

**Testimony of Scott Ward  
On behalf of  
Milan Laser Hair Removal**

**House Bill 377 - Proposed Amendments to R.C. 4731.33**

**House Health Committee**

**October 15, 2025**

Chair Schmidt and members of the House Health Committee, thank you for allowing me to provide testimony in support of HB 377, proposing needed amendments to Ohio's laser hair removal statute. My name is Scott Ward and I am a Partner in the Public Policy Group of Orrick, Herrington & Sutcliffe. I am proud to serve as National Policy Counsel to Milan Laser Hair Removal. Milan Laser was founded in 2012 by two Board Certified medical doctors and provides state of the art laser treatments in a safe, comfortable environment in every one of our 400+ locations in 38 states, including 20 locations in Ohio with 82 employees. Treatments are safe, and all procedures are performed by highly-trained medical professionals. All lasers are FDA cleared and are tailored to the patient's specific skin type and hair color.

Light-based medical devices for hair removal – laser hair removal – use a laser to remove unwanted hair in different areas of the body. Laser hair removal is commonly used as an alternative to shaving, tweezing, waxing or electrolysis for unwanted hair removal. With laser hair removal, the hair removal is accomplished by directing highly concentrated beams of light into hair follicles. The pigment (melanin) in the hair absorbs the light, which is converted to heat and in turn, damages the follicle. The damage inhibits or delays future hair growth.

R.C. 4731.33 governs the practice of laser hair removal – in its current form, it establishes who can provide laser hair removal and their training requirements, delegation allowances and the levels of supervision required, record keeping and provides penalties for failure to comply. This is a medical procedure, and the statute recognizes that the procedure should be appropriately regulated and performed by trained professionals.

Initially, I would like to thank Rep. Deeter for her leadership on this issue and for hosting interested party meetings, and working with her colleagues in both chambers in an effort to hear from everyone involved in this bill. The amendments in this bill have been discussed here at the capitol since late 2023, and we appreciate her efforts on HB 377 to bring clarity to the statute and to correct inconsistencies that linger in the statute following major revisions made in 2020 and 2021 by the General Assembly.

The proposed amendments in HB 377 accomplish the following:

- 1) Cleans up the outdated terms, like removing the stray references to cosmetic therapists, creates a new term, "laser hair removal professional" to refer to those individuals to aid in clarity and rearranges existing law provisions for ease of reading. These changes were suggested by the interested parties and LSC.

- 2) Maintains current law education and training requirements for laser hair removal professionals and physician assistants.
- 3) Creates new education and training requirements for RNs and LPNs to allow appropriately trained nurses to operate the hair removal lasers with off-site supervision – just like all other practitioners.
- 4) Creates a new section of the Code to authorize physician assistants and advanced practice nurses to supervise laser hair removal professionals, RNs, and LPNs.
- 5) More clearly outlines the authorizations to operate and supervise the operation of laser hair removal.

We believe the current law’s failure to provide for off-site supervision of RNs and LPNs, while allowing it for physician assistants and laser hair removal professionals, is an oversight. RNs and LPNs have years of medical training and with the additional appropriate training and education on the use of laser hair removal devices, our experience shows that these professionals provide excellent care to our patients. In fact, the majority of other states allow RNs or LPNs to conduct laser hair removal with off-site physician supervision.

#### Current Law

	Can the delegate operate the laser?	
Physician Assistant	Yes, with license + delegation under R.C. 4730.21 [subsection (C)]	
	With on-site supervision	With off-site supervision
LHRPs (grandfathered CTs or individuals with 750 hours of school)	Yes, if have subsection (D) training and education	Yes, if have subsection (D) + subsection (G) training and education
RN/LPN	Yes, with license	<b>NO</b>

#### Proposed Law

	Can the delegate operate the laser?	
Physician Assistant	Yes, with license + delegation under R.C. 4730.21 [subsection (C)]	
	With on-site supervision	With off-site supervision
LHRPs (grandfathered CTs or individuals with 750 hours of school)	Yes, if have subsection (D) training and education	Yes, if have subsection (D) + subsection (G) training and education
RN/LPN	Yes, with license	Yes, if have license + new subsection (H) training and education

HB 377 provides clarity and streamlines existing law regulating laser hair removal. Physicians maintain oversight of these practices, strong training requirements are maintained and expanded, and continuity is ensured for professionals who are engaged in the industry. I respectfully urge the committee to support HB 377, and I would be happy to take any questions.