

March 2, 2018



Dear Representative,

The sponsors and supporters of Substitute House Bill 189 assert that this bill will reduce student loan debt and help more Ohioans compete for quality jobs leading to career advancement. These individuals would also have you believe that there is wide consensus in the industry that supports the drastic changes in hours in requirements for a cosmetology license.

In reality, Substitute House Bill 189 has been driven by a few powerful players in the industry for their exclusive professional benefit. Dramatically lowering the hours requirements for cosmetology licensure is agreeable to the business models of large salons that have extensive training programs accompanied by sweeping non-compete clauses and of chain retail establishments with low retention rates that are looking to hire large numbers of minimally trained individuals at low wages. Meanwhile the small independently owned salons that comprise nearly two-thirds of the market in the state are not in a financial position to bear the burden of increased on the job training that would be required if the hours for licensure were reduced. Ohio already offers an alternative license for "hair design" that requires only 1,200 hours. Licensed cosmetologists and cosmetology students have expressed deep-seated concern that lowering current requirements would leave them without the competence and confidence necessary to pursue self-employment options while devaluing their time and financial investment in their professional licensure and education.

Ohio just took sweeping action in the last General Assembly to align our licensing requirements with the 24 states that require 1,500 hours. The national consensus has coalesced around this recently implemented requirement. Forty-six states require at least 1,500 hours. Thirty states require between 1,500 and 1,600 hours, with only four states as outliers below 1,500 hours. Of these four states, only New York and Massachusetts have hours requirements as low as those proposed in HB 189. This reduction in licensing hours would negatively impact the portability of an Ohio license, drastically limiting reciprocity with other states for Ohio's cosmetologists. Furthermore, current law already provides that Ohio is open for business to out of state cosmetologists while protecting Ohioans. Right now, Ohio allows any individual with a cosmetology license in another state with substantially similar requirements to sit for practical and theory examinations and upon obtaining a passing score of 75 on each exam and one additional hour of training on human trafficking the individual qualifies for a basic license to practice cosmetology. Most other states also require substantially similar licensing requirements from one's home state to obtain a reciprocal license, the hours reduction proposed in HB 189 would be below all our surrounding states. Of Ohio's contiguous states, Kentucky, Michigan, and Indiana also have 1,500 hour requirements, while West Virginia requires 1,800 and Pennsylvania requires 1,250.

According to a study conducted in August 2016 by the American Institutes for Research and the Beauty Industry Working Group, Ohio's licensed cosmetology graduates enjoyed higher employment rates than their contemporaries in New York and Massachusetts, the only states with 1,000 hour requirements. This is based on data collected by the Bureau of Labor Statistics in May 2015 prior to the elimination of Ohio's manager license mandate. This study also revealed that the average student loan debt for a cosmetology student in Ohio is only \$1,074 and \$1,358 more than New York and Massachusetts, respectively. Contrary to proponent and sponsor testimony, reduced curriculum hours do not substantially lower the cost of student loan debt.

The Texas legislature recently rejected a similar proposal to HB 189. In Arizona, the Professional Beauty Association has disengaged from the FBIC's legislation to lower their hours requirement to 1,000 hours. Furthermore, Pivot Point and Milady, the leading curriculum providers in the industry, have both withdrawn their support for the Future of the Beauty Industry Coalition following the FBIC's decision to pursue 1,000 hour requirement. Pivot Point has noted that the FBIC's proposal and supporting research for a 1,000 requirement is "flawed and lacking in critical information... doesn't take into account important factors such as career longevity".

While we were not consulted prior to the introduction of HB 189 and not invited to the subsequent interested party meetings, we met Representative Roegner at the end of November to discuss her bill. We are therefore extremely disappointed once more that we were not even informed of the changes being sought prior to the sudden introduction of the sub bill in a hearing in which notice was provided barely 24 hours in advance.

We request that legislators vote against Substitute House Bill 189 and take a stand against big businesses seeking to manipulate Ohio law to their benefit and to the detriment of Ohio licensees and small, largely female owned and staffed businesses.

Respectfully,

Sue Carter Moore
President, Ohio Association of Cosmetology Schools
President Emeritus Salon Schools Group
Licensed Cosmetology Instructor

Brenda Holsey
President, Ohio Association of Beauticians
Licensed Cosmetologist

Nancy Brown
President, Brown Aveda Institutes
On Behalf of Ohio's Aveda Schools and Salons
Licensed Advanced Cosmetologist and Instructor