

**From:** [Elizabeth Jones](#)  
**To:** [Trisha Linebarger](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Wednesday, June 24, 2020 3:51:52 PM

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From: sunset@sunset.texas.gov On Behalf Of Texas Sunset Commission  
Sent: Wednesday, June 24, 2020 3:35:50 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: Bobbi

Last Name: Wagoner

Title: Owner/ Director

Organization you are affiliated with: The Strand Institute of Beauty & Esthetics

Email:

City: Portland

State: Texas

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

Issue 3

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 cosmetologists, and administer the two programs as one.
- Eliminate instructor and wig-related licenses.

I am responding with great concern with eliminating the instructor program.

As a Licensed Cosmetologist for 35 years, A salon owner for 25 yrs, Licensed Instructor for 8 years and a school owner for 6 years, I feel I have a good understanding of all aspects of our industry. There is a big difference in being able to perform a service on a client with training from the Cosmetology course and being able to teach to students. First let me say that TDLR already reduced the state requirements to 1000 making every hour crucial to be able to restructure the course in to only 2/3 of the program.

Students becoming licensee under the new requirements are mainly missing out in the mastering of there skills and building confidence with the remaining

1/3 that was removed from the hour requirements. When a licensed cosmetologist enrolls into the Instructor program they are not learning anything to do with hair, it is all on Teaching and Learning Environment, Teaching Study Skills, Learning Styles, Communicating, Presenting, Classroom management, Lesson Planning, Educational Aids, Advising and Assessing students and their progress, Retain Students, Team work and so much more. I can not express how challenging students with different learning abilities and personalities can be. There has to be proper guidance and classroom and clinic floor instruction. Our times are changing and we all are wanting instant gratification or easier, but a persons career having the best instruction is not where we need to think that removing

the Instructor license is the answer. TDLR offers a 750 and a 500 hour Instructor license.

The requirements of the 750 you do not have to have any prior experience after obtaining your Cosmetology License. The 500 you have to have 1 year experience using your Cosmetology License. Now I believe you should do away with the 750 so the Cosmetology student would have more respect if an educator had some experience in the salon industry. I do not even offer the

750 at my school for that reason.

Now barbering and cosmo are 2 different styles and the barbering has come a long way. Again I don't offer barbering at this time, because it is a different type of skill and student. I would say most barbers are male and end up working in a mostly male environment and Cosmo would be a more beauty driven environment. Now don't get me wrong, my salon we do men, but not the shaving that Cosmo are not licensed to do or the more intricate haircuts that barbers do. Cosmo are more into color, texturing, cutting, and styling of hair. Totally different styles and we are an artistic career choice and that is where the difference comes from in choosing your licensed type. As far as wigs, you did away with braiding already which can be very damaging to the scalp and hair, wigs is a waste of time. We teach that in Cosmo so I do not believe that is important and we could remove that.

Any Alternative or New Recommendations on This Agency: Please take the time to consider the future of our Industry and being able to keep our standards and profession at a respectful level. It is such a rewarding career, both financially and emotionally. We do not just cut hair!

My Comment Will Be Made Public: I agree