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C/O Ms. Susan E. Rineer, Chairperson
Office of Chief Counsel
State Board of Cosmetology
2601 North Third Street PO Box 2649
Harrisburg, PA 17105-2649

2008 SEP 15 AM 9:07

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Susan:

This letter is in response to the final revisions of the regulations of Act 99 with regards to natural hairbraiding.

I appreciate the Board for considering the concerns for natural hairbraiding that I have submitted. I am noted on the public comments as Lisa Hopkins, a Cosmetology teacher, presently I am also an expert and consultant for natural braiding techniques.

My consulting company is representing hundredths of braiders from the Hairbraider's Association of Philadelphia and Vicinity.

According to the civil rights and discrimination clause, we are requesting that the theory portion of the natural hair braiding examinations be available in French as the cosmetology theory exam is now available in Spanish and Vietnamese.

We also are requesting that licensed hairbraiding proctors for the practical portion of the exam should be fluent in French and English.

There should be consideration for employment of licensed hairbraiders that are bilingual in French and English to be proctors and state inspectors as well.

According to 7.43 (relating to expiration and renewal of licenses) **150 Grandfathering of Natural Hairbraiding**

There is only one beauty school in Norristown that is approved to offer the 150 grandfathering course, and this presents a total inconvenience for braiders that reside in Philadelphia and this amendment is **discriminating**.

With the present economic situation, this presents a hardship because the costs of gas and mileage expenses.

There is not been any information available of any beauty schools in Philadelphia who are willing to offer the grandfathering course.



Until additional schools in Philadelphia have been approved to offer the grandfathering hours of 150, natural hair braiders should not have their licenses revoked or suspended.

In 7.71c. (**Relating to equipment and supplies for a natural hair braiding salon**)

The individual case by case basis is vague and can be unpredictable according to how an inspector feels that particular day.

As it regards to shampooing equipment, it should be finally regulated that if there are less than three hairbraiders that are employed per braiding salon, then one shampoo sink and hooded dryer or blow dryer should be suffice.

If there are more than three hair braiders, the number should be increased to two sinks and hooded dryers per more three natural hairbraiders.

I thank the Board for considering the finishing techniques of applying thermal curling and straightening via ceramic iron or straightening comb services for weaving. This should be added to the natural hairbraiding curriculum for the 150 and 300 hours to be broken down for an additional **10 hours** of instruction in thermal curling and thermal straightening.

In 7.129(**relating to curriculum requirements**)

There should be some form of consideration of adding **twenty-five hours** within the 1,000 hour requirement of instruction for the 1,250 hour cosmetology curriculum for braiding, locing and weaving techniques. This is extremely imperative because you have licensed cosmetologists who perform these services.

In (ii) Specifying the term not including **cutting of the hair** or the application of dyes, reactive chemicals or other preparations to alter the color, or to straighten, curl, or alter the structure of hair.

The natural hair braider should be permitted to **only cut the braid extensions** and/or sewn **weave -in extension** without cutting the client's own natural hair. You cannot accurately finish styling braids, or a weave with thermal curling or thermal straightening if the weave or extensions are left uneven. This is not uniform.

According to the PA Child Labor Laws and Department of Education and to prevent Human and Child trafficking, **no child under 17 years old** should be present in any salon during school hours and should require working permits and physician's documents to conduct hairbraiding, cosmetology, esthetics and manicuring services after school hours and on the weekends only. These children should be fairly compensated and not used as indentured servants or slave/sweatshop labor.

There has been a major concern from licensed cosmetologists who have stated that no licensed braider can perform hair weaving services that requires the following services:

Bonding

Gluing

Fusion extensions

Strand to strand extensions applied with heating or gluing implements

Lace wigs or weaves with adhesive applications

Micro-link extensions

Non-surgical hair replacement with prosthetic hair pieces.

Braiders can perform weaving services that only require braiding and sewing in tracks or bulk hair with a needle, net and thread.

However they can use hot water, thermal braid singe or a lighter and perm rods to finish, or create a temporary curl or wave pattern to complete the braiding style.

In 7.31(relating to examination prerequisite for licensure; exceptions)

The application to take the state board examination should have an area where an immigrant natural hair braider, or manicurist, and cosmetologist would have to prove legal immigration statuses with photo identification documents via passports, green cards, or permanent residential statuses. All salons businesses and school owners should have a separate business privilege license from their specific PA counties.

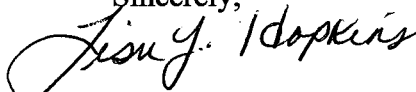
The members of the Hairbraiders' Assn. need further information of how a braider can apply for grants or loans to pay for their school tuition for the 150 and 300 hours.

My consultant services is engaging in efforts to help increase the number of grandfathering applicants, and empowering those to be in compliance with Act 99.

I would appreciate a list of beauty schools in Philadelphia who are going to offer the 150 and 300 hour natural hairbraiding courses.

I thank you for your attention to these concerns.

Sincerely,



Lisa Y. Hopkins, CEO
The Kama-Sahlor Group

cc.

Ms. Michaele A. Totino and Scott Schalles, IRRC
Amalde Balde, President of Hairbraiders' Assn. of Phila.
Shirley Randleman, President PBS