

Office of Regulatory Management
Economic Review Form

Agency name	Board for Barbers and Cosmetology
Virginia Administrative Code (VAC) Chapter citation(s)	18 VAC 20-20
VAC Chapter title(s)	Barbering and Cosmetology Regulations
Action title	General Review of Barbering and Cosmetology Regulations
Date this document prepared	February 4, 2025 (revised February 13, 2025, February 24, 2025, and March 17, 2025)
Regulatory Stage (including Issuance of Guidance Documents)	Proposed (Action 6339 / Stage 10647)

Cost Benefit Analysis

Complete Tables 1a and 1b for all regulatory actions. You do not need to complete Table 1c if the regulatory action is required by state statute or federal statute or regulation and leaves no discretion in its implementation.

Table 1a should provide analysis for the regulatory approach you are taking. Table 1b should provide analysis for the approach of leaving the current regulations intact (i.e., no further change is implemented). Table 1c should provide analysis for at least one alternative approach. You should not limit yourself to one alternative, however, and can add additional charts as needed.

Report both direct and indirect costs and benefits that can be monetized in Boxes 1 and 2. Report direct and indirect costs and benefits that cannot be monetized in Box 4. See the ORM Regulatory Economic Analysis Manual for additional guidance.

Table 1a: Costs and Benefits of the Proposed Changes (Primary Option)

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: <u>Lost Revenue to Barber Schools Due to Reduced Training Hours</u> • This action amends barber training hours from a minimum of 1,100 hours to a minimum of 750 hours, master barber training hours from 400 to 250, and dual barber/master training from 1,500 to 1,000. Barber schools are considered small businesses that may be affected by this change. Schools may have an administrative cost to submit new curricula and performances to the Board. ○ Under the amended regulation, schools would not be required to reduce the number of program hours from the current minimum of 1,100 hours, 400 hours, or 1,500 hours; however, some schools may choose to do so to attract more potential students. ○ The average total cost, from 2023-2024, to complete a barber program in Virginia was \$15,864¹ per student, this is the education required for entry into the profession. Assuming the average barber program is at least 1,100 hours, the current minimum regulatory requirement, a reduction of minimum hours to 750 could result in an average cost for tuition and fees of approximately \$10,815 per student. ▪ Cost per hour for a barber program: \$14.42 [15,864/1,100]. ▪ Proposed new minimum training hours for barber program: 750 ▪ Cost per hour x new minimum training hours: \$10,815. ▪ This could result in a loss of approximately \$5,049 in revenue per student, if a school elects to reduce the number of program hours to the minimum. ○ Based on the Board's licensing records, on average there are 102 individuals per year who are licensed by examination as barbers who completed a barber program. ○ It is estimated that there are approximately 102 individuals who are licensed by examination (the average from 2021-2024) attributed to an average of 66 active licensed barber schools per year (from 2021-2024). ○ If each licensed school were to reduce the program hours to the proposed 750-hour minimum, it is estimated the loss of revenue among all schools would be \$514,896.
--	---

¹ Data is not tracked, nor is readily available for the pricing of master barber or dual barber/master training.

	(102 individuals licensed through examination x \$5,049 loss in revenue per student). ○ It is possible that the reduction in the minimum number of required hours may result in an increase in the number of students enrolling in licensed barber programs based on the potential reduced program cost and the potential ability to receive licensure more quickly. Assuming a 10% increase in the number of examinees (113), schools could recoup \$118,965 in aggregate. ▪ Number of new examinees: 11 (113-102). ▪ New cost of training: \$10,815 ▪ Cost of training x number of new examinees: \$118,965. ○ Total cost of lost revenue to barber schools: \$395,931 (Lost revenue – offset due to increase in students.) ○ To the extent that funds would be kept by students instead of being paid to the schools, this amendment would effectively be a transfer payment, as the money will no longer go from the students to the schools. <u>Repeal of Instructor Training Course Pathway to Instructor Certification</u> • This amendment repeals the pathway allowing for individuals to take an “instructor training course” from Board-approved schools, which are considered small businesses. Licensees may still pass a course in teaching techniques at the post-secondary educational level or pass an instructor examination to acquire an instructor certificate. ○ There are currently 65 approved instructor classroom programs for cosmetologists, barbers, nail technicians, and wax technicians that would be affected by this change. None of these Board-approved schools offer just an instructor course and will most likely not cease operations. ○ The average total cost to receive instructor training in Virginia is \$5,657 per student. ○ From 2022-2024 there was an average of 49 individuals per year who were approved for an instructor certification through an instructor training program, rather than the other two pathways. ○ Cost of instructor training x number of individuals completing instructor training through a school: \$277,193 ○ This could result in a potential cost of \$277,193 to instructor programs as a collective per year.
--	--

	<u>Lost Revenue to DPOR Due to Reduced Instructor Certification Renewal Fees</u> • Further, this action allows a licensee who holds multiple licenses across the scope of barber, master barber, cosmetologist, nail, or wax technicians to obtain just one “instructor” license instead of one per specialty (ex: barber instructor, nail technician instructor, etc). • Under current regulatory requirements, once an instructor certificate is obtained, the agency treats it as a “license upgrade,” meaning that upon renewal, an instructor must only pay the instructor renewal fee and not for their first license as a barber, master barber, cosmetologist, wax, or nail technician. This action reduces the fee for instructor certificate renewal from \$150 to \$20, while the renewal fee for a barber, master barber, cosmetologist, wax, or nail technician remains at the current \$105. Given this reduction, a licensee will now have to renew both their underlying license (\$105) and their instructor certificate (\$20) for a total of \$125. Likewise an individual that reinstates an expired license would only have to pay \$250 (\$210 for reinstatement of the underlying license plus a \$40 reinstatement fee). • Reduced renewal and reinstatement fees for instructor certifications may be considered a transfer payment. • Lost revenue to DPOR from renewal and reinstatement fee reduction for instructors: \$32,950 ○ At the current price of instructor renewal, this will cost the agency \$25 in lost revenue per renewal ○ At the current price of instructor reinstatement, this will cost the agency \$50 ○ Average number of instructor renewals per year²: 1,168 ○ Average number of instructor reinstatements per year: 75 ○ Lost revenue for instructor renewals: \$29,200 (\$1,168 x 25). ○ Lost revenue for instructor reinstatements: \$3,750 (75 x \$50).³ Indirect Costs: There are no anticipated additional monetizable indirect costs associated with this regulatory change.
--	--

² This number reflects renewals and reinstatements for cosmetologist, nail technician, and wax technician instructor certifications. This number does not include renewals and reinstatements for barbers and master barbers, as this data is not readily available.

³ In the “Board for Barbers and Cosmetology Fee Adjustment” (Action 6677/ Stage 10636) the fees set for barber, master barber, cosmetologist, nail, and wax technician renewal are \$165 per license, while the fee for instructor renewal is \$185. Once these fees take effect, the reduction of a \$185 fee to \$20 will result in no cost to the agency. As both the \$165 and \$20 payments will be required, the licensee is still making a total payment of \$185; this would be the same charger under current regulatory requirements given the proposed fee change.

	Direct Benefits: <u>Savings to Barber Applicants Due to Reduced Training Hours</u> • An individual who completes barber training with the reduced training hours will receive a savings benefit of \$5,049. • The estimated number of individuals who will qualify for the barber examination is 113. • Total savings to barber applicants: \$570,537 per year (\$5,049 x 113). <u>Savings to Certified Instructors Due to Reduced Renewal and Reinstatement Fees</u> • Savings to certified instructors from renewal and reinstatement fee reduction for instructors: \$32,950 per year. • Reduced renewal and reinstatement fees for instructor certifications may be considered a transfer payment. Indirect Benefits: • With reduced training requirements for barbers, students can graduate from barber school sooner and enter the workforce. This reduction in required school hours will allow for graduates to earn an additional 350 hours' worth of income. ○ The median hourly wage in Virginia for barbers is \$18.05. ○ Median barber wage x additional hours: \$6,318. ○ Total additional income to barbers: \$713,934 (Additional income (\$6,318) x number of barber applicants (113)).	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$3,330,621 (over five years)	(b) \$ 6,214,404 (over five years)
(3) Net Monetized Benefit	\$2,883,784 (over five years)	
(4) Other Costs & Benefits (Non-Monetized)	Costs: • Individuals with training from outside the United States must provide a translated, authenticated degree verification that must be evaluated by an education evaluation service. According to International Education Evaluations, the course report verification fee is \$185. A candidate from outside the United States will need to pay this \$185 fee, along with a \$172 exam fee and a \$90 license fee, to obtain a barber, cosmetology, nail, or	

	waxing license in Virginia. The total cost for an international candidate is \$447 on average. In contrast, applicants who completed their training within the United States or its jurisdictions are required to pay \$262 to obtain a license. As this is a new provision, it is unknown how many international candidates may apply through this method. Benefits: • Under the proposed amendment, applicants who have earned a degree from an institution outside of the United States may qualify to meet training requirements if the training is substantially equivalent to Virginia training. This change opens the door for more individuals to enter the industry. • Under the proposed amendment, applicants who completed a training program that is not considered substantially equivalent to Virginia's may sit for the exam if they have three years of work experience in another state or jurisdiction. This change opens the door for more individuals to enter the industry. • Applicants and businesses with felony convictions over 10 years will no longer have to report the conviction. More individuals who may have been discouraged to apply based on criminal history may enter the workforce. • Licensees seeking to qualify for an instructor certificate will only need to disclose criminal convictions occurring since initial licensure. • Individuals, shops, and salons will experience a decrease in the administrative burden of having to complete an application if reinstated within 180 days of expiration. Further, during this 180-day timeframe, schools may reinstate without requiring an inspection. • The regulation is revised to provide better clarity and remove provisions that are overly burdensome and otherwise unnecessary to protect the public health, safety, and welfare.
(5) Information Sources	International Education Evaluations: https://myiee.org/ Schools with instructor programs fees: Avi Career Training Inc https://avicareertraining.com Sharpen Your Skillz Continuing Education https://www.sharpenyourskillz.com/course-descriptions/ Beyond Beauty Academy

	https://www.beyondbeautyacademy.com/admission Beauty School LLC https://thebeautyschoolva.com/tuition-and-fees Asher institute of Hampton https://aiofhampton.edu/about/student-catalog/ Paul Mitchell the school of Huntsville https://paulmitchell.edu/huntsville/programs/instructor-program Barber schooling cost: Barbering/Barber Vocational Program Tuition and Completion Time Comparison Between Virginia Colleges (2023-2024) Barber wage data: Virginia - May 2023 OEWS State Occupational Employment and Wage Estimates
--	---

Table 1b: Costs and Benefits under the Status Quo (No change to the regulation)

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: There are no new monetizable direct costs associated with maintaining the status quo. Indirect Costs: There are no new monetizable indirect costs associated with maintaining the status quo. Direct Benefits: There are no new monetizable direct benefits associated with maintaining the status quo. Indirect Benefits: There are no new monetizable indirect benefits associated with maintaining the status quo.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non-Monetized)	N/A	
(5) Information Sources	N/A	

Table 1c: Costs and Benefits under Alternative Approach(es)

(1) Direct & Indirect Costs & Benefits (Monetized)	Refer to Box #4	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	N/A	
(4) Other Costs & Benefits (Non-Monetized)	No alternative approaches were considered in the development of this action.	
(5) Information Sources	N/A	

Impact on Local Partners

Use this chart to describe impacts on local partners. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 2: Impact on Local Partners

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: There are no anticipated monetizable direct costs to local partners. Indirect Costs: There are no anticipated monetizable indirect costs to local partners. Direct Benefits: There are no anticipated monetizable direct benefits to local partners. Indirect Benefits: There are no anticipated monetizable indirect benefits to local partners.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0

(3) Other Costs & Benefits (Non-Monetized)	There are no anticipated non-monetizable costs or benefits to local partners.
(4) Assistance	N/A
(5) Information Sources	N/A

Impacts on Families

Use this chart to describe impacts on families. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 3: Impact on Families

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: There are no anticipated monetizable direct costs to families. Indirect Costs: There are no anticipated monetizable indirect costs to families. Direct Benefits: There are no anticipated monetizable direct benefits to families. Indirect Benefits: There are no anticipated monetizable indirect costs to families.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	There are no anticipated non-monetizable costs or benefits to families.	
(4) Information Sources	N/A	

Impacts on Small Businesses

Use this chart to describe impacts on small businesses. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 4: Impact on Small Businesses

(1) Direct & Indirect Costs & Benefits (Monetized)	Refer to Box #3	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	As Board-approved training schools are considered small businesses, the impact is reflected in Table 1a of this document.	
(4) Alternatives	N/A	
(5) Information Sources	N/A	

Changes to Number of Regulatory Requirements**Table 5: Regulatory Reduction**

For each individual action, please fill out the appropriate chart to reflect any change in regulatory requirements, costs, regulatory stringency, or the overall length of any guidance documents.

Change in Regulatory Requirements

VAC Section(s) Involved*	Authority of Change	Initial Count	Additions	Subtractions	Total Net Change in Requirements
20-20	(M/A):	1	0	0	0
	(D/A):	6	0	6	-6
	(M/R):	1	0	0	0
	(D/R):	15	6	9	-3
20-30	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	41	0	28	-28
20-40	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	4	2	4	-2
20-50	(M/A):	0	0	0	0
	(D/A):	3	0	3	-3
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
20-60	(M/A):	0	0	0	0
	(D/A):	2	0	1	-1
	(M/R):	0	0	0	0
	(D/R):	6	1	2	-1
20-70	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	2	0	2	-2
20-80	(M/A):	0	0	0	0
	(D/A):	2	0	0	0
	(M/R):	0	0	0	0
	(D/R):	11	1	2	-1
20-100	(M/A):	1	0	0	0
	(D/A):	5	0	5	-5
	(M/R):	0	0	0	0
	(D/R):	11	1	6	-5

20-110	(M/A):	0	0	0	0
	(D/A):	1	1	0	+1
	(M/R):	0	0	0	0
	(D/R):	6 ^a	5	5	0
20-120	(M/A):	1	0	0	0
	(D/A):	7	0	7	-7
	(M/R):	1	0	0	0
	(D/R):	26	4	8	-4
20-130	(M/A):	1	0	0	0
	(D/A):	8	0	7	-7
	(M/R):	1	0	0	0
	(D/R):	32	6	9	-3
20-140	(M/A):	0	0	0	0
	(D/A):	0	2	0	+2
	(M/R):	0	0	0	0
	(D/R):	3	0	0	0
20-150	(M/A):	0	0	0	0
	(D/A):	2	0	2	-2
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
20-180	(M/A):	0	0	0	0
	(D/A):	6	3	4	-1
	(M/R):	0	0	0	0
	(D/R):	11	7	7	0
20-200	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	18	6	2	+4
20-210	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	104 ^b	39	76	-37
20-220	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	44	20	18	+2
20-240	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	18	2	3	-1
	(M/A):	0	0	0	0

20-250	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	4	14	4	+10
20-270	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	1	0	0	0
	(D/R):	90	14	15	-1
20-280	(M/A):	1	0	0	0
	(D/A):	2	0	2	-2
	(M/R):	0	0	0	0
	(D/R):	18	0	1	-1
a: July 2023 Baseline Count should have 6 D/R for 18VAC41-20-110. b: July 2023 Baseline Count should have 104 D/R for 18VAC41-20-210.					Grand Total of Changes in Requirements: (M/A): 0 (D/A): -31 (M/R): 0 (D/R): -73

Key:

Please use the following coding if change is mandatory or discretionary and whether it affects externally regulated parties or only the agency itself:

(M/A): Mandatory requirements mandated by federal and/or state statute affecting the agency itself

(D/A): Discretionary requirements affecting agency itself

(M/R): Mandatory requirements mandated by federal and/or state statute affecting external parties, including other agencies

(D/R): Discretionary requirements affecting external parties, including other agencies

Cost Reductions or Increases (if applicable)

VAC Section(s) Involved*	Description of Regulatory Requirement	Initial Cost	New Cost	Overall Cost Savings/Increases
20-20	A barber school curriculum must be a minimum of 1,100 clock hours.	The current average tuition for a barber program is \$15,864 ⁴ per student.	The average tuition for a barber program is estimated to be \$10,815 per student.	The change is estimated to result in a savings of \$5,049 per student. A savings of about 32%. The cost savings apply to one D/R requirement in section -20; resulting in a

⁴ Data is not tracked, nor is readily available for the pricing of master barber or dual barber/master training

				reduction of .32 D/R.
20-20 20-30 20-200 20-210 20-220	The reduction of training requirements for a barber license is anticipated to result in \$1.3 million of reduced costs and increased earnings annually.	N/A	N/A	The change results in a 32% reduction of the burden of applicable D/R requirements for sections -20, -30, 200, -210, and 220. There are 84 applicable D/R requirements in these sections (revised July 2023 baseline.) This results in a reduction of 26.88 D/R requirements.
Total Change:				-27.2 D/R

Other Decreases or Increases in Regulatory Stringency (if applicable)

VAC Section(s) Involved*	Description of Regulatory Change	Overview of How It Reduces or Increases Regulatory Burden
20-20 20-100 20-120 20-130	The prohibition on providing a post office box address to the Board as an address of record is replaced with a provision that allows a post office box to be provided to the Board as a secondary address.	The change reduces the stringency of current requirements. The change will allow for notices and correspondence from the Board to be sent to a post office box instead of a physical address. The change reduces the stringency of the current requirement by 50%. The change applies to: • One D/R requirement in 18VAC41-20-20. • One D/R requirement in 18VAC41-20-100.

		• One D/R requirement in 18VAC41-20-120. • One D/R requirement in 18VAC41-20-130. This results in a total reduction of 2 D/R.
20-20 20-100 20-120 20-130	The “look back” period for disclosure of prior felony convictions is reduced. Applicants for licensure or certification, including responsible management for shops, salons, and schools must disclose all felony convictions within 10 years of the date of application. Currently, applicants must disclose felony convictions within 20 years of the date of application.	The change reduces the stringency of the current felony conviction disclosure requirements for individual licenses and certificates, and for shop, salon, and school licenses issued to firms. The change reduces the stringency of the current requirement by 50%. The change applies to: • One D/R requirement in 18VAC41-20-20. • One D/R requirement in 18VAC41-20-100. • Two D/R requirements in 18VAC41-20-120. • Two D/R requirements in 18VAC41-20-130. This results in a total reduction of 3 D/R.
20-20	Applicants for an individual license who received training outside of Virginia, including outside of the United States, that is not equivalent to Virginia training, may qualify for the license examination by providing documentation of three (3) years of work experience. Currently, such individuals must provide documentation of five (5) years	This change reduces the stringency of the current qualification standard by 40%. This change applies to one D/R requirement in the section; resulting in a reduction of .4 D/R.

	of work experience to qualify for the license examination.	
20-30	Applicants for licensure by endorsement may qualify for licensure based on having completed either training or an apprenticeship program in the profession in another state that is substantially equivalent to that required in Virginia. Currently, such individuals can only qualify on the basis of completing training that is substantially equivalent.	This change reduces the stringency of the current qualification standard by 50%. This change applies to one D/R requirement in the section; resulting in a reduction of .5 D/R.
20-30	Applicants for licensure by endorsement who have not completed a training or apprenticeship program that is equivalent to Virginia training may qualify for licensure by providing documentation of three (3) years of experience to substitute for required training. Currently, such individuals must have a least five (5) years of experience.	This change reduces the stringency of the current qualification standard by 40%. This change applies to one D/R requirement in the section; resulting in a reduction of .4 D/R.
20-80	Experience qualifications for chief examiners for license examinations are reduced as follows: • A reduction from five (5) years to three (3) years in the number of years of active experience in the profession. • A reduction from three (3) years to one (1) year of active experience as an examiner.	The change reduces the stringency of current experience requirements for chief examiners. The qualification for years of active experience in the profession is reduced by 40%. This change applies to one D/R requirement in the section; resulting in a reduction of .4 D/R. The qualification for years of active experience as an examiner is reduced by 66%. This change applies to one D/R

		requirement in the section; resulting in a reduction of .66 D/R.
20-100	Training qualifications for an instructor certificate are revised to remove completion of a Board-approved instructor training course as a pathway for qualification. Currently, an individual may complete either: • Pass a course in teaching techniques at the post-secondary education level. • Complete a Board-approved instructor training course under the supervision of licensed individual in a licensed school. • Pass an instructor examination in the profession administered by the Board.	The change increases the restrictiveness of the current qualification requirement by 33%. The change applies to one D/R requirement in the section; resulting in a reduction of .33 D/R.
20-120 20-130	The requirement for firm licensees (shops, salons, or schools) to return a license to the Board whenever the legal business entity holding the license changes (e.g. dissolution of a corporation) is revised to a less restrictive requirement for the firm to notify the Board of the change and destroy the license.	As a result of the change, firm licensees will no longer have to return a license (i.e. mail or deliver in person) to the Board when its legal business entity changes, and can simply notify the Board and destroy the license. Licensees will still need to obtain a new license for the new business entity in order to engage in the regulated activity. This change reduces the stringency of the current requirement by 50%.

		This change applies to one D/R requirement in section -120 and one D/R requirement in section -130; resulting in a reduction of 1 D/R.
20-180	The provisions for re-licensure of individuals with expired licenses are revised to allow an individual who has been licensed for a minimum of three (3) years to submit a new application and pass the license examination if the individual fails to reinstate a license after it has been expired for two (2) years. Currently, only individuals who had initially qualified for licensure under a grandfathering provision (i.e. exemption from examination or training requirement) can regain licensure if they have five (5) years of licensed experience and pass the license examination.	The change allows all individuals with expired licenses who have been licensed for at least three years to become licensed again without the need to take required training. This change reduces the stringency of re-licensure requirements by 50%. This change applies to one D/R requirement in the section; resulting in a reduction of .5 D/R.
20-180	The provisions in the section regarding reinstatement of school licenses are revised to provide that a school with an expired license will be required to submit a reinstatement application if the license is expired for more than 180 days. Currently, a school with an expired license for more than 30 days must submit a reinstatement application.	The change allows schools with a license that is expired for more than 30 days, but less than 180 days, to only pay a reinstatement fee in order for the license to be reinstated. This change reduces the stringency of the current required by 83%. This change applies to one D/R requirement in the section; resulting in a reduction of .83 D/R.

20-200	The minimum number of hours for barbering training programs are reduced as follows: - Curriculum for a barber program is reduced from 1,100 clock hours to 750 clock hours. - Curriculum for a master barber program is reduced from 400 clock hours to 250 clock hours. - Curriculum for dual barber/master barber program is reduced from 1,500 clock hours to 1,000 clock hours.	The change reduces the number of required training hours for individuals to qualify for examination for a barber or master barber license. The change reduces the stringency of the current barber training requirement by 32%. This change applies to one D/R requirement in 18VAC41-20-200.5.a.; resulting in a reduction of .32 D/R. The change reduces the stringency of the current master barber training requirement by 38%. The change applies to one D/R requirement in 18VAC41-20-200.5.b.; resulting in a reduction of .38 D/R. The change reduces the stringency of the current dual barber/master barber training requirement by 33%. The change applies to one D/R requirement in 18VAC41-20-200.5.c.; resulting in a reduction of .33 D/R. This results in a total reduction of 1.03 D/R.
20-220	The minimum number of required practical performances for barbering training programs are reduced as follows: Performances for a barber program are reduced from 370 performances to 332 performances.	The change reduces the number of required practical performances for individuals to qualify for examination for a barber or master barber license. The change reduces the stringency of the current barber performances requirement by 10%. This change applies to five D/R requirements in

	• Performances for a master barber program are reduced from 120 performances to 100 performances. • Performances for dual barber/master barber program are reduced from 490 performances to 432 performances.	18VAC41-20-220.B; resulting in a reduction of .5 D/R. The change reduces the stringency of the current master barber performances requirement by 17%. The change applies to five D/R requirements in 18VAC41-20-220.C.; resulting in a reduction of .85 D/R. The change reduces the stringency of the current dual barber/master barber performances requirement by 12%. The change applies to ten D/R requirements in 18VAC41-20-220.D.; resulting in a reduction of 1.2 D/R. This results in a total reduction of 2.55 D/R.
20-220	The minimum number of required practical performances for a nail care training program is reduced from 275 performances to 255 performances.	The change reduces the number of required practical performances for individuals to qualify for examination for a nail technician license. The change reduces the stringency of the current nail care performances requirement by 7%. This change applies to five D/R requirements in 18VAC41-20-220.F.; resulting in a reduction of .35 D/R.
20-220	The minimum number of required practical performances for a waxing training program is reduced from 36 performances to 30 performances.	The change reduces the number of required practical performances for individuals to qualify for examination for a wax technician license. The change reduces the stringency of the current

		waxing performances requirement by 17%. This change applies to eight D/R requirements in 18VAC41-20-220.G.; resulting in a reduction of 1.36 D/R.
Total Change:		-15.31 D/R

Length of Guidance Documents (only applicable if guidance document is being revised)

Title of Guidance Document	Original Word Count	New Word Count	Net Change in Word Count
N/A	N/A	N/A	N/A

*If the agency is modifying a guidance document that has regulatory requirements, it should report any change in requirements in the appropriate chart(s).