

From: [Elizabeth Jones](#)
To: [Trisha Linebarger](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, June 25, 2020 11:28:09 AM

From: sunset@sunset.texas.gov On Behalf Of Texas Sunset Commission
Sent: Thursday, June 25, 2020 11:26:27 AM (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: Shawanda I

Last Name: Cox

Title:

Organization you are affiliated with:

Email:

City: Odessa

State: Texas

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

I want to take the time to thank all of you at the sunset review committee for your diligence in reviewing the operations of the Texas Dept. of Licensing and Regulation, and specifically the Barber and Cosmetology industries.

It is these recommendations listed in your staff report that I would like to address.

1. Consolidating the barber and cosmetology programs.

I completely support this consolidation - taking several things into consideration. Please see additional comments below.

2. Eliminate instructor and wig-related licenses.

First off, I believe these are 2 separate issues and should be addressed as such, so I will break them down into 2a. and 2b.

2a. Eliminate instructor licenses – I completely OPPOSE this action. Please see additional comments below.

2b. Eliminate wig related licenses – I am neither for, nor against this proposal. Please see additional comments below.

Any Alternative or New Recommendations on This Agency:

I want to take the time to thank all of you at the sunset review committee for your diligence in reviewing the operations of the Texas Dept. of Licensing and Regulation, and specifically the Barber and Cosmetology industries.

It is these recommendations listed in your staff report that I would like to address.

1. Consolidating the barber and cosmetology programs.

I completely support this consolidation - taking several things into consideration.

I personally am licensed in both industries. I hold both an Instructors in Cosmetology and an Instructors in Barbering licenses. In the current stance of these two industries, there are many differences that I would feel need to be addressed in consolidating them. I understand that the goal of consolidation is that they offer the same services and trying to create a pathway of least resistance for those trying to enter the industry. At current standards, barbers only require a 7th grade education and 15 years of age, whereas, cosmetology requires 17 years of age and a high

school diploma or GED. If the 2 industries are consolidated into one, I feel the requirements should be met in the middle, such as 16 years of age and must be enrolled in school (similar to the VOE (verification of enrollment) requirement for drivers education of Texas) or have a high school diploma or GED. To nullify this requirement, would in my opinion encourage students to drop out of high school, to pursue an industry that they think is all fun and games, not understanding the hard work and effort put behind every skill required of this license.

There is also the difference of cosmetology requiring 4 hours of continuing education, whereas currently, barbering, does not require any CE hours. I believe this should take on a similar form as to the requirements that cosmetology currently holds. A suggestion of requiring 4 hours of Continuing Education across the board. 2 hours in safety and sanitation and 1 hour in human trafficking and 1 hour in desired industry topic (cutting, coloring, etc.)

This also brings into consideration the Advisory Committee should the two industries be consolidated. I honestly feel that industry voices need to be able to be heard. I feel there should be a reasonable way to make all positions from both current committees combined without losing any respected voice of the industries. The recommendations I have heard at this point would lose one to 2 voices from the cosmetology industry that we deem very important in those committees.

One of the other differences I note in the consolidation of these 2 industries lies within the legislative law making and TDLR rule making abilities. Currently, the required number of instructional hour requirements for cosmetology lie with the legislative process, whereas the same requirements for barbering lie with TDLR. This will also need to be addressed prior to consolidating these professions. Personally, I think these requirements should lie with TDLR, so that any changes could be made by those most effected by said changes, and they will have the vote as to which changes to make. For example, this whole Covid 19 pandemic has caused a lot of confusion as to how the cosmetology schools can still effectively train our students within the guidelines of the law, as the law states that only 25% of cosmetology curriculum can be taught in an online setting. These types of laws create frustrating and confusing mandates in a time where normal is all but obsolete. These types of requirements should lie within the industry voting rights of the TDLR committees.

2. Eliminate instructor and wig-related licenses.

First off, I believe these are 2 separate issues and should be addressed as such, so I will break them down into 2a. and 2b.

2a. Eliminate instructor licenses – I completely OPPOSE this action. Again, I hold instructors' licenses in both industries. I took cosmetology in high school and became a licensed operator in 1994. I worked in the industry as a stylist until 2003 before considering becoming an instructor. As I entered the instructor program, I realized that instructors not only need to know their skills they are teaching the students, but there are a variety of additional things they are required to be knowledgeable in as well. Things like student diversity and how to connect with students, classroom management, learning styles, behavioral issues and how to address them, economic issues, and many other factors that affect a students' learning abilities. I feel that had I tried to come straight out of cosmetology and go straight into teaching, would have been disastrous for any students who may have entered any class led by myself at that time. Even after completing my instructors training, I feel that I needed to learn more. I have been a licensed instructor since 2004 and employed as a full-time instructor since 2006, and still find there is much I haven't learned when it comes to teaching. The cosmetology and barber technical skills I know, learning about the various types of students and their abilities, on the other hand are a different set skill that must be acquired before becoming an effective instructor!

2b. Eliminate wig related licenses – I am neither for, nor against this proposal. I do feel that there is an overabundance of cosmetology related licenses that could be eliminated or consolidated. However, at the same time, I understand that the powers that be are looking for ways to create the pathways into this workforce easier for those wanting to enter these professions, and by having separate specialized licenses provides those opportunities. I honestly know of many students who only want to do haircoloring and would like to see a specialized license for colorists. The same goes for some who only want to cut hair, and want to see a specialized license for that, or for styling only. So, in my opinion this could be a double-edged sword. The question is, what types of specialized licenses, if any, should we have? I do not see a need for a wig related license, but I do see a need for anyone who works within our industries in any form or fashion be well versed in any safety and sanitation requirements that affect the areas represented in their specialized field.

My Comment Will Be Made Public: I agree