

The Florida
Electrolysis Council

Draft Minutes

Rules Workshop
February 13, 2015
12:00 p.m. EST

Embassy Suites Hotel
225 Shorecrest Drive
Altamonte Springs, FL

Jolynn Greenhalgh, DNP, ARNP
Chair

Lina Grillo, LE
Vice-Chair

Participants in this public meeting should be aware that these proceedings are being recorded and that an audio file of the meeting will be posted to the Electrolysis Council's website.

1 **Members Present**

2 Ms. Jolynn Greenhalgh, DNP, ARNP, Chair
3 Ms. Lina Grillo, RE, Vice-Chair
4 Ms. Nilsa Lapeyrouse, RE

Staff Present

Anna King, Program Administrator

5 **Attorney General's Office**

6 Edward Tellechea, Chief Attorney
7 Florida Board of Medicine

8 **Court Reporter**

9 Diane Evans
10 Southern Court Reporters, Inc.
11 2750 Meeting Place
12 Orlando, FL 32814
13 407-599-4972
14 407-810-8973
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17 Diane4733@att.net

18 **12:00 p.m.**

19 **Call to Order – Rules Workshop**

20 Ms. Jolynn Greenhalgh called the workshop to order at approximately 12:05 p.m. The roll was
21 called and brief opening comments were provided by Mr. Edward Tellechea concerning the
22 purpose of the workshop.

23 The purpose of the workshop was to hear public comment on the Board of Medicine's directive
24 to take a broader look at distinguishing licensure pathways for those who want to use primarily
25 laser equipment, versus those who want to use an epilator only, versus those who want to use
26 both modalities, and, to hear public comment on the need for certification by a national entity in
27 addition to the laser training course required by rule (or by rule changes made to distinguish
28 licensure pathways) and continuing education (CE) requirements.

29 The following rules were noticed for discussion during the workshop:

- 30 • 64B8-51.006 Rule Governing Licensure and Inspection of Electrology Facilities
31 • 64B8-52.004 Requirements for Approval of Training Courses for Laser and Light-Based Hair
32 Removal or Reduction
33 • 64B8-53.002 Curriculum Standards for Electrolysis Training Programs
34 • 64B8-55.001 Disciplinary Guidelines
35 • 64B8-56.002 Equipment and Devices; Protocols for Laser and Light-Based Devices

36 Comments were received from workshop attendees in the order each signed into address the
37 Council, as follows:

- 1 • Ms. Lennis Denis, licensed Florida Electrologist and instructor at American Cosmetology
2 & Laser Training
- 3 • Mr. Ronald Brunette, licensed Florida Electrologist, 320-hour electrolysis training school
4 owner and 30-hour laser hair removal continuing education provider
- 5 • Ms. Judy Adams, licensed Florida Electrologist and 30-hour laser hair removal
6 continuing education provider
- 7 • Ms. Stephanie McAllister, licensed Florida Electrologist and 320-hour electrolysis
8 training school owner
- 9 • Ms. Hildegard Scott, licensed Florida Electrologist
- 10 • Ms. Michelle Scott, licensed Florida Electrologist
- 11 • Ms. Cindy Cassidy, licensed Florida Electrologist, 320-hour electrolysis training school
12 owner and 30-hour laser hair removal continuing education provider
- 13 • Ms. Samah Abou Hassan, licensed Florida Electrologist
- 14 • Mr. Jon Pellet, Esquire, on behalf of the Society for Clinical & Medical Hair Removal
- 15 • Mr. William Moore, President, Society for Clinical & Medical Hair Removal
- 16 • Ms. Dulce Canaveral, licensed Florida Electrologist, 320-hour electrolysis training school
17 owner and 30-hour laser hair removal continuing education provider
- 18 • Ms. Lora May Swart, licensed Florida Electrologist
- 19 • Ms. Karen Hermanspan, licensed Florida Electrologist and President, Electrolysis
20 Society of Florida (ESF)
- 21 • Ms. Jessica Brasington, license Florida Electrologist

22 Below are brief summaries of the comments offered by each participant. A full transcript of the
23 workshop may be obtained by ordering same from the court reporting service, Southern Court
24 Reporter, Inc.

25 Ms. Denis addressed the Council to express her opinion that the 5 hours of practical training
26 currently required in Rule 64B8-52.004(2)(w), F.A.C., Requirements for Approval of Training
27 Courses for Laser and Light-Based Hair Removal or Reduction is insufficient to teach the
28 various types of laser technology, for example, intense-pulsed light (IPL), diode and Nd Yag.
29 She suggested that the number of practical hours might be increased to 10 hours.

30
31 With regard to the current 320-hour electrolysis training curriculum, Ms. Denis suggested the
32 content should be enhanced to better prepare students for the Society for Clinical and Medical
33 Hair Removal's (SCMHR's) national laser hair removal certification process. National
34 certification is currently required in Rule 64B8-56.002(2)(b), F.A.C., Equipment and Devices;
35 Protocols for Laser and Light-Based Devices, for Electrologists who would like to offer laser hair
36 removal services. To be nationally certified through SCMHR, each candidate must currently
37 take the following exams: 1) Certified Clinical Electrologist (CCE) and 2) Certified Medical
38 Electrologist (CME).

39
40 Mr. Brunette addressed the Council indicating his position that the 30-hour continuing education
41 course in laser hair removal (LHR) should remain available for Electrologists and other
42 practitioners interested in same, even if initial LHR training is incorporated into the 320-hour
43 electrolysis training curriculum.

1 A comment was made regarding the possibility of having two different licenses for those who
2 only wanted to perform LHR services and those who primarily wanted to provide Electrolysis.
3 Mr. Tellechea explained that distinguishing two types of professional licenses in this manner
4 would go beyond the rule development process and require legislative change.

5 Ms. Adams addressed the Council stating her support for incorporating initial LHR training into
6 the 320-hour electrolysis training curriculum, as the change could be accomplished through rule
7 development. Regarding the 30-hour LHR curriculum, Ms. Adams indicated she did not believe
8 any additional practical hours were needed beyond the 5 hours currently specified in rule.
9 Lastly, Ms. Adams indicated she would not be in support of the establishment of two separate
10 licenses for the practice of hair removal in Florida.

11 Ms. McAllister addressed the Council stating her support for retaining the availability of the 30-
12 hour LHR course in addition to incorporating initial LHR training into the electrolysis curriculum.
13 Ms. McAllister suggested the 30-hour requirements be added to the 200 hours of practical
14 training and the 120 hours of academic training be kept as currently written. She clarified her
15 position that the full 200 hours of practical training currently required should not be reduced, but
16 the 30 hours of LHR training should be added to the curriculum, bringing the total hours of
17 required training to 350 hours.

18 Ms. McAllister also indicated that, under current requirements, more emphasis needs to be
19 placed on explaining to prospective licensees that the 320-hour course is required in addition to
20 the 30-hour LHR course.

21 Ms. Hildegard Scott and Ms. Michelle Scott briefly addressed the Council to indicate their
22 support of the statements made by Ms. Adams.

23 Ms. Cassidy addressed the Council to inform of her observation that many students who initially
24 expressed interest only in laser hair removal eventually began to enjoy the electrolysis training.
25 She indicated that practical training is what really “turns on the light bulb” and is crucial to
26 understanding hair removal.

27 Ms. Hassan addressed the Council indicating she had just completed her electrolysis training
28 and believed more LHR training hours and more contraindications in practice should be
29 addressed in the curriculum.

30 Mr. Pellet and Mr. Moore addressed the Council. Mr. Pellet stated that incorporation of the 30
31 hour LHR training into the 320 hour curriculum will impact the 30-hour continuing education
32 providers and any rule changes would require preparation of a Statement of Estimated
33 Regulatory Costs (SERC).

34 Mr. Pellet stated his understanding that the American Electrology Association (AEA), current
35 provider for the Florida Electrologist licensure examination, only tests on the 320-hour
36 electrolysis training. Council staff informed of its recent communication with the AEA regarding
37 potential training curriculum changes that would incorporate LHR and the AEA’s resulting
38 indication of its willingness to look at accommodating this change.

1 Mr. Moore stated that national recertification through the SCMHR as a CME is important to
2 ensuring continued proficiency in laser hair removal for Florida Electrologists. Mr. Moore also
3 indicated the Council might consider SCMHR's more advanced Certified Laser Hair Removal
4 Professional (CLHRP) credential as an alternative to the CCE and CME.

5 Ms. Greenhalgh stated that competence in the profession is gained through practice and
6 completion of continuing education courses, not by repeatedly being examined.

7 Mr. Pellet requested an additional rules workshop in South Florida. He also indicated that his
8 office is currently in the process of gathering state-by-state requirements for laser hair removal
9 that he would like to be able to provide for review.

10 Mr. Tellechea indicated it would be difficult to convince the Legislature that increased regulation
11 is needed when there are no disciplinary cases regarding the standard of care for Florida
12 Electrologists.

13 Ms. Canaveral indicated she would like to see the elimination of the requirement for obsolete
14 multi-needle electrolysis equipment.

15 Ms. Hermanspan briefly addressed the Council to indicate ESF is in agreement with initial
16 national certification in laser hair removal, but does not feel that recertification is needed.

17 Mr. Tellechea inquired of the Council whether it would like to host an additional rules workshop.
18 The Council members agreed they did not want to hold a third workshop, indicating that enough
19 feedback had been received to allow the Council's attorney, Ms. Marlene Stern, to begin
20 drafting rule changes for its consideration.

21 Mr. Pellet inquired regarding whether Council staff was able to locate proposed changes to the
22 curriculum previously submitted on behalf of a client, Vector Institute, several years ago.
23 Council staff informed that a search of the Electrolysis Council's records did not produce the
24 specific draft curriculum referenced, but that Board of Medicine staff would be consulted to
25 determine whether it might have this documentation on file.

26 At this point in the workshop, extensive discussion took place on specific changes to the rule to
27 incorporate laser into the 320-hour electrolysis training curriculum. The current version of the
28 rule considered is as follows:

29 **64B8-53.002 Curriculum Standards for Electrolysis Training Programs.**

30 In order to be approved by the Board, an electrolysis training program must meet the following curriculum
31 standards:

- | | | |
|----|--|-------|
| 32 | (1) Academic instruction to be set out in school catalog. | Hours |
| 33 | (a) Introduction to electrolysis techniques through Galvanic, Thermolysis | 15 |
| 34 | and Blend, history of permanent hair removal, general treatment procedures | |

1	(b) Principles of electricity, epilator functions, and adjustments.	5
2	(c) Integumentary System (skin and appendages).	10
3	(d) Circulatory (blood and lymph) and nervous system.	10
4	(e) Endocrine system, including related diseases.	10
5	(f) Biology of hair growth.	10
6	(g) Skin assessment, including types, effects of specific current, effects of	15
7	temporary removal.	
8	(h) Study of blood-borne pathogens with emphasis on hepatitis (all types),	10
9	and HIV/AIDS.	
10	(i) Microbiology of the skin (flora and fauna), sanitation and safety	10
11	procedures including demonstrations in accordance with Rule 64B8-56.001,	
12	F.A.C.	
13	(j) Clinic and office management, communications, professional ethics,	10
14	bookkeeping, and patient management.	
15	(k) Study of Chapter 64B8, F.A.C., as it relates to electrolysis, Chapter	10
16	478, F.S., and Chapter 456, Part II, F.S.	
17	(l) Consultations.	5
18	Subtotal	120 hours
19	(2) Clinical Application	Hours
20	(a) Coordination skills with probe holder and forceps.	5
21	(b) Insertions	15
22	(c) Sanitation/Sterilization Procedures	10
23	(d) Hands on Equipment Instruction (Electrolysis)	5
24	(e) Hands on Equipment Instruction (Thermolysis)	5
25	(f) Hands on Equipment Instruction (Blend)	5
26	(g) Client Pre/Post Treatment	5
27	(h) Client Assessment	10

1	(i) General Treatment Procedures	105
2	(j) Consultations	15
3	(k) Visuals/Library	10
4	(l) Review/Exam Preparation	10
5	Subtotal	200
6	Total	320 hours

7 *Specific Authority 478.43(4), 478.50(4)(b) FS. Law Implemented 478.43(4), 478.45(1)(e), 478.50(4)(b) FS. History—New 9-29-93,*
8 *Formerly 61F6-78.002, 59R-53.002, Amended 11-13-97.*

9 During the discussion, Ms. McAllister, Ms. Cassidy, Ms. Adams, Mr. Brunette, Ms. Swart and
10 Ms. Brasington addressed the Council.

11 Mr. Tellechea suggested changes might be made to paragraphs (1)(a), (b) and (g) of the rule.
12 Ms. Grillo also indicated that paragraph (1)(k) might also be modified to read as follow: “*Study of*
13 *Chapter 64B8, F.A.C., as it relates to electrolysis/laser....*”

14 Ms. Greenhalgh indicated that the LHR training currently consists of 30 hours which would need
15 to be incorporated into the current 120 hours of academic training required. Mr. Tellechea
16 explained that no more than 120 hours could be allocated towards the academic training due to
17 statutory limitations, so, it would be a matter of switching or merging items as needed to stay
18 within this limit.

19 Mr. Tellechea inquired as to whether paragraph (1)(a) might be made inclusive of both
20 electrolysis and laser with the following modification: *Introduction to permanent hair removal to*
21 *~~electrolysis techniques through Galvanic, Thermolysis and Blend....~~*”

22 Ms. McAllister suggested reductions in hours for paragraphs (1) (c) – (f), (i), (j) and (k) to make
23 30 hours available for the laser training. Ms. Lapeyrouse and Ms. Greenhalgh clarified that only
24 25 hours are needed for the academic portion as the other 5 hours of LHR are practical.

25 Ms. Adams indicated that the primary areas covered in the LHR course, which should be
26 incorporated into this rule, are laser physics, laser safety and skin-typing.

27 Ms. Swart indicated that paragraph (1)(h), regarding blood-borne pathogens, might be reduced
28 from 10 hours to 3 hours, which she indicated is the standard number of hours required for this
29 topic in other medical professions.

30 Mr. Tellechea indicated that the 3 major areas referenced by Ms. Adams would be looked at for
31 incorporation into paragraphs (1) (a), (b) or (g). He stated that he and Ms. Stern would aim to
32 provide a draft incorporating the recommendations for initial review by the Council Chair prior to
33 presentation to the full Council. Mr. Tellechea asked that Council members and any other
34 workshop participants provide any additional comments regarding rule changes to Ms. King to
35 assist in the rule drafting process.

1 The Council agreed that the remaining 5 hours of practical in LHR did not need to be increased.
2 Mr. Tellechea indicated he would consult with the Council Chair regarding where in the existing
3 200 hours of clinical training these 5 hours might be placed.

4 Ms. Cassidy suggested the LHR practical hours might be substituted for paragraph (2)(d), which
5 covers use of the multi-needle equipment Ms. Canaveral mentioned earlier was considered
6 obsolete.

7 Ms. Grillo suggested a reduction in paragraph (1)(k) from 10 hours to 5 hours.

8 Ms. Adams agreed with Ms. Cassidy's suggestion and also recommended elimination of the
9 corresponding equipment requirement in Rule 64B8-53.003, F.A.C., Required Equipment for
10 Electrolysis Training Programs under paragraph (1)(c) of that rule.

11 Mr. Brunette recommended moving the "Electrolysis" or "Galvanic" training currently in
12 paragraph (2)(d) of the clinical portion to paragraph (2)(f) for coverage along with the "Blend"
13 method.

14 For paragraph (1)(a), Mr. Brunette suggested changing the language to permanent hair and
15 "reduction" techniques to combine laser along with the other modalities. He recommended use
16 of the term "reduction", as LHR is considered to be a reduction procedure versus permanent
17 removal.

18 Ms. Lapeyrouse recommended use of "Electrolysis" instead of "Galvanic" in paragraph (2)(f).

19 Mr. Tellechea again indicated that he and Ms. Stern would discuss finalizing the first draft with
20 the Council Chair and then look to schedule another conference call prior to the Council's
21 meeting in May 2015. Mr. Tellechea suggested that feedback on the first draft be submitted to
22 Ms. King no later than February 27, 2015. The Electrolysis Training schools will be contacted
23 for input as well. Mr. Tellechea indicated he is particularly interested in knowing how much lead
24 time the schools might need to make this transition to assist in determining an effective date for
25 any changes incorporated in the rule.

26 Ms. Greenhalgh mentioned that consideration needs to be given to the financial impact on the
27 electrolysis training schools that do not currently have laser machines. Ms. Lapeyrouse and
28 others indicated that many laser machine manufacturers are willing to bring the machines onsite
29 and provide training for free. Mr. Tellechea suggested Council staff began research in
30 preparation for developing a SERC regarding the proposed rule changes.

31 Ms. Greenhalgh also brought up the issue of physician supervision requirements during the 5
32 hours of LHR training. Mr. Tellechea indicated this would impact the schools, as the supervision
33 requirement is already required in statute any time LHR services are provided by an
34 Electrologist.

35 Ms. Brasington addressed the Council to inquire why supervision would be required if the
36 practical training is being conducted only on students within a training program or the student is

- 1 practicing on him or herself. Ms. King mentioned to Mr. Tellechea that there is an exemption in
- 2 Section 478.54(2), F.S., regarding students in training programs, which might be reviewed in
- 3 light of the discussion. Mr. Tellechea indicated his office would research the impact of this
- 4 section. Additionally, any discussion regarding changes to the examination would be deferred
- 5 until the Council takes action on revisions proposed to the rule.

- 6 The meeting adjourned at approximately 2:41 p.m.