



COLORADO

**Department of
Regulatory Agencies**

Colorado Office of Policy, Research &
Regulatory Reform

2025 Sunset Review

Barber and Cosmetologist Act



October 15, 2025



COLORADO

**Department of
Regulatory Agencies**

Executive Director's Office

October 15, 2025

Members of the Colorado General Assembly
c/o the Office of Legislative Legal Services
State Capitol Building
Denver, Colorado 80203

Dear Members of the General Assembly:

The Colorado General Assembly established the sunset review process in 1976 as a way to analyze and evaluate regulatory programs and determine the least restrictive regulation consistent with the public interest. Pursuant to section 24-34-104(5)(a), Colorado Revised Statutes (C.R.S.), the Colorado Office of Policy, Research and Regulatory Reform (COPRRR) at the Department of Regulatory Agencies (DORA) undertakes a robust review process culminating in the release of multiple reports each year on October 15.

A national leader in regulatory reform, COPRRR takes the vision of their office, DORA and more broadly of our state government seriously. Specifically, COPRRR contributes to the strong economic landscape in Colorado by ensuring that we have thoughtful, efficient, and inclusive regulations that reduce barriers to entry into various professions and that open doors of opportunity for all Coloradans.

As part of this year's review, COPRRR has completed an evaluation of the Barber and Cosmetologist Act. I am pleased to submit this written report, which will be the basis for COPRRR's oral testimony before the 2026 legislative committee of reference.

The report discusses the question of whether there is a need for the regulation provided under Article 105 of Title 12, C.R.S. The report also discusses the effectiveness of the Director of the Division of Professions and Occupations in carrying out the intent of the statutes and makes recommendations for statutory changes for the review and discussion of the General Assembly.

To learn more about the sunset review process, among COPRRR's other functions, visit coprrr.colorado.gov.

Sincerely,

Patty Salazar
Executive Director





Barber and Cosmetologist Act

Background

What is regulated?

The Barber and Cosmetologist Act (Act), regulates barbers, cosmetologists, estheticians, hairstylists, and nail technicians, and requires them to obtain a license in order to provide services in Colorado. Places of businesses where such services are provided must secure a registration to operate.

Why is it regulated?

Regulation ensures that barbers, cosmetologists, estheticians, hairstylists, and nail technicians possess basic competence and provides the public an avenue to file complaints against incompetent individuals and businesses. The Act also provides protection to consumers related to the transmission of communicable diseases and bacterial infections.

Who is regulated?

In fiscal year 23-24, there were a total of 71,060 individuals licensed, and 580 businesses registered under the Act.

How is it regulated?

The Director of the Division of Professions and Occupations (Director) within the Colorado Department of Regulatory Agencies is vested with the authority to regulate barbers, cosmetologists, estheticians, hairstylists, nail technicians, and businesses where such services are provided. Also, a Barber and Cosmetology Advisory Committee (Advisory Committee) was created to assist the Director in addressing regulatory issues such as policy issues and changes, and additions or amendments to the Barber and Cosmetology rules.

In order to qualify for a license, applicants must present proof of graduation from an approved beauty or barber school, pass written and practical examinations, and pay a fee. Businesses need only submit an application and pay a fee.

What does it cost?

In fiscal year 23-24, the total expenditures for the oversight of licensees and businesses were \$1,496,292. There were 2.88 full-time equivalent employees associated with this regulatory oversight.

What disciplinary activity is there?

In fiscal years 19-20 through 23-24, the Director took a total of 2,371 disciplinary actions against individuals and businesses regulated under the Act, including citations, letters of admonition, revocations, stipulations, and cease-and-desist orders.

Key Recommendations

- Continue the Barber and Cosmetologist Act for 11 years, until 2027.
- Sunset the Advisory Committee.
- Update definitions for license types in the Act.

Table of Contents

Background	2
Sunset Criteria.....	2
Sunset Process	4
Methodology	5
Profile of the Professions.....	6
Legal Framework.....	8
History of Regulation	8
Legal Summary	9
Advisory Committee.....	10
Regulated Occupations	11
Business Registration	14
Cleaning and Disinfection Rules	14
Complaints and Enforcement	15
Services that May Be Provided with Additional Training	16
Program Description and Administration	17
Licensing	21
Examination.....	24
Complaints	30
Disciplinary Activity.....	31
Collateral Consequences - Criminal Convictions.....	32
Inspections	33
Analysis and Recommendations.....	35
Recommendation 1 – Continue the Barber and Cosmetologist Act for 11 years, until 2037.	35
Recommendation 2 – Sunset the Advisory Committee.	37
Recommendation 3 – Update the definitions for certain license types in the Act..	38
Recommendation 4 – Clarify the language regarding exemptions from the Act. ...	38
Recommendation 5 – Make a technical amendment to the Act.	39
Appendix A – Complaints by License Type	40
Appendix B – Disciplinary Actions by License Type.....	43

Background

Sunset Criteria

Enacted in 1976, Colorado's sunset law was the first of its kind in the United States. A sunset provision repeals all or part of a law after a specific date, unless the legislature affirmatively acts to extend it. During the sunset review process, the Colorado Office of Policy, Research and Regulatory Reform (COPRRR) within the Department of Regulatory Agencies (DORA) conducts a thorough evaluation of such programs based upon specific statutory criteria¹ and solicits diverse input from a broad spectrum of stakeholders including consumers, government agencies, public advocacy groups, and professional associations.

Sunset reviews are guided by statutory criteria and sunset reports are organized so that a reader may consider these criteria while reading. While not all criteria are applicable to all sunset reviews, the various sections of a sunset report generally call attention to the relevant criteria. For example,

- In order to address the first criterion and determine whether the program under review is necessary to protect the public, it is necessary to understand the details of the profession or industry at issue. The Profile section of a sunset report typically describes the profession or industry at issue and addresses the current environment, which may include economic data, to aid in this analysis.
- To address the second sunset criterion--whether conditions that led to the initial creation of the program have changed--the History of Regulation section of a sunset report explores any relevant changes that have occurred over time in the regulatory environment. The remainder of the Legal Framework section addresses the fifth sunset criterion by summarizing the organic statute and rules of the program, as well as relevant federal, state and local laws to aid in the exploration of whether the program's operations are impeded or enhanced by existing statutes or rules.
- The Program Description section of a sunset report addresses several of the sunset criteria, including those inquiring whether the agency operates in the public interest and whether its operations are impeded or enhanced by existing statutes, rules, procedures and practices; whether the agency or the agency's board performs efficiently and effectively and whether the board, if applicable, represents the public interest.
- The Analysis and Recommendations section of a sunset report, while generally applying multiple criteria, is specifically designed in response to the fourteenth criterion, which asks whether administrative or statutory changes are necessary to improve agency operations to enhance the public interest.

¹ Criteria may be found at § 24-34-104, C.R.S.

These are but a few examples of how the various sections of a sunset report provide the information and, where appropriate, analysis required by the sunset criteria. Just as not all criteria are applicable to every sunset review, not all criteria are specifically highlighted as they are applied throughout a sunset review. While not necessarily exhaustive, the table below indicates where these criteria are applied in this sunset report.

Table 1
Application of Sunset Criteria

Sunset Criteria	Where Applied
(I) Whether regulation or program administration by the agency is necessary to protect the public health, safety, and welfare.	• Profile of the Profession • History of Regulation • Recommendations 1 and 2
(II) Whether the conditions that led to the initial creation of the program have changed and whether other conditions have arisen that would warrant more, less, or the same degree of governmental oversight.	• History of Regulation
(III) If the program is necessary, whether the existing statutes and regulations establish the least restrictive form of governmental oversight consistent with the public interest, considering other available regulatory mechanisms.	• Legal Framework • Recommendation 4
(IV) If the program is necessary, whether agency rules enhance the public interest and are within the scope of legislative intent.	• Legal Framework
(V) Whether the agency operates in the public interest and whether its operation is impeded or enhanced by existing statutes, rules, procedures, and practices and any other circumstances, including budgetary, resource, and personnel matters.	• Legal Framework • Program Description and Administration
(VI) Whether an analysis of agency operations indicates that the agency or the agency's board or commission performs its statutory duties efficiently and effectively.	• Program Description and Administration
(VII) Whether the composition of the agency's board or commission adequately represents the public interest and whether the agency encourages public participation in its decisions rather than participation only by the people it regulates.	• Legal Framework • Program Description and Administration
(VIII) Whether regulatory oversight can be achieved through a director model.	• Not Applicable
(IX) The economic impact of the program and, if national economic information is not available, whether the agency stimulates or restricts competition.	• Profile of the Profession

Sunset Criteria	Where Applied
(X) If reviewing a regulatory program, whether complaint, investigation, and disciplinary procedures adequately protect the public and whether final dispositions of complaints are in the public interest or self-serving to the profession or regulated entity.	- Complaint Activity - Disciplinary Activity
(XI) If reviewing a regulatory program, whether the scope of practice of the regulated occupation contributes to the optimum use of personnel.	- Licensing - Examinations
(XII) Whether entry requirements encourage equity, diversity, and inclusivity.	Program Description and Administration
(XIII) If reviewing a regulatory program, whether the agency, through its licensing, certification, or registration process, imposes any sanctions or disqualifications on applicants based on past criminal history and, if so, whether the sanctions or disqualifications serve public safety or commercial or consumer protection interests. To assist in considering this factor, the analysis prepared pursuant to subsection (5)(a) of this section must include data on the number of licenses, certifications, or registrations that the agency denied based on the applicant's criminal history, the number of conditional licenses, certifications, or registrations issued based upon the applicant's criminal history, and the number of licenses, certifications, or registrations revoked or suspended based on an individual's criminal conduct. For each set of data, the analysis must include the criminal offenses that led to the sanction or disqualification.	Collateral Consequences
(XIV) Whether administrative and statutory changes are necessary to improve agency operations to enhance the public interest.	Recommendations 1 through 5

Sunset Process

Regulatory programs scheduled for sunset review receive a comprehensive analysis. The review includes a thorough dialogue with agency officials, representatives of the regulated profession and other stakeholders. Anyone can submit input on any upcoming sunrise or sunset review on COPRRR's website at coprrr.colorado.gov.

The functions of the Barber and Cosmetology Program and the Director of the Division of Professions and Occupations (Director and Division, respectively), as enumerated in Article 105 of Title 12, Colorado Revised Statutes (C.R.S.), shall terminate on September 1, 2026, unless continued by the General Assembly. During the year prior to this date, it is the duty of COPRRR to conduct an analysis and evaluation of the Barber and Cosmetology Program pursuant to section 24-34-104, C.R.S.

The purpose of this review is to determine whether the currently prescribed regulation should be continued and to evaluate the performance of the Director. During this review, the Director must demonstrate that the program serves the public interest. COPRRR's findings and recommendations are submitted via this report to the Office of Legislative Legal Services.

Methodology

As part of this review, COPRRR staff interviewed Division staff, practitioners, and officials with state and national professional associations; Colorado statutes and rules, and the laws of other states.

The major contacts made during this review include, but are not limited to:

- Career Education Colleges and Universities
- Department of Corrections
- Department of Higher Education
- Division of Professions and Occupations
- National Institute Council of State Boards of Cosmetology
- Pickens Technical College
- Cuttin' Up Beauty Academy
- Westland Beauty Academy
- Ulta Salon Cosmetics and Fragrance
- The White Magnolia Day Spa
- Great Clips
- Pueblo Community College
- Kantor and Company
- Emily Griffith Technical College

Profile of the Professions

In a sunset review, the Colorado Office of Policy, Research and Regulatory Reform (COPRRR) is guided by the sunset criteria located in section 24-34-104(6)(b), C.R.S. The first criterion asks whether regulation or program administration by the agency is necessary to protect the public health, safety, and welfare.

To understand the need for regulation, it is first necessary to recognize what the profession does, where they work, who they serve and any necessary qualifications.

During the 1920s and 1930s, the movie industry and the increase in beauty culture, contributed to the beauty industry beginning to thrive in the United States. Consequently, beauty schools began to form across the country and offered training in hairdressing, makeup and other various beauty services.²

There are a variety of professions included in the beauty industry such as:

- Barbers,
- Cosmetologists,
- Estheticians,
- Hairstylists, and
- Nail technicians.

Barbers perform certain services, including, but not limited to: cutting, coloring and chemically treating hair. Barbers also perform a range of other services such as beard trims, shaving, and scalp treatments.³

Cosmetologists are trained to perform services such as cosmetic treatments to the hair, skin and nails. Certain services include, but are not limited to cutting, coloring and chemically treating hair, hair removal, nail and skin care, skin and hair analysis, wellness and spa treatments, fashion trends as well as various makeup specialties.⁴

Estheticians are skincare professionals who provide services to consumers. Specifically, estheticians provide cosmetic treatments such as facials, exfoliation, hair removal and makeup application.⁵ Essentially, estheticians focus on enhancing the skin's tone, texture and overall vitality while addressing issues such as sun damage and aging.⁶

² The Salon Professional Academy. *The History of Cosmetology School: A Look Back*. Retrieved July 3, 2025, from https://www.tspacoloradosprings.com/blog/the-history-of-cosmetology-school-a-look-back/?utm_campaign=fmsOrganic&mid=2839

³ Career Explorer. *What does a Barber Do?* Retrieved July 3, 2025, from <https://www.careerexplorer.com/careers/barber/>

⁴ Douglas J Aveda Institute. *What is a Cosmetologist?* Retrieved July 3, 2025, from <https://douglasj.edu/what-is-a-cosmetologist/>

⁵ Very Well Health. *Esthetician: What They Do, How to Become One, and Salaries*. Retrieved July 3, 2025, from <https://www.verywellhealth.com/what-is-an-esthetician-15764>

⁶ Very Well Health. *Esthetician: What They Do, How to Become One, and Salaries*. Retrieved July 3, 2025, from <https://www.verywellhealth.com/what-is-an-esthetician-15764>

Estheticians are not limited to providing treatments to the facial area, instead they are able to provide skin treatments in areas such as the neck and body.⁷

Hairstylists, as the title implies, are trained to style hair. Other services hairstylists provide include, but are not limited to, cutting, coloring, and chemically treating hair. Hairstylists also stay updated on current styling trends for their customers.⁸

Nail technicians specialize in the care and beautification of finger and toe nails. They provide a variety of services including manicures, pedicures and nail enhancements.⁹

To be licensed in any of these professions, one must complete specified training and pass an examination.

The ninth sunset criterion requires COPRRR to evaluate the economic impact of regulation. One way this may be accomplished is to review the projected salary and growth of the profession.

The overall employment of barbers, cosmetologists and hairstylists is expected to grow five percent between 2024 and 2034. One reason for the expected growth is the need to replace workers who transfer to different occupations or retire.¹⁰ As of May 2024, the median hourly wage for barbers was \$18.73, cosmetologists' and hairstylists' median hourly wage was \$16.95.¹¹

The employment of nail technicians is expected to grow seven percent between 2024 and 2034. One reason for the expected growth is the need to replace workers who transfer to different occupations or retire.¹² As of May 2024, the median hourly wage for nail technicians was \$16.66.¹³

⁷ Very Well Health. *Esthetician: What They Do, How to Become One, and Salaries*. Retrieved July 3, 2025, from <https://www.verywellhealth.com/what-is-an-esthetician-15764>

⁸ Lush Hair Folk. *What Does a Hairstylist Do?* Retrieved July 3, 2025, from https://lush-hair-folk.com/what-does-a-hairstylist-do/?srsltid=AfmBOooMn7cyQzDt7SM2TRMJwSR2LaDLRF52Fmk38qUnaGuq1EFg_NJ

⁹ Career Explorer. *What Does a Nail Technician do?* Retrieved July 3, 2025, from <https://www.careerexplorer.com/careers/nail-technician/>

¹⁰ U.S. Bureau of Labor and Statistics. *Occupational Outlook Handbook - Barbers, Hairstylists, and Cosmetologists*. Retrieved July 3, 2025, from <https://www.bls.gov/ooh/personal-care-and-service/barbers-hairstylists-and-cosmetologists.htm#tab-6>

¹¹ U.S. Bureau of Labor and Statistics. *Occupational Outlook Handbook -Barbers, Hairstylists, and Cosmetologists*. Retrieved July 3, 2025, from <https://www.bls.gov/ooh/personal-care-and-service/barbers-hairstylists-and-cosmetologists.htm#tab-5>

¹² U.S. Bureau of Labor and Statistics. *Occupational Outlook Handbook -Manicurists and Pedicurists*. Retrieved July 3, 2025, from <https://www.bls.gov/ooh/personal-care-and-service/manicurists-and-pedicurists.htm#tab-6>

¹³ U.S. Bureau of Labor and Statistics. *Occupational Outlook Handbook -Manicurists and Pedicurists*. Retrieved July 3, 2025, from <https://www.bls.gov/ooh/personal-care-and-service/manicurists-and-pedicurists.htm#tab-5>

Legal Framework

History of Regulation

In a sunset review, the Colorado Office of Policy, Research and Regulatory Reform (COPRRR) is guided by the sunset criteria located in section 24-34-104(6)(b), Colorado Revised Statutes (C.R.S.). The first and second sunset criteria question:

Whether regulation or program administration by the agency is necessary to protect the public health, safety, and welfare; and

Whether the conditions that led to the initial creation of the program have changed and whether other conditions have arisen that would warrant more, less or the same degree of governmental oversight.

One way that COPRRR addresses this is by examining why the program was established and how it has evolved over time.

Colorado started regulating barbers in 1909, when the General Assembly created the Barber Board. In 1931, the General Assembly created the Cosmetology Board to regulate cosmetologists. Manicurists were regulated under the Cosmetology Board beginning in 1963.

In 1977, the General Assembly combined the two boards into a single State Board of Barbers and Cosmetologists (Board) and placed cosmeticians (now called estheticians) under the Board's regulatory authority. The new legislation also granted the Board the authority to establish minimum entry requirements for the occupations it oversaw.

In 1990, the General Assembly passed House Bill 90-1009, which granted the Board the power to issue letters of admonition and impose administrative fines. The bill also added language that explicitly required owners of shops—including barbershops, salons, and other similar places of business—to register with the Board. At the same time, the bill repealed the requirement that the Board conduct unannounced inspections of each registered shop at least once every three years, instituting instead a risk-based system, wherein the Board inspected only those businesses against which it had received a written complaint.

In 2000, the General Assembly passed House Bill 00-1179, which dissolved the Board and converted the licensing program into a director-model program, where all the licensing, enforcement, and policymaking authority rested with the Director of what is now the Division of Professions and Occupations (Director and Division, respectively). The bill required the Director to appoint a five-member Barber and Cosmetology Advisory Committee (Advisory Committee) to assist the Director in fulfilling their responsibilities. The bill also created a hairstylist license, which included in its scope of practice, the arranging and braiding of hair and the application of hair extensions.

Following the 2004 sunset review of the Barber and Cosmetologist Act (Act), the General Assembly passed Senate Bill 05-146. The bill renamed cosmeticians “estheticians”; expanded the scope of practice for manicurists to include the removal of hair on the leg up to the knee and on the arm up to the elbow; expanded the scope of hairstylists to include beard-trimming; and added language requiring the Advisory Committee to meet at least four times per year. The bill also changed how the length of education programs was calculated: previously, the minimum program length for each profession was articulated in clock hours. Senate Bill 146 converted the clock hours to credit hours. The bill also established a pathway to licensure by endorsement and repealed the section of the statute that explicitly required shops to register with the Director.

In 2006, the General Assembly granted the Director the authority to issue confidential letters of concern to licensees whose conduct does not warrant formal disciplinary action but might lead to serious consequences if not corrected.

In 2014, COPRRR conducted a sunset review of the Act. There were several recommendations included in the report, which were enacted by the General Assembly in the 2015 legislative session. Some recommendations enacted by the General Assembly included:

- Establishing as grounds for discipline failure to respond to a complaint,
- Clarifying that places of business must register with the Director and that the Director may take disciplinary action against registrants, and
- Reducing the number of times that the Advisory Committee must meet from four times a year to at least once a year.

Legal Summary

The third, fourth, fifth and seventh sunset criteria question:

Whether the existing statutes and regulations establish the least restrictive form of governmental oversight consistent with the public interest, considering other available regulatory mechanisms;

Whether agency rules enhance the public interest and are within the scope of legislative intent;

Whether the agency operates in the public interest and whether its operation is impeded or enhanced by existing statutes, rules, procedures, and practices and any other circumstances, including budgetary, resource, and personnel matters; and

Whether the composition of the agency’s board or commission adequately represents the public interest and whether the agency encourages public participation in its decisions rather than participation only by the people it regulates.

A summary of the current statutes and rules is necessary to understand whether regulation is set at the appropriate level and whether the current laws are impeding or enhancing the agency's ability to operate in the public interest.

The Act is created in section 12-105-101, *et seq.*, C.R.S. The purpose of the Act is to provide regulatory oversight of barbers, cosmetologists, estheticians, hairstylists, and nail technicians.

The Director is vested with the authority to enforce the Act.¹⁴ The Director's powers and duties include:¹⁵

- Promulgating rules that are necessary to enforce the Act;
- Investigating complaints, including entering premises where violations allegedly occurred;
- Upon receiving proof that a licensee has violated the statute or rules, revoking, suspending, or denying a license, or placing a licensee on probation and, if necessary, limiting the scope of practice of an applicant, licensee or registrant;
- Prescribing, with the approval of the Department of Public Health and Environment, safety and sanitary rules to protect the health and safety of the public;
- Supervising and regulating all licensees regulated under the Act, but nothing in the Act can be construed to abrogate the status, force or operation of public health laws or regulations in Colorado;
- Investigating, upon the Director's initiative or when a complaint is received, all suspected or alleged violations of the Act, unless the Director determines complaints or alleged violations are without merit, and to enter the premises in which violations are alleged to have occurred during business hours;
- Establishing criteria that applicants must meet to take the licensing examinations;
- Applying for an order enjoining any act or practice that constitutes a violation of the Act; and
- Issuing cease and desist orders, letters of admonition, and letters of concern.

The Director must also keep a record of places of business that includes the business address and the owner's name.¹⁶

Advisory Committee

Section 12-105-106(2), C.R.S., requires the Director to appoint a six-member Advisory Committee to assist in the performance of the Director's duties. The Advisory Committee must include three members who hold a license under the Act, one owner or operator of a Colorado school that prepares students for licensure under the Act and

¹⁴ § 12-105-108(1)(d), C.R.S.

¹⁵ § 12-105-106(1), C.R.S.

¹⁶ § 12-105-105(1), C.R.S.

is licensed by the Division of Private Occupational Schools, a representative from a licensed school that provides training for licensees and a member of the public. The Advisory Committee must meet at least once a year, before rules are adopted, and at any other time the Director requests.

Regulated Occupations

The Director provides regulatory oversight of barbers, cosmetologists, estheticians, hairstylists, and nail technicians. These professions provide the following services, including, but not limited to:

Barbers may shave or trim the beard, may cut and dye hair including applying hair tonic, perform facial or scalp massages, and apply cosmetic preparations to the scalp, face, neck, or shoulders.¹⁷

Cosmetologists have the broadest scope of practice of all the professions regulated under the Act and may perform most tasks within the scopes of practice of the other professions.¹⁸ For example, cosmetologists may arrange, dress, curl, wave, cleanse, cut bleach and color hair, and they may perform manicures or pedicures.¹⁹

Estheticians may give facials; apply makeup; massage, clean and beautify the face, neck, arms, bust or torso; and remove unwanted hair using depilatories, wax, or tweezers.²⁰

Hairstylists may cleanse and massage the scalp; cleanse, cut, style, straighten, color, wave, lighten, and apply extensions to the hair; and trim the beard.²¹

Nail technicians may cleanse, file, trim, buff, and polish nails and massage, cleanse, manipulate the arms, hands, feet, or ankles. Nail technicians may also use wax or depilatories to remove unwanted hair on the leg up to the knee and on the arm up to the elbow.²²

The definition of each profession applies when services are provided for payment (either directly or indirectly) or when done without payment for the public generally. There is considerable overlap among the professions and slight variations in the statutory language.

In order to qualify to take the licensing examination for any license issued under the Act, applicants must satisfy the following:

¹⁷ § 12-105-104(2), C.R.S.

¹⁸ § 12-105-104(7), C.R.S.

¹⁹ § 12-105-104(7), C.R.S.

²⁰ § 12-105-104(8), C.R.S.

²¹ § 12-105-104(9), C.R.S.

²² § 12-105-104(11), C.R.S.

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- Be at least 16 years old;²³
 - Provide proof of graduation from a barber or beauty school approved by the Colorado Department of Higher Education's Division of Private Occupational Schools, the State Board for Community Colleges and Occupational Education, or, if the school is located in another state or country, by the governmental agency responsible for approving such schools in that state or country.²⁴

Following is the minimum number of credit or contact hours which an applicant must complete to qualify to take the examination for each license type:²⁵

- Cosmetologist: 50 credit hours or 1,500 contact hours
- Barber: 50 credit hours or 1,500 contact hours
- Hairstylist: 1,200 contact hours
- Esthetician: 600 contact hours
- Nail technician: 1,200 contact hours

The Barber and Cosmetology rules establish, for each license type, the minimum number of credit hours required in each specific subject area. For each license type, a portion of the hours must include instruction in disinfection, cleaning, and safe work practices; laws, rules, and regulations; and management, ethics, interpersonal skills, and salesmanship. The remaining hours are devoted to skills specific to each profession.

If the applicant received training outside of Colorado, the applicant must provide proof of graduation from a school approved by the governmental agency responsible for approving such schools in that state or country.²⁶ In these cases, the applicant must also provide proof that the educational requirements he or she completed are substantially equivalent to those set by the Director.²⁷

Once applicants have paid the fee and provided proof of training, they may take the licensing examination.²⁸

Each licensing examination must include a written and a practical component and may address any other areas the Director deems necessary.²⁹ Each examination must be consistent with the practical and theoretical requirements of its respective profession and emphasize health and safety issues. The Director, in consultation with the Advisory Committee, must review, revise, and update the examinations on a reasonable basis.³⁰

²³ § 12-105-111(1), C.R.S.

²⁴ § 12-105-11(2), C.R.S.

²⁵ § 12-105-111(3), C.R.S.

²⁶ § 12-105-111(2), C.R.S.

²⁷ § 12-105-111(2), C.R.S.

²⁸ § 12-105-111(4), C.R.S.

²⁹ § 12-105-107(2), C.R.S.

³⁰ § 12-105-107(3), C.R.S.

The practical demonstrations must be conducted under conditions that are as similar to actual operating conditions as possible.³¹ Anyone who evaluates applicants taking the practical examination must have practical experience and hold a license under the Act.³²

Once an applicant has passed the examination and paid an application fee, the Director must issue a license to the applicant.³³

Applicants who hold a license in another state may apply for a license by endorsement if they satisfy the requirements of the occupational credential portability program.³⁴

Once the license has been issued, the licensee must display the license conspicuously in their principal place of business.³⁵

If a license has been expired for more than two but less than five years, an applicant must provide verification of an active license from another state, submit proof of completion of 16 hours of continuing education or pass the written examination.³⁶ If an applicant had a license that has been expired for more than five years, the applicant must provide verification of an active license from another state, submit proof of completion of 24 hours of continuing education or pass the written examination.³⁷

Generally, a license is required to provide barber, cosmetology, esthetician, hairstyling, or nail technician services in Colorado, and if anyone practices or offers or attempts to practice any of these professions without an active license, the Director may issue an order to cease and desist such activity.³⁸ However, certain people are exempted from the provisions of the Act, and nothing in the Act prohibits services by:³⁹

- A person who is acting within the scope of practice for which they are licensed;
- Licensed and unlicensed volunteers in the performance of charitable services for washing and setting hair of patients confined to hospitals, nursing, convalescent or boarding homes, as well as persons who are confined to their homes by reason of age, physical or mental infirmity or physical disability;
- Students who have received more than 20 percent of the hours of instruction required by the Act who are providing services in a school setting under the supervision of a licensee within the school setting;
- A person who provides natural hair braiding services; and

³¹ § 12-105-107(2), C.R.S.

³² § 12-105-107(5), C.R.S.

³³ § 12-105-111(4), C.R.S.

³⁴ § 12-105-115, C.R.S.

³⁵ § 12-105-116, C.R.S.

³⁶ 4 C.C.R. § 731-1.5 C 2, Barber and Cosmetology Licensure Rules and Regulations.

³⁷ 4 C.C.R. § 731-1.5 C 3, Barber and Cosmetology Licensure Rules and Regulations.

³⁸ § 12-105-121(1), C.R.S.

³⁹ §§ 12-105-1118(1) and (2), C.R.S.

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- Anyone providing free lectures and demonstrations on beauty culture, hairdressing and the use of beauty preparations performed without compensation.

Business Registration

Section 12-105-105(1), C.R.S., requires the Director to keep a register of places of business including each owner's name and the address of the business. A place of business is a fixed establishment, temporary location or place, including any mobile barber shop or beauty salon, where one or more people engage in the practice of barbering, hairstyling, or cosmetology or practice as a nail technician or an esthetician.⁴⁰ Barber, beauty, and cosmetology schools regulated by the Division of Private Occupational Schools or the community college system as places of business are subject to registration.⁴¹

The Director has the authority to conduct inspections of any business where a statutory violation is alleged to have occurred.⁴²

Cleaning and Disinfection Rules

Pursuant to section 12-105-106(1)(c), C.R.S., the Director promulgated rules related to Cleaning and Disinfection, which establish standards for licensees and businesses.

The Barber and Cosmetology rules draw a distinction between cleaning, defined as physically removing all visible debris from all surfaces by washing with soap and water,⁴³ and disinfection, which is defined as the use of chemicals to destroy pathogens or other types of microorganisms,⁴⁴ and outline the acceptable cleaning and disinfection methods for specific tools, implements, and materials, such as combs, pedicure footbaths, scissors, and towels. The rules also designate certain items—such as applicator sticks, disposable gloves, and emery boards—as single-use and directs the licensee to discard those items after using them once.⁴⁵

The rules also require licensees to practice good hygiene habits, such as regular hand-washing with soap and water and dried with a disposable or unused cloth towel prior to providing services to consumers.⁴⁶

Additionally, registered business are required to ensure the following:⁴⁷

⁴⁰ § 12-105-104(15), C.R.S.

⁴¹ 4 C.C.R. § 731-1.6 A 1, Barber and Cosmetology Licensure Rules and Regulations

⁴² § 12-105-120, C.R.S.

⁴³ 4 C.C.R. § 731-1.7 A 1, Barber and Cosmetology Licensure Rules and Regulations

⁴⁴ 4 C.C.R. § 731-1.7 A 5, Barber and Cosmetology Licensure Rules and Regulations

⁴⁵ 4 C.C.R. § 731-1.7 A 12, Barber and Cosmetology Licensure Rules and Regulations

⁴⁶ 4 C.C.R. § 731-1.7 C 1, Barber and Cosmetology Licensure Rules and Regulations

⁴⁷ 4 C.C.R. § 731-1.7 E 1, Barber and Cosmetology Licensure Rules and Regulations

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- All work areas are kept clean and free from accumulated hair, products, chemicals, dust and other debris;
 - Persons providing services of regulated professions have an active license;
 - Licensees do not attempt to perform any service outside the scope of the licensee's practice;
 - Businesses are not in possession of or storing any item, product, device, or tool deemed outside a licensee's scope of practice; and
 - Licensees do not use any product, device, tool or supply that has been banned, deemed to be poisonous, or is unsafe for use.

Complaints and Enforcement

Anyone may file a complaint against a person licensed under the Act. Grounds for discipline include:⁴⁸

- Having been convicted of or having entered a plea of *nolo contendere* to a felony;
- Making any misstatement on a license application;
- Failing to meet generally accepted stands of practice, which includes performing services outside of the person's area of training, experience, or competence;
- Excessively or habitually using or abusing alcohol or controlled substances;
- Violating any of the provisions of the Act or any order of the Director;
- Being guilty of unprofessional or dishonest conduct;
- Advertising by means of false or deceptive statements;
- Failing to display their license;
- Failing to comply with the Director's rules;
- Being guilty of willful misrepresentation;
- Failing to disclose to the Director within 45 days, a felony conviction or crime that is related to the practice as a barber, cosmetologist, esthetician, hairstylist or nail technician;
- Aiding or abetting the unlicensed practice of barbering, hairstyling, cosmetology, esthetician or nail technician; and
- Failing to respond to a complaint sent by the Director in a timely manner.

The Act authorizes the Director to investigate such complaints and conduct inspections of businesses where violations allegedly occurred.⁴⁹

If the Director finds that a licensee has violated the Act, they may revoke, suspend, or deny the license; place the license on probation; or issue a letter of admonition.⁵⁰

⁴⁸ § 12-105-125(1), C.R.S.

⁴⁹ § 12-105-106(1)(f), C.R.S.

⁵⁰ § 12-105-106(1)(b), C.R.S.

The Director may also impose fines between \$100 and \$500 per violation per day for the first violation⁵¹ and between \$1,000 and \$2,000 per violation per day for each subsequent violation.⁵² All fines collected are credited to the General Fund.

If an investigation reveals conduct on the part of a licensee that does not warrant formal disciplinary action but might lead to serious consequences if not corrected, the Director may issue a confidential letter of concern.⁵³

Services that May Be Provided with Additional Training

There are several services that are beyond the scope of a basic licensee but licensed cosmetologists, estheticians and nail technicians may perform after additional training. The additional services, as well as training requirements, are as follows:

- Cosmetologists and estheticians may provide **chemical resurfacing exfoliating procedures**, which is the process of removing the dead cell layer of skin using resurfacing exfoliating substances and tools. In order to be authorized to provide these services, cosmetologists and estheticians are required to complete 24 hours of additional training.⁵⁴
- Cosmetologists and estheticians may provide **permanent makeup** or facial cosmetic pigment implantation services, which is the process of beautifying the face by inserting or implanting facial cosmetic pigment color under the surface of the skin or mucosa with a needle. In order to be authorized to provide these services, cosmetologists and estheticians are required to complete an additional 132 hours of training.⁵⁵
- Cosmetologists and nail technicians may use **electric files** if they obtain eight additional hours of training that meet the criteria established in rule.⁵⁶
- Nail technicians may provide limited **hair removal** (waxing) services on the leg up to the knee and on the arm up to the elbow (hands and feet are within the scope and appropriate areas for waxing). In order to provide waxing services, nail technicians must complete six additional hours of training.⁵⁷

⁵¹ § 12-105-121(2)(a), C.R.S.

⁵² § 12-105-121(2)(b), C.R.S.

⁵³ § 12-105-106(1)(j), C.R.S.

⁵⁴ 4 C.C.R. § 731-1.9 A 5, Barber and Cosmetology Licensure Rules and Regulations

⁵⁵ 4 C.C.R. § 731-1.9 E 3, Barber and Cosmetology Licensure Rules and Regulations

⁵⁶ 4 C.C.R. § 731-1.9 F 3, Barber and Cosmetology Licensure Rules and Regulations

⁵⁷ 4 C.C.R. § 731-1.9 G 3, Barber and Cosmetology Licensure Rules and Regulations

Program Description and Administration

In a sunset review, the Colorado Office of Policy, Research and Regulatory Reform (COPRRR) is guided by sunset criteria located in section 24-34-104(6)(b), Colorado Revised Statutes (C.R.S.). The fifth, sixth and seventh sunset criteria question:

Whether the agency operates in the public interest and whether its operation is impeded or enhanced by existing statutes, rules, procedures, and practices and any other circumstances, including budgetary, resource, and personnel matters;

Whether an analysis of agency operations indicates that the agency or the agency's board or commission performs its statutory duties efficiently and effectively; and

Whether the composition of the agency's board or commission adequately represents the public interest and whether the agency encourages public participation in its decisions rather than participation only by the people it regulates.

In part, COPRRR utilizes this section of the report to evaluate the agency according to these criteria.

The Barber and Cosmetologist (Act) is created in section 12-105-101, *et seq.*, C.R.S. The purpose of the Act is to provide regulatory oversight of barbers, cosmetologists, estheticians, hairstylists, nail technicians and places of business.

The regulation of barbers, cosmetologists, estheticians, hairstylists, nail technicians and places of business is vested in the Director of the Division of Professions and Occupations (Director and Division, respectively) within the Department of Regulatory Agencies. The Director is responsible for, among other things, rulemaking, policymaking and, when necessary, imposing formal discipline on practitioners.

Also, the Barber and Cosmetology Advisory Committee (Advisory Committee) was created within the Act to assist the Director in the performance of their duties.

The Advisory Committee consists of six members appointed by the Director:⁵⁸

- Three members who are licensed under the Act,
- One owner or operator of a school that provides training for licensees in the industry and is licensed by the Division of Private Occupational Schools,
- One representative from a licensed school that provides training for licensees, and
- One member of the public.

⁵⁸ § 12-105-106(2), C.R.S.

The Advisory Committee is required to meet at least once per year, prior to the adoption of rules and at the request of the Director.⁵⁹ However, it has only met once in 2023, zero times in 2024 and once in 2025.

Table 2 highlights the total expenditures for the regulation of barbers, cosmetologists, estheticians, hairstylists, nail technicians and places of business in fiscal years 19-20 through 23-24.

Table 2
Total Program Expenditures in Fiscal Years 19-20 through 23-24

Fiscal Year	Total Expenditures	FTE
19-20	\$1,158,369	3.65
20-21	\$1,395,601	2.65
21-22	\$1,456,219	2.65
22-23	\$1,308,700	2.88
23-24	\$1,496,292	2.88

Generally, increases in total expenditures for administration of the regulatory oversight of barbers, cosmetologists, estheticians, nail technicians and places of business are attributable to legal services and Office of Information Technology costs.

In fiscal year 24-25, the Division devoted 5.00 full-time equivalent (FTE) employees to provide regulatory oversight of barbers, cosmetologists, estheticians, nail technicians and places of business. The FTE are as follows:

- Inspector I—1.0 FTE is responsible for, among other things, conducting initial and probationary field inspections to determine whether businesses, salons and licensees are in compliance with the Act and applicable rules.
- Technician II—2.0 FTE is responsible for, among other things, overseeing and monitoring daily operations of the work unit, including preparing information for the Director.
- Technician IV—1.0 FTE is responsible for the overall management of the program, including complaint resolution, stakeholder engagement, case summary review and application review and approval.
- Program Management I—1.0 FTE is responsible for, among other things, the overall management and supervision of the program, including policy development and licensing and registration of professionals and businesses.

The aforementioned FTE do not include staffing in the centralized offices of the Division, which include the following:

⁵⁹ § 12-105-106(2), C.R.S.

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- Director's Office,
 - Office of Investigations,
 - Office of Expedited Settlement,
 - Office of Examination Services, and
 - Office of Licensing.

Table 3 delineates the fees associated with the barber, cosmetologists, estheticians, hairstylists, nail technicians and businesses in fiscal years 19-20 through 23-24. licensing program.

Table 3
Licensing and Business Registration Fees

Profession	Fiscal Year	Original	Endorsement	Renewal*
Barber	19-20	\$35	\$50	\$26
	20-21	\$35	\$50	\$26
	21-22	\$35	\$50	\$26
	22-23	\$35	\$50	\$26
	23-24	\$35	\$70	\$26
Cosmetologist	19-20	\$50	\$50	\$50
	20-21	\$50	\$50	\$50
	21-22	\$50	\$50	\$50
	22-23	\$50	\$50	\$50
	23-24	\$70	\$70	\$58
Esthetician	19-20	\$50	\$50	\$50
	20-21	\$50	\$50	\$50
	21-22	\$50	\$50	\$50
	22-23	\$50	\$50	\$50
	23-24	\$70	\$70	\$58
Hairstylist	19-20	\$50	\$50	\$26
	20-21	\$50	\$50	\$26
	21-22	\$50	\$50	\$26
	22-23	\$50	\$50	\$26
	23-24	\$70	\$70	\$26
Nail Technician	19-20	\$50	\$50	\$26
	20-21	\$50	\$50	\$26
	21-22	\$50	\$50	\$26
	22-23	\$50	\$50	\$26
	23-24	\$70	\$70	\$26
Business Registration	19-20	\$35	Not applicable	\$26
	20-21	\$35	Not applicable	\$26
	21-22	\$35	Not applicable	\$26
	22-23	\$35	Not applicable	\$26
	23-24	\$35	Not applicable	\$26

*Barbers, estheticians, hairstylists, and nail technicians renew their license every two years. One half of licensed cosmetologists renew their license every year, so renewal fees are set annually. Business registrations renew on odd-numbered years, so renewal fees are only set every other year.

The increase in original and renewal licensing fees in fiscal year 23-24 from the previous fiscal year is attributable to higher overall program costs. Notably, the original license fee for barbers was the only profession that did not receive an increase in original licensing fee in fiscal year 23-24.

Licensing

The eleventh and twelfth sunset criteria question whether the scope of practice of the regulated occupation contributes to the optimum use of personnel and whether entry requirements encourage equity, diversity and inclusivity.

In part, COPRRR utilizes this section of the report to evaluate the program according to these criteria.

There are two primary avenues for candidates to obtain a barber, cosmetologist, esthetician, hairstylist, or manicurist license in Colorado: examination and endorsement.

Examination applicants must apply directly to the examination vendor—currently PSI—to sit for the written (theory) and the practical examinations. Once an applicant has passed both examinations, a license is issued.

Endorsement applicants must complete an application and submit it with all supporting documentation to the Division, which includes submitting verification that the applicant possesses an active/valid license and is in good standing at the time of application. Applicants for licensure by endorsement must also attest to the following:⁶⁰

- Graduation from a school approved by the appropriate governmental agency responsible for approving such schools in a state or United States territory;
- Successful completion of training hours that are substantially equivalent to the training hours required by Colorado;
- Passage of a written examination administered or accepted by the appropriate licensing agency for a state or United States territory;
- Passage of a practical examination administered or accepted by the appropriate licensing agency in a state or United States territory or at least 1,000 hours of work experience for the type of license being sought within two years preceding the licensing application; or
 - Submit verification of having held a valid license for at least one year in another jurisdiction and the scope of practice is substantially similar to the scope of practice in the Act.

The applicant is also required to disclose any disciplinary actions taken against them.

⁶⁰ 4 C.C.R. § 731-1.4 C 3, Barber and Cosmetology Licensure Rules and Regulations

For those applicants who completed their training or experience in military service, such training or experience must be substantially equivalent, as determined by the Director, to the requirements established for licensure.

Table 4 highlights the number of new, endorsement and renewal licenses issued for each license type in fiscal years 19-20 through 23-24.

Table 4
Licenses in Fiscal Years 19-20 through 23-24

Profession	Fiscal Year	Examination	Endorsement	Renewal	TOTAL
Barber	19-20	158	77	2,807	3,382
	20-21	116	81	35	3,203
	21-22	157	66	2,884	3,027
	22-23	160	96	Not applicable	3,382
	23-24	208	116	3,161	3,303
Cosmetologist	19-20	601	654	14,978	34,659
	20-21	739	621	14,341	34,322
	21-22	781	605	16,414	34,302
	22-23	766	583	14,827	34,433
	23-24	864	659	16,636	35,016
Esthetician	19-20	673	251	9,097	10,878
	20-21	1,003	269	91	11,113
	21-22	1,175	409	10,649	11,483
	22-23	1,506	324	Not applicable	13,596
	23-24	1,500	302	12,947	13,810
Hairstylist	19-20	83	45	2,721	3,088
	20-21	88	40	40	2,950
	21-22	76	38	2,748	2,815
	22-23	101	19	N/A	3,033
	23-24	114	36	2,910	2,911
Nail Technician	19-20	286	253	9,194	10,451
	20-21	345	199	59	10,158
	21-22	317	496	9,531	10,093
	22-23	382	239	Not applicable	10,914
	23-24	340	376	10,204	10,522

In fiscal years 19-20 through 23-24, the total number of licenses for each license type remained fairly constant. As the data indicate, estheticians experienced the largest growth in licensees from fiscal year 19-20 to 23-24. The increase is generally attributable to the overall growth in the skincare industry.

Table 5 shows the total number of active licensees, which includes all license types, in fiscal years 19-20 through 23-24.

Table 5
Total Number of Licensees in fiscal years 19-20 through 23-24

Fiscal Year	New/Exam	Endorsement	Renewal	TOTAL
19-20	3,743	1,280	43,594	67,762
20-21	4,150	1,210	14,566	67,763
21-22	4,652	1,614	46,660	66,929
22-23	4,676	1,261	14,827	71,301
23-24	5,082	1,489	50,841	71,060

Table 5 illustrates that the total number of licensees increased from fiscal year 19-21 to 23-24. Generally, the increase is attributable to the increased demand for beauty services.

Table 6 illustrates, for the five fiscal years indicated, the number of new business registrations issued.

Table 6
Business Registrations Issued

Fiscal Year	Number
19-20	664
20-21	632
21-22	542
22-23	565
23-24	580

As Table 6 indicates, the number of new business registrations has fluctuated slightly over the five-year reporting period. The process for registering a business includes applicants completing the required application, paying a fee and including each owner's name and address of the business. Because the registration is specific to a physical location within Colorado, there is no endorsement pathway. The owner of a place of business does not need to hold an individual license issued under the Act.

Examination

The eleventh and twelfth sunset criteria question whether the scope of practice of the regulated occupation contributes to the optimum use of personnel and whether entry requirements encourage equity, diversity and inclusivity.

In part, COPRRR utilizes this section of the report to evaluate the program according to these criteria.

In order to qualify for any license type issued under the Act, all applicants must pass both a written (theory) and a practical examination in their given profession. The Director contracts with an outside examination vendor, PSI, to develop and administer the examinations. PSI has testing locations throughout Colorado, including: Denver, Fort Collins, Colorado Springs, Grand Junction, Durango and Pueblo.⁶¹

Applicants for a barber, cosmetology, esthetician hairstylist or nail technician license must submit an application to PSI, documentation verifying that they completed an education program, and a \$32 application fee.

Barber candidates have one year from the date PSI approves their application to pass both examinations. Candidates must pass the practical examination before they can take the written examination. The current fee for the practical examination is \$69 and the written examination is \$62.⁶²

The barber practical examination consists of nine topic areas:⁶³

- Workstation preparation,
- Basic facial,
- Haircutting,
- Straight razor shaving,
- Chemical wave,
- Foil highlights,
- Hydroxide virgin relaxer,
- Hair color retouch, and
- End-of-the-day clean-up.

The barber practical examination must be completed within 2.5 hours, and a candidate must score at least 70 percent to pass.⁶⁴

⁶¹ PSI National Barber and Cosmetology Programs. *Colorado Barber Test Taker Guide*. Retrieved July 18, 2025, from <https://test-takers.psiexams.com/api/content/bulletin/3658>

⁶² PSI National Barber and Cosmetology Programs. *Colorado Barber Test Taker Guide*. Retrieved July 18, 2025, from <https://test-takers.psiexams.com/api/content/bulletin/3658>

⁶³ PSI National Barber and Cosmetology Programs. *Colorado Barber Test Taker Guide*. Retrieved July 18, 2025, from <https://test-takers.psiexams.com/api/content/bulletin/3658>

⁶⁴ PSI National Barber and Cosmetology Programs. *Colorado Barber Test Taker Guide*. Retrieved July 18, 2025, from <https://test-takers.psiexams.com/api/content/bulletin/3658>

Candidates for the barber license must also pass the written examination, which consists of the following areas:

- Safety and infection control;
- Client consultation;
- Hair, scalp and skin analysis;
- Hairstyling;
- Haircutting,
- Chemical services;
- Shaving; and
- Skin care.

The written examination for barbers contains 95 scored questions and it must be completed in two hours.⁶⁵

The current fee for the cosmetologist practical examination is \$69 and the written examination is \$62.⁶⁶

The cosmetology practical examination consists of the following topic areas:

- Workstation preparation,
- Nail enhancement with form,
- Eyebrow wax and tweeze,
- Haircutting,
- Chemical wave,
- Foil highlight,
- Hydroxide virgin relaxer,
- Hair color retouch, and
- End of day clean up.

Candidates must complete the practical examination in 3.75 hours and must score at least 70 percent to pass.⁶⁷

The written examination for cosmetologists includes:

- Safety and infection control;
- Client consultation;
- Hair, scalp, skin and nail analysis;
- Hairstyling;
- Haircutting;
- Chemical services;

⁶⁵ PSI National Barber and Cosmetology Programs. *Colorado Barber Test Taker Guide*. Retrieved July 18, 2025, from <https://test-takers.psiexams.com/api/content/bulletin/3658>

⁶⁶ PSI National Barber and Cosmetology Programs. *Colorado Cosmetology Test Taker Guide*. Retrieved July 18, 2025, from <https://test-takers.psiexams.com/api/content/bulletin/3659>

⁶⁷ PSI National Barber and Cosmetology Programs. *Colorado Cosmetology Test Taker Guide*. Retrieved July 18, 2025, from <https://test-takers.psiexams.com/api/content/bulletin/3659>

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- Skin care;
 - Makeup removal;
 - Hair removal; and
 - Nails.

The written examination for cosmetologists contains 110 scored questions and must be completed in two hours.⁶⁸

The current fee for the esthetician practical examination is \$69 and the written examination is \$62.⁶⁹

The esthetician practical examination consists of the following topic areas:

- Workstation preparation,
- Basic facial,
- Eyebrow waxing and tweezing,
- Makeup application, and
- End-of-day clean-up.

Candidates must complete the practical examination in 95 minutes and score at least 70 percent to pass.⁷⁰

The written examination for estheticians includes the following:

- Safety and infection control,
- Client consultation,
- Skin care,
- Makeup,
- Hair removal, and
- Advanced treatments.

The written examination for estheticians includes 75 scored questions and must be completed in 90 minutes.⁷¹

The current fee for the hair stylist practical examination is \$69 and the written examination is \$62.⁷²

The hairstylist practical examination consists of the following topic areas:

⁶⁸ PSI National Barber and Cosmetology Programs. *Colorado Cosmetology Test Taker Guide*. Retrieved July 18, 2025, from <https://test-takers.psiexams.com/api/content/bulletin/3659>

⁶⁹ PSI National Barber and Cosmetology Programs. *Colorado Esthetician Test Taker Guide*. Retrieved July 18, 2025, from <https://test-takers.psiexams.com/api/content/bulletin/3660>

⁷⁰ PSI National Barber and Cosmetology Programs. *Colorado Esthetician Test Taker Guide*. Retrieved July 18, 2025, from <https://test-takers.psiexams.com/api/content/bulletin/3660>

⁷¹ PSI National Barber and Cosmetology Programs. *Colorado Esthetician Test Taker Guide*. Retrieved July 18, 2025, from <https://test-takers.psiexams.com/api/content/bulletin/3660>

⁷² PSI National Barber and Cosmetology Programs. *Colorado Hairstylist Test Taker Guide*. Retrieved July 18, 2025, from <https://test-takers.psiexams.com/api/content/bulletin/3661>

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- Workstation preparation,
 - Haircutting,
 - Chemical wave,
 - Foil highlights,
 - Hydroxide virgin relaxer,
 - Haircolor retouch, and
 - End-of-the-day clean-up.

The hairstylist practical examination must be completed in 3 hours and 40 minutes and candidates are required to score at least 70 percent to pass.⁷³

The written examination for hairstylists includes the following:

- Safety and infection control,
- Client consultation,
- Hair and scalp,
- Hairstyling,
- Haircutting, and
- Chemical services.

The written examination for hairstylists includes 75 score questions and must be completed in 90 minutes.⁷⁴

The current fee for the nail technician practical examination is \$69 and the written examination is \$62.⁷⁵

The nail technician practical examination consists of the following topic areas:

- Workstation preparation,
- Basic manicure,
- Nail tip application,
- Nail enhancement using a form, and
- End-of-day clean-up.

Candidates must complete the practical examination in 1 hour and 45 minutes and score at least 70 percent to pass.⁷⁶

The written examination for the nail technician examination includes the following:

⁷³ PSI National Barber and Cosmetology Programs. *Colorado Hairstylist Test Taker Guide*. Retrieved July 18, 2025, from <https://test-takers.psiexams.com/api/content/bulletin/3661>

⁷⁴ PSI National Barber and Cosmetology Programs. *Colorado Hairstylist Test Taker Guide*. Retrieved July 18, 2025, from <https://test-takers.psiexams.com/api/content/bulletin/3661>

⁷⁵ PSI National Barber and Cosmetology Programs. *Colorado Nail Technician Test Taker Guide*. Retrieved July 18, 2025, from <https://test-takers.psiexams.com/api/content/bulletin/3662>

⁷⁶ PSI National Barber and Cosmetology Programs. *Colorado Nail Technician Test Taker Guide*. Retrieved July 18, 2025, from <https://test-takers.psiexams.com/api/content/bulletin/3662>

- Safety and infection control,
- Client consultation,
- Nail analysis, and
- Nails.

The written nail technician examination includes 70 scored questions and must be completed in 90 minutes.⁷⁷

Importantly, since fiscal year 23-24, all of the aforementioned examinations have been administered in a variety of languages including:

- English,
- Korean,
- Portuguese,
- Chinese,
- Spanish, and
- Vietnamese.

Table 7 highlights the total number of written and practical examinations given in fiscal years 19-20 through 23-24.

Table 7
Total Number of Written and Practical Examinations in Fiscal Years 19-20 through 23-24

Fiscal Year	Number of Written Examinations Given	Number of Practical Examinations Given
19-20	3,056	2,572
20-21	4,489	3,052
21-22	5,011	3,383
22-23	5,729	3,660
23-24	6,207	3,813

Table 7 illustrates that the number of written and practical examinations increased in each of the last five fiscal years. Generally, the increase is attributable to increased demand for beauty services.

Additionally, Table 8 highlights the number of written and practical examinations administered and the corresponding pass rates in fiscal years 19-20 through 23-24.

⁷⁷ PSI National Barber and Cosmetology Programs. *Colorado Nail Technician Test Taker Guide*. Retrieved July 18, 2025, from <https://test-takers.psiexams.com/api/content/bulletin/3662>

Table 8
Pass Rates for the Written and Practical Examinations by License Type

Profession	Fiscal Year	Pass Rate (%) For Written Examination	Pass Rate (%) For Practical Examination
Barber	19-20	59.34	73.31
	20-21	40.64	90.23
	21-22	34.8	97.61
	22-23	34.45	93.65
	23-24	33.97	88.93
Cosmetologist	19-20	54.01	81.24
	20-21	43.59	86.60
	21-22	42.47	89.74
	22-23	39.17	91.14
	23-24	42.38	88.05
Esthetician	19-20	67.50	94.37
	20-21	65.15	95.58
	21-22	58.72	97.60
	22-23	60.85	97.73
	23-24	59.04	95.04
Hairstylist	19-20	56.25	81.51
	20-21	55.35	90.20
	21-22	51.32	84.38
	22-23	48.57	93.18
	23-24	42.45	90.67
Nail Technician	19-20	60.0	78.84
	20-21	46.13	79.78
	21-22	58.96	79.15
	22-23	69.70	81.93
	23-24	63.85	82.42

Generally, the pass rates for the written examination remained relatively stable over the five-year reporting period. Notably though, the pass rates for the barber written examination decreased in each of the last five fiscal years.

The pass rate for the practical examinations for all license types remained relatively constant in the past five fiscal years.

Once candidates pass both examinations, they are eligible to receive a license to practice, as long as they answered “no” to all the background screening questions and have not previously worked as a barber, cosmetologist, esthetician, hairstylist, or nail technician in Colorado.

Complaints

The tenth sunset criterion requires COPRRR to examine whether complaint, investigation and disciplinary procedures adequately protect the public and whether final dispositions of complaints are in the public interest or self-serving to the profession or regulated entity.

In part, COPRRR utilizes this section of the report to evaluate the program according to this criterion.

Anyone can file a complaint against licensees, including other practitioners, business owners and consumers.

Table 9 delineates the total number of complaints, for all license types, filed with the Director in fiscal years 19-20 through 23-24.

Table 9
Complaints Filed with the Director in Fiscal Years 19-20 through 23-24

Nature of Complaint	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Aiding and Abetting Unlicensed Practice	38	45	55	71	65
Continuing Education Violation	0	2	1	0	2
Criminal Conviction	135	66	55	48	19
Drug or Alcohol Abuse	3	11	39	11	25
Enforcement Conversion	1	0	0	0	0
Failure to Report	0	1	5	1	1
False Advertising	0	4	0	1	1
Improper Supervision	0	1	0	0	0
Outside the Scope of Practice	24	13	2	12	3
Physical or Mental Disability	1	0	0	1	0
Substandard Practice	235	170	243	253	399
Unlicensed Practice	664	552	951	892	770
Unprofessional Conduct	21	28	65	28	29
Violation of Stipulation or Director Order	164	36	20	24	10
Total	1,286	929	1,436	1,342	1,324

In fiscal year 20-21, there was a notable decrease in the number of total complaints filed. The decrease is attributable to the COVID-19 pandemic. With the exception of fiscal year 20-21, the number of complaints filed remained fairly constant.

As Table 9 indicates, the most common type of complaint was practicing without a license. The number of complaints against all license types for unlicensed practice fluctuated slightly in the past five fiscal years. The second most common nature of complaint was for substandard practice. Substandard practice complaints vary, but some examples include damaging a client's hair during a hair coloring session or sanitation issues at the business.

Additionally, complaints related to violations of a stipulation or Director's order include issues such as licensees failing to pay a fine or renewing a license. It is unclear the reason for the substantial decrease in these types of complaints.

For a specific breakdown of the nature of all complaints filed in the past five fiscal years for each license type please see Appendix A.

If the Director finds that based upon an inspection or investigation that a licensee has violated the Act, the Director may, among other things, suspend or revoke the license, place the licensee on probation, issue a letter of admonition, or levy an administrative fine.

Disciplinary Activity

The tenth sunset criterion requires COPRRR to examine whether complaint, investigation and disciplinary procedures adequately protect the public and whether final dispositions of complaints are in the public interest or self-serving to the profession or regulated entity.

In part, COPRRR utilizes this section of the report to evaluate the program according to this criterion.

Table 10 illustrates the total number and types of final actions the Director has taken in fiscal years 19-20 through 23-24.

Table 10
Final Actions in Fiscal Years 19-20 through 23-24

Type of Action	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Revocation	10	9	5	3	0
Suspension	0	0	0	0	0
Revocation/Suspensions held in abeyance or stayed or stayed suspended	0	0	0	0	0
Stipulations	361	338	491	319	221
Letters of Admonition	4	70	86	120	39
Other (C&D, Citations)	28	64	104	69	30
Total Disciplinary Actions	403	481	686	511	290
Dismissals	140	88	116	106	41
Dismiss with Letter of Concern	2	66	279	130	157
Total Dismissals	142	154	395	236	198
Total Final Actions	545	635	1,081	747	488

As highlighted in Table 10, the most common type of final agency action utilized was stipulations. Stipulations could include requiring a licensee to complete continuing education or paying a fine. The Director also issued many letters of admonition (LOAs) in the past five fiscal years. LOAs may be issued if a licensee is, for example, practicing on an expired license for one to two years.

The number and type of disciplinary actions by license type in the last five fiscal years, may be found in Appendix B.

Collateral Consequences - Criminal Convictions

The thirteenth sunset criterion requires COPRRR to examine whether the agency, through its licensing, certification or registration process, imposes any sanctions or disqualifications on applicants based on past criminal history and, if so, whether the sanctions or disqualifications serve public safety or commercial or consumer protection interests.

COPRRR utilizes this section of the report to evaluate the program according to this criterion.

The Director has the authority to deny, revoke or suspend a license. The Director may also require an applicant or a licensee to enter into a stipulated agreement in which the licensee is subject to requirements such as probation, continuing education,

substance abuse treatment and monitoring, or other requirements to ensure the licensee is competent to practice.

Table 11 illustrates, over a five-year period, the number and type of license disqualifications or conditional licenses entered into with licensees that were based on criminal conduct.

Table 11
Collateral Consequences—License Disqualifications Based on Criminal Conduct
For All License Types

Nature of Sanction or Disqualification	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Denials	10	1	5	1	0
Revocations	0	0	1	0	0
Suspensions	0	0	0	0	0
Other	55	8	19	17	14
Total	65	9	25	18	14

As Table 11 delineates, the “Other” category includes the highest number sanctions or disqualifications for licensees in the past five fiscal years. Typically, this category includes situations when an LOA and stipulation is issued to a licensee. The LOA and stipulation are concurrent with court orders, where a licensee has criminal convictions such as driving under the influence.

Inspections

Some types of complaints, particularly those against businesses, will prompt an unannounced inspection. During an inspection, the inspector surveys the establishment to assure that stations are clean, implements are properly stored, and required documents—such as Material Safety Data Sheets (which disclose the ingredients of a given product, any potential hazards it poses, and instructions for its proper use, storage, and disposal) and cleaning and disinfecting logs for pedicure spa tubs—are available. The inspector also typically asks to see the licenses of all the people providing services at the establishment.

Table 12 illustrates, by license type, the number of inspections conducted in fiscal years 19-20 through 23-24.

Table 12
Inspections

Fiscal Year	Number of Inspections
19-20	28
20-21	107
21-22	105
22-23	157
23-24	188

The low number of inspections in fiscal year 19-20 was attributable to the COVID-19 pandemic when many businesses were closed. Most of the violations identified during inspections expose cleaning and disinfection violations.

If an inspector discovers any violations of the Act, they may issue a citation to the business and any licensee on the spot. The inspector has some discretion in determining the fine amount for each violation, depending on the severity of the violation, the nature of the underlying complaint, and the business's complaint history. The inspector may offer a reduced fine to business owners and licensees who pay within a specified period.

Table 13 highlights the total fines collected in the past five fiscal years.

Table 13
Total Fines Imposed and Collected Fines

Fiscal Year	Number of Fines Imposed	Total Value of Fines Imposed	Total Value of Fines Collected
19-20	45	\$31,596	\$38,995
20-21	6	\$2,525	\$1,969
21-22	1	\$200	\$220
22-23	2	\$1,625	\$1,294
23-24	17	\$15,400	\$12,860

Fines are often imposed when violations of the Act or applicable rules occur during inspections of businesses. As Table 13 shows, the number of fines imposed decreased substantially in fiscal year 20-21 from the previous fiscal year and remained low until increasing in fiscal year 23-24. The substantial decrease is attributable to the COVID-19 pandemic, when inspections of businesses decreased significantly. As a result, the total number of fines imposed, the value of fines imposed and the value of fines collected decreased during those years.

Additionally, in Table 13, the total fines collected were higher than the value of fines imposed in each of the fiscal years. This is due to fines being imposed in one fiscal year but ultimately being collected in the next fiscal year.

Analysis and Recommendations

The final sunset criterion questions whether administrative and statutory changes are necessary to improve agency operations to enhance the public interest. The recommendations that follow are offered in consideration of this criterion, in general, and any criteria specifically referenced in those recommendations.

Recommendation 1 – Continue the Barber and Cosmetologist Act for 11 years, until 2037.

Article 105 of Title 12, Colorado Revised Statutes (C.R.S.), vests the Director of the Division of Professions and Occupations (Director) within the Department of Regulatory Agencies (DORA) with the power to regulate barbers, cosmetologists, estheticians, hairstylists, nail technicians and owners of their places of business. The statute authorizes the Director to promulgate rules, investigate complaints, and discipline licensees and registered businesses that violate the Barber and Cosmetologist Act (Act) and applicable rules. The Director appoints the six-member Barber and Cosmetology Advisory Committee (Advisory Committee) to assist in the performance of the Director's duties.

The purpose of the Act is not to discern whether a haircut or a manicure is attractive. Consumers are best equipped to determine whether a service meets their expectations, and if it does not, to seek services from another licensee or in a different business. It is in the economic interest of licensees and registrants to provide the highest quality, most up-to-date services and products available. Rather, the Act was created to protect the public health, safety, and welfare.

The practice of all the professions regulated under the Act involve, to varying degrees, the use of sharp implements, such as shears, razors, and nippers, and harsh chemicals, such as those in dyes, relaxers, and exfoliants. An incompetent barber could cut a client when improperly using a straight razor; an incompetent cosmetologist could burn a client's scalp by leaving a chemical treatment in place for too long. The number of complaints filed with the Director in fiscal years 19-20 through 23-24 indicate such incidents do, in fact, occur.

While professional grade implements and chemicals are readily available to the public, there is an important difference between purchasing these items for personal use and using them on members of the public. Consumers who purchase these products for their own use assume the responsibility of using them correctly. Regulated professionals use the products on consumers and assume that responsibility.

Another risk that the professions regulated under the Act pose to the public is in the transmission of communicable diseases and bacterial infections. The practice of all of the professions regulated under the Act involve extensive person-to-person contact. Common infections such as norovirus and influenza are easily transmitted by unwashed

hands. Infections such as methicillin-resistant *staphylococcus aureus* (commonly called MRSA) can be transmitted via improperly disinfected implements or surfaces. In fact, the only other DORA-regulated professions with a similar degree of contact are in health care, where the necessity for following proper cleaning and disinfection protocols is unquestioned.

Some argue that if barbering, cosmetology, and related industries were unregulated, market competition would compel the individuals and businesses providing such services to maintain cleaning and disinfection standards. Individuals and shops with poor standards would lose clients and be driven from the marketplace, while shops with high standards would grow and prosper.

This argument assumes that consumers possess the expertise to evaluate cleaning and disinfection practices. However, while some violations—such as electric clippers clogged with hair and visibly dirty pedicure footbaths—are readily apparent, others are not. There is no way to determine by looking at a footbath or a pair of shears whether they have been properly disinfected. Visibly clean implements or footbaths may still harbor harmful bacteria or pathogens.

When members of the public lack the expertise or resources to recognize a threat, it is appropriate for a regulatory body to act on the public's behalf. By requiring prospective licensees to undergo training addressing specific areas and pass written and practical examinations, the Director ensures that entry-level licensees have the skills to practice safely. By fielding complaints against licensees and registrants and inspecting barbershops and salons, they are assuring that basic cleaning and disinfection standards are met. These actions benefit the public. As such, regulation of the industry is justified.

This is a director model program, meaning that the regulatory authority resides with the Director rather than an independent board. The Director regulates more than 71,000 individuals and businesses under the Act. Despite this large number, the majority of complaints filed do not allege public harm; rather, they relate to unlicensed practice. Such complaints do not require the professional expertise of a licensing board to resolve. However, regulatory oversight is necessary to ensure unlicensed—and thus untrained—professionals are not practicing in Colorado.

As such, the director model remains an efficient and effective regulatory structure for these professions.

It is worth noting that concurrently with this sunset review, the Division of Professions and Occupations also underwent a sunset review. Recommendations in the sunset report of the Division will likely impact the Barber and Cosmetologist program, as those recommendations will have Division-wide impact. Such recommendations were made in the sunset report of the Division, as opposed to individual programmatic reports, to ensure consistency and cohesion in policy implementation across the Division.

The first sunset criterion asks whether regulation is necessary to protect the public. By requiring licensees to meet minimal requirements before providing services to the public, investigating complaints, inspecting businesses, setting standards for cleaning and disinfection, and educating licensees and registrants about such standards, the Act, as administered by the Director, protects the health and safety of the public.

Therefore, the General Assembly should continue the Act for 11 years, until 2037.

Recommendation 2 – Sunset the Advisory Committee.

The Advisory Committee was created to assist the Director in addressing regulatory issues such as policy issues and changes, and additions or amendments to the Barber and Cosmetology rules. The Advisory Committee must include three members who hold a license under the Act, one owner or operator of a Colorado school that prepares students for licensure under the Act and is licensed by the Division of Private Occupational Schools, a representative from a licensed school that provides training for licensees and a member of the public. The Advisory Committee must meet at least once a year, before rules are adopted, and at any other time the Director requests.

The Advisory Committee met once in 2022 (November 17, 2022), once in 2023 (April 23, 2023), zero times in 2024 and once in 2025. Since the Advisory Committee meets sparingly and the Director has not requested any additional convenings of the Advisory Committee in the past several years, the Advisory Committee is no longer necessary and should be repealed.

Importantly, the elimination of the Advisory Committee will not compromise the Director’s ability to utilize expert advice. The Director can still convene *ad hoc* committees representing industry experts, for example, to address any regulatory issues that arise.

Also, repealing the Advisory Committee from the Act will not limit members of the profession or other stakeholders from engaging in the policy or rulemaking process. In fact, the State Administrative Procedure Act requires stakeholder input during the rulemaking process.

The first sunset criterion asks whether regulation is necessary to protect the public from harm. Since the Advisory Committee does not meet regularly to address regulatory issues, it is not serving as a mechanism to protect the public. Therefore, the General Assembly should sunset the Advisory Committee.

Recommendation 3 – Update the definitions for certain license types in the Act.

Currently, the definition of barbering in section 12-105-104(2), C.R.S., includes references to “hair dying,” which is outdated language. Instead, the reference to hair dying should be replaced with “hair lightening and coloring.” The definition of barbering also contains language concerning “giving a facial and scalp massage.” This language should be replaced with “scalp treatments.”

Additionally, the definition of cosmetology in the Act includes references to “bleaching,” and should be replaced with “lightening.” The definition of cosmetology should include language to authorize cosmetologists to “trim the beard” because trimming a beard is within the scope of practice for cosmetologists.

The definition of hairstyling, in section 12-105-104(9)(c), C.R.S., should remove the reference to “applying hair extensions” because this service is encompassed in natural hair braiding, which is exempt from the Act.

The definition of estheticians in section 12-105-104(8), C.R.S., should be updated to include language that authorizes estheticians to provide hair removal services anywhere on the body as well as the ability to provide body wraps for consumers.

The fourteenth sunset criterion asks whether administrative and statutory changes are necessary to improve agency operations to enhance the public interest. Updating the definitions highlighted above will serve to provide clarity to certain professions related to their specific duties when performing services for consumers.

As such, the General Assembly should update various definitions in the Act, which will provide up-to-date language that is utilized in the industry as well as provide clarity as to permissible services that certain professions may provide to consumers.

Recommendation 4 – Clarify the language regarding exemptions from the Act.

Section 12-105-118, C.R.S., establishes who is exempted from the Act. Currently, the Act highlights several exemptions, such as licensed or unlicensed volunteers who perform charitable services of washing and setting hair to patients who are confined in hospitals, nursing, convalescent or boarding homes.

There are several services provided that should be clarified that are exempt from the Act, including:

- Funeral service providers who provide services on deceased persons;
- Tattoo artists who perform tattooing on the face to look like make-up (such as eyebrows);
- Electrologists;

-
- Persons who are employed to provide hair and make-up services for people who work in theatrical, television or the motion picture industry;
 - Persons who prepare hair color for a client to use at home;
 - Persons providing free haircuts, washing and setting hair within a non-profit organization;
 - Persons who provide barbering and cosmetology services within correctional facilities;
 - Persons who provide make-up application;
 - Persons who cleanse, dress and style hair;
 - Persons who polish nails; and
 - Persons who using manual, mechanical or electrical implements or appliances.

Adding the aforementioned exemptions to the Act will provide more clarity as to what is defined as the practice of the various licensed professions.

The third sunset criterion asks whether the existing statutes and regulations establish the least restrictive form of regulation consistent with the public interest. Updating the exemptions in the Act will provide clarity to certain professions related to their specific duties when performing services for consumers.

As such, the General Assembly should make these changes to clarify who is exempt from the Act.

Recommendation 5 – Make a technical amendment to the Act.

The Act contains outdated language that should be revised to reflect current terminology and administrative practices. Therefore, the General Assembly should amend the Act to address the following technical issue:

- Amend the Act to make it gender neutral by replacing terms such as “him”, “her”, “he”, and “she” with gender-neutral terms.

Appendix A – Complaints by License Type

Table A1
Complaint Information for Barbers

Nature of Complaints	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Aiding and Abetting Unlicensed Practice	3	3	4	4	11
Criminal Conviction	23	10	12	3	2
Drug or Alcohol Abuse	1	1	2	2	4
Failure to Report	0	0	0	1	0
Outside the Scope of Practice	1	0	0	0	0
Substandard Practice	6	8	8	7	11
Unlicensed Practice	47	52	36	37	40
Unprofessional Conduct	3	2	1	3	1
Violation of Stipulation or Board Order	11	5	2	5	1
Total	95	81	65	62	70

Table A2
Complaint Information for Cosmetologists

Nature of Complaints	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Aiding and Abetting Unlicensed Practice	5	8	11	17	5
Continuing Education Violation	0	2	0	0	0
Criminal Conviction	67	30	26	14	9
Drug or Alcohol Abuse	1	4	21	2	7
Enforcement Conversion	1	0	0	0	0
Failure to Report	0	1	3	0	1
Outside the Scope of Practice	3	5	0	1	0
Physical or Mental Disability	1	0	0	0	0
Substandard Practice	30	36	43	37	59
Unlicensed Practice	236	171	264	244	192
Unprofessional Conduct	8	8	22	7	8
Violation of Stipulation or Board Order	56	15	3	7	3
Total	408	280	393	329	284

Table A3
Complaint Information for Estheticians

Nature of Complaints	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Aiding and Abetting Unlicensed Practice	1	2	3	0	3
Continuing Education Violation	0	0	0	0	1
Criminal Conviction	24	8	12	9	1
Drug or Alcohol Abuse	0	3	14	2	7
False Advertising	0	1	0	1	1
Failure to Report	0	0	2	0	0
Outside the Scope of Practice	10	2	0	5	2
Substandard Practice	13	14	20	21	46
Unlicensed Practice	28	45	37	52	44
Unprofessional Conduct	2	4	8	5	7
Violation of Stipulation or Board Order	10	1	0	0	1
Total	88	80	96	95	113

Table A4
Complaint Information for Hair Stylists

Nature of Complaints	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Aiding and Abetting Unlicensed Practice	0	3	3	1	3
Continuing Education Violation	0	0	1	0	0
Criminal Conviction	11	10	5	1	2
Drug or Alcohol Abuse	0	2	0	0	0
Outside the Scope of Practice	1	1	0	2	1
Substandard Practice	7	3	3	4	3
Unlicensed Practice	13	34	17	36	15
Unprofessional Conduct	0	0	1	2	0
Violation of Stipulation or Board Order	6	2	2	1	0
Total	38	55	32	47	24

Table A5
Complaint Information for Nail Technicians

Nature of Complaints	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Aiding and Abetting Unlicensed Practice	8	6	9	6	0
Continuing Education Violation	0	0	0	0	1
Criminal Conviction	7	5	0	1	3
Drug or Alcohol Abuse	0	1	1	0	0
Outside the Scope of Practice	2	1	2	1	0
Substandard Practice	37	18	35	53	54
Unlicensed Practice	65	43	37	45	32
Unprofessional Conduct	4	3	3	2	4
Violation of Stipulation or Board Order	11	2	2	3	1
Total	134	79	89	111	95

Table A6
Complaint Information for Shop Registration

Nature of Complaints	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Aiding and Abetting Unlicensed Practice	20	18	23	40	39
Criminal Conviction	3	0	0	0	0
Aiding and Abetting Unlicensed Practice	20	18	23	40	39
False Advertising	0	1	0	0	0
Improper Supervision	0	1	0	0	0
Outside the Scope of Practice	6	3	0	2	0
Physical or Mental Disability	0	0	0	1	0
Substandard Practice	134	82	100	110	132
Unlicensed Practice	261	148	390	212	257
Unprofessional Conduct	4	11	20	8	6
Violation of Stipulation or Board Order	69	11	10	8	4
Total	517	293	566	421	477

Appendix B — Disciplinary Actions by License Type

Table B1
Disciplinary Actions for Barbers

Nature of Complaints	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Application Denied	3	0	0	0	0
Application Expired	0	0	2	1	0
Cease & Desist Order	25	17	14	6	6
Combined w/other case for action	9	11	16	9	8
Final Agency Order	0	0	1	0	0
Injunction	0	5	3	0	0
Letter of Admonition	11	5	7	3	14
Revocation	1	0	0	0	0
Stipulation	13	2	9	8	11
Voluntary Surrender	1	0	1	0	0
Total Disciplinary Actions	63	40	53	27	39
Dismiss with Confidential Letter of Concern (LOC)	11	21	15	23	11
Dismiss with Letter of Guidance	0	0	0	0	3
Dismissed	29	17	9	13	9
Dismissed Application	0	0	0	0	1
Total Dismissals	40	38	24	36	24

Table B2
Disciplinary Actions for Cosmetologists

Nature of Complaints	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Application Denied	7	1	6	0	1
Application Expired	0	0	4	0	8
Cease & Desist Order	15	18	9	10	6
Combined w/other case for action	22	21	35	51	18
Confidential Letter of Admonition	0	0	1	0	0
Final Agency Order	0	2	0	1	0
Injunction	0	2	1	2	0
Letter of Admonition	61	19	43	63	65
Revocation	4	0	1	0	0
Stipulation	48	33	26	27	36
Suspension	0	1	1	3	1
Voluntary Surrender	1	0	1	1	2
Total Disciplinary Actions	158	97	128	158	137
Dismiss with Confidential LOC	198	124	179	126	112
Dismiss with Letter of Guidance	0	0	0	2	0
Dismissed	91	55	55	50	46
Total Dismissals	289	179	234	178	158

Table B3
Disciplinary Actions for Estheticians

Nature of Complaints	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Application Denied	1	0	0	1	0
Application Expired	0	1	0	1	1
Cease & Desist Order	7	5	3	6	2
Citation Issued	0	0	0	0	0
Combined w/other case for action	17	8	19	11	11
Confidential Letter of Admonition	9	0	0	8	0
Injunction	0	0	1	0	2
Letter of Admonition	0	5	14	0	20
Revocation	1	0	1	0	0
Stipulation	7	2	3	6	5
Voluntary Surrender	0	0	0	0	1
Total Disciplinary Actions	42	21	41	33	42
Dismiss with Confidential LOC	27	47	32	50	40
Dismiss with Letter of Guidance	0	0	0	2	1
Dismissed	31	23	18	28	36
Total Dismissals	58	70	50	80	77

Table B4
Disciplinary Actions for Hair Stylists

Nature of Complaints	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Application Denied	1	0	0	0	0
Application Expired	0	1	1	0	0
Cease & Desist Order	4	1	3	4	0
Citation Issued	0	0	0	0	0
Combined w/other case for action	6	6	8	3	2
Confidential Letter of Admonition	2	0	0	0	0
Injunction	0	0	1	0	0
Letter of Admonition	0	3	5	10	6
Revocation	0	0	1	0	0
Stipulation	5	4	2	7	2
Suspension	0	0	1	0	0
Total Disciplinary Actions	18	15	22	24	10
Dismiss with Confidential LOC	7	24	7	22	12
Dismissed	15	14	1	10	4
Total Dismissals	22	38	8	32	16

Table B5
Disciplinary Actions for Nail Technicians

Nature of Complaints	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Application Denied	1	0	0	1	0
Application Expired	0	0	1	2	1
Cease & Desist Order	29	10	7	12	1
Combined w/other case for action	50	24	36	54	28
Final Agency Order	0	0	0	1	0
Injunction	0	0	1	0	0
Letter of Admonition	13	3	15	12	25
Revocation	1	0	0	0	0
Stipulation	8	2	1	3	6
Suspension	0	0	1	0	0
Voluntary Surrender	0	0	1	0	0
Total Disciplinary Actions	102	39	63	85	61
Dismiss with Confidential LOC	10	25	10	26	12
Dismissed	21	15	11	12	11
Dismissed Application	0	0	0	0	2
Total Dismissals	31	40	21	38	25

Table B6
Disciplinary Actions for Shop Registration

Nature of Complaints	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Application Denied	0	0	0	0	1
Application Expired	0	0	1	0	0
Cease & Desist Order	20	22	41	26	29
Citation Issued	3	1	0	0	0
Combined w/other case for action	32	33	46	25	13
Final Agency Order	0	1	0	2	0
Injunction	0	0	3	0	1
Letter of Admonition	50	54	107	113	85
Revocation	0	0	2	0	0
Stipulation	104	68	81	90	72
Suspension	0	1	0	0	0
Voluntary Surrender	1	0	1	2	3
Total Disciplinary Actions	210	180	282	258	204
Dismiss with Confidential LOC	165	95	231	86	169
Dismiss with Letter of Guidance	0	0	0	8	3
Dismissed	115	87	66	63	52
Dismissed Application	0	0	0	0	1
Total Dismissals	280	182	297	157	225