

Opposition Testimony
Am. Sub. HB 542
November 30, 2022

Senate Government Oversight and Reform Committee
Kristina Roegner, Chair Rob McColley, Vice Chair
Ranking Member Craig, Members Hoagland, Lang, Schaffer, Thomas

I am Sue Carter Moore, licensed Cosmetologist, 1966, licensed Cosmetology Instructor, 1970, and President Emeritus of Salon Schools Group, four cosmetology schools located in central Ohio. I know more about cosmetology education than anyone in this room and I have strong opposition to Am. Sub. HB 542.

Ohio law requires 1500 clock hours of cosmetology education. It does not say “except for public school cosmetology education”. The missing 375 clock hours are allocated to math, science, and other academic subjects. The 1125 clock hours public schools teach are often referenced in testimony. The statements “to bring private education in line with public education” and “public schools are already doing it” are not valid reasons for cosmetology education to be reduced to 1000 clock hours.

Where are the outcome assessments of Ohio public school cosmetology graduates?

How many public cosmetology school students who begin the course complete it?

How many public cosmetology school students sit for the licensure examination?

How many public cosmetology school graduates are working cosmetologists one, two, and three years after licensure?

Private cosmetology schools must provide that information to the US DOE, and to their accrediting agencies, in order to remain eligible for accreditation.

Where is the proof that public school cosmetology education is the model that should be adopted by Ohio?

I have asked those questions since the 131st General Assembly when then Representative Roegner introduced HB 227. Crickets.

Federal Financial Aid

During sponsor testimony for SB 133 on March 24, 2021 in the current General Assembly, Committee Member Sykes asked Senator Roegner if Federal Financial Aid eligibility would be affected by reduction in course lengths. Senator Roegner replied: “students would continue to be eligible”. That is true. However, a more robust response would continue: “the amount a student receives from a Pell Grant is determined by course length, and the status of a student as either independent or dependent”.

When Federal Financial Aid need is calculated based on less education, Pell Grant Awards are reduced, and the amount a student is permitted to borrow is reduced. I addressed that in my opponent testimony to SB 133 on May 19, 2021. My Financial Aid Administrator of 25+ years testified that day, and is providing testimony again today. Both Mr. Fiori and Senator Roegner are wrong when they say financial aid amounts will be the same for a 1000-hour program as a 1500-hour program.

Accredited schools are audited annually by their accrediting commission as well as the US DOE. You just don't fool around with either agency. I urge any and all of you to meet with Mrs. Halblaub and review our reports to the US DOE.

Administratively, What Would Law Change Mean For Schools?

In addition to the time and energy required to restructure current curricula, which must be completed before further accreditation procedures can occur, the timetable for notification and program approval on state and national accrediting levels may be substantial.

For a state-mandated change, accrediting approval is estimated at three to four weeks following the completion of all necessary paperwork. After receiving approval for the change from our accrediting agency, we must apply for approval of the new program with the DOE which could result in an additional delay of 90 to 120 days for student enrollment.

In regards to the assertion that schools may continue teaching the 1500-hour Cosmetology program: while we may apply for approval of a program up to 50% more than State approved licensure requirements, approval is neither guaranteed nor expedient. Estimated processing time for 1500-hour program approval is 12-18 weeks after all applicable documentation is submitted. After receiving approval for the change from the accrediting agency, the school must then apply for approval with the Department of Education, which could result in an additional delay of 90 to 120 days.

As an 1800-hour Advanced Cosmetology program would exceed the proposed reduced 1000-hour state licensure requirement by more than 50%, and since the program under the proposed legislation would not lead to licensure in Ohio, the current 1800-hour

Cosmetology program will not receive approval and cannot be offered.

During the program approval process for both the proposed reduced 1000-hour program and the projected 1500-hour program, we will not be permitted to enroll students, pending approval by all applicable accrediting agencies and the US DOE.

Delay in enrollment will impact the number of graduating students eligible for licensure under the recommended changes. Therefore, proponents of education reduction changes at the state level should take into consideration the nine to twelve months we anticipate required for program approval. Will private schools be able to survive?

Ohio currently has a 1200-hour Hair Designer License, which lacks skin care and nail technology components. Our Hair Designer course was approved in 2016. Since that time, only 16 individuals chose the Hair Designer course.

Impact of Ohio Franchised Chain Salons to Cosmetology Education

Many national chain salons continue to seek education reduction legislation to support their business models of selling franchises and charging “Royalty Fees”, to the detriment of an industry comprised largely of females and minorities.

I suggest that Hair Salon franchises are over-sold, and schools cannot supply the workforce necessary for their continued growth. You, committee members, are being asked to restructure entire career paths for the benefit of big business.

In Summation

Educational marginalization is defined both as an outcome and a process through which individuals or groups are systemically denied their right to acquire academic or social capabilities through education, that results in their exclusion from social institutions, civic processes and economies.

Are you prepared today to deny educational options for future cosmetologists, largely women and minorities? I ask: why do you think you should have the power to decide how much education an individual can choose to have?

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