

The Esthetics Manufacturers and Distributors Alliance of the American Beauty Association

Guidelines for Professional Cosmetic Resurfacing Exfoliating Procedures

I. Introduction

The Esthetics Manufacturers and Distributors Alliance (EMDA) of the American Beauty Association (ABA) represents manufacturers and distributors of personal care products within the professional beauty industry. EMDA serves the interests of its members within the professional beauty industry and seeks to enhance the professional treatment of clients of the professional beauty industry. To advance these goals, EMDA developed these Guidelines for Professional Cosmetic Resurfacing Exfoliating Procedures for cosmetologists, estheticians and/or skin care specialists licensed to practice skin care within their state. EMDA's Guideline Committee drafted the Guidelines with input and advice from industry participants. Before publication, the draft Guidelines were reviewed and approved by EMDA's Review Committee.

II. Objectives for the Guidelines

The Guidelines are intended to enhance the safe and efficacious application of Professional Cosmetic Resurfacing Exfoliating Substances. The Guidelines recommend procedures for the application of Cosmetic Resurfacing Exfoliating Substances by licensed practitioners. The Guidelines exclude all chemicals and mechanical products that are not specifically included in the Definitions. EMDA has prepared these Guidelines as a service to the professional beauty industry and its clientele. Because the circumstances of each particular application may vary, adherence to the Guidelines does not ensure safe or satisfactory application of Cosmetic Resurfacing Exfoliating Substances under all circumstances. CAREFULLY REVIEW SECTION IX: LIMITATIONS AND DISCLAIMERS.

III. Cosmetic Use of Resurfacing Exfoliating Procedures

Exfoliation is derived from the Latin word "exfoliatus" defined as "to strip of leaves". Cosmetic Resurfacing Exfoliating Procedures have been used throughout history as a means to cleanse, smooth and improve the appearance of the skin. Today, Cosmetic Resurfacing Exfoliating Procedures utilize a variety of chemical substances and/or mechanical equipment intended to remove the stratum corneum of the epidermis thereby improving the aesthetic appearance of the skin. Cosmetic Resurfacing Exfoliating Procedures are not intended to cause viable epidermal and/or dermal wounding or injury and therefore differ from medical resurfacing procedures administered by physicians.

IV. Definitions

A. Cosmetic Resurfacing Exfoliating Substances and Equipment: "Cosmetic Resurfacing Exfoliating Substance and Equipment" includes cosmetic-use AHAs (Glycolic & Lactic Acids), BHAs (salicylic acid), Jessner's solutions (14% salicylic acid, lactic acid and

resorcinol) or modifications thereof, and proteolytic enzymes (papain, bromelain). The term also includes mechanical instruments and instruments that mechanically administer substances, including brushing machines, polyethylene granular scrubs, loofah or textured sponges, gommage and microdermabrasion instruments, provided the manufacturer has established and substantiated product and equipment safety. The term excludes all other chemical and mechanical exfoliation/peeling procedures and substances including, but not limited to Trichloroacetic Acid (TCA), Carboic Acid (phenol), or combinations thereof and further excludes all adulterated chemical exfoliating/peeling substances.

B. Cosmetic Resurfacing Exfoliating Procedures: "Cosmetic Resurfacing Exfoliating Procedures" means the application of Cosmetic Resurfacing Exfoliating Substances by Licensed Practitioners for the purpose of improving the aesthetic appearance of the skin.

C. Cosmetic Use AHAs: "Cosmetic Use AHAs" means Alpha Hydroxy Acid exfoliation preparations that do not exceed a 30% concentration with a pH value not lower than pH 3.0 as established and recommended by the Cosmetic Ingredient Review Expert Panel. (See reference in appendix)

D. Licensed Practitioner: "Licensed Practitioner" means a cosmetologist, esthetician or other person licensed or otherwise authorized by an appropriate state government regulatory agency to administer Cosmetic Resurfacing Exfoliating Substances who is practicing in a cosmetology establishment as regulated by local or state ordinances or laws.

E. Microdermabrasion Equipment: The Federal Food and Drug Administration (FDA) lists Microdermabrasion equipment as Class I devices intended for use by Licensed Practitioners trained in the appropriate use of such equipment. For purposes of these Guidelines, microdermabrasion equipment is considered a Cosmetic Resurfacing Exfoliating Substance only if they are used in a manner that is not intended to remove viable (living) skin below the stratum corneum.

V. Professional Use

Cosmetic Resurfacing Exfoliation Substances and Procedures are intended for "professional use only". Only Licensed Practitioners should administer Cosmetic Resurfacing Exfoliating Substances. These products and procedures are not intended for consumer resale or use. Licensed Practitioners must not use any equipment or practice intended to remove viable (living) skin below the stratum corneum.

VI. Compliance with State Requirements

Licensed Practitioners must comply with all rules and regulations established by their respective State Boards of Cosmetology or other governmental regulatory agency regarding Cosmetic Resurfacing Exfoliating Substances and Procedures.

VII. Recommendations for Manufacturer Instructional Material and Training

A. **Manufacturer Training Materials:** EMDA recommends that manufacturers marketing and distributing Cosmetic Resurfacing Exfoliating Substances for professional uses shall provide instructional procedure and product use training materials for Licensed Practitioners. Manufacturer sponsored training programs are independent of the training requirements established by individual State Boards of Cosmetology in professional skin care. It is the responsibility of the manufacturer to provide procedural guidelines, practical training, video and/or written instructional materials with the initial purchase of its products or equipment by or for Licensed Practitioners.

B. **Training of Licensed Practitioners:** It is extremely important that Licensed Practitioners of Cosmetic Resurfacing Exfoliation Substances receive adequate training regarding safe application procedures. Manufacturer instructional training should cover theoretical and practical application of Cosmetic Resurfacing Exfoliating Substances and Procedures. Licensed Practitioners must check and follow state board requirements and training and safety data and information supplied by the manufacturer.

C. **Recommended Training Programs:** EMDA recommends the following training programs:

1. Theoretical overview, scientific and safety data;
2. Clinical indications vs. cosmetic applications;
3. Client general history, skin evaluation, realistic expectations;
4. Contraindications/Precautions;
5. Predisposition patch testing;
6. Client pre-application care;
7. Application procedure;
8. Post application care; and
9. Client follow-up.

VIII. Cosmetic Resurfacing Exfoliating Procedures

A. **Basic Procedures:** In order to provide safe and efficacious application of Cosmetic Resurfacing Exfoliating Procedures, Licensed Practitioners should provide for:

1. Appropriate disinfection and sanitation as established by respective State Boards of Cosmetology; as regulated by local or state ordinances or laws.
2. Proper client selection and general health profile procedures before application of the product;
3. A thorough skin evaluation and consultation for each client to determine if the procedure is appropriate before application of product;
4. Verification by the client of the receipt of appropriate information; and
5. Use of proper procedures in applying product.

B. **Disinfection and Sanitation Procedures:** Licensed Practitioners should only apply Cosmetic Resurfacing Exfoliation Substances in establishments licensed or practicing in a cosmetology establishment as regulated by local or state ordinances or laws. They must

follow disinfection and sanitation procedures required by the State Boards of Cosmetology and recommended by manufacturers.

C. Client Selection and Health Profile Procedures:

1. Client History: The Licensed Practitioner should take a client history of conditions related to the application of Cosmetic Resurfacing Exfoliation Substances. Relevant topics include cosmetic related irritant/allergic reactions, HSV (cold sores) predisposition, frequency of sun exposure or tanning bed use, topical and/or oral medications, all of which may increase an individual's susceptibility to adverse reactions.

2. Sample Questions for Client History: The following are a partial list of questions to aid in determining if the procedure is appropriate:

- Female clients currently pregnant;
- History of sun exposure and/or tanning bed use;
- History of cosmetic related irritant/allergic reactions;
- History of oral and/or topical medications, i.e. tretinoin (Retin-A, Renova), isotretinoin (Accutane) and others;
- HSV (herpes simplex virus) predisposition;
- Previous facial plastic/reconstructive surgery;
- Previous chemical peel or other resurfacing procedures and outcome;
- Previous Cosmetic Resurfacing Exfoliating Procedure-type and outcome;
- Current skin care regimen; and
- Client's expectations.

3. Cautions regarding Use:

a. EMDA does not recommend the use of multiple cosmetic resurfacing exfoliating services, chemical and/or mechanical, during the same procedure;

b. Cosmetic Resurfacing Exfoliating Substances are not recommended when a client is under the supervision of a physician for skin related disorders, pregnancy, post chemical peel, laser treatments or plastic/reconstructive surgery without the approval of the physician.

c. If client history reveals cosmetic related irritant/allergic reactions, HSV (cold sores) predisposition, frequency of sun exposure or tanning bed use, or topical and/or oral medications, these factors may increase a client's susceptibility to adverse reactions. EMDA recommends, as appropriate, a predisposition patch test 24 hours before the procedure or physician advice.

d. EMDA recommends that a pregnant client receive approval from her attending physician before the procedure is administered.

D. Skin Evaluation Procedures:

1. The Licensed Practitioner should perform a physical examination and evaluation of client's skin.

a. Check for degree of sebaceous activity (skin oiliness), acne, telangiectasias (broken capillaries) and degree of photodamage;

b. Check for open cuts, sores, lesions or apparent skin irritation or sensitivity

2. EMDA recommends Cosmetic Resurfacing Exfoliating Substances not be administered to skin exhibiting open cuts, sores, sunburn, chemical or thermal burns, apparent skin irritation or sensitivity.

3. Sensitivity to chemical exfoliating products can only be determined by administering a predisposition patch test. EMDA recommends such procedure 24 hours before the application of chemical exfoliating substances.

4. After the appropriate client evaluation, the Licensed Practitioner should discuss and outline realistic expectations with the client. EMDA recommends client photo-documentation at baseline and upon conclusion of each procedure

E. Verification by Client of Receipt of Information: EMDA recommends that Licensed Practitioners maintain written documentation signed by the client that the Licensed Practitioner has taken a client history, performed a skin evaluation and discussed the planned procedures with the client. The informed client should approve the planned procedures.

F. Proper Application Procedures: EMDA recommends the following procedures in applying Cosmetic Resurfacing Exfoliation Substances:

1. Thoroughly wash and disinfect hands. The use of sterile latex gloves is recommended during the procedure. The Licensed Practitioner should wear protective face and eye guards and protective gloves and should protect the client's eyes when administering microdermabrasion treatments.

2. Prepare, drape and protect client appropriately in accordance with local or state ordinances or laws.

3. Conduct client skin evaluation and inspection.

4. Cleanse client's skin according to manufacturer's directions.

5. Apply protective eye pads or guards.

6. Apply cosmetic resurfacing exfoliation preparation or procedure according to the manufacturer directions. Manufacturers' directions may vary. Always read carefully and follow complete directions.

7. EMDA recommends the use of disposable implements.

8. Always follow manufacturers' directions regarding exposure time and skin contact.

9. Remove preparation after the appropriate exposure time with cool, damp gauze or cotton pads or as directed by the manufacturer.

10. Conclude procedure with recommended skin care products including the use of UVA/UVB SPF 15 (or higher) sunscreen.

11. Instruct client on appropriate post care.

12. Have client report any adverse reactions. Seek medical assistance if necessary.

13. Follow the manufacturer recommendation on the number of successive treatments depending on the client's skin type, condition and treatment results.

14. EMDA recommends client photo-documentation at baseline and upon conclusion of each procedure

IX. Limitations and Disclaimers

A. Disclaimer regarding Aluminum Oxide Particulate: EMDA is not aware of any long-term scientific studies to support the safety of aluminum oxide particulates in cosmetic microdermabrasion resurfacing treatments. Therefore, EMDA recommends that Practitioners and their clients use protective wear to reduce any potential risk factors that may be associated with this substance.

B. Requirement for Individual Responsibility: Undetermined variables may influence the outcome of any procedure, and specific consideration must be given to each client and procedure on an individual basis. Although EMDA intends these Guidelines to be generally useful, compliance with these Guidelines does not guarantee the client a successful procedure or eliminate other potential risk factors to individual clients. It is the responsibility of the Licensed Practitioner and the client to assure the safety and efficacy of any substance and/or procedure.

C. NO WARRANTIES: ABA AND EMDA, AND THEIR RESPECTIVE DIRECTORS, OFFICERS, COMMITTEE MEMBERS, AND AGENTS MAKE NO WARRANTIES FOR THESE GUIDELINES, INCLUDING (BUT NOT LIMITED TO) ANY EXPRESS OR IMPLIED WARRANTIES OF MERCHANTABILITY, OR FITNESS FOR A PARTICULAR PURPOSE. ABA AND EMDA ARE NOT RESPONSIBLE FOR ANY ERRORS, DEFICIENCIES, OR OMISSIONS AND SPECIFICALLY DISCLAIM ANY OBLIGATION TO REVISE, MODIFY, OR UPDATE THESE GUIDELINES.

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E. GOVERNMENT REGULATIONS: THESE GUIDELINES DO NOT SUPERCEDE ANY RULES OR REGULATIONS ESTABLISHED BY INDIVIDUAL STATE BOARDS OF COSMETOLOGY OR OTHER GOVERNMENTAL AGENCIES.

APPENDIX

Cosmetic Ingredient Review Conclusion on AHAs

Based on the available information included in this report, the CIR Expert Panel concludes that Glycolic and Lactic Acid, their common salts and their simple esters, are safe for use in cosmetic products at concentrations „T 10%, at final formulation pH „d 3.5, when formulated to avoid increasing sun sensitivity or when directions for use

include the daily use of sun protection. These ingredients are safe for use in salon products at concentrations up to 30%, at final formulation pH up to 3.0, in products designed for brief, discontinuous use followed by thorough rinsing from the skin, when applied by trained professionals, and when application is accompanied by directions for the daily use of sun protection.

For the full CIR Decision, please contact the Esthetics Manufacturers and Distributors Alliance on 312.245.1595