

Dear Subcommittee,

My name is Teono Smith an apprenticeship sponsor in the state of Iowa.

The Iowa House File 49 presents a complex landscape of benefits and drawbacks regarding barbering regulations. Here's a summary of the key points:

Pros:
1. **Increased Awareness of Unlicensed Barbers**: The legislation requires the Iowa Barber Board to acknowledge the presence of unlicensed barbers, which could lead to better regulatory scrutiny in the future.

Cons:
1. **Limited Oversight**: The Iowa Barber Board, with only 5-8 members, lacks the capacity to regularly monitor all barbershops and ensure compliance with the law. While they may have a list of names, without adequate oversight, the effectiveness of this regulation is questionable.

2. **Concerns with Merged Boards**: The merger of the barber and cosmetology boards means that regulations apply to both barbers and cosmetologists. This could lead to untrained individuals performing potentially harmful chemical treatments on clients with minimal oversight, raising safety concerns.

3. **Exploitation of Youth**: Barbershop owners might exploit young, inexperienced barbers by placing them in multiple locations, putting the health and safety of clients at risk. The lack of thorough inspections could lead to neglect of sanitation and proper chemical usage.

4. **Educational Impact**: The drastic reduction in required training hours from 1500 to just 2 hours poses a significant threat to traditional barber schools, which may struggle to attract students who see little value in lengthy, costly training when they can gain quick, on-the-job experience in a barbershop.

5. **Long-term Viability of Barber Schools**: The potential decline of traditional barber schools could lead to a shortage of skilled barbers in the long run, as fewer individuals may pursue formal education in the craft.

The push for Iowa House File 49 by lobbyist supporters who have federally registered apprenticeship programs raises several important questions regarding the necessity and implications of this legislation. Here are some considerations:

Redundancy of Regulation:
1. **Existing Framework**: If Iowa already has federally regulated apprenticeship programs under the Department of Labor, along with oversight from the Iowa Workforce Development and the Iowa Office of Apprenticeship, the need for additional state legislation may seem redundant. This existing framework is designed to ensure compliance with federal standards and protect both apprentices and consumers.

2. **Potential for Confusion**: Introducing state legislation that overlaps with federal regulations could create confusion for barbers, shop owners, and regulatory bodies. Clear and consistent regulations are essential for effective compliance and understanding of requirements.

Possible Motivations Behind the Legislation:
1. **Influence of Lobbyists**: The involvement of lobbyists may indicate that there are specific interests or benefits for certain stakeholders, such as barbershop owners or apprenticeship programs, that may not align with consumer safety or the interests of new barbers.

2. **Financial Incentives**: The lobbyists and their affiliated programs might stand to gain financially or gain market share by promoting a less regulated pathway to barbering, potentially at the cost of safety and quality.

Implications for Regulation:
1. **Quality of Training**: If the state legislation allows for a significant reduction in required training hours, it may lead to a workforce that is less prepared and less skilled, undermining the standards established by existing apprenticeship programs.

2. **Consumer Safety**: Maintaining higher standards and oversight is crucial for consumer protection. If the state legislation dilutes these standards, it could jeopardize the safety and well-being of clients.

Conclusion:

If the federal and state systems already provide a robust regulatory framework, the rationale for Iowa House File 49 needs to be critically examined. It is essential to ensure that any new legislation enhances, rather than undermines, existing federal government laws and standards for training and consumer protection in the barbering industry. Stakeholders should consider whether the proposed legislation serves the broader interests of public safety and professional integrity or primarily benefits a select group of lobbyists and their programs.