



February 13, 2023

TO: Senators Brian J. Feldman, Cheryl C. Kagan, Augustine Malcolm, Benjamin Brooks, Mary Beth Carozza, Jason C. Gallion, Katie Fry Hester, Karen Lewis Young, Bryan W. Simonaire, Mary Washington, and Ron Watson

CC: Senator Pamela G. Beidle

RE: Comments on Senate Bill 423

POSITION: Support if amended

VIA EMAIL

Associated Skin Care Professionals, Associated Hair Professionals, and Associated Nail Professionals (the Associations) provide professional liability insurance, business resources, professional publications, and legislative and regulatory advocacy for more than 44,000 members nationwide.

The Associations express support for Senate Bill 423 (SB 423), which would create an eyelash extension services limited license in Maryland. Eyelids and the eye area are delicate, and services performed to and around the eyes require a trained, licensed professional equipped with proper education and in-depth knowledge of universal precautions and sanitation practices. Eyelash extensions are a specialized service that require specialized training.

However, our support is based upon our understanding that SB 423 addresses appropriate training requirements for someone new to human skin and hair. Sixty hours of education, as proposed in SB 423, is below the Association's standard of acceptable eyelash extension training for those new to working on human skin and hair.

The Associations posit that eyelash extension training programs should combine classroom instruction and practical experience. Theory centered on public safety and proper application combined with hands-on training is required to ensure students receive sufficient fundamental instruction before providing services on the public. Such a program would call for a robust curriculum and a training program longer than 60 hours. Tennessee, for example, introduced [House Bill 103](#) that would require 300 hours of eyelash extension education. The Associations believe that basic eyelash extension training should cover the topics listed below, of which 60 hours would not successfully cover:

1. Recognizing infectious or contagious diseases of the eye and allergic reactions to materials
2. Proper sanitation and sterilization practices
3. Occupational health and safety practices
4. Trichology
5. Eyelash extension application procedures:
 - a. Eyelash extension products
 - b. Preparing the client
 - c. Eyelash bonding
 - d. Eyelash extension isolation and separation procedures
 - e. Eyelash extension framing and troubleshooting
 - f. Eyelash extension aftercare

6. Eyelash extension removal procedures
7. Ethics and knowledge of Maryland cosmetology laws and rules
8. Marketing tips and business practices
9. Eyelash extension practice on mannequins and live models

By contrast, the bill, as drafted, would pose unreasonable burdens for individuals who already have a Maryland cosmetology, senior cosmetology, or esthetics license by requiring them to go back to school for 60 hours if they wish to perform eyelash extension services. The Associations believe this amount of further education is unnecessary because these licensed professionals already possess robust knowledge of skin safety and sanitation practices.

As such, we recommend that licensed cosmetologists, senior cosmetologists, and estheticians be exempt from the 60-hour training requirement and, instead, be required to complete appropriate continuing education in eyelash extensions to perform the service. A simple amendment to SB 423 to provide for such exemption language would offer clarity and be appreciated. Sample language could be inserted on page 7 after (C) (3):

- (4) Or, if person who is a licensed cosmetologist, senior cosmetologist, or esthetician desires an eyelash extension services limited license, they shall submit an application to the board on the prescribed form. The application must be accompanied by:
- (1) A nonrefundable, nontransferable application fee as set by the board;
 - (2) A copy of their cosmetology, senior cosmetology, or esthetics license; and
 - (3) Satisfactory proof that the applicant has completed and passed a board-approved continuing education course in eyelash extensions.

This option would allow licensed cosmetologists, senior cosmetologists, and estheticians who want to begin offering eyelash extension services, or who are already performing the service, a pathway to gain the limited license without returning to school or incurring a pause in practice and income.

In conclusion, the Associations support SB 423 and the effort to minimize consumer risk factors when receiving eyelash extension services in Maryland. However, we ask that you amend the current bill language to increase the number of training hours required to receive an eyelash extension services limited license and consider the proposed cosmetologist, senior cosmetologist, and esthetician exemption.

Please contact me at erinh@abmp.com if you have comments or questions.

Sincerely,



Erin Haden, Government Relations Coordinator

Associated Skin Care Professionals
Associated Hair Professionals
Associated Nail Professionals