



Office of the Legislative Auditor

State of Minnesota

# ***Board of Cosmetology Licensing***

May 27, 2021

# Key findings

- Complex licensing structure creates unnecessary burdens for licensees
- Confusion about differences between cosmetology and barbering; regulatory inconsistencies

# Cosmetology



...personal services, for compensation, for the cosmetic care of the **hair**, **nails** and **skin**.

— *Minnesota Statutes 2020*,  
155A.23, subd. 3



# Regulatory Purpose

- To protect public health and safety
- License required



# The Board of Cosmetology regulates the practice of cosmetology

- Licenses, inspects, enforces
- Received \$2.9 million in FY 2020
- Collects licensing fees and enforcement penalties

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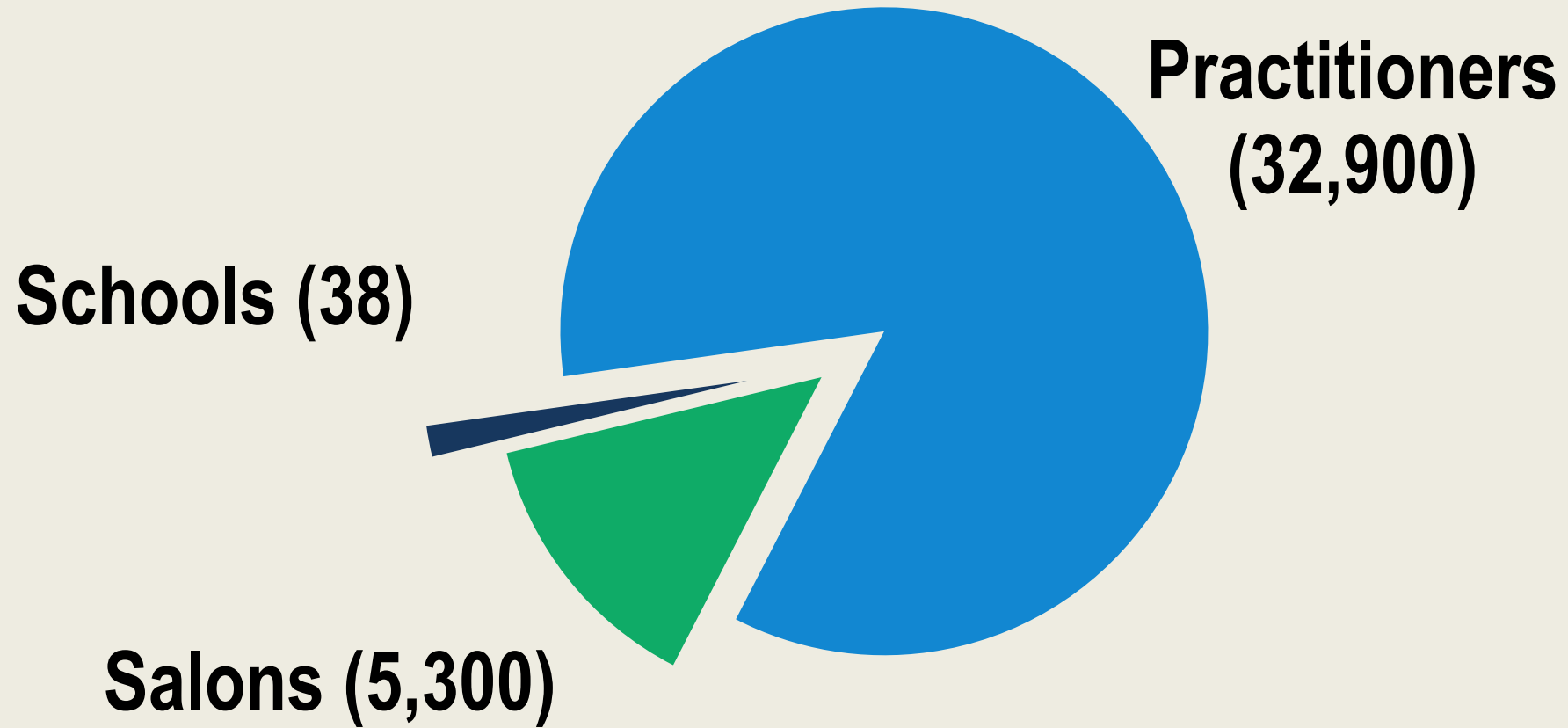
## 7-Member Board

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2	Cosmetologists
1	Esthetician
1	Nail technician
2	Instructors
1	Member of the public

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# 38,000 Licensees, FY 2020



# Licenses Issued, FY 2020

**Permits (200)**

**Salons (1,860)**



**Practitioners (11,800)**

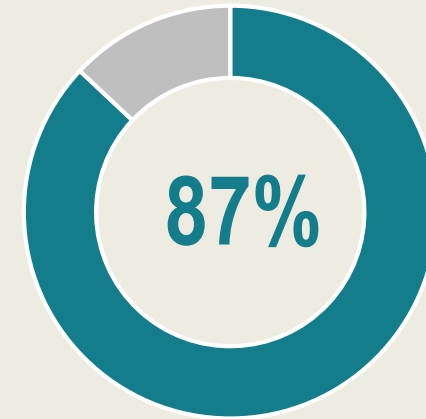
**Schools (13)**

# Applicant Experiences

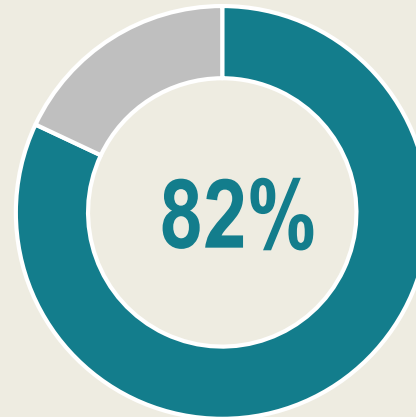


At times it has been a struggle to get a straightforward answer, as there always seems to be a grey area.

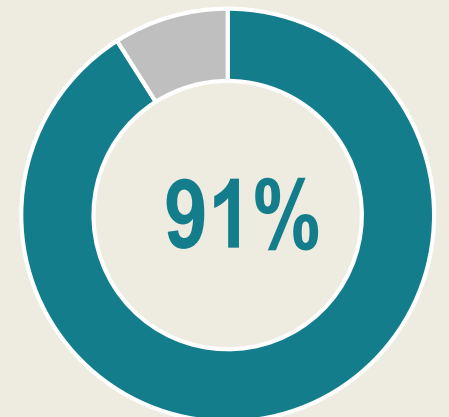
—Licensee



**Application Process Ease**  
(Practitioner Renewals)



**Website Satisfaction**



**E-mail Clarity**



# Licensing Structure for Practitioners

Level of Practice	Area of Practice				
	Cosmetology	Nails	Esthetics	Advanced Practice Esthetics	Eyelash Extensions
Operator	✓	✓	✓	✓	✓
Salon Manager	✓	✓	✓	✓	✓
Instructor	✓	✓	✓	✓	✓
School Manager	✓	-	-	-	-

# Licensing Structure for Practitioners

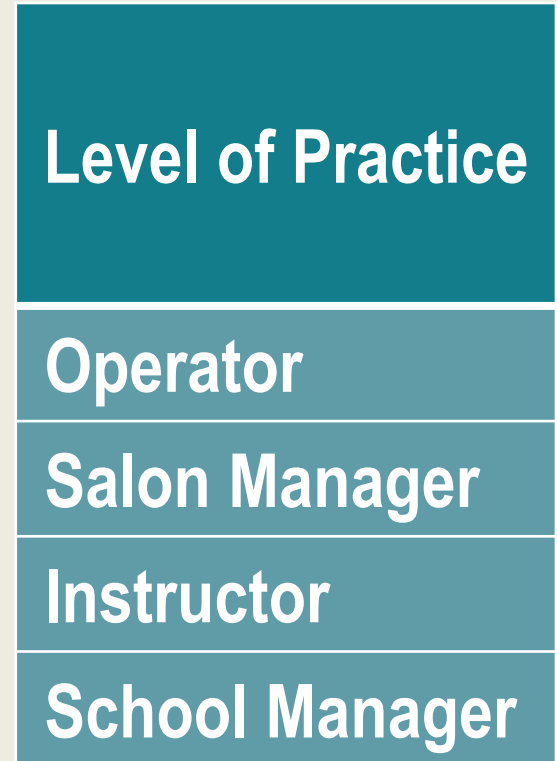


I hold **five licenses**, which cost approximately \$725 every three years to renew...along with an additional \$1,500+ in continuing education costs...

—Licensee

# Operator

- Complete training and pass practical skills test
- Pass written practical, general theory, and state cosmetology laws exams
- Pay \$195, three-year license fee



# Salon Manager

- Able to serve as the “designated licensed salon manager” (DLSM)
- 2,700-hour requirement repealed
- Tested on same legal provisions as operators



Level of Practice
Operator
Salon Manager
Instructor
School Manager

# Salon Manager Recommendations

- Repeal salon manager license
- Allow operators to serve as designated salon manager



## Level of Practice

Operator

Salon Manager

Instructor

School Manager

# Instructor and School Manager

Level of Practice	Supersedes	Must Also Hold
Operator	-	-
Salon Manager	Operator license	-
Instructor	-	Operator or salon manager license
School Manager	-	Salon manager license

# Instructor and School Manager

- Requirements exceed those of underlying licenses, but do not supersede underlying licenses
- Must hold multiple licenses



# Instructor and School Manager Recommendations

- Allow instructor and school manager licenses to supersede underlying licenses





# Specialty Licenses



I feel a separate ‘hair’ track should be considered for licensing people instead of making students pick cosmetology when they have no desire to do skin or nails.

— Licensee

Area of Practice	Hours of Training
Cosmetologist	1,550
Hair	No license
Esthetician	600
Nail Technician	350

# Specialty Licenses Recommendations

- Create a hair-only specialty license
- Consider creating other narrow-scope specialty licenses
- Consider endorsement-based licensing structure

## Example of Endorsement-Based License

☒ Hair

☒ Nails

☒ Nails Instructor

# Salon License

- Rule change made requirements the same
- Began issuing single type of salon license in 2018
- Statutes still require salon licenses to be differentiated by area of practice



# Salon License Recommendation

- Allow the board to issue salon licenses that are not differentiated by area of practice



# Practice Outside of Salons

	Homebound Services	Special Event Services
Scope of Practice	Any services	Hairstyling (no cuts or chemical treatments) Makeup Nail polish
Requirements	Must hold any license	Must hold salon manager license Must notify board where services will be performed
Fee	\$50 for 3 years	\$75 for 1 year

# Practice Outside of Salons

## Recommendations

- Reevaluate the scope and requirements for these permits
- Consider merging them

# Makeup and Hairstyling

- 2020 Legislation exempted makeup artists and hairstylists from licensing if they take a one-time, four-hour course
- No means to enforce





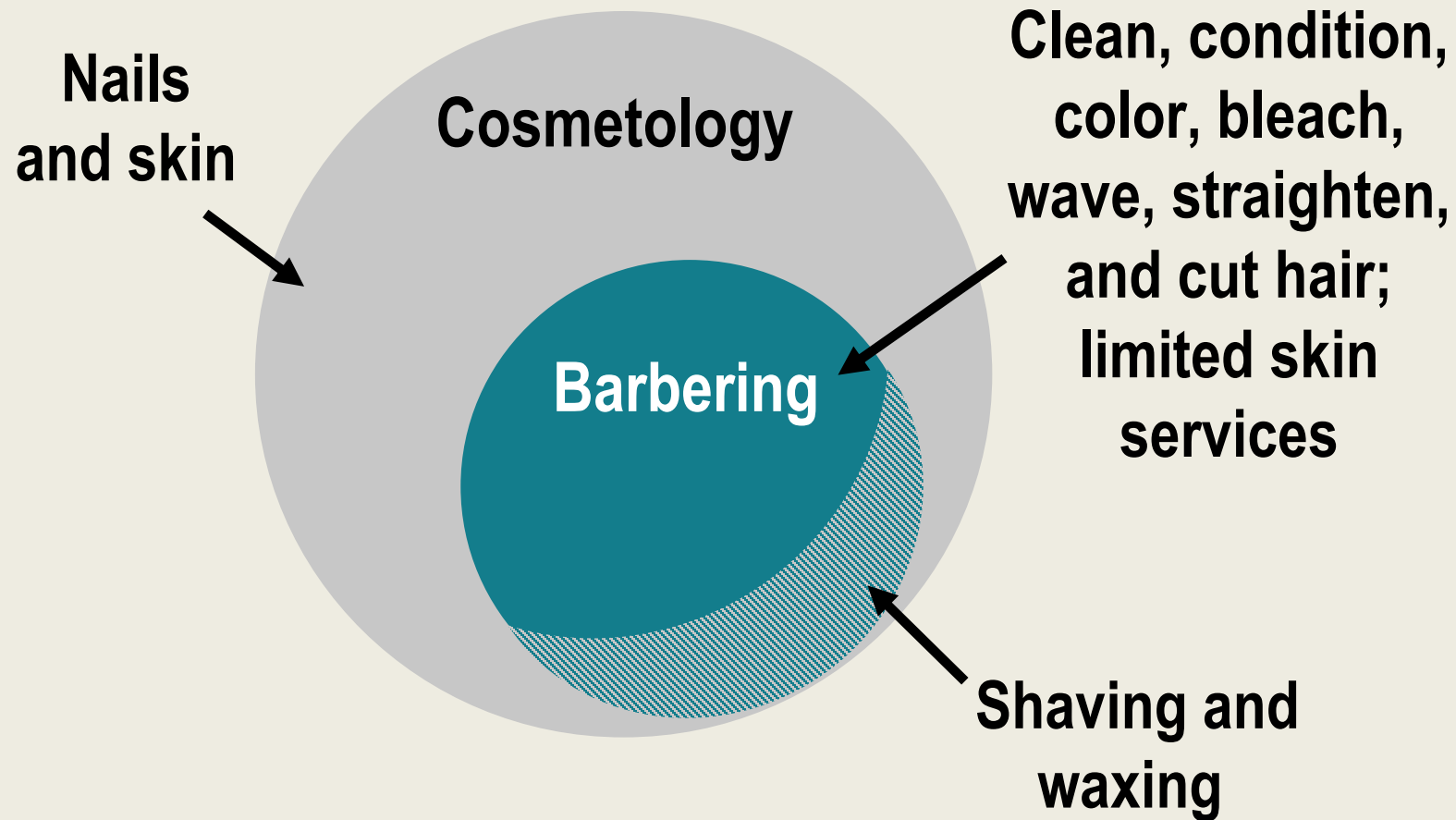
# Makeup and Hairstyling Recommendations

- Require unlicensed makeup artists and hairstylists to register
- Publish and audit registrations
- Require makeup artists and hairstylists to take the four-hour course at a regular interval





# Cosmetology and Barbering Scopes



# Cosmetology and Barbering

## No Reciprocity

Required Training	Cosmetology	Barbering
Total	1,550	1,500
Infection control	✓	✓
Safety procedures	✓	✓
Anatomy	✓	✓
Dermatology	✓	✓
Chemistry	✓	✓
Cutting hair	✓	✓
Chemical hair treatments	✓	✓

# Cosmetology and Barbering

## No Reciprocity

Existing Credential		New Credential
Esthetician	550 hours →	Cosmetologist
Nail technician	200 hours →	Esthetician
Esthetician	100 hours →	Nail Technician
Barber	0 hours →	Cosmetologist

# Cosmetology and Barbering Regulatory Inconsistencies

	Cosmetology	Barbering
Credential Required	License	Registration
Manager License	Required	<b>Not required</b>
Practice outside credentialed establishment	Allowed	<b>Not allowed</b>
Mobile establishment	Allowed	<b>Not allowed</b>
Continuing education	Required	<b>Not required</b>
Renewal	\$115, 3-year renewal	\$80, annual renewal

# Cosmetology and Barbering Boards

<b>FY 2019-2020</b>	<b>Cosmetology Board</b>	<b>Barber Board</b>
Employees	31	3
Appropriations	\$5.7 M	\$686,000
Licensees	38,300	2,900
Credentials issued	27,600	600
Inspections conducted	8,500	1,100
Complaints received	490	80

# Cosmetology and Barbering in Other States

- Allow only barbers to shave and trim beards
- Allow both barbers and cosmetologists to shave and trim beards
- Offer a crossover license or reciprocity across licenses

# Cosmetology and Barbering Recommendations

- Consider merging the two boards
- Clarify the scopes of practice of cosmetology and barbering
- Allow cosmetology practitioners to count some of their training toward a barber credential and vice versa

# ***Board of Cosmetology Licensing***

**[www.auditor.leg.state.mn.us](http://www.auditor.leg.state.mn.us)**