



UTAH SYSTEM OF
HIGHER EDUCATION

MEMORANDUM

TAB B

April 15, 2022

Draft: Equity Policy Review Guide

In Spring 2021, the Commissioner's office began working with the [National Association of System Heads](#) (NASH) through its Equity Action Collaborative, which addresses systemic inequity and promotes inclusive excellence in higher education. As part of the first cohort of the collaborative, the Commissioner's office decided to develop an Equity Policy Review Guide to facilitate a subsequent equity, diversity, and inclusion (EDI) review of the Board's policies. A committee was created to facilitate the development of this guide, which includes the following experts from across the system and the Board:

- Laís Martinez, Assistant Commissioner for EDI (*co-chair*)
- Alison Adams-Perlac, Associate General Counsel (*co-chair*)
- Board member Shawn Newell
- Melanie Heath, Associate Commissioner of Student Affairs and Access
- Dr. Tasha Toy, Chief Diversity Officer and Assistant Vice President for Campus Diversity at Dixie State University
- Jenalee Moynier, Diversity Officer at Uintah Basin Technical College
- Emma Houston, Special Assistant to the Vice President of EDI at University of Utah
- Dr. Clifton Sanders, Provost for Academic Affairs and Chief Academic Officer at Salt Lake Community College

The committee developed the attached draft of the USHE Equity Policy Review Guide based on the [USHE Equity Lens Framework](#) and the Board's strategic plan.

The Commissioner's office is putting together an internal group to conduct an equity policy review of the Board's policies using the Equity Policy Review Guide, with anticipated completion by fall 2022. Recommendations for edits to the Board's policies will go through the Board's normal policy update process. The Board may recommend the Equity Policy Review Guide be utilized at USHE institutions to guide their own institutional policy reviews.

Commissioner's Recommendation

This is a discussion item only; no action is required.

What is an Equity Policy Review?

How do you know if your institution's policies are equitable? Are they working as intended, or are there *unintended* consequences disproportionately harming students, faculty, and/or staff, particularly those from underrepresented backgrounds?

System and institutional policies can play a significant role in closing postsecondary attainment gaps for marginalized and underrepresented students, in line with goals outlined in the [Utah Board of Higher Education's strategic plan](#) to increase the college-going and completion rates of underrepresented groups by 4% in five years. An equity-driven policy review aims to allow an organization to see when policies and practices that appear to be beneficial are actually creating worsening inequalities. It also seeks to shift accountability to the institution rather than to the students.

This guide provides a practical exercise for analyzing the impact that system and institutional policies can have on underrepresented students and employees. The guide is informed by the shared beliefs, definitions, and questions of the [USHE's Equity Lens Framework](#)².

Institutions are welcome to use and adopt the guide to meet unique institutional missions and student needs.

How to form an Equity Policy Review Team

Institutions should identify standing policy review members whose lens will be critical to a majority of the policies versus content experts who could advise the standing group periodically. Institutions should also consider different perspectives from non-experts with possible lived experiences.

Possible standing policy review members:

- Office of Equal Opportunity
- Equity, Diversity, and Inclusion Officer
- Students, staff, and faculty
- Institutional Research/Data
- Finance
- Academic and Student Affairs

¹ USHE's Equity Policy Review Framework is informed by the Minnesota State Office of Equity and Inclusion's *Applying an Equity Lens to Policy Review*, available at <https://www.minnstate.edu/system/equity/docs/Equity-Lens-to-Policy-Review1.pdf>.

² The Equity Lens Framework recognizes intersectional identities including, but not limited to, age, gender identity and expression, sexual orientation, religious affiliation, socioeconomic status, citizenship status and country of origin, ability/disability, veteran status, first-generation student status, English language learner, and/or geographic location (including rural, urban, sheltered, and unsheltered).

Possible content experts:

- Facilities and planning
- Athletics
- Admissions and enrollment
- Faculty (in a particular study)
- Learning modalities

Before conducting an Equity Policy Review

Before conducting an equity policy review, the equity policy review team should seek feedback from relevant stakeholders, including students, faculty, and/or staff, to understand concerns about the policy, institutional climate, policy deficits, etc. Such feedback can be gathered through a climate analysis, focus groups, and/or listening sessions.

- How will your knowledge about those most impacted by the policy review inform and guide your equity policy review?
- Where do current data collection methodologies fail to measure the extent of underrepresentation, marginalization, and lived experiences that create the need for broader analysis, feedback, and input?

Applying an Equity Policy Review

To perform an equity policy review, it is necessary to involve reviewers from marginalized and underrepresented backgrounds and individuals with differing lived experiences and perspectives.

Reviewers should read the [Equity Lens Framework](#) as a start and then ask the following questions about the policy being reviewed, with an eye toward interrogating any preconceived notions of the policy's effectiveness.

An institution should undertake this exercise at least as often as policies are developed and reviewed and whenever an existing or new policy or complete policy set is created, edited, or reviewed. Institutions should also apply this equity review to forms, procedures, and other processes, as relevant.

Questions to use during an Equity Policy Review

PURPOSE AND OUTCOME	<ul style="list-style-type: none">• What are the intended impacts and outcomes of the policy? Does the policy produce unintended consequences when applied in real-world situations?• Does the policy maintain, sustain, or intervene in existing educational disparities?• Does the policy promote optimal working and learning environments, including safety and belonging?
DISPARATE IMPACT	<ul style="list-style-type: none">• Who benefits from the policy? Who is excluded?

	<ul style="list-style-type: none"> Does the policy explicitly account for disparate outcomes by race, socioeconomic status, etc.³?
REPRESENTATION	<ul style="list-style-type: none"> Are relevant stakeholders, including individuals impacted by the policy, included in the policy review⁴?
LANGUAGE EQUITY CONSIDERATIONS	<ul style="list-style-type: none"> Does the policy use gender-neutral, inclusive, affirming, people-first, and asset-based language⁵? Does the policy consider students, faculty, and/or staff in their full and intersectional identities?

OCHE CONSIDERATIONS BASED ON THE BOARD OF HIGHER EDUCATION’S STRATEGIC PLAN	<p><i>Do Access policies:</i></p> <ul style="list-style-type: none"> Reflect the many ways in which a student can enter a postsecondary institution? Consider challenges students face in accessing institutions and their services and programs⁶? Promote all higher education pathways and help ensure student success in any chosen pathway? <p><i>Do Affordability policies:</i></p> <ul style="list-style-type: none"> Consider the cost of attendance beyond tuition, including the cost of basic needs for students (e.g., housing, food, technology, transportation, and childcare)? Reflect an acknowledgment that not all students are eligible for federal and/or state aid, and the implications for those students on access and affordability? <p><i>Do Completion policies:</i></p> <ul style="list-style-type: none"> Recognize that every student has the ability to learn, and ensure institutions are receiving and helping students succeed on an individual level?
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³ This question was inspired by Weber State University’s Strategic Plan’s Equity Framework, available at <https://www.weber.edu/strategic-plan>.

⁴ For the Office of the Commissioner, does the policy promote collaboration across USHE’s 16 institutions?

⁵ The DCFPI Style Guide for Inclusive Language provides definitions and examples of people-first, asset-based language. It is available at https://www.dcfpi.org/wp-content/uploads/2017/12/Style-Guide-for-Inclusive-Language_Dec-2017.pdf.

⁶ Access challenges include, but are not limited to, transitions from IDEA to ADA accommodations, socioeconomic status, and geography/transitioning into bigger areas.

	<ul style="list-style-type: none"> • Aim to provide each USHE student with an opportunity to learn, be employable, develop cultural competencies, and be global citizens? • Honor and credit student prior learning, including work and lived experience, including proficiency in native language? <p><i>Do Workforce policies:</i></p> <ul style="list-style-type: none"> • Support equal access by connecting each student to workforce and internship opportunities? • Reflect the importance of pathways and support workforce and industry partnerships?
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Now what? Considerations after an Equity Policy Review

Following an equity policy review, the institution should ask the following questions to help ensure accountability.

- How is success measured in the policy through data and/or outcomes?
- Does the policy measure success relative to marginalized and underrepresented populations?
- Is data evaluated on an annual or more frequent basis to evaluate success?
- How is the institution held accountable for ensuring that success?
- What changes need to be made based on the data? What is the plan for making such changes?

To ensure that policies and processes are updated in line with equity developments, institutions should update policies, processes, goals, and strategies, with equity in mind, at least every three to five years or more as needed.