

Prohibited Hairstyles at the Army's Chemical, Biological, Radiological, and Nuclear (CBRN) School White Paper



Figure 1: Photo Credit: <https://www.pinterest.ca/pin/449585975293666049/>

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Introduction

Army Regulation 670-1 and Department of the Army Pamphlet 670-1 were updated to authorize locked hairstyles in January 2017, thanks to Whennah Andrews' submission of DA 2028 along with an educational video about locks. The video can be found here: <https://youtu.be/XjM4ShZFd4g>

The Army's Chemical, Biological, Radiological, and Nuclear (CBRN) school at Fort Leonard Wood, however, continues to prohibit locks/dreadlocks and braids per their policy memorandum. In this white paper, we will explore several views about this current policy, facts about whether this policy is justified, and recommendations for a way ahead.



Figure 2: Photo of an Authorized Hairstyle, locks

Overview

What are locks (often called dreadlocks)?

Locks are tightly compressed ringlets or curls of hair that can be self maintained or maintained by a loctician.

The following July 2020 letter from the Senior Leaders Course and October 2020 letter from the Advanced Leaders Course prohibit locks and braids.

https://home.army.mil/wood/application/files/5715/9915/9437/CBRN_SLC_Welcome_Letter_COVID019.pdf?fbclid=IwAR3ohPztFPtANX9bX0xrriS6BILSNUfzStJkl5aFI2Whke_iL_W_ki0ZT4

https://home.army.mil/wood/application/files/6816/0389/2229/Welcome_Letter_v3.pdf?fbclid=IwAR1YafYmjaf0OVhstv6q9819E0Ut6Gh-8FdaDAN-plC9KQVMXO9aeFt7Ms

“Hair styles need to be clean and conducive to the proper wear and fit of the protective mask. Hair must be “free flowing,” in that all fibers of the hair must lay flat under the protective mask head harness. Hairstyles that prevent thorough washing of the scalp and hair (for example, tight braids) may not be worn into the hot area. Prohibited hair styles include, but may not be limited to braids, buns, beads, dreadlocks, corn rows and weaves.”

Chapter 1

Problem

Locks and braids are prohibited at the Army's CBRN School for the following reasons:

1. There is a pre-conceived notion that lock and braid wearers cannot properly fit and seal a protective mask.
2. There is a pre-conceived notion that locked and braided hair cannot be properly de-contaminated.
3. There is a pre-conceived notion to prohibit these styles due to safety reasons.
4. There is a belief that these prohibited hairstyles abide by Federal Guidelines.



Figure 3: When trainees place their protective mask on, their hair buns holders are removed and their hair is allowed to fall down towards the back. It is very challenging for un-styled and loose natural hair to fall down because natural hair grows up and out.

Chapter 2

Federal Guidelines

1. A Freedom of Information Act (FOIA) request was submitted to the Occupational Safety and Health Administration (OSHA) on 7 November with the following inquiry.

The case was assigned to an OSHA officer on 12 November with tracking number 2021-F-01553 and has an expected response date of 9 December 2020.

2. A FOIA request was submitted to the FBI on 7 November 2020 to request hairstyle policies during CBRN training. The case was assigned to a FBI officer on 17 November with tracking number 1480860-000.

3. An inquiry about hair policies during CBRN training was sent to the Environmental Protection Agency on 3 November 2020.

The FOIAs requested the following:

"Will you please share your agencies policies as it pertains to hair styles during Chemical, Biological, Radiological and Nuclear (CBRN) training?"

As of 16 November 2020, there is no confirmation as to whether national agencies prohibit locks and braids during CBRN training events.

Chapter 3

Can trainees with locks and braids properly maintain safety standards and seal their protective mask?



Figure 4: photo credits: <https://www.delawareonline.com>

Pictured above is a trainee (wearing the hairstyle called locks) at Delaware Technical Community College. He completed training, funded by the Environmental Protection Agency, for environmental remediation, water and wastewater treatment plant operations, hazardous materials and asbestos abatement.

According to a survey conducted in three military natural hair groups, women have stated that they can wear their protective mask while wearing locks/dreadlocks and braids.

Soldiers can test the fit and seal of their masks in advance of training at Fort Leonard Wood's Chemical Defense Training Facility (CDTF).

Chapter 4

Procedures on how to cleanse loose natural hair, locks and braids

A common misconception exists concerning the cleanliness of locked hair. Many believe this specific hairstyle is unclean and are ill-informed about hygiene procedures. Below is a brief step-by-step description of how locks can be cleaned:

1. The washing process should begin by lightly saturating locks with warm, running water.
2. A small amount of clarifying shampoo (ex. Suave Clarifying shampoo) should be placed in the palm of the hands.
3. The shampoo should be distributed onto the scalp and into the spaces between the roots of the locks.
4. The pads or tips of the fingers should massage the shampoo all over the scalp. The fingertips will provide a good scrub and cause enough friction to free the scalp of dirt and other impure particles.
5. Best practice dictates allowing the shampoo to sit for 1-2 minutes before rinsing with warm water. The head should be tilted downwards so the soapy lather runs through the locks. The shampoo lather should gently be squeezed into the locks. Rinse the locks with running water.

Step 1



Step 2



Steps 3 and 4



Step 5



Chapter 5

Basic Decontamination Procedures

The Center for Disease Control's guidance for basic decontamination of VX nerve agent states the following:

"For patients exposed to nerve agent vapor only, remove outer clothing and wash exposed areas including the head and hair with soap and water. For patients exposed to liquid agent, remove all clothing and wash entire body and hair with soap and water or 0.5% hypochlorite followed by a water rinse." source: <https://www.atsdr.cdc.gov/MHMI/mmg166.pdf>

Decontamination at the Army's CBRN School

Most recently, students received Gojo SkillCraft hand soap (NSN 8520-01-522-0839) to cleanse their hair. Decontamination of the body and hair with soap and water follows CDC guidance.

GOJOI`ã - SKILCRAFT Lotion Hand Soap - 12 oz Bottles, 12 per Box, NSN [8520-01-522-0839](https://www.dhs.gov/procurement/nsn)



Figure 5: GoJo Skillcraft soap

Chapter 6

Tests for Decontaminating Hair

Two tests show that hair cannot be fully (100%) decontaminated. The known tests for hair doesn't differentiate between straight, curly, wavy, locked or braided hairstyles, but the school only prohibits locks and braids. These prohibited hairstyles impact women of color who typically wear these hairstyles.

Per these studies, all hair types, not just locks and braids, are susceptible to off-gassing. It appears that everyone's hair would have to be removed after a chemical event. Hair removal for everyone appears to be a reasonable solution during a real world, life and death situation for safety reasons, but this is not reasonable for training.

Here is one National Institutes of Health study for decontaminating hair:

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6736418/>

Here is one French study about decontaminating hair.

<https://hal.archives-ouvertes.fr/hal-01792995/document>

Chapter 7

The Science of Hair

When hair is viewed under a microscope, it looks the same because hair is comprised of three parts: cuticle, cortex, and medulla. The only differentiation between hair type is the shape of everyone's follicle, which determines whether the hair comes out, wavy, curly or straight.

Scientifically, locks can be cleansed like any other hair type or hair style with cleansing agents.

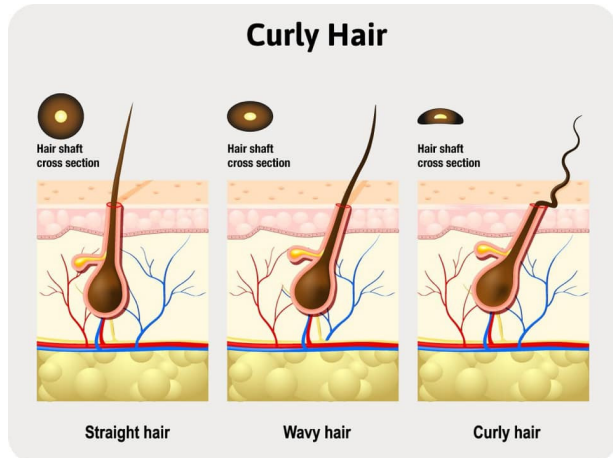


Figure 6: Photo Source: <https://www.ghemetbiologics.com/caring-for-4c-hair-a/272.htm>

Porosity

Curly Hair tends to have low porosity, which means that the cuticle layer is closed and requires heat for particles to enter. If locked and braided hair are prohibited, has there been any consideration to prohibit dyed hair, which has high porosity levels?

Chapter 8

Psychological Impact of Prohibiting Hairstyles without Valid Justification or Scientific Evidence

When a woman has to remove her locks to graduate from the 2-hour event at the CDTF facility at the Army's CBRN school, she would lose a minimum of a \$4,000 investment, 107 hours, about a month trying to comb them out, and part of her culture and identity due to a lack of understanding on how to properly clean her hair. Cutting off or combing out locks is a significant emotional event that could lead to post traumatic stress disorder.

Case Study 1: Based on a short survey, there are at least 10 Women of Color in the Army, 1 in the U.S. Marine Corps, and 1 woman in the U.S. Air Force who had to cut or comb out their locks to complete the 2-hour course at CDTF, Ft. Leonard Wood. The women who chose not to cut their locks, did not graduate and were reclassified to a new Military Occupational Skill (MOS).

Case Study 2: One Army woman cut off her locks one day before training, conducted the 2-hour training event at CDTF, Fort Leonard Wood and went to the salon the day after training to have her locks re-attached by a professional loctician.

Case Study 3: A woman announced her enlistment as a 74D to a group of woman on social media in November 2020. She exclaimed her excitement to join the Army. After these women noticed her locks, they informed her that she could not graduate from the Army's CBRN school with locks. This young enlistee (about 18 years old) immediately contacted her recruiter and requested to re-negotiate her contract.

Recommendations

School Recommendations (Survey Responses)

1. Determine whether there are more effective ways to decontaminate hair.
2. Explore whether a hypochlorite shampoo (outlined in CDC's basic decontamination guidance) can decontaminate hair more effectively than Gojo SkillCraft hand soap, provided to trainees.
3. Explore whether trainees could wear a hooded mask, which was used in the past (suggested by a veteran NBC NCO).
4. Explore whether all trainees could cover their hair with a swim cap (see figure 7 for swim cap large enough to cover braids and locks) during the 2-hour training event (suggested by a woman veteran NBC NCO) as hair can't be decontaminated 100%.
5. Ensure that the Army's CBRN School conducts a legal review since locks and braids are authorized hairstyles, as of January 2017.
6. Conduct laboratory tests to compare the decontamination levels for straight, curly, wavy, locked, and braided hair.
7. Conduct protective mask fit test to determine seal effectiveness between women with straight, curly, wavy, locked, and braided hair.
8. Conduct a meeting with decision makers, chemical subject matter experts, medical doctors, cosmetologists, locticians (recommendation to invite Dr. JoAnne Cornwell, CEO and founder of sisterlocks) and women who wear locks and braids to come up with a solution that will allow women to safely complete training at the CDTF facility and keep their locks/braids in order to maintain morale.

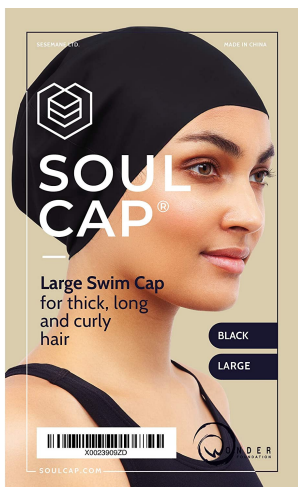


Figure 7: Photo Source:
https://www.amazon.com/dp/B07PH48J6K/ref=cm_sw_em_r_mt_dp_aSHSFb3PW446D?_encoding=UTF8&psc=1

Recommendations

Individual Recommendations (Survey Responses)

1. Contact your Chain of Command first.
2. Contact the Inspector General.
3. Address this topic with The Defense Advisory Committee on Women in the Services (DACOWITS) at their 8 and 9 December 2020 meeting. Comments are due by 30 November.
<https://www.federalregister.gov/documents/2020/10/28/2020-23877/defense-advisory-committee-on-women-in-the-services-notice-of-federal-advisory-committee-meeting>
4. Reach out to the National Association of Social Workers (NASW) Code of Ethics network.
5. Seek help from lawmakers who co-sponsored the Crown Act of 2020. (Create a Respectful and Open Workplace for Natural Hair).
Congress: <https://www.congress.gov/bill/116th-congress/house-bill/5309>
Senate: : <https://www.congress.gov/bill/116th-congress/senate-bill/3167>
6. Contact the TRADOC DCG on Twitter

Conclusion

Safety is the number one concern for all training events. Safety for training should not involve extreme measures that prohibit hairstyles and impact just one population within the military.

Although prohibited hairstyles impact a small population of women, these women matter.