



**HVERFORD
COLLEGE**

**Anti-Discrimination,
Harassment, and Bias Policy
PROPOSAL**

AY 2023-24

**Institutional Diversity,
Equity, And Access (IDEA)**

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Anti-Discrimination, Harassment, and Bias Policy and Response Protocol

Haverford College is committed to the continuous development of a campus environment in which all members of its community are affirmed, respected, and valued as individuals and have equitable access to its employment and educational programs, related activities, and opportunities.

Pursuant to the College's mission and commitment to creating and maintaining a learning, working, and living environment free from discrimination, this **Anti-Discrimination, Harassment, and Bias Policy** has been established and set forth by the College. The policy explicitly prohibits specific forms of discrimination, harassment, and bias on the basis of race, color, sex/gender (including pregnancy, childbirth, related conditions, and lactation), religion, age, national origin, ancestry, citizenship, disability, status as a medical marijuana cardholder, genetic information, gender identity or expression, sexual orientation, current or past membership or service in the U.S. Armed Forces or a state military unit, or any other legally prohibited basis in accordance with federal, state, and city laws. The Policy details a response protocol for all good faith reports of alleged discrimination, harassment, bias, and retaliation.

Acts of discrimination, harassment, and bias violate the College policy and are antithetical to the mission, values, and standards of the College. To that end, the College welcomes and encourages all students, employees, and community members to join together in a commitment to creating a just and equitable environment for all.

I. STATEMENT OF ANTI-DISCRIMINATION, HARASSMENT, AND BIAS

Haverford College is committed to admitting and providing holistic services and opportunities for students; recruiting, employing, retaining, promoting, and providing benefits to employees; and providing an educational, employment, and living environment free from all forms of discrimination, harassment, and bias on the basis of race, color, sex/gender (including pregnancy, childbirth, related conditions, and lactation), religion, age, national origin, ancestry, citizenship, disability, status as a medical marijuana cardholder, genetic information, gender identity or expression, sexual orientation, current or past membership or service in the U.S. Armed Forces or a state military unit, or any other legally prohibited basis in accordance with federal, state, and city laws. Under this Anti-Discrimination, Harassment, and Bias Policy, the College also includes in its protected categories: socioeconomic status, caste, colorism, body size and shape, and political views or affiliation. It is also the College's policy to provide reasonable accommodations in accordance with applicable law where required because of an individual's religion or disability.

The College acknowledges and intends to comply with its legal responsibilities in all of its programs, activities, and opportunities. This Anti-Discrimination, Harassment, and Bias Policy is separate and distinct from, and is consistent with, the College's obligations as set forth in [Title IX of Educational Amendments of 1972](#), or any other law or regulation that prohibits discrimination on the basis of any legally protected category in any educational program or activities receiving federal financial assistance. The U.S. Department of Education, which enforces Title IX, has defined the meaning of Title IX's prohibition on sex discrimination broadly to include various forms of sexual harassment and sexual violence that interfere with an individual's ability to equally access educational programs and opportunities. The College will also comply with its obligations under [Title VII of Civil Rights Act of 1964](#), as amended, protecting employees and job applicants from employment discrimination based on race, color, religion, sex, and national origin; [Title VI of Civil Rights Act of 1964](#) protecting any person, on the ground of race, color, or national origin, from exclusion from participating in any program or activity receiving federal financial assistance; [Section 504 of the Rehabilitation Act of 1973](#) and [Americans with Disabilities Act of 1990](#) that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the

general public. If any provisions of the College's Anti-Discrimination, Harassment, and Bias Policy are in contradictions to or interfere with any federal or state law, that law will supersede the College's policy provisions.

II. TO WHOM THE POLICY APPLIES

This policy applies to the Haverford community, including all students, staff, faculty, members of the Board of Managers and Corporation of Haverford College, volunteers, and visitors. Visitors include alumni, parents, other family members, and individuals from the community, i.e. guest speakers, vendors, contractors, and other individuals who participate in or perform services for the College.

The policy applies to all Haverford College settings, including but not limited to College-sponsored research, internship, mentorship, academic meetings, work-related meetings, summer session, or other affiliated programs. It also applies to off-campus settings where any College-related business or educational programs may occur, study-abroad programs, conferences, other institutions, or any online platforms or via any other electronic medium.

III. DEFINITIONS

DEFINITIONS

Protected Class and Protected Categories

A Protected Class is a group of individuals who share a specific common social identity and status, and who are legally protected from discrimination on the basis of that characteristic. Characteristics protected by the law include race, color, sex/gender (including pregnancy, childbirth, related conditions, and lactation), religion, age, national origin, ancestry, citizenship, disability, status as a medical marijuana cardholder, genetic information, gender identity or expression, sexual orientation, current or past membership or service in the U.S. Armed Forces or a state military unit.

In addition to the Protected Class, the College has outlined the following characteristics, i.e. socioeconomic status, caste, colorism, body size and shape, and political views or affiliation as Protected Categories covered under this Anti-Discrimination, Harassment, and Bias Policy.

Privacy. Any information related to a report or investigation will be treated with the utmost discretion. As 'private' information, it will be shared only with individuals who "need to know" for the purpose of completing a fair and complete inquiry and investigation, and facilitating appropriate resolutions.

Confidentiality. Confidentiality is defined as any information provided on the report or during an investigation that cannot be shared by a members of the Bias Reporting Committee (BRC), Bias Incident Response Team (BIRT), or any individuals without explicit permission of the reporting individuals; and in compliance with Family Education Rights & Privacy Act (FERPA), Health Insurance Portability and Accountability Act of 1996 (HIPAA), or other College policies. Depending on the nature of the case (e.g. sexual violence or hate crimes), conducting a fair and complete inquiry may require that the full details of the incident, including the identities of the reporting and responding individuals be shared with Campus Safety and law enforcement agencies. In those instances, all parties will receive communication about the College's obligation.

Retaliation. Retaliation is defined as an adverse action, ie. intimidating, threatening, coercing, or discriminating conduct, taken by a responding individual or other individuals against anyone who has filed a report, provided testimony, assisted, or participated in any manner during the investigation.

Formal Report or Complaint

A formal notification to a college officer of a perceived or actual violation of the College Policy.

Reporting Individual/Complainant

An individual who formally makes a report of a perceived or actual violation of the College Policy

Responding Individual/Respondent

An individual who has been named in a formal report as allegedly violating the College's Policy.

Witness in the First Degree

Individuals named by the reporting individual as being present during the reported incident.

Appellate Officer

An individual designated by the Haverford College to receive and review appeals.

IV. PROHIBITED CONDUCT

Discrimination

Discrimination, under this policy, is defined as conscious or unconscious, verbal, written, visual, or physical conduct based on an individual's actual or perceived membership in a Protected Class and/or Protected Categories that:

- involves inequitable or adverse treatment of a person, and
- undermines, detracts from, or interferes with an individual's right or ability to participate in and/or receive the opportunities—or affects the terms—of an individual's education or employment.

Discrimination also includes any conduct that constitutes a violation under the law of the jurisdiction in which conduct occurs.

Harassment

Harassment is defined as a form of discrimination where verbal or physical behavior is directed at an individual based on that individual's actual or perceived membership in a Protected Class and/or Protected Categories that:

- creates an intimidating or hostile educational, work, or living environment, and
- undermines and detracts from or interferes with an individual's right or ability to fully participate in and/or receives the opportunities, or affects the terms of an individual's education or employment.

Harassment may consist of a single incident or the cumulative result of a series of pervasive incidents. Under this policy, bullying and cyberbullying are forms of harassment that use an imbalance of power to intimidate, threaten, and cause emotional or physical harm; impact an individual's ability to fully participate in educational, work, or living environments.

Bias

Biased conduct is defined as any intentional or unintentional, verbal, written, visual, or physical conduct based on an individual's actual or perceived membership in a Protected Class and/or Protected Categories that:

- demeans or intimidates individuals; may include derogatory language, and
- undermines and detracts from or interferes with an individual's right or ability to fully participate in and/or receives the opportunities—or affects the terms—of an individual's education or employment.

Hate Crimes

Hate crimes are criminal offenses defined by federal and state law. Federal and state statutes on hate crime vary in terms of the acts and categories of bias that are covered. Under Pennsylvania Law, Title 18, Section 2710, a hate crime, termed “ethnic intimidation”, is defined as a criminal act motivated by ill will or hatred toward a victim's race, color, religion, or national origin. The Federal Bureau of Investigation defines a hate crime as a “criminal offense against a person or property motivated in whole or in part by an offender’s bias against a race, religion, disability, ethnic origin or sexual orientation.”

While not all bias incidents involve criminal acts, all hate crimes as criminal acts are classified as bias conduct under the College’s policy. The process for determining whether an incident is a crime, and possibly a hate crime, is a legal matter to be determined by law enforcement officials.

V. EXPRESSIVE FREEDOM AND ACADEMIC INTEGRITY

This policy is consistent with Haverford College’s Policy on Expressive Freedom and Responsibility, which states that the College affirms all students’ right to free inquiry, assembly, and expression in the broad context of its educational mission. This policy is not intended to interfere with, nor shall it be interpreted as interference with, protected speech and freedom of expression. Consistent with the College’s commitment to expressive freedom, inquiry, assembly, and expression of dissent through peaceful protests do not violate this policy.

The College recognizes that a learning environment that encourages free inquiry and open-minded, robust discussion, and intellectual debate, at times may cause discomfort for its participants. However, the College does not protect or tolerate behaviors on campus that may cause harm by constituting targeted harassment or bias. Forms of expression made in the context of power imbalances can intimidate and threaten, and have the potential to cause emotional, physical, and social harm, and might impact an individual’s ability to fully participate in educational, work, or living environments.

VI. CONFIDENTIALITY

Haverford College is committed to making reasonable efforts to protect the confidentiality and privacy interests of reporting individuals, responding individuals, first-degree witnesses, and/or other individuals involved in the report and/or the formal investigation. All reports and investigations will be handled with sensitivity and discretion.

LEVELS OF CONFIDENTIALITY

The following guidelines define the various levels of confidentiality that may be requested by individuals and respected by the College. However, in cases that require the College to comply with applicable laws, assurance of confidentiality may be limited.

Confidentiality in General Inquiries

Any members of the College may make a confidential, general inquiry about a policy or response protocol to a College employee or members of the team handling complaints. A general inquiry does not constitute a report, and inquiries may be referred to members of the Bias Response Committee (BRC).

Confidentiality of the Reporting Individuals

Reporting individuals may opt for in any of the following levels of confidentiality:

- **Full Anonymity.** Reporting individuals may wish to withhold their identity for the entirety of the report and investigation. Depending on the nature of the incident reported, the College's ability to complete a fair and complete preliminary inquiry and an investigation, facilitate resolutions, and provide supportive measures and resources may be impeded if the identity of the individual is not provided.
- **Partial Disclosure.** Reporting individuals may wish to provide their identity and request that it be held in confidence and disclosed only to the Bias Reporting Committee (BRC), the team that will receive the report and will conduct the initial screening. If individuals request that their identity remain confidential and disclosed only to the Bias Reporting Committee (BRC), the team will endeavor to do so to the extent practicable and permitted by the College policy and applicable laws. Depending on the nature of the case (e.g. sexual violence or hate crimes), a fair and complete inquiry may require that the full details of the incident, including the identities of the reporting and responding individuals, be shared with Campus Safety and law enforcement agencies. In those instances, all parties will receive communication about the College's obligation under the law.
- **Full Disclosure.** Reporting individuals may wish to share their identity and other identifiable information. The Bias Reporting Committee (BRC) and Bias Incident Response Team (BIRT) will maintain confidentiality to the extent possible, as necessary for the investigation, and in compliance with such as Family Education Rights & Privacy Act (FERPA), Health Insurance Portability and Accountability Act of 1996 (HIPAA) or College policy. Depending on the nature of the case (e.g. sexual violence or hate crimes), a fair and complete inquiry may require that the full details of the incident, including the identities of the reporting and responding individuals be shared with Campus Safety and law enforcement agencies. In those instances, all parties will be notified of the College's obligation under the law of jurisdiction.

Confidentiality of the Respondents

To the extent possible, the College will maintain confidentiality of respondents, who are individuals who have been named and respond to the allegations in the report, during and after the investigation. Upon receiving the report, the Bias Incident Response Team (BIRT) will communicate with responding individuals about the individual's responsibility to respond, as well as confidentiality and other rights. If the acts that form the basis of a report violate policies established by the College's Department of Human Resources and/or the Office of the Provost, and/or may lead to criminal proceedings under applicable law (e.g. sexual violence or hate crimes), the College may be required to disclose necessary information to Campus Safety and law enforcement agencies.

Confidentiality of Record During the Inquiry and Investigation

Any records that are compiled during a formal inquiry and/or investigation, including, but not limited to, evidence shared by reporting individuals, responding individuals, and/or other individuals involved in the case; records and notes written by the Bias Reporting Committee (BRC) and Bias Incident Response Team (BIRT); copies of all reports generated as a result of the investigation; will be kept private and confidential to the extent possible. Reporting individuals and responding individuals may have access to their respective records to the extent required by the Family Educational Rights and Privacy Act (FERPA), Health Insurance Portability and Accountability Act of 1996 (HIPAA) or College policy.

Disclosure Required by Law of the Jurisdiction

Haverford College will not include the names of reporting individuals or other identifying information in publicly available reports that are compiled in Annual Security Report. The College is part of a larger community, and a variety of legal requirements and obligations may apply. If there is an investigation that constitutes policy violations set by Human Resources and/or the provost, and/or which may lead to criminal proceedings under applicable law (e.g. sexual violence or hate crimes), the parties, witnesses, and/or the College officials may be required by law disclose necessary information to Campus Safety and law enforcement

agencies. Reporting individuals may choose to notify authorities directly, with or without the College's assistance, or may choose not to notify such authorities.

Clery Act Reporting

Pursuant to the Clery Act, Haverford College includes information about crime on campus in its weekly Campus Safety Summary and its annual Security Report and annual Fire Safety Report. The information provided in the College reports will not include any identifiable information about reporting individuals, responding individuals, and/or other individuals who are involved in the report or the formal investigation.

VII. PROTECTION AGAINST RETALIATION

This policy is intended to support the practice of individuals reporting incidents of alleged discrimination, harassment, bias stated in this policy, and to prevent any retaliation. Retaliation is defined as an adverse action, ie. intimidating, threatening, coercing, or discriminating conduct taken by a responding individual or other individuals against any individuals who has filed a report, provided testimonies, assisted, or participated in any manner during the investigation. This protection includes retaliation against a bystander who intervened or attempted to stop acts of discrimination, harassment, and bias. Any individual in the College who is found to have engaged in retaliation is subject to disciplinary action.

Under this policy, the College will not take adverse action against an individual who makes a good faith allegation under this policy, even if an investigation fails to substantiate the allegation. However, individuals who are found to have made dishonest reports or make statements with willful disregard for the truth during the investigation may be subject to disciplinary action.

VIII. COMPOSITION AND DUTIES OF BIAS REPORTING COMMITTEE (BRC) AND BIAS INCIDENT RESPONSE TEAM (BIRT)

The Bias Reporting Committee (BRC) and Bias Incident Response Team (BIRT) are individuals who serve as employees of the College.

The BRC facilitates the initial screening process and determines whether the case will proceed. Depending on the nature of the case, the team may consult with, or make referrals to, appropriate campus officials, including, but not limited to, Title IX Coordinator for cases related to the discrimination on the basis of sex; Human Resources related to professional conducts for employees; Honor Council for the Honor Code violations; and senior College officials. If any case that constitutes policy violations that may lead to criminal proceedings under applicable law (e.g. sexual violence or hate crimes), the BRC may be required to contact Campus Safety and law enforcement officials. The BRC is comprised of the vice president for institutional equity and access, dean of the college, the associate provost for faculty development, and the director of employee relations.

The BIRT is responsible for assessing, completing a fair and complete inquiry, and communicating an appropriate and comprehensive institutional response to discrimination, harassment, and bias incidents. The BIRT will consult other members of the community in its response when appropriate. The goal of this policy, and the BIRT, is to take appropriate measures in responding to bias incidents, to provide educational interventions to the Haverford community, and to cultivate a campus environment that is equitable and accessible. The BIRT is comprised of one of the associate provosts, the director of employee relations, the assistant vice president for institutional equity and access, the associate dean of students diversity, equity, and inclusion (SDEI), the Title IX coordinator, and an SDEI team member-designee.

The BRC and BIRT do not have the authority to conduct disciplinary proceedings or impose disciplinary actions on students, staff, or faculty. Disciplinary matters will be referred and handled in accordance with the College policies, as applicable.

IX. REPORTING AN ACT OF DISCRIMINATION, HARASSMENT, AND BIAS

Direct Reporting

Individuals who would like to make a formal report of a violation of the policy are encouraged to report by completing the **Discrimination, Harassment, and Bias Incident Form**. The report may be filed as any of the following:

- **Impacted Party:** an individual who believes they have been subject to discrimination, harassment, or bias)
- **Witness to Incident:** an individual who is a first-degree witness
- **Support Person:** friend and/or family member to whom the impacted party disclosed
- **Designated Party:** staff or faculty member to whom the impacted party disclosed
- **Responsible Party:** an individual who would like to self-report an incident and/or would like support with mediation.

Designated Reporting

All Haverford College employees are strongly encouraged to become familiar with and follow this policy, and report instances of discrimination, harassment, and bias. This includes reporting any incident witnessed in the first-degree, or violations learned about through the disclosures of others.

Reporting for Information Only

An individual may report an incident without necessarily initiating an inquiry or investigation by the College. The College will, in most circumstances, respect an individual's request not to investigate a report, but may determine that preliminary inquiry or full investigation must be conducted in order to protect the safety of others. If the College determines that it must conduct an inquiry or investigation, it will endeavor to do so in a manner that respects the confidentiality of reporting and responding individuals to the extent possible and permitted by the law.

Time Frame for Reporting

There is no time limit on reporting a violation of this policy; however, Haverford College's ability to conduct a fair and complete investigation, and to facilitate an appropriate response, may be more limited if a significant amount of time passes. In the event that the reporting individual is no longer affiliated with the College, e.g. a report is made after a student has graduated or left the College or an employee who no longer works for the College, the College is responsible for completing the investigation to the extent possible. If the respondent, or reporting party is no longer affiliated with the College, the College is responsible for completing the investigation to the extent possible, and to providing available supportive measures and resources to the reporting individuals. In both instances, (and all other instances), the College may use the learnings and lessons of the cases to enhance the overall climate of the campus.

X. PROCEDURES FOR RESOLUTION OF COMPLAINTS

The College is required to conduct a thorough inquiry and address all reports of bias incidents of which it becomes aware. The response protocol following a report of a possible act is as follows in the following order:

A. PRELIMINARY INQUIRY. After receiving a report of an alleged bias incident, the Bias Reporting Committee (BRC) will conduct an initial screening of the report and determine if the case will proceed.

B. ASSIGNMENT. Following the conclusion of the preliminary inquiry, the BRC will determine whether the case will proceed and assign it to any one of the following next stages:

For Response/Action Request cases that will proceed: If the BRC Team determines that there is sufficient information in the report for potential violation of the policy, the team will consult and/or refer to one or more of following units, which includes:

- *Bias Incident Response Team (BIRT)* for bias-related cases
- *Human Resources* for professional conduct of employees
- *Title IX* for discrimination on the basis of sex
- *Honor Council* for cases involving a violation of the Honor Code
- *Law Enforcement* for any case that constitutes policy violations that may lead to criminal proceedings under applicable law of the jurisdiction (e.g. sexual violence or hate crimes), and the College is obligated to contact campus safety and law enforcement officials.

For Response/Action Request cases that will not proceed: If the BRC Team determines that the reported incident does not constitute an act of violation of the policy, the BRC team will communicate with the reporting individuals to inform them of the decision. If the BRC Team determines that the information provided in the report is not sufficient to draw a conclusion, the BRC team will invite the individuals to submit more information, and provide referrals to supportive measures or resources.

For Information Request Only: For reports where the individuals indicate that the report is for informational purposes only, the report will be filed for inclusion in (a) de-identified data reports and (b) community reports, and integration into campus education and programs, when appropriate.

C. BIAS INCIDENT RESPONSE TEAM (BIRT) REVIEW AND DETERMINATION. After the case is assigned to BIRT, the team will review the information available for an assessment of whether the incident reported constitutes discrimination or harassment, as defined in this Anti-Discrimination, Harassment, and Bias Policy.

- The BIRT Team will communicate with the reporting individuals about rights, opportunities to engage, the BIRT Committee composition, and options to invite an advocate person as support.
- The BIRT Team will also communicate with the respondent who is named in the report about rights, the responsibility to respond, the BIRT Committee composition, and the option to invite an advocate person as support.

If the BIRT Team determines that there is sufficient information to launch a formal investigation, the BIRT will notify the reporting individual and responding individuals with a written notice about the launch of the investigation.

Protective Actions

Based on the nature of the alleged conduct, the College may suggest protective actions prior to launching a formal investigation. The protective actions may include, but are not limited to, changes in campus housing; limits on participation in student activities; changes in academic or employment schedule, arrangement, or supervision; withdrawal from academic projects; and temporary leave for faculty or staff.

D. FORMAL INVESTIGATION. The BIRT is committed to conducting a fair, comprehensive, and complete investigation for reports of alleged acts of discrimination, harassment, and bias incidents. The BIRT may undertake any of the following steps in gathering information:

- Consult with appropriate campus officials on a confidential basis
- Meet the reporting individuals and responding individuals
- Meet other individuals who may be involved in the incident, may be first degree witnesses, and/or may be individuals to whom the reporting individuals disclosed the information

Over the course of an investigation, the BIRT may make referrals to any of the following individuals and/or consult specified resources:

- Dean of the College and the Student Handbook for complaints of discrimination, harassment, and bias by *students*
- Human Resources and Employee Handbook for complaints of discrimination, harassment, and bias by *staff*
- Provost Office, Human Resources, and Faculty Handbook for complaints of discrimination, harassment, and bias by a member of the *faculty*

Period of Investigation

The BIRT will endeavor to complete all formal investigations within 90 days of notifying the individuals that a formal investigation has commenced. In cases requiring a longer period of time, the BIRT will extend the investigation for 30 days and notify (in a timely fashion) all individuals involved.

E. RESOLUTIONS. Following an appropriate investigation, the BIRT will determine an appropriate response. The team will notify the reporting and named individual(s) of the BIRT's findings, and offer resources including, but not limited to, any one or more of the following:

- Restorative practices facilitated by the [Restorative Practices Team](#) for mediated conversation with the reporting individuals, responding individuals, and any other individuals who are involved in the investigation. Other forms of mediation may include written communications, listening sessions, training, and educational opportunities
- Changes in status or relationship to the community
- Policy-change recommendations and/or updates to existing policy
- Disciplinary action
- Supportive measures or resources that may include referral to counseling, campus and off-campus resources, etc.

XI. APPEAL

The reporting individuals and responding individuals have the right to appeal the final decision and outcome determined by the BIRT. Requests for appeal must be submitted in writing to the Appellate Officer, who is authorized by Haverford College to evaluate the appeal, within 10 business days following the receipt of notice that investigation is complete. Appeals must be based on one or more of the following grounds:

- New evidence that was not available at the time of the investigation
- Procedural errors during the investigation

If an appeal is granted, the Appellate Officer may, at their discretion, reopen the case, consider the additional information, and consult with BRC, BIRT, and other individuals as appropriate.

XII. COMMITMENT TO TRANSPARENCY

Haverford College is committed to transparency about its policies and procedures. It is therefore committed to:

- Educating members of the College community about cultivating a fair and equitable educational, work, and living environment, and prompting community conversation and dialogues.
- Creating a de-identified and aggregate record of incidents and behaviors on campus or in the local

community and the resolutions.

- Evaluating the effectiveness of College policies and processes that uplift the mission, vision, and standards of the College.

XIII. RESPONSIBILITIES

All individuals to whom this applies are encouraged to become familiar with, and follow this policy. College employees who operate with any level of leadership responsibilities, such as managers and supervisors, are responsible for promoting an awareness and understanding of this policy, and for taking appropriate steps to help ensure compliance with its terms.

First approved/Last revised, Month XX, 2023

Effective date, Month XX, 2023

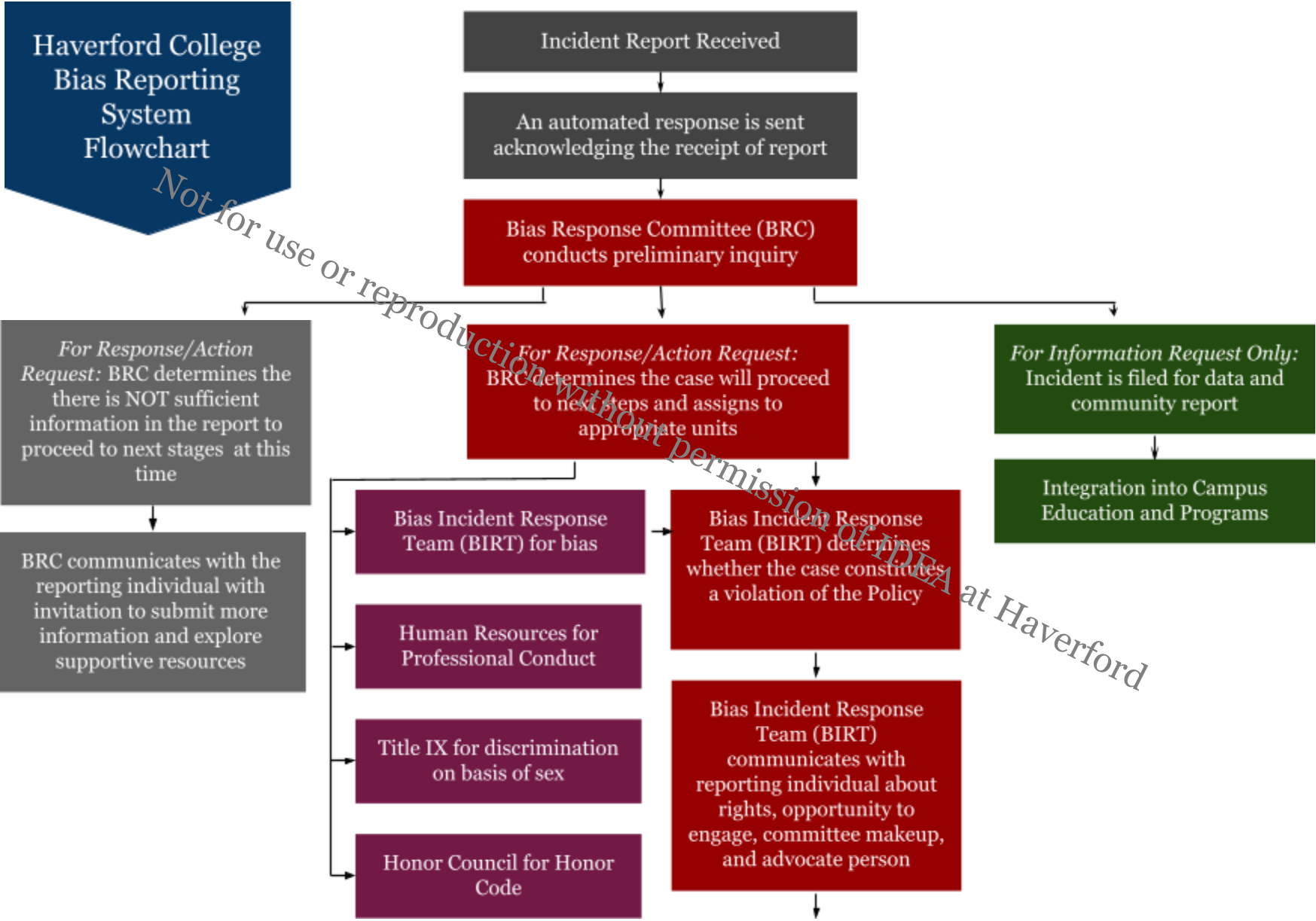
New Review required by Month XX, 2023

*Sponsor: Nikki Young, Vice President for
Institutional Equity and Access*

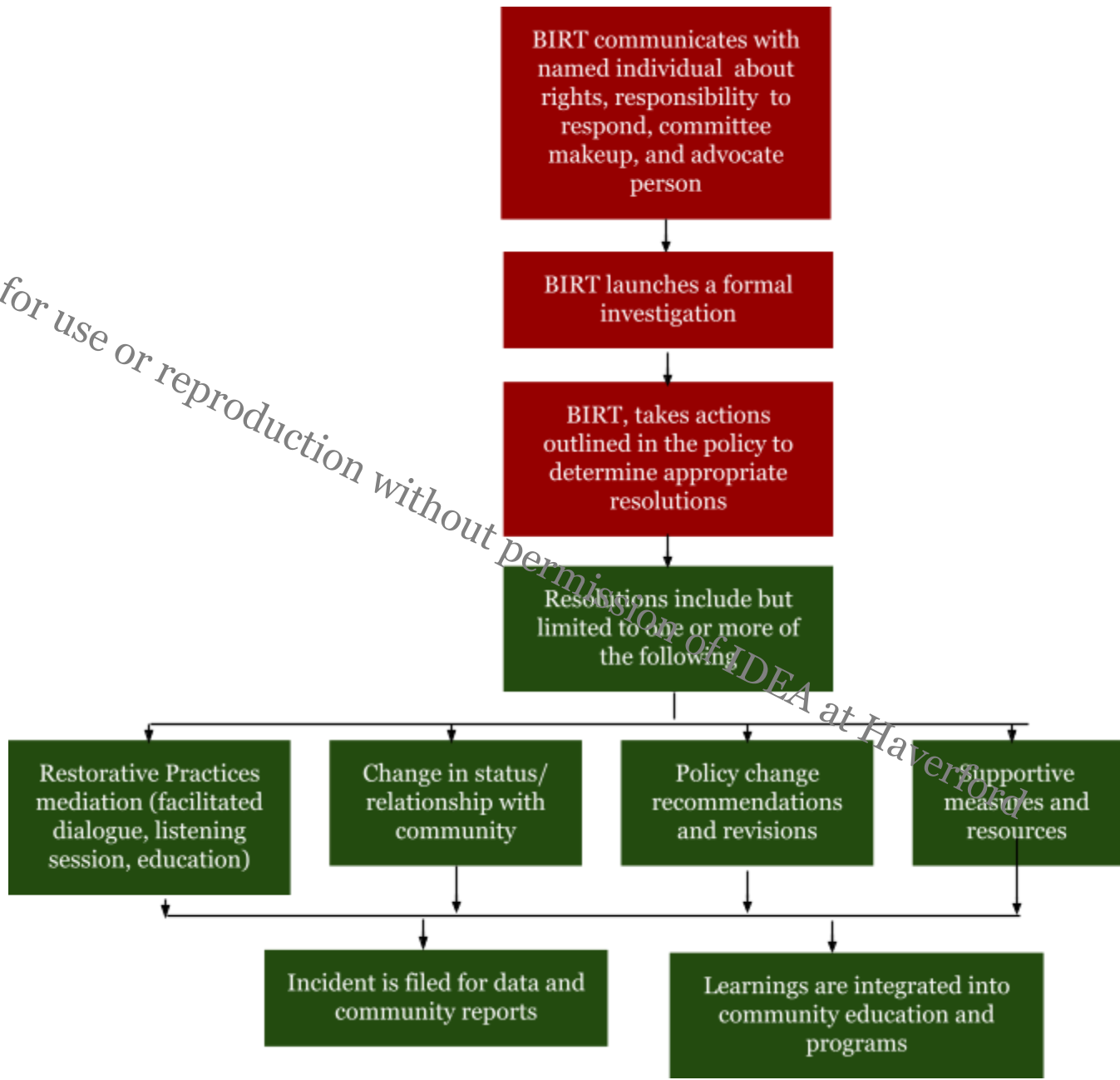
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APPENDIX B
Bias Reporting System & Adjudication Process

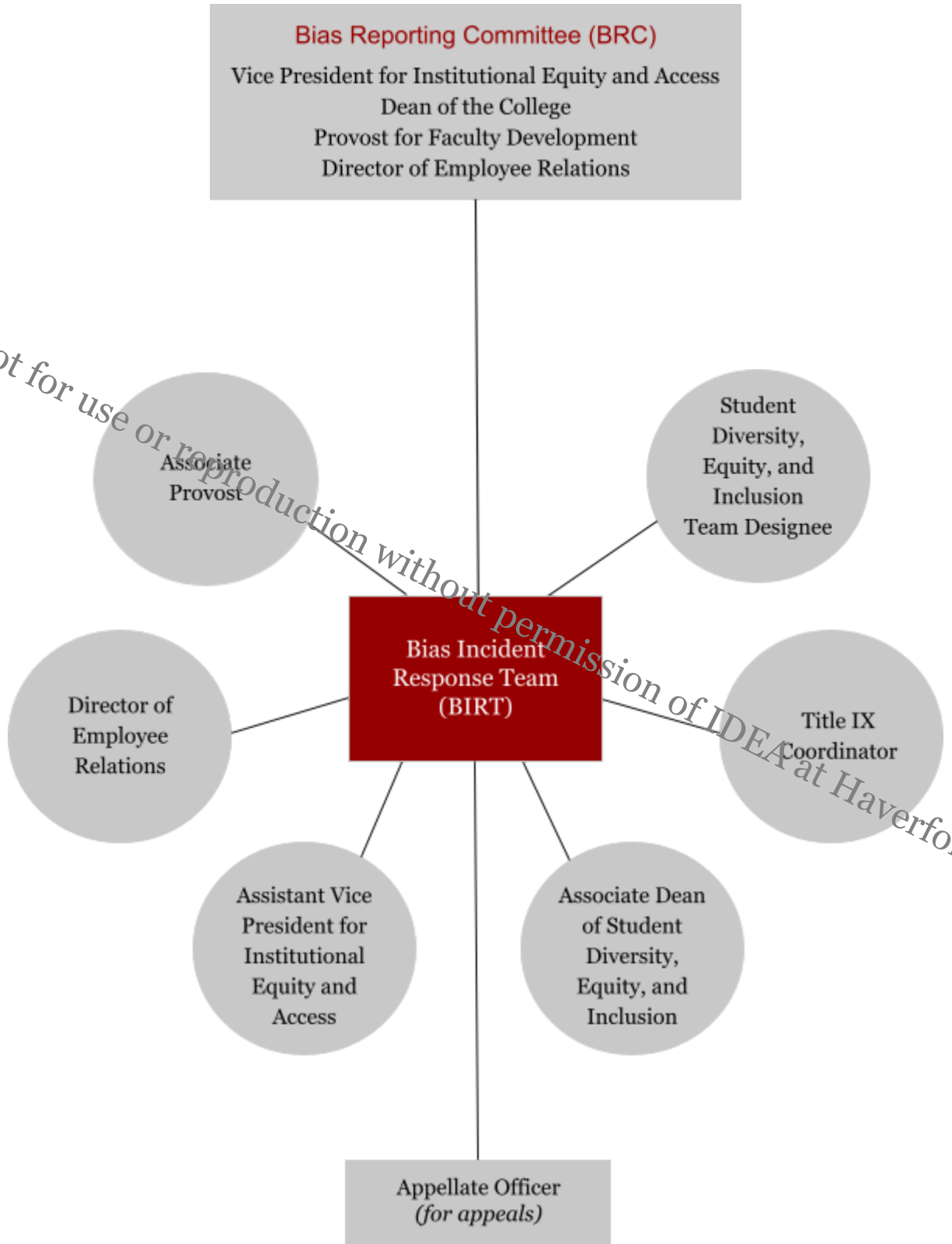


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APPENDIX C

**Composition of Bias Reporting Committee (BRC)
and Bias Incident Reporting Team (BIRT)**



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