

**From:** [BPL-BoardSupport](#)  
**To:** [Marks, Dena \(LARA\)](#)  
**Subject:** FW: Rules that need to be revisited  
**Date:** Tuesday, May 18, 2021 6:56:15 AM  
**Attachments:** [Public Comment of the Cosmetology - General Rules May 2021.docx](#)

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**From:** Katherine Pavlik <[kpavlik@mcbtroy.com](mailto:kpavlik@mcbtroy.com)>  
**Sent:** Monday, May 17, 2021 4:57 PM  
**To:** BPL-BoardSupport <[BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)>  
**Subject:** Rules that need to be revisited

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Here is a copy of the rules I mentioned in today's meeting that we would like to have revisited. Also, another question was brought up about shampoo bowls in classrooms. Is it necessary to have a shampoo bowl in a classroom that teaches manicuring or esthetics and not cosmetology?

Thank You,  
Kathy Pavlik

## Public Comment of the Cosmetology – General Rules

R338.2171a (h) p2: please clarify the required grade level. Is it still 9<sup>th</sup> grade? The new rule does not state the required grade.

R338.2171a (k) p2: the definition for Minimum Practical Applications has been removed however Minimum Practical Applications is still found in the curriculum tables of the rules. The definition needs to be put back in. I do agree with a definition for practical hours, but believe practical applications needs to remain.

R338.2121a p3: when will information/bulletins for the new NBCP examination be available and will there be a meeting and/or training on the new examination?

R338.2180 (10b) p7: can a copy of the emailed license be used in the school locations that are apart from the main school premises?

R338.2132 (d) p8: does the shampoo bowl have to be in the actual classroom, or can it be in the main building, shared by more than one classroom?

R338.2136 (2)(b) p9: minimum practical applications were removed here but are still required in the curriculum table. Minimum practical applications should be put back into this rule.

R338.2137 Rule 37 (1) p9: A school no longer must furnish a copy of the act and rules to students? Does a school have to at least give the students the direct link to the act and rules? Or are they no longer going to be tested on this?

R338.2139 Rule 39 (1) p10: There is no longer a passing score requirement for a student in school? Is the passing score now decided by each individual school? Or will it be the same as the new NBCP examination when we find out what that is?

R338.2169a Rule 69a Table 11, p24-26, Table 13, p27-28, Table 14, p27-29:  
Table 11: Cosmetology students now only have 75 theory hours in health and safety related to hair care services, manicuring services, skin care services, and natural hair cultivation that include: anatomy and physiology. Chemical safety. Diseases and disorders. Laws and rules. Occupational safety. Personal hygiene. Sanitation. Equipment supply, and tool safety. This is not enough hours for this

much important information, especially when including hair, skin, nails, and natural hair cultivation. 125 practical hours is way too many for this area. In subject (b): hair care services, there are 15 (xv) topics with 200 theory hours, 600 practical hours and 425 minimum practical applications. Whereas there are 4 (iv) topics in Esthetic services and 3(iii) in Manicuring services with 100 theory hours, 150 practical hours, and 25 minimum practical applications in both esthetics and manicuring. When you do the math that gives a student a minimum 1.41 hours to complete 1 hair application and a minimum of 6 hours to complete 1 esthetic application and a minimum of 6 hours to complete 1 manicuring application. I think that a minimum of 6 hours is way too much time to complete a esthetic or manicuring application and a minimum of 1.41 hours is not nearly enough time to complete most hair applications. In comparison to esthetics and manicuring having 3.5 hours to complete 1 application. I believe that more practical hours need to be put back into hair care services.

The Esthetic services theory hours is now 100 and the Manicuring Services theory hours is now 100. When we do the math of 15 (xv) cosmetology topics with 200 theory hours, a student will spend 13.33 hours per topic in hair services, 25 hours per topic in esthetic services (100 theory hours and 4 topics), and 33.33 hours per topic in manicure services (100 hours and 3 topics). When researching in the Pivot Point cosmetology textbook there is approximately 37 hours in skin and 34 hours in nails. It will be very difficult for a school to teach 100 hours of theory with a traditional cosmetology textbook, without having to also include an esthetic and manicuring textbook into the student kit and book fee.

Overall, when looking at the new revised version of the cosmetology curriculum it does not make sense to spend more theory and practical hours in skin and manicuring services and less in hair services. Many hair services require more technical knowledge and skill and overall time to complete then skin and manicuring services. Not to mention the majority of cosmetology students want to learn hair services with all the new trendy cut and color techniques and textured hair. I definitely believe this curriculum needs to be relooked and more balanced.

R338.2171 Rulen71 (e) p33: What if a school or salon buys disinfectants by the gallon and dilute it into a small container? How will they comply with the manufacturer label requirement?

Rule 71a (1)(b)(i) p34: do manicuring tools now need to be in a wet sanitizer that fully covers them? Most manicure disinfecting jars submerge the working surfaces and not the handles. Is this no longer allowed?



Rule 71a (4) p34: how do we comply with 160°F water temperature in wash and rinse cycle? How will inspectors check this?

Rule 71b (b) p35: hands should be sanitized prior to hair care services as well especially now with COVID.