

## **Testimony in Opposition to Senate Bill 348**

AN ACT concerning cosmetologists and cosmetology; exempting hair threading from the practice of cosmetology; requirements; amending K.S.A. 65-1901 and 65-1928 and repealing the existing sections.

**Presented to the Senate Committee of Public Health and Welfare  
By David Yocum, Chairperson of the Kansas Board of Cosmetology**

**February 02, 2022**

Chairperson Hilderbrand and Members of the Committee:

Thank you for letting me provide testimony in opposition to SB 348

The mission of the Kansas Board of Cosmetology (Board) is to protect the health and safety of the consuming public by licensing qualified individuals and enforcing standards of practice and sanitation. The Board of Cosmetology (Board) licenses over 26,000 individual practitioners, instructor/trainers, apprentices, and holders of temporary permits in cosmetology, electrology, esthetics, nail technology, and body arts. The Board licenses almost 5,000 facilities and schools in those same professions, including tanning.

Because of the impact on the public's health and safety, the Board requests you leave the practice of threading under the Board's jurisdiction.

This bill would exclude hair threading from the jurisdiction of the Board. Hair threading is a method of removing unwanted hair from the eyebrows, upper lip, or other parts of the body. The threading technique involves the use of cotton thread. The thread is twisted and rolled along the surface of the skin entwining the hairs in the thread, which are then lifted quickly from the follicles. The bill, as introduced, would allow a person to use over-the-counter astringents, gels or powders, tweezers or scissors on the threaded area. This bill would be effective upon publication in the statute book.

According to the Milady Standard Cosmetology textbook,<sup>1</sup> the dermis<sup>2</sup> is comprised of two layers: the papillary or superficial layer, and the reticular or deeper layer. The papillary layer is the outer layer of the dermis, directly beneath the epidermis. Here you will find the dermal papillae, which are small, cone-shaped elevations at the base of the hair follicles. Some papillae contain looped capillaries, which are disturbed during the hair removal. This can cause a small drop of blood to rise to the surface of the skin and exposes the client/consumer to possible infection, and the practitioner to bloodborne pathogens. Other papillae contain small epidermal structures called tactile corpuscles, with nerve endings that are sensitive to the touch and pressure.<sup>3</sup> Knowledge, procedural practices and skill are necessary to prevent the spread of infection or disease.

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<sup>1</sup> 12th Edition (2012).

<sup>2</sup> Dermis is the vascular, thick layer of the skin lying below the epidermis and above the superficial fascia that contains fibroblasts, macrophages, mast cells, B cells, and sensory nerve endings and has an extracellular matrix composed of proteoglycans and glycoproteins embedded with collagen and elastin fibers. <https://www.merriam-webster.com/dictionary/dermis>, accessed February 21, 2019.

<sup>3</sup> A pictorial representation of the anatomy of the skin may be found at the following website: [https://www.hopkinsmedicine.org/neurology\\_neurosurgery/centers\\_clinics/cutaneous\\_nerve\\_lab/patients/skin\\_anatomy.html](https://www.hopkinsmedicine.org/neurology_neurosurgery/centers_clinics/cutaneous_nerve_lab/patients/skin_anatomy.html).

Additionally, the Board is concerned with sanitation standards for both the practitioner and the facility. Although the bill would require the Kansas Department of Health and Environment to develop a brochure containing information about infection control techniques appropriate for threading, the individual would only be required to complete a self-test. That means the individual will not be subjected to an independent review of his or her knowledge, practice or skill in the implementation of sanitation and infection control techniques. Further, the facility where threading would be practiced is not subjected to any sanitation requirements, or any requirements for that matter, under the bill.

On behalf of the Board, I thank you for your time and consideration of our testimony as we seek to protect the consuming public. For all of the reasons stated above, the Board request the law not be changed to exclude threading from the definition of cosmetology.

Sincerely,

Nichole Hines, Vice Chair  
Kansas Board of Cosmetology