“Disinfection, Cleaning, and Safe Work Practices” in Colorado for Esthetics School at VKMD Institute of Medical Aesthetics:

Under Colorado regulations for esthetics schools and licensing (found in the Code of Colorado Regulations), “Disinfection, Cleaning, and Safe Work Practices” are mandated curriculum and infection-control standards required to protect public health and safety.

Key Definitions and Standards:

- **Cleaning:** washing or scrubbing surfaces with liquid soap and water, detergent, antiseptics, or using an ultrasonic cleaner/solvent to physically remove all visible or surface debris. **Cleaning is NOT disinfection** and does not make multi-use items safe for client use on its own.
- **Disinfection:** The chemical destruction of pathogens on nonliving surfaces and implements to render an item safe for handling, use, and disposal. It requires an EPA-registered hospital-grade disinfectants used per manufacturer instructions or an approved daily bleach solution (minimum ¾ cup bleach per gallon of water with a 10-minute contact time). **Disinfection is NOT cleaning** and must be preceded by a cleaning step.
- **Safe Work Practices:** Mandatory hygiene and operational protocols for esthetician students and licensees. This includes maintaining clean and disinfected tools, properly separating clean and dirty linens/tools, using single-use disposables properly, employing good personal hygiene, and refusing service on clients with contagious conditions, inflamed skin, or open wounds without a physician’s written authorization.

Under the Colorado Office of Barber and Cosmetology Licensure guidelines (regulated under 4 CCR 731-1), ***high-touch areas*** *refer to the surfaces, tools, and electronics that experience frequent hand contact from multiple people throughout the day.*

Because these areas present the highest risk for cross-contamination and the spread of pathogens, Colorado rules require targeted cleaning and disinfection protocols.

Identifying High-Touch Areas in Esthetics:

1. **Treatment & Station Areas (cleaned/disinfected between every client):**
    - Esthetic beds, chairs, and stools (specifically headrests, armrests, and adjustment levers).

- Magnifying lamps, facial steamers and their knobs/toggles, 13-function machine handpieces, knobs, etc. LED devices, Woods lamps, Moisture detectors, high frequency wants, etc.
- Product Containers, bottles, pumps, bowls, spatulas, hand-held mirrors, and anything else pertaining to performing services on clients and the touching of products used for the service.
- Trolleys, carts, countertops where tools are resting, the dispensary area, and anywhere else products and service supplies are stored and handled by people.
- Lids of multi-use jars, the outer rims and caps of large wax pots, mask jars, and scrub containers
- Floors where services are performed and where clients are present for service
- Trash bins in service areas
- Any designated areas for product dispensing, storage of tools and devices used during services, cosmetics and supplies to apply makeup, sanitation stations for tool immersion, etc.
- Clinic/service room floors: sweep and mop

2. **Public and Common Areas (Cleaned/disinfected frequently throughout the day):**
    - Door handles, push plates, light switches, levers, knobs
    - Reception counters and waiting room area tables and chairs where clients fill out forms, wait for service, check-in and check-out
    - Retail area such as displays, testers, cabinet and handles, floors and trash bins where clients are designated to complete their intake forms, schedule appointments, choose retail products to purchase, etc.
    - Restroom fixtures including faucets, handles and levers, countertop, paper towel dispenser, soap and lotion dispensers, etc. Restock necessity items such as paper towels, soap, lotion, and toilet paper.
    - Kitchenette fixtures such as the handles of the refrigerator and microwave, sink fixtures, and any areas designated for disinfecting and cleaning of tools.
    - Sink faucets and handles where students and clients wash their hands, rinse mixing bowls, and fill steamers
3. **Shared Electronics and Point-of-Sale (POS) Systems:**
    - Tablets, iPad, payment terminals requiring client signatures or touch
    - Shared keyboards, mice, phones, staplers, clip boards, etc. that are frequently touched

- **Laundry and Storage Areas:**
- Clean and soiled bin lids, handles or push flaps of designated bins sued to separate dirty linens from clean laundry
- Cabinet knows and drawer pulls
- Washer/Dryer Interfaces, dials, buttons, and handles of the school's laundry machines used to wash sheets and towels
- Fold and put away clean linens

4. **Classroom and Practical Theory Spaces:**

- Mannequin heads and stands: the plastic surfaces of practice mannequins and the adjustment clamps secured to desks
- Shared Student Desks and Chairs, Table surfaces, armrests, treatment model areas and student "give and get" service areas, with all equipment and products

Golden Rules for Colorado Student Compliance:

Under Colorado Office of Barber and Cosmetology Licensure Rule 4 CCR 731-1.7, beauty schools and salons must maintain strict daily sanitation logs. To structure student responsibilities fairly, esthetics programs organize tasks into a Daily Sanitation Rotation List, broken down by shift intervals.

1. **The Order Matters**: Every rotation list item must explicitly require two distinct steps—**Clean first** (remove visible dirt and oils), then **disinfect second** (kill pathogens)
2. **No Wet Leaving**: Students are legally barred from leaving a station dirty. All sanitation must happen immediately after service.
3. **Log it**: The Colorado State Board requires schools to keep records of daily and weekly procedures. Students must sign off on their assigned rotation before checking out.

Treatment stations and areas related to individual client services/treatments are cleaned and disinfected between every client and performed by the individual student assigned to that treatment room/station.

End-of-Day assigned Sanitation Rotation student duties are assigned to students for the last 30 minutes of each day to keep high-traffic communal zones compliant throughout the school day and to prepare the clinic floor for the following day.

How do student sanitation duties relate to student education and why are they necessary?

In Colorado, learning and performing these daily sanitation rotations is not considered "busywork" or manual labor—it is a ***core academic and legal requirement*** *of an esthetician's education.*

Here is exactly how these sanitation rotations connect directly to a student's schooling and future career:

1. **It is a Mandated State Board Curriculum Requirement:**
    - The Colorado Office of Barber and Cosmetology Licensure establishes the exact number of hours a student must complete to graduate.
    - Out of the total hours required for and esthetician license, a specific block of hours is legally allocated to "**Disinfection, Cleaning, and Safe Work Practices".**
    - Performing daily rotations counts directly toward these mandatory practical clock hours. If a school does not teach and document these practices, they are in violation of state educational standards.
2. **It Bridges the Gap Between Theory and Practice:**
    - In the classroom, students learn the science of **bacteriology, virology**, and **immunology.** They memorize how pathogens spread and how chemical disinfectants work on a cellular level.
    - The daily sanitation rotation is the physical application of that science.
    - It teaches students how to read chemical labels, calculate dilution ratios, understand proper **dwell (contact) times**, and recognize the physical difference between cleaning (removing dirt) and disinfecting (killing microbes).
3. **It Prepares them for the Practical State Board Exam:**
    - To get licensed in Colorado, students must pass a rigorous examination. A massive portion of this exam evaluates **Infection Control and Safety Practices.**
    - Examiners watch students like a hawk to ensure they do not cross-contaminate their stations, that they sanitize their hands before touching a client, and that they properly handle dropped items.
    - By doing these daily rotations at school, the muscle memory required to pass the state board exam becomes second nature.
4. **It Teaches Business Compliance and Liability Management:**
    - When a student graduates and enters the workforce—whether they rent a booth, work in a medical spa, or open their own business—they are personally liable for public safety.

- **Malpractice and fines**: failing to maintain these standards can result in hefty fines from Colorado state inspectors, a suspended license, or lawsuits if a client contracts a bacterial infection (like MRSA) or a fungus.
- **Time Management:** In a real spa, an esthetician must flip a room, clean their tools, and disinfect high-touch surfaces in the 15-minute window between clients. The school rotations teach students how to manage their time efficiently without cutting corners on safety.
- Ultimately, Colorado regulations treat infection control as the **foundation of the entire profession**. A student cannot legally or safely perform a chemical peel, microdermabrasion, or a basic facial without first mastering the environment in which those services take place.

What is the difference between student sanitation requirements and exploited janitorial duties?

In a Colorado beauty school environment, there is a strict regulatory and legal distinction between **janitorial tasks** and **student sanitation rotations.**

While both keep the building clean, they serve entirely different purposes under the law. **Students cannot be used as free janitorial labor,** and janitors cannot fulfill the educational, infection-control requirements needed for licensure.

<u>Janitorial Maintenance Duties:</u>

*Janitorial duties focus on **the general physical plant of the school**. These tasks do not require special knowledge of esthetics skin pathogens or esthetic equipment.*

- **Primary Purpose:** General facility upkeep, structural hygiene such as public multi-stall restrooms, shared common area maintenance of commercial buildings, and building safety.
- **Legal Mandate:** Regulated by the Colorado Department of Public Health and Environment (CDPHE) and OSHA.
- **Credit Allocation:** 0 Hours. Fulfills no educational requirements.
- **Target Surfaces:** Public floors, windows, building waste management, and structural facilities
- **Janitorial Scope (facility maintenance):** Structural floors and walls, deep scrubbing and waxing hallways, vacuuming public space lobby, building waste management like hauling garbage to outdoor dumpsters, deep cleaning public bathrooms (VKMD does not have public bathrooms, and only one single person use

bathroom located privately within our suite), facility maintenance such as washing exterior windows, changing HVAC filters, and clearing entryways.

Student Sanitation Rotation:

Student sanitation rotations are explicitly designed to teach the chemical, practical, and clinical standards required to protect the public during a personal service. Students focus on cross-contamination barriers and advanced wellness safety.

- **Primary Purpose**: Educational training, infection control, and licensing exam preparation.
- **Legal Mandate:** Regulated by the Colorado Office of Barber and Cosmetology Licensure (4 CCR 731-1).
- **Credit Allocation:** Counts toward required clock hours under "Disinfection, Cleaning, and Safe Work Practices".
- **Target Areas:** High-touch zones, advanced modalities, tools, and immediate treatment stations.

Under Colorado cosmetology and esthetics rules, the **client waiting area and high-traffic transitions are legally considered part of the licensed facility's "common active areas".** This means infection control rules still apply, but the school must split the responsibilities correctly between the students and a janitorial service to remain legally compliant.

The Dividing Line: What is "Clinical" vs "Janitorial" in Public Spaces?

- Janitors clean the structure; ***students disinfect the client touchpoints***
- **High-traffic** areas where students and clients commonly use and touch specific areas and items within those areas are explicitly labeled **"Client Cross-Contamination Barriers"** as opposed to general cleaning.
- Under Colorado Rule 4 CCR 731-1, **maintaining the safety of client common areas** is a licensed beauty professional's job. Learning how to manage **a safe client environment**—from check-in to check-out—is exactly why the state awards students educational clock hours for this sanitation rotation. It ensures the students' future business safe from liability and lawsuits.

The Physical Structure of our school facility:

VKMD Institute of Medical Aesthetics is a private occupational esthetics-only beauty school that is operated in a private suite within a larger commercial building. In this commercial building setup, the DPOS-approved licensed facility stops at the door of our private suite.

- Everything **outside the front door** of our private suite is considered “common area” of the commercial building. Students are NEVER to clean these public areas as the school pays a professional janitor service within their monthly CAM/NNN payments to the building owners to pay for professional janitorial labor.
- **The building’s job**: The property management company hires commercial janitors to vacuum the building hallways, scrub the public restrooms down the hall, wash the building’s front entrance doors, and maintain the general lobby areas.
- **Inside our private suite (Student Sanitation Rotation)**: The moment our students step through the door into the private suite of VKMD Institute of Medical Aesthetics, they are inside the **legally designated clinical space**. The school is responsible for everything inside these walls, and the students are responsible for the client touchpoints within it.
- **The Suite’s Waiting Area**: inside the private suite where student and clients engage, wait, commonly-touch items and spaces, etc. is considered a clinical touchpoint.
- **The Suite’s High-Touch Zones**: The inside door handles, light switches, doorknobs and handles, retail spaces, front desk area, and all electronics, therein are all vectors for cross-contamination.
- **Why it Matters**: The building’s janitorial service will not (and legally should not) enter our private suite to disinfect clinical surfaces. Maintaining the interior of the suite is the direct responsibility of the licensed practitioners (the students and instructors) to ensure compliance with **Colorado Rule 4 CCR 731-1.**
- **The Private Suite Bathroom:** Having a bathroom located inside the private suite is legally considered part of the salon/school floor. However, there is a boundary between clinical disinfection (which students must do for their license) and structural deep cleaning (which paid staff or a janitor should do). Clients and students use this restroom immediately before and after esthetics services/treatments, where they touch their skin, adjust their clothing, and transfer pathogens directly onto the hardware. Therefore, students are responsible for the **hand-to-surface touchpoints** that present a high risk of cross contamination such as countertop, sink and faucet, toilet outer surfaces and flush lever, handicap hand railing on the wall, doorknob, etc.
- **Classrooms:** Students are responsible for the clinical cross-contamination touchpoints of their practice, not the physical building upkeep. Under Colorado Rule 4 CCR 731-1, classrooms where practical theory, mannequin work, and product chemistry are taught are legally part of the licensed educational facility.
- **The Kitchenette:** Breakrooms are one of the highest-risk zones for cross-contamination in a clinical facility. Under Colorado Rule 4 CCR 731-1 and general

health standards, salon/school kitchenettes require strict sanitation because they are the only area where students transition from handling chemical cosmetics, bodily fluids, and skin pathogens to handling food.

- Because students are the exclusive users of the suite's internal kitchenette, they are responsible for the hand-to-surface touchpoints that spread bacteria and viruses between lunch and clinical work. Wiping these areas down trains our students in cross-contamination awareness required for Safe Work Practices.

All other General School Sanitation Guidelines:

- VKMD Institute strives to maintain the highest standard of cleanliness of our facility for our students, staff, and clients. Therefore, in addition to required sanitation rotations and client service sanitations, all students and staff are required to clean up after themselves in the breakroom, kitchenette, classroom, or any personal messes or clutter, etc. daily.
- If any minor item has been left out of this document by mistake, we reserve the right to add anything forgotten at any time and include to our set of current rules and procedures. These would be very minor and therefore are likely items that should "go without saying", yet we will still include to avoid any potential misunderstandings.
- Our goal is to be as clear and transparent as we possibly can, with the expected enthusiasm and spirit of striving for excellence as our main goal at our school and among our student body.
- We send regular reminders and clarifications on a regular basis on our Telegram communications thread regarding proper sanitation practices as well as our standards at VKMD Institute. We make sure that our students are never left to "guess" at what our standards and expectations are at our school and will always explain our procedures and protocols to everyone to ensure our students are properly educated and know how to put these expectations into practice every day.
- All our sanitation duties are directly correlated to the benefit of our students' education and how it is applied to what they are learning in school. All our school rules, policies, and procedures are methodically designed and communicated to our students with the intention of being directly in relation to their education, and what they can expect as esthetics professionals throughout their careers.