

Office of Regulatory Management
Economic Review Form

Agency name	Board for Barbers and Cosmetology
Virginia Administrative Code (VAC) Chapter citation(s)	18 VAC 41-20
VAC Chapter title(s)	Barbering and Cosmetology Regulations
Action title	Implementation of 1,000-hour Cosmetology Curriculum
Date this document prepared	July 9, 2024 (revised September 6, 2024)
Regulatory Stage (including Issuance of Guidance Documents)	Guidance Document

Cost Benefit Analysis

Complete Tables 1a and 1b for all regulatory actions. You do not need to complete Table 1c if the regulatory action is required by state statute or federal statute or regulation and leaves no discretion in its implementation.

Table 1a should provide analysis for the regulatory approach you are taking. Table 1b should provide analysis for the approach of leaving the current regulations intact (i.e., no further change is implemented). Table 1c should provide analysis for at least one alternative approach. You should not limit yourself to one alternative, however, and can add additional charts as needed.

Report both direct and indirect costs and benefits that can be monetized in Boxes 1 and 2. Report direct and indirect costs and benefits that cannot be monetized in Box 4. See the ORM Regulatory Economic Analysis Manual for additional guidance.

Table 1a: Costs and Benefits of the Proposed Changes (Primary Option)

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>This guidance document provides guidance to regulated parties and the public regarding the implementation of the 1,000-hour cosmetology curriculum which will become effective on September 1, 2024. The document establishes protocols for students already enrolled in a 1,500-hour cosmetology curriculum and outlines school responsibilities in meeting the 1,000-hour cosmetology program requirements.</p> <p>The new guidance does not impose any new requirements.</p> <p>The guidance provides that:</p> <p>Cosmetology schools currently approved by the Board must meet the new minimum standards for curriculum in 18VAC41-20-210.D and performances in 18VAC41-20-220.E. All schools must submit updated school packets, including instructional hours, course syllabus, detailed course outline, and breakdown of hours and performances to the Board by September 1, 2024.</p> <p>Cosmetology schools currently approved by the Board may continue to enroll new students in the 1,500-hour program approved by the Board until August 31, 2024.</p> <p>Students taking the minimum 1,500-hour program and students enrolled prior to the school’s new minimum 1,000- hour curriculum must complete the program no later than August 31, 2026.</p> <p>SCHEV-certified schools may receive preliminary approval of the new 1,000-hour curriculum upon submission of the revised syllabus and detailed course outline showing conformance to the Board's regulatory requirements.</p> <p>Schools may not teach the minimum 1,000-hour curriculum until September 1, 2024. Schools may not teach the minimum 1,000-hour curriculum until approved by the Board. Schools failing to meet any of the required deadlines will be out of compliance and could face disciplinary action.</p> <p>9/6/24 Note: Following conclusion of the public comment period, a clarifying statement was added: “Schools may choose to continue to teach a 1,500-hour curriculum, but must still submit a revised curriculum by September 1, 2024.” The added statement clarifies a provision of the submitted proposed guidance.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>

	(a) N/A	(b) N/A
(3) Net Monetized Benefit	N/A	
(4) Other Costs & Benefits (Non-Monetized)	N/A	
(5) Information Sources	N/A	

Table 1b: Costs and Benefits under the Status Quo (No change to the regulation)

(1) Direct & Indirect Costs & Benefits (Monetized)	Not applicable.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Net Monetized Benefit	N/A	
(4) Other Costs & Benefits (Non-Monetized)	N/A	
(5) Information Sources	N/A	

Table 1c: Costs and Benefits under Alternative Approach(es)

(1) Direct & Indirect Costs & Benefits (Monetized)	Not applicable.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Net Monetized Benefit	N/A	

(4) Other Costs & Benefits (Non-Monetized)	N/A
(5) Information Sources	N/A

Impact on Local Partners

Use this chart to describe impacts on local partners. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 2: Impact on Local Partners

(1) Direct & Indirect Costs & Benefits (Monetized)	Not applicable.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Assistance	N/A	
(5) Information Sources	N/A	

Impacts on Families

Use this chart to describe impacts on families. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 3: Impact on Families

(1) Direct & Indirect Costs & Benefits (Monetized)	Not applicable.
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(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Information Sources	N/A	

Impacts on Small Businesses

Use this chart to describe impacts on small businesses. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 4: Impact on Small Businesses

(1) Direct & Indirect Costs & Benefits (Monetized)	See Box #3.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	<p>Cosmetology school licenses are issued to business entities, some of which may fall within the meaning of “small business” as defined in § 2.2-4007.1 of the Code of Virginia. To the extent any licensed schools are small businesses, the guidance issued by the Board would affect small businesses.</p> <p>As noted in Table 1(a), this guidance does not impose any new requirements.</p>	
(4) Alternatives	N/A	
(5) Information Sources	N/A	

Changes to Number of Regulatory Requirements

Table 5: Regulatory Reduction

For each individual action, please fill out the appropriate chart to reflect any change in regulatory requirements, costs, regulatory stringency, or the overall length of any guidance documents.

Change in Regulatory Requirements

VAC Section(s) Involved*	Authority of Change	Initial Count	Additions	Subtractions	Total Net Change in Requirements
N/A	(M/A):	N/A	N/A	N/A	N/A
	(D/A):	N/A	N/A	N/A	N/A
	(M/R):	N/A	N/A	N/A	N/A
	(D/R):	N/A	N/A	N/A	N/A
				Grand Total of Changes in Requirements:	(M/A): N/A (D/A): N/A (M/R): N/A (D/R): N/A

Key:

Please use the following coding if change is mandatory or discretionary and whether it affects externally regulated parties or only the agency itself:

(M/A): Mandatory requirements mandated by federal and/or state statute affecting the agency itself

(D/A): Discretionary requirements affecting agency itself

(M/R): Mandatory requirements mandated by federal and/or state statute affecting external parties, including other agencies

(D/R): Discretionary requirements affecting external parties, including other agencies

Cost Reductions or Increases (if applicable)

VAC Section(s) Involved*	Description of Regulatory Requirement	Initial Cost	New Cost	Overall Cost Savings/Increases
N/A	N/A	N/A	N/A	N/A

Other Decreases or Increases in Regulatory Stringency (if applicable)

VAC Section(s) Involved*	Description of Regulatory Change	Overview of How It Reduces or Increases Regulatory Burden
N/A	N/A	N/A

Length of Guidance Documents (only applicable if guidance document is being revised)

Title of Guidance Document	Original Word Count	New Word Count	Net Change in Word Count
Implementation of 1,000-hour Cosmetology Curriculum	Zero (0). This is a new guidance document.	514 words (Two pages)	+514 words (Two pages)

*If the agency is modifying a guidance document that has regulatory requirements, it should report any change in requirements in the appropriate chart(s).