

From: [Elizabeth Jones](#)
To: [Trisha Linebarger](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, August 10, 2020 12:30:21 PM

From: sunset@sunset.texas.gov On Behalf Of Texas Sunset Commission
Sent: Monday, August 10, 2020 12:29:33 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: Sam

Last Name: Webb

Title: Board Member

Organization you are affiliated with: Texas Advisory Board of Cosmetology

Email:

City: Austin

State: Texas

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

I support the notion that a government license for Cosmetology does little to protect the public from harm as the scope of services generally are not dangerous activities even with an unskilled technician. Unlicensed certification courses could easily ensure that quality technicians were able to demonstrate their abilities as a reputable technician in an unfettered marketplace.

What needs to be addressed is how the practice of esthetics has rapidly expanded with technological advances. There are esthetics services that are by no means medical, nor taught in medical programs, but do pose some physical dangers to clients. TDLR should be either expanding the scope of esthetics and thus including training in the curriculum, or creating an "Advanced Esthetic" license. The practice of esthetics and the practice of medicine have a murky overlap that is expanding rapidly. The medical community is ill equipped nor overly relevant to esthetic/non-prescriptive services. They should not have jurisdiction when they provide no education on the treatments. I have a suggested alternative to help address this gap in the law with my submission here. The relatively new eyelash extension course was set at 320 hours for licensure. This is 40 times longer than the market place used to train on how to perform the eyelash extension service. The course is 8 times longer than the didactic laser hair removal course currently in Texas law. This is greatly out of balance.

Any Alternative or New Recommendations on This Agency: TDLR should expand the Cosmetology Esthetics license to offer an "Advanced Esthetics" License for the recent expansion of services in the market place. As the Sunset Advisory Committee correctly concluded the physical dangers of a basic facial or waxing are very low to the general consumer. Unfortunately the lengthy licensure program does little to protect from the services that are offered outside the scope of Esthetics. In fact the schools are prohibited from teaching these procedures as they are out of scope. Basic Esthetics should be taught but the hours to licensure should be focused strictly to the public safety and sanitation areas. If a person wants to offer dermaplaning, microneedling, permanent make up, cosmetic injections, photofacials, and beyond, then the 750 hour course should be tailored to those activities. A basic esthetic license to perform non-invasive facials, waxing or the like should be covered under a basic esthetic license or not required by law.

However, once a service is going to break or has the potential to overly heat the skin (chemically or physically) then

an Advanced Esthetics license should be in place to protect the public from harm.

My Comment Will Be Made Public: I agree