



Town of Arlington
Department of Health and Human Services
Office of the Board of Health
27 Maple Street
Arlington, MA 02476

Tel: (781) 316-3170
Fax: (781) 316-3175

**Board of Health Meeting Agenda
Wednesday, January 31, 2018
Ground Floor Conference Room
Arlington Senior Center
5:30pm**

- I. Accept December 6, 2017 Meeting Minutes
 - II. Update: Plastic Bag Ban
 - III. Correspondence Received: Tattoo Apprentice
 - IV. Annual Report
 - V. Environmental Updates
 - Retail Food Standards
 - Housing
 - VI. Restaurant Updates
 - VII. Public Health Nurse Updates
 - VIII. Public Comment
- Adjourn



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D R A F T
Board of Health Meeting Minutes
Wednesday, December 6, 2017
BOH Conference Room
Arlington Senior Center
5:30pm

Board Members in Attendance: Dr. Marie Walsh Condon, Mr. Kenneth Kohlberg, Dr. Kevin Fallon

Staff in Attendance: Natasha Waden, Director of Public Health; Kylee Sullivan, Health Compliance Officer; Padraid Martin, Lead Health Compliance Officer; Jessica Kerr, Public Health Nurse

Others in Attendance: Singh Saab, Amahet Grigoryan, Maureen Lee (Food Services Solutions)

Recording Secretary: Laura Munsey, Health & Human Services Administrative Assistant

Meeting called to order by Dr. Marie Walsh Condon at 5:30 pm.

A motion was made by Mr. Kenneth Kohlberg, which was seconded by Dr. Kevin Fallon to accept the November 1, 2017 meeting minutes as submitted.

Vote: 3 – 0 (Unanimously) in favor of the motion

Hearing: Amendments to Regulations Restricting the Sale of Tobacco and Nicotine Delivery Products

Inspector Kylee Sullivan reported the Health Department, with Guidance from the Massachusetts Municipal Association (MMA), makes the following recommendation not to reduce through attrition the number of Tobacco and Nicotine Delivery Products Sales Permits which is currently set at 19 permits. It was recommended to close off the wait list referenced in Section (E)13 of the Regulations effective January 1, 2018, and no longer maintain a wait list as of January 1, 2020.

Following are the recommended and amended changes to the Regulations Restricting the Sale of Tobacco and Nicotine Delivery Products - Section (E) 13:

13. [add to end of last paragraph] New potential applicants for permits who are applying at a time when the total number of outstanding permits meets or exceeds the maximum number of permits allowed will be placed on a waiting list and will be eligible to apply for a permit on a “first-come, first-serve” basis as permits are either not renewed or are returned to the Arlington Board of Health.

[add]

14. Expiration of Waiting List: Any potential applicant that is currently on the waiting list as of January 1, 2018 may apply for a permit if and when an existing permit is returned to the Arlington Board of Health. However, this opportunity will expire on January 1, 2020, at which point the Arlington Board of Health will no longer maintain a waiting list. As of January 1, 2018, the Arlington Board of Health will no longer add potential applicants to the existing waiting list.

A **Motion** made by Dr. Kevin Fallon, which was seconded by Mr. Kenneth Kohlberg, to accept the recommendations as amended.

Vote: Motion Approved 3-0 in favor of the motion(Unanimously)

Hearing: Adoption of 2013 Food and Drug Administration (FDA) Food Code

Inspector Pat Martin informed the Board that two (2) informational meetings regarding the adoption of the 2013 FDA Food Code were held by the Health Department. Inspector Martin reported that representatives from a total of 37 permitted food establishments attended the meetings. Maureen Lee, of Food Service Solutions, presented a Power Point Presentation at these informational meetings and was available to answer questions regarding the 2013 Food Code. A few permitted food establishments have contacted the Health Department looking for additional information regarding the changes.

Inspector Martin invited Ms. Maureen Lee up to address the Board. Ms. Lee informed the Board that changes have gone very well. The concerns being expressed by the food establishments are “what do I need to know and when will this begin?”

Ms. Lee reported that there are some fairly significant changes in the 2013 Food Code that will require more active managerial control in establishments in order to achieve compliance with the 2013 Food Code. Director Waden stated the Health Department will roll out a one (1) year educational program to ensure establishments are prepared for the active managerial control emphasized in the 2013 Food Code. Tools will be put in place and all relevant information will be provided to the establishments.

Mr. Kohlberg’s inquired as to whether it would be better to adopt the 2017 Food Code instead of the 2013 Food Code. Ms. Lee responded that the recommendation to adopt the 2013 Food Code was reinforced at the Mass Health Officers Association Conference in November, where Michael Moore, from the Mass Department of Public Health’s Food Protection Program, reported the State is leaning towards adopting the 2013 Food Code. The State’s adoption of the 2017 Food Code is currently going through the legislative processes. It is believed

the 2017 Food Code may present challenges for smaller establishments, such as having a full time equivalent ServSafe manager on site at all times. Ms. Lee stated Arlington and most communities are currently using the 1999 Food Code. Newton, Melrose, Wakefield and Boston have adopted the 2013 Food Code. Ms. Lee stated if during the legislative process it is decided that the State goes back out for public comment, they will look at the 2017 Code. Director Waden also added that minor changes to the 2017 Food Code could later be adopted if desired.

A Motion was made by Mr. Kenneth Kohlberg, which was seconded by Dr. Kevin Fallon, to adopt the 2013 Food Code by Reference in January 2019.

Vote: Motion Approved 3 - 0 in favor of the motion (Unanimously)

Update: Not Your Average Joe's – Exhaust Hood

Inspector Kylee Sullivan updated the Board regarding the exhaust hood at Not Your Average Joe's. Inspector Sullivan provided pictures to the Board and stated that the exterior exhaust has been completely replaced by the requested deadline. Periodic checks will continue.

Correspondence Received: Compost Pilot Program (Town of Arlington Department of Public Works)

The Board was provided with copies of a correspondence received from Charlotte Milan, Recycling Coordinator, Department of Public Works dated November 2, 2017 regarding a Food Scrap Drop Off Pilot Program. Director Waden informed the Board that Inspector Sullivan has met with Charlotte Milan of the Arlington Recycling Program, regarding the proposed program. Three locations throughout town have been discussed. Ms. Waden reported the containers are animal proof and the lids close automatically. She further reported a large locked door swings open only for collection. The interior bin is completely encased and may be power washed during each collection. Charlotte Milan anticipates this to be a 2- year pilot program. Other communities participating in a food scrap drop off program include: Cambridge, Natick, Newburyport, and Boston. Inspector Martin is reaching out to these communities to see how the program is working, and if any concerns have been identified. Food scrap containers will be picked up by Garbage to Garden or Black Earth Compost.

Some concerns raised by the Health Department include:

- Reliance on residents to shovel out containers
- One location recommended has had rodent problems in the past, and may need to be reconsidered
- Insect, flies, and odor

Director Waden and Inspector Sullivan stated that DPW has been accepting and adaptable to concerns raised by the Health Department.

Environmental Updates:

Inspector Pat Martin informed the Board the the Environmental Protection Agency (EPA) has approved dry ice for a method of rat control. The Health Department has also been working with Boston University School of Public Health with rolling out a Master Plan regarding rodent activity in town.

A smoking complaint has been received regarding a newly designated smoking area at Millbrook Square Apartments, which is now a smoke-free facility. A designated smoking area has been established on Bacon Street, and a complaint was received from a resident of the new brownstone apartments, near Millbrooks designated smoking area.

Restaurant Updates

Inspector Kylee Sullivan provided the following updates:

Two new establishments have opened:

- The Green Light of Arlington
- Mamadou's Artisan Bakery

A Conditional Approval Letter has been sent to: 478 Mass Ave which will be opening soon.

Public Health Nurse Updates

Jessica Kerr, reported the Health Department is wrapping up the flu clinics, and two additional clinics were added at Menotomy Manor and the Arlington Senior Center. She further stated that flu season is gearing up and she will hold walk-in hours as necessary. An analysis of the season will be conducted and recommendations will be made for next year. Some suggestions include adding clinics at the Arlington Boy's and Girls Club, Fidelity House, St. Agnes Elementary School, and Arlington Catholic High School.

Public Comment

None

Meeting was adjourned at 6:25 pm



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Department of Health and Human Services
Office of the Board of Health

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MEMO

To: Board of Health Members
From: Kylee Sullivan, Health Compliance Officer
Date: January 23, 2018
RE: Correspondence Received: Request for Body Art Apprentice Permit

During the 2018 permit renewal process Ms. Ismini Vocas requested a Body Art Practitioner Permit to practice body art at Ink Jam Tattoo Studio in the Town of Arlington. After reviewing the Town's Rules and Regulations for Body Art Establishments and Practitioners and Ms. Vocas' application, I determined that Ms. Vocas does not have the two years of experience as a body artist required to obtain a Body Art Practitioner Permit in Arlington. Currently, the Town does not issue other body artist permits such as a Body Art Apprentice Permit. James Quinn, owner of Ink Jam, and Ms. Vocas were notified of this determination and both subsequently submitted formal requests to this Office for a change in the current Regulations to include the issuance of a Body Art Apprentice Permit.

In 2006, James Quinn made a similar request for a Body Art Apprentice Permit. At this time, the Board did not grant a variance to issue a Body Art Apprentice Permit.

The Massachusetts Department of Public Health, Community Sanitation Program provides Model Regulations for Body Art Establishments which do not mention Body Art Apprentice Permits. The Model Regulations do not quantify the experience that an applicant should have to become a body art practitioner, but they state that Boards may consider experience when reviewing applications.

Local communities such as Boston, Cambridge, Medford, and Lowell issue Body Art Apprentice Permits. The following are consistent training and experience requirements among said communities:

1. Applicants must meet all minimum training requirements of the Body Art Practitioner Permit, excluding the years of experience requirement.
2. A minimum of 3 years of body art experience for the practitioner under whom the apprentice will work.
3. Limits to the number of apprentices per body art establishment.

This matter is being brought in front of the Board to discuss whether or not changes should be made to the Town's Rules and Regulations for Body Art Establishments and Practitioners.

Please find the following documents attached:

1. Correspondence from Ismini Vocas and James Quinn.
2. Email sent to Ink Jam Tattoo Parlor explaining why Ms. Vocas cannot be issued a Body Art Practitioner Permit.
3. The Town of Arlington's Rules and Regulations for Body Art Establishments and Practitioners, Section 12. Application for Body Art Practitioner Permit.

From: "Kylee Sullivan" <KSullivan@town.arlington.ma.us>
To: inkjam12@gmail.com
Date: 12/12/2017 12:41 PM
Subject: Ismini Vocas

Dear Mr. Quinn,

I have reviewed the information regarding the possibility of allowing Ms. Ismini Vocas to practice in your establishment. At this time, Ms. Vocas lacks in one main area of the requirements, and that is that she does not have the 2 years of experience as a body artist. The Town of Arlington Rules and Regulations for Body Art Establishments and Practitioners does not allow for the issuance of apprentice permits.

Below are the requirements for a practitioner:

Practitioner Training and Experience

In reviewing an application for a practitioner permit, the Board may consider experience, training and/or certification acquired in other states that regulate body art.

Training for all practitioners shall be approved by the Board and, at a minimum, shall include the following:

***Bloodborne pathogen training program (or equivalent) which includes infectious disease control; waste disposal; handwashing techniques; sterilization equipment operation and methods; and sanitization, disinfection and sterilization methods and techniques; and
Current certification in First Aid and cardiopulmonary resuscitation (CPR).***

Examples of courses approved by the Board include "Preventing Disease Transmission" (American Red Cross) and "Bloodborne Pathogen Training" (U.S. OSHA). Training/courses provided by professional body art organizations or associations or by equipment manufacturers may also be submitted to the Board for approval.

The applicant for a body piercing practitioner permit shall provide documentation, acceptable to the Board, that s/he completed a course on anatomy and physiology with a grade of C or better at a college accredited by the New England Association of Schools and Colleges, or comparable accrediting entity. This course must include instruction on the system of the integumentary system (skin).

The applicant for a tattoo practitioner permit shall provide documentation, acceptable to the Board, that s/he completed a course on anatomy and physiology with a grade of C or better at a college accredited by the New England Association of Schools and Colleges, or comparable accrediting entity. This course must include instruction on the integumentary system (skin).

The applicant for all practitioners shall submit evidence satisfactory to the Board of at least two years actual experience in the practice of performing body art activities of the kind for which the applicant seeks a body art practitioner permit to perform, whether such experience was obtained within or outside of the Commonwealth.

A practitioner's permit shall be conditioned upon continued compliance with all applicable provisions of these rules and regulations.

At this time, I would recommend that Ms. Vocas work in a community that allows apprenticeships and reapply for a permit once the apprenticeship has been completed.

Thank you.
Sincerely,
Kylee

.....
Kylee Sullivan, MPH
Health Compliance Officer
Town of Arlington

December 13, 2017

Town of Arlington
Department of Health and Human Services
Office of the Board of Health
27 Maple Street
Arlington, Ma 02476

DEC 21 2017

To: Town of Arlington, Office of the Board of Health
Kylee Sullivan, MHP Health Compliance Officer
Michael Fitzpatrick DMD, Chair
Marie Walsh, M.D.
Kenneth Kohlberg, J.D., MPH

RE: Tattoo Artist Apprenticeship license/Permit **Second Request**

First, I would like to say how welcoming everyone was in your office. Every single person that walked by me asked me if I have been helped in a welcoming way. When I told them yes I was and that I was just waiting to speak to Kylee Sullivan they all made sure Kylee Sullivan knew I was waiting. That was so nice and amazing! I did not even wait long to speak to her and when I did speak to her she was very nice. Thank you.

I am writing in regards to obtaining a Tattoo Artist Apprentice Permit/License from the Town of Arlington for the Tattoo Artist Apprentice position at Ink Jam Tattoo, 12 Park Avenue Arlington, MA 02474. I am being trained and observing James Quinn, the owner of Ink Jam Tattoo, over forty hours a week for a few months now. I have been studying the laws, rules, regulations, and requirements of becoming a Tattoo Apprentice and future Tattoo Licensing Artist for the Town of Arlington and the State of Massachusetts.

After speaking with Kylee Sullivan, MPH Health Compliance Officer for the town of Arlington on the morning of December 13, 2017-12-13, Ms Sullivan stated I do not have 2 years experience as a body artist but I do have all other requirements to obtain a Tattoo Artist License. I am not requesting a Tattoo Artist License at this time. I am requesting an Apprentice Permit/license to complete my hours or 2 year required in the Town of Arlington to obtain a Tattoo Artist License in the future.

Ms. Sullivan did mention that the Town of Arlington Rules and Regulations for Body Art Establishments and Practitioners does not allow for the issuance of Apprentice Permit. I requested to see this statement in the Town of Arlington Rules and Regulations for Body Art Establishments and Practitioners Policy when I spoke to Ms. Sullivan, this statement was not shown to me. It also does not state this rule on the Town of Arlington Rules and Regulations for Body Art Establishments and Practitioners Website.

In regards to the Town of Arlington's concern for the public's safety for an apprentice tattoo artist to practice in this town, the Town of Arlington Rules and Regulations for Body Art Establishments and licensed Tattoo Artist Practitioners policy, safety concerns

applied are the same. Just as a licensed tattoo artist must have a client sign a "Consent to Tattoo Form", an apprentice artist also must clearly explain to the client the risks and have the client sign a "Consent To Tattoo by an Apprentice Form", that I have provided to you in my first request.

Overall, I understand the importance of maintaining a clean and sterile work environment and I always put the safety of the clients first. I know and adhere to all the rules and regulations associated with tattooing and the importance of checking ID and making sure the client meets the legal requirements. I can explain the tattooing process beforehand to make sure the clients understand it is permanent and I can explain the aftercare to prevent infection from occurring. By using pumpkins, I have learned how to use the tattooing equipment and the overall tools related to this field correctly and I have the skills to put together disposable ink containers to use for individual clients (pumpkins) in order to keep the sink sterile.

Feel free to contact me at (339)223-3602 if you need any additional information.
Enclosed: Consent To Tattoo by an Apprentice Form

Sincerely,



Ismini Vocas
149 Madison Avenue
Arlington, MA 02474
(339)223-3602
vocas.mina@gmail.com

CONSENT TO TATTOO by an APPRENTICE

NAME _____ DATE _____ DOB _____

ADDRESS _____ CITY _____ STATE _____ ZIP _____

HOME PH. _____ WORK PH. _____ DRIVERS LICENSE: _____

I acknowledge by signing this agreement that I have been given the full opportunity to ask any and all questions which I might have about the obtaining of a tattoo and that all of my questions have been answered to my full satisfaction. I specifically acknowledge I have been advised of the facts and matters set forth below and I agree as follows:

- If I have I have any condition that might affect the healing of this tattoo, I will inform my tattooer. I am not pregnant or nursing. I am not under the influence of alcohol or drugs.
- I do not have medical or skin conditions such as but not limited to: acne, scarring (Keloid) eczema, psoriasis, freckles, moles or sunburn in the area to be tattooed that may interfere with said tattoo. I have any infection or visible rash anywhere on my body, I have advised my tattooer.
- I acknowledge it is not reasonably possible for the representatives and employees of this tattoo shop to determine whether I might have an allergic reaction to the pigments or processes used in my tattoo, and I agree to accept the risk that such a reaction is possible.
- I acknowledge that infection is always possible as a result of the obtaining of a tattoo, particularly in the event that I do not take proper care of my tattoo. I have received aftercare instructions and I agree to follow them while my tattoo is healing. I agree that any touch-up work needed, due to my own negligence, will be done at my own expense.
- I realize that variations in color and design may exist between any tattoo as selected by me and as ultimately applied to my body. I understand that if my skin color is dark, the colors will not appear as bright as they do on light skin.
- I understand that if I have any skin treatments, laser hair removal, plastic surgery or other skin altering procedures, it may result in adverse changes to my tattoo.
- I acknowledge that a tattoo is a permanent change to my appearance and that no representations have been made to me as to the ability to later change or remove my tattoo. To my knowledge, I do not have any physical, mental or medical impairment or disability which might affect my well being as a direct or indirect result of my decision to have a tattoo.
- I acknowledge I am over the age of eighteen and I have truthfully represented that the obtaining of a tattoo is my choice alone. I consent to the application of the tattoo and to any actions or conduct of the representatives and employees of the tattoo shop necessary to perform the tattoo procedure.
- I understand I am being tattooed by an apprentice.

CLIENT: _____ DATE _____

APPRENTICE: _____ DATE _____

January 4, 2018

JAN 23 2018

Town of Arlington
Department of Health and Human Services
Office of the Board of Health
27 Maple Street
Arlington, Ma 02476

To: Town of Arlington, Office of the Board of Health, Office of the Public Health
Kylee Sullivan, MHP Health Compliance Officer
Michael Fitzpatrick DMD, Chair
Marie Walsh, M.D.
Kenneth Kohlberg, J.D., MPH
Natasha Waden, Director of Public Health

RE: Tattoo Artist Apprenticeship Permit Program

I, James Quinn, the owner Ink Jam Tattoo Studio, am writing in request for the Town of Arlington Office of the Board of Health and Office of the Public Health to create a Tattoo Artist Apprentice Permit Program in the Town of Arlington Rules and Regulations for Body Art Establishments and Practitioners.

About the end of November or early December, I have personally delivered to the Office of the Board of Health a request to obtain an apprentice permit letter and portfolio from Ismini Vocas. On December 12, 2017 Kylee Sullivan, MPH Health Compliance Officer for the town of Arlington sent me an email stating that the Town of Arlington Rules and Regulations for Body Art Establishments and Practitioners does not allow for the issuance of Apprentice Permit.

After going over the Town of Arlington Rules and Regulations for Body Art Establishments and Practitioners Policy and the Website it does not state that, the Town of Arlington does not allow the issuance of an Apprentice Permit.

I have been looking for a Tattoo Artist, or an Artist that wants to become a Tattoo Artist for quite some time now. My Tattoo Artist, Lauren Sleeper, after ten years of working in my shop as a Tattoo Artist has moved about ninety miles away. It is just too many miles away for her to keep coming back and forth therefore, I have been working and running my shop alone. Lauren did request a Tattoo Apprentice Permit ten years ago and the Town of Arlington Office of the Board of Health did say they did not have this program but they will look into it.

I have been interviewing many Tattoo Artists for months now and no one artist fits the description until I interviewed Ismini Vocas. Ink Jam Tattoo Studio is a Five-Star tattoo studio and it is very important for me to find the right artist. Ismini not a tattoo artists but she is unique, very passionate in the world of art, an amazing artist, business and management oriented, strong customer relations and more. She is highly qualified and fits

the description for my shop. I plan to have Ismini my business partner in the future that is how confident I am in her. It would be a great privilege for me to train Ismini to tattoo.

Overall, I have been loyal to the Town of Arlington for over ten years. I met wonderful residents and most of them I have become close friends. In addition, Ink Jam Tattoo Studio has raised thousands of dollars for Veterans and their families. All I ask is for the Town of Arlington, Office of the Board of Health and Office of Public Health to create a Tattoo Apprentice Permit Program so I can train Ismini Vocas.

Could we schedule a meeting to discuss my request? Feel free to contact me at (781)316-2393 if you need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'James Quinn', with a long, sweeping horizontal stroke extending to the right.

James Quinn
InkJam Tattoo Studio
12 Park Ave
Arlington, MA 02474
Inkjam12@gmail.com

- (A) No person may operate a body art establishment except with a valid permit from the Board.
- (B) Applications for a permit shall be made on forms prescribed by and available from the Board. An applicant shall submit all information required by the form and accompanying instructions. The term "application" as used herein shall include the original and renewal applications.
- (C) Each applicant for a permit to operate a body art establishment shall appear at a regularly scheduled Board of Health meeting to present application materials.
- (D) An establishment permit shall be valid from the date of issuance and for no longer than one year unless revoked sooner by the Board.
- (E) The Board shall require that the applicant provide, at a minimum, the following information in order to be issued an establishment permit:
 - (1) Name, address, and telephone number of:
 - (a) the body art establishment;
 - (b) the operator of the establishment; and
 - (c) the body art practitioner(s) working at the establishment;
 - (2) The manufacturer, model number, model year, and serial number, where applicable, of the autoclave used in the establishment;
 - (3) A signed and dated acknowledgement that the applicant has received, read and understood the requirements of the Board's body art regulations;
 - (3) A drawing of the floor plan of the proposed establishment to scale for a plan review by the Board, as part of the permit application process; and,
 - (4) Exposure Report Plan
 - (5) Such additional information as the Board may reasonably require.
- (F) The annual fee for the Body Art Establishment Permit shall be \$1,000.
- (G) A permit for a body art establishment shall not be transferable from one place or person to another.

12. Application for Body Art Practitioner Permit

- (A) No person shall practice body art or perform any body art procedure without first obtaining a practitioner permit from the Board. The Board shall set a reasonable fee for such permits.
- (B) The annual fee for a body art practitioner permit shall be \$200.
- (C) A practitioner shall be a minimum of 18 years of age.
- (D) A practitioner permit shall be valid from the date of issuance and shall expire no later than one year from the date of issuance unless revoked sooner by the Board.
- (E) Application for a practitioner permit shall include:
 - (1) name;
 - (2) date of birth;
 - (3) residence address;
 - (4) mailing address;
 - (5) phone number;
 - (6) place(s) of employment as a practitioner; and
 - (7) training and/or experience as set out in (G) below.
- (F) Each applicant for a body art practitioner permit shall appear at a regularly scheduled Board of Health meeting to present application.
- (G) Practitioner Training and Experience
 - (1) In reviewing an application for a practitioner permit, the Board may consider experience, training and/or certification acquired in other states that regulate body art.
 - (2) Training for all practitioners shall be approved by the Board and, at a minimum, shall include the following:
 - (a) bloodborne pathogen training program (or equivalent) which includes infectious disease control; waste disposal; handwashing techniques; sterilization equipment operation and methods; and sanitization, disinfection and sterilization methods and techniques; and
 - (b) Current certification in First Aid and cardiopulmonary resuscitation (CPR).

Examples of courses approved by the Board include "Preventing Disease Transmission" (American Red Cross) and "Bloodborne Pathogen Training" (U.S. OSHA). Training/courses provided by professional body

art organizations or associations or by equipment manufacturers may also be submitted to the Board for approval.

- (3) The applicant for a body piercing practitioner permit shall provide documentation, acceptable to the Board, that s/he completed a course on anatomy and physiology with a grade of C or better at a college accredited by the New England Association of Schools and Colleges, or comparable accrediting entity. This course must include instruction on the system of the integumentary system (skin).
 - (4) The applicant for a tattoo practitioner permit shall provide documentation, acceptable to the Board, that s/he completed a course on anatomy and physiology with a grade of C or better at a college accredited by the New England Association of Schools and Colleges, or comparable accrediting entity. This course must include instruction on the integumentary system (skin).
 - (5) The applicant for all practitioners shall submit evidence satisfactory to the Board of at least two years actual experience in the practice of performing body art activities of the kind for which the applicant seeks a body art practitioner permit to perform, whether such experience was obtained within or outside of the Commonwealth.
- (H) A practitioner's permit shall be conditioned upon continued compliance with all applicable provisions of these rules and regulations.

13. Grounds for Suspension, Denial, Revocation, or Refusal to Renew Permit

- (A) The Board may suspend a permit, deny a permit, revoke a permit or refuse to renew a permit on the following grounds, each of which, in and of itself, shall constitute full and adequate grounds for suspension, denial, revocation or refusal to renew:
- (1) any actions which would indicate that the health or safety of the public would be at risk;
 - (2) fraud, deceit or misrepresentation in obtaining a permit, or its renewal;
 - (3) criminal conduct which the Board determines to be of such a nature as to render the establishment, practitioner or applicant unfit to practice body art as evidenced by criminal proceedings resulting in a conviction, guilty plea, or plea of nolo contendere or an admission of sufficient facts;