

**TITLE 16. BOARD OF BARBERING AND COSMETOLOGY
DEPARTMENT OF CONSUMER AFFAIRS**

INITIAL STATEMENT OF REASONS

Hearing Date: No hearing scheduled.

Subject Matter of Proposed Regulations: Pre-Apprentice Training

Section Affected: Section 917 of Title 16 of the California Code of Regulations (CCR)

Background and Statement of the Problem:

The Board of Barbering and Cosmetology (Board) licenses, regulates, and investigates complaints against barbers, cosmetologists, manicurists, estheticians, hairstylists, electrologists, barber apprentices, cosmetology apprentices, electrology apprentices, and the establishments where they work in California, totaling over 58,000 establishments and over 581,000 individuals. It is the Board's duty to enforce and administer the Barbering and Cosmetology Act (Chapter 10 (commencing with section 7300) of Division 3 of the Business and Professions Code (BPC)) (Act). The Board is authorized to establish necessary rules and regulations for the enforcement of the Act and the laws subject to its jurisdiction. (BPC § 7312.)

Existing law gives the Board joint oversight over apprenticeship program sponsors along with the Division of Apprenticeship Standards (DAS) and Local Education Agency (LEA) (BPC section 7333). Program sponsors act as the school and point of contact for apprentices and provide related training classes for apprentices both prior to being licensed as an apprentice and during their apprenticeship program. Prior to 2022, the Act and the Board's accompanying regulation at CCR 917 provided that in addition to meeting other requirements, to become a licensed apprentice, applicants had to complete a minimum of 39 hours of pre-apprentice training in a facility approved by the Board prior to serving the general public. (BPC §§ 7334(c) and (d), as enacted by Stats. 2003, Ch. 788 (SB 362), and existing CCR section 917.)

In the Board's 2018 Sunset Review report, it was noted that problems existed for those attempting to obtain the required pre-apprentice training at schools and the Board proposed statutory changes to this current requirement to allow the Board the option to develop its own online training, as follows:

The Board has been informed that various apprentices are being required to take the apprentice training more than once (for example: if an apprentice changes a sponsor). This requires an individual to pay money, often a significant amount, multiple times prior to obtaining their scope of practice license. This change will require that training (which is based on the health and safety regulations of the Board) will occur only after they obtain their apprentice license. This legislative

change would also allow the option for the Board to develop its own online training specifically for apprentices. (Underlying Data, p. 133 of Board report entitled “California State Board of Barbering and Cosmetology Sunset Review Report 2018”, Volume 1.)

Senate Bill 803 (SB 803 -- (Chapter 648, Statutes of 2021)) was enacted in 2021 and made the following statutory changes to BPC section 7334(c) in response to these concerns relevant to pre-apprentice training for the barbering profession only:

“(c) All persons making application as an apprentice in barbering shall also complete a minimum of 39 hours of preapprentice training **that is administered by the board.**” (Emphasis added.)

In 2023, Assembly Bill (AB) 2196 (Chapter 527, Statutes of 2022) was enacted, which among other things, amended both subdivisions (c) and (d) of BPC section 7334 to require that pre-apprentice training for all license types that have apprenticeship programs (barbering, cosmetology, skin care, nail care, or electrology) be “administered by the Board” for the length of time “approved by the Board” prior to serving the general public.

The Board’s current regulation at CCR 917 does not address how the Board would administer such training or the process and procedures an applicant for apprentice licensure would need to follow to show satisfactory completion of this requirement. Upon review, the Board is also proposing to reduce the current thirty-nine hours of instruction in specified subjects to two hours to streamline and more effectively provide the current training as further discussed below.

As a result of the foregoing, the following proposed amendments are necessary to implement this statutory authority change. The Board is seeking to amend section 917 of Title 16 of the CCR to make the Board’s regulation consistent with the updated statute that became effective January 1, 2023, under AB 2196 and to specify the processes and procedures an apprentice applicant will need to meet for this pre-apprentice training requirement pursuant to BPC section 7334, subdivisions (c) and (d).

The Board also proposes to make technical, non-substantive, and other clarifying changes regarding re-numbering and to change capitalization of “board” to “Board.”

Anticipated benefits from this regulatory action:

The Board has determined that the regulatory proposal will provide transparency in how the Board will administer the required pre-apprentice training and what applicants for licensure as an apprentice can expect to receive from completing the online training course. This will help ensure that applicants for licensure as an apprentice intending to enroll in an apprenticeship program do not incur unnecessary costs and expenses charged by apprenticeship sponsors. This will also strengthen protection of public health

and welfare and worker safety as the Board can ensure that applicants receive more effective training on the laws and regulations of the Board and basic patron protection and sanitation and disinfection procedures.

This regulatory proposal will benefit the health and welfare of California residents by ensuring that apprentice applicants receive instruction in the laws and regulations of the Board, basic patron protection and sanitation, and disinfection procedures. This would help ensure that individuals are prepared for their work as a licensee for the protection of the public, and do not inadvertently incur unnecessary costs and expenses from sponsors charging for the pre-apprentice training.

This regulatory proposal strengthens worker safety because it provides applicants for licensure as apprentices with current information on sanitation and disinfection procedures as well as resources to other government agencies that may be beneficial to their safety when using hazardous chemicals, such as the California Division of Occupational Safety and Health.

Specific purpose of, and rationale for, each adoption, amendment, or repeal:

Amend existing Section 917 of Division 9 of Title 16 of the California Code of Regulations.

Amend Existing Paragraph and Re-Number to Subsection (a):

A. Purpose:

- For better organization and comprehension of the regulation by the users, the Board proposes to re-number the existing paragraph as subsection (a)
- “board” would be amended to “Board”.
- Thirty-nine (39) hours of instruction would be amended to two (2) hours of instruction in existing subjects as specified (the laws and regulations of the Board, basic patent protection, and sanitation and disinfection procedures).
- The requirement to complete the pre-apprenticeship training prior to “being licensed as” an apprentice would be struck and a new phrase added to state that the training shall be completed “as required by this section” and “within the six-month period immediately” prior to applying for an apprentice license.

B. Rationale:

- For ease of comprehension the Board seeks to correct a typographical error and adopt a short-form reference with the capitalization of the word “Board” that more correctly identifies this Board as the Board of Barbering and Cosmetology throughout this section.

- The proposed amendments are necessary so applicants for licensure as an apprentice know, and have advance notice of, how long the Board-administered and prescribed training will take and the timeframe in which to complete the training.
- This proposal would implement requirements for pre-apprentice training in accordance with the authority set by BPC section 7334, which is required prior to issuance of an apprenticeship license by the Board. The Board proposes to strike the existing 39-hours of instruction in specified subjects and replace it with 2 hours of instruction for its Board-administered on-line training requirement. In 1994, the Board adopted the existing 39-hour requirement for this training covering the existing subjects of laws and regulations, basic patron protection, and sanitation and disinfection. Applicants are also already required to complete extensive coursework covering many of these subjects from schools approved by the Board, including coursework in barbering, cosmetology, electrolysis, nail care, skin care, and hairstyling (BPC §§ 7321, 7321.5, 7330, 7322, 7324 and 7326).
- In its experience, and after analyzing and developing its own training program in preparation for implementation of AB 2196, the Board has found what it believes to be a more effective and targeted training that can achieve the objectives sought by this legislation as set forth in this proposal. As noted in the Board's Sunset Review Report (see Underlying Data), the Board requested the authority to offer this training to address concerns that applicants for an apprenticeship license (applicants) were being overcharged for the training including reports that various applicants were being required to take the training more than once, thereby enabling program sponsors to charge students repeatedly for this training and at high costs. The Board has received numerous complaints from applicants regarding this practice and therefore sought legislative authority to develop a training program that would address what the Board believes is essential for safe practice while also addressing complaints by students that sponsors were overcharging students. When developing the content for the course, the Board realized that this lower number of hours was sufficient to provide currency of knowledge in basic patron protection and for an individual to safely practice when they are also being trained on-the-job and continually supervised.
- As noted in prior legislative history for SB 803 (see Underlying Data), apprentice pass rates for the Board's examinations are not high and the Board believes that administrative changes such as the Board assuming responsibility for the content of the training are necessary to help the Board assist applicants with passing the examination. The Board prepares the examinations for its various professions and is therefore best

suited to know how to target training to ensure students are better prepared for practice and examination in these areas. In addition, this reduction in hours of instruction are necessary to ensure future licensees are provided fair opportunities for licensure through the apprentice pathway. In its experience with enforcing this standard and in subsequent development of this program's materials, the Board believes that this course content and minimum 2-hour requirement will more effectively and sufficiently train applicants, thus reducing barriers to licensure not necessary for the protection of the public.

- To provide notice and set minimum standards for the content of the training and the processes and procedures that must be completed in order for an applicant to have met the requirements in BPC section 7334 for pre-apprentice training, the Board adds the words "as required by this section".
- To help ensure currency of knowledge, the Board proposes to strike "being licensed as" and replacing it with a requirement that an applicant complete the pre-apprentice training within the "six-month period immediately" prior to "applying" for an apprentice license. In the Board's experience, this time frame is the minimum necessary to ensure adequate currency of knowledge regarding these subjects prior to performing services on a member of the public as a licensed apprentice.

Adopt Subsection (b):

A. Purpose:

- Defines "basic patron protection and sanitation and disinfection procedures" to include disinfecting procedures of tools, linens, and equipment, standard handwashing procedures, blood exposure guidelines, minimum standards for the protection of patrons from hazardous chemicals, common violations and how to prevent them, physical and sexual abuse awareness, and professionalism.

B. Rationale:

- This proposed adoption provides greater notice and specificity of what topics the training shall include when the Board refers to "basic patron protection and sanitation and disinfection procedures." This is necessary so applicants for licensure as an apprentice know what to expect to learn from the training. Requiring these subjects in a pre-apprentice training course ensures students are provided instruction on the minimum standards that the Board would expect an apprentice to know, understand and comply with for the protection of the public and for their own health and safety and in accordance with the minimum standards by the Act and the Board's health and safety laws and regulations (see e.g., BPC

sections 7312(a)(5), 7314.3, and Article 12 (commencing with CCR section 977). These subjects include the following minimum educational standards.

Disinfecting procedures of tools, linens, and equipment and standard handwashing procedures: Requiring this subject matter in a training course ensures students are provided instruction in these areas that, if not followed, can create risk of illness for the public and the practitioner. Unclean tools, linens and equipment can carry many bacteria or viruses (germs) that can spread infection or other health hazards. Proper disinfection minimizes those risks and therefore training in this area is integral to help ensure public protection. Similarly, standard hand washing procedures training helps applicants understand how to employ simple procedures to help minimize the risk of spreading germs to themselves or others.

Blood exposure guidelines: Requiring this subject matter in a training course ensures students follow proper infection control procedures to help ensure safe practice. Occasionally, an accident can occur in the salon, such as an ear nip by the shears or a nick from a razor, which can expose a practitioner to blood contact, or a client or licensed professional may have open wounds/cuts/sores or rashes on their hands or face. Following blood exposure guidelines minimizes risks of infection and therefore training in this area is integral to help ensure public protection.

Minimum standards for the protection of patrons from hazardous chemicals: A hazardous chemical is any chemical which can cause a physical or a health hazard as determined by the chemical manufacturer (29 CFR § 1910.1200(d)). Working in an establishment that uses barbering and beauty products that contain hazardous chemicals can present the licensed professional (licensee) and their clients with unique challenges to staying healthy including increasing risk of health hazards. Requiring this subject matter in a training course helps ensure students follow minimum safety standards recommended by the manufacturer and by state and federal law or regulations governing the use of such chemicals to help minimize risk of physical or health hazards from the use of such chemicals.

Common violations and how to prevent them: Requiring this subject matter in a training course helps ensure students are instructed about these common violations of laws or regulations involving the professions with the goal of preparing them to identify and address these issues prospectively. In the Board's experience, advance knowledge helps prevent recurrent violations of laws and regulations that are designed to protect the public, thereby helping ensure a more informed and well-prepared apprentice in advance of providing services to the public.

Physical and sexual abuse awareness: Requiring this subject matter in a training course helps ensure students are instructed about these issues in accordance with the public policy of awareness of about physical and sexual abuse that a licensed professional's clients may be experiencing as outlined in BPC sections 7314 and 7314.5. Such training would help assist the Board's licensed professionals gain valuable tools and information so that they may be able to recognize signs of abuse for their clients and assist wherever possible.

Professionalism: Requiring this subject matter in a training course helps ensure students are instructed about treating clients with respect and courtesy in the professional relationship. In the Board's experience, many complaints and issues stem from the public's perception of how they were treated unprofessionally by a licensed professional and therefore believes it is valuable to remind students about this important aspect of the relationship to avoid complaints and misunderstandings that lead to investigation by the Board.

Adopt Subsection (c):

A. Purpose:

- Informs applicants of the registration process required to complete the online pre-apprentice training, the functionality of the course, and what they will receive as proof of completion of the Board-administered training.
- The introduction specifies that the pre-apprentice training will be completed online and administered by the Board, as specified in (c)(1) - (c)(3),
- Subdivision (c)(1) informs individuals that the registration process is available online on the Board's website at www.barbercosmo.ca.gov by accessing the web link on the Board's website entitled "pre-apprentice training", and providing their full legal name ((Last Name) (First Name) (Middle Name) and (Suffix), as applicable), email address, date of birth, telephone number, and social security number (SSN) or individual taxpayer identification number (ITIN).
- Subdivision (c)(2) explains that it is an interactive course with instructional modules with related teaching slides (slides) in the subjects listed in subsection (b) that a registered user (user) must review, and, includes correct completion of quizzes and activities after each instructional module has concluded as provided by this subsection.
- Subdivisions (c)(2)(A) – (D) define what "correct completion of quizzes

and activities” means for the purposes of subsection (c), which includes all of the following:

(A) Users must select the correct answer for each quiz or activity associated with a learning module to proceed through the course to its conclusion.

(B) If the incorrect answer is selected, users will be prompted to, and shall not be permitted to proceed with the course until, the user selects another answer and the correct answer is selected.

(C) Users shall not be permitted to skip or fast-forward through any module or slide included in the training.

(D) Upon completion of a slide, users must click an arrow to continue through and complete the course.

- Subdivision (c)(3) informs individuals that they will receive a digital completion certificate upon completion of the course for the user to download and print and what information the certificate will contain (the title “Certificate of Completion,” user’s full legal name, the course title, completion date, and the Board’s logo).

B. Rationale:

- This proposed adoption of this subdivision provides greater notice to applicants for licensure as an apprentice of how to register and complete the training administered by the Board. Existing regulations and law do not specify the process needed to register for or complete the Board’s pre-apprentice training. This section would establish such standards to ensure accurate, timely and complete information is received by the Board. This subdivision is necessary to inform applicants what must be submitted to satisfy the requirements in BPC section 7334 and this section and provide a complete list of requirements in one convenient location for applicants. Additionally, the use of an online pre-apprentice training course will make the process more efficient and accessible for all parties involved and allow the Board to collect information on users for apprentice applicant tracking purposes and to ensure that the course is completed prior to applying for the apprentice license.
- (c)(1): The proposed language adds several conditions that are necessary to establish the new online pre-apprentice training submission process for registering and completing the Board’s training on-line. The first is that specified information be submitted electronically through a web link on the Board’s website. This is necessary to inform applicants that the submission process begins by going to the Board’s website at www.barbercosmo.ca.gov and accessing the web link entitled “pre-apprentice training and providing specified identifying applicant information necessary for the Board to process their training request and allow them to complete the training. This identifying information is

necessary to create an account through the Board’s website, upon completion, generate the certificate of completion specified in subdivision (c)(3).

This section was added to provide clear guidance and instructions for applicants who need to register for and complete the online pre-apprentice training as outlined in this section. By establishing a new subdivision and establishing specific requirements, this proposal aims to simplify the registration and course completion process and ensure that all applicants can easily access and utilize this training available on the Board’s website. The registration requirements included in this section will help to streamline the process and ensure that applicants provide a completed and accurate registration to enroll in and complete the training.

- (c)(1)(E): Under the Executive Officer’s delegation of authority by the Board, the Executive Officer has added the word “Their” to subsection (c)(1)(E) before the words “Social Security Number” for consistency with the other personally identifying information listed here. The Board considers this change to be non-substantive in accordance with California Code of Regulations, Title 1, section 100 since it believes the addition of the pronoun for grammatical reasons would not alter the existing regulations’ requirements, rights or responsibilities for any person affected by the proposed regulations.
- (c)(2): This subdivision is necessary to provide information about the method of instruction for this proposed training course, which is an interactive course with instructional modules with related teaching slides that must be reviewed by the user and includes requirements for correct completion of quizzes after each instructional module has concluded. These requirements are necessary to specify how the teaching methodology of the course and to help ensure the efficacy of the proposed methods of instruction for the required course subject matter (as specified in subdivision (b)). These requirements also help ensure comprehension and active engagement throughout the learning process by including requirements that require correct responses to questions on the specified subject matter. Such completion would mandate “correct completion of quizzes and activities” as defined, but without requiring a “passing” score (as further explained below in the rationale for subdivision (c)(2)(A)-(D)).
- (c)(2), paragraphs (A)-(D): These requirements are necessary to help ensure comprehension and engagement throughout the learning process by including requirements that require correct responses to questions on the specified subject matter, repetition of question and answer until correct answers are selected for those how submit incorrect responses, prohibitions against “skipping” past instructional modules or slides, and

requirements for slide completion that mandates active manual “clicking” of an arrow on the slide to continue through the program.

- (c)(3): The purpose of this subdivision is to establish what proof of completion will be issued to an applicant to satisfy the requirement for completion of the Board-administered pre-apprentice training pursuant to BPC section 7334. This subdivision is necessary to establish what an applicant is required to provide the apprenticeship program sponsor as set forth in proposed subdivision (d) and what the Board determines is the minimum identifying and verification information to show course completion (i.e., the title “Certificate of Completion,” user’s full legal name, the course title, completion date, and the Board’s logo). The apprenticeship sponsor needs such proof to determine whether the applicant took the required training prior to permitting enrollment in an apprenticeship program since pre-apprentice training is required to be completed “prior to serving the general public” (which is what an apprentice is authorized to do, under the supervision of a licensee in a licensed establishment (BPC §§ 7332, 7334(b)(c) and (d)).

Existing law at BPC section 7337 requires for each type of application for licensure that, “Each application shall be accompanied by the required fee, and shall contain **proof of the qualifications of the applicant for examination and licensure.**” The Board therefore also uses such information for its own records as “proof” to verify the applicant’s compliance with the qualifying criteria in BPC section 7334 upon receipt of an apprentice licensure application.

Adopt Subsection (d):

A. Purpose:

- Requires the applicant that, upon completion of the pre-apprentice training program, to submit a copy of the Certificate of Completion (as specified in subdivision (c)(3)) to a Board-approved apprenticeship program sponsor (in accordance with CCR section 913) upon enrollment in the apprenticeship program.

B. Rationale:

- Per BPC section 7332, an apprentice is defined as any person who is licensed by the Board to engage in learning or acquiring a knowledge of barbering, cosmetology, skin care, nail care, or electrology, in a licensed establishment under the supervision of a licensee approved by the Board. Such supervision includes that the apprentice is “supervised at all times by a licensee approved by the board while performing services in a licensed establishment . . .” BPC section 7334(c) and (d) further specify that an apprentice shall complete pre-apprentice training that is administered by

this Board “prior to serving the general public.”

- This proposed adoption provides greater notice to applicants for apprentice licensure of what to do with the Certificate of Completion upon receipt to ensure that an applicant may provide services to clients under the supervision of a licensee at a licensed establishment as specified by agreement with their apprenticeship program sponsor, which is approved by the Board according to criteria set forth in CCR section 913. This is necessary to help ensure enrollment and timely completion of the apprenticeship program, which is a qualifying criterion for examinations and part of the pathway to full licensure (see proof of completion requirements at CCR section 924(d) and BPC section 7337(b)).

Adopt Subsection (e):

A. Purpose:

- Specifies that if the applicant does not complete the training required by this section within the time period required by this section, the individual must re-take and complete the training as required by this section to qualify for issuance of an apprentice license in accordance with Section 7334 of the Business and Professions Code.

B. Rationale:

- This proposed adoption will ensure that individuals have current knowledge prior to enrolling in an apprenticeship program and can plan to take the course accordingly. This helps the Board implement the legislative objective of providing additional training prior to practicing under supervision as an apprentice in a profession regulated by the Board. The Board also proposes these requirements to further specify and provide advance notice of the consequences for not complying with this timeliness requirement by providing that the individual must re-take and complete the training as required by this section to qualify for issuance of an apprentice license. Establishment of this standard is necessary to help enforce the timeliness requirement, help ensure greater currency of knowledge, and prevent those with outdated training from practicing on the general public.

Underlying Data

1. California State Board of Barbering and Cosmetology Sunset Review Report 2018, Volume 1
2. AB 2196 (Chapter 527, Statutes of 2022)
3. Assembly Committee on Business and Professions Committee Analysis on SB 803, dated July 14, 2021
4. Senate Floor Analysis for AB 2196, dated August 3, 2022
5. Board Meeting Agenda, Relevant Meeting Materials, and Minutes of February 26, 2024

Business Impact

The Board has made the initial determination that the proposed regulation will not have any significant statewide adverse economic impact directly affecting business including the ability of California businesses to compete with businesses in other states.

This initial determination is based on the following facts:

The proposed online pre-apprentice training program is offered free of charge to applicants as the Board is not authorized to charge a fee for providing this training to applicants. The requirements that were removed from BPC section 7334 for applicants to take pre-apprenticeship training “in a facility approved by the board” and instead added a new requirement that an applicant take training administered by this Board was legislatively determined by AB 2196 and amendments to BPC section 7334, and are not implemented as a result of this regulatory proposal. This proposal does not require any significant new expense or reporting, recordkeeping, or compliance measures on the part of businesses, including program sponsors and apprentices.

Apprentice applicants are currently required to complete pre-apprentice training and are not anticipated to incur additional workload or costs to register or complete the Board-administered version of the pre-apprentice training course.

The Board notes, applicants are currently required to pay up to \$2,500 per pre-apprenticeship training course, which results in annual costs to individuals (2,300) of approximately \$5.75 million per year with corresponding tuition fee revenues to training providers.

The Board further notes, any economic impacts, including costs (savings) or decreased revenues, are a result of current law and not this regulatory proposal.

Economic Impact Assessment

This Board has determined that this regulatory proposal will have the following effects:

- This regulatory proposal will not create or eliminate jobs within California nor create new businesses or eliminate existing businesses within California because apprentice applicants are currently required to complete pre-apprentice training administered by the Board and are not anticipated to incur additional workload or costs to register or complete the Board-administered version of the pre-apprentice training course. Any other economic impacts, including costs, savings, or decreased revenues are a result of current law.
- It will not affect the expansion of businesses currently doing business within the State of California because while this proposal provides the process of how the Board will administer the statutorily required pre-

apprentice training, program sponsors will still provide other educational components as well as assist apprentices with the required paperwork.

- It does not require any significant new expense or reporting, recordkeeping, or compliance measures on the part of businesses. Any other economic impacts, including costs, savings, or decreased revenues are a result of current law. Apprentices are currently required by law to complete pre-apprentice training and are not anticipated to incur additional workload or costs to complete the Board's free training version instead of training offered by program sponsors.
- This regulatory proposal benefits the health and welfare of California residents by ensuring that apprentice applicants receive instruction in the laws and regulations of the Board, basic patron protection and sanitation, and disinfection procedures in the most effective manner possible. This would help ensure that individuals are prepared for their work as a licensee and do not inadvertently incur unnecessary costs and expenses from sponsors charging for the pre-apprentice training.
- This regulatory proposal benefits worker safety because it provides applicants for licensure as apprentices with current information on sanitation and disinfection procedures as well as resources to other government agencies that may be beneficial to their safety when handling hazardous chemicals, such as the California Division of Occupational Safety and Health.
- This regulatory proposal does not affect the state's environment because it does not involve the environment. The regulation only concerns pre-apprentice training and ensuring that individuals are prepared prior to enrolling in an apprenticeship program.

Specific Technologies or Equipment

This regulation does not mandate the use of specific technologies or equipment. The regulation will require applicants to submit data to the Board electronically through the Board's on-line website. However, the Board anticipates that most individuals already have computers, cell phones, or have access to one or both. Therefore, this regulation would not require an applicant to obtain additional equipment or technology to comply with this regulation.

Consideration of Alternatives

No reasonable alternative to the regulatory proposal would be either more effective in carrying out the purpose for which the action is proposed or would be as effective or less burdensome to affected private persons and equally effective in achieving the purposes of the regulation in a manner that ensures full compliance with the law being implemented or made specific.

No such alternatives have been proposed, however, the Board welcomes comments

from the public.

Description of reasonable alternatives to the regulation that would lessen any adverse impact on small business:

No such alternatives have been proposed, however, the Board welcomes comments from the public.