Dear Chair Frederick and Members of the Committee on Education,

I am writing today to respectfully express my opposition to SB 207 and its -4 amendment, However, SB 207 in its current form is not the right solution. While it identifies a real and pressing issue, it fails to provide a viable, structured, and equitable pathway to address it. The bill leaves too many critical questions unanswered and places the burden of implementation on the Board of Cosmetology without clear legislative guidance. On how the

First, the bill outlines a broad goal but does not provide a detailed framework for execution. The -4 amendment assigns the Board of Cosmetology the responsibility of developing eligibility criteria, supervising practitioner protocols, and any other "necessary rules" — but offers no support or structure to ensure these decisions align with the needs of students or the rigor of state licensure. There is no clarity on how students would receive the comprehensive, state-approved curriculum that prepares them for success in their careers and on their written and practical exams — exams that are costly and require travel to Salem for each attempt.

Second, the oversight and educational standards upheld by licensed schools are significant for good reason. Schools are held to high standards for curriculum, instructor qualifications, facility licensing, and ongoing professional development. To shift this responsibility to salons and spas — many of which are already navigating staffing shortages, hence the intent of this bill — is not only impractical, it's inequitable. The bill does not address who would cover the costs of instruction or whether salons would be required to pay students/apprentices, or vice versa. These are substantial gaps that could lead to inconsistencies in education and ultimately harm students more than help them.

Moreover, there are **existing, proven options** for rural students that already offer flexibility and accessibility, including:

- Competency-based programs that focus on skills mastery rather than clock hours;
- Shorter-term licensure tracks such as esthetics or nail technology, which can be completed in less than four months;
- **Hybrid learning programs**, which allow students to complete coursework from home and minimize travel.

I urge you to consider the long-term consequences of passing SB 207 as currently written and to explore other approaches that expand access without sacrificing the quality, safety, and integrity of cosmetology education in Oregon.

Thank you for your time and thoughtful consideration.

Sincerely, Samantha Hoffman Aveda Institute Portland