

January 10, 2022

Senator Bobby Joe Champion  
Minnesota Senate  
3401 Minnesota Senate Bldg.  
St. Paul, MN 55155

Dear Senator Champion,

Thank you for the opportunity to comment on Senate File 44, legislation to add a definition of race inclusive of natural hair texture and hair styles to the Minnesota Human Rights Act. I understand there has been some discussion and concern that prohibiting discrimination in employment based on race to include natural hair styles and textures could create health or safety risks in the workplace. I am unaware of any evidence that natural hair styles create any greater health or safety risks in the workplace than other hair styles. Employers can, are, and will continue equitably addressing workplace hazards associated with long or loose hair through appropriate policies, training, and personal protective equipment.

Further, the proposed legislation creates no conflict with Minnesota Occupational Safety and Health (MNOSHA) regulations. MNOSHA is a federally approved state OSHA plan. MNOSHA has adopted Minnesota Rule 5205.0020 that requires employers to ensure workers are protected by having their hair contained or secured where there is danger of scalp injury and there is concern that the worker's hair would become entangled in moving machinery parts. Employers are responsible for identifying and addressing workplace hazards and ensuring health and safety policies are applied to all employees.

In summary, the CROWN Act furthers equity and inclusivity in the workplace and presents no conflicts with existing safety and health laws or regulations. Any apparent workplace health or safety concern related to loose or long hair, regardless of texture or style, can be addressed and mitigated in an equitable manner. Indeed, clarifying that prohibitions on race discrimination include hair texture and style benefits our society and economy as a whole while we address race-based discrimination, conscious and unconscious bias and strive for equality.

Sincerely,



James Krueger  
Director  
MNOSHA Compliance