HEALTH LICENSING OFFICE
1430 Tandem Ave. NE, Suite 180
Salem, OR 97301-2192
Phone: (503) 378-8667
Fax: (503) 585-9114
Email: hlo.info@odhsoha.oregon.gov
Website: www.oregon.gov/oha/ph/hlo

WHO: **Health Licensing Office (HLO)**
Board of Electrologists and Body Art Practitioners Meeting

WHEN: **9 a.m. Oct. 19, 2026**

WHERE: **1430 Tandem Ave. NE, Suite 180, Salem, OR 97301**

What is the purpose of the meeting?
The purpose of the meeting is to conduct Board business. A copy of the agenda is provided with this notice. Go to https://www.oregon.gov/oha/PH/HLO/Pages/Public-Meetings.aspx for current meeting information.

May the public attend open sessions during meetings?
Yes, members of the public, interested parties, and the news media are invited to attend all board/council meetings.

May the public attend by way of teleconference (call-in) or videoconference?
Yes, options to attend the meetings by teleconference or videoconference will be available through Zoom. See the options below:

Ways to attend:	**How to attend the meeting: (If not attending in person, follow one of the options below)**		
	Join By:	**Meeting or Conference ID:**	**Passcode:**
Zoom Video (audio/video)	**Join the meeting now**	Meeting ID: 165 466 3951	710624
Zoom Audio (audio only)	Dial (669) 254-5252	Meeting ID: 165 466 3951	

May the public provide comments during the meetings?
Public and interested parties' feedback will be heard if available and stated on the agenda. Public comment is limited to matters listed on the meeting agenda or topics relevant to what this Board has statutory authority to regulate. The chairperson and HLO reserve the right to end a person's comment early and have HLO staff mute the public member if the comment is disruptive or does not pertain to matters listed on

Revised

the meeting agenda or topics relevant to what this Board has statutory authority to regulate. Comments will not be allowed that are longer than the time allotted.

Instructions for attending a meeting:

- Email your full name to Josh Page at josh.page@oha.oregon.gov and let him know if you would like to make a public comment.
- The HLO asks that individuals attending through video conference keep their cameras off and their phones or microphones muted during the entire meeting until they are given an opportunity to comment during the Public and Interested Parties Feedback period.
- Representatives of the news media who are interested in attending an executive session are asked to contact Josh Page at josh.page@oha.oregon.gov to make arrangements.

Notification of recording:

The meeting will be recorded. By attending this meeting, you consent to being recorded. The recording may include any information associated with you while attending the meeting, such as your voice, image, name, and phone number. The final video recording of the meeting will be posted to the HLO YouTube Channel. By attending this meeting, you consent to the public display of any information associated with you in the video recording.

What if the board/council enters into executive session?

Prior to entering executive session, the board/council chairperson will announce the nature of and the authority for holding an executive session. Board/council members, designated participants such as staff, and representatives of the news media shall be allowed to attend the executive session. All other audience members are not allowed to attend the executive session. Audience members attending the board/council meeting through video conference will be in an electronic room separate from the board/council during executive session. Audience members may choose to disconnect during executive session and later rejoin the board/council meeting. Anyone joining the meeting while the board/council is in executive session will be placed in an electronic room separate from the board/council and rejoined when the board/council returns to open session. The board/council will return to open session before taking any final action or making any final decisions.

Who do I contact if I have questions or need special accommodations?

If you have any questions about accommodations or need assistance to participate, please contact Josh Page at josh.page@oha.oregon.gov, or by calling (503) 934-0720; or Krissy Pickett at krissy.pickett@oha.oregon.gov, or by calling (503) 378-2093. All relay calls are accepted.

Revised

Item for Board Action

Approval of Agenda

Health Licensing Office
Board of Electrologists and Body Art Practitioners
1430 Tandem Ave. NE, Suite 180, Salem, OR 97301

9 a.m. Oct. 19, 2026

1. **Call to Order**

2. **Item for Board Action**
   - ♦ Approval of Agenda

3. **Introductions** – Interim Director Megan Lockwood

4. **Items for Board Action**
   - ♦ Approval of 2027 meeting dates
   - ♦ Approval of 2027 chair and vice chair

5. **Reports**
   - ♦ Director's Report
     Board Membership, Training, Resources & Membership Information
   - ♦ Licensing and Fiscal Statistics
   - ♦ Regulatory Statistics
   - ♦ Continuing education audit
   - ♦ Standard body piercing exam update

6. **Executive Session:** Pursuant to ORS 192.660(2)(f), and ORS 192.355(9)(a), and ORS 40.225 for the purpose of considering information exempt from public disclosure. (Legal advice)

7. **Policy** - petition for rulemaking to amend OAR 331-910-0024

8. **Item for Board Action**
   - ♦ Vote on petition for rulemaking

9. **Public/interested Parties' Feedback**
   - ♦ Letter from association

10. **Other Board Business**

Revised

Introductions

Items for Board Action

2027 Meetings

2027 Meeting Dates

Issue:

The Board must approve 2027 meeting times and dates. The Health Licensing Office proposes:

- 9 a.m. Feb. 22
- 9 a.m. Oct. 16

Board Action:

The Board approves the 2027 meeting times and dates:

2027 Chair and Vice Chair

2027 Chair and Vice Chair

Background and Discussion:

Audrey Jones has served as chair and Paul Thomas has served as vice chair for the Board of Electrologists and Body Art Practitioners during 2026.

Issue:

The Board must nominate and elect a chair and vice chair for 2027.

Role of the chair in meetings

- Officially call the meeting to order.
- Keep order and impose any necessary restrictions for the efficient and orderly conduct of the meeting.
- Direct the "flow" of the meeting and to ensure the meeting is conducted in a professional manner. Some key points regarding meeting protocol include:
  - Board members wishing to speak must wait to be addressed by the chair.
  - Once addressed by the chair, the Board member must state their last name for the record before speaking.
  - The chair guides members through the motion-making process.
  - If public comment is being accepted by the Board, audience members must wait to be addressed by the chair and state their full name and affiliation to the Board.
- Officially enter/exit executive session.
- Officially adjourn the meeting.

Board Action:

The Board nominates and elects:

Chair:
Vice chair:

Director’s Report

Date: October 19, 2026

To: Stakeholders and Interested Parties

From: Krissy Pickett, Executive Assistant

Subject: Board of Electrologists and Body Art Practitioners – Board Member Recruitment

Board Member Background

The Board of Electrologists and Body Art Practitioners (Board) is made up of 7 members including 2 tattoo artists, 2 body piercers, 1 electrologist, 1 healthcare provider and 1 public member. Members are appointed by the Governor's Office of Executive Appointments based on qualifications set forth in Oregon Revised Statute (ORS)690.401, experience and demographics to ensure an accurate representation of the profession(s) and the state of Oregon.

Recruitment Process

The Health Licensing Office (HLO) utilizes licensing databases, interested parties contact lists, press releases and professional/community outreach to fill vacant council member positions. Applications are reviewed by the Governor's Office monthly and qualified candidates are notified of their appointment status.

Term Limits and Reappointment Process

Board members are appointed to a four-year term and have the option of serving two full terms. Individuals whose first term limit is less than half of a full term (less than 2 years) have the option of serving the abbreviated term, and an additional two full terms. Prior to the end of an individual's term, the member is provided instructions for reappointment if the member decides to serve again. If the reappointment process is not completed within 90 days of a member's first term ending, that member may be subject to replacement by the Governor's Office.

Board Member Training

Individuals who are appointed to an Oregon Board, Council or Commission are required to complete annual trainings which help to define a member's role and responsibilities while serving and to ensure that the values of the Oregon Health Authority and the state of Oregon are reflected when conducting board business. Training modules include:

DAS – CHRO – Overview of Boards and Commissions (required once per term)
DAS – EIS – Information security Training: Foundations (required annually)
DAS – CHRO – Preventing Discrimination and Harassment (required annually)
OGEC – Overview of Oregon Ethics Law (optional, but recently updated)

Current Board Membership

Board Member/Position	Current Term	Current Term Expiration	Reappointment Status
Audrey Jones Electrologist	2nd Term	3/14/2029	Cannot Reappoint
Paul Thomas Body Piercer	1st Term	6/29/2027	Can Reappoint
Roxanna Tyson Tattoo Artist	1st Term	3/4/2029	Can Reappoint
Nathan Morelli Body Piercer	1st Term	3/28/2027	Can Reappoint
John Dickerson Public Member	1st Term	4/30/2027	Can Reappoint
Rebecca Flaum Tattoo Artist	1st Term	6/30/2029	Can Reappoint
Bryan Goodin Health Care Provider	1st Term	06/30/2028	Can Reappoint

For additional information regarding board member appointments or the application process, please contact Krissy Pickett at krissy.pickett@oha.oregon.gov or (503) 378-2093.

Licensing and Fiscal Statistical Reports

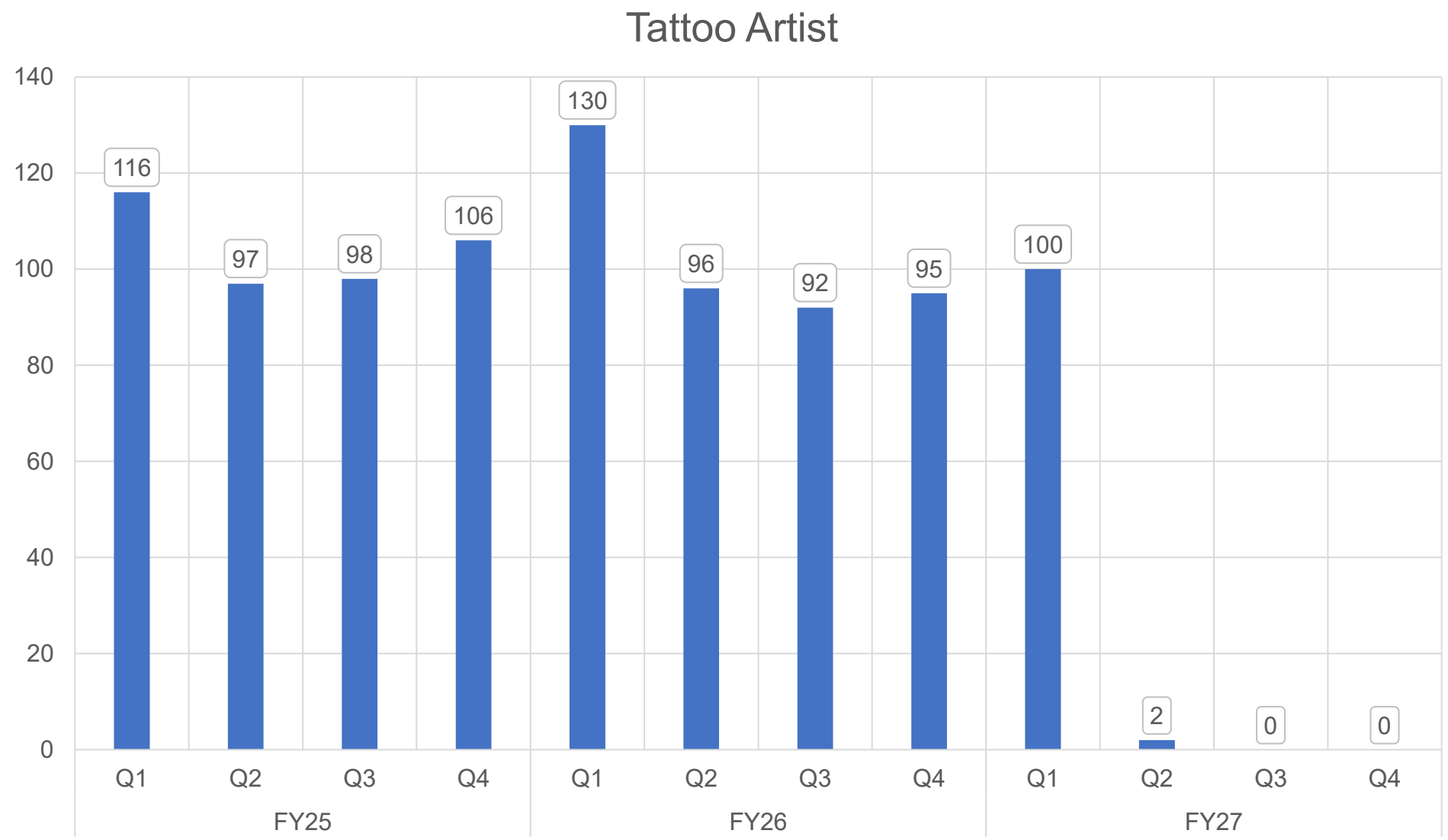
OREGON
HEALTH
AUTHORITY

Health Licensing Office

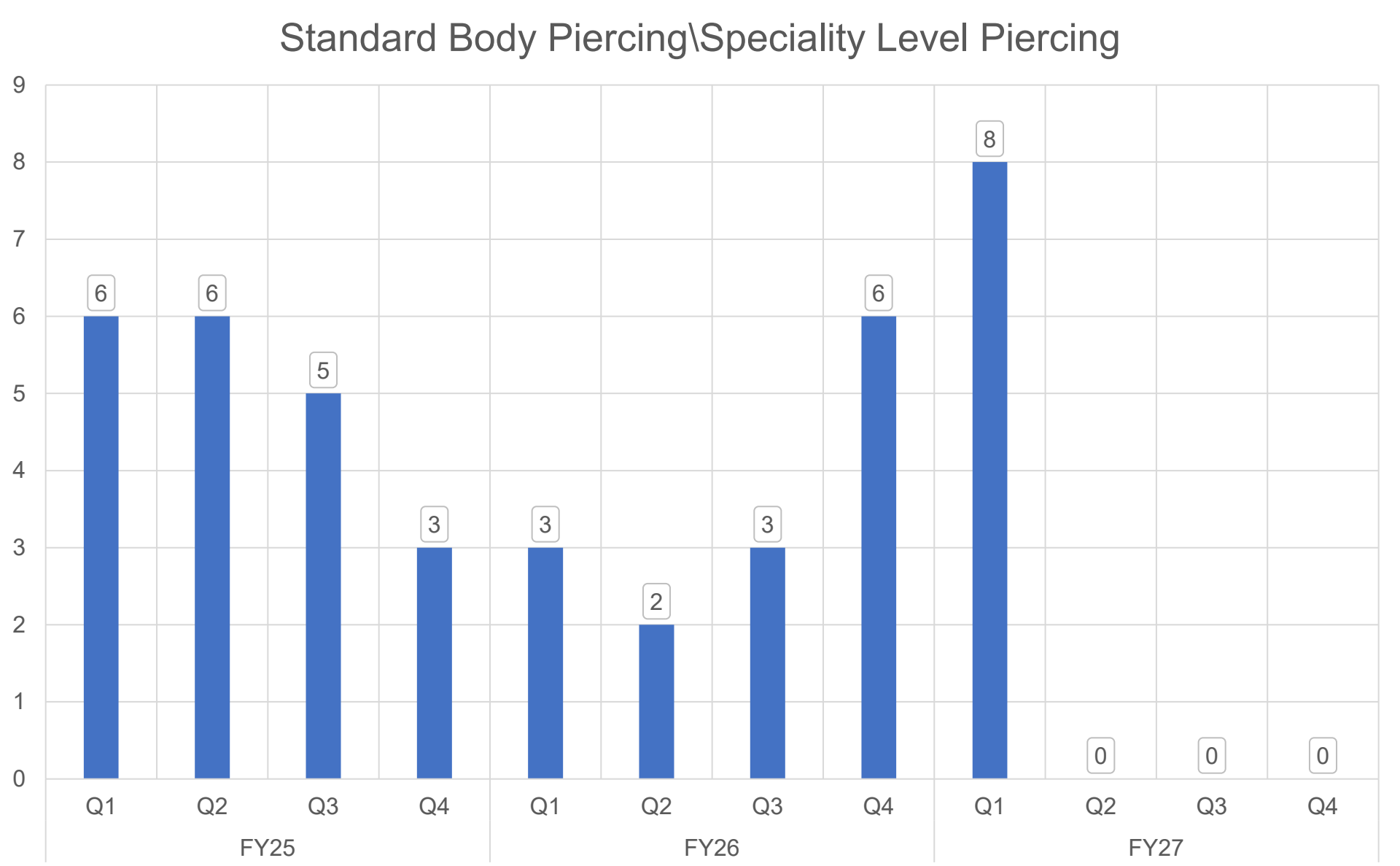
Board of Electrologists and Body Art Practitioners

Board Report

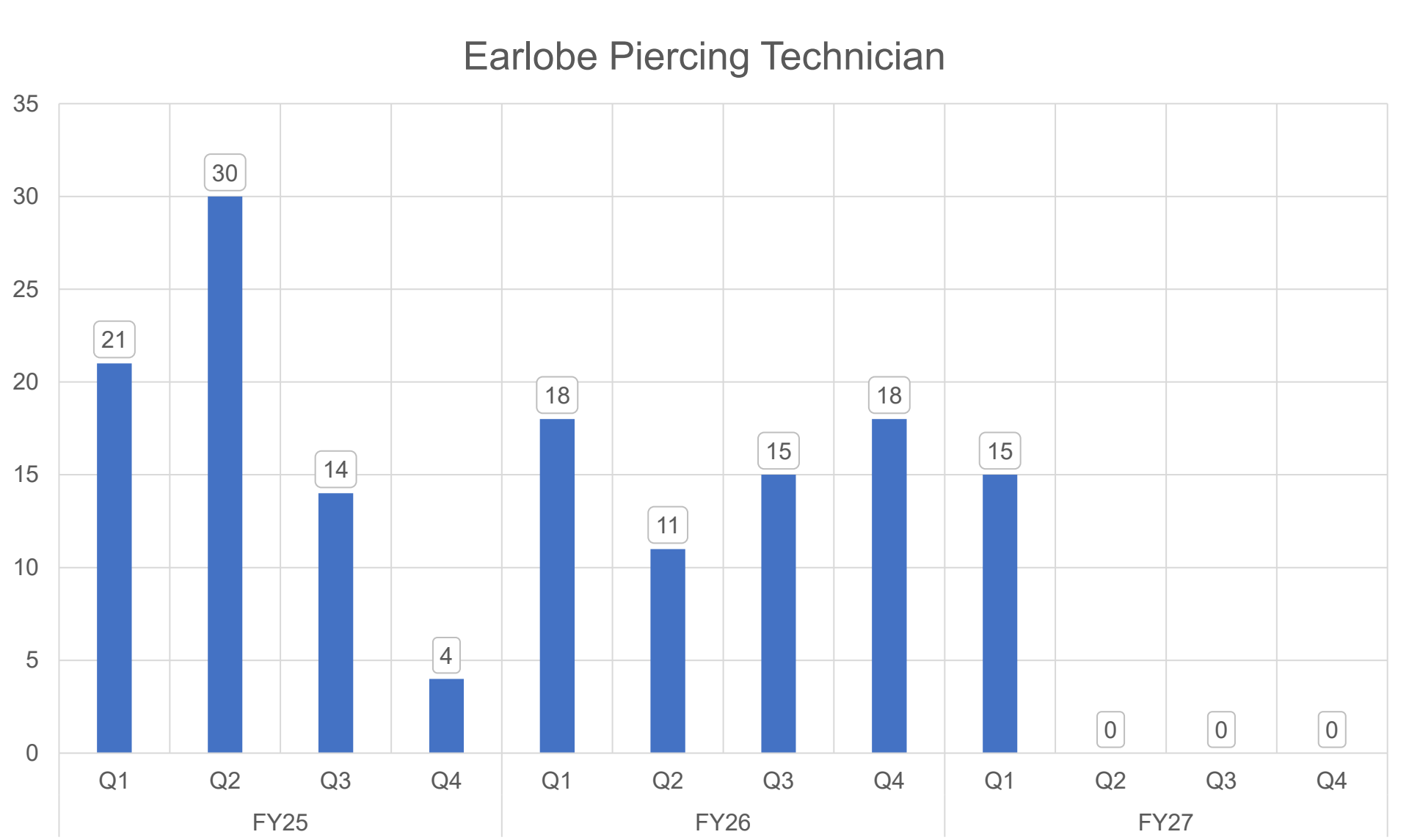
LICENSES ISSUED



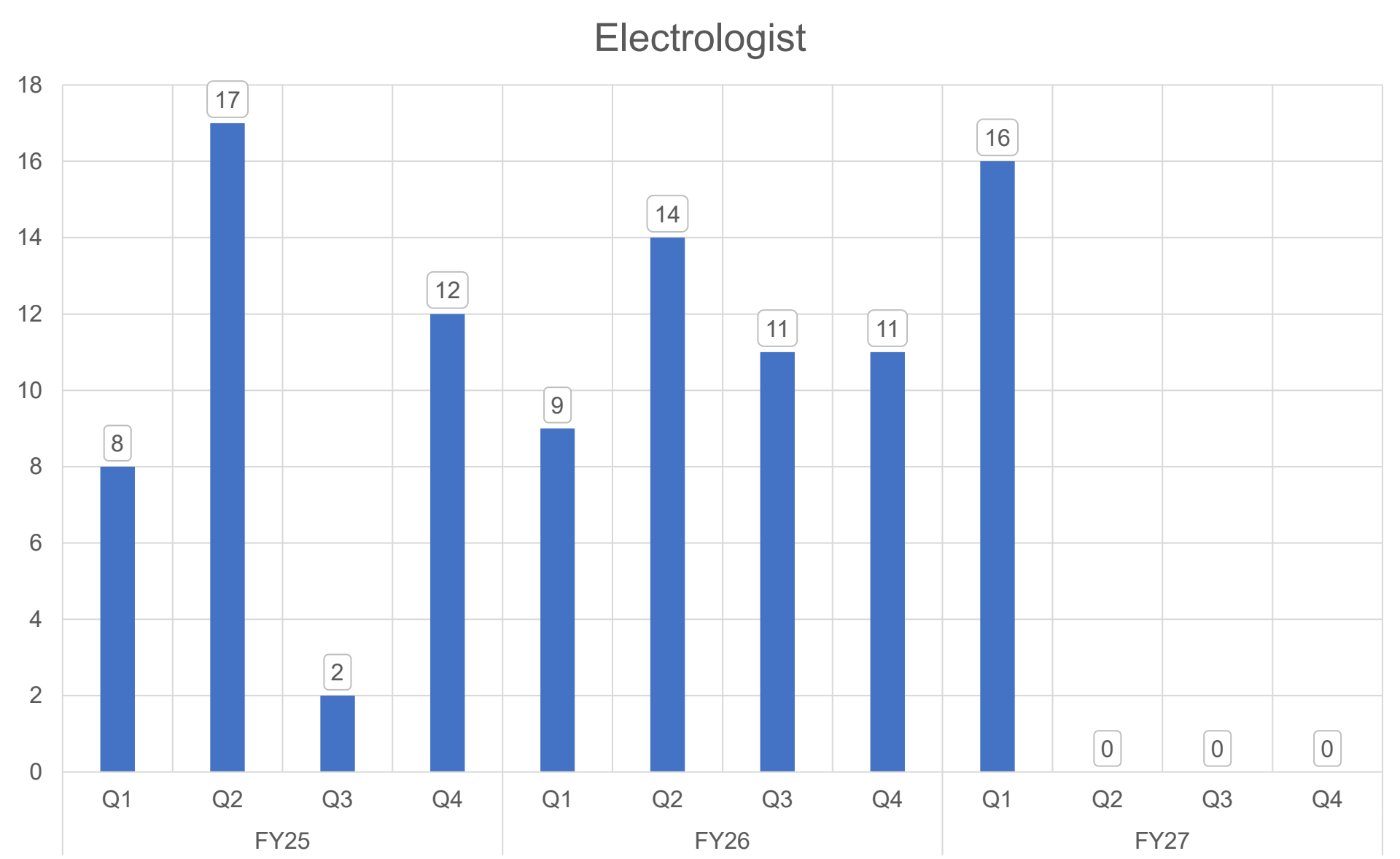
7/1/24 - 6/30/26	FY25	417
7/1/25 - 6/30/26	FY26	413
7/1/26 - 6/30/27	FY27	102
TOTAL		932



7/1/24 - 6/30/26	FY25	20
7/1/25 - 6/30/26	FY26	14
7/1/26 - 6/30/27	FY27	8
TOTAL		42

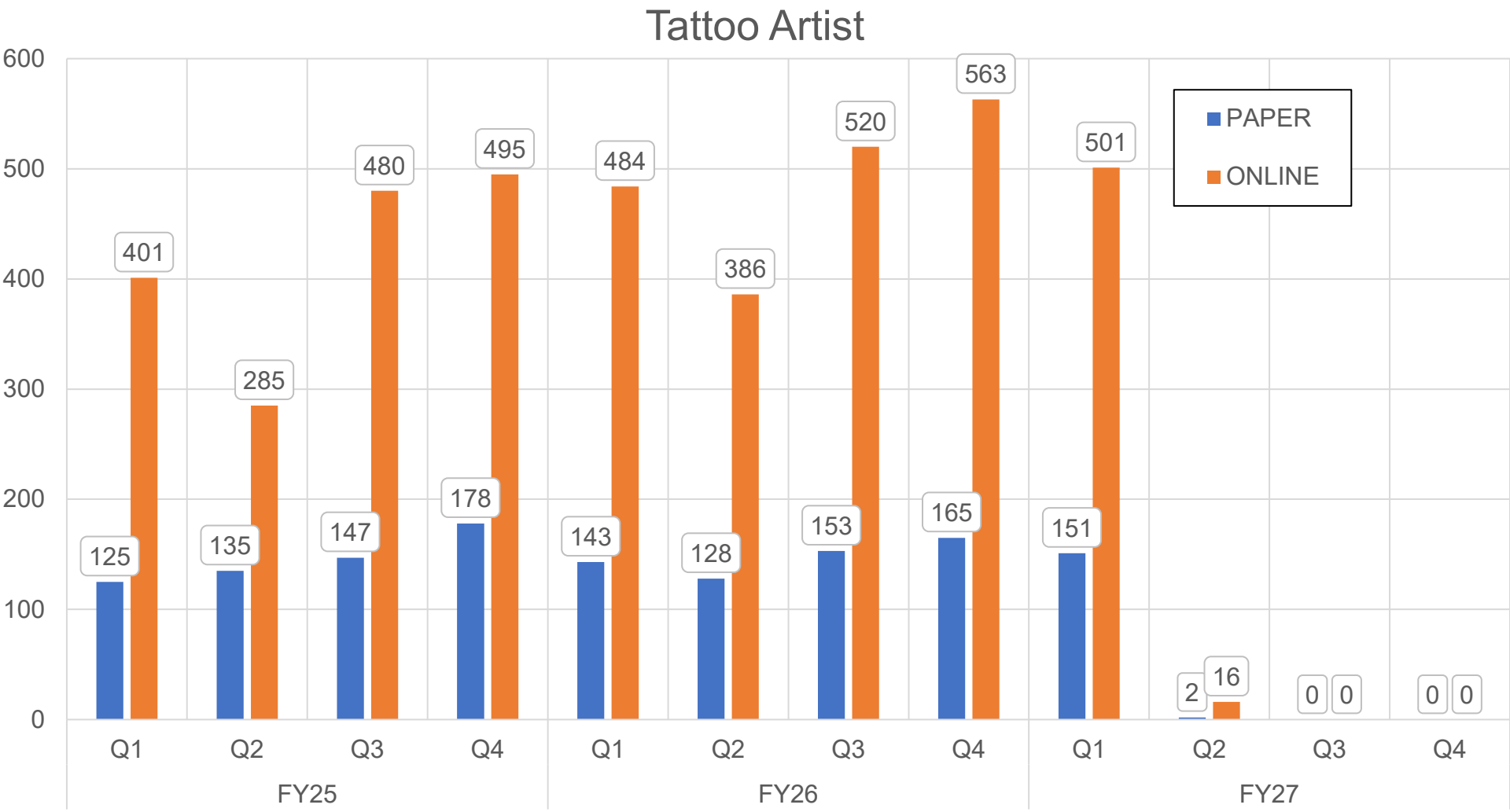


7/1/24 - 6/30/26	FY25	69
7/1/25 - 6/30/26	FY26	62
7/1/26 - 6/30/27	FY27	15
TOTAL		146

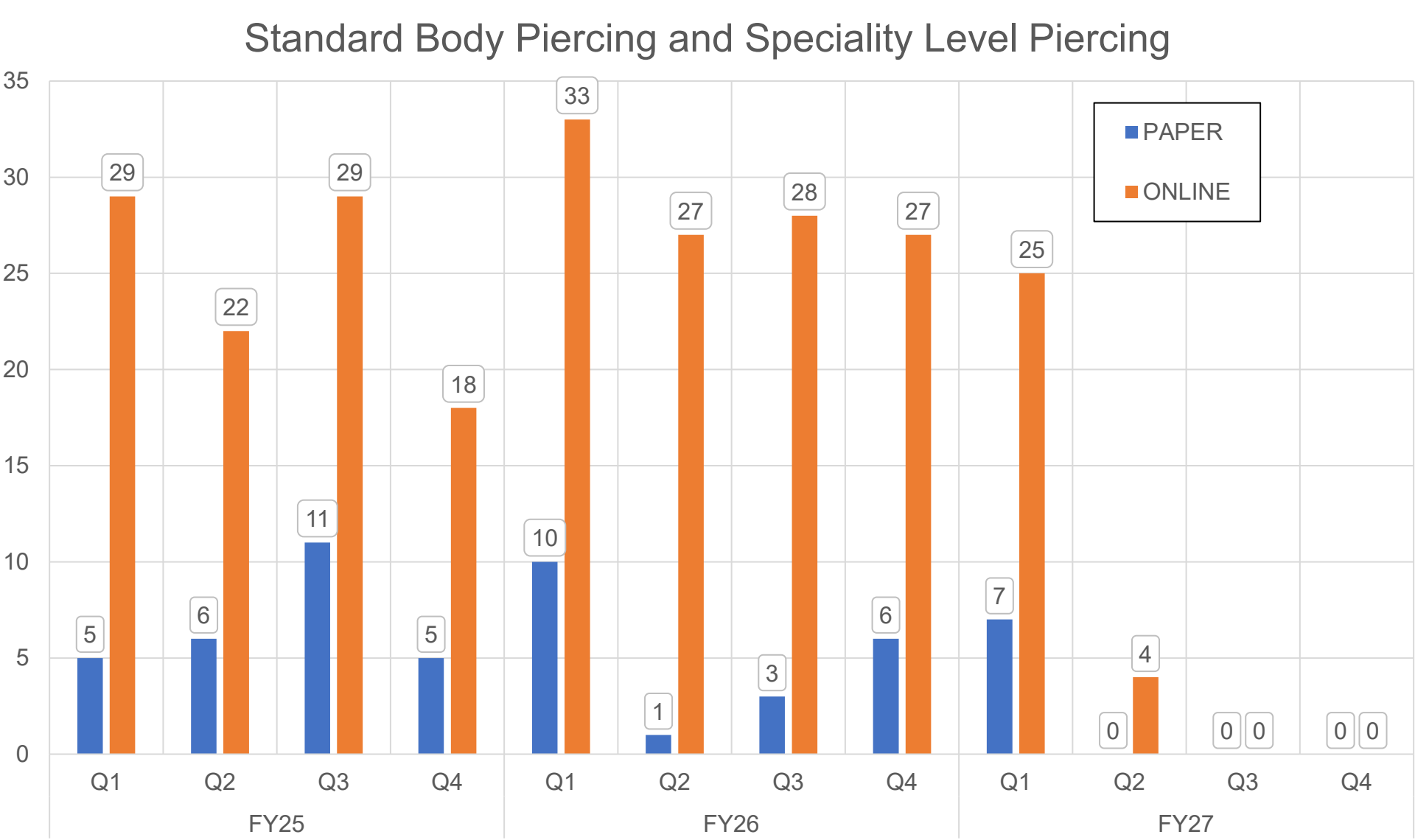


7/1/24 - 6/30/26	FY25	39
7/1/25 - 6/30/26	FY26	45
7/1/26 - 6/30/27	FY27	16
TOTAL		100

LICENSES RENEWED

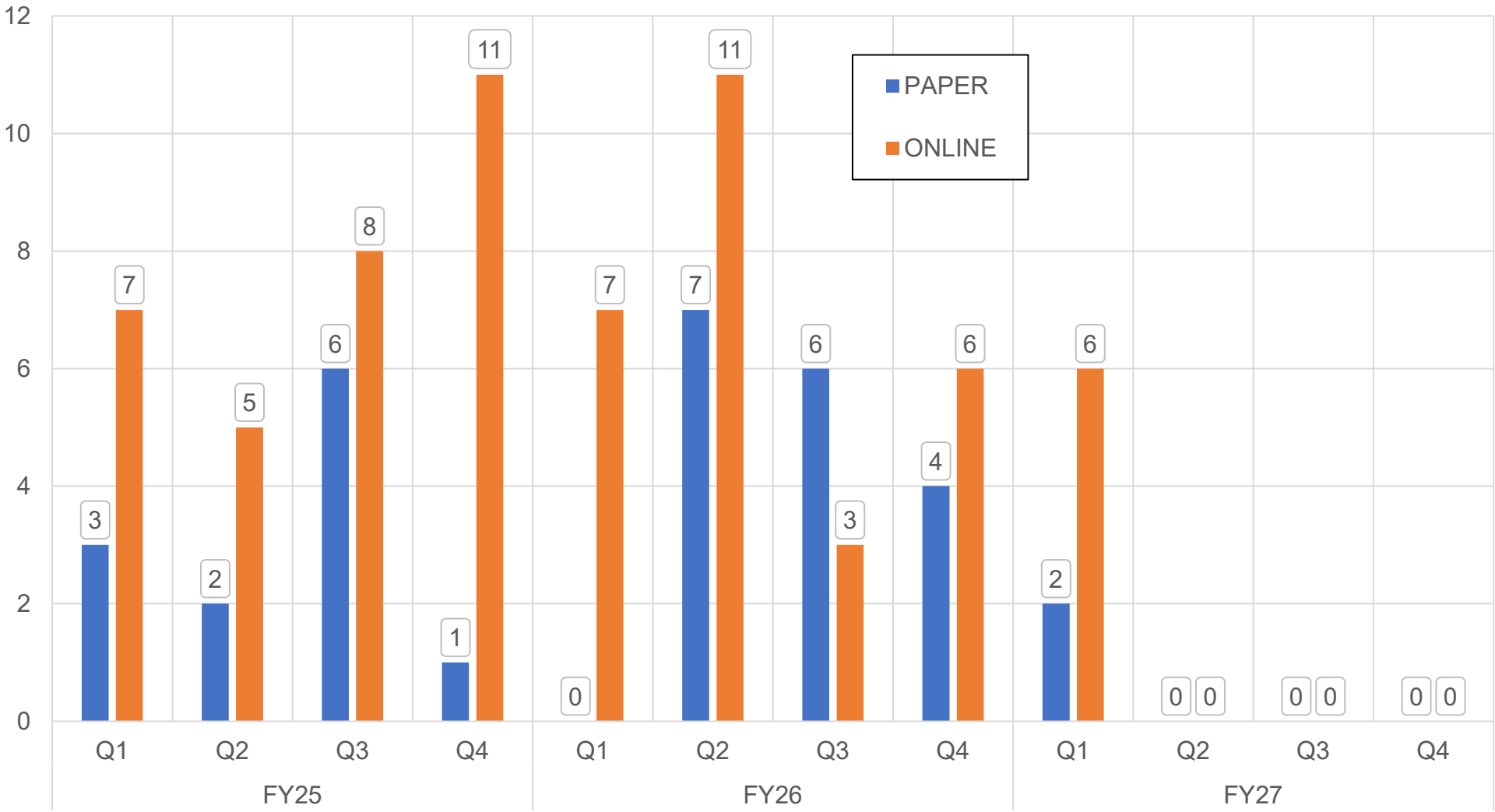


7/1/24 - 6/30/26	FY25	2246
7/1/25 - 6/30/26	FY26	2542
7/1/26 - 6/30/27	FY27	671
TOTAL		5459

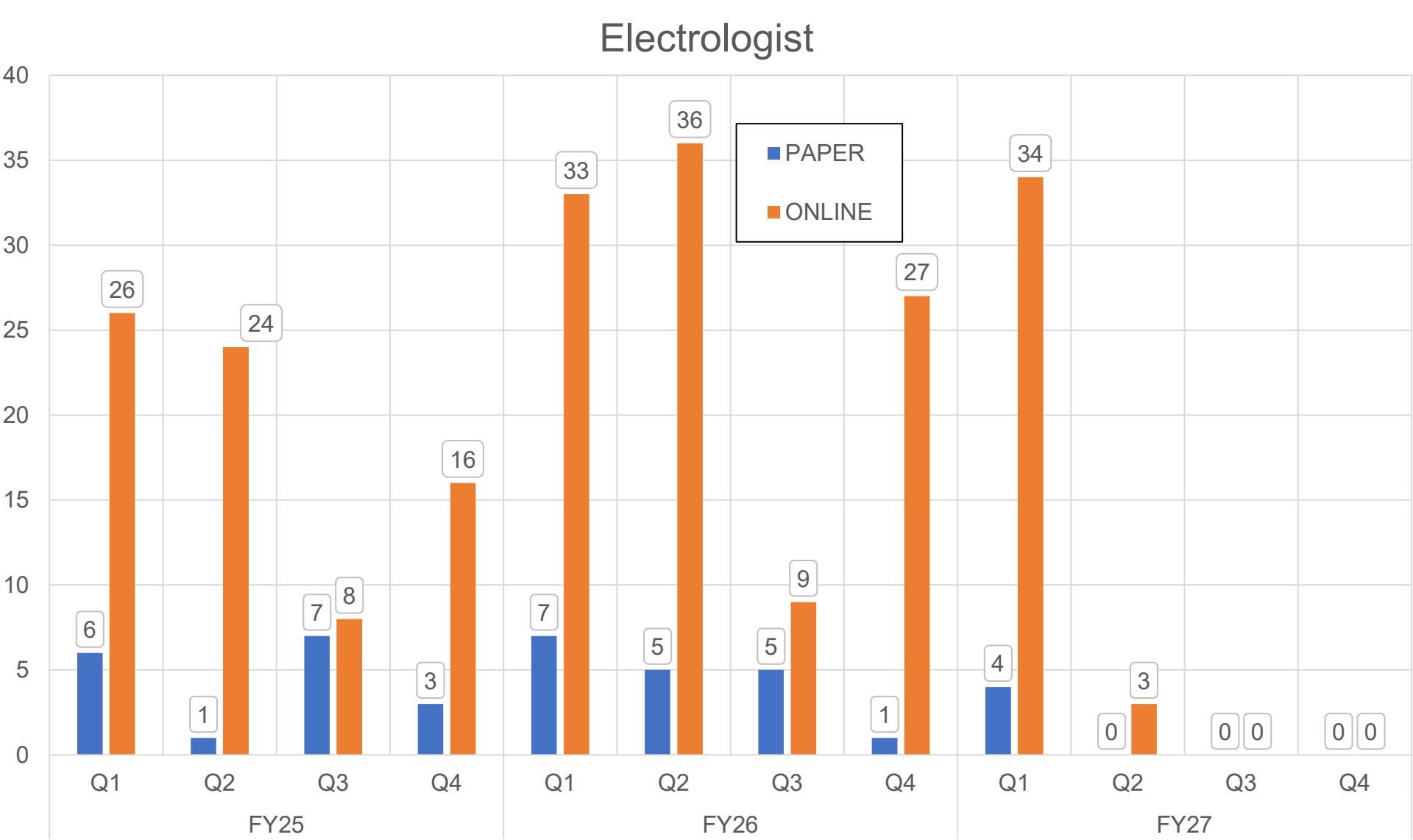


7/1/24 - 6/30/26	FY25	125
7/1/25 - 6/30/26	FY26	135
7/1/26 - 6/30/27	FY27	36
TOTAL		296

Earlobe Piercing Technician

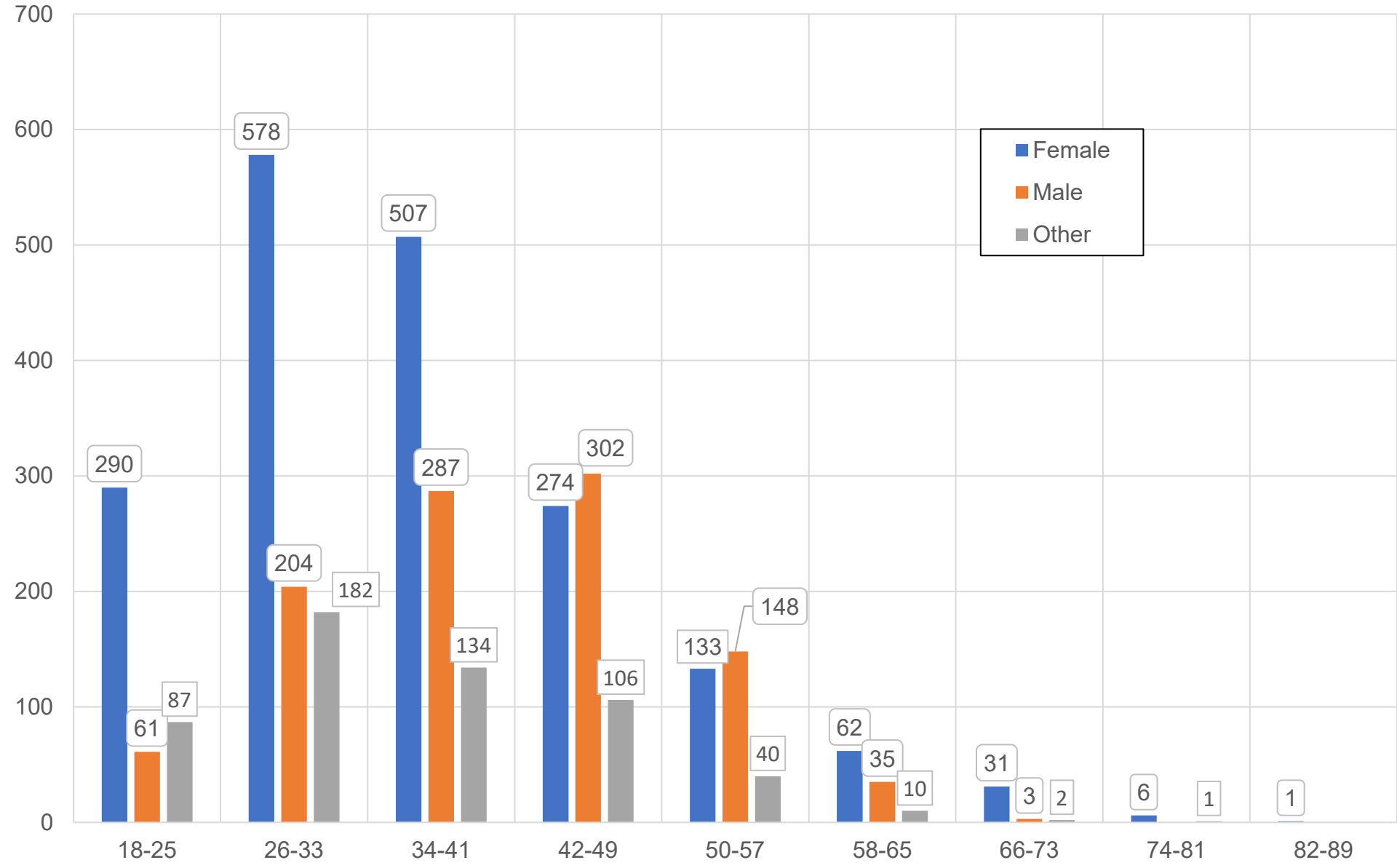


7/1/24 - 6/30/26	FY25	43
7/1/25 - 6/30/26	FY26	44
7/1/26 - 6/30/27	FY27	8
TOTAL		95



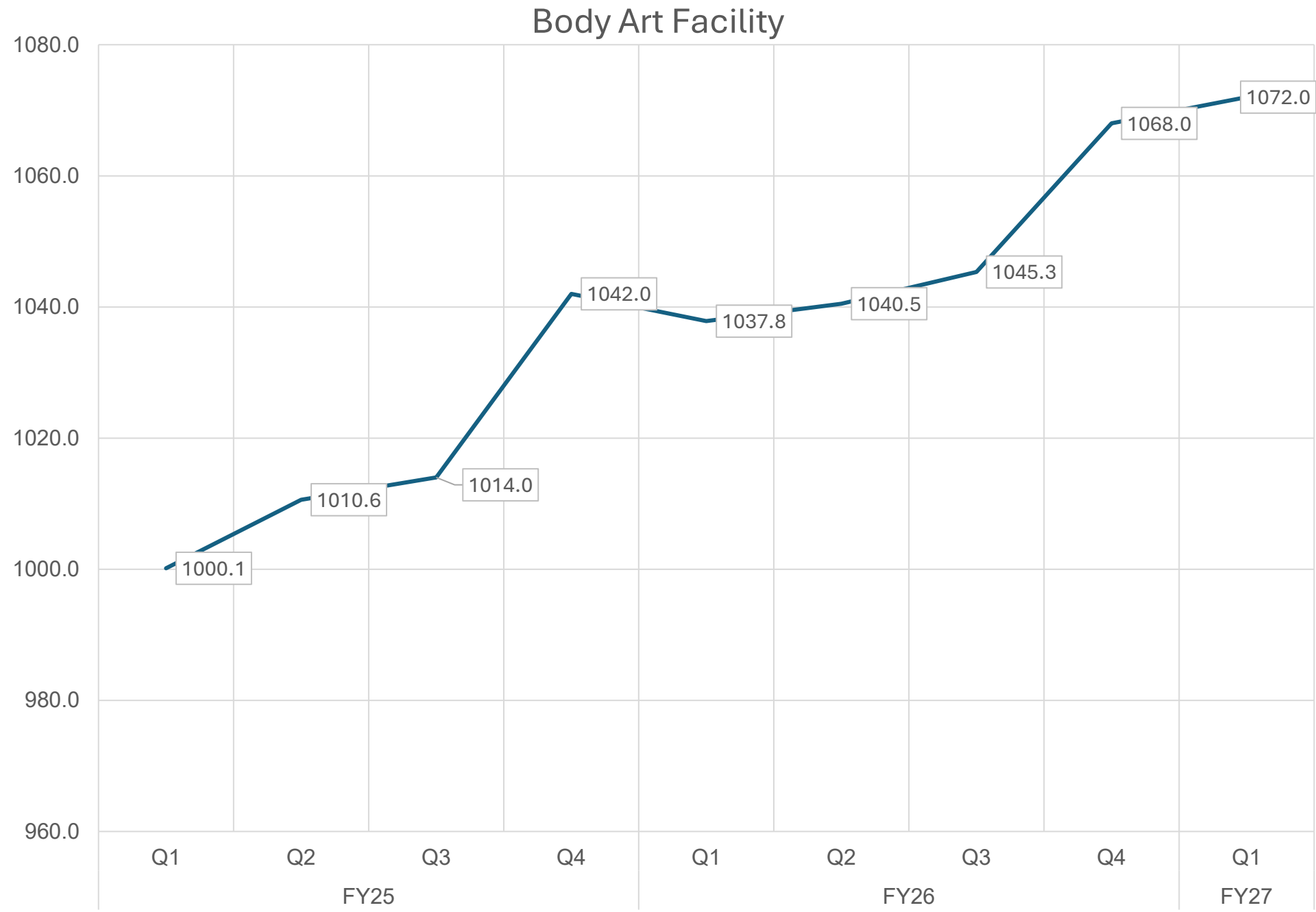
7/1/24 - 6/30/26	FY25	91
7/1/25 - 6/30/26	FY26	123
7/1/26 - 6/30/27	FY27	41
TOTAL		255

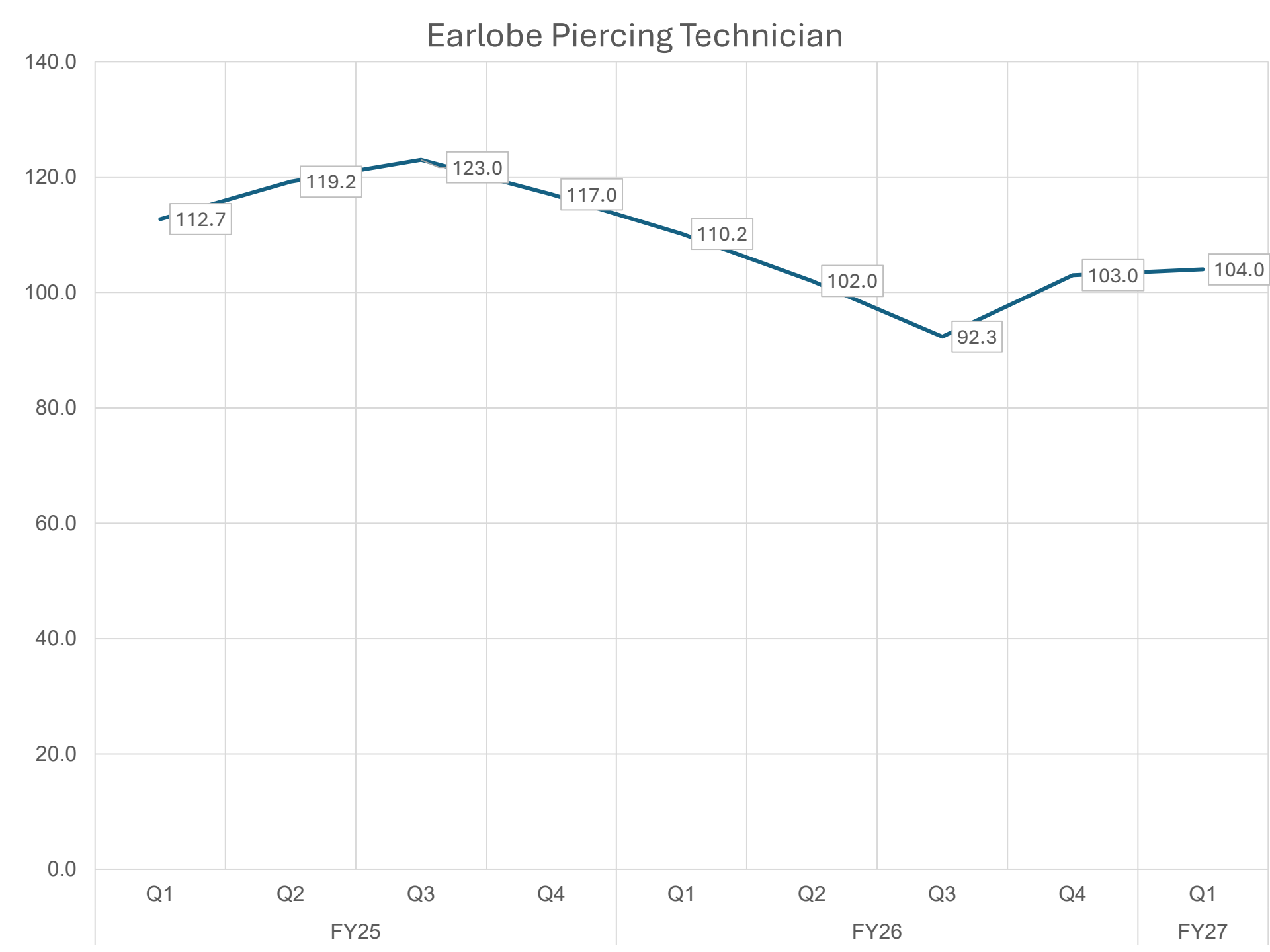
LICENSES BY AGE AND GENDER

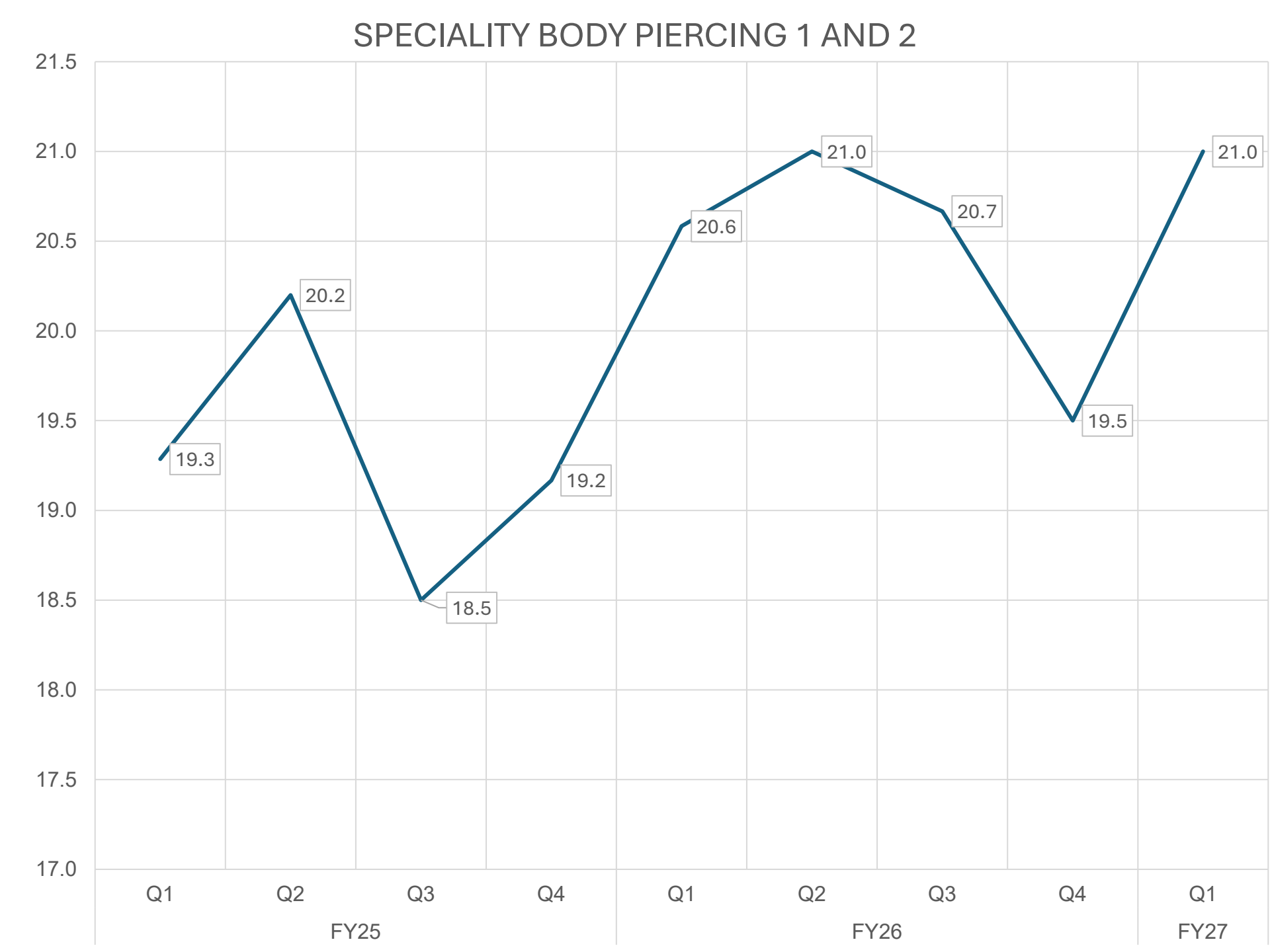


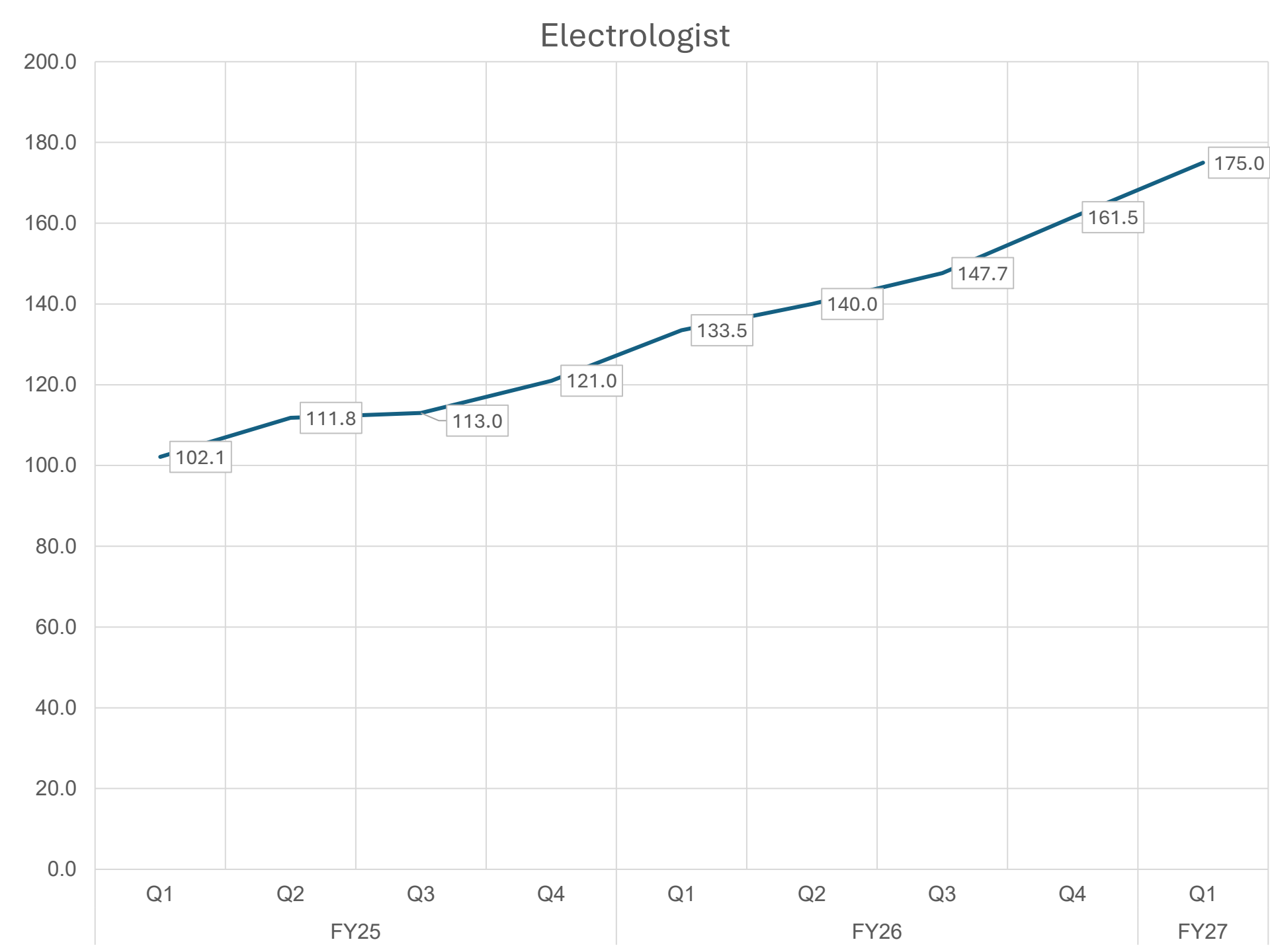
TOTAL	3358

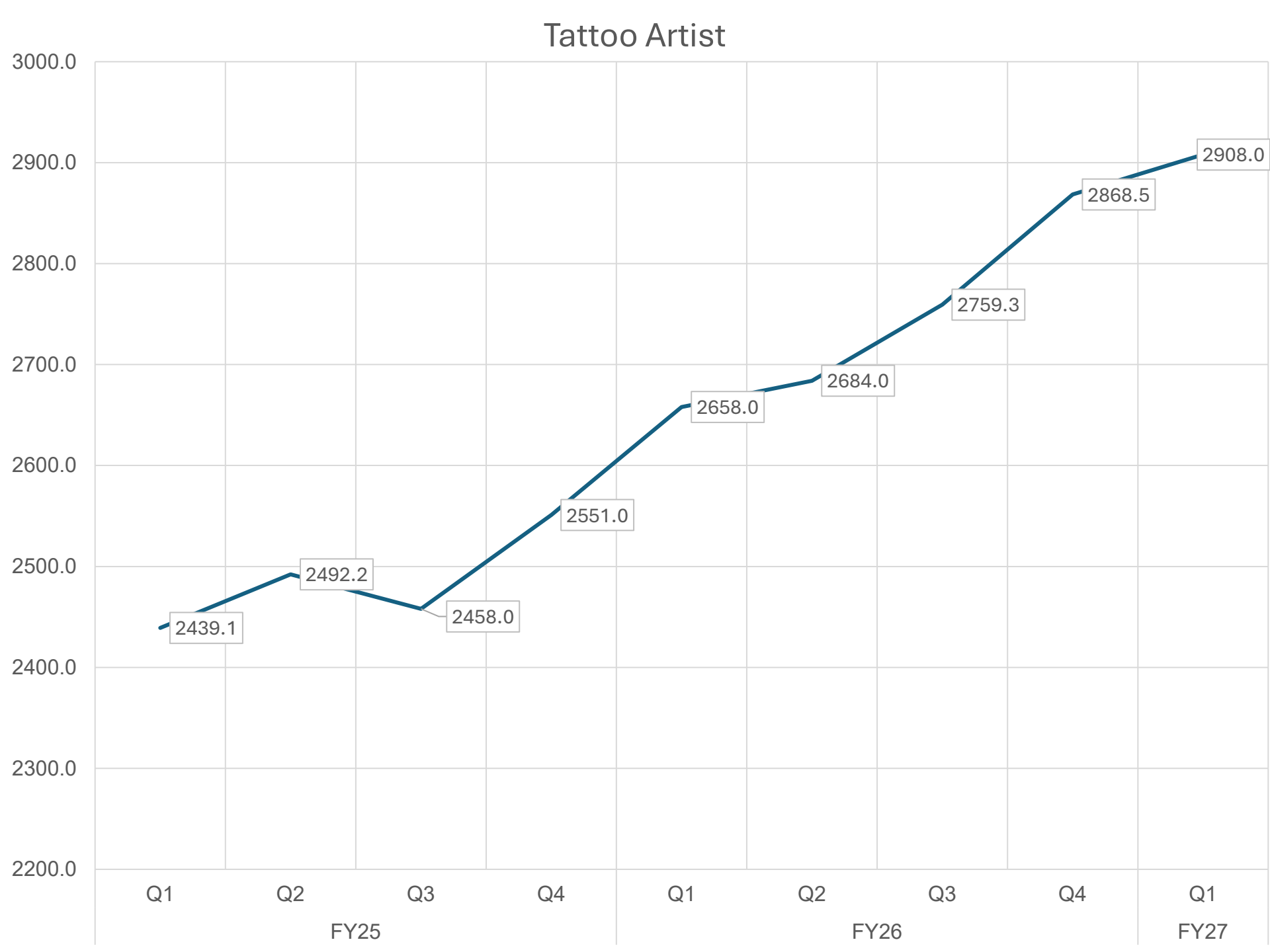
LICENSING TRENDS

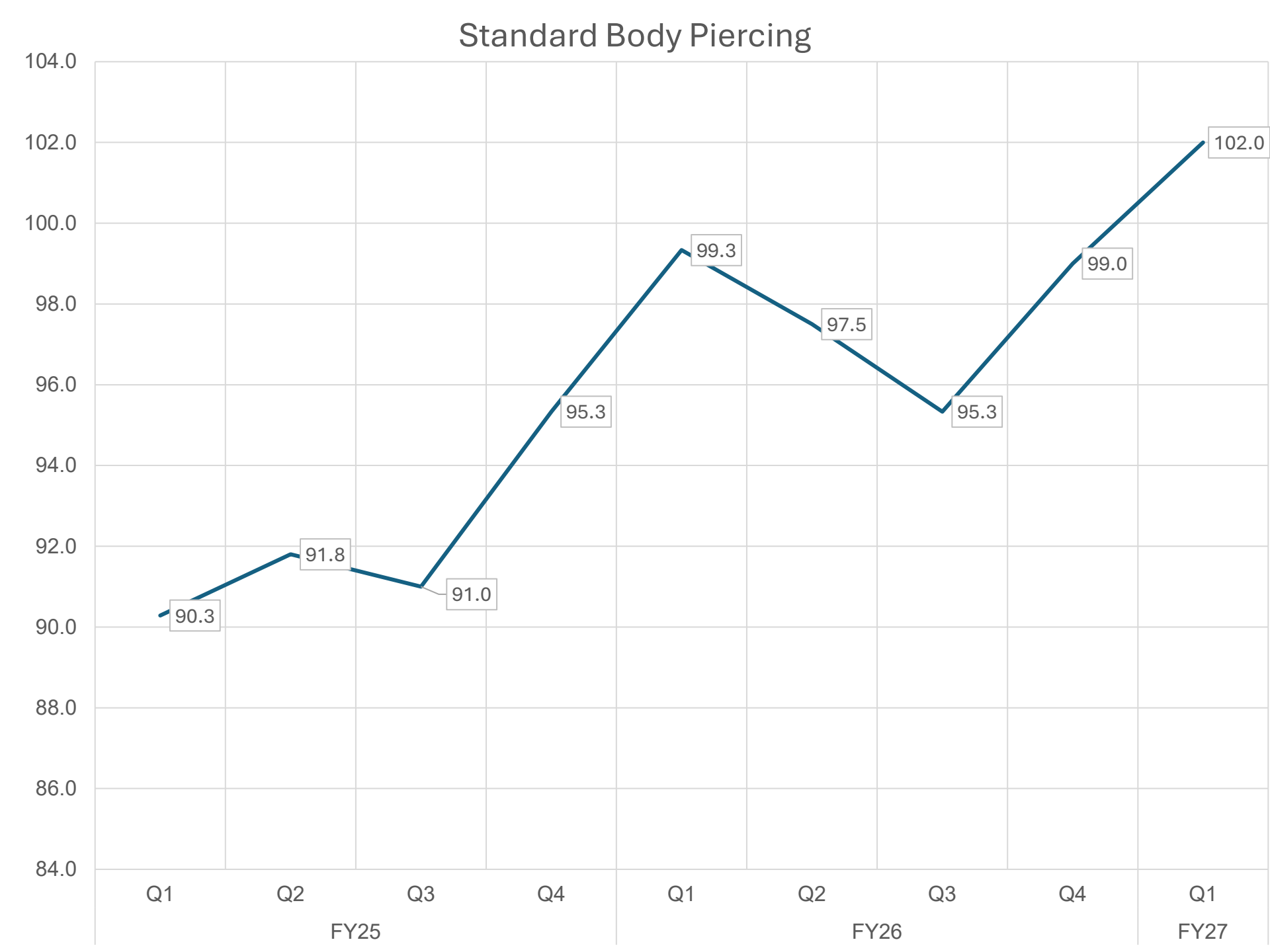



Earlobe Piercing Technician
140.0
120.0
100.0
80.0
60.0
40.0
20.0
0.0
112.7
119.2
123.0
117.0
110.2
102.0
92.3
103.0
104.0
Q1
Q2
Q3
Q4
Q1
Q2
Q3
Q4
Q1
FY25
FY26
FY27


SPECIALITY BODY PIERCING 1 AND 2
21.5
21.0
20.5
20.0
19.5
19.0
18.5
18.0
17.5
17.0
19.3
20.2
18.5
19.2
20.6
21.0
20.7
19.5
21.0
Q1
Q2
Q3
Q4
Q1
Q2
Q3
Q4
Q1
FY25
FY26
FY27


Electrologist
200.0
180.0
160.0
140.0
120.0
100.0
80.0
60.0
40.0
20.0
0.0
102.1
111.8
113.0
121.0
133.5
140.0
147.7
161.5
175.0
Q1
Q2
Q3
Q4
Q1
Q2
Q3
Q4
Q1
FY25
FY26
FY27


Tattoo Artist
3000.0
2900.0
2800.0
2700.0
2600.0
2500.0
2400.0
2300.0
2200.0
2439.1
2492.2
2458.0
2551.0
2658.0
2684.0
2759.3
2868.5
2908.0
Q1
Q2
Q3
Q4
Q1
Q2
Q3
Q4
Q1
FY25
FY26
FY27


Standard Body Piercing
104.0
102.0
100.0
98.0
96.0
94.0
92.0
90.0
88.0
86.0
84.0
90.3
91.8
91.0
95.3
99.3
97.5
95.3
99.0
102.0
Q1
Q2
Q3
Q4
Q1
Q2
Q3
Q4
Q1
FY25
FY26
FY27

Board of Electrologists and Body Art Practitioners

State Fiscal Year	2024 (Jul23-Jun24)	2025 (Jul24-Jun25)	2026 (Jul25-Jun26)	2027 (Jul26-Jun27)
Beginning Cash Balance	1,079,599	1,124,660	1,127,197	1,180,382
Revenues	483,466	552,709	644,026	36,074
Expenditures	438,405	550,172	590,842	92,960
Net Operations (Rev - Exp Only)	45,061	2,537	53,185	(56,885)
Ending Cash Balance	**1,124,660**	**1,127,197**	**1,180,382**	**1,123,497**

** As noted in header, to ensure consistency 'Current' data in all reports are based on data from the most recently closed month to the report date.*

*Revenues and Expenditures updated with Actuals: 9.14.2026

*Total carry forward of Revenue from FY 2026 to FY 2027 is: 1,180,382

Regulatory Report

REGULATORY REPORT

	2023	2025	2027	Grand Total
OPEN				
Body Art Facility	0	13	11	24
Earlobe Piercing Technician	0	0	1	1
Electrologist	0	1	4	5
Piercing - Specialty Level 1	0	0	5	5
Standard Body Piercing	0	4	10	14
Tattoo Artist	3	11	18	32
Temporary Tattoo Artist	0	3	0	3
Unassigned	0	1	1	2
Unlicensed - Body Art	3	16	26	45
TOTAL	**6**	**49**	**76**	**131**

	2023	2025	2027	Grand Total
CLOSED				
Body Art Facility	15	14	17	46
Standard Body Piercing	3	0	0	3
Tattoo Artist	10	4	7	21
TEMPORARY Body Art Facility	0	1	0	1
Unassigned	0	1	0	1
Unlicensed - Body Art	20	16	14	50
Temporary Electrologists	1	0	0	1
TOTAL	**49**	**36**	**38**	**123**

COMPLAINTS BY TYPE				
	2023	**2025**	**2027**	**Grand Total**
COVID COMPLAINT	1			1
Licensing Concern	40	52	53	145
Safety/Sanitation Issues	3	13	12	28
Services performed by a licensee on minors			1	1
Services performed by an unlicensed person on minors	1		3	4
Services Provided	10	18	19	47
Unassigned		2	2	4
Opened for failure to meet CE audit requirements			24	24
Grand Total	**55**	**85**	**114**	**254**

MEMORANDUM

To: Interested Parties

From: Trisha Moul, Qualification Specialist

Date: August 17, 2026

Subject: Board of Electrologists and Body Art Practitioners Continuing Education Audit

A continuing education audit on currently active Licensed Board of Electrologists and Body Art Practitioners was conducted and completed on June 16, 2026. The audit included approximately 3% of the license base for a total of 55 Licensees randomly sorted and selected through a computer-generated process.

On March 3, 2026, all 55 Licensees were sent an audit notification letter informing them that they needed to provide verification of having complied with the 8 hours of approved continuing education for electrologist or 10 hours of approved continuing education for tattoo artists, obtained within the audit attestation period. The deadline to comply with the audit was April 23, 2026. A second and final notice was sent via certified mail on May 7, 2026. The deadline to comply with the final notice was June 6, 2026.

Of the 55 Licensees audited, 40 submitted the required number of hours in approved continuing education to meet the audit requirements and 15 Licensees (1 electrologist, 14 tattoo artists) failed to meet the requirements of the audit. All 15 Licensees that failed to comply were referred to HLO's Regulatory Operations Division.

A copy of this report will be provided at the next Board of Electrologists and Body Art Practitioners meeting held on October 19, 2026.

Executive session

Pursuant to ORS 192.660(2)(f), ORS 192.355(9)(a) and ORS 40.225 for the purpose of considering information or records exempt from public inspection.

Policy Report

Administrative Petition for Regulatory Action Submitted by the Oregon Association of Licensed Electrologists (OALE)

Date: August 13, 2026

To: Anne Thompson, Policy Analyst & Rules Coordinator
Oregon Health Licensing Office (HLO)
Board of Electrologists and Body Art Practitioners
1430 Summer St. NE
Salem, OR 97301

Subject: Petition for Rulemaking Under ORS 183.390 — Reform of Electrology Chairside Training and Supervisor Standards

Dear Ms. Thompson and Members of the Board:

Pursuant to ORS 183.390, the Oregon Association of Licensed Electrologists (OALE), a long-standing affiliate of the American Electrology Association (AEA), respectfully petitions the Oregon Health Licensing Office and the Board of Electrologists and Body Art Practitioners to amend OAR 331-910-0024 and related provisions governing the Electrology Temporary Trainee pathway.

OALE submits this petition because Oregon's current trainee framework no longer provides adequate assurance of consistent and competent training necessary to protect public health and safety.

Background

The Temporary Trainee pathway was created to address a workforce shortage and the absence of an electrology school in Oregon. Those circumstances have materially changed. Oregon now has an operational electrology school, and the number of licensed electrologists has grown from approximately 80 to 145.

The current pathway permits licensure through chairside training under a single supervisor with limited professional experience, creating the potential for inconsistent training and uneven preparation for independent practice. Inadequate training may increase the risk of preventable adverse outcomes, including infection, scarring, pigment changes, and other permanent tissue injury.

Supervisor Standards

Electrology is a technical, invasive procedure requiring precise technique, clinical judgment, infection-control competence, and the ability to evaluate long-term tissue response. These competencies are not sufficiently developed within the first two years of practice to qualify an individual to train others.

Under the current rule, supervisor approval requires only active Oregon licensure, no current or pending disciplinary action, and an attestation of two years of active practice. That standard

does not meaningfully ensure that the supervisor is prepared to train another practitioner safely and competently.

This low standard also creates financial incentives for fee-based training arrangements that prioritize revenue over educational quality. OALE has received repeated inquiries from aspiring electrologists (before even completing their own training) seeking to become supervisors because they recognize that supervision itself may become a source of income.

There is also a substantial disparity between becoming an approved electrology school and becoming an approved training supervisor. Establishing an electrology school requires significant time, documentation, financial investment, and regulatory compliance. In contrast, under the current supervisor standard, a licensee may become an approved training supervisor without any additional investment or education beyond the requirements for obtaining an electrology license.

By comparison, the American Electrology Association (AEA) requires apprenticeship instructors to be Certified Professional Electrologists (CPEs) in good standing for at least five years, reflecting the experience expected to train practitioners in a profession where errors may result in permanent injury. Oregon's two-year supervisor requirement does not align with this standard and has made some Oregon-licensed electrologists' ineligible for AEA membership, reducing their access to continuing education, certification, and professional development opportunities.

While public protection remains the primary purpose of this petition, Oregon's licensure framework should support practitioner development and connection to the professional organizations that promote education, standards, and accountability.

Options for achieving the existing rule's substantive goals while reducing negative economic impact on businesses

It is difficult for OALE to assess the precise economic impact because of a transparency and equal-administration issue. HLO publicly lists licensed electrologists and licensed electrology trainees, but does not appear to publicly identify all approved electrology training supervisors.

The economic analysis should also consider the long-term costs of inadequately trained electrologists entering the marketplace, including preventable consumer injuries, loss of consumer confidence, and reputational harm to the profession. OALE believes these long-term risks outweigh the limited economic impact of strengthening supervisor qualifications.

OALE proposes a limited transition for existing HLO-approved supervisors only who do not yet meet the proposed five-year practice requirement: the five-year requirement would be temporarily suspended until the supervisor reaches five years of active practice, provided the supervisor obtains CPE certification within one year of the rule's effective date. This would allow existing supervisors to continue supervising while requiring them to take an immediate, substantive step toward meeting the higher professional standard. The transition would not apply to new supervisor applicants.

The Continued Need for the Existing Rule

OALE recognizes the continued need for a regulated, structured pathway through which individuals may obtain supervised electrology training. However, the circumstances that originally justified the current Temporary Trainee framework have materially changed and standards should be updated.

Complexity of the existing rule

The existing supervisor rule is relatively simple to administer but provides minimal qualification standards. The proposed amendment adds objective criteria that can be readily verified by the Office. OALE does not anticipate substantial additional administrative complexity. Rather, it would establish clearer and more objective standards for determining who is qualified to supervise trainees.

The proposed contractual provision would apply as a condition of supervisor approval rather than as a general regulation of private employment contracts.

Overlap, duplication, or conflict with other requirements

OALE is not proposing to duplicate or replace existing federal, state, or local regulation. The proposed supervisor qualifications concern eligibility to serve as an Office-approved electrology supervisor and are specific to the state's electrology training program. OALE is not aware of any local government regulation that duplicates or conflicts with the proposed requirements.

Changes in Technology, Economic Conditions, and Other Relevant Factors

Since the Temporary Trainee pathway was established, Oregon's electrology training environment has changed substantially. Oregon now has an operational electrology school, and the number of licensed electrologists has nearly doubled. These changes reduce the need to rely on minimally qualified individual supervisors as the primary means of expanding the profession and support a higher standard for individuals responsible for training future practitioners.

Evidence of Systemic Risk

The risks associated with chairside training supervised by providers with limited professional experience and employer-controlled training are not merely theoretical. Public labor proceedings and worker disclosures from the Pacific Northwest have highlighted concerns regarding Training Repayment Agreement Provisions (TRAPs) and workplace conditions. Real You Electrolysis, a business operating in Vancouver, Washington, is currently the subject of federal labor proceedings before the National Labor Relations Board (Case 19-RC-387648). OALE cites these proceedings not as findings of wrongdoing or as matters for the Board to adjudicate, rather as demonstration of Oregon’s supervisor qualification standards having practical consequences beyond the state’s borders.

At least one electrologist associated with Real You's in-house training program appears on the Oregon Health Licensing Office's Approved Electrology Supervisor List despite having held an Oregon electrology license for less than two years. OALE has also received reports of similar

concerns within Oregon, including debt-based training agreements, inadequate supervision, and trainees entering independent practice without sufficient competency.

These concerns support strengthening supervisor qualifications and establishing safeguards against coercive training agreements.

Requested Action and Basis for Amendment

Pursuant to ORS 183.390 and OAR 137-001-0070, OALE respectfully requests that the Board amend OAR 331-910-0024 to strengthen supervisor qualification standards and establish conditions of supervisor approval that promote consistent, competent, and safe training of future electrologists.

The proposed amendment to OAR 331-910-0024 is attached as Exhibit A and is submitted in the format required by OAR 137-001-0070, with existing rule language reproduced in full, proposed deletions shown by strikeout, and proposed additions shown in bold type.

Conclusion

The Temporary Trainee pathway was created to address a temporary workforce need that has substantially diminished, while the regulatory framework has not kept pace. Strengthening supervisor qualifications is a reasonable and necessary step to improve training consistency, protect consumers, and support the Board's public-protection mission.

Pursuant to ORS 183.390 and OAR 137-001-0070, OALE respectfully requests that this petition be accepted for consideration, that the Board grant the requested rule amendment to OAR 331-910-0024, or such amendment as the Board determines appropriate, and that the Health Licensing Office provide its written response within the timeframe prescribed by law.

Respectfully submitted,

Oregon Association of Licensed Electrologists (OALE)
Address: 8196 SW Hall Blvd, Beaverton, OR 97008
https://www.electrolysis-oregon.org/

The undersigned members of the OALE Board of Directors have reviewed and approved this petition and join in its submission:

Brenda Cox, Licensed Electrologist - President
Kathy Trosen, Licensed Electrologist - Vice President
Sheila Ahern, Certified Professional Electrologist & Licensed Electrologist - Good & Welfare, Historian, Legislative Watch
Denissa Tiller, Licensed Electrologist - Treasurer, Membership
Joan Gilbert, Licensed Electrologist - Secretary
Piney Kahn, Licensed Electrologist - Webmaster
Lana Blue Zeitler, Licensed Electrologist - AV Chair

Contact for Correspondence

OALE respectfully requests that all correspondence regarding this petition, including acknowledgment of receipt, requests for additional information, status updates, and the Board's response, be directed to:

Piney Kahn
Email: electrolysisoregon@gmail.com
Phone: (503) 849-2127
https://www.electrolysis-oregon.org/

EXHIBIT A

Proposed Amendment to 331-910-0024
Requirements for Electrology Supervisor

Existing rule language with proposed amendments indicated:

An individual holding an electrology license under ORS 331-910-0025 may apply to become a supervisor for purposes of the Electrology Training Program.

(1) To obtain Office approval as a supervisor for a trainee, an individual must:

(a) Submit a completed form prescribed by the Office, which must contain the information listed in OAR 331-030-0000;

(b) Hold an active Oregon electrology license with no current or pending disciplinary action; and

~~(c) Attest to having been actively practicing electrology for at least two years before the date of application.~~

(c) Demonstrate having actively practiced as a licensed electrologist for not fewer than five years and having held a Certified Professional Electrologist (CPE) certification in good standing for not fewer than five years, including a minimum of two consecutive years holding an active Oregon electrology license immediately before the date of application.

(d) As a condition of supervisor approval, an approved electrology supervisor may not require a trainee, whether participating through employment or otherwise, to enter into a training agreement or employment agreement containing unreasonable repayment obligations, liquidated damages provisions, non-compete clauses, or other coercive contractual terms that substantially interfere with the trainee's ability to complete an approved Electrology Training Program or lawfully practice electrology following Licensure.

(2) A licensee may not provide direct or indirect supervision to a trainee until the Office has issued notification that the licensee is approved to be a supervisor.

ISSUE STATEMENT

DATE: Sept. 11, 2026

ISSUE:

The Board of Electrology and Body Art Practitioners received a petition for rulemaking on Aug. 13, 2026. As part of the process, public comment must be sought on the existing rule.

PUBLIC COMMENT

Hello,

I received the email inviting public comment on OAR 331-910-0024. The email includes the rule as written, but it does not say anything about what amendments the petition is requesting. I wondered if I could learn what changes are requested so I could better comment on those?

My only comments on the rule as it is are thus:

- Since a licensee may not begin providing supervision until they have received notification that they are approved, it would be great if they could apply somewhat in advance of their two year anniversary (and of course their approval becoming effective no earlier than that two year anniversary date)
- I think it would be reasonable that someone applying to be a supervisor should also need to submit some form of curriculum plan
- Once a supervisor is approved, it would be tremendously helpful if they could have access to clear information about what will and will not be on the written exam so that they can assign appropriate readings and materials.
    - As a side note, from my memory of the electrology written exam, many of the questions are not terribly relevant for modern electrology practitioners (things like the definition of a rheostat, which is not present on modern electrolysis machines) and many topics which are relevant are excluded or under-represented, such as contraindications

Best,

-Shay Witten, LE, CPE; *they/them*

Electrologist, Practice Owner

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To whom it may concern,

The thought of the apprenticeship pathway ending in Oregon is concerning as many are not able to afford the upfront costs of schooling. When I first started looking into the profession I was actively trying to find someone to teach me for a year before I ended up deciding to go to school in California. For me, the decision to move out of state, pay for rent and other living costs in California while going to school there was cheaper than if I had stayed and gone to school in Oregon. That decision was a privilege many cannot not afford to have. Leases, caring for family members, and needing to keep employment while going to school make that option nearly impossible for most new electrologists. Although I ended up deciding an apprenticeship wasn't for me, it is the only affordable option for some. Why provide more barriers for a growing field that provides critical work for those experiencing gender dysphoria and properly preparing individuals to have successful surgery outcomes? I believe it is important to provide inclusive routes to becoming licensed, and by taking away apprenticeship as an option, we are creating unnecessary barriers to entry that will disproportionately affect low income individuals.

Thank you for taking the time to read this,
Lizzy Thompson

****

I am an electrologist with 20 years of experience and have trained one electrologist chairside. I believe this mentorship model is a valuable way to pass our profession on to the next generation. I do not think it should be required for trainers to hold the CPE credential, as this would duplicate existing Oregon standards and add financial burdens that devalue decades of practical experience. Experience is essential, and requiring more than two years of experience for trainers makes sense. Chairside training can be especially valuable in small communities, where practitioners may retire and successors already live locally. For those with families or children, relocating for school may be unrealistic. Expanding training opportunities can help ensure access to services, particularly for transgender clients who may not have the means to travel to larger cities. I'm glad to see Oregon now has an electrolysis school, and I believe chairside training can complement that to meet community needs and support continued service across the state.

Tami Kanning

541-514-4857

****

Dear Ms. Thompson and Members of the Board,

I am an Oregon-licensed electrologist, and I am writing to express my opposition to the proposed requirement that chairside training supervisors have at least five years of active practice and five years of CPE certification in good standing.

I want to be clear that I support strong educational standards, competent supervision, and regulations that protect the public. However, I do not believe the proposed requirements are the best way to accomplish those goals.

One of my greatest concerns is access to this profession.

The fact that Oregon now has an operational electrology school should not be used as justification for making chairside training substantially less accessible. The school pathway costs approximately $16,000. That is simply not financially realistic for many people who could otherwise become skilled and competent electrologists through supervised training.

Chairside training provides an important alternative pathway into this profession for people who may not have the financial resources to attend a private school. Making that pathway unnecessarily difficult risks turning electrology into a profession accessible primarily to people who can afford a significant upfront educational expense.

I am particularly concerned about what that means for LGBTQ+ people.

A substantial portion of the population we serve is transgender and gender diverse. Gender-affirming electrolysis can be an incredibly important part of someone's medical care and transition. I believe the people receiving these services should also have meaningful opportunities to enter this profession, build businesses, become educators, and eventually train the next generation of electrologists.

Creating additional financial and professional barriers to entry risks making the profession less representative of the communities we serve.

I also question whether five years of practice is an appropriate measurement of someone's ability to supervise.

Time in a profession does not automatically equal competency. **An electrologist who has practiced for five, ten, or twenty years can still have poor technique, outdated practices, or unsafe habits—and those habits can just as easily be passed on to a student.**

Conversely, someone with fewer years in practice may be highly skilled, current on infection-control standards, knowledgeable about different modalities and skin types, and fully capable of providing excellent instruction.

If the concern is whether supervisors are competent enough to train students safely, then I believe Oregon should evaluate competency rather than simply counting years.

I have similar concerns about requiring five years of CPE certification. If Oregon believes supervisors need additional education beyond their electrology license, then the state should clearly identify what specific competency is missing and establish a requirement directly related to that competency. **Requiring a separate professional certification simply for the sake of having another credential**

creates another barrier without necessarily demonstrating that someone is a better practitioner or educator.

I would support thoughtful changes to the chairside program. For example, Oregon could establish supervisor competency requirements, require specific continuing education related to teaching and infection control, strengthen oversight of chairside programs, establish minimum standards for what students must be taught, or require supervisors to demonstrate competency before being approved.

Those approaches would address the actual issue: whether someone is qualified to teach.

I do not believe eliminating or severely restricting chairside training simply because Oregon now has a school is the answer. Nor do I believe that years in practice or possession of an additional certification, by themselves, demonstrate someone's ability to educate another electrologist.

We can raise educational standards without closing doors.

I encourage the Board to preserve an accessible chairside pathway while developing standards that evaluate actual competency, safety, and teaching ability. Our profession will be stronger when becoming an electrologist is both rigorous and attainable—and when the people providing these services better reflect the communities who depend on them.

Thank you for considering my perspective as an Oregon-licensed electrologist.

Sincerely,

Braylin
Licensed Electrologist

****

Having excessive requirements for any profession, skill, job is like China's one child policy.

Oregon has a lack of electrologists and we need more. The number is diminishing each year. Electrology works and has been working for over 150 years without any health consequences to clients.

Electrology is a local skill, a contribution to community well- being.

One third of the states in this country do not have any requirements to be an electrologist.

Doing Electrolysis is about as complicated as whipping egg whites. Dr Hinkle's book uses many examples and photos of Electrolysis in egg to show coagulation.

Linda Easter

****

Linda Easter ldjeaster@gmail.com

Hello,

I am not sure why we need electrologist to supervise anyone.

If trainee goes to school and gets licensed why the chair side training?

The trainee is responsible for being a good electrologist. There are too many electrologist in practice who learned wrong. Only do thermolysis for instance. Don't take time with each hair. I would not want to be locked into learning one person's way.

One third of the states in this country, WA, AL, AK, AZ, CO, GA, KY, MN, MS, MO, NY, PA, SC, SD, TX, VA, WA, WV, WY.

DO NOT HAVE ANY LICENING REQUIREMENTS to be an Electrologist. Yet they have qualified CPE's and totally unlicensed practitioners making same hourly rate as we do. The client decides who to use.

People in Oregon need jobs, they need to start practicing. It's something a homemaker/mother could do in an extra room for income, or a young person smart enough not to attend college and wanting a career. Maybe even market an electrology machine they manufactured.

Like other vocational arts: welding, yardwork, building, cleaning, photography, cooking one gets proficient by practice and study. Understanding the science behind this 150 year old art is immensely beneficial. The wonderful Hinkle textbook is out of print now which taught electrology is an art that is based on science.

Why would an Electrologist want to supervise someone? Is it just to be able make money off a new practitioner? Does not sound like a good financial situation for either person.

Work time is rewarding for the electrologist, as it's an art. And having free time, family time, downtime to rest eyes is also necessary and rewarding.

Linda

****

Linda Easter ldjeaster@gmail.com

I have two relatives who are presently at Burning Man.

They are Oregonians.

I cringe as I hear rate increases or other stipulations being out upon them and their vocations.

Linda Easter.

****

To the Oregon Health Licensing office.

This is regarding the rule of

331-910-0024.

Section C have actively practiced for 2 years.

As a licensed Electrologist for over 30 years. I think it is very unwise to have a person that has only been practicing for two years to be qualified as a training supervisor.

I would like to see a training supervisor have at least 5 years of continuous practice (in the state of Oregon).

By then they have seen a variety of clients, different areas on the body, and skin types.

They have developed the skills and knowledge to train someone. I would also like them to have 25 hours of continuous education hours per year

Thank you for considering my views on this issue.

Sincerely,

Teresa Eason L.E.

****

Hi,
My name is Brenna
and I am a licensed Electrologist and licensed trainer in Oregon. I wanted to make a comment in regards to the petition to change the rules for supervisors. I don't think that we need to make such a huge change to the trainer expectations. I'm not sure why
we would need to have so many more years of being licensed than other state license holders (such as piercers and tattoo artists). As someone who started supervising people after two years I have felt pretty confident in my abilities to train in a safe, responsible,
and informed way. We are also required to do continuing education every year in order to be able to keep our state license which we need to be able to train. Because of that we are continuing to learn and grow past those two years. I also don't think that
we should be required to be CPE certified. This would create a hardship both time and money wise for those who would like to be trainers.
Thank You For Your
Time,
Brenna Hart

****

Hello,

My name is Shay Witten. I am an Oregon Licensed Electrologist and a Certified Professional Electrologist (CPE) who was trained and licensed in 2024 through the Chairside Pathway. I am writing in response to OALE's petitioned changes to Oregon's Electrology Chairside Training and Supervisor Standards.

In the interest of full disclosure, I am hoping to apply to become a supervisor once I reach two years of active practice, and have been actively working hard on improving my skills and knowledge and developing a curriculum plan to that end; so I have personal stake in this issue. I am choosing to seek approval as a supervisor because the school is financially inaccessible to some people who I believe have the potential to be excellent electrologists, and offering them apprenticeship allows us to find creative ways to make training possible for them. Additionally, having been trained Chairside myself, I really valued the additional individualized attention that was possible due to the smaller cohort size as well as the lasting professional relationships I developed with my cohort and my instructor.

While there are parts of OALE's petition that I agree with - such as that a high, consistent standard should be upheld in the approval of supervisors to train new electrologists - **I disagree with their specific recommendations and in fact fear that those recommendations would both fail to solve the problems they seek to and also cause new ones.**

OALE's petition proposes to increase the minimum requirements for training supervisors to at least five years of active practice and five years of CPE certification in good standing. I have the following concerns:

1. This proposal hinges on the assumption that years of experience - and only years of experience - predicts the quality of practice and training a prospective electrology supervisor can provide. In practice, with only 8 continuing education hours required per year and no regular re-testing or consistent required skills refreshers, a working electrologist can easily stagnate after their first year in practice and simply spend years solidifying bad habits. A CPE certification (or CCE or CME certification) requires more annual continuing education, and does show a commitment to advancing education, but similarly adding years of required experience fails to actually address the issue. Anecdotally, when clients come to me nervous about electrolysis because of bad past experiences and have shared the name of the electrologist in question, it has almost exclusively been with electrologists who had years and years of experience.
2. There are already a very limited number of places in the state to learn electrolysis. Lack of access and options - whether because of geography, capacity, budget, or other reasons - pushes people to go out of state for training, which further reduces consistency in standards of training for the state of Oregon. Further limiting the number of people who can apply to become supervisors will worsen this issue
3. The proposed requirement that supervisors have their CPE certification for five years would also exclude the instructors currently teaching at Oregon's only school, as neither of them has a CPE certification. I believe OALE's petition aims just to adjust requirements for Chairside practitioners, but it seems illogical to me to arbitrarily only change requirements for Chairside practitioners rather than apply changes across the board.
4. We have only just started crawling our way out of the care gap created by the combination of years with no in-state licensure pathway and the increased demand for electrolysis in the state, and rules like this would put us at increased risk of falling back into that care gap

Instead of simply requiring more and more years of experience, which I do not believe would accomplish the stated goal of the OALE's petition, I would propose that:

- Electrology supervisors be required to submit not just an application but a full curriculum plan in order to be approved.
- I do think it is reasonable to require electrology supervisors to have an advanced certification such as CPE (Certified Professional Electrologist), CCE (Certified Clinical Electrologist), CME (Certified Medical Electrologist), or an exam made by the state of Oregon specifically for this purpose. **I do not think that the CPE should be the only allowable certification for this purpose** because that puts a lot of power in the hands of a non-state organization (the AEA, which notably the OALE is a branch of)
- I think would be an easy and reasonable requirement that electrology supervisors should not be permitted to proctor their own students' practical examinations so long as there are other approved and actively practicing proctors in the area
- Electrology supervisors should have to meet a higher number of continuing education units annually in order to keep their supervisor status
- These requirements should be applied evenly across supervisors in all pathways, including both schools and Chairside.

Finally, I have the following notes to state:

- Right now there are still only a handful of approved supervisors in the state of Oregon, and very few of them are actively taking students. We are not experiencing a huge, uncontrolled boom of unqualified supervisors. Furthermore, students still need to pass both a practical and a written examination before they can become licensed, regardless of whether they learned through a school or Chairside. This is all to say, there is no reason to rush to create more barriers without cause and careful consideration. We can raise the bar across the board without creating unnecessary barriers
- The licensing board set two years as the minimum experience level for electrology supervisors when the Chairside pathway was first created for a reason, and there is currently no evidence to suggest that they were wrong to set the benchmark there.
- I am deeply concerned with any proposed rule change that would further centralize training in or give one place, such as the one school in the state, a de-facto monopoly. I don't think that is good for students, the public, or electrology as a whole.

Thank you for taking the time to read this comment and for your commitment to preserving access to safe, quality electrolysis services in the state of Oregon.

Best,

-

Shay Witten, LE, CPE; *they/them*

Electrologist, Practice Owner

****

I'm in favor of minimum five years experience being a licensed Electrologist , I don't see the need for them to be CPE this is just away for national AEA to get more money. This does not make you a better Electrologist, even at the school they are LE's.

The school here in Portland is definitely a joke! I've had several people go through the school only to have had no guidance on using and applying the basic skills and knowing the proper way to hold your hands to what kind of Magnification to use... I have given my time to many who have graduated and passed the boards with very little knowledge... those of who can... should give back to make the profession better and to keep our standards high. I'm sure I'm not he the only one to helping new students 👍
Thank you for your consideration in this very important matter.

Tangee Holub, LE
Eastside Electrology and
Eastside Electrology of Portland

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To Anne Thompson and the Board of Electrologists:

I am submitting this comment in support of the petition to amend OAR 331-910-0024. The current chairside training framework has created dangerous financial incentives in our state. Because anyone with a two-year license can become an approved supervisor without extra fees, testing, or curriculum oversight, private shops are using trainees as a cash grab.

We are seeing the consequences of this across the region, including predatory Training Repayment Agreement Provisions (TRAPs) and debt-trap contracts like those surfaced in federal labor proceedings with Real You Electrolysis in Vancouver. Unvetted supervisors are taking money from desperate students, offering low-quality instruction, and locking them into coercive contracts.

This hurts students, saturates the market with under-trained operators, and puts clients at risk of permanent skin damage. There is zero justification for keeping the supervisor bar so low. I strongly support OALE's call for five years of active practice, CPE certification or other advance training, and strict protections against coercive contracts.

Long term, Oregon should dismantle the chairside model entirely and leave professional education to state-licensed institutions.

Maia Pace

Chief Operations Officer, Licensed Electrologist, Instructor

Center for Electrology

Maia@centerforelectrology.com

www.centerforelectrology.com

****

Hello. I do not believe the rules proposed requiring electrology supervisors to be CPE Certified is a fare or reasonable expectation. The professional association (AEA) should not have overarching authority over the credentialing of Oregon's Electrolysis licensing. This requirement would not ensure any higher standard of expertise in practice, as the testing standards (practical and written exam) expected of the trainees would still, ultimately remain the benchmark of their demonstrable skills.

Moreover, I do not believe there is a financial incentive to apprenticing a trainee, when the hours expected to supervise one student would not exceed the median cost of performing electrolysis as a practitioner:

If a student has to be surpervised directly, the supervisor would easily make $100 per hour to work on a client directly, where their student could only manage a touition less than or equal to $15,000 for 600 hours($25 per hour) of training to be competitive with the electrology school in Portland.

I recently trained a new electrologist over 8 months by volunteering long hours, and I did it for free. It was the only way the chairside training format made financial sense to me, as a gift to the future of the industry, not as a source of indentured labor.

Using the bad reputation of Real You and their ham-fisted attempt to coerce indentured labor as a reason to further choke out the access of training for potential providers is inconsistent with the original goals of this apprenticeship pathway. As yet, we have not seen poor results from the new trainees.

If the AEA wishes to unify the standards of professionalism in electrology, they could lobby for licensing in Washington State, to keep bad actors from defrauding vulnerable people just over state lines.

-Bethesda Spencer-Canton, LE

Portland Oregon

****

Anne

You may not be able to accept my comments. I didn't remember that they needed to be in by this morning and here I am writing this in the evening believing they could be in by 9 pm instead on 9 am. I still hope you will consider them for the EBAP Board to review.

I believe the change in wording regarding the qualifications for Electrolysis Trainee Supervisors submitted by OALE is good and should be accepted to replace the current wording.

I was on the Rule Committee when we needed to adopt an option for Licensure when there was no Electrolysis school in Oregon. This qualifications segment was the most debated of all the regulations written. It was a heated debate. There were many people on the committee. Many were not Electrologists but represented many groups outside the profession. There were differences of opinions among the Electrologists too. One member of the group planned to soon become a Supervisor having been licensed 3-4 yrs, another the owner/instructor at the former school, another had taken the instructor exam when we had one years ago.

We all seemed to agree that an instructor needs experience, but there was this eminent need to get something going to make a new Pathway. I'm not sure how the votes were cast by those outside the profession, but even we were divided.

The deciding factor seemed to be that a Staff member quoted other professions that had the 2 year experience before becoming licensed as a supervisor. It seemed that was really what the State wanted--fast tracking like other groups had done and having identical requirements. We had been through that when we became a Board with tattooing and piercing and having to fight for our differences. In the long run the trend toward uniformity won out and the final vote was for 2 years.

Now we are seeing the pitfalls for having forgotten that perfection takes experience. A new Electrologist doesn't even see their results for nearly 2 years because of the hair growth cycles. To really instruct, a supervisor needs a variety of of situations and solutions to tell their students about, and have read more detail than the course time allowed. The 5 years is a better benchmark for qualifications.

The CPE test alluded to in the petition is a test that requires much academic reading to pass and much continuing education to renew. It is meant to improve any Electrologist and is especially helpful for an Instructor/Supervisor. Though it is not a hands on exam, it is challenging.

I would like the rule to change as the petition is written or in some format that requires more years of experience to become a Supervisor. We were looking for an equivalent pathway in content when the school was closed. It should be taught by someone with more experience than someone just getting the hang of it.

Sheila Ahern LE CPE

Electrolysis Clinic of Portland

48 yrs an Electrologist

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As the owner of Oregon’s state-licensed electrology school, a practitioner with over ten years in the clinic, and someone whose family has been in this field for over four decades, I am writing to support OALE’s petition and ask the Board to reform OAR 331-910-0024.

Running an official school through HECC requires real accountability. We pay state school licensing fees, pay into student protection funds, carry specific insurance, follow strict student protection laws, and absorb high business taxes and overhead. We also submit our full curriculum, handbook, catalog and student records every year, to be approved. All of this is in place for good reason: to protect trainees, safeguard clients, and keep professional standards high. The cost of our program reflects the costs associated with running a licensed school. None of that even touches on the cost of equipment, supplies, maintenance etc.

Right now, an individual shop owner faces none of these checks. They pay no extra state fees, are not required to carry extra insurance, follow no audited curriculum, and face zero state checks on how or what they teach. This lack of oversight leaves trainees completely unprotected and open to predatory financial contracts, amongst other issues. We have already seen this type of disaster unfold in Vancouver with Real You Electrolysis, a situation that directly involved an Oregon-approved supervisor who appeared on HLO's approved list despite only being licensed since **November 2024**, failing to meet even the basic two-year mark. When the state fails to catch a basic two-year licensing requirement on its own public records, it proves this entire supervisory pathway has zero real oversight. The Health Licensing Office clearly lacks the staffing, time, and oversight capacity to actively audit private shop supervisors. Adding more administrative layers to a setup that already struggles to enforce its baseline rules creates an unmanageable burden on state resources.

With forty years of family history in electrology, I can tell you that two years of solo practice is nowhere near enough time to safely teach essential skills like managing complex skin reactions, evaluating medical case studies, mastering different machinery, and perfecting needle techniques. And we, as teachers, are always learning anything new that comes along, so we can be prepared to share it.

When anyone can open a mini school in their shop with zero structure or oversight, it cheapens and endangers our entire field. It lowers skill levels across the board, it puts vulnerable students in debt traps, and leaves clients exposed to unskilled treatments, and possible permanent damage. Not to mention how quickly the market will get oversaturated. We are still in need of electrologists all over our state, but this situation could very quickly create too many in a single area, driving down rates, and reputations if poor work is being trained. Framing chairside training as an 'accessible option for low-income students' is a dangerous narrative. Lowering educational standards doesn't

empower students; it potentially traps them in predatory debt while flooding the market with under-trained operators.

Oregon has a school up and running now; I have put in a lot of time, work, research

and money to make it happen. The reason for permitting chairside training no longer exists. Please accept OALE's petition, raise supervisor requirements to five years if nothing else and start moving toward ending apprenticeships altogether. At the very least there should be a training program implemented to ensure that potential trainers are up to par. There has to be some sort of standard to meet for the safety of students and clients.

Danielle Lee

Director, Licensed Electrologist

Center for Electrology

dani@centerforelectrology.com

www.centerforelectrology.com

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Good afternoon,

I'm writing in response to the request for public comments on the petition to change Oregon's electrology chairside training program and supervisor standards. I do NOT believe this proposed change to the chairside training timeline serves the best interests of Oregon's electrologist community or our clientele.

- Electrology has survived in Oregon because of our chairside training option, as our state lacked an electrology school for so many years. The Center for Electrology has not been in business long enough to demonstrate its long-term viability for major state-level changes such as this proposal.

- The tuition to attend the Center for Electrology rose from $12,500 in 2024 to $15,000 in 2025 - a nearly 20% increase in a single year. Changing our requirements at this time

would give that school a monopoly on an industry that is already challenging to enter, and will quickly become financially unattainable.

- Having attended the Center for Electrology for my own training, I have seen firsthand how little direct oversight their students receive due to the rising student/teacher ratio in their classes. I was determined to learn regardless, but simply calling yourself an "electrology school" doesn't guarantee the quality of the education you pass on.

If the Oregon electrology industry or OHA is concerned about the quality of training new electrologists receive, I suggest revising the educational standards rather than the supervisory standards. Our electrology education is still based on textbooks from the 1960's, and is still taken on scantron! Let's update those standards before we narrow the pathway.

Thank you for your consideration,
Lissa Martin LE
Prismatic Electrology

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To Anne Thompson and the Board:

I am submitting this comment to back the OALE petition and to call out something happening right inside the Board that is unacceptable.

As someone who recently moved to Oregon and had been looking at job opportunities in electrology, I was referred to PNW Electrology. It was there that I learned that the chairside training model is not being used just to educate people, it is being exploited for cheap labor and debt traps. Look at the attached "Oregon Intern Agreement" from Pacific Northwest Electrology, owned by sitting Board member Audrey Jones. (I have also transcribed a copy of the paper I had received and scanned in, I have pasted that below.)

This agreement forces licensed practitioners to sign away 8,000 hours of their life (four full years of full-time work). If an intern walks away early, Audrey Jones bills them up to $16,000 plus court costs.

This is a classic stay-or-pay debt trap. Federal agencies like the FTC and NLRB are actively cracking down on these exact contracts because holding a $16,000 fine over someone's head to force four years of labor is predatory. Paying minimum wage and/or commission does not change the fact that this is financial extortion disguised as mentorship.

On top of that, Real You Electrolysis out of Vancouver, which is currently under federal investigation for labor abuses exactly like this, has been publicly sending clients and trainees directly to PNW Electrology.

Having a sitting Board member run a $16,000 debt scheme out of her private clinic completely destroys the credibility of this regulatory body. What is in place to protect trainees and clients? Who is overseeing this and allowing this sort of practice to take place? Private shop owners shouldn't be using state supervisor titles to profit off of trainees. Grant OALE's petition and move to shut down this shop training model once and for all.

Please note I am newer to this area and wish to remain anonymous in fear of retaliation.

Trascribed version of the attached document:

Oregon Intern Agreement

Pacific Northwest Electrology LLC (PNW Electrology) agrees to provide theory-based electrolysis training and hands-on electrolysis training for _____ (from here on known as intern). Intern already has an active Oregon License and is seeking additional training to learn specific tips and techniques from PNW Electrology.

In exchange for receiving electrolysis training from Audrey Jones or another licensed electrolysis supervisor at PNW Electrology, the intern agrees to work full time (35-40hrs/week) for at least 8000 hours at PNW Electrology after completing hands on training. Intern is expected to cover the cost of their loupes and any theory textbooks needed.

Once the intern begins taking paid electrolysis clients as an employee of PNW Electrology, those paid hours begin counting towards the 8000 hour employment requirement.

Electrolysis schools typically cost upwards of $15-20k in tuition, $5k+ room/board/travel and time away from work, so PNW Electrology has offered to assist with this expense by educating interns and having them complete hands on training close to home as well as provide additional hands on instruction/guidance during future employment at PNW Electrology.

If the intern decides not to transition to employment with PNW Electrology after finishing all of their electrolysis hands on training or if employment is ended before the 8000 hour mark is met: The intern will be responsible for reimbursing PNW Electrology $2000 for every 1000 employment hours not worked with a max of $16,000.00. (Example: if only 2400 hours were worked, $11,200.00 is due)

If employment ends before the agreed upon terms and the intern refuses to pay the owed amount to PNW Electrology, any legal expenses incurred by Audrey Jones or PNW Electrology LLC to secure the owed payments from the intern will be the responsibility of the intern and will be added to the final repayment amount owed by the intern.

(Intern Name Printed)_____
(Signature)_____(Date)_____

(Owner Name
Printed)_____(Signature)_____(Date)_____

(Witness Name
Printed)_____(Signature)_____(Date)_____
****

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August 31, 2026

Public Comment – Oregon Electrology Training and Supervisor Standards

Petition for Rulemaking Under ORS 183.390 — Reform of Electrology Chairside Training and Supervisor Standards

Email: anne.p.thompson@oha.oregon.gov

Dear Ms. Thompson and Members of the Board:

I am submitting these comments regarding Oregon's electrology temporary trainee and supervisor standards.

I have been a practicing electrologist for more than three decades and have approximately 24 years of experience educating electrology students. Based on that experience, I strongly support increasing Oregon's qualifications for individuals entrusted with training future electrologists.

I also believe Oregon should carefully reconsider chairside training as a primary pathway to entry into the profession.

Being Qualified to Practice Is Not the Same as Being Qualified to Teach

One of my greatest concerns with Oregon's current system is the relatively short period of professional experience required before an electrologist can become a supervisor.

There are three very different stages of professional development:

First, we educate the student.

Then, the graduate develops into an experienced practitioner.

Only after gaining substantial professional experience and judgment should the practitioner assume responsibility for educating the next generation.

A license establishes that an individual has met the requirements to enter independent practice. It does not automatically establish that the individual possesses the depth of knowledge, experience, theoretical understanding, or teaching ability necessary to educate someone else.

In my professional opinion, two years of practice moves an individual from practitioner to educator too quickly.

I support increasing Oregon's minimum supervisor experience requirement to at least five years.

Electrology Experience Develops Over Years

There is another important reason why the number of years in practice matters.

A student does not graduate from an electrology program having personally followed numerous clients through an entire course of permanent hair removal from beginning to completion.

Hair grows in cycles. Permanent hair removal is achieved through a series of treatments, and individual cases often span many months. It may take approximately a year or longer for an electrologist to observe a client's case and evaluate treatment decisions.

The first several years of professional practice therefore provide experience that cannot simply be accelerated.

During these years, an electrologist continues to develop judgment by observing various hair-growth patterns, skin responses, treatment areas, client circumstances, difficult insertions, treatment variables, and the long-term results of treatment decisions.

An educator needs that depth of experience because the responsibility is no longer simply performing the procedure correctly. The educator must be able to recognize incorrect technique, understand why it is incorrect, anticipate its consequences, explain the underlying theory, and teach the trainee how to correct it.

Electrology Requires Substantial Theory as Well as Practical Skill

Electrology education is much more than learning to insert a probe and remove a hair.

Students must develop an understanding of anatomy and physiology; hair and skin biology; hair growth cycles; electricity; equipment; galvanic electrolysis; thermolysis; blending; infection prevention; treatment planning; treatment variables; tissue response; contraindications and precautions; client consultation; documentation; and professional responsibilities.

They must then learn to apply that theory safely to an individual client.

This is why I believe an electrology supervisor should demonstrate competence in both theoretical and practical electrology and participate in meaningful continuing professional education.

The ability to perform electrology successfully does not automatically mean that an individual knows how to teach electrology successfully.

My Concern with Chairside Training

After approximately 24 years of teaching electrology, I personally do not support chairside training as the primary educational pathway for preparing a person for independent practice.

My concern is not that experienced practitioners have nothing to teach. Experienced electrologists can be extraordinary mentors.

My concern is with the structure of chairside training itself.

A private electrology practice exists primarily to provide services to clients. The electrologist must maintain appointments and generate the necessary income to operate the practice.

An electrology school exists primarily to educate students.

That distinction matters.

A beginning electrology student needs significant attention from the instructor. The instructor must observe insertions, evaluate treatment settings and timing, monitor tissue response, evaluate hair release, correct technique, demonstrate procedures, answer questions, evaluate infection-prevention practices, connect practical procedures with theory, and determine whether the student is developing competency.

This requires time and attention.

When a chairside supervisor must simultaneously maintain a schedule of paying clients, I believe it is reasonable for Oregon to ask how much continuous instruction and direct observation can realistically be provided to a trainee throughout the training day.

This is not an accusation against individual supervisors. Many undoubtedly have sincere intentions and want to help others enter the profession.

It is a question about whether the structure itself reliably supports excellent education.

Presence Is Not the Same as Education

I believe Oregon should make an important distinction between time spent in a practice and actual instructional time.

A trainee's presence in an electrology office does not necessarily mean the trainee is receiving instruction.

Likewise, a supervisor being somewhere within the practice does not necessarily mean that the trainee is receiving meaningful direct supervision.

Training hours should measure education, not simply time or presence.

A genuine educational hour should have an educational purpose. It may involve theoretical instruction, instructor demonstration, supervised practical training, direct observation, correction, evaluation, testing, or other documented learning activities.

Simply accumulating hours should not be the objective.

Developing competency should be the objective.

Oregon's Supervisor-to-Trainee Ratio Deserves Careful Consideration

I am particularly concerned about combining a relatively low experience requirement for supervisors with Oregon's allowance for one supervisor to oversee multiple electrology trainees.

Consider the practical situation of one electrologist operating a private practice, treating paying clients, and simultaneously being responsible for several beginning trainees.

Each trainee may need the supervisor to observe an insertion, evaluate a treatment, examine tissue response, correct technique, answer a question, or intervene when something is being performed improperly.

How much meaningful direct instruction can one individual provide to several beginning trainees while also meeting the obligations of a working electrology practice?

I believe this deserves serious consideration.

Oregon's Tattoo Training Standard Provides a Useful Comparison

I also respectfully ask the Board to consider Oregon's approach to practical education in another profession regulated by the Board.

Oregon requires one-to-one student/teacher direct supervision when a tattoo student performs practical training on the general public. Direct supervision requires the teacher to be present and actively involved in the student's oversight and training.

I recognize that tattooing and electrology are different professions, and I am not suggesting that their requirements must be identical.

However, the comparison raises an important question:

If Oregon considers one-to-one direct supervision appropriate when a tattoo student performs a procedure on a member of the public, why should one electrology supervisor be permitted to directly supervise as many as four trainees performing procedures on members of the public?

The underlying public-safety principle deserves consideration in both professions.

Precision and Public Safety

Electrology is an extremely precise procedure.

We work with individual hair follicles using a very fine probe and electrical energy. Proper insertion matters. Treatment variables matter. Tissue response matters. Infection prevention matters.

I sometimes use an analogy when discussing education.

I am not suggesting that electrology is surgery or that electrologists are surgeons. However, when we consider a procedure requiring this degree of precision and having the potential to injure tissue when performed improperly, we should ask ourselves:

Would we want someone to learn a precise procedure from us without an experienced educator closely observing and correcting their technique?

That is the important point.

A beginner student needs supervision while developing competency—not after an error has already occurred.

Why I Champion Formal Electrology Schools

I strongly support formal electrology education through schools operating under appropriate state educational and regulatory oversight.

The primary business of an electrology school is education.

Its responsibility should be to train new electrologists to become competent entry-level practitioners capable of providing safe and effective permanent hair removal.

In a properly regulated school environment, there should be an established curriculum, educational objectives, required theory and practical training, qualified instructors, attendance records, examinations, competency evaluations, infection-prevention standards, student records, and regulatory accountability.

Most importantly, instructors are there to teach.

I do not suggest that every school automatically provides excellent education or that every chairside supervisor provides inadequate education. Quality standards and accountability are necessary in either environment.

However, I believe a properly regulated school provides a stronger structure for consistent education, instructor accountability, student evaluation, and public protection.

If Oregon Retains Chairside Training

Although I personally favor formal school education over chairside training, I recognize that Oregon may decide to retain the temporary-trainee pathway.

If it does, I encourage the Board to substantially strengthen the system.

I recommend consideration of:

Provide a pathway for membership in the Oregon Electrologists' & Association and the American Electrology Association AEA.

1. **At least five years of active electrology practice before an individual may become an approved supervisor.**
2. **Demonstrated competency in both electrology theory and practical technique.**
3. **Meaningful continuing professional education beyond the education required for initial licensure.**
4. **Education specifically addressing teaching and supervisory responsibilities.**
5. **A clearly defined theory and practical curriculum for chairside trainees.**
6. **Clear definitions distinguishing theory instruction, instructor demonstration, directly supervised practical training, indirectly supervised activity, and independent practice.**
7. **Documented competency evaluations rather than relying primarily upon accumulated hours.**
8. **Reconsideration of the number of trainees one supervisor may directly supervise while procedures are being performed on the public.**
9. **Clear documentation demonstrating what education actually occurred during reported training hours.**

Professional certification, including the Certified Professional Electrologist (CPE) credential, may be one valuable means of demonstrating continued professional development. However, my greater concern is that every individual entrusted with training future electrologists should demonstrate the education, experience, theoretical knowledge, practical competence, and professional judgment necessary to serve as an educator.

The Question Should Be Competency

After approximately 24 years of educating electrology students, I believe we should ask more than:

How many hours did this trainee complete?

We should ask:

Who taught the trainee?

Was that individual qualified to teach?

What theory was taught?

How much direct instruction and observation actually occurred?

Was incorrect technique identified and corrected?

Was the trainee evaluated objectively?

Did the trainee demonstrate competency before being permitted to independently treat the public?

Those questions matter more than the accumulation of hours alone.

The true test of an educational program occurs when the graduate or trainee is alone with a client and there is no instructor standing beside them.

Does that new electrologist understand what they are doing and why?

Can they perform accurate insertions?

Can they select and apply appropriate treatment?

Can they recognize improper treatment and concerning tissue response?

Do they understand infection prevention?

Can they make sound treatment decisions independently?

And can they provide safe and effective permanent hair removal?

That is what electrology education must accomplish.

Conclusion

I believe electrology is frequently misunderstood by those outside our profession because the complexity of what occurs during treatment is not always apparent.

For those of us who have practiced and taught electrology for many years, however, the responsibility is very clear.

We are working on members of the public, and **client safety must be our highest priority**.

The purpose of stronger educational standards should not be to make entry into the profession unnecessarily difficult, nor should it be to protect schools or restrict competition.

It should be about protecting the public.

We should not simply produce more electrologists. We should prepare competent electrologists who understand the science and theory behind what they do, possess the practical skills to perform it correctly, recognize when something is wrong, and place their clients' safety first.

The standard for becoming an educator should be higher than the standard for becoming a practitioner.

And regardless of the educational pathway Oregon ultimately chooses to recognize:

Client safety should be the standard by which that pathway is measured.

Thank you for the opportunity to provide my comments and for considering the perspective of those who have dedicated many years to electrology practice and education.

Respectfully,

Randa L. Thurman, LE, CPE
Director/Instructor
Monterey Bay Institute of Electrology

September 10th, 2026

Public Comment

Re: “Petition for Rulemaking Under ORS 183.390 — Reform of Electrology Chairside Training and Supervisor Standards Rule Change Comment”

Dear Oregon Health Licensing Office and Whom it May Concern,

I write this public comment in response to the petition filed by OALE requesting reform of the Electrology supervisor standards rule.

I would like to share the following:

-TRAP agreements are egregious, there is no objection from me to petition banning them.

-Since the rule change proposal, it was discovered that those of us recently minted apprentice trainers who undertook electrology training in Oregon post-pandemic (when an Oregon school did not exist) currently cannot sit for the CPE exam. To do so would require either: (1) 320 hours (re)training out of state/not commute distance, or (2) redoing our entire 600 hour training locally now that Oregon has an AEA certified electrology school.

-This is an undue burden to meet within 12 months for our existing client obligations (including for HB 2002 GAC-gender affirming care), business health, physical work health and personal welfare.

-About 145 currently licensed Oregon electrologists only meets a fraction of the existing client demand partly evidenced by: in recent years the huge spike in HB 2002 related GAC clients (who typically need much more electrolysis work), frequent new client queries, current provider wait lists, the lack of sufficient electrolysis providers taking insurance, lengthy time to contract with insurances as electrolysis providers, and other issues/barriers.

-There is currently only one electrology training school in Oregon/within commuting distance.

-Should some major event occur again causing electrologists to mass leave working in this field despite high demand (and/or this school folding), there would likely be a new shortage of electrologists locally.

Therefore:

-"OALE proposes a limited transition for existing HLO-approved supervisors only who do not yet meet the proposed five-year practice requirement: the five-year requirement would be temporarily suspended until the supervisor reaches five years of active practice, provided the supervisor obtains CPE certification within one year of the rule's effective date." If the proposed rule change or similar is effectuated, the above from the rule proposal is requested to be added directly to this new rule, Exhibit A "Proposed Amendment to 331-910-0024 Requirements For Electrology Supervisor" section (1)(c) for clarity.

-Also, to avoid above stated disruptions, hopefully the proposal language and intent for the above quote includes continuing as supervisors while obtaining CPE certification within 12 months. It is requested that this be clarified as explicitly included as well, or added should the above quoted part of the proposed rule go forward.

Counter Proposals:

(1) The rule change proposed be amended to only ban TRAP agreements. For the above reasons, the remainder of the proposed rule change be tabled for consideration for one year or until a second Oregon electrology school be established. Upholding existing health and safety protocols strongly is encouraged. OR

(2) To not be an undue burden, the proposed rule (with the continuance as supervisors clarification above) be amended to provide 18 months for additional training to sit for and pass the CPE exam as above for apprentice trainers with under five years experience as electrologists.

Thank you,

Heather Carissa Hannigan, LE

September 7th, 2026

Public Comment

Re: “Petition for Rulemaking Under ORS 183.390 — Reform of Electrology Chairside Training and Supervisor Standards Rule Change Comment”

Dear Oregon Health Licensing Office and Whom it May Concern,

On behalf of Basic Rights Oregon, the longest standing LGBTQ+ rights organization in Oregon, I am reaching out with concern about the recent petition filed by OALE. Our organization’s mission is to ensure that all LGBTQ2SIA+ Oregonians live free from discrimination and be treated with dignity and respect in every community in our state. We find issue with a few of the requested changes in the petition to the supervisor standards rule and would approve of the recommendation of some other elements of the petition we will detail below. Our organization cares deeply about patient safety alongside access.

Our organizations investment in these rules dates back to 2021 when our organization detected a massive set of waitlists and a bottleneck in access to gender affirming healthcare procedures due to the lack of licensed electrologists who took insurance (especially Medicaid), a lack of cultural competency of providers working with the transgender population seeking these services, a lack of geographic diversity of location of electrology providers, a lack of a current school in Oregon for those seeking to go into this work, workforce development issues, and outdated licensing requirements limiting new students going into this workforce.

Since 2021, we have advocated to expand licensing requirements to improve the number of licensed providers to meet the demand in our state. A school has now officially formed and opened in Oregon for folks looking to go into this field. Individuals are more often being mentored on how to take insurance and navigate billing insurance so providers aren’t only accepting private pay and can meet the demand of Medicaid patients. With all of these changes and an increase in licensed providers, its been reported to us from providers that the demand **still remains** very high for Electrology statewide, especially for providers who take OHP or private insurance coverage. Workforce development for this field remains ongoing and is not “solved” as this OALE petition seems to convey. While the additional number of licensed electrologists has increased, the work is ongoing to meet the patient demand. Our organization cares deeply about patient safety and appreciates the discussion of this important topic to make sure harm is not happening consistently to patients in Oregon due to current rule.

This petition filed by OALE cites their reasoning for the petition being caused by incidents taking place at a specific clinic, Real You, located out of state in Washington state. In the petition, it is not made clear that Oregon administrative rule 331-910-0024 was the cause of the harm caused in Washington. It states, *“At least one electrologist associated with Real You's in-house training program appears on the Oregon Health Licensing Office's Approved Electrology Supervisor List despite having held an Oregon electrology license for less than two years.”* This

shows that a supervisor who had ***not met*** Oregon supervisor rule standards was approved by HLO and supervised in Washington, this inherently doesn't logically prompt a rule change in

Oregon but points to an issue with the approval process that approved someone ***without*** 2 years of required training.

Their suggested solution ignores the barriers that their suggestions will also present for current supervisors and students. This will have an impact on the waitlists and current demand for healthcare services. In the petition, there were no cited incidents of supervisors who have 2 years of experience harming patients.

Regarding the suggested changes to the rule of CPE certification, it is critical to note that there was no school for a long period of time in Oregon until recently. This meant that licensed electrologists in this field in between a school's existence in Oregon were apprenticeship graduates. It is our learned understanding that as apprentice graduates and licensed electrologists that are current supervisors who are approved by the state and authorized to supervise cannot sit for the CPE exam to get grandfathered in under this proposed rule change. Under this proposed rule, providers would have to redo their entire electrology training. The limited transition for existing HLO-approved supervisors required a suggested CPE certification within 1 year of the rule becoming effective. This brings up a new issue.

The AEA is the organization providing CPE, it is a certification which requirements are defined by the AEA themselves. The AEA has historically refused to have options for preferred names and require transgender members without legal name changes to out selves whenever obtaining continued education credits or attending conferences. In a field where transgender individuals are increasingly becoming a part of the workforce to fill a gap where a population historically could not find care effectively or care that took their insurance, this is important and a discriminatory barrier of an organization that should not be included as a requirement in Oregon administrative rule unless addressed by the association.

It is our understanding that the AEA does not allow apprentices to join or gain CPE certification. If one were to continue to be a supervisor under their proposal, an LE would have to go through an entire electrology program all over again from the start just to be able to join AEA and gain CPE and that electrology program would need to be an AEA member.

Additionally, there are currently newly approved trainees who will be working with authorized supervisors that would no longer have a place to train and supervisors would be financially impacted. This was not acknowledged in the financial impact statement in the petition.

From connecting with transgender electrologists across the state, our organization found there was overall agreement that Training Repayment Agreement Provisions (TRAPs) and workplace conditions at the Washington cited clinic should be prevented in Oregon. There was overwhelming agreement that TRAPs (Any agreement that locks an apprentice into employment in exchange for education or for which it can be perceived wages are diminished as part of that

cost or any agreement in which an apprentice pays for education with a promise of employment after education, in which it could be a fee for employment) should be prevented.

Our organization would be in favor of a rule preventing these in Oregon. As for the rest of the suggested requirements, our public comment remains in opposition due to discriminatory and negative financial implications for many individuals in our state.

Seth Johnstone (he/him)

Policy and Research Director

Basic Rights Oregon

503-222-6151 ext 105

seth@basicrights.org

Public comment re: “Petition for Rulemaking Under ORS 183.390 — Reform of Electrology Chairside Training and Supervisor Standards Rule Change Comment”

Dear Ms. Thompson and Members of the Board:

I am writing to respectfully request that you **eliminate the proposed Subsection (1)(c) while maintaining the proposed Subsection (1)(d)**, as written in the proposed amendment to 331-910-0024 (Exhibit A, page 6). The proposed Subsection (1)(c) is unnecessary, runs contrary to other states’ requirements, risks making some of Oregon’s current supervisors permanently ineligible to supervise, and demonstrates a financial conflict of interest in the Petitioners.

To address the points raised by the Petition:

- While the number of licensed electrologists in Oregon has nearly doubled, not all of those individuals are currently practicing and demand continues to surge as electrology becomes more widely available as a health insurance benefit, primarily to transgender individuals. Oregon’s strong protections for transgender rights have resulted in an ongoing influx of trans individuals from other states, which continues to increase demand for electrology. In short, **demand for electrology still vastly outstrips the supply of new providers**.
- The Petition states that two years of practice is insufficient to develop the competency necessary to train others, but does not offer any evidence of harm (such as statistics of injury rates, board complaints, etc) caused by practitioners or supervisors with 2 to 5 years of work experience. Furthermore, **most other states require less than five years of licensure for their apprentice supervisors.** I have collated the requirements of all other states with apprenticeship pathways (according to the American Electrology Association) in the table below. Three states have no licensure time requirement, one other state requires 2 years of licensure, two states required 3 years of licensure, and three states required 5 years of licensure.

State	Additional Requirements	Source
California	NONE; any licensee can instruct an apprentice	https://www.barbercosmo.ca.gov/applicants/apprenticeship.shtml
Delaware	NONE; any licensee can instruct an apprentice	https://dpr.delaware.gov/boards/cosmetology/apprenticeship/
Hawaii	-2 years of licensure	https://cca.hawaii.gov/wp-content/uploads/2026/02/har_113-c2.pdf
Idaho	-5 years of licensure -3 mos of teaching instruction -12 college credits or equivalent	https://legislature.idaho.gov/statutesrules/idstat/Title54/T54CH58/SECT54-5810/
Kansas	-3 years of licensure (Requirement may be waived for “electrology shop” apprenticeships; law is unclear)	https://www.kansas.gov/kboc/public-documents/docs/COS-PRO/law-book.pdf
Louisiana	-5 years of licensure -225 hrs teaching instruction w/ test	https://www.legis.la.gov/legis/Law.aspx?p=y&d=93904
Michigan	NONE; any licensee can instruct an apprentice	https://www.michigan.gov/lara/-/media/Project/Websites/lara/bpl/Cosmetology/Licensing-Info/Apprenticeship-Licensing-Guide--FAQ-12626.pdf

Nevada	-3 years of licensure	https://c13d79bc-ed41-40cf-89ca-4d170ab6500e.filesusr.com/ugd/505bd6_020e6375c4834cfe9b9c1dc9bf64d664.pdf
Rhode Island	-5 years of licensure -Pass state instructor test	https://webserver.rilegislature.gov/Statutes/TITLE5/5-32/5-32-20.htm

- The Petition attempts to establish evidence of a disparity in rigor between the school and apprenticeship pathways, but it ignores the issue at hand—currently, there are NO requirements for licensure time or additional certifications in order to become a teacher at an Oregon electrology school. Most of the states listed above have equal or stronger requirements for teachers at a school than for apprentice supervisors—only Hawaii and Nevada had an explicit licensure time requirement for apprentice supervisors but not school instructors (and Nevada requires a separate instructor certification program at a licensed school). **Oregon already has higher standards for its apprentice supervisors than for teachers at its school, and making the disparity greater will be contrary to other states' policies**. Additionally, given the significantly higher volume of students through the school than through apprenticeships, any lack of instructor standards will have a much higher impact there.

- The Petition cites fears that individuals are seeking to become supervisors for financial gain but the math doesn't add up. Electrologists can easily make over $100/hr doing electrology, and licensure requires 600 hrs of training. Even if only half of those hours are spent directly supervising or interacting with students, an electrologist could make over $30,000 practicing for the same amount of time. Given that the local school costs $15,000, a supervisor would have to take on at least three students simultaneously without significantly increasing the total hands-on hours to be able to offer a lower fee than the school and still make more money than they could simply practicing the business. If the Board wishes to completely eliminate the financial incentive to take apprentices, restricting the number who can be supervised simultaneously to 2 would be an easier and more equitable method.

- Some people may try to exploit the system, but others are using it to make this career available to those unable to afford the steep cost of the local school—I know at least two supervisors who have trained apprentices completely for free. Tuition at Oregon's only school is $15,000, the highest this side of the Mississippi. Other schools have much lower tuitions: Zapmaster (WA)-$13,500; Monterey Bay Institute of Electrology (CA)-$11,200; AIE Electrology (CA)-$9,870; California Electrology Academy-$12,000; Cameo College (UT)-$6,000; Utah School of Hair Removal-$8,500. It is cheaper to move to Utah or California for several months than to attend the school in Oregon, and has been since it opened. At least one electrologist licensed this year took that exact route for that exact reason. **Apprenticeships provide a lower cost or free alternative to the school and it is important not to restrict the opportunity they provide.**

- The Petition proposes requiring Certified Professional Electrologist (CPE) status as a metric of competency, which **opens up a number of Oregon's electrologists, including current supervisors, to permanent disqualification**. The American Electrology Association does not allow individuals who were trained as apprentices to sit for the CPE exam, meaning that any electrologist who graduated from the local school before it was accredited would be permanently ineligible to be supervisors. This includes at least one current supervisor and several other electrologists interested in becoming supervisors. As noted before, this

requirement does not apply to the school instructors, and the current instructors do not meet it. **No other state requires this certification**.

- Receiving and maintaining CPE status requires contributing a significant amount of money to the AEA, which is inappropriate for the state to require. It costs $450 to take the CPE exam, and fees are charged to "register" the required continuing education credits to maintain the CPE (75 hrs every 5 years), unless they were obtained from an AEA event. The fee is $50 per event, with a limit of 10 hours awarded per event, so that a person who received all 75 CE hours from non-AEA events would still pay $400 to the AEA every five years. Becoming a supervisor will require paying *at minimum* $850 to the AEA. Given that this Petition was brought by an AEA affiliate, the OALE, **there is a clear conflict of financial interest**.

- While the Petition provides a path forward for current supervisors who do not meet the licensure time requirement, it does not account for those who are unable to ever receive the CPE, or those who have chosen not to. Anyone who has been considering becoming a supervisor but has not received the CPE will now have to wait an additional five years, regardless of how long they have been licensed.

- The case of **Real You Electrolysis highlights the need for protection against TRAP contracts, but does not demonstrate "systemic risk" from supervisors with 2-5 years of licensure**. The Petition states that the employee registered as a supervisor had been licensed for less than 2 years, meaning that they would have been in violation of the law already. While this clinic may provide an example of a bad actor in terms of labor practice, it is not reflective of the state of the apprenticeship pathway as a whole and should not be used as a reason to significantly restrict access to it.

Currently, **Oregon's requirements for apprentice supervisor qualification are in line with what other states require, which suggests that they do not need to be revised**. Where other states do have additional requirements, it is usually that trainers take an education course or pass an instruction test, since being a good electrologist does not necessarily translate to being a good teacher. **Other states *never* require supervisors to have a CPE or other certification offered by a private organization**. Where Oregon currently differs from other states is, in fact, with its lack of additional requirements necessary to be a school instructor. Apprenticeships constitute a minority of trainees and do not demonstrate a widespread threat to the profession, nor is there any evidence that supervisors with 2-5 years of experience are producing poor outcomes in their students or promoting public harm. In my opinion, **the proposed Subsection (1)(c) does not provide protections to the profession, trainees, or the public, and should be removed**. **The Proposed Subsection (1)(d) does provide good protection against financial exploitation and should be maintained.**

Sincerely,

Sabina Noll, LE
maidenhairelectrology@gmail.com
503-894-6163

Item for Board Action

ISSUE STATEMENT

DATE: Oct. 19, 2026

ISSUE:

The Board of Electrology and Body Art Practitioners received a petition for rulemaking on Aug. 13, 2026. The Board has 90 days to decide on the petition.

Options

Pursuant to ORS 183.390(3), when reviewing the petition, the agency must consider the following:

(a) The continued need for the rule;

(b) The nature of complaints or comments received concerning the rule from the public;

(c) The complexity of the rule;

(d) The extent to which the rule overlaps, duplicates or conflicts with other state rules or federal regulations and, to the extent feasible, with local government regulations;

(e) The degree to which technology, economic conditions or other factors have changed in the subject area affected by the rule; and

(f) The statutory citation or legal basis for the rule.

Public/Interested Parties' Feedback

Formal Request for Review of Oregon Electrology Temporary Trainee Supervisor Qualifications

May 4, 2026

Please let us know that you have received this notice:

Oregon Health Licensing Office
Board of Electrologists and Body Art Practitioners
1430 Tandem Ave. NE, Suite 180
Salem, OR 97301

Email: **To: Josh Page, Board Specialist,** Josh.Page@oha.oregon.gov
Phone: 503-378-8667

Re: Request for Review of Oregon Electrology Temporary Trainee Supervisor Qualifications and AEA Membership Eligibility Standards

Please forward or copy this communication to all staff members and Board representatives responsible for decision-making, review, and administration of the electrology temporary trainee training program. At your earliest convenience, please confirm receipt so we may ensure this information has reached the appropriate individuals for review.

Purpose of this request: AEA respectfully asks the Oregon Board to review whether Oregon's temporary trainee supervisor qualifications should be strengthened or clarified. Hence, Oregon-trained electrologists are better positioned to meet national professional association standards, participate in continuing education, and advance within the profession.

To the Members of the Oregon Board of Electrologists and Body Art Practitioners:

Following review by the American Electrology Association (AEA) Executive Board, I am writing in my capacity as Membership Chair to respectfully bring forward a concern regarding Oregon's electrology temporary trainee/apprenticeship pathway and its possible misalignment with AEA's national membership eligibility standards for apprenticeship-based electrology education.

I would also like to clarify my role in this matter. As Membership Chair, I do not independently create, amend, waive, or disregard AEA membership requirements. My responsibility is to apply and communicate the membership standards established through the American Electrology Association's governing process.

AEA membership requirements are reviewed and adopted through the association's governing structure. They reflect the collective standards of the national association, not the personal decision of the Membership Chair. When an applicant does not meet AEA's adopted apprenticeship-training requirements, the Membership Chair is responsible for applying those standards consistently.

This communication is not intended to challenge Oregon's authority to license electrologists under Oregon law. Oregon licensure is a matter of state authority. AEA membership eligibility is a separate professional association standard. The concern addressed here is the difference between Oregon's supervisor approval pathway and AEA's national membership requirements for applicants trained outside an electrology school.

Oregon's Temporary Trainee Pathway and the Standards Concern

According to Oregon's published licensure pathways, an applicant may qualify through the Electrology Training Program for Temporary Trainees. Oregon Administrative Rule 331-910-0007 describes an electrology training program requiring 600 hours of theory instruction and practical experience, including a minimum of 200 hours of theory, 400 hours of practical experience, and 400 practical procedures.

Oregon Administrative Rule 331-910-0024 permits an individual holding an Oregon electrology license to apply to become a supervisor for the temporary trainee training program.

The supervisor must hold an active Oregon electrology license, have no current or pending disciplinary action, and attest to having actively practiced electrology for at least 2 years before the date of application.

While Oregon may determine that this standard is sufficient for state-supervised licensure training, the standard does not meet AEA's separate apprenticeship-instructor requirement for national membership eligibility when the applicant was trained outside an electrology school.

AEA Membership Requirements

The AEA applies uniform membership requirements to all applicants, regardless of whether they were trained in a licensed state, an unlicensed state, a school setting, or an apprenticeship setting. These standards exist to ensure that every applicant has received verifiable, competent, and professionally accountable electrology education.

For applicants trained through an electrology school, AEA requires documentation such as a photocopy of the electrology school diploma, a current driver's license or other state-issued photo identification, and, where applicable, a copy of the current electrologist license.

For applicants trained outside of an electrology school, including those trained through apprenticeship-style pathways in licensed or unlicensed states, AEA requires documentation of training, identification, applicable licensure, and a notarized affidavit from an apprenticeship instructor who has been an AEA Certified Professional Electrologist in good standing for a minimum of five years.

The conflict arises when an Oregon-trained applicant has completed a state-approved temporary trainee pathway under a supervisor who satisfies Oregon's two-year requirement but does not satisfy AEA's CPE-in-good-standing-for-five-years apprenticeship instructor standard. These standards are not interchangeable. Oregon licensure may authorize a practitioner to practice within Oregon, but it does not automatically satisfy AEA's national membership standards for apprenticeship-based education.

Why Post-Licensure Experience Matters in Electrology Instruction

Electrology is a technical, invasive, and permanent hair-removal procedure. It involves follicular insertion, electrical current, skin response, sterilization, contraindication screening, documentation, ethics, and long-term evaluation of results. Proper instruction requires more than basic licensure; it requires advanced clinical judgment and a proven understanding of long-term outcomes.

A 600-hour training program prepares a student to begin practice and pursue licensure. It does not, by itself, establish that a new licensee has developed the long-term clinical judgment necessary to train another electrologist independently.

Permanent results are not fully evaluated at graduation or immediately after licensure. True permanent hair removal is observed over repeated treatments, multiple hair-growth cycles, client follow-up, tissue response, healing patterns, and gradual reduction of regrowth.

For this reason, AEA's apprenticeship-instructor standard requires a higher level of post-licensure professional development. From AEA's professional standards perspective, two years of licensure alone may not provide the same level of assurance as AEA's requirement that an apprenticeship instructor hold the CPE credential in good standing for a minimum of five years.

Impact on Oregon Practitioners and Professional Association Participation

This issue has consequences beyond a single membership application. Oregon's current temporary trainee pathway may allow a practitioner to become licensed in Oregon while still being unable to meet AEA's national membership eligibility standards for apprenticeship-based training.

That discrepancy may limit some Oregon-trained electrologists from participating fully in the Oregon Association of Electrologists and the American Electrology Association, including access to professional networking, continuing education, ethics resources, leadership development, and national professional support.

AEA's purpose is not to exclude Oregon practitioners. The purpose of AEA membership standards is to preserve consistent national expectations for training, competency, accountability, and public safety.

Strengthening or clarifying Oregon's supervisor qualifications would help future Oregon-trained electrologists better align with professional association expectations.

Clarification Regarding Website Language

Recent questions have been raised regarding whether a subsection of AEA's apprenticeship-instructor requirement was clearly visible on the website at the time of application. AEA is reviewing website formatting to ensure that the requirement is presented clearly and consistently.

However, website formatting does not change or override adopted association standards. AEA's requirement has consistently been that an apprenticeship instructor must be an AEA Certified Professional Electrologist in good standing for a minimum of five years when the applicant's training occurred outside an electrology school.

Public-Safety and Professional Standards Considerations

This concern is not directed at any individual student, instructor, supervisor, or Oregon licensee. The issue is the discrepancy in pathways and standards that it may create for Oregon-trained applicants seeking membership in national professional associations.

The public assumes that a licensed electrologist has received education, supervision, and training sufficient to support safe practice. When state pathways differ significantly from national association standards, students, clients, supervisors, and professional organizations may find themselves in a difficult position.

Training standards should reflect the responsibilities involved in performing electrology services, including proper insertion techniques, infection-control practices, galvanic, thermolysis, and blend modalities, treatment planning, client safety, contraindications and complications, documentation, and ethical practice.

Request for Board Review

AEA respectfully encourages the Oregon Board of Electrologists and Body Art Practitioners to review the implications of the current temporary trainee/apprenticeship model and consider whether Oregon's supervisor qualifications should be strengthened or clarified.

At a minimum, the Board may wish to consider whether apprenticeship supervisors should be required to demonstrate a longer period of active electrology practice, advanced professional credentialing such as CPE status, documented teaching competency, completion of continuing education related to electrology instruction, and clearer standards for apprenticeship documentation and trainer accountability.

Such changes would not weaken Oregon's pathway. They would strengthen it by better protecting the public, improving consistency in training, supporting the credibility of Oregon licensees, and helping Oregon-trained practitioners participate more fully in state and national professional organizations.

Conclusion

The AEA remains committed to supporting electrologists in every state, including Oregon. This communication is intended to identify a standards discrepancy that may affect Oregon-trained applicants seeking AEA membership through an apprenticeship-based training pathway.

AEA's Membership Chair cannot waive or lower national membership standards that have been adopted through the association's governing process. A 600-hour training program prepares a student to begin practice. It does not, by itself, prepare a new licensee to become an instructor of another electrologist. Apprenticeship instruction requires advanced experience, proven judgment, and the ability to evaluate long-term outcomes.

AEA respectfully asks the Board to review this discrepancy and consider whether Oregon's supervisor qualifications should be strengthened or further clarified to support students, protect the public, and help Oregon-trained electrologists participate more fully in state and national professional communities.

Thank you for your attention to this matter. I remain available to discuss these concerns further and to support Oregon in strengthening its training pathway for the benefit of students, practitioners, and the public.

Respectfully submitted,

Randa L. Thurman, L.E., CPE
Membership Chair, American Electrology Association

cc: AEA President; AEA Executive Board

Oregon Health Licensing Office staff;

Oregon Association of Electrologists representatives, as applicable

Reference Notes

Oregon Administrative Rules, Division 910 - Electrology

OAR 331-910-0007 identifies the Electrology Training Program for Temporary Trainees as a 600-hour program, including 200 theory hours, 400 practical hours, and 400 practical procedures.

Oregon Administrative Rules, OAR 331-910-0024 - Requirements for Electrology Supervisor

The rule identifies supervisor approval requirements, including active Oregon electrology licensure, no current or pending disciplinary action, and attestation of at least two years of active electrology practice before application.

Oregon Administrative Rules, OAR 331-910-0025 - Application Requirements for Electrology License

The rule describes licensure pathways, including completion of an Electrology Training Program verified by a supervisor approved under OAR 331-910-0024.

Note: This document is drafted as a professional standards communication from AEA leadership for Board review. It is not intended to serve as legal advice.

Other Board Business