



OFFICE OF PROFESSIONAL REGULATION

Policy on Lash, Brow, and Manual/Mechanical Hair Removal Vermont-Licensed Cosmetologists & Estheticians

Purpose

Beautifying lashes and brows, and removing unwanted hair by manual and mechanical means, were added to the esthetics scope of practice in 2024. The intention was to clarify that estheticians and cosmetologists may engage in those activities. The intention was not to forbid unlicensed people from doing so or to require those activities to occur in licensed shops.

The purpose of this policy is to clarify that **no licensure is needed to beautify lashes or brows or to remove unwanted hair using manual or mechanical means.**

Relevant Law

Vermont law defines “esthetics” as:

- (i) cleansing, toning, stimulating, manipulating, beautifying, exfoliating, or performing any similar procedure on the human body using only cosmetic preparations, hands, mechanical or electrical apparatus or appliances, tonics, lotions, creams, or makeup;
- (ii) beautifying lashes and brows; and
- (iii) removing unwanted hair using manual and mechanical means.¹

“Manual and mechanical means” does not include laser hair removal,² which is outside the esthetics scope of practice.

¹ 26 V.S.A. § 271(a)(4)(A).

² *Id.* § 271(a)(4)(ii).

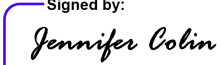
Under Vermont law, only licensed cosmetologists and estheticians may practice esthetics.³ It is unlawful to practice esthetics outside of a licensed cosmetology or esthetics shop.⁴ There are exceptions to both of these requirements.⁵

Policy

Anyone, including estheticians and cosmetologists, may beautify lashes or brows or remove unwanted hair using manual or mechanical means. No individual or shop license is required. A licensed esthetician or cosmetologist who engages in these activities must be properly trained.⁶

A cosmetology or esthetics license is required for “cleansing, toning, stimulating, manipulating, beautifying, exfoliating, or performing any similar procedure on the human body using only cosmetic preparations, hands, mechanical or electrical apparatus or appliances, tonics, lotions, creams, or makeup.”⁷ Unless an exception applies, these activities must occur only in esthetics or cosmetology shops.

The esthetics scope of practice never includes the practice of permanent cosmetics, even if applied to lashes or brows.⁸

Signed by:

 Signed: D190D9C5BA65468
 Jennifer B. Colin, Director

Date: 10/6/2025

³ *Id.* § 272(a).

⁴ *Id.* § 272(b).

⁵ *Id.* § 273.

⁶ Administrative Rules for Barbers, Cosmetologists, Estheticians, and Nail Technicians, Rule 13-8.

⁷ 26 V.S.A. § 272(a).

⁸ *Id.* § 4102(a).