NAIL FILES

A STUDY OF NAIL SALON WORKERS AND INDUSTRY IN THE UNITED STATES

UCLA Labor Center

CALIFORNIA HEALTHY NAIL SALON COLLABORATIVE

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Executive Summary 4

Introduction:

The Nail Salon Industry Past and Present 10

Overview of report 10
Inside the Salon 11
History and Growth of Manicuring Services 13
Immigrant Entrepreneurship and Workforce 16

Part 1: Worker Profile 17

Overview of Nail Salon Workers 17

Number of Workers 17
Nail Salon Workers by State 19
Labor Force Participation and Economic Status 20
Wages 22
Race/ Ethnicity, Age, Gender, and Nativity 23
Educational Attainment and Language 25
Benefits and Household 26

Current Issues for Nail Salon Workers 27

Labor Issues 27
Misclassification 29
Barriers to Licensing 31
Health and Safety 32

Part 2: Industry Profile 37

Nail Salons in the United States 37
Industry Revenue, Spending, and Payroll 39
Trends in the Industry 41
Nail Salon Chains 43

Part 3: Industry Oversight and Enforcement 45

Federal and State Regulatory Bodies 45

Challenges in Enforcing Labor Rights 46
Challenges in Enforcing Health and Safety 47

Municipal Programs 48
Legislation and Policies 49
Nail Salon Organizing 50

Recommendations 52

Technical Appendix 54

Acknowledgements 55

Endnotes 56

EXECUTIVE SUMMARY

Nail salons in the United States are a booming multi-billion dollar industry. Due to immigrant and refugee labor and changes in technology, the nail salon industry grew from a high-end, luxury service to an affordable service available to low- and middle-income clients. Nail salons include their predominantly Vietnamese, Korean, Chinese, Nepali, Tibetan, and Latinx immigrant and refugee labor force. These immigrant and refugee communities have not only created economic niches that are unique to the industry but also developed health, labor, and community organizing initiatives that advocate for quality and safe jobs. They continue to shape the parameters of beauty service work, but they are also a key facet of today's service economy, subject to its market forces and labor issues.

While there have been some studies focusing on health and safety conditions in salons, few have explored labor conditions. The UCLA Labor Center launched this study in collaboration with the California Healthy Nail Salon Collaborative to gain a deeper understanding of the nail salon industry through existing literature, policy reports, worker stories and government and other relevant data sources. This is the first report to look at the industry nationally through a labor lens. The report focus on three primary areas: workers, industry, and oversight.

Worker Profile

National data sources estimate there are between 126,300 and 212,519 nail salon workers though this is most likely an undercount. State board data suggests that government sources only account for 33% of certified nail salon workers in California and 47% in New York. Nonetheless, national data do provide a useful profile of workers. The following are key data and issues related to nail salon workers:

- **Nail salon workers have strong participation in the labor workforce.** Most are in the labor force (92%) and the industry has low unemployment (3%). The majority (72%) work full-time and year-round (81%).
- **Self-employment rates are high for nail salon workers.** 30% are self-employed which can include independent contractors, sole proprietors, or members of a partnerships. This rate is three times higher than the national average.
- **The majority of nail salon workers earn low wages.** Nearly 8 in 10 workers earn low wages, defined as 2/3 of the median full-time wage. This rate is significantly higher than the national rate of 33% for all workers.
- **The industry continues to employ a largely immigrant and female workforce.** The industry is predominantly women (81%) and foreign-born (79%), comprised largely of Vietnamese workers. Nearly half of those born abroad have low English proficiency.
- **Most nail salon workers support family members.** A third are heads of households and almost two-thirds have at least one child.
- **The industry faces challenging working conditions.** Small sample studies and investigative reporting have found that wage issues in the industry include low wages, being paid a flat, rather than hourly rate, minimum wage and overtime violations, and harassment and surveillance.
- **Misclassification is a key concern in the sector.** The industry has a high rate of self-employed workers which includes independent contractors. Some workers may be legitimate independent contractors, but there are concerns that many manicurists are purposely misclassified to avoid labor laws and protections.
- **Nail salon workers are at risk for many different short- and long-term occupational health conditions.** Nail salon workers are exposed to hazardous ingredients and materials present in products and salons and are likely to experience work-related ergonomic body pain.

Industry Profile

According to the County Business Patterns, there are an estimated 23,745 nail salons in the United States. Similar to the worker estimates, the number of salons may also be an undercount, as some salons may be unregistered. The following are some key industry trends in the sector:

- **Most salons are small mom-and-pop operations.** The industry is dominated by small salons with 9 out of 10 salons having fewer than 10 employees.
- **Nail salons are a growing and vibrant industry.** Total revenue for nail salons in 2015 reached $4.4 billion, up 15% from the previous year. Over the next decade, employment in the industry is expected to grow by 13%.

- **New developments in cosmetics, fashion, and nail polish technology have set the pace for trends in the nail salon industry.** Nail trends include nail art, gel polish, and dip systems while salon cosmetics ingredients are moving towards more "natural" products. Also, the nail salon industry has been trying to attract male-identifying customers.
- **Social media and digital technology has also affected salons.** Nail art is one of the top five most tagged items on both Pinterest and Instagram. Also, Yelp contributes to salons' customer engagement and management.
- **The gig economy creates on-demand, app-based manicure services.** These salons allow customers to order manicures or pedicures through a cell phone app. The manicurist meets customers where they are, though some workers will only go to workplaces or corporate events.
- **New and large chains are entering the market.** Nail salons have traditionally been mom-and-pop operations, but the sector is seeing some large chains enter the market and/or expand.

Industry Oversight and Enforcement

In the United States, the nail salon workplace is governed by federal and state regulatory bodies, legislation, and other rules; county and local policies and programs; and state and federal court decisions. The following is an overview of some of key areas of oversight and challenges:

- **Various federal and state agencies oversee labor conditions but face challenges in enforcing labor rights.** Challenges include investigations that are complaint-driven rather than investigator-driven,and are filed against owners whom cannot pay judgments. Additionally, workers and employers have a lack of understanding of labor laws, misinformation, a mistrust of investigators, and a lack of employer record keeping.
- **There are also continuing challenges in ensuring safe and healthy conditions in nail salons.** Federal agencies can conduct more research on the environmental effects of chemicals found in nail salon products and push for more legislation, such as those to control toxins that are released into the air. Training about workplace hazards and safety information is inaccessible and many workers are not trained in safe chemical handling.
- **There are many programs in local jurisdictions, with volunteer or elected staff, designed to improve work conditions in nail salons.** Programs like the Healthy Nail Salon Recognition Programs (HNSRP) provide a plan to ensure healthy workplaces including safer nail polishes and products, ventilation, and staff training. Programs may also recognize green business practices in salons and introduce green solutions and alternatives.
- **State legislation and policies have provided improvements in areas such as language rights, labor protections, health and safety protections, and industry standards.** Some examples include ensuring agencies increase staff, provide materials/forms and licensing in languages other than English relevant to working populations, provide workers' rights education for owners and workers, and require cosmetics manufacturers to report chemicals found in their products that are known carcinogens or reproductive toxicants to the California Department of Public Health (CDPH).
- **Nail salon advocacy over the past decade has helped to improve working conditions and provide healthier workplaces.** Many of the efforts to improve nail salon conditions mentioned here have resulted from worker-led, community organizing and advocacy. Two examples include the California Healthy Nail Salon Collaborative (Collaborative) and the New York Healthy Nail Salons Coalition (NYHNSC), and such efforts are bourgeoning across the United States.

Recommendations

Nail salons are a thriving and growing industry shaped by immigrant entrepreneurship and industry innovation. As the industry expands, we must continue to ensure safe and quality jobs for the workforce. The following are recommendations for key stakeholders to ensure labor protections and standards as well as to continue to advance policies and practices that create environmentally safe and healthy salons for workers, employers and consumers alike.

1. Ensure quality jobs and labor protections for nail salon workers.

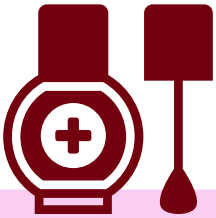
- **Agencies need to safeguard worker wages and benefits,** address issues of misclassification, mandate safety, health, and workers' rights training for employers and address language barriers in materials.
- **Policy makers should expand worker protections and policies** that improve job quality, remove barriers to licensing and address gaps in government data.
- **Advocates should develop a continuing education program** and curriculum that provides workers with the skills to advance.
- **Employers must create pathways for workers** to increase their skill sets and provide opportunities for wage increases.
- **Researchers should provide technical guidance on future research efforts.**

2. Guarantee enforcement of workplace protection.

- **Agencies must support workers' rights** through culturally appropriate worker education, addressing barriers to filing claims, creating model agreements and educational materials for independent contractors to use, and funding community partnerships that are better able to build trust with workers to provide necessary information.
- **Advocates must center workers** by giving them decision-making power, ensuring that organizing initiatives represent the needs of workers, creating multi-stakeholder collaborations and learning best practices from other campaigns, industries, and regions.
- **Researchers must conduct further studies** to better understand working conditions, labor issues, enforcement efforts, and other needs of the sector, particularly experiences not captured in public government data sets.

3. Support high-road businesses and good employers.

- **Agencies should support salon businesses** by creating programs on how to run financially and environmentally sustainable and just businesses, educating nail salon consumers on why it is important to pay a fair price for nail services, creating public campaigns that educate customers about nail salon fair and healthy working conditions and safer beauty product alternatives.
- **Employers should meet with other high-road employers** in the sector to share best practices and business models.



4. Assure health and safety of nail salon workers.

- **Agencies should expand healthy nail salon practices** that are culturally and linguistically appropriate, raise awareness about safer products and practices, provide health and safety trainings, conduct outreach to workers, run health and safety awareness campaigns, provide informational materials to reduce worker exposure, and use worker health outcomes as indicators of safety, instead of possibly outdated exposure limits.
- **Policy makers should address the impact of harmful products** by allocating and requiring cosmetic manufacturers and distributors to conduct further studies, requiring proper labels on products that may be hazardous and making products safe by ending the use of harmful ingredients. They should also provide access to healthcare for workers who are particularly vulnerable to health issues in the industry.
- **Advocates should continue to engage workers on health and safety issues** and best practices through participatory and peer-to-peer programs.
- **Employers should participate in healthy nail salon programs** that include guidelines on and support in the creation of a healthier workplace.
- **Researchers should continue to conduct and expand research on the cumulative effects of chemicals and exposures on worker health** and continue to conduct and expand research on green chemistry to reduce the use of hazardous substances in products and ultimately improve the health and safety of consumers and workers.

Source: Capital & Main

INTRODUCTION: THE NAIL SALON INDUSTRY PAST AND PRESENT

Nail salons in the United States are a booming multi-billion dollar industry that has continued to grow even in the face of the most recent recession. Over the next decade, employment in the industry is expected to grow by 13%, almost double the rate of other US occupations.[1] Nail salons, including their predominantly Vietnamese, Korean, Chinese, Nepali, Tibetan, and Latinx immigrant labor force, have been in US shopping plazas and strip mall for several decades. Salons have been the site of immigrant entrepreneurship and technology innovation, bringing together mostly women customers and workers who otherwise would not cross social boundaries and paths. Now, with the advent of new technology and trends, nail salons continue to shape the parameters of beauty service work, but they are also a key facet of today's service economy, subject to its market forces and labor issues.

Overview of report

In May 2015, *The New York Times* published an exposé on the nail salon industry, raising concerns about wage theft, worker exploitation, health and safety, and overall labor violations in nail salons. While there have been some studies focusing on health and safety conditions in salons, few have explored labor conditions. The UCLA Labor Center launched this study in collaboration with the California Healthy Nail Salon Collaborative to gain a deeper understanding of the nail salon industry through a labor lens. This report is based on existing literature, policy reports, worker stories and analysis of publicly available data and presents an overview of nail salons across three areas: workers, industry, and oversight.

This opening section begins with the historical and current context of the nail salon industry. Part 1 presents a demographic profile of workers and labor-related issues. Part 2 provides an overview of nail salon establishments, sector trends, and dynamics. Part 3 explores existing regulations, legislative solutions, and best practices in the industry. The report concludes with a series of recommendations to ensure safe and dignified working conditions in salons. We note areas in the report where the existing literature and data sets do not fully capture the experience of salon workers; we recognize the need for further, large-scale studies on the sector.

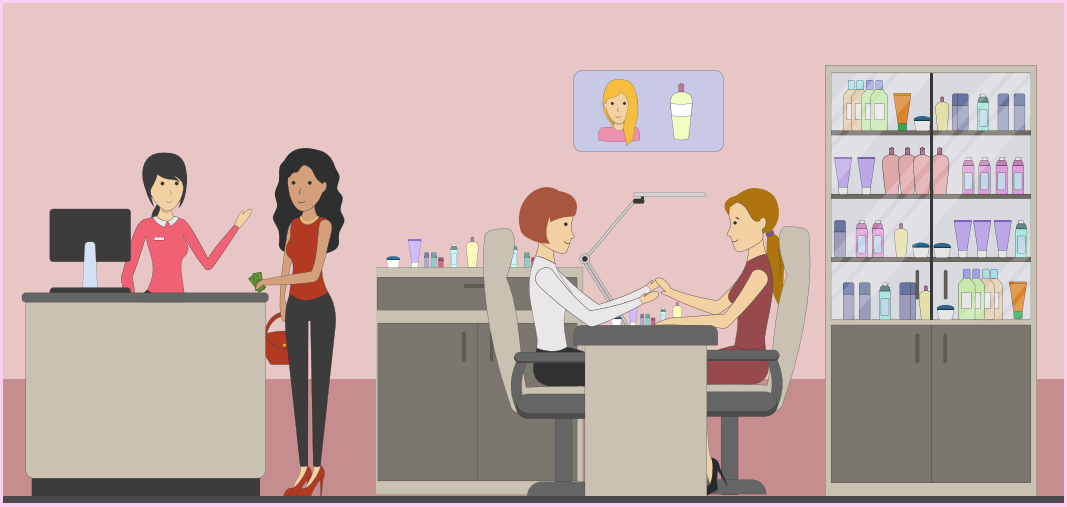
Source: California Healthy Nail Salon Collaborative

Inside the Salon

The nail salon is commonly seen as a place where women go to relax and get pampered. A typical visit to a nail salon includes passing through a waiting area and meeting a manicurist who will take you to a foot bath or a personal station. The manicure or pedicure involves a multistep and intimate process that can include removing old nail polish, trimming and cutting nails, trimming cuticles, applying lotion, massaging hands and arms, and applying base coats, nail polish, and top coats.

Today, however, both luxury salons and smaller mom-and-pop salons offer more than just manicures and pedicures. Many nail salons also provide artificial nails, nail extensions, wraps, acrylics, gels, dip manicures, nail art and rhinestones, foot spa soaks, and leg massages. To reach a broader base of customers, some salons have expanded outside of their specialty to offer additional beauty and spa services, from waxing and facials to body massages.

Though salon operations may appear inexpensive, even basic equipment beyond nail polishes and chemicals can add up to $1,000 for tools annually, and $5,000 for one salon station with a manicure table and a pedicure spa. The materials needed for a 30-minute manicure and pedicure include anything from nail clippers, polish, and polish remover, to a manicure bowl, cuticle nipper, cuticle pusher, cuticle softener, callus remover, base coats/primers, acrylic liquids, gel mix, nail glue, foot files, toe separators, foam slippers, nail files, UV drying machines, and spa disinfectants. Larger salon equipment includes manicure tables, client chairs, ventilation equipment, and pedicure thrones. The design and scale of the equipment all impact their longevity as well as the feel of the salon.



History and Growth of Manicuring Services

The nail salon industry has dramatically changed since the start of the 20th century, including staff and clientele. In the early 1900s, manicures and pedicures were a leisure and luxury service only available at full-service salons that catered to wealthy women. Manicurists were characterized as unintelligent gossips and gold diggers or were hypersexualized. In the 1920s and '30s, nail polish became widely available for purchase at five-and-dime stores, so more middle- and working-class women could paint their own nails at home. Salon service costs, however, continued to be exclusive. By the 1950s and '60s, cosmetics manufacturers were developing new colors for each season. Even as the market for nail polish and painted nails grew, their social significance remained complex. A manicured hand either marked well-groomed feminine glamour or questionable moral standards, where subdued colors were considered more socially acceptable.[2]

Since the 1970s, due to shifting forces in both technology and migration, salon tools and labor have become less expensive. With the development of an electric file in 1974 and the acrylic nail in 1979, manicures became more affordable and less time-consuming.[3] At the same time, the population of Asian immigrant and refugee women in the United States grew due to the global forces of colonialism, war, and changing immigration policy. Some credit the actress Tippi Hedren with the entry of Vietnamese refugee women into California's nail salon industry. In 1975, she helped train 20 women at Weimar Hope Village in Sacramento to do manicures and then helped connect the women to jobs at salons across Southern California.[4]

With new tools available in the industry and training from beauty schools as well as friends and family, Asian immigrants and refugees became nail salon workers and business owners in the 1980s. They helped transform the nail salon into a discount, walk-in business available to a middle- and low-income clientele.[5] For example, Mantrap, one of the first jointly owned Vietnamese and black nail salons, became a chain in the 1980s with shops in black communities across Southern California.[6] Some scholars credit Vietnamese manicurists with democratizing nail salon services.[7] Other scholars describe the shift to faster, assembly-line services at stand-alone shops as the "McNailing" of manicures. Different from the McDonald's' chain, our research shows that the nail sector includes only a few large chains with a majority of mom-and-pop salons.[8]

With the increase in affordable salons and the influx of Asian immigrants and refugees, the stereotype of the manicurist and of the nail salon changed as well. Nail salon employees were racialized and gendered as quiet Asian women with small nimble hands. And the salons they work at are stereotyped as sweatshops, sometimes even represented as dirty or cheap.[9] While nail salon work is low-wage, these kind of negative stereotypes devalue the immigrant women of color working in the industry and portray their salons as lesser than other seemingly luxury or high-end salons.[10]

In terms of official government recognition, "manicurist" was named as a profession in the US Bureau of Labor Statistics in 1980.[11] In the 1980s, the number of cosmetologists (those who provide hair, skin, and nail services) overall continued to grow steadily; the number of manicurists (those who provide solely nail services) also increased slowly and has tripled since 1985.[12] Scholar Miliann Kang affirms that the rise of the nail salon industry is due to a convergence of global and local forces, including "1) the expansion of markets to include [...] the commodification of beauty, 2) the body as a profit-making venue, and 3) women's position in the labor market, or increased women's purchasing power."[13]

Infographic: Brief History of the Nail Salon Industry in the United States 1920s–2000s

1920s–1960s

Cost
Manicures were expensive leisure services for wealthy clientele.

Perceptions
The manicurist was seen as a gossipmonger, a gold digger, or as hypersexualized.[14]

1970s

Technology and Cost
In the early 1970s, professional manicures and pedicures typically cost $50 (equivalent to $320 in 2018 dollars).[15] In the mid-1970s, technology made the service faster and more affordable for a middle and working-class clientele.[16]

Training
Tippi Hedren, the "godmother of the nail industry," trains Vietnamese refugee women to do manicures and places them in salons across Southern California.[17]

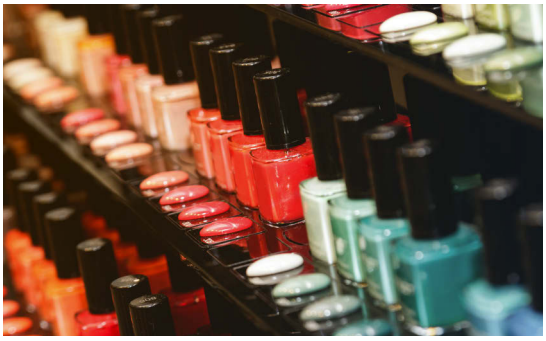
Source: Orange County Register

1980s

Data
Manicure work became recognized as a profession in 1980 in the US Bureau of Labor Statistics.[18]

Industry Growth
The Asian immigrant and refugee population changed the nail salon workforce, including the increase in Vietnamese refugee migration during the 1980s and 1990s. Korean women also pioneered an ethnic niche in New York's nail salon industry, with over 2,000 (or 70%) Korean-owned nail salons in the metropolitan area.[19]

Training
The first training center to open in California's Little Saigon in 1987, the Advance Beauty College held classes in Vietnamese and became a training hub for Southern California's salons.[20]



1990s

Perceptions
Manicurists are now stereotyped as quiet Asian women working in sweatshops, creating a racialized hierarchy of cheap salons counterposed to higher-end salons.[21]

Technology
Spa whirlpool pedicure was introduced in Vietnamese salons, also known as the pedicure throne.[22]

Licensing
State licensing exams were translated into Vietnamese in some metropolitan areas in 1996.[23]

2000s

Industry Growth
The industry continues to experience massive growth; the number of nail salons doubled between 2006 and 2016.[24]

Photo by Andrew Ruiz on Unsplash

2010s

Cost
A basic manicure and a pedicure now can cost as little as $20.[25] However, with the development of longer-lasting gel manicures, upper-end manicures alone now cost at least $30.

Photo by Rune Enstad on Unsplash

Immigrant Entrepreneurship and Workforce

Today, nail salons are primarily owned and staffed by immigrants and refugees. Existing scholarship predominately captures the connection between Vietnamese refugee migration and the nail salon industry, especially in California, while some scholarship focuses on Korean nail salon owners and workers in New York. Less discussed in the literature is the role of Nepali, Tibetan, Latinx, and Chinese immigrant manicurists and communities in the sector. These immigrant and refugee communities have not only created ethnic entrepreneurship and economic niches that are unique to the industry but also developed health, labor, and community organizing initiatives that advocate for quality and safe jobs.

Vietnamese Americans tend to dominate the nail salon industry in California, making up almost three-quarters of licensed manicurists.[26] After the 1975 fall of Saigon and the end of the US military intervention in Vietnam, refugees fled the region in three waves.[27] The first to flee included military and government employees—middle-class, urban residents who were more educated and more proficient in English than those who left later.[28] Vietnamese refugees in the second wave came from rural areas, were comparably less educated, and did not speak English or were less proficient in English. This group mostly settled in California and made a large impact on the nail salon industry. The third wave of refugees were political prisoners, ethnic Chinese, Vietnamese, and others.[29] To this day, new Vietnamese immigrants continue to enter the nail salon workforce.

Immigrants and refugees find work in the nail salon industry through established social networks that allow workers to navigate difficult workplace concerns specific to the service industry. For example, those who otherwise face barriers to getting hired, such as staff with limited English proficiency, unrecognized or unvalued professional credentials from their origin countries, or undocumented immigrant status, can find jobs in the nail salon industry through their social networks. Furthermore, those with relatively little start-up capital can learn how to establish a nail salon business through those networks. Those same social networks in ethnic niches, however, also make health, safety, and labor organizing difficult, as workers may be embarrassed to speak up about poor working conditions and/or may fear retaliation and being blacklisted across the network of salons.[30]

PART 1: WORKER PROFILE

Overview of Nail Salon Workers

This section explores nail salon workforce characteristics using census and other government data sources. We begin with estimating the number of workers in the sector, followed by data on economic and demographics characteristics. See Technical Appendix for detailed information on data sources and variables used.

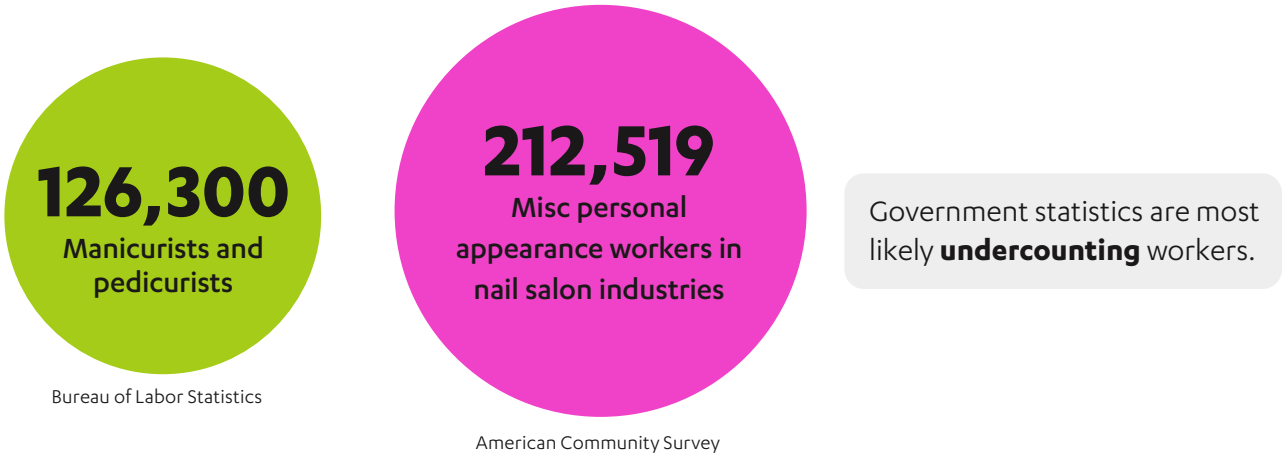
Number of Workers

The focus of this report is workers who provide manicures and pedicures in nail salons. These workers can provide manicures and pedicures through a state licensing process. Cosmetologists can also provide manicures and pedicures in nail salons. There are other salon occupations, such as hair removal, massage, reception, etc., but they are outside of the scope of this study.

A manicurist can be an employee or independent contractor. Employees are hired directly by the business and work for wages. Independent contractors act as their own businesses and are not salon employees. They bring in their own supplies, have their own clients, set their own hours, etc. We explore some of the issues and dynamics of independent contractors later in this section.

The Bureau of Labor Statistics estimates that there 126,300 nail salon workers. The US Census American Community Survey (ACS) has a broader category of personal appearance workers that includes other occupations along with manicurists; their estimate is 212,519.

Figure 1: Estimates of Nail Salon Workers in the United States



Source: Bureau of Labor Statistics Occupational Handbook 2017, US Census, American Community Survey 5-year sample 2012–2016

Government statistics are most likely undercounting workers. The number of workers would be higher if we consider cosmetologists who also perform nail salon services. (In the data, cosmetologists are grouped with barbers and hairstylists, so we are unable to get a count for this category of workers). The underestimate could also be due to the nature of the industry that includes small salons, unregistered businesses, independent contractors, unlicensed workers and undocumented workers.[31]

We believe that the actual number of nail salon workers is much higher than both the above estimates. We obtained license data for New York and California board license data and compared it with the census. Based on the California state board license data from 2017, there are 103,587 certified manicurists in California alone, nearly three times the ACS estimate. In New York, the state board has issued 33,751 licensed nail specialists, close to double the ACS's count. These numbers suggest that government data sources are only accounting for 33% of certified nail salon workers in California and 47% in New York. Even if we assumed that not all licensed manicurists are currently working, the discrepancy is still significant enough to signal an undercount.

Figure 2: Nail Salon Workers in California and New York

There is a **lack of consistent data** about nail salon workers.

SOURCE	CA	NY
State License Board Data	103,587	33,751
American Community Survey	33,740	15,925

Source: California Board of Barbering and Cosmetology Licenses for Current Manicurist 2017 and New York State Department of Labor for Nail Specialty 2018, American Community Survey 5-year sample 2012–2016

In any case, the lack of consistent data illustrates the need to improve data collection processes, ensuring that workers feel safe offering their information and encouraging businesses to report all their workers.

Nail Salon Workers by State

While the government data sources are likely an underestimate, the data does provide us with useful worker characteristic information that can give us a snapshot of the industry. For this analysis, we use the American Community Survey, which provides employment data with demographics.

Based on the ACS, about half of all nail salon workers are in California, Texas, Florida, and New York.

Figure 3: Top 10 States with the Largest Percentage of Nail Salon Workers

44% of US-based nail salon workers live in CA, TX, FL, and NY

Source: American Community Survey 5-year sample 2012–2016

The top counties are in the states with the most nail salon worker such as Los Angeles, Orange and San Diego in California, Queens and King County in New York, and Harris and Dallas County in Texas. An outlier is Maricopa County in Arizona that showed high county numbers but low state numbers.

Figure 4: Top 10 Counties with the Largest Percentage of Nail Salon Workers

What **counties** do nail salon workers live in?

County, State	% of Total Nail Salon Workers
Los Angeles, CA	4%
Queens County, NY	3%
Orange County, CA	3%
Harris County, TX	3%
Maricopa County, AZ	2%
Cook County, IL	2%
Dallas County, TX	1%
San Diego County, CA	1%
Kings County, NY	1%
Broward County, FL	1%

Source: American Community Survey 5-Year Sample 2012–2016

Labor Force Participation and Economic Status

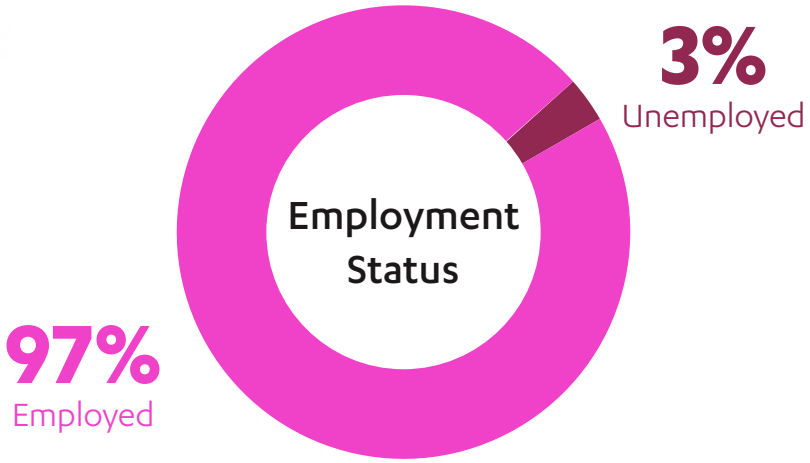
The nail salon sector has high labor force participation and low unemployment. Ninety-two percent are in the labor force, higher than the national rate of 64%.[32] There are 231,457 nail salon workers total when including those in the labor force and not in the labor force.

Figure 5: Labor Force Participation of Nail Salon Workers

Source: American Community Survey 5-Year Sample 2012–2016

Nail salon workers also have a low unemployment rate. Of those in the labor force, only 3% are unemployed, more than half the rate of 7% for all workers.[33]

Figure 6: Employment Status of Nail Salon Workers



Source: American Community Survey 5-Year Sample 2012–2016

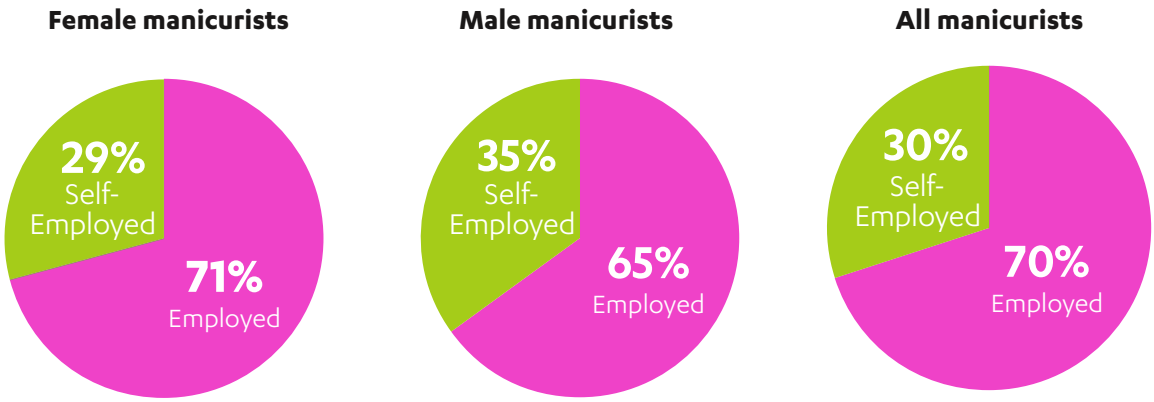
Based on those currently employed, more than two-thirds work full-time, and most work year-round, though there are slight gender differences: women are more likely than men to work part-time and to work only part of the year rather than year-round.

Figure 7: Full-time and Full-Year Status of Nail Salon Workers

Source: American Community Survey 5-Year Sample 2012–2016

Almost a third of the workforce are classified as self-employed rather than employees, three times higher than the national rate of self-employment.[34] Self-employed workers may be independent contractors, a sole proprietor or a member of a business partnership.

Figure 8: Employee and Self-Employed Status of Nail Salon Workers

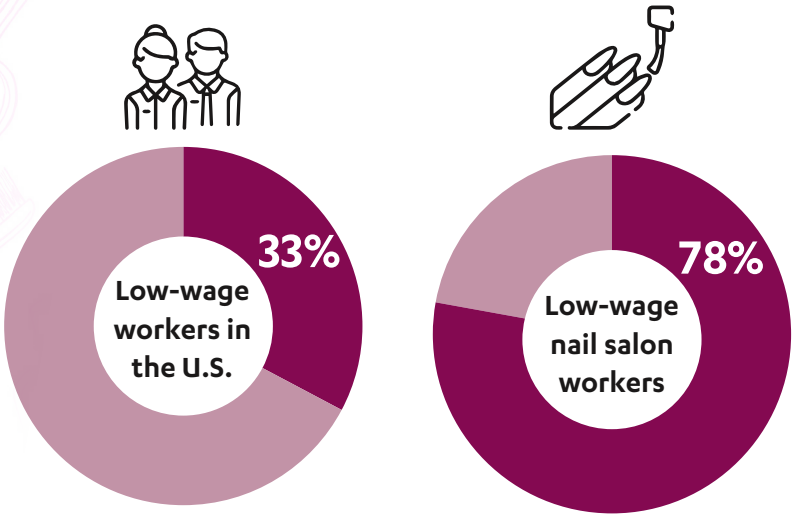


Source: American Community Survey 5-Year Sample 2012–2016

Wages

The nail salon industry, like many service sectors, is primarily characterized by low-wage jobs. We define low-wage workers as those who earn less than $13.46 an hour, which is two-thirds of the 2016 median wage for full-time workers in the United States. Our analysis of census data shows that 78% of nail salon employees (excluding the self-employed) are earning low wages. This percentage is significantly higher than the national rate of 33% for all industries. These findings are not unexpected; because the price of manicures and pedicures is so low, those providing the services are bound to earn low wages.

Figure 9: Nail Salon Workers Low-Wage Rate



Source: American Community 5-Year Sample 2012–2016

The hourly median wage is low for nail salon workers. Full-time nail salon workers earn less than half of workers in other industries. There is little wage difference between full-time and part-time workers, and earnings even go down as hours increase. This could be for various reasons such as being paid a flat rate so that the hourly rate goes down as hours increase or being paid under the table.[35]

Figure 10: Nail Salon Workers' Hourly Median Wage

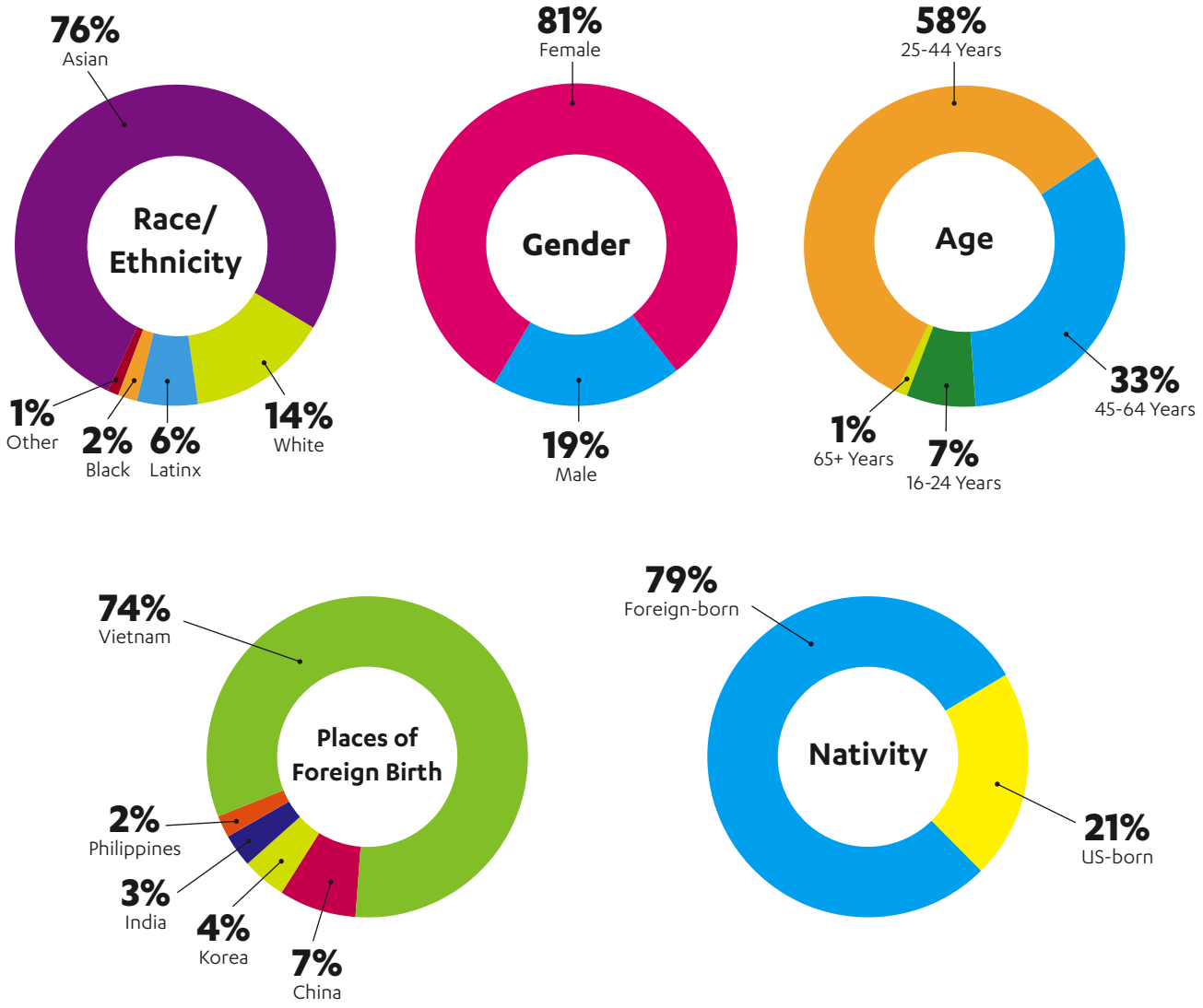
Source: American Community 5-Year Sample 2012–2016

Race/Ethnicity, Age, Gender, and Nativity

The following demographics are for nail salon workers currently in the labor force. Women make up the majority of the workforce, though 19% are men. More than half of workers are between the ages of 25 and 44. Research has begun to explore the impacts of cosmetics chemicals in this age range, particularly with the potential for reproductive health impacts, with younger nail salon workers reporting a lower health status than a general population.[36] Additionally, a third of workers are between 45-64, with the repetitive, detailed, and fast-paced work sometimes less suited for older workers. Because of this, employers may also reflect ageism with a preference for younger workers.

Asians make up the majority of the workforce, followed by white workers. Less than 10% are Latinx, Black, or other ethnicity. Immigrant workers dominate the sector. As noted in the Introduction, the Vietnamese community has played an integral role in expanding the industry. Census data shows that more than half of the workforce is Vietnamese, though other Asian communities are part of the workforce, such as Nepali, Chinese, Korean, Indian, Pilipinx, and Khmer workers as well as Mexican workers.

Figure 11: Nail Salon Worker Characteristics



Source: American Community 5-Year Sample 2012–2016

Of those born abroad, median years in the US is 17 years—though men have a longer tenure than women.

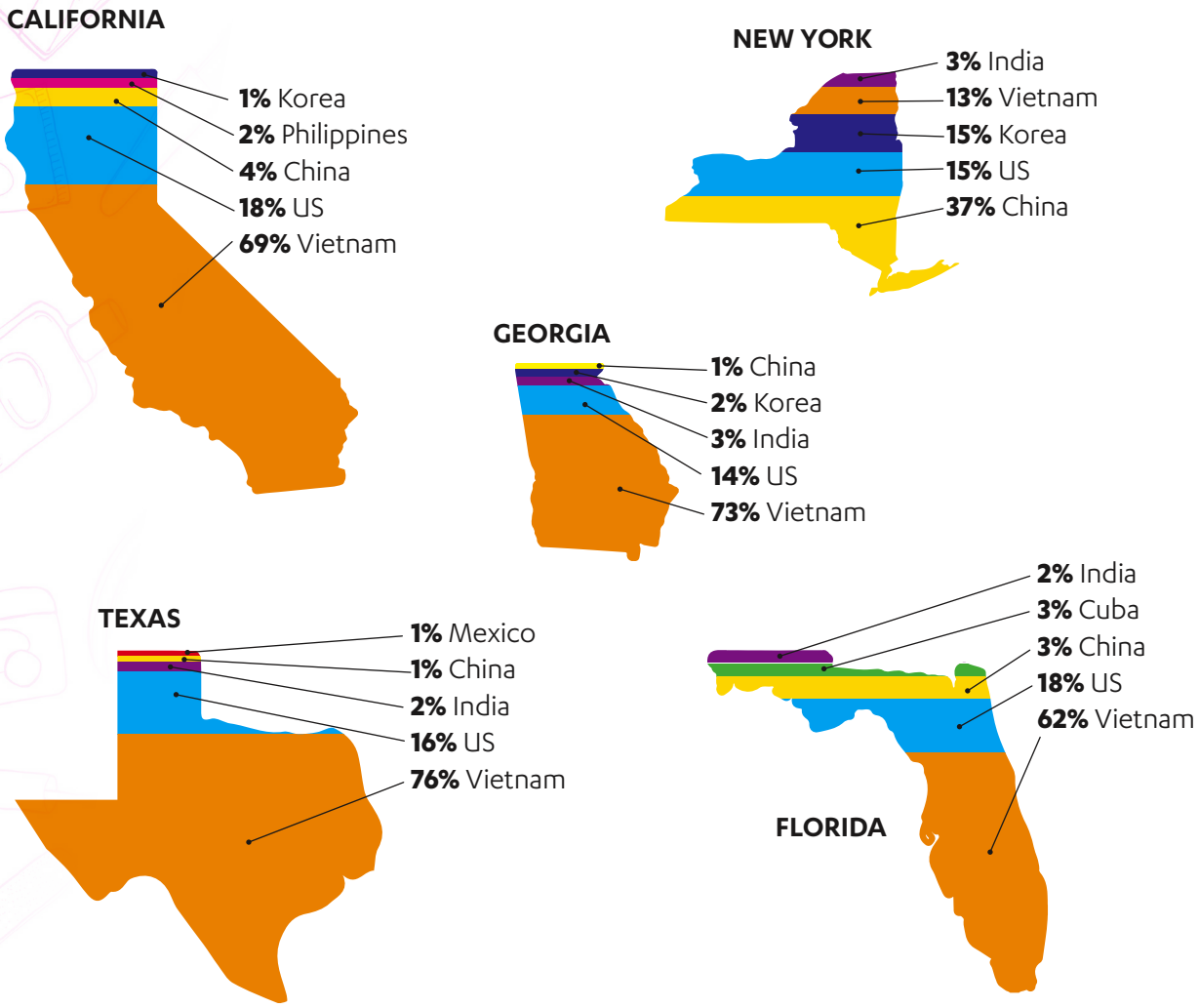
Figure 12: Median Years in the US (among Foreign-Born)

What are the **median number of years** that foreign-born workers have lived in the US?

Foreign-born female workers	Foreign-born male workers	All Foreign-born nail salon workers
16 years	**22 years**	**17 years**

In the states with the most salon workers, the Vietnamese community dominates—except for New York, which has more Chinese and Korean workers. Many of the states include US-born workers, who are of various race/ethnicities, as well as those from the Philippines, India, and Mexico. These top five states also have the most Asian nail salon workers in total in the country.

Figure 13: Top 5 Places of Birth in States with the Most Nail Salon Workers

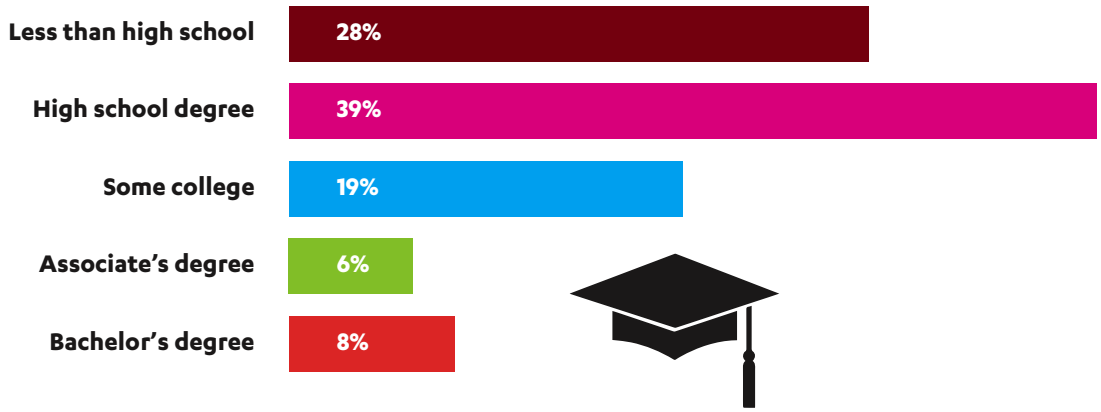


Source: American Community 5-Year Sample 2012–2016

Educational Attainment and Language

The majority (72%) of nail salon workers have a high school education or more. Nineteen percent have attended some college but not completed a degree, while 6% have an associate's degree, and 8% have a bachelor's degree or higher.

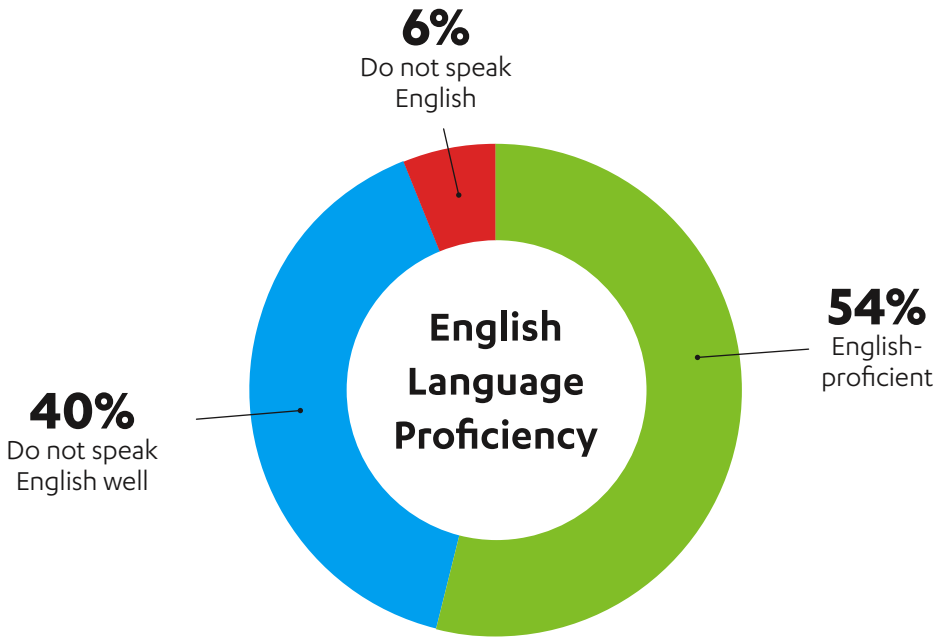
Figure 14: Educational Attainment of Nail Salon Workers



Source: American Community Survey 2012–2016 5-Year Sample

Of those not born in the US, almost half of workers have limited English proficiency. Access to multilingual language resources is a critical issue in the nail salon industry. Workers must have access to health and safety and know-your-rights materials and to be able to get licenses in languages beyond English.

Figure 15: English Language Proficiency

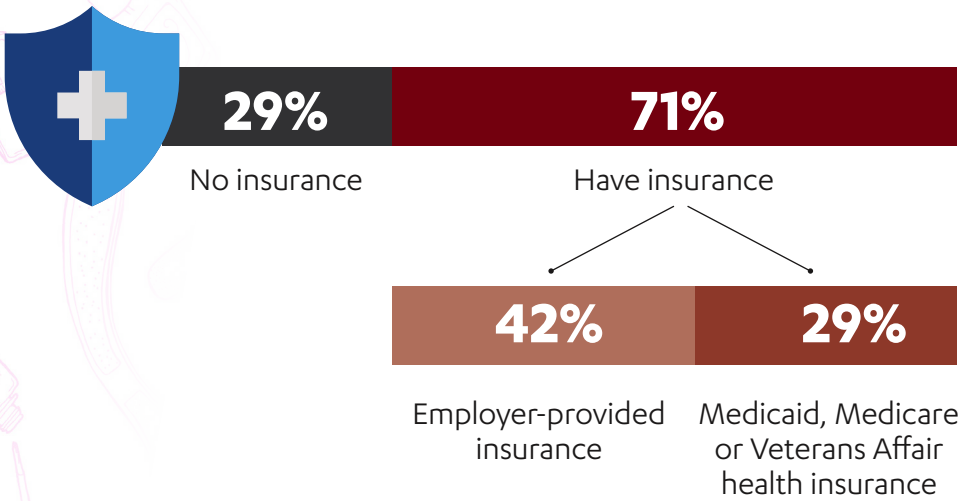


Source: American Community Survey 2012–2016 5-Year Sample

Benefits and Household

ACS data shows that 71% of nail salon employees have some form of health insurance, a rate lower than the national rate of 88%.[37] Of those with insurance, 42% have health insurance through their employer, compared to 62% of employer-insured workers nationally. Over a quarter receive coverage through public programs such as Medicaid and Medicare, higher than the national rate of 19%.[38]

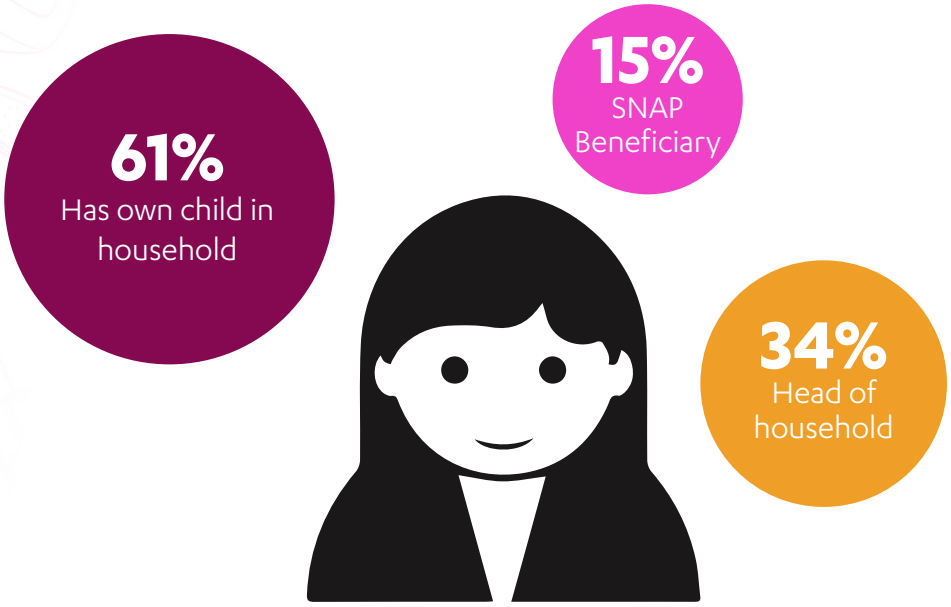
Figure 16: Health Insurance Coverage of Nail Salon Workers



Source: American Community Survey 2012–2016 5-Year Estimate

Most nail salon workers support family members, and a third are heads of households. 15% of workers receive Supplemental Nutrition Assistance Program (SNAP) benefits.

Figure 17: Household Composition and Supplemental Nutrition Assistance Program (SNAP) Benefits



Current Issues for Nail Salon Workers

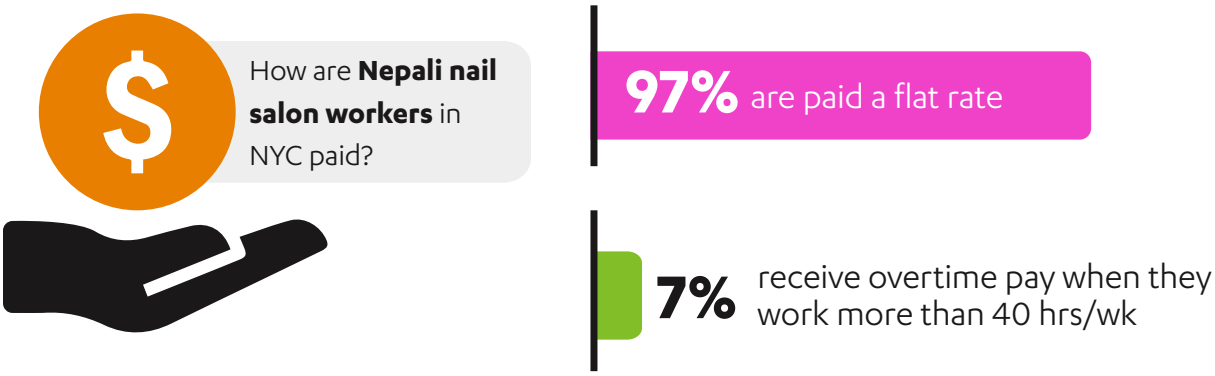
These sections explore the working conditions faced by nail salon workers, including labor issues, misclassification, barriers to licensing, and health and safety issues.

Labor Issues

The very limited existing research on workplace conditions in nail salons has mostly focused on health impacts, with few or no studies on wage issues. A 2015 *New York Times* article documented how many nail salon workers in New York City were paid less than minimum wage, not paid at all, monitored via video, and/or humiliated at the workplace.[39] While the *Times* article exposed a host of labor, health, and safety violations to a wider audience, those issues and the advocacy and organizing efforts to address them are not new.

Community organizations have also conducted surveys with nail salon workers. A survey of 189 Nepali workers in New York City found poor working conditions. Almost all the workers were paid a flat rate rather than an hourly wage. They could be paid as little as $30 per day, with most workers making between $40 and $70 per day. Very few of the workers reported receiving overtime. Workers also reported working 9- to 12-hour days with one or two days off during the week. Most workers responded that their break time was not fixed or regular, but rather taken when and if customer inflow was lower. In addition, 30% of workers were not allowed to take sick days, and those who did were not paid. More than 1 in 10 workers were required to work while sick, and 4 in 10 worked with clients while experiencing cold/ flu/cough symptoms.[40]

Figure 18: Labor Conditions of Nepali Workers in New York City



Source: Adhikaar for Human Rights and Social Justice behind the Polish: Experiences of Nepali-Speaking Nail Salon Workers in New York City

A 2016–2017 survey of 93 Vietnamese nail salon workers in California found various wage violations including not being paid minimum wage or overtime, being paid late or being asked to work during a break.[41]

Figure 19: Wage Violation Among Vietnamese Nail Salon Workers in California

Source: California Healthy Nail Salon Collaborative and UCLA-LOSH Survey

In a study on wage theft across New York, Chicago, and Los Angeles, which included surveys of salon workers, wage theft was pervasive in all three cities.[42] Within the broader grouping of beauty, dry cleaning, and general repair, the survey found that half of workers did not receive minimum wage, and the majority experienced overtime and meal-break violations.

Figure 20: Wage Violations for Beauty, Dry Cleaning, and General Repair Workers in New York, Chicago , and Los Angeles

Source: Broken Laws, Unprotected Workers

In addition to wages, tips play a central role in salon workers' pay. While some states have one minimum wage for all workers, other states assign a lower minimum wage for tipped workers. Tips matter for salon workers' income, as tips can help make up for lower wages. The same study on Nepali nail salon workers in New York found that nearly all workers received tips ranging from $50 to $200 per week; those in salons with lower prices earned less. However, the *New York Times* article exposed how in some salons, tips were pooled and not distributed to workers, while other workers had their tips docked.[43] Some of the challenges around enforcement and addressing these labor issues are discussed in Part 3.

Misclassification

In the nail salon, a manicurist may be classified as an employee or an independent contractor. Specifically, employee status is determined by the degree of control the employer exercises over a worker's job conditions. Independent contractors are not protected by laws requiring minimum wage, overtime pay, workers' compensation, and other workplace benefits. Contractors are also unable to collectively bargain about their working conditions and are not protected from discrimination, harassment, or retaliation under employment laws. Some workers may be legitimate independent contractors, but there are concerns that many manicurists are purposely misclassified to avoid labor laws and protections.[44]

In the California 2016–2017 survey of Vietnamese nail salon workers, 39% reported that they were independent contractors.[45] Additionally, an ethnographic study on Northern and Southern California Vietnamese nail salons instantiates an independent contractor model using the *ăn chia* (split profits) payment system. Even though workers are given 60% of the profits per client and owners take 40% per client, the system is still exploitative because owners asked the workers to take clients with services that earn less or are least desirable.[46]

In focus groups with nail salon owners in California, researchers found that once they explained the differences between employers and independent contractors that seven of the eight salon owners realized they were not classifying their workers correctly.[47] The California Division of Labor Standards Enforcement recently cited a nail salon in California for misclassifying its workers.[48] In 2013, that agency categorized salon workers as employees, but the California Employment Development Department found them to be independent contractors.[49]

This year, the California Supreme Court simplified the criteria that determines if a worker is an employee or independent contractor. The 2018 ruling says a worker can only be an independent contractor if they are a) free from control of the hirer, b) the work is outside the usual course of the hiring business, and c) the worker is customarily engaged in an independent trade, occupation, or business of the same nature as the work performed for the hiring business; this is also known as the ABC test.[50] This decision could greatly impact the way the nail salon sector classifies its workers.[51]

Van's Story

Current Nail Salon Worker

Female, age 32

I immigrated to the United States at 24 years old to get a better life for myself and my future children and to earn money for my family in Vietnam. I became a nail technician because it was easy to get a license, and it was difficult for me to understand English at the community college I attended. Throughout the past few years, I have worked in several salons. I left past salons for various reasons: the wage was too low because I did not get much money from tips, employers mistreated workers, and distance from home.

I am a full-time employee and get paid based on the *ăn chia* system, in which I get 60% of the pay, and my employer gets the remaining 40%. My pay varies based upon how much my customers tip me, how busy the salon is, and the prices of services. Even though I work hard, have a lot of customers, and my salon has higher nail service prices than other salons in the area, I only earn about $1,800 per month. I constantly have to buy my own nail supplies, which can cost up to $1,000 per year.

I know that my ability to earn money is limited by age in the nail salon industry. The longer you work in the industry, the more your skills decline. Around 40 to 50 years old, your eyesight starts deteriorating and your hands become shaky, which means that you cannot offer good services. I know people who have developed permanent pimples on their hands from working with nail salon chemicals. My friend became allergic to acetone and started developing extremely itchy rashes.

Because of the physical limitations and work-related health issues that develop from working in the nail salon industry, some employers place newspaper ads that specifically ask for nail techs under 40 years old. I have seen a lot of worker mistreatment that results from age. Employers abuse older workers if they work too slowly. In many salons, older workers are viewed as expendable, while younger skilled workers are favored. I feel like I have to earn additional income now because it will be difficult when nobody hires me as a nail tech when I am older.

Barriers to Licensing

Nail salon staff are required to have a manicurist license to provide services and comply with state consumer boards. Such licensees need 100 to 600 hours of training at approved cosmetology schools, and manicurists are required to complete practitioner hours at salons. A few states also ask for high school or seven to ten years of schooling. In addition, some states require some level of English proficiency. The lack of accessible languages in the curriculum training and exam process can be a barrier for some immigrant salon workers, making them less likely to seek licenses or become manicurists.[52] Further, the number of hours and cost of the training can be another barrier. In a study of Nepali workers, while 17% of respondents were licensed by New York State, others did not seek a license because of limited English proficiency (48%), immigration status (14%), or lack of information about how to get a license (11%). At the time of the study, the license exam was not given in Nepali.[53] Most of these workers reported receiving training from family members, with only 18% receiving training at a school or program.

Advocates in both New York and California have addressed issues of language justice, or the ability to communicate in a language of comfort, in cosmetology and manicurist licensing. Since 2010, the California Healthy Nail Salon Collaborative's advocacy has resulted in the availability of cosmetology exams, renewal processes, notices, and agency complaint forms in English, Spanish, Vietnamese, and Korean in California.[54] Similarly, in 2015, the New York Healthy Nail Salons Coalition's advocacy has resulted in most but not all forms available in English, Spanish, Haitian/Creole, Italian, Korean, Russian, Nepali, Vietnamese, and Chinese in New York.[55]

Catherine's Story

Previous Nail Salon Worker

Female, age 22

When I was in 10th or 11th grade, I started my first real job at a nail salon. I worked seven-hour shifts, three to four times a week, for three to four months while I was in school. It was difficult because of the pressure. You have to be a perfectionist as a nail salon worker, and customer service is key. People will be annoyed with you if you're not perfect at nails. To this day, I'm not quite sure if it was legal for me to work. I didn't have a license, so they took 30% to 50% of my pay. If I got a license, they would take less of my pay. I did not make too much money from the work because it was commission-based. I understand a lot of people work in the nail salon industry because you can make good money, but I don't think being a nail salon worker is best for the long-term because of the adverse health effects you can get from the job. The owner of the salon had a lot of joint problems in her hands, and the other older nail salon workers would talk about the bad effects of the chemicals. Even though I only worked at the nail salon for a short amount of time, the smells would bother me.

Health and Safety

Nail salon workers are at risk for many different short- and long-term occupational health conditions, ranging from respiratory disorders to cancer, that are related to the products they work with.[56] Nail salon workers are exposed to salon and cleaning chemicals through inhalation, ingestion, and skin absorption, but there have been limited studies on the combined and long-term health effects of these chemicals.[57] Many of the chemicals in cosmetic products, also known as personal care products, have not been thoroughly assessed for safety, and some chemicals may not have credible epidemiological findings or exposure limits.[58] Outdated regulatory standards and lack of government oversight over nail salons and nail salon products contribute to workers' exposures to dangerous chemicals.[59] Few nail salon product manufacturers currently offer safer alternatives, and for some product categories, safer alternatives may not even exist.[60]

Several factors prevent nail salon workers from demanding improved working conditions. Institutional power inequalities between workers and owners prevent workers from understanding and advocating for better workplace conditions.[61] While nail salon owners and workers tend to maintain close relationships, owners control work practices and the information disseminated to workers.[62] Fear of employer retaliation can also prevent workers from reporting hazards.[63]

Additionally, the lack of transparency in regulatory agencies' salon inspections and subsequent fines have fostered distrust among employees. This may hinder workers' willingness to open up to agencies about their problems.[64]

Finally, workers receive limited training about workplace hazards and safe chemical handling.[65] Health and safety information that is provided is usually in English only and contains highly technical language.[66]

Source: Capital & Main

Cathy's Story

Previous Nail Salon Worker

Female, age 33

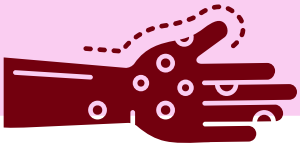
My life has been shaped by my family's work in the nail salon industry. I moved around a lot as a kid. My parents, ethnic Chinese living in Vietnam, emigrated to the United States in 1979. My parents, aunts and uncles entered the nail industry and worked in family-owned nail salons in Los Angeles. My parents eventually saved enough money from working to open and work in several nail salons in downtown Brooklyn in the 1980s and 1990s. As a kid, I went to work with my parents on weekends and in the summers every day because we did not have childcare. I worked in the nail salon industry in high school and through college at my parents' salons until I was 20 years old.

My mother has developed many health issues, which I believe happened because my mother did not take care of herself during her years working in the nail salon industry. When the salon was busy, my mother and other workers would go a whole day without eating or using the restroom. When my mother worked, nail salons had no ventilation, no level of oversight. Salon workers used acrylics more in the past, which involved using bonding acrylic liquid that has been shown to be toxic. Customers would complain about the smell, but we all became immune to the smell. My mother's health deteriorated throughout the years, including blurrier eyes and digestive issues. Both of my parents would always apply Salonpas and turn on the heating system to warm their tired shoulders. Sometimes I ask whether all the money we earned was even worth it to treat my mother's ailments now. It was all about "work, work, work," and making money. Now we are facing the aftermath of it. My family had to move our parents back to Vietnam because of our financial circumstances. Today, many of my aunts and uncles continue working in the nail salon industry in California. I see a lot of worker exploitation, which I believe is from the intense competition in the nail salon industry, specifically with salons working against each other in price setting. I believe we still need to find solution to these high levels of price competition that ultimately hurts workers in the end.

A Brief Overview of Health and Safety Issues in Nail Salons

Hazardous ingredients and materials are present in products and salons.

- "Toxic trio" ingredients (toluene, formaldehyde, and dibutyl phthalate [DBP]) in nail polish and other hazardous chemicals may cause serious health problems.[67]
- Chemical disinfectants, such as alcohol and bleach can cause skin disease and increase risk of infection.[68]



Workers are vulnerable to exposure from multiple routes.

- Although some environments may not exceed exposure limits for certain chemicals in the air, this does not mean these environments are healthy. Chemical exposure may include inhalation, ingestion, and skin absorption.[69]
- Many chemicals may not have credible epidemiological findings or exposure limits.[70]

Workers are at risk due to chemical exposure.

- Exposure to chemicals may be associated with allergies, eye, and skin irritation, eczema, or reproductive problems.[71]
- Those working with acrylic nails were more likely to report health problems, such as nose irritation, allergies, skin irritation, stress, pain, coughing, nausea, difficulty breathing, asthma, and miscarriages.[72]
- One survey showed that 10% of nail salon staff worked while they were pregnant, and 8% of workers know a worker who had reproductive complications, such as birth defects, miscarriages, stillbirths, and difficulty conceiving.[73] In other studies, workers also reported reproductive effects,[74] and some included miscarriages.[75]
- Rates of thyroid cancer among cosmetologists and lung cancer among manicurists were elevated in a California study.[76]
- A Canada study has shown that nail salon workers who regularly applied nail polish had ten times greater risk of contracting lupus, an autoimmune disease, than other categories of workers.[77]
- A 2009 study found that workers regularly applying acrylic-nail chemicals experienced both decreased lung function and increased airway inflammation.[78]

Nail salon workers report work-related ergonomic body pain.

- This includes shoulder, wrist, hand, neck, and lower back problems.
- Uncomfortable and static postures may increase muscular fatigue/strain and ultimately cause these problems.[79]

Manufacturers need to reformulate their products.

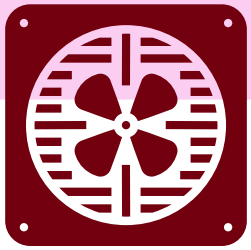
- Studies of nail polishes claiming to be free of certain toxic ingredients have shown most of these claims to be false.[80]
- It is important to find substitute ingredients for nail products that are less toxic.[81]

Workers need personal protective equipment.

- Appropriately sized personal protective equipment, including nitrile gloves, help reduce exposure to chemicals.[82]
- A survey of Nepali workers found that workers sometimes wore protective equipment, very few workers wore protective equipment all the time, and most workers had to purchase their own protective equipment.

Salon ventilation is key to worker protection.

- Ventilation can come in different forms: ventilation table, open doors or windows, roof fan, or a central ventilation system.[83]
- Studies of salons found them to have inadequate ventilation.[84]



Source: Capital & Main

Source: Capital & Main

PART 2: INDUSTRY PROFILE

This section reports on the size of the industry based on the number of nail salon establishments, along with industry revenues, trends, and company profiles. The statistics generated for this profile are drawn from multiple sources using the industry NAICS category 812113.

Nail Salons in the United States

According to the County Business Pattern, there are an estimated 23,745 nail salons in the United States. Similar to the worker estimates, the number of salons, some that are unregistered or unincorporated, may also be an undercount.[85]

Figure 21: Total Nail Salons in United States

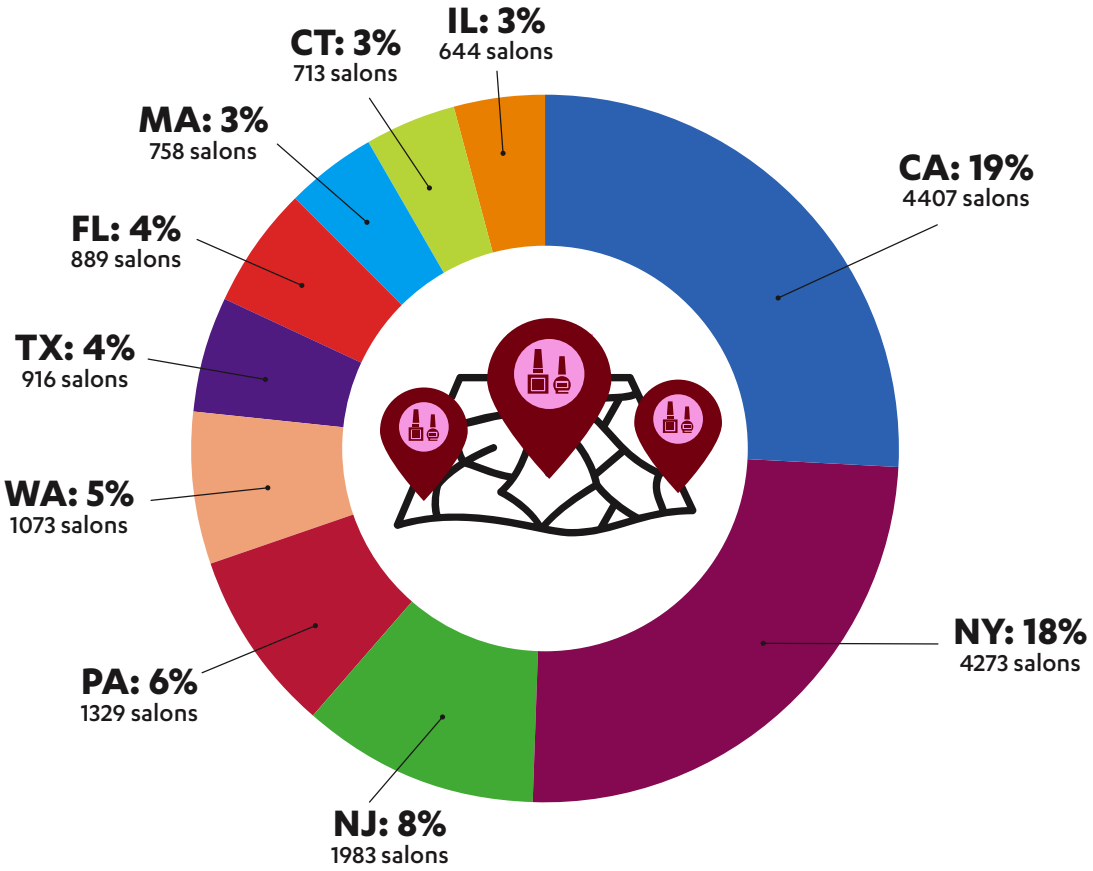
There are
23,745
nail salons in
the U.S.

Government statistics are most likely **undercounting** salons.

Source: County Business Patterns 2016

Based on the available data, the states with the largest number of salons are California, New York, New Jersey, Pennsylvania, Washington, Texas, Florida, Massachusetts, Connecticut, and Illinois.

Figure 22: States with the Most Nail Salons



Source: County Business Patterns 2016

The counties with the largest numbers of nail salons are Los Angeles County in California followed by Kings, New York, Nassau, Queens, and Suffolk Counties in New York.

Figure 23: Counties with the Largest Number of Nail Salon Establishments

What **counties** have the most nail salons?

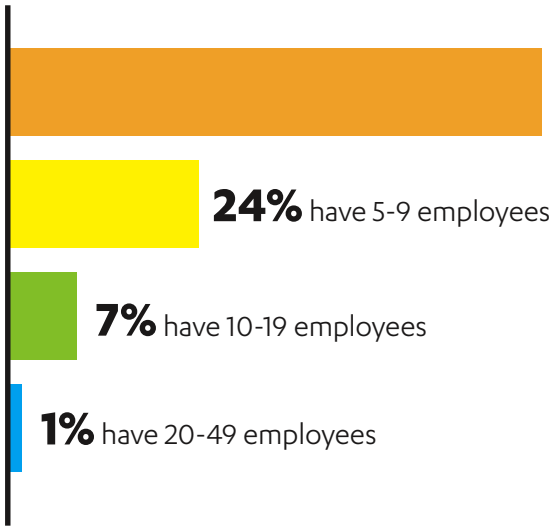
County, State	% of Nail Salon	# of Nail Salon
Los Angeles, CA	5%	1229
Kings County, NY	3%	615
New York County, NY	3%	606
Nassau County, NY	2%	577
Queens County, NY	2%	520
Suffolk County, NY	2%	447
San Diego County, CA	2%	446
King County, WA	2%	406
Orange County, CA	2%	360
Cook County, IL	1%	345

Source: County Business Patterns 2016

More than two-thirds of nail salons have fewer than 5 employees, and a quarter have between 5 and 9 employees. This higher volume of small-scale salon operations shows that the nail salon industry is dominated by mom-and-pop salons. However, this data is limited to employees only, so the salons may have more workers who are independent contractors. In the section on nail salon chains further in this report, we found that there are only a handful of chains within the nail salon sector with a total of approximately 1,000 salons, again highlighting the prominence of mom-and-pop salons overall.

Figure 24: Establishment Size by Number of Employees

92% of salons have less than 10 employees.

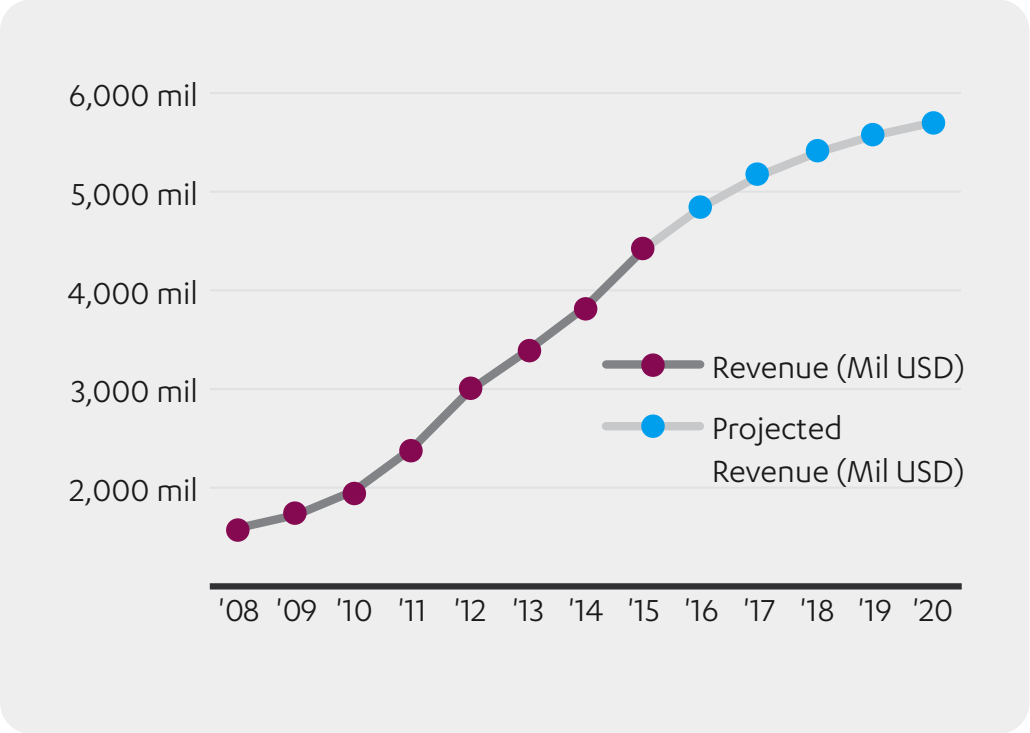


Source: Quarterly Census of Employment and Wages 2017 First Quarter

Industry Revenue, Spending, and Payroll

Nail salons continue to grow and over the next decade, employment in the industry is expected to grow by 13%, almost double the rate of other US occupations.[86] The most recently available data from the US Census reveals that in 2015, total revenue for nail salons in the United States reached $4.4 billion, up 15% from the previous year. Nail salon revenue has grown steadily since 2008, and it is projected to continue growing, with forecasted revenues of $5.7 billion in 2020.[87]

Figure 25: Revenue of Nail Salons from 2008 to 2020



Revenue

Year	Revenue Mil USD	% Growth
2008	$1,593	—
2009	$1,725	8%
2010	$1,969	14%
2011	$2,399	22%
2012	$2,989	25%
2013	$3,393	14%
2014	$3,834	13%
2015	$4,415	15%

Projected Revenue

Year	Revenue Mil USD	% Growth
2016	$4,842	10%
2017	$5,162	7%
2018	$5,397	5%
2019	$5,571	3%
2020	$5,701	2%

*Source: US Census via Statista *Projected Figures*

Minh's Story

Daughter of Nail Salon Worker

Female, age 29

My mom was previously an accountant. She transitioned into the nail salon industry after my father's autoparts business fell apart. She felt it would easier to build relationships in salons owned and operated by Vietnamese people. She also felt the nail salon industry provided greater job security than other jobs. I am frustrated and saddened after seeing my mother's downward socio-economic trajectory.

My mom hopes to retire and move back to Vietnam with my grandmother. She cannot afford living here, and she does not have healthcare as a nail salon worker. She works over 40 hours a week, five days a week, and still does not earn a lot. She is paid through paychecks and tips, and there is no confirmation that her employment status is legally documented. I am angry seeing older Vietnamese women exploited in this industry on a larger level. As a society, we must ask why it is okay for Vietnamese and other immigrant women to fill the nail salon industry across the United States.

I feel powerless to help my mother's situation, whether it be through giving to my mom the resources she needs to advocate for herself or supporting my mom herself. One reason why it is so difficult is because my mother does not talk to me about her work experiences. Additionally, I am currently working 50 to 60 hours a week. From 2012 to 2014, I balanced school and over two to three part-time jobs, amounting to over 40 hours of work a week, so that I could pay for my own college tuition and not burden my mom, who does not have many financial resources herself. I work hard to get by, so it is difficult to also advocate for my mother. This financial instability is an intergenerational problem—it does not only affect my mother, but also my life prospects.

In 2017, spending in the industry according to *Nails Magazine* was approximately $8.5 billion, and *Ibis World* for both hair and nail was approximately $11.8 billion.[88] Payroll in the sector is $1.6 billion which is over a third of the revenue (though this only includes wage-earning employees and not independent contractors).[89]

BizMiner analyzed 12,742 salons and found that their average business revenue is 282,954. It breaks down average income and expense by industry. Based on their analysis of nail salon expense, about 33% goes to labor costs related to sales, officers, salaries, and pensions. In addition, some part of sales, general, and administrative cost includes personnel, so the percent could be as high as 53%.

Non-labor cost of sales includes materials involved with services and account for 17% of business expense. Rent accounts for 10%, and various other expenses, such as taxes, advertising, and repairs, make up 20% of expense.

Figure 26: Nail Salon Industry Financial Report 2016 United States

Financial Report 2016

Item	Dollar Cost	Percent
Cost of sales	$49,581	17%
Cost of sales: labor	$16,911	6%
Officer compensation	$22,455	8%
Salary wages	$52,737	19%
Benefits pensions	$2,343	1%
Sales, general, admin & misc: includes some overhead, admin, & supervisory wages	$56,941	20%
Rent	$29,275	10%
Other costs such as taxes, advertising, repairs, etc.	$52,711	19%
Total: Average business revenue	**$282,954**	**100%**

Source: BizMiner 2016 Industry Financial Profile

Trends in the Industry

New developments in cosmetics, fashion, and nail polish technology have set the pace for trends in the nail salon industry. In 2013, nail art was big in salons, involving intensive, hand-painted, polish-only designs. *Nail Magazine* touted that "many clients you might have thought of as conservative will now proudly wear cute and trendy looks on their nails."[90]

More recently, gel manicures have "revolutionized the nail industry," with the technique rising in popularity since 2015. The application took hold because of its polish-like appearance, its different feel from acrylic,

and its long wear.[91] Gel lasts approximately two weeks and requires only a 10-minute removal process. Salons also like gel because it is higher value and salons can charge more for it.[92] Gel became a "hit with nail techs" and clients alike, who "started going into salons in waves."[93] In the last year, dip systems have also taken hold in nail salons. Dip systems are also fast to apply and durable for the client; for the manicurist, dip systems require less training than acrylic nails or sculpting.[94]

In addition to new types of nonacrylic applications, salon cosmetics ingredients have undergone a transformation toward more "natural" products. Some cosmetics manufacturers have labeled and advertised their products as "natural," "green," and/or "organic." The shift in labeling speaks to manufacturers' knowledge of consumer preferences for safer products and underscores consumer awareness about the impact of cosmetics chemicals on the environment as well as the body. The Federal Trade Commission has regulations for how the label "green" can be applied to products and what "green" means. Due to advocacy efforts discussed in this report's regulations section and to overall trends in the industry, some cosmetics companies and nail polish lines have sought to eliminate the toxic-trio of chemicals (toluene, formaldehyde, and dibutyl phthalate). Manufacturers mostly label their products as either toxic-free, using older standards of toxicity, or specifically toxic-trio-free; and some are even starting to market their products as 5-free, 7-free, and 9-free, etc. However, new products often include untested chemicals in their formulations and toxicology reports, or manufacturers replace known toxins with regrettable substitutions. Differently, a focus on cosmeceuticals has also emerged, or cosmetics that offer medicinal benefits during their use—often applying to lotions and skin care.[95]

The nail salon industry has also been trying to attract male-identifying customers using masculine advertising. Hammer & Nails salon not only sells beer and whiskey but also describes their interiors as a "man cave."[96] From wall photos displaying hammers to sports shows on television, the owner has created a more masculine environment for men who are not metrosexual or gay; the salon's services are also 20% more expensive than other salons.[97] As of 2018, the business has four salons, will open another 14 next year,[98] and expects to have 250 available by 2020.[99] Like Hammer & Nails, some states have begun allowing salons to serve alcoholic beverages; a 2016 California bill allows beauty salons to serve alcohol if the salon is in good standing, the alcohol is not for sale, and the amount of alcohol offered as a part of the service is within specified limits.[100]

Social media and digital technology has also affected salons, from their marketing to their customer relations. In 2015 *Nails Magazine* concluded that "you cannot understate the power of social media's effect on the nail business. Nail art is one of the top five most tagged items on both Pinterest and Instagram."[101] Yelp, too, contributes to salons' customer engagement and management. Though designed as a marketing mechanism, negative reviews online both impacts dynamics at the workplace and inadvertently pressures salons to get good reviews.

The last trend has emerged from the gig economy, with the development of on-demand, app-based manicure services. These type of mobile salons allow customers to order manicures or pedicures through a cell phone app, and the manicurist meets the customers where they are, though some workers will only go to workplaces or corporate events. A few apps were launched as early as 2012, mostly in the New York and San Francisco areas, but they have now expanded to Boston, Washington, DC, Los Angeles, New Jersey, and South Florida. These apps include GlamApp, Manicube, La Mienne, Pamper, Priv, and Salons in Vans. GlamApp, for example, which started in 2014, had 30,000 users in 22 markets in the United States and United Kingdom, with over 2,000 stylists as of 2017.[102] Manicube was founded in 2012 by two business executives too busy to make the trip to salons.[103] The app became available in New York, Boston, Chicago, and San Francisco, and has since been acquired by Elizabeth Arden Red Door.[104] Manicube's basic services run from $12 to $15, and their high-maintenance services cost $15 to $18.[105] Different states are grappling with how to address mobile salon services; in early 2018, Nebraska's Department of Health and Human Services introduced a bill to license and regulate mobile salon services.[106]

Nail Salon Chains

Nail salons have traditionally been mom-and-pop operations, but the sector is seeing some large chains enter the market. The following are highlights of some of the large chains emerging in the sector.

Regal Nails

Year Founded: 1996
Number of Nail Salons: Over 800[107]
Locations: Big box retailer settings in United States, Canada, Puerto Rico[108]
Parent company location: Baton Rouge, Louisiana
Annual parent company revenue: $1.15 million[109]
Services: Adult manicures starting at $10

Regal Nails is the largest nail salon chain in the United States. When Bo Van Huynh founded the first Regal Nails salon, he teamed up with "Charlie" Quy Ton, who expanded the salon into big box retailer settings.[110] Almost all Regal Nails locations are independently operated, local franchises. The chain aims to provide customers with affordable and quality services.[111] Ton also owns two nail-supply companies, Alfalfa Nails Supply, which in 2006 served about 10,000 techs, and T4 Spa.[112]

Legal issues: In 2003, Regal Nails salon had a customer lawsuit for $2 million. Also, it had an issue with not being properly registered as a franchise with the state of Washington.[113]

DaVi Nails

Year founded: 1995
Number of Nail Salons: Over 200
Locations: Malls and major chain retailers, such as Walmart, in the US
Parent company location: West Valley City, Utah
Services: Manicures starting at $10, pedicures, sculptures, fiberglass, air brush, tips

DaVi Nails, formerly California Nails, appears to be the second largest nail salon chain in the United States.

Legal Issues: DaVi Nails offers franchising services through direct sales and its website; however, multiple lawsuits in states like Wisconsin and California forced the company to desist and refrain, as it had not registered as a franchise with the state.[114]

In 2009, the owners of one salon, affiliated with a Walmart in Pennsylvania, pled guilty to trafficking two nail salon workers from Vietnam. The salon workers lived in the salon owners' home and worked every day at the salon without pay, under threat of being reported to immigration.[115]

Happy Nails

Year founded: 1983
Number of Nail Salons: Almost 60
Locations: Chain retails stores in Southern California
Parent company location: Tustin, California
Services: Basic manicures from $15, waxing, threading, skin care

Mai and Henry Huynh first started **Happy Nails** in Newport Beach, after Mai had found work as a manicurist and the couple had saved enough money.[116] The salon brands itself as "homey" and "family run" but also "upscale at affordable prices."[117]

Legal issues: In 2003, Happy Nails reorganized its business to make its cosmetologists independent contractors. Over the next several years, the legality of salon workers' independent contractor status was debated, and Happy Nails was charged for unpaid unemployment insurance contributions and itemized wage statement violations. The business however successfully appealed the court decisions, re-establishing its salon staff as independent contractors.[118]

Miniluxe

Year founded: 2006[119]
Number of nail salons: 25
Locations: Boston, Dallas, Los Angeles, Rhode Island[120]
Parent company location: Boston, Massachusetts
Annual parent company revenue: $23 million in investments as of 2014[121]
Services: Manicures from $22 to $47 and pedicures, waxing, and eyebrows

Miniluxe is an up-and-coming higher end nail salon. Partners of venture capitalist investment firm Cue Ball Capital came up with the idea for Miniluxe after being challenged to transform any "fragmented industry . . . into the next Starbucks." Miniluxe aims to become a "fast casual" experience for its customers and uses big data and back-end analytics to predict customer traffic and optimize labor and efficiency.[122] Miniluxe offers pricier services than most other nail salons because the company prides itself on providing a "socially-responsible mani-pedi" with stringent hygiene standards and workplace practices that meet or go beyond minimum labor standards.[123] Miniluxe claims that its employees receive a wide array of benefits, including 401(k)s, monthly bonuses, paid time off, flexible work schedules, paid vacations, and health, dental, and vision insurance.[124]

PART 3: INDUSTRY OVERSIGHT AND ENFORCEMENT

In the United States, the nail salon workplace is governed by federal and state regulatory bodies, legislation, and other rules; county and local policies and programs; and state and federal court decisions. Health and safety and labor regulators play a key role in oversight of the nail salons. Unfortunately, nail salon workers' exposure to labor violations, as well as chemical, biological, ergonomic, and other hazards, is exacerbated by insufficient or limited health and safety laws and inadequate enforcement of existing laws.[125]

In this section, we describe the various regulatory bodies, policymaking/legislation, and community organizing and advocacy that pertain to nail salons. Because agencies, systems, and laws vary state by state, we present models from New York and California as examples of how states and local jurisdictions can provide oversight in nail salons.

Federal and State Regulatory Bodies

Various federal and state agencies are responsible for ensuring safe working conditions in nail salons and the agencies vary state by state. The following are the agencies that oversee labor conditions, workplace health and safety, environmental health, and chemicals/toxicity in nail salon products. The examples below of California and New York show that there are some state agencies with their own labor, health and safety, and product oversight. In addition, they also have licensing boards that provide additional requirements, support, and services for the industry, unlike the federal level.

Services Provided	Federal Agency	State Agency (NY and CA)
Licensing: Oversee and provide licenses to nail salon workers; conduct inspections; provide educational materials, complaint forms, and workers' rights information.		• California Board of Barbering and Cosmetology (BBC) • New York Division of Licensing Services (DLS)
Labor: Enforce labor laws, combat wage theft and retaliation, manage wage and hour complaints.	• U.S. Department of Labor (DOL)	• California Department of Industrial Relations/Division of Labor Standards Enforcement (DIR/DLSE) • New York State Department of Labor (NYSDOL)
Health and Safety: Address workplace hazards such as unsafe inadequate air ventilation, exposure to hazardous products and workplace injuries; conduct relevant research; make recommendations; and provide guidance around health and safety for workers.	• U.S. Environmental Protection Agency (EPA) • U.S. Department of Labor/ Occupational Safety and Health Administration (OSHA) • Center for Disease Control Protection (CDC)/ The National Institute for Occupational Safety and Health (NIOSH)	• California Department of Industrial Relations/ Division of Occupational Safety and Health (Cal/OSHA) • California Environmental Protection Agency (CalEPA)/ California Air Resources Board (CARB) • New York State Department of Health (NYSDOH)
Products: Regulate products and labeling disclosure (though products still have limited warnings), provide toxicology profiles of products and product information sheets, research chemicals in nail products.	• Food and Drug Administration (FDA) • Department of Health and Human Services (DHHS)	• California Environmental Protection Agency (CalEPA)/ California Department of Toxic Substances Control (DTSC) • California Department of Public Health (CDPH)

Challenges in Enforcing Labor Rights

There are challenges in addressing labor issues in the nail salon industry. A *New York Times* article found that the New York State Department of Labor often only responded to worker complaints rather than initiating their own investigations. When workers file claims against owners, owners often file for bankruptcy, claiming that they do not have enough money to pay judgments.[126] The New York State Nail Salon Industry Enforcement Task Force was created to confront labor violations in the industry after the *New York Times* article. Its investigations have revealed that immigrant owners often do not understand state labor laws, resulting in one of the greatest barriers to improving workers' rights. That task force also found that nail salon workers mistrust investigators, and a common industry practice of off-the-books record-keeping create situations where workers self-report their wages, often in front of their employers, and risk retaliation.[127]

The California Department of Industrial Relations contracted with the Labor Occupational Health Program (LOHP) at the University of California, Berkeley, to conduct stakeholder meetings with nail salon owners and workers. LOHP found that workers lacked information or had received misinformation about labor laws and that owners only loosely followed labor laws out of concern about the cost of compliance.[128]

Labor claims are still low, and labor agencies can do a better job of investigating labor violations and enforcing labor standards. The DOL received just 273 complaints for the whole country from 2005 to 2018. California investigated 291 salons, issued 194 citations, and opened 115 nail-salon wage-claim cases between 2011 and 2016. In 2015, Connecticut had 23 stop-work orders at nail salons for wage violations as well.[129] The New York State Nail Salon Industry Enforcement Task Force uncovered 652 wage violations in 143 nail salons in a single year—between May 2015 and May 2016. In 2016, the task force directed 143 nail salons to pay $2 million in unpaid wages and damages to 652 employees.[130] These are positive efforts, but the agencies could be further staffed up to expand enforcement.

Source: California Healthy Nail Salon Collaborative

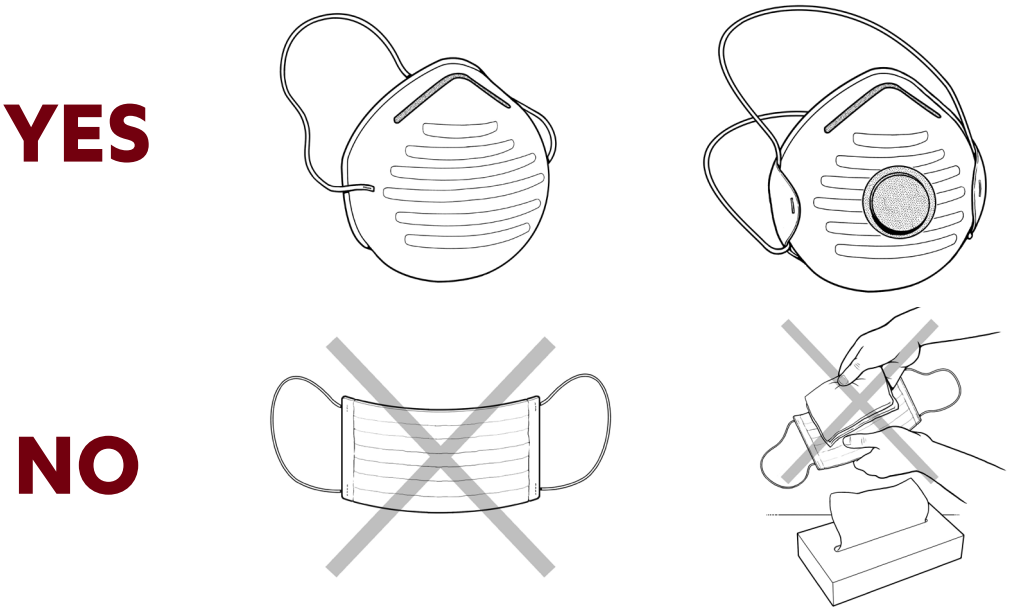
Challenges in Enforcing Health and Safety

There are also continuing challenges in ensuring safe and healthy conditions in nail salons. Federal organizations can conduct more research on the environmental effects of chemicals and hazardous exposures found in nail salon products and push for more legislation, such as those to control toxins that are released into the air.

OSHA requires employers to provide Safety Data Sheets for products used in the salon that contain toxic chemicals. In one study, about half of workers stated they were not familiar with the Safety Data Sheets, which is consistent with the findings that training about workplace hazards and safety information access is limited in Vietnamese nail salons.[131] Many workers are not trained in safe chemical handling,[132] partly as a result of of OSHA's lack of implementation and enforcement. In addition, OSHA's permissible exposure limits (PELs) for chemicals commonly used in nail salons are outdated, some going back to the 1970s.[133] Furthermore, OSHA has done little to investigate worker health conditions or create a plan to implement and enforce updated PELs.[134]

The FDA's mandate is to ensure the safety of products that go on the market. Yet the FDA allows products that contain potentially harmful ingredients to be sold if the products are deemed safe by the manufacturers when used as directed—applied to nails rather than ingested.[135] Unfortunately, the FDA's mandate does not take into account how many chemicals found in nail salons can affect workers through multiple exposure routes, as well as synergistic and long-term exposure.[136]

On the state level, the California Department of Toxic Substances Control could improve protocols and coordinate and contribute to efforts across local municipalities to ensure that nail salons are incorporated into Health Nail Salon programs (see below). The California Department of Public Health has not reevaluated or updated safer PELs, and Cal/OSHA, which can regulate toxic chemicals, has not done so.[137] Additionally, although Cal/OSHA standards require all California employers to have an Injury and Illness Prevention Program to assess and address safety and health hazards in the workplace, the agency does not have enforcement guidelines.[138] An analysis by the California Board of Barbering and Cosmetology (BBC) has noted that the agency has an insufficient number of inspectors, conducts inspections infrequently, and does not explain the reasons for citations to workers and owners.[139] Another study found that owners felt that the BBC site audits are not transparent or fair.[140] Workers have described interactions with BBC inspectors as threatening and causing fear, nervousness, and a sense of vulnerability.[141]



Source: California Healthy Nail Salon Collaborative. Illustrations by Mary Ann Zapalac

Municipal Programs

There are many programs in local jurisdictions, with volunteer or elected staff, designed to improve working conditions in nail salons. We highlight a few here but want to acknowledge there are many other programs throughout the United States.

- **Healthy Nail Salon Recognition Programs:**

  - In California, counties and cities have voluntarily implemented the Healthy Nail Salon Recognition Program (HNSRP), which follows a nine-point plan to ensure healthy workplace practices, including safer nail polishes and products, ventilation, and staff training.[142] Nail salons voluntarily register to join the program and become "Healthy Nail Salons." There are HNSRPs in the counties of Alameda, San Mateo, and Santa Clara, the City of Santa Monica, and the City and County of San Francisco.[143]

  - King County, Washington, offers a program to recognize healthy nail salons, similar to California's. Salons voluntarily register to join the program and become healthy nail salons once they satisfy certain requirements. Salons that follow a smaller set of requirements are designated as "three-star" healthy nail salons, and salons that satisfy a greater number of requirements are ranked with four or five stars.[144] King County's HSNRP falls under its EnviroStars program, which aims to promote green practices in different businesses.[145]

- **Green and Clean Program:**

  - Boston has the Green and Clean Program, which recognizes nail salons, along with hair salons and auto shops, for participating in the program. The program follows a four-point "leaf" system. In order to participate and get one leaf, nail salons must meet the program's minimum requirements, including employing one Green and Clean practice and one method of reducing chemical exposure along with not using nail salon products with certain chemicals. Salons that do more to reduce chemical exposure and protect the environment are awarded up to four leaves.[146]

- **New York City Public Advocate:**

  - The New York City Public Advocate is a citywide elected position, first in line to succeed the mayor. In 2014, the public advocate released a report on the dangerous sanitation conditions and worker safety issues at nail salons.[147] The advocate's office also introduced a program to fit quality sensors, which would monitor chemical levels in the air, on nail salon desk lamps.[148]

Source: California Healthy Nail Salon Collaborative

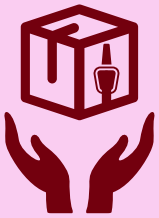
Legislation and Policies

State legislation and policies can provide improvements in areas such as language rights, labor protections, health and safety protections, and industry standards, but only if there is adequate enforcement. The following are examples of legislation in New York and California. Many efforts in New York emerged out of statewide emergency regulations that came out of the Nail Salon Task Force.

- **Language Justice:** Communities have led efforts to push states to enact more language justice policies—particularly for nail salons that have immigrant and limited-English-speaking workers.[149] In 2014, California passed the Dymally-Alatorre Bilingual Services Act (AB 2253) to ensure agencies had staff and materials/forms in languages other than English. Two years later, the Labor Law Education Requirements (AB 2025) increased language access to information and materials, including labor issues, through the BBC. In 2015, New York passed emergency regulations for nail salons that included free English classes and licensing in multiple languages.

- **Labor:** The 2016 California Labor Law Education Requirements (AB 2025) included workers' rights education for BBC-licensed owners of establishments and for all BBC-licensed professionals.[150] The 2018 California Supreme Court decision Dynamex Operations West, Inc. v. The Superior Court of Los Angeles County makes a distinction between a worker and an independent contractor using the ABC test, discussed in this report's misclassification section. In New York, a set of legislation and emergency regulations in 2015 strengthened workplace conditions in nail salons by mandating a) the posting of the nail salon workers' bill of rights, b) cease and desist postings, c) a governor's task force to combat worker exploitation, comprised of 10 state agencies, e) new bond and insurance requirements, f) authority to shut down businesses that violate the law, and g) training and job resources for workers.[151]

- **Health and Safety**: California Assembly Bill 2125, passed in 2016, created guidelines to help localities establish Healthy Nail Salons as part of the Healthy Nail Salon Recognition Program.[152] New York's personal protective equipment and ventilation regulation requires owners to provide safety equipment and to post a sign that states the workers' right to demand and wear gloves and masks.[153]



- **Product Safety:** The California Safe Cosmetics Act, passed in 2005, requires cosmetics manufacturers to report chemicals found in their products that are known carcinogens or reproductive toxicants to the CDPH.[154] Unfortunately, not all companies comply; they may fail to update the database when products are reformulated, incompletely disclose ingredients under the guise of "trade secrets," and/or remove ingredients without citing a reason. The extent of noncompliance is difficult to assess,[155] and the database may not include reportable ingredients for all products because of weak enforcement, limited funding, and lack of coordination and public data on ingredients.[156] However, California Assembly Bill 2775, recently passed in August, 2018, requires manufacturers to include all ingredients on the label of professional cosmetics manufactured on or after July 1, 2020. This is the first bill of its kind passed in the country.

Nail Salon Organizing and Advocacy

Nail salon advocacy over the past decade has helped to improve working conditions and provide healthier workplaces. Many of the efforts to improve nail salon conditions mentioned here have resulted from worker-led, community organizing and advocacy. Though such efforts have occurred across the United States, for this section, we focus on California and New York.

- **California Healthy Nail Salon Collaborative:** The Collaborative was founded in 2004 when the organization Asian Health Services first noticed consistent health issues in nail salon workers.[157] Seeking to address the health issues from breathing issues to cancer, the Collaborative has mobilized workers, owners, and organizations throughout California focused on supporting healthy workplaces, advocating for safe cosmetics and beauty products, increasing nail salon workforce leadership, and protecting workers rights. The Collaborative successfully advocated for counties and cities to adopt the Healthy Nail Salon Recognition Program. Almost 200 nail salons across the state have voluntarily become certified as Healthy Nail Salons.[158] The Collaborative has also advocated for the translation of fact sheets, forms, and the licensing process into Korean, Spanish, and Vietnamese, with the BBC. Additionally, the Collaborative has advocated for the BBC to require workers' rights education for all new BBC licensed professionals.

- **New York Healthy Nail Salons Coalition (NYHNSC):** The NYHNSC was founded in 2014 as a coalition between Adhikaar and the New York Committee for Occupational Safety and Health, with Workers United, SEIU (Service Employees International Union) joining in 2015. The coalition focuses on worker-led strategies for labor rights, reproductive health, occupational health, and public interest law.[159] Member organizations have studied and tracked workers' health symptoms at nail salons, conducted safety trainings, held workers' forums, and advocated for language justice for the licensing process. Since the establishment of the 2015 New York emergency regulations, the coalition has advocated for better translation of materials, the Nail Salon Workers' Bill of Rights, and a wage bond. In spring 2016, the coalition held a workers' congress for just jobs.

CA Healthy Nail Salon Collaborative staff and nail salon members meeting with policy champion Assemblymember Kalra, the author of AB 2775. Source: California Healthy Nail Salon Collaborative

Staff from Immigrant Resettlement and Cultural Center (IRCC) in San Jose, CA providing free health, safety and labor rights information to a nail salon worker. Source: California Healthy Nail Salon Collaborative

Advocacy Day in Sacramento in support of AB 2775! Our coalition included Vietnamese nail salon workers, African American hair stylists, and organizations including the CA Healthy Nail Salon Collaborative, Black Women for Wellness, Women's Voices for the Earth, Breast Cancer Prevention Partners, and BeautyCounter. Source: California Healthy Nail Salon Collaborative

Healthy Nail Salon Recognition Program. Source: California Healthy Nail Salon Collaborative

Recommendations

Nail salons are a thriving and growing industry shaped by immigrant entrepreneurship and industry innovation that has made what was once an exclusive luxury service accessible for most. As the industry expands and is reshaped by new technologies and models, we must continue to ensure safe and quality jobs for the workforce. While there are numerous agencies and policies that regulate the sector, there continues to be a need to strengthen enforcement efforts of existing laws and expand protections for workers.

The following are recommendations to ensure labor protections and standards as well as continue to advance policies and practices that create environmentally safe and healthy salons for workers and consumers alike. Below, we summarize the recommendations by potential actors.

1. Ensure quality jobs and labor protections for nail salon workers.

Agencies

- 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, which deprives workers of workplace benefits and protections and the right to organize.
- Mandate safety, health, and workers' rights training for employers at salon openings, and repeat on a regular schedule.
- Allow penalized workers and owners to take continuing education courses in exchange for eliminating regulatory violation penalties.
- Address language barriers in educational and know-your-rights materials and allow workers to speak in their own languages in the salon.

Policy makers

- Expand worker protections and policies that improve job quality, including fair wages, safer workplaces, and access to benefits.
- Remove barriers to licensing for workers by removing immigration status requirements, making exams available in relevant languages, such as Nepali and Tibetan, and allowing alternative testing for those unable to read or write.
- Address gaps in government data that does not fully capture the experiences and demographicsof nail salon workers. Ensure workers feel comfortable and safe taking government surveys, and encourage employers to report all workers. Create occupation categories specific to nail salons, and ensure demographic data is being captured by all states.

Advocates

- Develop a continuing education program and curriculum that provides workers with the skills to advance.
- Provide culturally and linguistically appropriate education to workers and owners about labor and employment law.

Employers

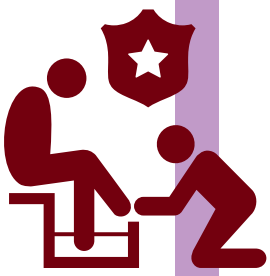
- Create pathways for workers to increase their skill sets and provide opportunities for wage increases.

Researchers

- Support the National Scientific Advisory Committee, which provides technical guidance on future research efforts created by the California Healthy Nail Salon Collaborative and National Healthy Nail and Beauty Salon Alliance.

- Conduct a study that examines the labor conditions of nail salon workers more in-depth and on a national level.

2. Guarantee enforcement of workplace protections.



Agencies

- Provide culturally and linguistically appropriate outreach to educate workers about their rights and employers about their legal responsibilities.

- Address barriers to filing claims, such as protecting workers from retaliation and intimidation for speaking up and considering new approaches, such as language-accessible tip lines to report nail salon labor, safety, or health violations.

- Allay workers' fear so that they feel confident in demanding better wages and labor rights.

- Create a model for independent contractor agreements and related educational materials to help employers and workers understand and correctly classify workers as independent contractors.

- Create government-community partnerships by funding community organizations that are better able to build trust with workers to provide necessary information.

Advocates

- Give workers decision-making power and substantive leadership positions in advocacy organizations.

- Ensure that organizing initiatives represent the needs of the broad population of workers.

- Create multi-stakeholder collaborations that create high-road labor practices, such as comprehensive education outreach programs that include labor and workers' rights issues and government-community partnerships to conduct joint enforcement efforts and building stronger worker-owner collaborations.

- Engage and learn best practices from other campaigns, industries, and regions that can be applied to the nail salon industry.

Researchers

- Conduct further studies to better understand working conditions, labor issues, enforcement efforts, and other needs of the sector, particularly experiences not captured in public government data sets.

3. Support high-road businesses and good employers.

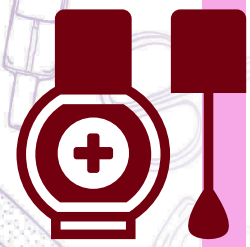
Agencies and Advocates

- Create programs for salon owners on how to run financially and environmentally sustainable, healthy, and just businesses.
- Educate nail salon consumers on why it is important to pay a fair price for nail services.
- Create public campaigns that educate customers about nail salon fair and healthy working conditions and safer beauty product alternatives.
- Use technology and crowdsourcing to elevate high-road salons through methods such as online salon ratings.

Employers

- Meet with other good employers in the sector to share best practices and business models.

4. Assure health and safety of nail salon workers.



Agencies

- Expand healthy nail salon programs that are culturally and linguistically appropriate, raise awareness about safer products and practices, provide health and safety trainings, conduct outreach to workers, and provide informational materials to reduce worker exposure.
- Run health and safety awareness campaigns for nail salon workers and require health and safety education during the licensing process.
- Use worker health outcomes as indicators of safety, instead of possibly outdated exposure limits.

Policy makers

- Require cosmetic manufacturers and distributors to conduct further studies and provide proper labels on chemicals in nail salon products that may be hazardous.
- Require cosmetic manufacturers to make products safe by ending the use of harmful ingredients in products.
- Provide access to health care for workers who are particularly vulnerable to health issues in the industry.

Advocates

- Continue to engage workers on health and safety issues and best practices through participatory and peer-to-peer programs.

Employers

- Participate in healthy nail salon programs that include guidelines on and support in creating a healthier workplace.

Researchers

- Continue to conduct and expand research on the cumulative effects of chemicals and exposures on worker health.
- Continue to conduct and expand research on green chemistry to reduce the use of hazardous substances in products and ultimately improve the health and safety of consumers and workers.

Technical Appendix

Worker Estimates

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

- Bureau of Labor Statistics, United States Department of Labor, Occupational Outlook Handbook 2016, Manicurist and Pedicurist.

- United States Census Bureau, American Community Survey 5-year estimate 2012–2016 retrieved from *IPUMS-USA, University of Minnesota, www.ipums.org*.

    - The sample does not have a specific manicurists and pedicurist occupational variable; these workers are included in the broader category of personal appearance workers. We used the occupational variable, 4250-Personal appearance workers, and limited it to only occupations in the industry, 8990-Nail salons and other personal care services.

    - National, state and county estimates encompass workers over the age of 16 and currently in the labor force.

In addition, we requested data from the California and New York state boards that oversee licensing for the industry.

- California Board of Barbering and Cosmetology Licenses, 2017, Manicurists, Current License.
- New York State Department of Labor, 2018, Nail Specialty License.

Worker Characteristics

We used United States Census Bureau American Community Survey 5-year estimate 2012–2016 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 (except for the labor force and unemployment data points), over the age of 16 and living in the United States.

Low Wages

For wage data, we limited our analysis to those between 18 and 64 years old, who earned a wage, were not self-employed or unpaid family workers, currently work more than three hours a week for at least 14 weeks in the past year, and live in the United States. In computing the hourly variable for the ACS, we followed standard practice.[160] Using a standard metric, we define low wage as less than two-thirds of the full-time median wage.[161] The United States median hourly wage for full-time workers was $20.18 in 2016, so low wage is $13.46.

Worker Profiles

Two summer interns for the California Healthy Nail Salon Collaborative conducted twelve interviews between June and July 2018. The interview guide inquired in the areas of family background, reasons for employment, wages, workplace harassment and abuse, occupational health and safety, training, and future goals. We conducted interviews in English and Vietnamese. The interns recruited interviewees through their personal networks, outreach efforts at nail salons and community events, and the Collaborative's network. The interviews were summarized and analyzed for common themes.

Industry Data

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

- US Census Bureau, County Business Patterns 2016
- Quarterly Census of Employment and Wages 2017
- US Census via Statista 2008–2020
- BizMiner Industry Financial Profile 2016

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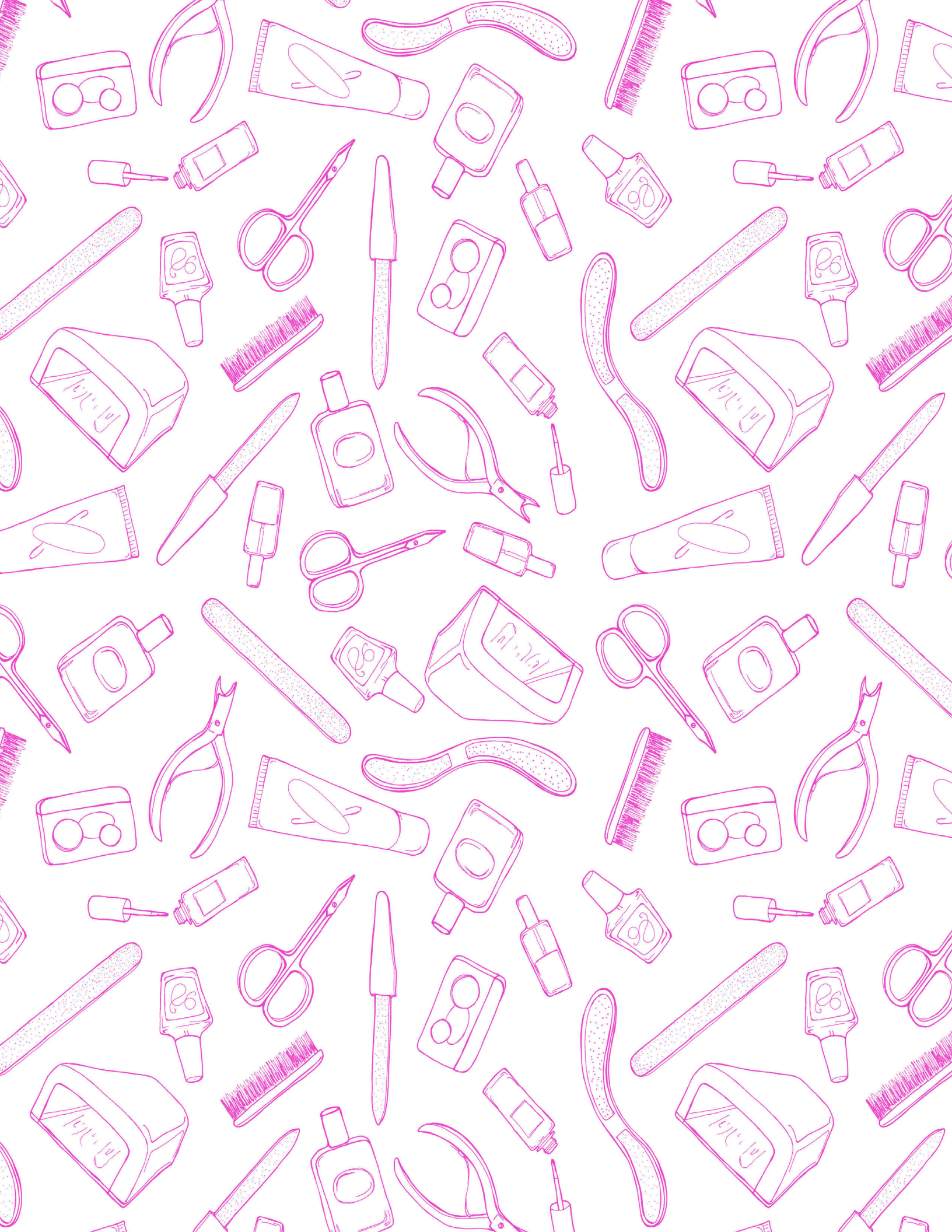
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