

From: [Elizabeth Jones](#)
To: [Trisha Linebarger](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, October 5, 2020 4:02:32 PM

From: sunset@sunset.texas.gov On Behalf Of Texas Sunset Commission
Sent: Monday, October 5, 2020 3:50:23 PM (UTC-06:00) Central Time (US & Canada)
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS DEPARTMENT LICENSING AND REGULATION

First Name: Joe

Last Name: Arrington

Title: Division Chair

Organization you are affiliated with:

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City: Waco

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

Comments re: Sunset recommendation about licensing of Barbering and Cosmetology professionals.

Comments on Recommendations by the Sunset Commission regarding Licensing of Cosmetologists This is an updated comment focused specifically on the issue of licensing of instructors in Barbering and Cosmetology

I Agree that the current rules governing Barbering and Cosmetology be replaced with a single common standard. I concur with the statement "...This distinction and the contrasting cultural perceptions of each profession are rooted in the outdated tradition of barbers focusing on men's hair and shaving, while cosmetologists focus on women's hair and other services. Today, men and women work in both occupations, serve diverse clientele, and sometimes offer services side-by-side." (pg. 41)

I Disagree with the following:

1. That the requirement for an instructor's license for Barbering & Cosmetology be discontinued. The teaching of a subject is very different from the practice of the subject. The report makes an assumption that in the doing of the job, people would naturally develop the skills needed be able to instruct other. This is a false assumption.

Here are these clear problems with the proposal:

--the teaching of others requires a very specific skill set. Included are the ability to conceptualize a complex set of skills and information into a progressively building learning flow.

--the ability to communicate information effectively using techniques of verbal, written, and now technological skills.
--the knowledge of how to design, implement and assess whether learning is happening is not a skills set taught in gaining the basic cosmetology license nor is it a naturally developed skill that would evolve with the provision of services to clients.

--the ability to see beyond what you already know, to expand your own repertoire and integrate those new skills and knowledge into a curriculum.

--it leaves the judging of instructor quality purely to the schools that hire them. While some instructional entities (such as college and public schools) have their own oversight entities that speak to instructor qualifications, no such

oversight exists for the private instructional salons.

--without such oversight on the quality of who provides instruction, we create a system where the education quality of the next generation of

provides cannot be assured That decline in quality of instruction lets that

stage for a decline in the quality of service provided, undermining the overarching mandate to protect the health and safety of the public.

--the only requirement listed in the Sunset recommendation is that criminal background check be passed, a mandate that has nothing to do with the quality of instruction.

--assuming the merging of Cosmetology and Barbering occurs, this means instructors will be faced with very different groups of students in terms of educational preparation, gender, and back grounds. This would mean that the preparation of the instructor becomes even more mission-critical to the success of the educational process and ultimately to the student.

In summary, the teacher of any knowledge or skill is the most important tool in the learning of the student. A poorly prepared teacher sets the stage for poorly prepared students. Therefore the first point of control in the development of a quality professional is to address the quality of instruction they receive and the quality of the person providing that instruction.

I Suggest that is part of the recommendation be set aside. The merger of the practice of barber and cosmetology would set the stage for a re-evaluation of the preparation of those who teach others this new and blended practice. Rather than being abolished, the preparation of those teaching should be examined and enhanced to include all facets of the new combined skills and knowledge.

In Conclusion, the State of Texas created the process of licensing to assure the safety of the population by requiring those who perform a task to demonstrate they are truly skilled in that task. That should include those who train novices in how to do the task. We now have an opportunity to make that function better—not to step away from our obligation. Increased respectful use of Advisory Groups, better focus on the part of those functioning State agencies, and better skill building on the part of those who train practitioners are actions that could make for better services provided in professional and safe methods to the people of Texas.

I grant permission for this comments to be posted

Any Alternative or New Recommendations on This Agency: included in the above dialog box

My Comment Will Be Made Public: I agree