

Lower Merion School District

ADMINISTRATIVE REGULATIONS

Policy No.:	101
Section:	PROGRAMS
Title:	EQUITY
Date Adopted:	6/3/22
Date Last Revised:	11/18/24

101R EQUITY

These Administrative Regulations are organized in accordance with the topics set forth in the Policy 101 and are designed to align the practices and procedures with the Board's vision to promote equity throughout the District.

Definitions and Glossary of Other Relevant Terms¹

Achievement gaps shall mean the academic disparities and/or differences between groups of students, as indicated through disproportionalities in academic indicators such as test scores, grade point average and graduation rates. [Source: [National Center for Education Statistics](#)]

Anti-Racism (also Antiracist) as opposed to the relatively passive state of being a nonracist, antiracism refers to a process of explicit action towards eradicating oppressive systems and unequal social practices.

Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities. [Source: [International Holocaust Remembrance Alliance](#)].

Cultural competency shall mean an ability to effectively interact, work, and develop meaningful relationships with people of different cultural backgrounds and demonstrate a willingness to learn from and about other cultures and people of different cultural backgrounds. [Source: [PDE Equity & Inclusion Toolkit - modified](#)]

Cultural proficiency shall mean: (1) the level of knowledge-based skills and understanding that is required to successfully teach and interact with students and to work effectively with colleagues, families and communities from a variety of cultures by understanding and holding all forms of cultural differences in high esteem; (2) a continuing self-assessment of one's values, beliefs and biases grounded in respect toward individuals of other cultures; (3) an ongoing vigilance toward the dynamics of diversity, difference and power; and (4) the expansion of knowledge or cultural practices that recognize cultural bridges as going both ways. [Source: [PDE Equity & Inclusion Toolkit - modified](#)]

¹ Unless otherwise noted, the terms herein are defined in accordance with guidance issued by the Pennsylvania Department of Education: Glossary of Equity, Inclusion and Belonging Terms for Pennsylvania Learning Environments, January 2023 (<https://www.education.pa.gov/Documents/K-12/Safe%20Schools/EquityInclusion/EIB%20Common%20Language.pdf>)

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Cultural responsiveness shall mean infusing understanding of value for individual and groups' cultural differences and preferences into the design, implementation, and evaluation of practices and services.

Equitable resources shall mean funding, programs, policies, initiatives, and supports that, consistent with budgetary limits, target each student's unique background in order to promote every student having access to what they need to access a high-quality education and achieve success in school. [Source: [PDE Equity & Inclusion Toolkit - modified](#)]

Equity shall mean every learner having access to the resources and rigor they need at the right moment in their education across race, gender, ethnicity, language, disability, religion, sexual orientation, gender identity and expression, family background and/or family income.

Equity lens shall mean an intentional focus on assessing any disparate or unequal impact a program, practice, operation, decision or action may have on a student or group of students. [Source: U.S. Department of Education – modified]

Ethnicity refers to a person's identification with a group based on characteristics such as shared history, ancestry, geographic and language origin, and culture.

Explicit bias shall mean conscious attitudes, stereotypes, or overt intentional actions toward members of an identity group merely because of their membership in that group.

Implicit bias shall mean unconscious attitudes and stereotypes and unintentional actions (positive or negative) toward members of a group merely because of their membership in that group.

Inclusion shall mean engagement within a community where the equal worth and inherent dignity of each person is honored. An inclusive community promotes and sustains a sense of belonging.

Institutional or structural barriers or biases shall mean established laws, customs, practices, and systems that systematically reflect and produce group-based inequities. These structures and institutions may be biased regardless of whether individuals within those spaces who maintain those practices have biased intentions.

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Institutional Racism refers to the policies and practices within and across institutions that, intentionally or not, produce outcomes that chronically favor, or put a racial group at a disadvantage. [Source: <https://www.aspeninstitute.org/blog-posts/structural-racism-definition/>]

Intersectionality shall mean a way of looking at the overlap and intersections of people's social group identities (e.g., race, gender, class, gender identity, religion, orientation, disability, etc.) that addresses the related and intersecting systems of bias, discrimination and oppression that impact individuals and groups.

Microaggression means a comment or action that subtly and often unconsciously or unintentionally expresses a prejudiced attitude toward a member of a marginalized group (such as a racial minority).

Opportunity gaps shall mean the disparities in the delivery of educational and extracurricular opportunities, resources, and funding between and among different student groups, leading to different academic, extracurricular, social, and economic outcomes for students. [Source: U.S. Department of Education – modified]

Prejudice means a premature judgment or belief formed about a person, group, or concept before gaining sufficient knowledge or by selectively disregarding facts.

Privilege means unearned social power accorded by the formal and informal institutions of society to all members of a dominant group (for example, white privilege, male privilege, etc.). Privilege is usually invisible to those who have it because we're taught not to see it, but nevertheless it puts them at an advantage over those who do not have it. [Source: [National Association of School Psychologists](#)]

Race refers to the categories into which society places individuals on the basis of physical traits (such as skin color, hair type, facial form and eye shape) regarded as common among people of shared ancestry. Though many believe that race is determined solely by biology, it is now widely accepted that this classification system was created for social and political reasons. There are actually more genetic and biological differences within the racial groups defined by society than between different groups.

Racism means episodic or systematic marginalization and/or oppression of people based upon their perceived race, benefiting white people at the expense of BIPOC ("Black, Indigenous, and People of Color") people.

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Structural Racism means a system in which public policies, institutional practices, cultural representations, and other norms work in various, often reinforcing ways to perpetuate racial group inequity. It identifies dimensions of our history and culture that have allowed privileges associated with “whiteness” and disadvantages associated with “color” to endure and adapt over time. Structural racism is not something that a few people or institutions choose to practice. Instead it has been a feature of the social, economic and political systems in which we all exist. [Source: <https://www.aspeninstitute.org/blog-posts/structural-racism-definition/>]

Student with a Disability (Disability) shall be defined as set forth in LMSD [Policy 114](#).

See also [Policy/AR 259](#) (Transgender & Gender Diverse Students – Ensuring Equity and Nondiscrimination) for additional definitions including, but not limited to, gender expression, gender identity, sex assigned at birth, and sexual orientation.

- 1. The District shall maintain high academic standards and expectations for every student and provide multiple pathways to success in order to support the achievement of every student based on their individual needs.**

The District is committed to students’ robust learning experiences. We believe those experiences should be grounded in high learning standards that are responsive to individual students’ abilities with multiple pathways to successfully demonstrate learning. To ensure this occurs, the District shall provide a curriculum that articulates clear, expected learning objectives/outcomes that are age and course-of-study appropriate while also ensuring flexibility related to how those learning objectives/outcomes are met. Teachers are expected to differentiate instruction based on students’ prior knowledge, background, and previous learning experiences. Learners are expected to be open to new or various ways of learning, as well as multiple methods for demonstrating their learning. Learners are provided opportunities for self-evaluation of what and how they are learning.

To meet these objectives, the following practices and procedures shall continue or shall be established:

- Administering annual benchmark exams to collect and monitor formative data on student achievement;
- Providing relevant, ongoing learning opportunities for staff;

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- Utilizing the [Danielson Framework for Teaching](#) as a guide to observe and evaluate Planning and Preparation, Classroom Environment, Instruction, and Professional Responsibilities for teachers and administrators;
- Conducting regular walkthroughs of classrooms and buildings to assess the implementation of the [Danielson Framework](#);
- Collecting and revisiting student achievement data through district- and building-based data protocols and platforms;
- Maintaining a curriculum cycle for each content area and providing an annual update through the Curriculum Committee of the School Board;
- Conducting a curricular review by teachers and administrators to ensure alignment with Pennsylvania standards as well as representation of diversity in curricular materials and instructional practices.

- 2. The District shall ensure equitable access to academic programs, rigorous coursework options, and athletic, extracurricular, and co-curricular offerings to every student, especially the most historically underserved learners such as students of color, students with disabilities, students with limited English language proficiency, and economically disadvantaged students.**

The District is committed to dismantling historically-existing barriers. The District will consistently use multiple measures to inform decision-making and interrupt reliance on singular traditional data points, such as end-of-year grades or test scores, to determine access to courses, programs, and services. Systems for universal screening and practices grounded in universal design for learning will be implemented and sustained. Educators are expected to utilize culturally-responsive instructional methods.

The District will work to ensure that course barriers (i.e. prerequisites) that prevent students from participation in higher-level courses are eliminated where possible. The following steps shall be taken to accomplish this objective:

- Creating and maintaining systems for universal screening and practices;
- Preparing and delivering robust and transformative learning experiences for staff that includes, but not is not limited to, social emotional learning, culturally responsive practices/instruction, and implicit bias training;
- Maintaining updated and easily accessible course catalogs, which includes a regular review of course descriptions;
- Continuing to implement the current mathematics course sequence that provides all students access to courses that are prerequisites to higher-level courses;

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- Maintaining collaborative efforts to consult with community and other partners to prepare all students for participation and sustainability in higher-level courses;
- Providing opportunities for students to access coursework in ways personalized to meet their needs, interests, and abilities while avoiding systems that perpetuate disproportionality;
- Providing relevant, ongoing learning opportunities for staff;
- Using a variety of communication opportunities to ensure that all students, parents, and guardians are aware of the District's offerings; and
- Promoting teacher, counselor, and administrator collaboration to identify and support students who qualify but do not elect to participation in higher-level course.

3. The District shall provide resources, materials, and assessments that reflect the diversity of the District's students and that are geared toward the understanding and appreciation of individual cultural uniqueness and differences.

The District will provide instructional resources that reflect individual identity and institutional diversity. The vetting of materials includes explicit considerations of identity and diversity throughout the process from needs determination, to investigation of resource options, to piloting materials and/or strategies, to professional learning, and to ensuring students' long-term learning needs are met. Questions, such as those that follow, will be considered when course resources and instructional materials are considered, determined, and/or re-evaluated:

- What does the resource present as normal or neutral? What does the resource include in terms of diversity when presenting "normal" or "neutral?"
- Who is depicted/represented in a text and how? To what degree is the representation positive? How well does the author and/or publisher know the group represented?
- How will the resource be utilized?
- What objections or contrary positions exist related to this resource? How have we ensured that we listened to and sought out possible objections or contrary positions in order to make the best decisions possible?
- Does the material enhance the depth and breadth of students' understanding of themselves and the world?
- Does the resource or instructional plan have the potential to place a learner in a position where they are expected or required to take a position that may make others feel diminished?

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The foregoing questions are intended to be applied to a variety of subject areas and to historical and contemporary resources. They are intended to provide teachers an opportunity to reflect on instructional experiences in advance of their presentation to learners. Additionally, the Administration, through the Curriculum and Instruction Department, shall develop and/or refine such inquiries and to continue to ensure that resources are vetted accordingly.

- 4. The District shall ensure the promotion and maintenance of welcoming and inclusive school environments. In service of creating such an environment, school-based discipline shall be equitably administered based on a model of restorative practices rather than punitive measures, when appropriate.**

A. Establishing Welcoming and Inclusive Communities

All members of the LMSD community – educators, students, administrators, support professionals, parents/guardians – have a responsibility to contribute to a welcoming and inclusive school environment and culture. This environment includes on-going, embedded positive reinforcement when community expectations are upheld, embracing an approach that is warm yet demanding. Norms and expectations for members of LMSD community, which are developed with input from students, are reviewed regularly.

The District supports a restorative approach, which is based upon the proactive creation of positive relationships and commits to provide tools and resources for learners and staff to engage in restorative practices. Members of the LMSD community are responsible for caring for and connecting with all students. Schools develop safe spaces for students in affinity groups that address the diversity of the student population. While students are important contributors to their school's environment and climate, adults are ultimately accountable for creating and sustaining a community where all students feel that they always belong.

The District will systematically review data points regarding these efforts, including but not limited to, reviewing student climate surveys, staff climate surveys, affinity group participation, student attendance, student discipline data, and focus group feedback.

With an awareness of restorative practices as a matter of culture and not a replacement for consequences, the District must continue to ensure a process to redress wrongs that contribute to diminishing a welcoming and inclusive school environment. This process shall include:

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- A clear, publicized, anonymized, and accessible complaint/concern reporting system that is available to students, staff, and families;
- Investigatory protocols consistently followed and communication of outcomes in compliance with Family Educational Rights and Privacy Act (FERPA) and any other laws/rules governing privacy and confidentiality; and,
- Consequences for behavior that violates and/or disrupts welcoming and inclusive schools

Such a process may be connected to existing protocols and practices but must be explicitly connected to this Policy/AR.

B. Equitable Administration of Consequences

The equitable administration of school-based discipline focused on restorative practices rather than punitive measures, when appropriate, is a key component of the District's equity work. To achieve this goal, the District has done, and will continue to support, the following:

- Ongoing review of Board Policy and procedures related to school-based discipline to ensure alignment with the District's equity goals;
- Implementation of alternatives to exclusionary discipline, when appropriate;
- Utilization of school-based and District-wide discipline data to proactively address behavioral challenges and to ensure areas of disproportionate discipline are examined and rectified as appropriate;
- Implementation of professional development on the appropriate utilization of restorative practices;
- And, coordination between and with district administrators, school building officials, and school safety officers to ensure the consistent application of safety-related policies and procedures.

- 5. The District shall meaningfully engage and empower students, their families, and members of the Lower Merion and Narberth communities to be partners in the District's efforts to provide an equitable experience for every student. This shall include, among other methods, periodically soliciting feedback from: (1) a cross-section of District students regarding their experiences, sense of inclusion, and how their needs are being met; and (2) other members of the Lower Merion and Narberth communities.**

Educators, staff, students, families, and members of the community will be surveyed when/if/as questions or issues for consideration arise. All efforts will be made to ensure that any surveys are brief and focused. Survey responses will be gathered, considered,

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summarized, and shared to the Board as well as the larger community (educators, students, families). Summaries and public sharing will be action-oriented to the degree possible.

With respect to survey development, the District shall:

- Provide versions of the survey in multiple languages.
- Ensure, to the greatest extent possible, that the survey is available in forms that are accessible to the recipients, including, but not limited to, paper copies, electronic and mobile text format.
- Consider how much time is needed to maximize participation and ensure that various modes of survey delivery (point above) can be accomplished.

In addition to surveys, the District will continue to utilize other methods of outreach and information gathering from all stakeholders. Such strategies include, but are not limited to, community meetings, CARE, focus groups, interviews, and student forums.

6. The District shall recruit, employing, supporting, and retaining a workforce that is culturally responsive and reflective of the diversity of the Lower Merion and Narberth communities.

The District is committing to recruiting, employing, supporting, and retaining a workforce that is culturally responsive and diverse.

Recruitment

- Attending diversity career fairs (e.g., DVCEE Annual Educators of Color Recruitment Fair, MCIU Diversity Job Fair);
- Working with organizations that support diversity in education (and leveraging relationship that may have value in recruitment efforts);
- Increasing communication and sharing employment opportunities with local colleges including historically black colleges and universities (HBCU's);
- Exploring partnership opportunities with universities and colleges with "grown your own" programs for students and staff, offering opportunities including, but not limited to, dual enrollment and/or aspiring leadership; and,
- Continuing to assess and utilize social media tools for recruitment efforts

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Hiring

- Reviewing candidates to ensure commitment to concepts of Board [Policy 101](#) (Equity);
- Constantly reviewing hiring processes and procedures to ensure alignment with concepts of Board [Policy 101](#) (Equity);
- Cultural proficiency and understanding of equity are two of the dimensions of proficiency that we will assess of all candidates;
- Other hiring practices include:
 - Ensuring equity and cultural proficiency questions are embedded in interview process for all positions;
 - Making a concerted effort to diversify hiring panels; and,
 - Calibrating interview teams to ask and assess cultural proficiency questions.
- Ensuring that new staff induction programs include sessions on cultural proficiency and equity.

Retention

- Sponsoring staff affinity groups as well as meet and greets during the school year to support teachers of color;
- Identifying access points to leadership and promotional opportunities;
- Creating space for honest conversation informed by data gathered from surveys and shared with the community, seeking input where appropriate;
- Maintaining rich formal professional learning opportunities as well as access to informal professional dialogue;
- Establishing a formal mentorship program for new teachers of color; and,
- Implementing and reviewing survey data for all exiting employees (who opt to participate).

- 7. The District shall provide meaningful professional development for District employees, Board members, and, where possible, independent contractors, to strengthen their knowledge and skills in areas such as cultural proficiency, equity, inclusion, implicit and explicit bias awareness, and social justice. Such professional development sessions should offer opportunities for self-reflection and the receipt of feedback on how to improve upon carrying out the Board's equity statement and supporting the success of every student.**

Annually, the District will provide professional learning opportunities and guidance to all staff members related to the Equity Policy and Administrative Regulations. Any employee hired after this initial District-wide learning will receive training and support during their formal on-boarding to the District.

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Professional learning is a valuable and on-going part of every LMSD employees' experiences within the District. Professional learning opportunities will be developed and vetted through a lens of equity, diversity, and inclusivity. This review will feature questions, developed through input and insight from professionals, that will be considered when professional learning opportunities are considered, determined, and/or re-evaluated.

The District will create systems to differentiate learning opportunities for staff. Growth will be measured using self-reflection tools and focused feedback/discussion frameworks developed with input from staff, students, and families.

Student surveys and focus groups will be used as one way to measure that these efforts are reaching students and that they are benefitting from it.

- 8. The District shall engage in ongoing review, evaluation, and modification of policies and practices that perpetuate inequitable outcomes for students based on an annual review of District qualitative and quantitative data. Such review and evaluation includes periodic reporting to the Board and community stakeholders on the success of the District's equity initiatives, progress towards achieving the goals of this Policy, and emerging needs.**

The Superintendent will develop specific annual reporting goals that look at focal areas related to the equity and inclusivity administrative regulations one through eight articulated above. The District will use surveys and other data to closely study and publicly report on the specific annual goals in a way that both (1) provides accountability to and for the work and (2) supports reflective, recursive, and interrogative processes that analyze past data and practices in service of future initiatives.

The District is also committed to creating a welcoming and supportive culture centering on equity as a foundation upon which all decisions are made. This will be achieved by District employees – administrators, teachers, staff – being expected to embed reflective questions in their day-to-day work as individuals and as department members. As an example, these are questions that would be an expected part of reflective practice:

- Who does a particular practice impact? How?
- Are there disparate impacts for historically underrepresented groups? How are these impacts felt?
- What is implied, invisible, or assumed? Whose perspective or understanding is explicitly or implicitly privileged/made central?
- To what degree have a variety of perspectives, including stakeholders who are also members of the communities affected by this practice, been considered?

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- What are the barriers to more equitable outcomes (e.g., mandated, political, emotional, financial, programmatic, or managerial)?
- How will you (a) mitigate the negative impacts and (b) address barriers identified above?

Discussion of engagement in and reflective practice about equity, inclusivity, and belonging may be a part of employee evaluation conferences or conversations.