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We the members of the Private Occupational School Board, imbued with authority over private occupational schools in the State of Colorado pursuant to Section 23-64-101, et seq., C.R.S. hereby issue the following statement with respect to proposed changes relating to the setting of curriculum for schools of cosmetology and barbering:

The Private Occupational School Board and the Division oversee the provision of occupational education by more than 360 schools offering a wide range of important occupational educational opportunities to Colorado's students. Approximately 81 of those occupational schools provide instruction in barbering, cosmetology, esthetics, hairstyling, and nail technician.

Historically, when the Private Occupational School Board has evaluated proposed schools and programs in these subjects it has relied on the important guidance provided by the Office of Barber and Cosmetology's Policy 14, in conjunction with the Office of Barber and Cosmetology's Licensure Rules. These two documents have heretofore provided much-needed insight into what subject areas and hours within those subject areas will best prepare these students to sit for and pass their respective licensure examination which is administered by the Office of Barber and Cosmetology, and to successfully transition into the workforce where they will perform services upon Colorado's citizens.

The Private Occupational School Board is therefore deeply concerned that the removal of required hours from each program of study's subject areas leaves the Board without critical guidance by which to evaluate proposed programs of occupational schools. In addition, it diminishes the likelihood that student-consumers will receive consistent and necessary training within each subject area, thus, decreasing the ability of students to transfer between schools or from state to state or to participate in cross-over programming. Moreover, the Board is concerned that students may be less likely to succeed on their licensure examination and less prepared for matriculation into the workforce.



In order to address these concerns, the Private Occupational School Board very respectfully urges that its colleagues with the Office of Barber and Cosmetology thoughtfully consider retaining both the subject areas and required hours for the subject areas within its Rules and Policy 14. Doing so will better serve Colorado students and citizens and provide significant guidance to the Board as it discharges its duties to review and approve occupational education. Furthermore, the Board would respectfully urge that in the absence of retaining set hours within each subject matter that the Office of Barber and Cosmetology at least consider including minimum hours for each subject matter. This inclusion of minimum hours will provide essential guidance to the Board in its statutory duties, afford students an increased likelihood of successfully passing their licensure examinations, and ultimately safeguard the public who will receive services from the occupational school students and future professionals.

The Board, in consultation with its subject matter experts, predicated upon conversations with its school owners, as well as, subsequent to a thorough review of the best practices utilized by other states in their oversight of occupational education within these industries, would respectfully request the inclusion of minimum hours within each program of studies' subject areas. A copy of the Board's suggestions for those minimum hours is attached hereto for the Office of Barber and Cosmetology's consideration. The Board believes that the inclusion of these minimum hours will enable their own thoughtful review of proposed programming, afford students access to analogous education across institutions, best prepare students to sit for licensure examinations, and to successfully navigate their future careers. To that end, the inclusion of the attached suggested, or other similar, minimum hours would be of tremendous benefit.



# Barber and Cosmetology Hours

## Barber

| Subject Area  | Credit Hours | Clock Hours | Proposed Minimum Hours |
|---|--------------|-------------|------------------------|
| *Treatment of Hair and Scalp                            | 2            | 60          | 45                     |
| Facial Massage and Treatments                           | 3            | 90          | 67.5                   |
| Shaving   | 3            | 90          | 67.5                   |
| Haircutting   | 9            | 270         | 202.5                  |
| Hairstyling   | 9            | 270         | 202.5                  |
| Permanent Waving & Chemical Hair Relaxing               | 8            | 240         | 180                    |
| *Haircoloring   | 8            | 240         | 180                    |
| Law, Rules & Regulations                                | 1            | 30          | 22.5                   |
| Management, Ethics, Interpersonal Skills & Salesmanship | 1            | 30          | 22.5                   |
| Disinfection, Cleaning & Safe Work Practices            | 6            | 180         | 135                    |
| <b>TOTAL</b>  | <b>50</b>    | <b>1500</b> | <b>1125</b>            |

## Cosmetology

| Subject Area  | Credit Hours | Clock Hours | Proposed Minimum Hours |
|---|--------------|-------------|------------------------|
| Shampooing, Rinsing & Conditioning                      | 2            | 60          | 37                     |
| *Haircoloring   | 8            | 240         | 149                    |
| Haircutting   | 8            | 240         | 149                    |
| Hairstyling   | 7            | 210         | 130                    |
| Chemical Texture Services                               | 4            | 120         | 74                     |
| Manicuring & Pedicuring                                 | 7            | 210         | 130                    |
| Application of Artificial Nails                         | 5            | 150         | 99                     |
| Facials & Skin Care                                     | 7            | 210         | 130                    |
| Facial Makeup   | 1            | 30          | 18                     |
| Hair Removal  | 3            | 90          | 56                     |
| Law, Rules & Regulations                                | 1            | 30          | 18                     |
| Management, Ethics, Interpersonal Skills & Salesmanship | 1            | 30          | 18                     |
| Disinfection, Cleaning & Safe Work Practices            | 6            | 180         | 112                    |
| <b>TOTAL</b>  | <b>60</b>    | <b>1800</b> | <b>1120</b>            |

## Esthetician

| Subject Area  | Credit Hours | Clock Hours | Proposed Minimum Hours |
|---|--------------|-------------|------------------------|
| Facials & Skin Care                                     | 7            | 210         | 157.5                  |
| Facial Makeup   | 1            | 30          | 22.5                   |
| Hair Removal  | 3            | 90          | 67.5                   |
| Law, Rules & Regulations                                | 1            | 30          | 22.5                   |
| Management, Ethics, Interpersonal Skills & Salesmanship | 1            | 30          | 22.5                   |
| Disinfection, Cleaning & Safe Work Practices            | 7            | 210         | 157.5                  |
| <b>TOTAL</b>  | <b>20</b>    | <b>600</b>  | <b>450</b>             |

### Hairstylist

| Subject Area  | Credit Hours | Clock Hours | Proposed Minimum Hours |
|---|--------------|-------------|------------------------|
| Shampooing, Rinsing & Conditioning                      | 2            | 60          | 45                     |
| Haircoloring  | 8            | 240         | 180                    |
| Haircutting   | 8            | 240         | 180                    |
| Hairstyling   | 7            | 210         | 157.5                  |
| Chemical Texture Services                               | 4            | 120         | 90                     |
| Law, Rules & Regulations                                | 1            | 30          | 22.5                   |
| Management, Ethics, Interpersonal Skills & Salesmanship | 1            | 30          | 22.5                   |
| Disinfection, Cleaning & Safe Work Practices            | 9            | 270         | 202.5                  |
| <b>TOTAL</b>  | <b>40</b>    | <b>1200</b> | <b>900</b>             |

### Nail Technician

| Subject Area  | Credit Hours | Clock Hours | Proposed Minimum Hours |
|---|--------------|-------------|------------------------|
| Manicuring & Pedicuring                                 | 7            | 210         | 157.5                  |
| Application of Artificial Nails                         | 5            | 150         | 112.5                  |
| Law, Rules & Regulations                                | 1            | 30          | 22.5                   |
| Management, Ethics, Interpersonal Skills & Salesmanship | 1            | 30          | 22.5                   |
| Disinfection, Cleaning & Safe Work Practices            | 6            | 180         | 135                    |
| <b>TOTAL</b>  | <b>20</b>    | <b>600</b>  | <b>450</b>             |

\* The most recent publicly available draft of the Proposed Rules appears to eliminate these three subject areas. DPOS is unsure of whether the exclusion of these particular subject matters was intentional or accidental. However, DPOS has included the same in this Attachment and also included suggested minimum hours for these important subjects for OBC's consideration.