

## **TITLE 16. BOARD OF BARBERING AND COSMETOLOGY**

### **FINAL STATEMENT OF REASONS**

**Hearing Date:** No hearing was originally scheduled or requested.

**Subject Matter of Proposed Regulations:** Pre-Apprentice Training

**Section Affected:** Title 16, Division 9, Article 3, Section 917, California Code of Regulations (16 CCR)

#### **Updated Information**

The Initial Statement of Reasons is included in the file; the information contained therein is updated as follows:

During the course of this rulemaking, the Board of Barbering and Cosmetology (Board) did not make revisions to the proposed language. No public hearing was originally set for this proposal, and none was requested. Board staff noticed the proposed rulemaking on November 1, 2024, with a 45-day public comment period ending on December 16, 2024. The Board received sixty-nine (69) which are summarized below.

The Board reviewed the comments at its February 10, 2025, meeting and approved the responses to the comments without further amendments to the text. The responses to the comments approved by the Board are summarized in the “Summary of, and Responses to, Comments Received During the 45-day Comment Period” section below.

Following discussion of those comments, the Board directed staff to take all steps necessary to complete the rulemaking process including the filing of the final rulemaking package with the Office of Administrative Law, authorizing the Executive Officer to make any non-substantive changes to the proposed regulation and the rulemaking documents, and adopting the proposed regulations as noticed for 16 CCR section 917.

#### **Local Mandate**

A mandate is not imposed on local agencies or school districts.

#### **Small Business Impact**

The Board has determined that the proposed regulations will not affect small businesses. Although small businesses owned by licensees of the Board may be impacted the Board does not maintain data relating to the number or percentage of licensees who own a small business; therefore, the number or percentage of small businesses that may be impacted cannot be predicted. However, to the extent that a licensee owns a small business, 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 Assembly Bill 2196 (Chapter 527, Statutes of 2022) with amendments to BPC section 7334.

The Board notes that 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.

### **Anticipated Benefits**

The Board has determined that this regulatory proposal will have the following benefits to the health and welfare of California residents, and worker safety. The Board has determined that the regulatory proposal will benefit the public by explaining 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 also 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 knowledgeable and prepared for their work as a licensee for the protection of the public. This proposal also helps ensure that applicants 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 information regarding resources available from other government agencies that may be beneficial to their safety when using 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 helping ensure that individuals are prepared prior to enrolling in an apprenticeship program.

## **Summary of, and Responses to, Comments Received During the 45-day Comment Period:**

The following (69) individuals/organizations submitted written comments to the Board on the proposed rulemaking to amend Title 16, California Code of Regulations (CCR) section 917 during the public comment period, which concluded on December 16, 2024:

**(1) Comments from Toni Gama (San Diego Cosmetology Apprenticeship Committee) received by email on November 13, 2024:** Gama submitted the following policy objection statements. Comments/questions are synthesized, and the proposed responses enumerated below.

A. Toni Gama expressed concern over the Board eliminating a 39-hour (in-person) Pre-Apprentice Training course. The commenter notes that an apprentice needs an orientation to explain the 2-year apprenticeship program, its components (OTJ and RSI) and regulations. Toni Gama further explained that apprentices should know about the state agencies overseeing the program and their responsibilities. In short, potential apprentices must be fully informed on this 2-year commitment and how it works. The commenter provided the following examples to further emphasize this point:

(1) The majority of individuals who contact her, both salon owners and potential apprentices, tell her that the apprenticeship information on the Board's website is confusing. Toni Gama represents that it is explained in a "manner so it makes sense to everyone and then answer any questions individuals have."

(2) Toni Gama's class has an introduction to the necessary paperwork and applications for both the Board and DAS (presumably the California Division of Apprenticeship Standards). Without detailed explanations Toni Gama believes it would be confusing, as well.

**Response:** The Board acknowledges the comments but makes no further edits to the text. The purpose of pre-apprentice training is to provide effective training on the laws and regulations of the Board, basic patron protection, and sanitation and disinfection procedures. This training serves as an introductory overview to prepare apprentices for their hands-on training while ensuring consumer safety. Following this, apprentices receive more in-depth and ongoing on-the-job training and classroom training in subjects related to their applicable apprenticeship program, which includes a mandatory 220 hours of instruction covering Health and Safety, and Disinfection and Sanitation as required by existing Board regulations at CCR section 915 as well as curriculum requirements covering instruction on laws and regulations at CCR sections 921-921.2). While the Board proposes to administer pre-apprentice training to students to satisfy its legislative mandate at Business and Professions Code (BPC) section 7334, this would not prevent Program Sponsors from holding orientation sessions with apprentices. In fact, the Board strongly encourages Program Sponsors to conduct orientations to support the success of the apprenticeship program.

B. Toni Gama expressed concern that the proposed course does not adequately address basic “patron” (client) protection, how to hold tools, chemical exposure, proper first aid procedures, and blood exposure guidelines due to the lack of hands-on, in-person simulation in the proposed training. The commenter explains that “we are not just talking about draping and throwing single-use items in the trash,” and questions how the Board training can help apprentices understand safety without “physically holding and manipulating a pair of shears and a razor in the appropriate (basic) manner or palm tools for protection and manipulate multiple tools together (i.e. combs, control tools, water bottle, etc.). There are important details just to show them [apprentices] how not to cut themselves or the client.”

The commenter explains that they outline the proper first aid procedures and blood exposure guidelines and covers details on the use of chemical safety through simulation. “Apprentices learn how to protect the client, the client’s skin, as well as their own eyes, skin, etc. Apprentices are instructed how to handle chemicals safely, chemical disposal methods, how and when to use personal protective equipment and how to apply different chemicals in a safe manner.”

The commenter further explains that she teaches proper handwashing procedures and “they then actually practice doing so.” The commenter explains that she teaches proper disinfection procedures, disinfectant mixing protocols and then each apprentice actually performs a disinfection procedure on multi-use tools. “Apprentices gain knowledge on clean and soiled tools and how to store properly before and after the disinfection procedure. Apprentices learn information on salon work area setup and how to keep everything in the appropriate sanitary conditions before, during and after each service.”

**Response:** The Board acknowledges the comment but makes no further edits to the text. The purpose of pre-apprentice training is to provide effective training on the laws and regulations of the Board, basic patron protection, and sanitation and disinfection procedures to students **prior** to entering an apprenticeship program and serving the public. This initial training gives potential apprentices a general overview to help them begin their on-the-job training while ensuring consumer safety. However, pre-apprentice training is not intended to cover detailed or in-depth topics, as these will be addressed during the on-the-job training when hands-on experiences are provided closer in time to when they will begin working with consumers. The on-the-job training curriculum is set at 3,200 hours per CCR section 916, including a minimum of 2,600 hours dedicated to hands-on, practical training in hairdressing for cosmetology apprentices, at CCR section 921.1. Apprentices are not expected to have expertise in chemical safety at the start of their training, though the pre-apprentice training will provide basic information. The on-the-job training curriculum includes 45 hours of technical instruction on health and safety/hazardous substances, protection from hazardous chemicals and preventing chemical injuries, and other related topics. (See 16 CCR sections 921-921.2).

C. Toni Gama expressed concern about the proposed training adequately explaining the details of the Board's Health and Safety Rules contained in the Board's Regulations at Article 12. Health and Safety to pre-apprentices, as it is an important subject and that "these details stemming from Article 12 must encompass an overview of Infection Control." In addition, Toni Gama expressed concern about when the Board would expect the Health and Safety Course information to be incorporated into Apprenticeship Programs or in related training. The commenter stated that "We only have minimum 220 hours to cover a full cosmetology curriculum and prepare the apprentice for their state exam."

**Response:** The Board acknowledges the comments but makes no further edits to the text. The purpose of pre-apprentice training is to provide effective training on the laws and regulations of the Board, basic patron protection, and sanitation and disinfection procedures. This initial training gives potential apprentices a general overview to help them begin their on-the-job training while ensuring consumer safety. However, pre-apprentice training is not intended to cover detailed or in-depth topics, as these will be addressed during the on-the-job training as specified in the responses to this commenter noted above. An apprentice is not expected to be proficient in all aspects as they begin their training. The on-the-job training and curriculum for an apprentice is set at 3,200 hours; technical Instruction in Health and Safety subjects can be incorporated at any time throughout the curriculum which is set at a minimum of 220 hours as noted above. Related Training must provide a minimum of 220 hours of classroom instruction, which among other topics includes Health and Safety (see CCR sections 921-921.2).

D. Toni Gama expressed concern regarding the scope of the proposed subject matter of the proposed training, suggesting adding in some information on licenses, establishments, posting of the consumer information message and stating "all are relevant." Presumably for his training, apprentices learn where each license is to be posted appropriately within the establishment. "We go into license expiration and renewal dates and the differences in licensees with emphasis on scope of practice."

**Response:** The Board acknowledges the comments but makes no further edits to the text. The purpose of pre-apprentice training is to provide effective training on the laws and regulations of the Board, basic patron protection, and sanitation and disinfection procedures. This initial training gives potential apprentices a general overview to help them begin their on-the-job training while ensuring consumer safety. However, pre-apprentice training is not intended to cover detailed or in-depth topics for all aspects of practice, as these will be addressed during the on-the-job training. An apprentice is not expected to be proficient in all aspects as they begin their training. An apprentice is receiving 3200 hours of on-the-job training in which all of this should be provided.

E. Toni Gama offered that they cover Sexual Harassment Prevention Training by utilizing [calcivilrights.ca.gov](http://calcivilrights.ca.gov)

**Response:** The Board acknowledges the comment but makes no further edits to the text. The purpose of pre-apprentice training is to provide effective training on the laws

and regulations of the Board, basic patron protection, and sanitation and disinfection procedures. This initial training gives potential apprentices a general overview to help them begin their on-the-job training while ensuring consumer safety. However, pre-apprentice training is not intended to cover detailed or in-depth topics, as these will be addressed during the on-the-job training. The Board appreciates Toni Gama for reviewing Sexual Harassment Prevention Training with apprentices, but the Board has no requirements for Sexual Harassment training for apprentices, nor pre-apprentices. In accordance with BPC section 7314.3, the Board has developed information and brochures available on its website at [www.barbercosmo.ca.gov](http://www.barbercosmo.ca.gov) on basic worker rights including how to ensure licensees have awareness about physical and sexual abuse their clients may be experiencing and the right to have a harassment-free workplace, which is available to all licensees free of charge.

F. Toni Gama expressed her opinion that a pre-apprentice class has to include a full workshop on Apprentice Daily Records. The commenter expressed her concerns on educating pre-apprentice on correctly filling out and storing Apprentice Daily Records and when a copy must be submitted in a timely manner to the sponsors for proper accountability, recording and auditing.

**Response:** The Board acknowledges the comments but makes no further edits to the text. CCR Section 920 states the Record of the Apprentice Training must be presented and signed by the trainer and prescribes the required content. The trainer and the apprentice should be completing these records together during the on-the-job training; however, it is the trainer's responsibility to ensure the records are accurate and complete, and to provide the training records to the Board or its representative upon demand, not the apprentice. As a result, no pre-apprentice training on this subject would be mandated under this proposal.

G. Toni Gama expressed concerns over a Sponsor explaining "the details of Related Supplemental Instruction (Related Training) and how the classes are scheduled, the curriculum, assignments, tests, etc?"

**Response:** The Board acknowledges the comment but makes no further edits to the text as they are unrelated to this proposal. As set forth in applicable California Apprenticeship Council regulations administered by DAS beginning at title 8, California Code of Regulations (CCR) section 212, Program Sponsors' apprenticeship programs must meet certain minimum standards to be approved in California: "in order to be approved, the standards must cover all work processes within the apprenticeable occupation." (8 CCR § 212). The standards must contain statements regarding, in particular, the duties of the apprentice; and the apprentice's working conditions unique to the program as well as provisions for training and supervision of those apprentices on these standards (8 CCR § 212 and Labor Code section 3078). As a result, the Program Sponsors should provide comprehensive explanations of all aspects of the apprenticeship program before an apprentice formally enrolls. This includes clearly outlining the specific requirements of the program, such as the duration, learning



objectives, and skills to be acquired. Sponsors should also detail the expectations for apprentices, including attendance, performance, and any necessary assessments. Additionally, they should inform potential apprentices about the benefits and opportunities the program offers, including hands-on training, mentorship, and career prospects. By offering this detailed information upfront, Program Sponsors ensure that apprentices are fully informed about what to expect, allowing them to make well-informed decisions about participation in the program and in accordance with applicable labor regulations governing these apprenticeships in California.

H. Toni Gama expressed concerns on “sending an apprentice with a 2-hour certificate straight into a professional, fast-paced working salon is a recipe for failure. It is not with reality [sic] to think a salon professional can hold the hand of the apprentice for a continual amount of time. All trainers are different and exhibit professional salon techniques using their individual styles. An apprentice needs to learn very basic foundational concepts beforehand. Giving the apprentice basic (extremely basic) information creates a more confident individual when they walk into the salon for the first time.”

**Response:** The Board acknowledges the comments but makes no further edits to the text. As noted in previous responses, the purpose of pre-apprentice training is to provide a general overview of the most relevant topics prior to entering an apprenticeship program, and in the Board’s experience, the proposed training would accomplish that objective. Apprentice programs typically do not include pre-apprentice training, as the primary goal of the program is to provide hands-on, on-the-job training to the apprentice. The intent is for apprentices to learn practical skills and gain knowledge directly related to their trade or profession while working under the guidance of experienced trainers. It is essential that Program Sponsors and trainers ensure that the curriculum is being strictly followed throughout the apprenticeship. This curriculum should be structured to align with the specific skills and competencies the apprentice needs to master in order to succeed in their field.

While apprentices receive compensation for their work, it’s important to emphasize that the apprenticeship program is not solely an employment opportunity. Rather, it is a structured learning experience designed to ensure that apprentices are acquiring the necessary skills and knowledge required to become fully qualified professionals in their trade. Apprentices must be actively learning and developing their abilities while working, and the training process must include a combination of work-based learning and formal instruction. The focus should be on skill acquisition, not just completing tasks or providing labor. By upholding these standards, Program Sponsors ensure that apprentices receive a comprehensive educational experience that prepares them for long-term success in their chosen career.

I. Toni Gama expressed concerns regarding a fee “cap” on apprentice training and the commenter’s understanding that programs could not ever charge above the \$2,500 amount. The commenter states that they currently only charge \$2,499.00 for their pre-

apprentice training course, which does not adequately cover all costs associated with the training and materials she provides in her current 39-hour Pre-Apprentice training program. In addition, she expressed an opinion that this fee cap was never going to be enforced by the Board she "... could have doubled my income each and every year for the last 6 years. Even though this program is small, that is a sizable amount of income I have 'lost'." She further indicated that "[i]nquiries into our program tell me (all the time) the quotes given by other apprenticeship programs. Through the years, I have come to the conclusion that I am probably one of only a handful of programs following "regulation" and not charging above the amount set in 2019."

**Response:** The Board acknowledges the comments but makes no further edits to the text. The Board is not aware of any law or regulation that caps the fee charged for pre-apprentice training at \$2,500, or authorizes the Board to set the amount a program can or cannot charge its students. The Bureau for Private Postsecondary Education (Bureau) has a law that states that an educational institution that does not award degrees and that solely provides educational programs for total charges of two thousand five hundred dollars (\$2,500) or less is exempt from the requirement to be approved by the Bureau (see California Education Code section 94874(f)).

Unrelated to that law, the Board is seeking to amend section 917 of Title 16 of the CCR to make the Board's regulation consistent with the updated statutes that became effective January 1, 2023, under AB 2196 at BPC sections 7334(c) and (d), which require the Board to develop a program to administer the pre-apprentice training for the barbering, cosmetology, skin care, nail care, and electrology professions. This regulation simply implements that law, which mandates that the Board administers this training program instead of schools or other training providers. As set forth in the Board's Notice of Proposed Regulatory Action, the Board estimates that current fees paid by students for this pre-apprentice training 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 or decreased revenues to training providers resulting from this change, are a result of current law at BPC section 7334 and not this regulatory proposal.

**(2) Comments from Stephany Meyer, Approved Program Sponsor, FourM Education CBAC, sent by mail and received on December 13, 2024:** Meyer submitted policy objection statements. Comments/questions are synthesized and proposed responses enumerated below.

A. Stephany Meyer expressed opposition to the proposal to reduce the pre-apprenticeship training requirement from a 39-hours to 2-hours. She states, "I firmly believe that this reduction will adversely affect the quality of apprenticeship programs, jeopardize public safety, and undermine the professionalism of our [barbering and cosmetology] industry".



**Response:** The Board acknowledges the comment but makes no further edits to the text. 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. As noted in prior legislative history for SB 803, 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 apprenticeship pathway. In its experience with implementing this pre-apprenticeship training standard since 1994, 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.

B. Stephany Meyer notes: [t]he current framework established under SB 803, effective January 1, 2023, through B&P Code 7334(c), provides clear guidelines for delivering pre-apprenticeship training."

**Response:** The Board acknowledges the comments but makes no further edits to the text. SB 803 was enacted in 2021 and made changes to BPC section 7334(c) in response to concerns relevant to pre-apprentice training for the barbering profession only to be administered by the Board. In 2023, Assembly Bill (AB) 2196 (Chapter 527, Statutes of 2022) was enacted, which among other things, amended BPC section 7334(d) to make corresponding changes to require that pre-apprentice training for all other applicable apprenticeship programs (cosmetology, skin care, nail care, or electrology) be "administered by the board for the length of time established by the board". However, those statutory "guidelines" are not precisely clear, as Section 7334 does not state what the Board-administered training requirements are or the length of time the Board has established for that training. The Board's current regulation at CCR section 917 similarly does not address the content of pre-apprenticeship training administered by the Board, how the Board would administer such training or the process and procedures an applicant for apprentice licensure would need to follow to show what the Board deems satisfactory completion of this requirement in accordance with BPC section 7334. This proposal would establish those standards. As noted in the prior response, after reviewing the required specified subjects for pre-apprentice training, the Board reduced the current 39-hours of instruction to 2-hours to streamline the required training to ensure apprentices receive effective training on the laws and regulations of the Board, basic patron protection, and sanitation and disinfection procedures.

C. Stephany Meyer further stated “Pre-apprentice training is vital for”: “Ensuring Public Safety,” and that a reduction to 2 hours inadequately prepares apprentices in patron protection, sanitation and disinfection.

**Response:** The Board acknowledges the comment but makes no further edits to the text. As noted in prior responses to this commenter, after reviewing the required specified subjects for pre-apprentice training, the Board reduced the current 39-hours of instruction to 2-hours to streamline and more effectively provide the required training to ensure apprentices receive effective training on the laws and regulations of the Board, basic patron protection, and sanitation and disinfection procedures.

The requirements for technical and practical instruction are now specified in the Barbering and Cosmetology Act and cover all subject areas required to be taught in schools for each profession (BPC sections 7362.5, 7363, 7364, 7365, and 7366). An apprentice also completes related training (220 hours per 16 CCR 915) during their apprenticeship program. Therefore, the Board asserts that an apprentice is receiving a lot of technical instruction throughout their program prior to full licensure. The requirements for additional pre-apprentice training are a separate requirement, however, and are designed to reinforce those aspects of specified standards that the Board believes apprentices need to meet minimum standards and avoid violations prior to practicing on the public. The Board believes that the current proposal accomplishes that objective.

D. Stephany Meyer also raises concerns about “Upholding Professional Standards”, and that reducing the required pre-apprentice training hours will dilute the standards the industry has worked hard to establish.

**Response:** The Board acknowledges the comment but makes no further edits to the text. The purpose of pre-apprentice training is to provide effective training on the laws and regulations of the Board, basic patron protection, and sanitation and disinfection procedures. This initial training gives potential apprentices a general overview to help them begin their on-the-job training while ensuring consumer safety. However, pre-apprentice training is not intended to cover detailed or in-depth topics, as these will be addressed during the on-the-job training. As noted in the responses above, the Board believes that, in its experience and in preparation of the training materials, applicants will be sufficiently prepared to enter an apprenticeship program where they will receive more in-depth, on-the-job training supervised by a licensed professional.

E. Stephany Meyer raises concerns about “Aligning with Labor and Industry Regulations”, in that reduction in training requirements undermines agreements between apprentice training programs under DAS oversight, Labor Code 3091.

**Response:** The Board acknowledges the comment but makes no further edits to the text as the Board must comply with the statutory changes made by Assembly Bill (AB) 2196 (Chapter 527, Statutes of 2022). Further, Labor Code section 3091 states:

Acceptance of an application for entrance into an apprenticeship training program shall not be predicated on the payment of any fee. Reasonable costs for expense incurred may be charged after an applicant has been accepted into the program.

Since the Board's proposal relates to the Board's administration of its own **pre-apprenticeship** training program requirements in accordance with statutory authority, it is unclear how this Labor Code relating to the prohibition on charging applicants "reasonable costs" would be related. Further, there should be no further expenses incurred for providing the pre-apprentice training by training providers, sponsors or schools since the Board is bearing the costs to provide this training (since the law does not authorize the Board to charge a fee for this service) to apprentice applicants as required by BPC section 7334.

F. Stephany Meyer notes former board staff encouraged programs to continue to deliver "the pre-apprenticeship curriculum until Barber Cosmo had developed its own". The commenter also refers to BPC section 7334(c), noting the reduction disregards the intention of SB 803 (2021).

**Response:** The Board acknowledges the comment but makes no further edits to the text as the Board must comply with the statutory changes made by both SB 803 and AB 2196 (Chapter 527, Statutes of 2022), which set forth requirements for the Board to develop its own pre-apprenticeship training program and which it now has done. The Board has located nothing in the legislative history of either SB 803 or AB 2196 that would indicate that a reduction was not warranted. On the contrary, with the enactment of AB 2196, the Board notes that the Legislature struck the "minimum of 39 hours of preapprentice training" requirement from the statute (see prior version of BPC section 7334 (Stats.2021, Ch. 648 (SB 803)), and instead authorized this Board to establish the length of time. This indicates a legislative intent to defer setting the length of time for the pre-apprentice training to the discretion of this Board. For the reasons already noted above in prior responses, the Board believes the 2-hour requirement is sufficient to address all of its policy objectives.

G. Stephany Meyer notes they have included in this comment submission apprenticeship surveys completed by students in their program with personal feedback on "how this training has positively impacted their ability to perform confidently and competently".

**Response:** The Board acknowledges the comment but makes no further edits to the text. The Board acknowledges receipt of 67 survey letters with personalized responses included within the survey questions, which are summarized and responded to separately below.

H. Stephany Meyer urges the Board to maintain the 39-hour pre-apprentice training, engage with stakeholders in collaborative discussion to address concerns and improvements, and evaluate the implications the proposed change will have on the industry.

**Response:** The Board acknowledges the comment but makes no further edits to the text. The Board has noticed this rulemaking proposal to engage all stakeholders regarding this proposal. As noted previously, the purpose of pre-apprentice training is to provide effective training on the laws and regulations of the Board, basic patron protection, and sanitation and disinfection procedures. This initial training gives potential apprentices a general overview to help them begin their on-the-job training while ensuring consumer safety. However, pre-apprentice training is not intended to cover detailed or in-depth topics, as these will be addressed during the on-the-job training. The Board reduced the current 39-hours of instruction to 2-hours to streamline and more effectively provide the required training to ensure apprentices receive effective training on the laws and regulations of the Board, basic patron protection, and sanitation and disinfection procedures. For the reasons already noted above in prior responses, the Board believes this proposal is sufficient to address all of its policy and consumer protection objectives.

I. Stephany Meyer stated, “The proposed reduction compromises the integrity of our profession” and “requests the Board to prioritize the quality of the training over expediency and maintain” the existing pre-apprenticeship structure until a robust and equivalent alternative is in place.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons already provided in responses above. In addition, as noted in the Board’s last Sunset Review Report, 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 training providers and 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. This proposal would address what the Board believes is essential for safe practice under supervision as an apprentice while also addressing complaints by students that training providers 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 specified areas and for an individual to safely practice when they are also being trained on-the-job and continually supervised.

**Listed below are the (67) student surveys Meyer mentions in comment #2.G. above. The Board acknowledges the surveys received but makes no further edits to the text for the following reasons:**

#### **General Response to All Survey Input:**

The Board acknowledges the comments in all surveys from students but makes no further edits to the text. The Board appreciates the individualized input from students

regarding their opinions on their current training program and concerns about the current Board proposal (as set forth below). However, since these issues were first raised in the Board's last Sunset Report in 2018 (see Underlying Data), the Board's overall concerns with the current pre-apprentice training model remain. This means an overhaul of the way current pre-apprentice training is being provided. In addition to the policy statements in prior responses above, this proposal is necessary to ensure future licensees are provided fair opportunities for licensure through the apprentice pathway. In its experience with enforcing this pre-apprenticeship training standard and in subsequent development of this program's materials, the Board believes that this online course content and minimum 2-hour requirement will more effectively and sufficiently train applicants than the existing regulatory requirements, thus reducing barriers to licensure not necessary for the protection of the public.

### **(3) Comments from Angel Andrews:**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Andrews selected "Extremely important".
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Andrews selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Andrews selected "No" and provided a comment "in-person I get a better understanding than a video and feel more prepared."
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Andrews provided a comment, "learning how to work with clients, different styles of hair textures and seeing how my trainer works in a day-to-day Barbershop career."
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Andrews selected "True, the safety and quality would be negatively impacted".
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Andrews comment, "The pre-apprenticeship helps with the hands on learning and actual in shop experience before getting licensed. Learning care of clients building relationships and with the trainers that can show you on the job training for day to day."

**Response:** The Board acknowledges the comments but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(4) Comments from Sasha Alvarez:**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Alvarez selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Alvarez selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Alvarez selected “No” and provided a comment “No, b/c [because] 2 hours is not sufficient enough in order to go in dept of the importance of certain topics”
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Alvarez provided a comment, “When in between clients it is crucial to understanding the importance of disinfection and sanitation, which I learned at apprenticeship.”
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Alvarez selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Alvarez comment, “I think this program is crucial and the much better alternative to regular cosmetology school.”

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(5) Comments from Jesse Auna:**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Auna selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?



- a) Auna selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Auna selected “No” and provided a comment “The 39-hour in-person training is better because it is hands on, something you cannot learn or get a better understanding on unless you can ask questions.”
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Auna provided a comment, “One example would be how to properly clean all my barber tools and equipment. Another example would be if I needed help on a haircut or had any questions I could ask my peers.”
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Auna selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) Auna comment, “My experience as a barber apprentice has been great, I have met so many new people. Have made many new connections with different people and have learned way more because I’m able to be hands on.”

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

#### **(6) Comments from Giovanni Ceballos:**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Ceballos selected “Extremely important”.
- 2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Ceballos selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Ceballos selected “No” and provided a comment “because I feel it helps more being hands on”.
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:

- a) Ceballos provided a comment, “live sharing and situations”.
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Ceballos selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) Ceballos comment, “I love this pre-apprenticeship it helped me learn a lot and learning how to properly sanitize after every client.”

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(7) Comments from Ana Espinoza Gonzalez:**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Espinoza Gonzalez selected “Extremely important”.
- 2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Espinoza Gonzalez selected “Yes, a pre-recorded video could effectively cover these aspects”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Espinoza Gonzalez selected “No” and provided a comment “I feel that as a hands-on learner it is vital for me to have on hands practice and knowledge”.
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Espinoza Gonzalez provided a comment, “Understand real world situations if things are not done correctly”.
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Espinoza Gonzalez selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) Espinoza Gonzalez did not provide a comment.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(8) Comments from Samuel P. Fernandes:**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Fernandes selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Fernandes selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Fernandes selected “No” and provided a comment “because I feel it helps more being hands on”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Fernandes provided a comment, “Dealing with people and their hair was very important for me to understand them to cater to their hair needs. Understanding the type of products (knowledge I gained in class) was very important for my professional life”.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Fernandes selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Fernandes comment, “My experience is very positive since I can get a real feel of what working in a Barbershop is like, so I can be more secure of what I’m doing in the future.”

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(9) Comments from Andres Gonzalez:**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Gonzalez selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Gonzalez selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?

- a) Gonzalez selected "No" and provided a comment "nothing prepares you more than hands on practice".
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Gonzalez provided a comment, "I learned how to properly sanitize and clean tools before and after every single service".
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Gonzalez selected "True, the safety and quality would be negatively impacted".
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) Gonzalez comment, "I've learned a lot from many other barbers which include techniques, steps and processes. Very good hands on practices to improve my barbering career. Amazing school!!!".

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(10) Comments from Diana Lopez:**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Lopez selected "Extremely important".
- 2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Lopez selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Lopez selected "No" and provided a comment "I would lose focus faster. There are also people who are hands on learners like me".
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Lopez provided a comment, "Opened the opportunity to branch out and has helped me figure out what I would like to specialized once being done with apprentice program. Also has taught me how to work faster with efficiency".
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?

- a) Lopez selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) Lopez comment, “Having one on one communication with the teacher, and has also helped branch out the meeting new people that can also give advice with their own experiences. Overall opens up new opportunities for growth”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(11) Comments from Fatema Mohebbi:**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Mohebbi selected “Somewhat important”.
- 2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Mohebbi selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Mohebbi selected “No” and provided a comment “Because maybe we have a question or problem and in person is better”.
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Mohebbi provided a comment, “No, work in a salon”.
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Mohebbi selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) Mohebbi comment, “No experience in a salon”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(12) Comments from David Ortega:**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?

- a) Ortega selected "Extremely important".
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Ortega selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Ortega selected "Yes".
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Ortega provided a comment, "I know the 'blood exposure' procedures".
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Ortega selected "True, the safety and quality would be negatively impacted".
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Ortega comment, "Fairly simple experience in the pre-apprenticeship".

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(13) Comments from Valeria Perea:**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Perea selected "Extremely important".
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Perea selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Perea selected "No".
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Perea provided a comment, "It has helped me not burn hair. What brands are good and healthy. How to treat customers".
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?



- a) Perea selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) Perea comment, “It’s helping me to learn more communication skills as well as being quick and clean and how to manage my time”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(14) Comments from Susana Pompa Mejia:**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Mejia selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Mejia selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Mejia selected “No”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Mejia provided a comment, “Yes, I had a friend that came in for a hair color and I had to say no to her, because her hair was damage from current hair dye. I have learned that something you have to say no, that way safety for her and me. Didn’t want her hair falling off or anything else happening”.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Mejia selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Mejia comment, “Being here has helped me learn a lot of things for the salon I am in. Also this school gives us the opportunity to work in a solon, so when we get our license we know how working in a solon is or if later on we want to manage our own salon”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(15) Comments from Isaac Ramirez:**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Ramirez selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Ramirez selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Ramirez selected “No” and provided a comment “Because I am a hands on learner”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Ramirez provided a comment, “I learned how to carefully clean and disinfect an area when cutting a client using gloves, clippers and powder”.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Ramirez selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Ramirez comment, “I love the pre-apprenticeship program I have been super confident and better at working at a barber shop. I have also learned a lot about cleaning and disinfecting. The pre-apprenticeship has also helped me financially”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

#### **(16) Comments from Sofia Rivera:**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Rivera selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Rivera selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?

- a) Rivera selected “No” and provided a comment “It would not provide the same level, because there are many unanswered questions that are only specifically answered by a human.”
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Rivera provided a comment, “One of the many examples that I have is learning that all brands of color and bleach work differently. For example, using a different peroxide or even sometimes no peroxide, depending on different areas of the hair and porosity. My trainer taught me that.”
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Rivera selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on your experience in the pre-apprenticeship:
  - a) Rivera comment, “I have had a great experience in this academy. I’ll be able to help my family pay rent while staying in school. Having to come only four hours a week has been extremely helpful for my job and financial situation.”

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(17) Comments from David Salas:**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Salas selected “Extremely important”.
- 2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Salas selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Salas selected “No” and provided a comment “39 hour in person will be more engraved in your head and I feel makes more of an impact being in person”.
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Salas provided a comment, “When I accidentally nicked someone, I was able to know exactly what to do without panicking”.

5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Salas selected "True, the safety and quality would be negatively impacted".
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Salas comment, "It helped me be more confident on ensuring the safety for each client I attend and have learned a lot to which I had thought I knew all of it".

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(18) Comments from Carlos Rodriguez:**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Rodriguez selected "Extremely important".
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Rodriguez selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Rodriguez selected "No" and provided a comment "No because in person has help me grow and developed my skills".
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Rodriguez provided a comment, "Its helped me follow proper protocols like knowing the proper ways of shaving and learning about chemicals and how to properly use them".
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Rodriguez selected "True, the safety and quality would be negatively impacted".
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Rodriguez comment, "Learned a lot of knowledge from barbers here and its helped me improve a lot".

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(19) Comments from Stephen Toledo:**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Toledo selected "Extremely important".
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Toledo selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Toledo selected "No" and provided a comment "I don't believe it could provide the same understanding because it's important to ask questions to have a deeper understanding".
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Toledo provided a comment, "This one walk-in came in with abrasions on the back of his head. I learned that I can't cut hair with cracked skin. Especially when they bleed. I politely told him that I can't do a hair service for his safety. He came back with healthier skin, happy client".
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Toledo selected "True, the safety and quality would be negatively impacted".
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Toledo comment, "Pre-apprenticeship has set me up really good for my barbering career. Helped me with experience and learning real life situations. Way better than traditional barber school".

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(20) Comments from Ruben Urbalejo:**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Urbalejo selected "Extremely important".
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Urbalejo selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".

3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Urbalejo selected "No".
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Urbalejo provided a comment, "Not knowing how to handle a client of to properly handle hair and tools Barbershop Apprenticeship is 100% better
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Urbalejo selected "True, the safety and quality would be negatively impacted".
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Urbalejo comment, "Leave the Apprenticeship program alone ITS WORTH IT!".

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(21) Comments from Johnathan Villanueva:**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Villanueva selected "Extremely important".
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Villanueva selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Villanueva selected "No" and provided a comment "Its always nice to have someone personally be there and teach you if you have any questions".
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Villanueva provided a comment, "When you are a beginner it is nice to have someone next to you helping/teaching you step by step if you get stuck you have someone to guide you and teach you how to do better and improve yourself".
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?



- a) Villanueva selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) Villanueva comment, “I like how everyone helps each other in class. We learn different techniques and how to better ourselves”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(22) Comments from Maria Magdalena Cruz (survey responses were translated from Spanish to English as follows):**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Cruz selected “Somewhat important”.
- 2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Cruz selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Cruz selected “No”.
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Cruz provided a comment, “I learned to know my rights and responsibilities within the beauty salon that I did not know before.”.
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Cruz selected “False, there would be no negative impact on safety or quality”.
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) No comment.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(23) Comments from Ferney Camilo Franco A (survey responses were translated from Spanish to English as follows):**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?

- a) Franco selected "Extremely important".
- 2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Franco selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Franco selected "No" and provided a comment "No because it is more effective to discuss and educate the conclusions in person of the topics seen in class."
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Franco provided a comment, "to be able to correct errors such as poorly made cuts by colleagues".
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Cruz selected "True, safety and quality would be negatively affected".
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) No comment.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(24) Comments from Ma Isabel Kim (survey responses were translated from Spanish to English as follows):**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Kim selected "Extremely important".
- 2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Kim selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Kim selected "No" and provided a comment "No because I wouldn't learn from other classmates".
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:

- a) Kim provided a comment, “Personally, I have learned more from the anecdotes of the teach and my classmates regarding hygiene safety”.
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Kim selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) Kim comment, “My experience has been good, I learn from everyone”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(25) Comments from Jesus Eduardo Ordeno Guzman (survey responses were translated from Spanish to English as follows):**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Ordeno Guzman selected “Extremely important”.
- 2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Ordeno Guzman selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Ordeno Guzman selected “No” and provided a comment “Because it is necessary to develop the topics well that are of regular interest and learn from others”.
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Ordeno Guzman provided a comment, “I have had to solve more detailed hair charts to apply the experience that I have gained over the years”.
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Ordeno Guzman selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) Ordeno Guzman comment, “The importance of essentials classes is to share each other’s experiences and learn from each other and absorb the teaching of the teachers”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(26) Comments from Christian Castaneda (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Castaneda selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Castaneda selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Castaneda selected “No” and provided a comment “Because if I had a doubt, I couldn’t ask questions and solve it”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Castaneda provided a comment, “The management of chemical substances”.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Castaneda selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Castaneda comment, “The learning is very complex, and I can solve my doubt and learn new things”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(27) Comments from Eduardo Castaneda (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Castaneda selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Castaneda selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.

3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Castaneda selected “No” and provided a comment “I learn best in a one-on-one relationship”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Castaneda provided a comment, “The management of chemicals in different circumstances”.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Castaneda selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Castaneda comment, “Learning comes from various sources, both from books and teachers and the opinions or experience of the students themselves”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(28) Comments from Rosa Suarez Lopez (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Suarez Lopez selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Suarez Lopez selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Suarez Lopez selected “No” and provided a comment “Because we all participate on the topics we discuss in class”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Suarez Lopez provided a comment, “I learned about hygiene and about the rights as a barber and worker”.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?

- a) Suarez Lopez selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on your experience in the pre-apprenticeship:
  - a) Suarez Lopez comment, “For me it was a positive experience in my learning as a barber. It is important to know everything explained in my class. It is important to learn everything physically”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(29) Comments from Estela Garcia Flores (survey responses were translated from Spanish to English as follows):**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Garcia Flores selected “Extremely important”.
- 2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Garcia Flores selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Garcia Flores selected “No” and provided a comment “The amount of attention, focus and participation of opinions are different than face-to-face training”.
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Garcia Flores provided a comment, “Examples of hygiene I learned to have more responsibility for contagious diseases”.
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Garcia Flores selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on your experience in the pre-apprenticeship:
  - a) Garcia Flores comment, “Learn a lot about hygiene, worker protection, how you handle chemicals (SDS (CADSHA), ergonomics, postures, tools, etc very essential to have specific knowledge when entering the world of the industry”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.



**(30) Comments from Sara Vargas (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Vargas selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Vargas selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Vargas selected “No” and provided a comment “The amount of attention, focus and participation of opinions are different than face-to-face training”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Vargas provided a comment, “Know of hygiene rules. Knowledge of OSHA, knowledge of employee-client interaction, professional standards, and knowledge of specific techniques”.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Vargas selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Vargas comment, “The most important thing is to master everything related to customer service and all the knowledge of hygiene rules given by OSHA, labor safely, regulation laws of Barbering and cosmetology, work situation, employment rules and commitment to knowledge on how to develop haircuts, dyes, straightening, hairstyles etc. this knowledge is important.”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(31) Comments from Delson David (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) David selected “Extremely important”.

2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) David selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) David selected “No” and provided a comment “A video is only material and presential are both. I say that they are not the same for example in the case when you are doing a dune braid dye in the video, they can teach you how to do them and in the present they will practice doing it.”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) David provided a comment, “for your safely and the safety of customers, you must clean the work equipment after each cut to keep it clean or safely treat all customers”.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) David selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on you experience in the pre-apprenticeship:
  - a) David comment, “from my experience I can say it is very importance because it will teach you some very important points, for example how you should treat a client. The precautions you must take to ensure the safety of the client salon and the products”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(32) Comments from Jesus Eden Madina Garcia (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Madina Garcia selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Madina Garcia selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?

- a) Madina Garcia selected “No” and provided a comment “No because the instructors’ explanations were consistently precise and better explained and I achieved a positive impact on my learning”.
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Madina Garcia provided a comment, “The disinfection and cleaning with the bases to form a professional and that learning will help us in the future”.
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Madina Garcia selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) Madina Garcia comment, “It was very interesting that I prepared myself for both disinfection and cleaning and learning is basic for future professionals and for when we obtain a pre-license or license”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(33) Comments from Anthony Calderon (survey responses were translated from Spanish to English as follows):**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Calderon selected “Extremely important”.
- 2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Calderon selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Calderon selected “No” and provided a comment “Because there are fewer hours and there would not be a way to resolve doubts and not everyone has the same compression capacity”.
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Calderon provided a comment, “the way to correctly disinfect my instruments step by step since I often skipped some steps because I didn’t know about it”.

5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Calderon selected "True, the safety and quality would be negatively impacted".
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Calderon comment, "To date the teachers have been very good at really explaining each topic in depth and making sure that everyone understood it 100%".

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(34) Comments from Isaias Roman Romero (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Romero selected "Extremely important".
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Romero selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Romero selected "No".
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Romero provided a comment, "To disinfect in a barbershop, it is important to clean and sterilized all tools and surfaces that come into contact with the client before each use".
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Romero selected "True, the safety and quality would be negatively impacted".
6. Share or comment on your experience in the pre-apprenticeship:

Romero comment, "the pre-learning experience has been excellent because I have shared it with all my classmates, and I have had a great time. I have enjoyed each and every one of the classes, the teacher has been very good to us because she teaches everything with a lot of patience and dedication, and we also have fun. I thank my teacher for everything she does for us always educating us to be excellent barbers".

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(35) Comments from Lithzy Adali Abril Macias (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Abril Macias selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Abril Macias selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Abril Macias selected “No” and provided a comment “No, because if you have a doubt, the teacher clarifies it at the moment”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Abril Macias provided a comment, “You give yourself confidence to work in the classroom by going to school knowing that you already have enough practice”.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Abril Macias selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Abril Macias comment, “Very good experience since the teacher explains and clarifies all doubts”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(36) Comments from Maria Sosa (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Sosa selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?

- a) Sosa selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Sosa selected “No” and provided a comment “Being interacted in person answers doubt that my exist at that moment”.
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Sosa provided a comment, “To be able to practice at the moment the application and new hair styling techniques and be able to work on them at the moment with technical knowledge and practice, the same in preparation of chemicals”.
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Sosa selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on your experience in the pre-apprenticeship:
  - a) Sosa did not share additional comments.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(37) Comments from Jessica Lizzettee Rios Nuñez (survey responses were translated from Spanish to English as follows):**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Rios Nuñez selected “Extremely important”.
- 2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Rios Nuñez selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Rios Nuñez selected “No” and provided a comment “One pays more attention to a teacher who is in person”.
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Rios Nuñez provided a comment, “When cutting a client during a manicure he needs to follow the safety measures”.



5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Rios Nuñez selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Rios Nuñez comment, “I am completely satisfied. I feel totally capable in what I have learned”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(38) Comments from Yenifer Perez (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Perez selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Perez selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Perez selected “No” and provided a comment “No, it is not the same in person and being able to ask the teacher and he can answer our questions”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Perez provided a comment, “Disinfecting and sanitize our instruments and prevent spreading infections”.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Perez selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Perez comment, “For me I am more focused in a classroom than being in a place where I can easily get distracted”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(39) Comments from Emily Gomez (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Gomez selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Gomez selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Gomez selected “No” and provided a comment “When I do not understand the material being present and asking the instructor is essential for training”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Gomez provided a comment, “Disinfection and sanitizing the instruments to prevent infections and their spread”.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Gomez selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Gomez comment, “Being in person for me was very important simply because of the environment. Being at home where there are a thousand distractions is not the same as being in a classroom focused on learning”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(40) Comments from Yolanda Alcocer (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Alcocer selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Alcocer selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.

3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Alcocer selected "No" and provided a comment "Because this one will not resolve my doubts like a teacher who can guide me and give me an overview with many examples like me teacher does".
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Alcocer provided a comment, "Seeing every day feeling and working with different types of hair and texture, asking my instructor and the owner of the salon on how to manage and observing my boss and the teacher are experiences that is not going to help me".
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Alcocer selected "True, the safety and quality would be negatively impacted".
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Alcocer comment, "one day a client came in and wanted a color touch-up, where she had a discoloration, so the owner of the salon suggested she wait since she had very little growth, not enough to perform the procedure. The person left angry with the cost that was not appropriate for the client. The owner remained firm and decided not to carry out the procedure. I was surprised by his kindness and firmness. This was a great experience for me".

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(41) Comments from Ana Lila Vega (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Vega selected "Extremely important".
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Vega selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Vega selected "No" and provided a comment "Because they can't answer my questions".

4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Vega provided a comment, "Work with a professional, consult with the clients and how to deal with problems in the salon specific to the client".
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Vega selected "True, the safety and quality would be negatively impacted".
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Vega comment, "Learning comes from various sources, both from books and teachers and the opinions or experience of the students themselves".

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(42) Comments from Adriana Rosas Gonzalez (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Rosas Gonzalez selected "Extremely important".
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Rosas Gonzalez selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Rosas Gonzalez selected "No" and provided a comment "Because it is important to ask direct questions to the teacher for a complete understanding".
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Rosas Gonzalez provided a comment, "To resolve any situation with chemical products, consults with clients etc.".
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Rosas Gonzalez selected "True, the safety and quality would be negatively impacted".
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Rosas Gonzalez comment, "The teacher clarifies any doubts on any topic".

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(43) Comments from Cynthia Arredando Nuñez (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Arredando Nuñez selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Arredando Nuñez selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Arredando Nuñez selected “No” and provided a comment “It is important to interact and ask the teacher for the correct information that cannot be answered in the video”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Arredando Nuñez provided a comment, “the practical experience is always the reality of any problem in the hair, scalp, skin nails including work material due to the technological difference or on mannequins, which does not present the importance of the activating the right techniques”.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Arredando Nuñez selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Arredando Nuñez no comment.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(44) Comments from Jeannette Quinonez (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Quinonez selected “Extremely important”.

2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Quinonez selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Quinonez selected "No" and provided a comment "Because it will not resolve my doubts as with a qualified teacher".
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Quinonez provided a comment, "To work with professional line, to treat all types of hair, and resolve real situations in the hair with clients from washing the hair to how to dry it and plan to apply products".
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Quinonez selected "True, the safety and quality would be negatively impacted".
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Quinonez no comment.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(45) Comments from Lizbeth Argujo Pulido (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Argujo Pulido selected "Extremely important".
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Argujo Pulido selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Argujo Pulido selected "No" and provided a comment "A video will never replace a class".
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:



- a) Argujo Pulido provided a comment, “to know how to do a correct procedure with bleach or a client could need a corrector procedure thanks to my knowledge”.
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Argujo Pulido selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) Argujo Pulido comment, “The teachers always resolve doubts before practicing it in a salon”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(46) Comments from Olga Coronel Palanco (survey responses were translated from Spanish to English as follows):**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Coronel Palanco selected “Extremely important”.
- 2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Coronel Palanco selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Coronel Palanco selected “No” and provided a comment “I wouldn’t confidently understand”.
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Coronel Palanco provided a comment, “Each topic discussed in the classroom is of utmost importance in knowledge and understanding”.
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Coronel Palanco selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) Coronel Palanco comment, “I have gained more still in the entire area of cosmetology thanks to the safety and quality practices in the classroom”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(47) Comments from Alejandra Reyes M (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Reyes M selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Reyes M selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Reyes M selected “No” and provided a comment “In-person learning gives me more knowledge and confidence in customer service”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Reyes M provided a comment, “The practices and advice from the teacher and colleagues make me feel more confident to practice in the salon”.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Reyes M selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Reyes M comment, “Coming to school helps me to practice and share our knowledge when doing any type of work in the classroom and thus feeling more confident when doing it in person”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(48) Comments from Jocelyn Saldana (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Saldana selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Saldana selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.

3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Saldana selected “No” and provided a comment “Since as a group we also resolve doubts, and an instructor has a broader perspective since they have had different experiences and can advise more”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Saldana provided a comment, “Since everything is new and we do not know how to work in a salon, the experience of the instructors is extremely important since it helps us to have a broader perspective regarding working in the salon”.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Saldana selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Saldana comment, “It has helped me a lot to listen to the instructors experiences as it helps me feel more confident when working in the salon”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(49) Comments from Veronica Astorga (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Astorga selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Astorga selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Astorga selected “No” and provided a comment “Especially when you have the obligation to come to school and comply with the schedule and therefore you can focus more and if you have questions you can ask”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:

- a) Astorga provided a comment, “There are many basic steps that are in the book, that they don’t teach you in the salon”.
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Astorga selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) Astorga comment, “I can learn from my classmates and my teachers”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(50) Comments from Yiny Muñoz (survey responses were translated from Spanish to English as follows):**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Muñoz selected “Extremely important”.
- 2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Muñoz selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Muñoz selected “No” and provided a comment “I don’t like videos, but I will provide the same information and confidence by having someone who will explain this to you and yes with greater experience”.
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Muñoz provided a comment, “The teacher will share her experiences, methods and knowledge which are quite important when working in the salon and their tips”.
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Muñoz selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) Muñoz comment, “For me it is very important to go to class to focus on what I don’t know with the guidance of the teacher, his experience and practices by having someone who can help and teach me in person, questions and doubts and knowledge”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(51) Comments from Guadalupe Cuellar (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Cuellar selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Cuellar selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Cuellar selected “No” and provided a comment “No, it is not the same thing to be watching a pre-recorded video as it is to have a teacher there to explain any doubts about learning in class”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Cuellar provided no comment.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Cuellar selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Cuellar comment, “face to face classes help more easily to learn in class and in practice to prepare in everything”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(52) Comments from Karina Martinez (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Martinez selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?

- a) Martinez selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Martinez selected “No” and provided a comment “I can’t ask questions”.
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Martinez provided a comment, “The knowledge the school has given me gives me confidence in the salon”.
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Martinez selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) Martinez comment, “If you don’t understand something, the teachers can repeat the information to you again and you can also learn from other people in class”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(53) Comments from Valeria Denise Cerda Soria (survey responses were translated from Spanish to English as follows):**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Cerda Soria selected “Extremely important”.
- 2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Cerda Soria selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Cerda Soria selected “No” and provided a comment “Because we will not be able to resolve our doubts and I would not learn as well”.
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Cerda Soria provided a comment, “I learn day by day even more than what I am learning in classes because I improve my knowledge more accompanied by experts in the business”.



5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Cerda Soria selected "True, the safety and quality would be negatively impacted".
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Cerda Soria comment, "I learn a lot in other matters such as hair, nails, eyelashes, and others because I like what they are teaching consistently. It is always best to go to school, you learn more and also by going to work in the salon, we become experts and have more knowledge in the area".

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(54) Comments from Maria Dolores Garcia Ruciles (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Garcia Ruciles selected "Extremely important".
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Garcia Ruciles selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Garcia Ruciles selected "No".
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Garcia Ruciles provided a comment, "The information that a peroxide with more than 40 vol. can cause serious damage to the clients hair and skin."
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Garcia Ruciles selected "True, the safety and quality would be negatively impacted".
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Garcia Ruciles provided no comment.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(55) Comments from Yusef Aguilar Ramirez (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Aguilar Ramirez selected "Extremely important".
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Aguilar Ramirez selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Aguilar Ramirez selected "No".
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Aguilar Ramirez provided no comment.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Aguilar Ramirez selected "True, the safety and quality would be negatively impacted".
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Aguilar Ramirez comment, "For me, the fundamental classes are very important because they can clear up any doubts regarding the topics".

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(56) Comments from Deymi Yutzi Aguila Ortiz (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Aguila Ortiz selected "Extremely important".
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Aguila Ortiz selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Aguila Ortiz selected "No" and provided a comment "No, because a video cannot replace practice".

4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Aguila Ortiz provided a comment, "The proper use of work tools, customer care and health".
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Aguila Ortiz selected "True, the safety and quality would be negatively impacted".
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Aguila Ortiz comment, "In my experience it was an introduction to how to ensure the clients health. They also gave us information about organizations that protect us as the workers".

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(57) Comments from Jaan Carlos Delgado Hernandez (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Delgado Hernandez selected "Extremely important".
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Delgado Hernandez selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Delgado Hernandez selected "No".
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Delgado Hernandez provided a comment, "Permanent / client care / infections".
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Delgado Hernandez selected "True, the safety and quality would be negatively impacted".
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Delgado Hernandez comment, "Very good".

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(58) Comments from Maria Diaz Torres (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Diaz Torres selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Diaz Torres selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Diaz Torres selected “No” and provided a comment “Because the explanations are broader and with examples”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Diaz Torres provided a comment, “Cleaning disinfection and sterilization because a client has skin infection”.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Diaz Torres selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Diaz Torres comment, “Very good! The books and explanations are very good, you learn from the most basic to the most important”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(59) Comments from Rolin Sainvil (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Sainvil selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?

- a) Sainvil selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Sainvil selected “No” and provided a comment “Cleaning and disinfecting of tools and cutting hair”.
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Sainvil provided no comment.
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Sainvil selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on you experience in the pre-apprenticeship:
  - a) Sainvil comment, “To learn quickly to practice hair”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(60) Comments from Patricia Garcia (survey responses were translated from Spanish to English as follows):**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Garcia selected “Extremely important”.
- 2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Garcia selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Garcia selected “No”.
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Garcia provided a comment, “The proper way to disinfect our work tools”.
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Garcia selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on you experience in the pre-apprenticeship:

- a) Garcia comment, “It has prepared me more about the rules and what I should do in my salon, starting with cleanliness and the proper way to work in my work area”.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(61) Comments from Jose David Servin Hernandez (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Servin Hernandez selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Servin Hernandez selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Servin Hernandez selected “No” and provided a comment “Because a 2hr video cannot replace an explanation and topics that take 3 hours”.
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Servin Hernandez provided a comment, “I learned to disinfection and cleaning system that I had no knowledge of how to do”.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Servin Hernandez selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Servin Hernandez provided no comment.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(62) Comments from Ariadna Alvarado (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Alvarado selected “Extremely important”.



2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Alvarado selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Alvarado selected “No” and provided a comment “Because in class they can resolve doubts that you have in that moment.”
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Alvarado provided a comment, “I have learned about women’s services like some haircuts”.
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Alvarado selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Alvarado provided no comment

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(63) Comments from Alejandra Rivera (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Rivera selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Rivera selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Rivera selected “No.”
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Rivera provided a comment, “I didn’t know that peroxide over 40 was illegal and can cause damage”.

5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - b) Rivera selected "True, the safety and quality would be negatively impacted".
6. Share or comment on your experience in the pre-apprenticeship:
  - b) Rivera comment, "I can learn from my instructors and trainer and also my classmates."

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(64) Comments from Isis Gutierrez Lara (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Gutierrez Lara selected "Extremely important".
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Gutierrez Lara selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - b) Gutierrez Lara selected "No" and provided a comment, "It is better to acquire knowledge in a certain amount of time so that you can learn better and not become saturated with information."
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Gutierrez Lara provided a comment, "I learned that I can't use talc powders and I used them before."
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Gutierrez Lara selected "True, the safety and quality would be negatively impacted".
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Gutierrez Lara provided no comment.

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(65) Comments from Liliana Garcia Tejeda (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Garcia selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Garcia selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Garcia selected “No” and provided a comment, “for the feedback of the questions.”
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Garcia provided a comment, “In addition to the situations suggested by the instructor, it occurred and I already knew what to do thanks to his examples.”
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Garcia selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on your experience in the pre-apprenticeship:
  - a) Garcia comment, “practice in a supervised environment helped me feel more confident.”

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(66) Comments from Yolanda L. Chaves R. (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Chaves R. selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Chaves R. selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?

- a) Chaves R. selected “No.”
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Chaves R. provided a comment, “Yes, of course, when one does not understand they explain to us the same for a chemical application it is better for them to explain and teach us so that we can do the right thing for the client.”
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Chaves R. selected “True, the safety and quality would be negatively impacted”.
- 6. Share or comment on your experience in the pre-apprenticeship:
  - a) Chaves R. comment, “I like to have an instructor for anything we don’t understand, they explain to us and show us the facts way better than a video.”

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

**(67) Comments from Jorge E. Solis Garcia (survey responses were translated from Spanish to English as follows):**

- 1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Solis Garcia selected “Extremely important”.
- 2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Solis Garcia selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
- 3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Solis Garcia selected “No” and provided a comment, “It is better in person because in the video it doesn’t give the same corresponding seriousness.”
- 4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Solis Garcia provided a comment, “In terms of cleanliness and order, it has to have labels and everything put in its space.”
- 5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Solis Garcia selected “True, the safety and quality would be negatively impacted”.

6. Share or comment on you experience in the pre-apprenticeship:
  - a) Solis Garcia comment, "When it comes to safety and hygiene, the learning I acquired was extremely important."

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(68) Comments from Felipe Flores (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Flores selected "Extremely important".
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Flores selected "No, a pre-recorded video would not effectively replace hands-on practice and live feedback".
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - a) Flores selected "No" and provided a comment, "The guidance of a teacher is very important since we can ask questions and practice in the moment of doubt, personally it was very helpful to me."
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Flores provided a comment, "I had trouble identifying the OSHA Department and the teacher told me that each acronym means something like that I learned it."
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - a) Flores selected "True, the safety and quality would be negatively impacted".
6. Share or comment on you experience in the pre-apprenticeship:
  - a) Flores comment, "This program I have learned many safely measures that I thought had mastered in face to face class. They teach us the correct way to carry out safely measures and we can learn more effectively than in a video."

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the "General Response to All Survey Input" noted above.

**(69) Comments from Vicky Gonzalez (survey responses were translated from Spanish to English as follows):**

1. How important was hands-on experience and real-time instructor feedback during your pre-apprenticeship training in helping you feel confident and prepared for salon work?
  - a) Gonzalez selected “Extremely important”.
2. Do you believe the key aspects of pre-apprentice training such as live instructor explanations and feedback can be effectively replaced by a pre-recorded video?
  - a) Gonzalez selected “No, a pre-recorded video would not effectively replace hands-on practice and live feedback”.
3. Do you feel that a 2-hour pre-recorded video would have provided you with the same level of understanding and skill as the 39-hour in-person pre-apprentice training?
  - b) Gonzalez selected “No” and provided a comment, “Because in a video class you don’t learn the same as in a face to face class, where you can ask questions directly to the teacher and have the teacher advise and correct you.”
4. Can you share an example of a situation in your current salon or barbershop work where knowledge from the in-person pre-apprentice training was crucial to your performance or safety:
  - a) Gonzalez provided a comment, “its good because they don’t teach you how to give better customer service and how to keep everything clean for the clients.”
5. If in-person training were removed, do you believe the safety and quality of work in the beauty industry would be negatively impacted?
  - b) Gonzalez selected “True, the safety and quality would be negatively impacted”.
6. Share or comment on you experience in the pre-apprenticeship:
  - b) Gonzalez comment, “Everything is good but there should be a fewer hours that we have to do in a salon for a license, since we already do 3200 hours it is too much which I consider they should give you the license.”

**Response:** The Board acknowledges the comment but makes no further edits to the text for the reasons set forth in the “General Response to All Survey Input” noted above.

### **Consideration of Alternatives**

No reasonable alternative which was considered or that has otherwise been identified and brought to the attention of the Board as part of public comments received or at the Board’s meetings would be more effective in carrying out the purpose for which the regulation is proposed, or would be as effective and less burdensome to affected private persons than the adopted regulation, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law. All recommendations provided during this rulemaking were considered by the Board and rejected as discussed herein.