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April 23, 2025

The Honorable Joseph J. Solomon, Jr., Chair  
House Committee on Corporations  
State House  
82 Smith St.  
Providence, RI 02908

**RE: H 5833 – An Act Relating to Businesses and Professions— Mobile Cosmetology and Barbering Services**

Dear Chair Solomon:

Please accept this letter, with concerns, regarding H 5833, legislation that would allow the licensure and operation of mobile cosmetology, hairdressing, barbering, aesthetics, and manicuring services. The Rhode Island Department of Health (RIDOH) agrees that mobile services offer customers increased convenience and, with respect to customers with special needs or sensory-related differences, such services offer increased accessibility and comfort.

A visit to a cosmetology/hairdressing salon, barber shop, aesthetician, or manicurist can be challenging for people with disabilities, certain neurologic conditions, or sensory-related disorders. People with disabilities may face challenges, including mobility challenges, that make it difficult to access these services as often as they would like. Cosmetologists, hairstylists, barbers, aestheticians, or manicurists that come to the home can provide services to people with disabilities in the comfort and privacy of their own home.

However, H 5833 goes beyond allowing these services to be provided by licensed professionals in the home as it creates a new type of “mobile unit”, which is defined as being “a vehicle approved by the board in which interior space is designed and equipped for mobile services.” Although not opposed to the establishment of mobile units, they are not currently licensed by RIDOH, and RIDOH would require additional financial resources to inspect, license, and respond to complaints concerning mobile units.

Additional support would be necessary as RIDOH currently only has one person to oversee the board management, inspections, testing, complaints, and licensing review for cosmetologists, hairstylists, barbers, aestheticians, or manicurists. This includes more than 10,000 current licensees. Although it is difficult to determine how many mobile units RIDOH would have to license, RIDOH anticipates that the interest and demand for mobile services is likely to be considerable. At least one additional .5 FTE would be required to implement this new licensure initiative, at a total cost of \$55,500.35 (salary and benefits) that would be subject to annual increases. Without this resource, RIDOH is unable to implement the proposed legislation as currently drafted.

RIDOH also has concerns regarding the drafted language. They include:

1. References to “board’s regulations”: Under R.I. Gen. Law 5-10-2, RIDOH has the responsibility of creating rules and regulations for this license, not the Board. We recommend replacing that language with “Department’s regulations” wherever referenced.
2. References to the Board authorizing or approving the mobile unit: As referenced in the previous item, RIDOH provides the licensing and inspections of brick-and-mortar shops and will need to incorporate this work into RIDOH’s scope. RIDOH believes that the explanation of who has this

- responsibility (RIDOH) needs to be clearly outlined for the public.
3. Using the term “registration”: The process of registering versus licensing at RIDOH is the same and can be confusing to the public, so for consistency and clarity, RIDOH asks that any reference to registration be changed to “licensing” or “license” and “registrant” be changed to “licensee”.
  4. The inclusion of intense pulse light services and equipment expands the scope of practice beyond that currently allowed in Rhode Island regulations. References to intense pulse light services and equipment should be deleted to protect public health and safety.
  5. The regulatory scope created is unclear. RIDOH should have full authority to regulate these entities as it would any other licensee or facility.

Thank you for the opportunity to comment on this well-intended legislation.

Sincerely,

A handwritten signature in black ink, reading "Jerome M. Larkin". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Jerome M. Larkin, MD  
Director

CC: The Honorable Members of the House Committee on Corporations  
The Honorable Mary Ann Shallcross Smith  
Nicole McCarty, Esquire, Chief Legal Counsel  
Lynne Urbani, Director of House Policy