

Date: January 25, 2017

To: House Government Operations Committee

From: Stacey Savage, Technical Director, Obriens Aveda Institute, Obriens Salons.
Licensed Cosmetologist, Licensed Barber

RE: H.684

I thank the Chair for allowing me the opportunity to testify and share concerns for parts of this bill as written. Specifically, the Barbers and Cosmetologist segments starting on page 9 line 17 of H.684.

Let me first start with my qualifications and background. I have been a licensed Cosmetologist for almost 20 years. I am also a licensed Barber and the Technical Director of a School of Cosmetology and Barbering. I am also Certified and teach both Hair Color and Haircutting on a National level with Aveda, one of the leading product and education companies in the industry.

The specific concerns I bring to you are with regard to the changing of the amount of hours required for schooling for all domains covered under this profession.

These concerns include:

- Lowering Vermont's Education requirements will result in Vermont Students being undertrained and uncompetitive as compared to students from other states which would maintain more extensive training requirements.
- Lowering Vermont's Education requirements will deter out of state students from coming to Vermont to study in part because other states will not view their training as complete enough to take their licensure exams.
- This drastic decrease in Education requirement will impact public health and safety in that current programs extensively cover and require students to practice sanitation and public health related procedures.

§ 276(D) Inserts language and makes the proposed changes in hour requirements in this current bill as written. A summary of those changes in hours is as follows:

Cosmetology currently requires 1500 hours - * proposed decrease to 1000 hours

Barbering currently requires 1000 hours - * proposed decrease to 750 hours.

Esthetics currently requires 600 hours - * proposed decrease to 500 hours.

Nail Technician currently requires 400 hours - * proposed decrease to 200 hours.

I have attached a copy of hours required by state with Vermont being in the median of hours required. There are only 2 states currently requiring the proposed 1000 hours in Cosmetology, 2 more at 1200, one at 1250, 25 at 1500, 2 at 1550 and the rest up to 2300 hours. Clearly, limiting the hours in Cosmetology would greatly diminish the profession and put the Health and Safety of the public at risk as stated in the previous concerns.

For Barbering there are 9 states currently requiring the same 1000 hours that we do. By changing this to 750 hours we would be by far the lowest in the country.

Each licensed domain requires the applicant to take and pass according to part 5.2(a) for Barbering, part 6.2(a) for Cosmetology, part 7.2(a) for Esthetician, part 8.2(a) for Manicurists of the Board of Barbers and Cosmetologists Administrative Rules; the National written and practical exams as well as Vermont Laws and Rules exam.

These exams compiled at a National level are set up with a required amount of knowledge and skill needed to pass. By decreasing the required number of hours necessary, you will be drastically limiting the ability of the student to gain the required information in the time allotted. There are Nationally recognized text books used for these courses, all of which have recommended numbers of hours necessary to complete strictly the theory work. This does not include practical learning or mastering, safety and sterilization or sanitation. These are the most important parts of the learning as they directly affect the service, safety and health of the general public.

For Cosmetology as an example. Cutting the program length to 1000 hours would equate to a student losing 50% of their practical education. The learning requirements that a school must teach remain unchanged, therefore it would stay at approximately 500 hours of Theory necessary to complete the National Standard of bookwork, however the student will now only have 500 hours of hands on practical experience versus the current 1000 hours. Currently a student at 1000 hours is just beginning to gain the practical experience on guests and habits of a safe operator, honing those skills to be able to pass the State Board Exam happens in the final 500 hours.

The financial picture this will present for the student will drastically reduce the number of students able to attend schooling. I have included some breakdowns of estimated eligibility for Federal Financial Aid. The estimations are broken into *Dependent* and *Independent* categories. There are estimates for both the 1000 hour and 1500 hour program versions. As you will see, the biggest challenge presented is that the shorter program is now a 1 award year program, decreasing the amount of funds a student is eligible for in both grants and loans. The students would not be able to cover their tuitions and/or living expenses. The majority of the student body relies heavily on some form of Federal Student Aid, much of which will be vastly reduced even with a reduction in tuition to account for less hours. As you will see in the chart below, students now have within the combination of Federal Student Loans and Grants, excess funds which most use to help pay for living expenses while in school.

<u>Student Financial Scenario</u>	1500 hour Program <u>Unfunded Cost</u>	Proposed 1000 hour Program <u>Unfunded Cost</u>
Dependent Full Pell	\$972 CREDIT*	\$2,011
Independent Full Pell	\$7567 CREDIT*	\$1945 CREDIT*

*Credit can be taken as a refund for living expenses.

Pell Grants are reduced in the shorter program

You can see by the info above that the unfunded costs for students presents an unnecessary burden.

§ 273. Exemptions (7) inserted language that would open the opportunity to people doing services that are currently regulated and rightfully so based on safety and sanitation and protection of the general public. Specifically, what comes to mind is an unlicensed person doing shampoos and blowdrys using unsanitary and unregulated equipment and tools. Examples would be communicable diseases such as Hepatitis, MRSA or Tuberculosis that are spread through unsanitary sinks, brushes or conditions. Once again putting public welfare at risk.

§ 276.(E)(ii) inserted language that would change the current apprenticeship hours to limit them to 150% of the new hours structure. This again limits the amount of time spent in the learning environment. Although an apprentice must pass the same testing that someone attending a traditional school does, they are not in the same structured setting of learning and therefore must take longer to complete the programs given that they are simply in a watch and do training with VERY limited theory work. The further challenge is finding currently licensed and competent individuals to take on the responsibility of an apprentice. Currently all Cosmetology and Barber School Educators must be licensed to teach and have continuing education requirements. An individual taking on an Apprentice is not held to those same standards creating questionable and non-measurable education.

In summary, lowering the number of hours for Cosmetology, Barbering, Esthiology and Nail Technition would greatly put the student at a disadvantage as well as putting the public at risk.