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Pennsylvania Waives Certain Requirements for Cosmetology Students and Cosmetology Schools During COVID-19 Emergency

The coronavirus pandemic has had a significant impact on the entire cosmetology industry. Affected individuals include those who are or were in the process of training to become licensed cosmetologists or one of the following related “limited license” types: estheticians, nail technicians and natural hair braiders. Cosmetology salons and schools in Pennsylvania were closed for most of March 2020 thru July 2020 due to COVID-19.

Many cosmetology students were unable to complete in-person hours during the closure. This unfortunate circumstance has, in turn, delayed these individuals from taking the required licensure examination. That delay prevented them from entering the workforce in their chosen occupation.

Cosmetology schools that are now in the process of reopening face significant hurdles. There are critical health and safety requirements that must be met.

Limit on the Number of Credit Hours Per Day/Week: The Cosmetology Law and regulations limit the number of hours cosmetology students may earn each day and per week. For day-time students in a licensed school of cosmetology, the maximum allowance is eight hours of credit per day and 40 hours of credit per week. Night-time students are permitted to earn a maximum of four hours per night and 20 hours per week. An increase in the maximum allowable earned hours per day and week for both day-time and night-time students would benefit both cosmetology schools and their students. Specifically, **the Department proposed increasing these maximums for day-time students to 10 hours per day and 50 hours per week, and for night-time students to five hours per day and 25 hours per week. The Governor approved this request to allow school to increase the maximum hours.**

Requirement That Training Be Completed in Four Years: Additionally, again as a result of school closures, there may be some students who were, or will be, unable to complete their hours of training within the four years required by the Cosmetology Law. Absent a waiver, these students would be required to start their entire education from the beginning, a result that would carry with it several negative consequences – not the least of which would be having to pay tuition for the second time. To allow those students who were unable to complete their education during the pandemic, **the Department requested that the mandatory four-year period be increased to five years. The Governor approved this request.**

Square Footage Requirements: Another challenge cosmetology schools face is a shortage of classroom space resulting from adherence to social distancing requirements that require six feet of separation. Due to the nature of cosmetology instruction in general, there is a limit to the amount of subject matter that can be taught virtually. Moreover, Pennsylvania is one of the few states that does not require applicants to take and pass a practical examination in order to become licensed. Therefore, it is critical that the practical aspects of cosmetology training be taught in a traditional manner.

For each cosmetology school, the physical location itself is licensed by the Board and is subject to the requirements set forth in the Cosmetology Law and Board's regulations. A school license is valid only for the location stated on the license. The regulations also contain a minimum square footage requirement of 2,750 square feet for a school with a 25-student maximum enrollment.

Normally, cosmetology schools are inspected and licensed not only for a specific address but also for the classes that will be offered at that location (there are space, equipment and other requirements). **The Department requested – and the Governor granted – a waiver to suspend square footage requirements for temporary classroom space only** so that schools may secure additional temporary space to accommodate social distancing. This will permit schools to use temporary classroom space in addition to the licensed school space. Schools must notify the Cosmetology Board in writing of the address of any temporary locations, and the instruction that will occur at such space (e.g. theory, practical).

The temporary classroom space will still have to meet all the other requirements – other than the square footage requirements – as set forth in the Board's regulations and will be subject to inspection to ensure it meets the safety and equipment standards. This would allow, for example, a school located in a shopping center to rent temporary space located in the same shopping center for classrooms. Suspending the square footage requirements will increase a school's ability to finish training the students who should have graduated by now, and at the same time, begin to train newly enrolled students.

These suspensions and waivers shall extend for the duration of the COVID-19 emergency plus an additional 90 days after the emergency ends.