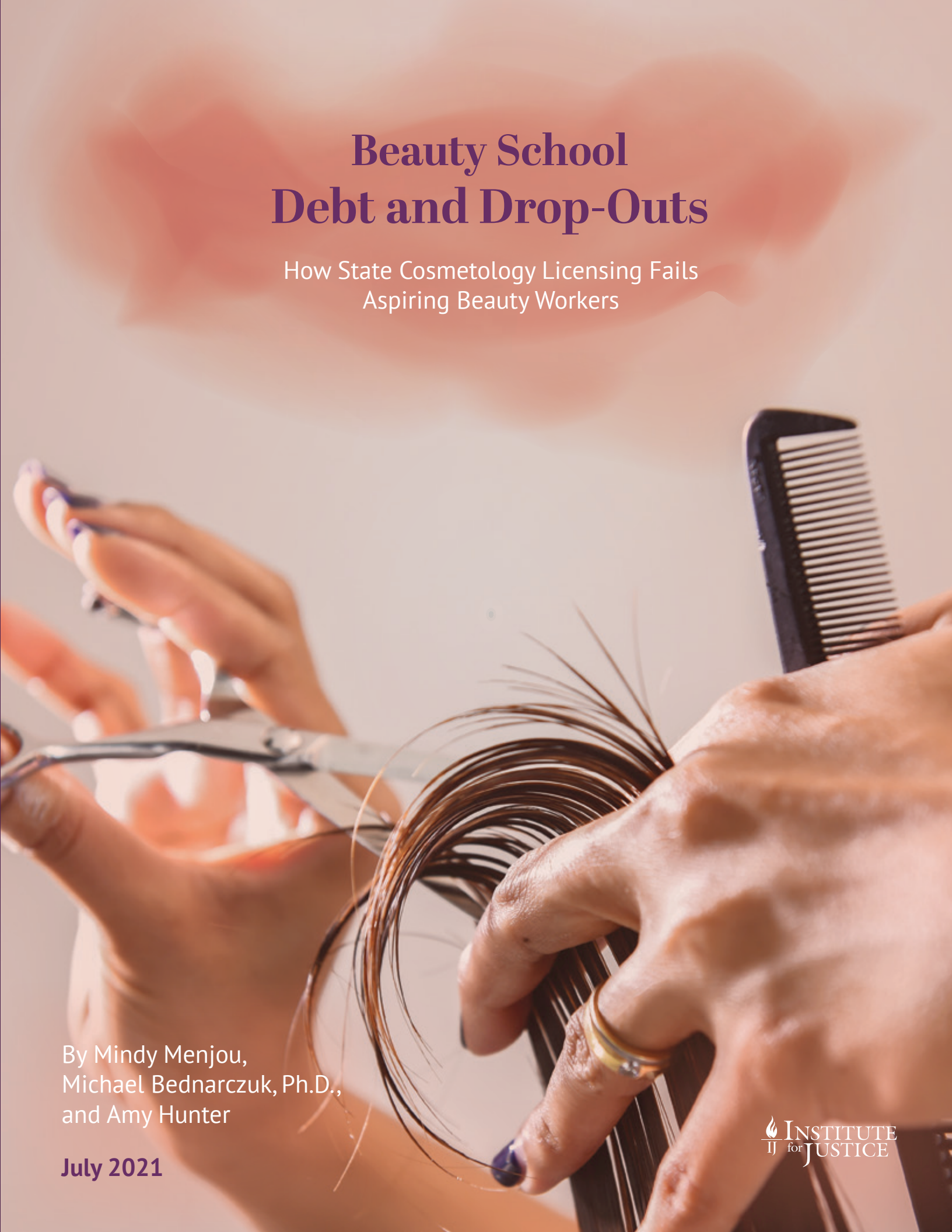
Beauty School Debt and Drop-Outs

How State Cosmetology Licensing Fails Aspiring Beauty Workers



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Contents

Executive Summary

In recent years, policymakers and scholars have focused increasing attention on overly burdensome occupational licensing laws. But while much research has examined the costs and benefits of occupational licensing in general, little work has systematically analyzed the experiences of people pursuing careers in cosmetology—one of the most widely and onerously regulated fields for lower-income workers. This study of federal educational data, including a deep dive into a large, and largely untapped, dataset on nondegree credentials and work experience programs, aims to fill that void.

Key findings include:

1

Cosmetology school costs more than

$16,000

on average

On average, the education required for cosmetology licensure costs more than $16,000 and takes about a year to complete for students graduating on time, and aspirants typically incur significant student loan debt to finance it. Cosmetology students borrowed over $7,300 on average.

2

Less than

1/3

of cosmetology students graduate on time

Cosmetology programs rarely graduate students on time, delaying—or even blocking—aspiring cosmetologists' entry into the workforce and increasing their debt burden. In the year with the highest on-time graduation rates, at least 15% of cosmetology schools graduated no students on time. On average, less than a third of cosmetology students graduate on time. And less than two-thirds graduate even with another year in school.

3

Cosmetologists earn only around

$26,000

a year on average

If aspiring cosmetologists graduate and become licensed, they frequently end up in jobs where they earn low wages and work long hours with very little time off, likely making it difficult to repay loans. On average, cosmetologists earn around $26,000 a year—less than restaurant cooks, janitors and concierges, occupations without burdensome state licensure or state-mandated education requirements.

Our data also suggest state licensure requirements largely explain why cosmetology school takes as long as it does. State-mandated instructional hours vary widely across the states, yet nearly all cosmetology program lengths in our dataset exactly match the hours required for licensure locally. When states have lowered hours requirements, cosmetology schools have generally followed suit.

Prior research indicates state cosmetology schooling requirements bear little relation to public health and safety—the justification for restricting occupational entry through licensing. Not only do many of the services cosmetologists provide, such as shampooing, conditioning, blow drying, curling and styling hair, pose little or no risk to the public, but average licensing requirements for cosmetologists outstrip those for other occupations that present greater inherent risks. Moreover, state-mandated cosmetology school curricula typically devote little time to health and safety.

Given the steep costs associated with completing the education required for cosmetology licensure, state lawmakers should look hard at whether cosmetology license requirements are justified—or whether they are, instead, unnecessarily preventing people from entering the field. At a minimum, states should exempt obviously safe niche services and reduce required hours for cosmetology licensure, as some states have already done. States should also expand the range of settings where haircuts and other traditional salon services may be offered. This could create job opportunities while helping meet demand for such services at home or outdoors, which have grown in popularity due to the COVID-19 pandemic.

An even better approach would be to consider whether cosmetology licensure is needed at all. As in the food service field, facility or salon licenses subject to inspections may protect the public just as well without serving as a barrier to occupational entry. People would still be free to attend cosmetology school to build their skills and marketability. Best of all, it would leave consumers, not the government, in charge of deciding whether a person is good at cutting hair or doing nails—as they should be.

Introduction

Overnight in 2018, hundreds of Minnesotans who made a living styling hair and applying makeup for weddings and proms were forced underground or out of business altogether. Their services were safe and popular and had been around for years without issue, but the Minnesota Board of Cosmetology suddenly decided they needed to be strictly regulated. To do so, the board reinterpreted the state's cosmetology licensing law to require a license—for the first time—for on-site hair and makeup for weddings, proms and other special events.[1]

Just to legally style hair and apply makeup, artists would have needed to become licensed cosmetologists. In Minnesota, that endeavor requires spending about a year in cosmetology school—and thousands of dollars in tuition—learning how to cut and color hair and provide other services that hair and makeup artists do not customarily provide. It also requires passing three exams and paying $285 in fees. On top of that, to provide services on location at wedding venues or other special events, artists would also have needed to become licensed salon managers—requiring three years of salon work experience, another exam and more fees—and obtain special event services permits. Before the board's reinterpretation, all that a special event hair and makeup artist needed to work was a kit, a mode of transport and a willing client.[2]

Just to legally style hair and apply makeup, special event hair and makeup artists would have needed to become licensed cosmetologists.

Minnesota special event hair and makeup artists are far from the only beauty industry workers required to attend cosmetology school before they can work. For example, nearly a dozen states require full cosmetology licensure for shampooers, including states like Iowa, Nebraska and South Dakota that have some of the most burdensome cosmetology licenses in the country.[3] Several states require the same for natural hair braiders, among them Idaho, Montana and Wyoming, which also have some of the most burdensome licenses.[4] And every state licenses cosmetologists, with cosmetology school being the primary route to licensure.[5]

In recent years, cosmetology licensing has attracted concern from across the ideological spectrum due to the costs it imposes on both workers and consumers.[6] But while much research has been done on the costs and benefits of occupational licensing in general,[7] little work has been done to systematically analyze the experiences of people pursuing cosmetology careers.

This study of federal educational data, including a deep dive into a large, and largely untapped, dataset on nondegree credentials and work experience programs, aims to change that. Key findings include:

- The education required for cosmetology licensure is expensive and time-consuming, and students typically incur significant student loan debt to finance it.
- Cosmetology programs rarely graduate students on time, delaying aspiring cosmetologists' entry into the workforce and increasing their debt burden.
- If aspiring cosmetologists graduate and become licensed, they frequently end up in jobs where they earn low wages with little time off, likely making it difficult to repay loans.

Our data also suggest state licensure requirements largely explain why cosmetology school takes as long as it does. State-mandated instructional hours vary widely across the states, and nearly all cosmetology program lengths in our dataset exactly match the hours required for licensure locally; schools generally do not offer more training than required. And when states have lowered hours requirements, cosmetology schools have typically followed suit.

Unfortunately, state cosmetology schooling requirements appear disconnected from the government's interest in protecting public health and safety—the justification for restricting occupational entry through licensing.[8] Many niche cosmetology services—like shampooing, conditioning, blow drying, curling, styling and braiding hair, as well as applying makeup—pose little or no health risk to the public. On average, licensing requirements for cosmetologists outstrip those for other occupations that present greater inherent risks. And, as mentioned, cosmetology license requirements vary greatly across the states, even though any risks are unlikely to vary geographically.

This study explores the costs associated with completing the education required for cosmetology licensure and finds they are steep. Given these costs, state lawmakers should take a hard look at whether cosmetology license requirements are justified—or whether they are, instead, unnecessarily holding back people trying to enter the field. As the economy recovers from the COVID-19 pandemic, removing needless regulatory barriers will help more people get back to productive work more quickly.

Background

Cosmetology is a vast and highly regulated industry in the United States. In 2019, almost three-quarters of a million people were working as cosmetologists nationwide.[9] And every single one of those people needed a license to do their job: Cosmetology is licensed by all 50 states and the District of Columbia.[10]

Requirements for cosmetology licensure are not trivial. Previous Institute for Justice research has found state licensing laws cost aspiring cosmetologists over a year—386 days—in education and experience on average (assuming a course of full-time study and on-time graduation). They also require aspirants to pass two exams and pay $177 in fees.[11] Among average licensing requirements for 102 lower-income occupations IJ studied for the 2017 edition of *License to Work*, these requirements ranked as the 30th most burdensome. And because cosmetologists are licensed everywhere in the United States, the occupation ranked as the fourth most widely and onerously licensed.[12]

Cosmetology licenses' education requirements impose heavy burdens, far heavier than those for some other occupations with far greater relevance to public health and safety. For perspective, entry-level emergency medical technicians are considered qualified to administer lifesaving first aid after only about a month's worth of training on average. This means the average cosmetologist must, to legally cut hair for pay, complete 11 times as much training as the average EMT.[13] In another example, tattooing is arguably riskier and more invasive than anything cosmetologists do, but some states (Alabama, California and Florida, for instance[14]) approve tattooists for work after only a few hours of training in bloodborne pathogens and communicable diseases.

Moreover, a recent review of state cosmetology licensing laws in 37 states and the District of Columbia finds, on average, only about 25% of mandated cosmetology training hours directly address health and safety concerns.[15] A report commissioned by a beauty industry trade group, the Professional Beauty Association, finds that several states' formal curricula devote less than 10% of required hours to health and safety, with some specifically mandating as little as 1%.[16]

In addition, cosmetology schooling requirements are applied so inconsistently as to call into question how narrowly targeted they are to protecting public health and safety. First, hours of required schooling vary greatly across the states even though risks associated with the occupation are unlikely to vary geographically. Education requirements range from 1,000 clock hours (about eight months) in New York[17] to 2,300 (nearly 18 months) in Oregon.[18] And in recent years, a few states have modestly trimmed required education hours for cosmetologists without apparent ill effect. Utah cut hours from 2,000 to 1,600 in 2013; West Virginia from 2,000 to 1,800 in 2013; Wisconsin from 1,800 to 1,550 in 2013; Nevada from 1,800 to 1,600 in 2015; Idaho from 2,000 to 1, 600 in 2018; and Nebraska from 2,100 to 1,800 in 2018.[19]

Internationally, some jurisdictions do not rely on licensing to regulate cosmetologists at all. Among them are the United Kingdom[20] and 12 of the 27 members of the European Union, including Spain and Poland.[21] Instead of licensing, the United Kingdom has voluntary certification,[22] which is when workers, of their own accord, earn credentials that are not required by the government as a condition of legal employment in an occupation.

Usually, these credentials are offered by private professional associations or other non-governmental organizations. In the United Kingdom, voluntary cosmetology certification is offered through the Hair and Barber Council, which maintains the UK Register of Qualified Hairdressers, a state-recognized list of hairdressers and barbers who have obtained certain qualifications and applied for membership on the list.[23] Membership allows workers to call themselves State Registered Hairdressers. Most SRHs earn the required qualifications by completing a cosmetology program.[24]

Second, state laws differ in the types of services that require a cosmetology license or another license administered by cosmetology boards, such as an esthetics or specialty license. This is particularly true of services distinct from cutting and chemically treating hair, such as shampooing, blow drying and styling, makeup artistry, eyebrow threading, eyelash extensions and natural hair braiding.[25]

Increasingly, states are recognizing that such niche services are obviously safe and do not require licenses. For example, as of 2021, 12 states have exempted eyebrow threaders from licensure as a cosmetologist or esthetician: Arizona, California, Colorado, Indiana, Louisiana, Maine, Minnesota, Mississippi, Nevada, North Dakota, Texas and Wisconsin.[26] Other states that have recently reformed cosmetology laws to de-license niche services include:

- Arizona (shampooers and hair stylists[27]; makeup artists[28]).
- Arkansas (shampooers, hair stylists and blow dry bars[29]).
- Minnesota (shampooers, hair stylists and makeup artists[30]); see "Cosmetology School Makes a Bad Match for Aspiring Makeup Artists" on page 14.
- Mississippi (makeup application and eyelash extensions[31]).
- Tennessee (shampooers[32]).
- Utah (shampooers and hair stylists[33]).
- Virginia (shampooers and hair stylists working in a licensed salon[34]; makeup artists[35]).
- West Virginia (shampooers[36]).

As of this writing, 30 states have exempted natural hair braiders from full cosmetology licensure, while a few have created separate—albeit less burdensome—licensing schemes for braiders.[37] Some states with separate braiding licenses have even begun to scale those back. For instance, Virginia created its braiding license in 2003[38] and then repealed it in 2012.[39] And in June 2020, Florida eliminated its braiding license as part of a broader effort to reduce licensing requirements imposed on many occupations. Now, in Florida, anyone can provide braiding services, free from unnecessary government interference.[40]

Third, cosmetology laws sometimes treat the same services differently depending on where they are performed. For example, when Minnesota started regulating special event hair and makeup artists, it did not change its exemption for "services for theatrical, television, film, fashion, photography, or media productions or media appearances."[41] Nor did it attempt to regulate retail makeup.[42] Put differently, hair and makeup artists needed a license to work on brides or prom attendees but not to work on news anchors, retail customers or models in bridal magazines. Such exemptions from makeup artistry licensing are common.[43]

In short, not only do cosmetology licensing requirements vary greatly across states, but so do the types of activities that require a license. In some states, an aspiring makeup artist, natural hair braider, hair stylist or shampooer might be required to attend thousands of hours of cosmetology school—hours that may not teach the services in which they want to specialize[44]—while in other states, these activities are fully exempt from licensing. That some states are beginning to recognize that, at a minimum, services like these do not require a license further calls into question the steep burdens imposed by cosmetology licensing schemes.

But despite modest reductions in cosmetology licensing hours, and greater exemptions for people providing niche services, licensing burdens remain high. And while previous research has estimated average hours, very few studies have quantified how much time and money it actually costs to complete required education or whether that investment pays off in the form of earnings.[45] This study takes advantage of a large, and largely untapped, data source to do just that.

Data and Analysis

The primary data sources for this study are the National Center for Education Statistics' 2016 National Household Education Surveys Program's Adult Training and Education Survey[46] and the NCES' Integrated Postsecondary Education Data System.[47] ATES provided data on people working as cosmetologists, while IPEDS provided data on cosmetology schools and their students. (See Appendix B for more details on the data sources, samples and variables.)

ATES Data

ATES gathered data on adults' training and education in the United States as of 2016, with a focus on nondegree credentials and work experience programs. The ATES data contain information on cosmetologists (n=226) that allow us to draw general conclusions about the education and employment of people working in the cosmetology occupation.

IPEDS Data

IPEDS collects data from Title IV schools—that is, schools that accept federal loans and Pell Grants.[48] Such schools must provide the federal government with information about costs and programs, among other things. The IPEDS data used in this study cover the years 2011–2012 through 2016–2017 and contain information on Title IV schools with cosmetology programs.

The number of schools in the dataset varied by year[49] and the research question. Data about program costs, credit hours and months to complete education (n=1,025–1,205 schools) are reported at the program level for a school's largest program, while data about graduation rates and financial aid (n=202–347 schools) are reported at the school level.[50] For research questions using data reported at the program level, we limited our dataset to schools where cosmetology was the largest program or the only program. For questions using data reported at the school level, our dataset includes schools whose *only* program was cosmetology.

Limiting the datasets in these ways ensures we are always looking only at data specific to cosmetology programs and students.[51] However, it also means our data represent only a subset—and, in some cases, a subset of a subset—of schools with cosmetology programs.[52] Nevertheless, the larger of the two IPEDS datasets—comprising program-level data—includes the majority of schools that have cosmetology programs in IPEDS (between 65% and 70%, depending on the year) and are likely representative of the schools attended by most cosmetology students.[53]

Analyzing these data allowed us to answer questions about how long it takes and how much it costs to complete cosmetology school, how much school debt aspiring cosmetologists take on, and how much cosmetologists earn and work. It also allowed us to draw inferences about what drives cosmetology curriculum requirements. While we focus on national findings, we also provide findings by state, averaged across the years of our study, in Table 1. Appendix A provides annual figures.

Table 1: Key Results by State, 6-Year Averages, 2011–2012 to 2016–2017

	BLS	IPEDS Program Sample		IPEDS School Sample							
	Median Annual Wage (2019)	Program Cost	No. of Programs	Percent of Students with Pell Grants	Average Pell Grant Award	Percent of Students with Federal Student Loans	Average Federal Student Loan	Percent of Students Who Graduated On Time	Percent of Students Who Graduated Within 18 Months	Percent of Students Who Graduated Within 24 Months	No. of Schools
Alabama	$20,900	$14,437	8.3	65.3%	$4,070	68.1%	$8,578	18.7%	65.5%	68.4%	2.5
Alaska	$25,420	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arizona	$26,340	$17,019	28.7	70.7%	$4,164	71.5%	$8,590	15.6%	55.3%	57.1%	6.2
Arkansas	$20,430	$14,149	19.2	71.5%	$4,352	53.0%	$7,809	37.7%	65.3%	66.0%	4.5
California	$27,770	$17,144	100.3	60.3%	$4,073	58.0%	$7,337	18.7%	67.7%	69.0%	15.8
Colorado	$29,800	$17,479	22.2	66.0%	$4,118	67.7%	$8,166	14.4%	49.8%	50.9%	6.8
Connecticut	$30,610	$19,357	9.5	56.7%	$3,934	64.5%	$6,709	23.7%	76.5%	78.7%	4.7
Delaware	$31,510	$16,447	3.0	47.3%	$3,732	45.7%	$8,758	1.7%	74.3%	74.3%	3.8
District of Columbia	$31,960	$15,583	1.0	NA	NA	NA	NA	NA	NA	NA	NA
Florida	$24,640	$14,016	66.2	63.7%	$3,893	67.1%	$7,256	18.5%	63.5%	64.5%	11.2
Georgia	$22,970	$17,569	20.7	72.7%	$4,201	69.4%	$7,852	25.0%	63.7%	65.3%	8.2
Hawaii	$30,970	$21,829	1.0	NA	NA	NA	NA	NA	NA	NA	NA
Idaho	$26,040	$16,243	17.0	61.0%	$4,320	58.7%	$7,033	51.6%	78.0%	80.4%	5.7
Illinois	$27,040	$17,658	62.5	69.7%	$3,978	75.3%	$7,705	29.4%	51.4%	53.3%	9.5
Indiana	$22,280	$15,723	32.5	69.2%	$4,117	67.8%	$7,491	24.7%	52.4%	56.5%	7.7
Iowa	$25,990	$19,508	19.0	63.8%	$4,353	72.1%	$6,359	42.3%	66.5%	67.3%	4.0
Kansas	$20,700	$16,860	13.8	60.1%	$4,096	65.5%	$8,363	21.1%	66.7%	68.6%	5.3
Kentucky	$23,460	$15,662	24.8	70.2%	$4,749	17.5%	$6,124	61.1%	71.2%	75.5%	2.7
Louisiana	$19,680	$14,308	27.3	63.4%	$4,128	46.3%	$8,787	24.8%	68.5%	71.3%	5.7
Maine	$25,490	$15,279	4.0	64.0%	$3,946	65.0%	$6,814	16.0%	51.0%	51.0%	1.0
Maryland	$28,110	$18,226	20.5	71.9%	$3,735	73.1%	$6,398	35.0%	61.5%	62.0%	11.8
Massachusetts	$37,670	$13,378	18.5	62.6%	$3,931	67.8%	$6,423	19.6%	71.0%	72.9%	11.2
Michigan	$25,510	$14,793	38.7	73.3%	$4,447	62.1%	$8,322	19.9%	50.4%	57.3%	6.5
Minnesota	$29,600	$17,398	18.7	63.6%	$4,008	66.8%	$7,693	23.8%	55.4%	56.9%	10.2
Mississippi	$24,110	$12,371	13.2	75.4%	$3,944	41.9%	$4,972	49.7%	78.3%	81.7%	1.7
Missouri	$23,760	$14,629	30.8	67.6%	$4,065	69.6%	$7,793	28.0%	61.3%	63.3%	5.5
Montana	$23,570	$12,933	7.0	59.5%	$4,483	54.2%	$5,840	65.1%	76.3%	78.0%	4.8

	BLS	IPEDS Program Sample		IPEDS School Sample							
	Median Annual Wage (2019)	Program Cost	No. of Programs	Percent of Students with Pell Grants	Average Pell Grant Award	Percent of Students with Federal Student Loans	Average Federal Student Loan	Percent of Students Who Graduated On Time	Percent of Students Who Graduated Within 18 Months	Percent of Students Who Graduated Within 24 Months	No. of Schools
Nebraska	$24,220	$19,058	7.0	61.2%	$4,786	63.2%	$9,443	56.8%	60.3%	60.3%	1.5
Nevada	$19,480	$20,443	10.8	54.9%	$4,043	62.6%	$8,363	12.0%	75.3%	76.1%	5.8
New Hampshire	$23,670	$19,413	8.5	43.9%	$4,230	64.3%	$7,166	20.2%	71.8%	72.1%	2.0
New Jersey	$33,510	$16,531	24.3	64.8%	$4,353	72.6%	$6,082	31.9%	71.2%	71.7%	2.7
New Mexico	$21,070	$16,630	4.8	53.5%	$4,410	64.5%	$9,300	20.5%	62.0%	62.0%	1.0
New York	$28,220	$13,381	40.3	57.9%	$3,992	55.8%	$6,735	26.9%	72.4%	73.2%	23.3
North Carolina	$22,690	$17,083	26.0	70.4%	$4,087	57.9%	$7,280	33.2%	61.3%	64.8%	10.8
North Dakota	$25,650	$15,639	7.0	47.6%	$4,231	54.1%	$6,955	32.5%	59.3%	61.3%	2.3
Ohio	$22,250	$16,592	43.5	73.8%	$4,207	66.4%	$7,632	26.2%	55.1%	58.2%	13.2
Oklahoma	$23,430	$12,459	24.8	54.2%	$4,254	38.6%	$7,617	17.5%	66.3%	66.3%	1.3
Oregon	$25,940	$19,362	22.0	NA	NA	NA	NA	NA	NA	NA	NA
Pennsylvania	$21,570	$16,802	46.3	66.6%	$4,442	75.8%	$7,331	17.4%	72.6%	72.6%	2.5
Rhode Island	$28,130	$18,320	4.7	57.6%	$3,713	68.5%	$7,442	3.4%	78.1%	78.1%	2.3
South Carolina	$20,230	$16,994	21.7	68.7%	$4,127	54.1%	$6,732	27.3%	62.7%	63.7%	5.8
South Dakota	$29,650	$14,537	3.0	47.0%	$4,111	54.5%	$6,387	17.5%	66.8%	71.0%	2.8
Tennessee	$24,430	$15,742	34.3	70.6%	$4,002	64.8%	$7,569	20.4%	52.9%	56.1%	12.0
Texas	$22,240	$15,274	90.7	71.9%	$4,201	68.0%	$7,817	26.8%	56.2%	58.5%	13.8
Utah	$26,060	$14,393	21.7	52.4%	$4,064	39.0%	$5,410	55.9%	78.0%	80.6%	9.7
Vermont	$26,830	$17,409	1.3	NA	NA	NA	NA	NA	NA	NA	NA
Virginia	$26,510	$17,264	17.8	66.9%	$4,021	67.7%	$7,456	20.0%	57.6%	60.7%	12.0
Washington	$38,380	$16,077	21.7	59.6%	$4,490	64.8%	$7,505	33.9%	73.5%	74.8%	4.3
West Virginia	$20,830	$14,281	6.7	53.0%	$4,100	50.0%	$4,569	7.0%	71.0%	71.0%	1.0
Wisconsin	$26,420	$17,669	23.0	64.0%	$4,227	65.4%	$8,765	33.3%	63.1%	64.4%	9.0
Wyoming	$30,900	$16,775	1.0	NA	NA	NA	NA	NA	NA	NA	NA
Average	**$26,270**	**$16,104**	**22.8**	**65.4%**	**$4,021**	**63.2%**	**$7,456**	**27.2%**	**63.0%**	**65.0%**	**7.0**

Note: NA indicates unavailable data. Information was not available at the school level for several states. This often occurred where schools had multiple programs, as it was often unclear which data could be associated with a school's cosmetology program. Information was not available at either the program or school level for Alaska, as IPEDS does not contain data on Alaska cosmetology schools for any of the school years in our study period.

Cristina Ziemer is a Twin Cities-area hair and makeup artist.

Photo by Chelsea Photography LLC

Cosmetology School Makes a Bad Match for Aspiring Makeup Artists

Debbie Carlson founded the first dedicated makeup school in the Upper Midwest.

Cristina Ziemer is one of the hundreds of entrepreneurs, most of them women, whose small businesses were imperiled when Minnesota began requiring cosmetology school for makeup artists. Cristina, who specializes in bridal and special event hair and makeup, took her Twin Cities-area business underground to avoid fines and criminal penalties.

Yet, and as Cristina knows all too well, cosmetology school does not prepare people to work as makeup artists. Indeed, she is a cosmetology school graduate.

Cristina hoped cosmetology school would prepare her for an exciting career in makeup. But while she learned all about hair, nails and even waxing, Cristina estimates the one-year, $20,000 program spent only about a week on makeup. Her disappointment was compounded when an instructor recommended she take a separate $400 makeup artist certification course, saying it would teach her much more about makeup than her cosmetology program.

Nevertheless, Cristina finished the program. She also took—and passed—Minnesota's three cosmetology licensing exams. But she could not afford the state's $100 licensing fee. To save for it, she got a job selling, and applying, makeup at a department store beauty counter. In the meantime, she began freelancing as a makeup artist, eventually building a successful small business.[a]

Since she didn't need a license to do what she was doing, Cristina never ended up paying the fee. When she tried to pay it later, she was told too much time had elapsed. She would need to repeat cosmetology school and once again learn all about cutting and coloring hair and doing other things special event hair and makeup artists do not do.[b]

Debbie Carlson, during her 40 years in the beauty industry, has met many women like Cristina who have been ill served by cosmetology school. She knows better than most that makeup is an afterthought in cosmetology curricula. Herself a licensed cosmetologist, Debbie worked for years as an instructor and later education director for a large chain of cosmetology schools. As she describes it, cosmetology school just teaches students how to touch up clients' makeup.

Debbie has also seen firsthand how cosmetology schools, hungry for financial aid money, reel in aspiring makeup artists. "They tell them, 'Everything you want is on the other side of this contract,'" she says. Such students would often ask Debbie how they could build a career in makeup like hers. It gave her no pleasure to tell them they would not learn the necessary skills in cosmetology school.

This experience inspired Debbie to open Faces Etc, the first dedicated makeup school in the Upper Midwest and the only licensed makeup school in Minneapolis. When the state started requiring cosmetology school for makeup artists, Face Etc's enrollment plummeted since graduates could no longer legally work unless they also had a cosmetology license.[c]

Unwilling to let the state destroy their livelihoods, Cristina and Debbie decided to fight back. In October 2019, they sued the state cosmetology board.[d] They also joined with the Institute for Justice to push for a bill to explicitly exempt special event hair and makeup artists from cosmetology licensure.[e]

If hair stylists and makeup artists can safely do their jobs with just four hours of education, it is worth asking whether cosmetologists truly need so much more time in school to do theirs.

Despite opposition from the cosmetology lobby,[f] the bill became law in May 2020.[g] The new law restores special event hair and makeup artists' right to work freely as they always had, with one change: Now, they must complete a four-hour course on health, safety and infection control. And the new law goes even further. It also frees shampooers and hair stylists to work in blow dry bars after taking the same short course.[h] Just one day after the law went into effect, Debbie offered the first such class to eager students who had signed up in advance.[i]

This is important progress, and it will help Minnesota's special event hair and makeup artists get back to work once the pandemic ends. But cosmetology licensing in Minnesota and other states remains burdensome, requiring aspiring cosmetologists and, in some cases, other beauty industry workers to spend over a year of education and experience on average.[j]

If hair stylists and makeup artists can safely do their jobs with just four hours of education, it is worth asking whether cosmetologists truly need so much more time in school to do theirs.

a Civil Rights Complaint for Declaratory and Injunctive Relief, *Ziemer v. Minn. Bd. of Cosmetologist Exam'rs*, Case No. 62-CV-19-7607 (Minn. Dist. Ct. Oct. 22, 2019).
b *Id.*
c *Id.*
d *Id.*
e *Hairstyling and Makeup Application Exempted from Licensing*: Hearing on H.F. 3202 Before the H. Gov't Operations Comm., 91st Leg., Reg. Sess. (Minn. Feb. 27, 2020), https://www.youtube.com/watch?v=Lz1HS8hGzNo; Sibilla, N. (2020a, May 19). Minnesota bill would untangle red tape for freelance hair and makeup artists [Press release]. Arlington, VA: Institute for Justice. https://ij.org/press-release/minnesota-bill-would-untangle-red-tape-for-freelance-hair-and-makeup-artists/
f McClallen, S. (2020, Mar. 2). Committee okays bill seeking to exempt Minnesota hairstylists and makeup artists from licensing laws. *The Minnesota Sun*. https://theminnesotasun.com/2020/03/02/committee-okays-bill-seeking-to-exempt-hairstylists-and-makeup-artists-from-licensing-laws/. See also Hearing on H.F. 3202, *supra* note e, at 23:30 (statement of Jim Hirst, Minnesota Salon & Spa Professional Association).
g Minn. H.J., 91st Leg., Reg. Sess. 8955 (May 27, 2020); Sibilla, N. (2020b, May 27). Minnesota ends licenses for freelance makeup artists and hairstylists, preserves over 1,000 jobs [Press release]. Arlington, VA: Institute for Justice. https://ij.org/press-release/minnesota-ends-licenses-for-freelance-makeup-artists-and-hairstylists-preserves-over-1000-jobs/
h SF 2898, 91st Leg., Reg. Sess. (Minn. 2020); https://www.revisor.mn.gov/bills/bill.php?b=Senate&f=SF2898&ssn=0&y=2019
i Debbie Carlson (personal communication, Apr. 27, 2021); Faces Etc. of MN – Professional Makeup School. (2020, June 26). Are you signed up? 4 hour sanitation class [Facebook update]. https://www.facebook.com/facesetcofmn/photos/a.224234632844/10158862714442845
j Carpenter, D. M., Knepper, L., Sweetland, K., & McDonald, J. (2017). *License to work: A national study of burdens from occupational licensing* (2nd ed.) Arlington, VA: Institute for Justice.

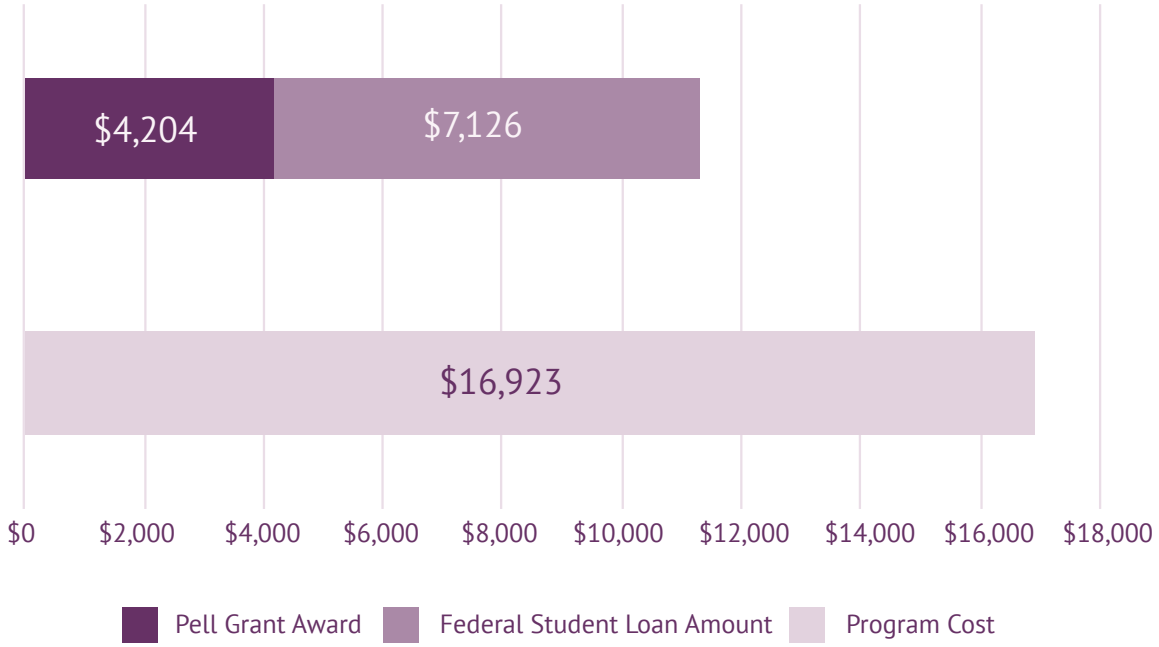
Results

Key Finding 1: The education required for cosmetology licensure is expensive and time-consuming, and students typically incur significant student loan debt to finance it.

Cosmetology programs are expensive in terms of both time and money. The median program length in our sample is 1,500 hours, and most schools reported that their programs took about 12 months to complete[54]—though, as discussed below, this does not reflect student experience as many students did not, in fact, graduate within 12 months. This finding is in line with IJ's previous estimate that state cosmetology licenses require nearly 13 months of education and experience on average.[55]

Figure 1: Financing Cosmetology School

1A: Average Costs vs. Average Pell Grant Awards and Federal Student Loan Amounts for Awardees, 2016–2017

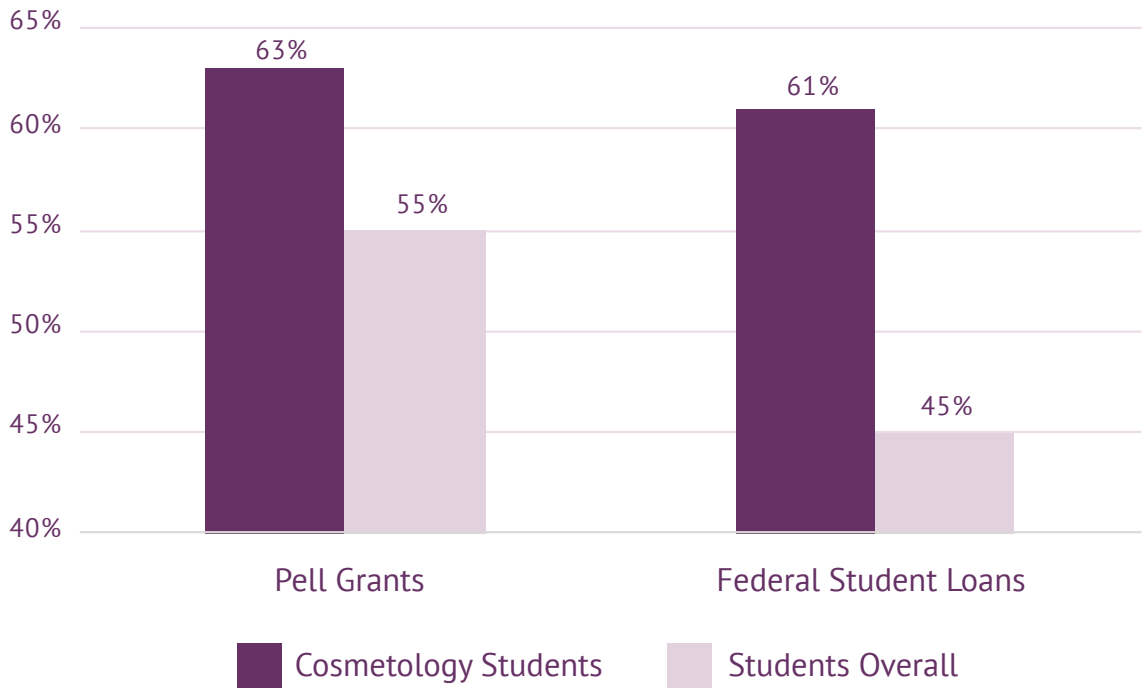


For this education, students can expect to pay thousands of dollars. Across the six years of our study period, cosmetology program costs averaged $16,104 for students finishing within about 12 months. (See Table 1 on pp. 12–13.) Program costs rose slightly during that time, reaching nearly $17,000 by the 2016–2017 school year. (See Figure 1 and, for costs by year, Appendix A, Table A1.) These costs include tuition and school fees as well as books and supplies, but not room and board or other expenses that students may incur during their time in school.

Compared to a four-year degree, cosmetology school may appear to be a bargain, but most cosmetology students come from lower-income backgrounds and most must finance their education with the help of financial aid. The income profile of students is illustrated by federal Pell Grant data. Pell Grants are a form of need-based aid intended to help lower-income students access postsecondary education and vocational programs.[56] Most cosmetology students rely on Pell Grants, and they are more likely to receive them than the average student across all schools. During the 2016–2017 school year, around 63% of cosmetology students received Pell Grants compared to about 55% of students overall.

Cosmetology students are also more likely to take out student loans and to take out larger loans than the average student. During the 2016–2017 school year, for instance, about 61% of cosmetology students took out federal student loans versus 45% of students overall. And cosmetology students borrowed over $7,100 on average, while student loans overall averaged about $6,500. Though Pell Grants generally do not need to be repaid,[57] student loans do and can represent a substantial burden for students of lesser means.

1B: Percent of Cosmetology Students with Pell Grants and Federal Student Loans vs. Students Overall, 2016–2017



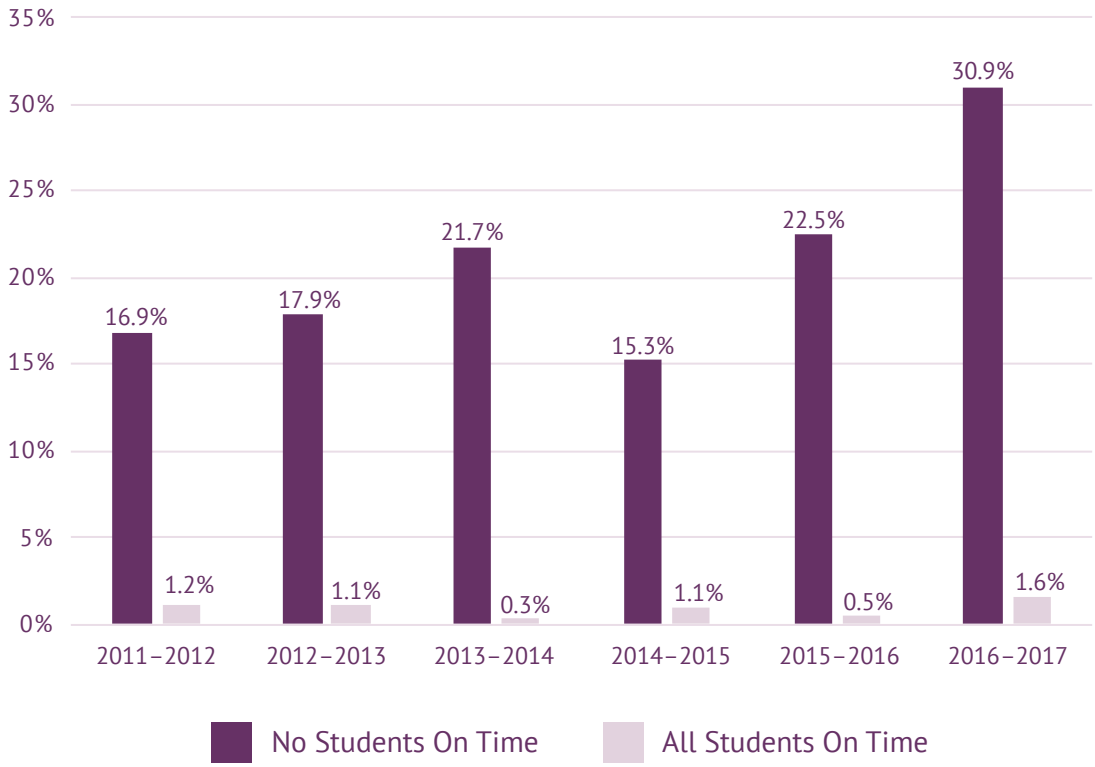
Sources: Costs are derived from the IPEDS Program Sample. Pell Grant and federal student loan amounts and percentages are derived from the IPEDS School Sample. See Appendix B for details.

Key Finding 2: Cosmetology programs rarely graduate students on time, delaying aspiring cosmetologists' entry into the workforce and increasing their debt burden.

The actual cost of completing cosmetology school is often much higher than the total program costs reported for any given year, even leaving aside room and board and other costs not accounted for in IPEDS data. This is because schools in our sample (whose only program was cosmetology) often failed to graduate students on time, or within the 12 months they reported their programs took to complete.

Indeed, during our study period, many schools graduated no students on time. (See Figure 2.) In the year with the highest on-time graduation rates, around 15% of cosmetology schools in our dataset failed to graduate any students on time; in the worst year covered by our data—that is, the year with the highest rate of schools that graduated no students on time (2016–2017)—that figure was nearly 31%. Across our study period, only around 1% of schools in our sample graduated all students on time.

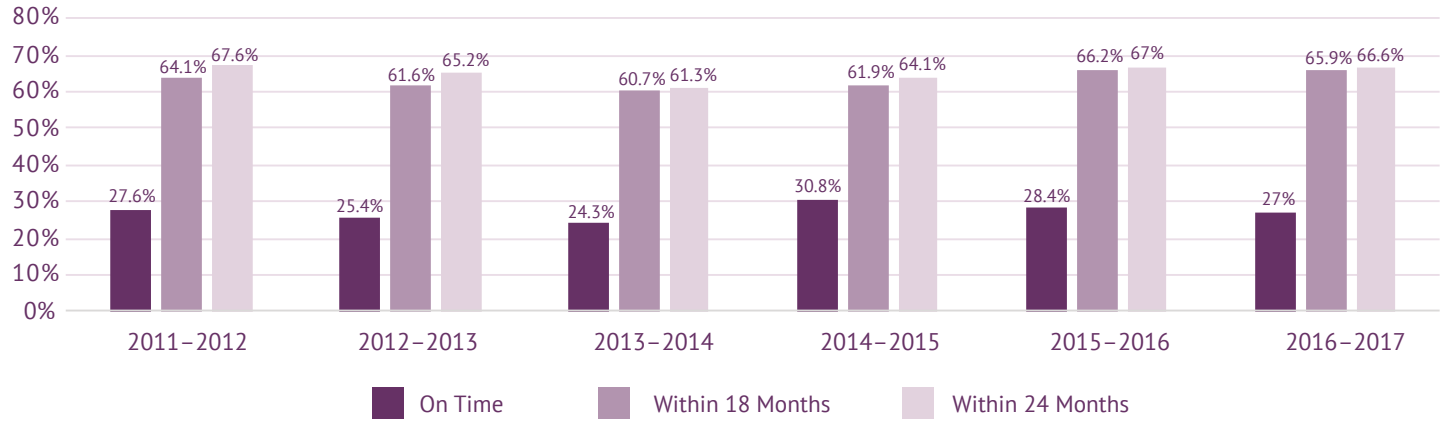
Figure 2: Percent of Cosmetology Schools that Graduated No Students On Time vs. All Students On Time, 2011–2012 to 2016–2017



Source: IPEDS School Sample. See Appendix B.

In general, only a minority of students at schools in our sample—between 24% and 31%—finished their schooling on time, or within one year. Given six extra months, or 18 months total in cosmetology school, only 60% to 66% of students finished. And data indicate students who did not finish within 18 months were unlikely to finish within 24 months either.[58] (See Figure 3.)

Figure 3: Average Percent of Students Per School Who Gradated On Time, Within 18 Months and Within 24 Months, 2011–2012 to 2016–2017



Source: IPEDS School Sample. See Appendix B.

Students who do not graduate on time may be forced to pay additional money. Some cosmetology schools require students to complete their programs within a certain amount of time and increase their tuition if they fail to do so.[59] All of this means some students may end up with debt substantially greater than the average student loan reported for any one school year.

Several factors likely contribute to cosmetology schools' poor on-time graduation rates. Some may have to do with their students' personal circumstances; for example, lower-income students may find it especially hard to spend so much time in school instead of working. However, given cosmetology schools' exceedingly low on-time graduation rates, school policies and practices may play an important role.

For example, La' James International College, a chain of cosmetology schools in Iowa, has been accused of a number of practices that made it difficult for students to graduate on time, including "provid[ing] an understaffed, chaotic educational environment." The chain also allegedly "fail[ed] to provide adequate numbers of walk-in salon clients" for students to practice on and, unlike most other cosmetology schools, would not allow students to practice on mannequins or other students when clients were lacking, which was often.[60] According to a lawsuit filed by the Iowa attorney general, these and other practices caused "many students to become frustrated and stop attending classes on a regular basis."[61] See "Beauty Schools Use Ugly Practices to Boost Profits" on page 28 for more on La' James' alleged practices.

State mandates—specifically the often large number of education hours required for licensure—may also play a role. Most states require aspiring cosmetologists to complete a mix of theoretical and practical education—that is, of classroom instruction and hands-on training, typically in a school's salon. Iowa, for example, requires 765 hours of classroom instruction (150 hours of core life sciences and 615 hours of cosmetology theory) and 1,335 hours of applied practical instruction, for a total of 2,100 hours.[62] That is over 10 months just of practical instruction—more than some states require for classroom instruction and practical instruction combined.[63] Where a school's salon has plenty of clients, that time might be usefully spent. But anecdotal evidence suggests that students spend much of this time standing around—and that some get tired of the waiting and leave.

As one former cosmetology student from Iowa told *The New York Times*, "I would say probably 60 percent of our time was sitting around waiting for people. There were times where I personally had met all my goals that I needed to meet. I was literally just waiting. I had to finish my clock hours."[64] Another reported business at her school's salon was slow except on Fridays and Saturdays. Despite the boredom, she would stick around, knowing she would get credit even if she failed to work on a single customer. Other students, though, would go home. "That only works against you," she said. "You have to stay here and do absolutely nothing or you can go home and lose the hours."[65]

Though it may be in a student's best interest financially to stay and get credit for standing around, the temptation to leave when there are no customers is understandable. And it is unclear what public interest is served by requiring students to "do absolutely nothing," especially in a state like Iowa, where education requirements are already so much steeper than those of most other states.

Key Finding 3: If aspiring cosmetologists graduate and become licensed, they frequently end up in jobs where they earn low wages and work long hours with very little time off, likely making it difficult to repay loans.

Aspiring cosmetologists presumably assume these burdens because they believe going to cosmetology school will prepare them for well-paying work. Unfortunately, the reality is often less rosy. The cosmetologists in our sample reported earning an annual median personal income of between $20,001 and $30,000 in 2016. This is in line with the Bureau of Labor Statistics' most recent estimate, which was $26,090 in May 2019.[66]

For comparison, according to BLS estimates, restaurant cooks,[67] janitors[68] and concierges[69] all had higher 2019 median incomes ($27,790, $27,430 and $31,390, respectively). None of those occupations have burdensome state licensure or state-mandated education requirements,[70] meaning people working in those occupations face far fewer barriers to entry than do cosmetologists. (See Figure 4.)

Figure 4: Median Salaries of Cosmetologists, Restaurant Cooks, Janitors and Concierges, 2019

*No burdensome state licensure or education requirements.

Source: Bureau of Labor Statistics.

Department of Education College Scorecard data paint an even bleaker picture, putting median first-year earnings at $16,554 and median student debt at $9,934 for 2014–2015 and 2015–2016 cosmetology graduates. Cosmetology programs generated the fifth largest share of student loan borrowers among all programs—including not only certificate and undergraduate degree programs but also master's and professional degree programs. At the same time, cosmetology graduates' first-year earnings were far lower than those of graduates of any other program in the top 20 for borrowers.[71] Cosmetology education therefore seems to offer a low return on investment and may make it hard for graduates to make ends meet—and repay their student loans.

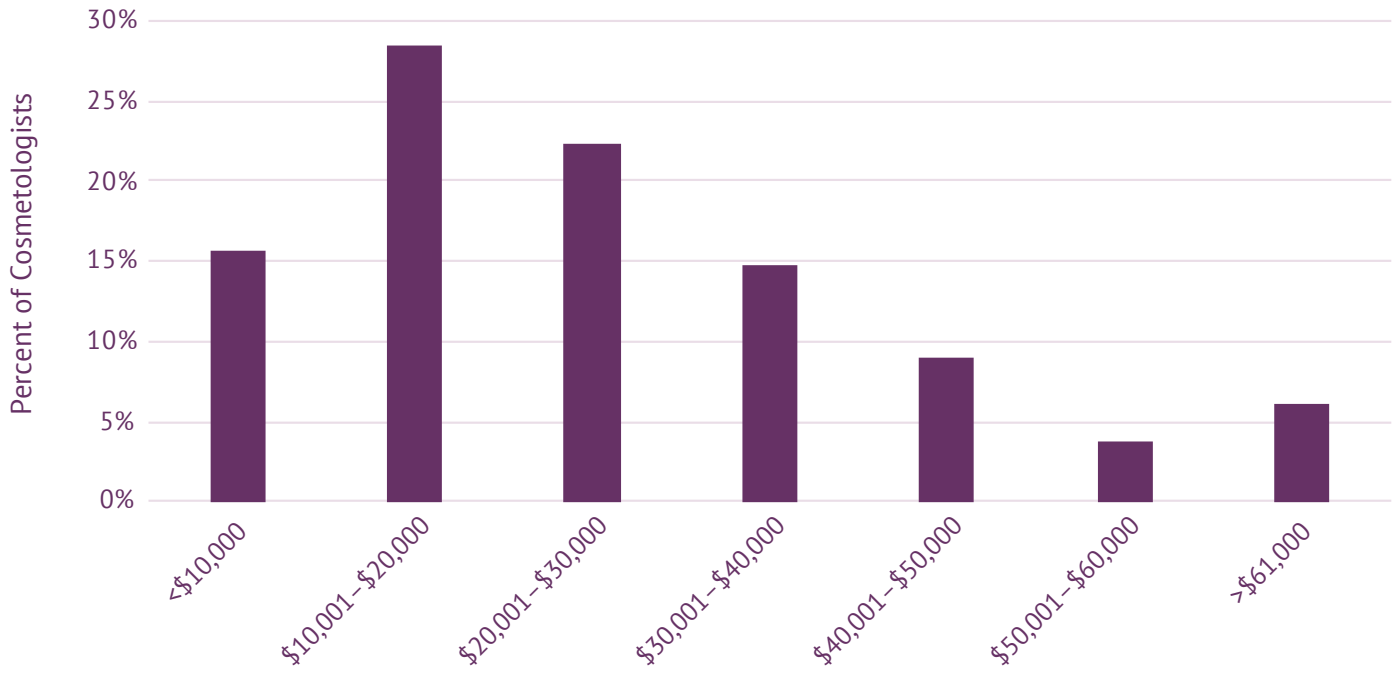
Not only do cosmetologists earn less than many other entry-level workers, but they have not seen the kind of wage growth many other Americans have. While median personal income in the United States has increased steadily in recent years,[72] median income for cosmetologists has not kept pace: Both wages and wage growth are lower and slower for cosmetologists than for the rest of the population.[73] Moreover, many cosmetologists earn far less than the median. Over 28% of cosmetologists—the largest group in our sample—earned only between $10,001 and $20,000. (See Figure 5.)

Cosmetologists earn such low wages despite working full time with little time off. Among those working in 2016, cosmetologists averaged about 35 hours a week, and 62% reported they worked between 50 and 52 weeks a year. Over 17% reported working over 40 hours a week.

Many cosmetologists simply may not be able to afford to take time off. Some are hourly tipped employees, which means that in many states they can be paid a lower minimum wage, similar to restaurant servers. If their wages and tips do not add up to the regular minimum wage, their employers must make up the difference.[74] Many others are independent contractors who rent booths in salons.[75] If these independent contractors do not see clients, they do not get paid—but they must still pay the salon owner. Independent contractors are also responsible for self-employment tax, and they must typically provide their own equipment and supplies. In either case, cosmetologists have an incentive to work as much as possible.

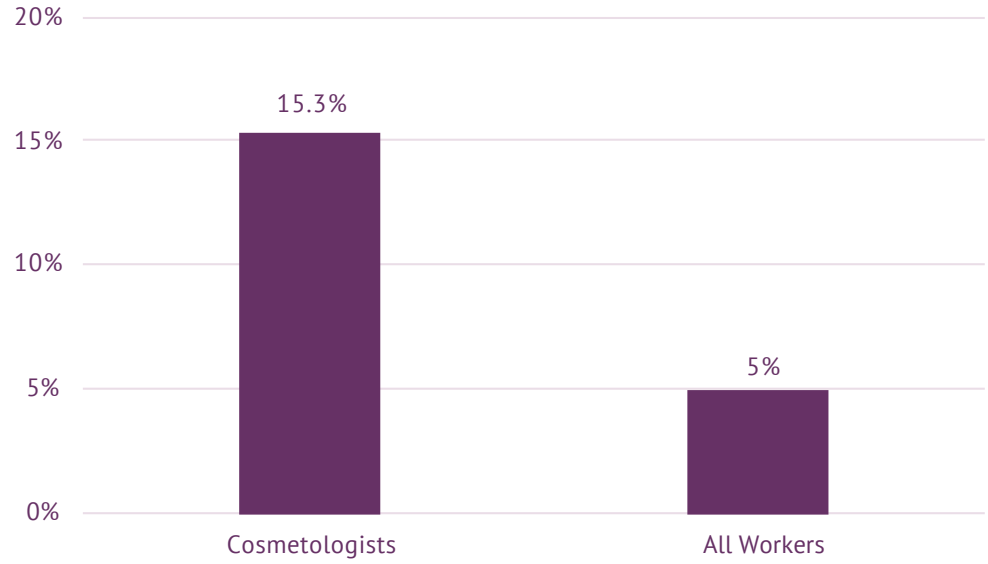
Many cosmetologists also work second jobs, perhaps by choice but likely, given low average wages, often by economic necessity. At slightly more than 15%, the percentage of cosmetologists who worked more than one job in 2016 was three times the percentage of all U.S. workers who did so.[76] (See Figure 6.)

Figure 5: Cosmetologists' Annual Earnings, 2016



Source: ATES. See Appendix B.

Figure 6: Percent of Cosmetologists and Other Workers Working More Than One Job, 2016



Sources: ATES and Bureau of Labor Statistics.

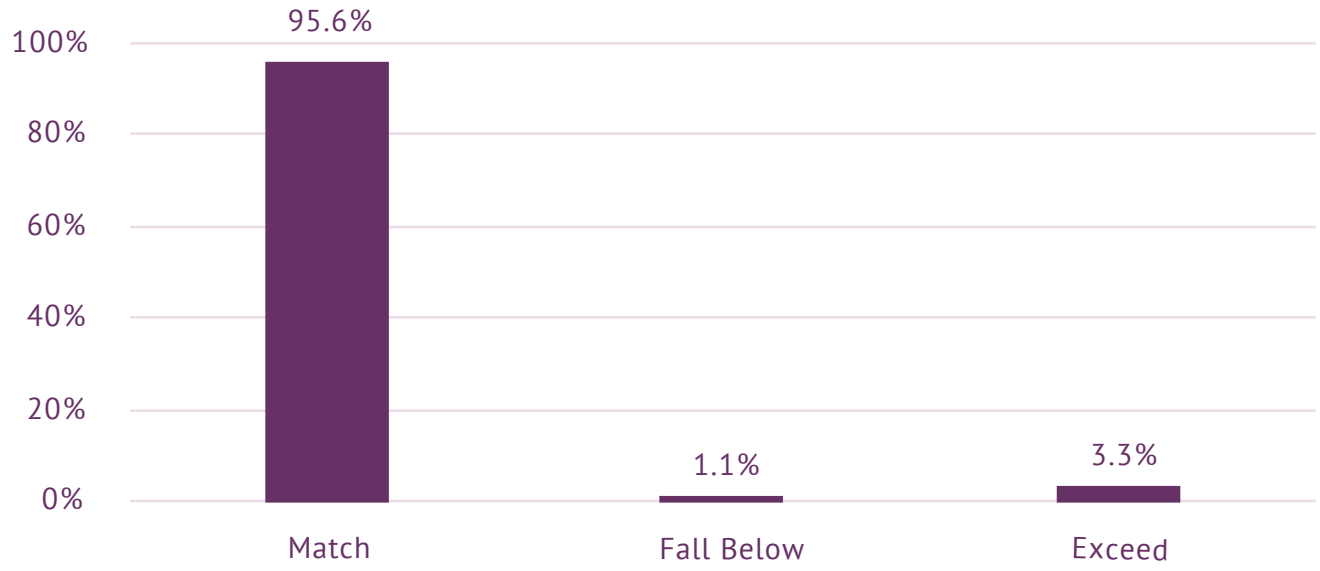
In short, the data indicate very few cosmetologists can command celebrity-stylist wages. Yet given the expense of attending cosmetology school, it seems likely many aspirants enter the field expecting a better return on their investment. And cosmetology schools are keen to encourage these great expectations. Their websites frequently assert that a career in cosmetology comes with unlimited earning potential.[77] "Depending on the location of employment, the number of hours worked, and the building of a clientele, persons in the field of cosmetology and barbering have unlimited potential for personal annual earnings," declares one.[78] Proclaims another, "With a lot of hard work and a little bit of talent, the sky's the limit when it comes to making money in the beauty industry!"[79]

Beyond marketing copy, some students have claimed they were misled into enrolling in cosmetology school with inflated estimates of what they could expect to earn. For example, one cosmetologist complained to the Iowa attorney general that she borrowed $20,000 to attend cosmetology school after the school told her "for certain" she would make between $40,000 and $60,000 as a hairstylist. But in six years working as a stylist, she never earned more than $28,000 a year. "The whole program is a scam and it has ruined my credit and has [a]ffected our lives greatly," she wrote. "It was one of the biggest mistakes I've ever made. I want my money back."[80]

Key Finding 4: State licensing mandates largely explain cosmetology program length.

A close look at the data suggests state licensure requirements largely explain why cosmetology school takes as long (and costs as much) as it does. During the 2016–2017 school year, over 95% of cosmetology programs reported program lengths that exactly matched the hours of education required for state licensure, while only about 3.3% of schools had program hours that exceeded their state's licensure requirements. (See Figure 7 and Table 2.)

Figure 7: Percent of Cosmetology Programs That Match, Fall Below or Exceed State Mandates, 2016–2017



Sources: IPEDS Program Sample and Carpenter, D. M., Knepper, L., Sweetland, K., & McDonald, J. (2017). *License to work: A national study of burdens from occupational licensing* (2nd ed.) Arlington, VA: Institute for Justice. http://ij.org/report/license-work-2/. See Appendix B.

Table 2: Educational Hours Required for Licensure and Median Cosmetology Program Hours by State, 2016–2017

	Educational Hours Required for Licensure	Median Program Credit Hours	Programs Where Credit Hours=Hours Required for Licensure	Programs Where Credit Hours<Hours Required for Licensure	Programs Where Credit Hours>Hours Required for Licensure	Total Programs
Alabama	1,500	1,500	9	0	0	9
Alaska	1,650	NA[81]	NA	NA	NA	NA
Arizona	1,600	1,600	24	0	0	24
Arkansas	1,500	1,500	16	0	0	16
California	1,600	1,600	89	0	0	89
Colorado	1,800	1,800	12	5	0	17
Connecticut	1,500	1,500	10	0	0	10
Delaware	1,500	1,500	3	0	0	3
District of Columbia	1,500	1,500	1	0	0	1
Florida	1,200	1,200	59	1	6	66
Georgia	1,500	1,500	19	0	0	19
Hawaii	1,800	1,800	1	0	0	1
Idaho	2,000	2,000	15	0	0	15
Illinois	1,500	1,500	53	0	2	55
Indiana	1,500	1,500	27	0	0	27
Iowa	2,100	2,100	17	0	0	17
Kansas	1,500	1,500	9	0	0	9
Kentucky	1,800	1,800	19	0	0	19
Louisiana	1,500	1,500	28	0	0	28
Maine	1,500	1,500	3	0	0	3
Maryland	1,500	1,500	19	0	0	19
Massachusetts	1,000	1,000	15	0	0	15
Michigan	1,500	1,500	34	0	2	36
Minnesota	1,550	1,550	12	0	1	13
Mississippi	1,500	1,500	12	0	0	12
Missouri	1,500	1,500	27	0	1	28
Montana	2,000	2,000	6	0	0	6
Nebraska	2,100	2,100	7	0	0	7
Nevada	1,600	1,600	8	0	0	8
New Hampshire	1,500	1,500	8	0	1	9
New Jersey	1,200	1,200	24	0	0	24
New Mexico	1,600	1,600	5	0	0	5
New York	1,000	1,000	39	0	1	40
North Carolina	1,500	1,500	20	1	0	21
North Dakota	1,800	1,800	7	0	0	7

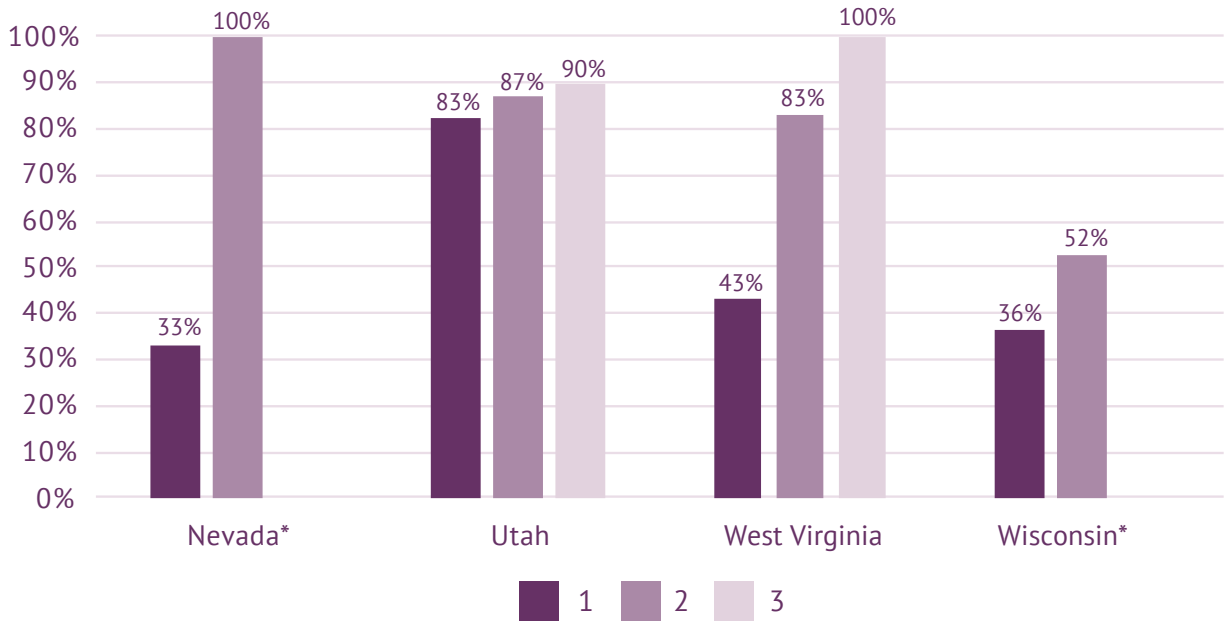
	Educational Hours Required for Licensure	Median Program Credit Hours	Programs Where Credit Hours=Hours Required for Licensure	Programs Where Credit Hours<Hours Required for Licensure	Programs Where Credit Hours>Hours Required for Licensure	Total Programs
Ohio (cosmetology program)	1,500	1,500	15	0	0	15
Ohio (advanced cosmetology program[82])	1,800	1,800	19	0	0	19
Oklahoma	1,500	1,500	21	2	0	23
Oregon	2,300[83]	2,300	21	1	0	22
Pennsylvania	1,250	1,250	43	0	0	43
Rhode Island	1,500	1,500	4	0	0	4
South Carolina	1,500	1,500	20	0	0	20
South Dakota	2,100	2,100	3	0	0	3
Tennessee	1,500	1,500	28	0	0	28
Texas	1,500	1,500	84	0	0	84
Utah	1,600	1,600	19	0	2	21
Vermont	1,500	1,500	1	0	0	1
Virginia	1,500	1,500	13	0	2	15
Washington	1,600	1,600	14	0	6	20
West Virginia	1,800	1,800	6	1	0	7
Wisconsin	1,550	1,550	11	0	10[84]	21
Wyoming	2,000	2,000	1	0	0	1
Total Programs			979	11	34	1,025
% of Total Programs			95.6%	1.1%	3.3%	

Sources: IPEDS Program Sample and Carpenter, D. M., Knepper, L., Sweetland, K., & McDonald, J. (2017). *License to work: A national study of burdens from occupational licensing* (2nd ed.) Arlington, VA: Institute for Justice. http://ij.org/report/license-work-2/. See Appendix B.

And even in those few exceptions, program length appears to be driven by state mandates. In some cases, schools are serving students seeking licensure in a nearby state with more mandated hours. For instance, the one school in Minnesota whose curriculum hours exceeded the state required 1,550[85] licensure hours has a 2,100-hour program. Per the school's website, that program is geared toward meeting minimum licensing standards in neighboring Iowa and South Dakota, both of which require 2,100 hours.[86] In other cases, schools appear to be adapting to regulatory changes. Wisconsin, for example, decreased required education hours during the study period. Some schools may have had longer curriculum requirements for the last year in our dataset because they were still adjusting.

Indeed, data from three of the four states that have reduced cosmetology licensing requirements in recent years show that after required education hours for licensing were reduced, corresponding reductions in the length of cosmetology programs quickly followed. (See Figure 8.)

Figure 8: Percent of Cosmetology Programs That Reduced Hours Within One, Two and Three Years of Reduced State Mandates



*Year 3 is outside our study period for Nevada and Wisconsin.
Source: IPEDS Program Sample. See Appendix B.

After Nevada lowered the hours required for licensure in May 2015, one-third of the schools in our sample lowered their curriculum hours to match for the 2015–2016 school year. The remaining schools lowered hours for the next school year. After Utah lowered its educational requirements for licensure in March 2013, more than 80% of schools decreased their hours to match for the 2013–2014 school year. By the following school year, almost 90% of schools had lowered their hours, and that percentage continued to increase. And when West Virginia decreased its required educational hours effective June 1, 2013, over 40% of schools decreased their program hours to match by the end of the 2012–2013 school year. More than 80% of schools decreased their program hours for the 2013–2014 school year, and the remainder decreased their program hours the following year.

The fourth state that reduced educational hours required for cosmetology licensure during the study period, Wisconsin, did not see an immediate decrease in cosmetology curriculum hours. However, this was likely due to a regulatory roadblock. In 2013, the Wisconsin Legislature modestly decreased the cosmetology licensing hours from 1,800 to 1,550.[87] However, the state Cosmetology Examining Board's regulations for schools continued to require 1,800 curriculum hours. The board moved to change the regulations, but those changes did not become final until August 2015.[88] Once the board changed its regulations, about 36.4% of schools decreased their curriculum hours to 1,550 for the 2015–2016 school year. By the following year, the last covered by the data, over 50% of schools had decreased their hours to 1,550. More schools have likely fallen in line in the intervening years.

The experience in these four states suggests that schools will rapidly reduce their curriculum hours in response to reduced licensure requirements (at least when not prevented from doing so by other state rules). From students' perspective, this makes sense. Aspiring cosmetologists need to meet state licensure requirements to work legally. Training beyond that is a waste of time and money—unless employers seek job candidates with more advanced credentials. The near-universal match between state mandates and cosmetology program hours suggests employers are not demanding additional training. Furthermore, given how rapidly programs were able to reduce curriculum hours, there may be nothing inherent to cosmetology that requires a certain number of hours. Cosmetology did not suddenly become less dangerous or less sophisticated, yet programs were able to shed hundreds of hours in requirements almost overnight. Instead, it appears that government mandates drive cosmetology school program hours.

Beauty Schools Use Ugly Practices to Boost Profits

Cosmetology schools have been called the "biggest scam in higher education" because of the way they make money.[a] Cosmetology students essentially pay for the privilege of working for their schools. Here is how it works: Students pay the schools tuition—as this study shows, often going deep into debt to do so—and customers pay the schools for services they receive from students working *for free* in the schools' salons. And this double-dipping is only the most obvious way that cosmetology schools arguably take advantage of students.

Cosmetology schools around the country stand accused of using shady practices to make even more money off their students. Take La' James International College, a chain of cosmetology schools in Iowa, for example. In 2014, the state attorney general filed a consumer fraud lawsuit against the chain, alleging it engaged in deceptive, omissive and unfair practices.[b]

Cosmetology schools around the country stand accused of using shady practices to make even more money off their students.

Among other things, the state's lawsuit alleged La' James "failed to disclose important information to prospective students," such as the fact that they would get credit only for practicing skills on paying customers of the schools' salons, not mannequin heads or even fellow students when customers were lacking; that students themselves would have to recruit those customers and pay for the services themselves if customers could not or would not pay; and that they would have to sell products and be penalized for not doing so.[c]

The upshot of these practices, the lawsuit alleged, was that many students became frustrated and stopped attending school regularly. This, together with alleged understaffing and other problems at the chain's schools, meant students had difficulty completing school by the agreed-upon—yet entirely arbitrary—completion deadline. And for every hour they attended past the deadline, the chain required students to pay additional tuition. The chain refused to waive these "overage fees" even for students with reasonable excuses, such as illness, pregnancy and other circumstances beyond their control. La' James also allegedly imposed higher overage fees than advertised to students and kept poor records that resulted in students being overcharged.[d]

Arbitrary completion deadlines paired with overage fees are common with cosmetology schools. The specific policies and amounts vary widely, but overage fees can add thousands of dollars to the cost of cosmetology education. Indeed, in less than three and a half years, La' James levied over $631,000 in overage fees on the 254 graduates who did not graduate on time—over 25% of the chain's students during the period—a per-student average of nearly $2,500.[e]

Without admitting any wrongdoing, La' James entered a consent judgment with Iowa in 2016. Among other things, the judgment required the chain to provide students with a one-page disclosure form clearly laying out all costs and other key information and to stop forcing students to recruit customers or pay the school for services provided to nonpaying customers. The judgment also required that La' James forgive $2.16 million in debt from former students and pay to clear the students' credit reports of those debts.[f]

The consent decree is good news for current and former students of La' James and should serve as a warning to other cosmetology schools that might engage in such practices.

However, the judgment did nothing to address the fact that students in Iowa—and across the country—still essentially pay their schools for the privilege of working for free. Nor did it address the steep licensing requirements that force students to spend far longer in cosmetology school than can be justified by the demands of public health and safety. Indeed, even if La' James' alleged practices were an extreme example, the basic structure they exploited are core to cosmetology licensing laws nationwide.

a Editorial board. (2019, Jan. 11). Beauty schools may be biggest scam in higher education [Editorial]. *Des Moines Register*. https://www.desmoinesregister.com/story/opinion/editorials/2019/01/11/beauty-schools-may-biggest-scam-higher-education-lajames-cosmetology/2450697002/; see also Kolodner, M., & Butrymowicz, S. (2018, Dec. 26). A $21,000 cosmetology school debt, and a $9-an-hour job. *The New York Times*. https://www.nytimes.com/2018/12/26/business/cosmetology-school-debt-iowa.html and Editorial board. (2013a, Mar. 31). Irrational licensing law: 2,100 hours to cut hair; 150 hours for EMTs [Editorial]. *Des Moines Register*. https://www.pulitzer.org/files/2014/editorial-writing/dominick/01dominick2014.pdf

b Petition, *State v. La' James College of Hairstyling, Inc*., Equity No. EQCE077018 (Iowa Dist. Ct. Aug. 28, 2015), https://www.iowaattorneygeneral.gov/media/cms/La_James_petition_359CF3F6B381F.pdf; see also Iowa Department of Justice Office of the Attorney General. (2014, Aug. 28). *Attorney general files consumer fraud lawsuit against La' James International College* [News release]. Des Moines, IA. https://www.iowaattorneygeneral.gov/newsroom/attorney-general-files-consumer-fraud-lawsuit-against-la-james-international-college and Leys, T. (2014, Aug. 28). State: La' James cosmetology schools defraud students. *Des Moines Register*. https://www.desmoinesregister.com/story/news/crime-and-courts/2014/08/28/la-james-cosmetology-schools-defraud-students-iowa-authorities-say-in-lawsuit/14740907/. For more background on the allegations against La' James, see Editorial board. (2013b, May 5). Claims about La'James need to be investigated [Editorial]. *Des Moines Register*. https://www.pulitzer.org/files/2014/editorial-writing/dominick/03dominick2014.pdf. In recent decades, large cosmetology chains in California and New York have shuttered in the wake of allegations of fraud. Masunaga, S., & Kirkham, C. (2016, Feb. 5). Marinello Schools of Beauty abruptly shuts down after federal allegations. *Los Angeles Times*. https://www.latimes.com/business/la-fi-marinello-closing-20160205-story.html and Rueb, E. S. (2013, July 28). Beauty school students left with broken promises and large debts. *The New York Times*. https://www.nytimes.com/2013/07/29/nyregion/promised-better-life-by-beauty-schools-graduates-have-little-training-and-lasting-debt.html

c Petition, *supra* note b.

d *Id.*

e *Id.*

f Consent Judgment, *State v. La' James College of Hairstyling, Inc*., Equity No. EQCE077018 (Iowa Dist. Ct. June 29, 2016), https://www.iowaattorneygeneral.gov/media/cms/La_James_Consent_Judgment_8C15E94D0A285.pdf. Although the document is styled "Proposed Consent Judgment," the court approved the proposed judgment as submitted. See id. at 36. See also Iowa Department of Justice Office of the Attorney General. (2016, June 30). La' James International College to forgive $2.1m in student debts, change business practices through consumer fraud settlement [News release]. Des Moines, IA. https://www.iowaattorneygeneral.gov/newsroom/la-james-international-college-settlement and Clayworth, J. (2016, June 30). La' James to forgive $2m in student debt as part of settlement. *Des Moines Register*. https://www.desmoinesregister.com/story/news/crime-and-courts/2016/06/30/la-james-forgive-2m-student-debt-part-settlement/86557382/. In 2020, La' James was sued again, this time for allegedly withholding students' financial aid. First Amend. Class Action Petition & Jury Demand, *Detmer v. La'James College of Hairstyling, Inc*., Law & Equity No. 05771 LACL147597 (May 12, 2020), https://www.defendstudents.org/cases/detmer-v-lajames/amended-complaint-5-13-2020. See also Student Defense. (2020, Mar. 20). Student Defense sues La'James International College for lying to students and withholding financial aid funds [Press release]. Des Moines, IA. https://www.defendstudents.org/news/student-defense-sues-lajames-for-withholding-funds and Kolodner, M., & Butrymowicz, S. (2020, Mar. 26). "It almost broke us": Lawsuit accuses for-profit cosmetology college of withholding student financial aid. *The Hechinger Report*. https://hechingerreport.org/it-almost-broke-us-lawsuit-accuses-for-profit-cosmetology-college-of-withholding-student-financial-aid/

Discussion

Our findings suggest the current licensing and training system is not serving aspiring cosmetologists. To legally enter the field, they generally must pay for lengthy and expensive schooling that often fails to graduate students on time, delaying their entry into the workforce and increasing costs. If they graduate and secure a job, pay will typically be low with little time off. A sizable number will need a second job to make ends meet. And they may have a difficult time repaying the loans that financed their education. Especially given that most cosmetology students come from lower-income backgrounds, these findings are concerning.

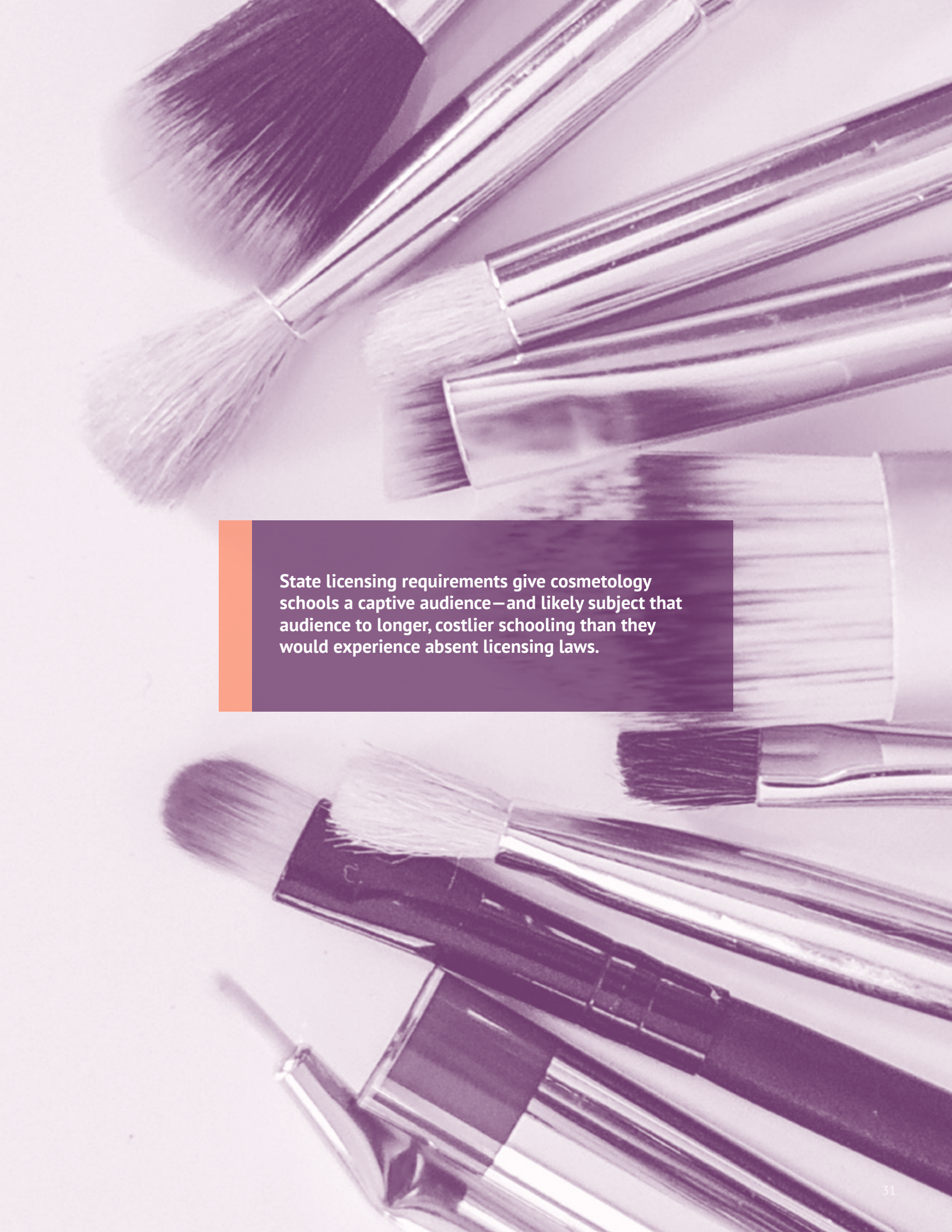
The current system may also fail to serve consumers of beauty services. It is not at all clear that cosmetology licensing mandates are tightly linked to protecting public health and safety. Not only is there wide variation—such as 1,000 hours in New York compared to 2,300 in Oregon—but small portions of required training explicitly address health and safety. Meanwhile, EMT training requirements nationally focus on health, and state licensing requirements max out at about 81 days' worth of training, with most being much shorter.[89] And, as discussed above, in some states, required training for tattooists focuses entirely on health and can be completed in only a few hours.[90] To the extent curricular mandates go beyond legitimate health and safety goals, additional training may serve only to limit entry into the field, suppress competition and innovation and increase prices for consumers. In fact, cosmetology licensing regimes often act as a barrier to niche services popular with customers, such as natural hair braiding, eyebrow threading, blow dry bars and makeup artistry, as well as special event services.

In addition, the current system is likely a bad deal for taxpayers—the funders of Pell Grants and guarantors of government loans used to finance pricey cosmetology schools. Indeed, prior research has found evidence that Title IV—that is, federal aid-eligible—for-profit cosmetology schools raise tuition above the actual cost of providing education to capture federal aid dollars. Using data from Florida, the study found Title IV for-profit cosmetology schools charge almost 70% more for tuition than their non-Title IV counterparts. The study also determined school quality, as measured by pass rates on state licensing exams, was not a driver of price differences.[91]

This suggests cosmetology schools may charge more without providing higher quality because taxpayer-financed federal student aid allows students to pay higher prices. Another study lends further support to this proposition: It found that more generous student aid encourages entry into for-profit institutions—such as those that educate most cosmetology students—particularly in counties where more students are eligible for aid due to high levels of adult poverty.[92] Put differently, taxpayer support may encourage students to choose more expensive schools and take on more debt while also encouraging schools to raise tuition. Taxpayers foot the bill, students are left with more debt and schools reap the rewards—without providing a better education.

Who is served by the current system of state-mandated cosmetology schooling? Considerable scholarship suggests licensing policy is dominated by occupational insiders, who may use regulation to limit competition and keep prices high.[93] In the case of cosmetology, state licensing requirements give cosmetology schools a captive audience—and likely subject that audience to longer, costlier schooling than they would experience absent licensing laws.

In short, the high costs of cosmetology school appear disconnected from the rewards cosmetologists can expect to reap, to say nothing of any risks the occupation might pose to the public. Instead, the entire system may be a failed model of professional development that primarily works to transfer wealth from students and taxpayers to cosmetology schools.



State licensing requirements give cosmetology schools a captive audience—and likely subject that audience to longer, costlier schooling than they would experience absent licensing laws.

Conclusion

In recent years, a wide array of scholars and institutions have called attention to the need for licensing reform.[94] Unnecessary or unnecessarily high burdens force aspiring workers to waste resources earning a license rather than earning a living while needlessly blocking others from working in an occupation entirely. This raises prices for consumers without ensuring a concomitant increase in quality. Moreover, research suggests licensing is of limited importance to consumers: Consumers care far more about reviews and prices.[95] And licensure's costs ripple throughout the wider economy.[96]

Among the widely agreed-upon principles of sound licensing policy are that less restrictive alternatives should be preferred and that, if an occupation is licensed, requirements should be narrowly tailored to, as an Obama White House report put it, "address legitimate public health and safety concerns to ease the burden of licensing on workers."[97]

Policymakers should closely examine cosmetology licensing laws to determine whether they are truly protecting public health and safety—or whether they are simply keeping would-be workers out of work.

Among the questions policymakers should ask:

1

Are there obviously safe niche practices that could be exempted from licensure altogether, such as applying makeup and shampooing, blow drying, styling and braiding hair?

2

How much of state-mandated curricula addresses the government's interest in public health and safety—and is the rest necessary?

3

All states already regulate cosmetology practices to protect public health with safety and sanitation mandates, typically enforced through inspections. How much does licensure add to these regulations?[98]

At a minimum, states should exempt obviously safe niche services and reduce required hours for cosmetology licensure, as some states have already done. But more must be done to support aspiring workers—and to help them get back to productive work as the pandemic continues and after it ends, when consumer demand for cosmetology and related services is likely to explode.[99] In the meantime, with continued social distancing and salon closures, expanding the range of settings where such services may be offered could create job opportunities quickly while helping to meet demand for haircuts and other traditional salon services at home or outdoors.[100] And to the extent states are loosening, or simply not enforcing, the rules about where services may be offered during the pandemic, they should make these changes permanent. Reforms like these can help aspiring cosmetologists, consumers and the economy recover.

Consumers, not the government, should be in charge of deciding whether a person is good at cutting hair or doing nails.

But policymakers can think bigger still: A year after freeing Minnesota makeup artists from unnecessary cosmetology licensing, the Minnesota Legislature considered a trailblazing bill that would have repealed all cosmetology licenses in the state and replaced them with facility or salon licenses subject to municipal inspections, similar to how restaurants are regulated.[101] Importantly, aspiring workers would still have been able to attend cosmetology school if they wished to learn skills and signal to potential employers and customers that they had obtained training.

Indeed, that is precisely what some hairdressers and barbers do in the United Kingdom, where they are not licensed but can instead voluntarily become certified by earning certain qualifications—which usually involves completing a cosmetology program.[102] That voluntary certification allows workers to advertise themselves as State Registered Hairdressers, which could make them more marketable.[103] Similarly, and for similar reasons, many aspiring chefs choose to attend culinary school even though no state requires it as a condition for working in the occupation.

Minnesota's bill has since been watered down.[104] However, had it become law in its earlier form, it would have advanced the state's interest in protecting public health and safety without barring entry to cosmetology and related occupations. This first-of-its-kind reform would have left consumers, not the government, in charge of deciding whether a person is good at cutting hair or doing nails—as they should be.

Appendix A: State-by-State Results

Table A1: Average Cosmetology Program Cost by State, 2011–2012 to 2016–2017

	2011–2012	2012–2013	2013–2014	2014–2015	2015–2016	2016–2017	6-Year Average	Average No. of Programs
Alabama	$14,044	$14,390	$14,247	$14,236	$14,523	$15,085	$14,437	8.3
Alaska	NA	NA	NA	NA	NA	NA	NA	NA
Arizona	$16,569	$16,727	$16,863	$17,334	$17,273	$17,529	$17,019	28.7
Arkansas	$12,695	$13,531	$14,006	$14,633	$14,937	$15,737	$14,149	19.2
California	$16,184	$16,551	$17,271	$17,632	$17,547	$17,807	$17,146	100.3
Colorado	$16,796	$17,274	$17,520	$17,777	$17,578	$18,141	$17,474	22.2
Connecticut	$17,896	$19,456	$18,911	$19,776	$19,488	$20,559	$19,357	9.5
Delaware	$14,990	$16,000	$16,056	$17,000	$17,000	$17,546	$16,432	3.0
District of Columbia	$12,000	$14,000	$15,500	$17,000	$17,000	$18,000	$15,583	1.0
Florida	$13,484	$13,672	$13,788	$14,182	$14,416	$14,547	$14,021	66.2
Georgia	$15,682	$16,452	$17,015	$17,807	$19,126	$19,735	$17,569	20.7
Hawaii	$21,150	$21,150	$22,050	$22,208	$22,208	$22,208	$21,829	1.0
Idaho	$15,517	$15,570	$15,853	$16,658	$17,011	$16,902	$16,243	17.0
Illinois	$16,891	$17,214	$17,401	$17,971	$18,248	$18,443	$17,661	62.5
Indiana	$14,433	$14,749	$15,737	$16,215	$16,487	$17,204	$15,723	32.5
Iowa	$18,687	$19,329	$19,472	$19,844	$19,946	$20,034	$19,508	19.0
Kansas	$15,878	$16,346	$16,869	$17,706	$17,203	$17,509	$16,860	13.8
Kentucky	$14,156	$14,619	$15,287	$16,244	$17,528	$17,611	$15,662	24.8
Louisiana	$13,182	$13,784	$14,048	$14,615	$15,196	$15,005	$14,307	27.3
Maine	$14,528	$14,804	$14,763	$15,389	$15,451	$17,401	$15,279	4.0
Maryland	$17,666	$17,847	$18,381	$17,784	$18,593	$19,152	$18,226	20.5
Massachusetts	$12,503	$12,791	$13,053	$13,654	$13,990	$14,939	$13,378	18.5
Michigan	$13,487	$14,053	$14,549	$15,308	$15,226	$16,258	$14,793	38.7
Minnesota	$16,415	$16,954	$17,254	$18,111	$17,859	$18,560	$17,398	18.7
Mississippi	$10,752	$10,965	$11,844	$13,031	$13,521	$14,652	$12,371	13.2
Missouri	$13,848	$14,299	$14,858	$15,499	$15,085	$14,484	$14,633	30.8
Montana	$11,707	$12,355	$12,896	$13,074	$13,935	$13,955	$12,933	7.0
Nebraska	$17,251	$17,660	$18,264	$18,439	$21,306	$21,430	$19,058	7.0

	2011–2012	2012–2013	2013–2014	2014–2015	2015–2016	2016–2017	6-Year Average	Average No. of Programs
Nevada	$20,151	$20,290	$20,091	$20,971	$20,753	$20,558	$20,443	10.8
New Hampshire	$17,978	$18,986	$19,718	$19,682	$19,818	$20,125	$19,413	8.5
New Jersey	$15,546	$15,681	$16,271	$17,024	$17,110	$17,455	$16,531	24.3
New Mexico	$14,989	$16,077	$17,123	$17,078	$17,118	$17,168	$16,630	4.8
New York	$12,269	$12,887	$13,368	$13,487	$13,933	$14,235	$13,381	40.3
North Carolina	$15,852	$15,966	$17,631	$17,760	$17,873	$18,112	$17,083	26.0
North Dakota	$14,177	$14,487	$15,100	$16,432	$16,776	$16,892	$15,644	7.0
Ohio	$15,572	$16,175	$16,288	$17,207	$17,084	$17,870	$16,592	43.5
Oklahoma	$11,435	$11,659	$11,881	$13,358	$13,656	$12,953	$12,461	24.8
Oregon	$18,687	$19,255	$19,422	$19,687	$19,375	$19,572	$19,350	22.0
Pennsylvania	$15,709	$16,075	$16,548	$17,316	$17,417	$17,870	$16,802	46.3
Rhode Island	$17,715	$18,678	$18,253	$18,753	$18,265	$18,365	$18,320	4.7
South Carolina	$16,394	$16,603	$16,792	$17,120	$17,477	$17,869	$16,994	21.7
South Dakota	$13,493	$14,361	$14,511	$14,874	$14,991	$14,991	$14,537	3.0
Tennessee	$14,434	$15,174	$15,782	$16,406	$16,146	$16,751	$15,733	34.3
Texas	$14,390	$14,890	$15,040	$15,839	$15,812	$15,793	$15,274	90.7
Utah	$13,707	$13,688	$13,856	$14,695	$15,435	$15,081	$14,393	21.7
Vermont	$16,500	$17,000	$17,500	$17,800	$18,350	$18,625	$17,409	1.3
Virginia	$16,211	$17,037	$17,247	$17,435	$17,884	$17,882	$17,264	17.8
Washington	$15,112	$15,448	$16,116	$16,200	$16,716	$17,191	$16,078	21.7
West Virginia	$13,343	$13,832	$14,633	$14,885	$15,112	$14,269	$14,281	6.7
Wisconsin	$16,749	$17,342	$17,688	$18,152	$18,270	$17,971	$17,669	23.0
Wyoming	$15,500	$15,550	$16,025	$17,025	$17,750	$18,800	$16,775	1.0
Average	**$15,126**	**$15,566**	**$16,540**	**$16,540**	**$16,667**	**$16,923**	**$16,104**	**22.8**
Minimum	*$10,752*	*$10,965*	*$11,844*	*$13,031*	*$13,521*	*$12,953*	*$10,752*	*1.0*
Maximum	*$21,150*	*$21,150*	*$22,050*	*$22,208*	*$22,208*	*$22,208*	*$22,208*	*100.3*

Source: IPEDS Program Sample. See Appendix B for details. NAs indicate a lack of data availability. Information was not available at the program level for Alaska.

Table A2: Percent of Cosmetology Students Who Received Pell Grants by State, 2011–2012 to 2016–2017

	2011–2012	2012–2013	2013–2014	2014–2015	2015–2016	2016–2017	6-Year Average	Average No. of Schools
Alabama	72.0%	67.7%	73.3%	55.5%	56.0%	63.0%	65.3%	2.5
Arizona	73.7%	73.3%	74.6%	70.6%	61.7%	60.0%	70.7%	6.2
Arkansas	65.5%	69.4%	72.3%	67.8%	75.0%	82.5%	71.5%	4.5
California	54.5%	54.7%	63.9%	61.4%	63.7%	63.1%	60.3%	15.8
Colorado	66.7%	66.6%	64.8%	65.9%	62.0%	74.5%	66.0%	6.8
Connecticut	48.6%	32.0%	51.8%	61.6%	67.3%	66.0%	56.7%	4.7
Delaware	41.0%	43.0%	58.0%	NA	NA	NA	47.3%	3.8
Florida	61.6%	64.5%	64.6%	69.6%	57.2%	61.9%	63.7%	11.2
Georgia	54.5%	76.5%	76.6%	71.4%	76.4%	79.3%	72.7%	8.2
Idaho	40.7%	69.4%	57.3%	60.0%	58.5%	66.3%	61.0%	5.7
Illinois	68.4%	73.2%	68.9%	69.0%	62.5%	74.3%	69.7%	9.5
Indiana	68.1%	64.2%	73.0%	72.4%	67.0%	67.0%	69.2%	7.7
Iowa	59.8%	76.8%	71.3%	61.8%	61.6%	52.0%	63.8%	4.0
Kansas	58.0%	61.3%	62.6%	61.0%	57.3%	56.3%	60.1%	5.3
Kentucky	65.8%	93.7%	60.3%	82.0%	58.0%	48.0%	70.2%	2.7
Louisiana	52.2%	58.6%	71.2%	68.7%	73.0%	67.0%	63.4%	5.7
Maine	NA	64.0%	NA	NA	NA	NA	64.0%	1.0
Maryland	72.5%	71.5%	77.0%	66.8%	74.1%	67.8%	71.9%	11.8
Massachusetts	58.5%	61.4%	65.1%	70.9%	57.3%	64.1%	62.6%	11.2
Michigan	73.1%	72.1%	78.7%	73.4%	66.6%	85.0%	73.3%	6.5
Minnesota	61.1%	65.9%	68.1%	63.2%	60.0%	56.2%	63.6%	10.2
Mississippi	62.0%	82.0%	76.0%	89.0%	83.0%	60.0%	75.4%	1.7
Missouri	67.6%	65.8%	67.2%	70.0%	66.3%	68.3%	67.6%	5.5
Montana	51.7%	66.0%	63.5%	62.3%	53.3%	54.0%	59.5%	4.8

	2011–2012	2012–2013	2013–2014	2014–2015	2015–2016	2016–2017	6-Year Average	Average No. of Schools
Nebraska	NA	NA	65.0%	57.0%	64.5%	55.0%	61.2%	1.5
Nevada	60.3%	33.0%	53.0%	57.0%	57.0%	58.0%	54.9%	5.8
New Hampshire	43.0%	50.0%	49.5%	44.0%	38.3%	47.0%	43.9%	2.0
New Jersey	61.3%	55.0%	67.5%	86.0%	63.5%	61.0%	64.8%	2.7
New Mexico	60.0%	47.0%	NA	NA	NA	NA	53.5%	1.0
New York	59.1%	64.4%	58.9%	52.6%	55.4%	58.1%	57.9%	23.3
North Carolina	63.5%	72.5%	74.7%	74.2%	68.4%	68.8%	70.4%	10.8
North Dakota	51.7%	48.0%	53.7%	47.7%	41.5%	38.0%	47.6%	2.3
Ohio	67.3%	75.4%	77.6%	77.6%	70.2%	71.3%	73.8%	13.2
Oklahoma	NA	66.0%	51.0%	NA	56.0%	47.0%	54.2%	1.3
Pennsylvania	63.3%	77.0%	63.7%	73.5%	69.3%	53.7%	66.6%	2.5
Rhode Island	33.0%	43.0%	64.0%	52.0%	76.0%	53.0%	57.6%	2.3
South Carolina	68.1%	64.6%	73.6%	70.3%	66.4%	68.0%	68.7%	5.8
South Dakota	55.0%	40.0%	39.0%	45.0%	57.0%	46.0%	47.0%	2.8
Tennessee	70.2%	69.1%	74.6%	70.8%	73.3%	58.8%	70.6%	12.0
Texas	66.9%	73.2%	78.2%	75.8%	66.1%	61.8%	71.9%	13.8
Utah	49.5%	55.9%	69.5%	49.6%	42.1%	49.6%	52.4%	9.7
Virginia	58.2%	70.1%	71.9%	70.8%	60.7%	66.6%	66.9%	12.0
Washington	75.2%	48.8%	62.0%	57.0%	52.0%	52.0%	59.6%	4.3
West Virginia	NA	NA	53.0%	NA	NA	NA	53.0%	1.0
Wisconsin	58.2%	56.7%	67.4%	69.3%	67.7%	66.0%	64.0%	9.0
Average	**62.2%**	**66.4%**	**69.0%**	**67.0%**	**62.9%**	**63.1%**	**65.4%**	**7.0**
Minimum	*33.0%*	*32.0%*	*39.0%*	*44.0%*	*38.3%*	*38.0%*	*32.0%*	*1.0*
Maximum	*75.2%*	*93.7%*	*78.7%*	*89.0%*	*83.0%*	*85.0%*	*93.7%*	*23.3*

Source: IPEDS School Sample. See Appendix B for details. NAs indicate a lack of data availability. Information was not available at the school level for Alaska, Hawaii, Oregon, Vermont, Wyoming or the District of Columbia.

Table A3: Average Pell Grant Awards Received by Cosmetology Students by State, 2011–2012 to 2016–2017

	2011–2012	2012–2013	2013–2014	2014–2015	2015–2016	2016–2017	6-Year Average	Average No. of Schools
Alabama	$3,152	$3,611	$4,433	$3,846	$4,374	$4,723	$4,070	2.5
Arizona	$4,209	$3,915	$4,090	$4,182	$4,447	$4,530	$4,164	6.2
Arkansas	$4,117	$4,069	$4,131	$4,255	$5,052	$4,676	$4,352	4.5
California	$3,889	$3,773	$3,901	$4,281	$4,283	$4,253	$4,073	15.8
Colorado	$4,253	$4,109	$3,764	$4,392	$4,372	$4,166	$4,118	6.8
Connecticut	$3,275	$3,859	$3,516	$4,315	$3,981	$4,533	$3,934	4.7
Delaware	$3,969	$3,543	$3,685	NA	NA	NA	$3,732	3.8
Florida	$3,852	$3,834	$3,828	$3,913	$4,041	$3,954	$3,893	11.2
Georgia	$4,235	$3,949	$3,930	$4,231	$4,497	$4,306	$4,201	8.2
Idaho	$3,898	$4,447	$4,026	$4,071	$4,415	$4,982	$4,320	5.7
Illinois	$4,125	$3,868	$3,930	$3,866	$3,749	$4,686	$3,978	9.5
Indiana	$4,533	$4,105	$3,981	$3,973	$3,753	$4,113	$4,117	7.7
Iowa	$4,165	$4,182	$4,272	$4,587	$4,641	$4,200	$4,353	4.0
Kansas	$4,071	$4,158	$4,084	$4,000	$3,993	$4,331	$4,096	5.3
Kentucky	$4,588	$4,612	$4,333	$5,688	$5,051	$4,571	$4,749	2.7
Louisiana	$4,028	$4,297	$3,894	$4,214	$4,307	$4,134	$4,128	5.7
Maine	NA	$3,946	NA	NA	NA	NA	$3,946	1.0
Maryland	$3,802	$3,632	$3,432	$3,985	$3,742	$3,917	$3,735	11.8
Massachusetts	$4,049	$3,965	$3,757	$3,991	$4,037	$3,751	$3,931	11.2
Michigan	$4,288	$4,347	$4,454	$4,479	$4,762	$4,494	$4,447	6.5
Minnesota	$4,277	$3,764	$3,886	$4,023	$4,299	$3,943	$4,008	10.2
Mississippi	$3,835	$3,711	$4,496	$4,031	$2,673	$4,368	$3,944	1.7
Missouri	$4,188	$3,876	$4,064	$4,020	$4,104	$4,372	$4,065	5.5
Montana	$4,436	$4,282	$4,641	$4,711	$4,510	$4,144	$4,483	4.8

	2011–2012	2012–2013	2013–2014	2014–2015	2015–2016	2016–2017	6-Year Average	Average No. of Schools
Nebraska	NA	NA	$4,619	$5,392	$4,651	$4,620	$4,786	1.5
Nevada	$3,897	$3,712	$3,806	$4,355	$4,495	$4,285	$4,043	5.8
New Hampshire	$4,500	$3,330	$4,681	$3,702	$4,403	$4,276	$4,230	2.0
New Jersey	$4,487	$4,322	$4,279	$4,189	$4,205	$4,558	$4,353	2.7
New Mexico	$4,288	$4,532	NA	NA	NA	NA	$4,410	1.0
New York	$3,946	$3,675	$4,012	$3,981	$4,169	$4,130	$3,992	23.3
North Carolina	$4,021	$4,052	$3,853	$4,096	$4,108	$4,601	$4,087	10.8
North Dakota	$4,439	$4,458	$4,179	$3,529	$4,459	$4,483	$4,231	2.3
Ohio	$4,315	$4,229	$4,088	$4,152	$4,389	$4,098	$4,207	13.2
Oklahoma	NA	$3,972	$4,134	NA	$4,658	$4,373	$4,254	1.3
Pennsylvania	$4,150	$4,098	$4,654	$4,708	$4,816	$4,024	$4,442	2.5
Rhode Island	$3,554	$3,945	$3,660	$4,086	$3,275	$4,249	$3,713	2.3
South Carolina	$3,993	$4,190	$3,938	$4,327	$4,153	$4,239	$4,127	5.8
South Dakota	$3,679	$3,765	$3,819	$4,407	$4,365	$4,631	$4,111	2.8
Tennessee	$3,904	$3,850	$3,784	$4,207	$4,416	$4,258	$4,002	12.0
Texas	$4,019	$4,259	$4,390	$4,193	$4,287	$3,976	$4,201	13.8
Utah	$4,319	$4,019	$4,195	$3,883	$4,165	$3,731	$4,064	9.7
Virginia	$3,887	$3,850	$3,876	$4,036	$4,506	$4,089	$4,021	12.0
Washington	$5,053	$4,333	$4,573	$4,155	$3,935	$4,337	$4,490	4.3
West Virginia	NA	NA	$4,100	NA	NA	NA	$4,100	1.0
Wisconsin	$4,000	$4,095	$4,140	$4,559	$4,369	$4,391	$4,227	9.0
Average	**$4,093**	**$4,003**	**$4,000**	**$4,146**	**$4,260**	**$4,204**	**$4,101**	**7.0**
Minimum	*$3,152*	*$3,330*	*$3,432*	*$3,529*	*$2,673*	*$3,731*	*$2,673*	*1.0*
Maximim	$5,053	$4,612	$4,681	$5,688	$5,052	$4,982	$5,688	23.3

Source: IPEDS School Sample. See Appendix B for details. NAs indicate a lack of data availability. Information was not available at the school level for Alaska, Hawaii, Oregon, Vermont, Wyoming or the District of Columbia.

Table A4: Percent of Cosmetology Students Who Borrowed Federal Student Loans, 2011–2012 to 2016–2017

	2011–2012	2012–2013	2013–2014	2014–2015	2015–2016	2016–2017	6-Year Average	Average No. of Schools
Alabama	61.0%	70.7%	79.3%	60.0%	60.5%	69.7%	68.1%	2.5
Arizona	74.0%	75.9%	73.7%	68.9%	68.3%	60.5%	71.5%	6.2
Arkansas	45.8%	44.6%	55.3%	52.8%	59.3%	66.3%	53.0%	4.5
California	54.1%	59.2%	57.1%	57.7%	62.0%	57.1%	58.0%	15.8
Colorado	71.2%	68.1%	65.0%	64.3%	65.0%	79.0%	67.6%	6.8
Connecticut	51.2%	50.0%	63.5%	66.4%	71.2%	74.2%	63.9%	4.7
Delaware	59.0%	14.0%	64.0%	NA	NA	NA	45.7%	3.8
Florida	65.6%	69.2%	67.6%	70.6%	62.6%	65.8%	67.3%	11.2
Georgia	57.9%	68.6%	73.4%	67.2%	72.5%	76.8%	69.4%	8.2
Idaho	53.7%	67.6%	50.0%	48.0%	61.0%	61.0%	58.7%	5.7
Illinois	78.7%	79.8%	74.3%	70.6%	68.5%	79.8%	75.5%	9.5
Indiana	67.8%	65.0%	70.0%	71.7%	62.3%	54.0%	67.8%	7.7
Iowa	72.8%	84.5%	67.5%	66.3%	74.4%	66.5%	72.1%	4.0
Kansas	64.3%	72.4%	63.6%	63.7%	62.7%	60.0%	65.5%	5.3
Kentucky	19.3%	17.7%	26.0%	0.0%	27.5%	0.0%	17.5%	2.7
Louisiana	40.5%	61.0%	56.7%	50.3%	21.3%	39.0%	47.9%	5.7
Maine	NA	65.0%	NA	NA	NA	NA	65.0%	1.0
Maryland	71.5%	71.7%	77.9%	66.8%	79.1%	70.7%	73.1%	11.8
Massachusetts	66.3%	69.0%	65.6%	74.6%	62.6%	69.3%	67.9%	11.2
Michigan	76.0%	62.9%	65.0%	62.5%	45.2%	22.0%	62.1%	6.5
Minnesota	65.1%	66.3%	71.3%	67.2%	63.5%	63.8%	66.8%	10.2
Mississippi	0.0%	0.0%	30.0%	75.0%	90.0%	68.0%	41.9%	1.7
Missouri	77.4%	73.3%	75.4%	59.0%	40.7%	77.0%	69.6%	5.5
Montana	51.7%	54.5%	56.5%	58.0%	47.7%	54.5%	54.2%	4.8

	2011–2012	2012–2013	2013–2014	2014–2015	2015–2016	2016–2017	6-Year Average	Average No. of Schools
Nebraska	NA	NA	58.0%	64.0%	68.0%	58.0%	63.2%	1.5
Nevada	69.3%	58.0%	57.0%	61.0%	60.0%	57.0%	62.6%	5.8
New Hampshire	61.0%	71.0%	93.0%	60.0%	47.5%	67.5%	63.6%	2.0
New Jersey	70.3%	66.7%	70.8%	88.5%	72.5%	72.7%	72.6%	2.7
New Mexico	67.0%	62.0%	NA	NA	NA	NA	64.5%	1.0
New York	56.0%	64.3%	56.6%	47.8%	54.9%	55.5%	55.7%	23.3
North Carolina	53.3%	64.6%	56.8%	55.4%	56.3%	58.5%	57.9%	10.8
North Dakota	61.0%	56.0%	56.3%	51.0%	46.0%	50.0%	54.1%	2.3
Ohio	60.7%	72.3%	67.9%	67.8%	60.7%	63.1%	66.4%	13.2
Oklahoma	NA	85.0%	28.0%	NA	52.0%	0.0%	38.6%	1.3
Pennsylvania	76.3%	93.5%	68.7%	81.0%	74.0%	65.3%	75.8%	2.5
Rhode Island	60.0%	65.0%	67.5%	62.0%	80.5%	65.0%	68.5%	2.3
South Carolina	52.3%	46.3%	65.3%	51.6%	60.6%	49.0%	54.1%	5.8
South Dakota	91.0%	42.0%	42.0%	48.0%	50.0%	54.0%	54.5%	2.8
Tennessee	67.4%	66.6%	67.3%	62.8%	58.4%	59.0%	64.8%	12.0
Texas	63.1%	73.3%	78.3%	68.3%	59.0%	50.6%	68.0%	13.8
Utah	33.8%	44.5%	60.2%	37.1%	20.0%	38.4%	38.7%	9.7
Virginia	61.5%	70.8%	71.6%	69.6%	60.3%	67.4%	67.3%	12.0
Washington	71.8%	54.2%	68.3%	62.3%	70.5%	69.0%	64.8%	4.3
West Virginia	NA	NA	50.0%	NA	NA	NA	50.0%	1.0
Wisconsin	67.5%	65.3%	63.6%	69.2%	69.0%	51.5%	65.4%	9.0
Average	**61.5%**	**65.7%**	**66.1%**	**62.5%**	**60.0%**	**60.8%**	**63.1%**	**7.0**
Minimum	*0.0%*	*0.0%*	*26.0%*	*0.0%*	*20.0%*	*0.0%*	*0.0%*	*1.0*
Maximum	*91.0%*	*93.5%*	*93.0%*	*88.5%*	*90.0%*	*79.8%*	*93.5%*	*23.3*

Source: IPEDS School Sample. See Appendix B for details. NAs indicate a lack of data availability. Information was not available at the school level for Alaska, Hawaii, Oregon, Vermont, Wyoming or the District of Columbia.

Table A5: Average Federal Student Loans Borrowed by Cosmetology Students by State, 2011–2012 to 2016–2017

	2011–2012	2012–2013	2013–2014	2014–2015	2015–2016	2016–2017	6-Year Average	Average No. of Schools
Alabama	$6,701	$6,914	$9,808	$9,818	$9,832	$8,602	$8,578	2.5
Arizona	$8,597	$8,369	$8,688	$8,844	$8,521	$8,513	$8,590	6.2
Arkansas	$7,150	$7,720	$8,636	$7,906	$7,317	$8,332	$7,809	4.5
California	$6,688	$7,527	$7,880	$7,463	$7,051	$7,467	$7,337	15.8
Colorado	$8,347	$8,394	$7,883	$8,189	$7,930	$8,162	$8,166	6.8
Connecticut	$6,667	$7,547	$6,607	$6,773	$5,782	$7,369	$6,709	4.7
Delaware	$6,852	$11,195	$8,228	NA	NA	NA	$8,758	3.8
Florida	$6,917	$7,236	$7,216	$7,699	$7,082	$7,310	$7,256	11.2
Georgia	$7,304	$7,914	$7,972	$7,437	$7,839	$8,797	$7,852	8.2
Idaho	$7,491	$6,857	$6,897	$6,785	$6,980	$7,508	$7,033	5.7
Illinois	$8,141	$7,581	$7,638	$8,189	$6,736	$6,308	$7,705	9.5
Indiana	$7,679	$8,155	$7,685	$7,033	$5,668	$6,250	$7,491	7.7
Iowa	$6,658	$5,677	$6,494	$6,228	$6,657	$6,368	$6,359	4.0
Kansas	$8,314	$8,375	$8,993	$8,122	$8,191	$7,729	$8,363	5.3
Kentucky	$5,370	$6,264	$5,325	$0	$8,953	$0	$6,124	2.7
Louisiana	$8,424	$9,507	$10,752	$7,050	$6,717	$5,214	$8,787	5.7
Maine	NA	$6,814	NA	NA	NA	NA	$6,814	1.0
Maryland	$5,792	$6,262	$5,872	$6,744	$6,553	$7,352	$6,398	11.8
Massachusetts	$6,094	$6,148	$6,844	$6,218	$6,692	$6,793	$6,423	11.2
Michigan	$8,620	$7,983	$9,663	$8,036	$8,446	$3,274	$8,322	6.5
Minnesota	$8,069	$7,558	$7,615	$8,009	$7,772	$6,501	$7,693	10.2
Mississippi	$0	$0	$6,160	$5,911	$3,020	$4,798	$4,972	1.7
Missouri	$8,527	$7,773	$7,400	$8,150	$7,531	$6,791	$7,793	5.5
Montana	$6,345	$5,808	$6,340	$5,714	$5,233	$5,311	$5,840	4.8

	2011–2012	2012–2013	2013–2014	2014–2015	2015–2016	2016–2017	6-Year Average	Average No. of Schools
Nebraska	NA	NA	$10,234	$9,754	$9,237	$8,753	$9,443	1.5
Nevada	$7,335	$8,668	$9,322	$8,951	$9,323	$8,633	$8,363	5.8
New Hampshire	$6,707	$6,256	$6,180	$7,735	$7,629	$7,343	$7,166	2.0
New Jersey	$5,758	$5,964	$6,316	$5,862	$5,583	$6,691	$6,082	2.7
New Mexico	$8,445	$10,154	NA	NA	NA	NA	$9,300	1.0
New York	$6,076	$6,530	$7,245	$7,145	$6,848	$6,447	$6,735	23.3
North Carolina	$6,760	$7,062	$7,496	$7,493	$8,215	$7,164	$7,280	10.8
North Dakota	$7,688	$7,026	$6,713	$5,445	$7,030	$8,300	$6,955	2.3
Ohio	$7,553	$7,425	$7,698	$7,685	$7,850	$7,896	$7,632	13.2
Oklahoma	NA	$6,790	$7,737	NA	$8,323	$0	$7,617	1.3
Pennsylvania	$6,570	$5,551	$6,349	$8,047	$9,463	$7,170	$7,331	2.5
Rhode Island	$8,044	$9,145	$8,605	$8,869	$4,954	$6,364	$7,442	2.3
South Carolina	$7,459	$7,306	$7,081	$6,709	$5,710	$5,085	$6,732	5.8
South Dakota	$6,361	$5,368	$5,543	$5,734	$7,333	$7,981	$6,387	2.8
Tennessee	$7,427	$7,590	$7,418	$8,312	$7,147	$7,266	$7,569	12.0
Texas	$7,758	$8,156	$8,152	$7,982	$6,648	$7,073	$7,817	13.8
Utah	$5,482	$5,506	$4,987	$5,671	$5,296	$5,261	$5,410	9.7
Virginia	$7,441	$7,553	$7,723	$7,329	$7,110	$7,508	$7,456	12.0
Washington	$6,327	$7,285	$9,823	$7,986	$6,834	$7,438	$7,505	4.3
West Virginia	NA	NA	$4,569	NA	NA	NA	$4,569	1.0
Wisconsin	$8,163	$8,420	$9,198	$9,232	$8,771	$8,440	$8,765	9.0
Average	**$7,234**	**$7,383**	**$7,604**	**$7,538**	**$7,149**	**$7,126**	**$7,368**	**7.0**
Minimum	*$0*	*$0*	*$4,569*	*$0*	*$3,020*	*$0*	*$0*	*1.0*
Maximum	*$8,620*	*$11,195*	*$10,752*	*$9,818*	*$9,832*	*$8,797*	*$11,195*	*23.3*

Source: IPEDS School Sample. See Appendix B for details. NAs indicate a lack of data availability. Information was not available at the school level for Alaska, Hawaii, Oregon, Vermont, Wyoming or the District of Columbia.

Table A6: Percent of Cosmetology Students Who Graduated on Time, 2011–2012 to 2016–2017

	2011–2012	2012–2013	2013–2014	2014–2015	2015–2016	2016–2017	6-Year Average	Average No. of Schools
Alabama	14.5%	69.0%	19.5%	22.0%	5.5%	8.5%	18.7%	2.5
Arizona	21.2%	16.1%	17.5%	16.5%	5.3%	10.0%	15.6%	6.2
Arkansas	48.8%	19.2%	29.3%	36.5%	53.8%	45.0%	37.7%	4.5
California	21.2%	19.1%	24.1%	20.5%	15.8%	12.0%	18.7%	15.8
Colorado	8.8%	10.2%	19.9%	30.9%	0.7%	0.0%	14.7%	6.8
Connecticut	20.0%	26.7%	10.0%	15.3%	34.3%	30.4%	24.0%	4.7
Delaware	0.0%	0.0%	5.0%	NA	NA	NA	1.7%	3.8
Florida	15.0%	14.9%	14.7%	32.7%	8.4%	9.3%	16.8%	11.2
Georgia	29.0%	29.3%	43.0%	27.9%	20.6%	4.4%	25.0%	8.2
Idaho	26.3%	56.5%	51.3%	45.7%	60.0%	64.3%	51.6%	5.7
Illinois	22.4%	21.9%	23.6%	36.5%	40.3%	41.0%	28.1%	9.5
Indiana	35.0%	17.1%	20.0%	22.3%	53.3%	0.0%	24.7%	7.7
Iowa	29.8%	34.5%	51.8%	57.5%	43.8%	36.3%	42.3%	4.0
Kansas	21.0%	26.2%	27.7%	23.3%	9.3%	3.0%	21.1%	5.3
Kentucky	65.3%	45.0%	62.7%	72.0%	44.0%	100.0%	61.1%	2.7
Louisiana	23.8%	19.3%	13.2%	46.7%	32.7%	26.0%	24.2%	5.7
Maine	NA	16.0%	NA	NA	NA	NA	16.0%	1.0
Maryland	28.0%	22.4%	37.9%	44.1%	33.8%	41.7%	35.0%	11.8
Massachusetts	14.9%	13.8%	14.9%	30.2%	16.6%	24.4%	18.5%	11.2
Michigan	11.2%	29.4%	11.5%	13.4%	39.8%	0.0%	19.9%	6.5
Minnesota	23.3%	20.5%	19.4%	33.4%	25.2%	21.0%	23.8%	10.2
Mississippi	2.0%	0.0%	46.5%	89.0%	64.0%	100.0%	49.7%	1.7
Missouri	30.0%	11.3%	19.9%	37.3%	37.7%	56.3%	28.0%	5.5
Montana	56.0%	69.7%	74.0%	71.3%	69.0%	35.5%	65.1%	4.8

	2011–2012	2012–2013	2013–2014	2014–2015	2015–2016	2016–2017	6-Year Average	Average No. of Schools
Nebraska	NA	NA	68.0%	54.0%	53.0%	52.0%	56.8%	1.5
Nevada	29.7%	1.0%	1.0%	1.0%	2.0%	2.0%	12.0%	5.8
New Hampshire	26.0%	26.0%	8.5%	20.0%	29.0%	19.0%	21.9%	2.0
New Jersey	3.0%	32.7%	19.8%	42.5%	54.5%	34.7%	31.9%	2.7
New Mexico	41.0%	0.0%	NA	NA	NA	NA	20.5%	1.0
New York	25.8%	23.9%	24.9%	30.0%	23.7%	27.8%	26.1%	23.3
North Carolina	55.8%	38.3%	18.2%	26.9%	27.5%	32.6%	33.7%	10.8
North Dakota	40.0%	19.0%	22.7%	35.3%	49.0%	35.5%	32.5%	2.3
Ohio	23.1%	26.7%	27.1%	22.7%	34.9%	26.4%	26.2%	13.2
Oklahoma	NA	0.0%	30.5%	NA	0.0%	9.0%	17.5%	1.3
Pennsylvania	7.7%	31.5%	15.0%	12.3%	33.0%	15.0%	17.4%	2.5
Rhode Island	1.0%	4.0%	4.0%	11.0%	0.0%	0.0%	3.4%	2.3
South Carolina	34.0%	24.4%	22.0%	28.4%	29.5%	28.6%	27.3%	5.8
South Dakota	42.0%	20.0%	0.0%	9.0%	8.0%	26.0%	17.5%	2.8
Tennessee	18.2%	17.9%	17.7%	17.1%	25.4%	36.0%	20.4%	12.0
Texas	29.6%	18.3%	27.3%	31.5%	32.3%	22.2%	27.1%	13.8
Utah	61.8%	64.9%	54.6%	45.3%	61.1%	53.7%	57.2%	9.7
Virginia	17.2%	25.8%	14.5%	26.0%	17.5%	17.5%	20.0%	12.0
Washington	30.3%	13.3%	35.0%	53.3%	43.5%	29.0%	33.9%	4.3
West Virginia	NA	NA	7.0%	NA	NA	NA	7.0%	1.0
Wisconsin	37.4%	47.6%	16.8%	39.2%	23.8%	41.3%	33.3%	9.0
Average	**27.6%**	**25.4%**	**24.3%**	**30.8%**	**28.4%**	**27.0%**	**27.2%**	**7.0**
Minimum	*0.0%*	*0.0%*	*0.0%*	*1.0%*	*0.0%*	*0.0%*	*0.0%*	*1.0*
Maximum	*65.3%*	*69.7%*	*74.0%*	*89.0%*	*69.0%*	*100.0%*	*100.0%*	*23.3*

Source: IPEDS School Sample. See Appendix B for details. NAs indicate a lack of data availability. Information was not available at the school level for Alaska, Hawaii, Oregon, Vermont, Wyoming or the District of Columbia.

Table A7: Percent of Cosmetology Students Who Graduated Within 18 Months, 2011–2012 to 2016–2017

	2011–2012	2012–2013	2013–2014	2014–2015	2015–2016	2016–2017	6-Year Average	Average No. of Schools
Alabama	85.5%	85.0%	60.5%	22.0%	71.0%	57.0%	65.5%	2.5
Arizona	50.0%	56.4%	48.3%	57.2%	60.7%	64.8%	55.3%	6.2
Arkansas	77.3%	61.0%	56.5%	65.3%	68.5%	64.3%	65.3%	4.5
California	65.4%	66.4%	73.6%	70.6%	68.2%	60.5%	67.7%	15.8
Colorado	46.2%	51.7%	53.9%	51.3%	46.7%	40.3%	49.8%	6.8
Connecticut	65.8%	76.3%	76.5%	75.7%	77.0%	87.2%	76.5%	4.7
Delaware	87.0%	66.0%	70.0%	NA	NA	NA	74.3%	3.8
Florida	66.0%	55.3%	62.8%	59.5%	70.6%	68.3%	63.5%	11.2
Georgia	74.3%	72.9%	76.0%	63.6%	56.6%	44.0%	63.7%	8.2
Idaho	73.7%	78.0%	75.0%	72.7%	95.5%	80.3%	78.0%	5.7
Illinois	49.4%	50.4%	48.5%	52.5%	59.7%	59.5%	51.4%	9.5
Indiana	55.3%	50.8%	50.4%	46.0%	74.7%	63.0%	52.4%	7.7
Iowa	67.0%	58.5%	73.5%	69.5%	73.4%	55.5%	66.5%	4.0
Kansas	62.5%	56.8%	71.3%	66.6%	74.3%	80.0%	66.7%	5.3
Kentucky	88.3%	45.0%	62.7%	78.5%	67.5%	100.0%	71.2%	2.7
Louisiana	72.0%	65.5%	74.0%	71.3%	65.7%	56.7%	68.5%	5.7
Maine	NA	51.0%	NA	NA	NA	NA	51.0%	1.0
Maryland	60.3%	60.2%	58.4%	63.7%	63.5%	63.9%	61.5%	11.8
Massachusetts	65.7%	73.2%	72.5%	77.1%	70.8%	68.0%	71.0%	11.2
Michigan	63.0%	53.5%	40.5%	42.6%	56.0%	0.0%	50.4%	6.5
Minnesota	53.2%	54.8%	55.5%	60.2%	54.0%	52.4%	55.4%	10.2
Mississippi	81.0%	66.0%	74.0%	89.0%	64.0%	100.0%	78.3%	1.7
Missouri	63.4%	52.9%	58.6%	59.9%	80.0%	71.7%	61.3%	5.5
Montana	70.7%	76.3%	85.5%	79.0%	75.0%	63.0%	76.3%	4.8

	2011–2012	2012–2013	2013–2014	2014–2015	2015–2016	2016–2017	6-Year Average	Average No. of Schools
Nebraska	NA	NA	68.0%	60.0%	53.0%	60.0%	60.3%	1.5
Nevada	68.0%	90.0%	80.0%	76.0%	77.0%	75.0%	75.3%	5.8
New Hampshire	91.0%	91.0%	60.3%	85.5%	63.5%	72.5%	71.8%	2.0
New Jersey	61.0%	68.7%	66.0%	65.0%	85.0%	79.0%	71.2%	2.7
New Mexico	59.0%	65.0%	NA	NA	NA	NA	62.0%	1.0
New York	72.5%	70.3%	73.2%	72.6%	70.0%	75.3%	72.4%	23.3
North Carolina	74.8%	66.7%	60.3%	55.8%	50.3%	55.4%	61.3%	10.8
North Dakota	58.7%	53.3%	65.0%	56.7%	63.5%	60.0%	59.3%	2.3
Ohio	58.3%	57.1%	51.2%	48.5%	61.2%	62.4%	55.1%	13.2
Oklahoma	NA	86.0%	57.5%	NA	0.0%	64.0%	66.3%	1.3
Pennsylvania	74.3%	78.0%	72.0%	69.3%	82.5%	64.7%	72.6%	2.5
Rhode Island	87.0%	86.0%	71.0%	92.0%	73.0%	67.0%	78.1%	2.3
South Carolina	66.8%	63.4%	57.9%	64.6%	73.8%	53.2%	62.7%	5.8
South Dakota	67.0%	79.0%	71.0%	68.0%	58.0%	58.0%	66.8%	2.8
Tennessee	52.0%	52.3%	50.9%	47.4%	59.7%	64.2%	52.9%	12.0
Texas	55.3%	47.3%	50.1%	59.5%	62.6%	66.4%	56.2%	13.8
Utah	74.9%	84.0%	71.2%	74.6%	84.7%	79.0%	78.0%	9.7
Virginia	51.9%	54.1%	51.7%	61.2%	65.7%	62.0%	57.6%	12.0
Washington	70.5%	73.7%	76.0%	78.3%	67.0%	76.0%	73.5%	4.3
West Virginia	NA	NA	71.0%	NA	NA	NA	71.0%	1.0
Wisconsin	72.1%	68.9%	58.0%	62.1%	46.0%	68.3%	63.1%	9.0
Average	**64.1%**	**61.6%**	**60.7%**	**61.9%**	**66.2%**	**65.9%**	**63.0%**	**7.0**
Minimum	*46.2%*	*45.0%*	*40.5%*	*22.0%*	*46.0%*	*40.3%*	*22.0%*	*1.0*
Maximum	*91.0%*	*91.0%*	*85.5%*	*92.0%*	*95.5%*	*100.0%*	*100.0%*	*23.3*

Source: IPEDS School Sample. See Appendix B for details. NAs indicate a lack of data availability. Information was not available at the school level for Alaska, Hawaii, Oregon, Vermont, Wyoming or the District of Columbia.

Table A8: Percent of Cosmetology Students Who Graduated Within 24 Months, 2011–2012 to 2016–2017

	2011–2012	2012–2013	2013–2014	2014–2015	2015–2016	2016–2017	6-Year Average	Average No. of Schools
Alabama	100.0%	85.0%	60.5%	22.0%	71.0%	57.0%	68.4%	2.5
Arizona	53.0%	60.0%	48.8%	58.7%	60.7%	64.8%	57.1%	6.2
Arkansas	77.3%	61.8%	56.5%	68.3%	68.5%	64.3%	66.0%	4.5
California	67.4%	68.3%	74.8%	71.7%	69.6%	60.9%	69.0%	15.8
Colorado	49.2%	53.6%	53.9%	51.6%	46.7%	45.5%	51.4%	6.8
Connecticut	73.6%	74.7%	76.5%	76.7%	77.0%	87.2%	77.9%	4.7
Delaware	87.0%	66.0%	70.0%	NA	NA	NA	74.3%	3.8
Florida	69.5%	59.6%	62.8%	60.3%	66.9%	68.3%	63.8%	11.2
Georgia	81.0%	74.0%	77.2%	65.1%	56.7%	44.0%	65.3%	8.2
Idaho	84.7%	80.5%	75.0%	73.3%	95.5%	80.3%	80.4%	5.7
Illinois	53.2%	50.0%	48.8%	54.0%	59.7%	59.5%	52.5%	9.5
Indiana	60.3%	54.8%	50.8%	55.0%	74.7%	63.0%	56.5%	7.7
Iowa	67.0%	60.3%	73.5%	72.5%	73.4%	55.5%	67.3%	4.0
Kansas	65.0%	59.2%	71.3%	69.7%	74.3%	82.3%	68.6%	5.3
Kentucky	89.5%	53.3%	62.7%	94.0%	69.5%	100.0%	75.5%	2.7
Louisiana	74.2%	75.8%	74.0%	75.0%	65.7%	56.7%	71.6%	5.7
Maine	NA	51.0%	NA	NA	NA	NA	51.0%	1.0
Maryland	60.6%	60.2%	58.7%	66.3%	63.5%	63.9%	62.0%	11.8
Massachusetts	69.1%	75.5%	71.4%	79.2%	72.9%	68.0%	72.6%	11.2
Michigan	75.2%	64.5%	42.8%	48.0%	56.0%	0.0%	57.3%	6.5
Minnesota	55.7%	57.6%	56.2%	61.4%	54.3%	52.4%	56.9%	10.2
Mississippi	84.0%	68.0%	83.5%	89.0%	64.0%	100.0%	81.7%	1.7
Missouri	67.0%	59.1%	58.6%	61.3%	80.0%	71.7%	63.3%	5.5
Montana	73.7%	76.3%	85.5%	84.8%	75.0%	63.0%	78.0%	4.8

	2011–2012	2012–2013	2013–2014	2014–2015	2015–2016	2016–2017	6-Year Average	Average No. of Schools
Nebraska	NA	NA	68.0%	60.0%	53.0%	60.0%	60.3%	1.5
Nevada	69.0%	90.0%	80.0%	76.0%	81.0%	75.0%	76.1%	5.8
New Hampshire	91.0%	95.0%	53.0%	85.5%	63.5%	72.5%	71.8%	2.0
New Jersey	61.0%	71.0%	66.3%	65.0%	85.0%	79.0%	71.7%	2.7
New Mexico	59.0%	65.0%	NA	NA	NA	NA	62.0%	1.0
New York	74.1%	71.9%	72.5%	73.4%	70.3%	76.1%	73.1%	23.3
North Carolina	78.8%	74.8%	64.0%	54.8%	50.3%	60.4%	64.6%	10.8
North Dakota	59.7%	56.3%	65.0%	61.3%	63.5%	63.5%	61.3%	2.3
Ohio	64.6%	63.5%	51.2%	51.6%	61.2%	62.4%	58.2%	13.2
Oklahoma	NA	86.0%	57.5%	NA	0.0%	64.0%	66.3%	1.3
Pennsylvania	74.3%	78.0%	72.0%	69.3%	82.5%	64.7%	72.6%	2.5
Rhode Island	87.0%	86.0%	71.0%	92.0%	73.0%	67.0%	78.1%	2.3
South Carolina	67.4%	65.4%	57.9%	65.3%	74.8%	54.4%	63.7%	5.8
South Dakota	67.0%	80.0%	71.0%	71.0%	63.0%	74.0%	71.0%	2.8
Tennessee	63.0%	56.2%	54.3%	47.9%	59.7%	66.0%	56.1%	12.0
Texas	58.1%	52.3%	51.1%	61.8%	64.3%	67.7%	58.6%	13.8
Utah	80.1%	85.9%	71.2%	80.0%	85.4%	79.7%	80.9%	9.7
Virginia	55.2%	59.6%	52.0%	63.9%	71.9%	62.0%	60.7%	12.0
Washington	73.3%	75.3%	76.0%	79.7%	67.5%	76.0%	74.8%	4.3
West Virginia	NA	NA	71.0%	NA	NA	NA	71.0%	1.0
Wisconsin	72.7%	71.8%	58.7%	64.3%	46.0%	68.3%	64.4%	9.0
Average	**67.6%**	**65.2%**	**61.3%**	**64.1%**	**67.0%**	**66.6%**	**65.0%**	**7.0**
Minimum	*49.2%*	*50.0%*	*42.8%*	*22.0%*	*46.0%*	*44.0%*	*22.0%*	*1.0*
Maximum	*100.0%*	*95.0%*	*85.5%*	*94.0%*	*95.5%*	*100.0%*	*100.0%*	*23.3*

Source: IPEDS School Sample. See Appendix B for details. NAs indicate a lack of data availability. Information was not available at the school level for Alaska, Hawaii, Oregon, Vermont, Wyoming or the District of Columbia.

Appendix B: Methods

This report was guided by the broad question: What are the economics of the cosmetology occupation and the training cosmetologists complete?

For each part of the primary question, we analyzed a series of sub-questions. Those relevant to the economics of the cosmetology occupation included:

- What are the wages (including tips) of cosmetologists?
- How many hours per week do cosmetologists typically work?
- How many weeks per year do cosmetologists typically work?
- How many jobs do cosmetologists typically have?
- Do cosmetologists typically work part time or full time?

Questions specific to the economics of cosmetology training included:

- In what kind of setting do most cosmetologists complete their job training?
- What is the average program length, in credit hours, of cosmetology programs?
- How long does it take to complete a cosmetology program?
- What is the cost of attending a cosmetology school?
- What percentage of cosmetology students receive Pell Grants?
- How much financial aid do cosmetology students receive in the form of Pell Grant funds?
- What percentage of cosmetology students receive federal student loans?
- How much financial aid do cosmetology students receive in the form of federal student loans?
- What percentage of students complete their education within normal time?
- What percentage of students take 150% or 200% of normal time to complete their education?
- What is the relationship between program length and state licensing requirements?

Data Sources

To answer these questions, we used several sources of readily available public data. We drew cosmetology program, student financial aid and student program completion data from the Integrated Postsecondary Education Data System. IPEDS is an annual survey administered by the National Center for Education Statistics to collect data from every postsecondary academic, technical and vocational institution. This is in accordance with the Higher Education Act of 1965, which, among other things, requires any institution that participates in federal student aid programs to report data on topics such as graduation rates and student financial aid.[105] However, institutions that do not participate in federal student aid programs, but that want to be included on the Department of Education's College Navigator website, can voluntarily report data for IPEDS.[106]

The 2016 Adult Training and Education Survey provided cosmetologist demographic and employment data for this study. Fielded by the NCES in 2016, ATES collected responses from almost 50,000 individuals.[107] This survey uniquely focused on gathering data about nondegree credentials and work experiences and was sufficiently detailed to allow identification of cosmetologists among respondents.[108]

In addition to the IPEDS and ATES data, we used wage data for various occupations from the Bureau of Labor Statistics. We also used data on state cosmetology licensure requirements from the second edition of the Institute for Justice's report *License to Work*.[109]

All ATES data were collected in 2016 and represent a point-in-time portrait of respondents. Although IPEDS contains some data components dating back to the 1980s, the data of most interest and utility for this study were more recent. Specifically, we used IPEDS data for school years 2011–2012 through 2016–2017.

Sample

For this study's analyses, we used data samples specific to cosmetologists and cosmetology schools from our two main data sources. Details on specific samples, their limitations and uses are contained in Table B1.

Table B1: Samples by Data Source and Use

Source	Sample Size	Sample Detail
ATES	n=226	These cosmetologist data answer questions about cosmetology wages, average hours worked per week, weeks worked per year, number of jobs worked, age and level of education. The dataset covers individuals who reported both having a cosmetology credential and using that credential in their current job.
IPEDS Program Sample	2011–2012: n=1,159 2012–2013: n=1,205 2013–2014: n=1,201 2014–2015: n=1,201 2015–2016: n=1,057 2016–2017: n=1,025	These cosmetology school data answer questions about program credit hours, months to complete education and program costs. These data are reported at the program level for a school's largest program. For this reason, the dataset used in this study covers only those schools where the largest (or the only program) offered was a cosmetology program under Classification of Instructional Program code 12.0401.[110] Schools where cosmetology was a smaller program, as well as schools that did not report any data by program, are excluded.
IPEDS School Sample	2011–2012: n=312 2012–2013: n=347 2013–2014: n=339 2014–2015: n=313 2015–2016: n=227 2016–2017: n=202	These cosmetology school data answer questions about percent of students who received Pell Grants, average Pell Grant awards, percent of students who took out student loans, average student loans taken, and graduation rates within 100%, 150% and 200% of normal time.[111] These data are reported at the school level and represent averages across all a school's programs. For this reason, this dataset covers schools whose only program was cosmetology.

Variables

We used various variables from both ATES and IPEDS in our analyses. These variables, their definitions and a description of any ways they may have been filtered or transformed follow.

ATES

CNFIELD1 captured the certification that respondents reported as their most important. CNFIELD1 was equal to 13 if cosmetology was reported as the field of a respondent's most important certification. This variable was not transformed, but it was applied, in conjunction with CNCURRJOB1, to all other ATES data so that only responses from individuals who reported both having a cosmetology certification and using that certification in their current job were considered.

CNFIELD2 captured the certification that respondents reported as their second most important. CNFIELD2 was equal to 13 if cosmetology was reported as the field of a respondent's second most important certification. This variable was not transformed, but it was applied, in conjunction with CNCURRJOB2, to all other ATES data so that only responses from individuals who reported both having a cosmetology certification and using that certification in their current job were considered.

CNCURRJOB1 captured whether respondents' most important certification was for their current job. CNCURRJOB1 was equal to 3 if CNFIELD1 was a respondent's most important certification.

CNCURRJOB2 captured whether respondents' second most important certification was for their current job. CNCURRJOB2 was equal to 3 if CNFIELD2 was a respondent's most important certification.

EEEARN captured respondents' earnings over the 12 months preceding the survey. Values for this variable ranged from 1 to 9. Values 1 through 6 equated to $10,000 income bands (e.g., 1 = $0 to $10,000, 2 = $10,001 to $20,000), 7 equaled $60,001 to $75,000, 8 equaled $75,001 to $150,000, and 9 equaled $150,000 or more.

EEHRS captured the number of hours per week (1 through 80 hours) that respondents reported working.

EEWKS_TRANSFORMED was created from ATES' EEWKS variable, which recorded the number of weeks respondents worked in the 12 months preceding the survey. Original values of EEWKS ranged from 1 to 6 with 1 equaling 50 to 52 weeks of the year, 2 equaling 48 or 49 weeks, 3 equaling 40 to 47 weeks, 4 equaling 27 to 39 weeks, 5 equaling 14 to 26 weeks, and 6 equaling 13 weeks or fewer. To make this variable more intuitive (so that higher values equaled more weeks worked during the year), a new variable, EEWKS_TRANSFORMED, was created and the variable values were flipped. For example, in rows where EEWKS equaled 1, EEWKS_TRANSFORMED equaled 6.

EEJOB captured how many jobs respondents had in the week preceding the survey. Values for this variable ranged from 1 to 5 and represented the number of jobs reported (e.g., EEJOB = 1 if a respondent had one job, EEJOB = 2 if a respondent had 2 jobs).

In general, our analyses did not consider ATES survey responses marked as valid skips. The circumstances that would lead to a question in the survey being marked thusly vary but in general depend on the question being a valid one only for respondents who answered other survey questions affirmatively. For instance, a survey question asking about wages earned during the past 12 months would be valid only for respondents who reported working during the past 12 months.

IPEDS

FEEDBACK_AGG was created from IPEDS' DTA_FDBK_COMPR_GRP to capture the institutional type for each institution in our IPEDS data. DTA_FDBK_COMPR_GRP disaggregated institutions into over 200 classifications, far too many to be useful for analysis. FEEDBACK_AGG therefore aggregated these classifications into six categories. FEEDBACK_AGG has values of 1 = public degree-granting institution, 2 = public nondegree-granting institution, 3 = private, not-for-profit degree-granting institution, 4 = private, not-for-profit nondegree-granting institution, 5 = private, for-profit degree-granting institution and 6 = private, for-profit nondegree-granting institution. A small number of schools were excluded from FEEDBACK_AGG because descriptions of those schools' groupings in the original IPEDS variable were insufficiently detailed to allow those schools to be matched to categories in FEEDBACK_AGG with any precision. The excluded schools fell into DTA_FDBK_COMPR_GRP classifications 1, 177, 178, 179, 180, 181, 183, 186, 192, 193, 225, 226, 227, 239, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256 and 257.

IPEDS Program Sample

LGST_PROG_LNGTH_CRDTHRS measured program credit hours. It captured the length in months of the largest program. LGST_PROG_LNGTH_CRDTHRS measured the average number of months required for program completion.

TUITIONFEES_LGST_PROG measured tuition and fees at the program level. BOOKSSUPPLIES_LGST_PROG measured books and supply costs at the program level. COSTS was a created variable that summed the values of TUITIONFEES_LGST_PROG and BOOKSSUPPLIES_LGST_PROG.

IPEDS School Sample

PRCNTSTUD_AWRD_PELLGRNT captured the percentage of students attending a school who received Pell Grant funds.

AVRGSTUD_AWRD_PELLGRNT captured the average Pell Grant, in nominal dollars, received by students.

PRCNTSTUD_AWRD_STUDLN captured the percentage of students attending a school who received federal student loans.

AVRGSTUD_AWRD_STUDLN captured the average student loan amount, in nominal dollars, received by students.

RATECMPLT_100PRCNT captured the percentage of students attending a school who completed their education within normal time.

RATECMPLT_150PRCNT captured the percentage of students attending a school who completed their education within 150% of normal time.

RATECMPLT_200PRCNT captured the percentage of students attending a school who completed their education within 200% of normal time.

Analysis

We used descriptive statistics to analyze the IPEDS and ATES data. We analyzed these data both discretely and together with data drawn from other sources. We answered most questions solely using our two main data sources. However, to answer the question "What is the relationship between program length and state licensing requirements?" it was necessary to compare the median institutional program credit hours by state with some measure of educational hours required by states for licensure. The data for that comparison came from the list of licensure requirements in the second edition of the Institute for Justice's report *License to Work*.

Finally, the data used in this study have some limitations. Most of these limitations are intrinsic to the data samples and are noted in Table B1. However, as shown in Table B2, the descriptive statistics for schools reasonably approximate the descriptive statistics for programs. This suggests that the school sample findings are indicative of program sample characteristics.

Table B2: Comparison of IPEDS Program and School Samples on Key Metrics, 6-Year Averages, 2011–2012 to 2016–2017

	No. of Programs/ Schools in Sample	Median Credit Hours	Median Credit Months	Average Cost Per School	Percent of Students Per Program/ School with Pell Grants	Average Pell Grant Award	Percent of Students Per Program/ School with Federal Student Loans	Average Federal Student Loan	Percent of Students Per Program/ School Graduated On Time	Percent of Students Per Program/ School Graduated Within 18 Months	Percent of Students Per Program/ School Graduated Within 24 Months
Program Sample	6,848	1500	12	$16,104	61.0%	$4,000	55.2%	$6,677	31.1%	66.4%	68.4%
School Sample	1,740	1500	12	$16,472	65.4%	$4,100	63.1%	$7,368	27.2%	63.0%	65.0%

Note: The column "Number of Programs/Schools in Sample" sums programs/schools per year.

There are two additional limitations. First, institutions in IPEDS report average student charges either at the school level or by program. Most public institutions report student charges at the school level, making it impossible to determine costs for cosmetology students specifically. We therefore could not include data from such institutions in our calculation of aggregate program costs.

And second, aggregate total student program costs reported here likely underestimate the actual total costs that cosmetology students incur. IPEDS does not collect data on room and board costs. Thus, only the costs for the four categories of expenses that IPEDS does collect (i.e., tuition, fees, books and supplies) are reported here.

Endnotes

1 Civil Rights Complaint for Declaratory and Injunctive Relief, *Ziemer v. Minn. Bd. of Cosmetologist Exam'rs*, Case No. 62-CV-19-7607 (Minn. Dist. Ct. Oct. 22, 2019).

2 *Id.* Effective March 2, 2020, the board repealed the salon manager requirement for all licensees through rulemaking. 44 Minn. Reg. 941 (Feb. 24, 2020).

3 The other states are Delaware, Kansas, Massachusetts, Michigan, Mississippi, Missouri, North Dakota and Rhode Island. Carpenter, D. M., Knepper, L., Sweetland, K., & McDonald, J. (2017). *License to work: A national study of burdens from occupational licensing* (2nd ed.) Arlington, VA: Institute for Justice. http://ij.org/report/license-work-2/. See also Sullivan, A. (2020, June 22). Why do licensed shampooers in Iowa undergo more training than police officers? *The Gazette*. https://www.thegazette.com/subject/opinion/staff-columnist/iowa-occupational-professional-licensing-universal-recognition-reform-police-20200622

4 At press time, the other states were Hawaii, New Mexico, North Dakota, Rhode Island and Wisconsin, though Wisconsin legislators were considering bills to exempt braiders. Institute for Justice. (n.d., b). *Braiding freedom*. http://braidingfreedom.com/; Carpenter et al., 2017. See also Green, A. (2016, Aug. 2). Braiding without a license. *The Atlantic*. https://www.theatlantic.com/business/archive/2016/08/hair-braider/494084/; AB 121, 105th Leg., Gen. Sess. (Wis. 2021); SB 261, 105th Leg., Gen. Sess. (Wis. 2021).

5 Twenty states and the District of Columbia permit an apprenticeship alternative to schooling. However, not every salon offers a state-approved apprenticeship program, so finding an apprenticeship can be difficult. CPT Guru. (2019, Nov. 23). Should you do a cosmetology apprenticeship instead of going to beauty school? [Blog post]. https://cosmetologypracticetest.guru/blog/cosmetology-apprenticeship-or-beauty-school/. Anecdotally, it seems very few take the apprenticeship route, leaving cosmetology school as the main path to licensure. For more on apprenticeships as an alternative to schooling, see Beauty Schools Directory. (n.d., a). *Cosmetology apprenticeship: An alternative to traditional beauty school*. https://www.beautyschoolsdirectory.com/programs/cosmetology-school/apprenticeships; Cosmetology-License.com. (n.d.). *How to decide if a cosmetology apprenticeship is right for you*. https://www.cosmetology-license.com/cosmetology-apprenticeships/

6 Pethokoukis, J. (2014, Apr. 21). The terrible economic burden of occupational licensing. [Blog post]. https://www.aei.org/publication/the-terrible-economic-burden-of-occupational-licensing; Carpenter, D. M. (2018, Aug. 13). You'll need a license for that job. *Summer 2018 Insider*. Washington, DC: The Heritage Foundation. https://www.heritage.org/insider/summer-2018-insider/youll-need-license-job; Kearney, M. S., Hershbein, B., & Boddy, D. (2015, Jan. 28). Nearly 30 percent of workers in the U.S. need a license to perform their job: It is time to examine occupational licensing practices [Blog post]. http://www.hamiltonproject.org/blog/nearly_30_percent_of_workers_in_the_u.s._need_a_license_to_perform_the; Trump, D. J. (2019, June 13). *Remarks by President Trump in working lunch with governors on workforce freedom and mobility*. https://trumpwhitehouse.archives.gov/briefings-statements/remarks-president-trump-working-lunch-governors-workforce-freedom-mobility/; Department of the Treasury Office of Economic Policy, Council of Economic Advisers, & Department of Labor. (2015). *Occupational licensing: A framework for policymakers*. Washington, DC: White House. https://obamawhitehouse.archives.gov/sites/default/files/docs/licensing_report_final_nonembargo.pdf

7 See, e.g., Kleiner, M. M., & Vorotnikov, E. S. (2018). *At what cost? State and national estimates of the economic costs of occupational licensing*. Arlington, VA: Institute for Justice. https://ij.org/report/at-what-cost; Kleiner, M. M., & Vorotnikov, E. (2017). Analyzing occupational licensing among the states. *Journal of Regulatory Economics, 52*, 132–158; Kleiner, M. M., & Krueger, A. B. (2013). Analyzing the extent and influence of occupational licensing on the labor market. *Journal of Labor Economics, 31*(S1, pt. 2), S173–S202; Kleiner, M. M., & Krueger, A. B. (2010). The prevalence and effects of occupational licensing. *British Journal of Industrial Relations, 48*(4), 676–687.

8 See, e.g., Ross, J. (2017). *The inverted pyramid: 10 less restrictive alternatives to occupational licensing*. Arlington, VA: Institute for Justice. https://ij.org/report/the-inverted-pyramid/; Hemphill, T. A., & Carpenter, D. M. (2016). Occupations: A hierarchy of regulatory options. *Regulation, 39*(3), 20–24. https://object.cato.org/sites/cato.org/files/serials/files/regulation/2016/9/regulation-v39n3-5_0.pdf; Little Hoover Commission. (2016). *Jobs for Californians: Strategies to ease occupational licensing barriers* (Report #234). Sacramento, CA. http://www.lhc.ca.gov/sites/lhc.ca.gov/files/Reports/234/Report234.pdf; Kleiner, M. M. (2015). *Reforming occupational licensing policies* (Discussion Paper 2015-01). Washington, DC: The Hamilton Project, Brookings Institution. https://www.brookings.edu/wp-content/uploads/2016/06/THP_KleinerDiscPaper_final.pdf; Carpenter, D. M., & McGrath, L. (2014). *The balance between public protection and the right to earn a living* [Resource brief]. Lexington, KY: Council on Licensure, Enforcement and Regulation. https://ij.org/report/the-balance-between-public-protection-and-the-right-to-earn-a-living/

9 U.S. Bureau of Labor Statistics (2020e, Sept. 1). *Occupational outlook handbook: Barbers, hairstylists, and cosmetologists*. https://www.bls.gov/ooh/personal-care-and-service/barbers-hairstylists-and-cosmetologists.htm

10 Carpenter et al., 2017.

11 Carpenter et al., 2017.

12 Carpenter et al., 2017.

13 Like cosmetologists, EMTs are licensed in every state and the District of Columbia. Accordingly, EMT ranks as the 15th most widely and onerously licensed occupation. Carpenter et al., 2017.

14 Ala. Admin. Code r. 420-3-23.01 to -23.18; County of Los Angeles Public Health, *Body Art*, http://publichealth.lacounty.gov/eh/AreasofInterest/body-art.htm (July 11, 2014); Florida Health, Tattoo Artist Licensure, http://www.floridahealth.gov/environmental-health/tattooing/tattoo-artist.html (last modified Feb. 8, 2021).

15 Greenberg, D. (2021). Regulating glamour: A quantitative analysis of the health and safety training of appearance professionals. *UIC John Marshall Law Review*, *54*(1), 2.

16 Simpson, K. M., Hendrickson, C., Dwayne Norris, C. D., Vander Molen, R. J., Vestal, D., Kavanagh, K., Lilly, S., Rege, G. & Smith, D. (2016). *Examination of cosmetology licensing issues*. Washington, DC: American Institutes for Research. The report notes that it can be difficult to compare curriculum topics, as health and safety may be taught in conjunction with techniques such as cutting and styling. Furthermore, if there is a justification for the overall number of hours required for a license, it is not well known. In a national survey of cosmetology state board administrators conducted as part of the PBA-commissioned report, a majority were unable to answer the question, "How was the number of curriculum hours decided upon for your state?" At just 14 respondents total, the sample size was very small, however. Simpson et al., 2016.

17 Massachusetts also requires 1,000 clock hours of education. However, it also requires two years of experience, for a total of about 963 days—or close to three years—lost to education and experience. Carpenter et al., 2017.

18 A previous IJ study reports Oregon's required hours for cosmetology licensure as 1,700. Carpenter et al., 2017. However, that study was looking at requirements for Oregon's hair design license only. In practice, it appears aspiring cosmetologists in the state typically complete the requirements for licensure in three fields: hair design, nail technology and esthetics. In other states, part or all of those fields typically fall under cosmetology licensure. See Beauty Schools Directory. (n.d., b). *Oregon license requirements*. https://www.beautyschoolsdirectory.com/faq/license-requirements/oregon

19 H.B. 238, 60th Leg., Gen. Sess. (Utah 2013); W. Va. Code R. §§ 3-1-1 to 3-1-12 (2013) and H.B. 2777, 82d Leg., Gen. Sess. (W. Va. 2015); S.B. 395, 101st Leg., Reg. Sess. (Wis. 2013); A.B. 246, 78th Leg., Reg. Sess. (Nev. 2015) and 218 Nev. Reg. Admin Regs. R064-15A (Dec. 21, 2015); S.B. 1324, 64th Leg., Reg. Sess. (Idaho 2018); 2018 Neb. Laws L.B. 731.

20 Hair Council. (n.d., a). *About the Hair Council*. https://www.haircouncil.org.uk/pages/about.html; Conway, L. (2019). *Regulation of hairdressers* (Briefing Paper No. 8592). House of Commons Library, UK Parliament. https://commonslibrary.parliament.uk/research-briefings/cbp-8592/

21 See the EU Single Market regulated professions database: https://ec.europa.eu/growth/tools-databases/regprof/index.cfm?action=profession&id_profession=12019&tab=countries&quid=2&mode=asc&pagenum=1&maxrows=15#top

22 Hair Council, n.d., a; Conway, 2019. The Hair and Barber Council, which administers the voluntary certification, would like to see it become mandatory; however, its campaign for licensure has so far been unsuccessful. See Hair Council, n.d., a; Conway, 2019; Timmons, E. (2019, Mar. 30). Texas barbers and cosmetologists do not need to spend time and money on state licensing. *The Dallas Morning News*. https://www.dallasnews.com/opinion/commentary/2019/03/30/texas-barbers-and-cosmetologists-do-not-need-to-spend-time-and-money-on-state-licensing/

23 Hair Council, n.d., a; Conway, 2019; Hair Council. (n.d., b). *Hairdressing training and education*. https://www.haircouncil.org.uk/about-us/training/

24 Hair Council, n.d., b.

25 This is sometimes a matter of statute and other times one of board interpretation.

26 Ten states specifically exempt threading from the practice of cosmetology: Ariz. Rev. Stat. § 32-506(11); Cal. Bus. & Prof. § 7316(d)(3); Ind. Code § 25-8-2-9.5(c)(1); Me. Stat. tit. 32, § 14203(1-A)(B); Minn. Stat § 155A.27(9)(b); Miss. Code § 73-7-2(b); Nev. Rev. Stat § 644A.030(2); N.D. Cent. Code § 43-11-01(4)(b); Tex. Occ. Code § 1602.0025; Wis. Stat. § 454.04(1m). Colorado does not specifically include threading in its definition of cosmetology, *see* Colo Rev. Stat. § 12-8-103(9), and in an earlier position statement affirmed that threading "is not the Practice of Cosmetology." Office of Barber and Cosmetology Licensure, Division of Registrations, Director's Position Statement #3: Threading Service is not the Practice of Cosmetology (Apr. 12, 2010), *available at* https://web.archive.org/web/20110725074830/http://www.dora.state.co.us/barbers_cosmetologists/rules/ThreadingPositionStatement3.pdf. While Louisiana specifically includes threading within the definition of esthetics, La. Rev. Stat. § 37-563(6), the State Board of Cosmetology issues a separate Threading Permit that requires payment of $50 and passing a 15-question examination. Louisiana Board of Cosmetology, Threading Application, http://www.lsbc.louisiana.gov/pdfs/threading.pdf

27 Both must complete a short course on infection control and applicable law. S.B. 1401, 54th Leg., 1st Reg. Sess. (Ariz. 2019).

28 S.B. 1320, 52d Leg., 1st Reg. Sess. (Ariz. 2015). See also Winer, M. (2015, June 30). Arizona makeup artists no longer need cosmetology license. *Azcentral.com*. https://www.azcentral.com/story/news/arizona/politics/2015/06/30/arizona-makeup-artists-license/29546205/

29 2021 Ark. Acts 957.

30 SF 2898, 91st Leg., Reg. Sess. (Minn. 2020).

31 H.B. 1312, 2021 Leg., Reg. Sess. (Miss. 2021).

32 2017 Tenn. Pub. Acts 227. Tennessee previously had a specialty license for shampooers.

33 Both must complete a short course on hair safety. S.B. 87, 64th Leg., Gen. Sess. (Utah 2021).

34 HB 790, 2018 Reg. Sess. (Va. 2018).

35 2005 Va. Acts 829.

36 2020 W. Va. Acts 245.

37 See Institute for Justice, n.d., b. See also Institute for Justice. (n.d., a) *Braider freedom act* [Model legislation]. https://ij.org/activism/legislation/model-legislation/model-braiding-law/ and Avelar, P., & Sibilla, N. (2014). *Untangling regulations: Natural hair braiders fight against irrational licensing*. Arlington, VA: Institute for Justice. https://ij.org/report/untangling-regulations/. At press time, Wisconsin legislators were considering bills to exempt braiders. AB 121, 105th Leg., Gen. Sess. (Wis. 2021); SB 261, 105th Leg., Gen. Sess. (Wis. 2021).

38 H 1941, 2003 Reg. Sess. (Va. 2003). Virginia's braiding license required 170 hours of education. On a showing of competence, this could be reduced to 40 hours. 18 Va. Admin. Code § 41-30-190.

39 The state repealed its hair braiding license on the recommendation of the Commission on Government Reform and Restructuring. Governor McDonnell's Commission on Government Reform and Restructuring, Report to the Governor 16 (2011); S. J. Res. 66, 2012 Reg. Sess. (Va. 2012); H 1291, 2012 Reg. Sess. (Va. 2012).

40 CS/HB 1193, 2020 Leg., Reg. Sess. (Fla. 2020). See also Office of Governor Ron DeSantis. (2020, June 30). Governor Ron DeSantis signs "The Occupational Freedom and Opportunity Act" to remove unnecessary barriers to unemployment [News release]. Tallahassee, FL. https://www.flgov.com/2020/06/30/governor-ron-desantis-signs-the-occupational-freedom-and-opportunity-act-to-remove-unnecessary-barriers-to-employment/ and Wimer, A. (2020, June 30). Governor signs bill making it easier for Floridians to work [Press release] Arlington, VA: Institute for Justice. https://ij.org/press-release/governor-signs-bill-making-it-easier-for-floridians-to-work/

41 Minnesota Board of Cosmetology. (n.d.). *Makeup services in Minnesota* [Infographic]. https://web.archive.org/web/20200516113702/https://mn.gov/boards/assets/Makeup%20Services%20Infographic_tcm21-363163.pdf

42 *Ziemer* Complaint, *supra* note 1.

43 See Carpenter et al., 2017.

44 Complaint, *Waugh v. Nev. State Bd. of Cosmetology*, Case No. 2:12-cv-01039 (June 19, 2012), ECF No. 1; Complaint, *Bukvic-Bhayani v. Mitchell*, Case No. 3:17-cv-00508 (Aug. 23, 2017), ECF No. 1; Petition, *Patel v. Tex. Dep't of Licensing & Regul.*, 469 S.W.3d 69 (Tex. 2015) (Dec. 8, 2009); Petition, *Chudasama v. La. State Bd. of Cosmetology*, Case No. 650,359, Section 24 (La. 19th Jud. Dist. Ct. Aug. 2, 2016); *Hearings before the Committee on Consumer Affairs*, 92nd Leg., Reg. Sess. 8 (Wis. 1998) (statement of Taalib-Din Abdul Uqdah); Avelar and Sibilla, 2014.

45 One exception is a study that estimated the impact of for-profit college attendance on employment rates and earnings. Cellini, S. R., & Turner, N. (2019). Gainfully employed? Assessing the employment and earnings of for-profit college students using administrative data. *Journal of Human Resources*, *54*(2), 342–370. That study found that for-profit cosmetology programs generated higher returns relative to their public-sector counterparts. The authors speculate this may be because "several for-profit schools are directly linked to high-end salons and enjoy name-brand recognition." Cellini and Turner, 2019, p. 359. They also note that *total* returns for for-profit cosmetology schools were *negative*. This may be because so many students drop out, leading to a negative earnings effect that negates the wage premium enjoyed by students who graduate. See Lam, B. (2016, June 1). Most for-profit students wind up worse off than if they had never enrolled in the first place. *The Atlantic*. https://www.theatlantic.com/business/archive/2016/06/for-profit-earnings/485141/. Another exception is Simpson et al., 2016. That report, commissioned by a beauty industry trade group, attempts to identify correlations between curriculum hours mandated by state law and various educational, employment and public safety outcomes. However, it contains several notable limitations. All analyses are correlational, and none control for variables that could influence the relationship between curriculum hours and outcomes. Several analyses examine only 11 states "of particular interest" without further explanation. And many analyses use a sample of schools from an accrediting organization, the National Accrediting Commission of Career Arts and Sciences, that includes non-cosmetology programs, such as barbering, esthetics, manicuring, massage therapy and cosmetology instruction—all of which have vastly different state-mandated curriculum hours.

46 McPhee, C., Jackson, M., Bielick, S., Masterton, M., Battle, D., McQuiggan, M., Payri, M., Cox, C., & Medway, R. (2018). *National Household Education Surveys Program of 2016: Data file user's manual* (NCES 2018-100). Washington, DC: National Center for Education Statistics, Institute of Education Sciences, U.S. Department of Education.

47 Institute of Education Sciences, National Center for Education Statistics. (n.d., a). *About IPEDS*. Washington, DC. https://nces.ed.gov/ipeds/about-ipeds

48 To be eligible for Title IV funds, a school must (1) offer at least one program "leading to a degree or preparing a student for gainful employment in a recognized occupation," (2) be "licensed or otherwise legally authorized to operate in the state in which it is physically located," (3) be "accredited or preaccredited by an agency recognized for that purpose by the Department of Education," and (4) "certified by ED as eligible to participate in Title IV programs." Hegji, A. (2019). *Institutional eligibility for participation in Title IV student financial aid programs* (CRS Report No. R43159). Congressional Research Service. https://crsreports.congress.gov/product/pdf/R/R43159, summary and p. 3.

49 The number of data points varies by year for several reasons; for example, in a given year, some schools may close and stop reporting information to the federal government. Others may opt out of Title IV funding, even though they remain open, and therefore stop reporting. And still others may become newly eligible for Title IV funding.

50 Limiting the data to schools where cosmetology is the largest program omits the experiences of students at schools where cosmetology is a smaller program.

51 We compared programs and schools across all metrics and found them to be similar. For example, median credit hours and median credit months were identical. Slightly more students per school received Pell Grants and borrowed student loans than per program, and those Pell Grants and loans were slightly larger by school than by program. Graduation rates differed by no more than four percentage points. See Appendix B.

52 Not covered at all are non-Title IV schools. And not covered for the purposes of questions pertaining to graduation rates or financial aid are Title IV schools that offer programs in addition to cosmetology. Those data are reported at the school level, making it impossible to know the graduate rates or financial aid statistics for cosmetology students specifically where a school has programs other than cosmetology.

53 In the program-level dataset, over 90% of schools were private, for-profit schools during the study period. Specifically, almost 98% were private, for-profit nondegree-granting institutions, while less than half a percent were private, for-profit degree-granting institutions. The remaining schools fell into the following four categories: (1) public degree-granting institutions, (2) public nondegree-granting institutions, (3) private, not-for-profit degree-granting institutions and (4) private, not-for-profit nondegree-granting institutions. This is similar to the results of another study, which found that a majority of cosmetology students are educated in a private, for-profit Title IV setting. Cellini, S. R., & Goldin, C. (2014). Does federal student aid raise tuition? New evidence on for-profit colleges. *American Economic Journal, 6*(4), 174–206.

54 This is referred to as "normal time" in IPEDS. Normal time is defined as the length of time a full-time student would take to graduate. See Appendix B for more details.

55 Carpenter et al., 2017.

56 Federal Student Aid. (n.d.). *Federal Pell Grants are usually awarded only to undergraduate students*. https://studentaid.gov/understand-aid/types/grants/pell/

57 Federal Student Aid, n.d.

58 A report commissioned by a beauty industry trade group reports higher graduation rates for NACCAS-accredited schools, ranging from 55% to 86% by state for the 2012–2013 school year. Simpson et al., 2016. However, as noted above, the NACCAS sample includes non-cosmetology programs. More important, the report counts as graduates students scheduled to graduate in 2013 who actually graduated as late as November 30, 2014, thus including students who graduated as many as 18 months late. Given the average program length of 12 months, a student graduating 18 months late could have taken up to 30 months to complete cosmetology school.

59 Avenue Five Institute. (2014, Mar. 24). What you should know about cosmetology school enrollment agreement [Blog post]. https://www.avenuefive.edu/what-you-should-know-about-cosmetology-school-enrollment-agreement/; Ramig, A. (2020, June 19). 8 things I wish I knew before I went to cosmetology school. *Medium*. https://medium.com/@alinaramig/8-things-i-wish-i-knew-before-i-went-to-cosmetology-school-4d9695759815

60 Petition, *State v. La' James College of Hairstyling, Inc.*, Equity No. EQCE077018 (Iowa Dist. Ct. Aug. 28, 2015).

61 *Id.*

62 Iowa Admin. Code r. 645-61.14 (2009).

63 Florida (1,200 hours), New Jersey (1,200 hours), New York (1,000 hours) and Pennsylvania (1,250 hours) all require less time in cosmetology school for licensure. So does Massachusetts (1,000 hours), though it also requires two years of experience. Carpenter et al., 2017.

64 Kolodner, M., & Butrymowicz, S. (2018, Dec. 26). A $21,000 cosmetology school debt, and a $9-an-hour job. *The New York Times*. https://www.nytimes.com/2018/12/26/business/cosmetology-school-debt-iowa.html

65 Kolodner and Butrymowicz, 2018.

66 U.S. Bureau of Labor Statistics. (2020c, July 6). *Occupational employment and wages, May 2019: 39-5012 hairdressers, hairstylists, and cosmetologists*. https://www.bls.gov/oes/current/oes395012.htm. Other research has found that graduates of only six of 671 cosmetology programs earn more than $20,000 a year on average. For 60% of programs, average graduate earnings were between $10,000 and $15,000. Graduates of one typical school earned just $12,487 on average but had $10,702 in student loans. Wessel, D. (2015, June 25). How to find out how much graduates of that cosmetology program actually make [Blog post]. https://www.brookings.edu/blog/up-front/2015/06/25/how-to-find-out-what-graduates-of-that-cosmetology-program-actually-make/. See also *Reauthorizing the Higher Education Act: Strengthening Accountability to Protect Students and Taxpayers*: Hearing Before the S. Comm. on Health, Educ., Labor and Pensions, 116th Cong. (Apr. 10, 2019) (statement of Adam Looney).

67 U.S. Bureau of Labor Statistics. (2020a, July 6). *Occupational employment and wages, May 2019: 35-2014 cooks, restaurant*. https://www.bls.gov/oes/current/oes352014.htm

68 U.S. Bureau of Labor Statistics. (2020b, July 6). *Occupational employment and wages, May 2019: 39-2011 janitors and cleaners*. https://www.bls.gov/oes/current/oes372011.htm

69 U.S. Bureau of Labor Statistics. (2020d, July 6). *Occupational employment and wages, May 2019: 39-6012 concierges*. https://www.bls.gov/oes/current/oes396012.htm

70 Several municipalities do require at least one person on site at a restaurant to possess a food handling permit, but these requirements can be satisfied in a few hours, often online, at very low cost. Moreover, they are specifically targeted to food safety. See, e.g., Krook, D. (n.d.). How to get (and keep) a food handlers permit [Blog post]. https://www.touchbistro.com/blog/how-to-get-and-keep-a-food-handlers-permit/ and WebrestaurantStore. (2019, Apr. 7). *Food handling certification: How to obtain a food handling certificate*. https://www.webstaurantstore.com/article/126/food-handling-certification-how-to-obtain-a-food-handling-certificate.html

71 Looney, A. (2020, Nov. 10). *Dept. of Education's College Scorecard shows where student loans pay off… and where they don't.* Washington, DC: Brookings Institution. https://www.brookings.edu/research/ed-depts-college-scorecard-shows-where-student-loans-pay-off-and-where-they-dont/

72 U.S. Bureau of Labor Statistics. (n.d.). *Real median personal income in the United States* (MEPAINUSA672N). Retrieved from FRED, Federal Reserve Bank of St. Louis. https://fred.stlouisfed.org/series/MEPAINUSA672N

73 U.S. Bureau of Labor Statistics, 2020c.

74 U.S. Department of Labor. (2021). *Tips*. https://www.dol.gov/general/topic/wages/wagestips

75 Covert, B. (2015, June 3). Why your beauty salon likely doesn't have any employees. *ThinkProgress*. https://archive.thinkprogress.org/why-your-beauty-salon-likely-doesnt-have-any-employees-dcb01d801bc4/

76 U.S. Bureau of Labor Statistics. (2018, July 19). 4.9 percent of workers held more than one job at the same time in 2017. *Ted: The Economics Daily*. https://www.bls.gov/opub/ted/2018/4-point-9-percent-of-workers-held-more-than-one-job-at-the-same-time-in-2017.htm

77 See, e.g., Avenue Five Institute. (2015, Apr. 30). Cosmetologist demand is projected to grow 13 percent from now until 2022 [Blog post]. https://www.avenuefive.edu/cosmetologist-demand-is-projected-to-grow-13-percent-from-now-until-2022/; Academy of Hair Design. (n.d.). *Top 10 reasons to enter the beauty business*. https://www.ahdvegas.com/top-10-reasons; State College of Beauty Culture. (n.d.). *Business expected to continue booming in the beauty industry*. https://www.statecollegeofbeauty.com/business-expected-to-continue-booming-in-the-beauty-industry

78 Bevill State Community College. (n.d.). *Salon & spa management*. https://www.bscc.edu/programs/career-tech/salon-spa-management

79 Aveda Institute Las Vegas. (2019, Oct. 30). *Top 5 reasons to become a cosmetologist*. https://avedalasvegas.com/2019/10/30/top-5-reasons-to-become-a-cosmetologist/

80 Email from Pamella Loyola to Iowa Attorney General (Online Consumer Complaint Form) (June 30, 2016, 5:08 CST) (on file with authors).

81 IPEDS does not contain data on Alaska cosmetology schools for any of the school years in our study period.

82 Since 2016, which falls during the study period, Ohio has had both a cosmetology license and an advanced cosmetology license (both reported in IPEDS under the same code). The standard cosmetology license requires 1,500 hours of education (Ohio Rev. Code § 4713.28), while the advanced license requires an additional 300 hours of education for a total of 1,800 hours (Ohio Rev. Code § 4713.30).

83 As explained above, aspiring cosmetologists in Oregon typically complete the requirements for licensure in hair design, nail technology and esthetics, part or all of which typically fall under cosmetology licensure in other states. All of the Oregon cosmetology programs in the IPEDS data fulfill the requirements for licensure in all three of those fields. During the 2016–2017 school year, all but one of the Oregon schools required 2,300 hours of training, consistent with the state-required hours for licensure in the three fields. The remaining school required only 1,150 hours for its competency-based program, which the Higher Education Coordinating Commission has approved as equivalent to the other schools' longer fixed-hour programs. Or. Admin. R. 715-045-0220 (2019). Because the school's program is equivalent to the other schools' longer programs, it is counted in the column for programs where credit hours equal required hours for licensure.

84 Wisconsin schools appear to be in the process of adjusting to lower licensure requirements. The percentage of schools requiring 1,550 hours is likely to have increased in the school years after the study period.

85 Carpenter et al., 2017.

86 Avalon School of Cosmetology. (n.d.). *Cosmetology 2100 course*. https://www.avaloncosmetologyschool.com/cosmetology2100.html; Carpenter et al., 2017.

87 S.B. 395, 101st Leg., Reg. Sess. (Wis. 2013).

88 715B Wis. Admin. Reg. CR 15-020 (July 27, 2015).

89 U.S. Department of Transportation, National Highway Traffic Safety Administration. (1996). *Emergency medical technician-basic: National standard curriculum*. https://www.ems.gov/pdf/education/Emergency-Medical-Technician/EMT_Basic_1996.pdf; Carpenter et al., 2017.

90 *See supra* note 14.

91 Cellini and Goldin, 2014.

92 Cellini, S. R. (2010). Financial aid and for-profit colleges: Does aid encourage entry? *Journal of Policy Analysis and Management, 29*(3), 526–552.

93 Mellor, W., & Carpenter, D. M. (2016). *Bottleneckers: Gaming the government for power and private profit*. New York, NY: Encounter Books; Kleiner and Vorotnikov, 2018. For an example of cosmetology licensing board "capture" by occupational insiders, see Editorial board. (2013, June 2). Salon laws and rules need scrutiny [Editorial]. *Des Moines Register*. https://www.pulitzer.org/files/2014/editorial-writing/dominick/06dominick2014.pdf

94 Pethokoukis, 2014; The Heritage Foundation, 2018; Kearney et al., 2015; Trump, 2019; Department of the Treasury Office of Economic Policy et al., 2015; Little Hoover Commission, 2016; Kleiner, 2015; National Conference of State Legislatures, National Governors Association, & The Council of State Governments. (2020). *Occupational licensing final report: Assessing state policies and practices: Project overview and lessons learned from the Occupational Licensing Learning Consortium*. Washington, DC: National Conference of State Legislatures. https://www.ncsl.org/research/labor-and-employment/occupational-licensing-final-report-assessing-state-policies-and-practices637425196.aspx; Ross, 2017; Hemphill and Carpenter, 2016; Carpenter and McGrath, 2014.

95 Farronato, C., Fradkin, A., Larsen, B., & Brynjolfsson, E. (2020). *Consumer protection in an online world: An analysis of occupational licensing* (NBER Working Paper 26601). Cambridge, MA: National Bureau of Economic Research.

96 Kleiner and Vorotnikov, 2018, 2017; Kleiner and Krueger, 2013, 2010.

97 Department of the Treasury Office of Economic Policy et al., 2015. See also National Conference of State Legislatures, 2020; Schmitt, K. (2018). *Questions a legislator should ask* (3rd ed). Nicholasville, KY: Council on Licensure, Enforcement and Regulation; Ross, 2017; Hemphill and Carpenter, 2016; Little Hoover Commission, 2016; Kleiner, 2015; Carpenter and McGrath, 2014.

98 See, generally, Schmitt, 2018. This book provides a framework for examining licensing policy.

99 Farr, M. K. (2021, Mar. 1). Investor Michael Farr: Inflation worries are rising, but there may be a happily ever after for markets in sight. *CNBC*. https://www.cnbc.com/2021/03/01/investor-michael-farr-inflation-worries-are-rising-but-there-may-be-a-happily-ever-after-for-markets-in-sight.html

100 Decker, M. (2020, Aug. 11). Demand for at-home haircuts has gone up 600% since lockdown. *Refinery29*. https://www.refinery29.com/en-us/2020/08/9952812/book-haircut-at-home-shortcut-app

101 SF 691, 92d Leg., Reg. Sess. (Minn. 2021). In 2020, the Tennessee General Assembly considered but ultimately failed to pass a bill that would have allowed people to work in a variety of occupations, including cosmetology, without a license provided customers acknowledged service providers were unlicensed and waived claims against them. HB 1945, 111th Leg., Reg. Sess. (Tenn. 2020).

102 Hair Council, n.d., a, b; Conway, 2019.

103 Hair Council, n.d., a.

104 SF 691, 92d Leg., Reg. Sess. (Minn. 2021). The House version—HF 554—was not amended. HF 554, 92d Leg., Reg. Sess. (Minn. 2021).

105 U.S. Department of Education, National Center for Education Statistics. (n.d.). *IPEDS 2021–21 data collection system: Purpose and uses of survey data.* https://surveys.nces.ed.gov/ipeds/public/purposes-of-survey-data

106 Institute of Education Sciences, National Center for Education Statistics. (n.d., d). *IPEDS survey methodology.* https://nces.ed.gov/ipeds/ReportYourData/IpedsSurveyMethodology

107 National Household Education Surveys Program. (n.d.). *Sample and methods: Adult Training and Education Survey (ATES)* [Infographic]. https://nces.ed.gov/nhes/pdf/ates_infographic.pdf

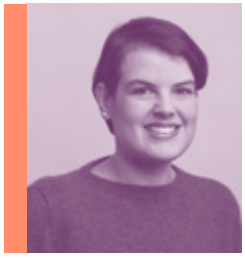
108 Institute of Education Sciences, National Center for Education Statistics. (n.d., b). *Adult training and education.* https://nces.ed.gov/nhes/ates.asp

109 Carpenter et al., 2017.

110 NCES created the Classification of Instructional Programs, which it calls "a taxonomic scheme that supports the accurate tracking and reporting of fields of study and program completions activity." Institute of Education Sciences, National Center for Education Statistics. (n.d., e). *What is the CIP?* https://nces.ed.gov/ipeds/cipcode/default.aspx?y=55. 12.0401, in the CIP 2010, is defined as "[a] program that generally prepares individuals to cut, trim, and style scalp, facial, and body hair; apply cosmetic preparations; perform manicures and pedicures; massage the head and extremities; and prepare for practice as licensed cosmetologists in specialized or full-service salons. Includes instruction in hair cutting and styling, manicuring, pedicuring, facial treatments, shampooing, chemical applications, esthetics, shop management, sanitation and safety, customer service, and applicable professional and labor laws and regulations." Institute of Education Sciences, National Center for Education Statistics. (n.d., c). Cosmetology/cosmetologist, general. In *CIP: The Classification of Instructional Programs.* https://nces.ed.gov/ipeds/cipcode/searchresults.aspx?y=55&aw=12.0401&sw=1,2,3&ct=1,2,3&ca=1,2,5,3,4

111 Normal time is defined as the length of time a full-time student would take to graduate. Normal time to complete a bachelor's degree program, for instance, would be four years. Normal time for an associate degree program would be two years. Normal time for students in certificate programs, like cosmetology school, will vary by program length. Normal time for this sample was, on average, 12 months.

About the Authors



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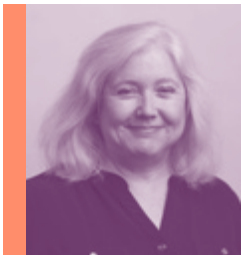

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