

March 2024

NAIL FILES CALIFORNIA

A Study of Nail Salon Workers and Their Industry

CA HEALTHY NAIL SALON COLLABORATIVE
Liên Hiệp Ngành Móng Tay Lành Mạnh

UCLA Labor Center

Contents

Executive Summary	1
1. Introduction	6
2. Snapshot of Workers, Owners, and the Sector	9
3. Wages, Classification, Pay Models, and Consumers	14
4. Needs of the Workforce	22
5. Exploring Policy Interventions	31
6. Recommendations	37
Appendix A: Methodology	39
Appendix B: Consumer Survey Data Tables	41
Appendix C: Legislative Advancements	45
Acknowledgements	47
Endnotes	48



Executive Summary

California plays a crucial role in the national nail salon sector due to its labor force, the market, and its history of organizing and advocacy. The state is home to the largest number of licensed manicurists and the largest number of nail salons in the country. Transformed primarily by Vietnamese refugee women, the California nail salon industry has been a dynamic and growing one, marked by new technologies, changing trends and designs, and affordability.[1] At the same time, the nail salon has secured its position as a place of social significance, one that customers rely on for services as much as they do for care and intimate, social connection.[2]

Despite the relevance of the nail salon for self-care and pampering, most nail salon workers are undervalued and still face a myriad of labor issues. In addition to health and safety concerns—mostly related to the exposure to chemicals in cosmetics products linked to health issues including reproductive harm, respiratory issues, and cancer—the predominantly Vietnamese refugee women workforce experiences ongoing wage and hour labor violations, including below minimum wages and misclassification of employment status. There is insufficient enforcement by state agencies as well as insufficient language and culturally appropriate education on labor laws for workers and owners.[3]

The COVID-19 pandemic exacerbated ongoing challenges in the nail salon industry related to pay, health, and safety issues. Owners and workers alike had to struggle, albeit differently. Salons saw a reduced customer flow, where workers and owners felt the impact through less income. Workers in particular faced difficulty with covering bills, housing, and even food.[4] In addition, the economic and health aspects were layered with an increased climate of anti-Asian sentiment, such that the racialized, social, gendered, and economic impacts of the pandemic continue to affect the sector.

As new labor models and policies emerge, the industry is ripe for innovations that promote economic stability and justice. With the layers of crises of economic instability, political polarization, and racialized and gendered devaluing of service work, there is an opportunity to address such unpredictability and insecurity.

This report profiles the industry and its workforce to identify the gaps in research as well as the policy needs of the sector to better address its inequities and challenges, with a focus on (1) workers and owners across the state; (2) wages, pay structure, pricing, and consumption; (3) needs of the workforce; and (4) opportunities to strengthen the workforce.

The Statewide Nail Salon Sector is Growing, and the Workforce is Primarily Asian, Immigrant, and Refugee Women

- **The number of nail salons in California continued to increase during the past decade.** Nail salon workers have almost tripled, while the number of salons has nearly doubled. We estimate that there are 6,147 nail salons in California, with 127,480 manicurists that staff them.
- **Almost half of California nail salon workers are in Southern California.** The salons were concentrated in Los Angeles, Orange, and San Diego Counties.
- **Most nail salons can be classified as "microbusinesses."** Nine out of ten salons staffed nine or fewer employees, with two out of three having only five or fewer employees.
- **Nail salons and other personal care services industries have the largest share of Asian American and Pacific Islander (AAPI) workers in the state.** Within that, manicurists were the occupation with the largest share of Asian workers in the state (65%). 85% of the workers identified as female, 84% as Asian, and 81% were born outside of the U.S. Among those born outside of the U.S., 82% were born in Vietnam.
- **Nail salon workers were also more likely to be middle-aged.** The largest concentration of workers were 45-60 years old; they skewed older compared to other workers in California.

The Workforce is Still Recovering from COVID-19

- **Annual payroll dropped during the pandemic.** From 2016 to 2019, the annual payroll increased from $300 million to about $450 million across all nail salons in California. However, in 2020, the total annual payroll dropped to $250 million, reflecting the impacts of shelter-in-place orders.
- **Nail salons faced extended periods of shutdowns during 2020–21.** This included statewide orders as well as county-level mandates due to COVID-19.
- **Owners and workers reported a sharp decline in customer flow.** Through our own consumer survey, we found that 41% of consumer respondents currently visit nail salons once every two to three months.
- **Many workers have had a hard time finding full-time jobs.** In focus groups, salon workers discussed the lack of availability of full-time jobs, as well as the need to add on one or more part-time jobs at other salons in order to make ends meet.

Nail Salon Workers are Misclassified and Earn Low-Wages

- **Nail salon workers are low-wage workers.** The vast majority (80%) of nail salon workers are considered low-wage workers (they earn less than $17.08 per hour).
- **Nail salon workers make less than minimum wage.** Nail salon workers reported a low hourly median wage of $10.94, which is less than the $13.00 minimum wage for businesses with 25 employees or fewer. This is less than half the median wage of all other workers in California, which is $23.43.
- **Nail salon workers are full time, and most work year round.** Just over half of nail salon workers worked full time, and a higher proportion (82%) of full-time nail salon workers are low wage relative to part-time workers (77%). In comparison, these rates are lower than those of all other workers in California.
- **Nail salon workers are self-employed.** Almost a third of the workforce were classified as self-employed rather than as employees who work for wages (i.e., receiving a W-2). This is three times higher than all other workers in California.
- **Nail salon workers require further food and housing security.** Fifteen percent of workers receive CalFresh/Supplemental Nutrition Assistance Program (SNAP) benefits. Low wages also affect workers' ability to access adequate housing: 65% of workers were rent-burdened or severely rent-burdened, and 19% lived in overcrowded households.

- **Nail salon workers require health support.** Of those with health insurance, 43% received coverage through Medicaid (also known as Medi-Cal in California), compared to only 13% of all other workers.
- **Consumers are willing to pay more for better nail salon worker labor conditions.** Consumers surveyed were generally willing to pay about $10 more if salons offered better labor conditions to workers.

Labor Education and Workforce Training Can Increase Nail Salon Worker Capacity

- **Nail salon positions did not require a college degree.** More than half of nail salon workers had a U.S. high school education or more, with only one-quarter of salon workers having some college or associate's degree level.
- **Nail salon jobs did not require English fluency.** Among workers not born in the U.S., more than half of nail salon workers spoke little to no English and/or were proficient in other languages.
- **Job training occurred through formal and informal sites.** Nail salon workers in the focus groups described how they receive training for the job through a beauty school. Only some received any subsequent informal follow-up training from a salon owner, experienced staff at the salon, friends, or even online through tutorials on YouTube.



Recommendations

Nail salons have been the site of economic and cultural activity for the largely Vietnamese immigrant and refugee female workforce. To address inequities in the sector and support economic stability and justice for nail salon workers, we recommend that the state promote workers' rights and proper classification by:

- **Providing educational opportunities for workers and employers** about their labor rights and responsibilities with culturally and linguistically appropriate materials, such as language and culturally accessible virtual training and mailings for all manicurists and salons licensed by the California Board of Barbering and Cosmetology (BBC). Additionally, develop government-community partnerships that would conduct joint enforcement efforts alongside workers' rights organizations to support nail salon workers' participation in training programs.

- **Improving language, cultural, and technological accessibility of information for workers and owners** on labor laws with state labor agencies. For instance, developing a translated webpage specific to the nail salon worker and owner community with up-to-date information included on agency websites and other materials.

- **Creating multi-stakeholder partnerships that establish comprehensive education, outreach, and incentive programs** to assist owners in continuing or transitioning to labor law compliance. These partnerships should include information on business practices that support sustainability, how to address good pay, scheduling, and benefits, and advancement opportunities for workers.

- Through a collaborative partnership with community-based organizations (CBOs) and nail salon owners and workers, **developing a campaign to educate nail salon consumers on why it is important to pay a fair price** for nail services.



1. Introduction

California plays a crucial role in the national nail salon sector due to its labor force, the market, and histories of advocacy. The state holds the largest number of nail salon establishments and licensed manicurists in the country, and is also at the forefront of industry and labor organizing innovation.[5] Transformed primarily by Vietnamese refugee women, the nail salon business in California became widely available and more affordable beginning in the 1980s.[6] The number of salons increased statewide in the following decades, and the industry became a multibillion dollar market nationwide in the 2010s.[7] While many industries struggled during the 2008 economic recession, nail salons remained steadfast as a place of small business and employment; they advanced new trends in design, style, and beauty, and also formed a place of social relevance for body and care practices within the beauty service industry and even the service industry at large.[8]

The nail salon is an intimate space, and the shop floor is small, as a majority of the salons in California had five or fewer employees in 2021.[9] A manicurist and a customer sit in close proximity to each other, hold hands, and at times, share stories, all of which contributes to the personal feel of the services. Now, the nail salon has become a regular place of grooming and beautification, with customers who rely on weekly body care services as much as they do the social connection.[10] The COVID-19 pandemic only amplified the role that salon workers and the salon play—providing a space for a customer's pampering, relaxation, and care—and also demonstrating how the interactions in personal care and beauty service salons have taken on a stronghold in the U.S. According to the U.S. Bureau of Labor Statistics, employment of manicurists and pedicurists is projected to grow 9 percent from 2022 to 2032, much faster than the average for all occupations.[11]

Despite the social significance of the nail salon for self-care and pampering, most nail salon workers are undervalued and still face a myriad of labor issues. This includes the lack of basic labor, health, and safety protections. Documentation of occupational health and safety issues due to salon-based workplace exposure points to a host of chemicals linked to respiratory illnesses, skin reactions, and even cancer related to cosmetics' product ingredients, as well as ventilation concerns.[12] Additionally, the poor wages and misclassification of employment in the industry also cause ongoing concerns with pay, which challenge salon workers' ability to make ends meet. Sample studies and investigative reporting demonstrate such routine experiences of labor violations. For example, in a 2009 study that included nail salon workers in Chicago, Los Angeles, and New York, one in two workers were not paid minimum wage, eight out of ten workers were not paid overtime, and eight out of ten did not get meal breaks.[13] A 2016–17 California survey of Vietnamese nail salon workers found a high prevalence of misclassification, an issue which limits the steps a manicurist can take to receive minimum wages, overtime, paid breaks, and workplace benefits.[14]

The COVID-19 pandemic exacerbated these pay, health, and safety issues. With the shelter-in-place statewide orders in March 2020 and the needed initial emphasis on social distancing, salons were forced to close for most of the year. As some salons across the state reopened or were set to reopen based on designated county-level tiers, they were forced to quickly reclose as cases surged again, with some counties requiring salons to close for up to eight of the first months of the pandemic.[15] Ultimately, nail salons faced immense financial and emotional strain during this time, with owners unsure how to cover payroll and ongoing expenses, and workers reeling from a collapsed customer base and wrestling with job loss. Owners and workers alike had to struggle, albeit differently, dealing with a decline



in work, slow customer flow, and less income, challenges which posed difficulty with covering bills, housing, and even food. On top of that, nail salons, with a predominantly Asian immigrant and refugee workforce, were falsely blamed for the start of the local spread of COVID-19 in California.[16] From lingering anti-Asian sentiment to many economic and health repercussions, the impact of the pandemic is ongoing and reverberated across the sector.

California has a responsibility to innovate and foster equitable and just nail salons as a model across the country. With the layers of these crises of economic instability, political polarization, and racialized and gendered devaluing of service work, there is an opportunity to address such fragmentation. The salon remains a place for connection and community, where further innovations in labor organizing and economic justice provide new possibilities to eliminate barriers and influence change.

About the Study

This study takes an in-depth look at the nail salon industry in California to understand the experiences and challenges faced by low-wage Vietnamese immigrant and refugee women workers. Using existing literature and administrative data, the report profiles the industry and its workforce to identify the gaps in research as well as the policy needs of the sector to better address its inequities and challenges. The study team also conducted an online survey in the summer of 2023 of 500 consumers of nail salon services in California. We also conducted two online focus groups: one with seven nail salon workers, and the other with eight salon owners, recruited through the California Healthy Nail Salon Collaborative. The study team analyzed the focus groups for core themes and participant quotes included throughout the report. For further description, see the Technical Appendix for in-depth details about the survey and focus group methodologies.

The first section of this report provides an overview of workers and salons across the state, including demographics and characteristics to describe the industry. The second section captures concerns about wages and pay structure, as well as pricing and consumption. The third highlights key needs of the workforce, from the impact of the pandemic to issues of equity regarding gender, age, language, and environment. The fourth focuses on policy opportunities and how to strengthen labor practices for the training, mobility, and overall economic well being of nail salon workers. The last section provides key recommendations for the California nail salon sector to move forward.



2. Snapshot of Workers, Owners, and the Sector

Overview of Workers and Salons in the State

Based on California Board of Barbering and Cosmetology (BBC) licensing data, there are over 127,850 manicurists in the state.[17] According to County Business Patterns (CBP) 2021 data, there are about 6,147 nail salons in California.[18] Depending on the data source, the number of nail salon workers and establishments in California can differ, demonstrating a likely undercount in some sources.[19]

Table 1: Nail Salon Workers and Nail Salons in California

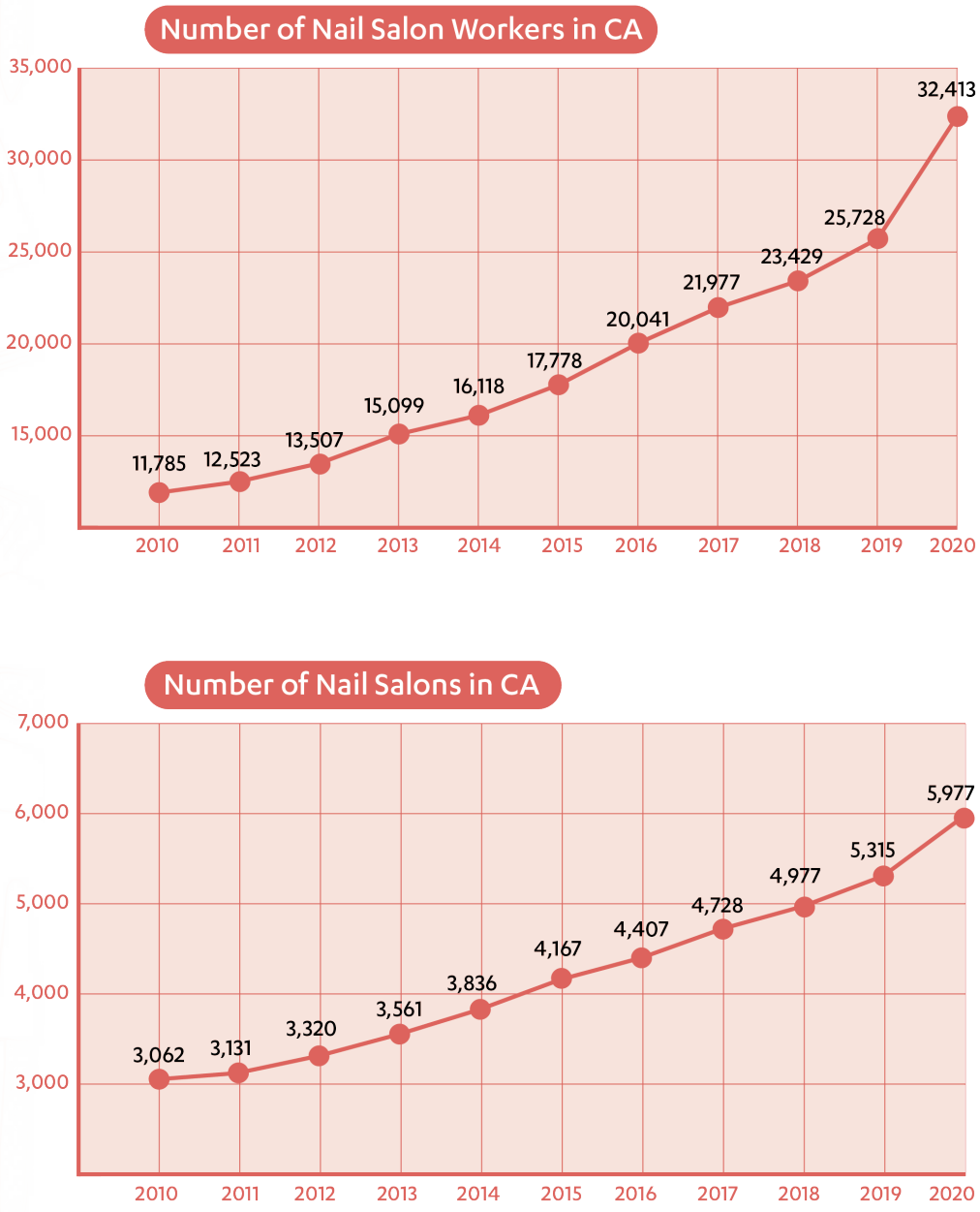
Source	Category	Estimate
California Board of Barbering and Cosmetology 2023	Manicurist - Active Licenses	127,480
County Business Patterns	Nail Salon Establishments	6,147

Source: California Board of Barbering and Cosmetology Licensing Data 2023 and County Business Patterns 2011–2021

According to CBP data, the nail salon workforce in the state has almost tripled over the last 10 years, increasing from approximately 12,000 to about 32,000 employees. During the COVID-19 pandemic in 2020, nail salon employment levels dropped across the state, from over 32,000 workers in 2020 to nearly 23,000 in 2021.

The numbers of nail salons also increased during the past decade. In 2010, there were 3,062 nail salons and by 2020, that number had nearly doubled. The industry continued to steadily grow until the COVID-19 pandemic. To assess the decade, we use the CBP data from 2010 through 2020 because 2021 was an exceptional year due to the pandemic. This is because CBP calculates its annual count of paid employees during the week of March 12. March 12, 2020 was before most COVID-19 shelter-in-place policies took place and the subsequent impact of unemployment in non-essential work.

Figure 1: Number of Workers and Nail Salons, 2010-2020



Source: County Business Patterns, 2011–2021

To provide a snapshot of worker characteristics, we use the U.S. Census Bureau's American Community Survey (ACS) 5-year (2017–2021) estimates, which offer employment data with demographics. Based on the ACS, almost half of California nail salon workers are in Southern California, specifically, Los Angeles, Orange, and San Diego counties. Cumulatively, the 11 counties with the most nail salon workers in California account for about 8 out of 10 nail salon workers in the state.[20]

Table 2: Top 11 Counties in CA with the Largest Proportion of Nail Salon Workers & Salons

County	Workers	Nail Salons
Los Angeles County	23%	28%
Orange County	17%	11%
San Diego County	8%	8%
Santa Clara County	7%	5%
Sacramento County	6%	5%
San Bernardino County	6%	5%
Riverside County	6%	6%
Alameda County	3%	5%
Kern County	3%	1%
San Francisco County	2%	3%
Contra Costa County	2%	4%

Source: American Community Survey 5-Year Sample 2017–2021 and County Business Patterns 2021

Select Characteristics of Workers and Owners

The following demographics are for nail salon workers currently in the labor force (employed and unemployed). In 2021, the nail salon workforce was predominantly composed of Asian women, with 85% of the workers identified as female and 84% as Asian. This is a stark contrast to other workforces in California, where the gender split is more evenly, and demonstrates how the nail salon sector is highly feminized. Furthermore, the nail salon and other personal care services industries have the largest share of Asian American and Pacific Islander (AAPI) workers, which make up 38% of the workforce.[21] Within that, manicurists are the occupation with the largest share of Asian workers (65%).[22]

Business owner demographics are not available in government data sources, but the application to the Paycheck Protection Program (PPP) during COVID-19 included questions about race and gender that provide us with insight into who employers are in the industry.[23]

Among PPP applicants who answered questions about their gender, race, and ethnicity, an overwhelming majority (97%) identified as Asian and 60% as women. Cumulatively, this information helps provide a full picture of the industry, where both workers and owners are largely Asian women; this also highlights how in some cases, workers themselves learn the process and method to run a salon and eventually become owners.

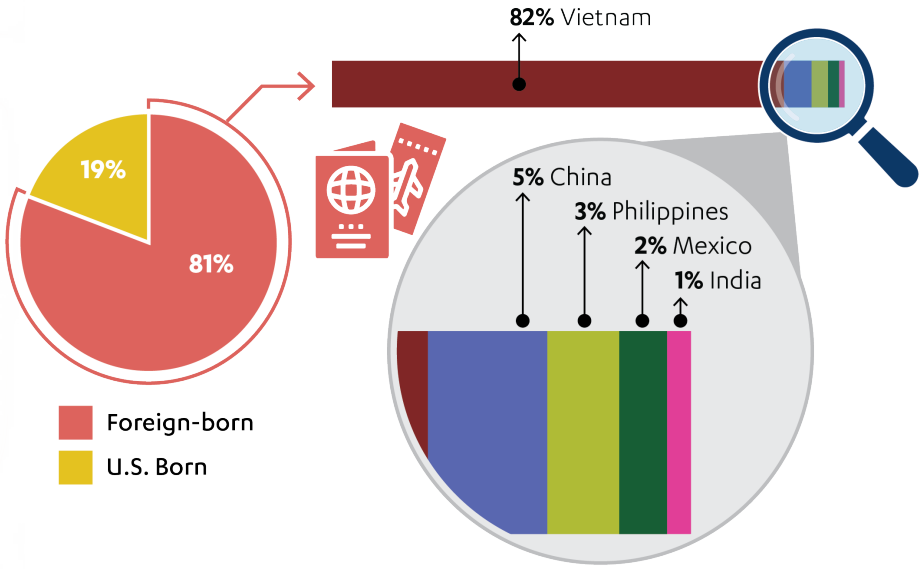
Table 3: Demographics of Nail Salon Workers and Owners

	Nail Salon Workers	Nail Salon Owners[24]
Sex		(n=1708)
Female	85%	60%
Male	15%	40%
Race		(n=1496)
Asian	84%	97%
Black	0.4%	1%
White	8%	2%
Other	2%	<1%
Ethnicity		(n=1399)
Latinx	6%	<2%

Source: American Community Survey 5-Year Sample 2017–2021 for workers and PPP Loan Data 2021 for Owners

Eighty-one percent of nail salon workers in California were born outside of the U.S. Among them, 82% were born in Vietnam, followed by China (5%), Philippines (3%), Mexico (2%), and India (1%). Among those born outside the U.S., three-quarters had lived in the U.S. for more than a decade. Only eight percent of foreign-born workers were recent immigrants, having lived in the U.S. for less than five years.

Figure 2: Place of Birth of Nail Salon Workers, 2021



Source: American Community Survey 5-Year Sample 2017–2021

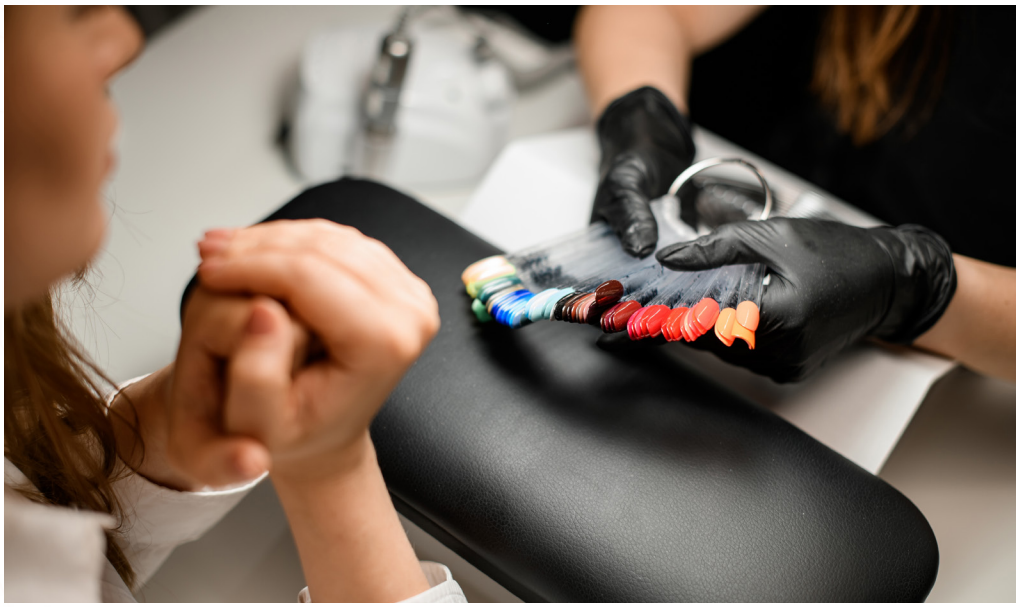
Mom and Pop Industry

Most nail salons can be classified as "microbusinesses" because they staff nine or fewer employees, according to the U.S. Small Business Association. A business can be labeled a "small business" with up to 100 workers, but the nail salon operates at a much smaller scale. More than two-thirds of nail salons had fewer than five employees. About a fifth had between five and nine employees. The vast majority of nail salons are mom and pop shops that are independent, small, and often family-owned.

Table 4: Establishment Size[25] by Number of Employees in California

Establishment Size by Employees	% of Salons	Number of Salons
Fewer than 5 employees	69%	4,268
5–9 employees	22%	1,341
10–19 employees	8%	465
20–49	1%	72
Total	100%	6,146

Source: County Business Patterns 2021



3. Wages, Classification, Pay Models, and Consumers

This section describes the current state of economic and labor conditions for nail salon workers and owners. First, we use ACS data to profile how the nail salon workforce is constituted of mostly low-wage workers and to show the impacts of low wages on their lives. Second, we illustrate the complexity of classifying nail salon workers in terms of tax categories like W-2 and 1099 independent contractors. Third, we show the two types of business pay models that nail salons used. We end the section with original survey research about consumers' willingness to pay more for better labor conditions for workers.

Low Wages and Impact on Families

Before the COVID-19 pandemic, the total annual payroll for employees was on an upward trend. From 2016 to 2019, annual payroll increased from $300 million to about $450 million across all nail salons in California. In 2020, the total annual payroll dropped to $250 million, reflecting the impacts of shelter-in-place orders. The table below shows these trends for California and in the top 3 counties: Los Angeles, Orange, and San Diego. Focus group discussion confirms this data, as salon workers and owners both stated that customer flow had decreased and that salon workers have had a hard time finding full-time jobs. Some salon workers also discussed having to add on one or more part-time jobs at other salons in order to make ends meet.

Table 5: Total annual payroll ($1000), 2016–2020

	2016	2017	2018	2019	2020
California	$303,688	$346,505	$387,697	$450,910	$250,548
Los Angeles County	$80,789	$90,598	$103,290	$117,206	$65,835
Orange County	$26,222	$31,925	$34,480	$36,761	$27,620
San Diego County	$37,958	$41,947	$45,681	$52,065	$27,509

Source: Quarterly Census of Employment and Wages 2016–20210

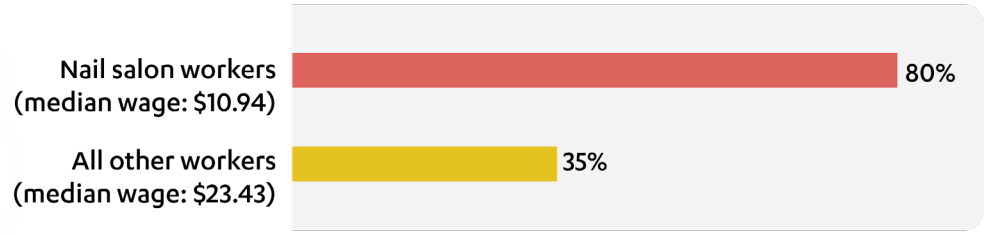
Table 6: Average Annual Pay to Employees, 2016–2020

	2016	2017	2018	2019	2020
California	$15,483	$15,987	$16,684	$17,552	$14,669

Source: Quarterly Census of Employment and Wages 2016–20210

The vast majority (80%) of nail salon workers are considered low-wage workers. We define low-wage workers in California as those who earn less than $17.08 per hour, which is two-thirds of the 2021 median wage for full-time workers in the state. This proportion is more than double the state proportion of 35% for all other workers. In the focus groups, salon workers note that the low wages are not enough: "With the salary I earn, it only contributes to a part of the expenses in the family, but it's not enough to cover them." Another adds, "I only work part-time in nails. I also work elsewhere. [This is] to say that working in nails alone is not enough. [...] I still have to take care of other expenses like school tuition and such." Salon workers have to find other means of support, like taking on second and third jobs. Additionally, a higher proportion (82%) of full-time nail salon workers are low wage relative to part-time workers (77%).

Figure 3: Low-Wage Rates Among Nail Salon Workers and All Other Workers in California, 2021



Source: American Community Survey 5-Year Sample 2017–2021

Nail salon workers reported a low hourly median wage of $10.94. This is less than half of the median wage of all other workers in California, which is $23.43. Full-time nail salon workers earned slightly less than part-time workers. Strikingly, full-time nail salon workers also made less than the state minimum wage ($14 an hour in 2021). This could be for various reasons, such as being paid a daily flat rate that could be lower than a part-time worker's hourly rate, or it could be due to being paid under the table. [26] For example, two salon workers who are paid based on commission but see the same number of customers will have different hourly wages: the first salon worker who works six hours and sees three customers can make less than a salon worker who worked four hours and also saw three customers.

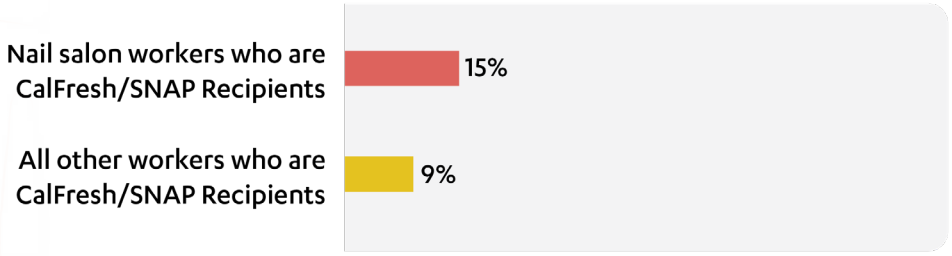
Table 7. Nail Salon Workers' Hourly Median Wage, 2021

	Nail Salon Workers	All other workers in CA
Full-time hourly median wage	$10.16	$25.69
Part-time hourly median wage	$11.99	$15.53
All workers hourly median wage	$10.94	$23.43

Source: American Community Survey 5-Year Sample 2017–2021

Fifteen percent of workers receive CalFresh/Supplemental Nutrition Assistance Program (SNAP) benefits, compared to just nine percent of all other workers in California. In focus groups, salon workers emphasized how receiving support from public government resources (e.g., SNAP, Medicaid, etc.) supplemented their low wages. Others discussed making ends meet despite their low wages with the support of other household members' income. One salon worker shared very specifically about what their salary contributes to: "my salary is only a bit more than $200 a week, which is less than $1,000 a month. But to be honest, I only make enough for food shopping and my husband handles all the rest of the expenses at home."

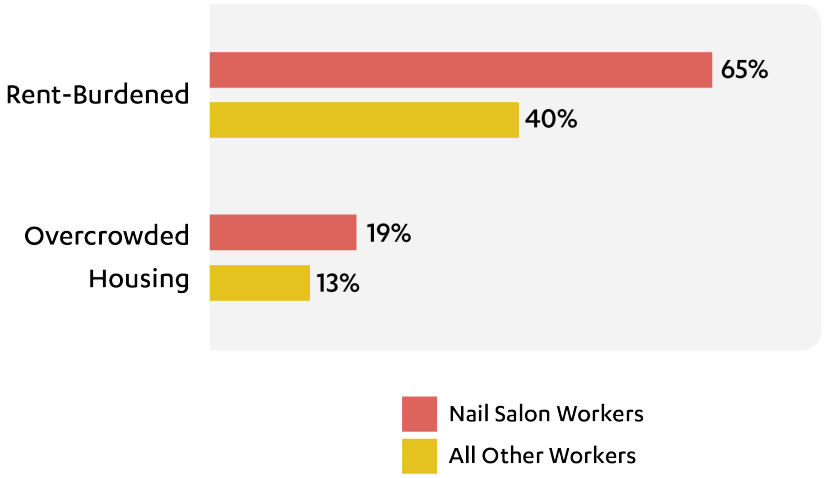
Figure 4. CalFresh/SNAP Recipiency, 2021



Source: American Community Survey 5-Year Sample 2017–2021

In addition to salary and supplemental resources, housing insecurity is also a significant issue for nail salon workers. Census data show that 65% of workers were rent-burdened or severely rent-burdened.[27] Additionally, 19% of nail salon workers live in overcrowded households compared to 13% of all other workers.[28]

Figure 5: Rent Burden and Overcrowding, 2021



Source: American Community Survey 5-Year Sample 2017–2021

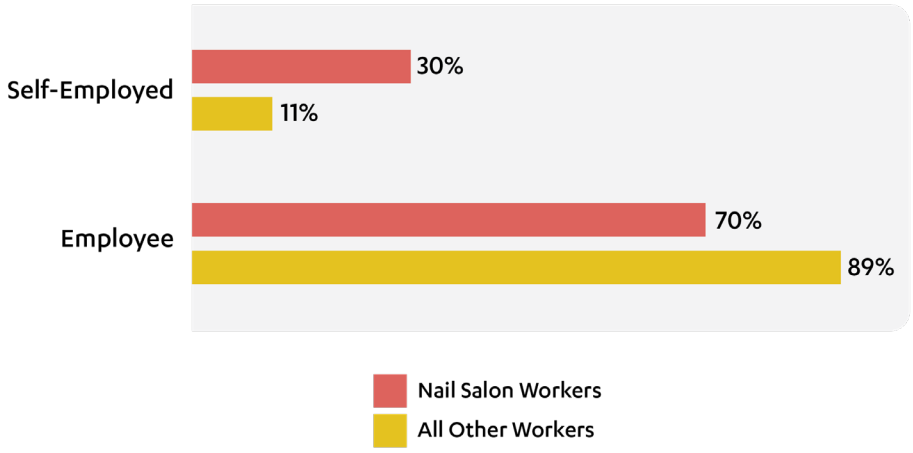
In the focus groups, owners discussed the impact of the rising cost of living in comparison to customers' spending priorities. With a decrease in customer spending and customer flow, some salon owners are struggling to break even. A 2023 article in *Cosmetics Design* captured how for the first time, sales of at-home beauty care treatments like the use of artificial and press-on nails have surpassed nail polish sales, likely due to the COVID-19 pandemic.[29] One owner discussed the cost of living and how it has impacted salon profits:

Regarding inflation, it's clear that people now focus on essentials, like housing, rent, mortgage, and all the bills, meaning the essential costs of living. Beauty and care services like ours used to be regularly sought [after], but due to inflation, people have started cutting back. Therefore, trying to maintain our profit, which has already decreased, and keeping it in the salon is a very sensitive issue. Previously, salon owners might have made some profit, but now, to be honest, we only feel like we have enough to pay the wages of our staff and cover all the expenses in the salon, and there's only a little left for the owner. Sometimes, when we break even, we feel very lucky.

Employee vs. Independent Contractor Classification

A manicurist can be an employee or an independent contractor. Employees are hired directly by the salon and work for wages. Independent contractors typically act as their own business and do not work for the salon. Often, they bring in their own supplies, have their own clients, set their own hours, etc.[30] Self-employed workers can be independent contractors, a sole proprietor, or a member of a business partnership. Almost a third of the workforce was classified as self-employed rather than as employees who work for wages (i.e., receiving a W-2). This is three times higher than all other workers in California.

Figure 6: Employee and Self-Employed Status of Nail Salon Workers And All Workers, 2021



Source: American Community Survey 5-Year Sample 2017–2021

In focus groups conducted with nail salon workers and owners, both perceived that independent contractors comprised a sizable portion of the workforce. One salon worker stated about the number of employees at their salon, "I don't see anyone here [who] is paid by the hour. They either get a daily wage or work on commission." Both workers and owners also described how complicated the pay structure was within the industry.

Business Model/Pay Structure

Unlike other industries, there is no standardized system of paying nail salon workers. To get a sense of current pay structures in salons, we interviewed individual owners and workers across California and complemented their insights with data from focus groups. From these interviews, we gathered that there are two primary pay structures: 1) hourly rate and 2) split pay.

An **hourly rate** structure can be understood as employees receiving a set hourly wage that is recorded as a W-2 tax form.

A **split pay** structure can be understood as getting paid based on commission. These types of employees receive a percentage of the revenue generated from the services they provide. Common split rates in the industry are a 50/50 split or a 60/40 split. In other words, a split-pay employee on a 60/40 split would earn a 60% commission on the service they provided, with the other 40% going towards the employer. These employees are typically independent contractors who file 1099 tax forms.

Worker and Owner Perspectives on Pay Structures

A single salon can have multiple pay structures. Owners had mixed opinions on which pay structure was better for owners. Some owners believed that the split pay structure worked better because there was less administrative work to handle (e.g., no payroll tax accounting, no hours worked accounting) or that it generated more revenue. However, other owners preferred the hourly rate structure because it could result in higher profits during peak seasons.

On the workers' side, there were different reasons why a worker would have preferred an hourly rate or split-pay pay structure. Some workers preferred to receive split pay because they had developed a list of returning customers and felt stable about customer flow and thus about pay; other workers preferred being paid an hourly rate because they wanted benefits. It depended on workers' comfort with new designs and trends in relation to sustaining new customers as well as whether they worked full or part-time. It was generally accepted among workers and owners that split pay worked best for workers who have more training on designs and techniques, and who were able to build their own client base.

Whether a salon owner paid for access to personal protective equipment (PPE), however, did not seem to be correlated with pay structure. However, owners generally provided nail polish for workers to use.

In the focus group, owners commented on how their employees receive pay and the positive impact that has on benefits and even retirement. One owner said, "It's been nearly 20 years, and all [staff] have been receiving W-2. That's fortunate for the salon, and it's also fortunate for the salon's work environment. [...] During the pandemic, some employees retired, so there were two retirees who also received W-2 since they started working at the salon, about nearly 20 years ago. When they retired, their retirement pay was very good." Other owners described their pay structure in terms of how they perceived workers wanting to receive benefits.

However, some salon workers noted how employers offered different, and even unwanted, options for them when they started the job. In one example, a salon worker said, "I want to be classified as W-2. But my salon owner, I don't know why, [...] said they only want to use 1099, they don't want to use W-2. And I really want to be classified as W-2 because with that I pay taxes. For example, if I become unemployed for any reason, I can still receive unemployment benefits, but with 1099, I heard it is possible to apply but it is very difficult." At another salon, "the owner advises everyone to choose W-2. [...] I think if I choose W-2, then I file taxes, and later, [...] I'll have the documents to have future benefits, so [...] I really like to choose W-2." It is clear that such initial employment options have a long-term impact on salon worker access to benefits such as unemployment insurance and retirement.



Consumers' Willingness to Pay More

We also surveyed consumers on how willing they were to pay more for services if the price increase was to provide workers with better pay/wages, benefits (e.g., paid time off and health insurance), and job training/professional development. For these questions, we asked consumers to rate their willingness on a scale of 10, with 10 being very willing and 1 being not willing at all. Consumers are generally willing to pay more to provide better labor conditions, and the median amount they were willing to pay was about $10 extra.

Table 8: Proportion of Consumers Willing to Pay More for Services to Provide Better Labor Conditions

Whether consumers are willing to pay more on a scale of 1–10	% Who Would Pay for Better Pay/Wages	% Who Would Pay for Benefits like PTO and Health Insurance	% Who Would Pay for Job Training/ Professional Development
Median Scale Choice	7	7	8
1–2 (1 not willing at all)	5%	4%	4%
3–4	8%	8%	6%
5–6	28%	25%	26%
7–8	30%	33%	27%
9–10 (10 very wiilling)	29%	30%	36%

Source: CA Nail Salon Consumer Survey 2023

One of the factors owners use to determine prices for services is the type of healthy and less toxic products they use, but many noted it is difficult to determine practices that reflect the quality of the products while maintaining some profit margins. About pricing and products, one owner noted that "my salon charges a high price, the services are expensive. Firstly, we only serve customers by appointment. Secondly, the products we use, we make sure to buy less chemical contents, not completely chemical-free, to maintain the standard of the salon. But the profit margin is not as good as before. It's different now."



4. Needs of the Workforce

In this section, we provide data that can inform workforce development for the nail salon industry. Specifically, we touch on five topic areas related to workforce development: 1) recovering from COVID-19, 2) supporting an aging workforce, 3) supporting women in the workforce, 4) ensuring accessible language and training support, and 5) ensuring health and safety for workers and consumers.

Economic Recovery and COVID-19

Nail salons faced extended periods of shutdowns from statewide orders as well as county-level mandates due to COVID-19. While some counties allowed nail salons to reopen during early summer 2020, others were only allowed to operate outdoors beginning in August and September 2020, including in Los Angeles County. Yet for those in major counties, the reopening came to a close again in December 2020. After, the state allowed nail salons to reopen at limited capacity in January 2021 and at full capacity in June 2021.[31] A June 2020 survey found that 54% of workers were unsure if they would be able to pay for food and other necessities in the next month.[32]

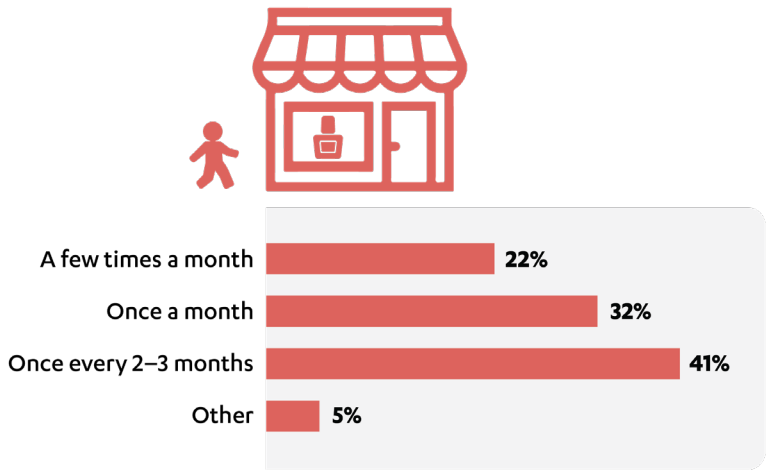
In focus groups held in August 2023, several nail salon workers commented on the changes in the industry since returning to the job during the pandemic. Some workers described the importance of pandemic assistance and PPE, while others discussed the negative economic impacts of a notable decrease in customer

flow. One worker discussed the relationship of cost to customer flow, that "In the pandemic, the supply costs went up, so the salon increased the prices, [...and] gradually I see fewer and fewer customers coming to the salon [...]. The number of regular customers I had, they disappeared and there are only a few left. So, it looks like the salon now doesn't seem as bustling as before." The nail salon sector and its remaining employees continue to reel from the impact of the pandemic and ongoing changes.

In many counties, the number of small-scale salons (with less than 5 employees) dramatically increased after 2020 when the COVID-19 pandemic took full effect. In the focus groups with owners, one owner from Alameda County noted how salons have downsized: "After the pandemic, I have many friends who are salon owners [that had] many workers. A salon that used to have ten employees now has much fewer [during the pandemic]. So, they [had] to reduce work hours and cut shifts, and for the hours they don't work, they have to go to the government for help. There's no other way... there's no way to do otherwise."

After COVID-19 restrictions were lifted and salons started to reopen, nail salon workers and owners noticed a considerable decrease in customers. Through our own consumer survey, we found that 41% of consumer respondents visited nail salons once every two to three months. Almost a third frequented a nail salon monthly, and less than one-quarter went a few times a month. Since fewer consumers are visiting salons less, such as only a few times a month or once a month, this may contribute to salons scaling down on the number of workers or worker hours. As previously noted, the vast majority of salons have fewer than five employees since they are unable to keep up with paying wages.

Figure 7: Frequency of Visiting Nail Salons



Source: CA Nail Salon Consumer Survey 2023

Supporting an Aging Workforce

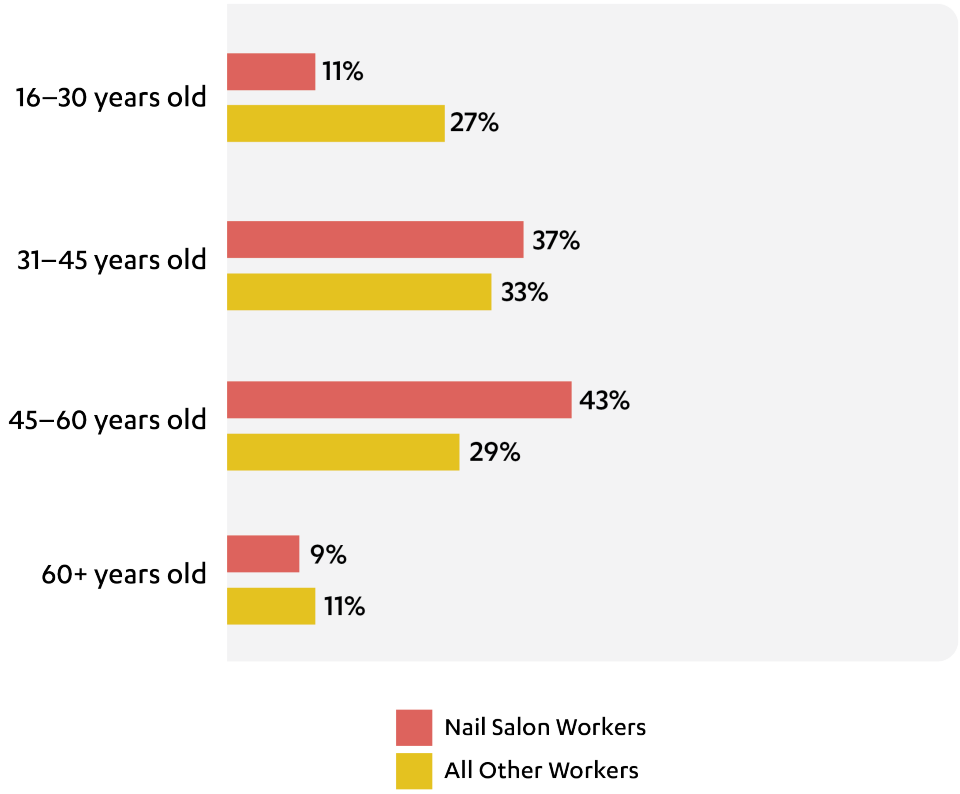
In focus groups, workers also commented on their duration in the industry, with some having stayed in the industry for over two decades, and most having been in the industry and at their current salon for nearly a decade.

Nail salon workers were also more likely to be middle-aged (45–60 years) and skewed older compared to other workers in California. In the focus groups, nail salon workers in the older age bracket recognized the toll of the physical and manual labor of the pedicures and manicures. One said, "I'm also getting older, [and] I can't do as much, so I only work with my physical limits." Another older worker commented, "The profession [...] requires more ability from younger people. But since I'm older, I only do basic manicures and pedicures and basic gel applications." In other words, remaining in the sector at an older age required a shift in service offerings because of ability.

Considering the workforce development needs of this industry, the aging workforce suggests we need to create career ladders and pathways, bringing in new trained workers that see opportunity for themselves in industry, while supporting older workers in other types of job tasks in the salon. Most nail salon workers do not have access to retirement benefits and try to work beyond traditional retirement years in order to ensure some type of income. About 9% of nail salon workers are 60 years old or older.



Figure 8: Nail Salon Workers Age, 2021



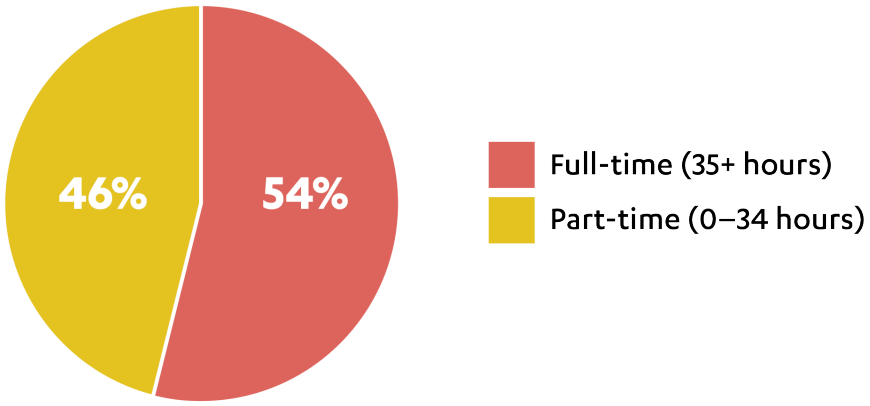
Source: American Community Survey 5-Year Sample 2017–2021

Supporting Women in the Workplace

As the majority of the industry is women, the workforce deals with gendered responsibilities. Based on those currently employed, just over half of nail salon workers worked full time and most worked year round. In comparison, these rates are lower than that of all other workers in California. Nail salon workers in focus groups stated that they work part time primarily to be able to take on other gendered care and life responsibilities. For example, some workers need to make time to look after their family, such as one worker who specifically "works part time because I have young children and need to take care of them." Others need the hours to work and go to school at the same time.

Other salon workers are given part-time hours due to recent structural changes based on pandemic-related shifts in customer flow at the salon. One salon worker said, "If there are times when there are no customers in the appointment book, or walk-in customers are very few, then they will let us take more time off or work fewer hours." In other words, the drop-in appointments have also made employment in the industry less reliable and more part time.

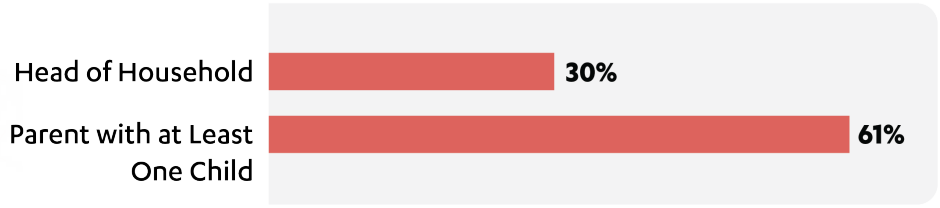
Figure 9: Full-Time and Part-Time Work, 2021



Source: American Community Survey 5-Year Sample 2017–2021

This issue is particularly salient as many nail salon workers depend on their nail salon income to support their families. Almost a third of nail salon workers were heads of households, and about two out of three of workers had at least one child in their household.

Figure 10. Household Composition Among Nail Salon Workers



Source: American Community Survey 5-Year Estimates 2017–2021

Ensuring Accessible Language and Workforce Development

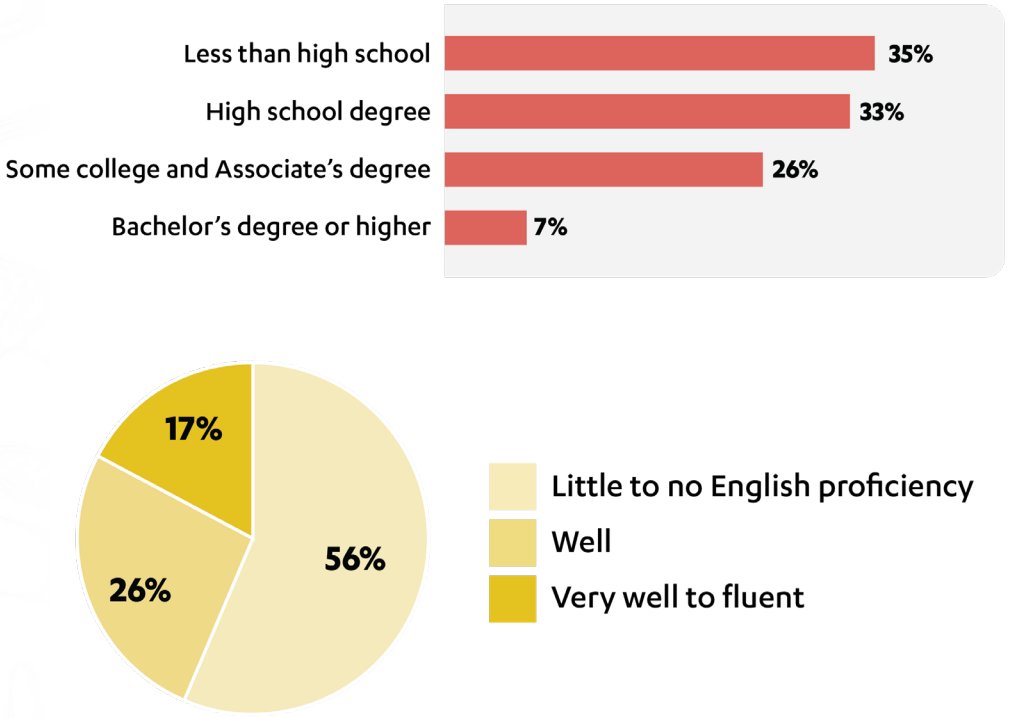
More than half of nail salon workers had a U.S. high school education or more, with one-quarter of salon workers having some college and associate's degree level. Over a third had less than a high school education. Among nail salon workers not born in the U.S., more than half spoke little to no English. A little more than a quarter spoke English well and about 17% were very fluent in English.

The lack of requirement for an educational degree demonstrates one sense of easy entry, yet nail salon workers still need to meet professional licensing requirements including instruction, training hours, written exam, and practical exam. Even after that, nail salon workers need to stay on top of new skills from emerging trends and products. Nail salon workers in the focus groups described how they receive training for the job through a beauty school and/or

subsequently from a salon owner, experienced staff at the salon, friends, or even online through tutorials on YouTube. For example, one salon worker said, "In my shop, at first, the owner instructs [us]."

Another nail salon worker elaborated on this point with an emphasis on a salon's style: "When a new technician joins, they usually follow the salon's specific way or style. The owner or the experienced staff will train the new person to adhere to the salon's way of doing things. So that when this person is absent, someone else can take over." In part, the training received at the salon is based on teaching a specific salon's approach to a nail art, but in other examples, the training focuses on achieving consistency across workers, implying the replaceability of a nail salon worker in their short- or long-term absence.

Figure 11. Educational Attainment and English Language Proficiency, 2021



Source: American Community Survey 5-Year Estimates 2017–2021

Ensuring Health and Safety for Workers and Consumers

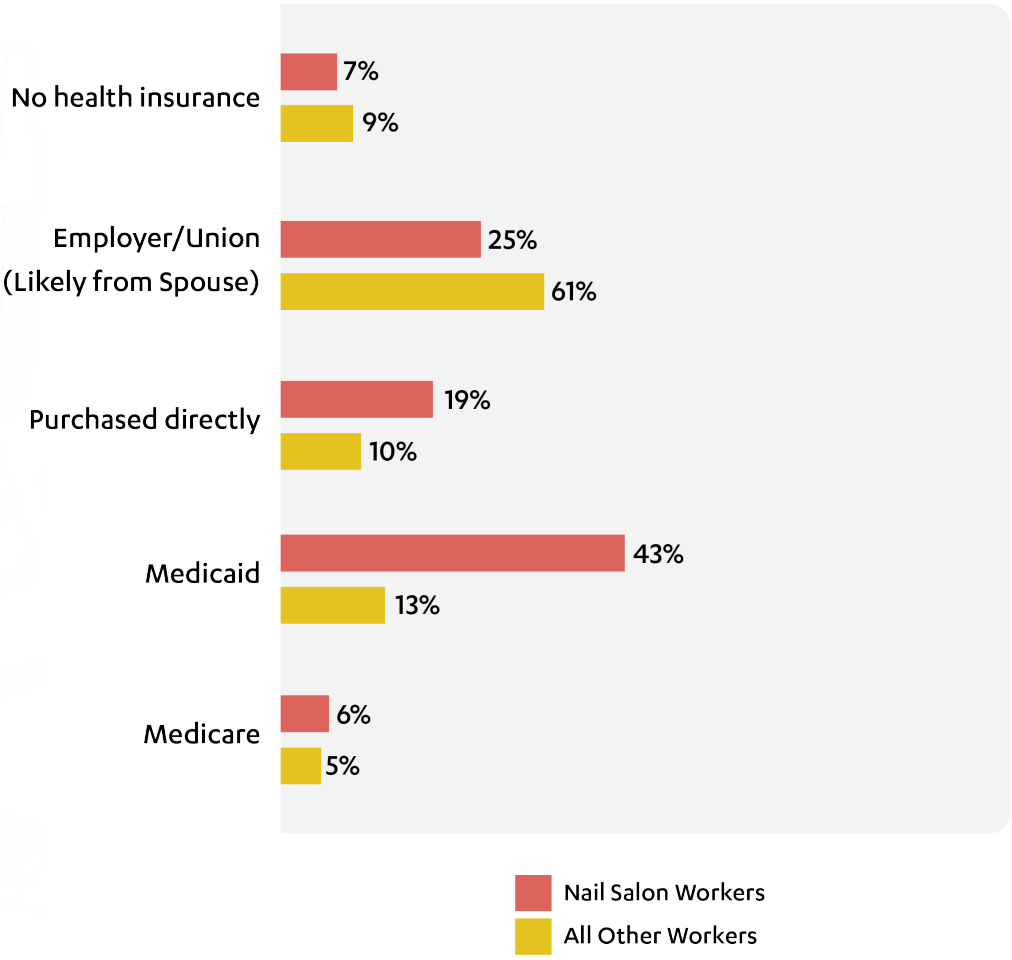
Health—in terms of exposure, benefits, and access to insurance—remains a key issue in the industry. Workers described the contradiction of health conditions in the industry, where they are exposed to toxins at the workplace, against the lack of sick days: "Working in an environment with a lot of chemicals or other things, [...] maybe they can give one day of sick leave per month. That would be a benefit."

The overwhelming majority of nail salon workers (93%) had some form of health insurance, a rate higher than all other workers in California (91%). Of those with health insurance, 43% received coverage through Medicaid (also known as Medi-Cal in California), compared to only 13% of all other workers. Data shows that about a quarter of nail salon workers received their insurance from employers compared to 61% of all other workers; however, nail salon owners rarely offer employer-based health insurance, so we conclude that this is likely from coverage from a spouse's employer. Taken together, nail salon workers are more likely to rely on public programs rather than privatized sources.

Despite these numbers, nail salon workers in the focus groups described how not all nail salon workers have access to health insurance, especially those who are part time. They want to see changes in the industry for more health benefits as one worker noted how "part-time workers don't have health insurance." A 2023 phone survey done by the California Healthy Nail Salon Collaborative revealed the impact of the lack of benefits, as 65% of workers surveyed did not receive paid time off when they were sick or needed to care for a sick family member.[33]



Figure 12. Nail Salon Workers and Types of Health Insurance, 2021



Source: American Community Survey 5-Year Estimates 2017–2021

Health and safety is also a top concern for consumers. In our survey, consumers identified cleanliness and hygiene as the top factors when choosing which salon to visit. Other key considerations included the quality of service, friendliness of staff, and positive online reviews. Less important factors are the convenience of location, use of less toxic products, low price of service, inviting decor/ambience, and parking availability.

Owners also reflected on why customers come to their salon, from cleanliness to safer products. One owner described that "many of my customers have said, 'I like coming to this salon because it feels clean, and it meets the standards of a Healthy Nail Salon.'[34] Regarding my salon, customers often mention that, and I believe it's one of the reasons why my salon has been in business for nearly 20 years." Another owner added a sense of their healthy environment and even extended it to staff attitude:



Firstly, it must have healthy products. Secondly, it must have a healthy environment. Within the healthy environment, there are two aspects. Firstly, the salon must be clean and well ventilated, very spacious and airy. That is the first point in the environment. The second point is that those working together must be joyful, so don't wear a stern face or a face that has two bullet-shaped eyes [Vietnamese expression coined by Trinh Cong Son]. Customers are very demanding. That's the healthy environment, and there are two aspects therein. The third point is that besides that, we must be friendly to customers, we must socialize with them. Don't just bow down your head and work in silence, that's it.

Owners saw offering a healthy environment for customers as a priority, and understood health in multiple ways.



5. Exploring Policy Interventions

Policy Landscape

In California, nail salon workers' rights, such as minimum wage and the right to meals and rest breaks, are governed by federal and state statutes and regulations, federal and state court decisions, and local ordinances. As discussed in the previous sections of the report, nail salon workers too often do not receive the legally mandated state or local minimum wage and are often misclassified as "independent contractors," thereby missing out on other important workplace protections and benefits.

The range of labor violations and occupational health hazards that nail salon workers experience are directly related to the strength of existing labor laws and enforcement and owners' knowledge of and compliance with those laws. The relevant state agency generally depends on workers filing complaints in order to pursue actions against violating employers. Unfortunately, but understandably, workers are hesitant to file claims for fear of losing their jobs or because the process is too intimidating to this community of predominantly Vietnamese-speaking low-wage workers. In 2017, the California Department of Industrial Relations (DIR) contracted with the Labor Occupational Health Program (LOHP) at University of California, Berkeley to conduct research with nail salon workers and owners, and found that workers and owners lacked information about labor laws.[35]

California has several regulatory agencies and boards that are responsible for ensuring fair, healthy, safe, and dignified workplaces, including in nail salons, including the following:

- **California Board of Barbering and Cosmetology (BBC):** Oversees and provides licenses to nail salon workers; conducts inspections; and provides educational materials, complaint forms, and workers' rights information, accessible in multiple languages. Its overall mandate is to ensure that the services provided by licensed salons, barbershops, and spas are safe for consumers.[36]

- **California Department of Industrial Relations**
  - **Division of Labor Standards Enforcement (DIR/DLSE):** Educates workers and employers about employment rights; enforces wage and hour and other labor laws; combats wage theft and retaliation; and manages wages and hour complaints.[37]
  - **Division of Occupational Health and Safety (Cal/OSHA):** Addresses exposure to hazardous products; and conducts relevant research and makes rules and recommendations on health and safety requirements for industries and their workers.[38]

- **Division of Workers' Compensation:** Monitors and administers workers' compensation claims for workplace injuries; and provides judicial services to assist in resolving disputes. Its mission is to minimize the negative impact of workplace injuries on California employees and employers.[39]

- **California Environmental Protection Agency (CalEPA)**
  - **Safer Consumer Products (SCP) Program in the Department of Toxic Substances Control (DTSC):** DTSC's SCP Program's mission is to advance the design, development, and use of products that are chemically safer for people and the environment. To date, the program has targeted toluene, which has been a significant ingredient in nail polish, and is considering regulatory action with respect to methyl methacrylate in nail products, as well as other chemical/product combinations.[40]

- **California Department of Public Health**
  - **CA Safe Cosmetics Program in the Division of Environmental and Occupational Disease Control:** Collects information on hazardous and potentially hazardous ingredients in all cosmetic products sold in California and makes this information available to the public.[41] Consumers and salon workers everywhere can use the CSCP database – https://cscpsearch.cdph.ca.gov/search/publicsearch – to learn more about the products they use.

In the last decade, there have been a number of advances on the legislative level concerning issues of health, equity, and right to know. Additionally, in terms of labor, legislation cosponsored by the California Healthy Nail Salon Collaborative (CHNSC) and NGO partners has sought to address issues concerning workers' wage and hour protections and education of the nail salon community. Since 2016, state law has required the BBC's curriculum to include a section on labor law rights like minimum wage (AB 2025 [Gonzalez]), and salon employers have been required to hang a poster developed by the DIR describing basic labor laws (AB 2437 [Ting]). (For a more detailed description of these bills and others referred to in the next paragraphs, see Appendix C, Legislative Advancements.) Other bills have improved workers' and owners' right to know about chemical ingredients in salon products by requiring that Safety Data Sheets be translated into several languages, including Vietnamese (AB 647 [Kalra 2019]), and that ingredients be listed on the label as of professional products (AB 2775 [Kalra 2018]).

In 2019, Assemblymember Gonzalez authored AB 5 to clarify who is an "employee" eligible for a range of worker protections and who is an "independent contractor." It contained carve-outs for BBC licensees. It is set to sunset for manicurists in January 2025. (See AB 5/AB 2257).

There have been advancements in making cosmetic products, including nail products, less toxic. Recent state bills ban some of the most hazardous chemicals from cosmetic products, including dibutyl phthalate (DBP) and formaldehyde, which were prevalent in nail and hair salon products (See AB 2762 [Muratsuchi et al. 2020]). One bill of great significance has improved cosmetics regulations federally for better health and safety. Among other things, the Federal Modernization of Cosmetics Regulations Act of 2022 (MOCRA) requires formal Food and Drug Administration (FDA) registration of cosmetic facilities, products, and ingredients, and gives the FDA the urgent authority it needs to recall cosmetic products that are harming human health.

The CHNSC and NGO partners advocated for accessible and translated educational materials with government agencies, such as a nail salon page webpage on the federal OSHA website – https://www.osha.gov/nail-salons – developed as a result of a collaboration with the White House Initiative on Asian Americans and Pacific Islanders (WHIAAPI).

Important Programs to Make Nail Salons Healthier

Healthy Nail Salon Recognition Programs

- In 2010, the CHNSC launched the Healthy Nail Salon Campaign to organize nail salon workers towards establishing Healthy Nail Salon Recognition Programs (HNSRP) throughout the state.[42] Through HNSRPs, local jurisdictions recognize nail salons that adopt practices to reduce worker and customer exposure to harmful chemicals. These programs are now established in Alameda, San Francisco, Santa Clara, and San Mateo Counties.
- The Department of Toxic Substances Control (DTSC) also established a statewide Healthy Nail Salon Recognition Program pursuant to AB 2125 (Chiu 2016), which was co-sponsored by the CHNSC and Asian Health Services.[43] In conjunction with existing local HNSRPs and the CHNSC, DTSC developed statewide guidelines for nail salons who want their salons to exceed the minimum requirements for protecting the health and safety of their workers and customers. DTSC issued these guidelines to help ensure that the requirements for nail salons who participate in locally-administered recognition programs are consistent throughout the state. Additionally, DTSC has released outreach material for program implementation, training of nail salon staff, and customer education programs.

California Workplace Outreach Project

The California Workplace Outreach Project provides funding for community-based organizations throughout California to educate and outreach to workers about the impacts of COVID-19 in the workplace, workplace health and safety laws, paid sick leave benefits rights, and employee protections. This program is funded by the California Department of Social Services, the California Department of Public Health and the Labor and Workforce Development Agency.[44]

Los Angeles County Public Health Council Program

The Los Angeles County Department of Public Health created the Public Health Council Program, where workers educate their coworkers about the importance of implementing COVID-19 safety protocols in the workplaces.[45] The program contracts with community based organizations to conduct outreach, education, and technical assistance to workers about workplace safety. It has since evolved to conduct peer-to-peer education about improving overall workplace health and safety so that workers can take action to address unhealthy workplace conditions.

Policy and Program Models for Consideration in the Future

Two worker-centered participatory models exist in California that are either initiatives from statewide agencies or are implemented through legislation: the High Road Training Partnerships (HRTPs) and sectoral boards. Both models recognize the worker as a whole person, whose health, safety, and well-being are impacted by factors within and outside the workplace; both models also convene stakeholders and even the public to change workplace conditions and increase worker participation in shifting industry standards.[46]

HRTPs are grant-based training partnerships in conjunction with the California Workforce Development Board (CWDB). In operation, they include an industry-based and worker-centered training partnership among employers, workers, and worker representatives on a long-term basis to create "high road" strategies and practices that encompass equity, job quality, and climate resilience. In terms of the nail salon sector, HRTP values can help develop inclusive leadership within the collaborative partnership; they can also create worker-centered ways to holistically address workers' priorities. HRTPs can also find solutions to race and gender disparities in worker training and programs.

Sectoral boards are convened by state or local jurisdictions. They bring together workers, employers, and other stakeholders, such as an external government or public representative, to develop industry-specific labor standards that address wage floors, workplace policies, and benefits. One form of sectoral boards is a wage board, which focuses on wage assessments and raising the wage floor; the other, a labor standards board, focuses on prices and other broader industry issues. In terms of the nail salon industry, sectoral board processes can help bring together a range of representatives, they can engage the broader community in the form of hearings or testimonials and comments, and they can promote consensus building and methods of decision-making.

Labor Agency Partnerships with Community Organizations

The state provides a funded partnership with community-based organizations that provide education and outreach efforts to workers in their sectors.

The California Domestic Workers Coalition and the Domestic Worker and Employer Education Outreach Program (DWEOP): The California Domestic Workers Coalition (CDWC) partnered with 15 community organizations and the Department of Industrial Relations (DIR) to launch a three-year pilot program, called the DWEOP, to address wage theft and other prevalent workplace violations (the programs has been recently renewed for another five years). The program involved coordination among the partner organizations to develop programming, conduct training and consultations, coordinate outreach, and work with member leaders and worker bases to educate workers and employers about their labor rights and responsibilities. As "trusted messengers," partner organizations mobilized their years of experience and expertise working with community members to advance domestic workers' rights. DWEOP took a multipronged approach to defend domestic workers' rights and enforcement in workplaces.

Strategic Enforcement Partnerships Program: The California Labor Commissioner's Office created the California Strategic Enforcement Partnership in 2016 to bolster anti-wage theft enforcement and a culture of labor law compliance across the state by partnering with worker organizations. Its goals include collecting unpaid wages, improving the use of agency and legal tools to collect wages, and increasing worker engagement by advocating for better working conditions.



6. Recommendations

The following are recommendations to ensure knowledge of labor protections and standards and to advance policies and practices that create environmentally safe, healthy, and fair salons for workers and consumers alike.

1. **Ensure labor protections and quality jobs for nail salon workers through state programs and agency enforcement.**
   - › Safeguard worker wages and benefits, such as minimum wage, overtime pay, paid sick leave, and meal breaks, through enforcement of labor laws.
   - › Address issues of misclassification, where employees are incorrectly categorized as independent contractors.
   - › Address barriers to filing claims by considering new approaches, such as Vietnamese and other language-accessible tip lines to report nail salon labor, safety, or health violations.
   - › Create continuing education programs and pathways for workers to increase their skill sets and provide opportunities for wage increases.
   - › Create government-community partnerships that conduct joint enforcement efforts with workers' rights organizations to support nail salon workers.
   - › Address gaps in government data that do not fully capture the experiences and demographics of nail salon workers.

2. **Support workplace protections and enforcement via education and training opportunities.**
   - › Mandate regular training on safety, health, and workers' rights for manicurists and salon owners.
   - › Ensure language justice by conducting outreach and education and by providing language and culturally accessible information on workers' rights and employers' legal responsibilities.
   - › Conduct outreach to the nail salon industry and offer education on implementation of the ABC Test to help employers and workers understand and correctly classify workers as employees.
   - › Support opportunities and incentives for continuing education programs about workplace rights and responsibilities.
   - › Encourage employers to support workers' input and insight towards fostering a workplace that supports labor, safety, and health.

3. **Support high-road employers and nail salons.**
   - › Create multi-stakeholder and government partnerships that result in high-road labor practices.
   - › Conduct comprehensive education and outreach programs that include labor and workers' rights issues.
   - › Create trainings to assist salon owners in developing high road infrastructure (e.g., environmentally sustainable, how to address good pay, scheduling, and benefits for workers).
   - › Support and recognize owners who provide opportunities for workers to earn a living or better wage.
   - › Create industry-specific incentives, programs, and grants for salon owners on how to run sustainable, healthy, and just businesses.
   - › Educate nail salon consumers on why it is important to pay a fair price for nail services.

4. **Support health and safety of nail salon workers.**
   - › Expand Healthy Nail Salon Recognition Programs across California. Raise awareness about safer products and practices, provide health and safety trainings that are culturally and language appropriate, and provide informational materials to reduce worker exposure to harmful chemicals.
   - › Research expansion of worker benefits in nail salons that improve job quality, such as hazard pay.
   - › Require cosmetic manufacturers and distributors to conduct further studies and identify hazardous chemicals on labels of nail salon products, and ultimately remove harmful chemicals from their products.



Appendix A: Methodology

Worker Estimates

To understand nail salon worker counts, we used the following government datasets:

- U.S. Census Bureau, American Community Survey (ACS) 5-year estimate 2017–2021, and IPUMS-USA extract of the American Community Survey. We used the occupational variable, 4521 - Personal Care Services -Manicurists and Pedicurists, and limited it to only occupations in the industry, 8990 - Nail Salons and other personal care services. These data were limited to California only.
- County Business Patterns 2021. We used NAICS Code 812113 - Nail Salons and limited it to California only.
- California Board of Barbering and Cosmetology Licenses 2023, Manicurists, Current License.

Worker Characteristics

We used the U.S. Census Bureau American Community Survey 5-year estimate 2017–2021 to gather worker characteristics such as economic status, demographics, and health and social benefits. We included workers and self-employed individuals who are currently employed over the age of 16 years old and living in the United States (excluding the labor force and unemployment data points).

Low Wages

We computed the hourly wage variable for the ACS following the steps outlined by the UC Berkeley Labor Center.[47] We calculated the median wage for full-time workers in California at $25.62, using the 2017–2021 ACS 5-year sample. Following the UC Berkeley Labor Center's methods, we define workers as low-wage if they earn less than two-thirds of the full-time median wage.[48] For California, the cutoff is $17.08.

Consumer Survey

We sampled a panel of 505 participants using Qualtrics. Consumers included Californians aged 18 years and above who had received services at a nail salon within the past three months. Responses were collected in June 2023. The consumer survey covered topics such as types of services received, amount of payment for services, tipping amount and behavior, frequency of visits to salons, factors that influence choosing a salon, and willingness to pay extra for workforce development and better labor conditions for salon workers. (See Appendix B for consumer survey data tables.)

Industry Data

For industry data, we used the NAICS 812113 Nail Salon Industry category and included data from the following data sources:

- U.S. Census Bureau, County Business Patterns 2011–2021
- U.S. Small Business Payback Protection Program (PPP) Loan Data 2021

Focus Groups

We conducted virtual focus groups via Zoom with nail salon workers and owners across California. The main purpose was to explore and understand conditions in the nail salon industry and explore possible solutions. Participants were recruited by the California Healthy Nail Salon Collaborative. There was one focus group for owners (n=7) and one for workers (n=8). For both groups, about half of the participants worked in Northern California and the other half worked in Southern California. The groups were facilitated by Tony Nguyen and Vy Tran, frontline staff from the Collaborative. Tony and Vy have long-standing relationships with many of the participants, which fostered high rapport and led to rich qualitative data. Tony and Vy conducted the groups entirely in Vietnamese, which was the preferred language for all participants. A native Vietnamese-language speaker, Ngô Thành Nhân, transcribed and translated the focus group conversations into English. Two members of the research team, Preeti Sharma and James Huỳnh, conducted thematic analyses of the transcripts, which included coding the transcripts on Dedoose. Quotes from the focus groups are integrated throughout the report to provide nail salon workers' perspectives alongside the statistical data.



Appendix B: Consumer Survey Data Tables

We conducted a consumer survey with 505 respondents to understand consumer choices when engaging with the nail salon industry in California. The following data tables summarize survey findings.

Table 9: Consumer Characteristics

Age	Percent
18–24	33%
25–34	29%
35–44	21%
45–54	8%
55–64	5%
Above 65	3%

Gender	
Man	22%
Woman	76%
Transgender	<1%
Non-binary/gender non-conforming/gender queer/third gender	<1%
Race/Ethnicity	
Asian	11%
Black or African American	11%
Hispanic or Latinx	23%
Native American, American Indian, or Alaska Native	1%
Native Hawaiian or Pacific Islander	1%
White	38%
Two or more races	14%
Other	1%
Education	
High school diploma or equivalent (e.g. GED)	26%
Associate's or some college	33%
Bachelor's	23%
Master's degree or higher	18%
Household Income	
Less than $25,000	11%
$25,000–$49,999	22%
$50,000–$99,999	32%
$100,000–$149,999	19%
$150,000–$199,999	9%
$200,000 or more	7%

Consumer Practices

Table 10: Type of Service Received During Last Nail Salon Visit

Service	Percent
Manicure	39%
Pedicure	26%
Mani-pedi	35%
Total	100%

Table 11: Detailed Look at Services and Add-ons Received

Service or Add-On	Percent
Gel polish	52%
Acrylic	40%
Basic manicure and/or pedicure	26%
Nail art	28%
Dip powder	14%
Other	2%

Table 12: Median Price for Services

Type of Service	Median Price
Manicure	$50
Pedicure	$45
Mani-pedi	$77

Table 13: Median Tip for Services

Service	Median Price
Manicure	$10
Pedicure	$5
Mani-pedi	$10

Table 14: Have Nail Salons Increased Prices?

	Percent
No	12%
Maybe/Unsure	34%
Yes	54%

Table 15: Consumers' Perspectives on Why Nail Salons Increased Prices

Labor costs	27%
Supplies cost	36%
General inflation	37%
COVID pandemic costs	28%



Appendix C: Legislative Advancements

- **AB 2437 (Ting 2016):** AB 2437 requires that nail salon owners post an advisory developed by DIR in their salons regarding labor law protections for workers licensed by the BBC.[49]
- **AB 2025 (Gonzalez 2016):** Requires that the BBC create a "know your rights" curriculum for their licensees. That curriculum and all other written materials must be accessible for licensees and applicants in English, Korean, Spanish, and Vietnamese.[50] AB 2025 also requires BBC licensed business owners and licensees to provide electronic acknowledgement of their understanding of basic labor laws and practices for both renewal or initial licensures. Sponsored by the CHNSC.
- **AB 2775 (Kalra 2018):** Require that professional cosmetics, except fragrances, have ingredient labels.[51] This bill brought labeling for professional cosmetics into parity with federal law for cosmetics sold on the retail market. It was co-sponsored by the CHNSC, Women's Voices for the Earth, Black Women for Wellness, and Breast Cancer Prevention Partners.
- **AB 647 (Kalra 2019):** Requires manufacturers to post their cosmetic and disinfectant products' Safety Data Sheets (SDS) to their websites and translate each SDS into Spanish, Vietnamese, Chinese, and Korean.[52] The current law had already required SDSs to be available in English at workplaces. It was co-sponsored by the CHNSC and Worksafe.

- **AB 5 (Gonzalez 2019):** Addresses workers' employment status in California. AB 5 requires the application of the "ABC test" to determine if a worker in California is an employee or an independent contractor for purposes of minimum wage, workers' compensation, and other labor protections.[53] The ABC test creates the presumption that a worker is an employee unless the business owner can show, among other things, that "the person performs work that is outside the usual course of the hiring entity's business."
- **AB 5 (and later AB 2257 - Gonzalez 2020):** Added a new article to the Labor Code addressing employment classification.[54] It creates a carve-out or an exception for manicurists and other professionals licensed by the BBC. It also establishes criteria that must be met for those professionals to be considered an independent contractor by a salon or shop owner, including that they set their own rates, process their own payments, be paid directly by clients, and maintain their own business license. This Labor Code provision is due to sunset for manicurists in January 2025. At that time, the employment status of BBC-licensed manicurists will be completely controlled by the ABC test in the Dynamex court decision.
- **AB 2762 (Muratsuchi, Wicks, Quirk, 2020):** AB 2762 bans 24 toxic ingredients, including dibutyl phthalate (DBP) and formaldehyde from cosmetic products Californians use every day and on the job.[55] DBP and formaldehyde have historically been used in nail and/or hair products.

Acknowledgements

Research team:

California Healthy Nail Salon Collaborative: Lisa Fu, Dung Nguyen, Mary Nguyen, Tony Nguyen, Catherine Porter, Vy Tran, Phuong Vo

California State University, Long Beach: Preeti Sharma

UCLA Labor Center: James Huynh, Alex Nguyen, Lucero Herrera, and Saba Waheed

Funding:

AAPI Data project at the University of California, Riverside through its allocation of the State of California's API Equity Budget

Communications:

Emily Jo Wharry, UCLA Labor Center
Nina Ho, California Healthy Nail Salon Collaborative

Copy editor:

Hilarie Ashton

Design:

Eunice Ho

Photography:

Joyce Xi , Wil Prada

Additional Thank-Yous:

Nora Moran, Associate Professor, Department of Marketing, California State University, Northridge

Citation:

Huynh, J., Sharma, P., Waheed, S., Fu, L., Herrera, L., Nguyen, M., Porter, C. (2024). Nail Files California: A Study of Nail Salon Workers and Industry. UCLA Labor Center and California Healthy Nail Salon Collaborative.

CC BY NC ND

Endnotes

1 Sharma, P., Waheed, S., Nguyen, V., Stepick, V., Orellana, R., Katz, L., & Kim, S. (2018). *Nail Files: A Study of Nail Salon Workers and Industry in the United States*. Los Angeles, CA: UCLA Labor Center 37. https://www.labor.ucla.edu/wp-content/uploads/2018/11/NAILFILES_FINAL.pdf; Willett, J. (2005). "Hands Across the Table: A Short History of the Manicurist." *Journal of Women's History* 17(3), 59–80. doi:10.1353/jowh.2005.0038; Pham, A. F., Ray, I. A., & Pham, K. S. (Producers), & Pham, A. F. (Director). (2018). Nailed It [Motion picture] USA.; Statista. (2017). "Revenue of Nail Salons (NAICS 812113) in United States from 2008 to 2020 (in Million U.S. Dollars)." Retrieved from https://www.statista.com/forecasts/409855/united-states-nail-salons-revenue -forecast-naics-812113

2 Sharma et al, *Nail Files*, 39.

3 Goldin, L. J., Ansher, L., Berlin, A., Cheng, J., Kanopkin, D., Khazan, A., . . . & Allen, J. G. (2014). "Indoor Air Quality Survey of Nail Salons in Boston." *Journal of Immigrant and Minority Health*, 16(1), 508–514. doi:10.1007/s10903–013–9856-y; Harris-Roberts, J., Bowen, J., Sumner, J., Stocks-Greaves, M., Bradshaw, L., Fishwick, D., & Barber, C. M. (2011). "Work-Related Symptoms in Nail Salon Technicians," *Occupational Medicine*, 61(5), 335–340. doi:10.1093/occmed/kqr096; Roelofs, C., & Do, T. (2012). "Exposure Assessment in Nail Salons: An Indoor Air Approach." *International Scholarly Research Notices* (Network Public Health, 2012). doi:10.5402/2012/962014; White, H., Khan, K., Lau, C., Leung, H., Montgomery, D., & Rohlman, D. (2015) "Identifying Health and Safety Concerns in Southeast Asian Immigrant Nail Salon Workers." *Archives of Environmental & Occupational Health* 70(4) 196–203. doi:10.1080/19338244.2013.853644; Bernhardt, A., Milkman, R., Theodore, N., Heckathorn, D., Auer, M., DeFilippis, J., . . . Spiller, M. (2009). *Broken Laws, Unprotected Workers: Violations of Employment and Labor Laws in America's Cities*. https://www.nelp.org/wp-content/uploads/2015/03/BrokenLawsReport2009.pdf; California Healthy Nail Salon Collaborative & UCLA Labor Occupational Safety and Health Program. (2018). Unpublished survey data.

4 Herrera, L., Waheed, S., Macias, M., Fu, L., Nguyen, T., Nguyen, D. (2021). *Reopening During COVID-19: The Experience of Nail Salon Workers and Owners in California*. California Healthy Nail Salon Collaborative and UCLA Labor Center.

5 Sharma, P., Waheed, S., Nguyen, V., Stepick, V., Orellana, R., Katz, L., & Kim, S. (2018.) *Nail Files: A Study of Nail Salon Workers and Industry in the United States*. Los Angeles, CA: UCLA Labor Center:, 37. https://www.labor.ucla.edu/wp-content/uploads/2018/11/NAILFILES_FINAL.pdf

6 Willett, J. (2005). "Hands Across the Table: A Short History of the Manicurist." *Journal of Women's History* 17(3), 59–80. doi:10.1353/jowh.2005.0038; Pham, A. F., Ray, I. A., & Pham, K. S. (Producers), & Pham, A. F. (Director). (2018). Nailed It [Motion picture]. USA.

7 Statista. (2017). "Revenue of Nail Salons (NAICS 812113) in United States from 2008 to 2020 (in Million U.S. Dollars)." Retrieved from https://www.statista.com/forecasts/409855/united-states-nail-salons-revenue -forecast-naics-812113

8 Sharma et al, *Nail Files*, 39.

9 County Business Patterns 2021. Retrieved January 3, 2024 from https://www.census.gov/programs-surveys/cbp.html; See Sharma et al., *Nail Files*, 38 for U.S. demographics in 2018.

10 See Kang, M. *The Managed Hand: Race, Gender, and the Body in Beauty Service Work* (Oakland, CA: University of California Press, 2010) for further discussion in the intimate labor and body labor of nail salon workers in New York.

11 "Occupational Outlook Handbook: Manicurists and Pedicurists," U.S. Bureau of Labor Statistics, Retrieved October 21, 2023 from https://www.bls.gov/ooh/personal-care-and-service/manicurists-and-pedicurists.htm.

12 Goldin, L. J., Ansher, L., Berlin, A., Cheng, J., Kanopkin, D., Khazan, A., . . . Allen, J. G. (2014). "Indoor Air Quality Survey of Nail Salons in Boston." *Journal of Immigrant and Minority Health* 16(1), 508–514. doi:10.1007/s10903–013–9856-y; Harris-Roberts, J., Bowen, J., Sumner, J., Stocks-Greaves, M., Bradshaw, L., Fishwick, D., & Barber, C. M. (2011). "Work-Related Symptoms in Nail Salon Technicians." *Occupational Medicine* 61(5), 335–340. doi:10.1093/occmed/kqr096; Roelofs, C., & Do, T. (2012). "Exposure Assessment in Nail Salons: An Indoor Air Approach." *International Scholarly Research Notices*. doi:10.5402/2012/962014; White, H., Khan, K., Lau, C., Leung, H., Montgomery, D., & Rohlman, D. (2015). "Identifying Health and Safety Concerns in Southeast Asian Immigrant Nail Salon Workers." *Archives of Environmental & Occupational Health* 70(4), 196–203. doi:10.1080/19338244.2013.853644.

13 Bernhardt, A., Milkman, R., Theodore, N., Heckathorn, D., Auer, M., DeFilippis, J., . . . Spiller, M. (2009). *Broken Laws, Unprotected Workers: Violations of Employment and Labor Laws in America's Cities*. https://www.nelp.org/wp-content/uploads/2015/03/BrokenLawsReport2009.pdf.

14 California Healthy Nail Salon Collaborative & UCLA Labor Occupational Safety and Health Program (2018). Unpublished survey data.

15 Herrera, L., Waheed, S., Macias, M., Fu, L., Nguyen, T., Nguyen, D. (2021). *Reopening During COVID-19: The Experience of Nail Salon Workers and Owners in California*. California Healthy Nail Salon Collaborative and UCLA Labor Center.

16 Do, A. (2020, June 6) "Coronavirus did not spread first from a nail salon. Now when can shops reopen?" *LA Times*, https://www.latimes.com/california/story/2020-06-06/coronavirus-community-spread-nail-salon-reopening.

17 Workers who perform manicures and pedicures may do so through a state licensing process as a manicurist, and someone licensed as a cosmetologist can do hair, skin, and nail services. Using the category of "cosmetologists" for data analysiswould capture those who perform manicuring services, but the data sources group them with barbers and hairstylists. Thus, there are several sources to get an estimate of the number of nail salon workers in California. Within the beauty service industry and even in the nail salon, there are other occupations, like those who perform hair removal services, give massages, or work at a reception desk. Those occupations are outside of the scope of this study.

18 Here we use the North American Industry Classification System (NAICS) category 812113 - Nail Salons.

19 To further understand this, according to California Board of Barbering and Cosmetology (BBC) estimates, there are 127,480 active manicurist licensees. The U.S. Census American Community Survey (ACS) has a broader category of "personal appearance workers" that include manicurists but also other occupations; they estimate 36,393 nail salon workers. County Business Patterns (CBP) estimates 22,297 nail salon workers. These differences in estimates point to the limitations of government data for this particular industry. Given the sizable difference between the BBC estimates and the others, we believe that federal government statistics are most likely undercounting nail salon workers. An undercount could also be due to the manicurists who are independent contractors and not employees, or salons that are unregistered, unlicensed workers, and undocumented workers.

20 We analyze 11 counties here because the top 10 counties for nail salon workers and the top 10 counties for nail salon owners differ by one county.

21 U.S. Bureau of Labor Statistics, Labor Force Statistics from the Current Population Survey, Employed persons by detailed industry, sex, race, and Hispanic or Latino ethnicity, https://www.bls.gov/cps/cpsaat18.htm

22 U.S. Bureau of Labor Statistics, Labor Force Statistics from the Current Population Survey, Employed persons by detailed occupation, sex, race, and Hispanic or Latino ethnicity, https://www.bls.gov/cps/cpsaat11.htm

23 In March of 2020, the Paycheck Protection Program (PPP) was established as part of the CARES Act (Coronavirus Aid, Relief and Economic Security Act). The aid was provided in the form of business loans that helped small businesses keep their workers on payroll. Overall, funds were used to pay for payroll costs, benefits, mortgage interests, rent, utilities, protection for workers in relation to COVID-19, property damage not covered by insurance, and some costs and expenses for operation. We provide an analysisof PPP data compiled by the Project on Government Oversight (POGO) up to August 2021. The data includes workplace and loan information as well as recipient characteristics.

24 The PPP loan demographic data contained a lot of unanswered responses. The percentages that we present here only account for answered responses.

25 According to the U.S. Census Bureau, "An establishment is a single physical location at which business is conducted or services or industrial operations are performed. An establishment is not necessarily equivalent to a company or enterprise, which may consist of one or more establishments." Therefore, a company will consist of one or more establishments, such as a franchise. See https://www.census.gov/programs-surveys/cbp/technical-documentation/methodology.html

26 The American Community Survey does not provide hourly wage data, so we calculated using three variables: annual earnings from wages, usual hours worked per week over the previous year, and number of weeks worked over the previous year.

27 According to the U.S. Department of Housing and Urban Development, rent-burdened is defined as paying more than 30% of one's monthly income towards rent. Severely rent-burdened is defined as paying more than 50% of one's monthly income towards rent. See "Rental Burdens: Rethinking Affordability Measures." HUD USER. https://www.huduser.gov/portal/pdredge/pdr_edge_featd_article_092214.html

28 The variables selected for overcrowding include the number of person records that are included in the sampled unit and the number of whole rooms used for living purposes that are contained in the housing unit. Using the U.S. Census definition for overcrowding, the variable created for the current report consists of two categories: 1) Overcrowded, which is defined as a unit or room occupied by more than one person, excluding bathrooms and kitchens, and 2) If there are 1.5 or more persons per room, they are considered to live in severely overcrowded conditions.

29 Stern, C. (2023, March 23). "Artificial nail sales projected to surpass nail polish sales for the first time." *Cosmetics Design USA*. https://www.cosmeticsdesign.com/Article/2023/03/23/trend-report-artificial-nail-sales-will-outperform-nail-polish-in-2023

30 AB 5 in California sought to address issues of misclassification across multiple industries; however, nail salons and other beauty service work received carve-outs. The carve-out of AB5 in 2020 exempted licensed barbers, cosmetologists, and manicurists from these regulations, leaving them vulnerable to misclassification and violations of workers' rights. However, the AB5 exemption sunsets at the end of 2024, and the new independent contractor policy will go into effect in January 2025 just for licensed manicurists.

31 Sierra, S. & Larsen, K. (2020, July 21). "Gov. Gavin Newsom Allows Reopening Outdoor Hair Salons, Nail Salons amid Coronavirus Pandemic." ABC7 San Francisco. KGO-TV. https://abc7news.com/new-guidelines-for-hair-salons-gavin-newsom-press-conferencetoday-salon-outdoor-nail/6325481/. Moon, S. & Wood, D. (2020, December 4.) "California Issues Regional Stay-at-Home Order to Battle Record Covid-19 Surge." CNN. https://www.cnn. com/2020/12/03/us/los-angeles-hospital-beds-christmas-covid/index.html.

32 Herrera,L., Waheed, S., Macías, M., Fu, L., Nguyen, T., & Nguyen, D. (2021). Reopening During COVID-19: The Experience of Nail Salon Workers and Owners in California (Los Angeles, CA: UCLA Labor Center, 2021), 11.

33 Over the months of July 2023 and September 2023, the California Healthy Nail Salon Collaborative (CHNSC) staff called 1,523 people; the question asked was "Do you receive paid time off for when you're sick or caring for a sick family member?" which was part of an unpublished report.

34 For a description on the Healthy Nail Salon Recognition Program in California, see Section 6.

35 California Labor and Workforce Development Agency and Department of Industrial Relations. (2017). Report on Labor Law Violations in the Nail Salon Industry.

36 California Board of Barbering and Cosmetology. (2022). "Responsibilities". https://www.barbercosmo.ca.gov/about_us/responsibilities.shtml

37 California Labor Commissioner's Officer. (2024). https://www.dir.ca.gov/dlse/

38 California Division of Occupational Health and Safety. (2023). "Cal/OHSA Enforcement Branch". California Department of Industrial Relations. https://www.dir.ca.gov/dosh/Enforcementpage.htm

39 California Division of Workers' Compensation. (2024). California Department of Industrial Relations. https://www.dir.ca.gov/dwc/

40 California Department of Toxic Substances Control. (2024). "Program Overview - Safer Consumer Products". https://dtsc.ca.gov/scp/safer-consumer-products-program-overview/

41 California Safe Cosmetics Program. (2022). "About CSCP". California Department of Public Health. https://www.cdph.ca.gov/Programs/CCDPHP/DEODC/OHB/CSCP/Pages/About-CSCP.aspx

42 California Healthy Nail Salon Collaborative. (n.d.). "Healthy Nail Salons". https://www.cahealthynailsalons.org/healthy-nail-salon

43 California Department of Toxic Substances Control. (n.d.). "Healthy Nail Salon Recognition Program." https://dtsc.ca.gov/scp/healthy-nail-salon-recognition-program/

44 The Center at Sierra Health Foundation. (2022). "California COVID-19 Community Health and Workplace Outreach Project." https://www.shfcenter.org/programs-and-initiatives/covid-19-response-for-our-communities/california-covid-19-community-health-and-workplace-outreach-project/

45 Los Angeles County Department of Public Health. (2022). "Frequently Asked Questions About Public Health Councils". http://www.publichealth.lacounty.gov/media/Coronavirus/phcouncils/FAQ_Public_Health_Councils_July2022.pdf

46 For more information on these strategies, see Sharma, P., Herrera, L., Areza, J., Waheed, S., Fu, L., Gonzalez-Vasques, A.L., Lopez, M.N., & Nguyen, J. (2023.) *Nailing New Labor Models: Exploring Sectoral Boards and High Road Training Partnerships in the Nail Salon Sector* (Los Angeles: California Healthy Nail Salon Collaborative and UCLA Labor Center, 2023). https://www.labor.ucla.edu/publication/nailing-new-labor-models/

47 See methods outlined in Welsh-Loveman, J., Perry, I. E., & Bernhardt, A. (2014). "Data and Methods for Estimating the Impact of Proposed Local Minimum Wage Laws." UC Berkeley Institute for Research on Labor and Employment. https://irle.berkeley.edu/publications/brief/data-and-methods-for-estimating-the-impact-of-proposed-local-minimum-wage-laws/; Bernhardt, A., Perry, I.E., & Cattell, L. (2015, April 30). "Low Wage California: 2014 Data and Methods." UC Berkeley Labor Center. https://laborcenter.berkeley.edu/lowwageca/; and the Economic Policy Institute's "State of Working America" and the Center for Economic and Policy Research.

48 Bernhardt, A., Perry, I., & Cattell, L. (2015). Low-Wage California: 2014 Chartbook. UC Berkeley Labor Center. http://laborcenter.berkeley.edu/pdf/2014/chartbook.pdf.

49 Cal. Assemb. B. 2437, 2015–2016 Reg. Sess. (Cal. 2016). http://www.leginfo.ca.gov/pub/15-16/bill/asm/ab_2401-2450/ab_2437_bill_20160622_amended_sen_v96.pdf

50 Cal. Assemb. B. 2025, 2015–2016 Reg. Sess. (Cal. 2016). http://www.leginfo.ca.gov/pub/15-16/bill/asm/ab_2001-2050/ab_2025_bill_20160418_amended_asm_v97.htm

51 Cal. Assemb. B. 2775, 2017–2018 Reg. Sess. (Cal. 2018). https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB2775

52 Cal. Assemb. B. 647, 2019–2020 Reg. Sess. (Cal. 2020). https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB647

53 Cal. Assemb. B. 5, 2019–2020 Reg. Sess. (Cal. 2020). https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201920200AB5

54 Cal. Assemb. B. 2257, 2019–2020 Reg. Sess. (Cal. 2020). https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB2257

55 Cal. Assemb. B. 2762, 2019–2020 Reg. Sess. (Cal. 2020). https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB2762