



POLICY REVIEW WITH AN EQUITY LENS

 FITCHBURG STATE
UNIVERSITY
LEADING FOR CHANGE

WELCOME / INTRODUCTION

Welcome to the Equity Policy Review Resource Guide. We thank you for taking on this important work. Racism and discrimination is often systemic, intentional or not. If we as a university want to sustain real change, we must take the time and energy to review our policies and procedures, looking for intentional or unintentional bias towards minoritized populations.

This work is not easy and it is ongoing. This guide has been designed to assist you and your departments through this process. We recommend starting small, reviewing one policy. As you get more comfortable with the work, increase the scope. Perhaps start with a deficit-minded language review. This is a tangible action item that will help you focus on this work.

The Leading for Change Policy Audit with a DEI Lens committee is here to assist.

Policy Audit with DEI Lens Committee

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Defining Equity Review in the Scope of Fitchburg State

Educators with an equity talk and an equity walk critically examine institutional policies, practices, and structures through a lens that questions why inequalities exist to change the educational environment to support the success of students-especially students who have been historically and continuously marginalized in our educational systems. (Bensimon, etal. p. 2).

Equity prioritizes the creation of opportunities for minoritized students to have equal outcomes and participation in education programs that can close the achievement gaps in student success and completion. (Bensimon, etal. p. 7).

Historically marginalized populations include, but are not limited to, race, ethnicity, LGBTQ+, Ableism, Religion, Single Parent, Veterans, Ageism.

This resource guide is designed to assist your review of policies with a focus on ALL marginalized populations.

Reference

Bensimon, E.S., McNair, T.B., and Malcom-Piqueux, L. 2020. From Equity Talk to Equity Walk: Expanding practitioner knowledge for racial justice in Higher Education. Jossey-Bass, Hoboken, NJ.

GUIDANCE TO THIS WORK

Know who your students are and will be.

- Commit to frank, hard dialogues about the climate for minoritized students on your campus, with the goal of affecting a paradigm shift in language and actions.
- Invest in culturally responsive practices that lead to the success of minoritized students.
- Set and monitor equity goals and devote aligned resources to achieve them.
- Develop and actively pursue a clear vision and goals for achieving high-quality learning.
- Expect and prepare all students to produce culminating or signature work.
- Provide support to help students develop guided plans to achieve essential learning outcomes, prepare for a complete signature work, and connect college with careers.
- Identify high-impact practices best suited to your students and your institution's quality framework.
- Ensure that essential learning outcomes are addressed and high-impact practices are incorporated across all programs.
- Make student achievement—specifically, minoritized student achievement visible and valued (Bensimon, et al. p. 13).

Questions to Ask

- What does equity mean?
- Equity for whom?
- What does it entail in thought and action?
- What does it mean to perform equity as a routine practice in higher education?
- What makes individuals equity-minded? (Bensimon, et al. p. 20).

Leading for Change Racial Equity & Justice Institute Practitioner Handbook

https://www.bridgew.edu/sites/bridgew/files/media/pdf_document/2021_Racial_Equity_Justice_Institute_Handbook.pdf

Protocol for Assessing Equity-Mindedness in State Policy

<https://drive.google.com/drive/u/0/folders/1wSVK5HJufc5KhUZGHGaQP-ATBbou7DGc>

General Recommendations

When possible invite an external person to lead the process to reduce bias

- Consultant
- Someone from a different department/division

Build a team of folks that includes members of the department and external to the department

- Staff
- Faculty
- Students
- Take notes

Create a spreadsheet that includes current policy, recommended changes, and justification

DEFICIT MINDED LANGUAGE

Deficit Minded

When you view students as lacking the essential skills and attributes they associate with academic success, motivation, self-efficacy, individual effort, and academic integration (Bensimon, etal. p. 46).

Policies, procedures

Pamphlets, brochures, websites, communication in general, etc.

Code words for deficit-mindedness

- Students are underprepared
- Their parents expect them to work
- They don't know how to be students
- They don't know how to study for a test
- They read the book, but they don't understand it
- They lack self-regulation skills
- They got by in high school and don't realize college is different
- They have no idea what it is to be a college student
- They may say they aspire to transfer but have no understanding of what that entails
- Their language arts skills are lacking
- They do not know how to read or take notes

Code words to look for

- Underprepared
- Underrepresented
- Minority
- Avoid words/statements of Universalism
- Achievement Gap
- Disadvantaged
- Unprivileged
- Underperforming
- At Risk
- First Generation

Words to use

- Minoritized
- Educational Gap

Binary Assumptive Language

<https://lgbtq.umd.edu/good-practices-inclusive-language>

These are examples of expressions that assume there are only two genders (a binary system of gender), expressions we recommend to avoid as a universal to refer to people generally -- but they might be appropriate if referring to a specific person and you know how that person wants to be referred to.

- Ladies and gentlemen
- Boys and girls
- Men and women of the faculty
- Brothers and sisters
- He or she
- S/he
- Sir/madam

Gender Inclusive Alternatives

<https://lgbtq.umd.edu/good-practices-inclusive-language>

These are alternatives to use instead of language assuming a gender binary. The exact language that should be used in a specific situation depends on context and judgment. (For example, in a formal situation, instead of saying "thank you, sir" to someone you don't really know, you might simply say "thank you very much.")

- Esteemed guests
- That person
- Friends and colleagues
- Students
- Siblings
- Everyone
- The participant
- Faculty members
- Faculty of all genders

Terms to Avoid and Replacement Language

<https://lgbtq.umd.edu/good-practices-inclusive-language>

The following terms are generally outdated, and some of them might be offensive because they could imply criminalization or pathologization or they could simply be misnomers. The following are examples of better go-to language, though sometimes the terms replaced might still be appropriate in certain situations or contexts. Good judgment is always critical.

Say	Instead of
trans or transgender	transsexual
gender affirmation transition care change of gender marker	sex change sex reassignment
cisgender man/woman non-transgender man/ woman	biological man/woman
she/her pronouns or he/him pronouns	feminine/female pronouns masculine/male pronouns
personal pronouns	preferred gender pronouns
cross dresser	transvestite
intersex	hermaphrodite
gay or lesbian	homosexual
orientation or identity	lifestyle or preference

Tracking and Archiving Deficit Minded Language

Document/Policies Reviewed	Deficit Language Identified	Language Edits
Reference document/ resource/policy being reviewed along with location		

How to avoid using Ableist Language

<http://deareverybody.hollandbloorview.ca/wp-content/uploads/2018/08/DearEverybodyTipsonAbleistLanguage2018-19.pdf>

People First Language

Say	Instead of
She has a disability/children with disabilities	Disabled child/children, the disabled/ handicapped/ crippled/deformed
He has a cognitive disability	He is mentally disabled/retarded
He has Down syndrome	He's Down's/a mongoloid
She has quadriplegia	She's quadriplegic
She has a mental health condition/mental illness	She is mentally ill/disturbed/retarded
He uses a wheelchair/mobility device/communications device	He is confined to a wheelchair is wheelchair bound/ can't speak
She receives special education services	She's in special ed
He has a developmental delay/ physical and developmental disability	He is developmentally delayed
Children without disabilities/ typically developing child	Normal kids
Does not move or speak/is non-verbal/ communicates with eyes, devices, etc...	Mute/can't speak
He has a hearing impairment/is deaf	He is mute
Has a congenital disability/ born without a limb	Birth defect/limbless/crippled Brain injury Brain damaged
She needs...she uses...	She has problems with...
Accessible parking	Handicapped parking

Language (from Rubric)

How does the policy's language demonstrate a commitment to DEI principles?

The checklists below are designed to help you identify aspects of your policy which support DEI, as well areas for improvement. They aren't intended to be comprehensive, and not every question will be relevant to every policy.

Language, history & purpose

- Does the policy contain language that "adequately informs stakeholders about the rationale, purpose and scope of its application" (Great Lakes)
- As it was created, was the policy's language vetted with multiple constituencies, to ensure comprehension?

Language, impact and outcomes

- Are specific groups who might be impacted by the policy specifically named?
- Are specific DEI outcomes named as goals of the policy?
- Are stakeholders broadly defined as anyone impacted by the policy?
- Do a variety of stakeholders have input into how the success of the policy is defined?

Language, access & opportunity

- Does the policy title incorporate "language that could help with preventing barriers with understanding or interpreting its meaning from a variety of intended audiences." (UNM equity lens)
- Does the policy contain clear language, and specific examples, of what it would mean to violate the policy? (Great Lakes)
- "What types of words are used to describe the beneficiaries of the policy? Are they words that include or exclude students from communities that have been historically marginalized by higher education?" (CAS)
- Do references to marginalization or underrepresentation specifically include less-frequently referenced identity categories, such as ability and language?
- Does your policy use inclusive language?
- Does the policy use person-centered language?
- Has the policy been disseminated and publicized in a variety of ways, ensuring that everyone affected by it has seen it?
- Has accessibility for visually and hearing impaired audiences been considered in materials which publicize the policy?

Language & data

- Does any data reporting avoid jargon, undefined acronyms, and other specialized language? (Resource: The US government's checklist for plain language.)
- Has accessibility for visually and hearing impaired audiences been considered in your data reporting?

Access, Equity, Diversity, Inclusion

POLICY REVIEW RUBRIC

Purpose & Structure of Rubric

This rubric is designed with two purposes: as a tool to support externally conducted diversity, equity & inclusion (DEI) policy review, and as a resource to support internal review. We understand that reviewing policies would be ideally done by people external to the department under review. However, we have also aimed to create a rubric useful for internal review, regardless of the reviewers' knowledge of assessment or DEI principles.

The rubric is broken into six categories: history/ purpose, impact/ outcomes, access/ opportunity, data, resource allocation, and language. Each section begins with an open-ended short answer question, followed by several subsections of clarifying yes/no questions.

The purpose of the subsequent clarifying questions is not to provide a 'score' (as that would require us to identify which yes/no questions most effectively demonstrate alignment with DEI principles). Instead, they enable reviewers to address the short answer questions in a meaningfully consistent way, regardless of the background knowledge of the reviewer.

Here's a quick clarifying example: a good faith reviewer who hasn't previously considered DEI concepts could conceivably answer "yes" to a question like, "Does the policy's language show a commitment to DEI principles?" because of (for instance) the absence of overtly stereotypical language. Such a response would be honestly intended, but wouldn't provide relevant information. On the other hand, the presence of clarifying questions such as, "Has the policy's language been looked over by multiple groups to ensure comprehension?" and, "Does the policy name a specific example of what it means to violate the policy?" will help any reviewer see what concrete considerations might be considered relevant when answering the rubric's questions.

1. History and Purpose

The origin and purpose of the policy.

Origin

- The policy was developed in response to an identified need within the population it is intended to serve.
- The policy was developed in response to aiding the overall mission of the University.

Creating

- The policy was created with the input of multiple constituents.
- The policy was created with the intention of amendment for future populations.

Goals

- The goal(s) of the policy reflect an equity focused outcome for historically marginalized populations.
- The goal(s) of the policy are in alignment with the mission of the University.

Accountability

- Multiple stakeholders are held accountable for the policy:
 - Students
 - Faculty
 - Staff
 - Administration

2. Impact and Outcomes

Intended impacts and outcomes of the policy.

Measurable

- There clear and defined measures associated with the policy that might better support equitable outcomes for historically marginalized groups? (CAS)
- Performance priorities associated with the policy reflect equity for historically marginalized groups.
- An equity lens is applied to tracking policy outcomes for groups the policy is intended to serve.

Accountability

- There are equity focused benchmarks and/or key performance indicators when assessing outcomes of this policy.
- Relevant mechanisms are in place to ensure accountability for goals and measure of the policy.

3. Access & Opportunity

What identified groups/student populations are intended to benefit from this policy:

Overt inclusion/Overt exclusion

- Are there specifically identified historically marginalized groups included in accessing the benefits of this policy?
- Are there specifically identified historically marginalized groups excluded from accessing the benefits of this policy?

Stakeholders

- Were potentially impacted stakeholders identified and represented in the process of developing this policy?
- Is there intent to seek input from impacted stakeholders when reflecting on/redesigning this policy?

Eligibility

- Does eligibility for this policy reflect the population it intends to serve?

4. Data

What strategies are in place to ensure that DEI principles have been incorporated into any plans for data implementation, collection, analysis, and reporting?

The checklists below are designed to help you identify aspects of your policy which support DEI, as well areas for improvement. They aren't intended to be comprehensive, and not every question will be relevant to every policy.

Use of pre-existing data

- Does the policy take into account existing data about the impacts of similar policies?

Data Collection

- "Is data collected and reported by marginalized groups?" (CAS)
- Have various audiences, including groups affected by the policy, been included in decisions about what data will be collected?
- Will qualitative data about stakeholders' perceptions of the policy be collected, in addition to any quantitative data about impacts?
- Have steps been taken to ensure any survey respondents, focus groups, etc., feel comfortable sharing negative impressions of the policy?
- Is there any mechanism for anonymous feedback on the policy?
- Have survey respondents, focus groups, etc., received meaningful assurance that their feedback will have a significant impact on the policy?
- Has data been collected on whether any participation restrictions (i.e., GPA restrictions) disproportionately affect any specific groups?

Data Analysis

- Is there a plan to analyze the policy's effects on longer-term measures of DEI outcomes (i.e., engagement, retention, recruitment, whatever's relevant)?
- Have multiple perspectives been brought to analyzing the data?
- Have historical and community contexts been considered in analysis (e.g., are outcomes affected by prior policies, or by beliefs or feelings about the policy)?

Data Disaggregation

- "Is disaggregation practiced across different reporting mechanisms and incorporated consistently into policy evaluation, accountability, institutional reporting, etc.?" (CAS)
- Has data also been disaggregated intersectionally (e.g., in addition to disaggregating by race, and gender, also disaggregated by race+gender)? (AISP)

Data reporting

- Will any data analysis be released to all relevant stakeholders, including students, staff, and the larger community?
- Have stakeholders been informed how data will be used?
- Will outcomes be posted publicly?
- What care has been given to de-identification and anonymization of any reporting? (IJPDS article)

5. Resource Allocation

Specify what dollar amount/percentage of budget is allocated to this policy.

Resource Identification

- Has the source of funding been identified (permanent, grants, etc.)?
- Does the policy have access to needed resources to do the work?

Staff Designations

- Are staffing levels adequate to implement and manage the policy effectively?
- Have employees been properly trained to support the policy goals?
- Externalizing Policy
- Can the policy be easily located and referenced?
- Is the policy accessible and understood by the greater community?

6. Language

How does the policy’s language demonstrate a commitment to DEI principles?

The checklists below are designed to help you identify aspects of your policy which support DEI, as well areas for improvement. They aren’t intended to be comprehensive, and not every question will be relevant to every policy.

Language, history & purpose

- Does the policy contain language that “adequately informs stakeholders about the rationale, purpose and scope of its application” (Great Lakes)
- As it was created, was the policy’s language vetted with multiple constituencies, to ensure comprehension?

Language, impact and outcomes

- Are specific groups who might be impacted by the policy specifically named?
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Language, access & opportunity

- Does the policy title incorporate “language that could help with preventing barriers with understanding or interpreting its meaning from a variety of intended audiences.” (UNM equity lens)
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- “What types of words are used to describe the beneficiaries of the policy? Are they words that include or exclude students from communities that have been historically marginalized by higher education?” (CAS)
- Do references to marginalization or underrepresentation specifically include less-frequently referenced identity categories, such as ability and language?
- Does your policy use inclusive language?
- Does the policy use person-centered language?
- Has the policy been disseminated and publicized in a variety of ways, ensuring that everyone affected by it has seen it?
- Has accessibility for visually and hearing impaired audiences been considered in materials which publicize the policy?

Language & data

- Does any data reporting avoid jargon, undefined acronyms, and other specialized language? (Resource: The US government’s checklist for plain language.)
- Has accessibility for visually and hearing impaired audiences been considered in your data reporting?

Electronic Rubric Form
is found here

<https://forms.gle/eA4yeGBcEMBArqt9>



TRACKING AND ARCHIVING POLICY CHANGES

Policy & Procedures	Deficiency Identified in Rubric	Edits & Justifications
History and Purpose		
Impacts & Outcomes		
Access & Opportunity		
Data		
Resource Allocation		
Language		

APPENDIX A—ADDITIONAL RESOURCES

Equity & Policy review in Education, Higher Education, Public Sphere

Minnesota State Office of Equity & Inclusion:

<https://www.minnstate.edu/system/equity/docs/Equity-Lens-to-Policy-Review1.pdf>

Monroe, WA, school district Racial Equity Policy Review Worksheet:

[https://www.monroe.wednet.edu/uploaded/COVID-19/PSESD_RET_PolicyReviewWorksheet_\(1\).pdf](https://www.monroe.wednet.edu/uploaded/COVID-19/PSESD_RET_PolicyReviewWorksheet_(1).pdf)

University of Minnesota Equity Lens Policy Review:

<https://policy.umn.edu/resources/equity-lens>

Applying an Equity Lens to Policy Development:

https://www.ucop.edu/ethics-compliance-audit-services/_files/2019_symposium_presentations/bk1-2-policy.pdf

Great Lakes Equity Center Policy Equity Analysis Tool:

<https://greatlakesequity.org/resource/policy-equity-analysis-tool>

UPenn Toolkit for Centering Racial Equity Throughout Data Integration:

<https://www.aisp.upenn.edu/centering-equity/>

Urban Institute Guide for Racial Equity in the Research Process:

https://research.iu.edu/campaigns/nordp-retreat/urban_institute_guide_for_racial_equity_in_research_process_0.pdf

Mass Dept Ed: Racial Equity Principles Guiding Equity Agenda:

<https://www.mass.edu/strategic/equity.asp#principles>

Lane CC - Equity Lens, Guiding Questions:

<https://www.lanec.edu/diversity/lanes-equity-lens-guiding-questions>

Salary/ hiring equity review is a substantial component of policy equity review

UC Berkeley - Advancing Racial Equity and Transforming Government - equity tools on p. 27-28:

https://haasinstitute.berkeley.edu/sites/default/files/gare-resource_guide.pdf

CPS Planning for Equity Policy Guide:

<https://equity.cps.edu/tools/planning-for-equity-policy-guide>

Equity & Admissions Policies

Community Equity Audits:

<https://hackthegates.org/wp-content/uploads/2020/08/Thornhill-CommunicationEquityAudits-HTGreport.pdf>

Equity & Student Life Policies:

https://studentlife.umich.edu/files/sa/student_life_dei_strategic_plan_year_5_.pdf

Substance Abuse:

<https://www.colorado.edu/today/2019/03/06/student-affairs-responding-student-substance-abuse>

Assessment of Current UC Equity & Inclusion Practices, pgs. 30-38:

https://www.ucop.edu/human-resources/coro/2017_forms/2016-CORO-Projects-Northern-California-Final-Report.pdf

Pacific University - Best Practices for Equity, Diversity & Inclusion in Marketing Policy:

<https://www.pacificu.edu/about/directory/university-advancement/marketing-communications/best-practices-edi-marketing>

Dancing on Live Embers by Tina Lopes (checklists)

APPENDIX A—(cont.)

Racial Equity Impact Assessment from Race Forward:

<https://www.raceforward.org/practice/tools/racial-equity-impact-assessment-toolkit>

Is everyone really equal? 2nd edition by Ozlem Sensoy & Robin DiAngelo

“DEI for Beginners” Learning for Justice

<https://www.learningforjustice.org/learning-plan/dei-for-beginners>

Good Practice for Inclusive Language

<https://lgbtq.umd.edu/good-practices-inclusive-language>

How to Avoid using Ableist Language

<http://deareverybody.hollandbloorview.ca/wp-content/uploads/2018/08/DearEverybodyTipsonAbleistLanguage2018-19.pdf>

Measuring Equity

Equity Scorecard

<https://cue.usc.edu/tools/the-equity-scorecard/>

Equitable Performance Metrics

<https://equityinthecenter.org/equitable-performance-metrics-any-organization-can-measure-now/>

The Racial Equity Toolkit

https://www.governor.wa.gov/sites/default/files/documents/PRWG_RacialEquityToolkit_Worksheet_12-20-2018.pdf

Race Equity Assessment Tool

<https://cssp.org/wp-content/uploads/2018/08/Race-Equity-Impact-Assessment-Tool.pdf>

Systemic Equity Review Framework

<https://www.edc.org/sites/default/files/uploads/Systemic%20Equity%20Review%20Framework.pdf>

Developing an Equity Scorecard

https://s3.goeshow.com/dream/DataSummit/Data%20Summit%202018/equity_scorecard_final_original_1536254348.pdf

Policy Equity Analysis Tool

<https://drive.google.com/file/d/10-vXx-f7ywwXuoFDfrUsalejP4xZ8A4o/view?usp=sharing>

APPENDIX B—CAS STANDARDS

Guiding Principle:

Advocating for Diverse, Equitable, and Inclusive Communities

PART 5. ACCESS, EQUITY, DIVERSITY, AND INCLUSION

CAS Standard		Current Policy/Procedures or Practice	Recommended for Improvement
5.1 Inclusive and Equitable Educational and Work Environments			
5.1.1	Within the context of each institution’s mission and in accordance with institutional policies and applicable codes and laws, the functional area must create and maintain educational and work environments for students, faculty, staff, administrators, designated clients, and other constituents that are welcoming, accessible, inclusive, equitable, and free from bias or harassment.		
5.1.2	The functional area must not discriminate on the basis of race; color; national origin; sex; disability; age; cultural identity; ethnicity; nationality; citizenship; family educational history (e.g., first generation to attend college); political affiliation; religious affiliation; sexual orientation; gender identity and expression; marital, family, social, economic, place of residence, or veteran status; or any other basis included in codes, laws, and institutional policies.		
5.2 Organizational Aspects of Access, Equity, Diversity, and Inclusion			
5.2.1	The functional area must provide equitable access to facilities and resources for all constituents.		
5.2.2	The functional must respond to the needs of all constituents when establishing hours of operation and developing methods for delivering programs, services, and resources.		
5.2.3	The functional area must identify and address actions, policies, and structures within its operation that perpetuate systems of privilege and oppression.		
5.2.4	The functional area must prohibit profiling based on a person’s actual or perceived identity or status.		
5.3 Advocating for Access, Equity, Diversity, and Inclusion			
5.3.1	The functional area must advocate for accessible facilities and resources, and address issues that impede access.		
5.3.2	The functional area must advocate for inclusion, multiculturalism, and social justice within the institution.		
5.3.3	The functional area must enact culturally responsive, inclusive, respectful, and equitable practices in the provision of services.		
5.3.4	The functional area must develop plans for ongoing professional development on cultural competence and workplace inclusion.		
5.4 Implementing Access, Equity, Diversity, and Inclusion			
5.4.1	The functional area must establish goals for access, equity, diversity, and inclusion.		
5.4.2	The functional area must address the characteristics and needs of diverse constituents when establishing and implementing culturally relevant and inclusive programs, services, policies, procedures, and practices.		
5.4.3	The functional area must ensure that personnel are trained in diversity, equity, access, and inclusion and are held accountable for applying the training to its work.		
5.4.4	The functional area must have an established protocol for, and foster expectation of, bias incident reporting.		
5.4.5	Personnel within the functional area must cultivate understanding of identity, culture, self-expression, and heritage.		
5.4.6	Personnel must promote respect for commonalities and differences among people within their historical and cultural contexts.		
5.4.7	When educational and/or workplace accommodations are requested, the functional area must provide individuals with an interactive process to determine reasonable accommodations.		