



National Association of Barber Boards of America

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The Honorable Scott Wiggam
Chairman, Ohio House State and Local Government Committee
RE: Written Testimony in Opposition to House Bill 399

Dear Chairman Wiggam,

The National Association of Barber Boards of America (NABBA) was formed in 1926 for the purpose of maintaining professional standards and policies in the barbering industry. The mission of the NABBA is to support state licensing boards in their authority to protect the public as it applies to the practice of barbering by upholding health and safety standards and by maintaining the policies and protocols of the barbering profession. Collectively, NABBA member states stand for professional licensing, testing, and sufficient education and training that prepares and qualifies individuals to enter the workforce with a demonstrated mastery of basic competencies and skills sets designed to help protect the health and safety of the public in the performance of barbering services.

It has come to our attention that House Bill 399 calls for a serious reduction in the number of required barber training hours for licensure in Ohio. The NABBA has traditionally recognized the Ohio standards as some of the best in the country, but passage of HB 399 will place Ohio's standards in the lowest 20% group in the country. Our opposition to HB 399 is based on the following:

Unintended Consequences of Reducing Hours from 1800 to 1000 Hours

Licensure Mobility: A reduction in the education and training hours of Ohio barbers will create barriers to employment and decreased licensure mobility from state to state. Currently, Ohio barbers qualify for licensure through reciprocity or endorsement in 48 states and DC; conversely, barbers with 1000 training hours will qualify for licensure in only 10 states. Limiting licensee mobility from state to state, and therefore, a person's opportunity for employment *creates* unnecessary barriers.

Instruction & Practice: The average barbering program is 1500 hours, with a typical instructional distribution of 20% classroom theory and 80% hands-on practice. Given that theory education forms the foundation for practical applications and should not be reduced further, striking 800 hours of instruction will reduce students' hands-on practice time and their opportunity to master skills to a confident level of competency and safety.

H. B. No. 399 As Introduced

Sec. 4713.01. As used in this chapter:

(A) "Apprentice barber" means an individual who does not hold a barber license under this chapter and is engaged in learning or acquiring knowledge of the practice of barbering .

(B) "Apprentice cosmetologist" means an individual who does not a hold a practicing license under this chapter and is engaged in learning or acquiring knowledge of the practice of cosmetology, hair styling, esthetics, manicuring, or natural hair styling .

(A) and (B) of this section do not stipulate where or under whose direction an apprentice barber or cosmetologist is engaged in learning. This vague and ambiguous language creates loopholes for misuse and misinterpretation by individuals and entities looking to bend the law on a technicality.

Sec. 4713.01. As used in this chapter:

(R) "Disposable safety razor" means a shaving implement designed with a protective device that is intended to prevent the razor from cutting too deeply and reduce the risk of accidental cuts and that is designed for the cutting edge of the razor to be used on an individual one time and then discarded and not used for any other purpose. A "disposable safety razor " includes a razor with the handle and blade joined together or a razor with a blade attachment that can be detached from a handle.

Again, the language is ambiguous enough to allow for misinterpretation or deliberate misuse, most notably, "*or a razor with a blade attachment that can be detached from a handle*" because it could be interpreted to allow a cosmetologist to use a hair shaper (although not the correct tool) or changeable-blade razor for "hair removal" unless the language in (X) is revised. By the way, shaving is not a subject area of the cosmetology curriculum. See razor types below...



Safety Razor

Disposable Razor

Hair Shaper Razor w/guard

Conventional Straight Razor

Changeable-blade Straight Razor

(X) "Hair removal" includes, but is not limited to, tweezing, waxing, sugaring, using a disposable safety razor, and threading. "Hair removal" does not include electrolysis.

Suggested revision: "Hair removal" does not include electrolysis or men's facial shaving.

Thank you for your time and consideration of our opposition to Ohio HB 399.

Dr. Maura Scali-Sheahan
Chief Executive Officer