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South Carolina
Department of Labor, Licensing and Regulation

Board of Cosmetology



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RE: Board Guidance of Transfer of Program Hours

The Board wishes to restate and clarify its guidance regarding questions that have recently been raised pertaining to allowing a student who has received training hours on a particular subject while enrolled in one program, such as nail technology, esthetics or cosmetology, to receive credit for some of that training when they enroll in a subsequent program, so that they are not taking hours in the subsequent program that duplicate what they have already learned.

Allowing credit for previously earned hours is ONLY to eliminate double training between credentials, and credit is not to be awarded on a total hour for hour basis – that is – all 300 hours of training for a nail technology program cannot be given to a student subsequently enrolled in a cosmetology program to reduce their cosmetology training hours to 1200. Student are required by Board regulation to obtain a determined number of hours of training in specific areas of practice. Providing credit based on total hours taken rather than based on duplicated subject matter not only contravenes the regulations establishing the board required curricula, but also short changes the student and most importantly, puts the public at risk as the student may not be obtaining the training deemed necessary to ensure their ability to practice competently.

While schools were and are given the ability to make their own determinations as to how much credit should be given for transferring hours to avoid duplicate training, the schools were never approved and are not approved to fail to provide the required number of training hours to students in accord with the curriculum requirements.

The Board therefore is restating its position that credit can only be given for hours that are **duplicate or have overlap** between programs, that the total number of training hours of another credential cannot be used to reduce the number of training hours for the subsequent credential on a total hour for hour basis, and that no credit can be given for courses that are taught that are outside the scope of practice, such as for advanced training in services that are outside the Board's jurisdiction or authority.

The Board has developed and is providing to schools an updated list of suggested hours for which it has determined it is appropriate to give credit when a student seeks to obtain a new credential. The schools are still free to make their own determinations, but as always, those determinations must be made keeping in mind the required training hours established by the Board for each discipline. The student must receive the required number of hours in each specific area within the program.

Additionally, if a student is granted credit from a previous program, the school must submit to the Board a copy of the training affidavit from the prior program along with the training affidavit for the subsequent program, and must indicate where designated on the training affidavit whether any of the hours in the program were earned in a previous program and credit transferred over.

The Board emphasizes that it is a school's obligation to train its students with the required number of training hours in the specific areas as designated by the Board, to ensure their ability to safely practice the profession, whether it is through direct instruction in that particular program, or through a transfer of credit for hours of instruction previously received.