of unlawfully terminating and restricting employees who used prescribed pain medications. Since at least January 2020, tire manufacturer The Carlstar Group, LLC (Carlstar), denied employment and promotion opportunities at its plants in Tennessee and South Carolina to workers who were found to be using legally prescribed narcotics and opioids for disabilities. The U.S. Equal Employment Opportunity Commission (EEOC) filed a lawsuit in federal district court alleging that the company had summarily disqualified these individuals under its blanket drug testing and substance abuse policies, failing to provide or consider reasonable accommodations, even after the workers received formal medical clearance that they could safely execute their job duties. The EEOC argued that this strict, one-size-fits-all exclusion policy violated the Americans with Disabilities Act (42 U.S.C. § 12131). On April 15, 2026, Carlstar agreed to a settlement - Carlstar will pay a total of $300,000 in monetary relief to five affected employees, overhaul its substance abuse accommodations framework, implement mandatory supervisor training, and submit periodic compliance reports to federal regulators for a five-year period. (Return to In This Issue)

THIRD CIRCUIT RULES PRISONER'S REMOVAL FROM MAT PROGRAM DID NOT VIOLATE THE EIGHTH AMENDMENT OR THE ADA

***Jonathan DiFraia v. Keven Ransom, et al.*, U.S. Court of Appeals for the Third Circuit, Case No. 24-2673 (opinion filed March 31, 2026).** The Third Circuit dismissed a Pennsylvania state prisoner's lawsuit ruling that his removal from the prison's medication for addiction treatment (MAT) program was lawful. Jonathan DiFraia is an inmate in a Pennsylvania prison and has a history of opioid use disorder (OUD). Because of his OUD, DiFraia received buprenorphine as part of the prison's MAT program. One day, while in the medication line to receive his MAT, guards strip-searched DiFraia and discovered an e-cigarette with a cap on it in his possession. The guards accused DiFraia of using the cap to divert his MAT to other prisoners, which DiFraia denied. A week later, the guards again alleged that DiFraia was diverting his MAT, which he continued to deny. Three days later, DiFraia met with the prison physician, who informed him that he was being removed from the program for diversion. The physician tapered DiFraia off of his buprenorphine over the next week, and he soon began suffering from withdrawal symptoms. DiFraia wrote to the superintendent and other prison officials asking to be put back on his MAT, but they refused. In response, DiFraia filed a pro se lawsuit against multiple prison officials asserting that they violated the Eighth Amendment of the U.S. Constitution and Title II of the Americans with Disabilities Act (ADA; 42 U.S.C. § 12132) by removing him from the MAT program. The district court dismissed DiFraia's claims, and he appealed. For the Eighth Amendment claim, DiFraia argued that prisons can only deny medical care based on an individualized medical judgment and that denying necessary medical treatment based on a non-medical reason qualifies as deliberate indifference. The court noted that not all non-medical considerations for denying medical treatment to a prisoner are per se banned under the Eighth Amendment and determined that DiFraia's removal from the MAT program did not amount to deliberate indifference. The court determined that there was no evidence that his removal from the program was due to retaliation or intentional infliction of harm, and that DiFraia simply disagreed with the decision to be taken off MAT. Additionally, the court noted that DiFraia never alleged that his buprenorphine was medically necessary to manage his OUD and that even if he had, "diverting medication suggests that one no longer needs it." The court reasoned that "prison officials cannot be deliberately indifferent to a medical need that no longer exists." For the ADA claim, the court agreed with the district court's dismissal of the claim, finding that DiFraia was not removed from the MAT program because of his disability, but rather "despite it." The court concluded by stating that: "Prisoners do not get all the medical care that they want. Even if they suffer because prison officials deny them care, that alone is not enough to violate the Eighth Amendment or the [ADA]." (Return to In This Issue)