



**Informational Meeting Agenda**  
September 29, 2026  
Room 205 Ryan Office Building

- 9:00-9:15 a.m.      Call to Order and Member Introductions**
- 9:15-10:05 a.m.      PANEL ONE – Cosmetology services, salons and inspections**
- Kalonji Johnson, Deputy Secretary for Regulatory Programs  
*Pennsylvania Department of State*
- Rick Morrisette, Director, Bureau of Enforcement and Investigation  
*Pennsylvania Department of State*
- Eileen Teti, Salon Owner  
*Hair Way to Beauty*
- Aaron Shenck, Executive Director  
*Mid-Atlantic Association of Career Schools*
- Debbie Dunn, Owner  
*Lancaster School of Cosmetology*
- Gopal Patel, MD, FAAD  
*Aesthetic Dermatology Associates; PA Academy of Dermatology*
- 10:05-10:55 a.m.      PANEL TWO – Cosmetology training and education**
- Leslie Roste, Director of State Relations  
*Professional Beauty Association*
- Rachel Gonzalez, Activism Manager  
*Institute for Justice*
- Aaron Shenck, Executive Director  
*Mid-Atlantic Association of Career Schools*
- Debbie Dunn, Owner  
*Lancaster School of Cosmetology*
- 10:55-11:00 a.m.      Closing Remarks and adjournment**

Testimony of Deputy Secretary of Regulatory Affairs Kalonji Johnson and Director of the  
Bureau of Enforcement and Investigation Richard Morrisette

Pennsylvania Department of State

September 29, 2026

Chairman Burns, Chairman Emrick, and members of the House Professional Licensure Committee, thank you for the opportunity to appear before the committee to discuss the licensing and inspections of cosmetology salons and cosmetology services.

The Bureau of Enforcement and Investigation (BEI) plays an important role in protecting the health and safety of Pennsylvanian's by inspecting facilities licensed by the Bureau of Professional and Occupational Affairs (BPOA) and investigating complaints against licensed practitioners and businesses, as well as actors engaged in unlicensed practice. BEI inspectors conduct both inspections of facilities applying for initial licensure and routine inspections of already licensed facilities. BEI inspectors also perform directed inspections of facilities when complaints have been received. In 2025, BEI completed over 37,000 investigations and facility inspections amongst all the twenty-nine boards and commissions under BPOA.

When an individual is opening a new cosmetology salon in Pennsylvania, the salon owner must first submit an application to the State Board of Cosmetology for review. Board staff will review the application and the floor plan submitted with it to ensure that it meets the square footage requirement in the law and that the floor plan contains the items required in the Cosmetology Law and Board Regulations. The floor plan must include the position of the doors, windows, partitions, shampoo basins, adjustable chairs and other floor equipment. Once the application is reviewed and all the required items were submitted and complete, it is assigned to an inspector from BEI.

The inspector schedules a time with the applicant to come to the location for the inspection. The inspector ensures the salon meets the equipment, signage, and space requirements, and there is no evidence that prohibited items are in the licensed square footage of the salon and no prohibited services are to be provided. An inspection can be marked incomplete if there are administrative errors on the application. Incomplete inspections are the result of an error such as the name or address of the facility do not match what was submitted on the application. The applicant can correct those in their application in PALS. An inspection can be failed if the salon does not meet the requirements in the practice act or the board regulations.

BEI also conducts routine inspections of facilities. These are unannounced inspections that occur biennially. When conducting inspections, the inspector will check to ensure the facility and cosmetologists working are licensed, health and safety standards are met, and no prohibited activities are being in the licensed salon area.

The most frequent reasons for failing a routine inspection are employing unlicensed personnel and performing services in the salon that are outside the definition of cosmetology. A common question from licensees when a citation is issued for services outside the scope of cosmetology relates to timing, when the salon has been offering the service at issue for years. It is important to note that an inspection is a snapshot in time. At the previous inspections, if the service at issue was not being performed or no equipment used for that service was witnessed by the inspector, there would be no reason to fail the salon. It is also important to note that a BEI inspector will never issue a citation at an inspection. They will take their report back and a decision as to citation is made by legal staff from the Prosecution Division and Professional Compliance Office.

We are always open to working with the General Assembly on legislation that will eliminate unnecessary burdens for licensees while also protecting the health and safety of the public. Just a couple of years ago, the General Assembly and the Department worked together to eliminate the license requirement for natural hair braiders. One example of a change that we would be pleased to engage with the Committee on is removing the prohibition on booth rental in the Cosmetology Law. Booth rental is allowed under the Barber Law and the Department would support a legislative change to allow licensed salons to rent a chair to licensed cosmetologists in the same way. We remain committed to our relationship with the Committee and to ensuring Pennsylvania is a place where cosmetologists want to live and work.

Thank you for the invitation to appear before the committee to talk about the work of BEI. We are proud of the accomplishments and professionalism of the individuals working in our Bureau as they strive to protect the health and safety of Pennsylvanians.

**Written Remarks: Eileen Teti, owner/stylist, Hair Way to Beauty**  
House Professional Licensure Committee  
Informational Meeting – September 29, 2026

Good morning, Chairman Burns, Chairman Emrick and Members of the Committee:

My name is Eileen Teti and I am the owner of the salon Hair Way to Beauty in Northeast Philadelphia.

I present to you today in the hope that House Bill 644 will be passed into law. My biggest issue with being a salon owner is not being allowed to do booth rental in my small business. Barbers have been able to do this for quite some time, which I find very sexist. On top of that, we now have salon suites that have come into Pennsylvania, allowing glorified booth rental. It was a real slap in the face when I first heard about it. This is hurting my business as I have stylists come in asking to do booth rental, and I've had to turn them away. I know they have each stylist get their own shop license, but maybe they can have a small salon do that as well. Business is not good anyway, especially since COVID. This has been a big detriment to my bottom line. We need to even up the playing field with the bigger salons, and this would be a step in the right direction.

Another issue that could be looked at is education for future cosmetologists. One of my employees who was in school in 2022 had no teacher for a few months in the school that they went to yet still had to pay to attend. The students would literally sit in a room waiting for an available teacher to show them something. I have found that young stylists coming in need a lot more education when they start than I had when I began my career. We are never done learning, but when you are a student, you should be learning the basic concepts of hair. There could be a lack of teachers, so maybe there could be a program to encourage people to teach in a cosmetology school.

The last thing I want to bring up is perhaps the board could go back to doing the surveys asking hairstylists what things on the State board of Cosmetology test we would change or update. I don't remember getting one for quite some time, and I thought it was a great idea to help them see what is really going on in salons and what needs to be focused on in a school.

Thank you and I hope my remarks have been helpful in making the hair industry stronger!

Eileen Teti  
Owner/stylist  
Hair Way to Beauty



**September 29, 2026**  
**Public Hearing On The Cosmetology Act**

Honorable Frank Burns – Majority Chair  
House Professional Licensure Committee

Honorable Joe Emrick – Minority Chair  
House Professional Licensure Committee

Chairmen Burns, Emrick, and Members of the Professional Licensure Committee, thank you for the opportunity to comment today on various issues impacting Pennsylvania's Cosmetology Act.

My name is Aaron Shenck and I am the Executive Director of the Mid-Atlantic Association of Career Schools (MAACS). With me today is Debbie Dunn, President of the Lancaster School of Cosmetology.

MAACS represents over 100 technical colleges and other postsecondary career schools in Pennsylvania and several bordering states. Many of these institutions either specialize in cosmetology programs exclusively and/or have beauty-related programs as part of their larger catalog of programs.

## **REVIEW OF LEGISLATION**

First, we would like to thank the committee for its recent passage of [Senate Bill 331](#), which authorized Pennsylvania to be the 13<sup>th</sup> state to be part of the Interstate Cosmetology Compact. This was important legislation to provide licensees greater portability to work across state lines, while also providing salons and spas a greater pool of potential employees. This legislation passed unanimously and is a good example of bipartisan efforts to help employees and businesses. We would also like to thank Representative Solomon for sponsoring the House companion bill in this effort, [House Bill 365](#).

Here is a review of other House legislation currently introduced to amend the Cosmetology Act, including MAACS' position on the legislation and/or concerns or suggestions with each issue:

[House Bill 58](#) – Proposes to make it easier for salons to do a change-in-location, whereas the change would be conditionally approved upon application to the state. The Department of State would then be required to do an inspection for compliance within 10 days of the application. MAACS “supports” this legislation, but we request it be amended to provide the same expedited change-in-location provision for cosmetology schools too.

[House Bill 59](#) – This legislation proposes to require board inspectors to be licensed cosmetologists for at least 5 years in practice. It also appears to provide any licensee with 5 years of practice to do inspections without being an employee of the PA Department of State, but potentially as a contractor for the state. If our reading of this language is accurate, then we have concerns for potential bias in the inspection process if competitors are allowed to inspect each other, disgruntled former employees can inspect a past employer, or any other scenario that could include bias in the inspection process.

[House Bill 61](#) – Would authorize the practice of “dermaplaning,” which is the use of a surgical blade to scrape away layers of skin. Because this practice can break the skin and lead to bleeding, there are several concerns or questions schools have. They would now likely be required to have “Stericycle” or some other biohazardous waste service at the school. It could lead to higher insurance costs. There are also questions whether a doctor or some other medical professional would need to be on site when this is taught. Finally, the current esthetics license is 300 hours and the content is already jammed for those hours. There is not sufficient time to add additional scope of practice into the current 300 hours of required training.

[House Bill 87](#) – This legislation would change the qualifications to teach apprenticeships in licensed salons. We have concerns for the provision in this legislation that would eliminate the requirement to have a teaching license to instruct apprenticeships. We appreciate the bill's intent to use greater years of experience in practice as a trade-off to eliminate the teacher license. However, experience in the field does not assure an individual knows how to effectively teach this experience to somebody else. Many professionals also spend a lot of their career specializing in certain services or skills, while avoiding other services or skills. A teacher must be able to instruct across many services and skill sets. It's also important to note schools are typically more structured with multiple layers of education oversight (state, federal, and accrediting agencies) that do not necessarily exist in the salon setting. Removing the requirement for teachers to have a teachers license in a salon apprenticeship, while maintaining the requirement they have a teachers license in a school, would further this gap.

[House Bill 644](#) – This bill would authorize “booth rental” in salons. The primary concern schools have on this proposal is there needs to be assurances full earnings (both the fee for services and tips) are being accounted for with each service being conducted in the booth. The federal government through a series of regulations are now holding schools accountable for what is perceived to be “low earnings” of their graduates. Cosmetologists can make very high earnings, but unfortunately the industry already has a lot of under-reporting of earnings to the IRS due to it being a heavily tipped-based profession with a lot of self-employment that is under the table. Thus, cosmetology schools are producing graduates with high earnings potential, but it is not being reflected in IRS data. Booth renting could increase this problem of under-reported earnings, which the federal government is now holding schools accountable for.

We also know in past discussions on this issue, some have been concerned or have had questions about consumer safety with booth rental. Who holds the insurance? Who does a client complain to if there is a problem? Who would they sue if need be? Who is responsible for product for the property?

[House Bill 1082](#) – Would allow for mobile unit salons. The primary question we have for this proposal is how the state would plan to do inspections? Currently, the state can do unannounced inspections of existing salons. How would this occur if the salon is mobile and the state does not know where it is located on any given day?

[House Bill 1290](#) – Although this legislation is not directly under the Cosmetology Act, we believe it is an important bill for the cosmetology industry and all other licensed professions. This bill would authorize the Department of State issue “Advisory Opinions” for questions from the public to its licensing boards. Currently, there are many times licensees or members of the public ask one of any of licensing boards routine questions looking for guidance, but are often given a standard response that the boards cannot provide legal advice. This is very frustrating to licensees and the general public. This legislation would fix this problem.

### **DEBATE OVER HOURS**

Although we are not aware of any legislation proposed on this issue, we do know the question over the best number of required hours has been debated for years. We also have heard the Department of State and the current Cosmetology Board have recently deliberated whether to reduce the hours in Pennsylvania. Furthermore, one of the publicly stated reasons to reduce Pennsylvania’s hours has been to equalize it to neighboring states, specifically referencing New York and New Jersey that both have lower hours than Pennsylvania. We did a national review of hours and wanted to present the results of this review.

- Pennsylvania currently has 1,250 hours required.
- The national range is any where from 1,000 hours in the lowest states and 2,000 hours for the highest, with many states in between these outliers.
- The national median for all 50 states is 1,500 hours.
- Pennsylvania is currently the 12<sup>th</sup> lowest nationally for required hours.
- If the Commonwealth wants to compare its hours to bordering states, then it needs to look beyond just New York and New Jersey. These two states are lower than Pennsylvania, but the other four bordering states are higher: Delaware, Maryland and Ohio are at 1,500 hours, and West Virginia is 1,800 hours.

Thank you for your consideration of this testimony.

Sincerely,

*Aaron Shenck*

Aaron Shenck  
Executive Director – MAACS

[www.maacs.us](http://www.maacs.us)

Pennsylvania House Professional Licensure Committee

Informational Meeting - Sep 29, 2026

**Gopal Patel, MD, FAAD**

**Aesthetic Dermatology Associates, Private Practice, Media and Paoli, Pennsylvania**

**Secretary, Pennsylvania Academy of Dermatology**

Thank you for the opportunity to comment. I am a board-certified dermatologist in Southeastern Pennsylvania. By way of background, a dermatologist is an individual who has typically completed 4 years of undergraduate education, 4 years of medical education, and 4 years of internship/dermatology residency. In my practice, we have a group of nine physicians who care for thousands of patients across Delaware and Chester Counties. We practice all aspects of skin disease, skin cancer, dermatologic surgery, and cosmetic medicine. We employ licensed aestheticians in our office.

I support modernizing the Cosmetology Law. My hope is that modernization will draw a clear line between aesthetic services and the practice of medicine. As the Licensure committee has noted, scope and safety matter wherever an esthetician practices. My colleagues and I regularly treat complications that arise when that line is blurred. I believe this is the prime opportunity to improve patient safety through better definitions and begin to explore medical spa issues as well.

The Cosmetology Law dates to 1933 and has not been materially updated since. Its definition of esthetics lists specific, low-risk services: facial massage, cosmetic preparations and lotions, hair removal by tweezers, depilatories or wax, eyelash perming, and lash and brow tinting. It then adds that esthetics includes "the use of industry standard mechanical and electrical apparatus and appliances." That phrase is very vague. Lasers, intense pulsed light (IPL), radiofrequency microneedling and suction-infusion devices are all marketed to spas by the companies that manufacture the devices. Each could be called "industry standard" by the company selling it. The law should say plainly that aesthetics stays on the skin's surface. Any device or procedure designed to penetrate, heat or injure the skin is the practice of medicine.

Unfortunately, patients cannot tell who is qualified to do what in Pennsylvania. In my office, patients often assume their esthetician or cosmetologist is a dermatologist or has equivalent training. Many believe a spa can diagnose a rash, evaluate a changing spot, and especially treat acne. Estheticians are not licensed to diagnose or treat skin disease, and their training is not designed for it.

| <b>Credential</b>          |                                                                                                                                    | <b>Training required</b> |
|----------------------------|------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| Esthetician (PA license)   | 300 hours                                                                                                                          |                          |
| Cosmetologist (PA license) | 1,250 hours                                                                                                                        |                          |
| Dermatologist              | 4-year college degree, 4 years of medical school, then a 4-year residency focused on skin disease, skin cancer and skin procedures |                          |

That residency is where a physician learns to recognize when a "cosmetic" spot is actually a cancer that needs a biopsy. The public does not know this difference. There is opportunity to educate the public on the distinction of the various licensed professionals, and their training and expertise.

As a dermatology practice, my office regularly treats patients harmed by procedures done with little or no physician involvement. The majority of these are occurrences in “med spas” which are typically run by aestheticians or nurses and apparently have a medical director overseeing the office. The medical director is technically responsible for the care, training, and oversight, but the reality is this person is typically offsite and not trained in skin disease. Three patterns recur:

- **Light treatment of spots that were not diagnosed.** Patients arrive after a spa used a laser or IPL photofacial to remove “brown spots” on the face. Some spots did not respond because they were not simple sun damage. Several needed a biopsy because they looked like melanoma. Treating an undiagnosed lesion as cosmetic can delay a cancer diagnosis. This is my main concern.
- **Burns from lasers and light devices.** We have seen burns, blistering, pigment changes and scarring from misapplied lasers and IPL.
- **Cosmetic filler complications with no follow-up.** Patients have come to us with serious complications after hyaluronic acid filler to the lips or cheeks, and no follow-up from the “med spa” that injected them.

There is published data to support this unfortunate reality. The Dermatologic Surgery article in 2019 found more patient complications occurred by lasers when treated by nonphysicians vs physicians. A JAMA Dermatology study found that lawsuits over laser injuries involving non-physician operators rose from 36% of cases in 2008 to 78% in 2011, especially outside traditional medical settings.

Some specific cosmetic treatments are at risk of living in a grey area. Hydrafacial-type treatments and microdermabrasion are marketed as gentle facials, but they work by breaking down the skin barrier. The devices exfoliate and use suction to strip the outer protective layer. Typically, those treatments are followed by an infusion of liquid serums into the freshly disrupted skin. That combination is concerning. The barrier that normally limits what enters the skin has been removed, and biologically active ingredients such as acids, peptides, growth factors and brightening agents are marketed to be delivered through it. The device companies encourage add-on “booster” serums after each treatment, which increases that exposure, and provides an opportunity to upsell. Deliberately disrupting the barrier to drive active agents into the skin is a medical intervention in our view and belongs within a medical practice.

Regarding the committee’s question on “liquid being put into the skin with needles” that typically refers to microneedling with serums or disposable pen injections. Both modalities are essentially injections and involve skin penetration and belong within the purview of a medical practice as well. Again, the companies that manufacture these devices also suggest post treatment serums which increases risk.

Regarding dermaplaning, that is the act of using a sharp blade to scrape against the facial skin to remove vellus hair (aka peach fuzz), debris, and the top surface of the skin. My preference is that blade procedures stay outside cosmetology spas. If the committee adds dermaplaning for treatment outside of a medical spa, the statute should define it narrowly so it cannot be stretched:

- Removal of fine facial hair and loose surface skin cells only, with a single-edge blade, on intact skin.
- Not over active acne, open sores, rashes, moles, growths or any undiagnosed spot.
- No cutting or shaving of moles, skin tags or other growths.

The law should also list what aesthetics does not include, rather than leave it to “industry standard” interpretation. The American Medical Association already considers neurotoxin and filler injections, laser and IPL procedures to be the practice of medicine. Some excluded services should include:

- Microneedling of any depth and radiofrequency microneedling.
- Lasers, IPL, radiofrequency and other energy-based devices.
- Injections of any kind, including neurotoxins (such as Botox), fillers, platelet-rich plasma (PRP) and needle-free pressure injectors.
- Plasmapens, electrocautery, and removal of moles, skin tags or other growths.
- Diagnosis or treatment of skin disease, including medical treatment of acne.

Clear rules will protect patients and protect aestheticians, who deserve to know exactly what they are licensed to do and carry appropriate liability coverage. I am happy to be available for the committee members for further discussion on licensure definitions for these aesthetic services.

Gopal Patel, MD

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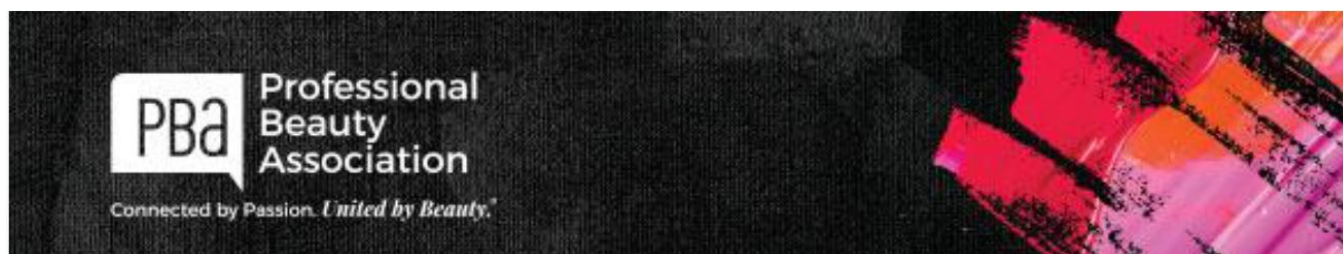
#### **Sources:**

Jalian HR, Jalian CA, Avram MM. Increased risk of litigation associated with laser surgery by nonphysician operators. *JAMA Dermatol*. 2014 Apr;150(4):407-11. doi: 10.1001/jamadermatol.2013.7117. PMID: 24132614.

ASDS Position Statement on Physician Oversight in Medical Spas:

<https://www.asds.net/Portals/0/PDF/asdsa/asdsa-position-statement-physician-oversight-in-medical-spas.pdf>

Rossi, A. M., Wilson, B., Hibler, B. P., & Drake, L. A. (2019). Nonphysician Practice of Cosmetic Dermatology: A Patient and Physician Perspective of Outcomes and Adverse Events. *Dermatologic Surgery*, 45(4), 588–597. <https://doi.org/10.1097/DSS.0000000000001829>



On behalf of the Professional Beauty Association (PBA), I appreciate the opportunity to participate in this forum to discuss reform of Pennsylvania Cosmetology Law. PBA is a national non-profit organization inclusive of the professional beauty industry. PBA strongly encourages and supports collaborative efforts such as the work the state of Pennsylvania is currently undertaking in this review of the statute. My educational and early career background is in nursing (specifically Infection Control) and I came to the professional beauty industry 15 years ago to work as a subject matter expert in health and public safety for the protection of consumers and licensees. In that role, I spent a significant amount of time reviewing rules/laws for states and making recommendations. I currently hold two positions, one as the Director of State Relations and Policy Development for the PBA and the other as the Executive Director for the Cosmetology Compact Commission (which PA joined in 2026). In both of these roles I work with regulatory agencies throughout the country as well as sitting on several national committees and task forces looking at how to create national standards for the industry as a long-term objective.

**Current National Landscape:** For several years, the cosmetology industry has struggled with inconsistent licensing requirements across states. Much of the debate comes from a wide gap in required training hours. Three states (Hawaii, Nebraska, and West Virginia) require 1,800 hours of education. Seven states (California, Texas, New York, Massachusetts, Rhode Island, Virginia, and Vermont) require only 1,000. The remaining states fall between 1,200 and 1,650 hours. This disparity in hours has put cosmetology in the cross hairs of conversations around “barriers to entry”, opening the door for efforts to deregulate in several states. Those efforts have met with little success, but they have pivoted to reduction of hours to 1000 and have gained a lot of ground with that approach. To further confuse the issue, there are multiple pathways to licensure and multiple exams offered, all of which make movement between states challenging. Finally, the recent moves by the Department of Education in the current administration have put Gainful Employment back on the table and threaten Title IV federal student loan funding for private cosmetology schools. Keeping these concepts in mind as you promulgate a new cosmetology law may be helpful.

Pathways to licensure in Pennsylvania include high school (CTC) programs, junior college programs, apprenticeships and private cosmetology school programs. In general, most states report that both HS and JC programs are popular and their graduates have high pass rates on the licensing exams. High school programs in PA are done through the CTC framework and have the students complete the required 1250 hours over three years (grades 10,11 and 12) along with the required high school curriculum. The program allows for 650 of the theory hours to be done via distance learning, up to 350 hours in “internships or job shadowing” and a minimum of 250 hours in person training. In thinking about HS programs, it is important to remember that the more hours a state requires, the harder it is to get students through the full program while in high school. Junior college programs in PA offer a 2-year path to licensure, however in a review of the 14 junior colleges, there does not appear to be any cosmetology stand alone programs.

The success of apprenticeship programs varies widely and is often a product of how the program is set up. For example, regulations that stipulate 1:1 (licensee: apprentice) working format limit the number of apprentices that could ever participate in a program. Similarly, requiring that the apprentice work in a salon setting vs. a solo salon, limits the number of potential apprentices that could work at any given time. That is not to say that those stipulations should not be in place, but the limitations they put on the program must be considered. In Pennsylvania, you offer 6 apprenticeship programs that are registered with the US Department of Labor OL -1 for cosmetology, 4 for hair stylist and 1 for esthetics. The programs vary in length (2348-2714 hours) and meet the requirements for 2000 hours on the job training (OJT) and at least 144 hours of related technical instruction (RTI). There are several requirements in the apprenticeship program that may explain why so few apprentice programs actually exist. First, all apprentices are required to be paid minimum wage (although many are paid more), and the supervisor is required to be a salon owner, have an instructor’s license and 5 years of cosmetology experience. In addition, there must be two additional licensed cosmetologists in the salon per apprentice in the salon when the apprentice is present. Given the economy of salon operations, these requirements, which also require quarterly reporting, may be indicative of why there are so few programs available.

Private cosmetology school programs generally last less than a year and run \$16,000 - \$18,000 (<https://www.milady.com/career-of-possibilities/how-much-is-cosmetology-school>) and many offer Title IV student loan programs. With new guidelines from the Department of Education pending, some of these programs may no longer qualify to offer

Title IV federal student loans, potentially causing the closure of some schools and the possible creation of some education deserts for students interested in cosmetology. Consideration of all aspects of each pathway is important to developing good policy around education for cosmetology.

#### Specific Pennsylvania Statute Considerations (from existing law):

##### From Definitions:

"Braiding" means intertwining the hair in a systematic motion to create patterns in a three-dimensional form, inverting the hair against the scalp along part of a straight or curved row of intertwined hair or twisting the hair in a systematic motion, and includes extending the hair with natural or synthetic hair fibers."

Recommendation: Separate braiding from weaves. While a weave requires a braid, it also uses needles and those should be dealt with in the infection control rules around this service as they are often re-used.

##### From Section 3:

Requirements to Practice – "Before any person may practice or teach cosmetology, such person shall file with the board a written application for license, accompanied **by a health certificate issued by a licensed physician of Pennsylvania on a form which shall be prescribed and supplied by the board**, and shall deposit with the department the license fee, and pass an examination approved by the board as to fitness to practice or teach cosmetology, as hereinafter provided in this act"

Recommendation: Remove from statute the requirement for a physician's health certificate. This can take an inordinate amount of time and money for a licensee and really serves no purpose if they are following infection control standards. Additionally, this visit to a physician is only a snapshot of a specific moment in time and would likely not uncover any infectious illness unless a patient were symptomatic. The practice of cosmetology is full of interaction with the public and as such, having a certificate of health is only as good as the moment it is written and maybe not even then.

##### From Section 4 and multiple other locations in the statute (4.1, 4.3, 5, 6.1.ii):

Eligibility Requirements for Examination -(a) No person shall be permitted by the board to receive a license as a cosmetologist unless such person (1) shall be at least sixteen years of age **and of good moral character** at the time of making application,

Recommendation: Remove – this is not something objective that can be measured and who is the arbiter of what constitutes "good moral character". The decision not to allow someone to sit for an exam or be licensed in PA based on them not having "good moral character" is not defensible and should be removed. If there are specific things that denote either good moral character or bad moral character, list them out in rules as requirements for licensure.

From Section 6.1.iii

***Are free from contagious or infectious disease***

Recommendation: Remove this or re-word. Infectious diseases like herpes, cold sore, HIV and a whole host of other illnesses pose no threat to consumers, especially when infection control rules are well written, followed and inspected.

From Section 6.2:

***Employ and maintain a sufficient number of competent teachers, registered as such.***

Recommendation: How is this objectively measured? If there specific teacher to student ratios that should be here. If there are specific measures of competency that should be listed here.

From Section 6:

***(2) Practical demonstrations and theoretical studies, and study in sanitation, sterilization and the use of antiseptics and disinfectants, cosmetics and electrical***

Recommendation: Please add the word “disinfectants” as indicated in red. I do not see where sterilization is required for anything in cosmetology so consider removing that term – sterilization and disinfection are not the same thing.

From Section 12:

Examinations shall be held at ***least four times a year in the metropolitan areas of Philadelphia, Pittsburgh, Wilkes-Barre, Harrisburg, and Erie at such hours*** as it shall prescribe pursuant to section 812.1 of the act of April 9, 1929 (P.L.177, No.175), known as "The Administrative Code of 1929."

Recommendation: Consider option of remote proctoring for testing of students. In 2026, this technology is very advanced and insures that even students living a distance from a testing site are able to test without the cost of traveling to one of these 4 sites.

From Section 19:

***(c) Any person who fails to renew his license or has escrowed his license for a period of five years without renewing his license shall, prior to receiving a license, submit to and pass an examination appropriate to the license being sought.***

(19 amended June 30, 1984, P.L.479, No.100)

Recommendation: Is this for simple late to renew status? The reciprocity standard for PA allows someone who has 2 years work experience to obtain a PA license, so requiring your own licensee who misses the renewal date to re-examine seems extreme.

From Section 20:

***(b) An individual holding a cosmetology license or limited license or individual registered as an apprentice who shall practice while knowingly suffering from contagious or infectious disease, or who shall knowingly serve any person afflicted with such disease, shall be guilty of a summary offense, and, upon conviction thereof, shall be sentenced to pay a fine not exceeding three hundred dollars (\$300.00), or undergo an imprisonment not exceeding thirty (30) days, or both, at the discretion of the court. ((b) amended July 7, 2006, P.L.704, No.99)***

Recommendation: Remove – this would be impossible to prove and while the intent is good, this should be handled in rules around infection control. These licensees are not medically trained and should not be held to the standard that asks them to “diagnose” whether something is contagious or not. In addition, if a client tells a licensee that they are not contagious, the licensee can stop the service but is not in a position to argue with the client over this type of medical issue.

Respectfully Submitted,

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## INSTITUTE FOR JUSTICE

Dear Chair Burns, Chair Emrick, and members of the House Professional Licensure committee:

My name is Rachel Gonzalez, and I am with the Institute for Justice, a national nonprofit that has worked alongside beauty professionals for more than 30 years to make it easier to earn an honest living. Through our Beauty, Not Barriers initiative, we work directly with beauty professionals to help them advocate for change. Their experiences, together with our research, guide the practical reforms we recommend.

Thank you for considering how Pennsylvania's cosmetology laws could better serve aspiring professionals and small business owners. We recommend two reforms that would give more people across Pennsylvania a practical way to get to work.

**First, we recommend exempting makeup application and blow-dry styling from licensure.**

Think about someone who wants to do wedding makeup or provide blowouts. In Pennsylvania, the esthetician license needed for makeup requires 300 hours of school. The cosmetology license needed for blow-dry styling requires 1,250 hours. Aspiring stylists can spend months training in services they never intend to offer, just to get permission to use skills they may already have.

Someone using a blow dryer and brush shouldn't have to learn to cut and chemically treat hair. For professionals building careers around weddings and other special events, current training requirements don't fit their needs.

Nineteen states already exempt makeup artistry from licensure, and ten exempt blow-dry styling. Pennsylvania should follow their lead.

Similar exemptions have been introduced in Pennsylvania multiple times over the past few years. We encourage the committee to revisit them.

**Second, we recommend creating a salon training program that lets people earn a living while working under a licensed professional's supervision.**

Our analysis of federal data published in our [\*Beauty School Debt and Drop-Outs report\*](#) found Pennsylvania cosmetology programs cost nearly \$17,000 on average, with an average on-time graduation rate of just 17 percent. And, seven senate districts have only one cosmetology school—or none at all—making such an education difficult to obtain, even if students can afford the tuition. For many people, particularly parents balancing work and childcare, the cost and time commitment can put this career out of reach.



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Under a salon training program, a salon owner could hire someone with potential and teach them on the job. Participants would first complete a four-hour, board-approved sanitation course, register with the board, and work under licensed supervision in registered, licensed, and inspected salons. Iowa enacted a version of this model in 2025.

Imagine a salon owner who wants to teach a promising employee to cut hair. This would let that employee build skills and bring home a paycheck while the owner grows their business. Workers could pursue a license or keep earning under supervision, depending on what fits their lives. Under the Iowa model, for example, after 2,000 hours of work under supervision, a trainee can take the state board exam and become licensed.

School would remain an option, but training should not be one-size-fits-all. Importantly, the people these programs serve are generally not potential students—they are people for whom school would never be a realistic option.

And, while my remarks today center on cosmetology because of the focus of this hearing, we encourage the committee to apply this training option to barbers as well.

We also have evidence that demanding more schooling does not necessarily make services safer. Our [Clean Cut study](#) compared thousands of health inspections of nail salons and barbershops across four states. Businesses facing lighter licensing requirements, or no individual licensing requirement, were just as clean and safe as those facing high requirements. The need to get and keep customers is reason enough for most barbershops and beauty salons to provide a safe, clean service—whether their workers spent thousands of hours in school or zero.

Your packet of materials includes a one pager of our reform recommendations, Pennsylvania cosmetology school cost and wage data, a map showing districts with one or fewer schools, and our research reports. It also includes stories from Pennsylvania beauty professionals who support these changes and stand to benefit greatly from them.

For your constituents, these changes could mean a new source of family income, a job at a local salon, or the chance to open a business.

Thank you for your time and for considering these recommendations.

Sincerely,

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