



April 21, 2026

Honorable Aisha Wahab, Chair and Members,
Senate Business, Professions, and Economic Development Committee
State Capitol, Room 2053
Sacramento, CA 95814

**Re: SB 1363 (Wahab): Board of Barbering and Cosmetology –
SUPPORT IF AMENDED**

Dear Senator Wahab, Assemblymember Berman, and Members of the Committees:

The Consumer Protection Policy Center (CPPC) respectfully submits the following testimony relevant to the Committees’ sunset review of the Board of Barbering and Cosmetology (BBC). As set forth in detail below, we believe that **BBC’s inspection program, enforcement program, and continuing education framework should be scrutinized and amended**. Not only would these reforms improve BBC’s ability to identify and discipline unsafe or dishonest licensees, but they would also better serve public protection, the Board’s paramount priority.

Accordingly, CPPC proposes retention of the Board but makes the following major recommendations (which are explained more fully below):

- 1) **Establish Mandatory Reporting Requirements:** BBC currently lacks mandatory requirements for licensees to report felony convictions, disciplinary actions, and other misconduct bearing on a licensee’s competence or integrity.
- 2) **Consider Establishing Continuing Education (CE) Requirements:** Multiple other states require continuing education for barbering and cosmetology licensees, and the Legislature should consider whether similar requirements would benefit California consumers.
- 3) **Support Option 2 in Section 10, Issue #1 of the Sunset Review Report:** While CPPC supports increasing BBC’s oversight over schools and requiring the Bureau for Private and Postsecondary Education (BPPE) to share information with the Board, BPPE should remain an independent check on the Board.
- 4) **Grant Esthetician Licensees Authority to Perform Microneedling:** Microneedling is currently considered outside the scope of practice for California

estheticians, but granting limited authorization to licensees would pose minimal risk to public safety.

About the Consumer Protection Policy Center

CPPC is a nonprofit, nonpartisan academic and advocacy center based at the University of San Diego School of Law. Since 1980, CPPC has studied the state's regulation of business, professions, and trades, and monitors the activities of state occupational licensing agencies and regulatory boards within the Department of Consumer Affairs (DCA). CPPC publishes the [*California Regulatory Law Reporter*](#), which chronicles the activities and decisions of California regulatory agencies. CPPC has participated in the sunset review of DCA boards and commissions since the onset of sunset review in 1996.

The Legislature Should Establish Mandatory Reporting Requirements

In Section 4 of the Sunset Review Report, BBC says that “[t]he Board has no mandatory reporting requirements.”¹ This means that licensees are not required to self-report felony convictions, civil judgments relating to fraud or negligence, and other misconduct that bear on their character or competence. As such, the Board relies primarily on unannounced inspections and consumer complaints to implement enforcement. While these methods are critical to ensure that the Board is aware of unsafe licensee practices, mandatory reporting would allow BBC to identify and focus on licensees who may pose a strong risk to public harm. To illustrate, it would benefit BBC to be aware of licensees who engaged in fraudulent practices so that false advertisements could be curtailed. Mandatory reporting would also help ensure that the Board is notified when a licensee is convicted of a felony involving sexual misconduct or other conduct bearing on public safety.

Requiring licensees to self-report would bring the BBC into closer alignment with many other DCA regulatory boards. For example, the California Board of Accountancy requires licensees to report certain events to the Board, including felony convictions, convictions for crimes involving fraud or embezzlement, civil judgments alleging negligence or dishonesty, settlements relating to the practice of public accountancy, and other incidents bearing on their character or fitness to practice.² Similarly, the Contractors State License Board requires licensees to report felony convictions and convictions for other crimes substantially related to the qualifications and duties of a contractor.³ Many healthcare licensing boards also have mandatory reporting requirements. Requiring licensees to self-report helps these boards determine whether the licensee poses a risk to public safety and reduces the chance that misconduct will go undisclosed. Requiring barbering and cosmetology licensees to self-report to BBC would further protect consumers and would impose no unreasonable burden on licensees.

¹ Sunset Review Report p. 60.

² See Bus. & Prof. Code § 5063.

³ See Bus. & Prof. Code §7071.18.

The Legislature Should Consider Establishing Continuing Education Requirements

BBC currently does not require its licensees to undergo continuing education. The Legislature should consider whether implementation of continuing education requirements would benefit public health and safety. Currently, eleven states require barbering licensees to complete continuing education requirements as a condition for renewal, and sixteen states require cosmetology licensees to complete continuing education.⁴ These courses are typically short, often only a few hours every one or two years, and generally focus on public health and safety subjects such as infection control and sanitation.

For example, Ohio requires both barbering and cosmetology licensees to complete four hours of continuing education requirements biennially, with one hour covering updates to Ohio law and three hours concerning safety and infection control.⁵ Texas similarly requires four hours every two years, including sanitation, human trafficking awareness, and elective topics.⁶ Florida requires barbers to complete two hours of HIV/AIDS education every two years and requires cosmetologists to complete ten hours biennially in topics including sanitation, sterilization, environmental issues, and OSHA.⁷

Other states have adopted more targeted continuing education requirements that the Legislature may also consider implementing. In South Dakota, continuing education is required only for cosmetology licensees who provide specialized services like eyelash extensions, microdermabrasion, and electric nail files, as well as for instructor licenses in cosmetology schools.⁸ Louisiana similarly requires continuing education for cosmetology and barbering instructors.⁹ As such, the Legislature should study the feasibility of implementing continuing education requirements, what form CE requirements might take, and whether they would benefit California consumers.

CPPC Supports Option 2 in Section 10, Issue #1 of the Sunset Review Report

Section 10, Issue #1 of the Sunset Review Report addresses proposals to reform BBC's ability to approve and oversee barbering and cosmetology schools. Currently, BBC shares approval and oversight authority with BPPE, with BBC limited to approving initial school applications, approving a school's curriculum and facility, and conducting health and safety inspections. BBC has expressed concerns that it cannot adequately investigate schools accused of fraudulent practices because it lacks broader inspection authority and does not receive BPPE's formal discipline and citation information automatically. Accordingly, BBC offers two alternatives for reform: Option 1 would grant BBC sole approval and oversight authority over schools, thereby removing BPPE's role, while

⁴ See [Barber License Renewal: CE Hours, Fees & Late Penalties by State](#), April 4, 2026, LicenseMap

⁵ See [Ohio Admin. Code § 4713-21-03](#).

⁶ See [Continuing Education for Barbers and Cosmetologists](#), Texas Department of Licensing and Regulation.

⁷ See [Barbers](#), Florida Department of Business and Professional Regulation.

⁸ See [South Dakota Cosmetology Commission](#), South Dakota Department of Labor and Regulation.

⁹ See [La. Stat. Ann. § 37:363](#); [La. Stat. Ann. § 37:583](#).

Option 2 would expand BBC's oversight authority and require BPPE to provide notice of citations and formal discipline to the Board.

CPPC supports Option 2 because BPPE should continue to serve as an independent check on BBC. Granting BBC sole authority over barbering and cosmetology schools would remove an important layer of accountability by consolidating school approval and oversight in a single entity. That, in turn, would risk public protection by reducing administrative checks if the Board were to approve a fraudulent school or conduct lax inspection and enforcement measures. Moreover, nearly half of BBC's membership is composed of barbering and cosmetology industry members, which furthers the risk for the Board to engage in licensee-protecting decision-making.

Additionally, there is value in maintaining BPPE's role because BPPE was created specifically to oversee California's private postsecondary institutions, which includes resolving consumer complaints and conducting inspections. BPPE possesses specialized institutional expertise in overseeing postsecondary schools that would be lost if BBC held sole regulatory authority, particularly in protecting students against fraud and misrepresentation. Therefore, the Legislature should support Option 2.

The Legislature Should Grant Esthetician Licensees Authority to Perform Microneedling

In California, microneedling is considered outside the scope of practice for licensed estheticians.¹⁰ Microneedling is a minimally invasive procedure used to treat skin conditions like acne scars, stretch marks, and wrinkles. It works by creating controlled micro-injuries in the skin using thin needles to stimulate the body's natural healing process and the production of collagen and elastin. The procedure is generally considered safe, with potential side effects like redness or swollen skin typically lasting only a few days.¹¹ Given this relatively low risk of harm, the present restriction unnecessarily hampers esthetician licensees and granting them authority to perform microneedling would pose minimal risk to consumers.

This authority, however, should be limited. Most states that allow estheticians to perform microneedling either require an advanced license, which California does not recognize, or impose limits based on how deep the needle penetrates the skin or the needle's size. For example, in Nebraska, esthetics may use needles "[u]p to and including .05 or .5 or .50 mm," with larger needles reserved for medical use.¹² In Maryland, needles may be no longer than 1 mm and may not penetrate the skin beyond the epidermis.¹³ Arkansas similarly permits both estheticians and cosmetologists to perform microneedling if the procedure does not penetrate beyond the epidermis.¹⁴ While microneedling should be

¹⁰ See [Estheticians](#), Board of Barbering and Cosmetology

¹¹ See Sharwari Jaiswal and Sugat Jawade, [Microneedling in Dermatology: A Comprehensive Review of Applications, Techniques, and Outcomes](#), *Cureus* 16(9) (2024).

¹² See [Cosmetology, Esthetics, & Body Art Advisory Opinions](#), Nebraska Department of Health and Human Services.

¹³ See [Md. Code Regs. 09.22.01.04\(D\)](#).

¹⁴ See [Cosmetology FAQs](#), Arkansas Department of Health

considered within the scope of practice for licensed estheticians, limiting how deep it may penetrate the skin would be necessary to ensure public safety.

CPPC appreciates your consideration of this testimony and these recommendations.

Sincerely,

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cc Kristy Underwood, Executive Officer, Board of Barbering and Cosmetology
Christine Lally, Acting Director, Department of Consumer Affairs
Hon. Monique Limón, Senate President pro Tempore
Hon. Robert Rivas, Speaker of the Assembly