

Executive Summary

Purpose of Review

This report has been prepared according to Utah Code title 13-1b, which governs the Office of Professional Licensure Review (OPLR)'s periodic review of professions in Utah. The review assesses cosmetology licensure relative to review criteria, including consumer health, safety and financial welfare, market access, and economic opportunity. The recommended changes will improve consumer safety, expand economic opportunity, and address emerging areas in the industry. OPLR reviewed over 100 relevant pieces of literature, surveyed all licensees in the state, interviewed current students and licensees, and engaged with public and private beauty schools, business owners, and investigators at the Division of Professional Licensing.

Cosmetology was reviewed in part because it can provide economic opportunity, especially for lower-income populations or those who do not wish to pursue a college degree. With 56,766 licensees,¹ **cosmetology has the most licensees of any industry in the state**, makes up a significant portion of the Utah economy and workforce, and thus is **an avenue of economic opportunity for many Utahns**.

Key Findings

Context: Cosmetology is most often a part-time, supplemental source of income for licensees choosing not to pursue a college degree, making it important for economic mobility. Licensees are overwhelmingly female (95%), typically do not have a 4-year college degree (86%), and 46% of those licensed in the last decade were Pell-eligible, indicating lower income.² The average educational debt incurred by those licensed in the last decade was \$6,300, with an average of \$4,000 still outstanding.³ According to OPLR's licensee survey, the vast majority work part-time, with many more active licensees working zero hours (32%) than work more than 30 hours (17%).⁴ The U.S. Bureau of Labor Statistics estimates that cosmetologists earned a median wage of \$16.87 per hour in 2023.⁵

Given the relatively high cost of training and low average earnings for cosmetology, **it is critical that state-mandated training for licensure is narrowly focused on consumer safety and not overly burdensome for new entrants** into the field.

Utah ranks 6th highest among all states, with 52 cosmetologists per 10,000, indicating that consumers have sufficient access to services.⁶

¹ [DOPL Active Licensee Count](#), accessed December 18, 2024.

² OPLR Survey of Utah Cosmetology Licensees, May 2024.

³ Ibid.

⁴ Ibid.

⁵ [U.S. Bureau of Labor Statistics \(2024\)](#).

⁶ [U.S. Census Bureau \(2022\)](#).

Consumer safety: Services provided by cosmetologists and related professionals do contain potential risks to consumers that merit regulation. These harms are usually low to moderate in severity and most often temporary, with a small probability of more severe or permanent harms.

- While most U.S. states have coalesced around the current model of 1,000 to 1,800 hours for the main cosmetologist/barber license, **OPLR finds no rigorous evidence based on consumer safety to support the status quo** licensing structure and entry requirements.
- The current training **does not always align with the relative risk of harm for consumers**, with some areas of significant ‘over-training’ beyond that required for consumer safety (e.g., students doing over 100 haircuts and thermal stylings), and some areas of under-training creating safety concerns for consumers (e.g. students doing no eyelash perms).⁷
- Medical training benchmarks show that **medical practitioners in training perform between 5 and 45 hands-on repetitions** while in training to ensure patient safety in higher-risk procedures.⁸
- There is evidence that the **quality of instructors and apprenticeship supervisors is inconsistent** and that required hours may not be utilized effectively to teach students.

Access: The current licensing structure creates unnecessary burdens on new entrants by maintaining broad licenses with high, non-specific hours requirements with some elements unrelated to consumer safety.

- Because licensing is framed around **broad licenses with non-specific hours requirements**, training programs have discretion in how students are trained. This structure allows training programs to require more training than necessary for a student’s chosen line of work (e.g., a full master esthetics license for someone wanting to perform just laser tattoo removal).
- Training programs **may require excessive repetitions of some services** (e.g., hair).
- On net, **Utah’s hours requirements impose unnecessary burdens on new entrants in the form of higher hours and higher-cost than necessary** to ensure consumer safety.

When students are required to do more repetitions of a service than is needed to perform that service safely, the State imposes an unnecessary burden to entering the occupation. Licensing requirements unrelated to consumer safety result in economic inefficiencies.⁹ OPLR estimates that **Utah’s current licensing policy compelled licensees to spend over 26 million hours in training beyond what is required for them to learn to perform their jobs safely**. While some

⁷ OPLR reviewed the service count sheets for one public and one private cosmetology program.

⁸ See, for example, [Yeo et al. \(2015\)](#); [Uribe et al. \(2004\)](#); [de Oliveira Filho \(2002\)](#); and [Accreditation Council for Graduate Medical Education \(2017\)](#).

⁹ [Knepper et al. \(2022\)](#) and [Occupational Licensing: A Framework for Policy Makers, The White House \(2015\)](#).

may have chosen to pursue the extra training on their own, the current licensing law likely generates significant economic waste for students and licensees.

Conversely, when students are not getting enough repetitions of a service for consumer safety through state-mandated training, consumers can be harmed. Utah's training regime demonstrates both issues—excessive requirements in many areas that create unnecessary barriers to entry and under-training in a few areas that put consumers at risk.

The current licensing regime harms students in that it compels *all* students to take longer, costlier training programs than they might otherwise choose. This raises costs for students who become licensed, which flows through to the consumer as higher prices for cosmetic services. The current regime also directly harms consumers who may be physically hurt by an underprepared licensee (e.g., impaired vision from poor application of eyelash extensions).

State licensing sets a minimum standard for safety—not a ceiling. Beauty schools can compete in the marketplace to attract students for higher levels of training beyond the state-mandated license in the same way that culinary programs provide training well beyond the food handler permit required by law. Those who argue for licensing requirements above those required for safety are, in essence, requesting that the State compel students to purchase more training than they may otherwise choose. Instead, the State should remove such artificial protections and allow beauty schools to compete on the caliber and price of their instruction, which will, in turn, lower costs for students and consumers.

Recommendations

- OPLR recommends the creation of two pathways for licensure: 1) a traditional path leading to a full license with a broad scope of practice, and 2) an 'endorsement' structure for individuals to choose narrower licensure a la carte, allowing for more flexibility and lower cost for the new entrant.
- OPLR recommends establishing 'minimum service counts' (a required number of hands-on procedures performed while in training) to ensure consistency in hands-on training, increase safety guardrails for all licensees and consumers, and limit instances of over-training above that required for consumer safety.
- OPLR recommends increasing training hours for instructors and aligning apprenticeship and school requirements to better prepare licensees, especially for services with relatively higher risk to consumers (e.g., eyelash extensions).
- Hour requirements for each license or endorsement should be established based on the time required for 1) teaching theory required for safety and 2) minimum hands-on training repetitions required for safety for each service included in the scope of practice.

By applying these recommendations, OPLR estimates that a **hair-related license (e.g., 'hair design')** should require a range of **460-800 hours**, and a **skin-related license (e.g.,**

'esthetics') should require a range of **640-1000 hours**. The hours for other narrow-scope endorsements or stand-alone licenses such as nail technician, electrology, or laser tattoo removal should be built up in the same way.

Additional Considerations

- OPLR recommends legislators and lawmakers consider adjusting supervision requirements for laser tattoo removal and laser hair removal in UCA 58-1-506 to be consistent with the new licensing structure.
- The regulations of non-invasive body contouring should be clarified and designed to address potential physical, psychological, and financial harms.