

Written Testimony on H.588

Lila Rees

Licensed Tattoo Artist

Former Tattoo Advisor Office of Professional Regulation (Vermont)

Owner, Rock City Tattoo

I reviewed H.588. Tattooing is not specifically addressed, but tattoo artists are regulated by the Office of Professional Regulation (OPR), and the bill's language regarding rescinding licenses obtained through fraudulent or deceptive procurement applies to tattooing.

I want to note one real-world issue this provision relates to.

Several years ago, I was involved in an OPR case where an applicant for a tattoo license admitted to falsifying required apprenticeship hours. The dates submitted showed an impossible timeframe. OPR declined to rescind the license, stating that because it had already been issued, the failure to catch the discrepancy was considered an internal oversight. (*This was not an isolated incident, but I cite one example for clarity.*)

The clarification in H.588 regarding OPR's authority to rescind licenses obtained through fraud would likely prevent that outcome.

However, for tattooing, this enforcement authority highlights a broader problem. Vermont does not require meaningful front-end verification of competency or apprenticeship completion prior to licensure. As a result, regulation is largely reactive, addressing issues only after a license has already been issued.

I submit this testimony to note that while H.588 closes a rescission loophole, tattooing continues to be regulated without entry-level standards that would prevent these situations in the first place.

Thank you for the opportunity to provide testimony, and I'm always happy to answer any questions.