

**WEST VIRGINIA
SECRETARY OF STATE
NATALIE E. TENNANT
ADMINISTRATIVE LAW DIVISION**

Form #3

Do Not Mark In This Box

2010 JUL 30 PM 1:16

OFFICE OF THE
SECRETARY OF STATE
STATE OF WEST VIRGINIA

**NOTICE OF AGENCY APPROVAL OF A PROPOSED RULE
AND
FILING WITH THE LEGISLATIVE RULE-MAKING REVIEW COMMITTEE**

AGENCY: Board of Barbers and Cosmetologists TITLE NUMBER: 3CSR2

CITE AUTHORITY: 30-27-5

AMENDMENT TO AN EXISTING RULE: YES NO


IF YES, SERIES NUMBER OF RULE BEING AMENDED: 2

TITLE OF RULE BEING AMENDED: Qualification, Training, Examination of Licensure of Instructors

IF NO, SERIES NUMBER OF RULE BEING PROPOSED: _____

TITLE OF RULE BEING PROPOSED: _____

THE ABOVE PROPOSED LEGISLATIVE RULE HAVING GONE TO A PUBLIC HEARING OR A PUBLIC COMMENT PERIOD IS HEREBY APPROVED BY THE PROMULGATING AGENCY FOR FILING WITH THE SECRETARY OF STATE AND THE LEGISLATIVE RULE-MAKING REVIEW COMMITTEE FOR THEIR REVIEW.


Authorized Signature

TITLE 3
LEGISLATIVE RULES
BOARD OF BARBERS AND COSMETOLOGISTS

2010 JUL 30 PM 1:16

SERIES 2
QUALIFICATIONS, TRAINING, EXAMINATION AND
CERTIFICATION OF INSTRUCTORS IN BARBERING AND BEAUTY CULTURE

SECRETARY OF STATE
STATE OF WEST VIRGINIA

§ 3-2-1. General

- 1.1. Scope - This legislative rule establishes the qualifications, training, examination and certification of both instructors and master instructors in schools of barbering or beauty culture which have been promulgated by the Board of Barbers and Cosmetologists (hereinafter Board).
- 1.2. Authority - W. Va. Code § 30-27-5. Related § 30-27-6 et seq.
- 1.3. Filing Date - April 13, 2010
- 1.4. Effective Date - July 1, 2010

§ 3-2-2. General Qualifications for Licensure as an Instructor

- 2.1. An individual seeking certification must:
 - 2.1.1. Be at least nineteen (19) years of age;
 - 2.1.2. Be of good moral character and of temperate habits;
 - 2.1.3. Have a high school diploma, GED, or "ability to benefit" test approved by the United States Department of Education;
 - 2.1.4. Have graduated from a recognized school of barbering or beauty culture;
 - 2.1.5. Have submitted an application to the Board with the appropriate fees. All material attached to the application becomes the property of the Board;
 - 2.1.6. Have passed an examination and other reasonable requests administered approved by the Board consisting of a written, oral and demonstrative section including subject areas adopted by the Board with at least a 70% pass percentage.
 - 2.1.7. Have completed 375 hours of instructor's training as stated in Table 3-2A in this rule.
 - 2.1.8. Submit an application to the Board to include, but not limited to Name, address, email, telephone number, education background, professional background, professional recommendation from school

owner/manager, and any other document to establish identity ~~or~~ and professional capabilities.

- 2.1.9. Submit a letter from a school owner or manager certifying that the applicant has completed 375 hours of instructor training and attesting to the applicant's professional capabilities.
- 2.1.10. ~~Present a portfolio to include, but not limited to photos of hairstyles performed or created, lesson plans, letters of past students or instructors, list of goals or ambitions, and other information pertaining to the industry. Present an outline/list of subjects taught during 375 hour instructor training period.~~
- 2.1.11. ~~Have passed a practical presentation, written, and oral skills test with a 70% or higher pass rate and have trained under a master instructor.~~
- 2.1.12. Have had an active license in the subject or specialty wishing to teach for one year.
- 2.1.13. Pay all applicable certification, examination, and registration fees.

3-2-3 General Qualifications for Certification as a Master Instructor

- 3.1 An individual seeking certification as a master instructor in a school of barbering and/or beauty culture must complete one of the following three tracks to master instructor licensure:

TRACK #1

- 3.1.1. Be at least twenty-two (22) years of age with all prerequisites mentioned in the Qualifications for Certification as an Instructor.
- 3.1.2. Complete fifteen (15) hours of college credits from a degree granting institution or junior college in collaboration with Table 3-2C.
- 3.1.3. Complete 375 hours of instructor training.
- 3.1.4. Have three (3) years experience as an instructor in beauty culture.
- 3.1.5. Submit an application to the Board to include, but not limited to Name, address, email, telephone number, education background, professional background, professional recommendation from school owner/manager, and any other document to establish identity or professional capabilities.
- 3.1.6. Submit a letter from a school owner or manager certifying that the applicant has completed 375 hours of instructor training and attesting to the applicant's professional capabilities and employment and instructing experience.
- 3.1.7. ~~Present a portfolio to include, but not limited to photos of hairstyles performed or created, lesson plans, and other information~~

pertaining to the industry. Present an outline/list of subjects taught during 375 hour instructor training period.

- 3.1.8. Have passed a practical presentation, written, and oral skills test with a 70% or higher pass rate and have trained under a master instructor.
- 3.1.9. Have an active license in the subject or specialty wishing to teach.
- 3.1.10. Pay all applicable certification, examination, and registration fees.
- 3.1.11. Meet any other applicable and reasonable request of the Board or the Director of the Board in direct relation to teaching or practical knowledge set forth by the Board or the Director.

TRACK #2

- 3.2.1. Complete 375 hours of instructor training.
- 3.2.2. Have seven (7) years experience as an instructor in beauty culture.
- 3.2.3. Submit an application to the Board to include, but not limited to Name, address, email, telephone number, education background, professional background, professional recommendation from school owner/manager, and any other document to establish identity or professional capabilities.
- 3.2.4. Submit a letter from a school owner or manager certifying that the applicant has completed 375 hours of instructor training and attesting to the applicant's professional capabilities and employment and instructing experience.
- 3.2.5. Present an outline/list of subjects taught during employment as an instructor.
- 3.2.6. Have passed a practical presentation, written, and oral skills test with a 70% or higher pass rate and have trained under a master instructor
- 3.2.7. Have an active license in the subject or specialty wishing to teach.
- 3.2.8. Pay all applicable certification, examination, and registration fees.

3.2.9 Meet any other applicable and reasonable request of the Board or the Director of the Board in direct relation to teaching or practical knowledge set forth by the Board or the Director.

TRACK #3

3.3.1. Complete 375 hours of instructor training.

3.3.2. Have fifteen (15) years of licensed experience in beauty culture.

3.3.3. Submit an application to the Board to include, but not limited to Name, address, email, telephone number, education background, professional background, professional recommendation from school owner/manager, and any other document to establish identity or professional capabilities.

3.3.4. Submit a letter from a school owner or manager certifying that the applicant has completed 375 hours of instructor training and attesting to the applicant's professional capabilities and employment and instructing experience.

3.3.5. Present an outline/list of subjects taught during employment as an instructor.

3.3.6. Have passed a practical presentation, written, and oral skills test with a 70% or higher pass rate and have trained under a master instructor

3.3.7. Have an active license in the subject or specialty wishing to teach.

3.3.8. Pay all applicable certification, examination, and registration fees.

3.3.9 Meet any other applicable and reasonable request of the Board or the Director of the Board in direct relation to teaching or practical knowledge set forth by the Board or the Director.

3.24. An instructor certification must be renewed annually or biennially on or before January 1.

3.35. Every person certified in any capacity as an instructor or master instructor in this State must keep his or her original or renewed certificate posted conspicuously in the school wherein they are employed.

§ 3-2-4. Additional Requirements for Certification as an Instructor.

- 4.1. All barber and beauty school owners who expect to employ an instructor shall properly interview the applicant and make a recommendation to the Board, in writing, concerning their knowledge of such applicant's abilities. This recommendation shall accompany the student's application for licensure as an instructor. School owners must submit annual progress reports on all instructors employed in their barber or beauty school to the Board.
- 4.2. All student instructors must sit for each exam for which they are eligible.
- 4.3. All examinees that have not successfully passed the examination for licensure as a master instructor or instructor in two attempts, before resuming teaching duties, must meet any other applicable and reasonable request of the Board in direct relation to teaching or practical knowledge set forth by the Board.

§ 3-2-5. Additional Educational Requirements for Certification as a Master Instructor

- 5.1. The minimum required college subjects and hours for master instructors are specified in Table 3-2C of this rule. A minimum of three hundred seventy five hours (375) clock hours is required.
- 5.2. All applicants to become master barber instructors must complete an additional one hundred (100) hours of training in permanent waving and pass an examination administered by the Board. The curriculum which is specified in Table 3-2B must be taught by a master beauty instructor or a master barber instructor who has the required one hundred (100) hours. This section applies to only 1800 hour barber graduates.
- 5.3. The first five (5) courses listed in Table 3-2C of this rule may be taken in any junior college, or degree-granting institution approved by the West Virginia State Board of Trustees. These courses may be taken either on campus or as extension courses or any other means officially approved by the degree-granting institution. The student shall report the credit received to the Board by evidence of an official school transcript.

§ 3-2-6. Renewal of Certification as an Instructor or Master Instructor

- 6.1. Continuing education requirements must be completed in order to receive certificate renewal.
- 6.2. The renewal requirements for instructors represent minimum standards for teacher training. In order to maintain well-trained teachers, the Board recommends that an "In-Service" training program be conducted in both the schools of barbering and of beauty culture in the art of teaching.
- 6.3. The applicant for renewal must submit the appropriate fee as specified in 3 CSR 6.

§ 3-2-7. Reciprocity

- 7.1. An applicant from another state seeking certification as an instructor or master instructor is eligible for certification by reciprocity if the applicant has acquired training in another state equal to the requirements established in this rule for the respective certificate requested: Provided, that the state in which said applicant is certified extends the same privilege to certified instructors from this state.

§ 3-2-8. Revocation of Certificate

- 8.1. The certificate of a student or master instructor in barbering or beauty culture may be revoked or suspended by the Board for any reason specified in W. Va. Code § 30-27-1 et seq.
- 8.2. Any person who is certified as a student or master instructor has been suspended or revoked for good and sufficient reasons, including incompetency or gross neglect in teaching barbering or beauty culture, may at the discretion of the Board, be entitled to practice barbering or beauty culture in this State.

§ 3-2-9. Administrative Due Process

- 9.1. Those persons adversely affected by the enforcement of this rule have the right to request a hearing in a manner pursuant to the provisions of W. Va. Code § 30-27-20 et seq.

TABLE 3-2A. 375 Hour Curriculum for Student Instructors

<u>SUBJECTS</u>	<u>HOURS</u>
1. Orientation	10
2. Psychology of Student Training	15
3. Introduction to Teaching	20
4. Good Grooming and Personality Development	10
5. Course Outlining and Development	15
6. Lesson Planning	30
7. Teaching Techniques (Methods)	40
8. Teaching Aids - Audio-Visual Techniques	20
9. Demonstration Techniques	30
10. Examination and Analysis	20
11. Classroom Management	15
12. Record Keeping	10
13. Teaching Observation	40
14. Teacher Assistant	40
15. Pupil Teaching (Practice Teaching)	60
TOTAL	375

TABLE 3-2B. 100 Hour Curriculum for Barber Instructors to Qualify to Teach Permanent Waving

	THEORY & LECTURE	DEMONSTRATION	PRACTICE	TOTAL HOURS
1. Hair Structure	2			2
2. Chemistry: Physical & Chemical Action	4			4
3. Permanent Waving Scalp & Hair Analysis	10	10	20	40
4. Razor Shaping & Procedures	4	4	10	18
5. Hairstyling	10	8	18	36
TOTAL	30	22	48	100

TABLE 3-2C. Required College Subjects and Hours for Master Instructors

<u>SEMESTER SUBJECTS</u>	<u>HOURS</u>	<u>CLOCK HOURS</u>
*Psychology of Learning	2-3	30-45
*Methods of Teaching	2-3	30-45
*Methods of Examination	2-3	30-45
*Public Speaking	2-3	30-45
English Composition	2-3	30-45
Teacher Education Orientation	2-3	30-45
Introduction to Vocational Education	2-3	30-45
Occupational Analysis	2-3	30-45
Course Construction	2-3	30-45
Safety in Vocational Education	2-3	30-45
Organization and Management	2-3	30-45
**Summer Short Course		30
**Seminar	<u>50</u>	
TOTAL	410-575	

*Required courses

**Requires prior approval of the Board



Joe Manchin III
Governor

Adam L. Higginbotham
Director

State of West Virginia
Board of Barbers and Cosmetologists
1201 Dunbar Ave.
Dunbar, WV 25064
Telephone: 304-558-2924
Fax: 304-558-3450
www.wvbhc.org

Board Members
Michael Balcher
Justina Gabbert
Sarah Hamrick
Paula Kurczak
Susan Poveromo
Jim Ryan
Rick Stache

TO: SECRETARY OF STATE NATALIE TENNANT
FROM: ADAM L. HIGGINBOTHAM, DIRECTOR, BOARD OF BARBERS AND COSMETOLOGISTS
SUBJECT: 3 CSR
DATE: 6/17/2010

The attached proposed rule changes are needed to create more master instructors in the State of West Virginia by providing experienced individuals the opportunity to teach in a school of beauty culture.

As of May 2010, West Virginia has 58 master instructors with the average age of 57.3. The reason for the low number of master instructors could be that it takes 4 ½ years or more to obtain master instructor status. Additionally, the time to be able to be a master instructor in the beauty industry takes longer than an individual wishing to teach in elementary school. Therefore, additional tracks to master instructor status are needed to save the title of master instructor.

The Board is proposing two additional tracks or options to obtain master instructor status. Under the current track, there are near 10 individuals that are close to master instructor status in the state. The key backlash to this track is the 15 college credit hours requirement. In the two additional tracks, the Board is wishing to replace the 15 college credit hours with different requirements.

In track #2, the Board wishes to replace the 15 college credit hours with 10 years of experience as an instructor. This change will open the door to 10-20 individuals wishing to become master instructors.

In track #3, the Board wishes to replace the 15 college credit hours with 15 years of licensed experience in the beauty industry. This change will open the door for more people to become master instructors.

Although these changes will allow the possibility for more people to become master instructors, which are important for the cap on enrollment numbers, all individuals wishing to become a master instructor will still be required to complete the 375 hour instructor training and sit for the instructor and master instructor examination.

Without this change, many public and private beauty schools in the State of West Virginia will be required to close down due to failure to abide by the master instructor requirements in our rules and regulations.

Sincerely,

Adam L. Higginbotham, Director

APPENDIX B

FISCAL NOTE FOR PROPOSED RULES

Rule Title: Qualification Training Examination of Licensure of Instructors

Type of Rule: Legislative Interpretive Procedural

Agency: Board of Barbers and Cosmetologists

Address: 1201 Dunbar Avenue
Dunbar, WV 25064

Phone Number: 304-558-2924 Email: wvbbc@wv.gov

Fiscal Note Summary

Summarize in a clear and concise manner what impact this measure will have on costs and revenues of state government.

NA

Fiscal Note Detail

Show over-all effect in Item 1 and 2 and, in Item 3, give an explanation of Breakdown by fiscal year, including long-range effect.

FISCAL YEAR			
Effect of Proposal	Current Increase/Decrease (use "-")	Next Increase/Decrease (use "-")	Fiscal Year (Upon Full Implementation)
1. Estimated Total Cost	0.00	0.00	0.00
Personal Services	0.00	0.00	0.00
Current Expenses	0.00	0.00	0.00
Repairs & Alterations	0.00	0.00	0.00
Assets	0.00	0.00	0.00
Other	0.00	0.00	0.00
2. Estimated Total Revenues	0.00	0.00	0.00

Rule Title: Qualification Training Examination of Licensure of Instructors

Rule Title: _____

3. **Explanation of above estimates (including long-range effect):**
Please include any increase or decrease in fees in your estimated total revenues.

NA

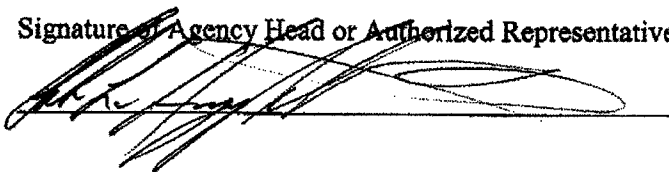
MEMORANDUM

Please identify any areas of vagueness, technical defects, reasons the proposed rule would not have a fiscal impact, and/or any special issues not captured elsewhere on this form.

This rule has no fiscal impact.

Date: 6/17/2010

Signature of Agency Head or Authorized Representative



QUESTIONNAIRE

(Please include a copy of this form with each filing of your rule: Notice of Public Hearing or Comment Period; Proposed Rule, and if needed, Emergency and Modified Rule.)

DATE: 7/30/2010

TO: LEGISLATIVE RULE-MAKING REVIEW COMMITTEE

FROM: (Agency Name, Address & Phone No.) Board of Barbers and Cosmetology
1201 Dunbar Avenue
Dunbar, WV 25064
304-558-2924

LEGISLATIVE RULE TITLE: Qualifications, Training, Examination and Certification of
Instructors in Barbering and Beauty Culture

1. Authorizing statute(s) citation 30-27-5

2. a. Date filed in State Register with Notice of Hearing or Public Comment Period:
6/18/2010

b. What other notice, including advertising, did you give of the hearing?
Posting on www.wvbbc.org

c. Date of Public Hearing(s) *or* Public Comment Period ended:
7/22/2010

d. Attach list of persons who appeared at hearing, comments received, amendments, reasons for amendments.

Attached X No comments received

- e. Date you filed in State Register the agency approved proposed Legislative Rule following public hearing: (be exact)

7/30/2010

- f. Name, title, address and phone/fax/e-mail numbers of agency person(s) to receive all *written correspondence* regarding this rule: (Please type)

Adam L. Higginbotham

Director

304-558-2924

- g. **IF DIFFERENT FROM ITEM 'f'**, please give Name, title, address and phone number(s) of agency person(s) who wrote and/or has responsibility for the contents of this rule: (Please type)

NA

3. If the statute under which you promulgated the submitted rules requires certain findings and determinations to be made as a condition precedent to their promulgation:

- a. Give the date upon which you filed in the State Register a notice of the time and place of a hearing for the taking of evidence and a general description of the issues to be decided.

NA

b. Date of hearing or comment period:

NA

c. On what date did you file in the State Register the findings and determinations required together with the reasons therefor?

NA

d. Attach findings and determinations and reasons:

Attached NA

Higginbotham, Adam L

From: Joe Mamone [joe@scottcollegeofcosmetology.edu]
Sent: Thursday, July 22, 2010 5:14 PM
To: Higginbotham, Adam L
Subject: Proposed changes 1, 2 & 4

Dear Adam Higginbotham,

I am writing in regards to proposed changes 1, 2 & 4. I have read all 3 and have found nothing in any of the 3 that I would be opposed to.

I do want to say that even though I am not opposed to proposal 4 as I do feel it will be better than as currently written I want to take this opportunity to say that I am opposed to the 2 tier instructor status in West Virginia. I feel the proposed changes will make more people eligible to test for a masters license but I see no useful advantage to the masters instructor status and I also feel that being a successful hairdresser for 15 years certainly does not guarantee that that individual would make a good instructor.

I want to go on record and say that in my opinion the best thing for the industry in West Virginia would be to switch back to a 1 tier instructor license. I have research the licensing of instructors though out the United States and cannot find another state that requires a 2nd tier level instructor to be able to operate a school of cosmetology.

Thank you for this opportunity to express my opinion.

Sincerely,

Joe Mamone
Scott College of Cosmetology
1502 Market Street
Wheeling, WV. 26003



Joe Manchin III
Governor

Adam L. Higginbotham
Director

State of West Virginia
Board of Barbers and Cosmetologists

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Susan Poveromo
Jim Ryan
Rick Stache

Joe Mamone
Scott College of Cosmetology
1502 Market Street
Wheeling, WV 26003

July 28th, 2010

Dear Mr. Mamone,

On behalf of the Board I would like to thank you for your response to the proposed rule changes posted on our website for the upcoming 2011 legislative session.

I definitely concur with your opinion that being a hairdresser for fifteen (15) years will not guarantee that the individual would make a good instructor. I would even venture to state that the completion of any three tracks or options to master instructor status would guarantee an individual being a good instructor. The main reasons for trying to create additional tracks or options to obtain master instructor status are to create more master instructors to replenish their decreasing numbers and to increase the opportunities of individuals with different life experiences to provide valuable insight professionally and educationally to neophytes in the beauty industry.

As for the request to eliminate the two-tiered system of instructors in West Virginia (instructor and master instructor), there are many that agree with your opinion. At this time the Board has three rules open for proposed changes. The rules covering master instructors include four different rules. Therefore, if the Board would choose to propose the elimination of the master instructor program in the current three rules that mention the master instructors, one rule would still mention the master instructor program causing our rules to be inconsistent. Since the four different rules would not be in unison we could not proceed with a proposed elimination of the two-tiered system for the 2011 legislative session.

If the elimination of the two-tiered system of instructors is important to the industry or your business growth, I strongly encourage your input at a board meeting during the February, March, April, May months of 2011.

Again, I would like to thank you for your participation and input for the proposed rule changes.

Sincerely,

Adam L. Higginbotham
Director

Higginbotham, Adam L

From: catherine belvin [hsbcbeauty@yahoo.com]
Sent: Monday, July 19, 2010 3:27 PM
To: Higginbotham, Adam L
Subject: Comment on proposed new rules

This e-mail is in reference to the proposed rule changes under 30-27-5 subject 3 CSR2. I agree with the need for more Master Instructors, however; it seems as though part of your argument is the amount of time it takes to become a Master Instructor versus that of an elementary school teacher. If so, then why not change the amount of years under track #2 to 4 or 5 years minimum as an experienced Instructor, thus allowing an even wider range of Instructors to become Master Instructors. In addition, track#3 makes no sense at all, because what you are saying is that someone who has held a license in the industry for 15yrs can become a Master Instructor. Just because you have been licensed for 15 years does not mean you have an ability to teach or practice Cosmetology behind the chair. I believe this is going to create a large problem with 'uneducated educators'. The other problem with this track is that if you have a person who receives their license for Cosmetology at age 35, this would mean they couldn't get their Masters until age 50. What's not fair, is that if an Instructor has been working in the teaching industry for at least 5 yrs but less than 10 , then another party who has only been working behind the chair for 15 yrs (and never taught) can come take the masters exam after only 375 hours at a school. This seems like a slap in the face to the person who has dedicated their time to teaching.

Respectfully,
Catherine Belvin
Owner/Director
Huntington School Of Beauty Culture
5636 us rt 60 east
suite 2
Huntington, WV 25705
304-736-6289



Joe Manchin III
Governor

Adam L. Higginbotham
Director

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Catherine Belvin
Huntington School of Beauty Culture
5636 US RT 60 East, Suite 2
Huntington, WV 25705

July 28th, 2010

Dear Ms. Belvin,

On behalf of the Board I would like to thank you for your response to the proposed rule changes posted on our website for the upcoming 2011 legislative session.

I certainly agree that having a license for fifteen (15) years does not mean that an individual has the ability to teach any more than any of the other two proposed tracks or options to master instructor status. There are safeguards that consist of examinations to ensure the knowledge of a prospective instructor. The purpose for the additional tracks or options is to increase the prospective pool of both instructor licenses for schools to choose the best qualified candidates in lieu of what is "just available" due to our shortage of master instructors in the state.

In reply to the comment concerning 'uneducated educators', each individual will still have to complete the student instructor training, pass an instructor exam, and pass a master instructor exam. The examination criteria for instructors and master instructors will be the same regardless of the track or option an individual chooses to become a master instructor. To better explain the process I have enclosed a copy of a flow chart.

As for your request to reduce the years of instructor experience for track or option #2, the Board has determined to lower the years from ten (10) to seven (7).

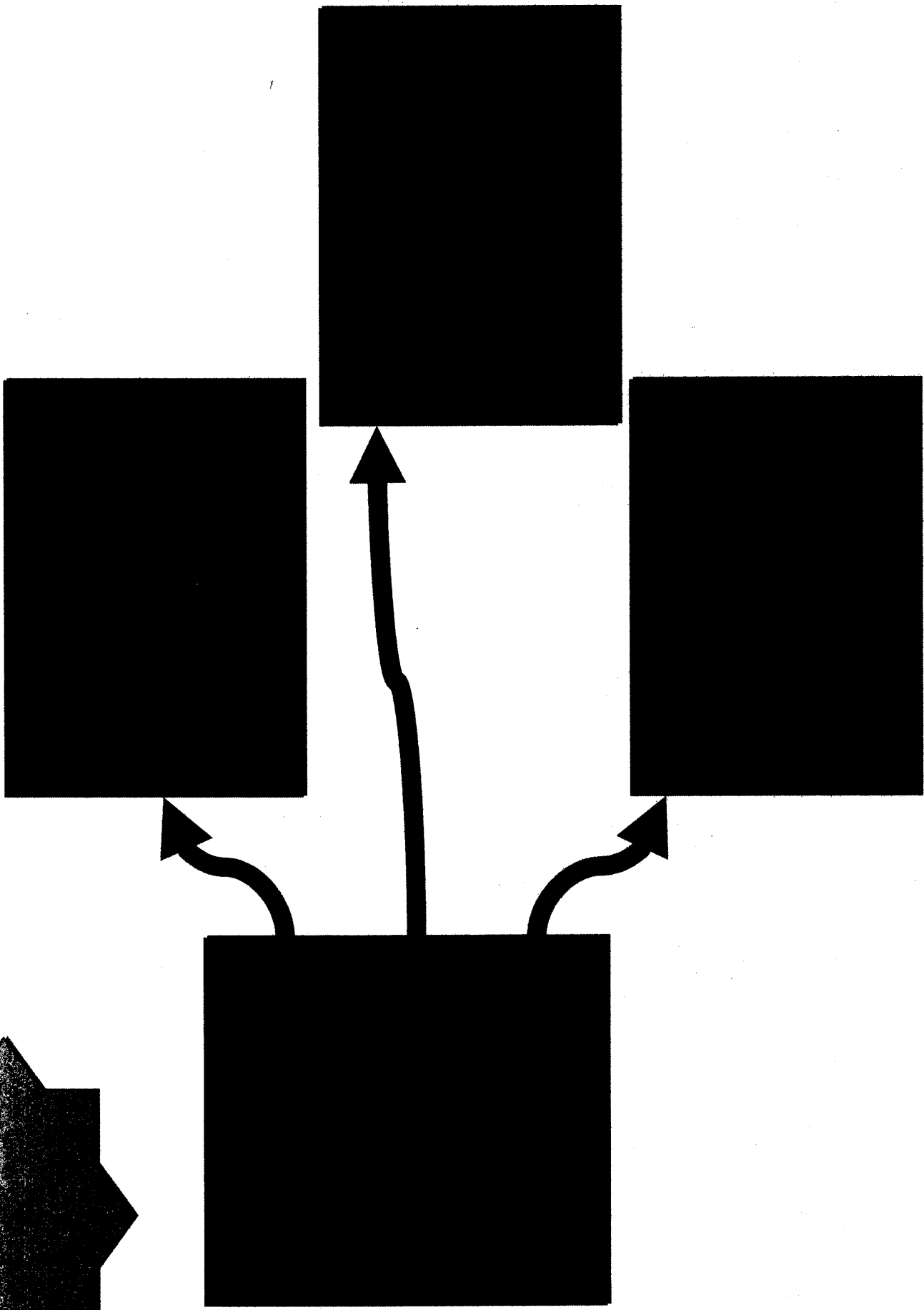
Again, I would like to thank you for your participation and input for the proposed rule changes.

Sincerely,

Adam L. Higginbotham
Director

PROPOSED INSTRUCTOR-TO-MASTER INSTRUCTOR REQUIREMENTS AND ELIGIBILITY

NOTE: All instructors and
masters will take an exam.



**Herbert E. Inscoe
4687 Balls Branch Road
Culloden, WV 25510
304-972-6225**

**To: WV Board of Barbers and Cosmetologists
1201 Dunbar Avenue
Dunbar, WV 25064**

Re: Proposal of changes to Master Instructor license.

I, want to object to the changes to the fact that I believe that the Master program should be totally and clearly ended. At the time that the program was established; it was probably a good idea. However, this and time has changed. We no longer really have the interest or motivation for advancement. With low pay scales that the schools offer, we have very few that would even be interested in advancing to become a Master Educator. I submitted a letter prior, and received a response that the board agreed to what I said, further I was just told in the early July that the college credits had been removed. Figure the cost of the college credits versa the pay offered here in the state of WV, its not logical.

I am asking again, for the state to do away with the Master Program. As, our former Director stated to me once you become an instructor, you are an instructor, the Master exam was the same. I have even ask of this office, what does one study to prepare for the exam, no one could tell me. I did buy the Milady's Master Educator books to relview. I have completed my hours under several Masters, which have been signed off and mailed to the board. And a copy was given to me. It would be in the best interest of this industry to terminate the Master Educator Program all together. I do support the board, in the progress that is taking place however; Please take this serious and end the program. With the continuing

education, it is adding unnecessary cost to us.

Thank you for your time. I appreciate it.

Herbert Inscoe

Herbert Inscoe

Cosmetologist and Barber Instructor

July, 20, 2010



Joe Manchin III
Governor

Adam L. Higginbotham
Director

State of West Virginia
Board of Barbers and Cosmetologists

1201 Dunbar Ave.
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Herbert Inscoc
4687 Balls Branch Road
Culloden, WV 25510

July 28th, 2010

Dear Mr. Inscoc,

On behalf of the Board I would like to thank you for your response to the proposed rule changes posted on our website for the upcoming 2011 legislative session.

As for the request to eliminate the two-tiered system of instructors in West Virginia (instructor and master instructor), there are many that agree with your opinion. At this time the Board has three rules open for proposed changes. The rules covering master instructors include four different rules. Therefore, if the Board would choose to propose the elimination of the master instructor program in the current three rules that mention the master instructors, one rule would still mention the master instructor program causing our rules to be inconsistent. Since the four different rules would not be in unison we could not proceed with a proposed elimination of the two-tiered system for the 2011 legislative session.

I encourage you to again petition the Board and gather individuals that share your vision of a one-tiered instructor status. The best way of voicing your support for the elimination of the master instructor title is to request to be placed on a board meeting agenda in February, March, April or May 2011.

Again, I would like to thank you for your participation and input for the proposed rule changes.

Sincerely,

Adam L. Higginbotham
Director