

Petition for Declaratory Ruling- head spa services being within my scope of practice

To the NH Board of Estheticians,

I am writing to provide further clarification on my qualifications to perform head spa treatments, as I believe the process I follow is highly aligned with the standards and practices for estheticians, ensuring a safe and effective treatment for my clients.

As an esthetician, my approach to head spa treatments mirrors the traditional facial process. I begin by analyzing the scalp using a magnifying machine, much like I would with facial skin. This allows me to identify areas of concern, such as dry skin, sun damage, or blemishes on the scalp. As an electrologist, I am very familiar with looking at skin magnified.

The treatment consists of:

1. **Cleansing** – I cleanse the scalp to remove product buildup or impurities.
2. **Exfoliation** – I gently exfoliate the scalp to remove dead skin cells.
3. **Steam towel** – I apply a warm steam towel to soften and relax the scalp.
4. **Moisturizing** – I apply a hydrating product to the scalp.

A gentle massage is used to apply the products, but this is focused on applying product rather than a full therapeutic massage. To enhance relaxation, I incorporate aromatherapy, sound therapy, and an eye mask.

Afterward, I towel dry the hair to complete the service.

The products I use are professional grade Biolage Scalp Sync, which are specially formulated for scalp health and contain ingredients similar to those used in facial skincare. I also use a waterfall circulation halo, which I clean in accordance with the same sanitation standards required for circulation pedicure stations. I follow a strict cleaning protocol after each client, using a bleach and dishwasher powder solution for 10 minutes, followed by a rinse with clean water. I document every time it is cleaned in a notebook, as per the guidelines. All tools are scrubbed with soap and water and soaked in Barbicide for 10 minutes.

I have been practicing as an electrologist for 24 years, and as an esthetician for 2 years in good standing. I am also a certified laser technician and the shop manager of my own spa, Water Lily Wellness Collaborative, where I uphold the highest standards of care and sanitation for my clients.

In addition to my esthetic training, I have received certification in head spa treatments through Katie Alyse' Scalp and Soul program based in California, which has provided me with the specialized knowledge needed to safely and effectively perform these services.

It's important to note that estheticians perform facials on a variety of areas of the body, other than the face, including back facials, vajacials, and even mommy-to-be belly facials. These services are very similar to head spa treatments in that they involve skincare and sanitation protocols, and they are provided safely and effectively by trained estheticians. Head spa treatments, therefore, are no different and fall well within the scope of an esthetician's practice.

Massage therapists, on the other hand, typically do not have the same level of training in sanitation or skincare conditions, which are critical for performing head spa treatments safely. It is my opinion that massage therapists do not have the proper qualifications and should not be performing head spa treatments.

I understand that head spa treatments are a relatively new service in New Hampshire, and there are currently no specific regulations for them. However, I assure you that I am adhering to the highest standards of care, sanitation, and safety.

If you would like any additional information, including videos of my procedures or other supporting materials, I would be happy to provide them.

Thank you for your time and consideration.

Sincerely,

Lisa M Church L.E.

LisaMChurch56@gmail.com

603-361-6647

Owner/Manager, Water Lily Wellness Collaborative

261 Sheep Davis Rd Suite G

Concord, NH 03301

Esthetician license #37877, Electrologist license #254, Shop license #5604