form.
- The examiner must circle whether the student passed or failed and note any Automatic Fail Incidents that occurred.
- Each Results Form must show accurate information and be signed.

Course Completion Certificate

Each student will have a Course Completion Certificate to submit to the Board with their application. This certificate must be completed once the student has passed the entire Practical Skills Test and met their hour requirement. It must be reviewed for accuracy, then signed by the student and designated school manager or owner, or skills course provider, and properly notarized.

The Course Completion Certificate must contain the following items:

- Date each section was passed (in mm/dd/yy format)
- Total number of advanced practice esthetics hours completed
- Date the total course was completed
- Quotas, or number of services, completed (not applicable for skills courses)
- Notarized signatures from the student and designated school manager or school owner, or skills course provider

Test Sections

The four test sections below all include directions and steps for successful completion of each service (Advanced Exfoliation: Chemical Peel, Advanced Exfoliation: Machine or Device, Advanced Skin Care Techniques, and Skin Needling).

Prior to each section, students must provide their model with a client questionnaire to assist with their client consultation. Only the steps in the Service subsection are timed and service steps must be completed within 30 minutes or one hour, depending on the section. The time a model takes to complete the questionnaire does not affect the timing of the Service section.

Each section allows students to choose one service out of several options. This choice must be based on model's skin and student knowledge. Not every single step of every service is outlined in the directions, but students are required to complete every step properly and failure to do so could result in failing the section. Students are expected to know and follow proper protocol for all steps, per industry standard or manufacturer directions, even if not explicitly outlined below.

Advanced Exfoliation: Chemical Peel

Directions: Perform a client consultation, skin analysis, and chemical peel. You may choose any advanced exfoliation chemical peel treatment, so long as the peel treats the epidermis. Pre-service, set up, and completion steps are not timed, but you must complete the service steps within 30 minutes. You will be notified when timing begins, when five minutes remain, and when one minute remains.

Advanced Exfoliation: Chemical Peel
Pre-Service
<ol style="list-style-type: none"> 1. Client Consultation <ol style="list-style-type: none"> a. Review client questionnaire. 2. Skin Analysis <ol style="list-style-type: none"> a. Perform skin analysis using systematic approach. b. Describe skin analysis results and share observations with examiner. c. Choose and indicate appropriate peel type. 3. Consent Form <ol style="list-style-type: none"> a. Provide model with consent form, describe purpose of form, and acquire signature.
Set Up
<ol style="list-style-type: none"> 1. Wash Hands 2. Prepare Work Area <ol style="list-style-type: none"> a. Disinfect bed, stand, counter, etc. b. Ensure products, supplies, and tools are prepared and available. 3. Drape Model <ol style="list-style-type: none"> a. Properly drape model to protect clothing and hair.
Service <i>This subsection must be completed in 30 minutes.</i>
<ol style="list-style-type: none"> 1. Wear Gloves 2. Prepare Model's Face <ol style="list-style-type: none"> a. Cleanse and prepare skin according to product manufacturer directions. b. Apply eye protection to model. 3. Apply Peel <ol style="list-style-type: none"> a. Apply peel to model according to manufacturer directions. 4. Monitor Peel <ol style="list-style-type: none"> a. Verbally and visually monitor peel according to manufacturer directions. b. Follow appropriate timing for peel. 5. Neutralize Peel <ol style="list-style-type: none"> a. Only neutralize if applicable. 6. Apply Finishing Products <ol style="list-style-type: none"> a. Only apply finishing products if applicable.

Completion
<ol style="list-style-type: none"> 1. After Care Directions <ol style="list-style-type: none"> a. Provide after care directions to model, including all directions from all timeframes according to manufacturer directions. 2. Clean and Disinfect <ol style="list-style-type: none"> a. Discard all single-use items appropriately. b. Disinfect work area, supplies, and tools.

Advanced Exfoliation: Machine or Device

Directions: Perform a client consultation, skin analysis, and an advanced exfoliation treatment using a machine or device. You may choose between a dermaplane treatment, a crystal microdermabrasion treatment, a diamond microdermabrasion treatment, and a hydradermabrasion treatment. Pre-service, set up, and completion steps are not timed, but you must complete the service steps within one hour. You will be notified when timing begins, when five minutes remain, and when one minute remains.

Advanced Exfoliation: Machine or Device
Pre-Service
<ol style="list-style-type: none"> 1. Client Consultation <ol style="list-style-type: none"> a. Review client questionnaire. 2. Skin Analysis <ol style="list-style-type: none"> a. Perform skin analysis using systematic approach. b. Describe skin analysis results and share observations with examiner. c. Choose and indicate appropriate device or machine and method or setting. 3. Consent Form <ol style="list-style-type: none"> a. Provide model with consent form, describe purpose of form, and acquire signature.
Set Up
<ol style="list-style-type: none"> 1. Wash Hands 2. Prepare Work Area <ol style="list-style-type: none"> a. Disinfect bed, stand, counter, etc. b. Ensure products, supplies, tools and machines or devices are prepared and available. If using a crystal microdermabrasion machine, prepare the crystals and correct tip. If using a diamond microdermabrasion machine, prepare the filter, hose, and correct tip. 3. Drape Model <ol style="list-style-type: none"> a. Properly drape model to protect clothing and hair.
Service <i>This subsection must be completed in one hour.</i>
<ol style="list-style-type: none"> 1. Wear Gloves 2. Prepare Model's Face <ol style="list-style-type: none"> a. Cleanse and prepare skin according to machine or device manufacturer directions. b. Apply eye protection to model, if applicable.

3. Use one Advanced Exfoliation Machine or Device:

3A. Dermaplane:

- a. Dry model's skin.
- b. Hold blade gently at 45 degree angle.
- c. Move blade systematically.
 - i. Hold skin taught.
 - ii. Make passes and pattern according to manufacturer directions and skin observation.
 - iii. Avoid terminal hair, nose, eyes, eyebrows, neck, chest, hands, and raised lesions.
 - iv. If a nick occurs, follow blood borne pathogen safety procedures.

3B. Microdermabrasion - Crystal:

- a. Dry model's skin.
- b. Set level of suction and crystal flow.
 - i. Test suction on gloved hand.
 - ii. Perform test patch/pass on model.
- c. Move machine systematically.
 - i. Hold skin taught.
 - ii. Make passes and pattern according to manufacturer directions and skin observation.
- d. Remove crystal dust.
- e. Cleanse face.

3C. Microdermabrasion - Diamond:

- a. Dry model's skin.
- b. Set level of suction.
 - i. Test suction on gloved hand.
 - ii. Perform test patch/pass on model.
- c. Move machine systematically.
 - i. Hold skin taught.
 - ii. Make passes and pattern according to manufacturer directions and skin observation.

3D. Hydradermabrasion:

- a. Perform patch test.
- b. Test suction on gloved hand.
- c. Choose appropriate and coordinating tips, flows, vacuum settings, and solutions for each step.
- d. Move machine systematically.
 - i. Hold skin taught.
 - ii. Make passes and pattern according to manufacturer directions and skin observation.

4. Apply Finishing Product

Completion

1. After Care Directions

- a. Provide after care directions to model, including all directions from all timeframes according to manufacturer directions.

2. Clean and Disinfect

- a. Discard all single-use items appropriately.
- b. Disinfect work area, supplies, tools, machines and devices.
 - i. Dermaplane: Dispose of blade (and handle, if single-use) into sharps container.
 - ii. Microdermabrasion: Dispose of crystals appropriately. Dispose of diamond filter in sharps container.

- iii. Hydradermabrasion: Run cleaning solution through machine, dispose of solution and single use items.

Advanced Skin Care Techniques

Directions: Perform a client consultation, skin analysis, and a facial with lymphatic drainage massage techniques and an electrical energy treatment. You must choose one electrical energy treatment such as high frequency, galvanic current, microcurrent, radiofrequency, ultrasound, or another type. Pre-service, set up, and completion steps are not timed, but you must complete the service steps within one hour. You will be notified when timing begins, when five minutes remain, and when one minute remains.

Advanced Skin Care Techniques
Pre-Service
<ol style="list-style-type: none"> 1. Client Consultation <ol style="list-style-type: none"> a. Review client questionnaire. 2. Skin Analysis <ol style="list-style-type: none"> a. Perform skin analysis using systematic approach. b. Describe skin analysis results and share observations with examiner. c. Choose and indicate appropriate devices or machine and method/setting. 3. Release/Consent Form <ol style="list-style-type: none"> a. If applicable, provide model with release/consent form, describe purpose of form, and acquire signature.
Set Up
<ol style="list-style-type: none"> 1. Wash Hands 2. Prepare Work Area <ol style="list-style-type: none"> a. Disinfect bed, stand, counter, etc. b. Ensure products, supplies, tools and devices are prepared and available. 3. Drape Model <ol style="list-style-type: none"> a. Properly drape model to protect clothing and hair.
Service <i>This subsection must be completed in one hour.</i>
<ol style="list-style-type: none"> 1. Prepare Model's Face <ol style="list-style-type: none"> a. Cleanse and prepare skin according to machine or device manufacturer directions. b. Apply eye protection to model, if applicable. 2. Treatment Must Include: <ol style="list-style-type: none"> a. Lymphatic drainage massage techniques and an electrical energy treatment* b. Application and removal of mask c. Application of finishing product <p>*Lymphatic drainage massage techniques and an electrical energy treatment must be performed during the service. At which point these are performed depends on treatment protocol and manufacturer directions.</p>

Completion

1. After Care Directions

- a. Provide after care directions to model, including all directions from all timeframes according to manufacturer directions, if applicable.

2. Clean and Disinfect

- a. Discard all single-use items appropriately.
- b. Disinfect work area, supplies, tools, machines and devices.

Skin Needling

Directions: Perform a client consultation, skin analysis, and skin needling service using any skin needling device on a model. Pre-service, set up, and completion steps are not timed, but you must complete the service steps within one hour. You will be notified when timing begins, when five minutes remain, and when one minute remains.

Skin Needling

Pre-Service

1. Client Consultation

- a. Review client questionnaire.

2. Skin Analysis

- a. Perform skin analysis using systematic approach.
- b. Describe skin analysis results and share observations with examiner.

3. Consent Form

- a. Provide model with release/consent form, describe purpose of form, and acquire signature.

Set Up

1. Wash Hands

2. Prepare Work Area

- a. Disinfect bed, stand, counter, etc.
- b. Ensure products, supplies, tools and devices are prepared and available.

3. Drape Model

- a. Properly drape model to protect clothing and hair.

Service *This subsection must be completed in one hour.*

1. Wear Gloves

2. Prepare Model's Face

- a. Cleanse and prepare skin according to machine or device manufacturer directions.

3. Use skin needling device

- a. Move machine systematically
 - i. Hold skin taught
 - ii. Make passes and pattern according to manufacturer directions and skin observation.
 - iii. If necessary, follow blood borne pathogen safety procedures.

4. Apply Finishing Products

- a. Only apply finishing products if applicable.

Completion

1. After Care Directions

- a. Provide after care directions to model, including all directions from all timeframes according to manufacturer directions.

2. Clean and Disinfect

- a. Discard all single-use items appropriately.
 - i. Dispose of single-use needles in sharps container.
- b. Disinfect work area, supplies, tools, machines and devices.
- c. Sterilize multi-use roller parts and needles that puncture skin.