

TEXAS INDUSTRIAL VOCATIONAL ASSOCIATION (TIVA)
 COSMETOLOGY INSTRUCTORS IN PUBLIC SCHOOLS (CIPS)
 Comments to Texas Sunset Advisory Commission
 December 3, 2020

1. Consolidate the Barber and Cosmetology License – Tentatively Support

CIPS supports the consolidation of the licenses in concept, but of course the devil is in the details of the consolidation. For example, note some of the differences in requirements between the two license types:

Barbers

7th grade education
 16 years of age
 No Continuing Education

Cosmetology

High school diploma or GED
 17 years of age
 Continuing Education

Which requirements will increase or decrease, or will they meet in the middle?

CIPS favors requiring a high school diploma or GED for the consolidated license. This will lend credibility to the profession and help keep students in school to complete their education. Completing the requirements for a high school diploma or equivalency certificate prepares students to further their education in a community college or university, which would allow them to expand their training to other avenues of the cosmetology industry such as business ownership, or explore other career paths.

Below are other examples of discrepancies between the two license types:

Barbering Requirements	Cosmetology Requirements
Individuals must sweep hair as soon as practicable (which, in practice, is as time allows).	Individuals must sweep hair after every client.
Individuals must dispose of hair in trashcans, which can be covered or uncovered.	Individuals must dispose of hair in covered trashcans.
Individuals can use certain alcohols as agency-approved disinfectants.	Individuals cannot use similar alcohols as agency-approved disinfectants.
Shops must post a copy of sanitation rules.	No equivalent requirement; however, each stylist is required to have a TDLR Rules and Regulation Rule book on hand.
No equivalent requirement	Salons and schools must post information about human trafficking.

2. Eliminate the Cosmetology Operator Instructor License - OPPOSED

CIPS urges members of the Sunset Advisory Commission to recommend retaining at least the Operator Instructor License. There are currently 5,686 Cosmetology Operator Instructors teaching in public schools, community colleges, and private cosmetology schools. Eliminate the other instructor licenses if you must, but consolidate the Barber Class A Instructor License (currently 596 licensees) with the Cosmetology Operator Instructor License so our teachers know how to teach.

Just because one can do the skill does not mean they can teach the skill. There is more to being an instructor than just demonstrating techniques. Classroom management, student learning styles, sanitation and disinfection requirements, and state testing are just a few of the issues that a licensed instructor faces every day in the classroom.

Being able to break down a skill or its theory in order to teach it can be a difficult task if the teacher does not understand the steps and the proper sequencing so that the student can understand and learn how to apply the skill or theory. Proper instructor training is the foundation to our industry. A teacher must learn how to teach before they have the knowledge of pedagogy and classroom management techniques necessary to train others.

Not every student learns in the same way. Licensed cosmetology instructors in a high school program complete many hours of professional development and continuing education in order to bring out the best in each of their students, so that upon high school graduation they also leave with their cosmetology license and entry into a career that will support them and their families. Not requiring specialist instructor licenses and ensuring the instructors know the fundamentals of teaching would be extremely detrimental to the future of the cosmetology industry.

In addition, PSI Corporation ("PSI"), which contracts with TDLR to administer the cosmetology license exams, require their test administrators to hold an Operator Instructor License and have subject matter teaching experience so that they can properly evaluate prospective licensees.

All academic teachers must hold a teaching certificate, whether they earn it as part of their college degree program or through alternative certification programs. Many other professions, such as massage therapy, require their instructors to hold a separate license. There is much more to teaching cosmetology than demonstrating hands-on hair or nail skills, such as instruction regarding potentially dangerous chemicals, and sanitation requirements and procedures. ***The Instructor License course provides cosmetology teachers advanced training in the pedagogy of teaching the cosmetology course work, similar to an alternative certification program. The Instructor License is crucial.***

Contact:

Shannon Noble
TIVA/CIPS Government Affairs Counsel
shannon@noble-government-solutions.com
512-422-4519