



June 13, 2023

Hon. Dr. Miguel Cardona  
Secretary of Education  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington, D.C. 20202

Re: Docket ID ED-2023-OPE-0089

Dear Secretary Cardona,

My name is Robert Passage, and I am Chairman and CEO of Pivot Point International. We are a 60-year-old family business located in Chicago.

My father emigrated to the United States, where he realized the need for quality, standardized beauty education and – based on his experience as an award-winning hairdresser – developed our educational systems and started our company in 1962.

We provide education and related tools to the professional beauty industry, working with public schools, private schools and apprenticeship programs. In addition to the United States, our products and services are exported to educators and learners on six continents.

Over half of our employees, including most of our senior leadership team, are beauty school graduates. Almost 2/3 of our employees have been with us for over 10 years – many for over 25 years.

We are active in our industry and work with many groups and associations, including the American Association of Cosmetology Schools (AACCS).

We are submitting this comment because of our concern that the currently proposed “Gainful Employment” (GE) standards will severely impact our industry, our company, our employees, the hundreds of thousands of young people interested in pursuing a career in beauty, salon and barbershop owners, and all consumers.

The professional beauty industry – like most service industries – is struggling with not having enough staff. Many salons are now closed several days a week, and others must turn away customers.





Based on data that doesn't accurately represent our industry, our careers or our impact on people's lives and communities, the proposed GE standards would likely force half of private beauty schools to close.

The current employee shortage, plus the growing demand for beauty professionals (the profession is growing "much faster than average," according to the Bureau of Labor Statistics), has already created a crisis – without considering the implications of these new standards.

Furthermore, the public-school beauty education infrastructure is limited in capacity and isn't accessible geographically to many potential students. This means that these standards would ensure that our industry, already understaffed, could not meet future customer demand. Salons and barbershops would provide fewer services, reducing revenue, and many may be forced to close. And the U.S. population as a whole – who rely on salons and barbershops for services and community – would be less beautiful and less supported.

Gainful Employment would also jeopardize our company's ability to stay in business, meaning that our employees – including the third generation of my family working here – would have to find new careers.

We urge you to reconsider a standard that would have devastating, far-reaching, and perhaps unintended consequences.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Passage", with a long, sweeping flourish extending to the right.

Robert Passage  
Chairman and CEO,  
Pivot Point International, Inc.

