



PRELIMINARY



**UTAH DEPARTMENT
OF COMMERCE**

Office of Professional Licensure Review

Preliminary Recommendations: Cosmetology, Massage, and Building Inspectors

Business and Labor Interim Committee

Aug 21, 2024

Review timeline

Phase I (Jan - Mar): fact base

- Literature review
- Interstate policy scan
- Stakeholder identification
- Exploratory interviews with DOPL, industry, others
- Identify key questions, data, and analyses

Phase II (Mar - June): investigation

- Expert interviews
- Survey of licensees
- Focus groups as needed
- DOPL complaint & case notes analysis
- Other datasets as available

*Findings in Interim
Business & Labor
in **June***

Phase III (June - Aug): recommendations

- Gather potential recommendations
- Categorize and filter
- Follow-up analyses
- Vetting with key stakeholders

*Recommendations in
Interim Business & Labor
in **August***

Phase IV (Aug - Dec): written report

- Draft report
- Internal review (OPLR, DOPL, Commerce)
- External review by key stakeholders
- Final edits and publication (OPLR website)
- Support legislation as needed

*Draft bill in Interim
Business & Labor
in **October***



Progress to date

Primary Data Collection

OPLR Survey of Licensees¹

- Cosmetology
 - **4,000** total respondents
 - 750 open-ended comments
- Massage Therapy
 - **900** total respondents
 - 260 open-ended comments
- Building Inspectors
 - **240** total respondents
 - 90 open-ended comments

Stakeholder Listening Tour

- Expert & Leader Interviews (50+)
- Industry Focus Groups (15)
 - **70+** total attendees
 - **500+** minutes of recordings
 - **4 site visits** to training institutions and workplaces



OPLR's periodic review criteria

- OPLR 'shall consider' the following in its reviews (paraphrased from Utah Code 13-1b):
 - Present, recognizable, significant **harm to the public**...including the **severity**, **probability**, and **permanence** of the harm
 - **Economic effects** of regulation (supply, barriers, costs, interstate reciprocity)
 - Regulation in **other jurisdictions**
 - **Solutions** (costs to the state, least burdensome regulatory options)
 - **Any other criteria** the office adopts

Agenda

- Cosmetology
- Massage Therapy
- Building Inspectors



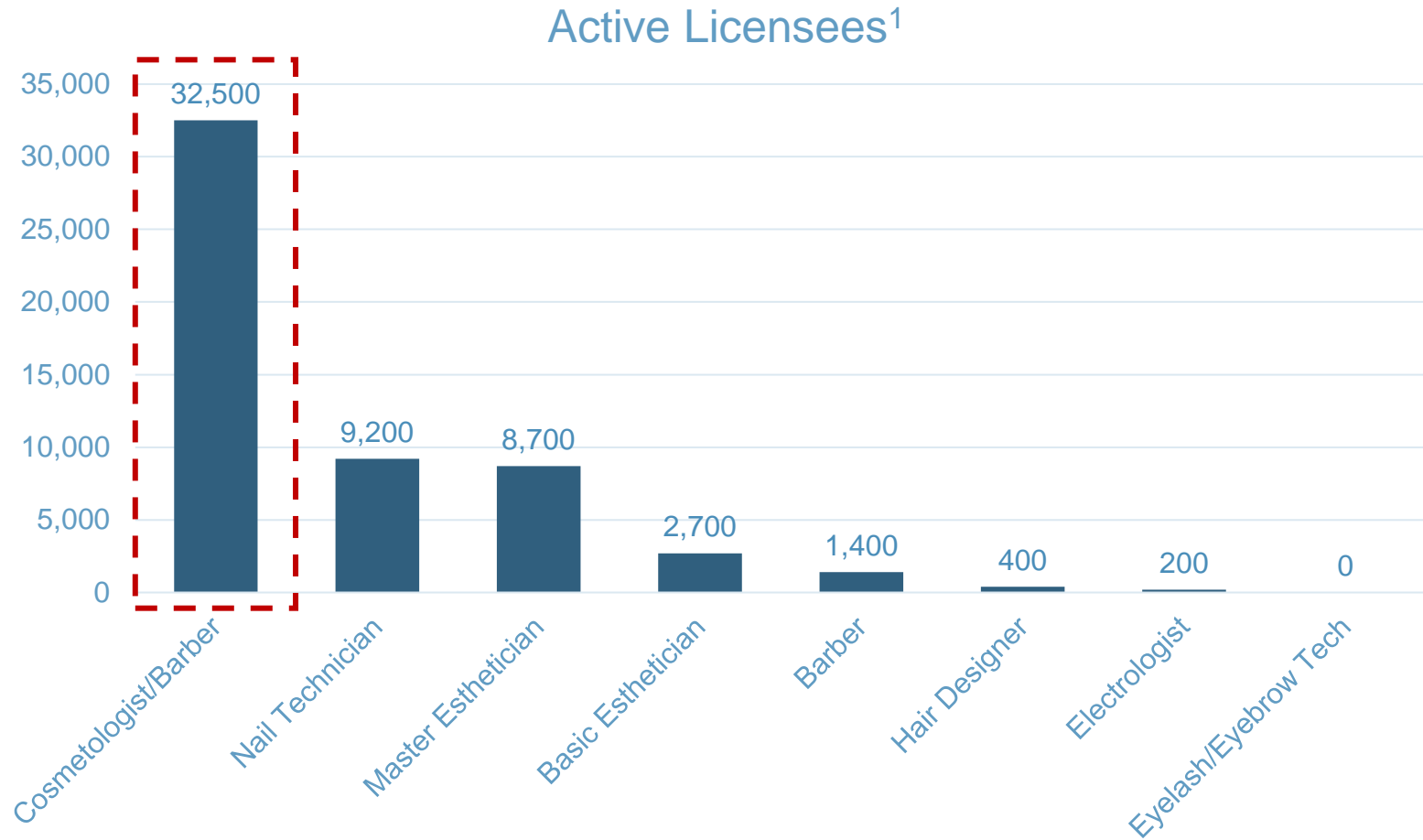
Problem: Current licensing creates unnecessary burdens on those most in need of opportunity

- Cosmetology and esthetics offer opportunity for those **without a high school or college degree**¹
 - 85% of licensees have less than a 4-year college degree (~44K licensees)
- The **structure of cosmetology licenses is complex**, with micro-licenses (barbering) nested within sublicenses (hair design) nested within broader licenses (cosmetologist/barber) that also overlap with others (master esthetician)
- Utah's most common license (cosmetologist/barber) has a very broad scope and requires 1,600 hours, of which a significant proportion is **unrelated to consumer safety**²
 - Risk of harm to cosmetology consumers is rated relatively low to moderate by the Federal Bureau of Labor³
 - Education for cosmetology involves **200+ hair services**, but limited or no training in some **higher risk services** (e.g., eyelash extensions, lasers)²; hours may also include training on non-licensed skills (marketing)
- Licensing requirements unrelated to consumer safety result in **economic inefficiencies**
 - Costs of training are high relative to consumer risks and the low wages; those wishing to specialize may spend unnecessary time and money to earn overly broad licenses driving up costs^{4,5}
 - Utah's current licensees have completed more than **5 million training hours unrelated to consumer safety**, based on OPLR's estimate of safety related training hours (see appendix)⁶



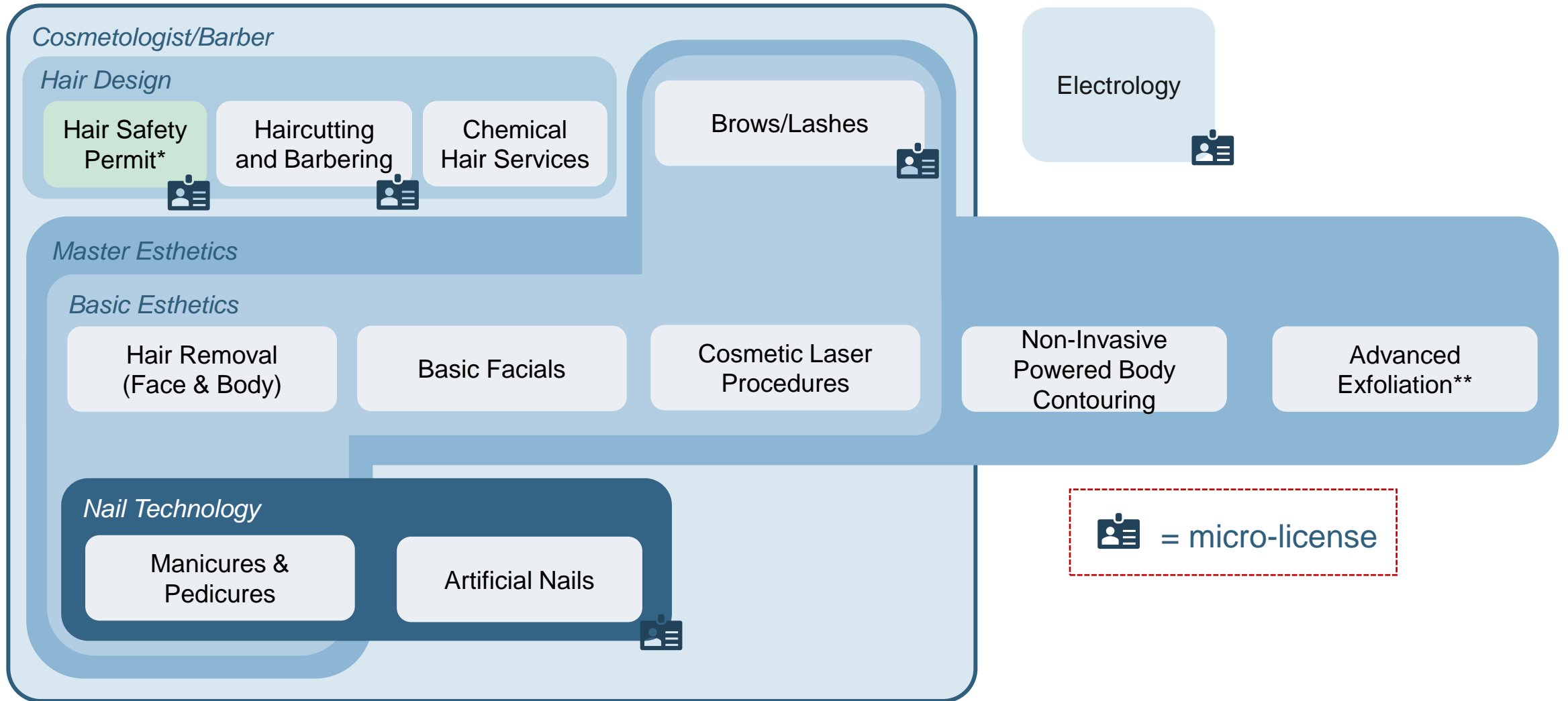
Finding: cosmetology/barber is the most common license with nails and esthetics (skin) next

The Cosmetologist/Barber license has the broadest scope, encompassing hair, nail, and basic skin services.



1. Utah Department of Commerce, Report: DOPL Active License Count, Accessed 8/8/2024. Counts rounded to the nearest 100. Please note that the Eyelash/Eyebrow Technician license was newly created in the 2024 General Session and no licenses have been issued yet while rulemaking is being finalized.

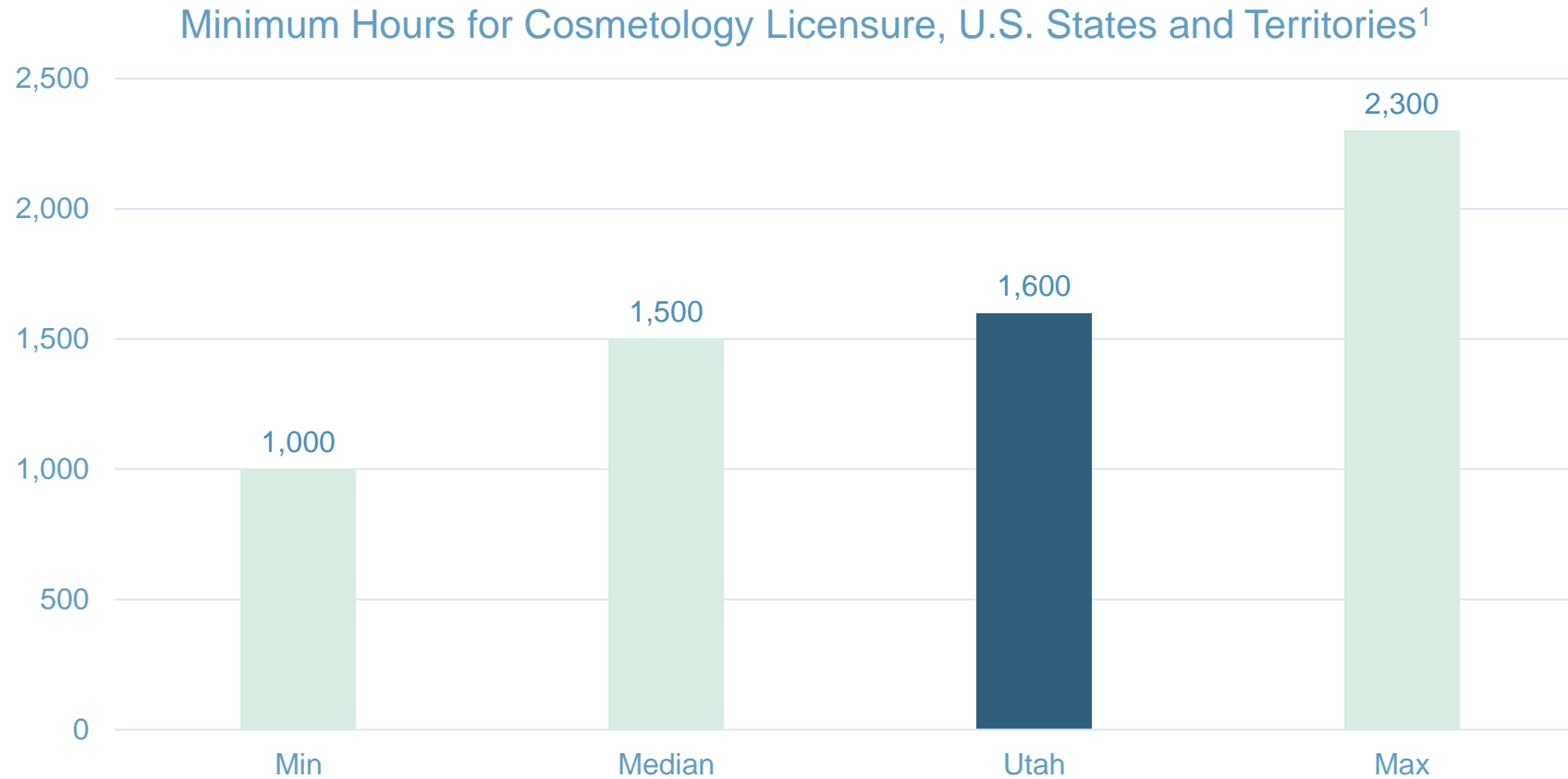
Finding: cosmetology licenses have significant overlap



*The Hair Safety Permit allows individuals to shampoo hair and perform thermal styling services (blow dry, curling, ironing).

**Advanced Exfoliation includes more invasive skincare treatments such as dermaplaning, microneedling, and high-concentration chemical peels.

Findings: Comparison of current Utah Cosmetology/barber hours to other states



Finding: Cosmetology licensees are typically female, lower income, and working part time

Demographic snapshot:

- Licensees are **majority female** (95%)
- **85% of licensees** have less than a four-year college degree¹
- **~42% used Pell grants** (of those licensed in the last 10 years)¹

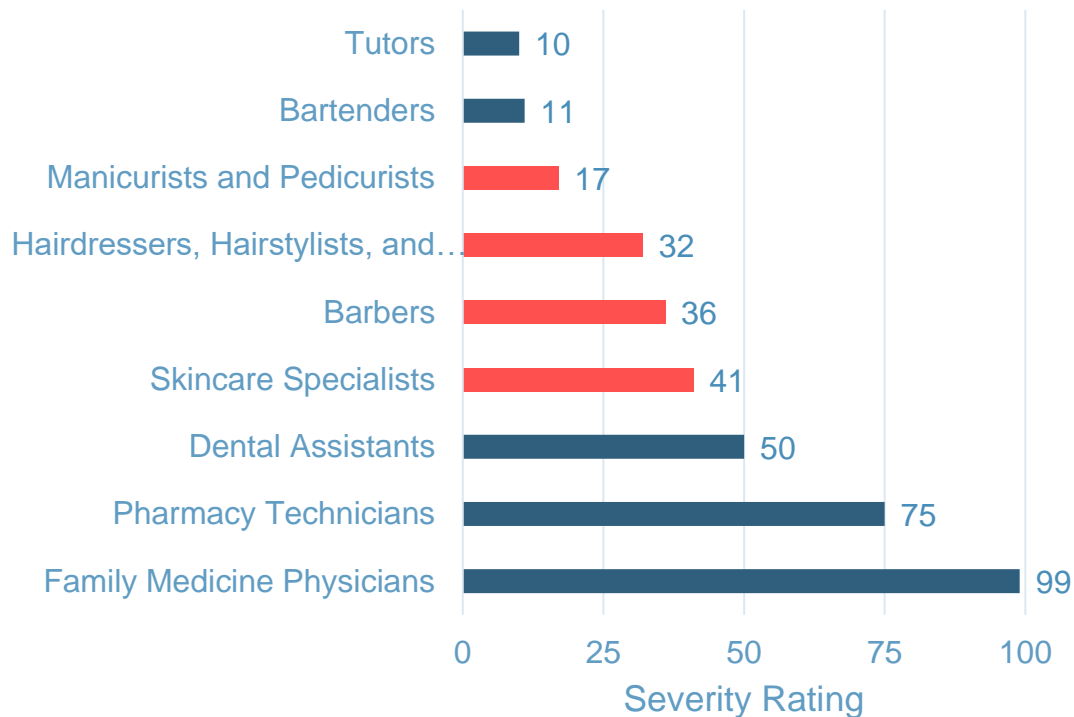


License Type	National Median Hourly Wage ²	Utah Licensees, Licensed Between 2014-2024 ¹	
		Average Debt Incurred	Average Debt Still Held
Cosmetologist/Barber	\$16.87	\$6,300	\$4,000

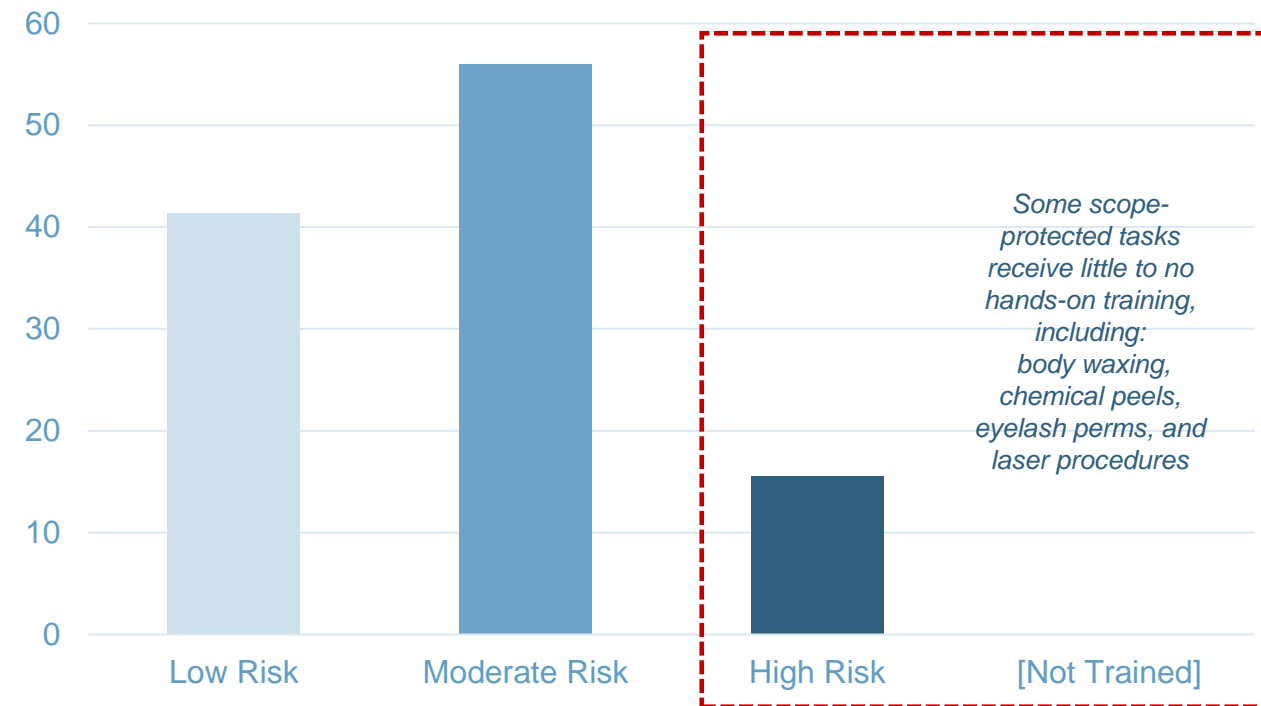
- 73% of cosmetology/barber licensees **work independently** (e.g., not as employees)¹
- 59% of respondents worked **20 hours or less per week** (of those who reported working in 2023)¹

Finding: Cosmetology is low/moderate safety risk; training may not be fully aligned with consumer safety

Consequence of Error Rating – U.S. Dept of Labor¹



Current Cosmetologist/barber training time (1,600 hours)²
Average Student Hands-On Hours per Skill, By Risk Level



Finding: Some students and licensees prefer smaller micro-licenses for faster, more targeted training



In a focus group of Cosmetologist/Barber licensees, **40% responded that they would have been interested in a microlicense** if available while they were in school.¹



“I got my **esthetician license to do lashes** in Utah and I think it’s great we have a new law for that [eyebrow/eyelash].” – *Basic esthetics licensee*²



“**I could totally see people taking a course just to do waxing.** It’s become a big trend...to just be a waxing specialist, and my aunt makes a great living off of it.”
-*Current Cosmetology/Barber student, OPLR Focus Group*



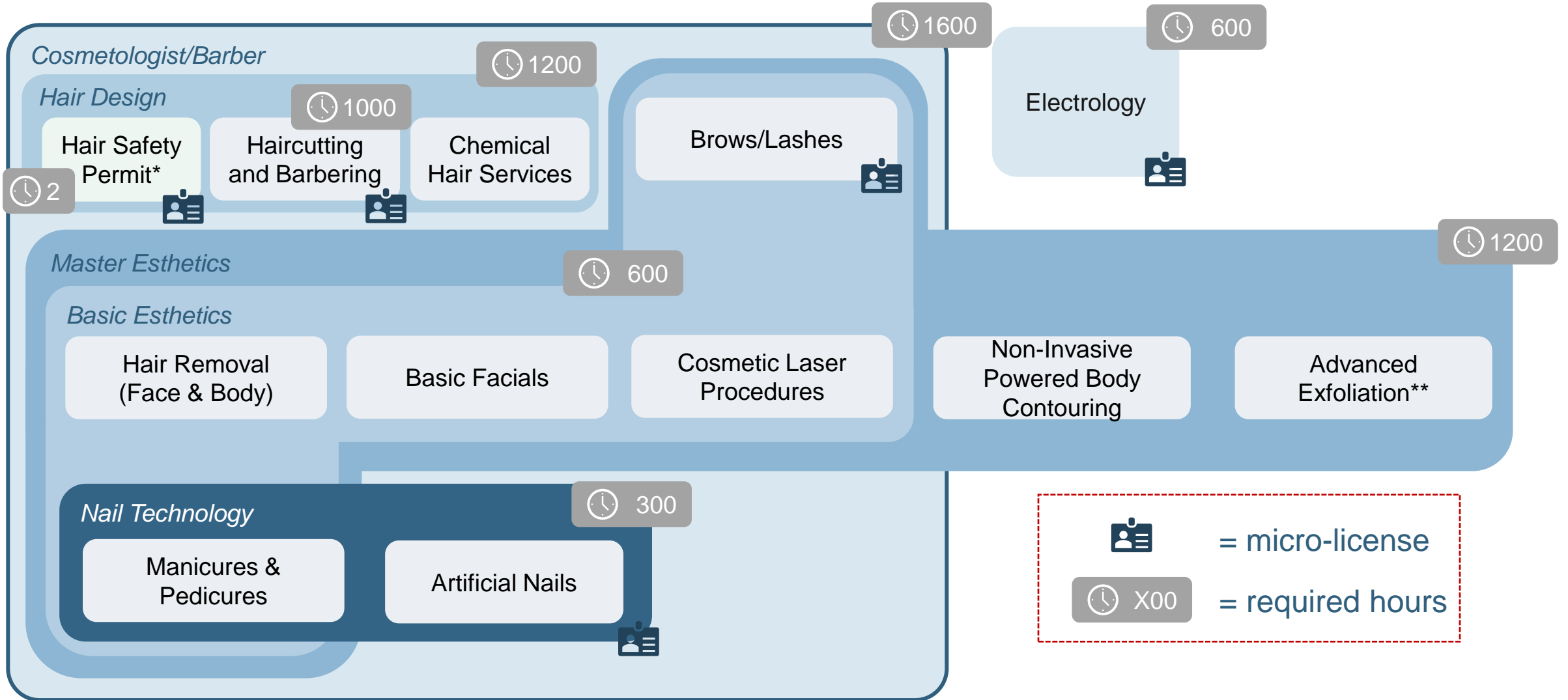
Analysis: Licensure requirements unrelated to safety result in economic inefficiencies



- Licensing requirements and costs of training are **high relative to the risks of consumer harm** and low wages¹
- Specialists may spend added time and money on **unnecessary classes to earn broad-scope licenses**¹
- Overly strict licensing requirements can **exclude qualified individuals** from employment, **drive up consumer costs**,² and **burden self-employed workers**³

OPLR estimates that Utah's current licensees have completed at least **5 million training hours** unrelated to consumer safety⁴, at a cost of:
~\$1,000 per licensee, and
~\$50,000,000 total⁵



Current licensing structure and required hours



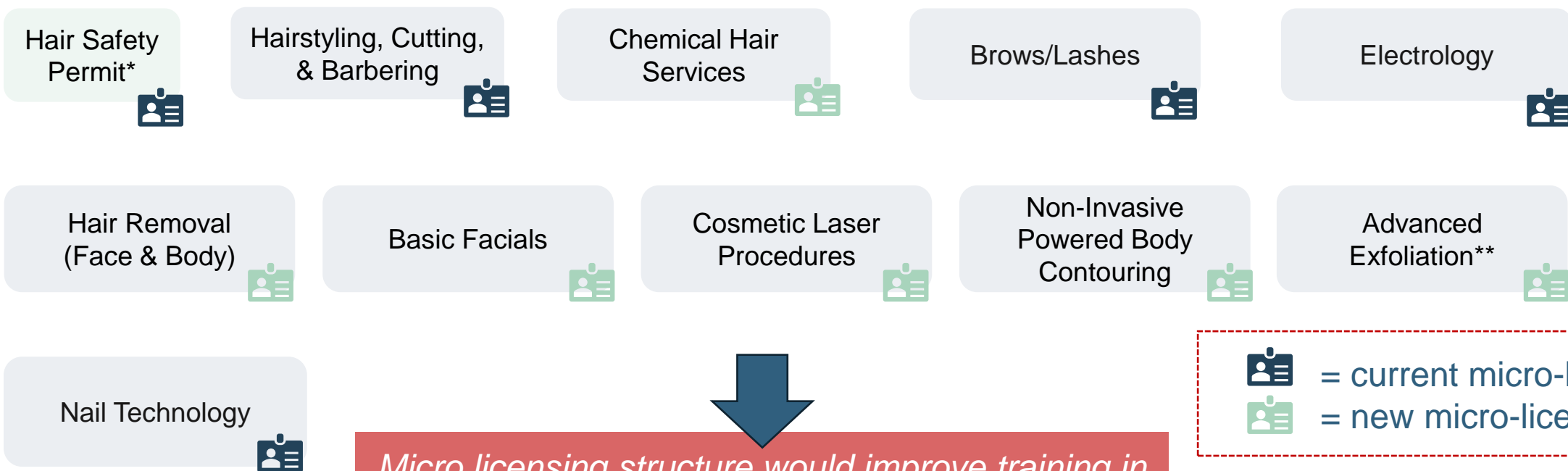
 = micro-license
 X00 = required hours

*The Hair Safety Permit allows individuals to shampoo hair and perform thermal styling services (blow dry, curling, ironing).

**Advanced Exfoliation includes more invasive skincare treatments such as dermaplaning, microneedling, and high-concentration chemical peels.

Recommendation 1: Create micro-licenses to increase licensee choice

'Micro-license' licensing structure:



Micro licensing structure would improve training in specific services and lower burden to new entrants or licensees wanting to add skills

*The Hair Safety Permit allows individuals to shampoo hair and perform thermal styling services (blow dry, curling, ironing).
**Advanced Exfoliation includes more invasive skincare treatments such as dermaplaning, microneedling, and high-concentration chemical peels.

Recommendation 2: Require minimum service counts (hands-on reps) for scope-protected services

Current Regulation



Required curriculum topics defined in rule

- Full flexibility within minimum hours to allocate training time and format by topic
- No explicit requirements for minimum hands-on training



Students not guaranteed hands-on training on all scope-protected activities

Proposed Regulation



Required curriculum topics defined in rule



Minimum service counts for each scope-protected service

Cosmetologist Example

Min # of Haircuts

Min # of Chemical Services

Min # of Lash Extensions

Min # of Waxes



Students guaranteed hands-on training on all scope-protected activities

Minimum hands-on reps would be based on multiple sources, including other occupations

Utah Beauty School
'Service Sheets'

Many **Utah schools** already set targets for minimum services

Survey of
Licensees

Over **150 licensees** gave input on minimum service counts for safety

Other States'
Licensing
Requirements

Several **other U.S. states** (AK, MN, OR) have minimum service requirements

Industry
Experts

OPLR conducted **focus groups and interviews** with students, instructors, school owners, and employers

Medical Hands-On
Training

Medical professions also require minimum hands-on training of practical skills for safety and competence

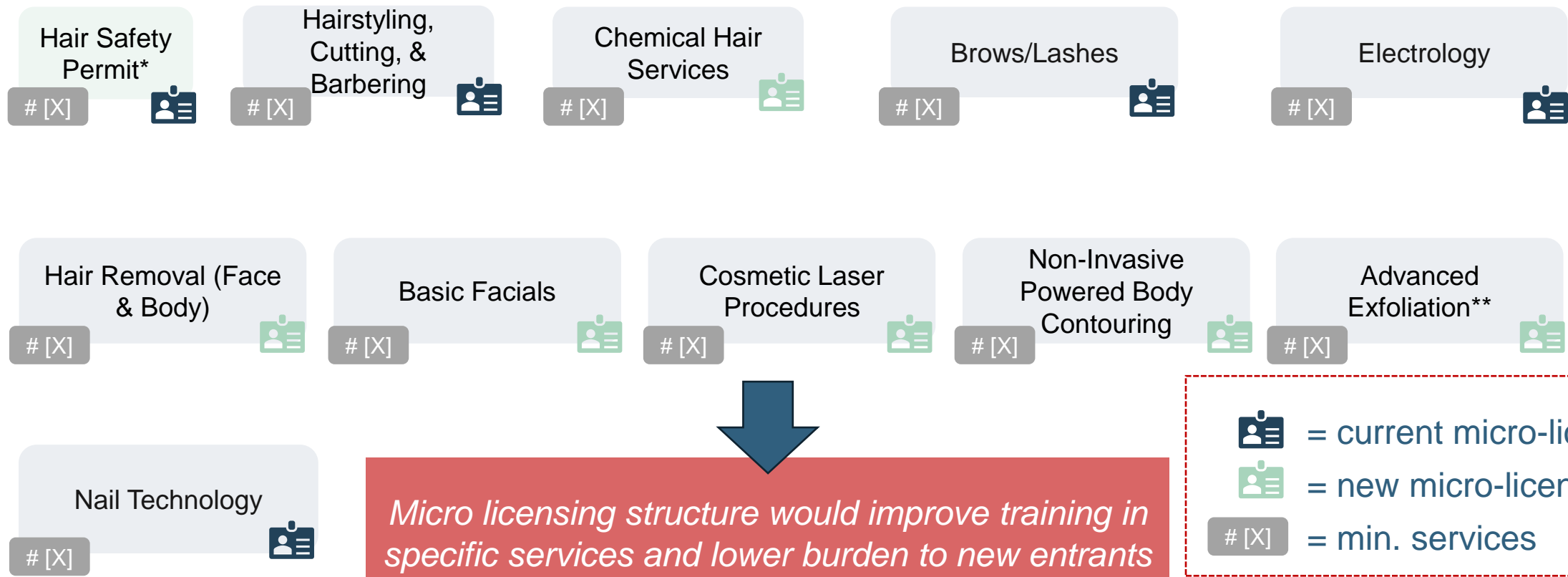
Examples of minimum hands-on reps required in medical training:

Occupation & Task	Minimum reps
Phlebotomy: Venipunctures ¹	30-100
Anesthesiology: Orotracheal intubation ⁴	~45
ER medicine: Adult trauma resuscitation ⁵	35
General medicine: Lumbar puncture ²	~15
Otolaryngology: Endoscopic sinus surgery ³	7-10
Phlebotomy: Skin punctures ¹	5-10
Ophthalmology: YAG laser capsulotomy	minimum 5

1. www.amcaexams.com; acacert.com 2. Examination of Learning Trajectories for Simulated Lumbar Puncture Training Using Hand Motion Analysis, <https://doi.org/10.1111/acem.12753>. 3. Learning Curves, Acquisition, and Retention of Skills Trained with the Endoscopic Sinus Surgery Simulator. https://journals.sagepub.com/doi/abs/10.1177/194589240401800204_4. 4. The Construction of Learning Curves for Basic Skills in Anesthetic Procedures: An Application for the Cumulative Sum Method, https://journals.lww.com/anesthesia-analgesia/fulltext/2002/08000/The_Construction_of_Learning_Curves_for_Basic.33.aspx. 5. ACGME Emergency Medicine Defined Key Index Procedure Minimums, https://www.acgme.org/globalassets/pfassets/programresources/em_key_index_procedure_minimums_103117.pdf.

Option A: Create micro-licenses with minimum service counts (hands-on reps) for each

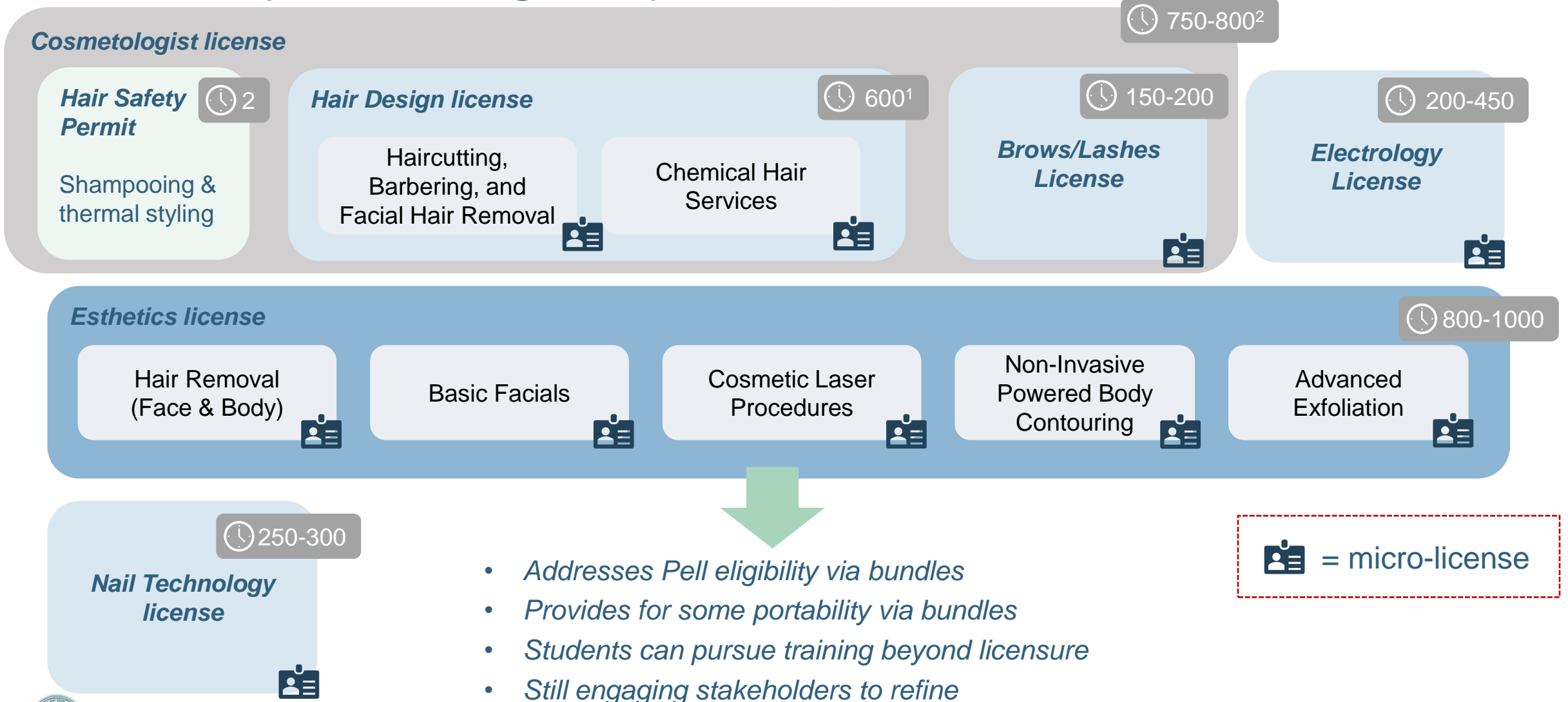
'Micro-license' licensing structure: with added minimum service counts



*The Hair Safety Permit allows individuals to shampoo hair and perform thermal styling services (blow dry, curling, ironing).

**Advanced Exfoliation includes more invasive skincare treatments such as dermaplaning, microneedling, and high-concentration chemical peels.

Option B: Provide 'bundled' licenses to allow for portability, Pell eligibility, and practical considerations



1. Federal financial aid (e.g., Pell grants) require a minimum of 600 hours for eligibility affecting 40+% of all Utah students in cosmetology (more below on this topic)
 2. Hours are based on surveyed licensees and OPLR analysis; we expect hours to continue to shift as we engage with stakeholders

Stakeholder concerns

- **Accreditation for restructured programs** – Requiring accreditation for each restructured or new microlicense program would place significant burdens on training programs. Allowing an alternative curriculum approval process through DOPL may be necessary.
- **Federal financial aid eligibility** – According to federal regulations, any licensure requirements below 600 hours will make students ineligible for federal student aid, including Pell grants and loans; this could be addressed by bundled licenses.
- **Interstate portability** – Restructuring the licensure model could complicate interstate portability for those wishing to practice outside of Utah; this could be minimized by bundled licenses.
- **Board representation** – the current board has limited representation from public members and licensees unaffiliated with training programs.
- **Legacy licenses & system transitions** – Restructuring the licensure model could create the need to transition existing licenses to a new system or maintain a large volume of legacy licenses; this could be minimized by bundled licenses.



Proposed reforms affect stakeholder groups differently; Utah Code 13-1b prioritizes consumers and licensees

Utah Consumers



- Consumers will be safer when licensees receive guaranteed hands-on training for all relevant services
- Licenses will better communicate actual training and expertise

Licensees



- Licensees can use microlicenses as more precise signals of training and specialization
- Micro-licenses give professionals more flexibility to expand scope after initial licensure

Students (future licensees)



- Lower cost of training (time and money)
- Students will have more flexibility to generalize or specialize as they choose
- Students will be guaranteed hands-on experience in their chosen field

Training Providers



- Reforms will be disruptive
- New licenses may require providers adapt curriculum, space, and equipment
- New micro-licenses (and add-on programs for quality) may also be a market opportunity



Agenda

- Cosmetology
- **Massage Therapy**
- Building Inspectors



Problem: Sexual misconduct and illegal activities mar the legitimate practice of massage

- Massage licensing in Utah is two-tiered with a 600-hour Massage Therapist and the new **300-hour Massage Assistant** (as of 2023)
 - Utah's Massage Therapist license requirements matches most other states; Utah's low-barrier Massage Assistant license and apprentice pathway are rare and may attract illicit activities to Utah (see below)
- **Medical-adjacent massage therapy** as an adjunct to healthcare is beneficial and growing
 - Preliminary studies indicate that massage may improve depression and anxiety symptoms, immune response, and fatigue in cancer patients²
- **Severe or permanent physical harm is rare** in legitimate massage
 - Malpractice insurance data show 0.1% of massage therapists have a claim for physical harm in any given year³
- **Sexual misconduct and other illegal activities** do occur under the guise of massage
 - Of 41 DOPL substantiated complaints that involved direct consumer harm over the last five years, virtually all (39) related to sexual misconduct of a consumer by a licensee⁴
 - Roughly 25% of DOPL's 100+ unlicensed practice complaints over the same period involved law enforcement related to probable human trafficking, sex trafficking, or commercial sex (all illegal activities)⁴
 - Human trafficking and illicit massage businesses are active in Utah with roughly 150 storefronts identified⁵

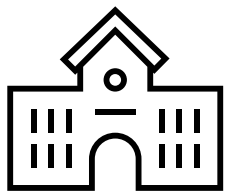


SB 42 established the massage assistant license, creating multiple tracks within massage

Massage Assistant

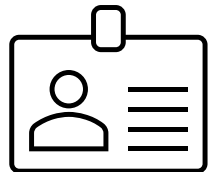
Scope: **limited massage therapy** under indirect supervision; does **not** include work on complex cases

- 1 licensee, 0 “in-training”
- Very rare; no other states have equivalent



300 hours in an approved massage program*

OR



300 hours as a licensed assistant-in-training*

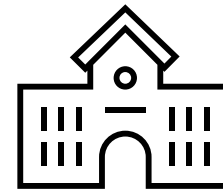


Utah Exam

Massage Therapist

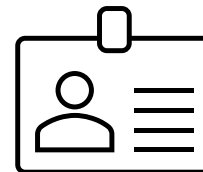
Scope: independent practice of **massage therapy**; include work on complex cases

- 7,619 licensees, 187 apprentices
- Utah’s license and requirements are common nationwide (only 5 states differ)*

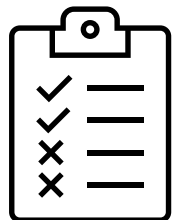


600 hours in an approved massage program

OR



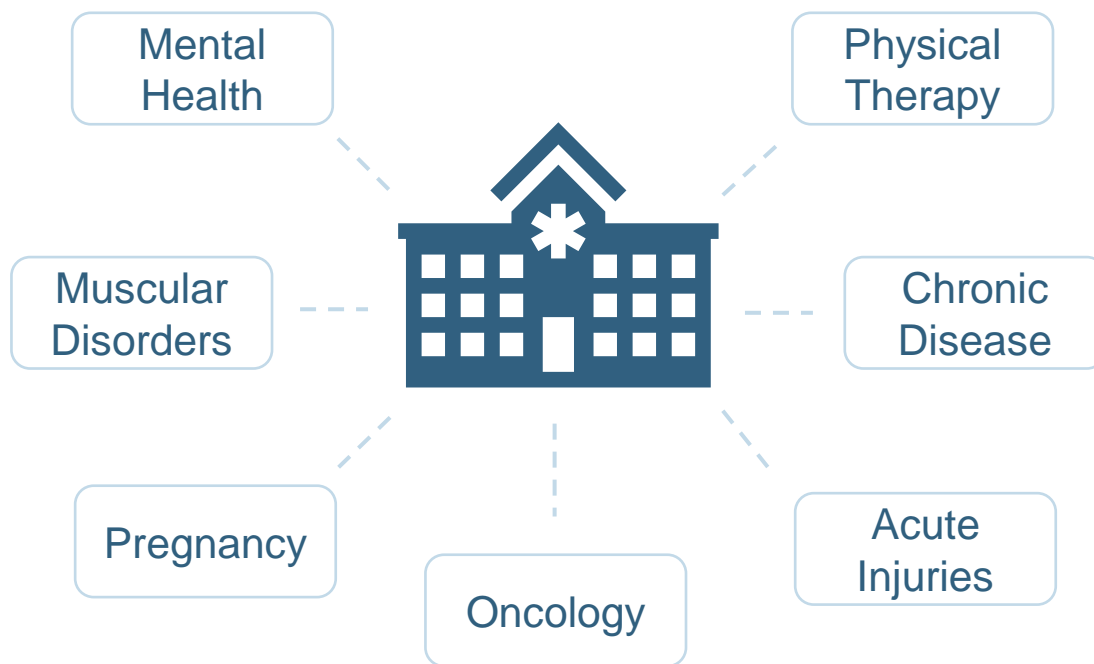
1,000 hours as a licensed apprentice



MBLEx (national exam)

* An applicant may also complete 150 hours of a school program and 150 hours as an assistant-in-training to become a Massage Assistant; Utah also has an apprenticeship path for Massage Therapist which is rare

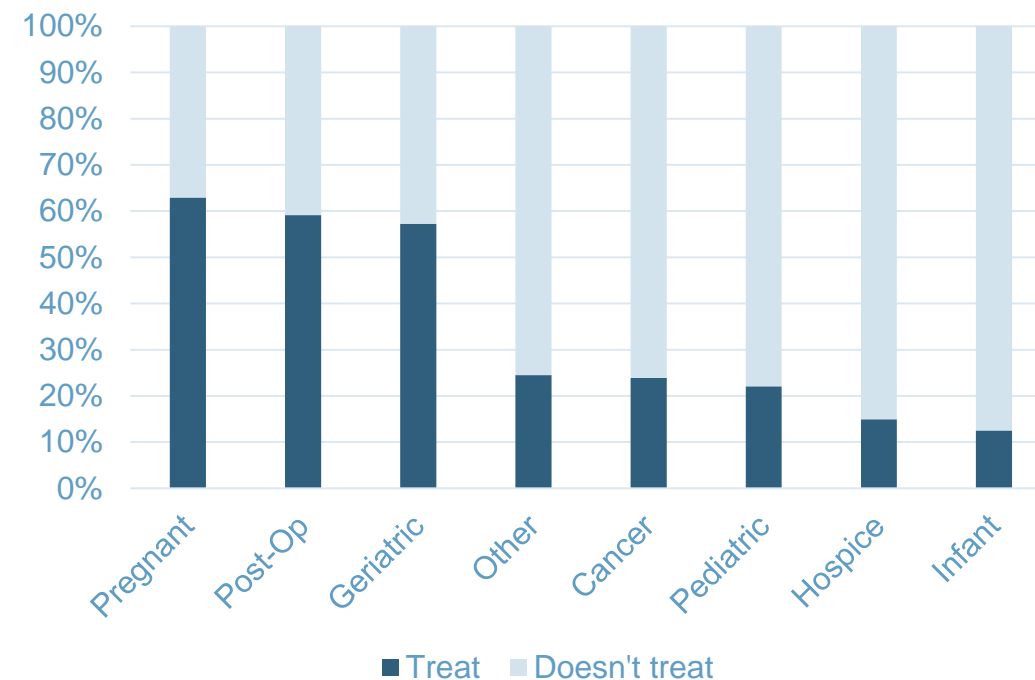
Findings: Medical massage is a promising adjunct to traditional healthcare in multiple settings



*Preliminary studies indicate that massage may beneficially affect **depression and anxiety** symptoms, **immune response**, and **fatigue in cancer patients**²*

Over half of current licensees report **regularly treating vulnerable clients**, and have training specific to that population¹

Of those licensees treating vulnerable clients:



1. OPLR's Massage Therapy Survey. Data based on the 494 (58%) of the sample indicating they work with at least one of the listed vulnerable groups. The bar chart and percentages are limited to the % of the sample treating vulnerable clients, not the entire sample 2. Rapaport, M.H., Schettler, P.J., Larson, E.R., Carroll, D., Sharenko, M., Nettles, J. and Kinkead, B. (2018). Massage Therapy for Psychiatric Disorders. FOCUS, 16(1), pp.24–31. doi:https://doi.org/10.1176/appi.focus.20170043.

Findings: The therapist-client relationship lends itself to multiple forms of harm

Massage context:

- 1:1 in closed room
- Partially undressed
- Manual touching
- May include high-risk groups:
 - Pregnancy
 - Post-injury
 - Cancer
 - Hospice

Therapist

HARM

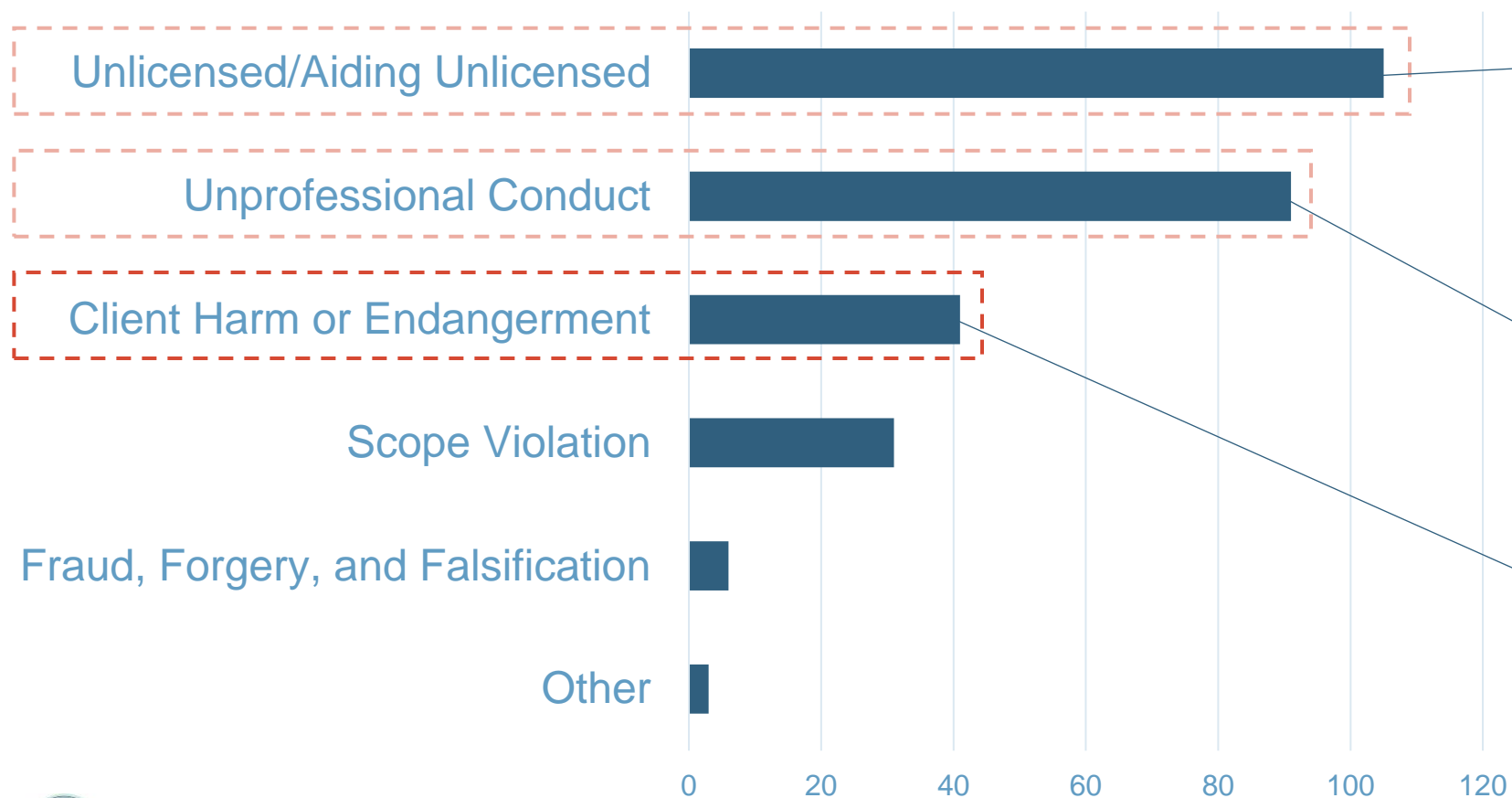
Client

Potential Harms:

1. Physical harm to client via incompetence or negligence
 - Bruising, broken rib, muscle tear
2. Sexual harm to client
 - Sexual assault, touching (non-consensual)
3. Other illegal activities posing as massage
 - Human trafficking, sex trafficking, commercial sex work (consensual)
4. Harm to therapist by client

Findings: Sexual misconduct and illegal activities represent the greatest potential for harm within massage

DOPL Substantiated Complaints (2017-2022)¹



25% of complaints involved some outside law enforcement action (e.g., search warrants,)²

Include violations of ethical and professional conduct standards (i.e., draping and privacy)

39/41 are sexual misconduct complaints

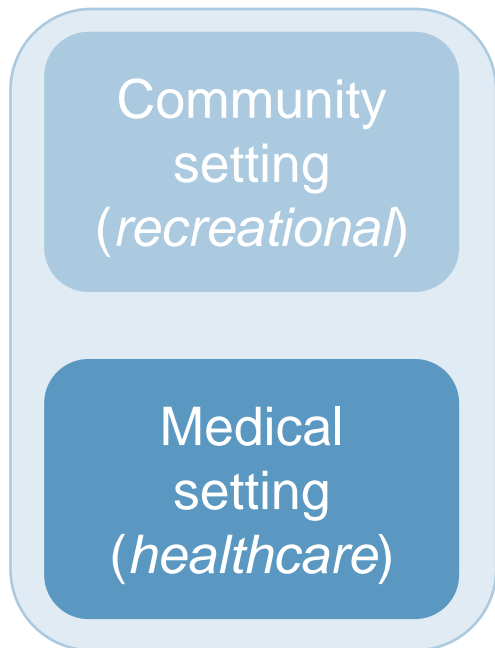
1. DOPL Complaint Information 2. Investigator Case Notes Analysis. Investigators filled out additional information on a stratified random sample of 100 substantiated complaints filed between 2014 and 2022. In 12 of 49 randomly selected cases regarding unauthorized/aiding unlicensed practice, there was police involvement

Recommendation 1: Maintain the two-tiered license to meet diverse regulatory goals

Massage Segment

Regulatory Goals

Licensing Structure



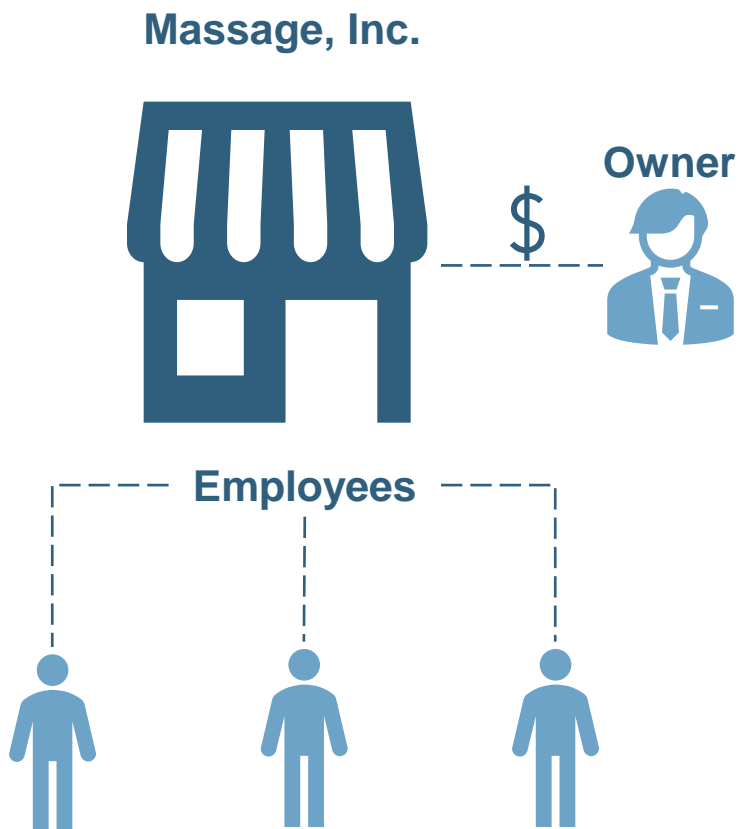
- Reduce unnecessary **barriers to entry**
- Maintain basic **safety of clients**
- Discourage licensee **sexual misconduct**
- Ensure proper training to safely treat **vulnerable populations**
- Maintain potential for **reimbursement**
- Discourage licensee **sexual misconduct**



Illegal

- Maintain enforcement of **unlawful and unethical behavior**
- Discourage use of massage licensure as a façade for **illegal activities**

Recommendation 2: Enact massage establishment regulation to hold owners accountable for illegal acts



Create massage establishment registry:

- **Owners/employers** must:
 - 1) Submit fingerprints, background check,
 - 2) Sign attestation re: illegal activities (*e.g., no human trafficking, sex advertising, unlicensed practice*),
 - 3) Follow appropriate practice standards (*e.g., display license*)
- **Revoke business registration** for non-compliance & notify landlord, local government, and law enforcement
- **Exemption for solo practice** (w/ no employees or storefront)

Rationale:

- **Maintain low-barrier assistant** license for legitimate practitioners
- **Differentiates legitimate** from illegitimate massage businesses
- Holds **owner of record accountable** (not employees) where appropriate
- **Encourages supervision** of employees and physical setting; disincentives sexual misconduct, illegal activities
- ~20 states have a similar massage establishment license

Recommendation 3: Increase safety via improved information, communication, and therapist education

Accountability & Information:

- Join the national **Massage Therapist Licensing Database** (MTLD) for interstate information
- Participate in **FBI Rap Back** for ongoing criminal database checks
- Require a **photo of a licensee**, either to add to DOPL's licensing database, or to display on their license
- Provide DOPL teams with **human trafficking training** and system to identify **red flags** in licensing process

Communication:

- Require **disclosure** of license number, DOPL resources, and standards of care to client
- Require an **intake form** that includes a patient's relevant medical history to prevent harm to vulnerable clients (e.g., post-injury, cancer) and ensure massage assistant licensees operate within scope

Education:

- Alter educational requirements to be more **aligned with safety issues** in this space (e.g., contraindications, ethics, consent)
- Require **massage therapy instructors** to be licensed massage therapists (or other exempted licensed occupations)
- Reduce **number of apprentices** per supervisor from 6 to 3 and **set a 2-year maximum** for license



Agenda

- Cosmetology
- Massage Therapy
- **Building Inspectors**

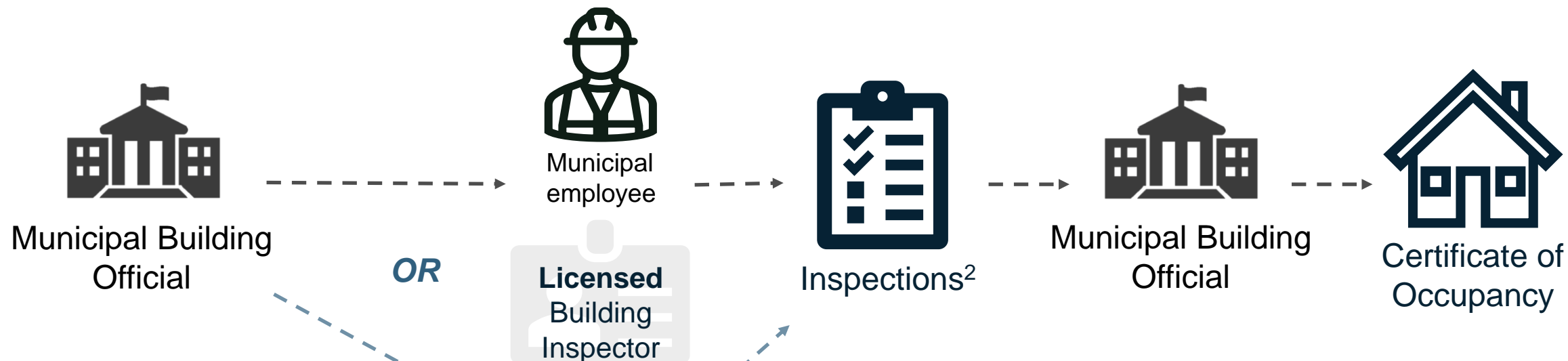


Problem: Variability in code enforcement creates uncertainty for builders; can increase time and cost

- Building inspection requires **extensive technical knowledge** and judgment to apply code across **varied building contexts**—it is not always ‘black and white’¹
- Most **inspections are completed on time**, despite an aging workforce and difficulty filling open positions
 - This discrepancy may exacerbate issues of variability in code enforcement
- Builders assert that **variability in enforcement** across municipalities and inspectors **leads to uncertainty** which drives up **time and cost of housing**¹
 - There is no mechanism to facilitate the consistency of code interpretation between municipalities beyond that which is self-imposed
- Utah’s state building inspector license **is redundant** with oversight by the building official and municipality
 - Most building inspectors are local government employees under the supervision of a building official; all others are contracted with a building official
- The current **municipal appeals process may not fully address** immediate needs of builders, nor does it address variability in code enforcement between inspectors¹
 - While municipalities do have an appeals process, most builders avoid the process as too slow and costly, simply absorbing the cost of required changes even when beyond code requirements



Findings: Cities have oversight over building inspectors through the building official



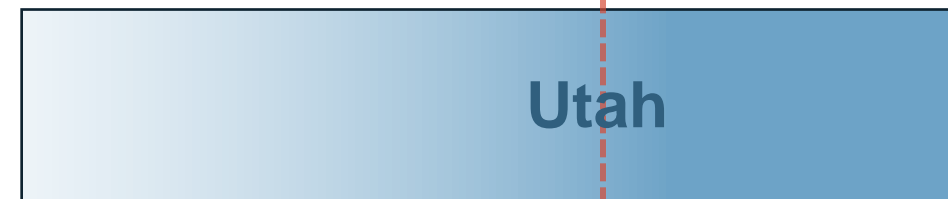
Of building inspectors who took our survey³:

- **84%** are city/county employees
- **19%** are third-party

- Municipal building officials maintain **oversight of building inspectors¹** (as either employees or via contracts)
- Building officials **maintain authority** to issue permits and certificates of occupancy regardless of who does the inspection

Findings: There is variation in how states regulate inspectors; Utah’s private/public balance is good

License, Certification, or Registry? ¹	Number of States	Examples
No	23	<p><u>Alabama, Colorado, Indiana</u></p> <p><u>Georgia</u>: No license, but state law does require inspectors to be ICC-certified or have a trade license</p>
For some inspectors	5	<p><u>Texas</u>: has a registration for third-party inspectors who do industrialized housing inspections and a license for plumbing inspectors</p>
Yes	22	<p><u>Ohio</u>: Requires years of trade experience, completion of a state course, and ICC or NCPCCI certification</p>



PRIVATE²

Efficiency
Effectiveness

PUBLIC²

Equity
Accountability

Utah’s current system increases efficiency without compromising accountability

“Localities that **privatize the building inspection industry too much begin to see problems** with permit holders shopping for friendly inspectors and private inspectors only taking on profitable jobs and leaving small jobs to cities.”

- Dr. Jeroen van der Heijden

1. OPLR Policy Scan 2. Jeroen van der Heijden, “Privatisation of building code enforcement: a comparative study of regimes in Australia and Canada,” *International Journal of Law in the Built Environment* (2010). The quote is a paraphrased idea from a conversation between OPLR and Dr. Jeroen van der Heijden in May of 2024.

Findings: Low pay, obscurity, and a lack of training programs make hiring difficult

Building officials describe an industry struggling to attract candidates and fill open positions¹

- The average age of inspectors is 50²
- 26% plan to retire in the next five years
- 61% plan to retire in the next 15 years³

Why?

Lack of Training Opportunities



Low Pay⁴



Obscurity of the Industry ?

Cities and third-party firms bear much of the **initial training** burden.

Currently, a portion of the permit surcharge fee is appropriated for building inspector **continuing education**.

Findings: Building inspector timeliness is not a major constraint, but variability in enforcement may be

100%

of cities surveyed by the ULCT have an average inspection time of less than three days.¹

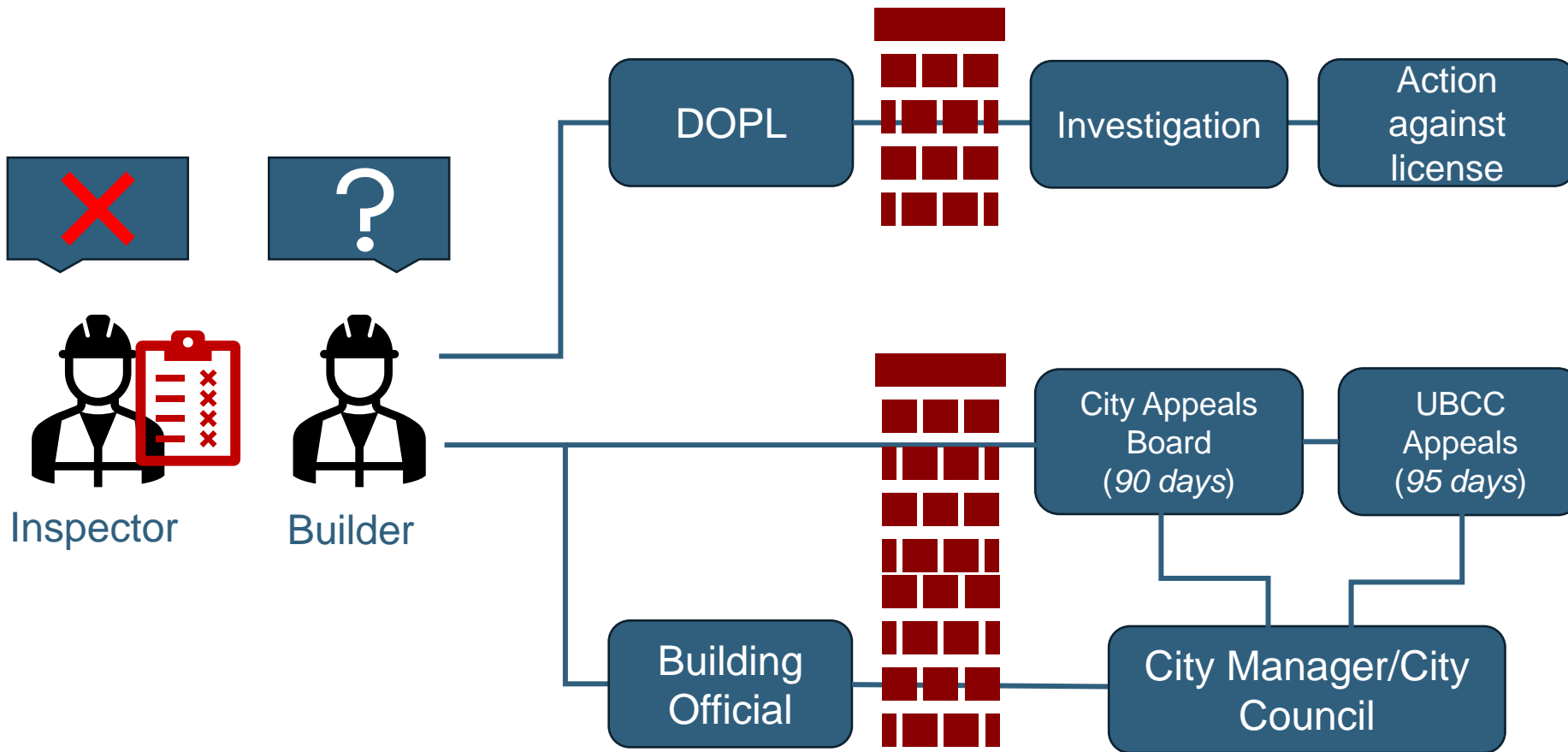
*Despite a perceived workforce shortage, most inspections are **done on time**. However, this may mean inspectors are doing **more inspections in a day** than is ideal.*

Utah homebuilders experience²:

- ***Frustrations with the entire process*** from land entitlement, plan review, permit, inspections, to the certificate of occupancy
- Variability in code enforcement between both ***cities*** and ***individual inspectors***
- Lack of a ***process to appeal*** code enforcement decisions that is quick enough to be worth pursuing



Findings: Utah needs better mechanisms to improve accountability and reduce variation in enforcement



DOPL receives few complaints¹, and **does not investigate issues of code interpretation**, only licensure (e.g., scope of practice, unlicensed practice)²

Appeals processes are viewed by builders as **too slow, unlikely to be impartial, and rarely utilized**

Analysis: Consistency in code enforcement matters because small inefficiencies multiply quickly

*A stylized example shows why **small inefficiencies** in building inspection processes can have a **large economic impact** on the state:*

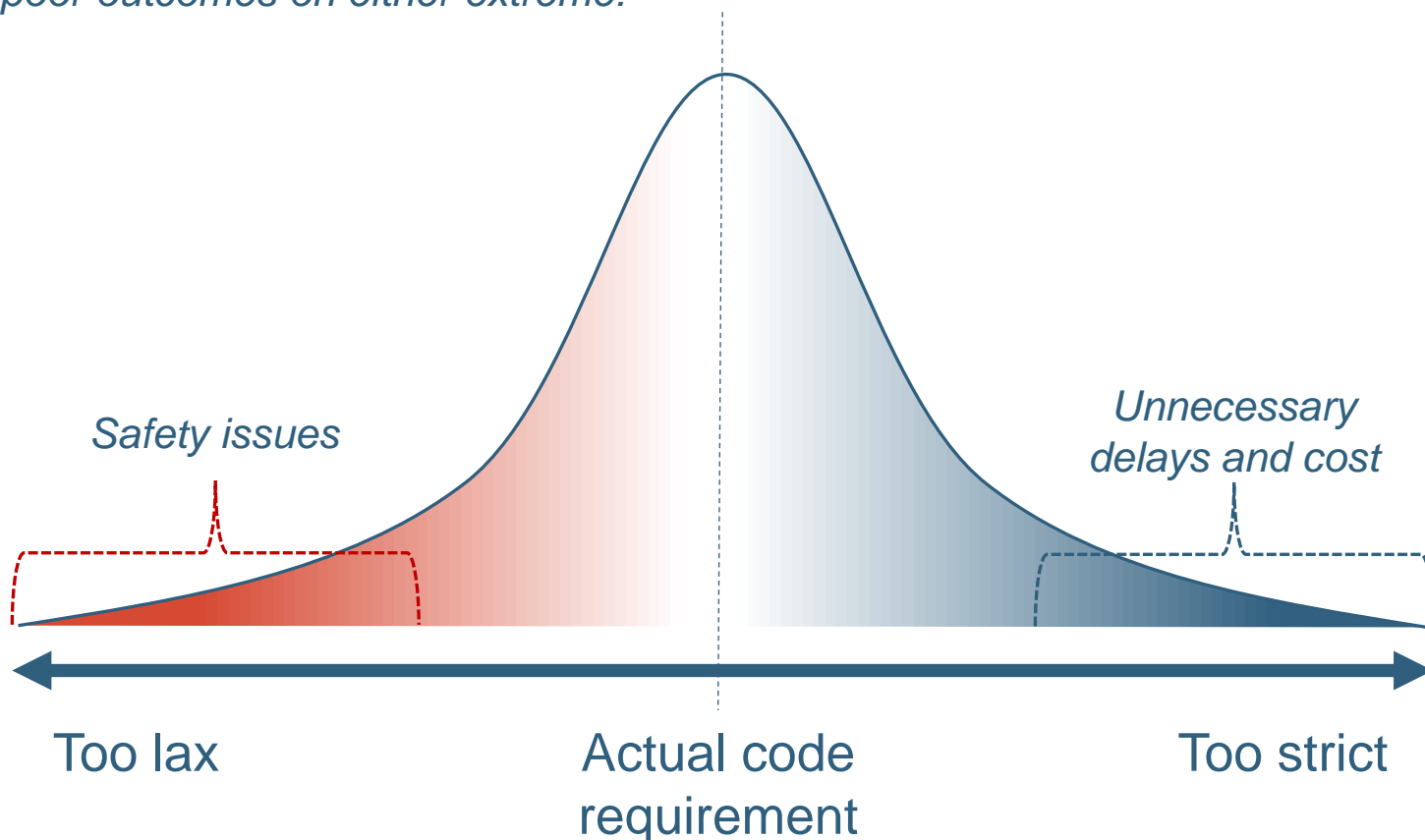


ILLUSTRATIVE EXAMPLE ONLY



Objective: Ensure that building codes are enforced consistently and objectively statewide

Variability in code enforcement yields poor outcomes on either extreme:



Reducing variability in code enforcement will **improve safety and reduce wasted time and money** in the building process

Recommendation: Change the level of licensure; address variability and workforce issues

1. **Change the level of licensure** from the individual inspector to the building official and 3rd party firm
 - Eliminate DOPL's state-level building inspector license and establish a building official and 3rd party firm license
 - Define all inspectors and building officials as 'ICC certified' in statute (mirroring current licensure qualifications)
 - Require that building officials use only ICC certified individuals *and* properly supervise inspectors, ensuring they apply code consistently and transparently, not exceeding scope or improperly enforcing code
2. **Create a feedback mechanism** to increase uniformity of code interpretation
 - Empower the UBCC to collect stakeholder feedback (from builders, inspectors, building officials) on code enforcement issues to inform education funding in inspection and building industries
 - Require the UBCC to use collected data to provide feedback to stakeholders (buildings, inspectors, building officials) to ensure consistency across inspectors and municipalities
3. Consider **increasing the supply of building inspectors** through broadened definition and training
 - Consider adding other qualified licensees as inspectors as well (e.g., master electricians/plumbers) to increase supply of building inspectors
 - Establish a voluntary certification for home inspectors which requires ICC certification
 - Consider increased training opportunities for building inspectors through permit surcharge



APPENDIX



Progress to date

Primary Data Collection

OPLR Survey of Licensees¹

- Cosmetology
 - 4,000 total respondents
 - 750 open-ended comments
- Massage Therapy
 - 900 total respondents
 - 260 open-ended comments
- Building Inspectors
 - 240 total respondents
 - 90 open-ended comments

Stakeholder Listening Tour

Expert & Leader Interviews (50+)

Industry Focus Groups (15)

- 70+ total attendees
- 500+ minutes of recordings
- 4 site visits to training institutions and workplaces

Associations

National Groups

- National Interstate Council of State Boards of Cosmetology (NIC)
- Federation of State Massage Therapy Boards (FSMTB)
- Associated Bodywork & Massage Professionals (ABMP)
- American Massage Therapy Association (AMTA)

State Groups

- American Massage Therapy Association (AMTA) Utah Chapter
- Utah Beauty School Owners Association (UBSOA)
- Utah Chapter of the International Code Council (UCICC)
- Utah Building Code Commission (UBCC)
- Utah Home Builders Association (UHBA)
- Utah League of Cities and Towns (ULCT)

Academic & Policy Review

Interstate Law Review

- Policy data on 10+ license types across U.S. jurisdictions

Policy Landscape Review

- Legislative history, international approaches, case studies

Literature Review

- 150+ relevant resources (e.g., academic articles) identified
- Evidence on the impact of various regulations on consumer access & safety
- Research on cosmetology, massage therapy, and building inspection workforces & policies

