

# LICENSING A LEGACY

African Hair Braiders' Vision for Reforming  
Professional Licensure in New York City



**AFRICAN  
COMMUNITIES  
TOGETHER**



**TAKEROOT  
JUSTICE**



# ABOUT THE AUTHORS

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**African Communities Together (ACT)** is an organization of African immigrants fighting for civil rights, opportunity, and a better life for families here in the U.S. and worldwide. ACT empowers African immigrants to integrate socially, get ahead economically, and engage civically. ACT connects African immigrants to critical services, helps them develop as leaders, and organizes our communities on the issues that matter.

**TakeRoot Justice** partnered with African Communities Together to conduct this research. TakeRoot provides legal, participatory research and policy support to strengthen the work of grassroots and community-based groups in New York City to dismantle racial, economic and social oppression. TakeRoot's Research and Policy Initiative partners with and provides strategic support to grassroots community organizations to build the power of their organizing and advocacy work. We utilize a participatory action research model in which low-income and excluded communities are central to the design and development of research and policy.





# ACKNOWLEDGEMENTS

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# INTRODUCTION

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Hair braiding is a profession largely by and for Black women. It represents an integral part of many African cultures. Braiding is a social art, often practiced in small gatherings where elders braid hair and children learn by watching. African women learn the skill at a very young age by practicing on each other in order to beautify their hair and protect it from damage. Hair braiding is a part of cultural heritage for African women. It is, as one hair braider put it, “a legacy left to us by our grandmothers.”<sup>1</sup>

For many African immigrant women hair braiding is also the most accessible employment and the most marketable skill they can use to earn a living to support their families here and back home. Even African women with barriers to traditional employment or business ownership, such as limited English proficiency and literacy, irregular immigration status, and minimal capital, have been able to achieve self-employment and earn a dignified living.

However, working as a hair braider in the United States is not as simple as one would think. African immigrant hair braiders are a marginalized workforce facing numerous challenges. Braiders must navigate the racism and xenophobia of the United States as well as regulatory and structural barriers to practicing their craft.

For African Communities Together (ACT), the ability of African hair braiders to earn a dignified livelihood while having their profession and experience respected by clients and industry standards is a critical issue. As we spoke with hair braiders among our membership and beyond, they identified a pervasive challenge: the inability to access the professional license needed for their work. This license, the Natural Hair Styling license, was out of reach for many of our members due to a range of factors, including English proficiency, literacy, the time and cost of the associated training programs, and the difficulty of navigating the bureaucracy needed to obtain documentation from their home countries required for a waiver.

ACT partnered with TakeRoot Justice to conduct a participatory action research project focused on hair braiders’ access to licensure. We conducted 346 surveys from July 10th to August 17th 2018 and from March 1st to March 15th 2019, held three focus groups with hair braiders, and conducted policy research on the issue. In addition, we identified six braiders among those surveyed and conducted in-depth interviews with them about their particular experience with braiding and the process to licensure. Our research demonstrates that the current system of licensure in New York State is impenetrable to hair braiders, leaving the great majority in the position of working without a license.



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We found:

**Surveyed hair braiders want licenses, and feel the pressure and fear of being unlicensed.** They are concerned about the fact that they are unlicensed, which leaves them vulnerable to theft of services and steep penalties from authorities for license violations.

**The State licensing process imposes significant barriers on braiders who want to obtain a Natural Hair Styling license.** Most braiders lack information about the requirements to apply for the license. Barriers like language access, literacy, and the time and cost of training programs put the license out of reach for many.

Our research was conducted before the COVID-19 pandemic hit New York City and our communities. In light of COVID-19, our findings become even more salient. New York State on PAUSE, the executive order that closed all non-essential businesses on March 22, 2020, meant that hair braiders could no longer work. During the shutdown, ACT was in touch with hundreds of braiders who we assisted with navigating unemployment and pandemic assistance relief programs, small business counseling, and other emergency assistance. Braiders shared with us the numerous challenges of navigating this professional and personal crisis, trying to access supports and benefits, and living with anxiety about the future of their profession.

As New York City prepares to reopen amid great uncertainty and in a faltering local and national economy, removing barriers to work is more important than ever. Braiders can likely anticipate increased scrutiny of their industry, as important health and safety measures will be implemented to protect both braiders and their clients. This also represents an opportune time to implement reforms that will allow braiders to achieve professional licensure, allowing them to return to work not only with physical safety, but with professional security and dignity.

Nationally, there has been growing momentum to reform state licensing of hair braiders. Some states, like New Jersey, have moved from requiring hair braiders to obtain a full cosmetology license to requiring a less burdensome hair braiding license.<sup>2</sup> Iowa eliminated the requirement that braiders obtain a license, and now merely requires them to register with the state.<sup>3</sup> Other states, including New Hampshire, Indiana and South Dakota, have entirely deregulated the braiding industry.<sup>4</sup>



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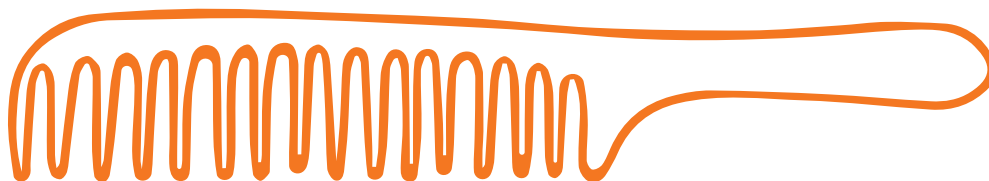
New York's African braiders want licenses, but want them to be much more accessible. Surveyed braiders called for the barriers to licensure to be reduced, and for support to be put in place for those seeking to obtain licenses. We call on the Secretary of State to:

- Improve access to information about licensure. Ensure that braiders know the license exists, that they have in-person access to information about the licensing process, and that information is accessible to people with limited English proficiency and with limited literacy in their primary languages.
- Revise the course and examination requirements for licensure and require only health and safety curriculum for experienced braiders.
- Streamline the process by which experienced braiders document prior experience.
- Build the license application process into the course of study.
- Dedicate resources and conduct concerted outreach to expand the roster of course providers.
- Allow for use of the New York City Municipal ID card as the form of identification for the application process, and eliminate the requirement of a social security number or Federal ID number.
- Appoint natural hair stylists to the vacant seats on the Appearance Enhancement Advisory Committee, including at least one African hair braider.
- Convene a task force on theft of services, including hair braiders and representatives from the Department of State.
- Provide funding for targeted literacy programs to braiders with limited literacy.
- License inspection and ticketing should be suspended during this time of COVID-19.

These recommendations and more are detailed in this report, along with the findings of our research.



# BRAIDER PROFILE: D



D comes from a family of hair braiders and learned how to braid from her mother, who once owned a salon in New York before she returned to Senegal. D has been braiding hair for almost 20 years and braiding is her main source of income. Since the COVID-19 pandemic started, she has been home unable to work.

The pandemic's financial and emotional impact has affected D's identity as a hair braider. She questions her career path and wonders whether she'd be "in this situation if I continued and finished my education. Financially, I am struggling, there is no income coming in. I am thinking that if I was documented and had my degree, I would be doing another job, and might still be working right now or be able to file for unemployment and have some type of income to support my family."

She remembers the culture of hair salons and knows that new rules and requirements will change how people interact, "the doors of the salon were always open, and anyone could come in and we used to sit next to each other. There used to be so many clients in the waiting area and there was a vibrant ambiance. Now, there will be rules that we will need to apply in which we will have to maintain a certain distance, wear masks and not allow many people in."

In addition to the uncertainty of the braiding industry in the aftermath of the pandemic, the licensure process remains a barrier. "At this point, we are worried about going back to work and earning some income," D says. "The requirements to get the hair braiding license are very difficult. We have been sitting at home for almost 4 months with no income, we are ready to go back to work."

D notes that the City could show hair braiders that they are respected and valued by "making the license available for every braider. With an easy access to the license, we can work legally and be proud of what we are doing. They can also help us towards a path to getting our immigration papers." D thinks that the barriers to obtaining licensure should be reduced by lowering the cost of obtaining the license, eliminating the requirement for a social security number, and reducing the number of hours it takes to obtain a license. She knows that "many braiders have been doing this for a long time. They already know what they are doing. Braiding is like an art and people need us."

**"Braiding is like an art and people need us."**



# OVERVIEW OF THE NATURAL HAIR STYLING LICENSE IN NEW YORK

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New York State requires a Natural Hair Styling license for professional hair braiders and other hair styling professionals who perform services such as “arranging, dressing, twisting, wrapping, weaving, extending, [or] locking the hair.”<sup>5</sup> In contrast to natural hair styling, chemical practices such as applying dyes, “reactive chemicals or other preparations to alter the color or to straighten, curl or alter the structure of the hair” do not fall within the purview of the Natural Hair Styling license and require a cosmetology license.<sup>6</sup>

Some states (nine at the time of this writing) require that hair braiders obtain a cosmetology license for their work, which usually requires at least one thousand hours of coursework, which, in many cases, follows a curriculum that covers little, if any, material relevant to natural hair styling.<sup>7</sup>

While New York’s Natural Hair Styling license does not require braiders to navigate the full cosmetology licensure process, this alone is not enough to make the professional path accessible to braiders. Our research, detailed in the following pages, demonstrates that African hair braiders face significant barriers to obtaining the license.

To apply for the Natural Hair Styling license, applicants must be at least 17 years of age, and:

- Undergo a physical examination by a physician or nurse.
- Provide a social security number or Federal ID number, or a written explanation of why they do not have the number.
- Complete a 300-hour approved course of study and pass both written and practical exams at the state level *or*
- Document that they have received equivalent education outside of New York State *or*
- Document that they have five years of professional experience in an occupation equivalent to natural hair styling.
  - For applicants whose five years’ prior experience was outside the United States, this documentation entails: a certificate of licensure or a letter from their consulate which certifies that licensure is not required for natural hair styling in their home country; detailed letters of recommendation from clients and employers, including precise dates and location of employment; and a copy of their passport and tax returns which indicate natural hair styling as an occupation.<sup>8</sup>



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- Braiders consistently stated that obtaining the level of documentation required to waive the requirement for 300 hours of coursework is impractical and unrealistic. When we described to braiders the requirement to go to their consulate and request a certification regarding hair braider licensing in their home country, they generally responded with laughter at the idea.

Natural Hair Styling licenses are administered by the Department of State, with the Secretary of State holding authority over the licensing process. A New York State Appearance Enhancement Advisory advises the Secretary of State on rules, regulations and curriculum related to appearance enhancement. This advisory committee is intended to have nine members who are “broadly representative of the appearance enhancement industry, including...two persons engaged in natural hair styling.”<sup>9</sup> However, at the time of this report, a number of seats on the Appearance Enhancement Advisory Committee were vacant, including both seats for natural hair stylists.<sup>10</sup> This leaves African hair braiders without representation on the body that advises on regulation of their industry.

In addition to the natural hair styling license, New York State also requires an Area Renter License for natural hair stylists who work in a natural hair styling business but are not employed by the owner. While our research did not focus on the Area Renter License, it is important to note that this is an additional requirement which may come with barriers similar to those identified by our research.

Official data about hair braiders and salons in New York State are extremely limited, and the data that do exist are incomplete. A search in the New York State License Center Database yields only 630 licensed hair braiders in New York State.<sup>11</sup> This is certainly only a small fraction of the number of people who are working as hair braiders: our canvass for this survey project yielded more than half that many unlicensed braiders.

To find out the barriers hair braiders face in New York State’s licensing process and how the process could be improved, African Communities Together surveyed hundreds of New York City’s African hair braiders. This represents what is, to our knowledge, the most comprehensive survey of braider’s experiences with licensure.



# BRAIDER PROFILE: AWA DOUMBIA

**"The process is too long for something we already know. There is no added value, we already know how to braid. It doesn't make sense to go take a long class to get a diploma for something you have already mastered."**

Awa Doumbia is from Mali, and has lived in New York City for 19 years. Awa owns a salon, and appreciates the flexible schedule of hair braiding: "This job gives me time to better take care of my 3 children," she says. Awa's grandmother was also a salon owner. "My grandmother would be proud," Awa says of her own salon ownership.

Awa has faced difficulties with the city when it comes to salon ownership. She was once ticketed for failing to post a refund policy, though the policy was only temporarily removed from a wall that was being painted. "I had the refund [policy] with me but I didn't display it because I was painting the wall. I tried to explain to the lady in vain, but she gave me a \$500 fine, and she explained if I wasn't happy I could take it to court. Which I did." This was not the only time Awa had to go to court to stand up for her rights. "I went to court so many times," she says. I went to court for garbage issues with the city. I pay my landlord to take my garbage out, and they don't take it out, and the city officers gave me tickets twice. Every time they gave me a ticket, I go to court. I felt assaulted, discouraged and stressed. I have only this income and I have to budget everything. I can't give up because I have three small children so I have to continue working."

Of the licensure process, Awa says, "The process is too long for something we already know. There is no added value, we already know how to braid. It doesn't make sense to go take a long class to get a diploma for something you have already mastered. It will be best if the classes are shorter." She also notes that language and literacy are also barriers to braiders obtaining licenses, and leaves them subject to discrimination and vulnerable to exploitation.

Awa says that lack of licensure is compounded by racism, leaving braiders and salon owners little recourse if customers do not respect them or violate salon rules. "There is no respect and there is still racism in this country. When you say you are African, they have no respect for you. In the Americans' salons, if they say no strollers or no pets allowed, everyone respects that. But in our salons, when we say no alcohol and pets, they don't respect it. There is no respect and there is a lot of racism." Awa remains passionate about braiding, even in the face of the racism she faces in the workplace. "I have to add this: I really love my job. That's why I'm still doing it."

*Interview conducted prior to the COVID-19 pandemic.*

# METHODOLOGY

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African Communities Together (ACT) with the support of TakeRoot Justice, used the following methods for this participatory research project.

## **Surveys**

ACT surveyed 346 African immigrant hair braiders working out of salons in New York City. Surveys explored the experience and opinions of hair braiders with respect to hair braiding licensure. ACT organizers and members were trained to administer the surveys to braiders. Surveys were administered in French, English, Mandingo and Wolof. Surveys were collected anonymously at 103 salon locations in Manhattan, Brooklyn and the Bronx. Surveying took place from July 10th to August 17th 2018 and from March 1st to March 15th 2019.

## **Interviews for member profiles**

ACT conducted targeted interviews with hair braiders focused on their experiences with the licensure process. These interviews inform the braider profiles throughout the report.

## **Focus groups**

ACT conducted three focus group meetings in Harlem that included a total of 18 braiders. The focus groups were done in English with interpretation in French, Mandingo and Wolof. The focus groups were an opportunity to share preliminary data from the survey with the braiders for reaction and discussion. The focus group also allowed the braiders to share their perspectives on their occupation with us and their needs and hopes for reform. The focus groups informed the report findings, and quotations from focus group participants are used throughout.

## **Literature review and background research**

TakeRoot researchers conducted a literature review of prior reports, media, and other documents related to natural hair styling and licensure in New York City and nationally. Background legal and policy research was also conducted on how natural hair styling is regulated in New York City and elsewhere, the roles and structures of regulatory agencies, and the New York State Board of Cosmetology.

## **A note on existing data on hair braiders in New York**

Most sources do not disaggregate braiders from other appearance enhancement professionals. The Bureau of Labor Statistics (BLS) groups wage data on braiders with data on “barbers, hairdressers and cosmetologists.” And while BLS provides separate wage data on hairdressers and cosmetologists, it is not possible to view wage data on hair braiders alone.<sup>12</sup> The New York City Department of Consumer Affairs has a category for “Salons and Barbershops,” that does not distinguish data on hair braiding salons.<sup>13</sup>



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The New York Department of State makes some limited data available about hair braiders. While it is possible to find data on individual licensed hair braiders, hair braiding business licenses are grouped together with other businesses in a broader category called “Appearance Enhancement Business”<sup>14</sup> which means that it is not possible to ascertain the number of hair braiding salons. As previously mentioned, a search in the New York State License Center Database yields only 630 licensed hair braiders in New York State.<sup>15</sup> This is certainly only a small fraction of the number of people who are working as hair braiders. Our canvass for this survey project yielded more than half that many unlicensed braiders.

### **Research limitations**

ACT prioritized certain geographic areas of focus for the research. Many of the surveys are from Harlem, where ACT is based and where there is the largest known concentration of African hair braiding salons. Additional surveys were collected in Brooklyn and The Bronx, but our research does not extend to other boroughs or the rest of New York State.





# DEMOGRAPHICS OF RESEARCH SAMPLE

## Demographics of Survey Sample (346 total surveys)

Gender n=342	Female	99%
	Male	<1%
Race/Ethnicity n=344	Black	98%
	African (Written in)	6%
Age n=346	Under 18	0%
	18 to 24 years	4%
	25 to 44 years	47%
	45 to 64 years	49%
	65 years or above	0%
Country of Birth n=344	Ivory Coast	36%
	Mali	21%
	Guinea	11%
	Burkina Faso	11%
	Senegal	10%
	Togo	6%
	United States	1%
	Other Country	5%
How long respondent has lived in the United States n=341	Less than 1 year	3%
	1-4 years	11%
	5-9 years	13%
	10-14 years	22%
	15-19 years	31%
	20 or more	21%
Primary Language* n=344	French	69%
	Mandingo, Bambara, Djoula	69%
	English**	34%
	Wolof	11%
	Fulani	6%
	Other	7%
Highest level of education n=342	No formal education	33%
	Elementary/primary school	25%
	Some high school/secondary school	21%
	High school/secondary school graduated (or equivalent)	16%
	Some college/university (1-4 years, no degree)	3%
	Associate's degree or certificate (including occupational or academic degrees)	1%
	Bachelor's degree (BA, BS, AB, etc.)	1%
	Graduate Degree	<1%

\*Respondents could select more than one answer option so percentages sum to more than 100%.

\*\* Note that only 1% of respondents indicated English alone as a primary language. All others who listed English also listed another non-English language.



# FINDINGS

**Finding 1: African hair braiders are a workforce of immigrant women of color. Among those surveyed, hair braiding was a skill learned while growing up, and braiding professionally was a long-term career.**

- **All of the braiders surveyed identified as Black and/or African** (100% identified as Black or African).
- **Nearly all braiders were born outside the US** (99%).
- **Nearly two-thirds of braiders learned how to braid while growing up** (65%). A third had taken a class or apprenticed at a salon in the United States.

**"I learned how to braid hair since (I was) a young girl. I inherited this skill from my grandmother."**

- Focus group participant K.D.

**"Braiding is a legacy left to us by our grandmothers."**

- Focus group participant F.S.

- **Nearly two-thirds of braiders surveyed had been working for ten or more years braiding hair** (65%).
- **Almost 9 out of 10 reported that braiding hair was their only occupation** (89%).

**Finding 2: Nearly all surveyed braiders lacked a license to braid hair in New York and wanted to get one.**

- **93% of braiders reported they did not have a license to braid hair.**
  - 5% had a license to braid hair in New York; 1% had a license in another U.S. state; 2% had a license from another country.
- **Of those who did not have a license, 97% wanted to get a license** to braid hair in New York.
- **The New York State License Center Database yields only 630 licensed hair braiders in New York State, suggesting that the vast majority of New York City braiders are working without a license.**<sup>16</sup> Our survey, conducted at 103 salon locations, yielded more than half that many respondents.

**Finding 3: Informational barriers were a major issue: most braiders either did not know about the Natural Hair Styling license or did not know how to apply for it.**

- 42% of braiders did not know there was a license to braid hair in New York.
- 26% knew there was a license but didn't know how to get it.

**Finding 4: Many of the requirements to obtain a hair braiding license are not accessible to braiders. Nine out of ten braiders reported that at least one of the steps to achieve a license would pose a barrier (89%).** Braiders were asked about the requirements for the licensing application in New York, and whether the requirements would pose barriers. Braiders reported:

- **Time and cost barriers to achieving the education requirements**
  - 83% of surveyed braiders said that completing 300 hours of educational requirements would be a barrier.
  - 77% of surveyed braiders said that paying for training or classes would be a barrier.

**"For me the problem is the money and the 300 hours; time is an issue and the money involved. How can I split the money and my time between taking care of family, business and the hair braiding training? With family and bills I don't have money to afford the training."**

- Focus group participant K.K.

**"Spending this many hours will make us lose customers in learning a skill we already know how to do."**

- Focus group participant O.K.

**"I have been braiding since I was in Africa. I have been doing the profession for 25 years now, so taking braiding classes will be a waste of time because I already know the profession...as for the 300 hours, I have too many responsibilities to commit to that."**

- Focus group participant A.D.



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- **Language and literacy barriers (including reading in primary language):**
    - 80% of surveyed braiders said that it would be difficult for them to understand written information in English about the hair braiding license (47% said it would be extremely difficult; 33% said it would be somewhat difficult).
    - 79% of surveyed braiders said that talking to someone in English about how to get a hair braiding license would be difficult (42% said it would be extremely difficult; 37% said it would be somewhat difficult).
    - 33% of surveyed braiders had no formal education, and another 25% had education through elementary/primary school.

**"I have been trying to learn the ABCs for four years and still struggled, so I cannot do 300 hours of training. Me, my generation, cannot grasp the language as quickly.**

- Focus group participant S.D.

**"I didn't go to school, I don't know how to read or write... many people choose to do hair because they didn't go to school."**

- Focus group participant O.K.

**"Taking the braiding classes in English will be a problem. I only know the English for business, like asking the braiding style and saying how much clients have to pay."**

- Focus group participant B.

**"Even if the materials and classes and exams are in French, it won't help because many of us do not have the basic level of education. We only speak mandingo."**

- Focus group participant F.S.

- **Use of the internet**
  - 64% of surveyed braiders said that accessing an application on the internet would be a barrier

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- **Concerns about explaining immigration status**

- 41% of surveyed braiders said that having to explain their immigration status, which would be required if they do not have a social security number, would be a barrier.

**"A lot of our sisters do not have their papers, and the license requires them to provide such and such documents. If they do not have the papers, they can't get the license. This is the problem. As an African woman, when you come to this country and want to work, braiding is the first thing you do, while you figure out other options if possible. But now, if the license makes it difficult for them to even braid hair, then it gets complicated."**

- Focus group participant A.D.

- **Challenges documenting prior experience.** While the Department of Labor allows for a waiver to document equivalent education or prior experience in lieu of the 300 hour course of study, this documentation is impractical for African immigrants.
  - 32% said that documenting experience from another state or country would be a barrier. However, we suspect this is an undercount of how many people would face difficulties obtaining the information they would need to waive the course requirement. Our conversations with braiders show that obtaining licensing information in their home countries from their consulate would be prohibitively difficult. Consulates typically handle a limited scope of matters such as visas and passports; certifications regarding home country occupational licensing requirements is well outside their typical scope and such requests are unlikely to receive a response. Furthermore, some braiders worked extensively in their home countries but in informal settings that would not yield the type of employer letter of recommendation or other professional certification required for the waiver process.



**Finding 5: Braiders feel the pressure of being unlicensed. Nearly a quarter of surveyed braiders had been asked to show a license. Nearly three-quarters had concerns about the fact that they were not licensed, including concerns about theft of services from customers and being reported to authorities.**

- **24% of respondents were asked to show a license by at least one person.** This includes:
  - 13% who were asked to show a license by an inspector who came to the workplace.
  - 10% who were asked to show a license by a customer.
- **71% of respondents had at least one concern about the fact that they did not have a natural hair styling license.** This includes:
  - 51% who had been concerned that a customer would use the fact that they did not have a license as a reason not to pay.
  - 32% who had been concerned that a customer would report them for not having a license.
  - 23% were concerned that they could not report an issue related to a customer because they didn't have a license.
  - 12% were concerned that a licensed braider would report them for not having a license.

**"We cannot even call the police for these situations because when they come the first thing they ask you is your license number. So calling them will put you in trouble."**

- Focus group participant K.D.

**"We need [the] license to be free in the work we do and not have any fears in order for everyone to respect us."**

- Focus group participant R.N.

**Finding 6: Braiders want to see the barriers to accessing a license reduced and want supports put in place for those pursuing licensure.**

When asked what changes they would like to see made to hair braiding licensing in New York City:

- **90% of respondents wanted it to be easier to get a license.**
- **64% of respondents wanted support for people trying to get a license.**

# BRAIDER PROFILE: DIENEBA OUATTARA



**"We face a lot of racism  
and violence."**

Dieneba Ouattara is from Sikasso, Mali, and now lives in New York City with her husband and four children: two in college, one in high school and one in primary school.

Dieneba used to own a salon in the city.

"There are a lot of problems when you want to open your own salon," she says. "You need to have money before you open your own salon.

You can have problems with the people who rent out a chair at your salon, you can have problems with the clients. I sold my salon because there weren't enough clients. The expense was more than what I was gaining.

Now I'm renting a space/chair here."

"We face a lot of racism and violence,"

Dieneba says of braiders. She notes that conflicts arise when clients try to avoid payment. "This situation happens very often,"

Dieneba says. "Clients come in and we do their hair and at the end they complain, saying that they don't like the style and so on, and refuse to pay. It's a lie; they like the style but they didn't bring money to pay for it. When we call the police, they say to ask the client to pay before we start working on their hair. But we don't like to do that because we want to establish trust between us and the customers.

One time I got into a physical [fight] with a client. I still have the scar. I was a salon owner and a client slapped my employee who was

pregnant and I came between them and she hit me and we got into a fight. I couldn't be there and watch her hitting a pregnant woman especially since I'm the owner." Dieneba notes another instance in which "a client refused to pay and called a boyfriend who came with his gang and a gun."

Dieneba was able to obtain a natural hair styling license in New York as she had already been licensed in Mali, and was able to compile the paperwork to complete the process here. Our research shows that this path to licensure is unobtainable for the vast majority of braiders, which Dieneba knows as well.

"My case [for obtaining a license] is easier compared to my colleagues, but I still fight for all of us."

"I think they have to make it easier for everyone," Dieneba says. The fees and cost of classes should be reduced to make the license accessible. And protections for undocumented workers should be put in place. "It will be good if they can help our sisters who are undocumented," she says.

*\*Interview conducted prior to the COVID-19 pandemic.*



# BRAIDER PROFILE: KADI



Kadi is from the Ivory Coast and owns a hair salon where she works with family members. “The benefits are less now compared to before. I’ve encountered a lot of challenges and I continue to have them,” she says of being a salon owner. Not receiving payment for services rendered is unfortunately common in the industry. “I can braid a client’s hair and the client is facing the mirror, so she sees what I’m doing at all times, but she doesn’t say anything until the end. Then when it’s done, she refuses to pay, and they leave. Not too long ago, I did a client’s hair and at the end she refused to pay, and she texted her friends who came as backup and wanted to break the windows. It was a big mess.” Kadi says.

Ticketing is another issue that salon owners face. Kadi was fined \$1000 for an expired business license on a day that she wasn’t there to defend herself, and she had only two weeks to pay it. “I’m sure it was a language barrier or miscommunication, but they didn’t let my workers speak and they gave me a ticket. They could have chosen to come back another day or give me a warning, but they charged me.” Kadi has faced racism and xenophobia in the work place, and push-back from customers for not having a license. “People do not respect African hair braiders. You know what their slogan is now when a client comes in?

‘America first, we are in our country’ or ‘Do you have a license?’ We accept that [behavior], and it’s not because we like it. But we have to take it because we don’t want to call the police and deal with the whole process because of \$80 or \$90.” I believe the license will help us. It’s a good thing because we [would] get more respect. Clients behave like this because they know that we don’t have a license. If I had the license and I’m up to standard and I braid a client’s hair and she refuses to pay, then I can be comfortable and call the police in that case.”

She proposes lowering the hours and the cost of obtaining the license to make it more attainable. Kadi works seven days a week, and most of her employees come to work at the salon after their home care jobs. “If I had to leave my work and go to long classes, how am I going to work enough to pay all my bills such as rent etc.?” she says. “[Many] hair braiders are illiterate, how they are going to take class? This is a problem.”

*\*Interview conducted prior to the COVID-19 pandemic.*

**"People do not respect African hair braiders."**

**"I believe the license will help us. It's a good thing because we [would] get more respect."**

# POLICY RECOMMENDATIONS

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Braiders clearly stated that they want to become licensed so they can be respected in their work and practice hair braiding with dignity. ACT presents the following policy recommendations, which would significantly improve access to licensure and compliance with New York State licensing requirements.

## RECOMMENDATION 1

**Improve access to information about licensure. Ensure that braiders know the license exists, that they have in-person access to information about the licensing process, and that information is accessible to people with limited English proficiency and with limited literacy in their primary languages.**

Our research found that many braiders (42%) did not know the license existed, and more than a quarter (26%) knew the license existed but did not know how to get it. In addition, English language proficiency and lack of literacy posed major barriers for braiders navigating the licensure process. New York State should make information about the license readily available and accessible.

- **The Department of State should inform salon owners about natural hair braiding license requirements, and require that owners make this information known to braiders in their shops.** The Department of State should provide clear, multi-lingual explanatory materials to owners, and require that owners inform all braiders in their shops about license requirements.
- **The Department of State should designate a physical office space that braiders can visit, with staff who will walk through the licensure process with braiders, rather than just referring braiders to the state website.**
  - **This office should be staffed by people who speak the languages that African hair braiders speak,** including, at minimum, English, French, Mandingo and Wolof.
- **The State website about the Natural Hair Styling license should have multi-lingual written guidance and multi-lingual videos explaining the requirements of licensure and the process by which to pursue a license.** Written information and videos should be available in, at minimum, English, French Mandingo and Wolof. Providing information via video will be more accessible for license applicants with limited literacy than relying on written translation alone.



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## RECOMMENDATION 2

**Reduce and revise the course and examination requirements for licensure and require only health and safety curriculum for experienced braiders.**

The current requirement of 300 hours of coursework plus written and practical examinations poses significant time and cost barriers to braiders. It also exceeds training requirements for occupations that involve much greater health and safety risks than hair braiding, including security guards and home health aides. Unarmed security guards in New York are required to complete 24 hours of initial training, 16 hours of which are on the job (8 hour pre-assignment training and 16 hours of on-the-job training) plus an 8 hour annual in-service training course.<sup>17</sup> Armed security guards in New York are required to complete 71 hours of initial training, 16 hours of which are on the job (8 hour pre-assignment training; 16 hour on-the-job training; 47 hours of firearms training); plus 16 hours of annual training requirements.<sup>18</sup> Home health aides in New York are required to complete 75 hours of training, including 16 hours of on the job training.<sup>19</sup>

Therefore, the Department of State should lower the training requirements as follows:

- **For experienced braiders** (see below) **require only 20 hours of health and safety training.**
- **For those new to braiding, require 80 hours of study (inclusive of 20 hours of health and safety information).**
- **Eliminate the requirement for written and practical examinations,** instead requiring that a certificate of course completion is sent to the Department of State to obtain the license, as is the current practice for security guard licensing.

## RECOMMENDATION 3

**Streamline the process that requires experienced braiders to document prior experience.**

- **Experienced braiders should be required to furnish two letters of recommendation from prior clients** detailing location and approximate dates of service. **The requirements to provide a letter from a consulate and copies of passport or tax returns should be eliminated.**
- **The Department of State should make available template letters of recommendation, that include check boxes and blank fields for the requisite information** (such as the year in which services were received).

#### RECOMMENDATION 4

**Build the license application process into the course of study.**

- **Require that course providers furnish a certificate at the conclusion of the coursework, which can be sent to the state to receive a license.** Do not require any state boards or other written or practical examinations.
- **Require that course providers assist in filling out paperwork** for braiders with limited literacy or who need this support for other reasons.

#### RECOMMENDATION 5

**Dedicate resources and conduct concerted outreach to expand the roster of course providers.**

- **Public universities** should be encouraged to offer the course of study.
- **Experienced braiders** should be contracted to offer the course of study.
- **Nonprofit organizations** should be resourced to offer the course of study at low or no cost to braiders.

#### RECOMMENDATION 6

**Allow for use of the New York City Municipal ID card as the form of identification for the application process, and eliminate the requirement of a social security number or Federal ID number.**

The requirement that license applicants provide a written explanation for why they do not have a Social Security number should also be eliminated.

#### RECOMMENDATION 7

**Appoint natural hair stylists to the vacant seats on the Appearance Enhancement Advisory Committee, including at least one African hair braider.**

The Appearance Enhancement Advisory Committee, which advises the Secretary of State on rules, regulations and curriculum related to appearance enhancement, has two dedicated seats for natural hair stylists, but both seats had been vacant for extended periods at the time of this writing. This leaves African hair braiders without representation on the body that advises on the regulation of their industry. These seats should be filled immediately, and at least one seat should be filled by an African hair braider.



## RECOMMENDATION 8

**Convene a task force on theft of services, including hair braiders and representatives from the Department of State.**

The issue of theft of services, with customers refusing to pay after a braider has completed work, necessitates additional inquiry and solutions. A task force which includes African hair braiders could best identify the scope of the problem and avenues by which to address it.

## RECOMMENDATION 9

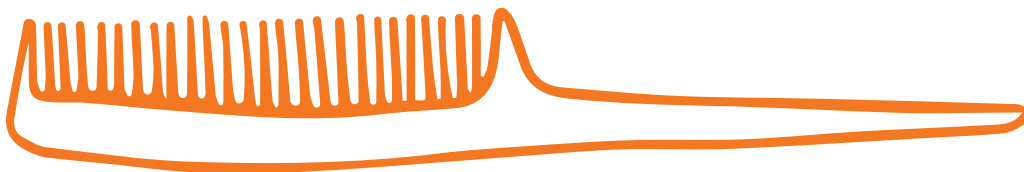
**Provide funding for targeted literacy programs to braiders with limited literacy.**

In recognition that many African braiders have limited literacy, both in English and in their primary languages, the Department of State should dedicate resources to create targeted literacy programs for hair braiders.





# BRAIDER PROFILE: RAMATOULAYE NGOM



Ramatoulaye Ngom is from Senegal and has lived in the U.S. since 2009.

She spoke about respect in the workplace and how it is connected to clients' refusal to pay for services and how hair braiders treat each other. "We always have problems like this. Sometimes they say they are going to the ATM to get cash and they never come back. Sometimes we try to negotiate with the client. We talk to the client to find out the problem beneath her refusal to pay. Is it price, the style, or does she want us to redo the hair? Most of them don't want us to redo the hair."

"The classes are too long and the fees are too expensive," Ramatoulaye says of the licensing process. She wants to see these barriers addressed, and support for braiders pursuing licensure. "They should help us get the license...with the license we can continue to [do] hair and we can even open our own business and go wherever we want. This is what we want."

**"They should help us get the license...with the license we can continue to [do] hair and we can even open our own business and go wherever we want. This is what we want."**

*\*Interview conducted prior to the COVID-19 pandemic.*

# BRAIDER PROFILE: MS



MS has been braiding hair for 20 years. Born and raised in the Ivory Coast, she learned to braid at a salon here in the U.S. and braiding has been her main source of income. “I braid hair to take care of my children and my parents back home. I love braiding hair, but it is not easy right now,” she shared.

Her income has been severely impacted since COVID-19 hit New York City, and although her bills are piling up, she is understandably worried about returning to the salon. “I am afraid, since the disease is still here. Even if the city opens back, the virus is still here, and some people can carry it without showing any symptoms...how do I know whether this client [has] the virus or not?” she wonders. Social distancing and mask requirements leave her worried about the logistics of long braiding sessions and how to keep herself safe, “I cannot be braiding hair for 4 hours straight while wearing a mask. I have so many thoughts in my head as to what to do... maybe I will have to wear a specific set of clothes that I only wear when I am braiding”. She also anticipates that customers will be nervous about reengaging in salon culture. “It will not be easy, all of us are afraid to contract the virus” she says.

“The process to get a hair braiding license is very difficult,” M says. “The requirements are extreme since the person has to go to school in English. I cannot read in English and many women braiders are in the same situation. In addition, I will not be able to pay for the classes. The requirement to have a social security number is also a problem since many hair braiders are undocumented.” M envisions a licensing process that does not require social security number, is lower cost, and that accommodates those who can’t read by showing videos instead of requiring classes. When asked how the City could show hair braiders that they are respected and valued, M suggested that “a city official do a televised meeting where they acknowledge the work the hair braiders do. They should congratulate and encourage the braiders in what they do and call on people to respect them. The meeting should be open to the general public so that those who get their hair braided can participate.” If she oversaw the hair braiding licensing process, M would not require Social Security numbers or classes and would instead show instructional videos.

**“I braid hair to take care of my children and my parents back home. I love braiding hair, but it is not easy right now”**

**“The process to get a hair braiding license is very difficult”**



# CALL TO ACTION

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While our research was conducted prior to the COVID-19 crisis, our findings and recommendations are crucial as New York City navigates the path to reopening and recovery.

African hair braiders want to access professional licensure but face numerous barriers in becoming licensed. In an industry that will be transformed in the wake of COVID-19, and in a city that must strive for economic recovery, reducing barriers and enabling braiders to achieve licensure is more important than ever.

African hair braiders can be important partners in community health education and COVID-19 prevention. But fears of interaction with inspectors may reduce compliance with safe reopening procedures, and increased inspections may put unlicensed braiders—already suffering economic losses from months of closure—at risk of penalties or shutdown.

New York has an opportunity to help African women working as hair braiders achieve dignity, security, and economic stability in their profession. We call on the Department of State to listen to the voices of braiders and to reform licensing now.





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# **LICENSING A LEGACY**

African Communities Together and Takeroot Justice 2020





**AFRICAN  
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**TAKEROOT  
JUSTICE**