

**WEST VIRGINIA
SECRETARY OF STATE**

KEN HECHLER

ADMINISTRATIVE LAW DIVISION

Form #3

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1998 JUN 10 AM 8 27

SECRETARY OF STATE

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

AGENCY: Board of Barbers and Beauticians TITLE NUMBER: 3

CITE AUTHORITY W. Va. Code §30-27-1

AMENDMENT TO AN EXISTING RULE: YES NO

IF YES, SERIES NUMBER OF RULE BEING AMENDED: 6

TITLE OF RULE BEING AMENDED: Minimum Curriculum for Schools of
Barbering

IF NO, SERIES NUMBER OF NEW 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.

Edwin Roush

Edwin Roush, Executive Director

REVISED
FISCAL NOTE FOR PROPOSED RULES

Rule Title: Minimum Curriculum for Schools of Barbering (3 CSR.6)

Type of Rule: Legislative Interpretive Procedural

Agency W.Va. Board of Barbers and Beauticians Address 4860 Brenda Lane, Guthrie Center
Charleston, WV 25312

1. Effect of Proposed Rule	ANNUAL		FISCAL YEAR		
	Increase	Decrease	Current	Next	Thereafter
Estimated Total Cost	\$	\$	\$ 0	\$ 0	\$ 0
Personal Services					
Current Expense					
Repairs and Alterations					
Equipment					
Other					

2. Explanation of above estimates.

Although there will be some increase in the Board's workload, existing funding is adequate.

3. Objectives of these rules:

The proposed amendments will permit schools of barbering to provide instruction in permanent waving.

4. Explanation of Overall Economic Impact of Proposed Rule.

A. Economic Impact on State Government.

NONE

B. Economic Impact on Political Subdivisions; Specific Industries;
Specific groups of citizens.


Permitting schools of barbering to offer permanent waving will economically benefit the schools by allowing them to compete for students on an equal basis with surrounding states and by providing increased employment opportunities for students. This benefit should offset the increased costs for an additional senior level instructor, probably in place of a student instructor, which might range as much as \$50-\$100 more per week.

C. Economic Impact on Citizens/Public at Large.

Permitting barbering schools to teach and barbers to give permanent waves will provide the consuming public with greater convenience, accessibility and healthy competition.

Date May 16, 1988

Signature of Agency Head or Authorized Representative



Edwin B. Roush
Executive Director

WEST VIRGINIA BOARD OF BARBERS AND BEAUTICIANS

RULE ABSTRACT

Title: Minimum Curriculum for Schools of Barbering

CSR Title & Series: 3 CSR 6

Type: Legislative

Summary: The proposed amendments establish a 2000-hour combination barber/permanent waving curriculum for use by schools of barbering; increase the minimum number of senior instructors from two to three; and make other minor "clean-up" changes. These amendments will permit schools of barbering to teach permanent waving.

For further information contact: Regulatory Development Section, Health Department, 1800 Washington Street, East, Charleston, WV 25305, Telephone 348-3223, or WV Board of Barbers and Beauticians, 4860 Brenda Lane, Guthrie Center, Charleston, WV 25312, Telephone 348-2924.

Proposed Rules
Public Comments Received,
Discussion and Response

Title: "Minimum Curriculum for Schools of Barbering," West Virginia Board of Barbers and Beauticians Legislative Rules, 3 CSR 6.

A public hearing regarding this rule was held on October 26, 1987, and was attended by twelve people. Copies of comments are attached.

For "proposed": 1) Strike-throughs indicate a deletion proposed for public hearing. 2) Underlining indicates new text proposed for public hearing. 3) Strike-throughs of underlined text indicates deletion of a proposed addition. 4) Double underlining indicates text added after the hearing. 5) Restoration of text proposed to be deleted is shown by double underlining plus strike-throughs. Deletion of existing text after the hearing is shown by strike-throughs enclosed in brackets.

(1) Comment (Betty Dixon): These changes will increase the workload of the Board. (Fiscal Note).

Response: The fiscal note has been revised to state more precisely that although there will be some increase in the Board's workload, the Board can support the increase out of existing funding.

(2) Comment (Betty Dixon): If the Board cannot issue rules and regulations [sanitation, etc.] for the proposed permanent waving curriculum, then the Board should not propose a curriculum.

Response: The Board agrees that the standards governing permanent waving should be the same for barbers as for beauticians. Therefore, 3 CSR 3, "Operation of Barbershops and Schools of Barbering," is being expanded to include the requirements applicable to permanent waving from 3 CSR 4, "Operation of Beauty Shops and Schools of Beauty Culture." No change related to this comment is proposed for this rule (3 CSR 6).

(3) Comment (Betty Dixon): There is no equal opportunity by taking away from the beauticians curriculum and adding to the barber curriculum. Equal should be to take away from the barber curriculum and give to the beauty culture curriculum.

Response: The Board sees no health or safety reason for preventing properly trained barbers from giving permanent waves.

(4) Comment (Betty Dixon): With the crossover curriculum in effect now, the employment opportunities are better and 700 hours shorter for the students in West Virginia barber schools as compared to surrounding states.

Response: The Board believes that the proposed curriculum

is sufficient.

(5) Comment: Several persons commented negatively regarding the increase of the minimum number of instructors (see also "Proposed Rules: Public Comments ... for 3 CSR 5).

Response: Although the Board believes that small schools are no longer economically viable, it does not wish to burden existing schools unnecessarily. Therefore, the Board proposes to make the requirement for three instructors applicable only to new schools.

Proposed:

9.1. ~~In every school of barbering, there must be employed two regularly registered instructors for the first twenty students, or fraction thereof enrolled, three instructors, if the number of students be more than twenty and less than thirty-five. The instructor-student ratio, in excess of thirty-five students, shall be based on one instructor for each fifteen students, or fraction thereof, enrolled in school.~~ No school will be permitted to open or operate with less than three regularly registered, senior instructors: Provided, that schools having a valid license as of the effective date of this rule shall employ a minimum of two (2) such instructors. There must be one instructor for every twenty students, or reasonable average thereof, and an instructor shall be in the study and classrooms of the school at all hours, and supervise all practice student work. Every instructor in barber school shall devote his entire time, during school hours to instructing instruction and supervision of all practice student work, and shall not apply his time to the private, or public, practice of barbering for any reason.

[PROPOSED]

TITLE 3

LEGISLATIVE RULES
BOARD OF BARBERS AND BEAUTICIANS

MINIMUM CURRICULUM FOR SCHOOLS OF BARBERING

SERIES 6

198_

For Filing with the Legislative
Rule-Making Review Committee

[PROPOSED]
LEGISLATIVE RULES
BOARD OF BARBERS AND BEAUTICIANS

MINIMUM CURRICULUM FOR SCHOOLS OF BARBERING

3 CSR 6

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[PROPOSED]
TITLE 3
LEGISLATIVE RULES
BOARD OF BARBERS AND BEAUTICIANS

SERIES 6
MINIMUM CURRICULUM FOR SCHOOLS OF BARBERING

FILED
1983 JUN 10 AM 8:27
OFFICE OF WEST VIRGINIA
SECRETARY OF STATE

§3-6-1. General.

1.1. ~~These legislative rules establish~~ This legislative rule establishes the minimum curriculum, equipment and operation for schools of barbering.

1.2. Authority - W.Va. Code §30-27-1. Related - W.Va. Code §30-27-1 et seq.

1.3. Filing Date -

1.4. Effective Date -

~~1.5. Refiling Date - December 30, 1982~~

1.5. Supersession and Repeal of Former Rules - This rule supersedes and repeals "Minimum Curriculum for Schools of Barbering," Board of Barbers and Beauticians Legislative Rules, 3 CSR 2, filed June 1, 1972 and refiled December 30, 1982.

§3-6-2. Application and Enforcement

2.1. Application - ~~These legislative rules apply~~ This rule applies to the owners and operators of schools of barbering or beauty culture.

2.2. Enforcement - ~~Enforcement of these legislative rules~~ this rule is vested in the West Virginia Board of Barbers and Beauticians.

§3-6-3. Schedule of Subjects and Hours

3.1. Minimum Curriculum for Barber License.

3.1.1. Every West Virginia school of barbering shall conduct a course of study consisting of at least one thousand eight hundred (1800) clock hours, divided as follows and subdivided at the discretion of the faculty of each school. An accurate record of the number of hours devoted to the following prescribed subjects and the for each student by permit number must be posted on a bulletin board and available to all students on the first school day of each month and left for the number days in said month. The final examination grade on each student shall be presented to each student upon graduation, and shall also be made a part of each student's application for examination before the state West Virginia Board of Barbers and Beauticians.

~~3.1. Scientific study - See Table 3-6A found at the end of this regulation.~~

~~3.2. Demonstration--and--lecture--on--scientific--study--(No lecture--on--Saturday--(See--Table--3-6A--found--at--the--end--of--this regulation--))~~

3.1.2. A copy of this curriculum and rule must be posted on a bulletin board.

3.1.3. The curriculum and rules shown in Table 3-6A found at the end of this rule adopted by the West Virginia Board of Barbers and Beauticians are placed in effect.

3.2. Minimum Curriculum for Barber/Permanent Waving License - Every West Virginia school of barbering shall conduct a course of study consisting of at least two thousand (2000) hours for a barber/permanent waving license, divided as shown in Table 3-6B found at the end of this rule and subdivided at the discretion of each school.

~~3.3.--Supervised--practice--(See--Table--3-6A--found--at--the--end--of--this--regulation--)~~

~~3.4.--Illustrated--lecture--and--demonstrations--on--practical work--(No--demonstration--or--lecture--on--Saturday--)--See--Table--3-6A found--at--the--end--of--this--regulation--)~~

~~3.5.--A--minimum--of--five--(5)--hair--styles--required--by--each student--before--graduation--(See--Table--3-6A--found--at--the--end--of this--regulation--)~~

§3-6-4. Qualifications - A school owner, or any person who intends to own a school of barbering must be registered within this State as an instructor and will be required to submit to the State Board of Barbers and Beauticians satisfactory evidence as to the character of the person interested in managing and teaching in the school, literature and advertising material pertaining to the school, a copy of the contract to be signed by the prospective students and establish any necessary facts regarding the ownership of the school.

§3-6-5. Classrooms, Equipment, and General Instructions

5.1. Each school of barbering shall have at least two (2) clinic rooms in use at all times, one (1) to be known as the junior, or beginners, department and the other as the senior department. All beginners will receive instructions in the junior department and will advance to the senior department when they have proved themselves worthy. Both rooms shall be fully equipped and arranged in a manner to comply in every way and at all times with all the rules and regulations promulgated by the State Board of Barbers and Beauticians. There shall be a third room in every school of barbering where class study, examinations and lectures will be held. The minimum equipment with which a school will be permitted to operate is as follows:

(a) One (1) chair, lavatory, and backstand complete, providing proper cabinet for immediate linen supply and individual wet and dry sterilizers for each chair unit. There must be a total of not less than ten (10) such sets in each school;

(b) One (1) recognized textbook on barbering for each student;

(c) Three (3) high frequency or violet ray outfits;

(d) One (1) standard vibrator to each four (4) students enrolled;

(e) One (1) therapeutic lamp - infra-red, white and blue for every four (4) students enrolled;

(f) One (1) three-objective compound microscope with low, high and oil immersion objective (Bausch and Lomb, or Spencer and Zeiss, brand suggested); such microscope slides on related sciences dealing with bacteria and human anatomy as may become available, and as prescribed from time to time;

(g) One (1) S.V.E. slide projector, model AK300 watt for 2x2 slides;

(h) One (1) radiant hy-fleck glass beaded screen, model D.L., size 60"x60"; such 2x2 Kodachrome and lantern slides on bacteriology, diseases of the skin and scalp, and anatomy, as may become available and as prescribed from time to time;

(i) Sufficient clean linen cabinet space;

(j) One (1) blackboard, not less than 5'x 8' in size;

(k) One (1) large bulletin board, conspicuously located, for posting of Rules and Regulations, notices, etc.;

(l) One (1) set of record files;

(m) One (1) file for duplicate copies of reports sent to the office of the State Board of Barbers and Beauticians;

(n) One (1) set of books used solely for history and activity of students.

5.2. The study and lecture room shall be equipped with the specified blackboard and charts showing illustrations of the skin, circulation of the blood, muscles and bones of the face, scalp, neck, arms and hands. This room shall be used for the sole purpose of giving scientific instructions to students.

5.3. Each school of barbering shall maintain a library of suitable reference books including all of the required books later mentioned in this curriculum.

5.4. The use of question-and-answer books in schools of barbering is strictly forbidden.

5.5. Each school of barbering shall hold regular classes for the teaching of both the theory and practice of all phases of barbering.

5.6. No one in any way connected with any school of barbering shall guarantee positions to students nor guarantee financial aid in equipping a barber shop.

5.7. Schools are urged not to advocate the use of any particular equipment. Students should be familiar with the different supplies and equipment used in barber shops.

5.8. Each school shall advertise only under the designation of a barber school, and shall display conspicuously at the entrance to said school a sign in plain, block, display lettering at least one (1) inch in height, as follows: "All Work In This School Done By Students Only."

5.9. When service prices are displayed, or in any manner advertised by a school of barbering, they must be followed by the words "STUDENT WORK" in lettering at least one-half (1/2) the size of the lettering used to display the price.

5.10. Instructors, as well as students, must during school hours be attired in washable coats, which must be kept clean and neat at all times.

5.11. All bottles and containers in use must be distinctly and correctly labeled, showing the intended use of the contents.

5.12. No student enrolled in a school of barbering shall be permitted to work upon a patron who is paying for the service, or materials, until such student has been in attendance for a period of three hundred and fifty (350) hours.

5.13. Each senior student, before graduation, must act in the capacity of manager of the school for at least one (1) week; two (2) weeks if possible. He shall be in full charge of the clinical division of the school, under the supervision of the manager of the school, during that time.

5.14. The State Board of Barbers and Beauticians shall be furnished with a copy of the class schedule being used in each school of barbering, and copies of all advertising material and student contracts. At any time any changes may be made in any of the above, the Board shall be furnished with a copy of same, as revised.

5.15. In teaching the practical part of the training in schools of barbering, all schools will be governed by the "Schedule of Hours, Lecture, Demonstration, and Clinic Operations," as

set forth on the chart in Section 12 in this curriculum which is designated as practical schedule 1-a.

§3-6-6. Enrollment - The enrollment in a school of barbering shall not, at any time, exceed fifteen (15) students for each ten (10) barber chairs in school. This shall be construed to mean not to exceed one and one-half (1-1/2) students per chair.

§3-6-7. Attendance

7.1. All schools of barbering must establish regular school hours.

7.2. All schools shall require that all students attend classes at least eighty percent (80%) of the time enrolled in school, not to exceed eight (8) hours in any twenty-four (24) hour period, exclusive of lunch period.

7.3. A minimum of five (5) recitations per week, of three (3) hours each, shall be given all students. These periods shall include lectures, class study and written examinations. All examinations and other written papers shall be carefully graded and returned to the students in order that they may see their errors.

Note: Hours herein referred to shall mean full clock hours.

§3-6-8. Records

8.1. **Daily Records** - Each school shall keep a daily class record of each student, showing hours devoted to the respective subjects, number of clinical operations performed, the total number of hours in attendance, and days absent and present.

8.2. **Monthly Records** - A monthly record of the entire enrollment must be sent to the office of the State Board of Barbers and Beauticians on forms furnished to the schools for that purpose, showing the permit number of each student; the number of months each student has been reported for; a record of the days absent and present; hours devoted to each subject and number of clinical operations performed to date.

8.3. **Permanent Records** - A permanent record shall be compiled by the manager of each school from the daily class records. This record shall be kept up-to-date in a permanent file, and shall be subject to inspection at any time by any member of the State Board of Barbers and Beauticians, or any authorized representative.

8.4. **Final** - The manager of each school shall compile from his records a summary of each student's subjects, operations, grades, hours and attendance which shall be presented to the student upon graduation, and which shall also be made a part of his application for registration by examination. The manager

must sign each copy of the required records and must certify that the record is correct and that the student has received a diploma from his school.

§3-6-9. Teaching Staff

9.1. ~~In every school of barbering, there must be employed two regularly registered instructors for the first twenty students, or fraction thereof enrolled, three instructors, if the number of students be more than twenty and less than thirty-five. The instructor student ratio, in excess of thirty-five students, shall be based on one instructor for each fifteen students, or fraction thereof, enrolled in school. No school will be permitted to open or operate with less than three regularly registered senior instructors: Provided, that schools having a valid license as of the effective date of this rule shall employ a minimum of two (2) such instructors. There must be one instructor for every twenty students, or reasonable average thereof, and an instructor shall be in the study and classrooms of the school at all hours and supervise all practice student work. Every instructor in barber school shall devote his entire time, during school hours, to instructing instruction and supervision of all practice student work, and shall not apply his time to the private or public practice of barbering for any reason.~~

9.2. There must be at least one (1) monthly illustrated or demonstrated lecture during the course of instruction, given by a duly licensed physician, or some person who has had special training in anatomy, hygiene, bacteriology, physiology, electricity and/or other science related to the study of barbering.

9.3. All students must be given a complete course in barbering as prescribed in this curriculum.

§3-6-10. Postgraduate

10.1. No registered barber who enters school for the purpose of taking a postgraduate course will be permitted to remain in school longer than one thousand eight hundred (1800) hours.

10.2. Postgraduate courses may be arranged at the discretion of the faculty of the school and may be open to students who have previously attended school, or who have been graduated from another school of barbering, and credit from previous training may apply to the one thousand eight hundred (1800) hours required for graduation. Upon entrance, students must present to the school manager credentials showing subjects studied and hours credit received, duly signed and certified by the manager of the school previously attended.

10.3. Private lessons may be given to registered barbers who are desirous of gaining more knowledge in any subject, or subjects, which they are already entitled to practice.

§3-6-11. Credits That May Be Accepted From Schools of Barbering Not Located in West Virginia - A student who has been graduated from a recognized school of barbering not located in West Virginia, can be given credit only for the amount of hours required for graduation under the regulations in that particular state. These hours may apply on the one thousand eight hundred (1800) hours required for graduation from a school in this State. All credits accepted under this regulation rule must be duly certified to by the manager of the school the student attended and made a part of his application for examination as a barber in this State.

§3-6-12. Schedule of Hours - See Table 3-6B 3-6C found at the end of this regulation rule.

§3-6-13. List of Prescribed 2x2 Kodachrome Transparencies (Lantern Slides)

Following is a partial list of Kodachrome slides, 2x2, 35 mm., prescribed for use in schools of barbering in West Virginia. (See Table-3-6C 3-6D found at the end of this regulation.)

These slides may be purchased from Clay-Adams Company, Inc., 44 East 23rd Street, New York City 10, N.Y.

It is recommended that all schools write the Clay-Adams Company for the general catalogue on visual aids and complete listing of all medichrome slides.

§3-6-14. Library

All schools of barbering operating in West Virginia will be required to maintain a library for the benefit of students enrolled, consisting of all of the following books:

- (a) Gray's Anatomy
- (b) The Principles and Practice of Beauty Culture, by Florence E. Wall
- (c) Electricity and Light, by Noble M. Eberhart
- (d) Physics and Physiology of Infra-Red Radiation, by Herman Goodman, M.D.
- (e) Fundamentals of Selling, by Walters & Wingate (Fourth Edition)

The above named books may be purchased through the MiLady Publishing Corporation, 3839 White Plains Avenue, New York 67, New York

- (f) Economics in Everyday Life, by Goodman - Moore

The above named book may be purchased through Ginn & Company, New York

(g) A Textbook of Microbiology, by Kenneth L. Burdon, Ph.D., Second Edition - The MacMillan Company, New York

(h) Diseases of the Hair, by McCarthy - C. V. Mosby Company, St. Louis, Missouri

(i) Diseases of the Hair and Scalp, by Hubbard-Lea and Febiger, Philadelphia, Pennsylvania

(j) Chemistry for Nurses (with laboratory manual), by Harry C. Biddle, M.A.F.A. Davis Company Publishers, Philadelphia, Pennsylvania

(k) The American Pocket Medical Dictionary, by Dorland, The W. V. Saunders Company, Philadelphia, Pennsylvania

(l) Webster's Collegiate Dictionary, Fifth Edition

(m) Standard Textbook on Barbering

(n) The Master Barber and Beautician Magazine - Associated Master Barbers and Beauticians of America - 537 South Dearborn Street, Suite 1106, Chicago 5, Illinois

(o) Textbook on Practical and Scientific Barbering

(p) The Journeyman Barber Hairdresser and Cosmetologist J.B.H.C.I.U. of A., Delaware at 12th Street, Indianapolis, Indiana

(q) The Art and Science of Barbering - Fourth Edition Press of the Wolfer Printing Company, Inc., 416 Wall Street, Los Angeles 13, California

Table 3-6A

SCIENTIFIC STUDY

1.	Shop management, business law, ethics, salesmanship	175 hrs.
2.	Bacteriology, sanitation, disease of skin	125 hrs.
3.	Cells, anatomy	20 hrs.
4.	Skin and appendages, biochemistry of hair	60 hrs.
5.	Implements, honing, stropping, use and care	10 hrs.
6.	Haircutting procedures, history of barbering	20 hrs.
7.	Electricity, light therapy	5 hrs.
8.	Theory of massage, tonics	5 hrs.
9.	Haircoloring, effects on hair	5 hrs.
10.	Barber law and regulations, salesmanship, merchandising	100 hrs.
11.	Theory of hair styling, methods	<u>75 hrs.</u>
		600 hrs.

3-2- DEMONSTRATION AND LECTURE ON SCIENTIFIC STUDY
(No Lecture on Saturday)

1.	Shop management, business law, ethics, salesmanship	25 hrs.
2.	Bacteriology, sanitation, disease	10 hrs.
3.	Cells, skin and appendages, biochemistry of hair	10 hrs.
4.	Implements honing, stropping, use and care	5 hrs.
5.	Haircutting procedures, history of barbering	10 hrs.
6.	Electricity, light therapy	5 hrs.
7.	Theory of massage, tonics	5 hrs.
8.	Haircoloring, affects effects on hair	10 hrs.
9.	Use of audio visual aids for selling merchandise	10 hrs.
10.	Shop arrangement, display of merchandise	<u>10 hrs.</u>
		100 hrs.

3-3- SUPERVISED PRACTICE

1.	Scalp treatments, shampooing	75 hrs.
2.	Honing and stropping	15 hrs.
3.	Shaving	100 hrs.
4.	Facials, massage, packs	50 hrs.
5.	Haircutting	450 hrs.
6.	Hair tonics	10 hrs.
7.	Haircoloring, bleaching	30 hrs.
8.	Hairstyling, methods	200 hrs.
9.	Use of implements	<u>20 hrs.</u>
		950 hrs.

TABLE 3-6A (Cont'd.)

3-4. ILLUSTRATED LECTURE AND DEMONSTRATIONS ON PRACTICAL WORK
 (No Demonstration or Lecture on Saturday)

1. Scalp treatments, shampooing	20 hrs.
2. Honing and stropping	5 hrs.
3. Shaving	10 hrs.
4. Facials, massage, packs	10 hrs.
5. Haircutting	10 hrs.
6. Hair tonics	5 hrs.
7. Haircoloring, bleaching	10 hrs.
8. Hairstyling, demonstrations	10 hrs.
9. Salesmanship	10 hrs.
10. Unassigned	<u>10 hrs.</u>
	100 hrs.

3-5. ~~A minimum of (5) hairstyles required by each student before graduation.~~

SUMMARY

(e) Scientific study	700 hrs.
(f) Supervised practice	1050 hrs.
(g) Unassigned	<u>50 hrs.</u>
(h) Total	1800 hrs.

A minimum of (5) twenty-five (25) hairstyles required by each student before graduation.

Table 3-6B*

SCIENTIFIC STUDY

1.	Shop Management, business law, ethics,	100 hrs.
2.	Bacteriology, sanitation, disease of skin	125 hrs.
3.	Cells, anatomy	20 hrs.
4.	Skin and appendages, biochemistry of hair	60 hrs.
5.	Implements, honing, stropping, use and care	10 hrs.
6.	Haircutting procedures, history of barbering	20 hrs.
7.	Electricity, light therapy	5 hrs.
8.	Theory of massage, tonics	5 hrs.
9.	Haircoloring, effects on hair	5 hrs.
10.	Barber law and regulations, salesmanship, merchandising	50 hrs.
11.	Theory of hair styling, methods	<u>75 hrs.</u>
		475 hrs.

DEMONSTRATION AND LECTURE ON SCIENTIFIC STUDY
(No Lecture on Saturday)

1.	Shop management, business law, ethics, salesmanship	25 hrs.
2.	Bacteriology, sanitation, disease	10 hrs.
3.	Cells, skin and appendages, biochemistry of hair	10 hrs.
4.	Implements, honing, stropping, use and care	5 hrs.
5.	Haircutting procedures, history of barbering	10 hrs.
6.	Electricity, light therapy	5 hrs.
7.	Theory of massage, tonics	5 hrs.
8.	Haircoloring, effects on hair	10 hrs.
9.	Use of audio visual aids for selling merchandise	10 hrs.
10.	Shop arrangement, display of merchandise	<u>10 hrs.</u>
		100 hrs.

SUPERVISED PRACTICE

1.	Scalp treatments, shampooing	75 hrs.
2.	Honing and stropping	15 hrs.
3.	Shaving	100 hrs.
4.	Facials, massage, packs	50 hrs.
5.	Haircutting	450 hrs.
6.	Hair tonics	10 hrs.
7.	Haircoloring, bleaching	30 hrs.
8.	Hairstyling, methods	200 hrs.
9.	Use of implements	<u>20 hrs.</u>
		950 hrs.

TABLE 3-6B (Cont'd.)

ILLUSTRATED LECTURE AND DEMONSTRATIONS ON PRACTICAL WORK
(No Demonstration or Lecture on Saturday)

1. Scalp treatments, shampooing	20 hrs.
2. Honing and stropping	5 hrs.
3. Shaving	10 hrs.
4. Facials, massage, packs	10 hrs.
5. Haircutting	10 hrs.
6. Hair tonics	5 hrs.
7. Haircoloring, bleaching	10 hrs.
8. Hairstyling, demonstrations	10 hrs.
9. Salesmanship	10 hrs.
10. Unassigned	<u>10 hrs.</u>
	100 hrs.

PERMANENT WAVING

	<u>LECTURE</u>	<u>DEMONSTRATION</u>	<u>MANIKIN PRACTICE</u>	<u>TOTAL CLINIC</u>	<u>HOURS</u>
1. Permanent Waving	15	30	40	200	285
2. Chemical Hair Relaxing and Hair Straightening	8	7	10	65	90
	<u>23</u>	<u>37</u>	<u>50</u>	<u>265</u>	<u>375</u>

SUMMARY

Scientific Study	575 hrs.
Supervised Practice	1050 hrs.
Permanent Waving	<u>375 hrs.</u>
	2000 hrs.

A minimum of twenty-five (25) hairstyles required by each student before graduation.

* Table 3-6B is entirely new. Underlining of new text is omitted.

Table 3-5B. Schedule of Hours

Lecture, Demonstration and Clinic Operations
for
Schools of Barbering in West Virginia
Minimum Total Hours Practical Training = 1050

Practical Schedule 1-a

1050 Hours Clinical Practice Lecture and Demonstration	Lec. & Dem.	Req. Clin. Ops.	54 Days			54 Days			54 Days			54 Days		
			9 Weeks			9 Weeks			9 Weeks			9 Weeks		
			First Quarter			Second Quarter			Third Quarter			Fourth Quarter		
PRACTICAL SUBJECTS	Hrs.	No. C.Op.	Hrs. L-D		Op.	Hrs. L-D		Op.	Hrs. L-D		Op.	Hrs. L-D		Op.
Scalp Treatments	10	50	3	13	15	3	13	15	2	12	10	2	12	10
Shampooing	10	50	3	7	15	3	7	15	2	6	10	2	5	10
Honing and Stropping	10	-	3	4	-	3	4	-	2	4	-	2	3	-
Shaving	10	375	4	81	75	4	81	75	1	81	110	1	82	115
Facials, Massage, Steam	10	75	3	25	20	3	20	20	2	20	22	2	10	13
Haircutting	10	540	3	100	120	3	100	125	2	100	130	2	125	165
Hair Tonics and Singeing	5	100	2	6	25	1	6	25	1	6	25	1	7	25
Dyeing and Bleaching	5	-	2	3	-	1	3	-	1	2	-	1	2	-
Instruments, Tonics, Soaps, etc.	10	-	3	-	-	3	-	-	2	-	-	2	-	-
Salesmanship	10	-	3	-	-	3	-	-	2	-	-	2	-	-
Unassigned	10	-	3	-	-	3	-	-	2	-	-	2	-	-
TOTAL UNITS	100	1190	32	239	270	30	234	275	19	231	307	19	246	338
TOTAL HOURS	-	-	271	-	-	264	-	-	250	-	-	265	-	-

NOTE: The mark "—" means no assignment
C., Clin. = Clinic
D, Dem. = Demonstration
Hrs. = Hour
L, Lec. = Lecture
Op. = Operations
Req. = Required

Table-3-6C

Table 3-6D. Kodachrome slide list

1.	MS2-4	Chancre of the finger
2.	MS2-9	Chancre of the lip
3.	MS2-9.1	Syphilis, primary-lip
4.	MS2-31	Chancre of the face
5.	MS2-33	Chancre of the mouth and face
6.	MS2-47	Secondary syphilis
7.	MS2-58	Syphilitic alopecia
8.	MS2-200.5	Acne vulgaris, face, male
9.	MS2-200.6	Acne vulgaris, face, male
10.	MS2-202	Alopecia areata
11.	MS2-202.1	Alopecia capitis totalis
12.	MS2-205A	Comedones
13.	MS2-208A	Dermatitis seborrheica (impetigo sicca, face)
14.	MS2-210F	Erysipelas - face
15.	MS2-210H	Favus capitis
16.	MS2-210.H.1	Favus capitis, close-up
17.	MC-84.0	Herpes zoster (scalp and face, 10th day of eruption)
18.	MS2-213	Herpes simplex - lip
19.	MS2-213.1	Herpes simplex - face
20.	MS2-216	Herpes zoster - close-up
21.	MS2-216.3	Herpes zoster close-up, head lesion
22.	MS2-219A	Impetigo contagiosa, face
23.	MS2-221	Leprosy, face
24.	MS2-225.2	Lupus erythematosus, face
25.	MS2-242A	Rosacea, face
26.	MS2-246	Sycosis vulgaris under chin
27.	MS2-250-2	Tinea capitis
28.	MS2-252	Vitiligo - hands
29.	MS3-19	Acute eczema
30.	MS3-19a	Acute eczema
31.	MS3-20	Chronic eczema
32.	MS3-21	Psoriasis - early
33.	MSc-23	Pustular psoriasis
34.	MS3-27	Pityriasis rubra pilaris
35.	MS3-44	Acne varioliformis
36.	MS3-67	Keratosis seborrheica
37.	MS3-92	Herpes simplex
38.	MS3-92a	Herpes simplex
39.	MS3-93	Verruca plana
40.	MS3-93a	Verruca plana
41.	MS4-1	Ringworm of the scalp, clinical picture
42.	MS4-2	Circinate lesion, clinical picture
43.	MS4-3	Microsporum in hair
44.	MS4-12	Nail lesion, clinical picture
45.	MS4-13	Trichophyton in hair, endothrix
46.	MS4-14	Trichophyton in hair, favus type
47.	MS4-15	Trichophyton in the skin
48.	MS4-26	Epidermophyton, clinical picture

3 CSR 6

- 49. MS4-43 Pityrosporum ovale in dandruff, scale
- 50. MS4-44 Pityrosporum ovale (In wort agar and oleic acid)
- 51. MS4-45 Pityrosporum ovale (Microscopic of culture)
- 52. MS2-212 Hatband dermatitis
- 53. MC-81.0 Erysipelas (venenata face, 6th day of rash)
- 54. MC-82.0 Erysipelas (dermatitis venenata face, 6th day of rash)
- 55. MC-82.1 Erysipelas (close - up of face)
- 56. MC-90.0 Impetigo, lesion of face
- 57. MC-91.0 Impetigo, lesion of face
- 58. MC-92.1 Impetigo, close-up of face, chest, and abdomen
- 59. MS3-96 Impetigo contagiosa
- 60. Mc-83-0 Dermatitis venenata (face, 3rd day of rash)

PUBLIC HEARING

Barbara F. Beauticians Rules

10-26-87

DO YOU WISH TO COMMENT (YES/NO)

GROUP REPRESENTED (IF ANY)

ADDRESS

NAME

NAME	ADDRESS	GROUP REPRESENTED (IF ANY)	DO YOU WISH TO COMMENT (YES/NO)
Raymond Mills	4128 th St. Hgh. W.V. 25701	Hgh. Sch. of Beauty Culture	NO
John Brantley	Pt. 1 Box 418 Charleston, WV	Board Member BFB	NO
Edna L...	Board of Barber's Association		NO
J. J. Angette	311 Elm St. C. Bay, W.V.	Bd. of Robert Bee	und.
Sally J. Dixon	4328 Highest St. Huntington	Society of Barber & Beauticians	und.
Greene W. Schaub	329 S. Queen St. - Martinsburg	International Beauty Expo	Yes -
Charles B. Lynch	329 S. Queen St. Martinsburg	International Beauty Expo	Yes -
Jared M. Squire	1502 Market St. Wheeling, WV	Wheeling Beauty College	Yes -
Dona Gathoke	West Pittg. Co. - North Dept		
Ronald Brantley	Dr. Bd. of Barber & Beauticians		
Bernadine Brantley	338 Washington Ave. Martintown, WV	Hgh. v. chse. Barber College	NO.



Phillips Colleges, Inc.

One Hancock Plaza
Suite 1408
Gulfport, Mississippi 39501
(601) 864-6096

VIA FEDERAL EXPRESS

October 21, 1987

Department of Health
Regulatory Development Section
1800 Washington Street, E.
Charleston, WV 25305

Gentlemen:

The enclosed are comments of opposition to certain proposed rule changes governing the beauty culture and barbering industry in the State of West Virginia.

I represent Phillips Colleges, Inc., owner of Wheeling Beauty College. During the past (7) seven years, I have worked diligently to resolve legislative and departmental rule conflicts. While these proposed rule changes may have some merit, their broad effect would cripple the beauty industry within the state as well as be deemed unconstitutional based on the "Restriction of Trade Doctrine."

I desire to speak at the upcoming public hearing to further voice my opposition to these proposed changes.

Sincerely,

PHILLIPS COLLEGES, INC.

D. David McGuire
Vice President for Cosmetology

DDM/tw
cc: Gerald D. Adams, President

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OCT 23 1987

**REGULATORY DEVELOPMENT
SECTION**



Phillips Colleges, Inc.

One Hancock Plaza
Suite 1408
Gulfport, Mississippi 39501
(601) 864-6096

October 21, 1987

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OCT 23 1987

**REGULATORY DEVELOPMENT
SECTION**

Department of Health
Regulatory Development Section
1800 Washington Street, E.
Charleston, WV 25305

RE: Proposed Rule Change
Chapter 30, Article 27, Section 1

Gentlemen:

I write in opposition to the proposed changes of this rule based on the following reasoning:

Section 4 Licensing Standards

4.1 General Policy

- (b) Imposing a five-year residency requirement for owners of schools of barbering and beauty culture greatly limits the number of prospective operators of such schools within the State of West Virginia. The worst scenario would be a situation of financial insolvency or death of a current school owner. This likely scenario would potentially cause a school to close, harming a number of students by depriving them of their education.
- (e) The proposed requirement of three rather than two registered regular senior instructors places a financial burden on schools desiring to operate with a fewer number of students by requiring the smaller school to pay instructors they actually do not need.

4.3 Financial Responsibility

The requirement of a (\$125,000.00) one hundred twenty-five thousand dollar performance bond is ludicrous. The existing bond requirement is one of the highest in the nation. (See attachment) This amendment seems directed as a restriction of trade within West Virginia.

Department of Health
October 21, 1987
Page Two (con't)

4.5 Instructors

Please refer to comments in subsection 4.1 regarding requirement of three senior instructors.

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OCT 23 1987

REGULATORY DEVELOPMENT
SECTION

Department of Health
October 21, 1987
Page Three (con't)

RE: Proposed Rule Change
Chapter 30, Article 27, Section 1
Series Number 2

I write in opposition to the proposed rule change governing the Qualifications, Training, Examination and Registration of Instructors in Barbering and Beauty Culture, more particularly the proposed 100 hour curriculum and examination required for a barber instructor to qualify to teach permanent waving.

Subsection 4.3

It seems ludicrous to require barber instructors to complete only 100 hours of instruction in the art of permanent waving and at the same time require students to complete 375 hours of instruction in the same area of expertise. I must ask, "who will teach who?" I believe that an instructor should be required to complete as a minimum, an equal number of training hours as that of the students he/she will teach.

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OCT 23 1987

REGULATORY DEVELOPMENT
SECTION

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OCT 23 1987

REGULATORY DEVELOPMENT SECTION

STATE	ORIGINAL	RENEWAL	RESPONSIBILITY
Alabama	\$300	400 ²	\$5,000 bond
Alaska	700	600	Personal proof of financial responsibility
Arizona	350	300	\$10,000 bond
Arkansas	500	100	\$5,000 bond
California	216	185	\$5,000 bond
Colorado	345	69	\$10,000 bond
Connecticut	Schools are no longer licensed		
Delaware	50	50	\$5,000 for 25 students
Dist. of Columbia	100	50	None
Florida	150	75 ²	\$10,000 & up based on sq. footage
Georgia	175	150 ²	None
Hawaii	500	Note ^d	\$5,000 bond
Idaho	500	150	\$5,000 bond
Illinois	100	200 ^b	None
Indiana	400	400 ^c	None
Iowa	500	200	\$15,000 bond
Kansas	100	25	None
Kentucky	1000	100	Personal proof of financial responsibility
Louisiana	305	155	\$5,000 bond or financial statement
Maine	Schools are no longer regulated or licensed by the board		
Maryland	100	100	Personal proof financial responsibility
Massachusetts	200	200	\$5,000 bond up to 25 students;
Michigan	100 ^d	300 ^d	\$10,000 bond over 25 students
Minnesota	150 fee + 750 lfe.	750	\$10,000 bond and personal proof financial responsibility
Mississippi	55	30	\$5,000 bond
Missouri	185	185	None
Montana	100	100	\$5,000 bond
Nebraska	1000	100	\$5,000 bond for ea. 20 students (1st year only)
Nevada	450	450	\$5,000 bond & 25 bonus fide students
New Hampshire	125	125	None
New Jersey	100	50	\$10,000 minimum
New Mexico	500 + 100 ^e	500	\$5,000 bond
New York	600	Note ^f	\$20,000 bond
North Carolina	50	50	Personal proof financial responsibility
North Dakota	500	200	\$10,000 bond
Ohio	200	200	\$10,000 bond
Oklahoma	400	100	\$2,000 bond for 15 students + 1 instructor; \$1,000 bond per additional instructor
Oregon	200	200	\$2,500 bond
Pennsylvania	30	50	\$100 per student
Puerto Rico	50	None	None
Rhode Island	75	75	\$2,000 bond
South Carolina	100	25	\$5,000 bond
South Dakota	150	150	Not indicated
Tennessee	500	75	\$5,000 bond
Texas	500	200	\$5,000 personal bond
Utah	100	60 ²	\$5,000 bond
Vermont	100	50	\$2,000 bond
Virginia	65	35	None
Virgin Islands	200	200	None
Washington	150	150	To be determined by Director of Dept. of Lic.
West Virginia	500	250	Personal proof financial responsibility
Wisconsin	50	50 ²	None
Wyoming	100	100	None

To: Board of Barber's Examiners
For: Beverly Chalman
Chairman of Barber College

Re: 100 hrs. Barber Examiners,
Training in B.W.,
Da. Oct. 26, 1987

The 100 hours training would
be comprehensive in nature
on training.

The 375 hours for
students many hours
will be spent sitting
on the clinic floor
waiting for customers.

I feel the 100 hour
training is adequate
when you consider
it is actual work
done and not wasted
time.

Advanced training and
permanent wave
training previously

acquired should be reviewed. Whether Parker College staff has had years of training that has never been considered.

DATE:
TO:
FROM:
SUBJECT:

I believe it would be a good idea in the future to do a random survey of students on the actual training they are receiving in the beauty schools and on actual training the crossover students have received.

MEMORANDUM
STATE OF WEST VIRGINIA
DEPT. OF HEALTH





International Beauty Enterprises, Inc.

329 South Queen Street
Martinsburg, WV 25401
October 22, 1987

RECEIVED

OCT 26 1987

REGULATORY DEVELOPMENT
SECTION

Department of Health
Regulatory Development Section
1800 Washington Street, E.
Charleston, WV 25305

Re: 3 CSR 5

To Whom It May Concern:

The following is our response to the proposed changes of Rules and regulations for Licensing Schools of Barbering or Beauty Culture.

The general policy (4.1) under Licensing Standards, Section 4 will require a five year residency prior to the issuance of a license for a school of barbering or beauty culture. It is most evident that little or no thought has gone into this proposed regulation. Our comments regarding this issue are as follows:

We deeply resent, if the need ever arises, being forced to sell our cosmetology school to an extremely limited market. The ability to operate a school of cosmetology arts and sciences is not something that one acquires from being a resident of West Virginia for the period of five (5) years. It is also something that cannot be acquired from reading a textbook or attending a seminar. As a school that is accredited by the National Accrediting Commission of Cosmetology Arts and Sciences I believe it is in the industry's best interest to sell the institution to someone with a similar background. In West Virginia that narrows the market to eight (8) other Nationally Accredited Cosmetology Schools. Is this any reason for ever considering owning or even expanding a cosmetology school in West Virginia?

If I am restricted to selling my school to a limited market and I do not receive the fair market value on my investment do I have any recourse?

If I offer my cosmetology school for sale and I have no interested parties that have the five year residency requirement do I just close the establishment and deprive the already enrolled students of their education?

In the minutes of the State Board of Barbers and Beauticians, Page 5, dated August 16, 1987 the following statement is made: "...franchised salons and schools are coming into this state and are creating much competition."

This type of antiquated thinking can be most detrimental to the growth of the cosmetology profession in West Virginia. Competition should be looked upon with much challenge and the desire to strengthen educational programs that are already in existence. It is through healthy competition that cosmetology students and licensed cosmetologists can grow further in their field. Complacency is not going to improve our industry in West Virginia.

The proposed five year residency requirement prior to issuance of a license for a barber or beauty school is a detriment to the growth of our industry and should not be a part of the proposed rules and regulations.

Secondly, the proposed requirement stating that the applicant has contracted for the employment of three or more registered regular senior instructors should also be deleted. In questioning the availability of senior instructors in the State of West Virginia we find there are approximately 37 active instructors. Simple mathematics will show that the availability of senior instructors to accommodate the needs of the accredited, non accredited and vocational schools in the state will utilize every available licensee in the state.

This proposed regulation would then require a school of cosmetology to deny enrollment if they are unable to find a third senior instructor.

This proposed regulation would also require an institution to send home students when a senior instructor calls in sick because they will no longer be meeting the requirements of the State Board of Barbers and Beauticians.

When a senior instructor takes a vacation and a replacement can't be found the school would be in violation unless they send their students home.

Unfortunately the piece of paper that states an individual is a licensed senior instructor does not mean that this individual is a qualified instructor. As a result of this

complacency in teaching will also become the norm. Why should a teacher even attempt to improve his or her ability when they have a piece of paper, a license that is a passport to a position, wether qualified or not, because a school owner needs three senior instructors to keep his doors open.

The present requirements to obtain senior instructor licensure in West Virginia is extensive and not realistic as it presently stands. To further require an institution to expand their staff would create extreme hardship on the institution and could possibly force the closing of some cosmetology schools in West Virginia.

We have already discussed the five year residency status with a Washington law firm that specializes in the field of cosmetology arts and sciences. Their immediate reaction was that a violation of law would take place if such a rule was enacted. We have since sent them the complete text of proposed changes. If the proposed changes are adopted we will most actively pursue any and all means to rescind these detrimental changes.

In closing it is indeed unfortunate that such a tremendous amount of time is being wasted caused by individuals that would rather limit, control and stifle the cosmetology school industry in West Virginia. Can you just imagine the growth of our total profession if this negative energy could be harnessed into developing and enhancing our educational programs so our students can truly reap the benefits of superior cosmetology education.

Yours truly,



George W. Schaub, President
International Beauty Schools

cc: Edwin Roush, WV Board of Barbers and Beauticians
Carol Cataldo, National Accrediting Commission of
Cosmetology Arts and Sciences
Dr. James Murphy, National Association of Accredited
Cosmetology Schools
Jerry Adams, Phillips Colleges, Inc.

AMENDED 1

Page 3. Section 4.2 - Classroom and Equipment - Minumum with which a barber and a beauty school will be permitted to operate for no more than 50 students instead of 20.

2. Change 20 dresserettes and 20 mirrors to 50 of each.
15. Change 20 hairdressing chairs to 50
17. Change 20 Classroom chairs to 50.

Jo Ann Berwick

ALL THE AMENDMENTS MUST PERTAIN TO THE OPENING OF A NEW BEAUTY OR BARBER SCHOOL OR THE PURCHASING OF AN EXISTING SCHOOL.

AMENDED # 5

1. Turn page to title : Rules and Regulations for Licensing Schools of Beauty Culture and Barbering.
 1. All the amendments must pertain to the opening of a new beauty or barber or the purchasing of an existing school.
 2. A five (5) year residency requirement for major stockholders, not just owner.
 3. Full time employment of three (3) registered regular instructors, not the proposed employment.
 4. Increase Bond to \$125,000.00.
2. Page 1: Section 2.1 Application
Rules must apply to major stockholders
3. Page 1 & 2 Section 4.1. General Policy: applicant must be changed to major stockholder.
Turn to page 2 - Contracted changed to hired full time Instructors/
4. Page 2 Section 4.5 - Show to proposed employment must be changed to hired full time.
5. Page 2 - Section 5.1: Name of applicant must be changed to Major stockholders.
6. Page 3 Section 5.3: Board Action- Employment of at least 2 registered Instructors changed to Three Instructors.

John Berwick

Representing Jack Donta - Huntington
School of Beauty Culture

10-26-87

412 8th St.
Hgn., W.V. 25701

It is my hope that there would be much more time put into research and study of these said proposals. I do not believe there has been adequate thought and honest research done to warrant a "rush" through of these proposals as they read now.

Concerning the proposal of 3 Senior Instructors -
- I feel it could work better if it were stated one senior instructor for 20 students currently enrolled in any said school.

Concerning the proposal of a 5 year required residence -- What happens if the current owner dies? Or, if he decides to sell what happens to "free enterprise"?

The proposed rule for Esthetician should read a proposed rule for "Skin Care".

Finally who will teach a Barber to qualify him/hu to instruct?? How? & Who?

Rebecca Mills

10-25-87

I ~~request~~ request that these Comments on proposed changes in the Rule & Regulations governing Beauticians, Barbers, ^{Instructors,} Salons, Shops and Schools be made a part of the record.

When we first started working on proposed changes, I kept suggesting that the Board needed time & ^{work} meetings to properly make needed changes. Also research as to other States. It is my personal feeling's the board has not had adequate time & research to do this.

~~The meeting~~

The public hearing today is on Proposed Rule Series # 1, 2, 3, 4, 5, 6. What I have read is not the changes the Board of Barbers and Beauticians worked on. There have been proposed rule deleted also changes made in proposed rule and there have been additions to proposed rule that the Board of Barbers and Beauticians did not approve.

(1)

10-25-87

Proposed Rule # 1 ^{Series}

Curriculum and minimum Requirements
Subject & Hour Schedule Rules & Regulations
for Schools of Beauty Culture in West Virginia
Joint Barber and Beauticians License

#1. The effect of proposed rule will increase the work load of the W.V. Board of Barber & Beauticians which is always short handed.

#2. The Aesthetician Curriculum has NO Rules or regulations. Inspector

#3. The last page same as above also it is the ^{31D} Cross over Curriculum for ^{Barber} Schools. 31C is the Cross over Curriculum for Beauty schools

~~If the Board cannot~~ If the Board cannot issue rules & regulations relating to Aestheticians then I feel we should not propose ~~for~~ a curriculum. We need to change ~~In propose~~ this curriculum to propose a curriculum for 300hr Skin Care

(2)

10-25-87

Proposed Rule Series # 2

Qualifications, Training, Examination and Registration of Instructors in Barbering & Beauty Culture

1. This proposed rule will increase the work load of the WV. Board of Barbers & Beauticians

2. 4.3.1. 100 hr curriculum for Barber Instructors to qualify to teach permanent waving.

~~For~~ This like Esthetician Curriculum the Board can not issue rules & regulations then they should not propose this rule.

Proposed Rule ^{Series} # 3

Operation of Barber Shops & Schools of Barbering

1 This proposed rule The WV Board of Barbers & Beauticians did not make or approve

Proposed Rule Series # 4 Operation of Beauty Shops and Schools of Beauty Culture

1 This proposed rule The WV Board of Barbers & Beauticians did not make or approve

(3)

10-25-87

Proposed Rule Series 5

Rules & Regulation for Licensing Schools of Barbering & Beauty Culture

- # 1 4.1. The changes are incorrect
- # 2 4.5. The changes are incorrect
- # 3 5.3. Incorrect
- # 4 6.2. The changes are incorrect
- # 5 Page 5 4th paragraph Changes are incorrect

Proposed Rule Series 6

Minimum Curriculum for schools of Barbering

1 These changes will ~~effect~~ ~~the~~ increase the work load of the WV Board of Barber & Beauticians which is always short handed

2 As in Reshtician of The Board cannot issue rules & regulations for the proposed permanent waving curriculum then The Board should not propose a curriculum

3 There is no Equal Opportunity by taking away from the Beauticians Curriculum & adding to the Barber Curriculum
(4)

10-25-87

Equal should be ~~to~~ take away from the Barber Curriculum & giving to the Beauty Culture Curriculum.

With the Cross over Curriculum in effect now the employment opportunities are better & ~~has~~ ^{is} shorter for the students in W.V. Barber Schools ~~in~~ ~~the~~ compared to surrounding States

In summary ^{WV} I feel the primary function of the Board of Barbers & Beauticians is to protect the Health Safety and Welfare of the Public

The proposed rule changes omits rules and regulation which are important to the Health Safety & Welfare of the Public. I am in favor of changes & updating of rules & regulation.

Betty J Dixon
4328 Hughes St
Huntington, W. Va. 25704
(5)