

A RESEARCH & POLICY PRIMER

**Dress and Grooming
Codes in Public Schools**

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The [Center for Racial and Economic Justice](#) (CREJ) works to advance equity and justice through legal education, original research and scholarship, and academic-community partnerships and collaborations. Each year, CREJ convenes and facilitates dialogues with scholars, practitioners, and community leaders through conferences, symposia, and roundtables on contemporary field issues and challenges in racial and economic injustice. To achieve its mission, CREJ actively collaborates with UC Law San Francisco faculty, UC Law San Francisco students, and local and national organizations, as well as other race and law centers across the country.

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The [Education Law Center-PA](#) (ELC) is a nonprofit, legal advocacy organization with offices in Philadelphia and Pittsburgh, dedicated to ensuring that all children in Pennsylvania have access to a quality public education. Through legal representation, impact litigation, community engagement, and policy advocacy, ELC advances the rights of underserved children, including children living in poverty, children of color, children in the foster care and juvenile justice systems, children with disabilities, multilingual learners, LGBTQ students, and children experiencing homelessness.

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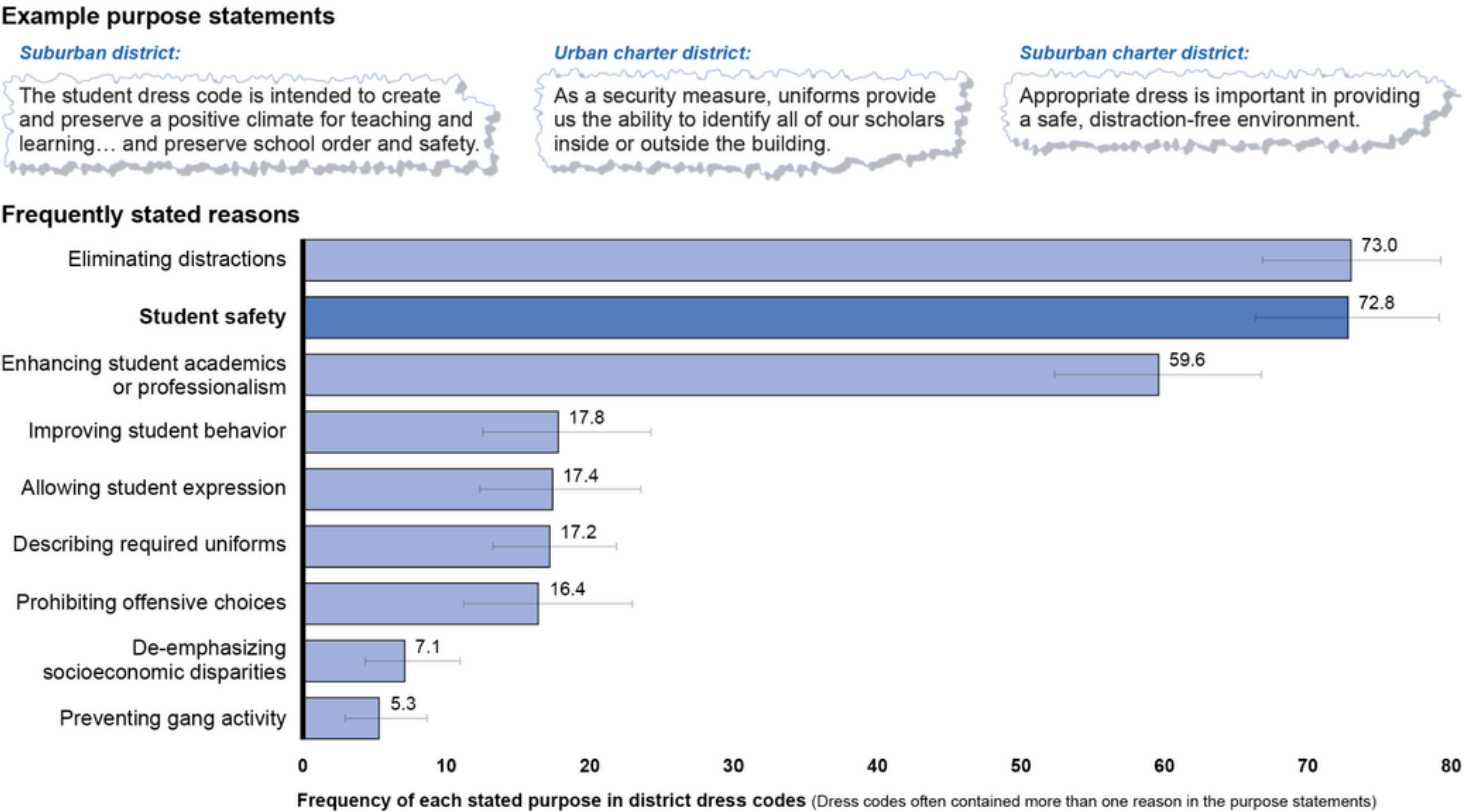
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What rules govern students' dress and grooming in public Kindergarten-12 schools?

School climates¹ are profoundly shaped by the rules that schools create and enforce.² Research shows that when schools promote accessible, equitable, and positive school climates through policies and practices, students experience higher academic outcomes, graduation rates, and overall health and wellbeing³. The inverse has also been found.⁴ For many students, restrictive and exclusionary dress and grooming rules make the school environment less equitable and safe for students.”⁵

Across the country kindergarten-12 (K-12) public schools seek to regulate students' physical bodies, expressions, and behavior through the use of dress and grooming rules and policies.⁶ Such rules and policies are developed and implemented under the legal authority of state and local provisions. For example, an analysis by the Education Commission of the States found that "24 states and the District of Columbia explicitly grant local districts the power to establish dress codes.”⁷

Figure 9: Estimated Percentage of School Districts Citing a Particular Purpose for Their Dress Code, among the Estimated 92 Percent of Districts That Stated a Purpose



Source: GAO review of dress codes. | GAO-23-105348

Dress and grooming rules are a nearly universal feature of public school districts — “93 percent [of schools] have a policy on how students dress.”⁸ Self-reported data collected by the United States Department of Education’s School Survey on Crime and Safety” published by the United States Governmental Accountability Office found that “nearly half of schools nationwide reported that they enforce a strict dress code,” with “nearly one in five” school districts prescribing that students wear uniforms to school.⁹

Like other forms of public school rules, dress and grooming provisions must be in writing, published, and comply with federal, state, and local level law.¹⁰ For example, rules must not be unconstitutionally vague, so that students have adequate notice about what behaviors may be in violation of a school’s stated rules.¹¹ Further, they may not directly violate Title IX of the Education Amendments of 1972, which prohibits sex-based discrimination, including through the enforcement of sex-stereotyped dress and grooming requirements.¹²

Dress and grooming code rules are often included in broader school policy documents called “Codes of Conduct” or “Student and Family Handbooks.”¹³ For example, in Pennsylvania, the School District of Philadelphia and Pittsburgh Public Schools, the Commonwealth’s two largest school districts, nest their student dress codes in their respective Codes of Conduct.¹⁴ Under these rules, school boards and school administrators may govern students’ physical presentation while at school in a range of ways, including but not limited to requiring a specific uniform attire to restrictions on what defines “appropriate”¹⁵ grooming to attend school.¹⁶ However, schools may not impose rules that illegally discriminate against students at school.¹⁷ The current legal landscape is largely permissive, allowing public schools to create rules for students that regulate both their physical presentation and behavior at school along the contours of established legal boundaries.¹⁸

What does research tell us about the state of dress and grooming rules in public schools in the United States?

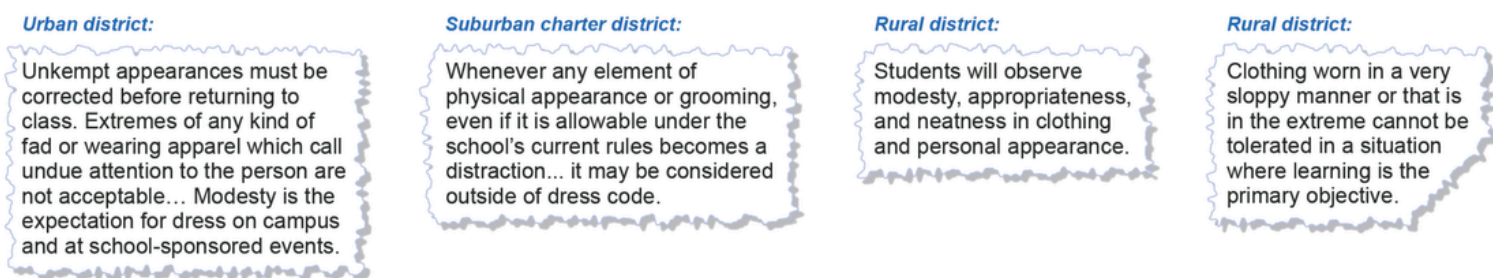
Despite constitutional and state-level prohibitions against vagueness, “almost all districts dress code policies (an estimated 93 percent) contain rules with subjective language that leave decisions about dress code compliance open to interpretation,”¹⁹ many of which rely upon terms used to police and devalue bodies presumed to be “female,” such as prohibitions on “immodest” or “revealing clothing.”²⁰

Analysis by the United States Government Accountability Office (U.S. GAO) found that more than half of dress and grooming rules address students' hair, hairstyles, and hair coverings.²¹ At their essence, dress and grooming codes are adopted to control the expression and image of students in a learning environment. However, most often this reality is concealed and policies are promulgated for the purposes of “appropriateness,” or limiting “distractions,” or similar rationales.²² School leaders may also put forth justifications that “schools use dress codes to address safety and security,”²³ with an “estimated 73 percent of dress codes citing this as a goal for the design of their dress codes.”²⁴

Dress and grooming rules, since their inception, have sought to enforce white Eurocentric standards of bodies, beauty, and behaviors through formal exclusionary and segregatory policies and practices.²⁵ For example, they were used to enforce cultural genocide of Indigenous first peoples in boarding schools²⁶, control Black bodies and identities during American slavery²⁷, and further racist projects to eliminate and erase the existence of bodies and identities in efforts to enforce whiteness,²⁸ and cultural erasure more generally as part of white supremacist projects.²⁹

The impact of these rules is evident in what they require. Dress codes may be so restrictive as to require students to wear a proscribed daily uniform,³⁰ require specific clothing during specific educational settings (e.g., physical education³¹), prohibit certain clothing lengths or shapes, or regulate what is displayed on clothing.³² Grooming codes likewise may impose requirements on hair color, hairstyle (e.g., all hair must be “natural”), or vague requirements like “neat.”³³ For example, one grooming code states “[h]air must be neat and clean. Unconventional hairstyles that distract from teaching and learning will be prohibited.”³⁴ In doing so, leaving key terms such as “neat,” “clean,” and “unconventional” open to interpretation, subjectivity, and discriminatory enforcement, which may not pass legal muster if they were to be challenged.

Figure 6: Dress Code Excerpts: Examples of Rules with Subjective Language



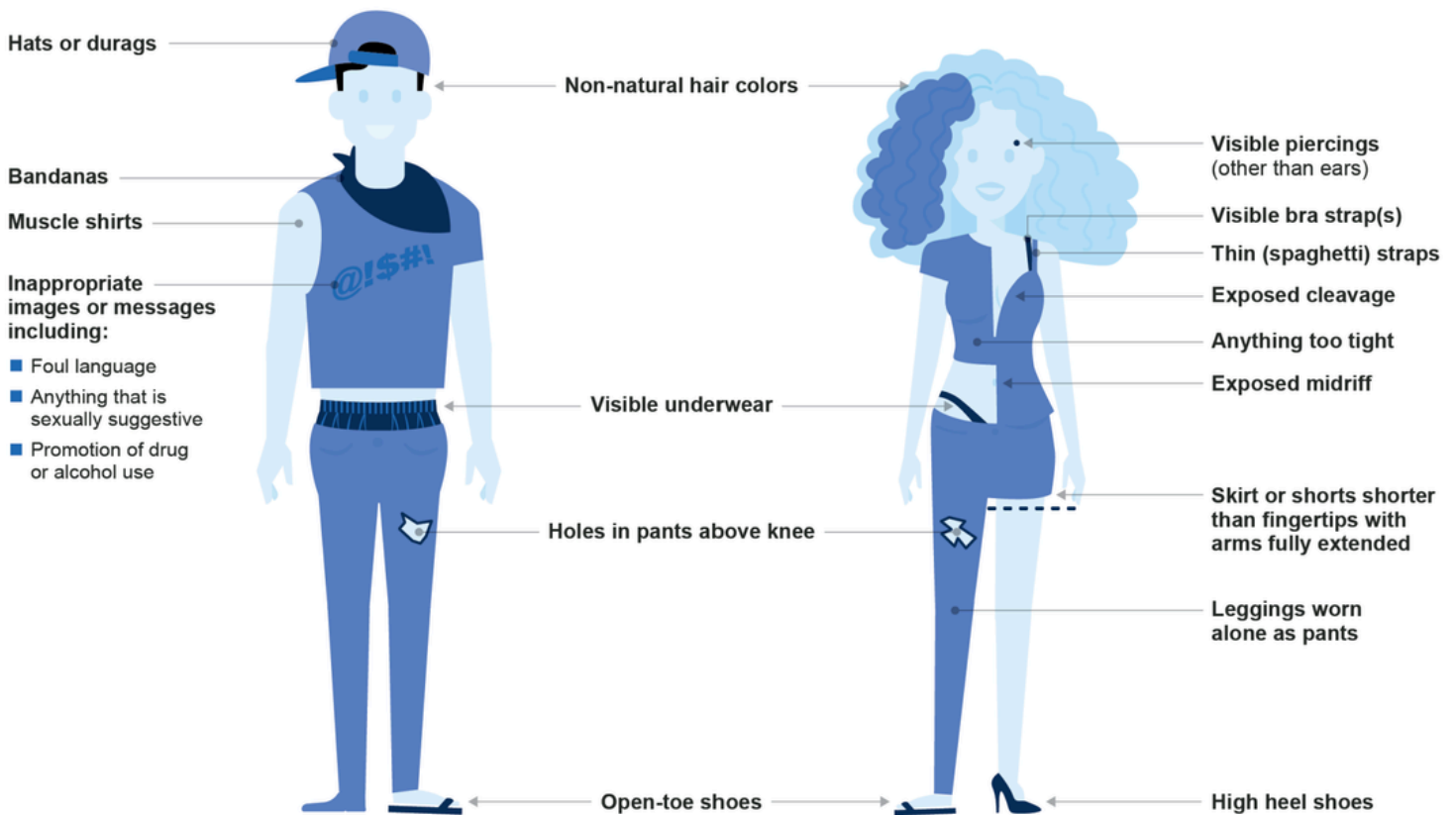
Source: GAO review of dress codes. | GAO-23-105348

Such rule schemas create specific metrics of surveillance that are disproportionately experienced by female-identified students. For example, “90 percent of dress codes prohibit clothing items typically associated with girls,”³⁵ and many identify specific grooming and dress rules by a binary “girls” and “boys” dress code sections.³⁶ Such intersectional discrimination, and its particular enforcement against Black girls, has been documented by civil rights and education advocacy organizations, including the National Women’s Law Center³⁷ and ELCA-PA.³⁸ In a study of dress code policies across Washington, D.C., public high schools it was reported that Schools were “20.8 times more likely” to choose to suspend Black girls than their white peers.³⁹ Such findings are consistent with research on the impact of adultification bias, a form of racial and sex-based discrimination that occurs when adults view Black girls as less innocent and more adult-like than their white peers, a perception that can lead to harsher scrutiny and discipline.⁴⁰ Black boys also face intersectional discrimination under dress and grooming rules, most often in the regulation of hair style and length-based restrictions.

Figure 1: Examples of Items Prohibited by School Dress Code Policies

Example of K-12 School Dress Code

Prohibited items may not be worn on campus or at school-sponsored activities



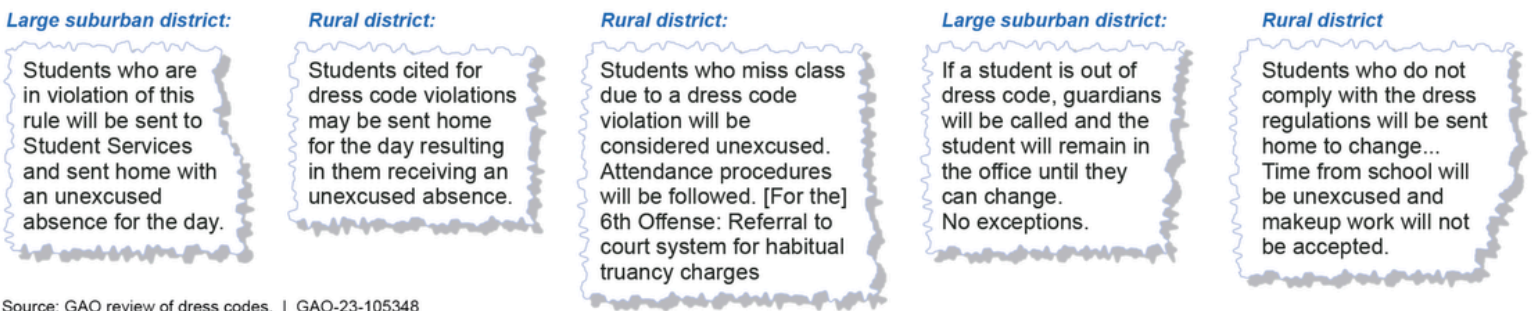
Source: GAO summary of publicly-available dress codes; stock.adobe.com (base artwork). | GAO-23-105348

How do the creation and enforcement of dress and grooming rules contribute to student pushout?

Dress and grooming codes are enforced through a broad range of stigmatizing and exclusionary disciplinary mechanisms, including requiring students to change clothes⁴¹, issuing verbal warnings⁴², rendering students ineligible to participate in any extracurricular activities⁴³ and removing students from their learning environment through in-school suspensions⁴⁴ out-of-school suspensions⁴⁵ and, in some cases, expulsion,⁴⁶ which in some jurisdictions may be permanent and be unrestricted by age.⁴⁷ In addition to formal disciplinary sanctions, school officials employ “send home” practices, whereby students are removed from school and sent home for alleged dress or grooming code violations without a formal suspension.⁴⁸ Research has documented how these forms of “informal” discipline practices produce many of the same adverse educational consequences associated with formal discipline⁴⁹ while artificially reducing overall suspension rates and erasing the tangible ways students are deprived of learning opportunities.⁵⁰ Given that Black and Brown students, students identifying as female, LGBTQ+ students, and students living at the intersection of these identities are disproportionately targeted by these policies and officials charged with enforcing them who choose to remove them from the classroom, and deprived of an opportunity to learn.⁵¹

The United States Government Accountability Office study found that 44 percent of school dress codes included informal exclusion practices, such as removing students from class or sending them home without due process, without recording the removal as formal discipline.⁵² The report also found that schools with strict dress codes were associated with higher rates of disciplinary practices that exclude students from the classroom.⁵³

Figure 13: Dress Code Excerpts: Examples of Removing Students from Class



Source: GAO review of dress codes. | GAO-23-105348

Whether enforced formally or informally, the use of exclusion and/or segregation of students from their learning communities through dress and grooming codes can produce immediate and long-term harms ranging from inequitably limiting children's access to core curriculum and essential instructional time to undermining opportunities for children to engage in critical extracurricular opportunities to inhibiting positive social-emotional development, school connectedness, and positive peer relationships.⁵⁴

Further, it has been found that the enforcement of dress and grooming rules stigmatizes students, which, in turn, contributes to negative self-perceptions about their own expression and identities.⁵⁵ Research has identified, for example, how Black girls experience such stigmatization as feelings of having to shrink or conform to avoid facing reprisal, exclusion, and/or discipline from adults in their schools.⁵⁶ Similarly, Latiné students who were disciplined for wearing clothing associated with vague and subjective and clearly racialized terms such as “gang-related” attire, such as wearing a certain color of garments including “blue and red bandannas, shoelaces, belts, and earrings,”⁵⁷ “hoop earrings,”⁵⁸ often described feeling criminalized, alienated from school, and less motivated to participate in their education.⁵⁹ Additionally, sex stereotyping and gender stereotyping of young female students produced evidence-based perceptions of being more targeted for punishment and exclusion in comparison to male-identified peers.⁶⁰

Policing Black Girlhood

In 2023, the Black Girls Education Justice Initiative of the ELCA-PA released “[We Need Supportive Spaces That Celebrate Us: Black Girls Speak Out About Public Schools](#)” to centering the lived expertise of students with lived experience with Black girlhood to highlight how preventable “inequities caused by anti-Black racism, sexism, ableism, homophobia, transphobia, and economic injustice pervade every aspect of Black girls’ education” and sets forth key demands needed for change.⁶¹ Key findings include:

- Students described dress and grooming codes being enforced “by adults policing the ways their bodies look” in ways that led to sexualization, shame, and exclusion.⁶²
- They reported being disciplined based on their body shape, being sent home even while wearing the required uniform, and being singled out when white peers who followed the same rules were not, and witnessing other Black girls being subject to disparate and subjective enforcement.⁶³
- Demanded immediate reforms that affirmatively safeguard students' rights against racial discrimination, such as the Pennsylvania C.R.O.W.N. Act, which took effect on January 24, 2026.⁶⁴

What strategies can be used to transform dress and grooming codes into rules that affirmatively grant students rights or protections?

To promote safe, positive, and healthy school climates and remove unnecessary barriers to learning states, localities, and schools should focus their attention on the passage of C.R.O.W.N. Acts and the development of new dress and grooming rules that affirm students' identities, expression, and dignity.

Strategy 1: C.R.O.W.N. Acts and anti-discrimination laws

To address the prevalence of racialized hair discrimination in the United States, including in schools, some state legislatures have enacted C.R.O.W.N. Acts (Creating a Respectful and Open World for Natural Hair).⁶⁵ The first C.R.O.W.N. Act was enacted in 2019 in California, and as of December 2025, thirty states have passed the CROWN Act or legislation inspired by it.⁶⁶

Presently, C.R.O.W.N. Act protections have been codified at the state, municipal, and local levels⁶⁷ with differences in scope.⁶⁸ While protections differ by jurisdiction, these legal frameworks offer promise to provide needed protections for protective styles such as braids, locs, twists, cornrows, tight coils or curls, Bantu knots, afros, weaves, and wigs, and for adornments and coverings including headwraps, cultural headdresses, extensions, hair color, and hair adorned with ornaments such as ribbons, beads, or barrettes.⁶⁹ Moreover, some of these laws explicitly include “including but not limited to” language around what forms of racial hair discrimination around protective hairstyles are prohibited.⁷⁰ This language, clarifying that the list of protective hairstyles is not exhaustive, allows other displays of expression to be protected by C.R.O.W.N. Acts that include it.⁷¹

C.R.O.W.N. Acts often amend a state's anti-discrimination law to specify that prohibitions on racial discrimination include discrimination based on hair. For example, New Jersey's C.R.O.W.N. act amended the New Jersey Law Against Discrimination, so that students cannot be penalized for hair texture, hair type, or protective hairstyles.⁷² Some C.R.O.W.N. Acts, such as the 2022 Massachusetts Act, protect against fewer types of hair discrimination. Massachusetts forbids academic organizations from adopting policies that restrict natural or protective hairstyles.⁷³

Entities with the applicable legal authority, such as schoolboards, must review rules and revise in their policies to avoid conflict with non-discrimination laws, e.g., C.R.O.W.N. Acts. Examples of rules include bans on specific hair styles, head coverings, and hair textures.

Harnessing the Power of C.R.O.W.N. Acts: Pennsylvania as a Case Study

In 2025 Pennsylvania adopted and codified C.R.O.W.N. Act protections that impact “places of public accommodations,” which includes public schools, charter schools and cyber charter schools, and preschools⁷⁴ and amended the Pennsylvania Human Relations Act (“PHRA”),⁷⁵ clarifying that “race” includes traits historically associated with race, explicitly including hair texture and protective hair styles. Interpreted broadly, the C.R.O.W.N. Act limits schools from “creating school policies restricting how students can wear or treat their hair,” which is an “example of hair discrimination.”⁷⁶

The law defines “protective hairstyle” to “include, but not be limited to, such hairstyles as locs, braids, twists, coils, Bantu knots, afros and extensions”⁷⁷ and protects students from punishment or discipline “for expressing their racial and cultural identity,” including their “hair texture or for wearing a protective hairstyle or head covering, including during athletic events.”⁷⁸

The law also defines “religious creed” to include “head coverings and hair styles historically associated with religious creeds.”⁷⁹ Examples of protected expression which would include niqabs, headscarves, hijabs, kippahs, and yarmulkes.⁸⁰

Since its passage, the C.R.O.W.N. Act has provided advocates, parents, and caregivers a legal foundation to challenge dress and grooming rules such as bans on hairstyles predominantly worn by Black students, e.g., combs, headscarves, durags, and wave caps.⁸¹ However, advocates have identified that the protective and affirming impact of the C.R.O.W.N. Act are not limited to invalidating facially racially discriminatory rules.⁸²

Strategy 2: Affirming and protective dress and grooming rule provisions

Schools across the country have begun to develop “protective” dress and grooming code provisions, which is an action every district could undertake.⁸³ Two examples of these “protective” provisions include explicitly naming discriminatory conduct and making clear that discrimination is illegal, and including specific language outlining protections around a student’s identity and expression.

A preliminary sampling by the Center for Racial and Economic Justice of more than thirty public school districts⁸⁴ school codes of conduct, or equivalent policy documents identified 16 “protective” provisions.

Approach 1: Name and Explicitly Prohibit Illegal Discrimination in Dress and Grooming Rules

Dress and grooming codes should make clear to name and identify practices that may constitute illegal discrimination. For example, Polk County Public Schools, “. . . Students shall not be excluded from participating in any educational program or activity provided in the public school of Polk County based on race, color, national origin, sex (including sexual orientation, transgender status or gender identity), religion or disability (including HIV, AIDS or sickle cell trait), pregnancy, marital status, age (except as authorized by law), military status, ancestry or genetic information, which are classes protected by State and/or Federal Law (collectively, “protected classes”).⁸⁵ New York City Public Schools prohibits hair discrimination directly, providing, “dress codes must not prohibit a student from wearing clothing consistent with their needs based on their protected identities or from maintaining or wearing natural hair or hairstyles that are closely associated with these identities. For example, dress codes should allow. . . head scarves, do-rags, beads and other hair accessories, short or long hair, locs, braids, and twists.”⁸⁶ Seattle Public Schools prohibits discrimination for one’s body shape/size and type, “Dress code enforcement” will not create disparities, reinforce or increase marginalization of any group, nor will it be more strictly enforced against students because of. . . body size/type, or body maturity. . .”⁸⁷

Approach 2: Include Explicit Identity and Expression Affirming Protections in Dress and Grooming Rules

Dress codes should be revised to affirm students' identities, protect cultural, religious, and gender expression, prescribe positive staff responses to violations, focus on equity and dignity, and prioritize keeping students engaged in their learning environment.⁸⁸ For example, the School District of Philadelphia recognizes students' right to "dress consistent with their racial, cultural, religious, and gender identities."⁸⁹ Portland Public School District focuses on keeping students in the classroom, stating that attire should never be "grounds for exclusion from class or activities."⁹⁰ Seattle Public Schools explicitly prohibit unnecessary discipline and body shaming for students' body shape and size, hair, and dress.⁹¹ Allentown School District uses gender neutral language that applies to all students: "Students must wear clothing including both a shirt and pants or skirt, or the equivalent."⁹² Fairfax County Public Schools maintain students' dignity by stating, "Discussions about dress code violations shall be held privately and maintain the dignity of the student."⁹³ The school district of Palm Beach County, Florida's policy maintains that no student will be denied attendance at school for failing to comply with the dress code and provides clothing assistance to students experiencing financial hardship.⁹⁴

Endnotes

¹ Stephen Kostyo, Jessica Cardichon & Linda Darling-Hammond, Learning Policy Inst., Making ESSA's Equity Promise Real: State Strategies to Close the Opportunity Gap — Building a Positive School Climate (2018),

<https://learningpolicyinstitute.org/product/essa-equity-promise-climate-brief> (defining a positive school climate as one reflecting a school's "norms, goals, values, interpersonal relationships, teaching and learning practices, and organizational structures" (quoting Nat'l Sch. Climate Ctr., What Is School Climate?)).

² U.S. Dep't of Educ., Guiding Principles: A Resource Guide for Improving School Climate and Discipline 4–6 (2014), <https://www.ed.gov/sites/ed/files/policy/gen/guid/school-discipline/guiding-principles.pdf>.

³ Learning Policy Inst., Using Data to Improve School Climate (fact sheet), https://learningpolicyinstitute.org/media/4488/download?inline&file=Data_School_Climate_FACTSHEET.pdf ("Positive school climates are associated with increased academic achievement and attendance, higher graduation rates, improved behavior, and lower teacher attrition rates."); see also Impact of School Climate, Youth.gov, <https://youth.gov/youth-topics/school-climate/impact-of-school-climate> (collecting studies linking positive school climate to higher achievement, high school completion, college readiness, and improved mental and behavioral health); Steven H. Woolf et al., Education: It Matters More to Health than Ever Before, Va. Commonwealth Univ. Ctr. on Soc'y & Health, <https://societyhealth.vcu.edu/work/the-projects/education-it-matters-more-to-health-than-ever-before.html>.

⁴ Darren Kwong & Jonathan Ryan Davis, School Climate for Academic Success: A Multilevel Analysis of School Climate and Student Outcomes, 25 J. Rsch. in Educ. 68 (2015), <https://files.eric.ed.gov/fulltext/EJ1098022.pdf> (finding higher levels of institutional surveillance negatively affected students' perceptions of safety and their academic success); Thalia González, Exclusionary School Discipline and Student Health and Wellbeing: A Research Spotlight Brief, Ctr. on Racial & Econ. Justice, UC Law SF (2025), <https://www.uclawsf.edu/wp-content/uploads/2025/07/ESD-and-Health-Research-Brief.pdf>; School Environment, Youth.gov, <https://youth.gov/youth-topics/school-environment> (interactions framed by a school's culture and structure affect student and school outcomes).

⁵ U.S. Gov't Accountability Off., GAO-23-105348, K-12 Education: Department of Education Should Provide Information on Equity and Safety in School Dress Codes Highlights (2022), <https://www.gao.gov/assets/gao-23-105348.pdf>.

⁶ GAO-23-105348, supra note 5, at 1, 11.

⁷ U.S. Gov't Accountability Off., GAO-23-105348, supra note 5, at 3 (citing Educ. Comm'n of the States).

⁸ GAO-23-105348, supra note 5, at 9.

⁹ GAO-23-105348, supra note 5, at 6.

¹⁰ See *Grayned v. City of Rockford*, 408 U.S. 104, 108–09 (1972) (holding that a law is void for vagueness where it fails to "give the person of ordinary intelligence a reasonable opportunity to know what is prohibited, so that he may act accordingly"); see also *Hamilton v. Unionville-Chadds Ford Sch. Dist.*, 714 A.2d 1012, 1014 (Pa. 1998) (holding individual schools may promulgate disciplinary rules so long as they are published and consistent with board policy); *Killion v. Franklin Reg'l Sch. Dist.*, 136 F. Supp. 2d 446, 459 (W.D. Pa. 2001); cf. *Peltier v. Charter Day Sch., Inc.*, 37 F.4th 104, 125–26 (4th Cir. 2022) (en banc) (holding a public charter school's requirement that female students wear a "skirt," "jumper," or "skort" violated the Equal Protection Clause as unlawful sex discrimination).

¹¹ See 22 Pa. Code § 12.11(a) (2005) (authorizing a school's governing board to establish dress codes or require uniforms, applicable to individual buildings or all buildings in the district); see also 42 U.S.C. § 2000d (Title VI of the Civil Rights Act of 1964); 20 U.S.C. § 1681 (Title IX of the Education Amendments of 1972); 43 P.S. Ch. 17 (Pennsylvania Human Relations Act); 16 Pa. Code § 41.204 (2023) (defining "traits associated with race" to include, but not be limited to, "hair texture and protective hairstyles, such as braids, locks [sic], and twists").

¹² See Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681(a); see also ELC-PA, How to Create Equitable Codes of Conduct (2025), <https://www.elc-pa.org/wp-content/uploads/2025/08/How-to-Create-Equitable-Codes-of-Conduct-Factsheet-Format.pdf>; Leadership Conf. Educ. Fund et al., Nondiscrimination in Dress and Grooming Codes (July 2025), <https://www.idra.org/wp-content/uploads/2025/08/Nondiscrimination-in-Dress-and-Grooming-Codes-Final.pdf>.

¹³ GAO-23-105348, supra note 5, at 4 ("Dress codes may be embedded in larger discipline documents or student codes of conduct.").

¹⁴ Sch. Dist. of Phila., Code of Conduct 9 (2024–2025); Pittsburgh Pub. Schs., Code of Student Conduct 21 (2025), https://resources.finalsite.net/images/v1765299498/pghschoolsorg/ic8ab40gzk57hj8do22r/PPS-2025-Code_of_Conduct.pdf.

¹⁵ GAO-23-105348, supra note 5, at 4.

¹⁶ See 22 Pa. Code § 12.11(a) (2005) (authorizing a school's governing board to establish dress codes or require uniforms, applicable to individual buildings or all buildings in the district).

¹⁷ See infra notes 68–73 and accompanying text (discussing C.R.O.W.N. Acts).

¹⁸ GAO-23-105348, supra note 5, Highlights.

¹⁹ GAO-23-105348, supra note 5, at 13.

²⁰ GAO-23-105348, supra note 5, at 13.

²¹ GAO-23-105348, supra note 5, at 14 ("most dress codes (an estimated 59 percent) contain rules about students' hair, hairstyles, and hair coverings").

²² GAO-23-105348, supra note 5, at 15.

²³ GAO-23-105348, supra note 5, at 15.

²⁴ GAO-23-105348, supra note 5, at 15.

²⁵ NAACP Legal Def. Fund, Black Hair Belongs Everywhere (July 12, 2023), <https://www.naacpldf.org/wp-content/uploads/2023-07-12-Black-Hair-Belongs-larger-5-1.pdf>; Manka Nkimbeng et al., The Person Beneath the Hair: Hair Discrimination, Health, and Well-Being (2023), <https://pmc.ncbi.nlm.nih.gov/articles/PMC10457631/>; see also ELC-PA, CROWN Act Prohibits Racial Hair Discrimination (Feb. 2026), <https://www.elc-pa.org/wp-content/uploads/2026/01/ELCPA-CROWN-Act-Fact-sheet.pdf>.

²⁶ Nat'l Native Am. Boarding Sch. Healing Coal., Healing Voices, Volume 1: A Primer on American Indian and Alaska Native Boarding Schools in the U.S. (2020), <https://boardingschoolhealing.org/wp-content/uploads/2024/08/NABS-Newsletter-2020-7-1-spreads-min.pdf>; Letter from Native Am. Rights Fund to Robert P. Spencer, Chairman, & Bd. of Trs., Classical Charter Schs. of Leland (Apr. 26, 2023), <https://www.narf.org/nill/documents/202340426narf-letter-ccsl-hair-policy.pdf>.

²⁷ Manka Nkimbeng et al., supra note 25; see also Haley Cole, Note, Loc(k)ed Out: The Legal Imperative for a Federal CROWN Act & Redefined Immutability, 66 B.C. L. Rev. 2365 (2025), <https://bclawreview.bc.edu/articles/10.70167/AXUU5496>.

²⁸ Chasity Henry, Knot Today: A Look at Hair Discrimination in the Workplace and Schools, 46 Thurgood Marshall L. Rev. 1, 30 (2021), https://www.tsulaw.edu/law_review/29%20Revised%20Thurgood%20Marshall%20Law%20Review%2046-1%20Fall%202021.pdf.

²⁹ Nat'l Native Am. Boarding Sch. Healing Coal., US Indian Boarding School History, <https://boardingschoolhealing.org/us-indian-boarding-school-history/>; David Wallace Adams, Education for Extinction: American Indians and the Boarding School Experience, 1875–1928 (1995).

³⁰ Hillsborough Cnty. Pub. Schs., Dress Code Policy 2 (2025–26), Hillsborough Cnty. Pub. Schs., Dress Code Policy 2 (2025–26), https://core-docs.s3.us-east-1.amazonaws.com/documents/asset/uploaded_file/5557/turnerbertels/6048715/Dress_Code_Policy_25-26.pdf.

³¹ Memphis-Shelby Cnty. Schs., 2025–26 Student-Parent Handbook 21 (2025), <https://www.scsk12.org/eda/files/25/2025-26%20Student%20Parent%20Handbook%2008042025.pdf>; Cent. Bucks Sch. Dist., Physical Education Dress Code Guidelines, <https://www.cbsd.org/teaching-and-learning/health-physical-education/physical-education-dress-code-guidelines>.

³² GAO-23-105348, supra note 5, at 11.

³³ Paige Joki et al., ELC-PA, We Need Supportive Spaces That Celebrate Us: Black Girls Speak Out About Public Schools (2023), <https://www.elc-pa.org/wp-content/uploads/2023/05/FINAL-Supportive-Spaces-for-web.pdf>.

³⁴ Northside Indep. Sch. Dist., Dress and Grooming (approved Aug. 2, 2022), <https://www.nisd.net/sites/default/files/documents/dress-and-grooming-2022.pdf>.

³⁵ GAO-23-105348, supra note 5, at 9.

³⁶ GAO-23-105348, supra note 5, at 9.

³⁷ Nat'l Women's L. Ctr., Dress Coded: Black Girls, Bodies, and Bias in D.C. Schools 16 (2018), https://nwlc.org/wp-content/uploads/2018/04/5.1web_Final_nwlc_DressCodeReport.pdf.

³⁸ Paige Joki et al., supra note 33, at 21–22.

³⁹ Nat'l Women's L. Ctr., Dress Coded, supra note 37, at 16.

⁴⁰ Rebecca Epstein, Jamilia J. Blake & Thalia González, Girlhood Interrupted: The Erasure of Black Girls' Childhood 2 (Geo. L. Ctr. on Poverty & Inequality 2017), <https://genderjusticeandopportunity.georgetown.edu/wp-content/uploads/2020/06/girlhood-interrupted.pdf>.

⁴¹ N.Y.C. Pub. Schs., Dress Code Guidelines (last visited July 14, 2026), <https://www.schools.nyc.gov/school-life/school-environment/dress-code-guidelines>.

⁴² Pinellas Cnty. Schs., Code of Student Conduct 59 (2025–2026), <https://resources.finalsite.net/images/v1760115590/pcsborg/vg2trnbexlemy9miodsh/student-code-2025-rev2oct2025.pdf>.

⁴³ Pinellas Cnty. Schs., supra note 42, at 59.

⁴⁴ Pinellas Cnty. Schs., supra note 42, at 59.

⁴⁵ GAO-23-105348, supra note 5, at 5 (describing the range of exclusionary disciplinary measures that districts may use to enforce dress codes).

⁴⁶ GAO-23-105348, supra note 5, at 5.

- ⁴⁷ See 22 Pa. Code § 12.6(b)(2) (permitting public schools in Pennsylvania to impose "permanent expulsion for the school rolls," after required due process is followed, regardless of the age of the student).
- ⁴⁸ Nat'l Women's L. Ctr., *Dress Coded II: Protest, Progress and Power in D.C. Schools* (Sept. 4, 2019), <https://nwlc.org/resource/dresscoded-ii/>; GAO-23-105348, *supra* note 5, at 25.
- ⁴⁹ GAO-23-105348, *supra* note 5, at 25.
- ⁵⁰ GAO-23-105348, *supra* note 5, at 28.
- ⁵¹ Leadership Conf. Educ. Fund et al., *supra* note 10.
- ⁵² GAO-23-105348, *supra* note 5, at 28.
- ⁵³ GAO-23-105348, *supra* note 5, at 20.
- ⁵⁴ Kathleen H. Krause et al., *Report of Unfair Discipline at School and Associations with Health Risk Behaviors and Experiences—Youth Risk Behavior Survey, United States, 2023, 73 Morbidity & Mortality Wkly. Rep. Supp. (No. 4) 69, 69 (2024)*; Ctr. on Racial & Econ. Just., *Exclusionary School Discipline and Student Health and Wellbeing: A Research Spotlight Brief 1–3* (UC L. S.F. 2025); Catherine dP. Duarte et al., *Punitive School Discipline as a Mechanism of Structural Marginalization with Implications for Health Inequity: A Systematic Review of Quantitative Studies in the Health and Social Sciences Literature*, 1519 *Annals N.Y. Acad. Sci.* 129, 132–33 (2023).
- ⁵⁵ Paige Joki et al., *supra* note 33; Nat'l Women's L. Ctr., *Dress Coded*, *supra* note 37; GAO-23-105348, *supra* note 5.
- ⁵⁶ Roberto Ortega, *Gang Related Attire: Chicax Student Experiences with High School Dress Code Policies* (Spring 2022) (M.A. thesis, Cal. State Univ. San Marcos), <https://scholarworks.calstate.edu/downloads/sq87c123f>.
- ⁵⁷ See Youth L. Ctr., *Crime, Dress Codes, and the Schoolhouse Door* (2018), <https://www.ylc.org/wp-content/uploads/2018/11/CrimeDressCode.pdf>.
- ⁵⁸ Youth L. Ctr., *supra* note 57.
- ⁵⁹ Erica Rodarte, ACLU of Idaho, *Proud to Be Brown: Punishing Latine Culture in Idaho Schools* 5 (2023), https://www.acluidaho.org/app/uploads/drupal/sites/default/files/field_documents/aclu_id_proud_to_be_brown_july_2023.pdf.
- ⁶⁰ Nat'l Women's L. Ctr., *Dress Coded*, *supra* note 37, at 13.
- ⁶¹ Paige Joki et al., *supra* note 33, at 7.
- ⁶² Paige Joki et al., *supra* note 33, at 21.
- ⁶³ Paige Joki et al., *supra* note 33, at 21.
- ⁶⁴ 43 Pa. Stat. and Cons. Stat. § 954(bb)–(dd) (West 2026); Paige Joki et al., *supra* note 33, at 22–23.
- ⁶⁵ 43 Pa. Stat. and Cons. Stat. § 954(bb)–(dd) (West 2026).
- ⁶⁶ The CROWN Act, About, <https://www.thecrownact.com/about> (reporting thirty states as of the coalition's December 15, 2025 map).
- ⁶⁷ The CROWN Act, About, *supra* note 66 (mapping the current legislative landscape of state, municipal, and local CROWN Act protections). Protections vary by jurisdiction. See, e.g., Or. Rev. Stat. § 659A.001(10) (protective hairstyles "include[], but [are] not limited to, braids, regardless of whether the braids are created with extensions or styled with adornments, locs and twists"); Colo. Rev. Stat. § 24-34-301 (protecting "braids, locs, twists, tight coils or curls, cornrows, Bantu knots, Afros, and headwraps"); Austin, Tex., Ordinance No. 20220609-092 (June 9, 2022) (protecting styles "includ[ing] but not limited to afros, Bantu knots, braids, cornrows, curls, locs, twists, or hair that is tightly coiled or tightly curled").
- ⁶⁸ See NAACP Legal Def. Fund, *Natural Hair Discrimination: Frequently Asked Questions*, <https://www.naacpldf.org/natural-hair-discrimination/> (noting that specifics of the law vary from state to state and among localities).
- ⁶⁹ See *supra* note 66 (enumerating protective styles and adornments across jurisdictions); see also *infra* note 72.
- ⁷⁰ See, e.g., 43 Pa. Stat. and Cons. Stat. § 954(cc) (protective hairstyles "not limited to" locs, braids, twists, coils, Bantu knots, afros and extensions); Phila., Pa., Fair Practices Ordinance § 9-1102(e), (m.1), (v.1) (2020) (protective and cultural hairstyles "include, but are not limited to" braids, cornrows, locs, Bantu knots, Afros, and twists, including styles created with extensions or adorned by hair ornaments such as ribbon, headwraps, beads, or barrettes); Pittsburgh, Pa., Code tit. 6, §§ 651.04(uu)–(vv), 659.02–659.04 (2020) (protecting styles created or maintained with hair extensions or treatments or adorned by hair ornaments, beads, or headwraps); see ELC-PA, *supra* note 78, at 5 & n.30.
- ⁷¹ See *Fed. Land Bank of St. Paul v. Bismarck Lumber Co.*, 314 U.S. 95, 100 (1941) (explaining that the term "including" "is not one of all-embracing definition, but connotes simply an illustrative application of the general principle"); see also Antonin Scalia & Bryan A. Garner, *Reading Law: The Interpretation of Legal Texts* 132–33 (2012) (describing the presumption that "include" introduces a non-exhaustive list).
- ⁷² N.J. Stat. Ann. § 10:5-5(vv)–(ww) (as amended by P.L. 2019, c. 272); *id.* § 10:5-5(l) (defining "place of public accommodation" to include kindergartens and primary and secondary schools).

- ⁷³ Mass. Gen. Laws ch. 71, § 1D (2022) (prohibiting school districts, public schools, and other school organizations from adopting or implementing any policy or code that "impairs or prohibits a hairstyle that is historically associated with race"); see Act of July 26, 2022, ch. 117, 2022 Mass. Acts (CROWN Act).
- ⁷⁴ 43 Pa. Stat. and Cons. Stat. § 954(l) (defining "public accommodation, resort or amusement" to include "kindergartens, primary and secondary schools, high schools, academies, colleges and universities, extension courses and all educational institutions under the supervision of this Commonwealth").
- ⁷⁵ Pennsylvania Human Relations Act, 43 Pa. Stat. and Cons. Stat. § 953 (West 2026).
- ⁷⁶ Pa. Hum. Rels. Comm'n, C.R.O.W.N. Protections, <https://www.pa.gov/content/dam/copapwp-pagov/en/phrc/phrc-outreach/english/hair%20discrimination.pdf>.
- ⁷⁷ Pennsylvania Human Relations Act, 43 Pa. Stat. and Cons. Stat. § 954(dd) (West 2026).
- ⁷⁸ ELC-PA, Fact Sheet: CROWN Act Prohibits Racial Hair Discrimination 3 (Feb. 2026), <https://www.elc-pa.org/wp-content/uploads/2026/01/ELCPA-CROWN-Act-Fact-sheet.pdf>.
- ⁷⁹ Pennsylvania Human Relations Act, 43 Pa. Stat. and Cons. Stat. § 954(dd) (West 2026).
- ⁸⁰ ELC-PA, supra note 78, at 3.
- ⁸¹ GAO-23-105348, supra note 5, at 14 (highlighting the particularized harms Black students face from dress code rules "specifically naming durags or other styles of hair wraps").
- ⁸² ELC-PA, supra note 78.
- ⁸³ Pittsburgh Pub. Schs., Code of Student Conduct 22 (2025-2026), https://resources.finalsite.net/images/v1765299498/pghschoolsorg/ic8ab40gzk57hj8do22r/PPS-2025-Code_of_Conduct.pdf.
- ⁸⁴ School District of Philadelphia, Coatesville Area School District, Pittsburgh Public Schools, Allentown School District, Central Bucks School District, San Francisco Unified School District, Portland Public School District, New York City Public Schools, Chicago Public Schools, Los Angeles Unified School District, Hillsborough County School District, Houston Independent School District, The School District of Palm Beach County Florida, Seattle Public Schools, Clark County School District, Broward County Public Schools, Fairfax County Public Schools, Pinellas County Schools, Gwinnett County Public Schools, Montgomery County Public Schools, Wake County Public School System, Dallas Independent School District, Prince George's County Public Schools, Baltimore County Public Schools, Memphis Shelby County Schools, Cobb County School District, Northside Independent School District, Polk County Public Schools, San Diego Unified School District, Jefferson County Public Schools
- ⁸⁵ Polk Cnty. Pub. Schs., Code of Student Conduct v (2026-2027), https://cdns5-ss20.sharpschool.com/UserFiles/Servers/Server_3007318/File/About%20PCPS/Policies%20Procedures%20and%20Forms/26-27CodeOfStudentConductRev2608.pdf.
- ⁸⁶ N.Y.C. Pub. Schs., supra note 41; Sch. Dist. of Phila., Code of Conduct 9 (2024-2025), <https://www.philasd.org/studentrights/wp-content/uploads/sites/67/2024/06/Code-of-Conduct-24-25-1.pdf>.
- ⁸⁷ Seattle Pub. Schs., Student Dress (Sept. 3, 2024), <https://www.seattleschools.org/about/school-board/policies/3224-student-dress/>.
- ⁸⁸ Northside Indep. Sch. Dist., supra note 34.
- ⁸⁹ Sch. Dist. of Phila., Code of Conduct 9 (2024-2025), <https://www.philasd.org/studentrights/wp-content/uploads/sites/67/2024/06/Code-of-Conduct-24-25-1.pdf>.
- ⁹⁰ Portland Pub. Schs., Standards of Conduct - Student Dress and Grooming (amended July 2016), <https://resources.finalsite.net/images/v1751565410/ppsnet/m3l3ffzsbfwkohnpsgs2m/430012-PStandardsOfConduct-StudentDressandGrooming.pdf>.
- ⁹¹ Seattle Pub. Schs., supra note 87.
- ⁹² Allentown Sch. Dist., Student & Family Handbook: Guiding Light - A Code of Conduct for Thriving Together (2025-2026), <https://www.allentownsd.org/families-and-students/student-handbook>.
- ⁹³ Fairfax Cnty. Pub. Schs., Student Rights and Responsibilities: A Guide for Families 15 (2025-2026), https://www.fcps.edu/system/files/forms/2025-07/srr-booklet-2025-26-july_2025.pdf.
- ⁹⁴ Sch. Dist. of Palm Beach Cnty., Student Code of Conduct: Secondary (Grades 6-12) (2025-2026), <https://resources.finalsite.net/images/v1759845289/palmbeachschoolsorg/palmbeachschoolsorg/gozg921l2sqktvh7vgpb/FY26StudentCodeofConduct-Secondary.pdf>.