

ALASKA STATE LEGISLATURE

LEGISLATIVE BUDGET AND AUDIT COMMITTEE

Division of Legislative Audit



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SUMMARY OF: A Sunset Review of the Department of Commerce, Community, and Economic Development, Board of Barbers and Hairdressers, October 14, 2004

PURPOSE OF THE REPORT

In accordance with Title 24 and Title 44 of the Alaska Statutes, we have reviewed the activities of the Board of Barbers and Hairdressers (BBH). As required by AS 44.66.050(a), the legislative committees of reference are to consider this report during the legislative oversight process involved in determining if the board should be reestablished. Currently, AS 08.03.010(c)(4) states that the board will terminate on June 30, 2005. If the legislature does not extend the termination date for the board, BBH will have one year to conclude its administrative operations.

REPORT CONCLUSIONS

In our opinion, the termination date for the Board of Barbers and Hairdressers (BBH) should be extended. BBH is effectively regulating the various professions under its purview – barbers, hairdressers, estheticians, manicurists, body piercers, and tattooists. The board is safeguarding the public interest by ensuring individuals have met the minimum educational and experience requirements before being licensed.

BBH serves a public purpose and has demonstrated an ability to conduct its business in a satisfactory manner. The board continues to make changes to regulations to improve the effectiveness of its oversight. Since the last sunset review, BBH has developed a new set of regulations related to tattooists and body piercers.

Under Alaska Statute 08.03.010(c)(4), the Board of Barbers and Hairdressers will be terminated on June 30, 2005. If this termination date is not extended, the board has a one-year period to administratively conclude its affairs. We recommend the Legislature extend the board's termination date to June 30, 2011.

FINDINGS AND RECOMMENDATION

1. The legislature should consider implementing legislation to allow the board to delegate administration of the State's practical examination to training schools or apprentice supervisors.

To be licensed as a barber, hairdresser, esthetician, or an instructor, an individual must successfully complete two types of examinations. The first is a written examination which is objectively scored and covers subject matter that is central to the primary public policy rationale for licensing the professions involved – licensees have access to, and must know how to safely use, the various chemicals involved in hair care and cosmetology treatments. The second examination is a practical examination which requires the applicant to demonstrate they have mastered the various skills related to the license they are seeking.

The legislature last extended the termination date of the Board of Barbers and Hairdressers (BBH) in 2001. After its deliberations regarding the extension legislation (SB 53), the Senate Labor and Commerce Committee developed the following statement of intent:

The Legislature requests that the Board carefully consider the option of self-testing by the various vocations regulated by the Board and that it consider a pilot program of self-testing. The Legislature specifically requests the Board to research and investigate the results of self-testing in Washington and Oregon.

In response to this legislative intent BBH researched the feasibility of, and developed draft regulations to implement, a delegated testing program for the State's practical examinations for barbers, hairdressers, estheticians, and instructors. BBH did develop draft regulations to implement a delegated, self-testing program for the practical examination covering four of the licenses issued by the board.

When BBH forwarded the proposed regulations to the Department of Law for review and approval, the board was advised it did not have the necessary statutory authority to implement such a change.

The current board does not support this revision to the examination process. Therefore, we suggest the legislature implement another course of action. The Division of Occupational Licensing should, after consulting with the Department of Law, provide the legislature with suggested statutory language that not only give BBH the authority to delegate the administration of the practical examination, but also mandates the board to take such action.

November 1, 2004

Members of the Legislative Budget
and Audit Committee:

In accordance with the provisions of Title 24 and Title 44 of the Alaska Statutes, the attached report is submitted for your review.

DEPARTMENT OF COMMERCE, COMMUNITY,
AND ECONOMIC DEVELOPMENT
BOARD OF BARBERS AND HAIRDRESSERS

October 14, 2004

Audit Control Number

08-20029-05

This audit was conducted as required by AS 44.66.050 and under the authority of AS 24.20.271(1). Alaska Statute 44.66.050(c) lists criteria to be used to assess the demonstrated public need for a given board, commission, agency, or program subject to the sunset review process. Currently under AS 08.03.010(c)(4), the Board of Barbers and Hairdressers is scheduled to terminate on June 30, 2005. If the legislature takes no action to extend the termination date, the board would be allowed one year in which to conclude its administrative operations. We recommend that the legislature extend the board's termination date to June 30, 2011.

The sunset review was conducted in accordance with generally accepted government audit standards. Fieldwork procedures utilized in the course of developing this report are set out in the Objectives, Scope, and Methodology section.

Pat Davidson, CPA
Legislative Auditor

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OBJECTIVES, SCOPE, AND METHODOLOGY

In accordance with Title 24 and Title 44 of the Alaska Statutes, we have reviewed the activities of the Board of Barbers and Hairdressers (BBH). As required by AS 44.66.050(a), the legislative committees of reference are to consider this report during the legislative oversight process involved in determining if the board should be reestablished. Currently, AS 08.03.010(c)(4) states that the board will terminate on June 30, 2005, and will have one year from that date to conclude its affairs. If the legislature does not extend the termination date for the board, BBH will have one year to conclude its administrative operations.

Objectives

The three central, interrelated objectives of our report are:

1. To determine if the termination date of BBH board should be extended.
2. To determine if BBH is operating in the public interest.
3. To determine if the board has exercised appropriate regulatory oversight of licensed barbers, hairdressers, estheticians, manicurists, instructors, tattooists and cosmetic colorists, and body piercers.

The assessment of the operations and performance of the board was based on criteria set out in AS 44.66.050(c). Criteria set out in this statute relates to the determination of a demonstrated public need for the board.

Scope and Methodology

Under the direction and supervision of the Division of Legislative Audit, another auditor conducted most of this review. We followed professional standards to determine that the other auditor was independent and their work was competent and sufficient.

The major areas of our review were board proceedings, licensing, complaint investigation, and resolution functions for fiscal years ending June 30, 2001 through 2004. During the course of our examination we reviewed and evaluated the following:

- Applicable statutes and regulations related to the licensing of barbers, hairdressers, estheticians, manicurists, instructors, tattooists and cosmetic colorists, and body piercers.
- Minutes of meetings of the Board of Barbers and Hairdressers.

- Annual reports issued by the Board of Barbers and Hairdressers.
- Complaints filed with the Department of Commerce, Community, and Economic Development, Division of Occupational Licensing, Office of the Ombudsman, and the Alaska Human Rights Commission.
- Reading and correspondence files maintained with the Department of Commerce, Community, and Economic Development, Division of Occupational Licensing.
- Interviews with employees of the Department of Commerce, Community, and Economic Development, Division of Occupational Licensing.
- Review of financial records related to the revenues generated and the operating costs incurred by BBH.
- Files related to applicants for, and holders of, licenses issued by BBH.

ORGANIZATION AND FUNCTION

The Board of Barbers and Hairdressers is established under the authority of AS 08.13.010. The six member board is appointed by the governor to four-year terms. Terms are staggered in order to promote continuity and enhance historical perspective.

The board is made up of two barbers, two hairdressers (one of whom must also be a licensed esthetician), an individual licensed to practice either body piercing or tattooing and permanent cosmetic coloring,¹ and one public member.

The board evaluates the qualifications of candidates, administers examinations, issues certificates and licenses to practice, promulgates rules of professional conduct, and takes disciplinary action.

Licensing requirements

In general, under state law, a person may not practice barbering, hairdressing, esthetics, piercing or tattooing/permanent cosmetic coloring without a license, temporary permit, temporary license, or student permit issued by the board. All such practice must take place in a licensed shop or school licensed under terms set by statute and the board. The board also regulates school operations related to barbering, hairdressing, or esthetics.

The Department of Commerce, Community and Economic Development, Division of Occupational Licensing

The Department of Commerce, Community and Economic Development, Division of Occupational Licensing provides administrative and investigative assistance to the Board of Barbers and Hairdressers. Administrative assistance includes budgetary services and functions such as collecting fees, maintaining files, receiving and issuing application forms, and publishing notices of examinations and meetings.

¹ AS 08.13.220(14) define “tattooing and permanent cosmetic coloring” as:
the process by which the skin is marked or colored by insertion of nontoxic dyes or pigments into the dermal layer of the skin so as to form indelible marks, figures, or decorative designs for nonmedical purposes.

Board of Barbers and Hairdressers (As of June 30, 2004)
<u>Professional Members</u>
Diana L. Straub, Chair Hairdresser/Esthetician
Charlette Lushin, Barber
Debra J. Long, Hairdresser
Larry Allen Ungerecht, Tattooist/Body Piercer/Permanent Cosmetic Colorist
Vacant, Barber
<u>Public Member</u>
Joylene Marrs

Alaska Statute 08.01.065 mandates the Department of Commerce, Community and Economic Development, with the concurrence of the Board, adopt regulations to establish the amount and manner of payment of application fees, examination fees, license fees, registration fees, permit fees, investigation fees, and all other fees as appropriate for the occupations covered by the statute.

Alaska Statute 08.01.087 empowers the Division of Occupational Licensing (OccLic) with the authority to act on its own initiative or in response to a complaint. OccLic may:

1. Conduct an investigation if it appears a person is engaged or is about to engage in a prohibited professional practice.
2. Bring an action in Superior Court to enjoin the act.
3. Issue subpoenas for the attendance of witnesses and records.

REPORT CONCLUSIONS

In our opinion, the termination date for the Board of Barbers and Hairdressers (BBH) should be extended. BBH is effectively regulating the various professions under its purview – barbers, hairdressers, estheticians, manicurists, body piercers, and tattooists. The board is safeguarding the public interest by ensuring individuals have met the minimum educational and experience requirements before being licensed.

BBH serves a public purpose and has demonstrated an ability to conduct its business in a satisfactory manner. The board continues to make changes to regulations to improve the effectiveness of its oversight. Since the last sunset review, BBH has developed a new set of regulations related to tattooists and body piercers.

Under Alaska Statute 08.03.010(c)(4), the Board of Barbers and Hairdressers will be terminated on June 30, 2005. If this termination date is not extended, the board has a one-year period to administratively conclude its affairs. We recommend the Legislature extend the board's termination date to June 30, 2011.

Implementation of our recommendation would require the legislature to exercise some discretion permitted by state law. Alaska Statute 08.03.020(c) provides for the following:

*A board scheduled for termination ... may be continued or reestablished by the legislature for a period not to exceed four years **unless the board is continued or reestablished for a longer period** ... [emphasis added]*

Two factors influence our recommendation that the legislature extend the board to June 30, 2011. First, the board has operated effectively and in the public's interest over the past four years. Secondly, this extension would work towards smoothing out the number of boards and commissions that come under sunset in a particular year. Typically, there are four to six boards and/or commissions scheduled for a legislative sunset review; however, in 2005 there are 12 entities scheduled for sunset. Nonstandard extension dates will allow for a more even distribution of organizations going through the sunset process in any given year.

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FINDINGS AND RECOMMENDATION

Recommendation No. 1

The legislature should consider implementing legislation to allow the board to delegate administration of the State's practical examination to training schools or apprentice supervisors.

To be licensed as a barber, hairdresser, esthetician, or an instructor, an individual must successfully complete two types of examinations. The first is a written examination² which is objectively scored and covers subject matter that is central to the primary public policy rationale for licensing the professions involved – licensees have access to, and must know how to safely use, the various chemicals involved in hair care and cosmetology treatments. The second examination is a practical examination which requires the applicant to demonstrate they have mastered the various skills related to the license they are seeking.³

The legislature last extended the termination date of the Board of Barbers and Hairdressers (BBH) in 2001. After its deliberations regarding the extension legislation (SB 53), the Senate Labor and Commerce Committee developed the following statement of intent:

The Legislature requests that the Board carefully consider the option of self-testing by the various vocations regulated by the Board and that it consider a pilot program of self-testing. The Legislature specifically requests the Board to research and investigate the results of self-testing in Washington and Oregon.

In response to this legislative intent BBH researched the feasibility of, and developed draft regulations to implement, a delegated testing program for the State's practical examinations for barbers, hairdressers, estheticians, and instructors. Such action would have essentially delegated the responsibility for administering the practical examination to the cosmetology/barber school or instructor involved with the student applicant or apprentice seeking licensure.

² The written examination for barbers is the National Barber-Stylist Test, for hairdressers it is the National Cosmetology Test, for estheticians it is the National Esthetician Test, while instructors must pass the National Teacher's Test. All examinations are developed and sponsored by the National Interstate Council of State Boards of Esthetics.

³ For example, according to state regulations the practical examination for a barber's license will involve demonstrating skills involved with: permanent waving; virgin tint; bleach touch-up, and highlighting; haircutting, hair styling, and drying (not including finger waves, pin curls, and rollers); and, shaving. Part of the evaluation involves an assessment of the "[s]anitation, comfort, and protection of the model..." on which the skills are demonstrated.

Such an arrangement would put instructors and schools in a situation where they could be biased in favor of their students, possibly to the detriment of the public. If incompetent individuals are given passing scores the public might be at greater risk. However, the enhanced accessibility to the profession for applicants would offset any potential harm to the public. Rather than having to travel to a central location to take the practical examination under the supervision of the board, individuals can stay in their home communities and take the examination in front of their instructor (who must be licensed by passing appropriate examinations).

Delegated examinations can still be monitored on a “spot-check” basis

As referred to in the statement of intent, the State of Oregon has implemented a delegated examination program. An administrator in that state reported that they are confident the competency of individuals receiving a license has not been unduly compromised. That state’s licensing board still observes, on a spot-check basis, the examination process used by the schools with delegated authority. Such an observation program promotes consistency between various schools’ examination procedures and test contents required by the Oregon board.

Likewise, we would recommend adoption of any such delegated examination procedures by BBH to include provisions allowing board representatives to monitor delegated examinations with little or no notice. BBH should also have authority to suspend the testing delegation for given schools or instructors in instances where it determines the guidelines for examination are not being objectively followed.

Delegation of testing would be less expensive with minor impact to public health

An additional benefit of such delegation would be to spare BBH the expense of arranging a site and proctors to oversee examinations – which in recent years has been done from eight to 11 times a year. Oregon has found the delegation of the practical examination to be cost-effective, with no discernable impact on public health and safety.

In the licensing of barbers, hairdressers, and estheticians, it is the objective written test, which would still be controlled and administered by the board, that provides the most substantial part of public protection. The practical examination is more subjective in nature and although “*sanitation, comfort, and protection of the model*” is important – these are factors, which if not consistently accomplished by a licensed individual, will soon enough be compensated for by the marketplace, with minimal harm to public health and safety.

Department of Law advised BBH it lacked authority to delegate testing

As mentioned previously, BBH did develop draft regulations to implement a delegated, self-testing program for the practical examination covering four of the licenses issued by the board. When BBH forwarded the proposed regulations to the Department of Law for review

and approval, the board was advised it did not have the necessary statutory authority to implement such a change.

The current board does not support this revision to the examination process. Therefore, we suggest the legislature implement another course of action. The Division of Occupational Licensing should, after consulting with the Department of Law, provide the legislature with suggested statutory language that not only gives BBH the authority to delegate the administration of the practical examination, but also mandates the board to take such action.

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ANALYSIS OF PUBLIC NEED

The following analysis of board activities relates to the public-need factors defined in AS 44.66.050(c). These analyses are not intended to be comprehensive, but address those areas we were able to cover within the scope of our review.

The extent to which the board, commission, or program has operated in the public interest.

Alaska Statute 08.13.040 requires that the Board of Barbers and Hairdressers administer the examination semiannually. The board has met this requirement during the period under audit, administering up to seven different examinations, approximately eight times a year during the period FY 01 through FY 04.

The board has successfully implemented changes and modifications to regulations and statutes that govern the fields covered by the board. The new modifications to the statutes and regulations include:

1. Adoption and implementation of regulations to put in place the new state laws related to tattooing, body piercing, and permanent color cosmetology.
2. Increasing the minimum theory training requirements from 110 hours to 130 hours for tattooing and permanent cosmetic coloring practitioners.
3. Limiting tattooists to two apprentices for every licensed practitioner in a given shop.
4. Requiring body piercers and tattooists to submit copies of current blood-borne pathogens and cardiopulmonary resuscitation (CPR) cards for license renewal.

The extent to which the operations of the board, commission or agency program has been impeded or enhanced by existing statutes, procedures, and practices that it has adopted, and any other matter, including budgetary, resource, and personnel matters.

Currently, as in the past, the board is having problems maintaining full membership. The board has operated with one barber-designated seat vacant since October 2002. Likewise, the public member seat was vacant from October 2000 until April 2003, a period of 2 ½ years. The lack of board members impacts the board's ability to effectively regulate the professions. It also increases the risk of not having a quorum if a member is absent from a meeting.

Under AS 08.01.065(c), the Department of Commerce, Community, and Economic Development, Division of Occupational Licensing (OccLic), must “*establish fee levels ... so*

that the total amount of fees collected for an occupation approximately equals the actual regulatory costs for the occupation.”

Licensing and renewal fees for licensees were increased in fiscal year 2001 to \$135 for practitioners and \$175 for shop owners. This increase was necessary at the time to ensure that the deficit was repaid and the total fees collected approximated the overall regulatory costs for the occupation. Based upon the schedule presented below, it appears that licensing fees are adequate in order to cover regulatory costs of the profession.

State of Alaska Board of Barbers and Hairdressers Schedule of Revenues and Expenditures FY 02 - FY 04 (Unaudited)			
	<u>FY 04</u>	<u>FY 03</u>	<u>FY 02</u>
Revenue	\$ <u>566,200</u>	\$ <u>182,900</u>	\$ <u>532,200</u>
Direct Expenditures			
Personal Services	122,100	109,200	84,100
Travel	5,700	4,400	7,000
Contractual	34,800	53,000	25,500
Supplies	<u>200</u>	<u>500</u>	<u>200</u>
Total Direct Expenditures	162,800	167,100	116,800
Indirect Expenditures	<u>229,300</u>	<u>190,000</u>	<u>177,400</u>
Total Expenditures	392,100	357,100	294,200
Net Income (Loss)	<u>174,100</u>	<u>(174,200)</u>	<u>238,000</u>
Beginning Cumulative Surplus (Deficit)	(39,800)	134,400	(103,600)
Ending Cumulative Surplus (Deficit)	\$ <u>134,300</u>	\$ <u>(39,800)</u>	\$ <u>134,400</u>

The extent to which the board, commission, or agency has recommended statutory changes that are generally of benefit to the public interest.

We saw no evidence where the Board of Barbers and Hairdressers testified before any legislative committee on any legislation except the action taken to extend the termination date of the board.

The extent to which the board, commission or agency has encouraged interested persons to report to it concerning the effect of its regulations and decisions on the effectiveness of services, economy of service, and availability of services that it has provided.

The location, date, and time of upcoming board meetings and notices of proposed changes in regulations are published in the *Anchorage Daily News*, the board's internet website, and the State's on-line public notice internet website. The State also offers a subscription service whereby the State will e-mail the subscriber requested public notices. Meeting minutes and agendas indicate time was set aside for the board to take public comment. Board minutes also reflected public participation throughout the meeting. Proposed regulations are circulated to those affected by the proposed regulations through professional trade journals, public notice advertisement, or direct mail correspondence from the Division of Occupational Licensing.

The extent to which the board, commission, or agency has encouraged public participation in the making of its regulations and decisions.

Public notices of proposed regulations are published in major newspapers. Meetings are adequately advertised, and time is set aside for public testimony. There is evidence of extensive participation from the public in the development of board regulations related to the newest professions – tattooists and body piercers.

The board's increase in the number of theory training hours for tattooists from 110 to 130 hours generated much critical comment. However, the board and most of the licensed professionals commenting on the proposed regulations generally thought it was important to increase the required hours. This was to make sure that licensed tattooists have sufficient training related to sanitation, safety, anatomy, and the use of tattooing equipment. Additionally, the board limited, to two, the number of apprentices that a licensed tattooist could supervise at one time. By taking such action, the board believed that the quality of training would be improved.

The efficiency with which public inquiries or complaints regarding the activities of the board, commission, or agency filed with it, with the department to which a board or commission is administratively assigned, or with the office of victim's rights or the office of the ombudsman have been processed and resolved.

In the period between July 1, 2001 and May 2004, OccLic opened 67 investigations of complaints involving professionals regulated by BBH. More than half of these investigations were generated by OccLic, either through review of licensing applications or shop visits by investigators.

As of late May 2004, there were 30 open and pending cases at OccLic. Of those 30, we reviewed 11 more in-depth, primarily based on two criteria – seven of the cases had been opened longer than 120 days and four other cases stemmed from OccLic shop visits.

Nine of the 11 cases reviewed were handled in an untimely manner. Three of the cases could have been completed several weeks earlier, had the investigator been more experienced in writing up a civil fine document. One of the cases was awaiting completion of a memorandum of agreement (MOA) between the licensee and OccLic – although the decision to close the case by MOA had been made a year earlier. Work on another case was suspended, awaiting a draft of an accusation by OccLic. Two cases should have been closed earlier because, according to case files, there was a lack of evidence. Two other cases were completed more than 500 days earlier and were just awaiting final closure of the case files.

Efficiency issues related to investigations are being evaluated in another audit report. That report addresses the history, and evaluates the effectiveness, of the State's overall sunset process.

No complaints or investigations specifically involving the actions and activities of the Board of Barbers and Hairdressers were received, or undertaken by, either the Office of the Ombudsman or the Office of Victim's Rights within the past three fiscal years.

The extent to which the board or commission regulates entry into an occupation or profession has presented qualified applicants to serve the public.

The board is adequately regulating entry into the professions of barbers, hairdressers, estheticians, manicurists, and tattooists. Controls are in place and consistently performed to ensure it has presented only qualified applicants to serve the public. The applications are subjected to a checklist when received to verify that all required documentation, such as test scores and proof of education or experience, are present, ensuring that the applicant meets all statutory and regulatory requirements.

Listed below is a summary of new licenses and permits issued by the board for the period under review. This information was compiled from annual reports issued by the board.

New Permits Issued (Exclusive of Renewals)	FY 01	FY 02	FY 03	FY 04	Total Licenses (as of June 30, 2004)
Barbers	13	9	13	13	213
Hairdressers	138	150	119	170	2,030
Estheticians	30	33	45	42	354
Instructors	6	10	6	8	166
Manicurists	64	269	131	116	447
Body Piercers	0	6	9	3	15
Tattooists	0	15	18	6	30
Shop Owners	55	83	108	93	597
Schools	0	1	0	2	11

Applicants can apply for licensure by examination or by waiver (credentials). Barber, hairdresser, and esthetician applicants, by examination, are required to take both a written and practical examination administration. Three people, with at least one being a board member, score the practical examination. For the recently-added body piercers and tattooists/permanent cosmetic coloring, only a written test is administered.

The extent to which state personnel practices, including affirmative action requirements, have been complied with by the board, commission, or agency to its own activities and the area of activity or interest.

We did not find any evidence that the board was not complying with the state personnel practices, including affirmative action in qualifying applicants. In no instances has the board denied an applicant a license based on personal attributes.

The extent to which statutory, regulatory, budgeting or other changes are necessary to enable the board, commission, or agency to better serve the interest of the public and to comply with the factors enumerated in AS 44.66.050.

While we made no recommendations for statutory, regulatory, or budgetary changes, the board in its recent annual reports, has made several recommendations for proposed statutory changes. The FY 04 report listed the following recommendations:

1. Change the name of the board. BBH suggests that the name of the board be changed to reflect the broader scope of its licensing authority. As reflected in the board's statutes, in

addition to barbers and hairdressers, BBH licenses manicurists, estheticians, tattooists, and body piercers.

2. Increase the size of the board. In the FY 04 report, BBH advocates increasing the size of the board from six to nine. Such an expansion would allow all licensed groups to have at least one designated seat on the board. Currently, manicurists, estheticians,⁴ and body piercers⁵ do not have specifically designated seats on the licensing board.

⁴ Current statute requires that one seat on BBH be designated for a hairdresser who is also a licensed esthetician – but practitioners who are solely licensed as estheticians are not represented.

⁵Current statute designates that one seat on BBH be filled by either a licensed tattooist or body piercer – the current incumbent is a tattooist – the board’s proposal would eliminate the necessity that the two professions share a seat.



OFFICE OF THE COMMISSIONER

Frank H. Murkowski, Governor

December 30, 2004

Pat Davidson
Legislative Auditor
Legislative Budget and Audit Committee
Division of Legislative Audit
P.O. Box 113300
Juneau, AK 99811

RE: Board of Barbers and Hairdressers

Dear Ms. Davidson:

Thank you for the opportunity to review the Board of Barbers and Hairdressers Preliminary Audit Report.

Our response to the Recommendation is noted below:

Recommendation No. 1:

The legislature should consider implementing legislation to allow the board to delegate administration of the State's practical examination to training schools or apprentice supervisors.

We concur with this recommendation and look forward to working with the legislature to effect this change.

Sincerely,

Edgar Blatchford
Commissioner

cc: Rick Urion, Director
Division of Occupational Licensing