
Board of Barbering & Cosmetology 2017 Environmental Scan

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Introduction

One of the first steps in developing a strategic plan is to conduct a scan and analysis of the environment in which an organization operates. This analysis allows us to look at the factors that can impact an organization's success. These factors are evaluated quantitatively and qualitatively.

This document provides a summary of the environmental scan recently conducted by SOLID for the Board of Barbering and Cosmetology (BBC or Board) beginning in May 2017. The purpose of this environmental scan is to provide a better understanding of thoughts and beliefs held by BBC stakeholders including (1) external stakeholders¹ and internal stakeholders consisting of (2) BBC Board Members and (3) BBC management and staff about BBC's performance within the following goal areas:

- ◆ Program Administration
- ◆ Regulation and Legislation
- ◆ Licensing and Examination
- ◆ Inspections
- ◆ Enforcement
- ◆ Education

This document outlines areas where (1) external stakeholders, (2) BBC Board Members, and (3) BBC management and staff agree and disagree while providing additional insight to assist BBC to develop goals and objectives in the upcoming strategic plan.

Please review this information carefully in preparation for the upcoming strategic planning session. At the planning session, the Board will discuss and evaluate this information as a group to help identify new strategic objectives that BBC will focus on during the next strategic plan period.

If you have any questions about this report please contact Elizabeth Coronel with SOLID at (916) 574-8394 or Elizabeth.Coronel@dca.ca.gov.

¹ consisting of the consumers, licensees, professional associations and public.

Acronym Legend

BBC – Board of Barbering and Cosmetology
BPPE – Bureau for Private Postsecondary Education
CA – California
CE – Continued Education
DA – District Attorney
DCA – Department of Consumer Affairs
DIR – Department of Industrial Relations
DOI – Division of Investigation
DRC – Disciplinary Review Committee
EDD – Employment Development Department
FDA – Federal Drug Administration
LA – Los Angeles
LE – Licensed Esthetician
LED – light-emitting diode
MSDS - Material Safety Data Sheets
MMA - Methyl Methacrylate
MT – Massage Therapist
NIC - The National-Interstate Council
OAL – Office of Administrative Law
QUATS - Quaternary Ammonium Compounds
SOP – Scope of Practice
SSN – Social Security Number

SWOT Analysis

Strengths, Weaknesses, Opportunities, and Threats

The purpose of the environmental scan is to capture concerns, issues, key points and suggestions related to major goal areas and compile results into trends and themes for the Board. This information is captured from all the Board's stakeholders. This is achieved through various collection methods including focus groups, interviews, and online surveys. While the collection method utilized for each group may vary, the information being sought is identical: an evaluation of the Board's strengths, weaknesses, opportunities, and threats.

Herewith is a summary of:

- Internal strengths and weaknesses for each of the Board's goal areas as provided through quantitative and qualitative feedback. Comments are summarized for an aggregated perspective of how external stakeholders, Board Members, Board management and staff perceive the effectiveness of each goal area. Refer to Appendix A for a complete list of comments.
- External opportunities and threats provided through qualitative feedback. Comments are summarized for an aggregated perspective of how external stakeholders, Board Members, Board management and staff perceive opportunities and threats impacting the Board. Refer to Appendix B for a complete list of comments.

Program Administration

The Board develops and maintains an excellent organization with effective Board governance, strong leadership, and responsible management.

<u>Rating</u>	<u>External Stakeholders</u> ²	<u>BBC Board Members</u>	<u>BBC Management and Staff</u> ³
Very effective	12%	71%	11%
Effective	52%	29%	67%
Poor	31%	0%	15%
Very poor	5%	0%	7%
Total	100%	100%	100%

Strengths Summary

1. External stakeholders perceive Board meetings as strengths. Board Members perceived colleagues as diverse and work environment as collegial.
2. External stakeholders perceive strength in Board management and staff. Specifically noted attributes included: determination, effectiveness and taking initiative. Efficiency was observed in interactions with the Board. Board Members praised Board management and staff as strengths. Specifically, Executive Officer Kristy Underwood was praised as accessible and dependable. Board management and staff observe strong internal leadership.
3. External stakeholders observe improvements in program administration. While Board management and staff observed support and management of process improvement.

Weaknesses Summary

1. External stakeholders perceive the Board lacking in its mandate of consumer protection.
2. External stakeholders observe a lack of accessibility. In response to program administration, external stakeholders demonstrated a lack of awareness in the Board’s administration.
3. External stakeholders and Board Members observe lack of communication and customer service. Board management and staff observe staff inadequately providing customer service. Management effectiveness and communication towards staff is viewed a weakness.

² includes: associations, consumers, educational institutions and licensees.

³ includes: executives, management, and non-managerial staff.

Regulation and Legislation

The Board supports statutes and adopts regulations, policies, and procedures that strengthen and support its mandate, mission, and vision.

<u>Rating</u>	<u>External Stakeholders</u>	<u>BBC Board Members</u>	<u>BBC Management and Staff</u>
Very effective	13%	0%	7%
Effective	41%	83%	79%
Poor	35%	17%	14%
Very poor	11%	0%	0%
Total	100%	100%	100%

Strengths Summary

1. All stakeholders perceive that the Board is striving for consumer protection through legislative changes.
2. External stakeholders praise the fact that quality and clear laws and regulations are available. External stakeholders, and Board management and staff observe up-to-date and proactive regulations and legislation. Board Members noted the efficiency and effectiveness in this goal area.

Weaknesses Summary

1. External stakeholders observe the Board as lacking communication with stakeholders.
2. External stakeholders perceive the Board's laws and regulations which include:
 - not supporting consumer protection
 - being conservative
 - being excessive
 - lacking stakeholder input
 - lacking clarity (*view shared by Board management and staff*)
 - outdated (*view shared by Board management and staff*)
3. Board Members observe a reactive approach in the developing laws and regulations.
4. External stakeholders and Board Members perceive the Board is not addressing scope of practice issues.

Licensing and Examinations

The Board provides applicants and licensees a method for obtaining and maintaining a license, while protecting consumers and allowing reasonable access to the profession.

<u>Rating</u>	<u>External Stakeholders</u>	<u>BBC Board Members</u>	<u>BBC Management and Staff</u>
Very effective	22%	29%	18%
Effective	57%	71%	64%
Poor	16%	0%	18%
Very poor	5%	0%	0%
Total	100%	100%	100%

Strengths Summary

1. Board management and staff praised the new examination manager.
2. Board management and staff noted the Board’s interested parties email process as a strength.
3. All stakeholders observe examination accessibility. External stakeholders noted the examination’s efficiency, effectiveness and overall improvement. External Stakeholders and Board management and staff specifically praised the examination proctors’ performance. Some external stakeholders and Board Members praised the new Mannequin Model examination feature. External stakeholder specifically noted the sanitation emphasis in the examination as a strength.
4. All stakeholders perceive the licensing process as efficient. External stakeholders specifically praised the licensure renewal efficiency. Licensure requirements were noted as a strength. Board Members observe licensure accessibility; cross-over licensure feature was specifically praised.
5. External stakeholders noted the Board’s responsiveness and procedures in the area of Licensing and Examinations.

Licensing and Examinations (continued)

Weaknesses Summary

1. External stakeholders and some Board management and staff observe the need for oversight of educational institutions.
2. External stakeholders noted a lack of examination accessibility. Some specifically noted errors in the foreign language examination while others noted the threats of providing the examination in foreign languages. Board Members and Board management and staff noted the foreign language examination pass rate as an area of concern.
3. All stakeholders observe the need for examination improvement. Many external stakeholders observe the new mannequin model as a weakness. It was also noted that the examination lacked quality and up-to-date information. National consistency was also noted as an examination need. External stakeholders perceived examination proctors as a weakness while Board management and staff noted the need for training of the national examiners (proctors).
4. All stakeholders noted the need for improvements in the licensing process. External stakeholders perceive the need for the reviving the instructor license. The need to improve various licensees' scope of practice was also noted.
5. All stakeholders observe a need for continuing education.
6. Board management and staff observe a need to improve customer service.

Inspections

Enhance the Board's inspection unit to improve effectiveness and ensure consumer education.

<u>Rating</u>	<u>External Stakeholders</u>	<u>BBC Board Members</u>	<u>BBC Management and Staff</u>
Very effective	14%	0%	0%
Effective	44%	86%	59%
Poor	35%	14%	38%
Very poor	7%	0%	3%
Total	100%	100%	100%

Strengths Summary

1. External stakeholders perceive the Board and its inspection program as a stimulus for licensees and establishment owners to maintain compliance. It was noted that inspections are frequent and unannounced.
2. External stakeholders observe inspection as effective and professional, while praising the inspector's knowledge and thoroughness.
 - Inspection of sanitation standards was specified as strength.
 - Inspections and inspectors are viewed as educational opportunities for licensees and establishment owners.
3. Board Members and Board management and staff perceive inspector training as a strength which has allowed for increased education and outreach during inspections. Board Members praised the inspector's performance while Board management and staff specifically praised the inspector's effectiveness.
4. Board management and staff observe improvements on daily procedures and the inspection process. Inspection staff's knowledge and performance was noted as strength.
5. Board management and staff observe improvement in citing by inspectors and fining by Board staff.

Inspections (continued)

Weaknesses Summary

1. All stakeholders observe insufficient inspectors. External stakeholders and Board Members noted an inadequate frequency of inspections. Board Members observe inadequacies in hiring and retaining of inspectors while Board management and staff reported high turn-over of inspectors.
2. External stakeholders observe inspectors lacking professionalism. The following was expressed regarding the inspector's professionalism: interruptions of services being rendered to clients and negative demeanor. External stakeholders perceive unannounced inspections as a weakness.
3. External stakeholders perceive inspections as ineffective.
 - Inspectors are perceived as lacking knowledge of the profession. Inconsistent knowledge amongst inspectors was specifically noted.
 - A lack of education being provided during inspections was observed.

Board Members observe the opportunity for inspector training. Board management and staff noted the lack of effective inspector management. Lack of inspector performance in various aspects was also noted.

4. External stakeholders reported unlicensed activity and establishment sanitation standards as a continued issue.
5. External stakeholders observe unwarranted and excessive citing during inspections. Lack of knowledge and inconsistency by the citing inspectors was specifically noted.

Enforcement

The Board protects the health and safety of consumer services through the active enforcement of the laws and regulations governing the safe practice in California.

<u>Rating</u>	<u>External Stakeholders</u>	<u>BBC Board Members</u>	<u>BBC Management and Staff</u>
Very effective	15%	50%	10%
Effective	49%	50%	52%
Poor	28%	0%	35%
Very poor	8%	0%	3%
Total	100%	100%	100%

Strengths Summary

1. External stakeholders perceived the Board’s presence as helpful and a stimulus for licensees and establishment owners to maintain compliancy. Board management and staff perceived the Board as supporting its mandate.
2. External stakeholders observe the Board as responsive to consumer complaints.
 - It was noted that laws and regulations are being enforced.
 - Fines were specifically noted as strength.

Board Members and Board management and staff perceived case processing as efficient and effective.

3. External stakeholders and Board Members overall perceived efficiency and effectiveness in enforcement’s daily operations. Board management and staff observed staff knowledge and collaboration as strengths. Process improvements were also praised as strength.
4. Board Members observed themselves as a cohesive group.

Enforcement (continued)

Weaknesses Summary

1. External stakeholders noted a lack of Board presence and accomplishment of its consumer protection mandate. The Board's lack of accessibility was also noted. External Stakeholders perceive there is, insufficient enforcement staff. Board management and staff noted staff's resistance to change.
2. External stakeholders perceive overall enforcement as ineffective and lacking strengths.
3. External stakeholders perceived the Inspections and Cite & Fine programs as lacking educational opportunities for establishment owners and licensees.
 - Citations and fines are deemed excessive and ineffective.
 - Fines are perceived as a mechanism for the Board to generate revenue.

Board Members noted lack of follow-up on citations issued during inspection. Board management and staff noted the Board's ineffective processes and lacking in the enforcement of laws.

4. External stakeholders noted the lack oversight for educational institutions. Board management and staff noted the need to gain educational institutions and apprenticeship oversight.
5. External stakeholders perceive the scope of practice and unlicensed activity issues are not being addressed by the Board.

Enforcement

DCA Performance Measures Summary

The performance measures demonstrate the Board is making the most efficient and effective use of resources. Performance measures are linked directly to a Board’s mission, vision, strategic objectives and strategic initiatives. The chart below shows the number of days between the stages of investigating a consumer complaint for the Board. The column labeled “target” is the goal the Board has established for itself. The remaining columns show the actual number of days to move a complaint from one step of the investigation process to the next.

Glossary of Performance Measure Terms

Volume - Number of complaints and convictions received.

Intake - Average cycle time from complaint receipt to the date the complaint was assigned to an investigator.

Intake & Investigation - Average cycle time from complaint receipt to closure of the investigation process. Does not include cases sent to the Attorney General or other forms of formal discipline.

Formal Discipline - Average number of days to complete the entire enforcement process for cases resulting in formal discipline. (Includes intake and investigation by the Committee and prosecution by the Attorney General.)

Probation Intake - Average number of days from monitor assignment to the date the monitor makes first contact with the probationer.

Probation Violation Response - Average number of days from the date a violation of probation is reported, to the date the assigned monitor initiates appropriate action.

Performance Measure	Q3 2017 ⁴	
	Target	Actual
Volume (number of complaints)	---	1,054
Intake (days)	10	3
Intake & investigation (days)	120	77
Formal discipline (days)	540	381
Probation intake (days)	15	9

⁴ Most recent data available.

Education⁵

The Board proactively educates, informs, and engages all stakeholders on the practice and the laws and regulations which govern it.

<u>Rating</u>	<u>External Stakeholders</u>	<u>BBC Board Members</u>	<u>BBC Management and Staff</u>
Very effective	10%	0%	18%
Effective	42%	71%	43%
Poor	36%	29%	39%
Very poor	12%	0%	0%
Total	100%	100%	100%

Strengths Summary

1. All stakeholders perceived online/website updates as strength.

External stakeholders observe the following strengths in the area of Education (outreach) being delivered to them:

- email updates
- laws and regulations updates
- reference materials

Board Members observe the following strengths in the Education (outreach) goal area:

- campaigns, flyers and/or posters *(view shared by Board management and staff)*
- participation in industry shows
- social media

Board management and staff specifically noted the Board's efficiency in using diverse resources to provide educational outreach.

2. Board Members perceive the Disciplinary Review Committee Meetings as outreach. It was also noted enforcement updates communication as a strength and form of outreach.

⁵ In context of outreach provided to stakeholders.

Education (continued)

Weaknesses Summary

1. All stakeholders observe lack of collaboration with and oversight of educational institutions.
2. External stakeholders perceive a lack of accessibility in the area of Education (outreach). Board Members and Board management and staff perceive budget constraints as a weakness impacting the Board's ability to conduct educational outreach.
3. All stakeholders see opportunity for improvement in providing educational outreach. Board Members and Board management and staff specifically noted areas for improvement which included social media and the website. External stakeholders specifically noted the following areas in need of improvement:
 - consumer outreach
 - dissemination of new/updated information
 - foreign languages
 - laws and regulations
 - i. obtaining stakeholder input
 - ii. disseminating new/changes in laws and regulations
 - scope of practice
4. Some external stakeholders perceive the need of developing and/or improving outreach in certain areas or to certain licensees including: Electrologist, Estheticians, sanitation, and webinars.

Opportunities & Threats

Trends

Opportunities Summary

1. The scopes of practice for various license types are perceived as an area that needs revisions and updates. Some specifically noted the scope of practice for Estheticians.
2. The Board is perceived as unaware of current industry trends. Industry shows are perceived as an opportunity for the Board to provide outreach and gain awareness of such trends.
3. Technology advancement and communication methods are perceived as an opportunity for the Board to communicate and provide outreach to stakeholders.

Threats Summary

1. The most popularly perceived threats include: deregulation, educational institutions lacking BBC oversight, employee versus independent contractor (booth renter's model), mobile services, political environment, selling of school hours, various issues deriving from scopes of practices, and unlicensed activity.

Stakeholders

Opportunities Summary

1. Perceived opportunities include communication with associations, advocacy groups and educational institutions, licensee input, and engaging with interested stakeholders.

Threats Summary

1. Disgruntled individuals, educational institutions, licensees, manufactures, and special interest groups are perceived as threats.

Relationships

Opportunities Summary

1. Perceived opportunities include building collaborative relationships with stakeholders including the Medical Board of California and the Health and Safety Advisory Committee, Legislation, the media and other state agencies are also perceived as opportunities.

Threats Summary

1. There is a perception that the Board's efforts are threaten by the Bureau of Private Post-Secondary Education, the District Attorney's Office, The National-Interstate Council, and the union.

Appendix A – Stakeholder Comments

This appendix contains the qualitative data relating to the Board’s strengths and weaknesses collected during the focus group, interviews, and surveys.

The comments in this appendix are shown as provided to SOLID. Comments that appear similar or on a specific topic have been organized into categories. Comments that were repeated multiple times are grouped with the amount shown in parentheses. The comments have not been edited for grammar or punctuation to preserve the accuracy, feeling and/or meaning the messenger intended when providing the comment.

Strengths

Program Administration

External Stakeholder Comments

Board Composition

1. Keeping folks on the board that are professional stake holders with lobbyist for the beauty industry.

Board Meetings

1. Good experience in attending board meetings.
2. Board members meet on a consistent schedule
3. Board meetings provide Board members and the public detailed and very helpful analyses and information.

Efficient

1. I have had contact with Administrators who are very efficient.
2. Social media response time is effective
3. emails are answered within 48 hrs
4. When I email questions or concerns, I get a response back very soon.

Improvement

1. It is much better than year's past.
2. Growth
3. The administration does a good job making changes and choices for the good of all licensees.

Management and Staff

1. You have been able to sustain this board for many, many years. There are those who desire to be a part of it.
2. The Board is a proactive team.
3. We really appreciate the staff of the BBC and their great willingness to work with the California Healthy Nail Salon Collaborative to improve BBC's communications with the Vietnamese community and with the healthy nail salon recognition programs working group to ensure that "healthy nail salons" are also compliant with BBC sanitation and other health standards.
4. I know that Calif. has more issues than most states because we test and license more people than most other states so the programs in place are good so to keep things smooth, we as an industry who are not involved in that part of it see strength
5. I give you "Effective" because you allow us to participate in receiving information directly from the Board. Otherwise, most of us Really don't have a clue what you do.

Strengths

Program Administration

External Stakeholder Comments (continued)

Management and Staff (continued)

6. I watch the webcast I noticed that there are very proactive always trying to get things moving
7. Senior BBC staff are top-flight, personally engaged and responsible for the BBC work product and responsiveness to industry inquires, concerns and suggestions.
8. We are happy with our California Board. It seems well managed and they are usually good with the staffing and budget from what we can see.
9. Given the resources available, I think they do a good job, but I think they are very motivated and want to do a better job. They seem to care about doing the best they can.
10. Strong leadership and dedicated staff
11. Nothing but kind words. :)

BBC Board Members Comments

Board Members

1. Board members committed to collegiately. Board members always try to find a way to reach a decision especially on reinstatements. Board agreements are effective in presenting appropriate working conditions on reinstatements. Especially when reinstating someone.
2. Board members do their homework. For example, Board members watch previous Board meeting videos to be prepared.
3. Diversity of the Board.
4. Collegial atmosphere, although disagreements occur, we respect opinions. Consensus usually comes among industry and public members.

BreZE⁶

1. BreZE been helpful in: decreasing application processing times from 6 months to 2 months, collecting data regarding Spanish speaking students and BBC Spanish examination, and streamlining.

Executive Officer and Staff

1. Kristy Underwood is top notch. She is good at hiring and promoting people, listens to Board and has her own opinions.
2. Great Executive Officer and leading staff who are very passionate and responsive when questions are asked.

⁶ Licensing and Enforcement System

Strengths

Program Administration

BBC Board Members Comments (continued)

Executive Officer and Staff (continued)

3. Executive Officer always well prepared, never hesitates for an answer and gives good answers too. However, she does not tell you something unless she is sure of it.
4. Indoctrinating new Board member. Executive Officer Kristy is really good with new Board members.
5. Board members can rely on Executive Officer to make the changes that she needs to make in order to administer the day to day changes.
6. Excellent Executive Officer and staff. For example, they respond in a timely and knowledgeable manner.
7. Leadership and the leadership being hired.
8. BBC staff is hands on, active, and supportive. Board members can talk to them and ask questions.
9. Organized staff. For example, BBC faced serious backlog in cases and staff organized and scheduled hearings which allowed Board members to hear additional cases and eliminate backlog. Another example is the streamlining of tasks for Board members to easily complete their jobs.
10. Staff keeping Board members informed and educated. For example, staff informs Board members of any changes in laws and regulations via email and phone. Another example, staff educates Board members on certain regulations to aid in more informed and best decisions for the consumers and licensees.
11. Great DRC staff, they know their stuff.
12. Unexpectedly impressed. Staff is very competent and work incredibly hard. Nothing but good things to say.

Responsive

1. The Board's respond to the industry.

BBC Management and Staff Comments

Board Members

1. Board member participation.

Internal Leadership

1. Strong leadership skills.
2. We have strong leadership with lots of experience with the Board.
3. Management team – collaborate together, and all on the same page.
4. Leadership is present, friendly and always willing to help!

Strengths

Program Administration

BBC Board Management and Staff (continued)

Promoting and Managing Change

1. Managers are open to change.
2. Upper management is evaluating all units for process improvements.
3. Visionary leadership always looking at new ideas/changes.
4. The Board has many managers.
5. Management continues to look for ways to improve processes.

Strengths

Regulation & Legislation

External Stakeholder Comments

Clarity

1. Clarity of law and rules
2. Codes are very clear.
3. Rules and Regs are clear and easy to follow/inspect
4. There are clear and written laws to follow.
5. Clear health-safety regulations that are tied to approved school curricula and examination content.
6. Clear rules, easily accessible via website.
7. When the updates happen the info is clear

Consumer Protection

1. I like that new rules and regulations come out for the safety of others.
2. making sure the client is always safe.
3. Good leaders
4. They do good with what they have. Dca should approve an increase in the boards budget to hire the appropriate number of inspectors so consumer protection is truly accomplished.
5. Willingness to consider public comments

Laws & Regulations: Availability and Quality

1. These things are available, however most of the profession do not use them...
2. I am glad to have rules in place.
3. You have created regulations, policies and procedures.
4. Once again the regulations are great if theres follow through. This comes from people taking the lead in the salons and schools to inforce regulations
5. Everything is regulated
6. Existing regulations are a start.
7. It is borderline effective and poor. The rules and regulations are followed by many.
8. Rules and Regulations exist.
9. They are posted on the web
10. Lots of regulations
11. Bylaws in place
12. There are a set of rules and regulations.
13. Solid health/safety laws and reg's with reasonable fee schedule.
14. The rules are standards that should apply for everyone in the business.
15. Making rules that accommodate the cosmetology fields
16. good rules and stiff fines
17. New laws are created by the administration.

Strengths

Regulation & Legislation

External Stakeholder Comments (continued)

Laws & Regulations: Availability and Quality (continued)

18. You have done a decent job of keeping Deregulation of our industry out of California. The BBC does have some of the strictest standards in the USA.
19. Strength is a good work they sure know how to strong arm you.
20. They are good at keeping sanitation a priority.

Up-to-Date/Proactive

1. In some areas we are ahead of the game.
2. Changes are being made.
3. offering this survey
4. good new laws for pedicures etc
5. Appreciate that the health and safety training is being revisited.
6. I see improvements regularly
7. Effort has been made to keep curriculum and practical testing relevant and updated.
8. They seem to stay on top of legislation and do what they can for the industry
9. Once again they are very proactive get everything done in a timely matter
10. Very responsive to industry trends, federal rules and statutory mandates. BBC staff work well with policymakers.

BBC Board Members Comments

Consumer Protection

1. The rules and regulations set the standards and holds licensees accountable when providing services to the public.
2. Regulation process gives the consumer the assurance they need when contacting BBC to discuss the services they received.

Efficiency & Effectiveness

1. Strong in regulations. For example, when tasked with creating or updating regulations there is efficiency and effectiveness. Also, work well holding up its integrity.
2. BBC constantly has regulation going through that adapts to the industry needs
3. A lot of cleaning of regulations.
4. Staff works very hard, seems to go very smoothly and well.
5. Diligent and strategic, the Board attempts to analyze from every angle. The Board is conscientious, does not jump on issues.
6. BBC is knowledgeable of what bills are going on in legislative.

Strengths

Regulation & Legislation

BBC Management and Staff Comments

Budget

1. Better budgetary considerations

Consumer Protection

1. many rules effectively protect consumers
2. regulations generally protect consumers (like foot spa regs)

Monitoring & Proposing Regulations

1. Continual evaluation of Board regulations and the proposal of new regulations.
2. We stay on-top of legislation.
3. Refined bill tracking method. Tracking method designed in-house to check bills.
4. Reevaluates current regulations and legislative issues to ensure change with industry.
5. Enhances or provides strength with new laws.
6. Successful regulation packages.
7. I think it is all very updated.
8. Maintains a strong and active position in active and proposed legislation.
9. Doing and seeing and implementing is what it takes actually be effective in writing proper Regulations and Legislation with a formal training and education level.
10. The Board constantly reviews proposed legislation and looks for productive ways to improve its regulatory language.

Relationships

1. Relationship with legislators.

Updating Stakeholders

1. Great at putting out the info
2. regulation information is easily accessible and communicated in multiple languages

Strengths

Licensing & Examination

External Stakeholder Comments

Accessibility: Foreign Language

1. language diversity
2. Providing testing in many languages has been GREAT! Being able to take the written examination and scheduling has been great.

Cosmetology Examination

1. Can only speak regarding Cosmetology license. Very thorough educational material and high standard of knowledge required for testing and obtaining license in CA.
2. Good coverage of different aspects of a cosmetologist
3. I think cosmo licensing test is good.

Examination

1. At least there is an archaic examination process in place.
2. The test seems well rounded.
3. Good job! The exam was strict but we need it!
4. Written exam
5. Safety of the consumer. The written test is harder than its ever been
6. The practical
7. written testing comprehensive assessments effective
8. They still have a written and practical exam
9. The written portion for manicuring, cosmetology and cosmetician coincide with the required reading materials.
10. Test was tough on how it was designed
11. Testing follows laws and procedures
12. Adequate timelines. Subjects/topics are kept basic to facilitate examination.
13. The test is easy
14. testing is universal and comprehensive
15. testing is thorough, website is good
16. It tests area of need
17. National Exam (NIC) provides an industry-relevant and regularly updated exam. Exam candidates know what to expect in the exam before arriving. Out-ofstate licensees have a streamlined process to obtain a CA license.

Examination: Efficiency

1. The examination is well prepared and organized.
2. I think the testing is done in a well timed fashion. I don't like the standing in front of everyone at the window waiting for pass/fail. But impasse so no humiliation
3. they have improved time frames much more efficiently.

Strengths

Licensing & Examination

External Stakeholder Comments (continued)

Examination: Efficiency

4. Exams are given in a timely manner
5. Testing is held often and the student has minimal wait time to take the test.
6. Students are advancing to the examination in a timely fashion.

Examination: Improvement

1. As an instructor the changes made to the examination has made it easier for the students to pass.
2. Applicants get to see immediately why they failed the test, and where they need to improve. It wasn't like that in the 1990's so good job.
3. has improved the examination process which is a real plus when it comes to attracting and increasing cosmetologist.
4. No live model was a good switch
5. and Models are more effective in regards to patron safety
6. I like that practical testing includes foil techniques now

Examination: Proctors

1. The Procter knows what he is doing. I like the immediate feed-back on passes/failures and being able to receive the license on the premises.
2. Examination process is set well to present the basic knowledge of ones profession. Proctors are a mix of strict and nice.
3. Testing is strictly monitored.
4. Fairfield cite is well run
5. HAVE THE CORRECT PEOPLE TESTING,

Licensing Process

1. It's easy to get a license.
2. You provide opportunity for individuals to obtain a license in their profession.
3. The system is quick and you have a license immediately.
4. STRUCTURED EASE OF APPLYING
5. BBC makes the licensing process clear
6. Establishment licensing as simple as possible with the licensing over the internet component.
7. Much improved, due to large school chain closing!

Licensure Renewal

1. Renewing is super easy online.
2. Renewal of The license is easy and fast.
3. I think the board has done everything possible to make the renewal

Strengths

Licensing & Examination

External Stakeholder Comments (continued)

Licensure Requirements

1. Guidelines exist for licensing.
2. You make sure people know what they are doing before giving them their license. I do think it is a great idea that you started putting pictures of the licensed person on their license. This way no one else can use that license. Excellent idea.
3. Everybody has opportunity to become licensed
4. It allows the state to see if the student has a basic knowledge of safety. (Can you imagine letting those bad ones get a license)
5. guidelines are clear
6. Number of hours required
7. The number of hours required to obtain a license is fair.

Responsiveness

1. I received my exam date in a timely manner
2. very responsive to our school's requests. Supportive
3. The license is issued immediately.
4. Processing speed
5. Very efficient in processing applications and administering exams.
6. Strong written communication
7. I believe the standards are being met in this area.

Sanitation

1. Emphasis on health, sanitation and consumer safety is very good
2. sanitation is great for basic exam
3. Watching closely for sanitary practices.
4. Very focused on cleanliness and sanitation.
5. The education and test requirements for sanitation are very good and help keep consumers safe.
6. Emphasis on sanitation training.
7. The practical and written tests are great. The tests aren't easy but really tested my knowledge of safety and sanitation and I felt thoroughly prepared to work as a salon professional after passing.
8. Having to take the test and show knowledge and sanitation is important
9. With the Pre-App for students applying for exam and having testing within a few weeks of graduating is great. Recent changes to practical exam are good. Emphasis on safety and sanitation is always important and we feel this area is still covered properly.

Strengths

Licensing & Examination

External Stakeholder Comments (continued)

Process/Organization

1. very impressed with the process and organization of it all.
2. Inspectors versus number of applicants are good
3. I feel this area is based on effectiveness and procedure if knowledge is there your job is effective
4. Processing applicants
5. Being thorough
6. Seems thorough enough
7. Advance notice is helpful, and so i's the grace period after.
8. Good background checks.
9. The examination application and preapplication processes are pretty straight forward. I saw nothing wrong with how those two things are accomplished. The same goes for the examination process. Both the written and practical exams were administered in a direct, easy-to-follow, non-intimidating manner.

BBC Board Members Comments

Exam Accessibility

1. Licensees able to take the practical and written exams at different times which allow time for preparation.
2. Availability of exams.

Licensure Accessibility

1. Pre-application process, candidate is able to apply for examination at 1,200 hours.
2. Dual-licensure, being able to complete needed hours for additional license.
3. Good job in eliminating the cross over programming making it easier for licensees to get dual licensure. Specifically, candidates/licensees only need to be examined in the missing elements of an exam versus retaking entire exam for the dual licensure.

Licensing Process: Efficiency

1. Ensuring a speedy process so that students are not waiting long to take the test. Within 30 day window.
2. Licensing staff is trying their best and significantly improved or reduced the application turn-around time.
3. Issuing of licensing after passing examination.
4. Great job in cutting the lag time down between the time a candidate requests to take a test to the time they actually take the test.

Strengths

Licensing & Examination

BBC Board Members Comments (continued)

Mannequin Model

1. Examination allows candidate to conduct certain portions of exam on a mannequin instead of live model.
2. Transition from live models to mannequins went well.

Scope-of-Practice Accessibility

1. The scope of practice for each licensee is listed out in order for the licensee to understand what they are allowed or not allowed to do. Specifically, details how the licensee protects the public while practicing within the scope.

BBC Management and Staff Comments

BreEZe

1. BreEZe.

Email

1. Processing emails timely.
2. Barning and Cosmetology email cuts down on phone calls.

Examination

1. Hiring experienced professionals – examiners.
2. Exam sites work through a large amount of application/ exams with proficiency and accuracy.
3. Exam Sites and Examiners very strong in their performances and duties
4. Gives exams on a daily basis
5. Providing fair and reasonable exam materials to candidates to help them prepare for the exam.
6. BBC has a large numbers of licensees, people without a SSN can get a license

Examination Manager

1. New exam site Manager, continue our process improvements.
2. New management at exam site.
3. Upgraded position at exam site form staff to management.

Strengths

Licensing & Examination

BBC Management and Staff Comments (continued)

Licensing Process

1. Processing applications timely.
2. Applications are processed timely.
3. Board current, no backlog. (2)
4. Licensing is very current.
5. The process is direct, and thorough.
6. no backlog, apps seem to be being processed timely
7. Licensing staff work through a large amount of applications with proficiency and accuracy.
8. thousands are people are licensed

Strengths

Inspections

External Stakeholder Comments

Board Presence: Inspections as a Deterrent

1. California does have inspectors which is a deterrent.
2. Sending inspectors to personally evaluate salons is an excellent way to keep professionals practicing safely and sanitarly.
3. The idea of inspections is great.
4. Salons know that an failed inspection has implications, so it's not a wasted effort.
5. Good way to keep stylist on their toes
6. They come often enough to make people want to stay compliant.
7. If an establishment is reported it is then inspected

Confirming Licenses

1. Checking that license are current
2. Checking on Salon to make sure the person matches the license

Inspecting and Educating/Informing

1. They offer advice and areas to improve when they are here without being mean about it.
2. Some enforcement agents use the opportunity to educate instead being nitpicky on small things that are irrelevant
3. Very informative
4. visiting establishments allow for question and answer time to inform of new and existing rules and regulation processes.
5. my lady was good and helped with questions.
6. When they do show up they do inspect, take pictures and explain what is wrong.
7. Checking to make sure license are current and salon is clean and sanitized
8. Educate as well as inspect realizes this is a operating business not a model home.
9. When they show up the explained with the flaws are in the salon
10. Inspection visits are very informative for us in our school. The agents typically will be forthcoming with information to share with the cosmetology students.
11. clear information given to public
12. Educational.
13. The inspector was informative as to new laws that will be effective soon.
14. Explains new rules and regulations
15. They are efficient, informative and reasonable in making inspections.
16. Continues to provide what we need in the areas of need

Strengths

Inspections

External Stakeholder Comments (continued)

Inspection Effectiveness

1. Its effective in that the inspections are rampant.
2. When they do come, they are effective in finding things.
3. Targeting Salons who need to be checked
4. Accurate assessment of establishments
5. Effective when inspected
6. It appears that the inspectors are fair.
7. When the inspector does show up they do inspect the salon
8. I think the BBC is effective for as many places as they need to go. I mean, there's a salon or barbershop on every corner in every town in the State!
9. Strict inspections
10. Good inspections

Inspection Frequency

1. Frequency of inspection
2. With consistent visits to establishments, the BBC is able to identify and penalize individuals or businesses who cause potential harm to clients during services.
3. Consistency in inspections
4. For many years State Board was not doing their job sending inspectors out on a regular basis. I owned a salon for 15years and State Board came in only twice during that entire time. Today is overboard, inspectors coming in constantly. I appreciate the inspection on a regular basis but this has been bordering on harassment. So yes, I am glad you are inspecting many need to be but constantly searching and looking for something negative is wrong and not helpful.
5. COMING FOR VISITS
6. They frequently tour licensed businesses to make sure they are complying to the codes.
7. Great job at following up in established salons and spa.
8. State board visits to professional establishments
9. They seem to be staffed enough to inspect salons on a regular basis
10. Most establishments are visited at least once.
11. Well, they do come consistently now.
12. You do them occasionally

Inspection Thoroughness

1. I like that inspectors check everything when they drop by for inspections are very professional
2. The field inspectors are fairly thorough.
3. thorough inspections

Strengths

Inspections

External Stakeholder Comments (continued)

Inspection Thoroughness (continued)

4. Thorough inspections performed
5. good a thorough inspections of establishments
6. When inspector has come, she is searches through everything
7. Inspections are through and resources for consumers to check licenses are good
8. They are very thorough during their establishment reviews.
9. Inspectors are thorough.
10. Inspection is thorough and helps us remain compliant.
11. When they do inspection are thorough!
12. The inspectors do a great job observing and checking establishments
13. Thorough, checks all areas.
14. Fairly thorough.
15. They do look in cupboards and products that are out in the Esthetic room
16. They inspections are thorough
17. Very thorough inspections
18. Inspects the salon very thoroughly
19. They seem to be very strict and check all details when they do show up to licensed businesses.
20. Very thorough in inspections
21. very thorough review process
22. Thorough

Inspector Knowledge

1. They seem to be on top of things and knowledgeable when there is an inspection.
2. The inspectors are very knowledgeable and consistent when at an establishment. This keeps integrity in our industry.
3. When present they do a good job
4. Accurate assessment of establishments
5. Reaching Manicure/pedicure salons that are not compliment. Inspectors are well versed in that area only.
6. Well informed inspectors
7. The inspectors we have had are very knowledgeable and helpful.
8. When there are inspections the inspectors seem to know what the laws.
9. Staying true to codes while inspecting.
10. know current areas and specific details to check

Strengths

Inspections

External Stakeholder Comments (continued)

Inspector Professionalism

1. Inspector is pleasant and helpful.
2. Knowing an inspector has the power to fine a professional if he or she has failed to follow salon protocol is a great way to keep professionals up to date and safe.
3. Inspectors have gotten much better and do not come off as mean (as they may have in the past).
4. Inspectors do a professional job mostly.
5. I have been checked twice in just a few years and the gal was nice and informative.
6. They are very professional when they first enter the facility.
7. Professional inspections. Friendly people.
8. Good intentions
9. Most inspectors are trained to deal with negativity.
10. Professional, pleasant
11. The inspector was friendly
12. is happy to answer questions and concerns.
13. There are some very good inspectors, most work very hard.
14. I feel the inspectors do the best they can.
15. WHEN they do come to establishments good customer service.
16. They are well prepared.
17. My last inspector visit was very pleasant- even though I received a few citations. I have had this inspector before and she was not very likeable/ pleasant. Different story this visit. I appreciated her disposition.
18. The Inspectors are so student friendly and helpful with questions.
19. The inspector that I had was excellent. She did her job efficiently and professionally.
20. Most of the inspectors are pleasant

Sanitization Standards

1. Cracking down on and enforcing sanitation standards in nail salons.
2. The enforcement of sanitation requirements
3. They look for labeling and sanitation
4. i.e. ensuring that items are properly labeled and there is no cross contamination.

Unannounced Inspections

1. Arrive in announced
2. Surprise visits are the key
3. They have salons in their toes awaiting surprise inspections. And give out fines accordingly.

Strengths

Inspections

External Stakeholder Comments (continued)

Miscellaneous

1. They do make efforts to inspect salons, with the low number of staff available. Something is better than nothing.
2. Inspections (2)
3. Moderate
4. Very satisfied with the inspections
5. I appreciate our inspectors and all that they do. I do respect the system.
6. Covering Calif.
7. Look at there records
8. Adeqate
9. Providing citation.
10. Responding to complaints
11. Good with Beauty Schools

BBC Board Members Comments

Inspection as Outreach

1. Developing videos on the importance of inspections and why the purpose of inspecting establishments. Specifically, disseminating the message that inspections are for the safety of the consumer, thus everything the licensee was taught and learned through experience in school should be applied in workplace in order to protect consumer.
2. Self-inspection worksheets disseminated by: inspectors to licensees during inspections, and by the Board during DRC hearings. These self-inspection worksheets helps to make sure the licensees are following rules and regulations.
3. Tremendous strides in dealing with licensees who do not speak English. For example, creating different kinds of citations, and having a translator available over-the-phone if needed.

Inspector Performance

1. Inspectors always willing to take constructive criticism.
2. Inspectors are thorough and document things well which allows enforcement with evidence.
3. Some good inspectors are approachable and provide feedback and education in a positive manner. Inspectors share their knowledge and help licensees understand areas they may not be familiar with.

Strengths

Inspections

BBC Board Members Comments (continued)

Inspector Training

1. Training of inspectors. For example, inspectors conclude inspection with explaining to the licensee why they were cited. Also, the inspectors are able to inform licensee prior to issuing citations.
2. Inspectors and training. Board has regular meeting with inspectors to discuss issues and new regulations. Also, Board members are able to ride along with inspectors.
3. Board's corrective meetings with inspectors.
4. Inspectors obtained training and resources to communicate with licensees who speak diverse languages. For example, inspectors are provided with resources like reference materials for dissemination.
5. Ensuring that the Board is training its inspectors in order to help inform and educate business owners on how to avoid being cited and/or understand why they were cited.

BBC Management and Staff Comments

Cite and Fine

1. Cite and fine no backlog.
2. Establish processes that work such as cite and fine,
3. The inspections unit have improved their processes to streamline issuance of a citation. Limited English proficient individuals are offered options.

Inspection Effectiveness

1. Investigating consumer complaints effectively.
2. Effective when performed.
3. Inspections assigned to new geographical areas.
4. Compliance inspections oppose to full inspections.
5. In keeping up with regular inspections, to keep salons and facilities at it's best.
6. BBC does routine inspections, not just responding to complaints.
7. Bad shops are followed up on, complaints are investigated.
8. Inspections help the licensee's to understand the rules and regs and what they are required to comply with.

Inspecting and Educating/Informing

1. a few good inspectors who care about their territory and put in a good days work, educating and enforcing the rules
2. roles and responsibilities.

Strengths

Inspections

BBC Management and Staff Comments (continued)

3. Licensees are educated on how to remain compliant when citations are issued. For example: foot spa cleaning procedures, and illegal instruments flyers.
4. Open dialogue with inspectors.
5. BBC has inspectors that can have face to face conversations with licensees and consumers about compliance with BBC regulations.
6. Inspectors do their job because we work with it on a daily basis and we experience it first hand.

Inspector Training

1. The Blue List, helps the inspectors their direction on establishments that have been inspected.
2. Inspectors have received training in many facets of their scope of work.
3. Increase training given to inspectors. For example language access, how to cite, and their Inspectors are focused on educating currently.

Process Improvements

1. Improvements on daily processes have occurred leading to no back log.
2. New processes being implemented.
3. The Board has recently started to improve Inspection processes.
4. Establishments that have not been inspected in over 5 years are now the focus of the inspections.
5. Inspectors are focused on inspecting establishments that have not been inspected in a while.

Staff

1. Fully staff in-house.
2. Season staff that knows their job, cite and fine and inspections.
3. The ability to run reports. Opens new areas for improvements.
4. Efficiency with process, staff has the knowledge and experience of answering calls.
5. Staff is flexible and works hard to cover a large diverse state.
6. Management

Strengths

Enforcement

External Stakeholder Comments

Addressing Complaints

1. BBC takes action upon the filing of a complaint and enforces the rules governing each profession
2. Responding to consumer complaints, working with establishments to better comply with the law.
3. I do know that when I had an actual formal complaint they went to the salon to try to handle it within the month but as far as the enforcement goes I still think it was not dealt with properly
4. seem responsive

Board Presence

1. The fact that people know that there are laws that they have to adhere to is good.
2. I believe the BBC can be of great help to the cosmetology industry and the consumers.
3. They are very effective in there presents
4. The threat of fines keeps many practitioners in line.
5. Your presents are known so we know you send out people.
6. The fact that there is a state board agent that comes around is good.
7. keeps practitioners in line.
8. They are on the correct track and look to ensure safety.

Cite & Fines: Fines

1. They seem to be enforcing fine. I don't hear about any major issues.
2. They regularly dole out fines,
3. Between effective and poor is a large gap. . . Somewhat effective. Enforcement sitting down as a team to decide on citations vs. a single individual making that decision.
4. I think that the established fines for health and safety in schools and salons help with the enforcements.

Effectiveness

1. Moderate in enforcement
2. Seems to be pretty regular
3. Finding unlawful conduct
4. Shop and workers properly licensed, licenses displayed
5. Returning correspondence.
6. When bonafide concerns arise, it is managed.
7. I know there is an issue of being short handed however, having a team that keeps track of very few.

Strengths

Enforcement

External Stakeholder Comments (continued)

Effectiveness (continued)

8. When inspections reveal non-compliance, action is taken by the board to correct the problem.
9. They have done an excellent job of catching up with disciplinary review so licensees do not remain in limbo when they have been written up.

Enforcement of Laws & Regulations

1. You are trying to open to change and do try to enforce rules when they are broken.
2. They hold people accountable for their actions of not cleaning properly.
3. Follow regulations posted
4. Ensures compliance with health and safety regulations
5. the method of violation penalty are very effective
6. That the enforcement is happening
7. Enforcing the rules
8. enforcing the laws of the BBC
9. Decent due process with enforcement unit reviewing all inspection reports before fines are issued.
10. The BBC generally does a proficient job in enforcing penalties for sanitization or disinfection for establishments
11. When they do enforce are thorough!

BBC Board Members Comments

Board Members

1. Board members aim to always reach consensus without arguments.

Case Processing

1. Good at processing cases in a fair manner. When processing cases, a main goal is to educate and help licensees improve.
2. Good process. BBC is consistent and collaborative during completing enforcement cases.
3. Cite and Fine staff is very good at sorting through and determining what violations should go through as fine.
4. Efficient in processing inspection reports, little delay in issuing enforcement infractions.

Staff Efficiency and Effectiveness

1. Internal staff is extremely efficient at responding to a Board member's question. Staff responds with proper information that Board member needs in order to make the most appropriate decision in enforcement cases.

Strengths

Enforcement

BBC Board Members Comments (continued)

Staff Efficiency and Effectiveness (continued)

2. Staff is willing to help the public. They listen to the proposed changes coming through DRC where people communicated their problems.
3. Enforcement staff has done a good job at recording and documenting precisely what they are doing and seeing.
4. Staff has been working hard to streamlining the processes.

BBC Management and Staff Comments

Case Processing

1. BBC attempts to enforce laws by contacting individuals allegedly violating laws by any means possible.
2. a lot of citations are issued, complaints are investigated
3. In the majority of cases we are able to verify compliance.
4. analysts educate shops on how to become compliant with rules, especially bad shops are formally disciplined
5. Most complaint cases are closed after one inspection.

Process Improvements

1. Refinements in how practices of medicine cases are handled.
2. Currently reevaluating the internal evaluating processes. There is a willingness on management's part to improve the process.
3. Case files are going electronic. Utilizing BreEZe.
4. Streamlining the process of compliance.
5. Staff and management is agile in adjusting to changes in laws and new trends in the industry.
6. The unit manager and the staff lead seem to have the desire to participate in process improvement.
7. Refinements in how practices of medicine cases are handled.

Staff

1. Management/Staff
2. a few honest dedicated people do their jobs on a daily basis
3. Staff/everyone on the same page
4. Fully staffed (2)
5. Knowledgeable staff.
6. knowledgeable manager, procedures that are set in place

Strengths

Enforcement

BBC Management and Staff Comments (continued)

Supporting Mission/Mandate

1. Protecting the consumer.
2. Practices that support the laws and regulations.

Strengths

Education

External Stakeholder Comments

BBC Curriculum

1. The curriculum provide by the BBC is good as long as the school teaches it.
2. Solid core curriculum

Educational Institutions

1. Good at the community college level.
2. My education was tops.
3. The pathogens education seems well thought out.
4. Very good with theory and basic educations.
5. Teachers know what they're teaching
6. better at communicating to us schools of updates.

Effectiveness

1. It's effective, with what is in place.
2. I believe the standards are being met in this area.
3. BBC information dissemination is highly effective
4. They are good at addressing and responding to immediate situations/problems with unbiased information.
5. I LOVED seeing the board at the Face and Body show a few years back.
6. Getting better

Email Updates

1. Through the continued email updates
2. Appreciate the online bulletins and the mailers of new information
3. Magazines mail internet
4. Email notifications are effective!

Foreign language

1. BBC's great progress in translating documents into Viet.
2. Efforts to translate such information have been very helpful.

Laws & Regulations

1. You post laws and regulations online
2. It is great that the BBC informs us of the laws and regulations to keep us abreast of the field.
3. Regularly keeps stakeholders informed about changes or potential changes to the laws and regulations.
4. Online rules and regulations are easy to access
5. the rules are made very clear.

Strengths

Education

External Stakeholder Comments (continued)

Laws & Regulations (continued)

6. providing lots of meeting for the changes of rules and regulations to change practices.

Online/Website Updates

1. BBC website is chalk-full of helpful information, making Board actions/meetings and laws/reg's very accessible.
2. There is alot of info on your website and facebook.
3. AS AN EDUCATOR, I FEEL THE INFO ON THE WEB SITE IS VERY EDUCATIONAL
4. It is simple to navigate the website for updates, and information put forth by the board.
5. I like that most information is available at my fingertips on the website.
6. All of the information is available online.
7. Website is easy to use and you can usually find information you need.
8. You have online information regarding practice and the laws and regulations.
9. "I feel we as an industry are kept ip on the latest things happening.
10. Growth with need to know on website
11. I gave you "Effective" only because you have done quite a good job of outreach to us via the internet.
12. BBC website is informative.
13. Good reference materials available on line
14. the posted information is readily available on website
15. I like that we can go on the website at any time and look up things and I think that is a great strength of you guys
16. Lots of info on the website and social media.
17. Good website.
18. Everything online
19. information is clear and available
20. Really, I'm getting the info from Ca. Esty Ad. group on F.B.And, your F.B. page.
21. Good intentions and outreach through Facebook
22. Information is there should you seek it. Website is a good tool. Delivering tools such as videos regarding consumer protection
23. The webiste is very helpful. I am appreciative of the paper mail that we get to back up the website.
24. Updated information is available and I am grateful that time and effort has been put into revising some long overdue info.

Strengths

Education

External Stakeholder Comments (continued)

Reference Materials

1. Good info/reference material available to establishment owners to help us comply
2. Write up forms. Managing expectations from spas. Available materials to review or self inspect
3. The materials we are given are good for basic knowledge.
4. The compliance checklist for business owners is very useful.
5. Inspection Consumer poster
6. Whoever is responsible for creating the new manuals did a great service to California's beauty industry - bravo!

BBC Board Members Comments

Campaigns, Flyers and Posters

1. Campaign See Something Say Something which was directed to consumer with the purpose of informing them of BBC's mission to protect the safety of the public, informing them of the rules and regulations, and encouraging to voice concerns.
2. Flyers and pamphlets to address the consumer and licensees. For example, consumers are typically alarmed when an inspection is being conducted so flyers are disseminated to inform them of the purpose of inspections and to avoid misconceptions.
3. Updating consumer posters to a positive outreach (previously impractical and unappealing for consumer to read). The poster contains rules and regulations for the consumer in a manner that is more accessible. It informs consumers that they have a voice.
4. Providing reference materials in diverse languages.
5. Developing resources to help educate non-licensees on the rules and regulations

Disciplinary Review Committee as Outreach

1. DRC hearings implemented translators to help enhance communication between the Board and licensees.
2. The individuals that serve on the DRC, they take it seriously and go above and beyond.
3. Reviving of translators in DRC meetings (about 6 months ago).
4. BBC provides interpreter for hearings.
5. Improving public education. For example at the DRC hearings the Board provides educational tools to the public through reviewing the citing of various violations.

Strengths

Education

BBC Board Members Comments (continued)

Educational Videos

1. Videos on our website that demonstrate skills or as a refresher for licensees who have been cited.
2. Use of YouTube and the number of videos that demonstrates to licensees how to properly disinfect bathtubs.

Enforcement: Updates

1. Updates are communicated and in CA we have an estheticians facebook page that helps support bbc's notifications
2. Good communication about Rules and Regulations

Industry Shows

1. BBC attends many of the trade shows and hair shows.
2. Attending trade shows for outreach to licenses.
3. Present in various industry shows. For example, BBC's presence at the hair show has been helpful for licensees because they can ask questions before investing on expensive illegal or inappropriate tools for usage under scope of practice.

Social Media and Website

1. Proud of BBC for using social media platforms. Specifically, noticed that people are active on Facebook. Social media is a very effective tool to keep licensees and consumers informed and educated. Also, questions and concerns are answered via social media.
2. Increasingly savvy about providing updates via social media.
3. Facebook page to encourage communication between consumer/licensee and the Board.
4. Being mindful of health and safety issues and presenting that on Facebook and website to help consumers understand all areas of Barbering and Cosmetology. Good job in informing the consumer.
5. All the information at people's finger tips at BBC's website
6. Posting on Facebook and social media for consumers
7. Improving usage of social media.

Other Outreach

1. BBC's outreach to Vietnamese establishments and to Asian nail collaborative.

Strengths

Education

BBC Management and Staff Comments

Campaigns, Flyers

1. Outreach with the industry. For example, trade shows hold booth, town hall meetings, and campaigns: Safe Sandal Season, Safe Salon.
2. Licensees are being educated on how to be compliant. For example, self-inspection worksheets, most common violations, and fine schedule.

Outreach Efficiency

1. Proactive in looking for non-travel options. For example: Facebook, Twitter, videos, Trifolds, campaigns.
2. resources are available online, resources are in different languages
3. Uses diverse means to educate, letters, inspections, website, and DRC.
4. The strength and weakness is in the inspector who provides and educates with information given during the inspection

Safety Curriculum

1. New health safety curriculum development for schools

Updates

1. Provides online updates
1. Yes I agree The Board is proactive on posting new information.
2. definite improvement in the past couple of years

Website

1. Website is updated regularly.
2. Website improvements are continually being addressed.
3. Provide educational information to consumers on the website
4. lots of resources on website in different languages
5. New publications/bulletins appear on the website.
6. Industry bulletin – notice in regards industry.
7. there are so many places to get educational information, BBC's website is great, has tons of information on all aspects of the board.

Weaknesses

Program Administration

External Stakeholder Comments

Accessibility

1. In the past we have had a hard time getting through on the phone. I think that has been improving though.
2. Don't just let anyone apply for the program, make sure they are a legal citizen for the country
3. The office hours are short.
4. not enough town hall meeting to generate inclusiveness to both the students, educators to hold administrators accountable.
5. Meeting and if we want to hike all the way to Sacramento we can attend. Woo Hoo! You need to connect Better with us, maybe by live streaming your sessions and allowing us to view them.
6. hard to connect
7. No phone answering. The industry dosent know whats going on
8. open to the public but not informing us early enough so we can submit field trip paperwork for the students to attend and learn about their industry. More time would allow for subjects to work on an address to the board.
9. Allowing illegal immigrants to practice cosmetology.

Awareness

1. Just okay..
2. Haven't had any experience with the Program Admin of the BBC.
3. I have no idea, this information is not shared with licensees unless they search online for it.
4. I should be more involved in this area to have a better opinion.
5. If this is happening, I have had no exposure.
6. Not sure I have enough info to really judge this area.
7. I don't know what this means??
8. I am unaware of how the BBC in involved in Program Afministration.
9. I don't have any reference to base an opinion for the question.
10. I have no idea, this information is not shared with licensees unless they search online for it.
11. I don't know what this is...
12. Not sure I have enough info to really judge this area.
13. I don't know what this means??
14. I am unaware of how the BBC in involved in Program Afministration.
15. I don't have any reference to base an opinion for the question.
16. I have no idea, this information is not shared with licensees unless they search online for it.
17. What programm?

Weaknesses

Program Administration

External Stakeholder Comments (continued)

Board Composition

1. No one on the board is in this industry, it seems like 50% of the board should be retired people from this industry
2. As part of a board a member only can do so much because for any change to be done most of Them have to agree and the process may take long to be completed, so for changes may take long to be applied.
3. THE BOARD MEETINGS ARE A JOKE! get people who want to pontificate and have a special interest out of the room. have you noticed how few cosmetologists actually go to the meetings? there is a good reason you spend the entire meeting on some bullshit idea nobody cares about that will do nothing.
4. There are not enough licensees on the board. We need to be represented. Some of us who might like to serve are not able to die to the hardship of leaving behind businesses and traveling to Sacramento once a month.
5. I would hire 30 year plus cosmetologist seriously running the board
6. Kristy tries her best but she is surrounded by people who can care less. to many school interested people on the board. put salon owners on the board. NO SCHOOL OWNERS!!!
7. Term Limit should be in place for Director Position to bring accountability to position instead of a State retirement check as Carrot in front of nose process with lazy managers in place.
8. How does the board take into consideration the needs of the LE's if there is no Esthetician on the board? The school owners (and schools) aren't in touch with how rapidly technology is moving and aren't even managed by the bbc.
9. There MUST be an esthetician on the board. Each profession is supposed to be represented and it's not.

Budget Constraints

1. Too little resources to do a great job.
2. When there is not enough staff to help the instructors process work it can become very confusing and cause time delays, which causes frustration for both student and instructor

Communication/Customer Service

1. I think the BBC should keep owners of salons and schools notified more on the programs. Alot of times they don't seem to get why their managers try to do things a certain way because of what the BBC does
2. Some of the changes have been vague and there is not a clear cut off time period. Perhaps when you make changes, you can let schools have a contact, so that questions can be answered and clarified for a smoother transition.
3. The everyday consumer results speak for the current system.

Weaknesses

Program Administration

External Stakeholder Comments (continued)

Communication/Customer Service (continued)

4. I believe that there needs to be better communication between "the notice's" that we sign up for, which really say nothing much
5. As a school owner no communications
6. Email and phone communications are very poor, the path for licensing for new residents wishing to seek reciprocity is prohibitive and costly. Poor staffing does not allow for the growth of the agency or the industry.
7. the motto is: Don't call, just send an email. They will transfer you everywhere and then hang up on you.
8. some subjects in L.A. and not in Northern California to get our input
9. Poor communication, bad customer service, and lack of relevant knowledge.
10. Those answering phones sometimes give misinformation. Timely processing of apprenticeship licenses, hit and miss. Sometimes very timely, sometimes not so good. Apprentice Salon Transfers do not have an efficient system, poor! When something is promised in an email and then turns out, things were not followed through with. Makes the BBC look very unprofessional!
11. Some Admin should be taped during call
12. I once wrote the board to find out if microcurrent was legal in California. The answer I got was, "What is microcurrent?" Really, people?!?! I had a massage therapist I rented space to question the need for me to be present the entire time my salon was open since I was a license holder and she, as an MT, was not licensed. She told me whoever she spoke with at the BBC told her I was lying to her. NOT COOL. Get your story straight.
13. Slow processing of applications does not meet what their own cosmetology acts and rules say they are to do.
14. Website was confusing for student and operator to search and find the needed information.
15. The only weakness is bureaucratic
16. I have personally reached out to the Board with questions regarding specific laws and regulations and I was provided answers. Fellow licensed friends of mine asked the same questions and received different answers. We compared our email responses from BBC and I couldn't believe it! The BBC employees should know all the Ca laws and we should be getting the same answers and responses from you!
17. Train your staff well and only employ those fulfilling their job requirements in an effective manner.

Weaknesses

Program Administration

External Stakeholder Comments (continued)

Consumer Protection

1. It seems the boards agenda is not relevant to the work of the licensees or the needs of the public
2. There is none and what there is is connected with the lobbying group and large private schools.
3. The BBC governance seems to be easily swayed by uninformed Senators who attempt to pass things that are only in their best interest.
4. The only reason for you to exist is to insure the health and safety of the public. What you have become is a bureaucratic dictatorship to figure out ways to fine people in the industry for not following ridiculous made-up rules that have NOTHING to do with health and safety.

BBC Board Members Comments

Communication

1. Need better communication between units.
2. Communication issues with staff in regards to reimbursements. Better communication is welcomed.

Working Board Members

1. Working Board members may not be enough in an industry that has a lot things going on.

BBC Management and Staff Comments

Management & Staff Communication

1. Manager time for follow up. Managers should spend more time following up.
2. Many times, good ideas are enacted but are not sustained. Continued lack of communication between management to management and management to staff. Lack of trust within the management.
3. lack of communication which in turns reflects as inefficient
4. Leadership & Supervision is not of a quality that promotes good employee/employer relationships.
5. changes made without explanation why
6. disorganized, no one knows what other units do or their processes
7. Lack of direction, direction is not communicated, communication is poor

Weaknesses

Program Administration

BBC Management and Staff Comments (continued)

Management Competency

1. Management shows the lack of leadership or lack of a formal education in management by creating more work with a thousand lists.
2. Management believes that they know what they are doing without actually doing the job from beginning to end. THEY THINK THEY DO BUT HAVE NOT ACTUALLY DONE IT. IT'S 2 DIFFERENT THINGS DOING AND SEEING.
3. Managers need to improve their skills (Communication, organization, staff training, customer service and setting a good example)
4. Reactive management style with upper management being to involved in day to day operations. More focus on managers managing and not processing.
5. micromanaging, mission of Board seems to be lost, poor performance of employees should be addressed with them directly and not dealt with by changing the policies for everybody, policy changes are made without proper knowledge and consideration of the ramifications

Meetings

1. Not enough all staff meetings.

Staff

1. staff doesn't know laws and give out wrong information
2. staff transfers calls instead of answering licensees questions
3. some staff aren't efficient or productive

Weaknesses

Regulation & Legislation

External Stakeholder Comments

Apprenticeship

1. I wish the Board would think about what is lawful concerning apprenticeship. It took a lot of time and energy on my part to get the statement by the Board concerning price limit taken off the State website. This was blatant discrimination against apprenticeship programs. The program Sponsors are responsible for all the costs of operation for the apprenticeship program. Rent for the facility, instructor salary, supplies, insurance, etc. when the Board put this up on the website under apprenticeship it was like a slap in the face. The Board not once asked me what my expenses were, or any other apprenticeship program. We are self employed contractors and the Board does not contribute monetarily to any of the programs, yet they thought it was up to them to decide what should be charged and what shouldn't? This is our business! I find the Board's (or certain people that were in charge of this at the Board) behavior on this matter reprehensible. And of course, obviously discriminatory.

Clarity

1. Rules and regulations are vague and do not clearly define what modalities and products are regulated and/or approved.
2. In some things you are Not clear enough as to why. Example; the pedicure thrones being sanitized and disinfected that was a extremely confusing procedure to follow, it was very slow to get on the website as I looked for months and months for it. If you are going to make a policies and procedures and make fines for them make ABSOLUTELY SURE you have a effective way to disinfect these things and put that on the state board site along with the penalties.
3. Clearly defining modalities: LED spectrum, Microcurrent usage, microblading guidelines, approved lancet uses, continuing education requirements, licensing educators, regulating manufacturers.

Communication

1. New regulations need to be sent to Cosmetologist regularly updated should be sent out in a timely fashion
2. Your information sharing of your newly adopted regulations, policies and procedures are not available easily for us to obtain.
3. Not enough information
4. Not getting updated on the changes until we get fined when an inspector comes in - not receiving information on changes either by email or mail. All licensees should be getting updated on changes that affect their license and regulations and it rarely happens.
5. Sends notices and that's it.

Weaknesses

Regulation & Legislation

External Stakeholder Comments (continued)

Communication (continued)

6. Lack of communication to the public. Regulations in words are good but regulations with pictures provide a better description
7. Uniform way to receive updates on law changes.
8. However, it is far too punitive and not "helpful" to those in this business. They are not treated with respect nor made a "part" of the process. I have seen this in the industry and at hearings how these people are not heard, ignored, singled out and fined heavily. You must make these rules very clear, updates should be Clear and the Reasons why should be stated, cause people to understand your decisions. WE all must work together in a much more positive way. Example; why can we no longer tint brows? I have never had one issues of harm or infection doing this and the general public is complaining about it often. There is no rhyme or reason to this change.
9. not informed

Conservative Laws

1. California is far too conservative With what it allows in the scope of practice
2. It needs to be more strict because bacteria and infections are serious. It needs to become more strict like the food industry.
3. Please, please, please DON'T let deregulation happen in this state
4. None. It needs to be strict
5. In addition to that, stricter laws.

Consistency

1. inconsistent
2. There should be more across the state's in agreement of procedures allowed.
3. The blind leading the blind ...

Consumer Protection/Interest Groups

1. Regulations effective Legislation poisoned by Self Serving "Special Interests" group constantly interfering with Board processes working for Chain Salons and Franchisee's financial interests via manipulations of Legislation.
2. the strengths have been stacking the board to support the strong lobbyist that serve the beauty industry.
3. focused only with private sector
4. Allowing Board members to work on behalf of Special Interests group at Board meetings undermining Licensee's rights to a non bias Licensing Board paid for by BBC Stakeholders.
5. Once again getting through the red tape of Bureaucracy seems to me a little ridiculous

Weaknesses

Regulation & Legislation

External Stakeholder Comments (continued)

Consumer Protection/Interest Groups (continued)

6. BBC likes to make rules and I do t. Relieve it's in the best interest of the public. It's to get \$\$\$
7. I feel that outside entities influence regulations to restrict licensees from doing certain services.
8. You are led by the lobbying group mentioned many times. regulation creates lower skill requirements and advantages the large corporations so they have a larger lower paid labor pool
9. When laws are written and presented by schools or other companies who will benefit financially from the outcome, we can't have fair legislation.
10. The board supports statues and adopts regulations to support itself, not the "Stakeholders".

Educational Institutions

1. Based on expertise, the BBC should has been in a position to report issues with a now closed school, because of that lack of authority, many students were forced out of school.
2. i feel that a lot of the rules and the way the board goes about things are not in the best interest of students who want to learn the trait.
3. I'd like to see the BBC to drive changes that would help both salon owners and stylists. Right now Cosmetologists must complete 1600 hours of training, but the majority don't gain enough experience or skill to get a salon job after graduating. The only winners are the beauty schools collecting tuition. Instead of having one license cover all services, having shorter training/licensing programs for specific specialties with more emphasis on demonstrated skill (for example, makeup, hairstyling, etc) might improve the skill of the students (good for them, salon owners and consumers) while lowering the financial burden. Schools should be better regulated to ensure their students are actually gaining the skills needed for employment. There are too many "test mills" that leave their students with little practical skill and huge student debt loads.

Effectiveness

1. There is no accountability
2. The process takes soooo long. The legislative process is not effective.
3. They don't seem very well informed re: the area of skincare.
4. They do little of it
5. Our board being Sunset is one of the worst things that happened. It was brought back for a reason. The BPPVSE (sorry if initials are out of order) in my opinion, made things worse not progressive. Before them, what was wrong with how things were going? All the board needed to do was to put into place a similar program.
6. time management...If told earlier about issues it could take alot less time

Weaknesses

Regulation & Legislation

External Stakeholder Comments (continued)

Excessive Regulations

1. Too many regulations that inhibit us from providing the most up to date and effective treatments. Because of lack of education and information the board tends to over reach for reasons to not allow or forbid the latest technologies as well as the basic techniques for clean health and wellness. For example, something as insignificant as the use of lancets all the way to the recent fight for the use of LED.
2. Sometime a rule will be made one year and easily removed the next. Which results in confusion. It takes so long to put rules in place and a signature to remove. When people have been fined one year and becoming a easy fix the next year. This is sometimes hard to deal with. It causes frustration.
3. Some of those regulations, policies and procedures make no practical sense.
4. Lack of support for us. There are many rules and laws that are unnecessary and hamper growth, development and profit. The BBC does nothing to try to change it or guide us on how to change it.
5. too much oversight!
6. I think some of the new rules that I have heard are absolutely ridiculous
7. I believe California is over regulated and really needs to revisit alot of the rules and regulation for cosmetologist as well as estheticians
8. regulation change frequently, lost the effectiveness
9. Make tinting legal
10. In California any cosmetologist can instruct. The Instructor License needs to come back; it was discontinued under Gov. Schwarzenegger as not needed. I was trained and passed my exam in 1974 only to loose that license several years later with this ruling. I am not seeing the outstanding stylist that I once did with better Instructors. Get back to basics.
11. Some regulations have changed, not necessararly, for a good reason.
12. over regurated.

Feedback/Inclusiveness

1. to create more inclusiveness for persons that would love to serve on the board for broader perspectives in the industry as it relates to rules and regulations.
2. collaboration with other organizations is non-existent. There are studies and efforts going on at the Federal and state level that you could benefit from.
3. More industry involvement and inclusion. A way to participate not in person.
4. We would like to offer more feedback before changes are made. One of these surveys could be sent to stylist and schools for future exam changes.
5. need to provide constituents more opportunities to voice opinions and concerns publicly
6. Not open minded. Archaic system
7. Board should take more of a proactive stance as opposed to a reactive one.

Weaknesses

Regulation & Legislation

External Stakeholder Comments (continued)

Feedback/Inclusiveness (continued)

8. I think that all school owners should play a part in any changes in regulations before they are made.
9. Cliqueish
10. Being reactive rather than proactive; outreach to more stakeholders BEFORE these issues become critical would help strengthen their positions.
11. We don't have enough information give to us to be allowed to vote and have a say as estheticians. Where can my voice be heard?
12. Also not sure if I can answer with any evidence to support it. It does not always seem as though the Board is as supportive of the rights for Esthetics and Cosmetology is it should be.
13. Video conferences would help to include all
14. The BBC makes their own rules. For instance I spent a year getting a change of statute the board did not want to happen. the OAL rules in my favor and the board completely ignored the ruling and do as they please. by getting the ruling in my favor riled the board so they took me to court on some bogus charge to teach me a lesson.
15. The laws are not agreed upon by the majority of the professionals.
16. I think you guys should hear barbers and cosmetologist from a trade perspective that way we can improve regulations and provide a safer trade to the public.

Laws & Regulations: Inspection and Enforcement

1. They need to updat the rules....they are outdated
2. Unclear/unreasonable guidelines at times
3. We rarely get notice when a sanitation rule goes into affect. We should get a colored flyer/notice in mail or email that really stands out of any new changes.
4. language used in rules are not clear enogh for everyone.
5. Some laws are too strict or misinterpretation led by confusing language.
6. The "rules" of how things are done for (sanitation and sterilization as an example) for electrologists needs to be changed. We're lumped in with hair dressers, when what we do is entirely different, especially when it comes to our equipment. I feel the guidelines for each should be different. Hope that makes sense.

Scope of Practice

1. California seems to be very behind in the advancements of technology and the scope of practice very limiting in regard to Legislation. Education and Growth are NEEDED
2. The board does not update/upgrade the SOP or education of the licensees in order to stay currant with public needs and safety
3. Unwilling to advance scope of practice for licensed individuals through further education.

Weaknesses

Regulation & Legislation

External Stakeholder Comments (continued)

Scope of Practice (continued)

4. The BBC needs to broaden the scope of practice for Estheticians. We should be exclusively the only license to perform lash extensions or body threading, just as an example. Makeup application should also be a regulated practice as well, whether it be through certification or licensing. Excessive training is not necessary, just a short and informative course that teaches the basics of makeup artistry, and sanitation of brushes and tools.
5. Does not allow esthetician's to perform certain services but allows cosmetologists without actual further education or that other states allows their estheticians to perform.
6. I also think that a cosmetologist shouldn't be able to do skin care as an Esthetician they only teach you about skin for a few days it's not enough time or information the esthetician course is 400 hrs three days not enough
7. There are services performed (eg. threading) that are not licensed and should be.
8. The state of CA has outdated policies for estheticians. The beauty industry is 16 billion dollar revenue generating industry and our rules and regs have not been updated to match other states in what we are allowed to perform... it's almost like prohibition. There are so many practitioners performing illegal services. This needs to be changed and our scope of practice needs to be updated.
9. We are over regulated in our scope of treatments, and it is harder for estheticians to run successful business using current technologies than in other states where estheticians have a broader scope of services.
10. The board puts additional restrictions on some rules, while allowing other things to go unregulated. Unlicensed lash artists? Nail techs doing lashes?? But yea, let's put more restrictions on Estheticians with a license and allows unlicensed individuals to work on the public! Cmon!
11. The California scope of practice for Estheticians is so limited that we're known as one of the strictest states in the country. Estheticians from other states use the CA BBC as an example of what happens when the scope is so limited that it actually HURTS your profession rather than allowing it to grow
12. I just wish we were able to do more under our license, like in other states. I think regulations in CA for estheticians are a little strict.
13. We are too restricted, not allowed to perform simple procedures like tinting eyebrows, I'm talking about depositing vegetable dye base not bleaching. In my years of career when we were allowed to tint, I was commonly fixing someone's eyebrows a colorist bleached and made too light or blotchy. Dermafiles. We get lots of tourists from surrounding states that are allowed to perform these simple procedures

Weaknesses

Regulation & Legislation

External Stakeholder Comments (continued)

Up-to-Date

1. Everything needs to be rewritten to meet a new standard for the times we live today.
2. Not updated with current science & technology
3. Has changed with time
4. Although, the rules and regulations should be revisited and updated on an ongoing basis.
5. I think that our industry is in trouble because the regulations have failed to stay current with the market. Also hair care companies have started selling professional products online that once required a license.
6. Need to update and include mobile services. The demand is there and it is still against the law to practice it.
7. I think you guys focus on the wrong things to regulate rather than educate providers and follow the trends and have safe environment
8. Need to update to be more in tune with current industry standards.
9. Lack of relevant knowledge of today's esthetics.
10. new technology review and adoption is non-existent. seems like everything is considered as a medical treatment, even the non-invasive procedures and modalities that have been used for 50 years.
11. The BBC needs to reevaluate all of the laws/regulations for CA. Many of them are outdated. The BBC should work extensively with licensed professionals to reevaluate and update laws/regulations.
12. Convincing Legislators to advance BBC priorities needing statutory authorizations or reforms.
13. At least you make an effort to do so. I have to give you credit for that. Times change and we must continue to update and make those changes.
14. Some regulations and procedures are ridiculous, and very outdated.
15. regulatory structure is weak and slow to adapt.
16. BBC should work with licensed professionals to reevaluate and update laws/regulations. CA needs to get with the times - many of the laws/regulations are outdated.
17. Slow to react to new problems and these can get out of hand by the time the BBC can do something.

BBC Board Members Comments

Addressing Issues/Reactive

1. The Board tends to be a little conservative.
2. Not proactive enough to the extent that BBC reacts to legislation more so than trying to get in front of an issue.
3. The Board loses sight of its mission when deciding on adopting certain regulations.

Weaknesses

Regulation & Legislation

BBC Board Members Comments (continued)

Addressing Issues/Reactive (continued)

4. Reactiveness in regards to industry changes. Need to be proactive in regards to where the industry is heading and ensure that process are in place.
5. Weak in legislation. Specifically, BBC is reactive. BBC should be out in front of it more.
6. Legislation is our weakness. There has been a lot of legislation attention in this industry. BBC staff has trying the best to stay on top of that. Approach to legation is more reactive then proactive.

Scope of Practice

1. Many makeup artists are not licensed. This is happening at makeup counters and people providing in-home services, thus difficult to regulate through inspections. Makeup is within the scope of practice of an esthetician. The consumer would have to be educated on the possible risk.
2. Regulations on braiding. People within the industry are providing additional services on top of braiding by incorporating other products and tools. The concern is that certain tools should not be used. The issue is consumer protection, thus how to regulate and improve by encompassing the current trend.
3. Balance technology regulations to reduce licensees from adopting certain business processes that allow them to go around BBC regulations. For example, mobile services including personal service becoming popular with the increasing use of technology and "apps". Licensee are going out to homes and providing in-home services. The issue is how BBC will create the balance of regulating the licensee when the services are being provided in consumer homes since BBC cannot inspect consumer homes.

BBC Management and Staff Comments

Complexity/Effectiveness

1. rules and regs should be less complicated and to the point.
2. Rules are to lengthy and difficult to follow. Inspectors cant agree on how to cite
3. the verbiage sometimes undermines the intent of the regs, regulation for new equipment that doesn't fall under any existing regs is delayed, there should be a broad reg that is fineable that covers endangering the health or safety of the consumer to address obvious risks that do not fall under other regs.
4. some new regs are dumb (new stuff labeled 'new')
5. Regs are very unclear, they need to be more to the point and understandable by all. There should be no misinterpretation when they are read.
6. ANGRY LICENSEES, AGRESSIVE FOR ALL OF SACRAMENTO'S MISTAKES, AND WEIRD REGULATIONS THAT MAKE NO SENSE.

Weaknesses

Regulation & Legislation

BBC Management and Staff Comments (continued)

Laws and Regulations Enforcement Procedure

1. Regulations are created to ensure safety, but often become "watered down" through internal policies & procedures, ideas on whether or not something will hold up in a hearing, reducing or dismissing violations for some and not for others, etc.
2. Biased, the Board doesn't always support the inspector when they provide evidence of wrong doing. If an owner with some community power fights back, even though they are wrong, the Board backs down.
3. Licensed individuals still find loop-holes in the process of regulations. Ex: clipper storage; on the regulations it states they must be stored in a clean environment... This is a vague statement, the licensed individuals still question if it should be in a closed clean labeled container. Some inspectors say yes, some say no. That's confusing.
4. Budget constraints to hinder following through with new regulations to hire staff.
5. Often times Regs are overlooked by Management, and licensee's are not disciplined for not following the regs.

Update

1. Antiquated scopes of practice.
2. adopting regulation slow
3. industry changes faster than regulation
4. Needed update to regulations are delayed due to lack of budget and staffing limitations.
5. changes to regs are slow, Board takes too long to approve new regs, Board can't make changes fast enough to keep up with changing industry, many of the new rules are unnecessary

Weaknesses

Licensing & Examination

External Stakeholder Comments

Continued Education

1. Effective for entry level positions and apprenticeships. However, without continuing education requirements and acknowledgement of certifications, your professionals cannot be taken seriously by the general public. Technology over the last 5 years in devices, ingredients and modalities has skyrocketed....and we're still left behind, essentially at the date that we graduated our educational programs. Continuing education and acknowledgement of advanced certifications are key to the forward and positive growth of our BBC licensees."
2. No re-testing required once license is obtained; fee collected yearly for license renewal.
3. everyone should have continuing education for safety regulations.
4. Dated techniques and should have multiple levels to achieve more consumer awareness about the service provider they attend. Should have continued education with continuing testing to achieve master Esthetician license
5. No continuing education classes are required. It would be nice to have different levels of licensing
6. Only two testing sites Sometimes takes a long time
7. The person that passes or fails... doesn't leave with a score. They don't know where they need to improve or how to focus their future education "
8. not enough assistance or any continuing education
9. The renewal of the license should be subject to a some kind of update education to make sure professionals get updated with regulations' changes and new trends in the field.
10. No continuing education needed for renewal. Doesn't ensure quality in our profession, just revenue for the state.
11. I believe that in order to renew your license you should have to submit proof of "CEs" or units of Continuing Education. That would hold people to a higher standard and encourage education. Required ongoing education means safer services!
12. Failure to require additional training for licensure
13. Lack of structure for continuing education protocol and certification.
14. No continuing education requirements!
15. I think there should be a requirement for continuing education hours. At least 1 - 4 hours every 3 years of continuing education.
16. This profession would be taken more seriously and have more respect if the BBC enforced CE credits to keep licenses valid.
17. Lack of continuous educational updates to licensees in a mandatory form.
18. We need to bring back Continuing Education for License Instructors, because schools are using Certs and more students are failing their exam. The California Cosmetology Association have classes for License Instructors to received credit yearly.

Weaknesses

Licensing & Examination

External Stakeholder Comments (continued)

Continued Education (continued)

19. I have not received any notifications regarding continuous education.?
20. No continues education credits Board isn't able to attend industry events and shows
21. The BBC needs to discuss the idea of continuing education for post graduate professionals. Many times, the services performed in salons and spas were not taught in schools, leaving the student unprepared and under qualified in their profession.
22. Where is the continuing education for all of these licensees who don't have a clue on the latest updates on the health and safety regulations.
23. Would prefer that state board requires continued education credits to renew license especially after 2nd renewal. This industry develops very fast and estheticians need to stay up to date and earn their keep
24. I feel there should be continuing education required simply because there are a lot of chemicals used at a lot of products that are being formulated and if the hairdresser has no idea how to use them how can they protect the client from harm
25. I wish I was notified more often of continuing education or changes.
26. the license holders are not reading the information - BBC should get some kind of test that license holders should occasionally take to stay abreast with the rules and regulations changes.
27. Require additional Continuing Education credits in order to renew licenses.
28. Continuing Education Requirements
29. required continuing education for renewal of licensees that includes a minimum number of hours in health and safety
30. If CEU's were required for licensure, we would have a higher standard, better educated electrologists and less injury to clients.
31. Continuing education credit for all who hold a Barbary or cosmetology license
32. Continuing education
33. I believe all licensees sould be required to take advanced and ongoing education to renew their license status.
34. All Licensees should have to have CEU hours to be able to renew their license.

Educational Institutions

1. The schools teaching are only teaching to take a state board exam. Not really preparing for the public in a salon
2. Could be more collaboration with schools for preperation
3. They have no positive program or communications with the barber school owners.
4. Schools teach to the test so I've noticed the new estheticians I interview are rarely ready for "prime time" and need to be trained fairly extensively.

Weaknesses

Licensing & Examination

External Stakeholder Comments (continued)

Educational Institutions (continued)

5. Every school is different that's a given but the bbc should have a default education material that answers to the exam even if we have to pay to access the information
6. I feel we need more of a streamlined curriculum that would be taught in every school, uniting the techniques, and thus uniting the trade
7. Text book must be provided by BBC directly not by individual author like Milady
8. When they come to us out of school they have virtually no practical skills. We have to teach them everything about cutting hair. There should be shorter intensive courses focused just on what the student wants to do, haircutting, manicures etc. The current system only benefits the cosmetology school owners who charge very high tuition. It inhibits entry into the field of cosmetology because potential students have neither the time or money to get licensed.
9. Also, school instructors interpret the regs differently. I know this because I have worked in many schools and see the instructor's lack of knowledge sends students out with misinformation.
10. higher education
11. Standardized education is not available for applicants or licensees.
12. schools do not teach back combing and up dues I feel when I hire someone right out of school I have to work right by there side there not even sure how to do perms and colors so I wonder what do they teach them
13. Curriculum in cosmetology schools not in line current trends and employer expectations. School curriculum have not changed because test for licensing have not changed. Employers expect students to have certain knowledge and skill and for that reason are less likely to provide on the job training.
14. The BBC should regulate the schools or at the very least oversee the quality and ethics of the schools
15. by not demanding the private beauty schools enlist professional educated instructors that provide a solid informative education the industry perpetuates the educational attitude cutting corners and cheating students. There must be proficiencies or "factors" that students must be able to understand to pass the state exam and be successful in the industry.

Examination: Accessibility

1. getting a test date can be difficult and lengthy for the student
2. need to have locations closer to the area, need to be able to contest results or make the process easier
3. Bring the exam to each city, by having representatives tour to help bring the industry more in tune with the board.

Weaknesses

Licensing & Examination

External Stakeholder Comments (continued)

Examination: Accessibility (continued)

4. more testing sites in California
5. Hearing from Students, waiting period to take the examination or the second appointment if they fail. The Professional out of town to receive the California License, what's the procedure?
6. It is hard as bricks to get in touch with someone on the phone to answer simple questions. Also, applicants for test dates should receive them sooner than later and all this can be streamed lines through technology.
7. Communication regarding testing is terrible.
8. Slow processing, loosing paperwork
9. Require too many hours for hair stylists Cost prohibitive for many due to this
10. The amount of hours needed to get licensed is absurd. This leads to abuse of cosmetology students who must spend an inordinate amount of time and money to get licensed.

Examination: Accessibility (Language)

1. In my opinion there was a language barrier with the people conducting the examination.
2. Not enough examination centers. People should not have to go out of town for examination.
3. I've been told by our Viet/English bilingual outreach coordinator that there are errors or lack of clarity in the Viet version of the exam.
4. Vietnamese reading tests are not easy to understand due to not very good translation
5. allowing individuals to take tests in foreign languages? this segment of industry causes the most problems. by allowing non english speakers to take tests, you are no empowering them, but you are isolating them for the rest of the industry and are enabling abusive employment situations where they cannot get out.
6. Caters to non English speakers. Dilutes work quality, And people are using fake ID
7. Also, allowing people to test in their own language may seem like a good idea and politically correct, but if someone can't read English, how are they supposed to read warnings, instructions for use and SDS information?
8. Providing licensing for illegal immigrants.

Examination Improvements

1. Every change there are less and less operations student's have to perform. And many schools only focus is just to teach the test procedures and then lack of knowledge in other areas.
2. Need to improve test for example cosmetologist no longer do manicure procedure yet this the most at risk service in salons due tools used during service sharp objects that can transfer diseases from client to client.

Weaknesses

Licensing & Examination

External Stakeholder Comments (continued)

Examination Improvements (continued)

3. no testing on color BASIC formulation nor basic everyday techniques ...for example...using foils for highlights which is a very frequent service.
4. In my opinion from the discussions I have had with individuals who have recently taken the state licensing exam it seems as though some should have not received their license. The examination should ensure the health and safety of the general public, and the current scoring system does not insure that.
5. Barber to easy compared to Cosmo. I think it should be as hard.
6. The administration is fine, we wish there was more emphasis on haircuts and particularly clipper cuts.
7. Practical exam
8. It literally seems like you don't need much more than a pulse to get a license. I am seeing extremely poor quality work from new techs out of school.
9. practical assessment does not measure enough assessment criteria
10. Examination can be more to present the skill and knowledge of ones profession. Some of the proctors seem to not care to be there to watch the examiners take their practical test.
11. Examinations are rushed and do not adequately demonstrate a persons ability to safely perform services. Furthermore, examiners will use personal bias to score applicants which results in a poor system that can allow unprepared students to become licensed and prepared professionals to be denied. The system is run like a business not an enforcement agency for public safety. While funds are necessary they should not be the primary goal of licensing.
12. For Cosmetology, too much emphasis on esoteric functions and too little emphasis on basic skills. Most newly licensed cosmetologists we interview don't have sufficient haircutting skills for us to hire. The beauty schools tend to train to the test.
13. There not fair in there written exam for Cosmo question and barber questions
14. The test has little to do with the actual work done or how to ensure the safety of the client.
15. I thing the practical and written should be a combined score. Most stylist aren't good test takers (that's why they are stylist)
16. The test itself is unclear
17. Lacks consistency
18. Examinations require students to answer incorrectly just to pass, so the test need to be reviewed by knowledgeable experts, but often they are reviewed by those who believe and teach misinformation. . It's a common problem in many states.
19. I don't feel the new test is as effective as the old one when the candidates had to be prepared for everything. Lets go back to 1986 when I got my instructors license. The test was more difficult. They could still do everything on a mannequin that they did back then, even a pedicure. There are plastic feet just like plastic hands.

Weaknesses

Licensing & Examination

External Stakeholder Comments (continued)

Examination Improvements (continued)

20. Multiple chemical procedures are done on one head, without shampooing. Simulated regrowth used to be 1/2 inch, to simulate the body's natural heat zone. Now, simulated regrowth is two whole inches? That doesn't simulate a real life situation at all. No shampoo bowls used at state board test? Applicants supply their own water? The simulated chemical procedures at state board are a joke now. Hand sanitizer is not the healthiest option as it strips your hands of the good bacteria that's on them, and it dries out your skin. Students have to supply their own water? What's up with that? Bring back the old test that actually mimicked a real life situation. What's up with black hair? No more Press & Curl services with the marcel irons and ovens? No more soft curl perms? Applicants don't need to be tested on black hair anymore? That's not right.
21. WE need more areas to be focused on
22. BBC is losing focus of Health and safety. Example - Highlighting with foil, when does the product ever touch the skin –never
23. Changing the Practical testing to often is confusing to students and instructors
24. The standard should be set by industries professionals, NOT some 3 third party like the NIC.

Examination: National Consistency

1. reciprocity for out of towners
2. Each state has its own set of rules, it would be much better to have an across-the-board standard so if a professional moves to a different state, his or her license would be valid and procedures would not have to be learned or "un-learned".
3. New changes that keep a transfer student from pre-app is bad. I can see not allowing out of state transfers but in state and course transfers being delayed from taking test is harmful to the student and their ability to work right away.,
4. We in the industry believe that there should be a National Standard in Licensing and Exams. Also, an easier process for reciprocity.
5. NIC

Examination: Outdated/Quality

1. Examination is behind the times. Not up to date for today's current technology and techniques.
2. Exams are out dated by over 10 years.
3. Computer are very old and questions are not as clear as they should be
4. Current tests are archaic
5. Out dated examiners not even knowing what they're looking at
6. Needs to be updated to current salon practices
7. Exams are outdated

Weaknesses

Licensing & Examination

External Stakeholder Comments (continued)

Examination: Outdated/Quality (continued)

8. Please update the licensing. No more use of silk/paper wraps as no one in the industry is doing that anymore. Make it more reflective of real salon subjects.
9. Exam for the license is so old and useless in real world. It should be updated to current trends and technologies
10. Looks at old equipment as a way to treat a problem in esthetics.
11. However, nurses and police officers are not even tested this harshly. The entire testing needs to be updated. As far as those who can not speak English I have seen too many with their licenses Not following the State Board rules such as the Asian population and not working under their license. Along the central coast its a mad house these people are moved around continually and You need to police this and do something about it. Thats a major issue with us traditional salons.
12. monies don't go back into the board to accommodate the need to hire inspectors and updating the exam to bring it to current industry standards.
13. Test not applicable for the industry
14. The exams are a joke - irrelevant to modern standards of proper esthetics.
15. completely irrelevant and dated testing. students are forced to study things that will never be applicable to an actual salon setting. update or remove the practical exam.
16. THE PRACTICAL EXAMINATION IS IN NO WAY A REALITY OF SALON PROCEDURES IN TODAYS WORLD ESPECIALLY IN CALIFORNIA.
17. The Esthetician exam is a bit unique. Are there any Estheticians on the Board?
18. It's starts with the examination of skills. The test to get a California license is incomplete.
19. The test is so easy a monkey could pass it. All the important skill areas have been removed. If you did that with other professions it would not be tolerated.
20. Maybe make the test harder so it's not easy to cheat
21. Sadly many graduate with just enough knowledge to pass the exam but not enough information on how to apply the lessons.
22. The weakness would be in the testing process.
23. The practical examination is lacking in client protection practices. It is too simple. The profession is following the lead of the Millennials. The licenses are being handed to them with little or no effort on the candidate.

Examination: Proctor

1. We are told they are not very nice there and come of intimidating. The students are nervous already they do not need to add to it.
2. Times the examiners are bullies and use intimidation tactics during the practical exam I have no issues with the written exam

Weaknesses

Licensing & Examination

External Stakeholder Comments (continued)

Examination: Proctor (continued)

3. Your proctors at the Los Angeles location need to retire ASAP. They've been there too long and their love for the profession died a long time ago. They have always been extremely rude and unprofessional to the candidates. It's already a stressful day for the students and their curt attitudes don't help the situation. Check your video tapes or listen to the recorded conversations.
4. Proctors have strong reputation for being biased/subjective when failing testers at state examinations. Pre-application process is convoluted -- why 7 day period for sending in app after reaching 75% of program completion? Seems arbitrary. Instructions for apps passed down internally, seriously lacking from the BBC side. 2-3 months to get exam scheduled/re-scheduled is very detrimental to graduate success.
5. The proctors do not grade the same. Last week a student forgot his clippers and the proctor passed the student without seeing the student cut hair. Not all proctors would do that as they should not.
6. Hearing that students are passing Boards even if they make major mistakes or talking. Should be a bit more strict while testing practical
7. The licensing exam is not thorough enough, and many participants are given "Passing" results, and ultimately, their licenses without exhibiting proper technique or execution. I have heard stories of recent licensees who passed their exams without completing entire portions of the exam, and that is extremely alarming.

Examination/Licensing: Requirements

1. There SHOULD be a braiding certificate, as well as a shampoo assistant license after 300 hrs in school.
2. Too many licenses are given out for the applicant because typically failed.
3. The licensing requirements are extremely out dated. Most of the exam practical section feels like from the 1970s and doesn't really resemble what esthetician are actually doing as employees or business owners as far as treatments and makeup go.
4. I think it's way too easy to get a license and there are tons of people working in our industry without one and it is not being enforced
5. Let the salon owner who makes a sizable investment in their business should be able to make a determination on who to hire. The BBC should require the beauty school graduate to spend a year working in a salon before they acquire a license to work on clients. This would prevent an overabundance of cosmetologists and help the salon owner select the correct prospect to employ. 500 hours in a school, one year in the salon.
6. utilizing the same folks or specific organizations that follow the path that the select leaders in the BBC are aligned with. dumbing down the exam and forcing the industry to test nationally.

Weaknesses

Licensing & Examination

External Stakeholder Comments (continued)

Examination/Licensing: Requirements (continued)

7. I still think written should be given at 1200.00 hrs. Then practical. Needs to be a test sight in San Diego so candidates don't have to travel so far.
8. The last change for cosmetology students taking the State Board exam was confusing to say the least. The additional changes one month later made it difficult to ensure student success. Minimizing the requirements for the exam takes away from the quality of professionals entering the business.
9. As stated making technical clipper cuts part of the licensing requirements would be beneficial to our ability to recruit more qualified candidates directly out of school.
10. It needs to be harder to receive licensing. That way more educated people are going out into our industry.
11. To examine current policies for examination starting with the NIC.
12. Licensure for the sake of simply getting someone a licensed. Not caring about how the education was achieved simply licensing for sake of "getting people out there licensed." Integrity is a lost character trait and BBC is not helping by not holding potential or current licensee's to the standards that have been implemented.

Instructor License

1. only listening to the "few" that have private agendas and want more money in there own pockets. Not protecting the consumers from bad practices. Due to lack of qualified instructors in the private school allowing the private sector to rob their students of both education and safety practices.
2. The glitch in the system is the lack of an Instructor's license. Many instructors today do not have the necessary training in presentation, classroom management and knowledge of the "Act" or "Rules and Regulations. A significant number have no clue as to who they should be teaching for the practical examination. Re -instating the instructor's license would give them a base to work from.
3. As I said in the previous answer. Instructor licensure should be brought back. There ate very few active actual Licensed Instructors in Calif. When we have persons that come from the salons to teach it is a nightmare for the students and the so called "teacher". I have said this for years. Becoming a licensed instructor was the hardest thing I have ever had to do, why it was removed was the worst thing BBC ever did in my opinion, and it shows in the quality of teacher. What ever happened to the requirements of the board ? The students wrre required at least 5 hours of theory per week...the teachers now, don't know how to teach a theory lesson. And who in a school is going to teach them? I can yell you that my 600 hours of teacher training was the best thing for me to become an instructor.
4. It's easy to get a license. The lack of educator licenses-anyone with a license can teach.
5. Certification for instructors

Weaknesses

Licensing & Examination

External Stakeholder Comments (continued)

Instructor License (continued)

6. I also feel the Instructor License should be brought back. Calif. Is the only state that doesn't require it, and it shoes in the instructors that have no training in HOW to teach. It takes a certain type to do this job.
7. The board also needs to review the return of instructor's licensing.

Licensing Process

1. We're not really aware of internal administration but the license renewal process is weak
2. As I said previously, the process to get licensed is onerous and discourages entry into the field.
3. BBC needs to work WITH the licensed professionals to set expectations, clear up any confusion, and help clarify certain laws and regulations before the licensed professional begins work. Working with licensed professionals BEFORE they start their business would be greatly beneficial, i.e., pre-opening inspections - by request.
4. The licensing process must remain strong, fair and correct. To lessen this process weakens the industry. It weakens the Board who's mission is to serve and protect the people.

Mannequin Model

1. HOW EVER, WHY ARE THEY TESTING ON DOLL HEADS???
2. No longer having live models doesn't seem practical
3. Practical exams done on a doll head are an insult to the profession and not a true display of how one works with a live client.
4. The examination is not done on live people for Esthetics and is not tested on skill. The only thing that is looked at is sanitation.
5. I think that there needs to be more real life domains
6. Must go back to using live models during the practical exam.
7. The candidates are testing on rubber, not humans. Where in a salon do professionals work on rubber?
8. I've been licensed for 14 years, so I tested on a live model. I think testing on mannequin heads is ridiculous.
9. I also believe that using doll heads is not an accurate portrayal of patron protection and sanitation. I actually think that the practical examination is more theatre than knowledge. I really think that the practical examination should be taken more serious
10. Bringing a live model should also be eliminated.
11. The practical test is too easy, and does not mimic real life. Dolls are used.
12. should be on real model
13. testing on visual skin analysis.
14. lack of emphasize on the safe practice training by testing on Manequinn head.

Weaknesses

Licensing & Examination

External Stakeholder Comments (continued)

Mannequin Model (continued)

15. Testing for your license horrible ! it's on a doll head and they change rules all the time so nerve racking! They can still be kind and test !

Scope of Practice

1. I just wish we were able to do more under our license. Like dermaplaining for example.
2. there is too much oversight. I would like to be able to do more with my license like needling and dermaplaning as long as I pass a certification or additional hours of education. I feel the need to constantly try and take away my ability to do my job because doctors want to move into my profession is a big issue. What I can do with my licence needs to be protected not limited.
3. Estheticians will perform peels, and this should be more thoroughly addressed.
4. Statutory scopes of practice fail to keep pace with industry trends. Perhaps more industry partnerships via advanced education and industry certifications could provide more nimbleness to recognize new trends?
5. There seems to be a sense of "read between the lines" with certain scopes of practice, the Board doesn't always give clear yes or no answers.

Tiered Levels

1. There should be additional levels of licensing that can be obtained through proof of additional hours of education that other states currently offer. Some states have designations such as "Master Esthetician" which broaden the scope of practice and allow those in this profession to the ability to earn additional income.
2. More levels

BBC Board Members Comments

Continuing Education

1. Currently, there is no requirement for continuing education. Some of the issues we encounter with licensees is they either forget regulations that are important for public safety or when new regulations are implemented, they are unaware. A continuing education requirement attached to the renewal of a license will help keep licensees informed of new regulations, but will also create other educational opportunities. We were recently presented with a bill that will make it mandatory for students to learn about sexual assault. New students are focused on getting their license. Continuing education requirements will allow licensees the opportunity to be educated about sexual assault, licensing requirements and other topics that will raise the standard of professionalism in our industry.

Weaknesses

Licensing & Examination

BBC Board Members Comments (continued)

Continuing Education (continued)

2. Lack of CE program. A lot of problems would be solved with a CE program. Educate on the usage of tools and equipment and their corresponding scope of practice. For example, needle to remove blemishes under the skin.

Exam

1. Examination allowing candidate to perform shaving with straight razor for the Barbering exam on mannequin head (previous performed on a live model) is a concern since minimum competency cannot be gauged and determined based on the usage a mannequin head since blood is one of the indicators of incompetency.
2. Verbal examination to replace written portion based on exemption for Disability.
3. Rented equipment issues, specifically with tripods. Ensure that the equipment being rented is in operable service.

Exam in Foreign Language

1. Low pass rate for Spanish written exam.
2. Failure rate for Spanish exam.
3. Spanish examination fail rate in the Hispanic community demonstrates a language barrier which is not believed to be the Board's fault or problem. After talking to many people in the Hispanic community, concluded that the issue may be that different regions have different language or forms of Spanish that is commonly spoken. In many regions the slang version of Spanish is being spoken versus the formal version of Spanish being used for the examination. Thus, the instructions cannot be read correctly. BBC should consider administrating the examination verbally which may increase the probability of passing it, if it is an option.
4. BBC attempting to address continued issue of low Spanish language examination rates since it seems to be lowest amongst all.
5. Low-pass rate for Latino exam takers. Trying to create an effective solution to the issue is hampered due to lack of ability and oversight of schools.

Issuing Licensing

1. Re-evaluate the amount of service hours to ensure that the students are qualified to start working. This needs to be a requirement in order to get an establishment license.
2. Schools are under the Private Postsecondary Bureau, making it difficult to ensure that the individual applying for the license is true and correct.
3. Software system, BreZE, outdated. There is no room for different features or processes that make sense. For example, no option for licensees who are not practicing and want to cancel their license. System upgrade would benefit the department in terms of efficiency

Weaknesses

Licensing & Examination

BBC Board Members Comments (continued)

Scope of Practice

1. Analyzing license types and creating different types of licensees.
2. License the usage of additional equipment.

BBC Management and Staff Comments

Apprentice Program

1. Apprentice program.

Continuing Education

1. "By only requiring renewal of an operators license which can be reissued forever in a lifelong career; does not provide the operator with the proper tools to be compliant with ongoing inspections. It has been suggested not only by the licensees themselves, but industry personnel; that the board should in fact require some sort of renew course covering regulations on every other renewal period.

Customer Service

1. Improve customer service on phones.
2. Providing a consistent experience for licensees calling the board.
3. many licensees don't understand license won't be renewed with outstanding fines

Educational Institutions

1. School oversight.

Exam

1. NIC exam looks at fewer services during exam. For example, removal of pedicure section.
2. Some candidates still seem confused about the information given to them about the exam process.
3. Consistency among examiners in grading.

Exam in Foreign Language

1. Spanish pass rates low (2)

Exam Proctors

1. National exam training.
2. Training national examiners.
3. Providing ongoing training to national examiners.

Weaknesses

Licensing & Examination

BBC Management and Staff Comments (continued)

Fraudulent Documents

1. Identifying fraudulent documents.

Licensing Process

1. Inconsistent
2. Still a large number of unlicensed people
3. Seems like there are often printing errors on licenses

Teamwork

1. Lack of Communication from Headquarters, noting the BreZE system when speaking with and advising the consumer. No supporting information or "team work" when it comes to communication

Weaknesses

Inspections

External Stakeholder Comments

Inspections: Citing

1. result in unnecessary fines
2. They come in and get into anything and even personal purses, they are too quick to judge and looking and seeking NOT TO BE HELPFUL but to fine and get money out of you. It makes State Board look dishonest and greedy. The goal is to be helpful not to treat people as criminals.
3. gave me a fine for something she never seen before... also wrong fine as well. I had regenerate and fined me for a needle.
4. Most violations center around health and safety, and are not severe threats, yet fines do little to correct the problem. BBC inspectors should be able to send licensees back to school instead of just a fine.
5. As a very sanitized stylist, I resent the nit picking especially when I'm interrupted while I'm working. Being fined over slight things is insulting and financially hurtful.
6. Just interested giving as many fines as possible
7. At times, seems like they must find something to write up before the leave. My belief is that some things should be warnings and they should not spend so much time disrupting flow of business
8. The inspectors don't know the rules and regulations and are often citing people based on opinion and not what's in writing.
9. Not every item in a covered box unopened needs to be labeled new. Obviously, if the box is unopened- it is NEW. We should not be fined for having not written this information.
10. The inspectors that look for petty small issues instead of looking at the overall safety of the salon.
11. They say they have to find something to write up on,
12. review of inspector citations before issuing fines
13. Some establishments seem to get away with so much more than others(ie: nail salons) while others are fined for leaving a cabinet 1/4 inch open.
14. I couldn't find one person at the BBC tell my why this will be cited next time they come in they were just as confused

Inspections: Education

1. provide education during inspections
2. But when there is an offense aiding in clarity what the offense is on and how to fix while visiting would help in not repeating same offense
3. They do not educate
4. There is no education... They just want to write tickets and don't care to help.
5. Educating the license holder and salon owner needs to be better as far as what is expected for the salon to pass inspection

Weaknesses

Inspections

External Stakeholder Comments (continued)

Inspections: Education (continued)

6. If establishments received a letter grade or an improvement plan, the industry would be forced to uphold and maintain certain standards.
7. There is a huge opportunity to educate better and enforce standards. The industry can be elevated.

Inspections: Effectiveness

1. Therefore there are a significant number of shops using MMA monomers and they are all getting away with that.
2. I think there is a weakness on regulating clean operating areas of all business establishments, I have seen facial steam units with waters seating in for months and not changed. The floors never sweep and instruments so dirty that is unveliable.
3. Nail salons are still providing wax services by nail technicians
4. I've been to many salons & nail shops which are filthy.
5. None....Get rid of the Lead Inspector who should have been fired during the first Manicuring disease Outbreak and the process of reorganization will begin. In the absence of the Board during the Sunset he put himself up as the Dictator of the BBC with Appointees in charge at the time of the Bureau. Overseeing appeals hearings with him acting as Judge and Jury with no legal or legitimate process in place for Licensee's and Idiot Appointee's running the Bureau at the time. All of that caused the Manicuring outbreaks with no inspections taking place as they should.
6. Spend too much time on unimportant things like labeling trash cans
7. Ive been to several establishments with clear violations.....not sure how they passed inspection
8. I HAVE EXPERIENCED SERIOUS VIOLATIONS IN NAIL FACILITIES.
9. Inspections do not take public safety into account
10. no follow up
11. In all establishments The individuals should be held responsible for their sole work area. Common work areas should be the responsibility of the establishment.
12. The only reason for you to exist is to insure the health and safety of the public. What you have become is a bureaucratic dictatorship to figure out ways to fine people in the industry for not following ridiculous made-up rules that have NOTHING to do with health and safety.
13. need more inspectors that speak Vietnamese to communicate with the majority Vietnamese nail salon workforce
14. They would be more effective if they worked with practioners instead of acting like the police.
15. The inspections are very random and unclear. They need to have a list of standards so we all know what to expect and it would be easier for them to give us points.

Weaknesses

Inspections

External Stakeholder Comments (continued)

Inspections: Effectiveness (continued)

16. Cancer causing formaldehyde is still being used with Brazilian blowout
17. That being said, I have also noticed that many times it is only an appearance. I see a lot of tools that are stored in autoclave bags but have obviously not been through an autoclave, tub jets sitting in disinfectant in a prominent location, but the jets never changed between customers, offers of callous removal with blades, etc. Guess the only way around this would be to come in as a customer.
18. There are much larger problems that the inspectors could be concentrating on if it wasn't human nature to continue to hit the same salon/spas over and over, writing them up, yet again for unmarked towel cabinets and qtips. Better time management would be spent actually inspecting all of the illegal establishments that are very obviously on every corner.
19. BBC needs to work WITH the licensed professionals to set expectations, clear up any confusion, and help clarify certain laws and regulations before the licensed professional begins work. Working with licensed professionals BEFORE they start their business would be greatly beneficial, i.e., pre-opening inspections - by request.
20. They give vague descriptions of rules for instance I sell Obagi Products where I work and was told I couldn't use the face wash, sunscreen and moisturizer because they are part of a medical line- I don't use Hydroquinone or Tretinoin in my treatment room it's beyond my scope of practice but the face wash, sunscreen and moisturizer are just like any other product over the counter...confusing!

Inspections: Unlicensed Activity

1. There are so many "licensed" individuals advertizing and performing services that we all know are ilegal for us to perform. It seems the BBC is not doing an effecient job inspecting these businesses.
2. too many unlicensed worker in salons and barber shops
3. Licenses are not visible & I have no clue who's license is who's in nail salons.
4. Lacks the ability to close unauthorized facilities.
5. The rind the spend in the salon
6. During salon inspections that all licenses are reviewed and double checked with photo I.D.

Frequency of Inspections

1. Unfortunately they do not come very often. That leads to Dali s and especially nail salons that are not clean.
2. I have not had direct experience with the BBC. I've been licensed and practicing since 1995 and have never been inspected.
3. The inspections are not often enough.
4. extended periods of time with no inspections of nail shops

Weaknesses

Inspections

External Stakeholder Comments (continued)

Frequency of Inspections (continued)

5. Need to do more inspections
6. in the three years I've been a part time teacher they have never visited the school I work at
7. Frequency
8. Not inspecting often enough
9. Not enough inspections
10. In my opinion all establishments should be inspected on a regular basis. Maybe place on a rotation.
11. Some salons slip through the cracks and are only inspected once every 5 years or more. This allows salon professionals to get lazy and although it's up to each professional what risks they take, the example set for newer stylists is not an ideal one and more importantly, the client's safety is sometimes jeopardized. I was at a previous salon for 8 years and the salon was only inspected twice (once when it was opened and a second about 5 years later.) My new salon suite is inspected more often and keeps all of us professionals up to date and operating like a salon should be.
12. You don't do them enough
13. In the past 4 years, I have not seen or heard of any shops local to me, being visited by an inspector. No one seems to be dealing with poor sanitation practices or the use of MMA monomers.
14. Not enough inspections and enforcement on pedi spas
15. Not enough inspections conducted
16. Not enough places get inspected that fail in the compliance dept. nail shops being number one.
17. Not enough visits to schools and salons
18. Not enough visits
19. There is no frequent inspection.
20. Too few at nail shops
21. While inspectors are a deterrent, I know of one salon that has not seen an inspector in 6 years. That unacceptable. However, inspectors should focus on violators and make return visits to make sure they are in compliance especially when cited.
22. Because inspections are so few and far between, some practitioners are not able to be prepared at all times.
23. Had no inspections for 5 years -- then 2 in 3 months.
24. Inspecting spaces that have consistently had 0 violations multiple times per year. Resources should be utilized to inspect more salons, not the same salons multiple times.
25. not enough
26. There are not enough inspection, usually once every three years or so and there is not much follow up.

Weaknesses

Inspections

External Stakeholder Comments (continued)

Frequency of Inspections (continued)

27. Not enough inspection with schools and salons making sure there in compliance with state board regulations
28. I do not see anyone inspecting establishments.
29. The BBC has not kept up with the number of salon/stylist license to do follow up.
30. My experience suggests that enforcement is nonexistent. I've been in the industry over 50 years, worked on and off over those years, still maintain my license and can state that in all those years I've or the shop I've been have only seen 5 to 6 visits by the board.
31. Need to inspect more salons
32. I believe there are unsafe practices going on in nail salons I have been to lately and I don't believe that anyone is inspecting salons on a regular basis.
33. It appears that not all salons or practices are inspected especially nail salons
34. Not enough inspections conducted
35. There are not enough strict conduct within shops that seems to be intimidated by the rules of the BBC nor are there a lot of inspectors to see what goes on in the salons.
36. Salons are not inspected on a regular basis to enforce the rules.
37. I think enforcement should be done often. As being a manager myself. I have seen first hand the carelessness of cleanliness, and the lashout from stylist and management not caring.
38. Not enough inspection to salons or not at all on some salons.
39. There are parts of the state they seem to never show up in.
40. Selective enforcement. I am part of a large franchise and we are inspected quite a bit. I've had people come to us after having run their own salons and they've said they never saw State Board at their businesses
41. NOT VISITING ENOUGH
42. Need to visit more often.
43. Need more inspections
44. more on site visit to establishments.
45. It makes sense the more people you had out there checking for violations the more money you would make seeing somebody once every three years is not very effective also rewarding salons that are truly clean and well ran
46. in Southern California an inspector rarely shows up to inspect. In my experience there are years between inspections.
47. Failure to inspect facilities to ensure compliance.
48. following up on establishments that have health issues consistently.
49. And all establishments should be regularly inspected, not just the easy targets.
50. Need to visit more frequently.
51. More frequent inspection, regarding service providers, employees and employers, space of services provided by salons. Should be more strict about the laws.

Weaknesses

Inspections

External Stakeholder Comments (continued)

Inspector Knowledge: Consistency (including Citing)

1. Inspectors are inconsistent. My experience has been they make assumptions and form opinions rather than looking at the big picture.
2. Inconsistency! One visit some things are overlooked the next time you get a fine. Some barge in on services some don't. Your presence is known but again not constant. Also very hard to speak with someone on the phone and get a true straight answer.
3. Rules and Regs seem to be unclear or subject to inspector's discretion
4. They all have a different opinion on what should be cited. There does not seem to be one standard
5. I could test 3 different inspectors inspecting the same salon and I truly believe they would have very different findings. Very subjective. I have had the experience on an inspector looking at electrical equipment and not knowing what they were looking at (i.e. is that a muscle contractor?) Didn't know the difference in a high-frequency and a galvanic.
6. First of all, not one of the inspectors in almost 38 yrs of mine in the industry have the Same book of violations or interpretations of our codes of enforcement. This makes it Very Difficult for us to know what is correct and current, when each inspector has a different take or view on the codes.
7. Inspectors are Not consistent
8. inconsistency in inspecting businesses equally. for what one business is cited, the other isn't, for an example.
9. Each inspector seems to have a different list of policies and interpretations of such. You can get one inspector who tells you something has to be labeled a certain way, then the next time you get another inspector who tells you the labeling is incorrect and you risk a fine.
10. inspectors seem to all have different rules in their heads.
11. There is no consistency in overall inspections.
12. Lack of consistency in inspections.
13. Inconsistencies of knowledge
14. Inconsistent in regularity
15. Too many times inspectors have their own interpretation of the rules and reg
16. inspections inconsistent between inspectors. Not enough training for inspectors
17. Write ups and miss communication between inspectors some say one thing and others say another
18. inconsistent with rules and regs
19. Inconsistent citations; one inspector in San Diego (for example) writes an esthetician up for something that the inspector in San Francisco (for example) does not.
20. All inspectors should follow objective protocols to bring consistency to inspections up-and-down the state.

Weaknesses

Inspections

External Stakeholder Comments (continued)

Inspector Knowledge: Consistency (including Citing) (continued)

21. The inspectors are not consistent. The rules keep changing and I'm not sure they are all up on them. The last time we had an inspector come, she came in as if she was the police flashing her badge.
22. It seems that opinions of evaluators can cause write ups...interpretation of rules are not all black and white.
23. Inspections are very inconsistent from inspectors. Some are logical and reasonable while others are very unreasonable. Salons that are clean and compliant seem to get inspected more often than filthy little nail salons.
24. Most all of the inspectors don't seem to be reading from the same book of codes. What one inspector sees as a violation, another one doesn't. Most of the inspectors seem to believe that their word is it, and the previous inspector was wrong. I haven't met an inspector in over 25 years that was from our industry, and that I believe is wrong! I understand that most of them are from other fields of inspection, if so, make continuing education about our industry mandatory. This will help BBC and us.
25. Incredibly inconsistent, inspectors have no understanding of the industry equipment or product. What one inspector would right up another might not due to lack of knowledge.
26. Inspections are worthless and inconsistent.
27. Inconsistencies between one inspector and another
28. Inspection staff need to be better trained to bring more consistency to inspections. BBC should exert more oversight over beauty schools and apprenticeship programs.
29. Inspectors vary wildly from region to region, perhaps citing one practitioner for a violation, while in a different region the practitioner gets a pass. I believe the inspectors should possess a license for the discipline they are inspecting. Often, the inspectors, and the Board for that matter, are completely clueless.

Inspector Knowledge: Level

1. BBC inspectors have not enough knowledge on many subjects on what they are inspecting. They are making poor decisions against licensees, without explanation of their acts towards licensees.
2. The people who come to establishments have no idea what we do. They just check off items on a list. Often not knowing what it is they are looking for. Causes unneeded stress to rule followers
3. No encourage knowledge of new rules and regs
4. It seems that none of the inspectors understand scope of practice
5. State Board inspectors are not trained as well as they should be. I understand inspectors have a law enforcement background but we really need them to be educated on our industry.

Weaknesses

Inspections

External Stakeholder Comments (continued)

Inspector Knowledge: Level (continued)

6. Too fussy if one or two "clean" or "new" labels are missing in an otherwise well maintained and compliant salon but totally ignore that there is a company blatantly tinting eyelashes in department stores.
7. Inspectors not being licensed professionals and not knowing what they're doing or really looking for.
8. Lastly, when trying to point out to the inspector that they incorrectly have written someone up, because they were too hasty running through the salon, they won't hear of it. When someone tries to bring it to your attention, you ignore us. Your Enforcement inspectors should be from our industry, or at least have continuing education about our industry so to better serve the BBC and us!
9. Some officers are not aware of the current laws and use their "authority" to frighten the licensee.
10. Inspectors don't always know the rules well enough.
11. Understanding the Electrology business and being able to enforce knowledgeably.
12. Need inspectors who know the beauty industry. It is hard for someone who comes from another industry to know what we do and why.
13. That inspectors have no spa/salon experience. They don't seek to educate.
14. do not know all the law or a lot about what estheticians do.
15. Poor education on the fields they are inspecting.
16. The enforcement officers make up their own regulations. They are not properly trained. Putting incompetent cosmetologists in the field under the guise of being proficient is not protecting the consumer. Meanwhile someone coming from another state or country gets turned away because they do not have a license. A license does not measure competence.
17. Inspectors often come from a law enforcement background with very little knowledge of the facilities and equipment they are inspecting. Additionally, they often have very little idea of what esthetics equipment is allowed and what it actually DOES (does it break the skin, does it cause muscle contraction, does it penetrate below the epidermis). It would not be hard to have inspectors go through some basic training on the equipment types so that they're informed.
18. It seems inspectors don't have universal knowledge of the scope of BBC. Enforcers are not licensed in field and have a misunderstanding of rules. Laws change but not timely notice or effective notice given to establishments.
19. Too many gray areas of the law. For example, I had items stored cleaning supplies in a separate area of our common kitchen but the inspector said items could not be stored in a cabinet in the kitchen. I could not find confirmation of the information given to me by the inspector. Inspectors should be more informed about issues they see, however, they are in need of support themselves and are doing the best they can.

Weaknesses

Inspections

External Stakeholder Comments (continued)

Inspector Knowledge: Level (continued)

20. Some inspectors don't seem to understand what to look for.
21. not trained well enough.
22. We need an open dialogue AND ESTHETICIAN REPRESENTATION ON THE BOARD. There are currently 9 members: 5 public with no real understanding of the industry (just like the inspectors), one (multi-generational) school owner, one barber, one hairdresser and one salon owner that happens to be the Governor's wife's stylist. There is no one on the board that understands the dynamics of your licensed estheticians.
23. The lack of knowledge of the laws by both inspector and the person being inspected.
24. We need someone who understands the field better. Maybe someone who has been in the field
25. There are no unity and sometimes lack of experience and knowledge what actually needs to be checked out. Many times they do not check whether or not person who displayed the license is not the actually person.

Inspector Professionalism

1. It seems as though, across the state, not all inspectors are on the same page. They do not all follow the same rules. Example: interrupting a service for the inspection
2. Tries to stop services on clients which is against protocol.
3. Most inspectors are not consumer friendly, lack important skills to manage the stress of this very sensitive interaction and BBC as not given them enough tools to cope with helping salons stay in compliance.
4. The inspector's are often rude and intimidating, unnecessarily.
5. Should notify salons before inspection, it's totally disruptive and disrespectful. Sould find a better way to make sure salons are compliant.
6. There is a lack of costumer service and professionalism, I believe that often the people who are enforcing are unaware of what they are enforcing, for example an officer may demand to speak to a cosmetologist when the client is needs to be rinsed.
7. Not all inspectors follow suit. Some are lenient and some let the power go to their heads. I have met both types and really just wish the inspections would be straight to the point - I don't need special treatment, nor do I want them to treat me in a disrespectful manner. Just evaluate my operation and let me know if any changes should be made.
8. The inspectors need to put the licensees at ease when they inspect the salon. There are salons that do not follow the rules & regs, have an animal in the salon. The dog is not a service dog.
9. The Board sends some of the nastiest people to to this job. They are not helpful during the inspection but rather condescending.
10. Not willing to listen to licensees if an issue arises, argumentative and rude to our clients

Weaknesses

Inspections

External Stakeholder Comments (continued)

Inspector Professionalism (continued)

11. Enforcement agents are rude.
12. The agents have demonstrated their Incompetency, ignorance, arrogance, and unprofessional attitudes numerous times. Agents do not have the right to barge in during a client's session, or demand to rifle through a professional's personal items (like a purse)! We are professionals, not criminals, and deserve to be treated with respect, dignity, and professionalism. Agents should make an appointment, so professional's income is not affected by obtrusive agents attitudes and behaviors!
13. Some of the enforcement act a little hard core or try to through authority around when it isn't necessary. Just do the job.
14. A bit too anal in their inspections - more like a prison enforcement.
15. Send enforcement agents are bullies
16. I heard of inspections while clients are in the room, this is unprofessional on all levels
17. Poor manners towards licensees. Confrontational attitude.
18. Are rude
19. Many are brash, rude, or blatantly step out of their bounds as Inspectors (forcing their way into treatment rooms where clients are receiving services, which is not allowed). Interrupting services while in progress.
20. Again, hard to say just depends on who is doing the inspections and what kind of mood they are in. I choose effective only because you guys are actually doing the inspections.
21. They are very rude, do not work with us to address the issue but to look important, the attitude is that they are better than us.
22. It often feels the those who come in for the inspection lack professionalism and are often putting clients at risk by demanding attention when a client has color on his her head.:
23. Based on what I hear, some inspectors are very knowledgeable and often cite for things they personally don't like.
24. Not willing to be patience, interferes with customers, rude and not willing to listen to licensee
25. They're disrespectful of professional equipment and supplies. These are items that each professional has personally paid for in order to generate an income (and tax revenue for the state), and the agents handle & "inspect" them roughly, with no concern for whether they damage, break, or contaminate supplies or equipment.
26. just make sure they are doing what is instructed and not add an attitude with it. You can do your job and be pleasant at the same time.
27. Too anal and more like a prison
28. Due to a lack of staffing and funding inspections do not respect the rights of the establishment owner.
29. rude inspectors.

Weaknesses

Inspections

External Stakeholder Comments (continued)

Inspector Professionalism (continued)

30. However, it borders on harassment and hostility between State Board and those this business due to some of these Inspectors.
31. No inspector should be able to interrupt or stop a service being performed to inspect.
32. new Inspectors and their intimidation.
33. inspections are used as ways to bully and intimidate the professional
34. improve communication and professionalism
35. They tend to treat licensees as criminals who are out to deceive or intentionally break regulation. I'd like to see Inspectors treat licensees more as partners in protecting public safety rather than acting as Police agents "looking for a reason to bust you". We are professionals and should be treated as such.
36. I have not seen an example of this to be true. I have only seen and heard of inspectors who are rude and behave as if they are out to wrote citations. How can I agree that this goal is true and being met based on those experiences.
37. people in salons are fearful of the "State Board" because they are usually unkind, unhelpful, and arrogant.
38. Hostility and not being helpful to your licensed technicians is going to create many future problems possible law suits to the State of California, this industry is getting tired of constant harassment and fines that are outrageous. The public suffers due to this. It also, gives you a very, very bad reputation. That is never a good thing.

Sanitation

1. Having been a client in nail salons; I have found some of them to not do proper sanitation. There seems to be multiple salons opening with very little sanitation practices being done. Utensils being place in a plastic zip-lock bag after a service without QUATS solution present.
2. Checking the use of MMA in salons. Sanitation of supplies used in pedicures.
3. Cleaniness, labeled and proactive MSDS sheets
4. need to inspect barber shops more for disinfection sanitation problems
5. My response is in reference to enforcement out in the businesses. Many sanitation areas are overlooked.
6. It also seems as though sanitation and disinfection of establishments are on the decline.
7. Such as lash and brow tinting, dermaplaning. Or they are not being sanitary such as nail techs using dirty implements.
8. Need to check nail salons for waxing and proper sanitation
9. Nit picking on labels for clean and dirty brushes
10. BBC needs to be more strict somehow like the food industry because infections and bacteria is no joke for human skin, nails, hair, and health. Also more inspectors need to be out in the areas to see what is going on.

Weaknesses

Inspections

External Stakeholder Comments (continued)

Sanitation (continued)

11. I have been in salons and nail shops that are filthy and seen tools that are not sanitized.
12. Again, back to cleanliness. Ensure that salons and spas follow the rules for sanitary conditions. That everyone who practices holds current licenses.

Unannounced Inspections

1. Surprise visits interfere with ability to earn income and create issues of invasion of privacy for clients .
2. Again , surprise visits create issues with privacy for clients. They are not done in a timely manner and clients become furious when appointments are interfered with due to surprise inspections
3. It's bad for our businesses when the inspectors show up unannounced in the middle of busy days. In other states they often book appointments to do inspections as to not disrupt business.
4. You only inspect and enforce when something bad happens. gone are the days when you could be expected at anytime. this had a strong impact on constant awareness of sanitary practice.
5. Coming in to place of business without an appointment creates issues with privacy for clients. I have lost clients due to this process. It creates a loss of income and is less effective than a process such as setting up an appointment and having the esthetician or cosmetologist pay for an inspection . That way the practioner gets more knowledge without threats and the BBC still makes money.

Quantity of Inspectors

1. There are not enough inspectors to enforce the laws
2. Not enough inspectors (6)
3. Need more Inspectors (3)
4. Not enough Inspectors out there randomly inspecting licensed/unlicensed establishments. More establishments should be shut down if not following consumer safety.
5. There are not enough inspectors to cover the large number of stablishment and have them visit salons in constant basis
6. There are not enough Inspectors for the state of California
7. Not enough reps to go around on weekends or during off hours.
8. More establishments than inspectors and poor budgets.
9. Insufficient resources to inspect all establishments regularly to keep bad establishments from re-violating.
10. Not enough inspectors for the state of California.
11. I feel there are not enough inspectors to adequately cover salons

Weaknesses

Inspections

External Stakeholder Comments (continued)

Quantity of Inspectors (continued)

12. Lack of inspectors. The current ratio of inspectors to establishments is the weakness resulting in illegal practices being performed. Consumer protection which is the umbrella of BBC is not being achieved.
13. There are not enough of them Too few inspectors
14. Not enough inspectors available to properly show a presence.
15. Not enough inspectors to monitor all the establishments
16. Not enough staff to inspect hair salons and/or enforce laws regarding unlicensed practitioners.
17. They're completely understaffed. 21 inspectors for the entire state of California is completely unrealistic. The low numbers of actual inspectors makes them rely on human instinct to inspect the same salons/spas over and over, rather than to move on to other locations that haven't been inspected and focus on the growing underground economy.
18. I know there are thousands of businesses that should be inspected and few inspectors. I don't think answering "very poor" is accurate because the inspectors are asked to do an impossible job considering the quantity of businesses to be inspected.
19. Sorry, you are understaffed
20. There are so many establishments in California that there are not enough inspectors to cover everything.
21. Need more inspections for nail salons.
22. NEED MORE ENFORCERS
23. Too many salons to see, the issues gets worse because no one inspect
24. not enough inspectors to make a difference, and the salons go right back doing illegal services
25. Again, not enough man power to crack down on all of the industry offenders.
26. Same problem as before. Not enough inspection/enforcement officers to affect the number of unlicensed providers.
27. Once again there are not enough inspectors
28. Lack of inspectors equals lack of inspections. need more inspectors overall
29. Limited resources
30. Again, not enough people employed by the BBC to effectively deal with the nail salons.
31. Additional inspectors
32. Hire more inspectors for individual salons.
33. I think you guys need to hire many more people to do code enforcement when you go into these salons and barber shops and nail salons.

Weaknesses

Inspections

External Stakeholder Comments (continued)

Quantity of Inspectors (continued)

34. More inspectors to investigate the dangers and cleanliness of salons can make the beauty industry become better
35. Not enough inspectors out there

BBC Board Members Comments

Hiring & Retaining Inspectors

1. Low inspector compensation and high turn-over. Job risks, on second or “follow-up” inspection visit, establishment owners or licensees are angry. On particular follow-up for major violations inspectors are assaulted.
2. Board spending on travel or inspectors spends hours traveling to establishments because licensees cannot afford to live in major areas where salons are concentrated.
3. Hiring inspectors within the industry.
4. Multi-lingual workforce and inspectors.

Inspection Frequency

1. The frequency establishments are being inspected. For example, new licensees and/or business owners should receive their first inspection within the first year of opening otherwise this leaves room for mistakes to happen and continue to happen creating risk to consumer. Violations are common ignorance which creates a risk to public before we can inspect and educate licensees.
2. Inspection frequency, emphasized the weakness is the quantity not quality. Establishments are being inspected in a frequency of about 6 years. Consumers are expecting a higher inspection frequency of inspections, they are unaware of reality.
3. Recently opened establishments are not inspected within the first year as required. Establishments operate for 2-3 years without receiving initial inspections.
4. Licensees have not been inspected in a very long time. When conducted, inspections are a surprise to many. If establishment owners and licensees interact with inspectors more often, then they would be more informed. For example, lash tints and other illegal products found in these establishments.

Inspector Training

1. Communication with non-English speaking licensees.
2. Training inspectors to prioritize major versus minor violations.
3. Some inspectors are unapproachable, picky about fines, and issue fines without explaining or educating. They do not communicate the message that their presence is for the safety of consumer.

Weaknesses

Inspections

BBC Board Members Comments (continued)

Inspector Training (continued)

4. Ensuring that the non-licensee owners and licensees (service providers) are present and demonstrate knowledge during the inspections.
5. Inconsistency amongst the different inspectors.

Quantity of Inspectors

1. Lack of inspectors for the amount of licensees, thus budget increase is needed to hire more inspectors.
2. Lack of inspectors.
3. Lack of inspectors. Board needs to find funding to hire more inspectors. Spoken to numbers of salon owners who been in service years without being inspected. When inspectors for both Barbering and Cosmetology were combined the workload increased.
4. Lack of inspectors. Although formerly there was 11 and now 22, it remains insufficient for the 700,000 licensees.
5. Lack of inspectors, around 22 inspectors for 600,000 licenses.
6. Lack of inspectors.
7. Lack of inspectors, thus inspections. There are a lot of people that may be breaking rules, but we have not caught them because of the lack of inspectors.
8. Severely understaffed. Inspectors cannot cover enough ground or inspect as much as needed.

BBC Management and Staff Comments

Follow-Up Inspections

1. follow up to the previous inspections

Inspector Performance

1. Inspectors should inspect more.
2. Inspector productivity – streamline inspection to cover more establishments in a shorter period will enable to be in the communities more.
3. Not enough performed.
4. Inspectors do not have enough power to shut down the salons, and their territories are too large, making them unable to inspect more salons.
5. All inspectors should be on the same page with the regulations.
6. Inspectors should use their time in establishments to educate licensees and consumers about the Board and how to gain and remain in compliance.

Weaknesses

Inspections

BBC Management and Staff Comments (continued)

Inspector Performance (conitnued)

7. Constant complaints from licensees and inspectors are the ones blamed for their mistakes and lack of follow through or tardiness.

Inspector Turn-Over

1. Wages of inspectors preventing some territories being filled.
2. Vacant inspection positions
3. Lack of inspectors, hard to fill vacancies.
4. Not enough inspectors in the field on a regular basis visiting salons and creating good relationships with the salons
5. Inspectors lack of backing from union and no one else cares. management has never taken it upon themselves to step up and see that the inspection position gets a pay raise.

Management of Inspectors

1. It's management that does not support or back-up the inspectors and do not follow up or follow through on LAWS/RULES/REGULATIONS. Inspectors need time management and oversight.
2. Training our inspectors to educate.
3. Lack of inspection manager over the inspectors. This would allow for improvement and oversight.
4. Management has no idea of the job and circumstances inspectors go through. Management goes on rides with the inspectors but have not actually ever done the job from beginning planning day, loading vehicle, driving, inspections, and end of the day reports. They limit the time of paper work, constantly put inspectors under pressure to perform but do not allow time to complete task with more accuracy.
5. More support and protection for the inspectors- who are the "enforcement & inspection" facilitators.
6. certain areas are not backed. the voice of the inspector is not heard Inspection results should never have gone to the office to be mailed out
7. The Board does not back up their inspectors when they have been accosted by operators and owners of establishments; instead, they disregard it.
8. Again most of it has to do with management giving the inspector more administrative work without the time. Usually some office person getting out of performing a simple task to the point of fold your inspection reports a certain way, staple this but don't staple that because I have to take it apart etc....
9. Don't have time have to go out in the field. But feed back should come from inspectors not from office people. Round Table with inspectors not negative opinionated management that do not listen to inspectors that actually do the job.

Weaknesses

Inspections

BBC Management and Staff Comments (continued)

Management of Inspectors (continued)

10. NO OPPORTUNITIES IN FIELD INSPECTIONS. WE GET TREATED LIKE THE STEP CHILDREN OR WORSE.
11. Management has so many list going that are given to inspectors that only creates more work for the inspectors. When an office is creating many lists, it shows that they do not have a formal education level to manage, all they are doing is creating more work that should be handled by an office person not in the field. There are many ways to simplify things electronically but this office does not know how to do this, instead they handed to the field inspectors to do because someone in the office does not want that task. Management does not provide proper equipment for the field so it creates more work but they do not give the inspectors enough time to complete task.

Staff

1. Staff need to think out-side of box, not so black and white.
2. Staffing amount, classification, training, consistency among inspectors, and supervision.

Technology

1. Need more technology. No more paper inspections reports.

Quantity of Inspectors

1. not enough inspectors, many shops have never been inspected
2. lack of Inspectors for all of the salons
3. aren't enough inspectors to adequately inspect all shops within a reasonable time frame, some shops go years without ever being inspected, inspectors tell licensees wrong information regarding rules, inspectors aren't friendly which causes bad relations with licensees
4. more inspections
5. can't regulate because not enough inspectors

Weaknesses

Enforcement

External Stakeholder Comments

Accessibility

1. To hard to get on the phone. Difficult to communicate with so it makes it hard to get help to follow the rules properly. I don't think it's right that we have virtually zero access to help, but are quick to be fined thousands of dollars for doing something that is considered wrong.

Board Presence

1. Don't know what they inforce. Never see any reports
2. Not enough presence. I feel if they were more present they would see th gross violations- especially salons running and profiting doing hair and skin and nails and more without licenses endangering the public and do things of high risk-

Cite & Fine: Education

1. To be effective they should focus on education at inspections. If a salon looks like they are focussed on safe and sanitary practice in their establishment they should be educated rather than cited on minor infractions like incorrect use of the clean vs new label, at least on the first offense.
2. Seems more like a way to make money off of fines rather than an educational inspection
3. They do not explain themselves when you appeal a initial fine. You can write pages and response is fine is up held. That makes you feel unheard- their response should be written that they have seen and read the evidence and explain why they still fined you. This is my experience from being an establishment
4. Would like to see more emphasis on educating stylists during visits instead of just writing tickets
5. They behave as if they are not interested in educating practioners, but in collecting fines.
6. In salon classes should be available to educate for compliance.
7. Enforcement and education are two different things. Trying to find a way to combine them both would be ideal. People are only worried about paying fines
8. Inspect to make money. They need to inspect to educate and update skill of licensees in order to protect public.
9. You have become extremely punitive and not helpful to us in this business. Outrageous fining, looking through peoples personal purses, to find something to fine. This creates hostility. We should be working together better than we are instead we are being treated as criminals by the inspectors and fined ridiculous amounts of money. Positive relationships are always the best relationships, working together in harmony not hostility.
10. Because an inspection caused "panic" rather than clear guidance and support, the board is not as effective at it could be.

Weaknesses

Enforcement

External Stakeholder Comments (continued)

Cite & Fine: Education (continued)

11. Education should be linked to violations. Instead of fines that clog the Attorney Generals Office with appeals replace with mandatory return to Schools for retraining at violators expense. Way more effective deterrent and inconvenience no one wants to return to School plus costs.

Cite & Fine: Effectiveness

1. Silly regulations! As an example one of our stylist received a citation for qutips marked clean that were not marked NEW!! Anyone would know if one were used.
2. Giving out citations for things that are in progress. Ex: towels are in process of being put into the washer and still getting a citation for the towels being open.
3. Having to find at least one thing wrong to write up when inspected.
4. also rewarding salons that are truly clean and well ran and don't always find a littlest stupidest violation ,you know they never walk away with none
5. fines for ridiculous things
6. The inspectors are also not licensed and get confused about what to cite & fine.
7. Same answer...they will always fine you if they are in the salon
8. This is a complete waste of their terribly understaffed resources, not only on the inspectors, but also on the Cite/Fine committee that has to use their time to review and determine as well.

Cite & Fine: Fine

1. The fines are too hefty. First time offenders should be warned and or retrained or small fine. Fines are very steep for small first infractions whether they are inadvertent or not.
2. The Quats. Fines are ridiculous. I've been told to use water instead of actual disinfectant to avoid a fine. That's just alienating us from you
3. They come across as being focussed on finding ways to produce revenue through fine collection.
4. Ridiculous fees for not marking something clean or dirty, when you can plainly see which one.

Consumer Protection

1. The only reason for you to exist is to insure the health and safety of the public. What you have become is a bureaucratic dictatorship to figure out ways to fine people in the industry for not following ridiculous made-up rules that have NOTHING to do with health and safety.

Weaknesses

Enforcement

External Stakeholder Comments (continued)

Consumer Protection (continued)

2. You are controlled by an outside lobbying group that has continually downgraded standards while presenting themselves to the profession as being their voice. they are a Trojan horse killing good employment opportunities from within.

Educational Institutions

1. The BBC does not enforce Cosmetology Schools thoroughly enough, because many students learn improper techniques that are not witnessed or caught during the licensing exam, but follow through with those licensees during their careers. More involvement from the BBC would help to ensure that training and tools are properly implemented.
2. No true supervision over schools.
3. I feel as though the Board has a bad view of the apprenticeship program. I do not wish to be included in this view. My program has a 100% pass rate of the State Board exam- all who have taken the Exam have received a professional license. Programs are still allowed to operate with horrible pass rates. I don't think the Board should be making decisions that effect all of us when some do not comply. I have only been asked once - this year- in another survey about the apprenticeship process and program and what my opinion for success is or any opinion for that matter. This seems funny to me , that the board is making decisions that affect my livelihood and have never asked for any opinion on apprenticeship. I have been a Sponsor since 2008. If the Board has a problem, why don't they ask the most successful programs for their opinions before making policy. Or trying to make policy. I also don't think that a school owner or previous school owner who sits on the Board should be voting on apprenticeship policy. We are their direct competition- seems very biased and a conflict of interest . I will be making this point to the Board shortly. Lastly, I don't really trust the Board concerning apprenticeship. I feel like any input is just to gather information and use it against apprenticeship. I don't even like filling out this survey, just for that reason. You have never asked me before, why now? What does the Board have up its sleeve concerning apprenticeship- that's what I'm thinking right now.
4. I don't know if BBC currently is trying to gain authority over schools.
5. It would benefit all licensees if the BBC had jurisdiction over the schools
6. I personally would like to be a part time inspector for the schools. This is where the training starts. The students as well as the instructors need to be held accountable for safety, sanitation, and disinfection. Small fines given to them would make an impact for later in their career. I know for a fact that teachers tell the students they do not need to disinfect their sheers, because it will ruin them. Just spray them. Is that really effective??? Maybe I need to get up to speed, but it has never hurt mine as long as I followed the proper instructions.
7. But not all the school follows the programmes.

Weaknesses

Enforcement

External Stakeholder Comments (continued)

Educational Institutions (continued)

8. i feel that schools are so focused on making sure the students pass the exams that they forget to teach the actual procedures and helpful tricks that we can use in the real world/salon. so in the end it feels like we are just in school to only pass state board and not really learn how to be a cosmetologist.
9. Exert more authority over beauty colleges to stop fraud by bad actors (e.g., selling of hours) by instituting a new enrollee registration program, and pulling the approval of schools caught defrauding their students. Seek sole statutory oversight over schools, removing incompetent BPPE entirely.
10. Also not checking into the schools who also teach those who are not legal in California
11. and fraudulent schools.
12. Running school illegally.
13. It would benefit all licensees if the BBC had jurisdiction over the schools

Effectiveness

1. inconsistencies in knowledge on what should/should not be approved
2. I feel like in our field they can be a little too strict. In other states estheticians can do much more.
3. I wish we could work a little harder on the nail salons and keeping them sanitary and making sure all license's are valid.
4. My one instance with enforcement went a bit poorly. I didn't sign the back of my paperwork. Instead of it being sent back or someone notifying me. It was held and I was fined. I felt this was negligence on BBC's part and a way to make money.
5. The weakness would be not following through as well as they should
6. what is the reason having enforcement when licensed people do not follow and breaking the law during weekend?
7. need greater scope in enforcement
8. I haven't seen any.....
9. They should enforce the rules on all beauty establishments regardless of ethnic back ground of individuals. If you are applying human touch to someone you should be licensed.
10. Identifying salons paying stylists illegally without benefits
11. Lack of enforcement.
12. I don't see basic regs being enforced. The violations are often blatant.
13. the self check sheets are being written by people who do not know how to interpret the regulations because they do not talk to licensees on an every day basis. You have to be simple, not try to over-compensate with a fancy sentence.

Weaknesses

Enforcement

External Stakeholder Comments (continued)

Lack of Strengths

1. I don't think there are any strengths.
2. I have not seen any strengths!
3. The board in itself, we need regulation.

Scope of Practice

1. Unlawful activities of unlicensed individuals are not enforced; i.e.; allowing manicurists to wax without issuing fine or pulling licenses. Ongoing and rampant in our industry and lowers the value and opinion of our industry. Most egregious area of unsanitary and illegal services.
2. Also lots of manucurists provide waxing services in nail salons in extremely unsanitary conditions"
3. Lots of estheticians perform services that are not within our scope of practice and get away with it such as lash and eyebrow tinting or dermaplaning and ultrasonic
4. They need to get online on find Estheticians who are using micro- needling and peels that are beyond their scope of practice they advertise online as well Vi Peel for example and Cosmetologist who use razor blades without a barbering license as well as nail salon horrible sanitation practices!
5. Enforcing the laws on people providing services without proper licensing i.e.: nail saloon and waxing, eyelash extensions,
6. The BBC doesn't regulate all establishments for procedures that are not within the scope of practice. Many salons and spas are operating and employing professionals that are not qualified to be performing the service they are administering. These establishments advertise on social media, Groupon, Yelp and so forth. Just this week, kcal 9 Los Angeles featured a segment on dermaplaning called, ""Razor Facials." Upon further investigation, the Esthetician that aired in the segment did not hold a medical practitioner license. Dermaplaning is not within the scope of practice for a California Esthetician yet she was able to freely advertise her spa on tv for the public . It is not fair that the BBC doesn't regulate their policies for everyone and the public is misinformed as to what they can receive by a professional they are trusting who is not qualified to service them.
7. I constantly see/hear about people operaring outside scope of practice,
8. There are literally of hundreds of Esthetician's in my area performing services that are not within scope of practice. No one seems to ever notice and the public is completely unaware, nor do they care! (I'm being serious)
9. Many establishments who are practicing outside of their scope
10. Many people are performing procedures that are not within the scope of their licensure. Such as lash and brow tinting, dermaplaning.

Weaknesses

Enforcement

External Stakeholder Comments (continued)

Staff

1. Understaffing, inconsistency, poor training
2. Fire the Lead Inspector Demand all the monies stolen by Gray Davis and Governors who followed from the Board illegally to pay States Bills.Demand exemption from State Hiring Freeze to hire new Lead Inspector and increase Staff of Inspectors to do Annual Inspections of all Licensed Establishments. Link City Business Licenses with Salon Licenses to Close violators.
3. Lack of manpower and enforcement.
4. NEED MORE ENFORCEMENT, WITH THE BACKGROUND TO ENFORCE
5. Limited staff and resources
6. Not enough people employed to enforce the nail salons.
7. Insufficient funding for adequate staff.
8. Having the staff to enforce the rules
9. you do not have enough staff to do the job adequately
10. The BBC determines the rules and regulations but then does not have enough man power to follow through with cracking down on offenders. In the end, technicians are doing procedures that the CA BBC has deemed illegal, making it difficult to convince "new" technicians what they are doing truly is illegal.
11. There are not enough enforcement officers to properly manage the number of personal service providers both licensed and unlicensed.

Unlicensed Activity

1. Not targeting the ones who advertise on social media who are and aren't licensed
2. Poor job of shutting down illegal establishments (non-licensed or performing illegal services)
3. What concerns me is the unlicensed establishments popping up all over my city. It's not fair that I pay my establishment and license fees and there are places that just open up for business with no license and then close up shop if they are caught. It undermines our professional license.
4. Not following through with actual presented proof of unlicensed activity
5. Inspectors do not search online or locally for unlicensed facilities (there are several in this region for sure). Manicurist shops are performing waxing and continue to advertise this right on their windows, and perform this service unlicensed and unchecked.
6. There are several people in our salon suites that do eyelash extensions and have been doing so for 2 years with no Esthetician license. These girls duck out every time BBC enforcers come by. Seems odd.
7. Not following up on unlicensed service providers publicizing services on social media
8. lack of enforcement for unlicensed activity (unlicensed establishments, mobile services, etc.

Weaknesses

Enforcement

External Stakeholder Comments (continued)

Unlicensed Activity (continued)

9. If there was a task force that actually helped prevent unlicensed service providers from doing business, it would be more effective.
10. I constantly see/hear about unlicensed service providers, etc yet they continue to operate without apparent consequence (most often see this with nail salons)
11. Licensing illegal immigrants.
12. Not doing enough to stop unlicensed operations or people from performing services without proper training and licenses.
13. business operating without an establishment license
14. Many unlicensed establishments escape enforcement.
15. business operating without an establishment license
16. Hear of people working illegally who are not fined
17. You do great with salons, yet it seems they are the only ones being inspected. How about those that are unlicensed and advertising on social media or Craigslist? How is that being enforced? If it is, I've never heard anything about it.
18. Nail salons, manicurists and estheticians practicing out of scope
19. Inspections on those without proper licensing.
20. No action taken against illegal immigrants practicing cosmetology.
21. Don't catch unlicensed salons operating everywhere putting public at risk
22. Hear of people working illegally who are not fined
23. Sometimes when tips are given about unlicensed practitioners, the BBC does not act.
24. We really need to crack down on those who are working without a license.
25. So many salons are practicing illegally , hiring unlicensed persons, for services like skin care treatment, waxing other services. Running school illegally.
26. Illegal practices performed in establishments because of lack of enforcement.
27. checking out the illegal salons

BBC Board Members Comments

Board Meetings

1. Televised Board meetings. Untelevised Board meetings attracted around 100 public members down to 2 public members which includes a lobbyist. Thus, the Board does not obtain the feedback it formerly obtained. Former attendees included schools.
2. Providing simultaneous translation of Board meetings.

Weaknesses

Enforcement

BBC Board Members Comments (continued)

Case Processing

1. Difficult to get rid of the bad players.
2. Consumer complaints take priority to initial establishment inspection.
3. High workload or larger geographical areas to oversee.

Citations

1. Follow-up to citation issued to licensees. For example, there was one particular case during an inspection in which fines were administered; however, the licensee never received correspondence from the Board until the license renewal arrived.

BBC Management and Staff Comments

Educational Institution Oversight

1. Need control over schools and apprentice programs.
2. Selling of hours cases. No regulations to enforce this through the schools. There are fraudulent documents. Nearly impossible to find the person.

Enforcement of Laws

1. Restrictions placed on some types of complaints, what can be enforced and what is not followed up on.
2. BBC doesn't seem to have a lot of power to actually enforce actions on individuals violating laws.
3. aren't enough inspectors to enforce laws, staff is often unclear of the laws themselves
4. Not sure I can describe a Strength. I find that the enforcement of the BBC Rules & Regulations are not as strong and "forceful" as it should be to protect the consumer
5. Enforcement does not "enforce" the Rules & Regulations effectively. A letter sent to the licensee is not enough to protect the consumer. Enforcement needs to be more strict regarding the rules and regulations, and put the burden on the licensee to follow them. Also, BBC needs more power to be able to shut down an establishment for repeated serious violations.
6. Aren't clear on Regs. and Act
7. With Social Media being a large factor in today's communications, just like Twitter and Facebook and Next Door Neighbor, there are licensed "professionals" that are advertising and working out of the scope of the license(s). Advertising mobile services when the BBC Rules & Regs do not allow. Because of the Social Media these types of services are being offered to the Consumer without any recourse from BBC when brought to their Enforcement Unit.

Weaknesses

Enforcement

BBC Management and Staff Comments (continued)

Processes/Procedures

1. Confidence in Qbrit reports.
2. Collections sending fines to Franchise Tax Board.
3. Effectively requesting action from DOI
4. very little follow through. not timely follow through. does not utilize DOI enough. the safety of the consumer should be paramount, many people do not care about fines, criminal action is necessary for some and is not taken. the intent of the rules and regs of protecting the consumer seems to be forgotten.
5. Assuming that licensees will look at a website or hear about changes from an owner of a shop is not a true representation of what happens.

Staff Resistant to Change

1. Staff will not change their way of thinking, too inside the box.
2. Staff resistant to change. Changing the way things are done to help licensees reach compliance instead of putting them out of business.
3. Staff resistant to change or improve
4. Change a hard sell to some staff.
5. lack of backing from the top management.. Disconnect between divisions and no one cares

Unlicensed Activity

1. Gaining compliance from unlicensed operators.
2. DA's office prosecuting unlicensed operators.
3. The enforcement process is stagnate/routine. Statutes limit the authority the Board has to pursue unlicensed activity. The DA's office has no desire to pick up non glamorous cases for prosecution. Analytical staff has no real desire to improve the enforcement education process.
4. The challenges prosecuting unlicensed establishment owners, unlicensed activity, and individuals who create and submit fraudulent documents are areas of weakness in enforcement.
5. still a problem with unlicensed activity, "free lance" people,

Weaknesses

Education

External Stakeholder Comments

Awareness

1. What education? How do you educate?
2. I don't think I have ever heard of the BBC offering education directly.
3. not sure we are educated from BBC. I get information by researching myself.
4. Not sure they provide any education.

Accessibility

1. Need more visibility and resources and access to information.
2. Virtually no way to communicate with the board to receive guidance, support and help.
3. Info not easily available
4. I am not sure how it informs us, it is quite difficult to find information on the website
5. When you have new laws it is not easy to find on website for peoples particular profession or hard to understand. And some laws may not apply to certain profession but spectrum is too broad.
6. Hard to obtain info
7. The website needs to be redesigned to make information easier to access
8. Website is TERRIBLE to navigate, which makes it even harder to look up answers to questions/about laws and regs.

Consumers

1. In order to ensure the welfare of the general public, it is suggested that the board try to market to the general public in such a manner that its laws and regulations are public knowledge. E.g. commercials on local television channels
2. More resources to educate CONSUMERS on the importance of licensing and how to report things to BBC
3. Consumers are not aware of inspections importance
4. Plus the public is unaware and/or unconcerned about the problem of unlicensed activities.
5. Not enough awareness to allow consumers to active participation on their rights
6. Better visual education to the consumer with regards to cleanliness and professional spas, especially nail salons are. Could there be visual grades posted like restaurants?
7. Need to keep the consumer posters in the establishments

Dissemination of New/Updated Information

1. New and updated information should be sent to all cosmos in the state and there should be proactive (none punitive) way to make sure techs have critical knowledge about health and safety.
2. If there is a change, it's not promoted well, or difficult to find information about.
3. communication some times it is hard to access information on computer and print out

Weaknesses

Education

External Stakeholder Comments (continued)

Dissemination of New/Updated Information (continued)

4. Have never been notified of changes. I went to website to seek out changes
5. I have not seen BBC's outreach in education. I would like to see more of that.
6. I'm not aware of any education through BBC- so maybe lack of information on this
7. More of the licensees need to know about the website contents.
8. As a licensee I am never notified about new rules and regulations or changes. Thank goodness I research on my own or I'd never know.
9. the older generation who are not proficient with computer won't be able to obtain the updated info. should send it also during renewal time
10. This is the first time in 27 years of having a license that I have seen any communication from the BBC other than to send in my money for renewing my license.
11. I see nothing coming out on any regular basis. most hairdressers are disengaged
12. There some establishments did not even report to BBC and I do not know how they will be updated to changes.
13. The on-line information is dated back to 2015/16, needs to be updated on a more regular basis. to my knowledge, the new practical exam information has not yet been posted for candidates to review before going to sit for their license.
14. the updates on the podcasts are poorly explained. do not match with the written practical instructions
15. In my 20 years as a licensed professional I have never received any education from the BBC nor I have been notified of any.
16. We don't get information about changes until it's already changed.
17. updating salons on what the changes in laws is vety weak. Need a better way to let salons know what the changes are in the expectations for inspection.
18. I guess it is posted every year. Should receive an email with wording that is easily understood
19. We never hear of anything in the form of education from you. We are all properly licensed and should receive information like that and we don't.
20. Would like to have updates from board
21. Getting information of changes to the salons and the schools in a timely manner
22. Updating the website forms and publications, so we can be compliant. Inspectors have current forms that website has not been updated. Ex. Approved textbook list.

Educational Institutions

1. Too many schools do not stay in compliance with state board regulations from building codes to sanitation requirements. Having eye wash stations and msds updated.for example.
2. I wish we could have more cutting and coloring practical classes in the schools.
3. Orange County education

Weaknesses

Education

External Stakeholder Comments (continued)

Educational Institutions (continued)

4. Need more education class for instructors to guide their students
5. They could be so much better if they were in charge of the schools. It is ludicrous that this is under a different department.
6. Teachers should be more strict with the students, attendance for written and practical should be mandatory
7. I would like to see more emails updating schools (as well as receiving information in the mail.)
8. Schools teach to the test. Licensees are grossly under educated after getting out of school
9. Education needs to be updated many of those things we are tested on are null and void. It does no good to pass someone and then allow them to work without a proper license. Cosmetologists are Independent contractors and should be fined as Individuals NOT the establishment. They have been trained in the rules, they desire to be independent they should be fined independently. This teaches them nothing then if they don't pay these fines their license should be suspended. Establishments can back you up by making sure their license is up to date. But if you just fine the Establishments the Independents get away with this kind of behavior and cause problems with the general public causing illness and they are not stopped. Punish the wrong doer not the Establishment.
10. I feel if they need to give more resources to school and educate the teachers at the schools so they know specifically what to teach in all areas including sanitation and safety as the approved text books are not specific for the state so giving the lesson plans and course materials to the schools they would do a better job getting the right information out there
11. Teaching to pass test not learn fundamentals of profession
12. Privatized schools are not being held accountable for low percentage of graduates.
13. The curriculum is FAR outdated
14. Some schools need more education in all areas
15. Wasn't aware that the BBC had anything to do with education

Effectiveness/Responsiveness

1. There is no follow up
2. Incomplete in regards to all of the standard services offered under the cosmetology umbrella
3. Actual BBC license holders should be board members. Only then can this improve.
4. the information not always based on facts.
5. I think it is overwhelming to read all the regs. It makes me hope I am getting things right by following other estheticians
6. not enough

Weaknesses

Education

External Stakeholder Comments (continued)

Effectiveness/Responsiveness (continued)

7. Yes there are changes for the good Of public, but not all people licensed are aware of those changes.

Estheticians

1. If it wasn't for a facebook group that is specific to California Estheticians, I wouldn't know what was happening in the state.
2. Still so many Estheticians do NOT know the scope of their practice.
3. Esthetic "education" is designed to just pass the state boards. Real Esthetic education is learned through certifications, and on the job training. Education needs to reflect the reality of today's esthetics.

Foreign Language

1. Lack or clarity or accuracy in the translations.
2. need to provide more educational videos in language on your website. website needs to have real translation - google translate is not accurate. translation that is provided in print materials needs to be double checked - we have found inaccurate translations"
3. There does not seem to be outreach to foreign workers and I also don't see much outreach from BBC in general. It is also extremely cumbersome to try to find basic info on the website.
4. Nor requiring English when training cosmetologists.
5. outreach so there can be preventative education. Hold community forums once or twice a year in Vietnamese communities where you may have trouble with communication and engage the community. Attend industry shows to provide updates. Work with schools to have inspector do talks with the students. If they hear directly from the BBC inspectors, it resonates with them.
6. There are people that speak different languages and we need pictures of regulations because not everyone understands.

Improvements

1. There is room for improvement
2. I think there should be more information, videos or classes available
3. Teaches how to pass state Board and that is about it
4. BBC CAN DO MORE TO EDUCATE, VIA TRADE SHOWS, INSTAGRAM, FACEBOOK
5. Circular letters come out every so often, but information in them is hard to find without searching through each letter individually.
6. They need to educate us better so we know what to do
7. CONVALUTED AND MOST TIMES CONFUSING. NOT CLEAR ENOUGH IN PLAN LANGUAGE.

Weaknesses

Education

External Stakeholder Comments (continued)

Improvements (continued)

8. Written directions are different than the video.....The perm is to be wrapped from the crown to the nape. Yet the video shows them wrapping the perm down THROUGH and including the nape.
9. you do not know how effective your outreach is, page views are not a quality indicator.
10. more collaboration with other governmental agencies; more statements about board position on controversial topics would answer many FAQs
11. Due to travel limitations placed upon BBC, less participation at trade shows and regional meetings.
12. The webinars are mindnumbing
13. Need to be more proactive in getting information
14. can be improved

Laws and Regulations

1. Don't have any experience, that I know of, with mandates, mission, or vision.
2. How do these laws get changed? I don't know a senator, so I don't feel that update of regulations will ever happen. If it wasn't for grassroots action that the California Estheticians Advocacy took against SB 247 and 296, I wouldn't know anything about what the future looks like.
3. They need to send out more specific info on regulation
4. They don't really encourage knowledge of rules and regulations
5. As a licensed Cosmetologist, I would appreciate an email to keep abreast of changes in requirements
6. I think that the board should update us via mail/email on law changes and current laws
7. Not providing up to date rules and regulations to the schools both private and state owned, and the consumers.
8. It's hard to find what's changed when reading through each rule and regulations. It would be excellent if a licensee would be notified of new laws via email as an opt-in, for instance an email could say - "Changes made to section 2, line 4-8" or something like that. That way, I would go directly to that section and read the updated regulations.
9. Here is where it's insufficient. The laws and regulations that are listed on your web page are incomplete. You need to post to Us on your web page the Same info that you give your inspection team, because there are discrepancies in your information.
10. It would be a great help to all if and when new rules and regulations are made, to send stakeholders an email notifying is of such new changes.
11. More education of what rules/ regs
12. law changes and education opportunities out to individual licensees.
13. I feel that you guys need to find a better way to reach out to the public about regulations.

Weaknesses

Education

External Stakeholder Comments (continued)

Laws and Regulations (continued)

14. Laws have changed and we don't find out until the inspector comes in and writes us up for it. We got one letter for one thing regarding labeling and did according to the letter but apparently it wasn't clear and we got fined anyway.
15. In my opinion many of the releases by the board are not written in clear, easy to assimilate language. There are so many regulations that are vague and left to interpretation. This also applies to inspections. Something that passes on one establishment may fail on another.
16. Not sure how to fix this problem. The wording of the laws and regulations can be very confusing. It would be great to have meetings (if possible) at least once a year that is only to discuss the changes that have happened and the regulations that need to be changed. The state board should have either an inspector run the meeting and have it as an informational session. Separate from the meetings where changes of regulations are made.
17. There is no way of knowing who even engages in new regulations or additional education by the BBC
18. Not enough information disseminated to each area of license to inform about potential changes to licensing which would allow individuals to voice their concerns or opinions of upcoming legislation prior to change of any law or regulation.
19. You have to go FIND information yourself on sanitation rules and changes. Rarely do we get the information sent to us in easy to understand format.
20. Don't recall every in 30 yrs ever being notified of new regulations. Am I missing something?
21. That simply is not true. I did not know we need to have ALL of our waste baskets covered or we had to keep perm rods in zip lock bags. Some of these petty rules do nothing to protect the consumer but do a lot to create havoc for the cosmetologist. Send out a newsletter once a year and let us know what is going on. Spend to the money you collect from us to help the profession.
22. I feel they need to go back to the 1967 rules for school 500 hair cuts and sets more colors and perms to be completed in school before they can be done
23. And also, there needs to be some sort of online tutorial to show practitioners exactly what is required, rather than the "legal" language provided in writing on the website.
24. Could improve the area of "new rule education"
25. Knowing ahead of time what is expected would be nice. Perhaps a yearly update to all cosmetologists on changes to the laws. Or send this information with the license renewal.
26. They don't care about educating you regarding new rules..just in fining and getting money

Specific Groups/Information Requests

1. Could be more effective in business and professional preparation for the work place.
2. Skills are what new professionals have trouble with.
3. I would like to see more pertaining to salon management

Weaknesses

Education

External Stakeholder Comments (continued)

Specific Groups/Information Requests (continued)

4. Maybe have some webinars on procedures for Schools and the application process. But not to many
5. There is still many illegal salons working on the public, there is no real education on how to avoid these shops or give clues on how to spot one
6. Most cosmetologist don't check the website. It's probably true for other areas under the jurisdiction of the board. I'm sure it is probably expensive but mail coming to the salons/homes would get our attention, even if it is simply a post card reminding us there is information on the website we need to be aware of.
7. Sanitation. With this new uTube generation, maybe videos should be created by the BBC to support weaknesses in the industry so that the licensee can view on an ongoing basis.
8. I don't know how to answer this. Because I go to EAC (Electrology Assoc. of California) meetings I get the up to date material. If I wasn't a member of EAC, I don't know what they send out to California Licensed Electrologists.

Scope of Practice

1. I would love to see easy to read interpretations of the regulations governing what each BBC license type is allowed or not allowed to do.
2. Doesn't appear that it's easy to find info about what is in scope. There have been instances where others have been fined for having machines that BBC says are within scope. Seems like inspectors may not be educated or kept up to date on what is within scope
3. Licensees are still confused about what is and is not "within scope". Data on the BBC website isn't user friendly or easy to locate. Licensees who are not making an effort to seek out changes in the laws are often kept in the dark because the BBC sends *zero* communication by mail to active license holders about regulatory changes and updates. If you want people to adhere to policy, you need to educate them, inform them, have it right out there where it can't be overlooked. Send letters to licensees throughout the year with updates.

Up-to-Date

1. Not up to date with current science & technology
2. The Board has not kept up with the market and industry, there is so much i can go on about
3. outdated practices
4. Bbc is stuck in 1950s!!!

Weaknesses

Education

BBC Board Members Comments

Budget Constraints

1. Budget constraints impacts staff's ability to conduct outreach. Quarterly Board meetings should not be the only opportunity that stakeholders have to communicate with Board.
2. Hampered by the lack of budget. Travel restrictions for traditional outreach. Increase usage of traditional media, for example providing outreach in a morning show or local media.
3. Travel band. Travel is necessary in order to accomplish Board's mission. However, traveling is allowed for DRC or board meetings, but limited for outreach.

Educating Stakeholders

1. Education of establishment owners who are not licensees. (BBC is one of few Boards/Bureau that does not require establishment owners to hold a license. For example, establishment owners who are cited claim ignorance "not knowing" and hands-off approach to the specific laws and regulations and state they are just owner of the establishment. Specifically, it seems that establishment owners believe that knowing the laws and regulations is the responsibility of the stylist.

Educational Institutions

1. Oversight of schools. For example, during DRC hearings students claim that they did not learn certain practices in school and it is hard to verify because BBC does not oversee schools. Another example is the unethical purchasing of hours by students. This is a conflict with BBC's examination for minimum competency since it assumes the candidate obtained knowledge. This may be the reason why there is constant repeating of violations, the lack of quality education or non-education (purchasing of hours) received.
2. The Board does not have control over schools or apprenticeship programs. School issues include the schools selling social security numbers, selling of hours, and teaching examination. Although the Board does set the curriculum, it currently does not provide detailed hours like it did before. The Board now provides batch of hours.
3. Board not having oversight over what BPPE oversees makes it difficult for BBC to be effective. The Board would be better off being able to educate and prepare licensees in terms of profession itself, not just the examination.
4. Some sort of oversight in some schools. A lot of apprentice programs seem to not have a clear understanding of what they need to succeed. Lot of schools are taking student's money and not adequately preparing them.
5. BBC has no authority to identify which schools are not doing the right things. For example, the pass rates are suspicious for certain schools and selling of hours a concern. This becomes a disservice to the industry and to the consumer who is the priority. BBC cannot properly protect consumers if licensees have not been properly trained. Although BBC does have enforcement process in place, it does not seem efficient to correct them through such process when issues could have been initially addressed.

Weaknesses

Education

BBC Board Members Comments (continued)

Reaching Consumers and Licensees

1. How to get the word out more, consumers do not know that can submit complaints.
2. How to reach the consumer.
3. It seems like the only opportunity Board interacts with licensees is during Board meetings or DRC hearings which is not the friendliest.

Social Media

1. Need to increase social media presence.
2. Although staff is helping managing social media platforms and emailing system, BBC may not have staff person dedicated to communication which leads to a lot of gaps. Communication is critical to keep licensees informed and website is not enough.
3. Synergy on our social media. Embed videos from YouTube to BBC Facebook.

Website

1. The website is not user friendly. It is difficult to navigate through, it should be kept simple. For example, it is difficult to check licensing status and using BreZE.

BBC Management and Staff Comments

Budget

1. Travel restrictions
2. Lack of funds
3. Budget
4. Budgetary constraints for allowing travel for outreach
5. Due to governor imposed travel restrictions, the outreach program is basically non existent

Educational Institutions

1. The schools do not provide an adequate education to their students preparing them for the realities of working within the industry; the students are left holding the bag.

Effectiveness

1. Need better communication to staff on hot issues.
2. Too busy so it falls to the waste side.
3. Again whomever in management is not listening to the inspectors about suggestion on the self check list. Management of whomever is writing this insist on writing it in a non simplistic way. WE ARE DEALING WITH PEOPLE WHO ENGLISH IS NOT THEIR FIRST LANGUAGE AND THEY DO NOT HAVE A VERY HIGH EDUCATION LEVEL.

Weaknesses

Education

BBC Management and Staff Comments (continued)

Effectiveness (continued)

4. licensees complain that they aren't educated on rules enough, not enough letters are mailed with updates, older generation not familiar with website and social media, not enough outreach opportunities, staff transfers calls instead of educating.
5. More Communication and Outreach to the public for all "types" Consumer, Licensees, candidates and students

Inspectors

1. As the inspectors are now encouraged to become helpful in this matter, by taking more time to review regs & changes, it slows down their inspection process. Ultimately there should be a better combination of education.

Social Media

1. Social Media - Board needs a more active social media presence. Someone dedicated to this activities, answering questions and searching discussions.
2. The Board's Social media is not be utilized for education.

Updates

1. Some of the new information is not easily found. Salon owners and candidates, along with school educators are still struggling on receiving updated information. Perhaps we need a different approach, or an easier method to inform the consumer of new regulations.
2. some people don't have access to or know how to use internet to get resources

Website

1. Common complaint is even though there is web site it is not easy to follow and not always up to date
2. No one knows about our website or where to find the information on it.

Appendix B – Opportunities and Threats

There are many factors that may impact the future direction of the professions. These opportunities and/or threats may be areas which the Board would like to capitalize on (opportunities) or mitigate (threats).

Stakeholders were asked to list potential opportunities and threats external to the Board that they felt could impact the profession and its regulatory role.

This appendix contains the qualitative data relating to the Board’s opportunities and threats collected during the focus group, interviews, and surveys.

The comments in this appendix are shown as provided by participants. Comments that appear similar or on a specific topic have been organized into categories. The comments have not been edited for grammar or punctuation in order to preserve the accuracy, feeling and/or meaning the participant intended when providing the comment.

Opportunities

Trends

External Stakeholder Comments

Communication and Technology

1. Information sharing with us from you might be most effective by way of ; Skype, Go to Meeting, or any other of those processes that are being used for online web classes that We All Use in our Industry.
2. There is no "weaknesses" box: more viet/English inspectors would be good.

Internships

1. There should be internships for manicurist to allow more access to the field. The current board and admin staff is the best I've EVER seen in over 20 years. I believe we will see the most progress than we'd had since the board's inception
2. Strengthen internship programs
3. Bring back "Junior Operator" program as an alternative to the problematic apprenticeship programs (which are poorly regulated by DAS).

Mobile Services

1. There are certainly opportunities to capitalize on mobile personal services in California. Trends are moving in this direction and I feel that the regulations are slow to catch on and it's hindering the growth opportunities in this area.
2. Mobile services are coming and people are doing it. Please come up with provisions, allow it, and regulate it.
3. Would like to see a permit for mobile estheticians.
4. Licenses allowed in more than one location or a small portable license. Mobile covered under same establishment license (if both mobile and in patient based)

Scope of Practice: Estheticians

1. Estheticians are willing to complete continued and advanced education and should be able to grow our scope of practice to keep up with other states.
2. There is an opportunity for BBC to update required hours and testing that would support the grander vision of standardizing a higher scope of practice for the whole United States. It would benefit BBC for the future of esthetics to support those of us who are recognizing the changes in our industry and educating on our own to advance ourselves to accommodate the expectations and needs of the clients we serve. BBC could help set the higher standards in curriculum and provide testing and regulations that fit today's industry.
3. Experienced Esthetician should be able to move into Master Esthetician- on the job training and actively working in field should count for hours.
4. Develop a medical esthetician license. It is needed, desired, and would add more revenue for BBC.

Opportunities

Trends

External Stakeholder Comments (continued)

Scope of Practice: Estheticians (continued)

5. Estheticians should be the only licensees working on skin. Continuing Education and Advanced Certifications being acknowledged are the only way to legitimize and advance our careers.
6. There must be an Esthetician on the Board of Barbering and Cosmetology as their perspective is different than the work place experience of the other categories.
7. You should get esthetician permission to do tinting, using lancet and not be so stuck back in time. Market is evolving so should be. Dermatologist don't want to treat skin- they want to do other lukerative procedures but we (esthetician) are so regulated and limited by you.
8. Cosmetologists shouldn't study or practice skincare and the Esthetician licensure should be extended to add on medical Esthetician licensing if desired. Other states have accomplished this safely and effectively.
9. Growth in Scope of Practice for Estheticians. The industry has changed and continues to grow.
10. The board should allow licensed Estheticians with proper training and certification to perform dermaplaning. Many other states allow this and dermaplaning has been proven a safe and effective mode of superficial exfoliation with proper training.
11. The esthetics scope should be broader , we should be able to perform more services on the skin than is allowed if proper training was given.
12. I feel that estheticians should be able to use microneedling techniques that ONLY affect the epidermis. As an electrologist, I should be able to use a lancet to help my clients with horrific ingrown hairs as I have been trained with needles and licensed. Esthetician should also be allowed to dermaplaning the epidermis. This is an amazing exfoliation tool that does not harm the dermis.
13. Allowing Estheticians to dermaplane and do lash/brow tinting after completing some sort of training/certification.
14. NEED TO ALLOW FOR EYELASH TINTING AND KERATIN LASH LIFT FOR NOT ONLY COSMO'S BUT ESTHETICIANS.
15. Recognize continuing education and allow Esthetician's to provide advanced treatments with proper training.
16. Expand the Esthetics allowed Scope of Services. Create a second tier of licensing (eg, "Master Esthetician") to encompass additional allowed services.

Scope of Practice

1. Expanding the scope of practice for licensed professionals
2. Please allow dermaplaning, which is safely and effectively used and regulated in other states as a manual superficial exfoliation and hair removal method.

Opportunities

Trends

External Stakeholder Comments (continued)

Scope of Practice (continued)

3. I think California electrologists should be able to use laser if we choose to learn how.
4. Instead of deregulating the barbering license, and removing make-up from curriculum patterns, they should encourage licensure. The make-up industry is growing substantially, therefore, the board needs to take this opportunity to properly regulate encumber all practitioner's.
5. Broaden the scope of practice so we can perform up to date procedures and make a living in this profession while being insured like true professionals.
6. I would love opportunity to provide more effective treatments to our clients, for example utilization of lancets, micro needling etc. I also love the idea of having that in some form of master aesthetics license .
7. We need to be allowed to do current services currently being performed by esthetician everywhere else in the country like here. Dermaplaning for example is a non invasive service that is extremely requested by consumers. Improper Waxing is more of a risk to consumers than dermaplaning. We need to have perhaps more advanced licensing for higher educated estheticians who can have more scope to do more advanced services like microneedling and dermaplaning.
8. create license for medical aspect of license for skin care and trichology specialist license for assisting hair transplant and irregularity of Hair lose condition.
9. I always am grateful when the BBC allows us to give feedback. Because our industry is always revolving in one way or another i do have a few recommendations in regards for improving our industry. I would very much like to see a new program for Hairstylist license only. Being involved in the School Education for many years I've come across many students who don't have interest in skincare, or nail-care. I would like to see a 1000 hour course geared just for those who want to strictly do hair only. Since we already have nail, and skin licenses only, i can see the benefits of moving forward in the future toward a Hairstylist license and, for those who want to learn and do hair, nail, and skin a Master Cosmetologist license. I strongly urge you to consider this area in future state board meetings. Thank You Linda Lamb
10. Need to regulate threaders and braiders. Will bring in more revenue and keep the public safer. People are shocked to learn threaders are not monitored.
11. waxing for manicurists
12. create a license for hairdressing only and bring hours to 1200 instead of 1600. majority of students only want hair.
13. More jobs/career
14. Officially recognizing Industry Certifications for advance training

Opportunities

Trends

External Stakeholder Comments (continued)

Scope of Practice (continued)

15. Allow for master training in lasers, and extractions. We could get a permanent make up and microblading license easily and it causes bleeding but we can not do extractions with a lancet? That's pathetic. Also, there are programs in Arizona that are intensive 2 week classes that allow for training on lasers and they are the same classes that RN's go to, why can't we?

Update

1. As an Esthetician, we need to be at the edge of technology, be able to keep up with our customers needs and demands, the days of European facial style are over, we want to be able to offer treatments that are safe but more advance with more gratification to our clientele.
2. Creative hair color continues to drive the industry.
3. There have been a great amount of new chemical discovered and developed in the past decade. There needs to be more education in understanding what these chemicals do, how they are made and long term effects on clients and society.
4. There are many new services that are not part of the cosmetology/barber protocol, but are performed in salons. Like extensions and it's different kinds, threading, tattoing including micro blading.
5. I think the Board needs to be updated on what's currently happening in the industry as far as Aesthetics is concerned and be current with all of the Technologies and modalities that are being used in other states.
6. Tinting and perming lashes everybody does it I see it being advertised in Instagram everyday! How!!!? Maybe it should be allowed Bc u can't police it.
7. Look to see what other states and nations are doing and copy them. That should not be so difficult. Put me in charge I'll fix it.
8. The public is now starting to understand beautiful skin is healthy skin. This ensures the public's safety in that people will be intentionally more healthy.
9. New machines and technology should be welcomed and changes and growth encouraged. adoption of new technologies - if a license holder is properly trained on modality, then they should be able to use it.

Opportunities

Trends

BBC Board Member Comments

Industry Shows

1. BBC participating in shows. There is no outreach on part of BBC or DCA. For example, shows like the Cosmetology and distributors shows in the state of California (Cosmo Prof., and San Jose Show) where 40-50 thousand hair dressers can be reached. Many Cosmetologists and establishment owners attend these shows. Take the opportunity to inform people about the rules and regulations since many people do not look them up. Hand in hand with inspectors, maybe they can inform. Educational handouts can be distributed at these shows.

BBC Management and Staff Comments

Communication & Technology

1. Media puts word out.
2. Move towards electronic training. Widely use (online training) public wants the information distributed in electronic format. Might make it easier to get funding/approval.
3. Social Media; owners and operators stay in contact with like minded industry professionals; the Board can capitalize on this.
4. younger generation familiar with webpage and social media can get more tips and resources

Industry Shows

1. The Board should be available to licensees at shows. Board staff should attend shows so that they are knowledgeable of new trends.

Opportunities

Stakeholders

External Stakeholder Comments

Board Members

1. The Board needs to have representation from all entities that it governs...Electrology is missing and has been for a long time.
2. Have an Esthetician on the board, and learn how esthetics are actually practiced today. CA Esthetician's govern each other, and want to cooperate with the BBC, but do NOT deserve to be treated like criminals!

Consumer Protection

1. It is crucial that client protection health and safety is always at the top of the list and this is definitely a strength of our board
2. Return to the original reason for existing...health and safety NOT to steal money from professionals who have become victims to your ridiculous rules and regulations that have NO rationale other than to steal money by way of made-up fines

Educational Institutions (including Instructors and Students)

1. The BBC should be supporting Cosmetology Schools more thoroughly. It would help to prevent future infractions and penalties to many licensees who would benefit from more informative training.
2. I was told that the BBC does not govern cosmetology and electrolysis schools....if this is correct, I really think that should be changed.
3. I would like to see the Board network with the school owners quarterly. I think the school owners should be more involved in the State Board.
4. I think there should be student fines in the schools. The students these days don't understand the importance of the rules & Regs. Small fines would make a huge impression on them for the future
5. Schooling teaches one what should be done
6. Hair extensions is a multi-billion dollar industry. I believe new stylists are entering the industry ill prepared to compete. Established stylist are learning this via channels that hurts instead of helping the industry. They're not being educated about damage from tension, the different type of maintenance they require nor choosing the correct hair to service the client. BBC needs to have a post beauty school specialized license and/or certification for extensions. California is far behind in continuing education for stylists which places us at a disadvantage. Paying for a license every two years is NOT enough. This should be implemented for lash extensions as well.
7. Education and licenses are key to keeping the beauty business professional.
8. allow individuals with licenses and proven track records to further their education and apply those skills to help and protect consumers.

Opportunities

Stakeholders

External Stakeholder Comments (continued)

Educational Institutions (including Instructors and Students) (continued)

9. More outreach Giving schools test scores so they can improve education for students BPPE doesn't work with BBC to raise standards, work with schools and protect students Allow Este students to perform straight razor shave with additional barber hours.
10. Enforce that ALL educators working in schools are required annual test

Establishment Owners

1. Require all salon owners to either hold a cosmo/barber license or a mandatory course of general salon operations before an establishment license is issued.

Inclusive: Stakeholders

1. To use every day behind the chair stylist to "police" salons, similar to how Italy "deputize" citizens to help out fighting crime. This could help gain ground on the lack of in salon inspections
2. to provide a collective inclusiveness to the industry not just looking at the Professional beauty federation as the industry . This organization represents the private monopolized sector which has been sought after as the only organization that knows what the beauty industry is about and that is supported with their lobbyist.
3. Rely more on industry experts.
4. Times have changed and there are all kinds of new things on the market and all of these we should be allowed to do/use. And I think there should be more part time job opportunities for us long time licensed to be inspectors seeing we have actually worked in the industry.

Legislator/Regulators

1. understanding local and federal rules and creat universal safty rules that is practical for evryday business.

Licensees

1. There are lots of opportunity for much better cohesion between State Board and the Cosmetologist ect.
2. Increase value and wages for American citizens by keepinf illegal aliens out of the cosmetology work force.
3. Mainly thinking of nail salons. I can see most I've been to are aware of the regs and have taken steps to appear to follow them.
4. There should be ongoing communication and constant reinforcement of expectations released to the licensees.

Opportunities

Stakeholders

External Stakeholder Comments (continued)

Licensees (continued)

5. I think there should be rewards to salons for no violations when surprise inspections happens.
6. Work with Salons in having strong work ethics, sanitation and safety of clients and Hairstylist

Manufactures

1. Using and educating product reps could be a huge benefit they know the good and bad salons, and could update

BBC Board Member Comments

Candidates

1. Students have demonstrated a good job in regards to sanitation when being shadowed at salon.

BBC Management and Staff Comments

Associations/Groups

1. Advocacy groups. Working with us to promote safe practices.
2. Healthy Nail Salon Program verifies compliance with BBC rules and regulations.
3. Supportive association groups assist with dissemination of information which helps Board identify trends.
4. Strong support from industry associations regarding the Board obtaining sole oversight of the schools and stopping licensure deregulation.

Companies

1. Kit company relationship. Talking to kit companies to better serve candidates when renting kits for exams.

Engaged Stakeholders

1. Increased industry participation - someone who is actively engaged with the industry through trade shows, social media, and industry associations.

Opportunities

Relationships

External Stakeholder Comments

Board Members

1. Public Board members need to visit salons and be exposed to salon training.

State Agencies

1. Working with other state agencies to facilitate greater compliance with labor, tax, insurance, Cal-OSHA laws, etc. Addressing the concerns of schools and salons operating legally.
2. Recognize the pressures on employee-based salons by spiking Workers' Comp and liability insurance rates, piece-rate wage mandates, etc. and avoid putting further pressure on such salons. Also, making a concerted effort to educate booth rental salons and establish MOU's with taxing and other employment related agencies to crack-down on illegal operations.

BBC Board Member Comments

Collaborative Relationships

1. Maintaining important alliance and collaborative relationship with the Medical Board of California. For example, in the matter of keeping licensed estheticians' on their scope of practice and overall keeping licensees informed on what they can do legally. Estheticians are getting fined for performing services that fall under the scope of practice of a medical practitioner. Specifically, informing licensees of what types of machines they can legally use, the type of services they are legally allowed to provide, and how they can avoid certain violations.
2. Collaborative relationship with the Labor Board to address the issue of Manicurists not getting paid fair wages and tips.

Insightful Relationships

1. Relationships with community colleges are strong.
2. Health and safety advisory council is not being fully utilized. The council is composed of about 15-20 members including stakeholders and Chemists who work for beauty product brands. The FDA and community groups are involved in this.

BBC Management and Staff Comments

Legislation

1. Legislative attention. Apprentice supervision. Bill drawing attention to program. Senator Nguyen connection.
2. Interest of legislators. Some like will work with us now as opposed to before.

Opportunities

Relationships

BBC Management and Staff Comments (continued)

Media

1. Media. Tend to have an interest in us so we can get the word out to consumers.
2. Media attention regarding barber shop. Educated consumers that BBC oversees Barbering and Cosmetology services.

State Agencies

1. Other state agencies wanting to impact the industry (EDD, DIR labor awareness, EDD enforcement).
2. Collaborative. New head of DOI and new Board members.

Threats

Trends

External Stakeholder Comments

Deregulation

1. Deregulation of barbers. would be harmful to current licensees and consumers
2. PLEASE DO NOT DEREGULATE BARBERING, OR ANY OTHER LICENSED PROFESSION ANY FURTHER!"
3. Deregulation
4. The biggest threat to the entire industry is the proposal of deregulation of licensing. This is outrageous to all of us who have come before and honed our craft. The fact that the states have dumped people into beauty schools just because they didn't know where else to give them training has been a disgrace.
5. Deregulation of sections within the beauty industry.
6. I have heard some states want to deregulate the industry. I am afraid of unlicensed unregulated people working on the public.
7. Legislation that may not require operators to be licensed by the Board.
8. I have read that some states are trying to do-away with professional salon licensing, not only would this jeopardize client safety but would also be a free-for-all mess for salon professionals. The BBC is a very important entity for both salon professionals and their clients.
9. Please keep an eye on any bills that might eliminate our licensing in the beauty industry. We love the beauty industry and want to keep it a professional license.
10. I am concerned about the senators attempting to get rid of the barbering license as well as giving manicurists the right to wax. There are far too many nail salons that do not practice safety and cleanliness let alone the proper way to (illegally) wax. We have separate licenses and training for a reason. Losing the barbering license just opens too many doors for non-licensed people to cut hair and use blades without sanitation or training. This would really hurt our industry as a whole.
11. the general topic of deregulation is a major threat to professionals and consumers.
12. Removal of licensing is a tremendous threat as it would prohibit protecto of consumers as well as beauty industry professionals.
13. I see the fact that reciprocity here in California and other states being So Difficult, is one of the reasons why Deregulation has been on the move throughout the USA. Behindthechair.com just did an article about it recently.
14. Deregulation would be a disservice to the public safety for any of the current positions requiring education and licensing.
15. The threats are that our license is in jeopardy. We cannot deregulate!! If we do it will take the industry back decades creating diseases, spreading lice, and creating havoc in our industry. We use blades and harsh chemicals that need education. If we deregulate there will be more people injured than ever before. Do not deregulate.

Threats

Trends

External Stakeholder Comments (continued)

Deregulation (continued)

16. Deregulating our industry is a mistake. We have a love-hate relationship with your inspectors, but we DO need them. It keeps our industry from getting a large black eye when if a member of the public is injured by a bad operator.
17. stupid senators trying to deregulate the licensing
18. They should never take licencing away.
19. Deregulation! With All the chemicals that are used in this field - with Micro-dermabrasion and chemical exfoliation Microcurrent they straightened it is crucial that the state bird keeps a handle on education in this arena
20. SB 247 is a HUGE threat. This bill makes absolutely no sense as it is written. Barbering is one of the oldest vocations and should be preserved so that the consumers can be protected from any unlicensed barber to avoid spread of disease, wounds from razor or shears, chemical applications, etc.
21. Really worried about the buzz that the state wants to get rid of licensing in the field of hair, skin, nails and makeup. This would endanger the public with so many people doing chemical services wrongly with potential harm and the spread of disesease without the proper training.
22. Deregulation; watering down of BBC authority through "voluntary" and questionable compliance programs, like Healthy Nail Salon; unlicensed activity; unfair competition; ignoring science when writing regulations.
23. Deregulations.
24. That any discrimination will not be tolerated and that it will result in suing the salon or salon owner and the salon owner (or salon as a whole) will have to pay a large compensation, and also a result in losing the license to practice any beauty service in the state of California
25. Deregulation of barbering and make-up licensure will increase consumer related injuries. From a licensee perspective the board is losing sight of its mission statement to protect the general public, and is on a pathway to deregulating all scopes of the cosmetology industry that it is sworn to protect. Licensure and regulations are imperative to the industry, and to consumer health and safety. With the short comings of the board the industry is falling suite.

Discrimination

1. Everyone should be allowed to work at a salon and not be judged based on; the color of the skin, ethnicity, sexual orientation, life style.

Threats

Trends

External Stakeholder Comments (continued)

Independent Contractor (Booth Model)

1. Employment laws that unduly pressure employee-based salons, providing perverse incentives to move to booth rental and/or go underground, entirely.
2. Our industry is threatened by competition that is masquerading as "independent contractors" while avoiding the expenses and regulations that employers must deal with.

Mobile Services

1. You know that separate license you are considering making for stylists to travel to hotels and do hair for weddings or people who are home-bound? You already don't have enough Inspectors to monitor the current license holders, so how in the world would you monitor people who are traveling to do hair? If we step back and look at the whole picture, one can see that it would be extra revenue in the State Board's pocket and that is the only reason to have that extra license. Don't bother with that one.
2. As a licensed Esthetician that focuses on makeup application, 95% of my competitors and peers are non-licensed technicians doing on-location services or working through phone applications that book them to show up to a client's home and apply makeup. I have personally witnessed the unsanitary conditions of their work.
3. Nail shops still failing esp. Low end. Also, there are work from home electrologists and aesthetician that use lancets, allow pets in reception areas.
4. People who work from homes
5. If not corrected/addressed, these issues jeopardize the entire licensure structure of our industry: Unregulated, Freelancing work outside licensed establishments. Places law-abiding salons at competitive disadvantage and places consumers at greater risks.

Scope of Practice

1. Estheticians should be the only licensees that work on skin. Cosmetologists do not have enough understanding from their minimal training to have the same level of responsibility as an esthetician does with clients. Inconsistency of Inspections must be addressed. We have no understanding or visibility of how these inspectors are trained so even the simplest of situations is written up and sent to cite & fine for final determination. This is a waste of time and deflects the inspectors from shutting down illegal businesses that threaten the public's health and safety.
2. Microblading and lash extensions to be governed more strongly. Also, nail tech should not be able to wax, unless a complete revision of training/education during schooling and added hours required to obtain a license to wax.
3. Using a medical board as a task force or advisors in deciding what estheticians can or cannot do.

Threats

Trends

External Stakeholder Comments (continued)

Scope of Practice (continued)

4. Seems like doctors now want to take over the Estheticians work, plastic surgeons do their job, MD should be in the cure of diseases and improving family health, let the Esthetician work the beauty enhancement on the normal population
5. The professions should be kept separate. Manicurists should not be waxing or doing facials. Hair stylists should not be waxing, doing nails or facials. The fields should be separate without crossover unless fully trained and licensed in each category of practice.
6. I have heard that manicurist may be able to wax. Not sure how true but I do not think a manicurist should wax, it should stay in the scope of Cosmetology and Esthetician
7. Please do not allow the licensing of manicurists to perform waxing on customers on any area of the body. The reason is I feel this is a safety concern to customers and the public. The majority of complaints for injury are from unlicensed manicurists performing waxing procedures on clients. Burns and infections are the most complained about injuries. I believe this brings public doubt about the ability of qualified and trained Estheticians who specialize in quality body waxing and hold great pride in providing sanitary and professional standards of our industry.
8. Nail technicians should not be allowed to provide hair removal it is not in their scope of practice
9. Dermatologist and Plastic Surgeons utilize the skills of an Esthetician but create boundaries that limit the scope of practice making financial readiness of the industry weak and unpredictable.
10. The board should not allow nail technicians to perform facial waxing services.
11. Fear of change or fear of handful of practitioners who are under educated and practicing outside of their scope of education
12. Not enforcing services within the scope of practice is harmful for consumers
13. Barbers and Cosmetologist should share the same license.
14. Nail tech's / salons, and cosmetologist should not be allowed to do hair removal, lashes, or esthetics at all! Their esthetic education is joke, and not on par with today's Esthetic protocols. It is dangerous for the public/ clients to have esthetic services done by untrained or poorly trained nail tech's or cosmetologist's. Esthetician's only do esthetic's because that's what we're trained & licensed to do competently. Nail tech's should be restricted to nails, and cosmetologist's should be restricted to hair (NOT inclusive of hair removal)! This would help protect consumers (public health & safety), and help education to be focused & relevant.
15. Manicurists being able to perform waxing.
16. Allowing the medical profession to further narrow the scope of Esthetician's for their benefit.

Threats

Trends

External Stakeholder Comments (continued)

Scope of Practice (continued)

17. ALLOWING THREADING AS A WAY OF HAIR REMOVAL BUT NOT REQUIRING A LICENSE TO DO SO IS UNFAIR TO THOSE OF US WHO HAVE SPENT THE TIME, MONEY AND ENERGY TO FOLLOW THE LAWS AND PROCEDURES SET FORTH BY THE STATE. THREADING IS HAIR REMOVAL AND CAN BE A HAZARD NOT TO MENTION UNSANITARY.
18. Allowing nail techs to offer waxing. Both of these practices would be harmful to current licensees and consumers
19. The medical community (derms and plastics) fighting to limit our scope of practice. While some areas are understandable (such as Botox or other injectables), there are other areas that make no sense i.e. microblading, microneedling, etc
20. If not corrected/addressed, these issues jeopardize the entire licensure structure of our industry: Salons providing services beyond licensed scope of practice.
21. Barbering services are more popular than they have ever been and are still on the rise in some markets in the state- The time/cost/procedure for obtaining a crossover license is difficult in this economy, therefore unlicensed practices are greater.
22. This underground economy not only undermines the legitimate attempts of BBC's licensees to ""make a living"" by underpricing services to unreasonable amount, but they also ""get away with"" many services that your BBC licensees cannot legally perform within the boundaries of our scope of practice.
23. Consumers call my office asking for a specific service that is not in scope. When I tell them I'm not able to perform, they move on to someone who will help them. Consumers do NOT understand we have boundaries. Consumers are completely oblivious to the fact that even such laws exist.

Update

1. Most of those new services are invasive and are at great risk for Clients' health. But aren't monitored by the board or have any way to find out what health procedures must be taken in consideration other than just a training and certificate given by a company.
2. If regulations in California does not catch up to technological advancements and trends in service demands, licensees and businesses will tend to move out of state where regulations and laws allow them to conduct the mobile services that they wish to pursue. This will certainly be a threat for BBC.
3. Also, lack of regulation within "cosmetics" industry regarding use of toxic ingredients which harm practitioner, consumer and environment. Availability of "safe" products is limited and education is limited in this area.
4. Newer safe technology should be approved for Aesthetician's all over the world people are getting great results from Aesthetician's. But not in California

Threats

Trends

External Stakeholder Comments (continued)

Unlicensed Activity

1. People doing hair extensions without a license and in homes
2. Us stylists are devastated by the BBC's lack of attention being given to the epidemic the unlicensed stylist working in the salon and at home. Why isn't there a hotline for this? Putting a stop to this places business and revenue back to the stylist and fines the perpetrators are forced to pay is revenue for the state. Also these people would be more inclined to attend cosmetology school which is also revenue being generated.
3. The idea of stylists not required to have a license to operate.
4. Lots of people working without establishment licenses. Working out of homes or in private offices that are not being checked by BBC. Need to find a way to pull up these people either by having them list a valid work location on license. I have people in my building who never get visited.
5. And I think you should crack down on people that are working in our industry without a valid license
6. Illegal aliens.
7. unlicensed, uneducated individuals working on the public..hair, threading, lashes, makeup with no knowledge of sanitation, blood borne pathogens etc working out of their homes, malls, department stores etc.
8. Illegally operated hair salons
9. I'm concerned with unlicensed activity and it's possible it is being exploited by the apprenticeship salons.
10. unlicensed activity
11. Not requiring licensing to operate as a "professional" reduces standards.
12. Unlicensed activity. Threading, waxing by manicure shops. Manicure shops utilizing one license for multiple operators because they look similar.
13. How thriving businesses can open and build clientele but not be licensed.
14. In some salons they let people work there even if they don't have a license or if they are illegal.
15. Sanctuary cities ignore federal law when providing opportunity for illegal aliens into the work force.

BBC Board Member Comments

Barrier to Profession

1. The Board creates a barrier for lower economic members of society to get into the industry. For example, the length of time to get license and available educational paths to get the licenses i.e. private education.

Threats

Trends

BBC Board Member Comments (continued)

Deregulation

1. New drive to deregulate everything.
2. Bill before BBC that purposes to do away Barbering being regulated.
3. A group of people wanting to remove makeup from BBC's oversight.
4. Deregulation of the BBC in general. Legislative people have in talks with in the Senate.
5. The trend of getting rid of licenses in general. The idea that this is an over regulated industry.

Education

1. Oversight of schools.
2. Lack of control over schools or apprentice programs. BBC can only deal with its licensees and cannot deal with the pipeline that creates the licensees.
3. Lack of control over the schools. Other states criticizing California for our licensees in term of reciprocity seems to become a problem.

Employee versus Independent Contractor (Booth Model)

1. Booth model trend becoming popular and slowly causing the salon model to phase out. This raises the debate between being an employee versus being a contractor "renting a booth". Leading to studios which contain co-ops where stylist can rent out spaces. Renting a suite is attractive since licensees do not have to manage employees; however, more education will be required when licensees become establishment owners. Licensees need to be educated in obtaining all appropriate business licensees. Booth rental trend is allowing licensees to be less accountable, thus licensees running away after an inspection with violations requiring corrective actions.
2. Licensees officially are 80% booth renters, but in many cases they are in-fact employees in disguise. Industry testifies this is a 9 billion dollar industry and not the appropriate amount of taxes revenues are being generated due to the income being unreported.
3. Mobile apps also leads to the booth model which raises concerns with independent contractor versus an employee rights. BBC needs to figure out the best way to implement regulation for the increasing number of licensees who are performing mobile services.

Mobile Services

1. Uber and similar companies that do not feel they need to be regulated and ignore regulations.
2. Trend of "apps" allowing license holders to perform service outside the brick and mortar. BBC is not going to be able to regulate what happens in homes, hotels, and office.

Threats

Trends

BBC Board Member Comments (continued)

Mobile Services (continued)

3. Urbanization of economy.
4. Mobile apps leading to mobile services and ensuring that BBC is preparing a strategy to regulate those types of activities that are being taken outside the establishments. It appears that salons will slowly become extinct due to the fact that many salon owners can no longer pay commission instead they have to pay hourly wages. This creates a heavy burden for salon owners by increasing overhead costs.

Political

1. Lot of legislation being presented in other states and a lot of national organizations that are trying to affect changes in Barbering and Cosmetology programs. For example, change is being pushed to change the amount of hours and operations. BBC should be proactive versus reactive to this issue. What other states are doing, can be consider both oppournity and threats.
2. Legislation solely written by lobbyists.

Saturated Market

1. Nail salon competition leading to lower prices and fudging of the rules. Saturated nail establishments which leads to lower prices and even prices that are lower than the price to disinfect tools and equipment.
2. The amount of licensees increases, thus the compensation decreases.

Scope of Practice

1. Trends and consumer demands influencing the scope of practice.
2. Fish pedicure is one of many new service trends in other countries which gets publicity, thus drives demand for unsafe and illegal services.
3. The possibility of more al carte training and licensing. Specific licenses or mix and match skill sets and licensing.
4. There is a lot of new technology; the medical field crosses the line. There are a lot of issues and instances where there are so many new electrical machines that have more of a medical purpose. For example, laser machine for fine line. The BBC needs to stay on top of the process and the machines that are becoming available and are being sold over the internet and being purchased and used by people who do not have any education with the machinery. It should be determined what harm the machine can do and what type of licensing is needed to operate it.

Threats

Trends

BBC Board Member Comments (continued)

Suppliers

1. Products that are sold in this industry are not regulated, including devices that can be categorized as medical devices, toxic, or hazardous like lash and brow tints. This impacts the health of consumers and workers. BBC is unaware of usage until the establishments are inspected.
2. BBC does not regulate the industries that sales to salons. For example, hair shows equipment is being sold to manicurist or Estheticians. Equipment includes sanitizers that look similar to microwaves, but are not legal because they do not disinfect. Also, salon sales to stores include hazardous things which we can improve safety if someone regulates the sales to salons. Pass simple law that no equipment can be sold to a person who cannot perform the duty under their scope of practice.

Working Underground

1. Amount of underground workers that are working without licenses and ensuring that BBC to stays on top of that and regulates it.

BBC Management and Staff Comments

Deregulation

1. Deregulation will leave us out of work and will be unsafe no consumer protection.
2. Legislation. Deregulation of Barbers and Make-up Artists.
3. Licensure deregulation

Examination Training

1. School training candidate by simulation. When examining candidate, they simulate instead of actually using product which causes deduction in scores.

Legislation

1. So many bills may affect BBC.
2. Legislature often proposes bills without knowing our practices.
3. Laws and regulations.
4. Legislative bills. Unrealistic expectations.

Mobile Services

1. BBC has very limited resources when it comes to licensee's working in a home, or going to other places that are not a licensed establishment (i.e. bridal parties, spa parties, photo shoots, etc

Threats

Trends

BBC Management and Staff Comments (continued)

Scope of Practice

1. Manufacturers selling items to licensees they know should not be used.
2. Practice of medicine. Vendors sell machines/products to licenses that are out of the scope of practice.
3. Fast changing Esthetic machinery. Laws and regulations do not address current consumer harm threats. Link between practice of medicine and BBC scopes blurred.
4. Threading is not licensed with the Board; however, I am seeing a disturbing trend of Threading being mixed with Facial and Cosmetology practices; Threading should be regulated. Threaders are stating that they think the industry should be regulated; they say that they are dirty, not sanitary, and that the business is growing, and will one day be a big problem.
5. unlicensed activity; rapid development of skin care machines; antiquated scope of practices.
6. freelance' aka unlicensed operators; "med spas" have licensees performing services outside their scope; dermablading becoming popular

Selling of Hours

1. Selling of hours by schools/programs. Candidates are unprepared when taking exams.
2. Selling of Hours. Licensees are not properly trained. BPPE.
3. Selling of hours is consumer harm to public. (BPPE)
4. BBC doesn't have any control schools (selling of hours)
5. School overnight (BBPE) selling of hours, student enrollment, and fraudulent documents (POT's).
6. Selling of hours create unsafe practices which leads to consumer harm. Not an even playing field.
7. Cases of apprentice program. Licenses are not properly trained.
8. Selling of school hours. (3)
9. not retaining sole school oversight (selling of school hours)

Unlicensed Activity

1. Also, limited resources when it comes to shutting down an establishment. If there is an unlicensed establishment with unlicensed operators, we inspect, send DOI and issue misdemeanor citation, the operators/owners continue to operate and the Board has no other way to shut them down. the Board needs to look into working with either the City/County, or police dept to shut them down and take the keys away.

Threats

Stakeholders

External Stakeholder Comments

Educational Institutions

1. They have made and will make in the future changes pertaining to schools barber schools with little or no input from the school owners
2. If not corrected/addressed, these issues jeopardize the entire licensure structure of our industry: Schools selling hours.
3. More practitioners are being driven underground because of lack training and understanding about our state laws..
4. Actually schooling should be more extensive and educational. Should be in line with current procedures. License shouldnt be so easy to obtain and you should require apprenticeship for every new esthetician
5. Why are there so many wet sets (200) to get through school. Maybe more haircuts, or thermals instead?
6. Schools are closing due to over regulation
7. Advancements in the Esthetic Industry could be harmful to consumers when they are only training for 600 hours.
8. We always have to deal with strict changes in regulations from agencies that in some way or another affects or in the future could impact the BBC. One way of reducing these kinds of threats would be in helping the schools when it comes to licensing future professionals. In some states like New York, after students complete their hours in a school the student can apply for a Temporary License that is valid for 6 months, then is surrendered and they are required to take their exam with the licensing board and pass it before the actual license. One of the many problems we see as a threat is unlicensed activity. Some do not take their test for fear of they will not make it in the industry so they go and work without a license first. If they are caught by an inspector, we pretty much know how it goes with the fine cost and waiting time to take their exam due to a poor choice they make. By moving in the direction of a temporary license mandate valid for 6 months, then surrendered, with requirement to take the exam would reduced the unlicensed activity. Developing a form that the schools can use to help students apply for a temporary license with a strict requirement of the salon location they will be at for 6 months along with a fee cost to the student is a big win for the BBC. Usually by then a student is more motivated to get their license and pass the test with confidence. Moving toward future goals is important. Thank you, Linda Lamb
9. I heard from manicurist who is Vietnamese who attended the class for some time but the school she attended fabricated that she attended classes and was able to take exam. And also many of them do not have manicurist license but somehow they are able to buy the license and work at salon without proper education which is hazardous to public health.

Threats

Stakeholders

External Stakeholder Comments (continued)

Establishment Owners

1. Salon owners who don't help assist employees to stay up to state board standards

Examination

1. NIC continuing to lead the education.
2. Low passage rates in certain segments viewed as the fault of the BBC

Licensees

1. Not fining Salon for every little thing, it doesn't make for a good relationship. Also which products out there are a hazard to the Stylists?
2. Enforcing laws regarding the use of MMA. Get test kits to check products. Cleaning of utensils to do nails and toes. Have seen the damage done.
3. The issue of shops not sterilizing is epidemic.
4. Not following rules and regulations. Procedure are look down upon. Convenient. Unsanitary
5. Unlicensed activity is allowed way too much and there are people who fail the test and continue to be hired and work which hurts those who are doing it right. The salons are at fault for hiring
6. Licensees moving out of state due to limitations.
7. The biggest threat to our industry and the thing that will impact the the working hairdresser the most is schools and the over abundance of cosmetologists. There is no enforcement of the underground industry licensed people think because they have a license they can practice in their garage or their kitchen. Rule need to be established that prevents someone from earning a license with the proper training. First establish a trainers license or a license that would be required to open a salon. it would be a slow process but it can be accomplished. There are certain services that cosmetologists perform that can cause bodily harm to consumers. These services should require a special license. Hair color, permanent waving, chemical straightening. There is a lot that can be done to make the industry more prosperous. Only 10% of the money collected for beauty services is being taxed it is basically an underground industry. We should have never let the booth rental concept take hold. It is going to be difficult to get the industry grounded. States who prohibit booth rental have a prosperous cosmetologists we need to look at what they are doing. California is the WORST in the nation
8. Not being able to communicate with our governing board means loads of chaos and confusion and practitioner performing out of scope. No updates that are inline with current trends in industry holds US all back from contributing to society and the economy in a professional manner.
9. I believe there are unsafe practices going on in nail salons I have been to lately.

Threats

Stakeholders

External Stakeholder Comments (continued)

Licensees (continued)

10. I have heard of cheaters taking the exams. And don't know anything about sanitation or contamination.
11. It seems that too many establishments are not adhering to laws and regulations.
12. Labor laws not being followed by many salon owners
13. Additionally, celebrity endorsements for inferior products produced by large corporations using toxic ingredients are marketed heavily. Usually target teens/women (largest consumers); small businesses suffer loss of business. Online purchases of "discounted" professional products hurt retail sales.

Licensees: Sanitation Standards

1. Many hair salons, barber shops have residue from several client services. Most have inadequate ventilation. Sanitation requirements are not followed. New professions are made fun of for applying universal precautions
2. I continue to have pedicures across California, mostly Asian shops and sanitation is nearly nonexistent.
3. NAIL SALONS ARE IN MY EXPERIENCE NOT MINDFUL OF RULES AND REGULATIONS. VERY FEW ARE TOP RATED FOR CLEANLINESS.
4. The fact that proper sanitation standards are not enforced is a huge problem. The sale of inferior, compromised product is a threat.
5. A continuous concern at nail and pedicure shops, sanitation, callous blades big factors
6. Pedicure salons that do not disinfect their implements.

Manufacturers

1. Manufacturers are not governed by a policing agency and the BBC makes no specific comment on devices or products therefore creating loopholes that place consumers in danger of receiving standardized services from licensed professionals
2. The threat of distributors and hair manufactures are selling professional grade chemicals online and have turned a blind eye. Also because the requirements for becoming a cosmetologist are being relaxed it is imperative that we demand better testing on patron protection and sanitation as well as as civics.
3. There is a huge problem with the proliferation of supply stores selling inexpensive, minimally labeled acrylic monomers that contain MMA.

Threats

Stakeholders

External Stakeholder Comments (continued)

Special Interest Groups

1. The second the nurses union discovers the opportunity to make money they will oppose any upgrades in practice. Increased education is not encouraged as a standard. It is all done after basic training.
2. We, here in California, do need a board and I hope we never see our board dissolved. We have to be careful about special interest and anything that erodes the board's integrity.
3. Special Interest Group claiming to be representing "all Stakeholders" when in fact they are only there to undermine the Board and work to benefit Investors of Franchise's and Chain Salons Owners who are financing there Horse and Pony Tent shows at the Capitol using innocent Students who don't know what's really going on. Franchise Salons and Chain Salons paying less than retail and Fast Food Businesses using skilled trained workers.
4. The continuation of control by outside lobbying group serving industry not the public.
5. Senators who have agendas which threaten our licensing and our livelihoods. The CA Medical Board who would prefer that Estheticians didn't even exist so they could have a monopoly on the beauty industry.
6. Frivolous legislative action from outside industry.
7. The current lobbying organization has over the last ten years carved away at public protection. Taking away teachers licences and dumbing down the test because unqualified teachers paid less were causing lower pass rates endangering government money. The solution was to not clean up the act of the schools but lower standards .Fred Jones and his crowd have used the profession as a money machine disadvantaging workers.

BBC Board Member Comments

Legislation

1. Legislation asking us to focus more on citing licensees, unless non-licensed establishment owners have demonstrated repeated negligence of the laws and regulations.

Licensee Knowledge

1. Licensees may not be maintaining knowledge in the profession since BBC does not have a continuing education. BBC only requires licensees to pay their dues every two years and does not require additional check-ins. Thus, BBC is unsure whether the licensees know the rules and regulations. BBC's only extension arm is the inspections; however, such are not reaching all licensees. CE component is a consumer protection matter.

Minimum Wage

1. Minimum wage and auxiliary benefits that come with that like health care.

Threats

Stakeholders

BBC Management and Staff Comments

Damaging Information

1. Misinformation being distributed. Lack of trust in Board and policies.
2. Negative industry representatives attending Board meetings with false accusations.
3. Media regarding consumer harm, workers right, and inspector practices negatively reflects on the Board.
4. Dismayed employees flood us with complaints that are not valid.
5. Loss of credibility through acts that the board can and cannot adequately enforce. This would include the purchasing of hours, cheating on exams, and unlicensed activity.

Educational Institutions

1. BBC is hugely lacking in control of the education that potential licensees are receiving from the "schools" it licenses. There is no longer a requirement for someone who teaches at a school, often leading to misinformation & false education being provided to our community of new licensees. The lack of involvement has led to fraud hours being reported in exchange for money and/or favors or services. And an even bigger impact is the theft of tuition fees. Although post secondary has a lot of jurisdiction over these schools, I believe that we should look at ways to pull together to make a greater impact on how these schools are run and insure proper education is being provided by them.

Threats

Relationships

External Stakeholder Comments

State Agencies

1. A comment. Maybe for the barber board it's not needed to have two organizations involved. Maybe BPPE or Consumers Affairs but not both

Sunset Review

1. Don't sunset the cosmetology license

BBC Board Member Comments

No comments provided

BBC Management and Staff Comments

NIC National Exam

1. NIC National Exam, terrible communication with us and lack of quality work.

District Attorney's Office

1. 7316 regulation. DA's office may be reluctant to prosecute unlicensed operators if money was not changed hands during undercover DOI investigation.
2. DA's office allows unlicensed activity to continue by not accepting enforcement cases/misdemeanor.
3. Cases not taken by DA.

State Agencies

1. BPPE not doing their job.

Union

1. Union organization and progressive discipline process preventing us from accountability or holding staff accountable.

Appendix C – Data Collection Method

Information for this survey was gathered by surveying external stakeholders, Board members, and Board staff using the following methods:

- ◆ Interviews conducted with Board members completed in May 2017.
 - Total of 7 responses from a population of 9 for 78%⁷ response rate.
- ◆ Focus group conducted with Board Executive Officer, Assistant Executive Officer, and management in May 2017.
 - Total of 7 participants from a population of 7 for 100% response rate.
- ◆ Online survey sent to Board staff (excluding focus group participants) in May 2017.
 - Total of 24 responses from a population of 82 for 29% response rate.
- ◆ Online survey sent to the Board’s stakeholders via several resources⁸ in May 2017.
 - Total of 530 responses from a sample size⁹ of 5,855 for 9% response rate.

The table below shows how external stakeholders identified themselves. The total shown below is higher than 530 responses because survey takers were permitted to select all categories that applied, thus the total percentage is greater than 100% due of the total number of multiple responses.

External Stakeholders Breakdown	Number	% ¹⁰ of Total
Barber	42	8%
Cosmetologist	230	43%
Electrologist	31	6%
Establishment	87	16%
Esthetician	234	44%
Manicurist	39	7%
Mobile Unit	8	2%
Other	86	16%
Apprenticeship Programs	5	
Educational Institutions	23	
Establishment Owners	5	
Instructors	31	
Other	22	

⁷ All response rates are rounded to the nearest one (whole number).

⁸ Apprenticeship sponsors, Board of Beauty and Cosmetology schools, Board of Beauty and Cosmetology Facebook, Twitter and Website, California Cosmetology Association, CA Esthetician Group, Electrology Association, Interested Parties List, Professional Beauty Federation of California, and Professional Beauty Association.

⁹ Sample size is an approximation.

¹⁰ All % of total figures are rounded to the nearest one (whole number).

Appendix D - Survey Data Reliability

Based on 348 external stakeholder survey responses in regards to Education, we can be 95% confident their opinions represent all California licensees¹¹ plus or minus 5%. For example, 48% of external stakeholders rated the Board's overall Education effectiveness as Poor or Very Poor. Based on the response rate, we can be 95% confident between 43% and 53% of external stakeholders would rate the Board' Education effectiveness the same way.¹²

To help improve data integrity, the online survey did not provide a neutral option when asking about overall effectiveness. Instead, stakeholders completing the survey chose between a positive choice (excellent or good) and a negative choice (poor or very poor). This allows the Board to better understand whether stakeholders have a positive or negative view of the Board in various areas.

Notes

¹¹ Total licensee population size of 602,637.

¹² Source: <http://www.surveysystem.com/sscalc.htm>



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