



BARBERING, COSMETOLOGY AND ESTHETICS

clearhq.org

The total cost of the *US Department of Labor; State Occupational Licensing Review and Reform Grant* program is \$244,260.28. \$244,260.28 (100%) is funded through a U.S. Department of Labor - Employment and Training Administration grant.

EXECUTIVE SUMMARY

In 2019, New Hampshire's Office of Professional and Occupational Licensure (OPLC) was awarded a grant by the U.S. Department of Labor, Employment and Training Administration (DOLETA) in the amount of \$244,260 to evaluate and streamline occupational licensing requirements to help address the effects of an aging population, opioid use and overdose deaths, and underemployment of certain untapped populations in the state's workforce.

New Hampshire's Occupational Licensing Review Project particularly sought to promote portability and reduce unnecessary licensing barriers, with special emphasis on populations that are most affected by licensing: low-income, military and justice-involved communities.

Through participation in the Occupational Licensing Learning Consortium facilitated by the National Conference of State Legislators (NCSL), the Council of State Government (CSG) and the National Governors Association (NGA), OPLC regularly engaged with other state grantees and regulatory subject matter experts to share learning, glean expert insight, and receive technical assistance for the state's licensing review. With the assistance of the Council on Licensure, Enforcement and Regulation (CLEAR), OPLC received licensing research and analysis, and subsequently to provide recommendations tailored to New Hampshire's regulatory infrastructure and environment.

New Hampshire's Office of Professional Licensure and Certification (OPLC) houses 40 professional licensing boards, commissions and councils and worked with the Council on Licensure, Enforcement and Regulation (CLEAR) to conduct an occupational licensing review and reform analysis on five (5) license categories: Alcohol and Other Drug Use Professionals; Office of Allied Health Professionals (including Occupational and Physical Therapist Assistants and Respiratory Care Providers); Barbering, Cosmetology, and Esthetics; Licensed Nursing Assistant, and Pharmacy Technician.

This final report contains CLEAR's findings from the Occupational Licensing Review Project. It is intended to be a comprehensive report of all accomplishments under the grant project and therefore also includes OPLC's accomplishments in fulfillment of its scope of work with DOLETA, some of which occurred without assistance from CLEAR.

The report provides an overview and discussion of the regulatory landscape, research and emerging practices concerning the special populations and focus areas selected by New Hampshire for the grant project. This is followed by promising practices from other umbrella agencies and standout innovations that could be leveraged by OPLC through its umbrella structure. The report summarized other accomplishments such as key legislation, operational improvements and technology advancements that were also accomplished during through the grant project. Lastly, this report delves into tailored analysis of the five professions applying a comparison to emerging practices and priority policies expressed by the state.¹

Key findings of the Occupational Licensing Review Project reveal several innovative and promising practices implemented by New Hampshire boards particularly related to entry to practice and labor mobility. Many of these relate to streamlined licensing process, helping applicants get to work quickly even through temporary permits while the board completes its due diligence. New Hampshire has broadly aligned entry to practice requirements to national averages and standards which bolsters reciprocity applicants and licensees. Early adoption and membership to licensure compacts further advances licensure portability.

New Hampshire boards reviewed as part of this project have generally not adopted more progressive policies concerning low-income applicants, military servicemembers, veterans and spouses, and individuals with criminal convictions. Some New Hampshire boards demonstrate promising practices that could serve as a model for other state licensing boards. Broad adoption of these practices or improvements to existing policies could promote greater fairness and equity in the licensure process, particularly for communities of color who are more likely also come from low-income communities and have a criminal record.

Several key findings of the project could be solved or partially accomplished through improved licensing technology, specifically through advancements in MLO or another licensing database. Improved technology, which is now widely accessible in the occupational licensing field, could dramatically reduce regulatory burden by creating efficiencies in the administrative process

¹These findings and recommendations are not considered legal advice nor should be construed as the opinion of CLEAR or its members. Where possible, alternatives are provided in an acknowledgement that a perceived barrier could be reduced through a plethora of potential solutions. The findings and recommendations must also be considered in context of the audience's intended outcomes which may vary among policymakers, board members, consumers and other stakeholders.

for both applicants and OPLC staff. Additionally, an improved data base could facilitate greater adoption of evidence-based regulations which evaluate characteristics of consumer endangerment and target regulatory interventions.

While this report makes tailored recommendations for consideration by each board, OPLC and other state policymakers may consider more sweeping initiatives that would support all boards. These strategies could include:

- Advance intentional staff and board member training on regulatory research and science, not just the practice act
- Improve My Licensing Office (MLO) or other technology to reduce regulatory burden and facilitate regulatory intelligence through data
- Improve operational effectiveness and efficiency through technology and rule reviews
- Public performance management through data collection and outcome tracking
- Consistent decision making among board members and over time to ensure fairness and equity
- Adopt evidence-informed regulations by evaluating regulatory data and outcomes
- Create a process to ensure boards align rules to statutes outside the practice act
- Embed a responsive regulatory culture through sunrise, sunset and routine regulatory review processes.

This final report provides in-depth analysis of research and findings related to Barbering, Cosmetology and Esthetics professions. These findings and recommendations are not considered legal advice nor should be construed as the opinion of CLEAR or its members. Where possible, alternatives are provided in an acknowledgement that a perceived barrier could be reduced through a plethora of potential solutions. The findings and recommendations must also be considered in context of the audience's intended outcomes which may vary among policymakers, board members, consumers and other stakeholders.

BARBERING, COSMETOLOGY AND ESTHETICS

Barbering and cosmetology provide haircutting, hairstyling, shaving, facials, and a wide range of other beauty services. Estheticians provide cosmetic and therapeutic skin care treatments and manicurists provide services specifically for fingernails and toenails. Each has specific scopes of practice of which cosmetologists have the most expansive practice.

The Board of Barbering, Cosmetology, and Esthetics also issues a variety of licenses. Considered specifically by this project are barbers, cosmetologists, estheticians and manicurist's licenses however the board also licenses shops, booth rentals, instructors and schools among others.

Generally, the outlook for these professions is very favorable meaning they are expected to experience a combined high rate of growth and a large number of annual job openings, providing the best employment opportunities through 2028. From 2018 - 2028,² New Hampshire Employment Security projects cosmetology will increase by 9.4 percent, manicuring by 11.1 percent and esthetics by 11.5 percent. Barbering is projected to experience a slightly lower growth rate at 7.5 percent likely given more conservative estimates in the number of job openings; however, the industry generally is seeing more barbers seek cosmetology licenses and therefore would enjoy the favorable growth rate for these professionals.

The chart below summarizes employment and wage data related to these occupations, as reported by New Hampshire Employment Security.³ Note barbers and estheticians are not listed separately in New Hampshire Employment Security's Occupational Employment and Wages publication.

² New Hampshire Employment Security. (2020, October). New Hampshire Job Outlook and Locator base year 2018 to projected year 2028. Retrieved February 22, 2021, from <https://www.nhes.nh.gov/elmi/products/documents/job-locator-intro.pdf>

³ New Hampshire Employment Security. (2020, June). STATEWIDE Occupational Employment & Wages. Retrieved February 22, 2021, from <https://www.nhes.nh.gov/elmi/products/documents/wages-state.pdf>

**BARBERS AND COSMETOLOGISTS WHICH INCLUDES
HAIRDRESSERS, HAIR STYLISTS, AND COSMETOLOGISTS**

Code:	39-5012
May 2019 estimated employment from Department of Labor	2,610
Number of NH licensed individuals	9,109
Number of NH licensed apprentices and work permits	27,159 (Apprentices = 16,010)
Entry Level Wage	\$8.91
Mean (Average) Wage	\$14.79
Median Wage	\$11.80
Experienced Wage	\$17.73
Living Wage Merrimack County	\$12.39
New Hampshire Minimum Wage	\$7.25

ESTHETICIANS AND MANICURISTS

Code:	39-5092
May 2019 estimated employment from Department of Labor	470
Number of NH licensed individuals	3,448
Number of NH licensed apprentices and work permits	12,770 (Apprentices = 6,757)
Entry Level Wage	\$13.65
Mean (Average) Wage	\$18.59
Median Wage	\$19.10
Experienced Wage	\$21.06
Living Wage Merrimack County	\$12.39
New Hampshire Minimum Wage	\$7.25

NEW APPLICANTS

CLEAR's review of entry requirements for original applicants considered emerging policies in the field such as multiple pathways, gradations of licensure, reliance or acceptance of national certifications and/or use of a national exam among others.⁴ Many of these items are established in statute or rule. CLEAR'S review also considered processes and policies such as the use of standing orders to allow a board or staff member to approve applications (either with and without ratification), communication, technology, and workflows. A review of these items ideally requires intensive observation of procedures and information which CLEAR could not feasibly undertake due to operational or legal constraints concerning confidential information. Instead, CLEAR interviewed board members, OPLC staff, and other stakeholders to glean major pain points throughout the process. Barriers to entry related to low-income applicants, military service members, veterans and military spouses, and applicants with criminal convictions are considered under subsequent sections.

ORIGINAL APPLICANTS

Original applicants seeking a license in one of these fields in New Hampshire and other states generally must complete a training program followed by supervised experience and passage of a national exam.

To become a barber, an applicant must:

- (a) *Be of good professional character;*
- (b) *Have completed high school or its equivalent;*
- (c) *Have received training of:*
 - (1) *A minimum of 800 hours of training in a school of barbering approved by the board; or*
 - (2) *A minimum of 1,600 hours distributed over a period of at least 12 months under a licensed barber who has engaged in the practice of barbering within the state for at least 2 years;*
- (d) *Pass an examination conducted by the board; and*
- (e) *Pay a fee established by the board.*⁵

To become a master barber, an applicant must:

- (a) *Be of good professional character;*
- (b) *Have completed high school or its equivalent;*
- (c) *Have received training of:*
 - (1) *A minimum of 1,500 hours of training in a school of master barbering approved by the board; or*
 - (2) *A minimum of 3,000 hours distributed over a period of at least 18 months under a licensed barber who has engaged in the practice of barbering within the state for at least 2 years;*
- (d) *Pass an examination conducted by the board; and*
- (e) *Pay a fee established by the board.*

To become a cosmetologist, an applicant must:

- (a) *Be of good professional character;*
- (b) *Have completed high school or its equivalent;*
- (c) *Have received training of:*
 - (1) *A minimum of 1,500 hours of training in a school of cosmetology approved by the board; or*
 - (2) *A minimum of 3,000 hours distributed over a period of at least 18 months under a licensed cosmetologist who has engaged in the practice of cosmetology within the state for at least 2 years;*
- (d) *Pass an examination conducted by the board; and*
- (e) *Pay a fee established by the board.*⁶

⁴ This report utilizes the term licensure and license generally to refer to state authorization to practice in a given profession or occupation. A board may provide such authority through a license, certification or registration. In this report, "license" is used to infer all three of these authorities.

⁵ NH RSA 313-A:10, I

⁶ NH RSA 313-A:11, I

To become a manicurist, an applicant must:

- (a) *Be of good professional character;*
 - (b) *Have completed high school or its equivalent;*
 - (e) *Pay a fee established by the board⁷;*
- and

I. Have completed a course of at least 300 hours of professional training in manicuring, in a school approved by the board and passed an examination conducted by the board.⁸

To become an esthetician, an applicant must:

- (a) *Be of good professional character;*
 - (b) *Have completed high school or its equivalent;*
 - (e) *Pay a fee established by the board⁹;*
- and

I. have completed a course of at least 600 hours of training in a school approved by the board and have passed an examination conducted by the board.¹⁰

The Board of Barbering, Cosmetology, and Esthetics leverages some highly effective provisions to demonstrate its fiduciary commitment to consumers, workers and the marketplace more generally. The Board has kept licensing requirements within industry standards (more on this in the next section on out-of-state applicants). The Board also issues a temporary permit to applicants that have completed all licensure requirements and are only waiting to pass the final examination.¹¹ The permit expires within 60 days but may be reissued if the applicant fails the first exam, a rehabilitative practice. This is an effective regulatory tool that provides the Board oversight of the applicant to protect the consumer while allowing that applicant to immediately begin work as they engage the licensing process. This also significantly reduces pressure on licensing timelines while preserving the Board's important consumer protection role. The success of the program is evident in the experience of one OPLC staff member who reported never having witnessed a disciplinary case against a temporary licensee in her 11 years of experience.¹² This process should be considered by other boards within OPLC to determine if such a process would be feasible for their unique practice environments.

The Board also features an exemption process which allows applicants to petition the Board if they do not meet certain qualifications. Board rules take the extra step to require the approval or denial of an application with 30 days of receipt. More states are adopting this same standard to identify license processing timelines in statute or rule to provide both transparency and accountability in the licensing process.

The gradations of licensure observed within the Board are also notable. As some economists have observed, gradations can provide a legitimate pathway into a profession and encourage other workforce infrastructure that benefits the state's residents and economy.¹³ It is notable that the low barriers and gradation of licensure also benefit other special populations in addition to the general public. Lower level licenses provide an easier entry to the profession and valuable experience as the applicant considers the investment and time to obtain a more advanced license. For example, a Barber can enter the profession with only 800 hours of training and then work towards a Master Barber license with 1,500 hours. These credentials can build upon each other. A manicurist requires only 300 hours to enter the profession and then could advance to an esthetician or cosmetologist. These policies are especially helpful given the minimum age to enter the profession is 16, providing young people with industry experience that does not rely on a college education.

An apprenticeship alternative also diversifies pathways into the profession and provides "earn and learn" opportunities which are discussed in the section below on low-income applicants.¹⁴

⁷ NH RSA 313-A:11, I, a, b and e, and NH RSA 313-A:12

⁸ NH RSA 313-A:12, I

⁹ NH RSA 313-A:11, I, a, b and e, and NH RSA 313-A:13

¹⁰ NH RSA 313-A:13

¹¹ NH RSA 313-A:18

¹² Ms. Kathryn Wantuck, Board Administrator, Barber, Cosmetology and Esthetics Board [Personal interview]. (March 20, 2019).

¹³ Redbird, B. (2017). The New Closed Shop? The Economic and Structural Effects of Occupational Licensure. *American Sociological Review*, 82(3), 600-624. doi:10.1177/0003122417706463

¹⁴ NH RSA313-A:24

The major pain points reported by stakeholders concerned operational workflows. Public stakeholders shared frustration with a recent change in the examination vendor which moved the testing site to a new location and purportedly moved the test date out six weeks, affecting the ability of students to get to the new test site while maintaining jobs to pay their student loans.

Internal OPLC stakeholders reported the time investment of processing licensing verifications for other states and wondered if this could not be easily automated through MLO, OPLC's electronic database, to reduce the workload burden. However, other OPLC boards have made it policy to point states to the online license verification process available on the website, an operational tweak that saves significant staff hours.

It was also reported the application process generates a lot of questions and therefore workload in customer service, despite efforts to present this information clearly and readily on the Board's website. The complexity of rules not just for barbers and cosmetologists, but also instructors, supervisors, schools, shops, booth rental and more can create an understandable web of confusion for an audience that lacks the same expertise in the regulatory process as a Board or staff member at OPLC.

The privileges granted to these license types do involve procedures, chemical and other practices that pose a risk to consumers if not practiced safely. The number of inspections and complaints that reveal violations concerning proper disinfection and application of these treatments demonstrates the value of these regulations. Further, the professions collectively are made up of many small business owners including a significant number that are minority owned and non-English speaking. Students face substantial risk from unscrupulous schools and human trafficking is known to hide behind salon business fronts. Licensing and inspection requirements are sometimes the first line of defense to detect wrongdoing, providing first and foremost accountability and sunshine. Furthermore, the regulations in New Hampshire are not all that different from other boards of barbering and cosmetology.

Boards can also undertake additional practices to help ease this burden of understanding for the majority of otherwise upstanding applicants, considering for example:

- The College of Physiotherapists of Ontario published a video series on YouTube, "Understanding the Regulated Health Professions Act", to help applicants and licensees understand industry regulations. See: <https://www.youtube.com/watch?v=kloI9ipYDDo>.
- The Ontario College of Dietitians maintains a YouTube site with multiple videos breaking down ethics and continuing competency requirements among others. See: <https://www.youtube.com/user/CollegeofDietitians>.
- The North Carolina Addiction Specialist Professional Practice Board publishes a brochure for the profession, providing a synopsis of the profession, outlining the scope of practice and detailing the licensure process. See: <https://www.ncsappb.org/wp-content/uploads/2018/05/Combined-CSAPC.pdf>
- Lean process improvement that engages board members and OPLC staff to collectively map the operational effects and potential savings created by regulations and consider more permissive rules that allow operational flexibility while preserving consumer protections.
- Utah legislation which encourages boards to explore a conversion from "time-based" assessments such as education and work experience hours to competency-based assessments. Platforms for competency-based assessments provide e-portfolios to simplify the process of certification, accreditation or competency testing for both the candidate as well as the assessor.¹⁵

Advancements within this MLO database are still being made that would allow communication with licensees or other operational improvements. The conversion to online renewals through MLO reportedly increased processing times due to its cumbersome design and newness. Meager staffing to support the database combined with an aging platform mean boards cannot easily pull data out of the database to inform regulations, policy, communications or workflows. The lack of advanced (or even more current) technology will ultimately increase the regulatory footprint by adding time and cost to OPLC, applicants, and licensees - all of which are presumably passed onto the consumer. Regulatory boards around the nation are already facing pressure to adopt evidence-informed regulation, considering upstream risk, disciplinary trends, practice profiles of individuals found to endanger consumers, and more. These are favorable developments for the regulatory field and yet rely heavily on the ability to track and analyze data. Without adequate technology, board hands will be tied to improve or modernize regulatory processes in the state.

¹⁵ Utah Code Ann. §58-1-301(5), accessed at <https://le.utah.gov/~2019/bills/static/HB0226.html>

OUT OF STATE APPLICANTS

Original applicants seeking a license in one of these fields in New Hampshire faces relatively average or lower barriers to entry when compared to other states.

The Board provides a specific application process for out-of-state applicants that hold a license in a state with similar eligibility requirements. Also called “substantial equivalency”, these clauses can prove burdensome for staff that must verify the equivalency of that originating state’s requirements, which could change yearly with legislative movements. Such clauses are also vague and do not provide the applicant with clear guidance on gaps in training or remedial alternatives. Does similar mean “equal or higher”? Is a discount provided to satisfy the similar benchmark such as 70 percent or 90 percent of New Hampshire requirements? Does this comparison apply only to education and training or also to other eligibility requirements?

For these reasons the benefits of holding a license in another state can be lost in the application process as state boards seek to independently and forensically verify eligibility. New Hampshire rules require an extensive state verification including proof of a high school diploma or GED, school transcripts and examination passage, all of which could be very old or with institutions that no longer exist. Further, license verifications from other states can take weeks which further slows the process. Since many boards have now moved to electronic databases, often a license and discipline can be verified using publicly available license verification websites. In fact, license verifications have become so cumbersome for state boards that many now refuse to issue individual letters, pointing inquiring employers and boards to the online database. Yet in New Hampshire Board rules still require a letter directly from the out-of-state board with 10 individual elements. This type of requirement is both burdensome on the applicant and out-of-state board and duplicative of information required elsewhere in the application. Bar 304.01 specifically requires:

- (d) *In order to verify licensure, each applicant shall request the state board in which the current license is held to complete a certificate of state licensure.*
- (e) *The certificate of state licensure shall include the following:*
 - (1) *The state of licensure and the name of the board or agency that issued the license;*
 - (2) *The name of the applicant;*
 - (3) *The name and address of the school or shop where the apprenticeship was completed;*
 - (4) *The applicant’s enrollment and completion date;*
 - (5) *The total number of hours completed;*
 - (6) *The year first license was issued;*
 - (7) *The expiration date of last held license;*
 - (8) *The exam date(s), language exam taken in, and scores;*
 - (9) *The signature, current date, and title of the person filling out the certificate of state licensure; and*
 - (10) *The state seal, if applicable.¹⁶*

The Board may consider opportunities to streamline the out-of-state process. A good starting point is already embodied in the expeditious policies in place for original applicants, including the use of a temporary work permit upon application.

Alternatively, some boards pursue regional reciprocity agreements with neighboring states. The burden of maintaining data on “substantial equivalence” for 50 states is high, but this is quickly reduced by considering formalized agreements with only a handful of neighboring states that are together members of a regional economy. A review of rules for out-of-state applicants with an eye towards streamlining extensive documentation requirements could also prove an elegant improvement to the process. Lastly, the Board could also undertake its own evidence-based policy initiative by evaluating complaint and disciplinary data for out-of-state applicants compared to the general licensee pool. Such data could prove useful to consider a cost-benefit analysis for such an intensive regulation verification process. Could regulations be relaxed to provide a lower level of verification through alternative pathways?

To this end, a comparative analysis to requirements across the nation follows for each license type. A reciprocity analysis is also provided for each license type assuming “substantial equivalence” can be interpreted to be 70 percent satisfaction of New

¹⁶ N.H. Code Admin Bar 304.01

Hampshire requirements. Comparative licensing data for Manicurists or Master Barbers was not evaluated given the relative infrequency of licensure in other states. See Appendix B for a list of license requirements by state.

BARBERS

The majority of states license barbers (as opposed to registration or certification). In order to become licensed, most states require completion of an education program and passage of an exam. Most states set a minimum grade completion and age for applicants. Apprenticeship programs offer an alternative path to licensure in many states which can substitute for a more traditional academic educational program.

New Hampshire's requirements to become a licensed barber align with the national average. Most states require 1,500 education hours while New Hampshire requires 800. This could be interpreted as favorable to New Hampshire to encourage portability into the state and still protect the public. In general, licensure requirements should be set to ensure applicants have the competence to practice safely. Licensing requirements may be raised or lowered given the number of complaints and other evidence of harm to consumers. New Hampshire's requirements demonstrate barbers may practice safely with 800 hours of education. However, as one of the states with the lowest requirement in the nation, it is likely that barbers trained and licensed in New Hampshire could have difficulty transferring to another state. Most would need to complete additional hours of education or training. More locally, the median training requirement for licensure in states that surround New Hampshire (Connecticut, Maine, Massachusetts, Rhode Island, New York and Vermont), is 1,000 hours. This means barbers trained and licensed in those states could easily transfer their license into New Hampshire. Barbers trained and licensed in New Hampshire would be deterred from leaving, likely finding it difficult to transfer to a surrounding state. Like many states, New Hampshire recognizes a qualified apprenticeship program as an alternative pathway to licensure.

BARBER EDUCATION HOURS	
Median	1500
Mean	1357
Min	800
Max	2100
New Hampshire	800

The Barber license in New Hampshire yields a high reciprocity rate for applicants seeking to transfer a license into the state.

Barber Academic Pathway:

All 50 states meet the 70% threshold for educational hours. In fact, New Hampshire requires the fewest educational hours in the nation at 800 hours. New Jersey requires the next lowest required hours at 900. This means it will be relatively easy for individuals transferring into New Hampshire to obtain a license but relatively difficult for New Hampshire licensees to transfer their license to another state.

Barber Apprenticeship Pathway:

26 of 30 states that allow for an apprenticeship or require an apprenticeship for licensure meet the 70% threshold. The following states offer an apprenticeship pathway or require completion of an apprenticeship for licensure, but do not meet the 70% threshold:

- Kentucky – 63%
- Louisiana – 43%
- Rhode Island – 53%
- Tennessee – 47%

This comparative analysis does not consider the type of exam, passing rate, minimum age or grade/degree accomplishment.

COSMETOLOGISTS

The majority of states license cosmetologists (as opposed to registration or certification). In order to become licensed, most states require completion of an education program and passage of an exam. Most states set a minimum grade completion and age for applicants. Apprenticeship programs offer an alternative path to licensure in many states which can substitute for a more traditional academic educational program.

New Hampshire's requirements to become a licensed cosmetologist comport to the average across the nation which requires 1,500 education hours and passage of an exam. This could be interpreted as beneficial to cosmetologists and public consumers in New Hampshire. While a licensure compact among states does not currently exist, more states are settling on 1,500 education hours and other similar requirements. The standardization of licensure requirements among states promotes portability and serves as a useful foundation for the development of a licensure compact. Like many states, New Hampshire recognizes a qualified apprenticeship program as an alternative pathway to licensure.

COSMETOLOGIST EDUCATION HOURS	
Median	1500
Mean	1521
Min	1000
Max	2100
New Hampshire	1500

The Cosmetologist license in New Hampshire yields a slightly lower reciprocity rate when compared to barbering and esthetics.

Cosmetology Academic Pathway:

47 of 50 states meet the 70% threshold for educational hours. If the threshold is lowered to 67%, then the remaining three states could be counted (FL, MA and NY).

Cosmetology Apprenticeship Pathway:

16 of 25 states that allow for an apprenticeship meet the 70% threshold. The following states offer an apprenticeship pathway but do not meet the 70% threshold:

- Arkansas – 67%
- Kansas – 50%
- Maryland – 67%
- Michigan – 64%
- North Carolina – 40%
- Pennsylvania – 67%
- Tennessee – 50%
- Vermont – 50%
- Washington – 67%

Note that if the threshold were lowered to 67%, then four additional states (AK, MD, PA, and WA) could be counted. This would yield an 80% reciprocal rate as opposed to 64%. This comparative analysis does not consider the type of exam, passing rate, minimum age or grade/degree accomplishment.

ESTHETICIANS

The majority of states license estheticians (as opposed to registration or certification). In order to become licensed, most states require completion of an education program and passage of an exam. Most states set a minimum grade completion and age

for applicants. Apprenticeship programs offer an alternative path to licensure in many states which can substitute for a more traditional academic educational program.

New Hampshire's requirements to become a licensed esthetician comport to the median across the nation which requires 600 education hours and passage of an exam. This could be interpreted as beneficial to estheticians and public consumers in New Hampshire. While a licensure compact among states does not currently exist, more states are settling on 600 education hours and other similar requirements. The standardization of licensure requirements among states promotes portability and serves as a useful foundation for the development of a licensure compact. While apprenticeship programs are less common among states for esthetician licensure (when compared to cosmetologists and barbers), New Hampshire recognizes a qualified apprenticeship program as an alternative pathway to licensure.

ESTHETICIAN EDUCATION HOURS	
Median	600
Mean	627
Min	260
Max	1100
New Hampshire	600

The Esthetician license in New Hampshire yields a high reciprocity rate for applicants seeking to transfer a license across state lines.

Esthetician Academic Pathway:

45 of 49 states that regulate estheticians meet the 70% threshold for educational hours. The following states do not meet the threshold:

- Arkansas - 50%
- Connecticut - no regulation
- Florida - 43%
- Massachusetts - 67%
- Michigan - 67%
- Pennsylvania - 50%
- Virginia - regulation recently passed, awaiting requirements

Note that if the threshold were lowered to 67%, then two additional states (MA and MI) could be counted. This would yield a 94% reciprocal rate as opposed to 90%.

Esthetician Apprenticeship Pathway:

15 of 21 states that allow for an apprenticeship meet the 70% threshold. The following states offer an apprenticeship pathway but do not meet the 70% threshold:

- Arkansas - 29%
- Michigan - 40%
- Nebraska - 50%
- Utah - 67%
- Vermont - 67%
- Washington - 67%

Note that if the threshold were lowered to 67%, then three additional states (UT, VT and WA) could be counted. This would yield an 85% reciprocal rate as opposed to 71%. Some states require an apprenticeship to obtain a license, meaning the apprenticeship is not an alternative pathway as it is in New Hampshire and other states. These states were still included in this analysis since the substance and form of experience is substantially similar. This comparative analysis does not consider the type of exam, passing rate, minimum age or grade/degree accomplishment.

LOW INCOME APPLICANTS

CLEAR's review of the treatment of low-income applicants considered policies such as reduced application fees, sliding scales, or fee waivers. Beyond licensing fees, entry requirements can be expensive for a given profession. Educational requirements can represent a significant barrier to low income applicants and traditional academic programs can entail steep student loans. Some states acknowledge experiential learning through apprenticeship or provide credit for years of experience towards satisfaction of educational requirements. These "earn and learn" policies can be particularly beneficial to low-income applicants. Importantly, attendees at OPLC stakeholder meetings in October and November 2020 identified additional barriers that were common complaints among students, including lack of transportation, expense of childcare and low earning potential (which in some circumstances could be influenced by Medicaid and Medicare reimbursement policies). These all point to the "total cost" of obtaining a license which is mostly directed by board regulations and above and beyond the license fee established by the board.

As described above, barbers and cosmetologists earn an average of \$14.79 hourly which can increase to nearly \$18.00 for more advanced credentialing or experience. New Hampshire Employment Security reports Manicurists, a smaller subset of the profession, earn an average of \$18.59 or up to \$21.06 for experienced individuals.

Barbers and cosmetologists can face a relatively high "total cost" of licensure given the sum total of licensing fees, tuition, and exam fees. Public stakeholders shared concern about the cost of a cosmetology program in the state which they report yields on average \$16,000 in student loans plus living and travel expenses. High school programs through existing public school systems may offer beneficial innovation in the field to help reduce costs while preparing students for a viable career in a high-growth sector.

The cost of licensure could be significantly reduced by taking advantage of the apprenticeship pathway, however the majority of applicants still utilize the academic pathway. An apprenticeship alternative diversifies pathways into the profession and provides "earn and learn" opportunities which are a major benefit to all potential applicants but are particularly pertinent when considering minority and low-income communities.

Rules for apprenticeships are quite prescriptive and could be confusing to an audience that does not have advanced regulatory expertise (such as a barber overseeing an apprentice). There are two types of apprenticeship: a "school" or "shop" apprenticeship (more specifically independent licensees that agree to train an apprentice). Rules for the two types of apprenticeship seem to converge and diverge with numerous standards depending on the hours and curriculum of the program. A licensee may have difficulty navigating through each circumstance to determine which best describes his/hers.

Rules this complicated benefit from an interpretive guide which the Board has provided on its website. The Board may also consider reviewing these rules in particular along with the operational procedures they create through a Lean process and consideration of the public benefit tied to each requirement.

Lastly, the rules require a shop apprenticeship instructor to submit a monthly record of attendance to the Board no later than the 15th day of the following month. This is not a requirement of schools where records are retained by the school and a final document demonstrating completion is retained for licensure purposes. The Board could consider the practice of the Pharmacy Board related to Registered Pharmacy Technicians in which records are kept by the supervisor and available upon request, or in this circumstance, could be provided upon completion of the apprenticeship and application to the Board. This would reduce burden on both the licensee and OPLC staff - especially if staff infrequently finds anything of concern in these monthly records. Note also shop apprenticeships are still subject to inspection twice yearly and that apprentices still must pass the same licensing exam to demonstrate competence in the practice. It would seem these measures could serve as an appropriate safeguard for consumer protection without the additional burden of monthly paperwork which purportedly requires nearly a full time OPLC employee to keep pace. OPLC staff have observed that some people use the apprenticeship to skirt licensing

requirements, essentially remaining an apprentice for years without ever pursuing a full license. To correct this loophole, the Board could consider modifying reporting to an annual requirement and/or enacting grounds for discipline if a current licensee overseeing an apprenticeship enables such fraudulent behavior.

Public stakeholders voiced support to see regulations accommodate more crossover from school to apprenticeship settings. They also voiced concern that shop apprenticeship supervisors are not required to meet the same requirements as school instructors. However, a move this direction could have a chilling effect on apprenticeships by raising barriers for supervisors to provide this valuable service. Additionally, because a shop supervisor can only oversee one or two apprentices at a time, the risk of harm would seem far less than a school instructor that oversees much larger class sizes and applicant volume.

OPLC staff reported anecdotal experience administering the shop apprenticeships. According to their insight, approximately 200 - 250 people are in a shop apprenticeship at one time. Shop apprentices seem to demonstrate a lower examination passage rate although the cause of this trend deserves exploration. One important consideration may constitute the language proficiency of the student. According to stakeholders, shop apprentices often do not speak English as a first language, however the exam is offered in multiple languages.

The apprenticeship process would seem to lend itself to further review to inform if regulations could be relaxed, harmonized or amended. For example, are more complaints received for shop apprentices than school apprentices? Does the monthly attendance report ever reveal concerning or suspicious behavior? What explains the lower passage rate of shop apprentices and could this be tied to language proficiency? How do these outcomes speak to the accessibility of the profession for minority and low-income communities? OPLC staff have observed numerous occasions where these reports showed the apprentice had not receive the required number of hours to be considered for licensure which prompts the opportunity for guidance, however statistics on such denials are not routinely logged or evaluated. As a first step, the Board could begin by collecting and tracking pertinent data to inform its regulatory review.

MILITARY SERVICE MEMBERS, VETERANS AND MILITARY SPOUSES

CLEAR's review of policies affecting military service members, veterans and military spouses relied heavily on statewide legislation codified in New Hampshire RSA 332-G:7 which requires each board within OPLC to accept military training and experience towards licensure and to expeditiously approve a military spouse for a license if that individual holds a license in a state with substantially similar requirements.

Apart from these benefits, other states have considered bridge programs, temporary supervision, publicly available crosswalks, improved communications or an ombudsman appointed to this population. Some states also adopt policies related to entry to practice or portability, but limit these benefits specifically for the military community rather than extending them to the general applicant population. Any policy which expedites licensing for all applicants will benefit the military community.

Beyond RSA 332-G:7, Board statute and rules do not further address military applicants. Both internal and external stakeholders reported very few applicants utilizing military experience. Since New Hampshire houses only one naval base and is not home to a significant military industry, it makes sense the military community in the state is quite small. For the residents that return to the state following military service, a license in the professional care industry may present a viable career. Military experience in the barbering and cosmetology fields is somewhat rare and therefore often handled on a case-by-case basis to determine if the applicant meets basic requirements to sit for the examination.

Military spouse policies and benefits are likely much more relevant for the field. Professional care professions are promoted as a career for spouses on military bases and often in demand regardless of where the spouse is transferred. An overall lack of coordination for licensing requirements across state lines particularly characterizes the barber, cosmetology and esthetic industries. The professions would very much benefit from the development of a compact. At the time of this report, no such compact was sufficiently developed to offer a viable pathway.

The CSG National Center for Interstate Compacts (NCIC) has partnered with the U.S. Department of Defense to support the development of new occupational licensure interstate compacts. These compacts will promote reciprocity and reduce the barriers to license portability, particularly for military spouses who face higher barriers to entry in state-licensed professions due to frequent relocation.

NCIC and the Department of Defense are seeking applications from professional associations, federations or associations of state licensing boards, a coalition of state licensing boards, or national credentialing bodies for professions that are licensed in at least 30 states. Additional information about this technical assistance can be found at <https://compacts.csg.org/>.

Military spouses looking to transfer a license to New Hampshire must comply with the same process for other out-of-state applicants. As described above, this process can be riddled with requirements to prove the applicant has met basic eligibility criteria despite substantial experience and a license in other states. In fact, license verifications are a major contributor to delays and military spouses, more than other applicants, are likely to hold licenses in multiple states, exponentially increasing to administrative burden, time and cost for transferring a license to New Hampshire. Often these license verifications require a small fee for each state which adds to the spouse's total investment for the application even though these fees are not imposed directly by the New Hampshire board.

Given military service members and spouses are such a small pool of applicants to the Board, policies to expedite the application process could prove beneficial to this special population without major risk of consumer harm. In fact, such expeditious and exemptive policies have been passed in several states for the military community and serve as the foundation for broader "universal" licensure policies such as that in Arizona.¹⁷ The ultimate goal of these policies, regardless of the shape they take, is to help the military spouse get to work as quickly as possible, not necessarily to entirely bypass the licensing process. Consider for example policies that:

- Provide a temporary work permit to the military spouse applicant while other application elements (such as transcripts, license verifications, etc.) are pending submission.
- Provide a license upon proof of completion of a national examination.
- Allow military spouses to work without a license for up to a year while he/she prepares application materials.
- Accept verification of a license in another state through publicly available online license look-ups rather than requiring a letter from the out-of-state board with the elements listed in Bar 304.01.
- Waive application fees for military service members, veterans and spouses.

JUSTICE-INVOLVED APPLICANTS (WITH CRIMINAL CONVICTIONS)

Regulatory boards in New Hampshire are prescribed authority and responsibilities through state law. Most requirements are outlined in the profession's practice act, the accumulation of state laws related to the board and profession. RSA Chapter 310-A creates the Office of Professional Licensure and Certification which is given certain authorities to administer regulatory boards. All boards are also subject to RSA Chapter 332-G regarding the General Administration of Regulatory Boards and Commissions. It is this section of state law that outlines requirements of boards related to criminal convictions.

New Hampshire RSA 332-G:10 prevents boards from disqualifying a person from licensure simply for having been convicted of a crime and without consideration of the nature of the crime, relationship to the profession and the rehabilitation of the applicant. It states:

*No board or commission shall disqualify a person from practicing, pursuing, or engaging in any occupation, trade, vocation, profession, or business for which a license, permit, certificate, or registration is required under this title, nor suspend or revoke such license, certificate, or registration because of a prior conviction of a crime in and of itself. However, a board or commission may deny a license or certificate, or the renewal of a license or certificate, or may suspend or revoke such license or certificate, because of a prior conviction after considering the nature of the crime and whether there is a substantial and direct relationship to the occupation, trade, vocation, or profession for which the person has applied, and may consider information about the rehabilitation of the convicted person, and the amount of time that has passed since the conviction or release.*¹⁸

¹⁷ Office of Governor Doug Ducey. (n.d.). Universal License Recognition. Retrieved February 23, 2021, from https://azgovernor.gov/sites/default/files/universallicensure_recognition1_0.pdf

¹⁸ NH RSA 332-G:10

Recent legislation codified in New Hampshire RSA 332-G:13 limits consideration of a criminal record in licensing decisions and codifies:

- Procedures by which the applicant can petition for predetermination;
- Standards for disqualification based on a conviction;
- Procedures for determination and appeal; and,
- Annual reporting and publication requirements for OPLC.

While boards are required to comply with the requirements set forth in Chapter 332-G, there are at times conflicts with the Practice Act and Board rules. For example, when legislation changes a state law applying to all boards, it can take some time for boards to adopt these new provisions into rules such is the case with RSA 332-G:13. For this analysis, CLEAR’s review primarily considered the practice act and board rules. OPLC is currently working to harmonize statutory conflicts. CLEAR’s review also considered provisions related to blanket bans, identification of crimes related to practice, the use of morality clauses, strategies for consistent decision making and evidence informed policy.

The Board of Barbering, Cosmetology and Esthetics has ample statutory authority to define qualifications of applicants which includes satisfactory evidence of “good professional character”.¹⁹ The Board is required to establish review criteria of the applicant’s “good professional character” which it has done in Bar 301.02(d) citing:

- (1) *Whether the person has been found guilty of abuse, neglect, exploitation of any person or has been convicted of child endangerment, fraud or a felony against a person in this or any other state by a court of law;*
- (2) *Whether the person has a current mental condition affecting the ability to practice the profession;*
- (3) *The length of time that has passed since the crime or disciplinary action;*
- (4) *Information showing the positive answer is not indicative of the persons current character; and*
- (5) *Any relevant circumstances surrounding the affirmative answer.*²⁰

Rules go on to specify apprentice applicants must report conviction of a felony or misdemeanor, stating:

- (5) *Whether the applicant:*
 - a. *Has been convicted of a felony or misdemeanor, other than a traffic violation, which has not been annulled by a court, and, if yes, the applicant shall submit:*
 - (i) *A Court provided copy of the charge(s), conviction(s), penalties imposed, and a statement created by the applicant relative to the charges;*
 - (ii) *If the applicant is currently on probation, the probation officer’s name, mailing address, and telephone number, a letter from the probation officer stating that the applicant is in compliance, and;*
 - (iii) *If the applicant has completed probation or parole, a letter indicating that the applicant met all the requirements and is no longer on parole or probation*²¹

Further, rule provides the process of denying an application, requiring the board to provide the applicant with a letter containing the following:

- (1) *Referencing the statute or rule the applicant has not complied with;*
- (2) *Explaining what the applicant shall do in order to become registered or licensed; and*
- (3) *Providing the secretary’s name and telephone number for further assistance.*²²

Statute does not address criminal convictions or background checks. As noted above, rules address the reporting of a criminal conviction but do not specify a requirement that an applicant undergo a criminal background check even though one is required as part of the application process.

Taken together, the architecture of regulations and processes concerning applicants with criminal convictions boasts alignment to emerging practices in the licensing field as well as opportunities for further consideration of standout innovations.

¹⁹ NH RSA 313-A:8, II, b

²⁰ N.H. Code Admin Bar 301.02, d

²¹ N.H. Code Admin Bar 301.01, b, 5

²² N.H. Code Admin Bar 301.02, g

Publicly identify review criteria for convictions:

The Board has done this in Bar 301.02(d) which provides transparency to potential applicants. However, the criteria are still vague and provides ample decision-making authority to the Board, even if anecdotal evidence suggests the Board generally approves applicants with convictions. One public stakeholder questioned if such regulations have a chilling effect returning citizens that would otherwise consider a career in the industry. The Utah Division of Occupational and Professional Licensure (DOPL) published an entire webpage on criminal history guidelines. The webpage lets applicants know what they can expect from the application process. Criminal history guidelines are readily available throughout DOPL's website with a primary overview page addressing Division-wide information and as a menu bar option for each individual profession. See https://dopl.utah.gov/criminal_history.html

Identify crimes related to practice: More public stakeholders and policymakers are calling on licensing boards to consider the hard work identifying crimes related to practice.²³ The Board has established in Bar 301.02(d) criteria for reviewing convictions. This rule clarifies the Board will consider convictions of “abuse, neglect, exploitation of any person or has been convicted of child endangerment, fraud or a felony against a person in this or any other state by a court of law.”

However, the Board's application process requires applicants to report any conviction. Stakeholders further reported that the Board in practice considers convictions related to drugs, domestic violence and theft, a slightly different list than the one provided in rule.

The Board may consider tethering these rules (Bar 301.02 (g) and Bar 301.01(b)(5)) to each other, refining the application criteria to only report convictions named in Bar 301.02(g).

The New Hampshire Board of Pharmacy statute does just this and specifically requires the reporting of crimes only related to practice; for that profession the Board considers only drug and pharmacy related crimes. As another alternative, the Board may consider the approach of Utah's DOPL which has issued guidelines for every profession that identify crimes related to practice. A decision matrix specific to the Barber and Cosmetology professions can be found at <https://dopl.utah.gov/cosmo/> and clearly communicates how each offense will be treated, from licensure approval, review of the conviction to an interview with the applicant.

Elimination of morality clauses: Morality clauses such as “good professional character” which is used broadly in the Barber, Cosmetology and Esthetic statutes and rules, are vague and provide sweeping authority to deny based on a variety of interpretations. Substitution of these clauses or further definition of them, as seen in New Hampshire Board of Pharmacy, can curtail denials for irrelevant criminal histories and may ease a perceived chilling effect among returning citizens.²⁴

Elimination of consideration or denials based on charges: Board rules require applicants to report convictions of a felony or misdemeanor. If the applicant discloses a conviction, they must also then provide copies of charges and penalties imposed, not just documentation of the conviction. This rule demonstrates potential confusion regarding criminal proceedings. Charges may not result in a conviction. An individual could be found innocent of those charges, but a Board member could misunderstand a criminal record or view the existence of a charge as a lack of “good moral character” and impose licensing sanctions despite the Court's conclusion. This practice is contrary to the processes of the criminal justice system and one of its most sacred principles to consider a defendant innocent until proven guilty. Such a practice also risks adding to an already long list of collateral consequences outside the tenets of the justice system.

Data collection for evidence-informed policy: The Board may consider reviewing its own data concerning applications denied and approved with a conviction as well as disciplinary frequency for licensees with convictions. This data could provide insight to the Board and could lead to regulations that are responsive to specific areas of public risk.

Petition for Predetermination: RSA 332-G:13 already establishes a method by which applicants may petition the Board for predetermination and establishes expectations of the Board when denying a license based on a conviction. The Barber,

²³ The Evolving State of Occupational Licensing: Research, State Policies and Trends (2nd ed., p. 17, Rep.). (2019). Denver, CO: National Conference of State Legislatures. doi:https://www.ncsl.org/Portals/1/Documents/employ/Occu-Licensing-2nd-Edition_v02_web.pdf

²⁴ Dick M. Carpenter et al., License to Work: A National Study of Burdens from Occupational Licensing, 2nd edition (Arlington, VA.: Institute for Justice, 2017), https://ij.org/wp-content/themes/ijorg/images/tw2/ License_to_Work_2nd_Edition.pdf,

Cosmetology and Esthetic Board also clarifies in rule these denial proceedings therefore aligning to this statutory requirement and promising practice observed in the occupational licensing field.

Elimination of Blanket Bans: The Board does not provide blanket bans, allowing instead discretion to consider the subjective information related to a conviction.

Consistent Decision Making: A case-by-case review of criminal histories can lead to inconsistency in decision making both among individual Board members and over time as there is member and staff turnover. Decision making matrices or other governance policies can be helpful to boards to ensure fair and consistent treatment of all applicants. They also help to notify the public of the board's thinking on the topic and/or treatment of a conviction.

Expungement of discipline or license conditions emanating from a conviction: Licensing boards are not tied to a binary decision to either approve or deny an application based on a conviction. Often they may also take intermediate or rehabilitative measures, providing a license with conditions such as supervision, completion of probation/parole, or probationary terms such safe practice free of discipline for a defined timeframe. These practices are often used for individuals with convictions. Unfortunately, they are also public which is often a statutory requirement the board cannot waive. Such a disciplinary record, although intended to be rehabilitative, can be a scarlet letter on a licensee's record and employment prospects. Authority to expunge such disciplinary records upon satisfaction of the terms helps to reduce collateral consequences for conviction.

Occupational training programs in state jails and prisons: The Board has exclusive authority in the State of New Hampshire to license training programs and schools related to the profession. The Board recently authorized a new training program in the New Hampshire Correctional Facility for Women (NHCFW). As noted elsewhere in this report, individuals with criminal convictions can face dire job prospects and tend to be an underemployed and underutilized population in the workforce. The Board's approval of the program at NHCFW is a demonstration of its progressive and thoughtful regulatory philosophy. Consideration of the above policy levers may help to streamline the application process for this new wave of students, helping them to get to work quickly upon transition to the community.

STANDOUT INNOVATIONS TO SHARE

Alignment to National Standards: The Board of Barbering, Cosmetology, and Esthetics has kept licensing requirements within industry standards without imposing requirements that are higher or lower than most other states.

Temporary Permits: The Board issues a temporary permit to applicants that have completed all licensure requirements and are only waiting to pass the final examination, an effective regulatory tool that provides the board oversight of the applicant to protect the consumer, while allowing that applicant to immediately begin work as they engage the licensing process.²⁵ The success of the program is evident in the experience of one OPLC staff member who reported never having witnessed a disciplinary case against a temporary licensee in her 11 years of experience.²⁶

Petition Pathway: The Board features an exemption process which allows applicants to petition the Board if they do not meet certain qualifications, providing a potential alternative pathway to licensure.

Processing Times Set Rule/Statute: Board rules require the approval or denial of an application with 30 days of receipt, a policy to which more states have turned to provide both transparency and accountability in the licensing process.

Gradations of Licensure: The gradations of licensure observed within the Board provide a legitimate pathway into a profession and encourage other workforce infrastructure that benefits the state's residents and economy.²⁷ It is notable that the low barriers and gradation of licensure also benefit other special populations in addition to the general public. These policies are especially helpful given the minimum age to enter the profession is 16, providing young people with industry experience that does not rely on a college education.

²⁵ NH RSA 313-A:18

²⁶ Ms. Kathryn Wantuck, Board Administrator, Barber, Cosmetology and Esthetics Board [Personal interview]. (March 20, 2019).

²⁷ Redbird, B. (2017). The New Closed Shop? The Economic and Structural Effects of Occupational Licensure. *American Sociological Review*, 82(3), 600-624. doi:10.1177/0003122417706463

Training in Correctional Facility: The Board’s approval of the cosmetology training program at New Hampshire Correctional Facility for Women (NHCFW) is a demonstration of its progressive and thoughtful regulatory philosophy providing a viable career path to returning citizens that could help reduce recidivism.

Absence of Blanket Bans: The Board does not institute blanket bans for criminal convictions, allowing instead discretion to consider the subjective information related to a conviction.

STANDOUT INNOVATIONS TO CONSIDER

Communication Tools to Improve Transparency: Boards can undertake additional practices to help applicants understand the licensure process, considering for example:

- The College of Physiotherapists of Ontario published a video series on YouTube, “Understanding the Regulated Health Professions Act”, to help applicants and licensees understand industry regulations. See: <https://www.youtube.com/watch?v=kloI9ipYDDo>.
- The Ontario College of Dietitians maintains a YouTube site with multiple videos breaking down ethics and continuing competency requirements among others. See: <https://www.youtube.com/user/CollegeofDietitians>.
- The North Carolina Addiction Specialist Professional Practice Board publishes a brochure for the profession, providing a synopsis of the profession, outlining the scope of practice and detailing the licensure process. See: <https://www.ncsappb.org/wp-content/uploads/2018/05/Combined-CSAPC.pdf>
- Lean process improvement that engages board members and OPLC staff to collectively map the operational effects and potential savings created by regulations and consider more permissive rules that allow operational flexibility while preserving consumer protections.
- Utah legislation which encourages boards to explore a conversion from “time-based” assessments such as education and work experience hours to competency-based assessments. Platforms for competency-based assessments provide e-portfolios to simplify the process of certification, accreditation or competency testing for both the candidate as well as the assessor.²⁸

Improved Technology: Consider upgrading or improving the existing MLO database to provide a sharp tool to the Board for adopting evidence-based policy and streamlining workflows.

Streamline Process for Out of State Applicants: The Board may consider opportunities to streamline the out-of-state process. A good starting point is already embodied in the expeditious policies in place for original applicants, including the use of a temporary work permit upon application. Alternatively, some boards pursue regional reciprocity agreements with neighboring states. The burden of maintaining data on “substantial equivalence” for 50 states is high, but this is quickly reduced by considering formalized agreements with only a handful of neighboring states that are together members of a regional economy. A review of rules for out-of-state applicants with an eye towards streamlining extensive documentation requirements could also prove an elegant improvement to the process. Lastly, the Board could also undertake its own evidence-based policy initiative by evaluating complaint and disciplinary data for out-of-state applicants compared to the general licensee pool. Such data could prove useful to consider a cost-benefit analysis for such an intensive regulation verification process. Could regulations be relaxed to provide a lower level of verification through alternative pathways?

Apprenticeship Reporting: Review the apprenticeship process to determine if regulations could be relaxed, harmonized or amended. For example, are more complaints received for shop apprentices than school apprentices? Does the monthly attendance report ever reveal concerning or suspicious behavior? What explains the lower passage rate of shop apprentices and could this be tied to language proficiency? How do these outcomes speak to the accessibility of the profession for minority and low-income communities?

Military and Military Spouse Policies: Consider policies to expedite the application process for military service members, veterans and military spouses. Consider for example policies that:

- Provide a temporary work permit to the military spouse applicant while other application elements (such as transcripts, license verifications, etc.) are pending submission.

²⁸ Utah Code Ann. §58-1-301(5), accessed at <https://le.utah.gov/~2019/bills/static/HB0226.html>

- Provide a license upon proof of completion of a national examination.
- Allow military spouses to work without a license for up to a year while he/she prepares application materials.
- Accept verification of a license in another state through publicly available online license look-ups rather than requiring a letter from the out-of-state board with the elements listed in Bar 304.01.
- Waive application fees for military service members, veterans and spouses.

Transparency for Justice Involved Applicants: Consider next-step policies to provide greater transparency and access to the profession for aspirants and applicants with criminal convictions. Consider for example:

- A webpage that conveys criminal history guidelines similar to that published by the Utah Division of Occupational and Professional Licensure (DOPL) at https://dopl.utah.gov/criminal_history.html
- Identify crimes related to practice, considering:
 - *Tethering Bar 301.02 (g) and Bar 301.01(b)(5) to each other, refining the application criteria to only report convictions named in Bar 301.02(g).*
 - *Adopting a decision matrix similar to Utah’s DOPL matrix specific to the Barber and Cosmetology professions, found at <https://dopl.utah.gov/cosmo/>. Decision making matrices or other governance policies can be helpful to boards to ensure fair and consistent treatment of all applicants. They also help to notify the public of the board’s thinking on the topic and/or treatment of a conviction.*
 - *Substitute or further define morality clauses to curtail denials for irrelevant criminal histories and reduce a potential chilling effect among returning citizens.*
- Eliminate the collection and consideration of information related to criminal charges.
- Consider reviewing data concerning applications denied and approved with a conviction as well as disciplinary frequency for licensees with convictions. This data could provide insight to the Board and could lead to regulations that are responsive to specific areas of public risk.
- Consider legislation that would allow the Board to expunge a disciplinary record emanating from a conviction upon satisfaction of the terms to help reduce collateral consequences for conviction.

APPENDIX

Barbering, Cosmetology and Esthetician Comparative Licensing Data and Reciprocity Analysis

Barbering

A barber provides beautification treatments by shaving and trimming beards, cutting hair and other related services. In New Hampshire, a barber shaves and trims beards, cuts hair, gives facials or scalp massages, and shampoos, arranges, dresses and styles hair.

The majority of states license barbers (as opposed to registration or certification). In order to become licensed, most states require completion of an education program and passage of an exam. Most states set a minimum grade completion and age for applicants. Apprenticeship programs offer an alternative path to licensure in many states which can substitute for a more traditional academic educational program.

New Hampshire's requirements to become a licensed barber align with the national average. Most states require 1,500 education hours while New Hampshire requires 800. This could be interpreted as favorable to New Hampshire to encourage portability into the state and still protect the public. In general, licensure requirements should be set to ensure applicants have the competence to practice safely. Licensing requirements may be raised or lowered given the number of complaints and other evidence of harm to consumers. New Hampshire's requirements demonstrate barbers may practice safely with 800 hours of education. However, as one of the states with the lowest requirement in the nation, it is likely that barbers trained and licensed in New Hampshire could have difficulty transferring to another state. Most would need to complete additional hours of education or training. More locally, the median training requirement for licensure in states that surround New Hampshire (Connecticut, Maine, Massachusetts, Rhode Island, New York and Vermont), is 1,000 hours. This means barbers trained and licensed in those states could easily transfer their license into New Hampshire. Barbers trained and licensed in New Hampshire would be deterred from leaving, likely finding it difficult to transfer to a surrounding state. Like many states, New Hampshire recognizes a qualified apprenticeship program as an alternative pathway to licensure.

Barber Education Hours

Median	1500
Mean	1357
Min	800
Max	2100
New Hampshire	800

STATE	EDUCATION REQUIREMENTS	APPRENTICESHIP OPTION IN LIEU OF EDUCATION REQUIREMENT	EXAMINATION REQUIREMENT	PASSING RATE	MIN. AGE	MIN. GRADE
AL	1000	2000 hrs apprenticeship completed within 2 yrs	theory and practice - 70% passing score	70	16	10
AK	1650	2000 hrs apprenticeship completed within 2 yrs	written and practical - 75 points passing score	75		
AZ	1500	No	written and practical demonstration		16	10
AR	1500	No	practical demonstration, written and oral (75% passing)	75	16.5	10
CA	1500	3200 hrs, with 39 hrs of pre-apprenticeship training and 216 hrs classroom training	practical demonstration and written test		17	10
CO	1500	No	written exam		16	
CT	1000	apprenticeship approved by Labor Dept	examination			8
DE	1500	3000 hrs	theory and practical exams with 75 passing	75	16	10
FL	1200	No	examination		16	
GA	1500	3000 hrs for a minimum of 18 months for master barber; 2280 hrs for a minimum of 14 months for barber II	written and practical exam with 70% passing score	70	16	HS/GED
HI	1500	1500 hrs within 12 months max	exam with 75% passing score	75	17	
ID	900	No	written and practical demonstration exam		16.5	10
IL	1500	No	written exam on theory and practical knowledge		16	HS

STATE	EDUCATION REQUIREMENTS	APPRENTICESHIP OPTION IN LIEU OF EDUCATION REQUIREMENT	EXAMINATION REQUIREMENT	PASSING RATE	MIN. AGE	MIN. GRADE
1500	No	written and practical exam with 75% passing score	75	18		
2100	No	NIC theory and practical exams with 70% passing score	70		10	
1200	No	NIC National Barber Styling Theory Examination; and KS jurisprudence exam		16	HS/GED	
KY	1500		Probationary Barber exam; then barber exam with a written exam and practical demonstration on living model with a 75% passing score	75	17.5	HS/GED
LA	1500	400 practical hrs and 288 theory hrs completed in 2 yrs; \$500 registration fee	practical demonstration and written portion		17	HS
ME	1500	2500 hrs over at least 18 months	written and practical exam		17	10
MD	1200	2250 hrs within 2 yrs	theory and practical exam			
MA	1000	required: 18 months apprenticeship outside of a school	written and practical exam		16	
MI	1800	No	theory and practical exam with 75% passing score	75	17	10
MN	1500	No	1 written, 1 oral, 4 practical passed with 55 or higher	55		10
MS	1500	No	practical demonstration and written and oral test			HS
MO	1000	2000 hrs within 5 yrs with at least 1 hr lecture/demonstration each business day	practical and theoretical exam with 75% passing score	75	17	
MT	1100	No	NIC written and practical exam with 75% passing score	75	18	HS/GED
NE	2100	No	written and practical exam		17	HS/GED
NV	1500	1500 hrs and must complete 12th grade	written and practical exam		18	10
NH	800	1600 hrs of apprenticeship over 12 months	examination		16	HS/GED
NJ	900	No	written and practical exam with 75% passing score	75	17	HS/GED
NM	1200	1200 hrs within 36 months	practical, written theory and jurisprudence with 75% passing score	75	17	10
NY	1000	2 yrs	practical exam		17	
NC	1528		NIC clinical exam			
ND	1550		70% passing required for apprentice; 75% passing for barber	75	17	HS
OH	1800	No	written and practical exam with 75% passing score	75	18	8
OK	1500	3000 hrs	written and practical exam		16	8
OR	1350	No	written and jurisprudence exam with 75% passing	75		
PA	1250	1250 hrs in not less than 9 months	theory exam and practical exam		16	8
RI	1500		NIC written and practical exam with 70% passing score	70	18	HS
SC	1500	1920 hrs over 12 months	written and practical exam		17	9
SD	1500	No	written and practical exam with 75% passing score	75	18	
TN	1500	750 classroom hrs then complete apprenticeship	written theory and practical exams		17	12
TX	1500	No	written and practical exam		16	7
UT	1000	1250 hrs in not less than 9 months	NIC theory and practical exams with 75% passing score	75		
VT	1000	2000-3000 hrs in 12-36 months	practical, written, and jurisprudence exam		18	HS/GED
VA	1500	3000 hrs	written and practical exam			
WA	1000	1200 hrs	written and performance exam with 75% passing score	75	17	
WV	1200	2400 hrs within 30 months, pass each chapter review exam with 70%	examination		18	HS/GED
WI	1000	2000 hrs (1712 hrs practical and 288 theory instruction) within 4 yrs or less	written and practical exam		18	HS/GED
WY	1000	No	theory and practical exam with 75% passing score	75	17	10

Source: Information received from Professional Beauty Association and supplemented by review of board applications, statutes and regulations Barber

Barbering Reciprocity Analysis

Academic Pathway:

All 50 states meet the 70% threshold for educational hours. In fact, New Hampshire requires the fewest educational hours in the nation at 800 hours. New Jersey requires the next lowest required hours at 900. This means it will be relatively easy for individuals transferring into New Hampshire to obtain a license but relatively difficult for New Hampshire licensees to transfer their license to another state.

Apprenticeship Pathway:

26 of 30 states that allow for an apprenticeship or require an apprenticeship for licensure meet the 70% threshold. The following states offer an apprenticeship pathway or require completion of an apprenticeship for licensure, but do not meet the 70% threshold:

KY - 63%

LA - 43%

RI - 53%

TN - 47%

This comparative analysis does not consider the type of exam, passing rate, minimum age or grade/degree accomplishment.

Cosmetology

A cosmetologist provides beautification treatments to the hair, skin and nails. In New Hampshire, a cosmetologist arranges, dresses, curls, waves, cleanses, cuts, bleaches, colors, or similarly treats the hair of any person, and performs other work customarily performed by a cosmetologist such as giving facials, manicures, pedicures, and artificial nail enhancements, applying makeup or eyelashes to any person, and removing superfluous hair.

The majority of states license cosmetologists (as opposed to registration or certification). In order to become licensed, most states require completion of an education program and passage of an exam. Most states set a minimum grade completion and age for applicants. Apprenticeship programs offer an alternative path to licensure in many states which can substitute for a more traditional academic educational program.

New Hampshire's requirements to become a licensed cosmetologist comport to the average across the nation which requires 1,500 education hours and passage of an exam. This could be interpreted as beneficial to cosmetologists and public consumers in New Hampshire. While a licensure compact among states does not currently exist, more states are settling on 1,500 education hours and other similar requirements. The standardization of licensure requirements among states promotes portability and serves as a useful foundation for the development of a licensure compact. Like many states, New Hampshire recognizes a qualified apprenticeship program as an alternative pathway to licensure.

Cosmetology Education Hours

Median	1500
Mean	1521
Min	1000
Max	2100
New Hampshire	1500

STATE	EDUCATION REQUIREMENTS	APPRENTICESHIP OPTION IN LIEU OF EDUCATION REQUIREMENT	EXAMINATION REQUIREMENT	PASSING RATE	MIN. AGE	MIN. GRADE
AL	1500	3000 hrs apprenticeship	theory and practical - 70% passing score	70	16	10
AK	1650	2000 hrs apprenticeship completed within 1-2 yrs	written and practical - 75 points passing	75		
AZ	1600	No	written and practical		16	10
AR	1200	No	written (70% passing) and practical (75% passing)	70 written and 75 practical	16	10
CA	1600	3200 hrs apprenticeship, with 39 hrs of pre-apprenticeship training and 220 hrs classroom training	practical demonstration and written test		17	10

STATE	EDUCATION REQUIREMENTS	APPRENTICESHIP OPTION IN LIEU OF EDUCATION REQUIREMENT	EXAMINATION REQUIREMENT	PASSING RATE	MIN. AGE	MIN. GRADE
CO	1500	No	written exam		16	
CT	1500	No	written exam			9
DE	1500	3000 hr			16	10
	2100	merged education/apprenticeship option with 600 hrs classroom and 1500 hrs apprenticeship	theory and practical exams with 75 passing score	75		
FL	1000	No	examination		16	12
GA	1500	3000 hrs within at least 18 months	written and practical exams with 70% passing score	70	17	12/GED
HI	1800	3600 hrs within 42 months max	written and practical exams with 75% passing score	75	16	12
ID	1600	3200	National Interstate Council of State Boards of Cosmetology (NIC) theory and practical exams		16.5	10
IL	1500	No, but schools offer internship program that can count for up to 150 of the 1500 education hrs	written exam on theory and practical knowledge		16	12
IN	1500	No	written and practical exam with 75% passing score	75	18	10
IA	2100	No	national exam with 75% passing score	75		12
KS	1500		written and practical exam with 75% passing score	75	17	12
KY	1500		written and practical exam		16	12
LA	1500	No	written and practical exam		16	10
ME	1500	2500 hrs over at least 18 months	written and practical exam		17	10
MD	1500	24 months of training with 20 hrs per week; mail monthly reports to Board	theory and practical exam		17	9
MA	1000		practical with 80% passing and written exam with 75% passing	75		
MI	1500	2 yrs including an average of 80 hrs of instruction per month; monthly attendance reports to Board; examination every 6 months	theory and practical exam with 75% passing score	75	17	9
MN	1550	No	general theory test, written practical test, jurisprudence exam			12
MS	1500	No	exam with 70% passing score	70	17	12
MO	1500	3000 hrs within 5 yrs, including at least 1 hr of lectures/demonstrations each business day	written and practical exam with 75% passing score	75	17	10
MT	1500	No	NIC written and practical exam with 75% passing score	75	18	12/GED
NE	2100	2100 hrs and 2000 credits	written or practical exam with 75% passing score	75	17	12/GED
NV	1600	3600 hrs (apprenticeship program only available if nearest licensed school is more than 60 miles away from residence)	written, practical and jurisprudence exam		18	10
NH	1500	3000 hrs apprenticeship program over 18 months (must be 16 yrs old and deemed by the board to be of good professional character)	written and practical exam			12/GED
NJ	1200	No	written and practical exam with 75% passing score	75		12/GED
NM	1600	No	practical, written theory and jurisprudence with 75% passing score	75	17	10
NY	1000	No	written and practical exam with 70% passing score	70	17	
NC	1500	1200 hrs over 6 months or more	NIC written and practical exam with 75% (70% for apprentices) passing score	75		
ND	1800	No	NIC written exam, ND state practical, jurisprudence exam			12/GED
OH	1500	No	practical demonstration and written exam		16	10
OK	1500	3000 hrs	written and practical exam		16	8
OR	1450	No	written exam and jurisprudence exam with 75% passing score	75		
PA	1250	2000 hrs	written exam		16	10
RI	1200	No	NIC written and practical exam with 70% passing score	70	18	12/GED

STATE	EDUCATION REQUIREMENTS	APPRENTICESHIP OPTION IN LIEU OF EDUCATION REQUIREMENT	EXAMINATION REQUIREMENT	PASSING RATE	MIN. AGE	MIN. GRADE
SC	1500	No	NIC written and practical exam		16	10
SD	1500	2150 hrs	NIC written and practical and state jurisprudence exam		18	12/GED
TN	1500	750 classroom hrs then complete an apprenticeship	written theory and practical exams with 70% passing score	70	16	
TX	1500	No	written and practical exam with 70% passing score	70	17	12/GED
UT	1600	2500 hrs in not less than 15 months	NIC theory and practical exams with 75% passing score	75	n/a	
VT	1500	2000-3000 hrs within 12-36 months	written and practical exam		18	12/GED
VA	1500	3000 hrs	written and practical exam			
WA	1600	2000 hrs	written and performance exams with a 75% passing score	75	17	
WV	1800	No	examination		18	12/GED
WI	1550	3000 hrs (3712 hrs practical training and 288 hrs theoretical instruction) within 2-4 yrs	written and practical exam		18	12/GED
WY	1600	No	theory and practical exam passed with in 1 year		16	10

Source: Information received from Professional Beauty Association and supplemented by review of board applications, statutes and regulations

Cosmetology Reciprocity Analysis

Academic Pathway:

47 of 50 states meet the 70% threshold for educational hours. If the threshold is lowered to 67%, then the remaining three states could be counted (FL, MA and NY).

Apprenticeship Pathway:

16 of 25 states that allow for an apprenticeship meet the 70% threshold. The following states offer an apprenticeship pathway but do not meet the 70% threshold:

- AK – 67%
- KS – 50%
- MD – 67%
- MI – 64%
- NC – 40%
- PA – 67%
- TN – 50%
- VT – 50%
- WA 67%

Note that if the threshold were lowered to 67%, then four additional states (AK, MD, PA, and WA) could be counted. This would yield an 80% reciprocal rate as opposed to 64%.

This comparative analysis does not consider the type of exam, passing rate, minimum age or grade/degree accomplishment.

Esthetician

An esthetician provides beautification treatments to skin through cosmetic treatments and services such as facials, hair removal, and makeup application.

In New Hampshire, an esthetician gives facials, applies makeup, gives therapeutic skin care treatments, removes superfluous hair, applies eyelashes, beautifies the face, neck, arms and shoulders, massages, cleanses or stimulates the skin in these areas and provides manicure and pedicure services to hands and feet.

The majority of states license estheticians (as opposed to registration or certification). In order to become licensed, most states require completion of an education program and passage of an exam. Most states set a minimum grade completion and age for applicants. Apprenticeship programs offer an alternative path to licensure in many states which can substitute for a more traditional academic educational program.

New Hampshire's requirements to become a licensed esthetician comport to the median across the nation which requires 600 education hours and passage of an exam. This could be interpreted as beneficial to estheticians and public consumers in New Hampshire. While a licensure compact among states does not currently exist, more states are settling on 600 education hours and other similar requirements. The standardization of licensure requirements among states promotes portability and serves as a useful foundation for the development of a licensure compact. While apprenticeship programs are less common among states for esthetician licensure (when compared to cosmetologists and barbers), New Hampshire recognizes a qualified apprenticeship program as an alternative pathway to licensure.

Esthetician Education Hours

Median	600
Mean	627
Min	260
Max	1100
New Hampshire	600

STATE	TYPE OF REGULATION	EDUCATION REQUIREMENTS	APPRENTICESHIP OPTION IN LIEU OF EDUCATION REQUIREMENT	EXAMINATION REQUIREMENT	PASSING RATE	MIN. AGE	MIN. GRADE
AL	licensure	1000	2000 hrs completed within 3 yrs	theory and practical - 70% passing score	70	16	10
AK	licensure	350	350 hrs	written and practical with 75 point passing score	75		
AZ	licensure	600	No	written and practical		18	
AR	licensure	480	No	written (70% passing) and practical (75% passing)	70 written, 75 practical	16	10
CA	licensure	600	3200 hrs, with 39 hrs of pre-apprenticeship training and 220 hrs classroom training option	practical demonstration and written test		17	10
CO	licensure	600	No	written exam		16	
CT	n/a		n/a	n/a			
DE	licensure	600	1200 hrs	theory and practical exams with 75 passing	75	16	10
FL	registration	260	No	n/a		16	HS
GA	licensure	1000	2000 hrs within at least 18 months	written and practical exam with 70% passing score	70	17	HS/GED
HI	licensure	600	1200 hrs within 42 months minimum	exam with 75% passing score	75	16	HS
ID	licensure	600	1200 hrs within 42 months minimum	NIC theory and practical exam		16.5	10
IL	licensure	750	No	written exam on theory and practical knowledge		16	HS
IN	licensure	700	No	written and practical exam with 75% passing score	75	18	10
IA	licensure	600	No	NIC exams with 75% passing score	75		HS
KS	licensure	1000		written and practical exam with 75% passing score	75	17	HS
KY	licensure	1000		fitness to practice exam		18	HS/GED
LA	registration	750	No	practical demonstration, written and oral tests		16	10
ME	licensure	600	1000 hrs over at least 6 months	written and practical exam		17	10
MD	licensure	600	12 months with at least 20 hrs per week; mail monthly training reports to Board	theory and practical exam		17	9
MA	licensure	300		practical and written exam			
MA	licensure	400	required: 2 yrs work experience	practical and written exam			
MI	licensure	400	6 months with average of 80 hrs per month; monthly attendance reports to Board	theory and practical exam with 75% passing score	75	17	9
MN	licensure	600	No	general theory, written practical test, jurisprudence exam			HS
MS	licensure	600	No	exam		17	HS/GED
MO	licensure	750	1500 hrs within 5 yrs with at least 1 hr lecture/demonstration each business day	written and practical exam with 75% passing score	75	17	10

STATE	TYPE OF REGULATION	EDUCATION REQUIREMENTS	APPRENTICESHIP OPTION IN LIEU OF EDUCATION REQUIREMENT	EXAMINATION REQUIREMENT	PASSING RATE	MIN. AGE	MIN. GRADE
MT	licensure	650	No	NIC written and practical exam with 75% passing score	75	18	HS/GED
NE	licensure	600	600 hrs or 600 credits	written and practical exam with 75% passing score	75	17	HS/GED
NV	licensure	900	1800 hrs (apprenticeship program only available if nearest licensed school is more than 60 miles away from residence)	written, practical and jurisprudence exam		18	10
NH	licensure	600	1200 hrs within 42 months minimum	examination			HS/GED
NJ	licensure	1100	No	written and practical exam with 75% passing score	75	17	HS/GED
NM	licensure	600	No	practical, written theory and jurisprudence with 75% passing score	75	17	10
NY	licensure	600	No	written and practical with 70% passing score	70	17	
NC	licensure	600	1200 hrs within 24 months minimum	NIC written and practical exam with 75% passing score	75		
ND	licensure	600	No	NIC written, ND state practical, and jurisprudence exam			
OH	licensure	600	No	practical demonstrations and written exam		16	10
OK	licensure	600	1200 hrs	written and practical exam		16	8
OR	licensure	500	No	written and jurisprudence exam with 75% passing	75		
PA	licensure	300	No	theory exam		16	10
RI	licensure	600	No	NIC written and practical exam with 70% passing score	70	18	HS/GED
SC	licensure	450	No	NIC written and practical exam		16	10
SD	licensure	600	No	NIC written and practical exam and state jurisprudence exam		18	HS/GED
TN	licensure	750		written theory and practical exam passed within 3 yrs		16	
TX	licensure	750	No	written and practical exam with 70% passing score	70	17	HS/GED
UT	licensure	600	800 hrs in not less than 5 months	NIC theory and practical exam with 75% passing score	75		
VT	licensure	600	800-1200 hrs within 12-18 months	written and practical exam		18	HS/GED
VA	licensure		not yet set	written and practical exam			
WA	licensure	750	800 hrs in not less than 5 months	written and performance exam with 75% passing score	75	17	
WV	licensure	600	No	examination		18	HS/GED
WI	licensure	450	No	written and practical exam		18	HS/GED
WY	licensure	600	No	theory and practical exam passed within 1 year		16	10

Source: Information received from Professional Beauty Association and supplemented by review of board applications, statutes and regulations Barber

Esthetician Reciprocity Analysis

Academic Pathway:

45 of 49 states that regulate estheticians meet the 70% threshold for educational hours. The following states do not meet the threshold:

AK - 50%

CT - no regulation

FL - 43%

MA - 67%

MI - 67%

PA - 50%

VA - regulation recently passed, awaiting requirements

Note that if the threshold were lowered to 67%, then two additional states (MA and MI) could be counted. This would yield a 94% reciprocal rate as opposed to 90%.

Apprenticeship Pathway:

15 of 21 states that allow for an apprenticeship meet the 70% threshold. The following states offer an apprenticeship pathway but do not meet the 70% threshold:

AK - 29%

MI - 40%

NE - 50%

UT - 67%

VT - 67%

WA - 67%

Note that if the threshold were lowered to 67%, then three additional states (UT, VT and WA) could be counted. This would yield an 85% reciprocal rate as opposed to 71%.

Some states require an apprenticeship in order to obtain a license, meaning the apprenticeship is not an alternative pathway as it is in New Hampshire and other states. These states were still included in this analysis since the substance and form of experience is substantially similar.

This comparative analysis does not consider the type of exam, passing rate, minimum age or grade/degree accomplishment.



108 Wind Haven Drive, Suite A
Nicholasville, Kentucky 40356
USA
(859) 269-1289 (phone)
(859) 231-1943 (fax)

www.clearhq.org