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Fast-Track Regulation Agency Background Document

Agency name	Board for Barbers and Cosmetology
Virginia Administrative Code (VAC) Chapter citation(s)	18 VAC 41-20
VAC Chapter title(s)	Barbering and Cosmetology Regulations
Action title	Barbers and Cosmetology Examination Eligibility Amendment
Date this document prepared	August 13, 2026

This information is required for executive branch review and the Virginia Registrar of Regulations, pursuant to the Virginia Administrative Process Act (APA), Executive Order 19 (2022) (EO 19), any instructions or procedures issued by the Office of Regulatory Management (ORM) or the Department of Planning and Budget (DPB) pursuant to EO 19, the Regulations for Filing and Publishing Agency Regulations (1 VAC 7-10), and the *Form and Style Requirements for the Virginia Register of Regulations and Virginia Administrative Code*.

Brief Summary

Provide a brief summary (preferably no more than 2 or 3 paragraphs) of this regulatory change (i.e., new regulation, amendments to an existing regulation, or repeal of an existing regulation). Alert the reader to all substantive matters. If applicable, generally describe the existing regulation.

The regulatory action revises the examination eligibility requirements to provide less burdensome pathways for licensed cosmetologists to obtain a barber or master barber license through examination following changes to the cosmetology scope of practice enacted by Chapter [102](#) (HB 2669) of the 2025 Acts of Assembly. Effective July 1, 2025, HB 2669 removed shaving from the scope of practice of cosmetologists, limiting straight razor shaving services to licensed barbers.

The regulatory change allows individuals who were licensed as cosmetologists in Virginia prior to July 1, 2025, to qualify to obtain a barber or master barber license by passing only the practical examination, which tests the ability to perform in the occupation. This recognizes that these individuals were previously authorized to perform straight razor shaving prior to the

statutory change and provides a less burdensome means of obtaining the appropriate barber license. The action also allows licensed cosmetologists with a minimum of one year of licensed work experience to qualify for the barber or master barber theory and practical examinations. Currently, cosmetologists are required to have a minimum of two years of licensed work experience to qualify for the master barber examination. The amendment provides an additional licensure option for experienced cosmetologists who wish to obtain a barber license rather than a master barber license.

The regulatory action also establishes a comparable examination pathway for licensed master barbers seeking cosmetology licensure. The amendments reduce the required licensed work experience from two years to one year for master barbers to qualify for the cosmetology theory and practical examinations.

The action also reduces the minimum amount of qualifying experience for those who have professional experience from service in the United States Armed Forces. The experience required for such individuals to sit for license examinations is reduced from two years to one year.

Acronyms and Definitions

Define all acronyms used in this form, and any technical terms that are not also defined in the "Definitions" section of the regulation.

"DPOR" means Department of Professional and Occupational Regulation.

"VDOE" means Virginia Department of Education.

Statement of Final Agency Action

Provide a statement of the final action taken by the agency including: 1) the date the action was taken; 2) that the agency has "adopted final amendments" to the regulation; 3) the name of the agency taking the action; and 4) the title of the regulation. A suggested statement is, "On [insert date] the Board/Department of [insert name] adopted final amendments to the [title of regulation(s)]."

On May 4, 2026, and August 3, 2026, the Board for Barbers and Cosmetology adopted final amendments to the Barbering and Cosmetology Regulations.

Mandate and Impetus

Identify the mandate for this regulatory change and any other impetus that specifically prompted its initiation (e.g., new or modified mandate, petition for rulemaking, periodic review, or board decision). For purposes of executive branch review, "mandate" has the same meaning as defined in the ORM procedures, "a directive from the General Assembly, the federal government, or a court that requires that a regulation be promulgated, amended, or repealed in whole or part."

Consistent with Virginia Code § 2.2-4012.1, also explain why this rulemaking is expected to be noncontroversial and therefore appropriate for the fast-track rulemaking process.

The primary impetus for this regulatory action is the enactment of Chapter [102](#) (HB 2669) of the 2025 Acts of Assembly, which amended the statutory scope of practice for cosmetologists by removing shaving from the cosmetology scope of practice effective July 1, 2025. As a result of this legislative change, straight razor shaving services may only be lawfully performed by individuals licensed to perform barbering.

The legislative change has adversely affected licensed cosmetologists who previously were allowed to provide straight razor shaving services to the public and those who might have sought to provide these services as a licensed cosmetologist.¹ In March 2026, the Board convened a meeting of board members and stakeholders to address concerns raised from the regulated community and develop a potential regulatory solution.²

This regulatory action was initiated to respond to the statutory change by revising examination pathways for licensed cosmetologists to obtain licensure to perform barbering. The Board also determined that amendments to the examination eligibility requirements were necessary to provide an efficient mechanism for cosmetologists to obtain a barber or master barber license while ensuring compliance with the revised statutory scope of practice.

The regulatory action also amends the examination pathway for master barbers to obtain licensure as cosmetologists by reducing the work experience requirement to a minimum of one year for eligibility to take the cosmetology examinations.

An additional impetus for this regulatory change is a review of examination eligibility requirements related to those with prior professional experience in the United States Armed Forces. Upon review, the current examination eligibility requirements are more stringent than other examination pathways in the regulation following recent changes that reduced the minimum training hours for individuals to become qualified for examination to obtain licensure as a barber or cosmetologist.

These changes are expected to be beneficial for (i) cosmetologists who were able to lawfully perform straight razor shaving prior to July 1, 2025, as it reduces the regulatory burden to be able to continue to provide this service lawfully; (ii) individuals who are currently licensed as cosmetologists or master barbers as it will reduce their regulatory burden to obtain additional licensure if so desired; and (iii) individuals with professional experience in the Armed Forces, as it reduces the regulatory burden to obtain a license, all without reducing protection of the public health, safety, and welfare. Accordingly, this regulatory action is expected to be non-controversial and appropriate for the fast-track rulemaking process.

Legal Basis

Identify (1) the promulgating agency, and (2) the state and/or federal legal authority for the regulatory change, including the most relevant citations to the Code of Virginia and Acts of Assembly chapter number(s), if applicable. Your citation must include a specific provision, if any, authorizing the promulgating agency to regulate this specific subject or program, as well as a reference to the agency's overall regulatory authority.

¹ Refer to public comment received by the Board for Barbers and Cosmetology at its [meeting](#) on February 23, 2026. Adverse effects identified by commenters included (i) financial burden on shop owners; and (ii) barriers to working.

² Refer to the meeting minutes of the [Straight Razor Shaving Workshop](#) held on March 30, 2026.

The promulgating agency is the Board for Barbers and Cosmetology.

Section 54.1-201 of the Code of Virginia provides, in part:

A. The powers and duties of regulatory boards shall be as follows:

1. To establish the qualifications of applicants for certification or licensure by any such board, provided that all qualifications shall be necessary to ensure either competence or integrity to engage in such profession or occupation.

5. To promulgate regulations in accordance with the Administrative Process Act (§ 2.24000 et seq.) necessary to assure continued competency, to prevent deceptive or misleading practices by practitioners and to effectively administer the regulatory system administered by the regulatory board. The regulations shall not be in conflict with the purposes and intent of this chapter or of Chapters 1 (§ 54.1-100 et seq.) and 3 (§ 54.1-300 et seq.) of this title.

Purpose

Explain the need for the regulatory change, including a description of: (1) the rationale or justification, (2) the specific reasons the regulatory change is essential to protect the health, safety or welfare of citizens, and (3) the goals of the regulatory change and the problems it is intended to solve.

This regulatory action is necessary to address the Board's current examination eligibility requirements in response to the statutory changes from HB 2669, which removed shaving from the scope of practice of cosmetologists effective July 1, 2025. Prior to the statutory change, licensed cosmetologists were authorized to perform straight razor shaving services. As a result of the legislation, cosmetologists who wish to continue providing those services must obtain either a barber license or master barber license, and meet current examination eligibility requirements. The regulatory change will mitigate the adverse impact of the statutory change by providing a means for licensed cosmetologists to lawfully perform straight razor shaving with the minimum amount of additional regulatory burden necessary to ensure that such services can be provided safely.

The modification to the regulations creates examination pathways that acknowledge the work experience that cosmetology licensees already have while ensuring they demonstrate competency in the barber profession through the required examination process.

The regulatory change protects the health, safety, and welfare of the public by ensuring that individuals performing straight razor shaving services hold the appropriate barber or master barber license and have demonstrated the knowledge and skills necessary to practice safely. These amendments maintain public protection by ensuring applicant competency through mandatory examination.

The goals of the regulatory action are to provide efficient and equitable examination pathways for cosmetologists and master barbers seeking additional licensure and to eliminate unnecessary barriers to licensure for experienced practitioners. By reducing certain work experience requirements and recognizing prior licensure and practice, the amendments allow qualified individuals to obtain the appropriate license more efficiently while maintaining professional competency standards and ensuring continued compliance with Virginia law.

An additional goal of the regulatory change is to align the examination qualification pathway for those with professional experience in the Armed Forces with recently reduced training requirements for the barbering and cosmetology professions. As a consequence of regulatory amendments effective in September 2024 and December 2025, the minimum training hours for barber, master barber, and cosmetologist licenses were reduced. A result of these reductions is that the qualification pathway for those with experience in the Armed Forces is effectively more stringent than other qualification pathways in the regulation. Further, this higher level of stringency appears to make the regulation inconsistent with the requirements of § 54.1-118 of the Code of Virginia, which provides that regulatory boards must accept military training, education, or experience that is substantially equivalent to the requirements in law or regulation for the issuance of an occupational license. This regulatory action addresses the apparent inconsistency.

Substance

Briefly identify and explain the new substantive provisions, the substantive changes to existing sections, or both. A more detailed discussion is provided in the "Detail of Changes" section below.

Section 18VAC41-20-20.B, which provides for examination eligibility, is proposed to be amended to:

- Allow licensed cosmetologists with a minimum of one year of licensed work experience to qualify for the master barber written and practical examinations instead of the current requirement of two years and allow for licensed cosmetologists to test for a barber license, instead of just a master barber license.
- Reduce the required licensed work experience from two years to one year for a licensed master barber to qualify for the cosmetology written and practical examinations.
- Add a provision establishing that individuals who were licensed as cosmetologists in Virginia prior to July 1, 2025, are eligible to take either the barber or master barber practical examination and are exempt from taking the barber or master barber written examination.
- Reduce the minimum amount of required experience that an applicant with experience in the United States Armed Forces must have to qualify for license examination.

Issues

Identify the issues associated with the regulatory change, including: 1) the primary advantages and disadvantages to the public, such as individual private citizens or businesses, of implementing the new or amended provisions; 2) the primary advantages and disadvantages to the agency or the Commonwealth; and 3) other pertinent matters of interest to the regulated community, government officials, and the public. If there are no disadvantages to the public or the Commonwealth, include a specific statement to that effect.

The primary advantage of this regulatory action is that it establishes an efficient and less burdensome pathway for experienced licensed cosmetologists adversely impacted by HB 2669 to obtain a barber or master barber license. This amendment enables licensed cosmetologists to obtain a barber or master barber license by recognizing prior work experience while maintaining appropriate examination requirements. This action ensures that cosmetologists

licensed prior to July 1, 2025, may continue providing straight razor shaving services in compliance with Virginia law, conditional upon passing a practical examination.

Another advantage of this amendment is that it allows licensed cosmetologists with a minimum of one year of work experience to qualify for the barber or master barber theory and practical examinations. This adjustment reduces the prior requirement of two years of licensed work experience necessary to qualify for the master barber examination. This regulatory adjustment reduces barriers to licensure and provides clearer eligibility requirements for performing straight razor shaving without compromising public safety and protection. The regulatory action also provides licensed master barbers with a comparable pathway to obtain cosmetologist licensure.

An additional advantage is that individuals with professional experience in the Armed Forces will be able to test for a license based on a qualification pathway that is equivalent to those that are available to other types of applicants.

A potential advantage to the public and the Commonwealth is that more individuals may be available to provide services to the public, while still ensuring that licensed individuals are competent to provide services to the public safely.

There are no identifiable disadvantages to the public. Cosmetologists must continue to demonstrate competency by passing the applicable licensing examinations before being authorized to practice as a barber or master barber.

There are no identifiable disadvantages to the agency or the Commonwealth.

There are no other matters of interest to the regulated community, government officials, and the public that have been identified.

Requirements More Restrictive than Federal

Identify and describe any requirement of the regulatory change which is more restrictive than applicable federal requirements. Include a specific citation for each applicable federal requirement, and a rationale for the need for the more restrictive requirements. If there are no applicable federal requirements, or no requirements that exceed applicable federal requirements, include a specific statement to that effect.

There are no applicable federal requirements.

Agencies, Localities, and Other Entities Particularly Affected

Consistent with § 2.2-4007.04 of the Code of Virginia, identify any other state agencies, localities, or other entities particularly affected by the regulatory change. Other entities could include local partners such as tribal governments, school boards, community services boards, and similar regional organizations. "Particularly affected" are those that are likely to bear any identified disproportionate material impact which would not be experienced by other agencies, localities, or entities. "Locality" can refer to either local governments or the locations in the Commonwealth where the activities relevant to the regulation or regulatory change are most likely to occur. If no agency, locality, or entity is particularly affected, include a specific statement to that effect.

Other State Agencies Particularly Affected

No other state agencies are particularly affected.

Localities Particularly Affected

No localities are particularly affected.

Other Entities Particularly Affected

No other entities are particularly affected.

Economic Impact

Consistent with § 2.2-4007.04 of the Code of Virginia, identify all specific economic impacts (costs and/or benefits), anticipated to result from the regulatory change. When describing a particular economic impact, specify which new requirement or change in requirement creates the anticipated economic impact. Keep in mind that this is the proposed change versus the status quo.

Impact on State Agencies

<i>For your agency:</i> projected costs, savings, fees or revenues resulting from the regulatory change, including: a) fund source / fund detail; b) delineation of one-time versus on-going expenditures; and c) whether any costs or revenue loss can be absorbed within existing resources	The Board for Barbers and Cosmetology's revenue may increase due to this regulatory change. In order to resume straight razor shaving, cosmetologists need to be licensed as a barber or master barber, which will require them to pay the \$120 licensing fee. It is estimated that those advocating for this additional pathway are at most 2-3% of currently licensed cosmetologists, resulting in potential additional revenue of between \$98,400 and \$147,600 (given the two year period renewal cycle this is likely to be annualized at \$49,200 to \$73,800). Additional revenue may result from reduction of the examination qualification for those with prior experience in the Armed Forces. This additional revenue will be in fund 09222 DPOR dedicated special revenue fund and an ongoing revenue stream.
<i>For other state agencies:</i> projected costs, savings, fees or revenues resulting from the regulatory change, including a delineation of one-time versus on-going expenditures.	There are no anticipated impacts to other state agencies resulting from the proposed regulatory change.
<i>For all agencies:</i> Benefits the regulatory change is designed to produce.	This regulatory change will (i) increase the ability of those who are currently licensed by the Board as a cosmetologist or master barber to obtain additional licensure and provide more services to the public; (ii) allow cosmetologists licensed prior to July 1, 2025 another pathway to resume straight razor

	shaving, for those where it was part of their operations when it was within their scope of practice; and (iii) reduce the stringency of the current qualification pathway for those with experience from their military service. These changes may increase the number of individuals who are licensed by the Board. The primary benefit to the agency is an expected increase in revenue from initial license applications and license renewals.
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Impact on Localities

If this analysis has been reported on the ORM Economic Impact form, indicate the tables (1a or 2) on which it was reported. Information provided on that form need not be repeated here.

Projected costs, savings, fees or revenues resulting from the regulatory change.	There are no anticipated impacts to localities regulation from the regulatory change.
Benefits the regulatory change is designed to produce.	The regulatory change is not anticipated to produce any benefits for localities.

Impact on Other Entities

If this analysis has been reported on the ORM Economic Impact form, indicate the tables (1a, 3, or 4) on which it was reported. Information provided on that form need not be repeated here.

Description of the individuals, businesses, or other entities likely to be affected by the regulatory change. If no other entities will be affected, include a specific statement to that effect.	This will affect (i) individuals who are currently or will be licensed by the Board as a cosmetologist or a master barber; (ii) individuals who were licensed as cosmetologists prior to July 1, 2025, who were adversely affected by the statutory change to the scope of practice of cosmetology; and (iii) applicants for licensure who have prior professional experience from military service.
Agency's best estimate of the number of such entities that will be affected. Include an estimate of the number of small businesses affected. Small business means a business entity, including its affiliates, that: a) is independently owned and operated and; b) employs fewer than 500 full-time employees or has gross annual sales of less than \$6 million.	As of August 1, 2026, there are 2,192 licensed master barbers, and 41,962 licensed cosmetologists that would be affected by the change to the extent these individuals choose to pursue additional licensure. There are unknown number of potential applicants for licensure who have prior professional experience from their military service who would be affected by the change. Businesses are not anticipated to be directly affected by the change. However, many

	businesses are owned or operated by licensed individuals who would be directly affected by the change. These include businesses with licensed cosmetologists who provided straight razor shaving services prior to the statutory change in July 2025. Most of these businesses are likely to be small businesses.
All projected costs for affected individuals, businesses, or other entities resulting from the regulatory change. Be specific and include all costs including, but not limited to: a) projected reporting, recordkeeping, and other administrative costs required for compliance by small businesses; b) specify any costs related to the development of real estate for commercial or residential purposes that are a consequence of the regulatory change; c) fees; d) purchases of equipment or services; and e) time required to comply with the requirements.	The regulatory change is not anticipated to result in any additional costs to individuals, businesses, or other entities. All applicants for licensure are required to pay fees for licensure and examination.
Benefits the regulatory change is designed to produce.	This regulatory change will (i) increase the ability of those who are currently licensed by the Board as a cosmetologist or master barber to obtain additional licensure and provide more services to the public; (ii) allow cosmetologists licensed prior to July 1, 2025 another pathway to resume straight razor shaving, for those where it was part of their operations when it was within their scope of practice; and (iii) reduce the stringency of the current qualification pathway for those with experience from their military service.

If this analysis has been reported on the ORM Economic Impact form, indicate the tables (1a, 3, or 4) on which it was reported. Information provided on that form need not be repeated here.

Alternatives to Regulation

Describe any viable alternatives to the regulatory change that were considered, and the rationale used by the agency to select the least burdensome or intrusive alternative that meets the essential purpose of the regulatory change. Also, include discussion of less intrusive or less costly alternatives for small businesses, as defined in § 2.2-4007.1 of the Code of Virginia, of achieving the purpose of the regulatory change.

The primary alternative considered was maintaining the current regulatory requirements. Under the existing regulations, licensed cosmetologists are required to have a minimum of two years of licensed work experience to qualify for the master barber written and practical examinations,

and licensed master barbers are required to have a minimum of two years of licensed work experience to qualify for the cosmetology written and practical examinations. In addition, individuals with professional experience in the United States Armed Forces would need to have two years of experience to qualify for license examination.

The Board determined that maintaining the status quo would not address the changes resulting from HB 2669, which removed shaving from the cosmetology scope of practice effective July 1, 2025. Retaining the existing work experience requirements would unnecessarily delay licensure for experienced practitioners seeking to continue providing services that now require a barber license. The Board selected the proposed regulatory amendments because they represent the least burdensome approach to conforming to statute while reducing unnecessary barriers to licensure by recognizing licensed work experience.

In addition, the Board determined that maintaining the status quo with respect to individuals with professional experience in the Armed Forces effectively requires these individuals to meet a higher standard to qualify for license examination than other types of applicants. This restricts the ability of these with prior military service who would otherwise be qualified for a license to obtain one. This is not a viable alternative.

The regulatory action continues to require applicants to pass the applicable examinations before obtaining the additional license. This approach ensures that competency standards are maintained.

This change is not burdensome or intrusive to small businesses.

If this analysis has been reported on the ORM Economic Impact form, indicate the tables on which it was reported. Information provided on that form need not be repeated here.

Regulatory Flexibility Analysis

Consistent with § 2.2-4007.1 B of the Code of Virginia, describe the agency's analysis of alternative regulatory methods, consistent with health, safety, environmental, and economic welfare, that will accomplish the objectives of applicable law while minimizing the adverse impact on small business. Alternative regulatory methods include, at a minimum: 1) establishing less stringent compliance or reporting requirements; 2) establishing less stringent schedules or deadlines for compliance or reporting requirements; 3) consolidation or simplification of compliance or reporting requirements; 4) establishing performance standards for small businesses to replace design or operational standards required in the proposed regulation; and 5) the exemption of small businesses from all or any part of the requirements contained in the regulatory change.

1. There are no less stringent regulatory alternatives that would minimize any adverse impact on small businesses. The proposed amendments revise examination eligibility requirements for individual licensees and do not impose any new compliance or reporting requirements on small businesses.
2. The regulatory action does not establish or modify any compliance, reporting schedules, or deadlines applicable to small businesses. Therefore, no less stringent schedules or deadlines were considered.

3. The regulatory action does not create new compliance or reporting requirements for small businesses. There are no compliance or reporting requirements that could be consolidated or simplified for small businesses.
4. The regulatory action does not establish design or operational standards for small businesses. Therefore, performance standards for small businesses are not applicable.
5. Licenses issued pursuant to this regulatory action are issued to individual practitioners rather than businesses. As a result, the regulatory action does not impose requirements on small businesses.

If this analysis has been reported on the ORM Economic Impact form, indicate the tables on which it was reported. Information provided on that form need not be repeated here.

Public Participation

Indicate how the public should contact the agency to submit comments on this regulation, and whether a public hearing will be held, by completing the text below.

Consistent with § 2.2-4011 of the Code of Virginia, if an objection to the use of the fast-track process is received within the 30-day public comment period from 10 or more persons, any member of the applicable standing committee of either house of the General Assembly or of the Joint Commission on Administrative Rules, the agency shall: 1) file notice of the objections with the Registrar of Regulations for publication in the Virginia Register and 2) proceed with the normal promulgation process with the initial publication of the fast-track regulation serving as the Notice of Intended Regulatory Action.

If you are objecting to the use of the fast-track process as the means of promulgating this regulation, please clearly indicate your objection in your comment. Please also indicate the nature of, and reason for, your objection to using this process.

The Board for Barbers and Cosmetology is providing an opportunity for comments on this regulatory proposal, including but not limited to (i) the costs and benefits of the regulatory proposal and any alternative approaches, (ii) the potential impacts of the regulation, and (iii) the agency's regulatory flexibility analysis stated in this background document.

Anyone wishing to submit written comments for the public comment file may do so through the Public Comment Forums feature of the Virginia Regulatory Town Hall web site at: <https://townhall.virginia.gov>. Comments may also be submitted by mail, email or fax to:

Ashley Reed, Executive Director
Board for Barbers and Cosmetology
Department of Professional and Occupational Regulation
9960 Mayland Drive, Suite 400
Richmond, Virginia 23233.
Telephone: (804) 367-8590
Fax: (866) 245-9693
Email barbercosmo@dpor.virginia.gov

In order to be considered, comments must be received by 11:59 pm on the last day of the public comment period.

A public hearing will not be held.

Detail of Changes

List all regulatory changes and the consequences of the changes. Explain the new requirements and what they mean rather than merely quoting the text of the regulation. For example, describe the intent of the language and the expected impact. Describe the difference between existing requirement(s) and/or agency practice(s) and what is being proposed in this regulatory change. Use all tables that apply, but delete inapplicable tables.

If an existing VAC Chapter(s) is being amended or repealed, use Table 1 to describe the changes between existing VAC Chapter(s) and the proposed regulation. If existing VAC Chapter(s) or sections are being repealed and replaced, ensure Table 1 clearly shows both the current number and the new number for each repealed section and the replacement section.

Table 1: Changes to Existing VAC Chapter(s)

Current chapter-section number	New chapter-section number, if applicable	Current requirements in VAC	Change, intent, rationale, and likely impact of new requirements
20-20	N/A	Establishes the requirements for a barber, master barber, cosmetologist, nail technician, or wax technician license. The section provides that an individual wishing to engage in the regulated activities (barbering, cosmetology, nail care, or waxing) must obtain a license in compliance with the applicable provisions of the Code of Virginia. The section provides for general licensure requirements including to: • Provide a physical address. • Disclose any prior felony convictions occurring within 10 years of the date of application. • Be in good standing in Virginia and all other	The section is revised to add a provision establishing that an individual who was licensed as a cosmetologist in Virginia prior to July 1, 2025, is eligible to take either the barber or master barber practical examination and is exempt from the barber or master barber written examination.³ This change allows for a cosmetologist licensed by the Board prior to July 1, 2025, to qualify for a barber or master barber license by demonstrating through examination the ability to perform in these occupations. The change is made in response to a recent legislative change. As a result of Chapter 102 (HB 2669) of the 2025 Acts of Assembly, which removed shaving from the legal scope of practice for cosmetologists, the performing of straight razor shaving services became limited only to licensed barbers and master barbers.

³ The Board's regulations require applicants for licensure to pass two license examinations: (i) a written (theory) examination, which tests an applicant's knowledge to perform in the occupation; and (ii) a practical examination, which tests an applicant's ability to perform in the occupation.

		jurisdictions where licensed, certified, or registered; and to disclose any prior disciplinary action taken. The section further provides for the qualifications for an applicant to sit for the Board-approved license examination. An applicant completing the following training in Virginia is eligible for examination: • An approved training program from a school licensed by the Board; or • A public school program approved by VDOE. • A registered apprenticeship • Training in a Virginia state institution. An applicant that completed training outside of Virginia is eligible for examination, provided the training program is substantially equivalent to the Virginia program. The applicant must provide documentation of the substantially equivalent training. Applicants earning a degree from an institution outside of the United States are required to have their degree translated, authenticated, and evaluated by an education evaluation service if credit is sought for the education. The Board, in its discretion, may decline to accept any evaluation submitted by an applicant An applicant who completed training outside of Virginia, including outside of the United States, that is not substantially equivalent to Virginia training, may substitute three (3) years of work experience for training.	Consequently, cosmetologists licensed prior to July 1, 2025, who wish to lawfully continue providing those services must obtain a license as either a barber or a master barber. As detailed in the “Mandate and Impetus” section of this background document, the legislative change has adversely affected members of the regulated community. The regulatory change will mitigate the adverse impact of the statutory change by providing a means for licensed cosmetologists to lawfully perform straight razor shaving with the minimum amount of additional regulatory burden necessary to ensure that such services can be provided safely. This new pathway recognizes that these individuals were previously authorized to perform straight razor shaving prior to the statutory change and provides a more efficient means of obtaining the appropriate barber license. The provisions of the section are also revised to provide that (i) a Virginia licensed cosmetologist with a minimum of one (1) year of work experience is eligible for either the barber or master barber examination; and (ii) a Virginia licensed master barber with a minimum of one (1) year of work experience is eligible for the cosmetology examination. This change allows for a cosmetologist licensed by the Board that meets the minimum work experience requirement to test for a barber license. Currently, such an individual can only qualify to test for a master barber license. However, an individual who is qualified to be a master barber would also otherwise be qualified to practice barbering and hold a license as a barber. The change also reduces the minimum amount of experience a cosmetologist must have to qualify to take barbering license examinations. Similarly, the change reduces the minimum amount of experience a master barber licensed by the Board must have to qualify to test for a cosmetology license.
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		The applicant must provide documentation of work experience on a Board-provided form. The section provides that any applicant who has a minimum of two (2) years of experience in the United States Armed Forces and provides documentation of experience satisfactory to the Board is eligible for the license examination. The section further provides that Virginia licensed cosmetologists with a minimum of two (2) years of work experience are eligible for the master barber license examination, and that Virginia licensed master barbers with two (2) years of work experience are eligible for the cosmetology license examination.	These changes are made partly in response to the HB 2669 legislative change to the scope of practice for cosmetology as it may allow experienced cosmetologists who were or will be licensed after July 1, 2025, to obtain licensure as a barber or master barber upon passing both a theory and practical examination. Some individuals currently enrolled in cosmetology training programs are being trained under previously approved curricula that includes instruction on straight razor shaving.⁴ The change will allow these individuals to potentially qualify for a license to provide this service as a barber or master barber. The Board also determined that the current experience threshold of two years is too high and that licensed individuals would be competent based on one year of experience and passing of the license examinations. These changes allow individuals who are currently licensed and have demonstrated minimum competency to safely engage in related occupations to obtain additional licensure more efficiently while maintaining professional competency standards and ensuring continued compliance with Virginia law. The regulatory change protects the health, safety, and welfare of the public by ensuring that individuals performing straight razor shaving services hold the appropriate barber or master barber license and have demonstrated the knowledge and skills necessary to practice safely. These amendments maintain public protection by ensuring applicant competency through mandatory examination. In addition, this section is revised to reduce from two (2) years to one (1) year
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⁴ The requirement for cosmetology training to include instruction on straight razor shaving was in effect from September 1, 2024, to November 30, 2025. The Board adopted [regulatory guidance](#) permitting students who enrolled in a cosmetology program after September 1, 2024, and before November 30, 2025, to complete training under the approved curriculum in effect during that period. Such students have until December 31, 2026, to complete their training programs to be eligible for the cosmetology examinations.

		the minimum amount of experience an applicant with experience in the United States Armed Forces must have to qualify for license examination. This change is made to align this examination qualification pathway with recently reduced training requirements for the barbering and cosmetology professions. Effective December 1, 2025, the minimum required training for a barber was reduced from 1,100 hours to 750 hours. Effective September 1, 2024, the minimum required training for a cosmetologist was reduced from 1,500 to 1,000. One year of experience is equivalent to the current training requirements for barbers and cosmetologists. As a result of the recent reductions in training requirements, the current qualification pathway for those with experience in the Armed Forces are effectively more stringent than other qualification pathways in the regulation. This restricts the ability of those with prior military service who would otherwise be qualified for a license to obtain one. In addition, this more stringent qualification pathway in the regulation may make the regulation inconsistent with the requirements of § 54.1-118 of the Code of Virginia, which provides that regulatory boards must accept military training, education, or experience that is substantially equivalent to the requirements in law or regulation for the issuance of an occupational license. This change would address any inconsistency. This change would be most beneficial to members of the Armed Forces who have prior experience performing barbering in the military and allow those who performed this occupation in the military greater opportunity to obtain a barber license in Virginia. The amendments to this section reduce barriers to entry into the cosmetology and barbering professions.
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20-9998	N/A	This section contains forms used to administer the regulation.	The forms section is updated to reflect changes to the regulation.
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