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Regulating Glamour: A Quantitative Analysis of the Health and Safety Training of Appearance Professionals, 54 UIC J. Marshall L. Rev. 123 (2021)

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REGULATING GLAMOUR: A QUANTITATIVE ANALYSIS OF THE HEALTH AND SAFETY TRAINING OF APPEARANCE PROFESSIONALS

DANIEL GREENBERG*

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I. INTRODUCTION

Personal appearance professionals in the United States — such as barbers, cosmetologists, and manicurists — must typically be licensed. These licensing requirements vary from state to state, and they are often burdensome. For instance, a cosmetologist must, on average, undergo nearly 1,500 hours of training, pay \$17,000 in tuition-related costs, and pass two exams in order to get licensed.¹

The rationale for the licensing of personal appearance professionals (and for the training their licensing requires) usually rests on concerns about health and safety — more precisely, the health and safety of consumers or providers of appearance services. This invites a question: how much of the curriculum required for licensing teaches prospective personal appearance practitioners about health and safety? This Article answers that question by analyzing the licensing curricula required by legislation and regulation of 38 U.S. jurisdictions for barbers, cosmetologists, and manicurists. It finds that, on average, roughly 25% of the barber's and cosmetologist's curriculum in these jurisdictions teaches prospective practitioners about health and safety; for manicurists, that figure is roughly 40%. More precisely:

Barbers on average must undergo 1,348 hours of training; the average percentage of health and safety training in their curriculum is 25.62%.²

Cosmetologists on average must undergo 1,491 hours of training; the average percentage of health and safety training in their curriculum is 25.45%.³

Manicurists on average must undergo 366 hours of training; the average percentage of health and safety training in their curriculum is 39.79%.⁴

These findings invite another question: what is the public benefit of the remaining portion of the curriculum — that is, the larger portion of the curriculum — if that remainder is unrelated to health or safety? If the only public benefit of these licensing requirements is public health and safety, and nothing else, then it necessarily follows that the vast majority of training that state licensing schemes require has no public purpose or value. Notably, a reduction in the training requirements that are unrelated to health and safety would presumably benefit the public by allowing

1. DICK CARPENTER ET AL., LICENSE TO WORK: A NATIONAL STUDY OF BURDENS FROM OCCUPATIONAL LICENSING 154 (2017); Meredith Kolodner and Sarah Butrymowicz, *For-Profit Cosmetology Schools Can Entangle Students in Debt That \$10-an-Hour Jobs Barely Dent*, N.Y. TIMES (Dec. 30, 2018); see *infra* Table 1(B).

2. See *infra* Table 1(A).

3. See *infra* Table 1(B).

4. See *infra* Table 1(C).

an increased number of qualified personal appearance professionals to enter the labor market.

This Article summarizes the requirements for personal appearance training across the United States, provides a way to estimate and measure what portion of a personal appearance curriculum required for licensing is related to health and safety, discusses the results and implications of this measurement, and argues that other proposed justifications for such licensing — those that do not rest on health and safety concerns — are weak or empty. These findings imply that streamlining the licensing requirements for these professionals in order to focus on health and safety training will benefit both consumers and aspiring personal appearance professionals.

II. THE COSTS AND BENEFITS OF LICENSING GENERALLY

Why are personal appearance professionals ⁵ licensed? Perhaps this question is easier to answer after discussing a broader question first — namely, why are professions licensed?

Professional licensing is often justified as a solution to the problem of asymmetric information — or, to put it more bluntly, the lack of knowledge of the consumer. Problems of asymmetric information arise when one party in a transaction has access to more information than another.⁶ In cases where service providers have more information about the quality of the services they provide or the nature of the training they have received, consumers may not be able to determine the quality of services that providers offer or the risks that those services present to the public's health and/or safety. For instance, consumers typically lack the technical knowledge that doctors have, and therefore consumers cannot evaluate doctors' expertise; if governments did not license doctors, some consumers might not be able to figure out whether a particular provider is qualified to practice medicine. Licensing requires doctors to meet certain minimum qualifications (for instance,

5. This Article uses the terms “personal appearance professionals” or “appearance professionals” to refer to what the Bureau of Labor Statistics’ Standard Occupational Classification system calls “personal appearance workers.” See *2018 Standard Occupational Classification System*, U.S. BUREAU OF LABOR STATISTICS, www.bls.gov/soc/2018/major_groups.htm [perma.cc/55L4-S8M9] (referring to section 39-500). Similarly, it uses terms like “appearance services” to describe the services that these professionals offer, as well as “appearance training” or “appearance curricula” to describe the elements of the profession that these professionals must study as a condition of licensing. Furthermore, this Article does not distinguish between personal appearance education and personal appearance training; the phrase “education and/or training” could be substituted for the word “training” throughout this Article with no change in meaning.

6. George A. Akerlof, *The Market for “Lemons”: Quality Uncertainty and the Market Mechanism*, 84 Q. J. ECON. 488 (1970).

acquiring a medical school degree, passing medical board exams, and completing a residency).

A medical license serves as a heuristic for consumers who want assurance that the doctor they choose is a competent practitioner, and many consumers who lack the capacity to evaluate medical skill want or need that shortcut. Because consumers cannot be expected to analyze a doctor's medical school transcript, investigate whether the provider's office is appropriately sanitary, or exercise sufficient independent expertise to evaluate whether the doctor in question is providing appropriate medical services, licensing is justified. Licensing, therefore, discourages charlatans from inflicting subpar or dangerous services on consumers lacking technical knowledge; relatedly, enforcement of various aspects of licensing regimes can be predicted to force low-quality provision of services out of the marketplace.⁷ A related justification of licensing is that it can be used to push the skills of licensees up or otherwise encourage better quality of services (for instance, a continuing education requirement is often a feature of licensing).

Critics of licensing as it actually exists in the United States today may find the above account unsatisfactory; they might argue, for instance, that private certification will address information asymmetries as well as or better than a mandatory licensing regime does. (Notably, medical doctors do not generally have licenses in medical specialties; rather, they have certifications.) Likewise, such critics might argue that other social institutions are likely to do a better job of protecting consumers in such cases — for instance, hospitals that selectively grant privileges to medical professionals, the civil justice system generally, and even the self-interest of doctors who want to protect their own reputations. These critics might also point out that licensing historically has come about through lobbying from provider groups, and that it often seems to have the effect of protecting providers from competition.⁸

7. See, e.g., *id.* at 488; Hayne E. Leland, *Minimum Quality Standards and Licensing in Markets with Asymmetric Information*, in OCCUPATIONAL LICENSURE AND REGULATION 265, 269-78 (Simon Rottenberg ed., 1980), www.aei.org/wp-content/uploads/2018/01/Occupational-Licensure-and-Regulation.pdf?x91208 [<https://perma.cc/C6VF-YQ7T>]; *Semler v. Or. State Bd. of Dental Exam'rs*, 294 U.S. 608, 612-13 (1935). Very generally, state-level policymakers exercise their authority to protect the health, safety, morals, and general welfare of their constituents by use of what is often called the “police power” of the states. For a comprehensive account of this common-law power, see generally Santiago Legarre, *The Historical Background of the Police Power*, 9 U. PA. J. CONST. L. 745 (2007).

8. See, e.g., MILTON FRIEDMAN, CAPITALISM AND FREEDOM 137-60 (2002); Simon Rottenberg, *Introduction*, in OCCUPATIONAL LICENSURE AND REGULATION, *supra* note 7, at 4, 4-5. As Adam Smith wrote, “The interest of the dealers . . . in any particular branch of trade or manufactures, is always in some respects different from, and even opposite to, that of the public.” ADAM SMITH, AN INQUIRY INTO THE NATURE AND CAUSES OF THE WEALTH OF NATIONS 287 (Campbell & Skinner eds., 1981). Indeed, Smith suggested that any proposal

Other arguments, from those who contend that the scope of licensing is overbroad, focus on the way licensing makes it significantly harder or more costly to pursue a profession or trade. In some cases, acquiring an occupational license requires years of education and/or training and tens of thousands of dollars; each licensee has overcome a set of barriers to entry that locks out other capable providers of services from the marketplace. The hurdles of licensing sometimes create unemployment and underemployment, dampen competition, and prevent consumers and service providers from reaching mutually satisfactory agreements.⁹ A broad survey of empirical research suggests that licensing often has no positive effect on quality of goods as they relate to public health and safety.¹⁰ The same point could be made about the efficacy of continuing education requirements — it is difficult to find evidence that such requirements serve their ostensible purpose. Indeed, the absence of occupational licensing in what are arguably some of the riskiest spheres of professional interaction suggests a deep intuition that licensing is not well-tailored to address notable problems of safety. For instance, restaurant patrons benefit from a system of regular inspections, and there is little or no political impetus for the licensing of cooks, waiters, and table bussers. Similarly, no state licenses automobile mechanics, despite the easily foreseeable connection between an unskilled car repairman and a grave automotive mishap.

A comprehensive verdict on the costs and benefits of licensing is beyond the scope of this Article; however, the brief summary above provides some background for a discussion of the costs and benefits of the licensing of personal appearance professionals — such as barbers, cosmetologists, and manicurists — in the United States today.¹¹ Justifications for licensing of appearance professionals are typically based on concerns about the health and safety of the public — primarily, the consumers of appearance

before a policymaking body that is brought by a self-interested lobby “ought never to be adopted till after having been long and carefully examined . . . with the most suspicious attention.” *Id.* at 288. Smith’s skepticism is shared by many successors: researchers have discovered that, even if licensing raises compensation for licensed professionals, in many instances this increased compensation is not coupled with improvements in the value or the quality of services that those professionals deliver. Patrick A. McLaughlin, Jerry Ellig & Dima Yazji Shamoun, *Regulatory Reform in Florida: An Opportunity for Greater Competitiveness and Economic Efficiency*, 13 FLA. ST. U. BUS. REV. 95 (2014); *see also id.* (Table 3).

9. *See generally* CARPENTER ET AL., *supra* note 1.

10. McLaughlin, Ellig & Shamoun, *supra* note 8, at 8-12.

11. The most recent (2018) labor force statistics from the Current Population Survey estimate the number of U.S. personal appearance professionals to be approximately 1.4 million. *See Household Data: Annual Averages: 11. Employed persons by detailed occupation, sex, race, and Hispanic or Latino ethnicity*, U.S. BUREAU LAB. STAT., www.bls.gov/cps/cpsaat11.htm [perma.cc/N2SU-FP6H] (last updated Jan. 22, 2021).

services.¹² For instance, an appearance professional who fails to practice conventional health and safety measures might spread infections or expose customers to dangerous chemical reactions. The health and safety of the public is the primary benefit that is typically offered to demonstrate the public interest in the licensing of appearance professionals. For the purposes of analysis, this Article takes that public health and safety benefit as axiomatic. Perhaps there are other public benefits to the licensing of appearance professionals outside of the realm of health and safety, but the nature of those other benefits is not obvious. (Other proposed benefits — namely, whether licensing is effective in providing service quality and in providing certification — are discussed in Section VII, below.)

Concern about over extensive licensing is bipartisan. The Obama Administration determined that “most research does not find that licensing improves quality or public health and safety.”¹³ A Trump Administration executive order recommended that state, territorial, and tribal governments adopt only those occupational regulations “least restrictive to competition sufficient to protect consumers from significant and demonstrable harm to their health and safety.”¹⁴ The website of Joe Biden’s presidential campaign noted that “in many occupations, licensing does nothing but thwart economic opportunity.”¹⁵ However, advocacy of the contrary view often originates from licensees themselves or their organized representatives.¹⁶ As discussed below, this Article finds generally that there are large portions of appearance training — that are required before a license to practice the relevant occupation may be issued — that appear to have no relation to health and safety concerns. This suggests that the required training for appearance professionals can appropriately be streamlined — that is, it can be significantly reduced without decreasing its public benefit. That perspective animates this Article.

12. “Professional licensing in the beauty industry ensures the quality and safety of workers and ultimately protects consumers from unqualified, unsafe workers.” Nam Pham & Anil Sarda, *The Value of Cosmetology Licensing to the Health, Safety, and Economy of America*, NDP ANALYTICS (Feb. 2015), ndpanalytics.com/wp-content/uploads/Report-21.pdf [perma.cc/TBD8-QXAN] The Beauty Industry Working Group financially supported the NDP Analytics report.

13. U.S. Dep’t of the Treasury, Council of Econ. Advisers & U.S. Dep’t of Labor, *Occupational Licensing: A Framework For Policymakers* (July 2015), obamawhitehouse.archives.gov/sites/default/files/docs/licensing_report_final_nonembargo.pdf [perma.cc/Y9TE-2483].

14. Exec. Order No. 13966, 85 Fed. Reg. 81777 (Dec. 14, 2020).

15. *The Biden Plan for Strengthening Worker Organizing, Collective Bargaining, and Unions*, Biden-Harris, www.joebiden.com/empowerworkers/ [perma.cc/XV4Y-Q45B].

16. See also *supra* note 8 and accompanying text. See generally MORRIS M. KLEINER, LICENSING OCCUPATIONS: ENSURING QUALITY OR RESTRICTING COMPETITION? 17-42 (2006).

III. IMPLICATIONS OF THE NATURE AND SCOPE OF THE LICENSING OF APPEARANCE PROFESSIONALS

Licensing requirements in the U.S. for appearance services are nearly universal: if you want to be paid for providing appearance services, you generally must be licensed. Historically, a fundamental rationale for licensing has been the protection of the health and/or safety of the public. Notably, however, some appearance services, whether performed well or poorly, present no genuine risk to the health or safety of the public. Compare this to the services of a medical professional: one can make the case that as a general matter just about any medical procedure performed by an incompetent practitioner can endanger the health and safety of a patient, sometimes in an irreparable way. This is untrue for services from appearance professionals: a barber or cosmetologist who provides the customer with an unattractive haircut presents no risk to public health and safety. The justification of licensing that is based on information asymmetry is stronger for the provision of medical services than for the provision of haircuts. It is often difficult for a consumer who lacks medical training and education to evaluate the desirability and quality of medical services, but there is no comparable knowledge barrier that prevents a consumer from evaluating the desirability and quality of a haircut.

There is no impact on public health and safety from the repeated provision of unattractive haircuts; however, the practitioner of such haircuts is likely to face a lack of repeat business, as well as bad word of mouth or similar reputational damage. The modern phenomenon of peer-to-peer online interactions — which incorporate and proliferate multitudes of ratings and reactions from individual consumers — accelerates this trend. Assuming that the justification for the licensing of appearance professionals is the protection of health and safety, that justification is weakened when (or to the extent that) the appearance professional provides services that have no effect on health and safety. Relatedly, given the same assumption, the justification for the training that is required for licensing is weakened when (or to the extent that) appearance training is unrelated to health and safety concerns. To put it another way, given this assumption, licensing requirements for appearance professionals that are unrelated to health and safety are relatively hard to justify.

These theoretical conclusions suggest that it is appropriate to examine what portion of the requirements for the licensing of appearance professionals (and, in particular, what portion of the required appearance training curricula) protects the health and safety of the public. If that portion is relatively small, this invites the question of whether the rest of that curriculum as a requirement

for and precursor to licensing is socially wasteful or unnecessary.

IV. THE NATURE AND SCOPE OF APPEARANCE TRAINING: COMPARISON ACROSS JURISDICTIONS

After researching the training requirements for three classes of appearance professionals in fifty-one U.S. jurisdictions (fifty states and the District of Columbia), this Article finds that the portion of required training for barbers and cosmetologists that protects the health and safety of the public is roughly 25%, while the corresponding figure for manicurists is roughly 40%.¹⁷ This means that only a small portion of the training that these appearance professionals must undergo, as measured in hours, is relevant to health and safety. This Article provides the data, estimates, and calculations that these findings rest on in its appendices; those calculations are explained immediately below.

The foundational methodology of this Article is as follows. The training requirements for barbers, cosmetologists, and manicurists¹⁸ in fifty-one jurisdictions were compiled. Each jurisdiction's hourly requirements, which are more often than not further specified in greater detail by hourly requirements for what one might call subfields (for instance, appearance crafts or skills like hairstyling, manicuring, and shaving) were derived and recorded. The proportion of each subfield's hourly requirements that is relevant to health and safety (including the health and safety of the consumer, the provider, and the public) was estimated, thereby producing a health and safety rating for each subfield in the form of a percentage; for each subfield, that percentage was then multiplied by the required hours for that subfield, resulting in a product of health and safety hours for each subfield. For each jurisdiction that either (a) specified hourly training in various subfields or (b) specified other requirements that could be converted into hourly subfield requirements, all of the resultant subfield products were then summed together. There are thirty-eight such

17. See *infra* Table 1(A); Table 1(B); Table 1(C). This figure is an *estimate* that is based on real-world data, such as the constraints that state legislation and regulation impose. This Article's method can be used to estimate some given portion of a curriculum; the resulting estimate could then be used to guide the streamlining of that curriculum. However, this Article does not argue that its method is the *best* or the *only* method of producing such an estimate, but only that it is *a* method. Other methods are discussed briefly in § 9 *infra*.

18. These three professional labels are functional categorizations that arise from each jurisdiction's professional training. Some jurisdictions use different local terms for some occupations; for the purposes of this Article's analysis, each of these three occupations are understood as occupying a separate, unique functional category, regardless of what label may sometimes be used for any of them. So, for instance, this Article refers to professionals whose primary training is in the care and beautification of the human nail as "manicurists," although some jurisdictions call them "nail technicians."

jurisdictions analyzed in this Article; they are referred to here as qualifying jurisdictions, and they constitute nearly three-quarters of the fifty-one specified U.S. jurisdictions.¹⁹ (As discussed below, the remaining thirteen jurisdictions — the ones that are not qualifying jurisdictions — do not specify training requirements to the degree necessary to estimate, with any precision, the portion of health and safety training required.) The sum of each qualifying jurisdiction's set of health and safety hours provides an overall hourly figure for a given licensee's health and safety training in that jurisdiction. This method allows for the calculation of three interjurisdictional averages across the qualifying jurisdictions — that is, one average for each one of the three professions.²⁰ The hourly training requirements for each of the three professions across all jurisdictions, as well as the hourly portions of health and safety training for each of the three professions across all qualifying jurisdictions, are represented graphically by six illustrations in this Article (Figures 1-6). The relevant data and calculations are provided in Appendix C below. An overall health and safety rating for each profession in each qualifying jurisdiction is provided in Appendix C's Tables 1A, 1B, and 1C; the granular calculations that create these overall health and safety ratings are provided in Appendix C's Table 2.

Each of the fifty-one jurisdictions this Article examine licenses appearance professionals, and each jurisdiction has differing rules and standards for training; a plain-language description of each jurisdiction's requirements is provided in Appendix B below. As alluded to above, in much the same way that states require public school students to undergo some amount of education in (for instance) literacy, history, math, and science, many jurisdictions that license (for instance) cosmetologists require them to be trained in such subfields as (for instance) haircoloring, hairstyling, manicuring, and shampooing, with a set minimum of clock hours devoted to each. However, only thirty-eight of these fifty-one jurisdictions can be understood as requiring a detailed curricular breakdown of hours required for each cosmetology subfield. Some of the remaining thirteen jurisdictions provide an extensive list of required cosmetology subfields without providing guidance about how many hours should be devoted to each field (for instance, Arizona); other jurisdictions simply specify a flat number of hours

19. Notably, there are thirty-eight qualifying jurisdictions for each of the three professions examined in this Article, but the composition of the sets of qualifying jurisdictions varies by profession. So, for instance, Arizona is one of the thirty-eight qualifying jurisdictions for barbers, but not for cosmetologists or manicurists. Tables 1A, 1B, and 1C *infra* list the qualifying jurisdictions, one for each profession examined in this Article.

20. As explained in more detail in the paragraph immediately below, a minority of jurisdictions do not provide sufficient direction in their curricular requirements to perform this kind of analysis.

for cosmetology training without any specified subdivisions of hours for specific subfields (for instance, Delaware). The law, rules, and regulations in these remaining thirteen jurisdictions provide little or no guidance about what portion of their cosmetology training might focus on health and safety concerns. In these thirteen jurisdictions, there is either no law or regulation that determines what subfields are required in that particular jurisdiction's curriculum, or there is no explanation of the relative proportion of the curriculum that training in any given subfield should occupy. The relatively scant curricular requirements in these thirteen jurisdictions are therefore insufficient to calculate hourly health and safety figures with any precision; therefore, this Article confines its analysis of cosmetology curricula to the thirty-eight jurisdictions that provide either a specific, clock-hour curricular subfield breakdown or a set of requirements that could reasonably be converted to a set of clock-hour requirements. This Article carries out a similar fifty-one-jurisdictional analysis for barbers and manicurists, finding that there are thirty-eight qualifying jurisdictions for barbers and manicurists as well. Some minor assumptions and adjustments were necessary in order to produce clock-hour curricular descriptions or conversions that are comparable across jurisdictions; those assumptions are explained in Appendix A.

However, another set of assumptions is necessary in order to estimate what percentage of a subfield's hours of required training is related to health and safety. This second set of assumptions is discussed below in Section V. Notably, once such estimates are produced, determining the portion of health and safety training in each subfield or in each jurisdiction requires no additional qualitative judgments, but only mathematical calculations.

V. THE NATURE AND SCOPE OF APPEARANCE TRAINING: CONTENT ANALYSIS

In order to determine what portion of appearance training is devoted to health and safety, it is helpful to examine previous research on this topic. In 2016, a report produced with the help of the Beauty Industry Working Group ²¹ (BIWG) explored (among other matters) the portions of cosmetology training devoted to various topics.²² The curricula for ten of the eleven states that it

21. More precisely, the "Acknowledgments" section of the report states that it "represents a collaborative effort" between the American Institutes for Research and the Beauty Industry Working Group. The Beauty Industry Working Group is an assembly of trade groups in the professional beauty industry.

22. Kaila M. Simpson et al., *Examination of Cosmetology Licensing Issues*, AM. INSTS. FOR RES. (Aug. 30, 2016), at 10-14, www.fbic.org/wp-content/uploads/2018/11/PBA_Examination_of_Cosmetology_Licensing_Issues

surveyed contained segments that were expressly and exclusively devoted to safety and sanitation. On average, those ten states devoted 166.9 hours each to the study of safety and sanitation in their cosmetology curriculum; given that the average curriculum of these ten states consisted of 1,660 training hours, this shows that the average amount of training expressly assigned to safety and sanitation is almost exactly 10%.²³ However, if the goal is to determine what portion of cosmetology training is related to health and safety concerns, the 10% figure appears to be an underestimate. As the report explained:

“For this analysis, it should be noted that the specificity of each content outline severely limits the accuracy of these estimates. For example, safety and sanitation may be covered when each procedure is taught and practiced (e.g., under each service category), however, if it was not specifically mentioned in the outline it was not coded.”²⁴

In other words, health and safety training in a cosmetology curriculum is typically not confined just to the segments of the curriculum that are expressly labeled as focusing on health and safety. For instance, consider the following two instances of the way that health and safety instruction might be included in the subfields of a cosmetology curriculum. When cosmetology students are taught how to give haircuts, they are typically taught how to do so safely (for instance, you must clean and disinfect your instruments, or else you may spread disease); when cosmetology students are taught how to chemically relax hair, they are typically taught how to do so safely (for instance, you must not apply certain kinds of chemical relaxers to the hair if it has previously been colored with metallic salts, or else you may cause dangerous chemical reactions and hair breakage). Notably, even though these two instances of cosmetology training are relevant to health and safety, both of them would likely be covered in the course of training cosmetology students about some particular subfield, rather than in a curricular segment that is devoted to safety or sanitation generally.

These two instances provide an instructive contrast. This Article relies on the leading set of personal appearance textbooks: *Milady Standard Cosmetology*, 13th Edition;²⁵ *Milady Standard Barbering*, 6th Edition;²⁶ and *Milady Standard Nail Technology*, 7th Edition.²⁷ The *Milady* textbooks have captured roughly 75% of the education market for prospective appearance professionals in the United States.²⁸ This Article’s calculations rely on a survey of each

_2016_0912.pdf [perma.cc/5FDN-PRMK].

23. *Id.* at 12.

24. *Id.*

25. *MILADY STANDARD COSMETOLOGY* (13th ed. 2016).

26. *MILADY STANDARD BARBERING* (6th ed. 2017).

27. *MILADY STANDARD NAIL TECHNOLOGY* (7th ed. 2015).

28. The 75% estimate is based on an email from Mary Y. Irizarry Reddy (Government Affairs Director, Professional Beauty Association), January 2,

relevant chapter of these three textbooks to find health and safety rules, practices, and concerns: it is probably uncontroversial to say that the health and safety rules and concerns that the textbooks describe for haircutting are sparse, brief, often intuitive, and easy to remember.²⁹ However, this probably is not true for the health and safety concerns that the textbooks describe for chemical hair relaxers, which are relatively extensive and abstruse (and, in a few instances, a little alarming).³⁰ This highlights what perhaps is obvious: the curricula for different subfields can be expected to contain different amounts or proportions of instruction that are relevant to health and safety.

How does one determine what portion of training in some particular subfield is related to health and safety? This Article's methodology includes a content analysis of the latest edition of the Milady textbooks so as to derive a health and safety rating for each subfield.³¹ That analysis was performed by the author, who in each

2018, and phone calls and emails from Sandra Bruce (Vice President and General Manager, Milady), August 22, 2018, and July 19, 2019. Ms. Reddy provided an estimate, based on her conversations with experts affiliated with Milady, of "about 75% of the market share." Ms. Bruce suggested that the 75% figure is likely a low estimate, based on public information she provided about the market penetration of Milady's competitors.

29. This point is discussed in greater detail in Section VI *infra*.

30. Misuse of chemical hair relaxers may have unusual or surprising consequences that are not intuitive; for instance, such misuse may cause hair to emit smoke, or even melt. See, e.g., MILADY STANDARD COSMETOLOGY, *supra* note 25, at 618.

31. Of course, the aspiring professional probably cannot learn everything that he or she needs to know simply by memorizing propositions from textbooks: instead, the textbook's theoretical information needs to be practically applied. This is presumably why many professional curricula contain both theoretical and practical instruction; for instance, the typical cosmetology student might be required both to receive lectures about what makes for an attractive haircut and then give practice haircuts. Many theorists have elaborated on the implications of the distinction between *knowing how* to perform some task as a practical matter and *knowing that* some set of set of abstract propositions is true or false. See, for example, Nicholas Nassim Taleb's discussion of Switzerland's economic success, in which he claims: "[I]t is perhaps the most successful country in history, yet it has traditionally had a very low level of university education compared to the rest of the rich nations. Its system, even in banking during my days, was based on apprenticeship models, nearly vocational rather than the theoretical ones. In other words, on *techne* (crafts and know-how), not *episteme* (book knowledge, know what)." TALEB, ANTIFRAGILE: THINGS THAT GAIN FROM DISORDER 90 (2012). Nonetheless, a good textbook will presumably cover, to the extent possible, both knowing how and knowing what. Although one could argue that a significant degree of health and safety training is not well-measured by content analysis, given that such training sometimes takes place while performing appearance services rather than by learning abstract propositions, that argument would have some eyebrow-raising implications for the training of appearance professionals. For instance, cosmetology educators would presumably affirm that all students at their schools receive sufficient training to perform any particular procedure safely before those students are ever asked to perform that same procedure on

case measured the portion of the text that pertained to health and safety. (The assumption here is that the relevant Milady text about some given subfield is a reasonably complete account of the formal and theoretical aspects that students need to learn about that subfield. Perhaps a critic of this assumption might argue that there is no significant relationship between the textbooks' content and what prospective appearance professionals must learn, but that critic would likely find it difficult to explain why so many professional schools assign and require a textbook.) This measurement typically resulted in a ratio: for instance, if a subfield was entirely described in a particular chapter or subchapter in one of the Milady textbooks, a figure based on the length of the health and safety related concerns and instructions in that text was then divided by another figure based on the length of the subfield's entire

a human volunteer; such an affirmation would be in some tension with the theory that students must perform cosmetic services on people in order to learn about health and safety. In any event, an exclusive focus on practical training in this Article would be misguided, in that it would run the risk of systematically overstating the health and safety training that aspiring appearance professionals receive: there is anecdotal evidence that some of the requirements that some cosmetology students must fulfill, with respect to providing cosmetology services to the public, are satisfied whether or not a member of the public ever appears at the workplace to receive those services. In some states, in the event that no member of the public enters the workplace to receive cosmetology services, the training/education requirement can apparently be satisfied if the cosmetology student performs no services and does nothing but show up at the workplace. The health and safety portion of these education/training hours would presumably be zero. See Kolodner & Butrymowicz, *supra* note 1. ("Ms. Martin said that she supported Iowa's 2,100-hour requirement in theory — as did several of the women we spoke with — but that in practice, many of those hours were wasted, particularly once she got to the salon floor. Although Fridays and Saturdays would be busy, the rest of the week generally dragged. She'd be itching to practice what she had been learning in class. But some days there were so few customers that she'd sit and wait for hours. One day, she braved a snowstorm to get to the salon. The school had stayed open, requiring students to come in. Ms. Martin was the only one who did. She left at the end of the day without having seen a single customer — but those hours still counted toward the 2,100. She would shake her head when she saw other students, sick of the boredom, go home early. "That only works against you," she said. "You have to stay here and do absolutely nothing or you go home and lose the hours." The Iowa Cosmetology School Association said the state's system "provides the right amount of training time to practice on actual people." It also said that if some students waste hours sitting around, "it is unfortunate for both the student and the school." In interviews, more than twenty former students at schools represented by the association described experiences like Ms. Martin's. One former La' James student, Michelle Wipperman, said foot traffic in the salon at the Cedar Rapids school was so low, some students asked administrators if they could advertise more. She recalls being told that it would be too expensive. "I would say probably 60% of our time was sitting around waiting for people," Ms. Wipperman said. "There were times where I personally had met all my goals that I needed to meet. I was literally just waiting. I had to finish my clock hours.").

text.³² In this Article, the resultant ratio is called a health and safety rating.³³

Assuming that this is a reasonable methodology for providing an estimate of the health and safety portion of a personal appearance curriculum,³⁴ it follows that the number of hours of health and safety training for any given jurisdiction and subfield can be calculated. One simply multiplies the health and safety rating by the number of hours that the jurisdiction devotes to training in that subfield to arrive at an estimate of training, as expressed in hours, in health and safety for that subfield. For instance, and to put it less formally, the methodology of this Article finds that health and safety concerns constitute just over 3% of

32. One theoretical point is that there may be no relation between the magnitude of the risk entailed by a cosmetology procedure and the magnitude of the training that is needed to address it. So, for instance, if a cosmetology procedure presents a risk of severe harm when performed incorrectly or without appropriate precautions, it does not follow that the training related to it must be especially extensive or time-consuming. Rather, if the technique to address the inherent risks is easy to teach and to understand, then the appropriate training in this sphere might be performed relatively quickly. To put it another way, there is no proportional relationship between the severity of harm and the time needed to address or counteract it.

33. This rating measures text, not graphics or empty space. For instance, both the numerator and the denominator of the ratio would take into account tables of text and captions, but not photographs or illustrations. In a few instances, when a textbook described a procedure both in a chapter of its main text and in a step-by-step account after the main text of a chapter, those health and safety ratings comprise the average of two ratios: the percentage of words in the main text that appeared relevant to health and safety issues and the percentage of steps in the step-by-step account that appeared relevant to health and safety issues.

34. It is worth reiterating that this methodology provides an *estimate* of the portion of the cosmetology curriculum that is relevant to health and safety. Whether or not this is the best methodology, it is certainly a widely-used one in many fields. For instances of content analysis in other fields, see, e.g., Richard Griggs & Sherri Jackson, *Introductory Psychology Textbooks: An Objective Analysis Update*, 40 TEACHING PSYCHOL. 163 (2013); Heiki Klüver, *Measuring Interest Group Influence Using Quantitative Text Analysis*, 10 EUR. UNION POL. 535 (2009); James Guthrie et al., *Using Content Analysis as a Research Method to Inquire into Intellectual Capital Reporting*, 5 J. INTELL. CAP. 282 (2004). A critic of content analysis might charge that this method is subjective, and, of course, it is true that any sentence-by-sentence classification of a textbook will necessarily entail some degree of subjectivity. However, in the context of interpreting a textbook for the training of appearance professionals and then identifying the portions that are relevant to health and safety, the subjectivity is minimal: it is reasonable to predict that any careful reader will, for the most part, evaluate whether any given portion of this particular text is relevant to health and safety in much the same way as any other. Notably, the inputs and methods used here are transparent; the reader may use his or her own estimates (or even his or her own textbooks) to produce alternative figures and compare them with the results of this Article. These concerns fall generally under the headings of evaluative stability and reliability; for a discussion of these issues in content analysis, see, e.g., Stephen Lacy et al., *Issues and Best Practices in Content Analysis*, 92 JOURNALISM & MASS COMM. Q. 791 (2015).

Milady Standard Cosmetology's haircutting chapter. The significance of this is that if a jurisdiction's cosmetology curriculum requires 100 hours of haircutting instruction, this Article's methodology implies that just over 3% of the haircutting instruction — or three hours — is devoted to health and safety training.

This quantitative approach permits the calculation of the estimated portion of health and safety training in the required set of personal appearance subfields for any given profession and jurisdiction: this calculation is performed by summing all the hourly health/safety requirements for that jurisdiction that are already derived, then dividing that sum by the total number of hours that the jurisdiction requires. (To repeat: some additional assumptions that are needed to derive the health and safety portion of each subfield are described in Appendix A.) Here are the results ³⁵ from the qualifying jurisdictions:

Barbers on average must undergo 1,348 hours of training; the average percentage of health and safety training in their curriculum is 25.62%.³⁶

Cosmetologists on average must undergo 1,491 hours of training; the average percentage of health and safety training in their curriculum is 25.45%.³⁷

Manicurists on average must undergo 366 hours of training; the average percentage of health and safety training in their curriculum is 39.79%.³⁸

Given these figures, the average number of hours of required health and safety training for all qualifying jurisdictions can be calculated. On average, barbers must undergo 345 hours of health and safety training in qualifying jurisdictions; the analogous figure is 379 hours for cosmetologists and 146 hours for manicurists.³⁹

Again, the above figures are averages; the state-by-state figures, and the calculations they rest on, can be found in Appendix C. The method of calculation this Article uses is described in a more formal way in Appendix A. The bottom line: these calculations suggest that the health and safety training that is required for licensing is only a small fraction of the training that is typically

35. Solely for purposes of readability, the average hourly figures in the following three paragraphs are rounded to the nearest integer.

36. See *infra* Table 1(A).

37. See *infra* Table 1(B).

38. See *infra* Table 1(C).

39. A similar estimate for health/safety professional requirements, as expressed in hours, in all jurisdictions (that is, the set of qualifying and non-qualifying jurisdictions) can be derived by multiplying the averaged percentages above by the average hours of required training in that larger set of jurisdictions. The results — which don't vary much from the results for qualifying jurisdictions — are 339 hours for barbers, 373 hours for cosmetologists, and 145 hours for manicurists.

required for barbers, cosmetologists, and manicurists.⁴⁰

VI. A CROSS-CHECK OF THIS ARTICLE'S METHODOLOGY BASED ON EVERYDAY EXPERIENCE

How could one determine whether this Article's methodology accurately measures the portion of health and safety instruction contained in the training of appearance professionals? This section compares the results of the methodology described above with the results of an alternate, more intuitive form of measurement. When the results of the calculations above are compared with the results of everyday experience, this provides a cross-check for the calculation of health and safety training requirements. Consider a more granular examination of one health and safety rating — namely, the training in haircutting that cosmetologists must undergo.

Like most disciplines and crafts, the practice of cosmetology requires the internalization of skill sets as well as propositional knowledge. Only a subset of the practical and theoretical knowledge that cosmetology requires bears on health and safety. Below is a paraphrase, from *Milady Standard Cosmetology*, of the entire set of health and safety related concerns related to haircutting in the relevant forty-six pages⁴¹ of the chapter:

Cosmetologists should clean and maintain cosmetology instruments on a regular basis: for instance, haircutting shears require a daily regime of cleaning and lubrication, a daily regime of tension adjustment and balancing, a weekly regime of cleaning and lubrication, a post-service regime of disinfection, and an as-needed regime of sharpening.⁴²

Cosmetologists must learn to hold razors correctly, or they risk injury to themselves or their clients.⁴³

Cosmetologists must learn to hold shears correctly, or they risk damage from pressure on nerves and tendons.⁴⁴

Cosmetologists must learn proper posture and body position, or they

40. A more conservative set of assumptions, which assume a 25% rating rather than a 100% rating for such sciences as chemistry and anatomy, would lower the global health and safety rating for each set of curricula by several percentage points. Because there is no obvious relation between much of the Milady textbooks' treatment of the sciences as compared to the healthy and safe practice of cosmetology, there is an argument that these more conservative assumptions are just as appropriate. This issue is discussed briefly in Appendix C, and the results of this more conservative set of assumptions is provided at Tables 1A, 1B, and 1C.

41. MILADY STANDARD COSMETOLOGY, *supra* note 25, at 358-403.

42. *Id.* at 372-73.

43. *Id.* at 379.

44. *Id.* at 374-75, 377.

risk back and wrist strain.⁴⁵

The basic safety procedures for haircutting tools are as follows: palm cutting tools when combing or parting hair; do not cut past the second knuckle when cutting below your fingers, or when cutting palm-to-palm; take extra care when cutting around the ear; learn with a guard when practicing with a razor; and discard used blades in a puncture-proof container.⁴⁶

Clients should be instructed to close their eyes when their facial hair is being trimmed.⁴⁷

As noted above, thirty-eight of the jurisdictions studied in this Article require a detailed curricular breakdown of hours required for each cosmetology subfield;⁴⁸ twenty-four of those jurisdictions contain a clock-hour requirement for cosmetology training solely focusing on haircutting (or, in a few cases, a haircutting requirement that can be converted to clock hours). On average, those twenty-four jurisdictions require an average of 175.92 hours of training in haircutting; this training includes an average of 5.33 hours of training for haircutting that pertains to health and safety, as based on calculations involving the health and safety ratio described above.⁴⁹ Readers who want to compare this Article's health and safety rating methodology with an alternate form of measurement may wish to estimate, based on nothing more than common-sense experience, how long it should take to teach the set of propositions and procedures described in the bullet points above — and, in particular, whether it should take significantly more or less than 5.33 classroom hours (that is, about 5 hours and 20 minutes) to impart this information. More formally, one could view such an exercise as a construct validity cross-check.

Other cross-checks might be conducted by analyzing professional licensing exams or their outlines to determine the amount of health and safety content they contain, but that method is arguably much less helpful. The BIWG report discussed above provided “safety & sanitation” percentages for the cosmetology exams in five states; the average of those five states' figures is 24.9%, which is notably close to this Article's findings.⁵⁰ However,

45. *Id.* at 380-81.

46. *Id.* at 381-82.

47. *Id.* at 403.

48. *See infra* Table 2.

49. The reader may replicate this calculation by calculating the average of the hours required for training in haircutting specified by each of the twenty-four jurisdictions that require it as a free-standing field (see Appendix B for the data on the twenty-four jurisdictions), and then by multiplying that figure by 3.03%, the health and safety rating for haircutting.

50. Kaila M. Simpson et al., Examination of Cosmetology Licensing Issues, AM. INSTS. FOR RES. (Aug. 30, 2016), at 15, www.fbic.org/wp-content/uploads/2018/11/PBA_Examination_of_Cosmetology_Licensing_Issues_2016_0912.pdf [perma.cc/5FDN-PRMK]. This table provides “safety & sanitation” written exam outline percentages for Massachusetts (25-35%), Ohio

several factors suggest that the 24.9% figure is of uncertain relevance: the percentage of some category of knowledge that is tested may be distinct from the percentage of that category of knowledge that is taught; a set of data from only five states is hardly extensive; and, as discussed above, the BIWG report explains that some instances of safety and sanitation instruction may not be captured by its measurements.

Similarly, in the course of researching this Article, the author conducted an informal content survey of the 110 multiple-choice questions comprising the cosmetology exam of the National-Interstate Council of State Boards of Cosmetology — finding that 64 out of 110 questions, or roughly 58%, were relevant to health and safety. As noted immediately above, the fact that the percentage of some category of knowledge that is tested may be distinct from the percentage of that category of knowledge that is taught suggests that the health and safety portion of this cosmetology exam has little relevance as a cross-check.⁵¹

VII. OTHER JUSTIFICATIONS OF THE LICENSING OF PERSONAL APPEARANCE PROFESSIONALS: QUALITY AND QUASI-CERTIFICATION

As described at some length above, public-interest justifications for the licensing of appearance professionals generally rest on concerns about health and safety. Two other suggested justifications are discussed immediately below that seem significantly weaker: namely, that licensing conveys information about the quality of appearance services so as to benefit consumers or employers. (To repeat, this Article assumes that the licensing of appearance professionals to protect health and safety — and the corresponding training devoted to health and safety that occurs prior to licensing — is justified; notably, the question explored just below is whether additional training that would force a more extensive set of requirements for licensing is justified.)

(25%), Tennessee (20%), Texas (24%), and Hawaii (15%), as well as a practical exam percentage for Tennessee (41%). To calculate a five-state average, this Article assumes an input of 30.5% for Tennessee (by averaging the written exam and practical exam figures) and 30% for Massachusetts (by averaging the high and low figures supplied).

51. The author expresses appreciation here to the Council for its decision to permit analysis of their national exam by the author during his employment at the U.S. Department of Labor; like many tests, its contents are not available to the public. The Council has a legitimate interest in keeping the content of its exam secret; it follows from this that the author's analysis of exam questions cannot be checked or easily monitored. Unlike the other material analyzed in this Article, the exam is not transparent; unlike other findings in this Article, this particular finding therefore cannot be easily replicated.

The first non-health/safety justification: professional licensing is a useful sign of quality or competence.

As a general matter, as the technical skills and knowledge that are required for professional practice increase, the case for licensing is arguably stronger; that is because the consumer cannot reasonably be expected to have the technical understanding of a doctor (or lawyer, or engineer, etc.) and therefore might lack the informed judgment of a professional when making decisions without the benefit of relevant technical knowledge. Given the imperfect knowledge of the consumer, some people argue that the scope of consumer protection through licensing should not be confined to protecting the public from incompetent or dangerous providers of appearance services; in addition, the goal of licensing appearance professionals should be to protect the public from the actions of relatively unskilled practitioners — who might provide services that lack quality, good taste, or aesthetic appeal, even if those services meet professional health and safety standards.⁵²

However, with respect to the provision of aesthetic goods, this justification appears weak for several reasons. Preliminarily, it bears repeating that the public health/safety justification for the licensing of appearance professionals is accepted as a given; therefore, the relevant question is whether there is justification for the additional, marginal benefit to the public in terms of quality or competence that is not covered by training related to health and safety. The primary justification for licensing — the limited knowledge of the consumer — appears weaker when the consequence that might justify licensing is a bad aesthetic result, both because the stakes are lower and (as the saying goes) there is no accounting for taste; for those reasons, the risk of providing services that endanger beauty, but not health or safety, appears minor.

Providing a service that creates a less than aesthetically

52. The already-referenced statement from the NDP Analytics is worth repeating here: “Professional licensing in the beauty industry ensures the quality and safety of workers and ultimately protects consumers from unqualified, unsafe workers.” Nam Pham & Anil Sarda, *The Value of Cosmetology Licensing to the Health, Safety, and Economy of America*, NDP ANALYTICS (Feb. 2015), ndpanalytics.com/wp-content/uploads/Report-21.pdf [perma.cc/TBD8-QXAN]. Presumably, “quality and safety” is meant to connote something different from “safety.” Similarly, advocates of the preservation of florist licensing in Louisiana have defended the practice on the basis that it is “necessary to protect consumers and ensure that the products florists put out are up to snuff”; another advocate of florist licensing argued that licensed florists have an “understanding of the principles and practices of floral arranging and the mechanics that are involved.” See Dick M. Carpenter II, *Blooming Nonsense*, 34 REG. 44, 44-47 (2011). Such statements imply that one goal of licensing is to bolster aesthetic quality; the Carpenter article describes an experiment that suggests that, if bolstering aesthetic quality is a goal of licensing, at least in some contexts this goal is unsuccessful.

pleasing consumer product is not generally viewed as a significant social problem that creates a need for regulation; this state of affairs is reflected in the American legal system, in which the unattractive result of an appearance procedure might struggle to fit inside a cause of action. This is presumably true in many instances both because opinions about beauty improvements or deficiencies often have some degree of subjectivity, and because changes in appearance produced by appearance professionals are often exceedingly temporary. Assume for a moment that there are shared, widely-held standards of beauty that relatively skilled appearance professionals will be guided by and unskilled practitioners will not: it nonetheless seems fair to say that the judgments of consumers – whose assessments of those providers will be reflected by their choices in the marketplace – will serve the purpose of driving sub-par professionals out of business just as well as would any system of licensing that incorporates judgments about good taste. And, of course, there is a long history of the private sector producing its own signals of quality and competence, such as brand names, warranties, certifications, ratings from consumer organizations, and peer-to-peer online interaction. Many, if not most, services for which quality is a concern are provided without a licensing scheme; in such cases, market mechanisms force providers to deliver quality.

The second non-health/safety justification: the licensing of appearance professionals makes evaluation easier for prospective employers.

Some advocates of cosmetology licensing argue that licensing makes it considerably easier for salons or other cosmetology businesses to hire more skilled or more capable cosmetologists. The argument, in a nutshell, is that a license serves as a quality signal for employers; instead of spending hours testing a potential employee by means of exam, portfolio, or audition, employers get immediate access to the information that a license conveys, which denotes a significant amount of training and knowledge.

This justification of the licensing of appearance professionals may seem strong to salon owners and managers, but it appears exceedingly weak when viewed from the perspective of public-interest justification. The public has little or no interest in bearing the costs of salon talent searches or salon administration generally; this proposed justification suggests that it is appropriate for the public, through the institution of licensing, to absorb some portion of the salon's expenses of prospective employee evaluation by means of a mechanism that is similar to an industry-specific subsidy.⁵³

53. Notably, whether one assumes a universe where licensing provides salon managers with the kind of quasi-certification discussed here or whether one assumes a universe where the search costs are assumed directly by the salon manager, consumers ultimately bear such search costs; they are passed along

Although a manager might be enthusiastic about requiring the general public to bear some portion of the cost of his or her business model, the general public is unlikely to share that enthusiasm. (Notably, employers who want a mechanism to provide signals about the quality of potential employees are looking for something like certification — a process that demonstrates qualifications or adherence to industry standards — but licensing is far from the only mechanism that could provide such signals; in a world in which licensing only covered health and safety training, potential employers might take into account the informal certification that a barbering- or beauty-school degree provides, or they might begin to rely more heavily on already-existing certification programs.) In short, this justification seems to have the same strengths and weaknesses as any other justification of taxpayer-funded subsidies to a particular business, industry, or economic sector.

There are other justifications of licensing that are much less defensible. One such justification of licensing is that it raises the compensation or the social prestige of the licensee through the creation of artificial scarcity. Another such justification of licensing is that it must be maintained in order to preserve the revenue streams from licensing fees that go to government treasuries. These justifications are even more unlikely to be persuasive to those who believe that licensing must be judged by its impact on the public interest.⁵⁴

to consumers by means of higher prices. Unless one assumes that every single salon manager wants this kind of quasi-certification and that there are no extra administrative costs involved in providing it through licensing (two highly dubious assumptions), letting each salon manager carry out talent searches in the way that he or she deems best seems to be the more efficient alternative.

54. Nick Robinson provides an extensive account of justifications for licensing schemes in *The Multiple Justifications of Occupational Licensing*, 93 WASH. L. REV. 1903 (2018), such as protecting the public from harm, aiding communities of specialized knowledge, fostering relationships of trust, and buffering producers from the market. Of course, opinions will vary about the force of any justification. Indeed, the universe of possible justifications for licensing is ultimately limited only by human creativity: two beauty industry representatives recently argued that a fundamental purpose of licensing in California is to protect the rights of salon workers (their October 17, 2019, letter — from Ted Nelson and Robert Gross, both of the Professional Beauty Federation of California, to state Sen. Steven Glazer of California — is on file with this Article's author). This particular argument is undercut by an examination of California's training curricula (see Appendix B); although barbers and cosmetologists are required to receive 20 hours of training in professionally relevant law and regulations, the evidence that California licensees receive significant training in the protection of workers' rights as such is not strong. For an interesting account of a Nebraska legislative hearing on appearance training requirements, in which witnesses advocated the preservation or expansion of the state's then-2,100-hour training requirement for barbers and cosmetologists so that prospective appearance professionals could receive additional instruction in such matters as business marketing, personal finance, and the importance of civic participation, see Jared Meyer, *Nebraska Requires Barbers To Train Longer Than EMTs. That's Ridiculous*,

In short, the justifications for the licensing of appearance professionals described in this section appear to fail the test of public-interest justification that health and safety training related to licensing passes. Notably, even if certain categories of appearance training benefit some private interests (for instance, a set of students or a set of prospective employers), it does not follow that these categories of training advance the public interest that is typically the rationale for licensing.

VIII. THE EFFECTS OF OVER-EXTENSIVE LICENSING REQUIREMENTS; THE EFFECTS OF REFORM

In order to become licensed, an appearance professional must typically devote a substantial amount of time and money to that endeavor. For example, an aspiring cosmetologist must take, on average, 1,491 hours of classes,⁵⁵ pass two comprehensive exams, and pay \$177 in fees.⁵⁶ Tuition and training-related expenses in private cosmetology schools average more than \$17,000 nationally.⁵⁷ Median income for appearance professionals is significantly below the individual median income as a whole; as of May 2019, the Bureau of Labor Statistics estimated the median annual wage of hairdressers, hairstylists, and cosmetologists to be \$26,090.⁵⁸ Becoming a licensed cosmetologist implies a significant life investment relative to expected returns that implies substantial direct and indirect costs (costs of time, costs of tuition, opportunity costs of foregone income, etc.).

The findings of this Article suggest that licensing requirements for appearance professionals that are not based on health and safety concerns are hard to justify. The negative effects of over-extensive licensing requirements are now well-trodden ground. For workers, they include fewer job opportunities, reduction in career

FEDERALIST (Dec. 13, 2017), www.thefederalist.com/2017/12/13/nebraska-requires-barbers-train-longer-emts-thats-ridiculous/ [perma.cc/2NGY-BA4A].

55. This figure is based on calculating an average from fifty-one jurisdictions, based on information in Appendix B. The figure is, of course, distinct from the average hourly burden of the qualifying cosmetology jurisdictions supplied in section 4 above; only thirty-eight jurisdictions are used for that average, but the global figure takes into account all fifty-one U.S. jurisdictions.

56. CARPENTER ET AL., *supra* note 1, at 154.

57. Kolodner and Butrymowicz, *supra* note 1. A 2016 report found that cosmetology tuition averaged roughly \$14,600 per student, with textbooks and supplies costing an additional average of \$1,700. Kaila M. Simpson et al., Examination of Cosmetology Licensing Issues, AM. INSTS. FOR RES. (Aug. 30, 2016), at 30, www.fbic.org/wp-content/uploads/2018/11/PBA_Examination_of_Cosmetology_Licensing_Issues_2016_0912.pdf [perma.cc/5FDN-PRMK].

58. *Occupational Employment and Wages, May 2019: 39-5012 Hairdressers, Hairstylists, and Cosmetologists*, U.S. BUREAU LAB. STAT., www.bls.gov/oes/current/oes395012.htm [perma.cc/G9XV-M7TC] (last updated July 6, 2020).

advancement, and roadblocks to geographic mobility. For employers, they include a clogged professional pipeline that causes shortages in available and hireable candidates for employment. For the public, they include the weakening of innovation and competition as well as higher prices on services. More formally, one could understand over-extensive licensing requirements as something like the imposition of an additional tax that licensees must pay. In this case, licensees would pass along the cost of doing business to salon owners or consumers, who would ultimately either pay a higher price for the same service or exit the market.

Indeed, some argue that incumbent providers typically support extensive licensing requirements in order to increase their own profits and to block new entrants from the marketplace, so as to reduce competition.⁵⁹ Whether this is true or not, it is unusual to see trade associations call for reductions in the licensing requirements of the trade they represent. From the perspective of regulatory reform, the decision of the Professional Beauty Association (the association for cosmetology professionals) to recommend reducing the training hours that a cosmetology license requires is noteworthy. The Future of the Beauty Industry Coalition (FBIC), which includes the Professional Beauty Association, has called for a 1,000-hour cosmetology curriculum;⁶⁰ in the context of a fifty-one jurisdictional average curricular requirement of nearly 1,500 hours, and with only three or four jurisdictions currently having curricular requirements as low as 1,000 hours,⁶¹ this is striking.

According to FBIC data, longer training requirements increase student loan debt, but do not increase wages or exam passage rates.⁶² Perhaps relatedly, the debt burden that some classes of appearance professionals bear is notably riskier than the norm.⁶³ This Article's data can be understood as providing additional grounding for the FBIC's advocacy of reducing the training that cosmetology licensing requires, but for different reasons: namely, the primary public benefit of licensing for cosmetologists is health and safety, and the quantitative data on the proportion of health and safety training in cosmetology training today suggests that the

59. See, e.g., FRIEDMAN, *supra* note 8, at 137-60; Simon Rottenberg, *Introduction*, in OCCUPATIONAL LICENSURE AND REGULATION, *supra* note 7, at 4, 4-5.

60. Future of the Beauty Industry Coalition, "Common Sense Reform" handout.

61. New York, Texas, and Vermont are the three states that require only 1,000 hours for cosmetology licensing as such; in Massachusetts, the receipt of a cosmetology license requires not only 1,000 hours of training, but also two additional years of work under the supervision of a licensed cosmetologist.

62. "Common Sense Reform" handout *supra* note 60.

63. Kolodner and Butrymowicz, *supra* note 1, briefly discusses how cosmetology programs have "fared particularly poorly" on this dimension in the past.

required hours for cosmetology training could be streamlined — that is, they could be significantly reduced without any impact on health and safety training.

None of these arguments implies that the portion of appearance training that does not advance health and safety is useless; rather, the question this Article explores is whether such training should, mandatorily, precede licensing. It is reasonable to predict that if licensing requirements for appearance professionals were more fundamentally based on health and safety training, potential employers would be likely to focus more on the quality of the professional training outside of licensing-related health and safety requirements that potential employees had received — perhaps encouraging those employers to focus more on what postgraduate in-house training is necessary, or how much weight should be given to the brand quality of competing barber or beauty schools. (As discussed briefly in Section VII above, this kind of market mechanism is much closer to certification than to licensing.) Reducing the burden of licensing borne by appearance professionals would open up a labor pipeline and make it easier and faster for them to find work (and to be allowed to work);⁶⁴ perhaps less obviously, the incentive effects for employers created by licensing reform would also inject more competition into the market.

Any discussion of quality of services in this context should avoid confusing two different questions. First, what are the appropriate public-policy goals for the licensing of appearance professionals? Second, what are the appropriate public-policy methods of advancing quality in services from appearance professionals? These are distinct questions, and the urge to collapse them should be resisted. Until it is shown that licensing is especially capable of producing quality of services from appearance professionals, it is reasonable to consider the possibility that various formal and informal methods of quality assurance (for instance, credentials produced by third parties, online consumer reviews, etc.) are arguably cheaper, less burdensome, and at least as powerful.⁶⁵

64. Some have contended that state-level policymakers who reduce the hourly requirements of training curricula are harming the economic prospects of future licensees, arguing that such a reduction will make it more difficult for those licensees to acquire license recognition should they move to another state. Those who are concerned about the job prospects of future licensees, however, could likely address that concern more efficiently by reducing barriers to the employment of licensees more broadly — that is, by both streamlining their state's training curricula and liberalizing their state's rules of interstate license recognition.

65. See generally John K. Ross, *The Inverted Pyramid: 10 Less Restrictive Alternatives to Occupational Licensing*, INST. FOR JUST. (Nov. 2017), ij.org/wp-content/uploads/2017/11/Inverted-Pyramid_FINAL.pdf [perma.cc/Z9KP-RLPA].

IX. TOPICS FOR FURTHER RESEARCH

This inquiry into the implications of the health and safety training that is required for licensed appearance professionals suggests several other research possibilities:

What is the nature and proportion of the health and safety training requirements for other licensed professions, and are they susceptible to similar content analysis and similar implicit policy recommendations?

Would a more extensive content analysis of license examinations for appearance professionals demonstrate a relationship to license-related curricula? Would such findings suggest similar implicit policy recommendations?

Rather than a proportional-word or -sentence content analysis, would it be fruitful instead, or in addition, to calculate the amount of time needed to teach health and safety skills in various appearance-related subfields and produce a reasonable health and safety rating (or proportion) from that data? Is there a practical way to produce such a calculation that would be reasonably reliable and valid?

How strong are the justifications of licensing of particular professions which do not rest on health or safety?

Is there a fruitful method of comparing health- and safety-related incidents connected to the practice of appearance professions to the level of licensure in the jurisdiction? For instance, is there a fruitful method of comparing health- and safety-related incidents connected to the practice of cosmetology between jurisdictions that do and do not license them (for instance, U.S. jurisdictions vs. Canadian jurisdictions), or are there confounding factors that would make the comparison fruitless?

Is there a measurable relationship between the training that appearance professionals receive and the health/safety incidents that occur as a result of the practice of their profession?

X. SUMMARY AND CONCLUSION

This Article takes as a given that the licensing of personal appearance professionals advances the public's health and safety. It compiles the curricular requirements for three types of appearance professionals in fifty states and the District of Columbia, finding that nearly three-quarters of those jurisdictions require either clock-hour curricula specified in statutes and regulations or a set of curricular requirements that can be converted to clock hours. It conducts a content analysis of the fields' leading instructional textbooks in order to determine what portion of those texts deal with issues of health and safety, assuming that the textbooks' treatment is an accurate and complete discussion of each subfield. Using that analysis and quantitative data from those

jurisdictions, it estimates the number of hours that each training subfield could be expected to devote to issues of health and safety. Based on this method, it finds that each jurisdiction's required training for barber and cosmetologist licensing that pertains to health and safety is approximately 25% of the total training hours that jurisdiction requires, and that the corresponding figure for manicurists is approximately 40%. It provides an informal basis for cross-checking this method's validity. It finds that several alternative justifications for the licensing of appearance professionals (given that the justifications are separable from concerns about health and safety) are relatively weak.

The findings in this Article are not a criticism of the appearance industry or the training of appearance professionals as such; rather, these findings suggest that licensing has an over-extensive set of requirements (or, to put it another way, that a substantial portion of the licensing requirements for appearance professionals are unrelated to health and safety), and more precisely that it is difficult to see what public benefits are produced by a substantial portion of the burdens of licensing in these fields. The kind of analysis implied by this Article — exploring the public benefits of some given profession's licensing requirements, one by one — may be a necessary foundation if the goal is to determine the nature of appropriate streamlining of licensing requirements.

State-level policymakers who regulate the training of appearance professionals should find this Article to be of interest. A central theme is that the public or consumer benefits of the vast majority of the typical curriculum of the licensed appearance professional (as measured in hours) are difficult or impossible to discern; therefore, policymakers may wish to scrutinize their jurisdiction's curricular requirements to determine whether all those requirements create genuine public benefits or whether some can be streamlined, either in scope or categorically. Notably, even one of the trade associations for appearance professionals, the Professional Beauty Association, has called for a substantial reduction in required curricular hours in most states. The kind of examination this Article invites will require policymakers to evaluate the public benefits of their own jurisdiction's requirements for the licensing of appearance professionals independently, rather than simply accepting the judgment of outside (and possibly self-interested) parties. If there are significant portions of a state's curriculum for appearance professionals that do not produce public benefits like health, safety, or an equally compelling value, policymakers may wish to explore the reduction or elimination of such unproductive requirements. It is reasonable to predict that reducing these training requirements will promote the interests of the nation's wage earners and job seekers by creating more opportunities for gainful employment.

Appendix A: Some Necessary Assumptions for Cross-Jurisdictional Comparisons and Health/Safety Measurements

The quantitative findings in this Article are made possible by the fact that the majority of jurisdictions provide a mandatory curriculum for the licensing of appearance professionals: in order to receive a license, an aspiring professional must typically receive instruction in a given number of fields for a given number of hours. This Article calculates a health and safety rating for each field (the method of calculation is described below in this Appendix) and then multiplies that rating by the number of hours required. When all of the resultant products are summed, this sum reveals the jurisdiction's total hours of health and safety instruction; when that sum is divided by the total number of hours of training that the jurisdiction requires for licensing, this quotient reveals the percentage of health and safety instruction that the jurisdiction's curriculum requires.

Some minor assumptions and adjustments were necessary in order to produce clock-hour curricular descriptions that are comparable across jurisdictions; those assumptions are explained below.⁶⁶

Many jurisdictions require both theoretical and practical training in various subfields. Connecticut (for instance) requires cosmetologists to undergo a minimum of 75 classroom hours and 750 clinical or practical hours in "hair shaping, styling, and shaving," which means that cosmetology students in Connecticut must undergo roughly two weeks of lectures on basic matters of hair design as well as roughly 20 weeks of practice on (for instance) wigs, mannequins, the public, or each other. For the purposes of this Article, theoretical and practical training in each specified subfield are added together, which means that in this case Connecticut is recorded as requiring 825 hours of training in this subfield.⁶⁷

Occasionally, the practical experience that some jurisdictions require is expressed by specifying a required number of procedures or services, rather than by specifying clock hours. For instance, California's 100-hour manicuring and pedicuring requirement for cosmetology students contains four further requirements within it: 10 hours of technical instruction on manicuring and pedicuring, the provision of 25 manicuring and pedicuring services, 25 hours of technical instruction on artificial nails and wraps, and the provision of 120 artificial nails and wraps. In order to convert such requirements to a total of 100 classroom hours, this Article relies on estimates from the Cosmetology and Massage Therapy Section of the Arkansas Department of Health, which helpfully provided estimates of how long various cosmetology procedures would generally take to

66. Appendix A does not contain citations for most of the claims made in it; for the most part, the reader who wishes to confirm the claims in this Appendix should see Appendix B.

67. *See infra* Table 2.

perform. Using those estimates and some related assumptions, this Article converts several sets of state-law procedural requirements to clock-hour requirements.⁶⁸

There are a few jurisdictions that do not offer (for instance) a cosmetology license, but instead mandate comparable training and licensing in what they call hairdressing or hair design; the same is true for manicurists as compared to nail technicians. Such differences in labels should not be viewed as signaling large differences in substance; instead, this Article refers to the relevant licenses and disciplines as cosmetology and manicuring generally. If a jurisdiction does not offer a professional license that has some particular label but does offer a closely related license that appears to offer training in more or less the same set of fields, this Article does not generally distinguish between those labels.⁶⁹

Some jurisdictions supply curricular guidelines or recommendations; some jurisdictions provide minimum curricular requirements; some jurisdictions are less tolerant of variance, allowing for no upward or downward departures from the specifications they provide. With respect to measurement, this Article ignores the distinctions laid out in the previous sentence; it assumes (for instance) that all cosmetology schools within a given jurisdiction will teach the jurisdiction's recommended curricula and not add to the jurisdiction's minimum guidelines.⁷⁰

Some jurisdictions lump various subfields of professional appearance training together and require a sum of training hours for those combined fields. For instance, one of the requirements of the Massachusetts cosmetology curriculum is 250 hours of study in hair straightening and permanent waving.⁷¹ The proportion of health and safety instruction for those two subfields differs slightly. This Article's methodology generally assumes that when multiple subfields are combined to produce a larger, lumped-together requirement, the number of hours devoted to each of the subfields is equal; in this instance, it interprets the Massachusetts 250-hour requirement as equivalent to 125 hours of training in hair straightening and 125 hours of training in permanent waving. This Article uses the same assumption for most combinations of subfields: for instance, if a jurisdiction requires a total of 1,000 hours of training for 10 different subfields but does not further specify a distribution of hours by subfield, it assumes an assignment of 100 hours for each of the 10 subfields. However, there is one exception to this averaging heuristic that is described near the end of this Appendix.

Assumptions like the above are necessary in order to compare one jurisdiction's hourly requirements to another. Furthermore,

68. State Representative Richard Womack of Arkansas requested these estimates from Kelli Kersey of the Arkansas Department of Health before giving them to this Article's author. Ms. Kersey's estimates are contained in a November 14, 2018, letter; a copy is on file with this Article's author.

69. *See infra* Appendix B.

70. *See infra* Appendix B.

71. *See infra* Table 2.

some assumptions are necessary in order to come up with a figure for the health and safety ratings for certain subfields; those assumptions are discussed immediately below.

Trade subfields. As described in section 4 of this Article, with respect to trade subfields such as hairstyling, manicuring, and haircoloring, this Article derives a rating for health and safety training based on the ratio of health and safety instruction to the entire text of the relevant chapter or section of the relevant Milady textbook. With respect to a few subfields, those textbooks contained both an extensive discussion of the trade subfield (something like a small treatise) as well as a step-by-step guide that explained how to perform the service. For certain subfields, this Article therefore treats the discussion and the guide as two separate texts: this Article's methodology derives both a health and safety rating for the discussion text (by dividing the amount of health and safety discussion in the chapter by the chapter length) and a health and safety rating for the step-by-step text (by dividing the number of steps relevant to health and safety by the total number of steps), and then averaging those two ratings together.⁷²

Law, rules, and/or regulations. This Article assumes that 100% of the hours devoted to instruction about binding government edicts is relevant to health or safety. In some cases, this might lead to an overestimate of health/safety content.⁷³

“Theory” subfields. Some curricula specify theoretical instruction about various subfields — for instance, “theory of hair coloring.” These requirements are treated as identical to the field or fields they specified — for instance, “theory of hair coloring” is treated identically to “hair coloring.” In a few cases, this Article draws necessary inferences about which subfield or subfields were implied.⁷⁴

Health, safety, sterilization, bacteriology, or sanitation. Hours devoted to instruction in these are almost invariably pertinent to health or safety, and so these areas received a 100% rating as well.⁷⁵

Instruction hours that were unassigned or unspecified allow the school or instructor to choose particular subjects or subfields for additional training. These hours received a 0% rating.⁷⁶

The sciences. This Article assumes that the discussion of scientific disciplines like anatomy, physiology, or chemistry that is provided in the Milady textbooks is relevant to health or safety in the same absolute way that training that is specifically focused on (for instance) sterilization and decontamination is. It therefore assigns these areas a 100% rating. Because there is an

72. *See infra* Appendix B.

73. *Id.*

74. *Id.*

75. *Id.*

76. *Id.*

argument that 100% is an overestimate in this context, this Article also provides an alternate set of health and safety ratings for jurisdictions in Appendix C that are based on lower health and safety ratings for training in the sciences.⁷⁷

“Soft” and “vague” fields. This Article assigns a minimal rating, typically 1%, to “soft” fields such as poise, deportment, or the history of barbering. However, it arbitrarily assigns a 25% rating to such vague and broad fields as “management,” “product knowledge,” and “ethics” which seemed to imply some significant portion of health and safety content. Nonetheless, it seems likely that, in some cases, this 25% rating significantly overstates any reasonable estimate of health and safety content.⁷⁸

As described above in this appendix, when two or more subfields were combined into one hourly requirement, this Article’s method generally assumes that such a grouping implies that a roughly equal amount of time would be devoted to each subfield; for the most part, this method therefore averages them out to produce a combined figure. However, there is one exception to this rule: when a jurisdiction’s entire required curriculum consists only of one specified hourly requirement and a set of subfields which do not specify any further hourly assignments, it is assumed that these requirements were insufficient to draw reasonable inferences about the emphasis or magnitude that any particular subfield would receive under state regulation or law.

Some states have established other professional licenses that allow similar scopes of practice to those of barbers and cosmetologists (for instance, the state of Washington licenses hair designers as well as barbers and cosmetologists). Because of the relative scarcity of these other licenses, any cross-jurisdictional comparison of them would provide relatively little information. Hair design licenses and their like are therefore not analyzed in this Article, except when such licenses have functionally replaced barbering or cosmetology licenses completely.

Appendix B: A Plain-Language Interpretation and Description of Curricular Requirements by Jurisdiction

Immediately below is a plain-language interpretation and summary of the clock hours that each jurisdiction requires for school-based licensing for three classes of personal appearance

77. An examination of the Milady textbooks’ discussion of the sciences might suggest to the reader that significant portions of that discussion are not relevant either to health/safety concerns or to the practice of the appearance professions generally. Appendix C provides the results of different health and safety ratings for the sciences.

78. Consider the Arkansas 50-hour “professional ethics” requirement, which consists of “courtesy, neatness, and professional attitude in meeting the public, etc.,” it seems unlikely that anything like one-quarter of such a course of instruction could have any relation to public health and safety.

professionals, arranged alphabetically by state and then by profession.⁷⁹ The summaries below describe the curricula for barbers, cosmetologists, and manicurists in each state. As discussed above, these are functional categorizations that are based on the substance of each jurisdiction's professional training, not the local label that a jurisdiction might use. (For instance, this Article groups together all those whose primary training is on the care and beautification of the human nail and refers to them as manicurists, even if some jurisdictions refer to them as nail technicians.) As explained in Appendix A above, some interpretive assumptions were occasionally necessary to convert subfield distribution requirements to appropriate clock hours: for instance, it bears repeating that many subfield requirements consist of both a theory component and a practice component (the former might involve listening to a lecture, while the latter might involve performing a procedure). For the purposes of this analysis, the hours of both components are summed.

Alabama

Alabama requires a barbering curriculum of 1,000 hours.⁸⁰ That curriculum contains requirements for the following subfields: shampooing (39 hours); scalp and hair treatments (15 hours); hair shaping (50 hours); hair styling (285 hours); permanent waving (96 hours); chemical relaxing (15 hours); hair coloring (125 hours); skin care (60 hours); science and sanitation (75 hours); and unassigned hours (240 hours).⁸¹

Alabama requires a cosmetology curriculum of 1,500 hours. That curriculum contains requirements for the following subfields: shampooing (57.5 hours); scalp and hair treatments (22.5 hours);

79. This interpretation and summary are subject to several caveats. Some jurisdictions have more than one set of curricular requirements; how they are applied to any given student sometimes depends on the student's date of school enrollment. In such cases, this Article assumes that the student is starting today (or, more precisely, that the student is starting more recently, not less recently). Furthermore, for the most part, this Article does not provide information about apprenticeship, an alternative path to school-based licensing that some jurisdictions permit: an appearance professional's apprenticeship typically requires far more hours of training. This Article also does not provide information about (for instance) requirements for college-based appearance instruction which a few states offer as a variant path to licensing; instead, the descriptions below are largely confined to the rules that govern the curricula of professional schools. Somewhat relatedly, there are a few instances in which graduates of professional schools are required by law to serve an apprenticeship with a licensed and established professional before they can practice; that kind of requirement is typically not included in these calculations. Finally, to state the obvious, statutes and regulations change over time. This Article describes the legal and regulatory landscape as of January 10, 2021, but regulatory and legal changes will almost inevitably make it outdated.

80. ALA. CODE § 34-7B-17 (2021).

81. Email from Donna Thompson (of the Alabama Board of Cosmetology) in response to author's inquiry, July 15, 2020.

manicure (26.5 hours); hair shaping (75 hours); hair styling (415 hours); permanent waving (140 hours); chemical relaxing (22.5 hours); hair coloring (182.5 hours); skin care (87.5 hours); brow and lash care (16 hours); science and related services (107.5 hours); and unassigned hours (347.5 hours).⁸²

Alabama requires a curriculum of 750 hours for manicurists. That curriculum contains requirements for the following subfields: bacteria and other infections (90 hours); salon safety (50 hours); sanitation (90 hours); nails/nail disorders (80 hours); skin/skin disorders (40 hours); client consultation (40 hours); manicure (50 hours); pedicure (50 hours); nail tips (55 hours); nail wraps (55 hours); acrylic nails (55 hours); nail art (55 hours); salon management (15 hours); marketing/services (15 hours); and unassigned hours (10 hours).⁸³

Alaska

Alaska requires a barbering curriculum of at least 1,650 hours.⁸⁴ That curriculum contains requirements for the following subfields: wet hairstyling and drying (30 procedures); thermal hairstyling (180 procedures); permanent waving (50 procedures); chemical straightening (10 procedures); haircutting (400 procedures); haircoloring and bleaching (75 procedures); scalp and hair treatments (10 procedures); beard trimming (50 procedures); beard shaving (50 procedures); as well as 185 hours of “theoretical instruction.”⁸⁵ In order to convert procedural requirements into clock hours, this Article relies on Arkansas Department of Health cosmetology duration estimates (see Appendix A) to produce a set of clock-hour requirements; the resulting requirements are then multiplied by approximately 127% so that the set of these requirements sums to 1,650 hours. (More precisely, each resultant clock-hour requirement is multiplied by the ratio of 1,650 hours to the sum of the derived clock-hour requirements — as well as multiplying the 185-hour “theoretical instruction” figure by the same ratio — so that the revised sum of all requirements expands to the required 1,650 hours. Additionally, the products are rounded to whole numbers and, in the case of “scalp and hair treatments” and “beard trimming,” the products are increased slightly.)

Alaska requires a hairdresser curriculum of at least 1,650 hours.⁸⁶ That curriculum contains requirements for the following subfields: wet hairstyling and drying (180 procedures); thermal hairstyling (180 procedures); permanent waving (80 procedures); chemical straightening (10 procedures); haircutting (250 procedures); haircoloring and bleaching (75 procedures); scalp and

82. ALA. CODE § 34-7B-18 (2021); Donna Thompson email.

83. ALA. CODE § 34-7B-21 (2021); Donna Thompson email.

84. ALASKA ADMIN. CODE tit. 12, § 09.002 (2021).

85. ALASKA ADMIN. CODE tit. 12, § 09.160 (2021).

86. ALASKA ADMIN. CODE tit. 12, § 09.002 (2021).

hair treatments (10 procedures); beard trimming (5 procedures); eyebrow arching and hair removal (15 procedures); makeup (15 procedures); manicure (15 procedures); as well as 185 hours of “theoretical instruction.”⁸⁷ In order to convert procedural requirements into clock hours, this Article relies on Arkansas Department of Health cosmetology duration estimates (see Appendix A) to produce a set of clock-hour requirements; each requirement is then multiplied by approximately 116% so that the set of these requirements sums to 1,650 hours. More precisely, each resultant clock-hour requirement is multiplied by the ratio of 1,650 hours to the sum of the derived clock-hour requirements, so that the revised sum of all requirements expands to the required 1,650 hours.

Alaska requires a 12-hour curriculum for manicurists that consists of these subfields: bacteria (1 hour), infectious agents (2 hours), sanitation (3 hours), harmful products and protection (2 hours), anatomy and physiology (2 hours), and nail disorders (2 hours).⁸⁸

Arizona

Arizona requires a barbering curriculum of at least 1,500 hours.⁸⁹ The curriculum has two requirements under state law: (1) at least 250 hours devoted to the study of the fundamentals of barbering, hygiene, bacteriology, histology of the hair, skin, muscles and nerves, structure of the head, face and neck, elementary chemistry relating to sterilization and antiseptics, and diseases of the skin, hair and glands, and (2) at least 1,250 hours devoted to the practice and study of massaging and manipulating muscles of the scalp, face and neck, haircutting, shaving and chemical work relating to permanent waves and hair straightening, coloring and bleaching.⁹⁰ Furthermore, Arizona regulatory requirements include instruction in professional ethics, shop management, and relevant law and regulatory provisions, but because those constraints are not included in the 1,500-hour requirement,⁹¹ they are not measured here.

Arizona requires a cosmetology curriculum of 1,600 hours⁹² and specifies multiple required subfields,⁹³ but does not specify any hourly requirements for those subfields. Arizona requires a 600-hour course of study for manicurists but does not allocate hours in any subfields.⁹⁴

87. ALASKA ADMIN. CODE tit. 12, § 09.160 (2021).

88. ALASKA ADMIN. CODE tit. 12, § 09.143 (2021).

89. ARIZ. REV. STAT. § 32-325 (LexisNexis 2021).

90. *Id.* § 32-325(B).

91. ARIZ. ADMIN. CODE § R4-5-407(B) (2021).

92. ARIZ. REV. STAT. § 32-511 (LexisNexis 2021).

93. ARIZ. ADMIN. CODE § R4-10-304 (2021).

94. ARIZ. ADMIN. CODE § R4-10-305 (2021).

Arkansas

Arkansas requires a 1,500-hour barbering curriculum.⁹⁵ That curriculum contains hourly requirements for the following subfields: hygiene and sanitation (80 hours); related science (175 hours); shaving and beard trimming (50 hours); barber chemical services (345 hours); barbershop management (65 hours); salesmanship/product knowledge (50 hours); hairstyling and waving (300 hours); haircutting and bobbing (425 hours); and shop deportment (50 hours).⁹⁶

Arkansas requires a 1,500-hour cosmetology curriculum. That curriculum contains hourly requirements for the following subfields: hygiene and sanitation (80 hours); related science (120 hours); hairdressing (including shampooing, haircutting, tinting, chemical relaxing, etc.) (1000 hours); manicuring (100 hours); aesthetics (100 hours); salesmanship and shop management (50 hours); and professional ethics, which is defined as “courtesy, neatness, and professional attitude in meeting the public, etc.” (50 hours).⁹⁷

Arkansas requires a 600-hour course of study for manicurists, broken down into these subfields: health and sanitation (75 hours), health-related science (75 hours), manicures and pedicures (200 hours), advanced nail technology (200 hours), and career technology (50 hours).⁹⁸

California

California requires a 1,500-hour barbering curriculum. That curriculum contains minimum requirements for hairdressing (65 hours and 240 procedures); waving and straightening (40 hours and 105 procedures); haircoloring and bleaching (60 hours and 50 procedures); haircutting (20 hours and 80 procedures); shaving (100 hours and 40 procedures); laws and regulations (20 hours); health and safety (45 hours); disinfection and sanitation (20 hours); and anatomy and physiology (15 hours). Furthermore, the requirements of the first four procedures, when added together, comprise a minimum of 1,100 hours of education.⁹⁹ In order to convert procedural requirements into clock hours, this Article relies on Arkansas Department of Health cosmetology duration estimates (see Appendix A) to produce a set of clock-hour requirements. The

95. ARK. CODE ANN. § 17-20-407(b)(2)(A) (2021).

96. *Arkansas Rules & Regulations for Barbering*, ARK. ST. BOARD BARBER EXAMINERS, www.arbarber.com/pdf/RulesandRegulations.pdf [perma.cc/72KW-QXVD] (last visited Mar. 10, 2021).

97. *Rules and Regulations for Cosmetology in Arkansas*, ARK. ST. BOARD BARBER EXAMINERS, Rule 7.14, www.sos.arkansas.gov/uploads/rulesRegs/Arkansas%20Register/2016/feb2016/007.30.15-003.pdf [perma.cc/T3KG-ACTP] (last visited Mar. 10, 2021).

98. *Id.* Rule 7.15.

99. CAL. CODE REGS. tit. 16, § 950.1 (2021).

resulting requirements are then multiplied by the requirements for each of the four subfields which do not require procedures to be carried out by 1.85, so that the sum of all revised clock-hour requirements expands to the required 1,500 hours.

California requires a 1,600-hour cosmetology curriculum.¹⁰⁰ That curriculum contains minimum requirements for hairstyling (65 hours and 240 procedures); waving and straightening (40 hours and 105 procedures); haircoloring and bleaching (60 hours and 50 procedures); haircutting (20 hours and 80 procedures); health and safety (200 hours); facials (25 hours and 40 procedures); eyebrow beautification and makeup (25 hours and 30 procedures); manicuring and pedicuring (10 hours and 25 procedures); and artificial nails and wraps (25 hours and 120 nail procedures).¹⁰¹ Furthermore, each of these procedures must take place within what might be called a “requirement collection” that contains a larger number of specified hours. The first four sets of requirements must sum to a minimum of 1,100 hours; the facial/eyebrow beautification/makeup requirements must sum to a minimum of 200 hours; and the manicuring/pedicuring/nails requirements must sum to a minimum of 100 hours. In order to convert procedural requirements into clock hours, this Article relies on Arkansas Department of Health cosmetology duration estimates (see Appendix A) to produce a set of clock-hour requirements. Each resultant clock-hour requirement is then multiplied by the ratio of the requirement collection’s total hours to the sum of the resultant requirements within each collection, so that the sum of all revised clock-hour requirements expands to the required 1,600 hours.

California requires a 400-hour course of study for manicurists, with 100 hours being allocated for health and safety and 300 hours allocated for nail care.¹⁰²

Colorado

Colorado requires a 1,500-hour curriculum for barbers. The state mandated hourly subfield requirements for students who began their studies on or before February 27, 2018. Students who began their studies after that date are required to have training in 10 specified subfields. The number of hours for each subfield is not specified, but each subfield’s coverage must be substantially equivalent to that of other state-approved barber curricula. In order to estimate the health and safety rating for the Colorado barber curriculum, this Article uses the subfield requirements that were in effect before February 27, 2018, given that any subsequent curricular changes or designs would necessarily result in substantial equivalence to those of other schools with curricula that

100. CAL. BUS. & PROF. CODE § 7362.5(b) (West 2021).

101. CAL. CODE REGS. tit. 16, § 950.2 (2021).

102. CAL. CODE REGS. tit. 16, § 950.4 (2021).

were compliant with the prior regulatory regime. The previous subfield requirements comprised the treatment of hair and scalp (60 hours); facial massage and treatments (90 hours); shaving (90 hours); haircutting (270 hours); hairstyling (270 hours); chemical hair services (240 hours); hair coloring and tinting (240 hours); law, rules and regulations (30 hours); management, ethics, interpersonal skills, and salesmanship (30 hours); and disinfection, cleaning, and safety (180 hours).¹⁰³

Colorado requires a 1,500-hour curriculum for cosmetologists. The state mandated hourly subfield requirements for students who began their studies on or before February 27, 2018. Students who began their studies after that date are required to have training in 13 specified subfields; the number of hours for each subfield is not specified, but each subfield's coverage must be substantially equivalent to that of other state-approved cosmetology curricula. In order to estimate the health and safety rating for the Colorado cosmetology curriculum, this Article uses the subfield requirements that were in effect before February 27, 2018, given that any subsequent curricular changes or designs would necessarily result in substantial equivalence to those of other schools with curricula that were compliant with the prior regulatory regime. The previous subfield requirements comprised scalp care (50 hours); hair coloring (200 hours); haircutting (200 hours); hairstyling (175 hours); chemical texture services (100 hours); manicuring and pedicuring (175 hours); artificial nail application (125 hours); facials and skin care (175 hours); facial makeup (25 hours); hair removal (75 hours); law, rules and regulations (25 hours); management, ethics, interpersonal skills, and salesmanship (25 hours); and disinfection, cleaning, and safety (150 hours).¹⁰⁴

Colorado requires a 600-hour curriculum for manicurists. The state mandated hourly subfield requirements for students who began their studies on or before February 27, 2018. Students who began their studies after that date are required to have training in eleven specified subfields; the number of hours for each subfield is not specified, but each subfield's coverage must be substantially equivalent to that of other state-approved manicurist curricula. In order to estimate the health and safety rating for the Colorado manicurist curriculum, this Article uses the subfield requirements that were in effect before February 27, 2018, given that any subsequent curricular changes or designs would necessarily result in substantial equivalence to those of other schools with curricula that were compliant with the prior regulatory regime. The previous subfield requirements comprised manicuring and pedicuring (210 hours); application of artificial nails (150 hours); law, rules and regulations (30 hours); management, ethics, interpersonal skills,

103. 4 COLO. CODE REGS. § 731-1-1.2(A) (LexisNexis 2021).

104. *Id.*

and salesmanship (30 hours); and disinfection, cleaning, and safety (180 hours).¹⁰⁵

Connecticut

Connecticut requires a 1,000-hour barbering curriculum. That curriculum contains minimum instructional requirements for sanitation and hygiene (35 hours); anatomy and physiology (15 hours); chemical procedures (130 hours); hair care and treatment (60 hours); skin care, facials, and manicuring (45 hours); haircutting (276 hours); hairstyling (138 hours); shaving (276 hours); business and professional relations (20 hours); and law (5 hours).¹⁰⁶

Connecticut requires a 1,500-hour hairdresser curriculum,¹⁰⁷ including the subfields of sanitation and hygiene (35 hours); anatomy and physiology (15 hours); chemical procedures (230 hours); hair care and treatment (220 hours); skin care, facials, make-up, and manicuring (150 hours); hair shaping, styling, and shaving (825 hours); business and professional relations (20 hours); and state law (5 hours).¹⁰⁸

Connecticut recently passed legislation to license and regulate manicurists that requires a 100-hour curriculum,¹⁰⁹ but, as of this writing, the state appears to impose no required hourly subfields.

Delaware

Delaware requires a 1,500-hour merged instruction and apprenticeship curriculum for barbers. That curriculum requires instruction in the history of barbering and the laws and regulations of barbering (50 hours); professional image (62.5 hours); bacteriology (100 hours); sterilization/sanitation (120 hours); implements/tools/equipment (130 hours); properties/disorders of the skin (30 hours); hair and scalp treatment (150 hours); facial massage/treatment (82.5 hours); shaving (87.5 hours); haircutting (210 hours); mustache/beard design (45 hours); permanent wave (120 hours); chemical relaxing (55 hours); hair coloring (90 hours); hairpieces (80 hours); manicuring (20 hours); electricity/light therapy (40 hours); and chemistry (10 hours).¹¹⁰

Delaware requires a 1,500-hour curriculum for

105. *Id.*

106. See *Barber School Curriculum*, CONN. ST. DEP'T PUB. HEALTH, www.portal.ct.gov/DPH/Practitioner-Licensing--Investigations/Barber/Barber-School-Curriculum [perma.cc/5J4M-FNB3] (last visited Mar. 11, 2021).

107. CONN. GEN. STAT. § 20-252 (2020).

108. See *Hairdresser School Curriculum*, CONN. ST. DEP'T PUB. HEALTH, www.portal.ct.gov/DPH/Practitioner-Licensing--Investigations/Hairdresser/Hairdresser-School-Curriculum [perma.cc/G3HZ-P3RV] (last visited Mar. 11, 2021).

109. CONN. GEN. STAT. § 20-265d (2020).

110. 5100 DEL. ADMIN. CODE § 5.0 (2021).

cosmetologists.¹¹¹ Delaware's regulations provide two sets of subfield requirements for cosmetologists — apprenticeship requirements and merged instruction and apprenticeship requirements¹¹² — but because each one of these two sets of requirements sums to roughly 3,000 hours, there is no obvious way to convert these specifications into a 1,500-hour curriculum.

Delaware requires a 300-hour course for manicurists, but does not mandate a set number of hours in any subfields.¹¹³

District of Columbia

The District of Columbia generally requires a 1,500-hour barbering curriculum, including the subfields of manicuring/pedicuring (50 hours); pressing (100 hours); waving/styling (100 hours); braiding (35 hours); shampooing (40 hours); permanent wave (150 hours); wet curls (100 hours); facials (50 hours); scalp treatments (25 hours); dye/bleach (100 hours); haircutting (100 hours); hairpieces (25 hours); chemical straightening (225 hours); electrology (75 hours); personal hygiene (50 hours); ethics/salesmanship (25 hours); courtesy/conduct/law (50 hours); anatomy/physiology/bacteriology/pathology/chemistry/electricity (150 hours); and sanitation (50 hours).¹¹⁴ Applicants for a barbering license may instead supply evidence of 1,500 hours of alternate training and experience to the Board of Barber and Cosmetology;¹¹⁵ however, for the purposes of this Article, this alternative system of licensing is not taken into account.

The District of Columbia requires a 1,500-hour cosmetology operator curriculum, including the subfields of manicuring/pedicuring (50 hours); pressing (100 hours); croquinole waving/styling (100 hours); braiding (35 hours); shampooing (40 hours); permanent wave (150 hours); wet curls (100 hours); facials/massage (50 hours); scalp treatments (25 hours); dye and bleach (100 hours); haircutting (100 hours); hairpieces (25 hours); chemical straightening (225 hours); electrology (75 hours); personal hygiene (50 hours); ethics/salesmanship (50 hours); courtesy/conduct/law (50 hours); anatomy and other sciences (150 hours); and sanitation (50 hours).¹¹⁶

The District of Columbia requires a 350-hour course of study for manicurists, broken down into the following subfields: manicuring and pedicuring with water and oil (100 hours); pedicure (25 hours); personal hygiene (25 hours); ethics and salesmanship (25 hours); courtesy, conduct, law, and communication skills (35 hours); anatomy and physiology (25 hours); bacteriology and

111. DEL. CODE ANN. tit. 24, § 5107 (2020).

112. 5100 DEL. ADMIN. CODE § 4.0 (2021).

113. 5100 DEL. ADMIN. CODE § 14.0 (2021).

114. D.C. MUN. REGS. tit. 17, § 3703.5 (2021).

115. *Id.*; D.C. MUN. REGS. tit. 17, § 3703.6 (2021).

116. D.C. MUN. REGS. tit. 17, § 3703.2 (2021).

pathology (30 hours); chemistry (35 hours); electricity (20 hours); and sanitation (30 hours).¹¹⁷

Florida

Florida mandates 900 hours of barber training in “sanitation, safety, and laws and rules,” broken down into the following subfields: laws and rules (225 hours); safety, sanitization, and sterilization (270 hours); hair structure and chemistry (90 hours); haircutting (135 hours); shampooing (45 hours); chemical services (90 hours); and shaving and beard/mustache trimming (45 hours).¹¹⁸

Florida requires a curriculum of 1,200 hours for cosmetologists.¹¹⁹ That curriculum contains hourly requirements for the following cosmetology subfields: laws and rules (5 hours); HIV and AIDS (4 hours); sanitation (10 hours); ethics (2 hours); basics of electricity (8 hours); facial techniques and contraindications (66 hours); product chemistry (8 hours); hair removal (2.5 hours); makeup (2 hours); and skin theory, skin disease, and skin disorders (85 hours). It also contains performance requirements for facials (10 services); hair shaping (75 services); scalp treatments (45 services); shampoos and rinses (50 services); hairstyling (300 services); hair coloring (45 services); waving/relaxing/straightening (65 services); and manicuring/pedicuring/nail extensions (20 services).¹²⁰ In order to convert procedural requirements into clock hours, this Article relies on Arkansas Department of Health cosmetology duration estimates (see Appendix A) to produce a set of clock-hour requirements, which (when added to the specified hourly requirements) sum to slightly over 1,105 hours. Because this method did not provide any clock hours for the legal requirements of either health/safety instruction or law/rules instruction (both of which are required parts of the curriculum), those two fields are assigned the remaining hours of instruction that Florida requires, which is slightly under 95 hours.

Florida requires a curriculum of 180 hours for manicurists. That course must be divided among the following subfields: laws and rules (4 hours); sanitation (8 hours); ethics (2 hours); nail theory and practice, including disorders and diseases (76 hours); manicures (15 hours); pedicures (10 hours); tips with overlay (15 hours); sculpting (10 hours); mail wraps and mending (10 hours); nail fill-ins (10 hours); artificial nail removal (5 hours); gel nails (5 hours); and polishing and nail art (10 hours).¹²¹

117. D.C. MUN. REGS. tit. 17, § 3703.12 (2021).

118. FLA. ADMIN. CODE ANN. r. 61G3-16.001 (2021).

119. FLA. STAT. § 477.019 (2021).

120. FLA. ADMIN. CODE ANN. r. 61G5-22 (2021).

121. FLA. ADMIN. CODE ANN. r. 61G5-22.016.

Georgia

Georgia requires a 1,500-hour barber curriculum. The curriculum contains requirements for the following subfields: classroom theory — including sanitation, hygiene, and laws and rules (50 hours); hair and scalp treatments, shampooing, and conditioning (25 hours); shaving (25 hours); hair coloring (25 hours); haircutting and styling (70 hours); facial hair design and waxing (20 hours); permanent waving, relaxing, and chemical application (65 hours); advanced theory (200 hours); advanced hairstyling techniques and cutting (500 hours); advanced shaving (25 hours); advanced shampooing (5 hours); advanced facial hair design and waxing (10 hours); advanced scalp treatment techniques (10 hours); advanced permanent waving, relaxing, and chemical application (270 hours); and unassigned hours (200 hours).¹²²

Georgia requires a curriculum of 1,500 hours for cosmetologists.¹²³ That curriculum contains hourly requirements for the following “Level 1” cosmetology subfields: theory (40 hours); theory of permanent waving (45 hours); theory of hair coloring (45 hours); theory of hair and scalp treatments and conditioning (20 hours); theory of haircutting (25 hours); theory of shampooing (15 hours); theory of hairdressing (35 hours); and theory of nail care and skin care (25 hours). That curriculum also contains hourly requirements for the following “Level 2” cosmetology subfields: theory (100 hours); social skills, etc. (50 hours); laboratory (50 hours); hairdressing, shampoo, and comb-out (255 hours); haircutting and shaping (124.5 hours); permanent waving (150 hours); chemical hair relaxing (139 hours); hair coloring and lightening (155 hours); scalp and hair treatment (49 hours); facial treatment/makeup/hair removal (52.5 hours); hair removal (30 hours); sanitizing and disinfection (5 hours); and manicures, pedicures, and nail sculpting (90 hours).¹²⁴

Georgia requires a 525-hour curriculum for manicurists which includes the following subfields: Georgia theory, which includes sanitation and science (140 hours); sanitizing and disinfection of tools (5 hours); manicure and massage (70 hours); pedicure and massage (60 hours); nail sculpting (60 hours); artificial tips and overlay (60 hours); nail wrapping (20 hours); UV gel nails (20 hours); fill-in application (40 hours); artificial nail removal and nail repair (10 hours); nail drill usage (5 hours); nail art (5 hours); airbrush nail art (5 hours); paraffin treatments on the hands and feet (5 hours); and advanced techniques (20 hours).¹²⁵

Hawaii

Hawaii mandates a barber curriculum of at least 1,500 hours,

122. GA. COMP. R. & REGS. 70-3-.02 (2021).

123. GA. CODE ANN. § 43-10-9 (2020).

124. GA. COMP. R. & REGS. 240-15-.02 (2021).

125. GA. COMP. R. & REGS. 240-17-.02 (2021).

with ranged requirements for multiple subfields. This Article for the most part uses the average of the minimum and maximum ranged requirements for its calculations, except that it adjusts the hours for the haircutting and hairstyling category to meet the 1,500-hour requirement. Those adjusted hourly requirements include theory, including laws, barber history, sanitation, hairstyling, product knowledge, facials, and shampooing (250 hours); haircutting and hairstyling (747.5 hours); hair coloring, relaxing, and bleaching (102.5 hours); permanent waving (132.5 hours); shampooing and conditioning (75 hours); shaving, mustache and beard trims (35 hours); facials (20 hours); scalp treatments (10 hours); sales and shop management (52.5 hours); and shop sanitation and sterilization (75 hours).¹²⁶

Hawaii requires a curriculum of 1,800 hours for cosmetologists. That curriculum contains hourly requirements for the following subfields: theory (200 hours); manicuring and pedicuring (150 hours); scalp and hair treatment (50 hours); facials and makeup (175 hours); hairdressing/shampooing (350 hours); permanent waving (175 hours); haircoloring and bleaching (150 hours); haircutting and shaping (150 hours); management/maintenance/laboratory (100 hours); hair straightening (50 hours); and “unassigned” (250 hours).¹²⁷

Hawaii requires a 350-hour curriculum for manicurists, divided into the following subfields: anatomy, chemistry, product knowledge, and sanitation (100 hours); management (50 hours); unassigned (50 hours); and manicuring and pedicuring (150 hours).¹²⁸

Idaho

Idaho mandates a 900-hour course of study for barbers. The state specifies the following subjects must be covered during this course of study but does not mandate a specific number of hours for each subject: haircut, blow dry, shampoo, shave and beard trim, facial, hair and scalp treatment, and curling iron. In addition, hygiene and disinfection must be taught on a continuing basis.¹²⁹

Idaho requires a cosmetology curriculum of 1,600 hours.¹³⁰ It requires the inclusion of roughly 20 subfields of cosmetology but does not specify particular hourly requirements for those subfields. Idaho requires a 400-hour curriculum for manicurists but does not specify hourly requirements for its subfields.¹³¹

126. HAW. CODE R. § 16-73 (LexisNexis 2021) (Exhibit A).

127. *Amendment and Compilation of Chapter 16-78, Hawaii Administrative Rules*, HAW. DEPT COM. & CONSUMER AFF. (Jan. 5, 2005), at C-1 and C-2, www.cca.hawaii.gov/pvl/files/2013/08/har_78-c21.pdf [perma.cc/6JGS-NANY].

128. *Id.*

129. IDAHO ADMIN. CODE r. 24.28.01.502.01 (2021).

130. IDAHO CODE ANN. § 54-5810(2)(c)(i) (2021).

131. IDAHO ADMIN. CODE r. 24.28.01.502.05 (2021).

Illinois

Illinois mandates a barber curriculum of 1,500 hours. The state requires that the following subjects be taught but does not specify hours for each: basic training in things like barber history, bacteriology, infection control and safe work practices, anatomy and physiology, chemistry, and sanitary standards; shaving and facial hair design; haircutting and styling; chemical texture services; barbershop management, including employment and labor law; and the workers' compensation act.¹³²

Illinois requires a minimum cosmetology curriculum of 1,500 hours.¹³³ That curriculum requires instruction in seven separate cosmetology fields, most of which are broken down into subfields. Those seven fields are basic training (150 hours); practical chemical application/hair treatment (500 hours); hairstyling/hairstyling (475 hours); shop management, sanitation, and interpersonal relations (200 hours); esthetics (85 hours); nail technology (55 hours); and electives (35 hours).¹³⁴

Illinois requires a 350-hour curriculum for manicurists which includes the following subfields: history, hygiene, ethics, sterilization, bacteriology, and nails (50 hours); science, massage, and people skills (15 hours); practices and procedures (255 hours); and business practices (30 hours).¹³⁵

Indiana

Indiana mandates a 1,500-hour barber curriculum, with requirements for the following subfields: sanitation, bacteriology, and sterilization (40 hours); laws and rules (20 hours); salesmanship (15 hours); management (10 hours); skin (10 hours); hair (10 hours); facials (45 hours); hairstyling (225 hours); light therapy (10 hours); chemistry (10 hours); shampoo/massage (70 hours); scalp treatment (35 hours); history of barbering (10 hours); shaving/shampooing (45 hours); honing and stropping (15 hours); personal hygiene and professional ethics (10 hours); equipment care (10 hours); hair coloring (130 hours); permanent waving and chemical relaxing (265 hours); haircuts (300 hours); anatomy and physiology (15 hours); hairpieces (50 hours); and discretionary hours (150 hours).¹³⁶

Indiana requires a cosmetology curriculum of 1,500 hours. That curriculum requires instruction in haircutting (275 hours); sanitation (40 hours); statutes and rules (10 hours); salesmanship (10 hours); management (10 hours); manicuring (30 hours); pedicuring (20 hours); hair removal (15 hours); anatomy and physiology (5 hours); skin (5 hours); hair (5 hours); electricity (5

132. ILL. ADMIN. CODE tit. 68, § 1175.330 (2021).

133. 225 ILL. COMP. STAT. 410/3-2 (2021).

134. ILL. ADMIN. CODE tit. 68, § 1175.530 (2021).

135. ILL. ADMIN. CODE tit. 68, § 1175.1135 (2021).

136. 820 IND. ADMIN. CODE 8-2-8 (2021).

hours); chemistry (10 hours); shampooing (35 hours); scalp performances (20 hours); facials and makeup (65 hours); hair coloring (190 hours); texture services (320 hours); hairstyling (280 hours); and “discretionary hours” (150 hours).¹³⁷

Indiana requires manicurists to complete a 450-hour curriculum with the following subfields: sanitation (40 hours); anatomy and disorders (25 hours); statutes and rules (10 hours); nail techniques, including tops, sculptures, overlays, fiberglass, and gels (190 hours); manicures (60 hours); pedicures (35 hours); chemistry (10 hours); salesmanship (15 hours); electric drill and file (20 hours); and discretionary (45 hours).¹³⁸

Iowa

Iowa requires a 2,100-hour barber curriculum, with 1,675 hours in supervised practical instruction; 380 hours in demonstrations and lectures covering subjects such as law, ethics, economics, equipment, shop management, history of barbering, sanitation, sterilization, personal hygiene, first aid, haircutting, bacteriology, anatomy, and scalp care; and 45 hours in lectures covering tax consulting, advertising, insurance, business management, salesmanship and barbering.¹³⁹

Iowa requires a cosmetology curriculum of 2,100 hours.¹⁴⁰ That curriculum includes core life sciences (150 hours); cosmetology theory (including business and management related to the practice of cosmetology) (615 hours); and applied practical instruction (1,335 hours).¹⁴¹ In order to estimate the health and safety rating for some of these categories, this Article uses figures based on the average for multiple specified cosmetology subfields.

Iowa requires a 325-hour curriculum for manicurists that includes core life sciences (150 hours), nail technology (50 hours), and applied practical instruction (125 hours).¹⁴²

Kansas

Kansas requires a 1,200-hour course for barbers. This course must include the following subfields: scientific fundamentals of barbering (150 hours); histology of hair and skin (10 hours); anatomy (10 hours); skin, scalp, and hair (10 hours); electricity (2 hours); sterilization and antiseptics/chemistry (10 hours); chemistry (2 hours); sanitation and sterilization (20 hours); hygiene and first aid (5 hours); bacteriology (5 hours); scalp and shampoo (35 hours); instruments (5 hours); economics, equipment, and management (15 hours); history of barbering (5 hours); singeing

137. 820 IND. ADMIN. CODE 4-4-4 (2021).

138. 820 IND. ADMIN. CODE 4-4-5 (2021).

139. IOWA ADMIN. CODE r. 645-23.8(158) (2021).

140. IOWA CODE § 157.10 (2020).

141. IOWA ADMIN. CODE r. 645-61.13(157) (2021).

142. IOWA ADMIN. CODE r. 645-61.14(157) (2021).

and hair tonics (2 hours); soaps, shampoos, and tonics (5 hours); facial massage (25 hours); honing and stropping (2 hours); shaving (120 hours); haircutting (625 hours); hairstyling and arrangement (40 hours); permanent waving (30 hours); coloring (42 hours); and law and ethics (25 hours).¹⁴³

Kansas requires 1,500 hours of cosmetology training.¹⁴⁴ That curriculum requires instruction in sanitation (40 hours); hair and scalp (35 hours); skin (20 hours); nails (20 hours); shampoos and rinses (35 hours); scalp and hair care (35 hours); facials and makeup (150 hours); manicuring (180 hours); hair coloring (175 hours); chemical waving (150 hours); hair relaxing (125 hours); hair shaping (150 hours); hairstyling (125 hours); thermal techniques (75 hours); hairpiece styling (10 hours); business practices (75 hours); state law (50 hours); and specific student needs (50 hours).¹⁴⁵

Kansas requires a 350-hour curriculum for manicurists that includes scientific concepts (60 hours), manicuring skills (75 hours), artificial nails (160 hours), business practices (35 hours), and state law (20 hours).¹⁴⁶

Kentucky

Kentucky mandates a curriculum of 1,500 hours for barbers. The state requires these subfields: instruments (30 hours); shaving instructions (100 hours); haircutting for men, women, and children (935 hours); shampooing (40 hours); permanent waving (40 hours); hair coloring (40 hours); hair straightening and relaxing (40 hours); massaging (35 hours); scalp and skin diseases (20 hours); physiology and anatomy of the head, face, and neck (100 hours); sterilization and sanitation (40 hours); hygiene (10 hours); bacteriology (20 hours); electricity (10 hours); pharmacology (20 hours); psychology (10 hours); and history, professional ethics, and other information (10 hours).¹⁴⁷

Kentucky requires a cosmetology curriculum of 1,500 hours. That curriculum requires instruction in science and theory (375 hours); care of the hair, skin, and nails (1,085 hours); and statutes and regulations (40 hours). In order to estimate the health and safety rating for some of these categories, this Article uses figures based on the average for multiple specified cosmetology subfields.¹⁴⁸

Kentucky requires a curriculum of 450 hours for manicurists which includes: science and theory (150 hours), laws and regulations (25 hours), and clinic and practice hours (275 hours).¹⁴⁹

143. KAN. ADMIN. REGS. § 61-3-3 (2021).

144. KAN. STAT. ANN. § 65-1905 (2021).

145. KAN. ADMIN. REGS. § 69-3-8 (2021).

146. *Id.*

147. 201 KY. ADMIN. REGS. 14:090 (2021).

148. 201 KY. ADMIN. REGS. 12:082, § 3 (2021).

149. 201 KY. ADMIN. REGS. 12:082, § 7 (2021).

Louisiana

Louisiana mandates a course of study of 1,500 hours for barbers. The state requires the following subfields, but does not specify hours for each: introduction to barbering, including the history of barbering, shop safety hazards, and professional ethics; Louisiana laws and regulations, barbering implements, including sanitation of them; sanitation and safety; shampooing, taper haircuts; men's haircutting; women's haircutting; shaving; massage and facials; skin and scalp; hair; chemicals; chemistry; anatomy and physiology; shop management and salesmanship; and employment preparation.¹⁵⁰

Louisiana requires a 1,500-hour curriculum for cosmetologists;¹⁵¹ although that curriculum specifies various subfields, it does not require any particular allotment of hours for any particular subfield.

Louisiana requires a 500-hour curriculum for manicurists, but has no hourly subfield requirements.¹⁵²

Maine

Maine mandates a 1,500-hour course of study for barbers and recommends the following number of hours for these subfields: bacteriology, hygiene, infection prevention, sanitation (35 hours); general sciences (85 hours); business and salon management (115 hours); barbering practice equipment (25 hours); haircutting principles and techniques (500 hours); hairstyling (105 hours); permanent waving, hair coloring, tinting, bleaching, and chemical straightening (445 hours); shampooing and scalp care (40 hours); trimming beards and mustaches and shaving (90 hours); manicuring (40 hours); and hairpieces (20 hours).¹⁵³

Maine requires a 1,500-hour curriculum for cosmetologists. That curriculum requires instruction in science and sterilization (35 hours); the sciences generally (85 hours); management (80 hours); chemical texture services (225 hours); the use of equipment (25 hours); hair coloring (285 hours); haircutting (300 hours); hairstyling (225 hours); nail technology (80 hours); shampooing and scalp care (40 hours); skin care (100 hours); and wiggyery (20 hours).¹⁵⁴

Maine requires a curriculum of 200 hours for manicurists. This curriculum must include these subfields: bacteriology, hygiene, disinfection, etc. (30 hours); general science, which includes anatomy, physiology, nail structure, etc. (20 hours); equipment and tools safety (10 hours); nail technology, including artificial nails (65 hours);

150. LA. ADMIN. CODE tit. 46, § 1301 (2021).

151. LA. ADMIN. CODE tit. 46, § 301 (2021).

152. LA. ADMIN. CODE tit. 46, § 305 (2021).

153. 02-041-027 ME. CODE R. § 19 (LexisNexis 2021).

154. Office of Professional and Occupational Regulation, Chapter 27, Subchapter 3.

pedicuring (55 hours); and management, law, and electives (20 hours).¹⁵⁵

Maryland

Maryland requires a course of study of 1,200 hours for barbers. That course must include the following subfields: history of barbering (6 hours); professional image (18 hours); implements and tools (40 hours); men's haircutting and styling (452 hours); treatment of hair and scalp (37 hours); men's hair replacement (32 hours); men's facial massage and treatment (32 hours); shaving and facial design (70 hours); microbiology/chemistry (49 hours); infection control and safe work practices (60 hours); anatomy and physiology (27 hours); electricity and light therapy (23 hours); properties and disorders of the skin (40 hours); properties and disorders of the scalp and hair (40 hours); women's haircutting and styling (36 hours); chemical texture service (57 hours); hair color and lightening (60 hours); nails and manicuring (28 hours); state board preparations and licensing laws (37 hours); job search (36 hours); barbershop management (17 hours); and career education and study skills (3 hours).¹⁵⁶

Maryland, which requires a 1,500-hour cosmetologist curriculum,¹⁵⁷ provides a "cosmetology curriculum guideline" with the following breakdown: orientation (4 hours); professional image (3 hours); bacteriology and AIDS awareness (8.5 hours); sterilization and sanitation (60.5 hours); properties of the hair and scalp (38.5 hours); draping (28.5 hours); shampooing/rinsing/conditioning (57 hours); hair shaping (154.5 hours); finger waving (84.5 hours); wet hairstyling (109.5 hours); thermal hairstyling (130.5 hours); thermal straightening (79.5 hours); permanent waving (184.5 hours); hair coloring (159 hours); soft curl perm and chemical relaxing (124.5 hours); artificial hair (23.5 hours); manicuring and pedicuring (54.5 hours); the nail and nail disorders (8.5 hours); theory of massage (20 hours); facials (24.5 hours); facial makeup (34.5 hours); skin and skin disorders (8.5 hours); hair removal (19 hours); cells/anatomy/physiology (35.5 hours); electricity and light therapy (16 hours); chemistry (16.5 hours); salon business (8.5 hours); first aid (2 hours); and interviews/employment/taxes (2 hours).¹⁵⁸

Maryland requires a curriculum of 250 hours for manicurists. That curriculum must include these subfields: orientation (4 hours); anatomy and physiology, including bacteriology, nail disorders and

155. 02-041-027 ME. CODE R. § 19.

156. MD. CODE ANN., BUS. OCC. & PROF. § 4-302 (LexisNexis 2021); email from Nicole Fletcher, Maryland Board of Barbers and Cosmetologists, July 22, 2019.

157. MD. CODE ANN., BUS. OCC. & PROF. § 5-304 (LexisNexis 2021).

158. Maryland State Board of Cosmetology, "Cosmetology Curriculum Guideline."

diseases, and skin disorders and diseases (36 hours); sanitation and sterilization (17 hours); equipment (10 hours); manicure, pedicure, and massage (30 hours); artificial nails (100 hours); new products and techniques (40 hours); professional ethics and state regulations (5 hours); business practices (8 hours); hygiene and personal grooming (3 hours); safety precautions and procedures (12 hours); and state laws and regulations (5 hours).¹⁵⁹

Massachusetts

Massachusetts mandates a 1,000-hour barber curriculum. It mandates that this course cover these subfields: cleaning and disinfection (80 hours), shampooing (10 hours), haircutting and styling (400 hours), hair coloring (75 hours), permanent waving (90 hours), chemical relaxing (40 hours), scalp manipulations and treatments (15 hours), shaving (50 hours), honing and stropping (10 hours), mustache and beards (20 hours), facials (20 hours), light therapy (5 hours), shop management (20 hours), and theory (165 hours).¹⁶⁰

Massachusetts requires a 1,000-hour cosmetology curriculum.¹⁶¹ That curriculum requires instruction in manicuring (50 hours); hair straightening and permanent waving (250 hours); shampooing (25 hours); finger waving (50 hours); marcelling and all iron curls (45 hours); skin care/facial grooming (80 hours); wig instruction and scalp treatments (50 hours); dyes and bleaching (150 hours); haircutting (125 hours); tests on sterilization, hygiene, and anatomy (125 hours); instruction and lecture on sanitation (25 hours); and ethics, salesmanship, courtesy, and conduct (25 hours).¹⁶² However, Massachusetts's 1,000-hour requirement arguably understates the training requirements for licensing in that state, because — in addition to the 1,000-hour requirement — receipt of a license also requires the potential licensee to work under the supervision of a licensed cosmetologist for two years. In this Article, the two-year supervision requirement was not generally included in calculations of training requirements.

Massachusetts requires a curriculum of 100 hours for manicurists that contains the following subfields: safety and sanitation (10 hours); artificial nails (25 hours); first aid (2.5 hours); basic manicuring with arm massage (40 hours); ethics, management, and law (12.5 hours); and hygiene and anatomy (10 hours).¹⁶³

159. MD. CODE REGS. 13A.04.19.03 (2021); email from Nicole Fletcher, Maryland Board of Barbers and Cosmetologists, July 17, 2019.

160. 240 MASS. CODE REGS. 8.03 (2021).

161. 240 MASS. CODE REGS. 2.01 (2021).

162. 240 MASS. CODE REGS. 4.04 (2021).

163. 240 MASS. CODE REGS. 7.07 (2021).

Michigan

Michigan mandates a course of study of 2,000 hours for barbering, divided into these subfields: history of barbering and the implements of the profession (10 hours); safety and sanitation (110 hours); client services (30 hours); haircuts and shaving (1,060 hours); chemical services (395 hours); secondary services such as hair and scalp treatments, skin care, and selling and servicing hairpieces (270 hours); laws, rules, and regulations (10 hours); and business management (115 hours).¹⁶⁴

Michigan requires a 1,500-hour cosmetology curriculum, breaking down its requirements into multiple subfields: sanitation/patron protection/laws, rules/personal hygiene/salon management/mechanical and electrical safety (130 hours); facials/skin analysis and care/manipulation, massage, and electricity/removal of hair by the use of wax, tweezers, or depilatories/makeup and eyebrow arch (115 hours); hairdressing/arranging, cutting, dressing, curling, pressing, artificial hair, finger waving, natural hair cultivation (525 hours); scalp and hair treatments (25 hours); hair coloring/temporary and semipermanent/permanent bleaching and dimensional coloring/color mixing (210 hours); chemical hair restructuring/permanent waving/straightening and relaxing (220 hours); applied chemistry/occupational safety and health administration as applied to skin, hair, nails, and scalp (30 hours); applied anatomy, physiology, and histology of the human head, hands, nails, skin and hair (45 hours); manicuring and pedicuring (70 hours); artificial nails (20 hours); and unassigned additional hours (110 hours).¹⁶⁵

Michigan requires a 400-hour curriculum for manicurists that contains sanitation (50 hours); anatomy and disorders (25 hours); art principles (10 hours); manicuring and pedicuring (20 hours); chemistry and safety (15 hours); artificial nails (25 hours); sanitation (50 hours); manicuring and pedicuring (50 hours); artificial nails (105 hours); and unassigned (50 hours).¹⁶⁶

Minnesota

Minnesota requires 1,500 hours for its barbering course of study.¹⁶⁷ According to the state, “The course of instruction must include the following subjects: scientific fundamentals for barbering; hygiene; practical study of the hair, skin, muscles, and nerves; structure of the head, face, and neck; elementary chemistry relating to sterilization and antiseptics; diseases of the skin, hair, and glands; massaging and manipulating the muscles of the face and neck; haircutting; shaving; trimming the beard; bleaching,

164. MICH. ADMIN. CODE r. 339.6047 (2021).

165. MICH. ADMIN. CODE r. 338.2161 (2021).

166. MICH. ADMIN. CODE r. 338.2162 (2021).

167. MINN. R. 2100.6000 (2021).

tinting and dyeing the hair; and the chemical straightening of hair.”

Minnesota requires a 1,550-hour cosmetology curriculum,¹⁶⁸ breaking down its requirements into multiple subfields: shampooing (50 hours); scalp and hair conditioning (80 hours); hair design shaping (150 hours); chemical hair control (including relaxing) (200 hours); hair coloring (100 hours); hairstyling (200 hours); facials and makeup (200 hours); manicures (including artificial nails) (150 hours); and 420 hours in “related theory and lecture,” which will necessarily include 240 hours of preclinical instruction in the sciences of anatomy, dermatology, trichology, manicuring, and chemistry as related to cosmetology; electricity and light; sanitation; safety procedures related to the practice of cosmetology; and Minnesota statutes and rules that pertain to the regulation of the practice of cosmetology; and elementary service skills.¹⁶⁹

Minnesota requires a 350-hour curriculum for manicurists, including these subfields: preclinical instruction (50 hours); nails and artificial nails (unspecified hours); applied science and skills, including manicures, artificial nails, and sculpture (200 hours); and business practices and laws (unspecified hours). Because some hourly assignments of these subfields are specified and some are not, this Article assumes that the two subfield assignments could appropriately be assigned 50 hours each, and then that the remaining 50 hours could be evenly split among the four subfield groups.¹⁷⁰

Mississippi

Mississippi requires a 1,500-hour course of study for barbering. It requires the following hours for the theory portion of the course: history fundamentals of barbering (5 hours); chemistry relating to sterilization (25 hours); barber implements (5 hours); male hairpieces (5 hours); hair coloring (5 hours); hair structure and chemicals (75 hours); theory of massage and facial treatments (5 hours); disorders of the skin, scalp, and hair (10 hours); barber laws and regulations (5 hours); business management and salesmanship (10 hours), and general review (20 hours). Mississippi also recommends the following number of hours for various procedures: haircutting (900 hours); shaving (25 hours); hair coloring (70 hours); scalp, hair treatment, and shampoo (50 hours); facials (20 hours); razor and styling (50 hours); wiggery (20 hours); and unassigned (195 hours).¹⁷¹

Mississippi requires a 1,500-hour curriculum for cosmetologists;¹⁷² although that curriculum specifies various

168. MINN. R. 2105.0145 (2021).

169. MINN. R. 2110.0500 (2021).

170. MINN. R. 2110.0530 (2021).

171. 30-4 MISS. CODE R. § 1801-4.2 (LexisNexis 2021).

172. MISS. CODE ANN. § 73-7-13 (2021).

subfields, it does not require any particular allotment of hours for any particular subfield.

Mississippi requires a 350-hour curriculum for manicurists, including theory (85 hours), skill and practice (250 hours), and unassigned (15 hours).¹⁷³

Missouri

Missouri requires that barber schools provide 1,000 hours of training in the following subjects: history (5 hours); professional image (5 hours); bacteriology (5 hours); sterilization and sanitation (20 hours); implements, tools, and equipment (15 hours); properties and disorders of the skin, hair, and scalp (15 hours); treatment of hair and scalp (20 hours); facial massage and treatments (5 hours); shaving (35 hours); haircutting (425 hours); hairstyling (325 hours); mustache and beard design (5 hours); permanent waving (30 hours); chemical hair relaxing and soft curl permanents (30 hours); hair coloring (30 hours); hairpieces (5 hours); chemistry (5 hours); anatomy and physiology (5 hours); salesmanship and establishment management (5 hours); and state law (10 hours).¹⁷⁴

Missouri requires a 1,500-hour cosmetology curriculum,¹⁷⁵ breaking down its requirements into multiple subfields: shampooing (40 hours); hair coloring, bleaches and rinses (130 hours); haircutting and shaping (130 hours); permanent waving and relaxing (125 hours); hair setting, pin curls, finger waves, thermal curling (225 hours); comb-outs and hairstyling techniques (105 hours); scalp treatments and diseases (30 hours); facials, eyebrows, and arches (40 hours); manicuring, hand/arm massages, and treatment of nails (110 hours); cosmetic chemistry (25 hours); salesmanship and management (10 hours); sanitation and sterilization (30 hours); anatomy (20 hours); state law (10 hours); and miscellaneous lectures/test review (470 hours).¹⁷⁶

Missouri requires a 400-hour curriculum for manicurists that includes manicuring, massage, and nail treatments (220 hours); salesmanship and management (20 hours); sanitation and sterilization (20 hours); anatomy (10 hours); law (10 hours); use of chemicals (40 hours); and unspecified (80 hours).¹⁷⁷

Montana

Montana requires 1,100 hours of barber training. The curriculum must include haircutting (185 hours); shampoo, scalp treatment, and hairy styling (165 hours); skin care (45 hours); chemical services (255 hours); chemistry, bacteriology, sanitation, sterilization, safety, anatomy, and diseases of the skin, hair and

173. 30-5 MISS. CODE R. § 2101-5.18(B) (LexisNexis 2021).

174. MO. CODE REGS. ANN. tit. 20, § 2085-12.030 (2021).

175. MO. ANN. STAT. § 329.050 (West 2021).

176. MO. ANN. STAT. § 329.040 (West 2021).

177. *Id.*

scalp (60 hours); shop management, facility sanitation and cleanliness, business methods, ethics (75 hours); and discretionary hours (275 hours).¹⁷⁸

Montana requires a 1,500-hour cosmetology curriculum,¹⁷⁹ breaking down its requirements into multiple subfields as follows: manicuring (95 hours); esthetics (110 hours); shampoo (including scalp treatment) and hairstyling (including braiding and thermal curling) (195 hours); chemical services and hair coloring (395 hours); haircutting (155 hours); salon management, sanitation and cleanliness, business methods, customer service, professional ethics, and laws and rules (115 hours); and sciences, sterilization, and diseases of the hair, scalp, skin, and nails (60 hours), as well as discretionary instruction (375 hours).¹⁸⁰

Montana requires a 400-hour curriculum for manicurists that includes management, sanitation, business methods, rules and law (60 hours); sanitation, sciences, diseases, and disorders (55 hours); manicures, pedicures, polish, and implements (35 hours); electric nail file use (10 hours); liquids and powder enhancements, tips, wraps, gels, and art (140 hours); and discretionary (100 hours).¹⁸¹

Nebraska

Nebraska requires 1,800 hours of training for barbers,¹⁸² divided into three sets of requirements. The state mandates a 300-hour class of theory and supervised practice in these areas: laws and rules and regulations for barbering; history of barbering; barber equipment and product knowledge, its uses and safety precautions; sanitation, sterilization, hygiene and first aid; haircutting, long and tapered styles, haircutting techniques and braiding; shaving, honing and stropping; scalp care, treatments and shampooing; facials, massages and packs; coloring, bleaching and rinsing; chemical waving and relaxing; natural and artificial nail care; and waxing. Furthermore, the state requires each student to perform 150 haircuts, 75 shampoo services, 10 shaves, 10 beard trims, 24 facials, 24 chemical waves, 90 perm rod rollings, 10 braidings, 20 hair colorings, and 6 bleachings/highlightings; in order to convert procedural requirements into clock hours, this Article relies on Arkansas Department of Health cosmetology duration estimates (see Appendix A) to produce a set of clock-hour requirements. Finally, another set of theory classes appears to be required that contains instruction on law, rules, and regulations; equipment, products, and safety; management, ethics, and economics; sanitation and sterilization; bacteriology; electricity; and hairpieces. Because the first set of requirements fills 300 hours and

178. MONT. ADMIN. R. 24.121.807 (2021).

179. MONT. ADMIN. R. 24.121.601 (2021).

180. *Id.* R. 24.121.807.

181. *Id.* R. 24.121.807(7).

182. NEB. REV. STAT. § 71-208 (2021).

the second set of requirements translates to 303 hours, this Article assumes that the third set could plausibly fill 294 hours; it also assumes a doubling of the time devoted to all three sets of requirements so as to consume Nebraska's required 1,800 hours.¹⁸³

Nebraska requires a 1,800-hour cosmetology curriculum.¹⁸⁴ In 2020, it broke down its requirements as follows: two 200-hour units of theoretical training (for a total of 400 hours) in ten fields (chemical texturizing services, haircutting, hairstyling, hair coloring, shampoos/conditioners/scalp treatments, general sciences, facials and body services, hair removal, nail services, and Nebraska law), followed by advanced clinical training in chemical texturizing (200 hours), haircutting (300 hours), hairstyling (200 hours), hair coloring (300 hours), shampoos/conditioners/scalp treatments (5 hours), facials and body services (60 hours), hair removal (30 hours), nail services (50 hours), and infection control (20 hours). With respect to the 400 hours of theoretical training, this Article assumes 10 equal portions of 40 hours of training in 10 different subfields; in the cases in which different subfields required training in infection control, this Article treats infection control as a separate category with its own health and safety rating. In 2018, Nebraska reduced its total hourly requirements in cosmetology to 1,800 hours;¹⁸⁵ between 2018 and 2020, it transformed its requirements into three multi-subfield curricular units.¹⁸⁶ This Article does not rely on Nebraska's pre-2020 cosmetology requirements for its analysis.

Nebraska requires a 300-hour curriculum for manicurists. That course must include the following subfields: Nebraska theory (75 hours), consisting of training in client consultation, infection control and disinfection, salon safety, first aid, bacteria and other infectious agents, anatomy and physiology, nail and skin disorders and diseases, chemistry and electricity, manicures, pedicures, nail enhancements, filing techniques, and salon business; artificial nails — wraps (9 hours); artificial nails — acrylic (45 hours); artificial nails — gel (36 hours); artificial nails — dips (36 hours); manual filing (1.8 hour); electric nail drill filing (25.2 hours); wrap repair and maintenance (9 hours); acrylic repair and maintenance (27 hours); gel repair and maintenance (27 hours); dip repair and maintenance (9 hours); manicure (9 hours); and pedicure (18 hours).¹⁸⁷

183. 51 NEB. ADMIN. CODE § 002-004 (2021).

184. See *Cosmetology, Esthetic, and Nail Technology Schools, Satellite Classrooms, and Apprentice Salons*, NEB. DEP'T HEALTH & HUM. SERVICES (Jun. 20, 2020), www.nebraska.gov/rules-and-regs/regsearch/Rules/Health_and_Human_Services_System/Title-172/Chapter-037.pdf [perma.cc/ZX6J-T4RX].

185. LB 731 of 2018.

186. See *Memorandum*, NEB. DEP'T HEALTH & HUM. SERVICES (May 29, 2018), www.dhhs.ne.gov/licensure/Documents/COSIMemo2018LawChanges.pdf [perma.cc/EL26-3RMD].

187. See *Cosmetology, Esthetic, and Nail Technology Schools, Satellite*

Nevada

Nevada requires 1,500 hours of training for barbers. Of that, 1,300 hours must be practical work on a patron in a barber's chair and must include at least 700 haircuts; 100 shaves; 75 shampoos; 50 scalp treatments; 50 facials; 50 tonic applications; 15 hair colorings; 15 hair straightenings; 50 stylings; and 15 hairpiece fittings. The remaining 200 hours of instruction must consist of theory and work in the classroom pertaining to the science of barbering, the management of a barbershop, ethics, salesmanship, applicable state laws and regulations, and any other theoretical instruction which the board may prescribe.¹⁸⁸ In order to convert procedural requirements into clock hours, this Article relies on Arkansas Department of Health cosmetology duration estimates (see Appendix A) to produce a set of clock-hour requirements; those clock-hour requirements are then multiplied by roughly 124% in order to fill Nevada's required 1,300 hours for those subfields.

Nevada does not require any particular number of hours for any particular cosmetology subfield; however, it requires 1,600 hours of cosmetology training generally.¹⁸⁹

Nevada requires a 600-hour course of study for manicurists.¹⁹⁰ Its regulations require the study of several subfields,¹⁹¹ but those regulations do not appear to give sufficient direction to estimate hourly distributions or proportional assignments of those subfields in a manicurist curriculum.

New Hampshire

New Hampshire requires 800 hours for barber training. It requires that the following subjects be taught, but does not specify hours for them: shampooing; haircutting; hairstyling, for men and women; razor cutting; shaves and beard trim; scalp massaging; hair analysis; hairpieces; business management and salesmanship; textbook theory, which shall consist of reading textbooks in regard to barbering; state laws and rules; and bacteriology, safety, and sanitation.¹⁹²

New Hampshire requires 1,500 hours of training to receive a cosmetology license,¹⁹³ but the number of hours of training in each subfield is not specified.

New Hampshire requires 300 hours of training to receive a manicurist's license,¹⁹⁴ but hourly subfield training is not specified.

Classrooms, and Apprentice Salons, supra note 184.

188. NEV. ADMIN. CODE § 643.660 (2021).

189. NEV. REV. STAT. § 644A.300 (2021).

190. NEV. REV. STAT. § 644A.345 (2021).

191. NEV. ADMIN. CODE § 644.120 (2021).

192. N.H. REV. STAT. ANN. § 313-A:10 (2021).

193. N.H. REV. STAT. ANN. § 313-A:11 (2021).

194. N.H. REV. STAT. ANN. § 313-A:12 (2021).

New Jersey

New Jersey requires a 900-hour course of study for barber training. The following subfields must be covered: state laws and regulations (10 hours); history of hair and barbering (4 hours); professional image and hygiene (2 hours); decontamination and infection control (20 hours); shampooing and temporary rinses (20 hours); honing and stropping (4 hours); shaving (125 hours); men's haircutting and styling (225 hours); beard and mustache trimming (15 hours); women's haircutting and styling (70 hours); facials (15 hours); anatomy (5 hours); common disorders and care of the skin, scalp, and hair (5 hours); electricity (5 hours); hairpieces (55 hours); chemistry and chemical-related services (210 hours); and hair coloring (110 hours).¹⁹⁵

New Jersey requires a 1,200-hour cosmetology curriculum, breaking down its requirements into multiple subfields as follows: state laws, rules, and regulations (10 hours); decontamination and infection (20 hours); image, hygiene, and related practices (2 hours); history of barbering (4 hours); shaving (81 hours); beard and mustache trimming (15 hours); facials/massage/skin care/makeup/depilatory/eyebrow arching (78 hours); shampooing and temporary rinses (60 hours); hair and scalp/reconditioning (50 hours); haircutting and tools (160 hours); hairstyling (160 hours); hair tinting and bleaching (145 hours); permanent waving (115 hours); chemical relaxing and pressing (90 hours); thermal curling and waving (45 hours); manicure/pedicure (135 hours); and chemistry relating to cosmetology (30 hours).¹⁹⁶

New Jersey requires a 300-hour curriculum for manicurists that includes law and administration (10 hours); image and hygiene (2 hours); decontamination and infection control (20 hours); manicuring and pedicuring (55 hours); diseases and disorders of the nail (10 hours); anatomy (10 hours); nail tips and extensions (30 hours); nail wraps (30 hours); nail gels (30 hours); sculptured nails (40 hours); nail art (10 hours); skin and its diseases (5 hours); hair removal (40 hours); first aid (5 hours); and chemicals and product chemistry (13 hours).¹⁹⁷

New Mexico

New Mexico mandates a 1,200-hour course of study for barbers. This course must include these subfields: state laws and regulations, professional image, first aid, chemistry, ethics, and electricity (75 hours); sterilization, sanitation, and bacteriology (75 hours); shampoo, rinses, and scalp treatments (75 hours); perms and relaxers (200 hours); hairstyling (150 hours); hair coloring and

195. N.J. ADMIN. CODE § 13:28-6.29B (2021).

196. N.J. ADMIN. CODE § 13:28-6.29 (2021).

197. N.J. ADMIN. CODE § 13:28-6.33 (2021).

bleaching (125 hours); haircutting and beard trimming (250 hours); facials (175 hours); salon business and retail sales (50 hours); and miscellaneous (25 hours).¹⁹⁸

New Mexico requires a 1,600-hour cosmetology curriculum, breaking down its requirements into multiple subfields as follows: theory (including orientation, state laws and regulations; image; first aid; chemistry; electricity; job seeking; ethics) (75 hours); sterilization/sanitation/bacteriology (75 hours); shampoo/rinses/scalp treatments (75 hours); chemical treatments/permanents/relaxers (200 hours); hairstyling (150 hours); hair coloring/bleaching (125 hours); haircutting (200 hours); facials (175 hours); manicuring/pedicuring (175 hours); salon business/retail sales (50 hours); and miscellaneous (300 hours).¹⁹⁹

New Mexico requires a 400-hour curriculum for manicurists. This course must include these subfields: New Mexico theory (75 hours); sterilization, sanitation, and bacteriology (75 hours); manicuring and pedicuring (175 hours); business and retail sales (50 hours); and miscellaneous (25 hours). State regulations also require the performance of specified cosmetic procedures, but they are part of a specified hourly allocation; they do not constitute a separate hourly allocation.²⁰⁰

New York

New York does not require a fixed number of training hours for licensed barbers.

New York requires a 1,000-hour cosmetology curriculum, breaking down its requirements into multiple subfields as follows: professional requirements (24 hours); safety and health (26 hours); anatomy and physiology (15 hours); hair analysis (10 hours); hair and scalp disorders (10); chemistry (5 hours); shampoos/rinses/conditioners (30 hours); haircutting/hair shaping (175 hours); hairstyling (245 hours); chemical restructuring (180 hours); hair coloring and lightening (180 hours); nail care and procedures (40 hours); and skin care and procedures (60 hours).²⁰¹

New York mandates a curriculum of 250 hours for manicurists that includes orientation (4 hours); safety and health (8 hours); bacteria, diseases, and disorders and diseases of the nails, feet, and skin (10 hours); infection control (10 hours); client consultation (10 hours); manicuring and massage (4 hours); pedicuring (20 hours); tip application and design (15 hours); business and retail (15 hours); nail wraps (25 hours); liquid and powder nail extensions (50 hours); gel nails (20 hours); nail art (4 hours); retailing techniques (6 hours); business practices (8 hours); job skills (6 hours); and

198. N.M. CODE R. § 16.34.8 (LexisNexis 2021).

199. N.M. CODE R. § 16.34.8.15.

200. N.M. CODE R. § 16.34.8.

201. N.Y. COMP. CODES R. & REGS. tit. 19, § 162.4 (2021).

miscellaneous and unassigned (38 hours).²⁰²

North Carolina

North Carolina requires a barber curriculum of 1,528 hours. It must include classroom theory in these subfields: hygiene, grooming, and ethics (25 hours); bacteriology, sterilization, and sanitation (50 hours); implements, honing, stropping, and shaving (30 hours); men's haircutting (20 hours); cutting and styling curly hair, mustaches, and beards (10 hours), shampooing and rinsing (10 hours); massage and facial treatments (5 hours); razor and shear cutting (30 hours); finger waving, air waving, and curling iron techniques (5 hours); permanent waving and chemical hair relaxing (25 hours); hair coloring (10 hours); hairpieces (5 hours); skin, scalp, and hair generally (30 hours); anatomy and physiology (10 hours); electricity, light therapy, and chemistry (10 hours); barber styling and shop management (70 hours); laws and history of barbering (20 hours). Furthermore, it must include supervised practice in these subfields: shampoo and scalp treatments (55 hours); shaving (50 hours); haircutting (250 hours); hairstyling (400 hours); facials (10 hours); frosting and hair coloring (90 hours); hairpieces (5 hours); straightening (5 hours); and treatment of hair and skin disorders (10 hours). Finally, it must include lectures and demonstrations in these subfields: shampooing and hair and scalp treatments (15 hours); shaving (20 hours); haircutting (70 hours); hairstyling (100 hours); facials (5 hours); bleaching (30 hours); hairpieces (5 hours); hair straightening (3 hours); hair and skin disorders (10 hours); and razor cutting (15 hours).²⁰³

North Carolina requires 1,500 hours of training to receive a cosmetology license, but the number of hours of training in each subfield is not specified.²⁰⁴

North Carolina requires 300 hours of training and practical performances to receive a manicurist's license, but hourly subfield training is not specified.²⁰⁵

North Dakota

North Dakota mandates 1,550 hours of barber training but has no subfield hourly requirements.²⁰⁶

North Dakota requires an 1,800-hour cosmetology curriculum,²⁰⁷ breaking down its requirements into multiple subfields as follows: hair shaping (250 hours); hairstyling (250 hours); nails (100 hours); facials/skin care (100 hours); chemical services (250 hours); theory/law/cleaning and disinfecting (400

202. N.Y. COMP. CODES R. & REGS. tit. 19, § 162.1 (2021).

203. 21 N.C. ADMIN. CODE 6F.0120 (2021).

204. N.C. GEN. STAT. § 88B-7 (2021).

205. 21 N.C. ADMIN. CODE 14T.0605 (2021).

206. N.D. ADMIN. CODE 14-03-01-01 (2021).

207. N.D. CENT. CODE 43-11-16 (2021).

hours); and related subjects (450 hours).²⁰⁸

North Dakota requires a curriculum of 350 hours for a manicurist that includes cleaning and disinfecting (45 hours); manicuring, pedicuring, and artificial nails (200 hours); law and disinfecting (45 hours); related subjects (35 hours); and unassigned (25 hours).²⁰⁹

Ohio

Ohio mandates a barber curriculum of 1,800 hours. Ohio mandates that schools provide 100 hours of theoretical study in scientific fundamentals of barbering; hygiene and bacteriology; histology of the hair, skin, and nerves; anatomy; chemistry relating to sterilization and antiseptic; diseases; barber history; barber law; salesmanship; advertising; public relations; barber ethics and shop management; and human trafficking. Ohio also mandates 200 hours of scientific barbering practice, including facial treatments; shampoo treatments; tinting; bleaching, facial shaving; haircutting (tapers); haircutting (style/trend cuts); haircutting (styling); straightening and relaxing; permanent waving; hairpieces; and barber implements. Finally, Ohio requires 1,200 hours of general barber practice in facial treatments; scalp treatments; shampoo treatments; tinting; bleaching; facial shaving; haircutting (tapers); haircutting (style/trend cuts); haircutting (styling); straightening and relaxing; permanent waving; shop duties; shop management; and hairpieces.²¹⁰

Ohio requires a 1,500-hour cosmetology curriculum,²¹¹ breaking down its requirements into multiple subfields as follows: infection control and principles/practices (60 hours); hair and scalp (including shampoos/chemistry) (120 hours); hair procedures and practices (including styling, thermal styling, braiding, wiggery, and haircutting) (460 hours); chemical procedures and practices (including permanent wave, relaxers, hair coloring) (480 hours); manicure/pedicure (including massage) (120 hours); skin care (including facials and electricity) (120 hours); salon operations and communication (120 hours); and cosmetology laws and rules (20 hours).²¹²

Ohio requires a curriculum of 200 hours for manicurists. That course must consist of infection control and practices (30 hours), anatomy (10 hours), massage (10 hours), nail care procedures and practices (55 hours), chemistry of nail materials (10 hours), nail enhancements (35 hours), specialized equipment (10 hours), salon

208. N.D. ADMIN. CODE 32-04-01-26.1 (2021).

209. N.D. ADMIN. CODE 32-04-01-28 (2021).

210. OHIO REV. CODE ANN. § 4709.07 (2021).

211. OHIO REV. CODE ANN. § 4713.28 (2021).

212. *1500 Hours Cosmetology Curriculum*, OHIO ST. COSMETOLOGY & BARBER BOARD, www.cos.ohio.gov/Portals/0/Files/COS/1500%20hour%20cos.pdf [perma.cc/C5PS-3BZZ] (last updated May 15, 2019).

operations and communications skills (20 hours), and cosmetology laws and rules (20 hours).²¹³

Oklahoma

Oklahoma mandates a barber curriculum of 1,500 hours. It must include these subfields: safe work practices, infection control, bacteriology, implements, tools, equipment, sterilization, disinfection and safety (155 hours); salesmanship, job search, shop management, history of barbering and professional image (175 hours); anatomy, physiology, chemistry, electricity and light therapy, properties and disorders of skin, scalp and hair, hair and scalp treatments (200 hours); facial massage and treatment (40 hours); haircutting and styling (580 hours); chemical relaxing, soft curl perms, permanent waving (95 hours); hair coloring (150 hours); men's hairpieces, mustache, beard design and shaving (65 hours); and board rules, regulations and statutes (40 hours).²¹⁴

Oklahoma requires a 1,500-hour cosmetology curriculum, breaking down its requirements for privately-owned cosmetology schools into multiple subfields as follows: theory, corresponding with practice subjects (150 hours); manicuring and pedicuring (90 hours); facials (160 hours); scalp treatments and shampooing/conditioning rinses (30 hours); hairstyling (including finger waving, wiggery, thermal, and blow-drying) (300 hours); hair coloring/tints/bleaching (180 hours); haircutting (180 hours); professional development/management/unassigned hours for review (180 hours); and waving and relaxing (240 hours).²¹⁵

Oklahoma requires that manicurists complete a 600-hour curriculum that includes the following subfields: bacteriology and disinfection (40 hours); nail structure, composition, disorders, and diseases (60 hours); manicuring and pedicuring (160 hours); artificial nails (160 hours); nail art (60 hours); business development (80 hours); and rules, regulations, and statutes (40 hours).²¹⁶

Oregon

Oregon requires a course of study of 786 hours for barbers. That course must include the following subfields: shaving (80 hours), styling (157.5 hours), mustache and beard trimming (60 hours), haircut (320 hours), facial massage (40 hours), hair and scalp (30 hours), microbiology (8 hours), anatomy and physiology (22 hours), tools (5.5 hours), product knowledge (9 hours), safety and law (14 hours), career development (20 hours), and laws and

213. OHIO REV. CODE ANN. § 4713.28 (2021).

214. OKLA. ADMIN. CODE 175:10-3-45 (2021).

215. Oklahoma State Board of Cosmetology Rules and Regulations, § 175:10-3-34.

216. OKLA. ADMIN. CODE 175:10-3-38 (2021).

rules (20 hours).²¹⁷

Oregon requires a course of 1,150 hours for hair design. That course must include the following subfields: anatomy and physiology (22 hours), microbiology (4 hours), haircutting (320 hours), hairstyling (157.5 hours), chemical services (540 hours), shaving (5 hours), equipment (17.5 hours), product knowledge (31 hours), safety and law (13 hours), career development (20 hours), and laws and regulations (20 hours).²¹⁸

Oregon requires a curriculum of 281 hours for manicurists. That course must include the following subfields: anatomy and physiology (18 hours), microbiology (2 hours), manicuring (40 hours), pedicuring (40 hours), artificial nails (120 hours), tools (6 hours), product knowledge (8 hours), safety and law (7 hours), career development (20 hours), and law and rules (20 hours).²¹⁹

Pennsylvania

Pennsylvania requires 1,250 hours of barber training. That requirement is divided into these subfields: honing and stropping (25 hours), shaving and using the straight razor (240 hours); haircutting, hairstyling, and hairpieces (535 hours); shampoo and scalp massage (25 hours); hair coloring (25 hours); massaging or facials (25 hours); hair waving, curing, permanents, and straightening (25 hours); scalp and skin diseases (50 hours); law and regulations (50 hours); physiology (50 hours); sterilization and sanitation (50 hours); hygiene (25 hours); bacteriology (25 hours); electricity (25 hours); professional ethics and demeanor (25 hours); and shop management and instruments (50 hours).²²⁰

Pennsylvania, which requires a 1,250-hour cosmetology curriculum, recommends the following requirements for subfields: professional practices (including sanitation, law, business practices, and professional attitude) (50 hours); sciences (200 hours); and cosmetology skills (including shampooing, hair shaping, hairstyling, permanent waving, hair coloring, hair straightening, skin care, nail technology, hair removal, scalp treatment, and makeup) (1,000 hours).²²¹

Pennsylvania requires a curriculum of 200 hours for manicurists, which must include these subfields: professional practice (25 hours), sciences (75 hours), nail treatments (75 hours), and pedicuring (25 hours).²²²

217. Oregon produces a document entitled “Current and NEW Minimum Program Operations and Hours Effective May 1, 2019 and no later than July 1, 2019” from which these figures are taken. *See also* OAR 715-045-0200.

218. *See supra* note 217.

219. *See supra* note 217.

220. 49 PA. CODE § 3.71 (2021).

221. 49 PA. CODE § 7.129 (2021).

222. *Id.*

Rhode Island

Rhode Island requires 1,500 hours of barber training but has no hourly subfield requirements.²²³

Rhode Island does not require any particular number of hours for any particular cosmetology subfield. In order to receive a hairdresser/cosmetician license, students must undergo no less than 1,200 hours of study and practice.²²⁴

Rhode Island mandates a 300-hour curriculum for manicurists but does not mandate any subfields.²²⁵

South Carolina

South Carolina mandates a nine-month, 1,500-hour course²²⁶ in barber training that must cover the following subjects, but it does not provide a detailed breakdown of the hours for each subject: barbering; haircutting; shaving; shampooing, and the application of creams and lotions; shedding and regrowth of hair, hygiene; sanitation and sterilization; anatomy; elementary chemistry; massaging and scalp treatments; massaging and manipulation of the muscles in the scalp, neck and face; and history of barbering and professional ethics.²²⁷

South Carolina requires a 1,500-hour curriculum for cosmetologists,²²⁸ breaking down its requirements into multiple subfields as follows: sanitation and disinfection (45 hours); personal hygiene and grooming (30 hours); professionalism/ethics (35 hours); public relations and salesmanship (50 hours); anatomy (45 hours); dermatology (25 hours); trichology (25 hours); nail structure (15 hours); chemistry (100 hours); safety precautions (30 hours); shampoos and rinses (45 hours); scalp and hair treatments (30 hours); hair shaping (150 hours); hairstyling (including thermal) (325 hours); nail technology (25 hours); waving and relaxing (225 hours); coloring and bleaching (225 hours); facial (40 hours); state law (15 hours); and unassigned (20 hours).²²⁹

South Carolina mandates a 300-hour curriculum for manicurists, to be divided among the following subfields: bacteriology and sanitation (75 hours), anatomy and physiology (30 hours), nail technology (105 hours), artificial nails (50 hours), power equipment (25 hours), and state law (15 hours).²³⁰

South Dakota

South Dakota mandates a nine-month course of at least 1,500

223. R.I. GEN. LAWS § 5-10-9 (2021).

224. *Id.*

225. *Id.*

226. S.C. CODE ANN. § 40-7-230 (2021).

227. S.C. CODE ANN. REGS. § 17-14 (2021).

228. S.C. CODE ANN. § 40-13-230.

229. S.C. CODE ANN. REGS. § 35-3 (2021).

230. *Id.*

hours in barber training that must cover the following subjects, but does not provide a detailed breakdown of the hours for each subject: scientific fundamentals for barbering, hygiene, bacteriology as applied to barbering, structure of the head, face and neck, elementary chemistry relating to sterilization and antiseptics, diseases of the skin and hair, massaging and manipulating the muscles of the upper body, haircutting, shaving, and arranging, dressing, coloring, bleaching, and tinting the hair.²³¹

South Dakota requires a 1,500-hour cosmetology curriculum,²³² breaking down its requirements into multiple subfields as follows: infection control procedures and professional standards (150 hours); scientific concepts (200 hours); general cosmetology (300 hours); chemical hair services (280 hours); esthetics and skin sciences (200 hours); nail technology (120 hours); and optional (250 hours).²³³

South Dakota mandates a 400-hour curriculum for manicurists. That course must include safety and infection control procedures (60 hours); scientific concepts (60 hours); manicure, pedicure, and massage (90 hours); artificial nails, including sculptured nails, tips, wraps, and gel (130 hours); and management, salesmanship, and ethics (60 hours).²³⁴

Tennessee

Tennessee requires a 1,500-hour barber curriculum, which distinguishes between general hours, chemical hours, and physical hours. The state mandates 240 general hours, covering history and fundamentals of barbering; elementary chemistry relating to sterilization, sanitation, bacteriology, and hygiene; barber implements; shaving; skin, scalp and hair generally; haircutting, hairstyling and hairsetting; hairpieces; chemical theory (permanent waving, hair coloring, bleaching and straightening); manicure and nail care; anatomy, physiology and systems structure of the head, face and neck, including muscles and nerves; makeup and skin care; theory of massage and facial treatment; disorders of the skin, scalp, and hair; barber law, rules and regulations; business management and salesmanship; and preparation for seeking employment. The state mandates 360 chemical hours, covering permanent waving; hair relaxer; hair coloring, bleaching and toning; and manicures. The state mandates 900 physical hours, covering shampooing and rinses; hair care and scalp care; haircutting; shaving (beards and mustaches); hairpiece-fitting; hairstyling; facials and makeup; and manicures.²³⁵

Tennessee requires a 1,500-hour cosmetology curriculum,

231. S.D. CODIFIED LAWS § 36-14-17 (2021).

232. S.D. CODIFIED LAWS § 36-15-17 (2021).

233. S.D. ADMIN. R. 20:42:06:09 (2021).

234. S.D. ADMIN. R. 20:42:06:09.01.

235. TENN. COMP. R. & REGS. 0200-01-.02 (2021).

breaking down its requirements into three multi-subfield components: general (including sterilization, sanitation, bacteriology, anatomy, physiology, ethics, personality, and state law) (300 hours); chemical (including permanent waves, hair relaxer, hair coloring, bleaching and toning, nails, hair structure, and chemistry) (600 hours); and physical (including shampooing and rinses, hair and scalp care, hair shaping, hairdressing and styling, facials, arching, lash and brow tinting, manicures and pedicures) (600 hours).²³⁶

Tennessee mandates that manicurists take a 600-hour curriculum, with these subfields: general, including sterilization, anatomy, ethics, and law (150 hours); chemical, including product knowledge, nails, EPA and OSHA regulations (100 hours); and physical, including massage, manicuring, and artistry (350 hours).²³⁷

Texas

Texas mandates a course of 1,000 hours for a barber license. That course requires training in three broad areas: a 150-hour course in barbering basics (comprising anatomy and physiology; disorders of the skin, scalp, hair, and nails; chemistry (haircoloring, chemical waving, and relaxing); bacteriology, sterilization, and sanitation; safety, first aid, and sanitation; barber implements, tools, equipment, and related theory; and history of barbering); a 750-hour course in barbering practice (comprising shaving; mustaches and beards; haircutting; hairstyling; hair and scalp treatments; scalp massage; safety, first aid, and sanitation; hairweaving, extensions, and wigs; face and neck massage and treatments; facial hair removal; manicuring; chemistry [haircoloring, chemical waving, and relaxing]; and razor techniques, safety, first aid, and sanitation); and a 100-hour course in the business of barbering (comprising laws and rules; customer service; shop management; ethics and image; safety, sanitation, related practices, and theory; and hygiene and good grooming).²³⁸

Texas mandates a course of 1,000 hours for a cosmetology license. That course requires training in three broad areas: an 800-hour course in hair care (comprising cutting, styling, coloring, chemical textures, and related theory and application; business skills; professional development and salon management; health; safety; and laws); a 100-hour course in nail care (comprising manicuring and related theory and applications; business skills; professional development and salon management; health; safety; and laws); and a 100-hour course in skin care (comprising facials, hair removal, and related theory and application; business skills;

236 TENN. COMP. R. & REGS. 0440-01-.03 (2021).

237. TENN. COMP. R. & REGS. 0440-01-.03 (2021).

238. 16 TEXAS ADMIN. CODE § 82.120 (2021).

professional development and salon management; health; safety; and laws).²³⁹

Texas mandates a course of 600 hours for a manicurist's license. That course requires training in several broad areas: a 320-hour course in procedures (including such matters as manicure, massage, and artificial nails), a 100-hour course in bacteriology and sanitation, an 80-hour course in professional practices, a 70-hour course in the arms and hands (including such matters as bones, muscles, nerves, and skin), a 15-hour course in rules and law, and a 15-hour course in equipment, implements, and supplies.²⁴⁰

Utah

Utah mandates a course of 1,000 hours for a barber license. The course must teach the following subfields, but the state does not mandate minimum hours for each subfield: history of barbering; personal, client, and shop safety, including sanitary procedures and business management; legal issues; human immune system; diseases and disorders of the hair and scalp; implements, tools, and equipment for barbering; first aid; anatomy; science of barbering; chemistry for barbering; analysis of the hair and scalp; properties of the hair, skin, and scalp; basic hairstyling and haircutting; shaving and razor cutting; mustache and beard design; elective topics; and barber examination review.²⁴¹

Utah requires 1,600 hours of training for a cosmetologist/barber license but does not require any particular number of hours of training for any particular cosmetology subfield.²⁴²

Utah requires a 300-hour curriculum for manicurists but does not specify subfields of study.²⁴³

Vermont

Vermont requires a 750-hour course of study for a barber license but does not assign hours to subfields.²⁴⁴

Vermont requires 1,000 hours of training for a cosmetology license but does not require any particular number of hours of training for any particular cosmetology subfield.²⁴⁵

Vermont requires a 200-hour curriculum for manicurists but

239. 16 TEXAS ADMIN. CODE § 83.120 (2021).

240. 16 TEXAS ADMIN. CODE § 82.120 (2021).

241. UTAH ADMIN. CODE r. 156-11a-700 (2021).

242. UTAH ADMIN. CODE r. 156-11a-705 (2021).

243. UTAH ADMIN. CODE r. 156-11a-704 (2021).

244. At the time of writing, this information was taken from Part 4-2 of the draft Administrative Rules for Barbers & Cosmetologists, Office of Professional Regulation, State of Vermont. See 04-030-030 VT. CODE R. § 1 (2021).

245. At the time of writing, this information was taken from Part 5-2 of the draft Administrative Rules for Barbers & Cosmetologists, Office of Professional Regulation, State of Vermont.

does not specify subfields of study.²⁴⁶

Virginia

Virginia mandates a course of 1,100 hours for a barber license.²⁴⁷ The course must teach the following subfields, but the state does not mandate minimum hours for each subfield: school policies; state law, regulations, and professional ethics; business and shop management; client consultation; personal hygiene; cutting the hair with a razor, clippers, and shears; tapering the hair; thinning the hair; shampooing hair; shaving; trimming a moustache or beard; applying hair color; analyzing skin or scalp conditions; giving scalp treatments; giving basic facial massage or treatment; sanitizing and maintaining implements and equipment; and honing and stropping a razor.

Virginia requires 1,500 hours of training for a cosmetology license,²⁴⁸ but does not require any particular number of hours of training for any particular cosmetology subfield. The state's curriculum requirements include thirteen different numeric performance requirements of various cosmetology services,²⁴⁹ and its regulations describe eleven different required curricular subfields in detail,²⁵⁰ but largely because there are no specifications for clock-hour training in those subfields, there is no obvious way to convert these free-standing specifications into clock hours. Although it is possible to convert the thirteen performance requirements into clock hours, and to do the same with the eleven curricular subfields by assuming an equal share of clock hours for each one, that method would arguably lead to significantly more imprecise results than the calculations this Article makes for other states.

Virginia requires a 150-hour curriculum for manicurists but does not specify an hourly distribution for subfields.²⁵¹

Washington

Washington State mandates a course of 1,000 hours for a barber license.²⁵² The course must teach the following subfields, but the state does not mandate minimum hours for each subfield: theory of the practice of barbering services and business practices and basic human anatomy and physiology; shampooing; scalp and hair analysis; haircutting and trimming; hairstyling; cutting and

246. VT. STAT. ANN. tit. 26, § 276 (2021).

247. 18-20 VT. CODE R. § 220 (2021).

248. *Id.*

249. *Id.*

250. Virginia Department of Professional and Occupational Regulation, Board for Barbers and Cosmetology Regulations and Statutes, August 1, 2018, at 15-16.

251. 18-20 VT. CODE R. § 220.

252. WASH. REV. CODE § 18.16.020 (2021).

trimming of facial hair; artificial hair; cleaning and disinfecting of individual work stations, individual equipment and tools and proper use and storage of linens; diseases and disorders of the skin, scalp and hair; safety; and first aid.

Washington State requires 1,600 hours of training for a cosmetology license but does not require a particular number of hours of training for any particular cosmetology subfield.²⁵³

Washington State requires a 600-hour course of study for manicurists²⁵⁴ but does not specify an hourly distribution for subfields.

West Virginia

West Virginia mandates a course of 1,200 hours for a barber license. The state mandates these hours for each subfield: general professional information, including state law, sanitation, first aid, and infection control (100 hours); introduction into barbering (3 hours); the science of barbering, including infection control, anatomy, chemistry, electricity, and disorders of the skin, hair, and scalp (350 hours); and professional barbering (747 hours).²⁵⁵

West Virginia requires an 1,800-hour cosmetology curriculum, breaking down its requirements into multiple subfields as follows: professional information (including business management, state law, sanitation, and infection control) (100 hours); science of cosmetology (including infection control, anatomy and physiology, skin diseases and disorders, properties of the hair and scalp, electricity, and chemistry) (250 hours); professional cosmetology (including hair design, scalp care, shampooing, hairstyling, braiding, and wigging) (450 hours); chemicals (including hair coloring) (200 hours); esthetics (including infection control, anatomy and physiology, chemistry, electricity, and nutrition) (167 hours); skin sciences (including physiology, skin diseases and disorders, and chemistry) (130 hours); esthetics II (including facials, massage, and hair removal) (203 hours); nail technology (including infection control, anatomy and physiology, chemistry, and electricity) (74 hours); basic procedures (including manicures, pedicures, massages, and disinfection) (92 hours); and nail technology II (including manicuring and pedicuring) (134 hours).²⁵⁶

West Virginia requires a 400-hour curriculum for manicurists. The state mandates these subfields: professional information, such as law, sanitation, and communication (100 hours); nail science, including infection control, anatomy, skin, and disorders (74 hours); basic procedures, including manicures, massages, wraps, and

253. *Id.*

254. *Id.*

255. W. VA. CODE R. § 3-1-4 (2021).

256. Legislative Rules, West Virginia Board of Barbers and Cosmetologists, § 3-1-5, wvbbc.com/Portals/WVBBC/docs/Laws/Final%20File%20Series%201.pdf?ver=2013-05-16-153705-337 [perma.cc/Q2NZ-E2XC]; *infra* Table 3-1B.

disinfection (92 hours); and nail technology and art (134 hours).²⁵⁷

Wisconsin

Wisconsin mandates a course of 1,000 hours for barbers. It requires these subfields: hygiene, grooming, and personal development (5 hours); bacteriology and sterilization (25 hours); tools and equipment (13 hours); Wisconsin hair services (500 hours); Wisconsin chemical services (337 hours); Wisconsin shaving services (50 hours); hair, skin, and scalp (15 hours); product knowledge (15 hours); laws, ethics, and history (18 hours); and electives (22 hours).²⁵⁸

Wisconsin requires a 1,550-hour cosmetology curriculum, breaking down its requirements into multiple subfields as follows: hygiene, grooming, and personal development (10 hours); bacteriology, sterilization, and sanitation (40 hours); haircutting (including hairstyling, thermal waving, shampoos, scalp and hair treatment, and wiggery) (580 hours); hair straightening/relaxing/thermal straightening/permanents/coloring/chemistry (577 hours); shaving/beard and mustache shaping/hair removal/facial massages/makeup/electricity/electrology (95 hours); manicuring (35 hours); anatomy/physiology of hair/skin/scalp/nails (50 hours); product knowledge and sales (30 hours); laws/rules/ethics/cosmetology history (18 hours); and individual student needs and electives (115 hours).²⁵⁹

Wisconsin requires a 300-hour curriculum for manicurists, consisting of these subfields: law, management, history, and ethics (36 hours); safety and sanitation (35 hours); nails and skin disorders (34 hours); anatomy and physiology (26 hours); manicuring and pedicuring (136 hours); advertising (12 hours); and electives (21 hours).²⁶⁰

Wyoming

Wyoming requires a course of 1,000 hours for a hairstyling license. The state mandates that students take the following subfields: general infection control and professional standards (100 hours); the science of hairstyling (150 hours); general cosmetology (500 hours); and chemical services (250 hours).²⁶¹

Wyoming requires a 1,600-hour cosmetology curriculum, breaking down its requirements into multiple subfields as follows: cosmetology science, hair, skin and nails (including health, safety, and infection control; anatomy and physiology; skin diseases and disorders; hair and scalp; nail structure and disorders; product

257. W. VA. CODE R. § 3-1-6 (2021).

258. WIS. ADMIN. CODE SPS § 50.300 (2021).

259. WIS. ADMIN. CODE Cos § 5.02 (2021).

260. WIS. ADMIN. CODE Cos § 5.06 (2021).

261. Wyoming Rules and Regulations 033.0001.6 § 3, cosmetology.wyo.gov/rules-regulations [perma.cc/2K3R-Q5FB].

chemistry basic nutrition; basic chemistry; basic electricity) (290 hours); general cosmetology (including hair design, scalp care, shampooing, haircutting, hairstyling, braiding, and wiggery (500 hours); chemical services (including hair coloring) (250 hours); skin sciences (70 hours); esthetics (including facial massage and makeup) (180 hours); nail technology (including massage) (210 hours); and infection control/professional standards (100 hours).²⁶²

Wyoming mandates a curriculum of 300 hours for manicurists. That course must cover: the science of nail technology, including infection control and physiology (40 hours); nail technology, including exposure incidents, manicures, and pedicures (110 hours); and art, including manicuring and pedicuring, filing, and tips and wraps (150 hours).²⁶³

Appendix C: Jurisdiction-By-Jurisdiction Calculation Tables and Charts

This Appendix briefly explains the nature of the graphs and tables this Article contains. Six bar graphs are interspersed throughout the Article's main text above; Tables 1A, 1B, 1C, 2, and 3 immediately follow this Appendix.

The six bar graphs provide information on licensing requirements for three appearance professions across jurisdictions. Three of those bar graphs — Figures 1, 3, and 5 — provide hourly training requirements for all fifty-one jurisdictions in the United States with one exception: because the state of New York does not require a set number of hours for barber training, the bar graph for barbers omits New York. The other three bar graphs — Figures 2, 4, and 6 — provide information only on regulatory requirements in thirty-eight qualifying jurisdictions that allow the measurement of the health and safety portion of the curricula. This second set of three bar graphs represents an estimate of two portions of required training — those that pertain, and those that do not pertain, to health and safety — as calculated by this Article's health and safety ratings. Appendix B provides the data for Figures 1, 3, and 5; the other three bar graphs use data both from Appendix B and from Tables 1A, 1B, and 1C that are described immediately below.

Tables 1A, 1B, and 1C list the qualifying jurisdictions, their local health and safety ratings, and their averages.²⁶⁴ The average rating for barbers is 26.60%; the average for cosmetologists is 25.45%; the average for manicurists is 39.71%. (These three figures, and all of the figures in the left-hand column of these three tables, are derived from the data in Table 2.) This Article assumes that 100% of the science training (for instance, training in chemistry and anatomy) contained in personal appearance curricula is relevant to health and safety; if that assumption is discarded, then those

262. Board of Cosmetology, Wyoming Rules and Regulations, Chapter 6 § 2.

263. Wyoming Rules and Regulations 033.0001.6 § 4.

264. *See infra* Table 1(A); Table 1(B); Table 1(C).

ratings are artificially high. A critic of that assumption would argue that a significant portion of the science that is contained in personal appearance curricula is essentially unrelated to matters that professional appearance professionals would want to know or need to use; there is an argument that the texts' treatment of the sciences is heavy on vocabulary but light on substance, and furthermore that much of it is irrelevant not only to health and safety but also to professional practice. If one adopts this critical perspective and therefore assumes that 25% of professional appearance training in chemistry, anatomy, and physiology (and unspecified "science" more generally) is relevant to health and safety²⁶⁵ (rather than 100%), then the average for barbers drops to 24.11%, the average for cosmetologists drops to 22.91%, and the average for manicurists drops to 36.15%; this is demonstrated by the table's rightward column. (To clarify and restate: this Article assumes that 100% of the science contained in personal appearance curricula is relevant to health and safety, but because this assumption may be controversial, this Article also provides an alternative method of calculation which will be most relevant to those who believe that it is more accurate to estimate that only 25% of the appearance curricula in the sciences is relevant to health and safety.)

Table 2 provides a tabular account of available or derived clock-hour training requirements for three professions in fifty-one jurisdictions (the fifty U.S. states and the District of Columbia), arranged alphabetically by state and then by profession; this tabular account illustrates Appendix B's plain-language summary of statutory and regulatory requirements in a more formal way.²⁶⁶ For each of the jurisdictions in which it is possible to break down required subfields by clock hours, Table 1 provides an account of each subfield's required hours, the percentage of each subfield that covers health and safety, and the product of these two factors for each subfield. (Some assumptions were required to derive some subfield hours. Those assumptions are discussed generally in Appendix A. In a few cases in which particularized assumptions are

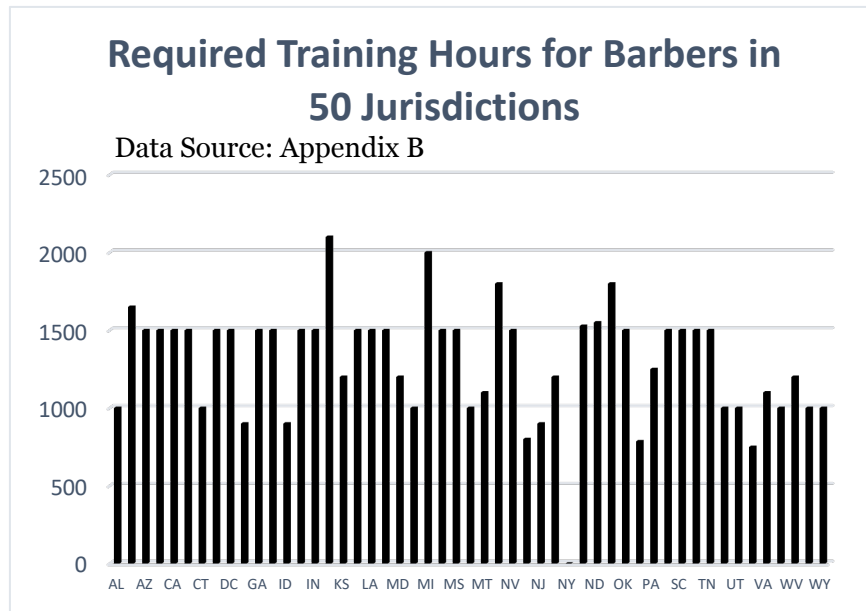
265. However, this calculation does not assume any downward adjustment for the fields of bacteriology, sanitation, sterilization, or electricity, essentially because their treatment in the relevant textbooks and in the appearance curricula more generally seems much more directly tied to the practice of the personal appearance professions. (It is perhaps worth adding that bacteriology, sanitation, and sterilization seem to have significant overlap in cosmetology training.) In other words, both sets of calculations assume a health and safety rating for bacteriology, sanitation, sterilization, and electricity of 100%. Table 3 provides this Article's calculations of health and safety ratings for each jurisdiction, given the assumption that the health and safety rating for chemistry, anatomy, physiology, and science more generally is 100%; for reasons of space, the alternate calculation (that rests on assigning chemistry, anatomy, physiology, and science more generally a health and safety rating of 25%) is not shown.

266. See *infra* Table 1(B).

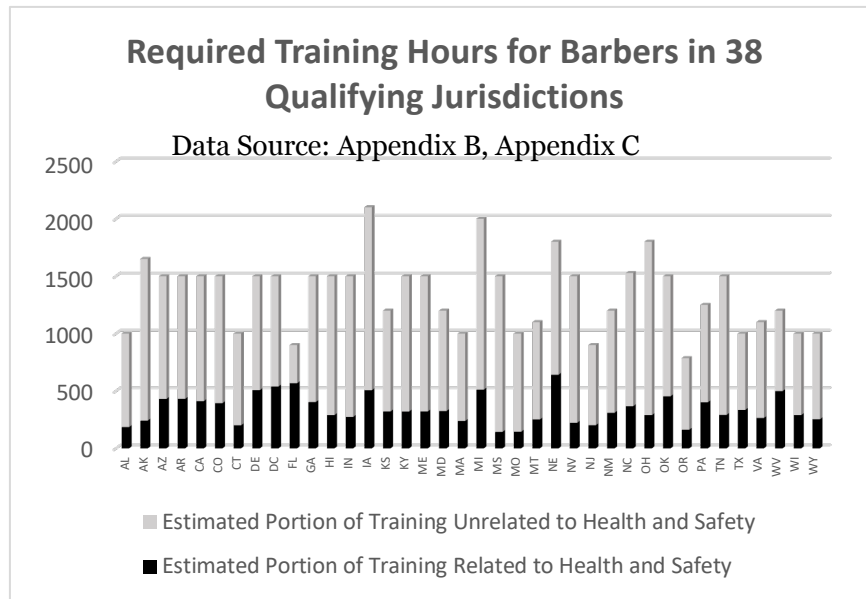
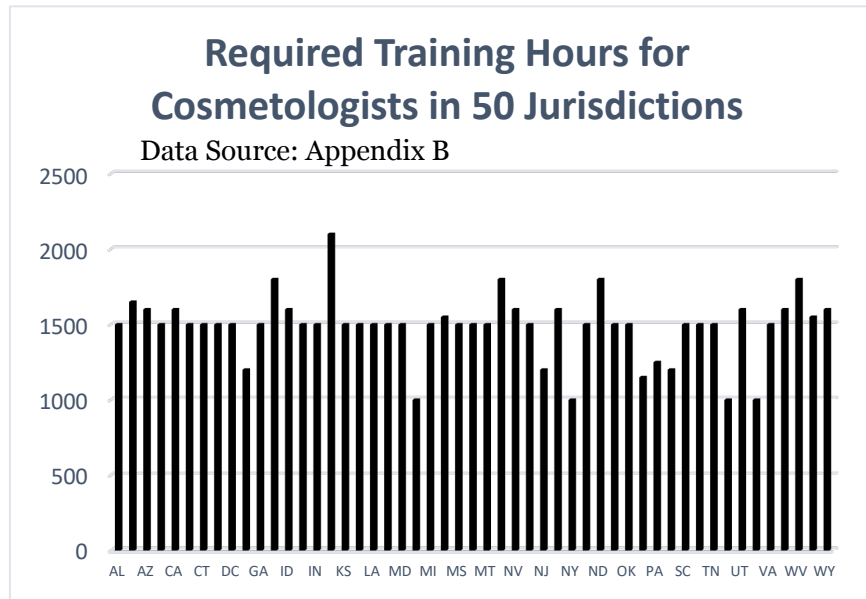
necessary, they are discussed in Appendix B. For the most part, however, the subject-matter hourly requirements that are used to make calculations come unmediated from state law and regulations; those legal requirements are reproduced, typically verbatim, in Appendix B.) In order to make the calculation more transparent, each subfield was assigned a code that corresponds to its own health and safety rating. Table 1 also sums all of these products to produce a total number of health and safety training hours for each state; when this sum is divided by the total number of training hours that the jurisdiction requires for licensing, this ratio produces a comprehensive health and safety rating for the entire jurisdiction. The rightmost column of Table 1 provides the jurisdiction's abbreviation, but only for qualifying jurisdictions: the purpose of this column is to distinguish qualifying jurisdictions from non-qualifying ones.

Table 3 categorizes each cosmetology subfield by code and health and safety rating; the table is alphabetized by code. As described in the paragraph above, this table is intended to ensure that the reader finds the calculations to be transparent. In some cases, a category (and its corresponding code) represents the combination of two or more subfields; in such cases, those subfields' ratings are averaged together.

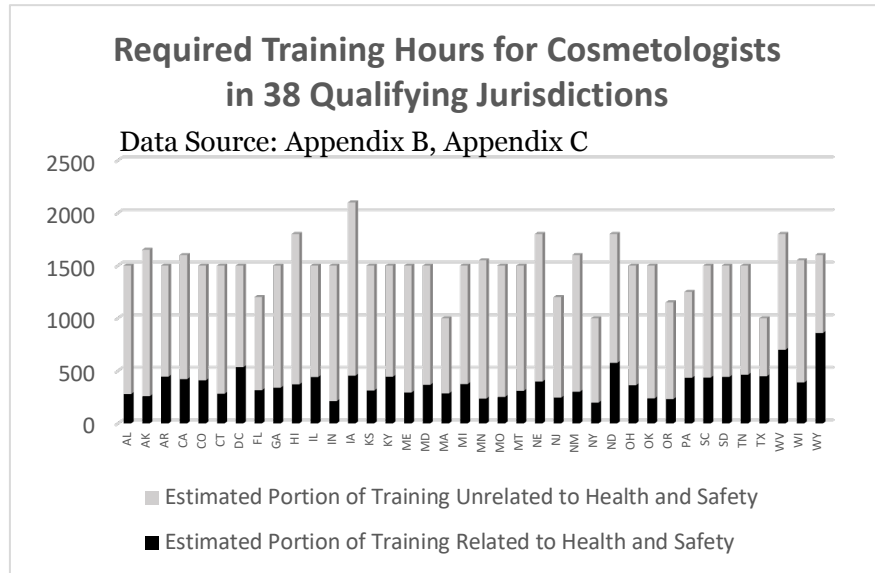
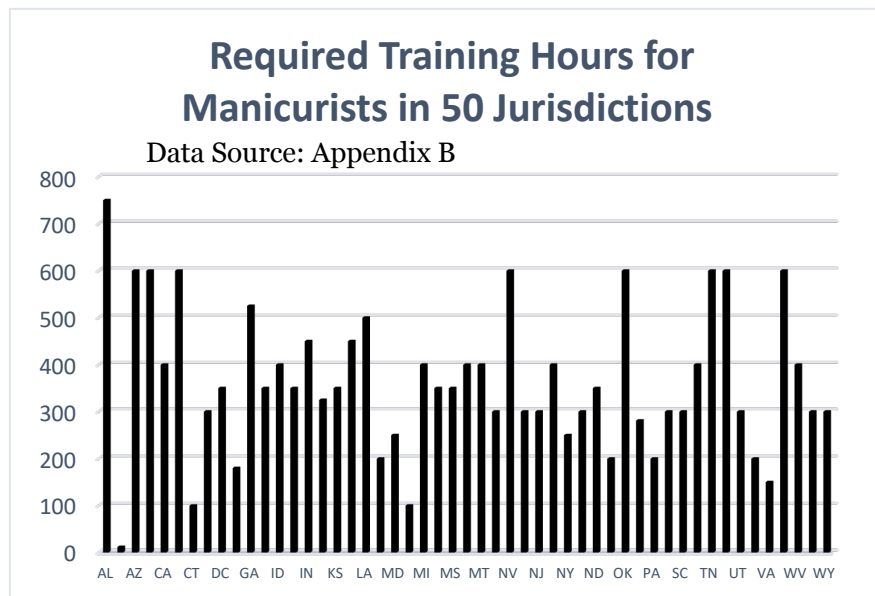
Figure 1²⁶⁷



267. All States are listed in alphabetical order by their names, not their two-letter abbreviations.

Figure 2**Figure 3²⁶⁸**

268. All States are listed in alphabetical order by their names, not their two-letter abbreviations.

Figure 4**Figure 5**²⁶⁹

269. All States are listed in alphabetical order by their names, not their two-letter abbreviations.

Figure 6

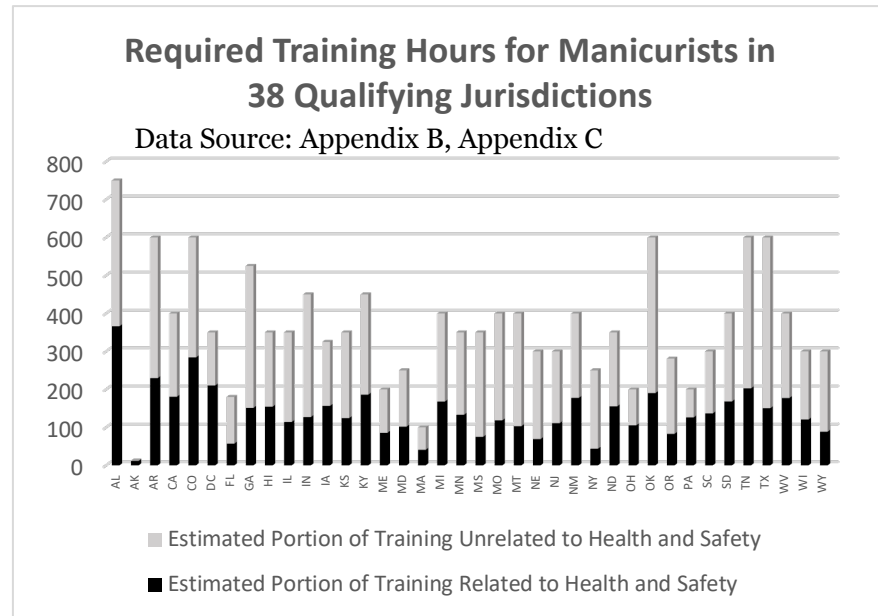


Table 1A (Barber)

Jurisdiction of Barber License	Health and Safety Percentage of Curriculum (Assumes 100% of Science in Barber Curriculum Is Relevant to Health and Safety)	Modified Health and Safety Percentage of Curriculum (Assumes 25% of Science in Barber Curriculum Is Relevant to Health and Safety)
ALABAMA	18.52%	15.71%
ALASKA	14.66%	14.66%
ARIZONA	28.71%	25.14%
ARKANSAS	28.75%	20.00%
CALIFORNIA	27.41%	26.03%
COLORADO	26.22%	26.22%
CONNECTICUT	20.11%	18.99%
DELAWARE	33.82%	33.32%
DISTRICT OF COLUMBIA	35.92%	24.67%
FLORIDA	63.07%	63.07%
GEORGIA	26.92%	23.79%
HAWAII	19.34%	19.34%
INDIANA	18.26%	16.26%
IOWA	24.11%	22.18%
KANSAS	26.79%	16.66%
KENTUCKY	21.40%	16.40%
MAINE	21.45%	17.20%
MARYLAND	27.10%	22.35%
MASSACHUSETTS	23.88%	23.50%
MICHIGAN	25.58%	25.58%
MISSISSIPPI	9.56%	9.56%

MISSOURI	14.51%	13.76%
MONTANA	22.89%	22.89%
NEBRASKA	35.63%	35.63%
NEVADA	14.85%	12.85%
NEW JERSEY	22.42%	22.01%
NEW MEXICO	25.82%	25.04%
NORTH CAROLINA	24.04%	23.30%
OHIO	16.09%	14.84%
OKLAHOMA	30.22%	26.22%
OREGON	20.62%	18.52%
PENNSYLVANIA	32.13%	29.13%
TENNESSEE	19.44%	18.69%
TEXAS	33.46%	31.85%
VIRGINIA	24.06%	24.06%
WEST VIRGINIA	41.57%	32.20%
WISCONSIN	29.02%	26.21%
WYOMING	25.34%	21.59%
38-JURISDICTION AVERAGE	25.62%	23.14%

The 38-jurisdiction average hourly requirement is 1,347.4 hours.

Table 1B (Cosmetologist)

Jurisdiction of Cosmetologist License	Health and Safety Percentage of Curriculum (Assumes 100% of Science in Cosmetologist Curriculum Is Relevant to Health and Safety)	Modified Health and Safety Percentage of Curriculum (Assumes 25% of Science in Cosmetologist Curriculum Is Relevant to Health and Safety)
ALABAMA	18.62%	18.62%
ALASKA	15.69%	15.69%
ARKANSAS	29.62%	23.62%
CALIFORNIA	26.31%	26.31%
COLORADO	27.30%	27.30%
CONNECTICUT	18.82%	18.07%
DISTRICT OF COLUMBIA	35.65%	24.40%
FLORIDA	26.32%	25.82%
GEORGIA	22.60%	19.39%
HAWAII	20.62%	17.12%
ILLINOIS	29.37%	28.83%
INDIANA	14.12%	13.37%
IOWA	21.59%	18.99%
KANSAS	20.85%	20.85%
KENTUCKY	29.58%	24.35%
MAINE	19.59%	15.34%
MARYLAND	24.46%	21.86%
MASSACHUSETTS	28.55%	28.55%

MICHIGAN	24.91%	22.66%
MINNESOTA	15.22%	15.22%
MISSOURI	16.79%	14.54%
MONTANA	20.64%	19.64%
NEBRASKA	22.09%	21.27%
NEW JERSEY	20.46%	18.58%
NEW MEXICO	18.80%	18.50%
NEW YORK	19.74%	18.24%
NORTH DAKOTA	31.96%	31.96%
OHIO	24.19%	24.19%
OKLAHOMA	15.85%	15.85%
OREGON	20.11%	18.68%
PENNSYLVANIA	34.71%	22.71%
SOUTH CAROLINA	29.00%	21.75%
SOUTH DAKOTA	29.47%	29.27%
TENNESSEE	30.83%	28.33%
TEXAS	44.86%	44.86%
WEST VIRGINIA	38.88%	35.40%
WISCONSIN	25.13%	25.13%
WYOMING	53.67%	49.14%
38-JURISDICTION AVERAGE	25.45%	23.27%

The 38-jurisdiction average hourly requirement is 1,490.79 hours.

Table 1C (Manicurist)

Jurisdiction of Manicurist License	Health and Safety Percentage of Curriculum (Assumes 100% of Science in Manicurist Curriculum Is Relevant to Health and Safety)	Modified Health and Safety Percentage of Curriculum (Assumes 25% of Science in Manicurist Curriculum Is Relevant to Health and Safety)
ALABAMA	48.83%	48.83%
ALASKA	96.80%	84.30%
ARKANSAS	38.27%	38.27%
CALIFORNIA	45.15%	45.15%
COLORADO	47.38%	47.38%
DISTRICT OF COLUMBIA	60.11%	47.25%
FLORIDA	31.70%	31.70%
GEORGIA	28.80%	28.80%
HAWAII	44.11%	33.39%
ILLINOIS	32.61%	31.54%
INDIANA	28.25%	26.58%
IOWA	48.16%	37.51%
KANSAS	35.52%	35.52%
KENTUCKY	41.35%	35.10%
MAINE	42.79%	39.79%
MARYLAND	40.70%	29.90%
MASSACHUSETTS	40.89%	37.14%
MICHIGAN	41.98%	38.23%
MINNESOTA	38.02%	36.53%
MISSISSIPPI	21.46%	19.99%

MISSOURI	29.60%	27.72%
MONTANA	25.78%	22.65%
NEBRASKA	23.05%	20.88%
NEW JERSEY	37.02%	34.52%
NEW MEXICO	44.40%	42.64%
NEW YORK	17.50%	16.96%
NORTH DAKOTA	44.34%	44.34%
OHIO	52.63%	48.88%
OKLAHOMA	31.72%	31.72%
OREGON	29.49%	28.54%
PENNSYLVANIA	63.12%	44.37%
SOUTH CAROLINA	45.57%	42.76%
SOUTH DAKOTA	42.06%	36.99%
TENNESSEE	33.80%	30.05%
TEXAS	25.07%	24.66%
WEST VIRGINIA	44.32%	40.85%
WISCONSIN	40.22%	33.72%
WYOMING	29.51%	27.93%
38-JURISDICTION AVERAGE	39.79%	23.27%

The 38-jurisdiction average hourly requirement is 366.39 hours.

Table 2: Calculations of Health and Safety Training

Program	Jx	Curriculum	Hrs. Req.	Code	Code Value	Health / Safety Hrs.	Health / Safety Jx %
Barber	AL	Shampoo	39	E	11.77%	.59	
		Scalp and Hair Treatments	15	Sc.Z	25.37%	43.81	
		Hair Shaping	50	G	3.03%	1.52	
		Hair Styling	285	H	11.32%	32.26	
		Permanent Waving	96	I	17.35%	16.66	
		Chemical Relaxing	15	L	22.92%	3.44	
		Hair Coloring	125	F	12.64%	15.80	
		Skin Care	60	A	53.60%	32.16	
		Science/Sanitation	75	X	100.00%	75.00	
		Unassigned	240	O	0.00%	0.00	
		Total	1000			185.23	18.52%
	AK	Wet Hair Styling and Drying	57	H	11.32%	6.45	
		Thermal Hair Styling and Drying	229	K	32.35%	74.09	
		Permanent Waving	191	I	17.35%	33.14	
		Chemical Straightening	38	L	22.92%	8.71	
		Haircutting	508	G	3.03%	15.39	

		Haircoloring	333	F	12.64%	42.10	
		Scalp and Hair Treatments	5	SSH.Z	34.78%	1.74	
		Beard Trimming	5	SBT.Z	36.93%	1.85	
		Beard Shaving	47	Sh.Z	47.48%	22.32	
		Theoretical Instruction	237	Y	15.22%	36.08	
		Total	1650			241.86	14.66%
	AZ	AZ Study Requirement	250	AZS.Z	78.26%	195.65	
		AZ Study/Practice Requirement	1250	AZSP.Z	18.80%	234.97	
		Total	1500			430.62	28.71%
	AR	Hygiene and Sanitation	80	Z	100.00%	80.00	
		Science	175	X	100.00%	175.00	
		Shaving and Beard Trimming	50	SBT.Z	36.93%	18.47	
		Hairstyling	150	H	11.32%	16.98	
		Chemical Services	345	L	22.92%	79.06	
		Salesmanship	25	S.Z	1.00%	0.25	
		Product Knowledge	25	P.Z	25.00%	6.25	
		Haircutting and Bobbing	425	G	3.03%	12.88	
		Waving	150	I	17.35%	26.03	
		Management	65	P	25.00%	16.25	
		Department	10	A1	1.00%	0.10	
		Total	1500			431.27	28.75%
	CA	Hairstyling	425	H	11.32%	48.11	
		Waving/Straightening	355	IL.Z	20.13%	71.48	
		Coloring/Bleaching	235	F	12.64%	29.71	
		Cutting	100	G	3.03%	3.03	
		Shaving	200	SBT.Z	36.93%	73.86	
		Laws/Regs	37	W	100.00%	37.00	
		Health/Safety Considerations	83.25	Z	100.00%	83.25	
		Disinfection/Sanitation	37	Z	100.00%	37.00	
		Anatomy/Physiology	27.75	R	100.00%	27.75	
		Total	1500			411.19	27.41%
	CO	Treatment of Hair and Scalp	60	M	9.17%	5.50	
		Facial Massage and Treatments	90	FM.Z	18.47%	16.62	
		Shaving	90	SBT.Z	36.93%	33.24	

		Haircutting	270	G	3.03%	8.18	
		Hairstyling	270	H	11.32%	30.57	
		Chemical Hair Services	240	L	22.92%	55.00	
		Hair Coloring and Tinting	240	F	12.64%	30.34	
		Law, Rules, and Regulations	30	W	100.00%	30.00	
		Management, Ethics, etc.	30	SM.Z	13.00%	3.90	
		Disinfection/Cleaning/Safety	180	Z	100.00%	180.00	
		Total	1500			393.35	26.22%
	CT	Sanitation and Hygiene	35	Z	100.00%	35.00	
		Anatomy and Physiology	15	R	100.00%	15.00	
		Chemical Procedures (Coloring, Waving, and Relaxing)	130	FIL	17.64%	22.93	
		Hair Care and Treatment	60	EM	10.47%	6.28	
		Skin Care, Facials, Makeup, and Manicuring	45	ABCD	26.48%	11.92	
		Hair Shaping, Styling, and Shaving (Includes Wiggery)	690	H.A2	14.04%	96.88	
		Business and Professional Relations	20	ZZC	40.60%	8.12	
		State Law	5	W	100.00%	5.00	
		Total	1000			201.12	20.11%
	DE	History; Laws	50	WH.Z	50.50%	25.25	
		Professional Image	62.5	A1	1.00%	0.63	
		Bacteriology	100	Z	100.00%	100.00	
		Sterilization/Sanitation	120	Z	100.00%	120.00	
		Tools/Equipment	130	P.Z	25.00%	32.50	
		Skin Disorders	30	A	53.60%	16.08	
		Hair and Scalp	150	Sc.Z	25.37%	38.06	
		Facial Massage	82.5	FM.Z	18.47%	15.24	
		Shaving	87.5	SBT.Z	36.93%	32.31	
		Haircutting	210	G	3.03%	6.36	
		Mustache/Bear Design	45	SBT.Z	36.93%	16.62	
		Permanent Wave	120	I	17.35%	20.82	

		Chemical Relaxing	55	L	22.92%	12.60	
		Hair Coloring	90	F	12.64%	11.38	
		Hairpieces	80	A2	7.14%	5.71	
		Manicuring	20	D	18.45%	3.69	
		Electricity	40	S	100.00%	40.00	
		Chemistry	10	T	100.00%	10.00	
		Unspecified	17.5	O	0.00%	0.00	
		Total	1500			507.25	33.82%
	DC	Manicuring/Pe dicuring	50	DU	19.50%	9.75	
		Pressing	100	K	32.35%	32.35	
		Croquignole Wave/Styling	100	HI	14.34%	14.34	
		Braiding	35	E3	4.38%	1.53	
		Shampooing	40	E	11.77%	4.71	
		Permanent Wave	150	I	17.35%	26.03	
		Wet Curls	100	H	11.32%	11.32	
		Facials/Massa ge	50	B	26.67%	13.33	
		Scalp Treatments	25	Sc.Z	25.37%	6.34	
		Dye/Bleach	100	F	12.64%	12.64	
		Haircutting	100	G	3.03%	3.03	
		Hairpieces	25	A2	7.14%	1.79	
		Chemical Straightening	225	L	22.92%	51.56	
		Electrology	75	X	100.00%	75.00	
		Personal Hygiene	50	Z	100.00%	50.00	
		Ethics/Salesm anship	25	D1	25.00%	6.25	
		Courtesy/Cond uct/Law	50	LMDE	37.75%	18.88	
		Sciences	150	X	100.00%	150.00	
		Sanitation	50	Z	100.00%	50.00	
		Total	1500			538.85	35.92%
	FL	Laws/Rules	225	W	100.00%	225.00	
		Safety/Sanitiza tion/Sterilizati on	270	Z	100.00%	270.00	
		Hair Structure and Chemistry	90	HsC.Z	28.85%	25.97	
		Haircutting	135	G	3.03%	4.09	
		Shampooing	45	E	11.77%	5.30	
		Chemical Services	90	L	22.92%	20.63	
		Shaving/Beard /Mustache	45	SBT.Z	36.93%	16.62	
		Total	900			567.60	63.07%
	GA	Theory	50	TSL.Z	100.00%	50.00	
		Hair and Scalp/Shampoo	25	ScS.Z	18.55%	4.64	

		ing/Conditioni ng					
		Shaving	25	SBT.Z	36.93%	9.23	
		Hair Coloring	25	F	12.64%	3.16	
		Hair Cutting and Styling	70	D4	7.18%	5.02	
		Facial Hair Design and Waxing	20	SFM.Z	22.43%	4.49	
		Waving/Relaxi ng/Chemical Application	65	L	22.92%	14.90	
		Advanced Theory	200	X	100.00%	200.00	
		Advanced Hairstyling	500	D4	7.18%	35.88	
		Advanced Shaving	25	SBT.Z	36.93%	9.23	
		Advanced Shampooing	5	E	11.77%	0.59	
		Advanced Facial Hair Design and Waxing	10	SFM.Z	22.43%	2.24	
		Advanced Scalp Treatment Techniques	10	Sc.Z	25.37%	2.54	
		Advanced Waving/Relaxi ng/Chemical Application	270	L	22.92%	61.88	
		Unassigned	200	O	0.00%	0.00	
		Total	1500			403.79	26.92%
	HI	Theory	250	HIT.Z	33.53%	83.83	
		Haircutting/H airstyling	747.5	D4	7.18%	53.64	
		Haircoloring/R elaxing	102.5	FL	17.78%	18.22	
		Permanent Waving	132.5	I	17.35%	22.99	
		Shampooing	75	E	11.77%	8.83	
		Shaving/Beard Trimming	35	SBT.Z	36.93%	12.93	
		Facials	20	B	26.67%	5.33	
		Scalp Treatments	10	Sc.Z	25.37%	2.54	
		Sales and Management	52.5	SM.Z	13.00%	6.83	
		Sanitation and Sterilization	75	Z	100.00%	75.00	
		Total	1500			290.13	19.34%
	ID	No Subfield Hourly Requirements	900				

	IL	No Subfield Hourly Requirements	1500				
	IN	Sanitation and Sterilization	40	Z	100.00%	40.00	
		Laws and Rules	20	W	100.00%	20.00	
		Salesmanship	15	S.Z	1.00%	0.15	
		Management	10	P	25.00%	2.50	
		Skin	10	A	53.60%	5.36	
		Hair	10	SC.Z	25.37%	2.54	
		Facials	45	FM.Z	18.47%	8.31	
		Hairstyling	225	H	11.32%	25.47	
		Electricity/Light Therapy	10	X	100.00%	10.00	
		Chemistry	10	X	100.00%	10.00	
		Shampoo/Massage	70	FMS.Z	15.12%	10.58	
		Scalp Treatments	35	Sc.Z	25.37%	8.88	
		History of Barbering	10	HB.Z	1.00%	0.10	
		Shaving/Shaping	45	SBT.Z	36.93%	16.62	
		Honing and Stropping	15	Sh.Z	47.48%	7.12	
		Personal Hygiene/Ethics	10	EH.Z	62.50%	6.25	
		Equipment Care	10	H3	25.00%	2.50	
		Hair Coloring	130	F	12.64%	16.43	
		Waving and Relaxing	265	IL	20.13%	53.36	
		Haircuts	300	G	3.03%	9.09	
		Anatomy/Physiology	15	X	100.00%	15.00	
		Hairpieces	50	A2	7.14%	3.57	
		Discretionary	150	O	0.00%	0.00	
		Total	1500			273.84	18.26%
	IA	IA Supervised Practical Instruction	1675	IA.SPI.Z	19.50%	326.68	
		IA Demonstrations and Lectures	380	IA.DL.Z	46.70%	177.47	
		IA Special Lectures	45	IA.L.Z	5.00%	2.25	
		Total	2100			506.40	24.11%
	KS	Scientific Fundamentals of Barbering	150	X	100.00%	150.00	
		Histology of Hair and Skin	10	SSH.Z	34.78%	3.48	
		Anatomy	10	R	100.00%	10.00	

		Skin/Scalp/Hair	10	SSH.Z	34.78%	3.48	
		Electricity	2	S	100.00%	2.00	
		Sterilization and Antiseptics/Chemistry	10	Z	100.00%	10.00	
		Chemistry	2	T	100.00%	2.00	
		Sanitation/Sterilization	20	Z	100.00%	20.00	
		Hygiene/First Aid	5	Z	100.00%	5.00	
		Bacteriology	5	Z	100.00%	5.00	
		Scalp/Shampoo	35	ScS.Z	18.55%	6.49	
		Instruments	5	H3	25.00%	1.25	
		Economics/Equipment/Management	15	EEM.Z	16.00%	2.40	
		History of Barbering	5	HB.Z	1.00%	0.05	
		Singeing/Hair Tonics	2	H3	25.00%	0.50	
		Soaps/Shampoos/Tonics	5	EM	10.47%	0.52	
		Facial/Massage	25	FM.Z	18.47%	4.62	
		Honing and Stropping	2	SBT.Z	36.93%	0.74	
		Shaving	120	SBT.Z	36.93%	44.32	
		Haircutting	625	G	3.03%	18.94	
		Hairstyling and Arrangement	40	H	11.32%	4.53	
		Permanent Waving	30	I	17.35%	5.21	
		Coloring	42	F	12.64%	5.31	
		Law/Ethics	25	LE.Z	62.50%	15.63	
		Total	1200			321.45	26.79%
	KY	Instruments	30	H3	25.00%	7.50	
		Shaving Instructions	100	Sh.Z	47.48%	47.48	
		Haircutting	935	G	3.03%	28.33	
		Shampooing	40	E	11.77%	4.71	
		Permanent Wave	40	I	17.35%	6.94	
		Hair Coloring	40	F	12.64%	5.06	
		Hair Straightening	40	L	22.92%	9.17	
		Massaging	35	FM.Z	18.47%	6.46	
		Scalp and Skin Diseases	20	Sc.Z	25.37%	5.07	
		Physiology and Anatomy	100	R	100.00%	100.00	
		Sterilization and Sanitation	40	Z	100.00%	40.00	
		Hygiene	10	Z	100.00%	10.00	
		Bacteriology	20	Z	100.00%	20.00	

		Electricity	10	S	100.00%	10.00	
		Pharmacology	20	Z	100.00%	20.00	
		Psychology	10	A1	1.00%	0.10	
		History/Ethics	10	A1	1.00%	0.10	
		Total	1500			320.93	21.40%
	LA	No Subfield Hourly Requirements	1500				
	ME	Bacteriology, Infection Control, Sanitation, etc.	35	Z	100.00%	35.00	
		General Sciences	85	X	100.00%	85.00	
		Business Management/L aw/Electives	115	MLE. Z	41.66%	47.91	
		Use of Equipment	25	H3	25.00%	6.25	
		Haircutting	500	G	3.03%	15.15	
		Hairstyling, Incl. Thermal	105	Ht.Z	16.65%	17.48	
		Waving/Colori ng/Straighteni ng	445	FIL	17.64%	78.48	
		Shampooing/Sc alp Care	40	ScS.Z	18.55%	7.42	
		Beards/Shavin g/Facials	90	SFM.Z	22.43%	20.19	
		Manicuring	40	D	18.45%	7.38	
		Wiggery	20	A2	7.14%	1.43	
		Total	1500			321.69	21.45%
	MD	History of Barbering	6	HB.Z	1.00%	0.06	
		Image	18	HB.Z	1.00%	0.18	
		Implements and Tools	40	P.Z	25.00%	10.00	
		Haircutting/H airstyling	452	HH.Z	7.19%	32.50	
		Hair and Scalp	37	Sc.Z	25.37%	9.39	
		Hair Replacement	32	A2	7.14%	2.29	
		Facial Massage	32	FM.Z	18.47%	5.91	
		Shaving and Design	70	SBT.Z	36.93%	25.85	
		Microbiology/C hemistry	49	T	100.00%	49.00	
		Infection Control	60	Z	100.00%	60.00	
		Anatomy/Physi ology	27	R	100.00%	27.00	
		Electricity/Lig ht Therapy	23	S	100.00%	23.00	

		Skin Properties and Disorders	40	A	53.60%	21.44	
		Hair and Scalp Properties and Disorders	40	Sc.Z	25.37%	10.15	
		Women Haircutting and Styling	36	HH.Z	7.19%	2.59	
		Chemical Texture Service	57	L	22.92%	13.06	
		Coloring	60	F	12.64%	7.58	
		Nails and Manicuring	28	D	18.45%	5.17	
		Board Preparations/Licensing Laws	37	MLE.Z	41.66%	15.41	
		Job Search	36	HB.Z	1.00%	0.36	
		Management	17	P	25.00%	4.25	
		Career Education/Study Skills	3	HB.Z	1.00%	0.03	
		Total	1200			325.22	27.10%
	MA	Cleaning and Disinfection	80	Z	100.00%	80.00	
		Shampooing	10	E	11.77%	1.18	
		Hair Cutting and Styling	400	D4	7.18%	28.70	
		Hair Coloring	75	F	12.64%	9.48	
		Permanent Waving	90	I	17.35%	15.62	
		Chemical Relaxing	40	L	22.92%	9.17	
		Scalp Manipulations and Treatments	15	Sc.Z	25.37%	3.81	
		Shaving	50	Sh.Z	47.48%	23.74	
		Honing and Stropping	10	Sh.Z	47.48%	4.75	
		Mustaches/Beards	20	SBT.Z	36.93%	7.39	
		Facials	20	FM.Z	18.47%	3.69	
		Light Therapy	5	X	100.00%	5.00	
		Shop Management	20	P	25.00%	5.00	
		Theory (Unspecified)	165	P	25.00%	41.25	
		Total	1000			238.77	23.88%
	MI	Orientation (History/Equipment)	10	HE.Z	13.00%	1.30	
		Safety/Sanitization/Sterilization	110	Z	100.00%	110.00	
		Client Services	130	CS.Z	47.36%	61.56	

		Haircutting/H airstyling/Sh aving/Beard Trimming	1060	HHSB .Z	20.81%	220.59	
		Shampoo, Waving/Relaxi ng, Coloring	395	EFL.Z	14.83%	58.58	
		Facials/Massa ge, Hair/Scalp, Wiggery	270	FSW. Z	16.99%	45.87	
		Laws/Rules/Re gulations	10	W	100.00%	10.00	
		Management	15	P	25.00%	3.75	
		Total	2000			511.65	25.58%
	MN	No Subfield Hourly Requirements	1500				
	MS	History	5	HB.Z	1.00%	0.05	
		Sanitation/Hyg iene	25	Z	100.00%	25.00	
		Tools/Shaving/ Beard/Haircutt ing/Styling	5	P.Z	25.00%	1.25	
		Wiggery	5	A2	7.14%	0.36	
		Coloring/Strai ghtening	5	FL	17.78%	0.89	
		Hair Structure and Chemicals	75	HsC.Z	28.85%	21.64	
		Massage/Facia ls	5	FM.Z	18.47%	0.92	
		Disorders of Skin/Scalp/Hai r	10	SSH.Z	34.78%	3.48	
		Laws/Rules/Re gulations	5	W	100.00%	5.00	
		Management/S alesmanship	10	SM.Z	13.00%	1.30	
		Review	20	MS.R. Z	26.45%	5.29	
		Haircutting	900	G	3.03%	27.27	
		Shaving	25	SBT.Z	36.93%	9.23	
		Hair Coloring	70	F	12.64%	8.85	
		Scalp/Hair Treatment/Sham poo	50	ScS.Z	18.55%	9.28	
		Facials	20	FM.Z	18.47%	3.69	
		Razor and Styling	50	SBT.Z	36.93%	18.47	
		Wiggery	20	A2	7.14%	1.43	
		Unassigned	195	O	0.00%	0.00	
		Total	1500			143.39	9.56%
	MO	History	5	A1	1.00%	0.05	
		Image	5	A1	1.00%	0.05	
		Bacteriology	5	Z	100.00%	5.00	
		Sterilization/S anitation	20	Z	100.00%	20.00	

		Equipment	15	H3	25.00%	3.75	
		Properties of Skin/Scalp/Hair	15	SSH.Z	34.78%	5.22	
		Hair/Scalp	20	Sc.Z	25.37%	5.07	
		Facial Massage	5	FM.Z	18.47%	0.92	
		Shaving	35	Sh.Z	47.48%	16.62	
		Haircutting	425	G	3.03%	12.88	
		Hairstyling	325	H	11.32%	36.79	
		Mustaches/Beards	5	SBT.Z	36.93%	1.85	
		Permanent Waving	30	I	17.35%	5.21	
		Hair Relaxing/Permanents	30	L	22.92%	6.88	
		Coloring	30	F	12.64%	3.79	
		Wiggery	5	A2	7.14%	0.36	
		Chemistry	5	T	100.00%	5.00	
		Anatomy/Physiology	5	R	100.00%	5.00	
		Salesmanship/Management	5	SM.Z	13.00%	0.65	
		State Law	10	W	100.00%	10.00	
		Total	1000			145.08	14.51%
	MT	Haircutting	185	G	3.03%	5.61	
		Shampoo/Scalp/Styling (with Thermal & Wiggery)	165	SSS+.Z	25.40%	41.91	
		Skin Care	45	A	53.60%	24.12	
		Chemical Services	295	L	22.92%	67.60	
		Sciences/Sanitation/Disorders	60	Z	100.00%	60.00	
		Management/Sanitation/Business Methods/Laws & Rules	75	MSBL.Z	70.00%	52.50	
		Discretionary	275	O	0.00%	0.00	
		Total	1100			251.74	22.89%
	NE	Orientation (Theory I)	600	NE1.Z	33.18%	199.08	
		Haircut	150	G	3.03%	4.55	
		Haircut	100	G	3.03%	3.03	
		Shampoo	33.33	E	11.77%	3.92	
		Shave	15	Sh.Z	47.48%	7.12	
		Beard Trim	6.67	SBT.Z	36.93%	2.46	
		Facial	24	FM.Z	18.47%	4.43	
		Chemical Wave	72	L	22.92%	16.50	
		Braiding	90	E3	4.38%	3.94	
		Permanent	30	I	17.35%	5.21	

		Coloring	70	F	12.64%	8.85	
		Highlighting	15	F	12.64%	1.90	
		Theory II	594	NE2.Z	64.02%	380.28	
		Total	1800			641.26	35.63%
	NV	Haircuts	867	G	3.03%	26.27	
		Shaves	92	Sh.Z	47.48%	43.69	
		Shampoos	30	E	11.77%	3.53	
		Scalp Treatments	10	Sc.Z	25.37%	2.54	
		Facials	61	FM.Z	18.47%	11.27	
		Tonic Applications	10	Sc.Z	25.37%	2.54	
		Hair Coloring	65	F	12.64%	8.22	
		Hair Straightening	55	L	22.92%	12.60	
		Styling	92	H	11.32%	10.42	
		Hairpiece Fitting	18	A2	7.14%	1.29	
		Theory	200	NV.T. Z	50.20%	100.40	
		Total	1500			222.75	14.85%
	NH	No Subfield Hourly Requirements	800				
	NJ	Law/Rules/Reg ulations	10	W	100.00%	10.00	
		History of Barbering	4	HB.Z	1.00%	0.04	
		Image/Hygiene	2	IH	50.00%	1.00	
		Decontaminati on/Infection Control	20	Z	100.00%	20.00	
		Shampooing	20	E	11.77%	2.35	
		Honing and Stropping	4	Sh.Z	47.48%	1.90	
		Shaving	125	Sh.Z	47.48%	59.36	
		Haircutting and Styling	225	D4	7.18%	16.14	
		Beards/Mustac hes	15	SBT.Z	36.93%	5.54	
		Women's Haircutting and Styling	70	D4	7.18%	5.02	
		Facials/Massa ges	15	FM.Z	18.47%	2.77	
		Anatomy of Head/Neck/Fac e	5	R	100.00%	5.00	
		Disorders of Skin/Scalp/Hai r	5	SSH.Z	34.78%	1.74	
		Electricity	5	S	100.00%	5.00	
		Wiggery	55	A2	7.14%	3.93	

		Chemical Straightening/Waving	210	L	22.92%	48.13	
		Coloring	110	F	12.64%	13.91	
		Total	900			201.82	22.42%
	NM	Theory	75	NMT.Z	70.83%	53.13	
		Sterilization/Sanitation	75	Z	100.00%	75.00	
		Shampoo/Scalp Treatments	75	ScS.Z	18.55%	13.91	
		Permanents/Relaxers	200	IL	20.13%	40.27	
		Hairstyling	150	H	11.32%	16.98	
		Haircoloring	125	F	12.64%	15.80	
		Haircutting/Beard Trimming	250	BH.Z	19.98%	49.95	
		Facials	175	FM.Z	18.47%	32.32	
		Business/Retail	50	P	25.00%	12.50	
		Miscellaneous/Unassigned	25	O	0.00%	0.00	
		Total	1200			309.86	25.82%
	NY	No Subfield Hourly Requirements	[none]				
	NC	Hygiene/Ethics	25	EH.Z	62.50%	15.63	
		Bacteriology/Sterilization	50	Z	100.00%	50.00	
		Implements, Honing/Stropping, Shaving	30	IS.Z	36.24%	10.87	
		Haircutting	20	G	3.03%	0.61	
		Hairstyling/Beards	10	BS.Z	24.13%	2.41	
		Shampoo/Scalp Treatments	10	ScS.Z	18.55%	1.86	
		Massage/Facial	5	FM.Z	18.47%	0.92	
		Razor	30	SBT.Z	36.93%	11.08	
		Waving/Curling	5	I	17.35%	0.87	
		Permanents/Relaxing/Blowdrying	25	IKL	24.21%	6.05	
		Coloring	10	F	12.64%	1.26	
		Hairpieces	5	A2	7.14%	0.36	
		Skin/Scalp/Hair	30	SSH.Z	34.78%	10.43	
		Disorders of Skin/Scalp Hair	15	SSH.Z	34.78%	5.22	
		Anatomy/Physiology	10	R	100.00%	10.00	
		Electricity/Chemistry	10	ST	100.00%	10.00	

		Management/Product Knowledge	70	P.Z	25.00%	17.50	
		Laws/History	20	WH.Z	50.50%	10.10	
		Shampoo/Scalp Treatments	55	ScS.Z	18.55%	10.20	
		Shaving	50	SBT.Z	36.93%	18.47	
		Haircutting	250	G	3.03%	7.58	
		Hairstyling	400	BS.Z	24.13%	96.50	
		Massage/Facial	10	FM.Z	18.47%	1.85	
		Coloring	90	F	12.64%	11.38	
		Hairpieces	5	A2	7.14%	0.36	
		Straightening	5	L	22.92%	1.15	
		Hair/Skin Disorders	10	SSH.Z	34.78%	3.48	
		Shampoo/Scalp Treatments	15	ScS.Z	18.55%	2.78	
		Shaving	20	SBT.Z	36.93%	7.39	
		Haircutting	70	G	3.03%	2.12	
		Hairstyling	100	BS.Z	24.13%	24.13	
		Massage/Facial	5	FM.Z	18.47%	0.92	
		Coloring	30	F	12.64%	3.79	
		Hairpieces	5	A2	7.14%	0.36	
		Straightening	3	L	22.92%	0.69	
		Hair/Skin Disorders	10	SSH.Z	34.78%	3.48	
		Razor	15	SBT.Z	36.93%	5.54	
		Total	1528			367.31	24.04%
	ND	No Subfield Hourly Requirements	1550				
	OH	OH Theoretical Study	100	OH.T.Z	66.88%	66.88	
		OH Scientific Barbering Practice	200	OH.S.Z	14.50%	28.99	
		OH General Barber Practice	1200	OH.G.Z	16.14%	193.74	
		Unassigned	300	O	0.00%	0.00	
		Total	1800			289.61	16.09%
	OK	Safety	155	Z	100.00%	155.00	
		Salesmanship/Image/History/Job Search/Management	175	SIHJ M.Z	5.20%	9.10	
		Sciences/Skin, Scalp, and Hair Treatments	200	XSSH.Z	73.91%	147.82	
		Facial Massage	40	FM.Z	18.47%	7.39	

		Haircutting and Styling	580	D4	7.18%	41.62	
		Relaxing/Permanents/Waving	95	IL	20.13%	19.13	
		Coloring	150	F	12.64%	18.96	
		Hairpieces/Beard and Shaving	65	WSBT.Z	22.04%	14.32	
		Rules/Regulations	40	W	100.00%	40.00	
		Total	1500			453.34	30.22%
	OR	Shaving	80	SBT.Z	36.93%	29.54	
		Styling	157.5	H	11.32%	17.83	
		Mustache/Beard Trimming	60	SBT.Z	36.93%	22.16	
		Haircut	320	G	3.03%	9.70	
		Facial Massage	40	FM.Z	18.47%	7.39	
		Hair/Scalp	30	Sc.Z	25.37%	7.61	
		Microbiology	8	Z	100.00%	8.00	
		Anatomy/Physiology	22	R	100.00%	22.00	
		Tools	5.5	P.Z	25.00%	1.38	
		Product Knowledge	9	P.Z	25.00%	2.25	
		Safety/Law	14	Z	100.00%	14.00	
		Career Development	20	A1	1.00%	0.20	
		Law/Rules	20	W	100.00%	20.00	
		Total	786			162.05	20.62%
	PA	Honing and Stropping	25	SBT.Z	36.93%	9.23	
		Shaving/Straight Razor	240	SBT.Z	36.93%	88.63	
		Haircutting/Hairstyling/Hairpieces	535	J1	7.17%	38.35	
		Shampoo/Scalp Massages	25	FMS.Z	15.12%	3.78	
		Haircoloring	25	F	12.64%	3.16	
		Facial Massage	25	FM.Z	18.47%	4.62	
		Hair Waving/Curling/Straightening	25	L	22.92%	5.73	
		Scalp/Skin Disease	50	SSH.Z	34.78%	17.39	
		Law/Rules/Regulations	50	W	100.00%	50.00	
		Physiology	50	R	100.00%	50.00	
		Sterilization/Sanitization	50	Z	100.00%	50.00	
		Hygiene/Ethics	25	EH.Z	62.50%	15.63	
		Bacteriology	25	Z	100.00%	25.00	
		Electricity	25	S	100.00%	25.00	

		Ethics/Demeanor	25	ESC	10.42%	2.60	
		Management/Product Knowledge/Instruments	50	P	25.00%	12.50	
		Total	1250			401.63	32.13%
	RI	No Subfield Hourly Requirements	1500				
	SC	No Subfield Hourly Requirements	1500				
	SD	No Subfield Hourly Requirements	1500				
	TN	General (Incl. Sterilization, Anatomy, Ethics, Law, Etc.)	240	TN.G.Z	35.91%	86.19	
		Chemical (Incl. Waves, Relaxers, Color, Nails, Etc.)	360	TN.C.Z	17.84%	64.23	
		Physical (Incl. Shampoo, Scalp Care, Etc.)	900	TN.P.Z	15.68%	141.15	
		Total	1500			291.57	19.44%
	TX	Basic (Incl. Anatomy, Skin Disorders, Chemical Services, Etc.)	150	TX.R.Z	54.23%	81.34	
		Practice (Incl. Shaving, Beards, Haircutting, Etc.)	750	TX.P.Z	26.87%	201.50	
		Business (Incl. Law, Customer Service, Management, Etc.)	100	TX.B.Z	51.74%	51.74	
		Total	1000			334.58	33.46%
	UT	No Subfield Hourly Requirements	1000				

	VT	No Subfield Hourly Requirements	750				
	VA	VA Theory	650	VA.T. Z	33.32%	216.57	
		Hair/Scalp	2	Sc.Z	25.37%	0.51	
		Hair Services	320	VA.H. Z	9.71%	31.08	
		Coloring	123	F	12.64%	15.55	
		Facials	5	FM.Z	18.47%	0.92	
		Total	1100			264.63	24.06%
	WA	No Subfield Hourly Requirements	1000				
	WV	Professional Information	100	WV1.Z	58.33%	58.33	
		Introduction	3	WV2.Z	0.50%	0.02	
		Science	350	WV3.Z	79.97%	279.89	
		Professional Barbering	747	WV4.Z	21.51%	160.66	
		Total	1200			498.90	41.57%
	WI	Hygiene/Groo ming/Personal Development	5	HGPD .Z	66.67%	3.33	
		Bacteriology/St erilization	25	Z	100.00%	25.00	
		Tools/Equipme nt	13	P.Z	25.00%	3.25	
		WI Hair Services	500	WI.H. Z	20.65%	103.27	
		WI Chemical Services	337	WI.C. Z	34.70%	116.93	
		WI Shaving Services	50	WI.S. Z	43.80%	21.90	
		Hair/Skin/Scal p	15	SSH.Z	34.78%	5.22	
		Product Knowledge	15	P.Z	25.00%	3.75	
		Laws/Ethics/H istory	18	Wetc	42.00%	7.56	
		Electives	22	O	0.00%	0.00	
		Total	1000			290.21	29.02%
	WY	Science of Hairstyling	150	WY.S. Z	69.77%	104.65	
		General Cosmetology	500	WY.C. Z	8.37%	41.85	
		Chemical Services	250	WY.C h.Z	17.78%	44.45	
		Infection Control and Professional Standards	100	WY.I	62.50%	62.50	
		Total	1000			253.45	25.34%

Cosmetologist	AL	Shampooing	57.5	E	11.77%	6.77	
		Scalp & Hair Treatments	22.5	M	9.17%	2.06	
		Manicure	26.5	D	18.45%	4.89	
		Hair Shaping	75	G	3.03%	2.27	
		Hair Styling	415	H	11.32%	46.98	
		Permanent Waving	140	I	17.35%	24.29	
		Chemical Relaxing	22.5	L	22.92%	5.16	
		Hair Coloring	182.5	F	12.64%	23.07	
		Skin Care	87.5	A	53.60%	46.90	
		Brow and Lash Care	16	N	59.00%	9.44	
		Science and Related Services	107.5	X	100.00%	107.50	
		Unassigned	347.5	O	0.00%	0.00	
		Total	1500			279.33	18.62%
	AK	Wet Hair Styling and Drying	314.10	H.E	11.41%	35.84	
		Thermal Hairstyling	209.40	K	32.35%	67.75	
		Permanent Waving	279.20	I	17.35%	48.45	
		Chemical Straightening	34.90	L	22.92%	8.00	
		Haircutting	218.13	G	3.03%	6.61	
		Coloring and Bleach	305.38	F	12.64%	38.60	
		Scalp and Hair Treatments (Incl. Electric Manipulation)	1.94	E.S	13.59%	0.26	
		Beard Trimming	1.94	SS	26.38%	0.51	
		Eyebrow and Hair Removal	26.18	N	59.00%	15.44	
		Makeup	26.18	C	7.20%	1.88	
		Manicure	17.45	D	18.45%	3.22	
		Theoretical Instruction (Multiple Subfields)	215.22	Y	15.22%	32.76	
		Total	1650.00			258.88	15.69%
	AZ	No Subfield Hourly Requirements	1600				
	AR	Hygiene and Sanitation	80	Z	100.00%	80.00	
		Related Science	120	X	100.00%	120.00	

		Arkansas Hairdressing	1000	EGF	14.68%	146.80	
		Manicuring	100	D	18.45%	18.45	
		Aesthetics	100	B1	53.60%	53.60	
		Salesmanship/ Management/L aw	50	SLM. A	50.00%	25.00	
		Courtesy/Neat ness/Attitude	50	A1	1.00%	0.50	
		Total	1500			444.35	29.62%
	CA	Hairstyling	426.9 4	H	11.32%	48.33	
		Waving and Straightening	356.6 2	IL	20.13%	71.80	
		Coloring and Bleaching	236.0 7	F	12.64%	29.84	
		Haircutting	80.37	G	3.03%	2.44	
		Health and Safety	200.0 0	Z	100.00%	200.00	
		Facials	96.30	B	26.67%	25.68	
		Eyebrows and Makeup	103.7 0	BCN	30.96%	32.10	
		Manicuring	22.44	D	18.45%	4.14	
		Pedicuring	22.44	U	20.56%	4.61	
		Artificial Nails and Wraps	55.13	B2	3.57%	1.97	
		Total	1600			420.92	26.31%
	CO	Scalp Care (Shampooing/R insing/Conditio ning)	50	EM	10.47%	5.24	
		Hair Coloring/Tinti ng/Bleaching	200	F	12.64%	25.28	
		Haircutting	200	G	3.03%	6.06	
		Hairstyling	175	H	11.32%	19.81	
		Chemical Texture Services	100	L	22.92%	22.92	
		Manicuring & Pedicuring	175	DU	19.50%	34.13	
		Application of Artificial Nails	125	Nartf. Y	8.72%	10.90	
		Facials/Skin Care	175	AB	40.13%	70.23	
		Facial Makeup	25	C	7.20%	1.80	
		Hair Removal	75	E2	46.53%	34.90	
		Law, Rules, and Regulations	25	Z	100.00%	25.00	
		Management, Ethics, Interpersonal Skills, etc.	25	SM.Z	13.00%	3.25	
		Disinfection/Cl eaning/Safety	150	Z	100.00%	150.00	
		Total	1500			409.52	27.30%

	CT	Sanitation and Hygiene	35	Z	100.00%	35.00	
		Anatomy and Physiology	15	R	100.00%	15.00	
		Chemical Procedures (Coloring, Waving, and Relaxing)	230	FIL	17.64%	40.56	
		Hair Care and Treatment	220	EM	10.47%	23.04	
		Skin Care, Facials, Makeup, and Manicuring	150	ABCD	26.48%	39.72	
		Hair Shaping, Styling, and Shaving (Includes Wiggery)	825	H.A2	14.04%	115.84	
		Business and Professional Relations	20	ZZC	40.60%	8.12	
		State Law	5	Z	100.00%	5.00	
		Total	1500			282.28	18.82%
	DE	No Subfield Hourly Requirements	1500				
	DC	Manicuring/Pedicuring	50	DU	19.50%	9.75	
		Pressing	100	K	32.35%	32.35	
		Croquignole Wave/Styling	100	HI	14.34%	14.34	
		Braiding	35	E3	4.38%	1.53	
		Shampooing	40	E	11.77%	4.71	
		Permanent Wave	150	I	17.35%	26.03	
		Wet Curls	100	H	11.32%	11.32	
		Facials/Massage	50	B	26.67%	13.33	
		Scalp Treatments	25	M	9.17%	2.29	
		Dye/Bleach	100	F	12.64%	12.64	
		Haircutting	100	G	3.03%	3.03	
		Hairpieces	25	A2	7.14%	1.79	
		Chemical Straightening	225	L	22.92%	51.56	
		Electrology	75	X	100.00%	75.00	
		Personal Hygiene	50	Z	100.00%	50.00	
		Ethics/Salesmanship	25	D1	25.00%	6.25	
		Courtesy/Conduct/Law	50	LMDE	37.75%	18.88	
		Sciences	150	X	100.00%	150.00	
		Sanitation	50	Z	100.00%	50.00	

		Total	1500			534.80	35.65%
	FL	FL Education Requirements	21	C1	92.38%	19.40	
		Electricity	8	S	100.00%	8.00	
		Facials	66	B	26.67%	17.60	
		Product Chemistry	8	T	100.00%	8.00	
		Hair Removal	2.5	N	59.00%	1.48	
		Makeup	2	C	7.20%	0.14	
		Skin	85	A	53.60%	45.56	
		Law, Rules, and Regulations	47.29	W	100.00%	47.29	
		Sanitation and Disinfection	47.29	Z	100.00%	47.29	
		Facial Services	10	B	26.67%	2.67	
		Hair-Shaping Services	56.25	G	3.03%	1.70	
		Scalp Services	7.5	M	9.17%	0.69	
		Shampoo Services	16.67	E	11.77%	1.96	
		Hairstyling Services	450	H	11.32%	50.94	
		Haircoloring Services	157.5	F	12.64%	19.91	
		Waving/Relaxing Services	195	IL	20.13%	39.26	
		Manicure/Pedicure Services	20	DU	19.50%	3.90	
		Total	1200			315.79	26.32%
	GA	Theory	40	C2	100.00%	40.00	
		Permanent Waving	45	I	17.35%	7.81	
		Hair Coloring	45	F	12.64%	5.69	
		Hair and Scalp Treatments and Conditioning	20	M	9.17%	1.83	
		Hair Cutting	25	G	3.03%	0.76	
		Shampooing	15	E	11.77%	1.77	
		Hairdressing	35	H	11.32%	3.96	
		Nail Care and Skin Care	25	DVA	35.97%	8.99	
		Theory	100	c2.g	43.75%	43.75	
		Social Skills	50	C2P	6.25%	3.13	
		Laboratory	50	X	100.00%	50.00	
		Hairdressing/Shampoo	255	H.E	11.41%	29.10	
		Haircutting/Shaping	124.5	G	3.03%	3.77	
		Permanent Wave	150	I	17.35%	26.03	
		Hair Relaxing	139	L	22.92%	31.85	
		Hair Coloring	155	F	12.64%	19.59	
		Scalp and Hair Treatment	49	M	9.17%	4.49	

		Facials/Makeup/Hair Removal	52.5	BCN	30.96%	16.25	
		Hair Removal	30	N	59.00%	17.70	
		Sanitizing and Disinfection	5	Z	100.00%	5.00	
		Manicures/Pedicures	90	DU	19.50%	17.55	
		Total	1500			339.03	22.60%
	HI	Theory	200	C2.H	76.42%	152.84	
		Shop Management	100	P	25.00%	25.00	
		Unassigned	250	O	0.00%	0.00	
		Haircutting	150	G	3.03%	4.55	
		Scalp and Hair Treatments	50	M	9.17%	4.59	
		Hairdressing and Shampooing	350	H.E	11.41%	39.94	
		Permanent Waving	175	I	17.35%	30.37	
		Haircoloring	150	F	12.64%	18.96	
		Hair Straightening	50	L	22.92%	11.46	
		Facial and Makeup	175	BCN	30.96%	54.17	
		Manicuring and Pedicuring	150	DU	19.50%	29.26	
		Total	1800			371.12	20.62%
	ID	No Subfield Hourly Requirements	1600				
	IL	Basic Training	150	D2	52.28%	78.42	
		Practical Hair/Chemicals	500	D3	28.98%	144.88	
		Hairstyling/Hairdressing	475	D4	7.18%	34.08	
		Management/Sanitation	200	E1	64.88%	129.77	
		Esthetics	85	B1	53.60%	45.56	
		Nail Technology	55	DUB2	14.19%	7.81	
		Electives	35	O	0.00%	0.00	
		Total	1500			440.51	29.37%
	IN	Haircutting	275	G	3.03%	8.33	
		Sanitation	40	Z	100.00%	40.00	
		Statutes and Rules	10	W	100.00%	10.00	
		Salesmanship	10	C2P	6.25%	0.63	
		Management	10	P	25.00%	2.50	
		Manicuring	30	D	18.45%	5.54	
		Pedicuring	20	U	20.56%	4.11	
		Hair Removal	15	E2	46.53%	6.98	

		Anatomy/Physiology	5	R	100.00%	5.00	
		Skin	5	A	53.60%	2.68	
		Hair	5	M	9.17%	0.46	
		Electricity	5	S	100.00%	5.00	
		Chemistry	10	T	100.00%	10.00	
		Shampooing	35	E	11.77%	4.12	
		Scalp	20	M	9.17%	1.83	
		Facials	65	A	53.60%	34.84	
		Hair Coloring	190	F	12.64%	24.02	
		Texture Services	320	E3	4.38%	14.00	
		Hair Styling	280	H	11.32%	31.70	
		Discretionary	150	O	0.00%	0.00	
		Total	1500			211.73	14.12%
	IA	Cosmetology Theory (Multiple Subfields)	615	Y	15.22%	93.61	
		IA Applied Practical Instruction	1335	E4	15.72%	209.81	
		Core Life Sciences	150	R	100.00%	150.00	
		Total	2100			453.42	21.59%
	KS	Sanitation Science	40	Z	100.00%	40.00	
		Hair and Scalp Science	35	M	9.17%	3.21	
		Skin Science	20	A	53.60%	10.72	
		Nail Science	20	D	18.45%	3.69	
		Shampoo Service	35	E	11.77%	4.12	
		Scalp and Hair Service	35	M	9.17%	3.21	
		Facial/Makeup Service	150	F1	16.93%	25.40	
		Manicuring	180	D	18.45%	33.22	
		Hair Coloring	175	F	12.64%	22.12	
		Chemical Waving	150	I	17.35%	26.03	
		Chemical Relaxing	125	L	22.92%	28.65	
		Hair Shaping	150	G	3.03%	4.55	
		Hair Styling	125	H	11.32%	14.15	
		Thermal Techniques	75	K	32.35%	24.26	
		Wiggery	10	A2	7.14%	0.71	
		KS Business Practices	75	P	25.00%	18.75	
		State Law	50	W	100.00%	50.00	
		Unassigned	50	O	0.00%	0.00	
		Total	1500			312.79	20.85%
	KY	KY Science and Theory	375	G1	47.40%	177.74	

		KY Clinical Practice	1085	G2	20.82%	225.91	
		KY Law/Regulations	40	W	100.00%	40.00	
		Total	1500			443.65	29.58%
	LA	No Subfield Hourly Requirements	1500				
	ME	Sterilization/Infection Control	35	Z	100.00%	35.00	
		Management/Unassigned	80	MO	7.70%	6.16	
		Chemical Texture Services	225	IL	20.13%	45.30	
		Use of Equipment	25	H3	25.00%	6.25	
		Sciences	85	X	100.00%	85.00	
		Coloring	285	F	12.64%	36.03	
		Haircutting	300	G	3.03%	9.09	
		Hairstyling	225	H	11.32%	25.47	
		Nail Technology	80	DUB2	14.19%	11.35	
		Shampooing and Scalp Care	40	H1	10.47%	4.19	
		Skin/Facials/Hair Removal/Make up	100	H2	28.63%	28.63	
		Wiggery	20	A2	7.14%	1.43	
		Total	1500			293.91	19.59%
	MD	Orientation	4	O	0.00%	0.00	
		Professional Image	3	A1	1.00%	0.03	
		Bacteriology/Aids Awareness	8.5	Z	100.00%	8.50	
		Sterilization/Sanitation	60.5	Z	100.00%	60.50	
		Hair and Scalp Draping	38.5	M	9.17%	3.53	
			28.5	A3	7.41%	2.11	
		Shampooing, Rinsing, and Conditioning	57	E	11.77%	6.71	
		Hair Shaping	154.5	G	3.03%	4.68	
		Finger Waving	84.5	H	11.32%	9.57	
		Wet Hair Styling	109.5	H	11.32%	12.40	
		Thermal Hairstyling	130.5	K	32.35%	42.22	
		Thermal Straightening	79.5	K	32.35%	25.72	
		Permanent Wave	184.5	I	17.35%	32.01	
		Hair Color	159	F	12.64%	20.10	

		Permanent/Relaxing	124.5	IL	20.13%	25.07	
		Artificial Hair	23.5	A2	7.14%	1.68	
		Manicuring/Pedicuring	54.5	DU	19.50%	10.63	
		Nail Disorders	8.5	V	18.24%	1.55	
		Massage	20	Q	12.12%	2.42	
		Facials	24.5	B	26.67%	6.53	
		Makeup	34.5	C	7.20%	2.48	
		Skin and Skin Disorders	8.5	A	53.60%	4.56	
		Hair Removal	19	N	59.00%	11.21	
		Anatomy and Physiology	35.5	R	100.00%	35.50	
		Electricity and Light Therapy	16	S	100.00%	16.00	
		Chemistry	16.5	T	100.00%	16.50	
		Business	8.5	P	25.00%	2.13	
		First Aid	2	Z	100.00%	2.00	
		Interview/Employment/Taxes	2	P	25.00%	0.50	
		Total	1500			366.84	24.46%
	MA	Manicuring	50	D	18.45%	9.23	
		Waving/Straightening Hair	250	IL	20.13%	50.34	
		Shampoo	25	E	11.77%	2.94	
		Finger Waving	50	H	11.32%	5.66	
		Marcelling/Iron Curls	45	K	32.35%	14.56	
		Skin/Facial Grooming	80	ABC	29.15%	23.32	
		Wiggery/Scalp Treatments	50	A2M	8.16%	4.08	
		Dyes/Bleaching	150	F	12.64%	18.96	
		Haircut	125	G	3.03%	3.79	
		Sterilization/Hygiene/Anatomy	125	z	100.00%	125.00	
		Sanitation	25	Z	100.00%	25.00	
		Ethics/Salesmanship/Courtesy	25	ESC	10.42%	2.60	
		Total	1000			285.48	28.55%
	MI	Sanitation, Etc.	130	Z	100.00%	130.00	
		Facials, Skin, Massage, Hair Removal	115	BQAN	37.85%	43.52	
		Hairdressing, Haircutting, with Wiggery	525	J1	7.17%	37.64	
		Scalp/Hair	25	M	9.17%	2.29	
		Hair Coloring	210	F	12.64%	26.55	
		Waving/Straightening	220	IL	20.13%	44.30	

		Safety & Health Administration	30	Z	100.00%	30.00	
		Anatomy and Physiology	45	R	100.00%	45.00	
		Manicure/Pedicure	70	DU	19.50%	13.65	
		Artificial Nails	20	B2	3.57%	0.71	
		Unassigned	110	O	0.00%	0.00	
		Total	1500			373.66	24.91%
	MN	Shampoo	50	E	11.77%	5.89	
		Hair/Scalp	80	M	9.17%	7.34	
		Hair Shaping	150	G	3.03%	4.55	
		Chemical Hair Control	200	L	22.92%	45.83	
		Hair Coloring	100	F	12.64%	12.64	
		Hair Styling	200	H	11.32%	22.64	
		Facials/Makeup	200	ABC	29.15%	58.31	
		Manicures (Incl. Artificial Nails)	150	DUB2	14.19%	21.29	
		MN Theory/Lecture	420	Minn.t	13.69%	57.48	
		Total	1550			235.96	15.22%
	MS	No Subfield Hourly Requirements	1500				
	MO	Shampoo	40	E	11.77%	4.71	
		Hair Coloring	130	F	12.64%	16.43	
		Haircutting	130	G	3.03%	3.94	
		Waving/Relaxing	125	IL	20.13%	25.17	
		Styling/Thermal Hairstyling	225	K	32.35%	72.79	
		Hairstyling	105	H	11.32%	11.89	
		Hair/Scalp	30	M	9.17%	2.75	
		Facials	40	B	26.67%	10.67	
		Manicure/Massage/Nails	110	DVQ	16.27%	17.90	
		Chemistry	25	T	100.00%	25.00	
		Salesmanship/Management	10	C2P	6.25%	0.63	
		Sanitation/Sterilization	30	Z	100.00%	30.00	
		Anatomy	20	R	100.00%	20.00	
		Law	10	W	100.00%	10.00	
		Curriculum to Be Determined by School	470	O	0.00%	0.00	
		Total	1500			251.87	16.79%
	MT	Manicuring	95	D	18.45%	17.53	

		Esthetics	110	B1	53.60%	58.96	
		Shampoo/Scalp /Hairstyling/Br aiding/Therma l Curling	195	EMH K	13.80%	26.91	
		Chemical Services/Hair Coloring	395	FIL	17.64%	69.67	
		Haircutting	155	G	3.03%	4.70	
		Management/S anitation/Busi ness Methods/Laws & Rules	115	F2	62.50%	71.88	
		Sterilization/S ciences/Diseas es	60	XXZ	100.00%	60.00	
		Discretionary	375	O	0.00%	0.00	
		Total	1500			309.63	20.64%
	NE	Chemical Services	40	L	22.92%	9.17	
		Haircutting	40	G	3.03%	1.21	
		Hairstyling	20	H	11.32%	2.26	
		Hair Coloring	40	F	12.64%	5.06	
		Shampoos/Con ditioners/Scalp	40	H1	10.47%	4.19	
		General Sciences	40	X	100.00%	40.00	
		Facials and Body Services	32	FM.Z	18.47%	5.91	
		Hair Removal	30	E2	46.53%	13.96	
		Law and Regulations	40	W	100.00%	40.00	
		Infection Control Practices for Subfields	29.67	Z	100.00%	29.67	
		Hairstyling (with Wiggery)	20	H.A2	14.04%	2.81	
		Nail Services (Anatomy)	11.67	R	100.00%	11.67	
		Nail Diseases and Disorders	11.67	ASNZ Z.Y	56.00%	6.53	
		Nail Enhancements	5	AdvN. Y	12.43%	0.62	
		Chemical Services	200	L	22.92%	45.83	
		Haircutting	300	G	3.03%	9.09	
		Hairstyling	200	H.A2	14.04%	28.08	
		Hair Coloring	300	F	12.64%	37.92	
		Shampoos/Con ditioners/Scalp	5	H1	10.47%	0.52	
		Facials and Body Services	60	X	100.00%	60.00	
		Hair Removal	30	E2	46.53%	13.96	
		Nail Services	50	V	18.24%	9.12	
		Infection Control	20	Z	100.00%	20.00	

		Optional	100	O	0.00%	0.00	
		Flexible	135	O	0.00%	0.00	
		Total	1800			397.59	22.09%
	NV	No Subfield Hourly Requirements	1600				
	NH	No Subfield Hourly Requirements	1500				
	NJ	Law/Rules/Reg ulations	10	W	100.00%	10.00	
		Decontaminati on/Infection	20	Z	100.00%	20.00	
		Image/Hygiene	2	IH	50.00%	1.00	
		History of Barbering	4	A1	1.00%	0.04	
		Shaving	81	SS	26.38%	21.37	
		Beards/Mustac hes	15	SS	26.38%	3.96	
		Facials/Massa ge/Skin/Makeu p/Hair Removal	78	BQAN C	31.72%	24.74	
		Shampoo	60	E	11.77%	7.06	
		Hair/Scalp	50	M	9.17%	4.59	
		Haircutting	160	G	3.03%	4.85	
		Hairstyling	160	H	11.32%	18.11	
		Hair Coloring	145	F	12.64%	18.33	
		Permanent Wave	115	I	17.35%	19.96	
		Chemical Treatments	90	L	22.92%	20.63	
		Thermal Hairstyling	45	K	32.35%	14.56	
		Manicure/Pedi cure	135	DU	19.50%	26.33	
		Chemistry	30	T	100.00%	30.00	
		Total	1200			245.51	20.46%
	NM	Theory	75	NM.T	60.71%	45.54	
		Sterilization/S anitation	75	Z	100.00%	75.00	
		Shampoo/Scalp Treatments	75	EM	10.47%	7.85	
		Permanents/C hemical Treatments	200	IL	20.13%	40.27	
		Hairstyling	150	H	11.32%	16.98	
		Haircoloring	125	F	12.64%	15.80	
		Haircutting	200	G	3.03%	6.06	
		Facials	175	B	26.67%	46.67	
		Manicuring/Pe dicuring	175	DU	19.50%	34.13	
		Business/Retai l	50	P	25.00%	12.50	

		Miscellaneous/ Unassigned	300	O	0.00%	0.00	
		Total	1600			300.80	18.80%
	NY	Law/Managem ent/Departmen t/Ethics	24	LMDE	37.75%	9.06	
		Safety and Health	26	Z	100.00%	26.00	
		Anatomy/Physi ology	15	R	100.00%	15.00	
		Hair Analysis	10	M	9.17%	0.92	
		Hair and Scalp Disorders	10	M	9.17%	0.92	
		Chemistry	5	T	100.00%	5.00	
		Shampoos	30	E	11.77%	3.53	
		Haircutting	175	G	3.03%	5.30	
		Hairstyling	245	H	11.32%	27.74	
		Chemical Treatments	180	L	22.92%	41.25	
		Hair Coloring	180	F	12.64%	22.75	
		Nail Care	40	DU	19.50%	7.80	
		Skin Care	60	A	53.60%	32.16	
		Total	1000			197.43	19.74%
	NC	No Subfield Hourly Requirements	1500				
	ND	Hair Shaping	250	G	3.03%	7.58	
		Hairstyling	250	H	11.32%	28.30	
		Nails	100	V	18.24%	18.24	
		Facials/Skin Care	100	AC	30.40%	30.40	
		Chemical Services	250	L	22.92%	57.29	
		Theory/Law/Cl eaning & Disinfecting	400	ND.T	71.67%	286.67	
		ND Related Subjects	450	ND.A	32.64%	146.87	
		Total	1800			575.34	31.96%
	OH	Infection Control	60	Z	100.00%	60.00	
		Hair and Scalp	120	OH.H	32.09%	38.50	
		Hairstyling/Th ermal Styling/Haircu tting/Wiggery	460	OH.H 2	13.46%	61.92	
		Hair Waving/Relaxi ng/Coloring	480	FIL	17.64%	84.66	
		Manicure/Pedi cure/Nail Enhancements /Massage	120	DQUB 2	13.68%	16.41	
		Skin/Facials/El ectricity	120	ABS	60.09%	72.11	

		Management/ Communicatio n	120	MO	7.70%	9.24	
		Laws and Rules	20	W	100.00%	20.00	
		Total	1500			362.84	24.19%
	OK	Theory	150	OK.T	19.82%	29.73	
		Manicure/Pedi cure/Nails/Arti ficial Nails	90	DUVB 2	15.20%	13.68	
		Facials/Makeu p/Hair Removal	160	BCN	30.96%	49.53	
		Shampooing	30	H1	10.47%	3.14	
		Hairstyling/Wi ggery/Thermal	300	HKA2	16.94%	50.82	
		Color	170	F	12.64%	21.49	
		Haircutting	180	G	3.03%	5.45	
		Management/ Development/ Unassigned	180	POA1	8.67%	15.60	
		Waving and Relaxing	240	IL	20.13%	48.32	
		Total	1500			237.77	15.85%
	OR	Anatomy & Physiology	22	R	100.00%	22.00	
		Microbiology	4	Z	100.00%	4.00	
		Haircutting	320	G	3.03%	9.70	
		Hairstyling	157.5	HKE3	16.02%	25.23	
		Chemical Services	540	L	22.92%	123.75	
		Shaving	5	SS	26.38%	1.32	
		Equipment	17.5	H3	25.00%	4.38	
		Product Knowledge	31	P.Z	25.00%	7.75	
		Safety/Law	13	Z	100.00%	13.00	
		Career Development	20	CD	1.00%	0.20	
		Law/Rules/Reg s	20	W	100.00%	20.00	
		Total	1150			231.32	20.11%
	PA	Sanitation/La w/Business Practices/Attit ude	50	ZWPA 1	56.50%	28.25	
		Sciences	200	X	100.00%	200.00	
		PA Skills (Multiple Specified Subfields)	1000	PA.S	20.57%	205.67	
		Total	1250			433.92	34.71%
	RI	No Subfield Hourly Requirements	1200				

	SC	Sanitation/Disinfection	45	Z	100.00%	45.00	
		Personal Hygiene	30	z	100.00%	30.00	
		Professionalism/Ethics	35	D1	25.00%	8.75	
		Public Relations/Salesmanship	50	A1	1.00%	0.50	
		Anatomy	45	R	100.00%	45.00	
		Dermatology	25	A	53.60%	13.40	
		Trichology	25	M	9.17%	2.29	
		Nail Structure	15	V	18.24%	2.74	
		Chemistry	100	T	100.00%	100.00	
		Safety	30	Z	100.00%	30.00	
		Shampoos	45	E	11.77%	5.30	
		Scalp and Hair Care	30	M	9.17%	2.75	
		Hair Shaping	150	G	3.03%	4.55	
		Hair Styling	325	H	11.32%	36.79	
		Nail Technology	25	V	18.24%	4.56	
		Waving/Relaxing	225	IL	20.13%	45.30	
		Coloring	225	F	12.64%	28.44	
		Facial/Skin/Makeup/Hair Removal	40	ABCN	36.62%	14.65	
		State Law	15	W	100.00%	15.00	
		Unassigned	20	O	0.00%	0.00	
		Total	1500			435.01	29.00%
	SD	Infection Control/Professional Standards	150	ICPS	62.50%	93.75	
		Scientific Concepts	200	NE.S	69.30%	138.61	
		General Cosmetology	300	NE.C	7.12%	21.36	
		Chemical Hair Services	280	CC	17.78%	49.78	
		Esthetics and Skin Sciences	200	B1	53.60%	107.19	
		Nail Technology	120	NE.N	26.18%	31.42	
		Optional	250	O	0.00%	0.00	
		Total	1500			442.11	29.47%
	TN	General (Incl. Sterilization, Anatomy, Ethics, Law, etc.)	300	TN.G	65.20%	195.60	
		Chemical (Incl. Waves, Relaxers, Color, Nails, etc.)	600	TN.C	30.05%	180.32	

		Physical (Incl. Shampoo, Scalp Care, etc.)	600	TN.P	14.42%	86.55	
		Total	1500			462.46	30.83%
	TX	TX Hair Care (Incl. Cutting, Styling, Safety, Law, etc.)	800	TX.H	41.77%	334.16	
		TX Nail Care (Incl. Manicure, Safety, Law, etc.)	100	TX.N	57.41%	57.41	
		TX Skin Care (Incl. Facials, Hair Removal, Safety, Law, etc.)	100	TX.S	57.03%	57.03	
		Total	1000			448.60	44.86%
	UT	No Subfield Hourly Requirements	1600				
	VT	No Subfield Hourly Requirements	1000				
	VA	No Subfield Hourly Requirements	1500				
	WA	No Subfield Hourly Requirements	1600				
	WV	Professional Information	100	WV.I	58.33%	58.33	
		Science	250	WV.S	77.13%	192.82	
		Professional Skills	450	WV.P	7.80%	35.11	
		Chemicals	200	WV.C	17.78%	35.56	
		Aesthetic Sciences	167	WV.A	100.00%	167.00	
		Skin Sciences	130	A	53.60%	69.68	
		General Esthetics	203	WV.G	26.25%	53.28	
		Nail Technology	74	WV.N	74.37%	55.03	
		Basic Procedures	92	WV.B	13.68%	12.58	
		Nail Art	134	WV.T	15.20%	20.37	
		Total	1800			699.76	38.88%
	WI	Hygiene	10	Z	100.00%	10.00	
		Sterilization	40	Z	100.00%	40.00	

		Haircutting, Hairstyling, Thermal Waving, etc.	580	WI1	9.96%	57.80	
		Relaxing, Thermal Straightening, etc.	577	WI2	37.05%	213.79	
		Haircutting, Hair Removal, Makeup, Facial, Electricity, etc.	95	WI3	34.67%	32.94	
		Manicure/Enhancement	35	DV	18.34%	6.42	
		Scalp/Nails/Skin	50	WI4	27.00%	13.50	
		Product Use	30	H3	25.00%	7.50	
		Law/Ethics/History	18	Wetc	42.00%	7.56	
		Unassigned	115	O	0.00%	0.00	
		Total	1550			389.51	25.13%
	WY	Infection Control and Professional Standards	100	WY.I	62.50%	62.50	
		Science	290	X	100.00%	290.00	
		General Cosmetology	500	WY.C	68.71%	343.57	
		Chemical Services/Hair Coloring	250	FIL	17.64%	44.09	
		Skin Sciences	70	A	53.60%	37.52	
		Esthetics	180	wy.e	26.25%	47.24	
		Nail Technology	90	wy.n	16.10%	14.49	
		Nail Art	120	wy.n	16.10%	19.32	
		Total	1600			858.73	53.67%
Manicurist	AL	Bacteria/Infections	90	Z	100.00%	90.00	
		Safety	50	Z	100.00%	50.00	
		Sanitation	90	Z	100.00%	90.00	
		Nail/Nail Disorders	80	DIS.Y	80.79%	64.63	
		Skin/Skin Disorders	40	A	53.60%	21.44	
		Client Consultation	40	SM.Z	13.00%	5.20	
		Manicure	50	D.Y	22.59%	11.29	
		Pedicure	50	U.Y	31.66%	15.83	
		Nail Tips	55	Nt.Y	14.01%	7.71	
		Nail Wraps	55	Nw.Y	1.55%	0.85	
		Acrylic Nails	55	Acryl.Y	8.72%	4.80	
		Nail Art	55	Nart.Y	1.00%	0.55	

		Salon Management	15	P	25.00%	3.75	
		Marketing & Services	15	S.Z	1.00%	0.15	
		Unassigned	10	O	0.00%	0.00	
		Total	750			366.20	48.83%
	AK	Bacteria	1	Z	100.00%	1.00	
		Infectious Agents	2	Z	100.00%	2.00	
		Sanitation	3	Z	100.00%	3.00	
		Harmful Products and Protection	2	Z	100.00%	2.00	
		Anatomy and Physiology	2	R	100.00%	2.00	
		Nail Disorders	2	Dis.Y	80.79%	1.62	
		Total	12			11.62	96.80%
	AZ	No Subfield Hourly Requirements	600				
	AR	Health/Sanitation	75	Z	100.00%	75.00	
		Health-Related Science	75	X	100.00%	75.00	
		Manicure/Pedicure	200	MP.Y	27.12%	54.25	
		Advanced Nail Technology	200	AdvN.Y	12.43%	24.86	
		Career Development	50	A1	1.00%	0.50	
		Total	600			229.61	38.27%
	CA	Health Safety	100	Z	100.00%	100.00	
		CA Nail Care	300	CA.N.Z	26.87%	80.60	
		Total	400			180.60	45.15%
	CO	Manicuring/Pedicuring	210	MP.Y	27.12%	56.96	
		Application of Artificial Nails	150	Nartf.Y	8.72%	13.08	
		Law/Rules/Regulations	30	W	100.00%	30.00	
		Management/Ethics/Interpersonal Skills/Salesmanship	30	MEIS	14.06%	4.22	
		Disinfection/Cleaning/Safety	180	Z	100.00%	180.00	
		Total	600			284.26	47.38%
	CT	No Subfield Hourly Requirements	100				

	DE	No Subfield Hourly Requirements	300				
	DC	Manicuring/Pedicuring (Water And Oil)	100	MP.Y	27.12%	27.12	
		Pedicure	25	U.Y	25.00%	6.25	
		Personal Hygiene	25	Z	100.00%	25.00	
		Ethics/Salesmanship	25	DS.Y	13.00%	3.25	
		Courtesy/Conduct/Law/Communication Skills	35	P	25.00%	8.75	
		Anatomy/Physiology	25	R	100.00%	25.00	
		Bacteriology/Pathology	30	Z	100.00%	30.00	
		Chemistry	35	T	100.00%	35.00	
		Electricity	20	S	100.00%	20.00	
		Sanitation	30	Z	100.00%	30.00	
		Total	350			210.37	60.11%
	FL	Laws/Rules	4	W	100.00%	4.00	
		Sanitation	8	Z	100.00%	8.00	
		Ethics	2	D1	25.00%	0.50	
		Nail Theory/Practice/Disorders	76	V.Y	43.78%	33.27	
		Manicures	15	D.Y	22.59%	3.39	
		Pedicures	10	U.Y	31.66%	3.17	
		Tips with Overlay	15	Nt.Y	14.01%	2.10	
		Sculpting	10	Ns.Y	8.72%	0.87	
		Nail Wraps/Mending	10	Nw.Y	1.55%	0.16	
		Nail Fill-Ins	10	Nf.Y	8.72%	0.87	
		Artificial Nail Removal	5	Nartf.Y	8.72%	0.44	
		Polishing/Nail Art	10	Np.Y	1.00%	0.10	
		Gel Nails	5	Ng.Y	3.76%	0.19	
		Total	180			57.05	31.70%
	GA	GA Theory (Sanitation, Science, etc.)	140	GA.T.Y	62.46%	87.44	
		Sanitizing/Disinfection of Tools	5	Z	100.00%	5.00	
		Manicure and Massage	70	Dm.Y	22.59%	15.81	
		Pedicure and Massage	60	Pm.Y	31.66%	19.00	

		Nail Sculpting	60	Ns.Y	8.72%	5.23	
		Artificial Tip/Overlay	60	Nt.Y	14.01%	8.41	
		Nail Wrapping	20	Nw.Y	1.55%	0.31	
		UV Gel Nails	20	Ng.Y	3.76%	0.75	
		Fill-In Application	40	Nf.Y	8.72%	3.49	
		Artificial Nail Removal/Nail Repair	10	Nartf.Y	8.72%	0.87	
		Nail Drill Usage	5	Ndr.Y	23.56%	1.18	
		Nail Art	5	Nart.Y	1.00%	0.05	
		Airbrush Nail Art	5	Nartb.Y	1.00%	0.05	
		Paraffin Treatments -- Hands and Feet	5	Prf.Y	22.73%	1.14	
		Advanced Techniques	20	AdvN.Y	12.43%	2.49	
		Total	525			151.21	28.80%
	HI	Anatomy/Chemistry/Product Knowledge/Sanitation	100	RTPZ.Y	81.25%	81.25	
		Management	50	E1	64.88%	32.44	
		Unassigned	50	O	0.00%	0.00	
		Manicuring/Pedicuring	150	MP.Y	27.12%	40.69	
		Total	350			154.38	44.11%
	ID	No Subfield Hourly Requirements	400				
	IL	History, Hygiene, Ethics, etc.	50	IL.B.Y	78.53%	39.27	
		Science/Massage/People Skills	15	QXP.Y	37.31%	5.60	
		Practices and Procedures	255	IL.9.Y	17.60%	44.89	
		Business Practices	30	E1.Y	81.25%	24.38	
		Total	350			114.12	32.61%
	IN	Sanitation	40	Z	100.00%	40.00	
		Anatomy & Disorders	25	ASNZ.Z.Y	56.00%	14.00	
		Statutes/Rules	10	W	100.00%	10.00	
		Nail Techniques: Tips, Sculptures, Overlays, etc.	190	AdvN.Y	12.43%	23.62	

		Manicure	60	D.Y	22.59%	13.55	
		Pedicure	35	U.Y	31.66%	11.08	
		Chemistry	10	T	100.00%	10.00	
		Salesmanship	15	S.Z	1.00%	0.15	
		Electric Drill/File	20	Ndr.Y	23.56%	4.71	
		Discretionary	45	O	0.00%	0.00	
		Total	450			127.12	28.25%
	IA	Core Life Sciences	150	IA.CL S.Y	86.62%	129.92	
		Nail Technology	50	IA.NT .Y	15.20%	7.60	
		Applied Practical Instruction	125	IA.AP. Y	15.20%	19.00	
		Total	325			156.53	48.16%
	KS	KS Scientific Concepts	60	KS.X. Y	86.88%	52.13	
		Manicuring Skills	75	KS.M. Y	39.32%	29.49	
		Artificial Nails	160	Nartf. Y	8.72%	13.95	
		Business Practices	35	P.Y	25.00%	8.75	
		State Law	20	W	100.00%	20.00	
		Total	350			124.32	35.52%
	KY	Science/Theory	150	KY.X. Y	80.14%	120.21	
		Laws/Regulations	25	W	100.00%	25.00	
		Clinic/Practice Hours	275	KY.N. Y	14.85%	40.85	
		Total	450			186.06	41.35%
	LA	No Subfield Hourly Requirements	500				
	ME	Bacteriology, Hygiene, Disinfection, etc.	30	Z	100.00%	30.00	
		General Sciences, Incl. Nail Structure, etc.	20	X	100.00%	20.00	
		Equipment, Tools, Safety, etc.	10	EZ.Y	62.50%	6.25	
		Nail Technology, Incl. Artificial Nails	65	Acryl. Y	8.72%	5.67	
		Pedicuring	55	U.Y	31.66%	17.41	
		Management/Laws/Electives	20	MLO. Y	31.25%	6.25	

		Total	200			85.58	42.79%
	MD	Orientation	4	O	0.00%	0.00	
		Anatomy & Physiology	36	R	100.00%	36.00	
		Sanitation/Sterilization	17	Z	100.00%	17.00	
		Equipment	10	P.Y	25.00%	2.50	
		Manicure/Pedicure/Massage	30	DPM.Y	27.12%	8.14	
		Artificial Nails	100	AdvN.Y	12.43%	12.43	
		New Products and Techniques	20	AdvN.Y	12.43%	2.49	
		Regulations/Ethics	5	ER.Y	62.50%	3.13	
		Business Practices	8	S.Z	1.00%	0.08	
		Hygiene	3	Z	100.00%	3.00	
		Safety	12	Z	100.00%	12.00	
		Laws and Regulations	5	W	100.00%	5.00	
		Total	250			101.76	40.70%
	MA	Safety and Sanitation	10	Z	100.00%	10.00	
		Artificial Nails	25	AdvN.Y	12.43%	3.11	
		First Aid	2.5	Z	100.00%	2.50	
		Manicuring and Massage	40	Dm.Y	22.59%	9.04	
		Ethics/Mgmt/Law	12.5	LME.Y	50.00%	6.25	
		Hygiene and Anatomy	10	HA.Y	100.00%	10.00	
		Total	100			40.89	40.89%
	MI	Sanitation	50	Z	100.00%	50.00	
		Anatomy/Disorders	25	AD.Y	90.39%	22.60	
		Art Principles	10	O	0.00%	0.00	
		Manicuring/Pedicuring	20	MP.Y	27.12%	5.42	
		Chemistry/Safety	15	TZ.Y	100.00%	15.00	
		Artificial Nails	25	Nartf.Y	8.72%	2.18	
		Sanitation	50	Z	100.00%	50.00	
		Manicuring/Pedicuring	50	MP.Y	27.12%	13.56	
		Artificial Nails	105	Nartf.Y	8.72%	9.16	
		Unassigned	50	O	0.00%	0.00	
		Total	400			167.92	41.98%
	MN	MN Preclinical Instruction	62.5	MN.I.Y	79.23%	49.52	

		Nails/Artificial Nails	62.5	NA.Y	19.78%	12.36	
		Applied Sciences and Skills Related to Nails	162.5	NA.Y	19.78%	32.14	
		Business Practices/Laws	62.5	BL.Y	62.50%	39.06	
		Total	350			133.08	38.02%
	MS	Theory	85	MI.T.Y	30.21%	25.68	
		Skill/Practice	250	NA.Y	19.78%	49.44	
		Unassigned	15	O	0.00%	0.00	
		Total	350			75.12	21.46%
	MO	Massage/Nails/Manicuring	220	DVQ	16.27%	35.79	
		Salesmanship/Management	20	SM.Z	13.00%	2.60	
		Sanitation/Sterilization	20	Z	100.00%	20.00	
		Anatomy	10	R	100.00%	10.00	
		Law	10	W	100.00%	10.00	
		Use of Chemicals	40	T	100.00%	40.00	
		Miscellaneous	80	O	0.00%	0.00	
		Total	400			118.39	29.60%
	MT	Management, Sanitation, etc.	60	MT.M.Y	39.57%	23.74	
		Sanitation/Sciences/Diseases/Disorders	55	MT.S.Y	95.60%	52.58	
		Manicures/Pedicures/Polish/Implements	35	MPPI.Y	20.06%	7.02	
		Electric Nail File Use	10	Ndr.Y	23.56%	2.36	
		Liquid and Powder Enhancements, etc.	140	AdvN.Y	12.43%	17.40	
		Discretionary	100	O	0.00%	0.00	
		Total	400			103.10	25.78%
	NE	NE Theory	75	NE.T.Y	59.40%	44.55	
		Nail Wraps	9	Nw.Y	1.55%	0.14	
		Nail Acrylic	54	Acryl.Y	8.72%	4.71	
		Gels	36	Ng.Y	3.76%	1.35	
		Manual/Electric Filing	27	Ndr.Y	23.56%	6.36	
		Nail Wrap Repair/Removal	9	Nw.Y	1.55%	0.14	

		Acrylic Repair/Removal	36	Acryl. Y	8.72%	3.14	
		Gel Repair/Removal	27	Ng.Y	3.76%	1.01	
		Manicure	9	D.Y	22.59%	2.03	
		Pedicure	18	U.Y	31.66%	5.70	
		Total	300			69.14	23.05%
	NV	No Subfield Hourly Requirements	600				
	NH	No Subfield Hourly Requirements	300				
	NJ	Law/Administration	10	LM.Y	62.50%	6.25	
		Image/Hygiene	2	IH	50.00%	1.00	
		Decontamination/Infection Control	20	Z	100.00%	20.00	
		Manicuring/Pedicuring	55	MP.Y	27.12%	14.92	
		Diseases/Disorders of the Nail	10	ASNZ Z.Y	56.00%	5.60	
		Anatomy	10	R	100.00%	10.00	
		Nail Tips/Extensions	30	Nt.Y	14.01%	4.20	
		Nail Wraps	30	Nw.Y	1.55%	0.47	
		Nail Gels	20	Ng.Y	3.76%	0.75	
		Sculptured Nails	40	Ns.Y	8.72%	3.49	
		Nail Art	10	Nart. Y	1.00%	0.10	
		Skin and Its Diseases	5	A	53.60%	2.68	
		Hair Removal	40	N	59.00%	23.60	
		First Aid	5	Z	100.00%	5.00	
		Chemicals/Product Chemistry	13	T	100.00%	13.00	
		Total	300			111.06	37.02%
	NM	NM Theory	75	NM.T. Y	53.50%	40.13	
		Sterilization/Sanitation/Bacteriology	75	Z	100.00%	75.00	
		Manicuring/Pedicuring	175	NM.M P.Y	35.41%	61.97	
		Business/Retail Sales	50	S.Z	1.00%	0.50	
		Miscellaneous	25	O	0.00%	0.00	
		Total	400			177.59	44.40%

	NY	Orientation	4	A1	1.00%	0.04	
		Safety and Health	8	Z	100.00%	8.00	
		Bacteria/Diseases/Disorders	10	ASNZ Z.Y	56.00%	5.60	
		Infection Control	10	Z	100.00%	10.00	
		Client Consultation	10	A1	1.00%	0.10	
		Manicuring/Massage	4	Dm.Y	22.59%	0.90	
		Pedicuring	20	U.Y	31.66%	6.33	
		Tip Application/Design	15	Nt.Y	14.01%	2.10	
		Business/Retail	12	P.Y	25.00%	3.00	
		Nail Wraps	25	Nw.Y	1.55%	0.39	
		Liquid and Powder Nail Extensions	50	Nartf.y	8.72%	4.36	
		Gel Nails	20	Ng.Y	3.76%	0.75	
		Nail Art	4	Nart.Y	1.00%	0.04	
		Retailing Techniques	6	A1	1.00%	0.06	
		Business Practices	8	P.Y	25.00%	2.00	
		Job Skills	6	A1	1.00%	0.06	
		Miscellaneous/Unassigned	38	O	0.00%	0.00	
		Total	250			43.74	17.50%
	NC	No Subfield Hourly Requirements	300				
	ND	Cleaning/Disinfecting	45	Z	100.00%	45.00	
		Manicuring/Pedicuring/Artificial Nails	200	NA.Y	19.78%	39.56	
		Law/Disinfecting	45	ZL.Y	100.00%	45.00	
		Related Subjects	35	ND.R.Y	73.26%	25.64	
		Unassigned	25	O	0.00%	0.00	
		Total	350			155.20	44.34%
	OH	Infection Control/Practices	30	Z	100.00%	30.00	
		Anatomy	10	R	100.00%	10.00	
		Massage	10	B6.Y	17.33%	1.73	
		Nail Care Procedures and Practices	55	V.Y	43.78%	24.08	

		Chemistry of Nail Materials	10	T	100.00%	10.00	
		Nail Enhancements	35	AdvN.Y	12.43%	4.35	
		Specialized Equipment	10	P.Y	25.00%	2.50	
		Salon Operations and Communications Skills	20	SM.Z	13.00%	2.60	
		Cosmetology Laws and Rules	20	W	100.00%	20.00	
		Total	200			105.26	52.63%
	OK	Bacteriology/Disinfection	40	Z	100.00%	40.00	
		Nail Structure/Composition/Disorders/Diseases	60	ASNZ Z.Y	56.00%	33.60	
		Manicuring/Pedicuring	160	MP.Y	27.12%	43.40	
		Artificial Nails	160	Nartf.Y	8.72%	13.95	
		Nail Art	60	Nart.Y	1.00%	0.60	
		Business Development, etc.	80	OK.B.Y	23.44%	18.75	
		Rules/Regulations/Statute	40	W	100.00%	40.00	
		Total	600			190.30	31.72%
	OR	Safety/Law	18	Z	100.00%	18.00	
		Microbiology	2	Z	100.00%	2.00	
		Manicuring	40	D.Y	22.59%	9.04	
		Pedicuring	40	U.Y	31.66%	12.66	
		Artificial Nails	120	Nartf.Y	8.72%	10.47	
		Tools	6	P.Z	25.00%	1.50	
		Product Knowledge	8	P.Z	25.00%	2.00	
		Safety/Law	7	Z	100.00%	7.00	
		Career Development	20	A1	1.00%	0.20	
		Law/Rules	20	W	100.00%	20.00	
		Total	281			82.87	29.49%
	PA	Professional Practice	25	PA.P.Y	42.00%	10.50	
		Sciences	75	X	100.00%	75.00	
		Nail Treatments	75	V.Y	43.78%	32.83	
		Pedicuring	25	U.Y	31.66%	7.92	
		Total	200			126.25	63.12%

	RI	No Hourly Subfield Requirements	300				
	SC	Bacteriology/Sanitation	75	Z	100.00%	75.00	
		Anatomy/Physiology	30	ASNZ Z.Y	56.00%	16.80	
		SC Nail Technology	105	SC.N. Y	18.74%	19.67	
		Artificial Nails	50	Nartf. Y	8.72%	4.36	
		Power Equipment	25	Ndr.Y	23.56%	5.89	
		State Law	15	W	100.00%	15.00	
		Total	300			136.72	45.57%
	SD	Safety and Infection Control Procedures	60	Z	100.00%	60.00	
		Scientific Concepts	60	X	100.00%	60.00	
		Manicure/Pedicure/Massage	90	MP.Y	27.12%	24.41	
		Artificial Nails, Incl. Sculptured Nails/Tips/Wraps/Gel	130	AdvN. Y	12.43%	16.16	
		Management/Salesmanship/Ethics/Communications	60	MSE. Y	12.75%	7.65	
		Total	400			168.22	42.06%
	TN	General (Incl. Sterilization, Anatomy, Law, etc.)	150	TN.G. Y	58.33%	87.50	
		Chemical (Incl. Product Knowledge, etc.)	100	TN.C. Y	50.71%	50.71	
		Physical (Incl. Massage, Manicuring, etc.)	350	TN.P. Y	18.45%	64.59	
		Total	600			202.79	33.80%
	TX	TX Procedures	320	TX.M P.Y	14.23%	45.54	
		Bacteriology/Sanitation/Safety	100	Z	25.00%	25.00	
		TX Professional Practices	80	TX.PP .Y	19.38%	15.50	

		TX Arms and Hands	70	TX.A H.Y	65.19%	45.64	
		Rules/Law	15	W	100.00%	15.00	
		Equipment, Implements, and Supplies	15	H3	25.00%	3.75	
		Total	600			150.43	25.07%
	UT	No Subfield Hourly Requirements	300				
	VT	No Subfield Hourly Requirements	200				
	VA	No Subfield Hourly Requirements	150				
	WA	No Subfield Hourly Requirements	600				
	WV	Professional Information (Law, Sanitation, etc.)	100	WV.P.Y	58.33%	58.33	
		Nail Science (Incl. Infection Control, Disorders, etc.)	74	WV.S.Y	86.30%	63.86	
		Basic Procedures (Incl. Manicures, Massages, etc.)	92	WV.B.Y	41.24%	37.94	
		Nail Technology and Art (Incl. Filing, Tips, Liquid, Gels, etc.)	134	WV.T.Y	12.81%	17.16	
		Total	400			177.29	44.32%
	WI	Law/Management/History/Ethics	36	LMH E.Y	37.75%	13.59	
		Safety/Sanitation	35	Z	100.00%	35.00	
		Nails and Skin Disorders	34	ASNZ Z.Y	56.00%	19.04	
		Anatomy/Physiology	26	R	100.00%	26.00	
		Manicuring and Pedicuring (Incl.	136	NA.Y	19.78%	26.90	

		Enhancements)					
		Advertising	12	A1	1.00%	0.12	
		Electives	21	O	0.00%	0.00	
		Total	300			120.65	40.22%
	WY	Science of Nail Technology	40	WY.S. Y	84.34%	33.74	
		Nail Technology	110	WY.N. Y	32.35%	35.58	
		Art	150	WY.A. Y	12.81%	19.21	
		Total	300			88.53	29.51%

Table 3: Code Key for Table 2

Code	Subfield	H/S Ratio
A	Skin	53.60%
A1	Department/History	1.00%
A2	Wiggery	7.14%
A2M	Wig/Scalp	0.00%
A3	Draping	7.41%
AB	Facials/Skin Care	40.13%
ABC	Skin/Facials/Makeup	29.15%
ABCD	Skin/Facials/Makeup/Manicuring	26.48%
ABCN	Facial/Skin/Makeup/Hair Removal	36.62%
ABS	Skin/Facials/Electricity	60.09%
AC	Skin/Makeup	30.40%
ACQ	Massage/Skin/Makeup	24.31%
Acryl.Y	Acrylic Procedures	8.72%
AD.Y	Anatomy/Disorders	90.39%
AdvN.Y	Advanced Nail Technology	12.43%
AG.Y	Artificial/Gel Nails	6.24%
ASNZZ.Y	Anatomy/Skin/Nails/Diseases/Disorders	56.00%
AZS.Z	AZ Study Requirement	78.26%
AZSP.Z	AZ Study/Practice Requirement	18.80%
B	Facials	26.67%
B1	Esthetics	53.60%
B2	Artificial Nails and Wraps	3.57%
B6.Y	Massage Curriculum	17.33%
BCN	Facials/Makeup/Hair Removal	30.96%
BH.Z	Beard Trimming/Haircutting	19.98%
BL.Y	Business Practices/Laws	62.50%
BQAN	Facials, Skin, Massage, Hair Removal	37.85%
BQANC	Facials/Massage/Skin/Makeup/Hair Removal	31.72%
BS.Z	Beard Trimming/Hairstyling	24.13%
C	Makeup	7.20%
C1	FL Education Requirements	92.38%
C2	Unspecified Theory	100.00%
C2.G	GA Advanced Theory	43.75%
C2.H	HI Theory	76.42%
C2P	Salesmanship (with Management)	6.25%
CA.N.Z	CA Curriculum	26.87%
CC	Coloring and Chemical Services	17.78%
CD	Career Development	1.00%
CS.Z	Client Services	47.36%

D	Manicure	18.45%
D.Y	Specialist Manicure	22.59%
D1	Ethics	25.00%
D2	IL Basic Training	52.28%
D3	IL Chemicals/Hair Treatment	28.98%
D4	Hairstyling/Haircutting/Hairdressing	7.18%
DIS.Y	Nail Diseases and Disorders	80.79%
Dm.Y	Manicure/Massage	22.59%
DPM.Y	Manicure/Pedicure/Massage	27.12%
DQUB2	Manicure/Pedicure/Artificial Nails/Massage	13.68%
DS.Y	Ethics/Salesmanship	13.00%
DU	Manicuring and Pedicuring	19.50%
DUB2	Manicure/Pedicure/Artificial Nails	14.19%
DUVB2	Nails/Mani/Pedi/Artificial Nails	15.20%
DV	Manicure/Nails	18.34%
DVA	Nail and Skin Care	35.97%
DVQ	Manicure/Massage/Nails	16.27%
E	Shampoos and Rinses	11.77%
E.S	Scalp Treatment (with Electricity)	13.59%
E1	Management/Sanitation	64.88%
E1.y	Law/Regs/Mgmt	81.25%
E2	Hair Removal	46.53%
E3	Texture/Braiding/Extensions	4.38%
E4	IA Applied Practical Instruction	15.72%
EEM.Z	Economics/Equipment/Management	16.00%
EFL.Z	Shampoo, Waving/Relaxing, Coloring	14.83%
EGF	AR Hairdressing	14.68%
EH.Z	Hygiene/Ethics	62.50%
EM	Shampoo and Scalp Care	10.47%
EMHK	Shampoo/Scalp/Hairstyling/Braiding/Thermal Curling	13.80%
ER.Y	Ethics/Regulations	62.50%
ESC	Ethics/Salesmanship/Courtesy	10.42%
EZ.Y	Equipment/Safety	62.50%
F	Coloring and Bleach	12.64%
F1	Facials/Makeup	16.93%
F2	Business Practices	62.50%
FIL	Coloring/Waving/Relaxing	17.64%
Filing.Y	Filing	17.24%
FL	Coloring/Relaxing	17.78%
FM.Z	Facial Massage	18.47%
FMS.Z	Shampoo/Massage	15.12%
FSW.Z	Facials/Massage, Hair/Scalp, Wiggery	16.99%
G	Haircutting (Including Beard Trimming)	3.03%
G1	KY Curriculum 1	53.47%
G2	KY Curriculum 2	20.82%
G3	KY Curriculum 3	80.00%
G4	KY Curriculum 4	11.05%
GA.T.Y	GA Theory	62.46%
H	Hairstyling	11.32%
H.A2	Hairstyling (with Wiggery)	14.04%
H.E	Hairstyling (with Shampooing)	11.41%
H1	Shampooing and Scalp Care	10.47%
H2	Skin/Facials/Hair Removal/Scalp/Makeup	28.63%
H3	Use of Equipment	25.00%
H3PR.Z	Demographic Haircutting/Processing/Razor	13.91%
HA.Y	Hygiene/Anatomy	100.00%
HB.Z	History of Barbering	1.00%

HcP.Z	Haircutting/Processing	12.97%
HE.Z	History of Barbering/Equipment	13.00%
HGPD.Z	Hygiene/Grooming/Personal Development	66.67%
HH.Z	Haircutting/Styling	7.19%
HHSB.Z	Cutting/Styling/Shaving/Beard Trimming	20.81%
HI	Styling/Permanents	14.34%
HIFG	Other Hairdressing	11.09%
HIT.Z	HI Theory	33.53%
HKA2	Hairstyling/Wiggery/Thermal	16.94%
HKE3	Styling/Thermal/Braiding	16.02%
HsC.Z	Hair Structure and Chemicals	28.85%
Ht.Z	Styling, with Thermal	16.65%
I	Permanent Wave	17.35%
I.Y	Image/Consultation	1.00%
I1	Dummy Variable	5.00%
IA.AP.Y	IA Applied Practical Instruction	5.00%
IA.CLS.Y	IA Core Life Sciences	86.62%
IA.DL.Z	IA Demonstrations and Lectures	46.70%
IA.L.Z	IA Special Lectures	5.00%
IA.NT.Y	IA Nail Technology Theory	15.20%
IA.SPL.Z	IA Supervised Practical Instruction	19.09%
ICPS	Infection Control/Professional Standards	62.50%
IH	Image/Hygiene	50.00%
IKL	Permanents/Relaxing/Blowdrying	24.21%
IL	Permanent Wave & Relaxing	20.13%
IL.9.Y	IL Advanced Curriculum	17.60%
IL.B.Y	IL Basic Theory	78.53%
IL.Z	Waving/Straightening	20.13%
IS.Z	Implements/Shaving	36.24%
J1	Hairdressing/Haircutting/Wiggery	7.17%
J2	NE Lecture Theory	34.88%
K	Thermal Hairstyling	32.35%
KS.M.Y	KS Manicuring Skills	39.32%
KS.X.Y	KS Scientific Concepts	86.88%
KY.N.Y	KY Nail Care	14.85%
KY.X.Y	KY Scientific Concepts	80.14%
L	Chemical Straightening/Relaxing/Etc.	22.92%
L1	Sterilization/Hygiene/Anatomy	100.00%
LE.Z	Law/Ethics	62.50%
LM.Y	Law/Mgmt	62.50%
LMDE	Law/Ethics/Department/Management	37.75%
LME.Y	Ethics/Mgmt/Law	50.00%
LMHE.Y	Law/Mgmt/History/Ethics	37.75%
M	Scalp/Hair Treatments	9.17%
Mass.Y	Manicurist Massage	11.84%
MEIS	Mgmt/Ethics/Interpersonal Skills/Salesmanship	14.06%
MI.T.Y	MI General Theory	30.21%
MINN.T	MN Theory	13.69%
MLE.Z	Management/Law/Electives	41.66%
MLO.Y	Management/Laws/Optional	31.25%
MN.I.Y	MN Preclinical Instruction	79.23%
MO	Management/Optional	7.70%
MP.Y	Manicure/Pedicure	27.12%
MPPI.Y	Manicures/Pedicures/Polish/Implements	20.06%
MS.R.Z	MS Review	26.45%
MSBL.Z	Management/Sanitation/Business Methods/Laws & Rules	70.00%

MSE.Y	Management/Salesmanship/Ethics	12.75%
MT.M.Y	MT Management	39.57%
MT.S.Y	MT Sciences	95.60%
N	Eyebrow (and Other Hair) Removal	59.00%
NA.Y	Applied Sciences and Skills (Manicures/Artificial Nails/Sculpture)	19.78%
Nart.Y	Nail Art	1.00%
Nartb.Y	Airbrush Nail Art	1.00%
Nartf.Y	Artificial Nails	8.72%
ND.A	ND Compilation	32.64%
ND.R.Y	ND "Related Subjects"	73.26%
ND.T	Theory/Law/Disinfection	71.67%
Ndr.Y	Use of Electric Nail File/Drill	23.56%
NE.C	NE Cosmetology	7.12%
NE.N	NE Nail Technology	26.18%
NE.S	NE Science	69.30%
NE.T.Y	NE Theory	66.85%
NE1.Z	NE Theory I	33.18%
NE2.Z	NE Theory Ii	64.02%
Nf.Y	Nail Fill-Ins	8.72%
Ng.Y	UV/Gel Nail Treatments	3.76%
NM.MP.Y	NM Manicuring/Pedicuring	35.41%
NM.T	NM Theory	60.71%
NM.T.Y	NM Manicure Theory	53.50%
NMT.Z	NM Barber Theory	70.83%
Np.Y	Polishing and Nail Art	1.00%
Nr.Y	Nail Removal	8.72%
Ns.Y	Sculpting Using a Form	8.72%
Nt.Y	Tips with Overlay	14.01%
NV.T.Z	NV Theory	50.20%
Nw.Y	Nail Wraps and Mending	1.55%
O	Unassigned	0.00%
OH.G.Z	OH General Barber Practice	16.14%
OH.H	Draping/Shampoo/Hair & Scalp/Chemistry	32.09%
OH.H2	Hairstyling/Thermal Styling/Haircutting/Wiggery	13.46%
OH.S.Z	OH Scientific Barbering Practice	14.50%
OH.T.Z	OH Theoretical Study	66.88%
OK.B.Y	OK Business Development	23.44%
OK.T	OK Theory	19.82%
OW	Orientation/Rules	50.00%
P	Management	25.00%
P.O	Salesmanship/Dispensary/Reception	10.42%
P.Y	Nail Products	25.00%
P.Z	Product/Instrument Knowledge	25.00%
PA.P.Y	PA Professional Practices	42.00%
PA.S	PA Skills	20.57%
Pm.Y	Pedicure/Massage	31.66%
POA1	Management/Poise/Unassigned	8.67%
Prf.Y	Paraffin Wax Treatment	22.73%
Q	Massage	12.12%
QXP.Y	Science/Massage/People Skills	37.31%
R	Anatomy And Physiology	100.00%
RTPZ.Y	Anatomy/Chemistry/Product Knowledge/Sanitation	81.25%
S	Electricity	100.00%
S.Z	Salesmanship	1.00%
SBT.Z	Shaving/Beard Trimming	36.93%
SC.N.Y	SC Nail Technology	18.74%

Sc.Z	Scalp Care	25.37%
ScS.Z	Hair/Scalp/Shampooing	18.55%
SD.E	Esthetics (Incl. Facials/Makeup/Hair Removal)	36.62%
SD.H	Hairstyling/Shampooing/Thermal/Wigs/Braiding/Scalp	12.69%
SFM.Z	Facial Massage/Facial Hair Design	22.43%
Sh.Z	Shaving	47.48%
SIHJM.Z	Salesmanship/Image/History/Job Search/Management	5.20%
SLM.A	Salesmanship/Law/Management	50.00%
SM.Z	Salesmanship/Management	13.00%
SS	Shaving	26.38%
SSH.Z	Skin/Scalp/Hair	34.78%
SSS+.Z	Shampoo/Scalp/Styling (with Thermal & Wiggery)	25.40%
ST	Electricity/Chemistry	100.00%
T	Chemistry	100.00%
TN.C	TN Chemical	30.05%
TN.C.Y	Chemical (Incl. Product Knowledge, Nails, Epa/Osha, etc.)	50.71%
TN.C.Z	TN Barber Chemical Services	17.84%
TN.G	TN General	65.20%
TN.G.Y	General (Incl. Sterilization, Anatomy, Ethics, Law, etc.)	58.33%
TN.G.Z	TN Barber General Theory	35.91%
TN.P	TN Physical	14.42%
TN.P.Y	Physical (Incl. Massage, Manicuring, Artistry, Etc.)	18.45%
TN.P.Z	TN Barber Physical	15.68%
TSL.Z	Theory/Sciences (with Law)	100.00%
TX.AH.Y	TX Arms/Hands	65.19%
TX.MP.Y	TX Manicurist Procedures	14.23%
TX.PP.Y	TX Manicurist Practices	19.38%
TX.R.Z	TX Basic Barber Instruction	54.23%
TX.P.Z	TX Practice Barber Instruction	26.87%
TX.B.Z	TX Business Barber Instruction	51.74%
TZ.Y	Chemistry/Safety	100.00%
U	Pedicure	20.56%
U.Y	Specialist Pedicure	31.66%
V	Nails	18.24%
V.Y	Nail Theory and Practice, Incl. Disorders and Diseases	43.78%
VA.H.Z	VA Hair Services	9.71%
VA.T.Z	VA Barber Theory	33.32%
W	Law, Rules, And Regulations	100.00%
Wetc	Law/Ethics/History	42.00%
WH.Z	Laws/History	50.50%
WI.C.Z	WI Chemical Services	34.70%
WI.H.Z	WI Hair Services	20.65%
WI.S.Z	WI Shaving Services	43.80%
WI1	WI Requirements A	10.87%
WI2	WI Requirements B	37.05%
WI3	WI Requirements C	34.67%
WI4	WI Requirements D	27.00%
WSBT.Z	Shaving/Wiggery	22.04%
WV.A	WV Requirements E	100.00%
WV.B	WV Requirements H	13.68%
WV.B.Y	WV Procedure Curriculum	41.24%
WV.c	WV Requirements D	17.78%
WV.G	WV Requirements F	26.25%
WV.I	WV Requirements A	58.33%
WV.N	WV Requirements G	74.37%

WV.P	WV Requirements C	7.80%
WV.P.Y	WV Professional Curriculum	58.33%
WV.S	WV Requirements B	77.13%
WV.S.Y	WV Science Curriculum	86.30%
WV.T	WV Requirements I	15.20%
WV.T.Y	WV Art Curriculum	12.81%
WV1.Z	WV Professional Information	58.33%
WV2.Z	WV Introduction	0.50%
WV3.Z	WV Science	79.97%
WV4.Z	WV Professional Barbering	21.51%
WY.A.Y	WY Art Curriculum	12.81%
WY.C	WY Cosmetology Survey	68.71%
WY.C.Z	WY General Cosmetology	8.37%
WY.Ch.Z	WY Chemical Services	17.78%
WY.E	WY Esthetics	26.25%
WY.I	Infection Control/Professional Standards	62.50%
WY.N	WY Nail Survey	16.10%
WY.N.Y	WY Nail Curriculum	32.35%
WY.S.Y	WY Science Curriculum	84.34%
WY.S.Z	WY Science Of Hairstyling	69.77%
X	Science/Laboratory	100.00%
XSSH.Z	Sciences and Skin/Scalp/Hair Care	73.91%
XXZ	Sterilization/Science/Diseases	100.00%
Y	Theoretical Instruction	15.22%
Z	Sanitation/Health/Safety	100.00%
ZL.Y	Law/Safety	100.00%
ZWPA1	Sanitation/Law/Business Practices/Attitude	56.50%
ZZC	Business and Professional Relations	40.60%