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Sept 22, 2007
State Board of Cosmetology
C/o Ms. Hilarene Staller
PO Box 2649
Harrisburg, PA 17105-2649

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Hilarene Staller,

As a stake holder for the rules regarding the limited license for hairbraiding, I have concerns that I would like the state board members to please consider.

Within 2 years of the initial issuance of a natural hair braider license issued without examination under § 7.31(c) (relating to examination prerequisite for licensure; exceptions), the natural hair braider licensee shall provide to the Board proof that the licensee has completed **150 hours of education** from a licensed school of cosmetology as a condition of renewal of the license. The 150 hours of education must include, at a minimum:

- (1) 75 hours in scalp care.
- (2) 50 hours in hygiene.
- (3) 25 hours in occupational safety, the provisions of the act and this chapter

******If a braider who qualifies to partake in the grandfathering requirements does not have skills in the locking, and weaving areas, or vice versa, could those manipulative skills be offered within the 75 hours of scalp care?***

My strongest concern is the **work done by students on the public.**

(a) A school may permit students who have completed at least 300 hours of instruction to work on the public, if the charges for the students' services are based on the reasonable cost of materials used on the client only.

*****I remember the requirement of completing the 300 hours before engaging in clinical services to the public was an issue of the members at the PAPSA conference who are also stakeholders.***

How can braider obtain practice on the clinical area of providing braiding services to the public, if the student would have to complete the 300 hours?

I see how this can be beneficial to the cosmetology student, but not the braiding student who will need clinical experience before they complete the 300 hours. It should be recommended that students should complete at least 150 hours before they can perform services on the public.

There is a concern within the teaching curriculum of performing the manipulative skills within the 500 hour requirements for the hairbraiding teaching or licensed cosmetology teacher that can teach hairbraiding.

******A licensed cosmetology teacher that lacks experience or prior training in the manipulative skills of braiding, locking or weaving, should not be qualified to teach the skills that are needed for hairbraiding.***

I have witnessed at various schools that a student was used to perform braiding, and locking demonstrations in front of the beauty school students for the teacher. This should be prohibited unless it is a student enrolled in the hairbraiding teacher program that is assigned to assist the teacher.

A licensed cosmetology teacher or hairbraiding teacher should have prior braiding, locking and weaving experience and/or certified training before they are qualified to teach hairbraiding.

The listed equipment for the hairbraiding salon states that a braiding salon should increase the equipment for each additional licensed braider.

******There is a concern about the shampoo bowl or basin. The state board members should please consider that there should be just one shampoo bowl or basin required even if there are additional braiders. For one, most braiders require their clients to be previously shampooed before hairbraiding services are rendered because it takes long hours to braid.***

Having more than one shampoo bowl will cause a financial hardship to most of the African braiders and a space situation in their salons.

I also needed to know if heat from using a straightening comb or ceramic iron to temporarily change the texture of hair for possible weaving purposes is permissible

I thank the state board members towards their attention to these concerns.

Sincerely,


Lisa Y. Hopkins