SUBJ: DACOWITS RFI #9 - December QBM

FROM: Personnel Support Center – Personnel Servicing Division - Military Uniforms

(PSC-PSD-mu)

TO: DACOWITS Committee

THRU: Office of Diversity & Inclusion (CG-127)

EFFECT OF GROOMING STANDARDS ON WOMEN'S HEALTH

Military grooming standards ensure Service members are able to meet their occupational demands and maintain a professional appearance. However, sometimes these standards can unmask or exacerbate various skin conditions. According to the American Academy of Dermatology, *traction alopecia* is hair loss that is caused by repeat pulling of the hair due to tight hairstyles. Servicewomen can develop this condition if they wear their hair in a tight ponytail, bun, or braids, especially in combination with the use of chemicals or heat. Servicewomen have expressed to DACOWITS that specific standards are causing them non-reversible hair loss. The Committee is concerned about the potential unintended consequences and impact of grooming standards on women's long term health.

The Committee requests a <u>WRITTEN RESPONSE</u> from the Military Services to include Reserves OR Military Service Academies.

DACOWITS:

- a. Provide policies, regulations, and other directive sources that describe grooming standards for servicewomen. Include specifics that may be required for certain military specialties or working conditions, as well as any variances or allowances for racial or ethnic groups.
- b. Detail any reported or anecdotal information/data related to adverse health impacts of grooming standards, to include general standard or occupationally specific standards. Additionally, annotate which office collects such data and where is it reported.
- c. Describe any health impacts noted or reported which may be specific to different ethnic or racial groups (e.g., chemical hair treatments and/or hazardous products servicewomen may utilize to comply with grooming standards).
- d. Detail any studies that have been conducted related to health impacts on servicewomen associated with grooming standards.
- e. Detail any grooming standard waivers that are provided to Service members for diagnosed medical conditions.

CG Response:

a. The Coast Guard Uniform Regulations, COMDTINST M1020.6 (series) details standard grooming and uniform requirements and regulations for Coast Guard Active Duty/Reserve members. (See Enclosure (1)). Occupationally specific grooming requirements are not managed or governed by the Military Uniform Program; any specific grooming standards required by specialty, rating, or occupation would be detailed in corresponding program policy.

Through the Uniform Board process, recent fleet proposals lobbied to allow for modifications to current female grooming standards. The organization has approved and placed into draft policy (pending concurrent clearance and promulgation approval), allowances for increased hair bun size and width, braids/locks to be unpinned from the head so as not to fall below the collar or interfere with the wearing of formal headwear or PPE, pony tails to remain unfastened from the head so as not to fall below the collar or interfere with formal headwear or PPE, and expanded use of hair devices to secure hair in a neat and professional manner.

b. The Uniform Program was not directly aware of any adverse health impacts derived from current grooming standards until after reviewing 23 October 2018 Uniform Board proposals presented for policy change. It is a standard process for the Uniform Program to solicit input from the fleet ahead of charting the Uniform Board. During the board, the panel was presented with several informal studies conducted by female fleet personnel. These change proposals detailed specific concerns from members of various ethnicities regarding the difficulties they have in maintaining current standards based on hair type, texture, length and health. Furthermore, the discussion included language suggesting the level of effort and chemical products or devices needed to conform to current standards. It was determined by the board that without significant manipulation and/or use of potentially damaging hair products, some hair types/lengths will not be able to meet current standards without further damaging the member's hair or potentially causing hair loss. The board was also presented with information to suggest that the repeated pulling of the hair to form ponytails or pulled back hairstyles can lead to permanent hair loss and can cause headaches. Policy revisions (currently under review for promulgation) have been made to accommodate female grooming standards that reduce the need for repeated hair pulling and increased measurement standards for overall hair/bun length that reduces the need to use damaging hair products or devices.

c. Same as above.

- d. In the spring of 2018, the Uniform Program initiated a survey seeking information from the female workforce specific to uniform components and styles. The survey included an open comment section to discuss any grooming standards that the member may feel strongly about. The information gained was used to facilitate several recent changes to maternity uniforms, footwear choices and the above mentioned grooming changes. This information is maintained by the Uniform Program.
- e. There is no specific waiver request process within the Uniform Regulations. If a female member was to be diagnosed with a medical condition that may warrant a change from the current grooming standards, the member works with their medical provider and their commanding officer. As such in the Uniform Regulations, the Commanding Officer is responsible for enforcing the standards, however, they are also charged with allowing reasonable accommodations should it be necessary. Policy revisions (currently under review for promulgation) have been made to accommodate female grooming standards that reduce the need for repeated hair pulling and increased measurement standards for overall hair/bun length that reduces the need to use damaging hair products or devices.