



Kansas Hospital
ASSOCIATION

TO: Joint Committee on Administrative Rules and Regulations

FROM: Tara Mays, Vice President State Legislative Relations

DATE: July 9, 2021

RE: Repeal of K.A.R. 69-6-3

On behalf of the Kansas Hospital Association (KHA) members, we appreciate the opportunity to provide comments regarding the repeal of K.A.R. 69-6-3 as proposed by the Kansas Board of Cosmetology.

K.A.R. 69-6-3 requires that cosmetologists must work in a licensed salon but outlines exceptions for those working in a nursing home, hospital, or home of an “invalid.”

Currently, we have hospital facilities that handle the issue in a variety of ways. For example, some may transport patients to licensed salons, and some allow a licensed cosmetologist to come into the facility for the purpose of providing these services.

KHA supports the ability of hospitals and adult care homes to allow for cosmetology services as it works best in the communities where those facilities are located. In Kansas, we know that what works in one area of the state may not be the best solution in other areas. Each hospital, just as each Kansas community, has its own unique structure and practices related to these important services; allowing that flexibility means patients have better options in getting these services while allowing providers and hospital administrators to focus on the patient's health outcomes.

We believe that the current provisions, supported through K.A.R. 69-6-3, allow hospitals and nursing facilities to have flexibility in finding solutions that work well for the facilities, the healthcare staff, the providing cosmetologists, and most importantly, work well for patients and their families.

Requiring Kansas hospitals and nursing homes to meet salon licensing requirements will add regulatory hurdles and take focus away from patient care.

We would ask that K.A.R. 69-6-3 not be repealed at this time. Thank you so much for considering our written comments regarding the repeal of K.A.R 69-6-3.