From: [redacted]
To: Daurio, Joseph (DOS)
Subject: Fw: Request for Scope Review – Controlled Microchanneling at 0.25mm
Date: Tuesday, March 3, 2026 4:20:20 PM
Attachments: Exhibit 2 - Exeutive Summary.pdf
Exhibit 1- FDA Classification.pdf

You don't often get email from [redacted] Learn why this is important

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Leeanne Shade
Licensed Cosmetologist | Licensed Barber
Salon Owner | Educator | Industry Advocate | NYS Appearance Enhancement Committee
Choices Hair Studio
[redacted] | [redacted]
http://www.choiceshairstudio.com | @choiceshairstudio
[redacted]

Hi Joe,
This woman woman contacted me in regards to this service-she lives in Long Island. I mentioned it to Whitney Clark and she said we could have it examined by something to with the medical board as to the validity of the claims. I do think it is something that could be a great service to many people who sit in our chairs who have thinning hair but we obviously are not allowed to do this currently.
She is also going to send an expert opinion letter from Dr Schwartz at some point as to why it is would not be a danger to the consumer because of the depth of the microchanneling.
Thank you
Leeanne
I will also forward you the shampoo certification recommendations because I believe I have in our google docs what we had all decided upon and Dana has not yet sent it.

----- Forwarded Message -----
From: Laura Volpe [redacted]
To: [redacted]
Sent: Monday, February 23, 2026 at 06:22:17 PM EST
Subject: Request for Scope Review – Controlled Microchanneling at 0.25mm

Dear Esteemed Members of the New York State Board,

My name is Laura C. Volpe, CHLP. I am a New York State Licensed Cosmetologist, a Licensed Tattoo Artist who performs scalp micropigmentation (SMP), and a Certified Hair Loss Practitioner in trichology. I am the founder of ManeInk HairLoss Solutions, where I have a hairloss clinic and scalp spa where I bridge the gap between healthcare and haircare.

I am writing to respectfully request a formal review of the scope of practice for licensed cosmetologists and estheticians in New York State as it relates to controlled microchanneling at a maximum depth of 0.25mm.

I am including scientific documentation and safety data provided by Dr. Mitchell Schwartz, founder of the ProCell Microchanneling device, in support of this request.

Current Regulatory Framework

Under existing New York State regulations:

- An individual may obtain a tattoo license without holding a cosmetology license.
- That tattoo license permits the performance of scalp micropigmentation (SMP).
- Scalp micropigmentation involves controlled needle penetration typically ranging from 1.5–2.0mm, extending past the epidermis and depositing pigment within the dermal layer of the scalp.

This means that an individual operating under tattoo licensure may legally penetrate into the dermis at depths of 1.5–2.0mm.

Conversely:

- Licensed cosmetologists and estheticians — who complete over 1,000 hours of state-mandated education in sanitation, anatomy, infection control, and skin physiology — are not permitted to perform microchanneling at 0.25mm.
- Microchanneling at 0.25mm does not reach the dermal layer.
- The ProCell device is mechanically engineered with fixed-depth control mechanisms that prevent penetration beyond the designated depth.

This creates a regulatory paradox: deeper dermal penetration is permitted under tattoo licensure, yet a controlled, superficial procedure at 0.25mm remains outside the scope of licensed cosmetologists and estheticians.

Inclusion of Estheticians and Facial Treatments

This concern extends beyond the scalp.

Consumers are increasingly seeking facial rejuvenation and regenerative skin treatments. In the absence of clearly regulated pathways, individuals often pursue services in settings such as med spa's where device standards, practitioner education, and depth control may vary.

Licensed estheticians are extensively trained in skin physiology, sanitation, and facial treatment protocols. Allowing controlled microchanneling at a maximum depth of 0.25mm — under defined regulatory standards — would provide a compliant alternative rooted in licensed professional education.

Distinction: Microchanneling vs. Microneedling

It is important to clarify that ProCell microchanneling is not traditional microneedling.

- It does not drag or tear the skin.
- It creates uniform, controlled microchannels.
- It is engineered to prevent excessive depth.
- It does not allow uncontrolled penetration.
- It is safe across skin tones and ethnicities when properly performed.

This is a mechanically controlled device designed for superficial cosmetic stimulation and enhanced topical absorption — not dermal injury or medical intervention.

Proposal for Evaluation and Formal Recognition

Based on the comprehensive documentation provided by Dr. Mitchell Schwartz, founder of ProCell, and the device's engineered depth-control safeguards, I respectfully request that the Board evaluate ProCell for formal recognition as the only approved controlled, depth-limited 0.25mm microchanneling device within New York State's cosmetology and esthetics framework.

Both the ProCell company and I, along with Dr. Mitchell Schwartz, are fully willing to participate in in-person demonstrations, technical review sessions, or formal meetings to provide detailed clarification regarding the device's mechanics, fixed-depth controls, and safety protocols.

Public Safety Consideration

Every day, women and men sit in licensed cosmetology and esthetics chairs expressing concerns about:

- Hair thinning
- Scalp conditions
- Skin texture
- Collagen decline

Licensed professionals with over 1,000 hours of education are often the first point of contact. Establishing a compliant pathway for controlled 0.25mm microchanneling would:

- Align regulation with practitioner education

- Provide clear depth limitations
- Reduce ambiguity in practice settings
- Support consumer protection through oversight

This is an advocacy for safer, more compliant device integration within licensed practice — not expansion beyond reasonable limits.

I respectfully request that the Board review the attached documentation and consider opening formal discussion on this matter. I welcome the opportunity to provide further clarification or participate in any evaluative process deemed appropriate.

Thank you for your time and consideration.

Respectfully,

Laura C. Volpe, CHLP
Licensed Cosmetologist – NYS
Licensed Tattoo Artist – NYS
Certified Hair Loss Practitioner
Founder, ManeInk HairLoss Solutions
www.maneinkny.com