

Dear Chair Frederick and Members of the Committee on Education,

My name is Ray Motameni. I have been a salon owner in the Portland metro area for over 30 years, currently operating five Dosha Salon Spa locations. I am writing today to respectfully express my opposition to SB 207 and its proposed amendments.

While I recognize and support the goal of expanding access to cosmetology education — especially in underserved or rural areas — SB 207 in its current form is not the right solution. Though it identifies a real and pressing issue, the bill lacks the structure, clarity, and equity necessary for successful implementation. It leaves too many critical questions unanswered and places undue responsibility on the Board of Cosmetology without providing sufficient legislative guidance.

1. Legal and Employment Uncertainty

The bill fails to clarify the legal status of a provisional certificate holder. Will they be considered employees — and therefore subject to wage and labor laws, including federal and state income taxes, workers' compensation, and PTO? Or will they be treated as apprentices or independent contractors?

Many operators in Oregon function as independent contractors, completely separate from salon owners. If a provisional certificate holder is working without clear oversight — particularly while handling chemicals, sharp objects, or equipment that poses a risk of burns or injury — this creates serious health, safety, and liability concerns.

Without clearly defined legal and operational responsibilities, this bill exposes the student, the independent operator, and the salon owner to significant risk. The lack of guidance could result in accidents, safety violations, and potential lawsuits, even when the salon owner is not directly involved in training. Clear legal and regulatory frameworks are essential to protect all parties and maintain public trust in the industry.

2. Lack of Framework for Implementation

The -4 amendment assigns the Board of Cosmetology the responsibility of developing eligibility criteria, supervision protocols, and other “necessary rules,” but provides no specific framework or support to ensure these align with educational standards or student needs. There is no explanation for how students will receive a state-approved curriculum that prepares them for licensure exams — which are both costly and require travel to Salem. Without this structure, students may be left underprepared and disadvantaged.

3. Equity and Quality Concerns

Licensed schools are held to rigorous standards for curriculum, instructor credentials, facility oversight, and professional development. These exist for good reason. Shifting this responsibility

to salons — many of which are already facing staffing shortages — is not only impractical, it's inequitable. The bill does not answer key questions such as:

- Who will bear the cost of instruction?
- Will students be paid or required to pay the salon?
- What protections will ensure consistent quality of education?

Without addressing these gaps, the result could be an inconsistent and fragmented training system that does more harm than good for the students it intends to support.

Proven Pathways Already Exist

There are already effective and flexible options for rural and nontraditional students, including:

- Competency-based programs focused on skill mastery rather than clock hours;
- Short-term licensure tracks like esthetics or nail technology that can be completed in four months or less;
- Hybrid learning models that allow students to complete coursework remotely, minimizing travel.

Conclusion

I urge the committee to carefully consider the long-term implications of SB 207 in its current form. While expanding access to cosmetology education is a goal we all share, it must not come at the expense of quality, safety, legal clarity, and educational equity.

Thank you for your time and thoughtful consideration.

Sincerely,
Ray Motameni
President, Dosha Salon Spa