



The Honorable Tyrone Carter
Chair, House Regulatory Reform Committee
P.O. Box 30014
Lansing, MI 48909-7514

Subject: Opposition to HB 5683 and 5684 as Written

Dear Chairman Carter,

We are writing on behalf of the Michigan Medical Spa Association (MISPA) to express our concerns with HB 5683 and HB 5684, sponsored by Rep. Tullio Liberati. While we oppose these bills in their current form, we would adopt a neutral stance with the following suggested amendments:

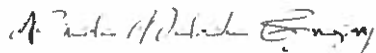
- 1. Dermaplaning and Microdermabrasion:** These procedures can be considered invasive and should either require supervision by a physician or be limited to superficial depths (stratum corneum).
- 2. High Frequency Devices:** The current definition is vague and could encompass a broad range of devices. We propose defining them as external devices that do not penetrate beyond the stratum corneum, or allowing their use under physician supervision only.
- 3. Practice of Medicine:** The bills allow estheticians to offer services that could be interpreted as medical. To clarify, all products, services, and energy devices/machines used should be categorized as non-medical grade unless supervised and approved by a physician. Medical grade products, services, or devices should strictly require physician oversight and approval.
- 4. Alternative Proposal:** Rather than these bills, MISPA suggests establishing a category of advanced estheticians who would receive specialized training in medical

services. These professionals would work under the supervision of a physician, filling a critical need in the medical spa industry and meeting employer demand.

Thank you for considering our proposed amendments. We believe these changes will address concerns regarding patient safety and regulatory clarity, while supporting innovation in the esthetic industry.

Sincerely,

Nicole Gregory
President, MISPA



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