



Non-Discrimination & Title IX Policy

Resolution # 041720241

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1. Introduction and Commitment to Equity

Laboratory Charter School of Communication and Languages (“LAB” or “the School”) is fully committed to providing an educational environment free from discrimination, harassment, and retaliation. In accordance with Title IX of the Education Amendments of 1972 (20 U.S.C. §§ 1681–1688; 34 C.F.R. Part 106), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794), the Americans with Disabilities Act of 1990 (42 U.S.C. §§ 12101–12213), the Pennsylvania Human Relations Act (43 P.S. §§ 951–963), the Pennsylvania Fair Educational Opportunities Act (24 P.S. §§ 5001–5009), and the Philadelphia Fair Practices Ordinance and Commission on Human Relations Regulation No. 9, LAB strictly prohibits

discrimination in any of its educational programs, activities, and employment practices. This commitment applies to all aspects of school operations, including admissions, academic and extracurricular programming, counseling services, athletics, employment, discipline, and access to facilities. Protected categories include sex, race, color, religion, national origin, immigration status, ethnicity, age, disability, sexual orientation, gender identity or expression, pregnancy or parental status, veteran status, or any other legally protected category.

2. Zero Tolerance for Discrimination, Harassment, and Retaliation

LAB maintains a zero-tolerance stance toward sex discrimination, sexual harassment, and retaliation as defined under Title IX and Pennsylvania law. Sex discrimination includes any act of exclusion, denial of benefits, or different treatment based on sex, sexual orientation, gender identity, or pregnancy. Sexual harassment encompasses quid pro quo harassment by a school employee, unwelcome conduct that is so severe, pervasive, and objectively offensive that it denies a person equal access to educational programs or activities, and incidents constituting sexual assault, dating violence, domestic violence, or stalking under 34 C.F.R. § 106.30. Retaliation, defined under 34 C.F.R. § 106.71 and 43 P.S. § 955(d), is any materially adverse action taken against an individual for reporting discrimination or participating in an investigation.

Expanded Definitions of Sexual Harassment (per 34 C.F.R. § 106.30)

- **Quid Pro Quo Harassment:** An employee conditions an aid, benefit, or service on participation in unwelcome sexual conduct.
 - **Hostile Environment Harassment:** Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access.
 - **Sexual Assault:** As defined in 20 U.S.C. 1092(f)(6)(A)(v).
 - **Dating Violence:** As defined in 34 U.S.C. 12291(a)(10).
 - **Domestic Violence:** As defined in 34 U.S.C. 12291(a)(8).
 - **Stalking:** As defined in 34 U.S.C. 12291(a)(30).
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3. Title IX Coordinator Contact Information

To ensure compliance, LAB designates a Title IX Coordinator who also oversees non-discrimination compliance under federal and state law. All inquiries concerning the application of Title IX and this policy should be directed to:

Joan Belynda Brown, CHRMP, MBA

Director of Human Resources / Title IX Coordinator

Laboratory Charter School

926 W. Sedgley Avenue, Philadelphia, PA 19140

Office: 267-817-4720

Email: j.brown@labcharter.com

In addition, inquiries may also be directed to the U.S. Department of Education’s Office for Civil Rights – Philadelphia Office, The Wanamaker Building, 100 Penn Square East, Suite 515, Philadelphia, PA 19107 (Phone: 215-656-8541, Email: OCR.Philadelphia@ed.gov) or to the Pennsylvania Human Relations Commission (PHRC) at <https://www.phrc.pa.gov>.

4. Reporting Discrimination, Harassment, or Retaliation

Any student, employee, or third party who believes they have been subjected to discrimination, harassment, or retaliation may submit a verbal or written complaint to the Title IX Coordinator or any LAB administrator at any time, including outside normal business hours. LAB accepts complaints in person, by mail, by telephone, or by electronic mail, and reports may also be submitted anonymously where permitted by law. Consistent with 34 C.F.R. § 106.44, LAB will promptly respond to all reports of sex discrimination and will offer supportive measures—including academic adjustments, schedule changes, counseling referrals, and increased monitoring—to protect the safety of the complainant and ensure equal access to educational programs.

5. Grievance Procedures

Formal complaints of sex discrimination or sexual harassment trigger LAB’s grievance procedures, which provide for a prompt, fair, and impartial investigation and resolution. These procedures comply with 34 C.F.R. §§ 106.45–106.46 and include the following steps:

- **Filing a Complaint:** A complainant or the Title IX Coordinator may file a formal complaint.
- **Notice of Allegations:** Written notice of allegations to all known parties.
- **Investigation:** Prompt, fair, and impartial investigation; both parties may present evidence and have an advisor.
- **Evidence Review:** Parties may inspect and respond to evidence before completion of the investigative report.
- **Investigative Report:** Summarizes relevant evidence and sent to each party for review.
- **Determination of Responsibility:** Decision-maker issues written determination applying preponderance of evidence standard.
- **Appeals:** Either party may appeal on permitted grounds within 10 days.
- **Informal Resolution:** Offered when appropriate and agreed to by both parties (except in cases involving employee harassment of a student).
- **Supportive Measures:** Available before or after a formal complaint and kept confidential to the extent possible.
- **Prohibition on Retaliation:** No intimidation, threats, coercion, or discrimination against anyone exercising Title IX rights.
- **Recordkeeping:** Title IX Coordinator maintains all records for at least seven years.

6. Accessibility and Accommodations

LAB complies with the Americans with Disabilities Act (42 U.S.C. § 12132) and Section 504 of the Rehabilitation Act (29 U.S.C. § 794) by ensuring that all programs and facilities are accessible to individuals with disabilities and that appropriate accommodations are provided upon request. This policy, as well as information about how to request accommodations or language assistance, will be posted on LAB's website and included in student, parent, and employee handbooks. It is also available in alternative formats or languages upon request to the Title IX Coordinator.

7. Training and Awareness

In alignment with 34 C.F.R. § 106.8(b), all employees and students will receive annual training on the scope of Title IX, how to recognize and report sex discrimination, and the responsibilities of school personnel. Training materials will be posted on LAB’s website or made available upon request to ensure transparency.

8. Policy Review and Updates

This Non-Discrimination and Title IX Policy will be reviewed annually or more frequently as required by changes in federal or Pennsylvania law. Updates will be promptly posted on LAB’s website and distributed to the school community to maintain compliance and transparency.

Approved by Laboratory Charter School Board – September 2025
