



August 13, 2020

To: Sunset Advisory Commission  
P.O. Box 13066  
Austin, Texas 78711

Greetings Sunset Advisory Commission,

Please allow me to introduce myself. I am Lilly Benitez, Director/Owner of Blade Craft Barber Academy since 2015. I am proud to hold TDLR Licenses in Massage Therapy, Massage Instructor, Class A Barber, and Barber Instructor with my career beginning in 2003.

The academy boasts of very close to 100% pass rates at State Boards. We also offer CE courses for Cosmetologists having an array of curricula approved through TDLR Education Department.

We have also been approved by the State Approving Agency, Texas Veterans Commission, and the VA to accept GI Bills to empower Veterans in a new career. We seek to engage them with their new civilian lifestyle.

We are committed to serving our communities, and the underserved populations of Minorities and Veterans.

It is for these and the reasons stated below that we adamantly oppose the Sunset Committees recommendations for TDLR of June 2020.

Specifically let's review Issue 3

Per Sunset Committee: **"Regulating Barbering and Cosmetology Separately Is Inefficient, Unfair, and Unnecessary to Protect the Public."**

**Licensing barbers and cosmetologists is necessary to protect Texans from unsanitary practices. However, while these professionals often provide identical services, the state divides them into siloed licensing programs, which wastes state resources, creates arbitrary disparities between licensees, and protects unknowing consumers inconsistently. Further, both programs include burdensome regulations that do not enhance public safety and should be removed. Combining and simplifying TDLR's licensing of barbers and cosmetologists would eliminate unfair treatment of licensees,**

**reduce burdens on licensees and staff, and improve communication across the industry without compromising consumer protection.**

**Key Recommendations**

**-Consolidate Texas regulation of barbers and cosmetologist, and administer the two programs as one.**

**-Eliminate instructor and wig-related licenses.”**

Let's look at the first recommendation:

a: Both The Barber and cosmetology programs were each reduced by 1/3 of the time required to obtain a license. The reduction just went into affect this spring. In light of the pandemic, sanitation, disinfection, and sterilization has proven to be even more imperative.

We should wait at least 48 months after these hourly reductions yield results to properly assess the data of that decision before we dive into an additional extreme situation like combining two licenses.

b: As a whole industry, we have not had major outbreaks thanks to our level of preparedness, safety guidelines, and protocols. Education is our primary ally in serving the public, and protecting ourselves. Less education is never the answer.

c: With human trafficking in the limelight, we are also now required to take education to further assist authorities in stopping the situation from happening. With each program having been reduced by a third, and more expectations being set on the shoulders of Barbers & Cosmos, the reduced time in education has yet to show its results.

The combination of both programs into one is inefficient, ignorant, and not in the benefit of public safety if not increasing the total program hours to a 2000 hour minimum.

We will now address the second recommendation:

a: It is obvious that the individuals assessing the different licenses did not take the time to assess what the instructor license entails. An instructor license prepares an industry licensed professional on the intricacies of pedagogy, laws, license requirements, examination understanding, and learning styles.

Most of the individuals that are attracted to a trade as a career choice, are not interested in college. The instructor program exposes them to very important techniques to manage, inspire, and effectively teach an array of learning styles that they would not access elsewhere in their trade careers.

b: Divers, paramedics, pilots, and CDL all require an Instructors license to effectively impart the skills needed to safely execute said jobs. Pre-K through college all require a unique instructor certification.

The revenue that TDLR accepts from Cosmetologists and Barber licenses each year prove that our Industry is an honorable and real profession akin to those mentioned above.

c: In the Barber and Cosmetology industry specifically this year, the practical exam to become licensed has undergone multiple changes. If you were to ask any random licensed professional what the requirements are in order to pass the exam, they would not be able to tell you.

They especially would not have had access to formal managerial, leadership, content creation, or lesson planning education.

d: Unfortunately, one of the issues in our Industry is school's selling the hours required to obtain the licensure without requiring students to attend. This behavior would be even more rampant if individual licensed educators were not present. A licensed Instructor takes both written and practical exams to understand the expectations of the school as well as the students.

Simply stated, the Instructor's license is imperative to ensuring the safety and quality of education. They are the filter for not the institution, but the public that what is being taught indeed aligns with TDLR expectations.

The last recommendation I will address is the deregulation of the Barber Pole. In light of the times we are living today, structures that symbolize a positive message needed. The barber pole is to Barber's what the American flag is to patriots. It's history to our craft is universal, and it is very important that we continue to protect it. We do not want the public to be misled by people utilizing the barber pole without a license.

I urge you to take these oppositions very seriously. My personal experiences, and listening to the community we serve are what have lead me to fight against the threats to our history, culture, and craft.

Feel free to call me at the number below, and I am happy to stop by in person if need be.

Warm regards,

Lilly Benitez  
Director

LMT  
Class A Barber  
Barber Instructor

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**From:** [Elizabeth Jones](#)  
**To:** [Trisha Linebarger](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Friday, June 19, 2020 6:35:26 AM

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From: sunset@sunset.texas.gov On Behalf Of Texas Sunset Commission  
Sent: Thursday, June 18, 2020 11:33:42 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: Lilly

Last Name: Benitez

Title: Director of Education

Organization you are affiliated with: Blade Craft Barber Academy

Email: lilly@bladecraftbarber.com

City: Dallas

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:  
Opposed to abolishing Instructors Licenses.

Opposed to combing barber and cosmo licenses.

Any Alternative or New Recommendations on This Agency: Print licenses that resemble a Texas Driver License format to reduce copying and forgery.

My Comment Will Be Made Public: I agree