



University Policy Equity Audit

University of North Carolina at Chapel Hill
Office of Ethics and Policy
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Table of Contents

Purpose.....	3
Context.....	3
Key Findings.....	3
Background.....	4
Methodology.....	7
Results.....	8
Discussion.....	13
Recommendations and Resources.....	15
Appendix A: Equity Audit Findings by Department.....	16
Appendix B: Sample Equity Review Rubrics for Disparate Impact.....	21
References.....	24

List of Tables

Table 1: Average Reading Level per Responsible Unit.....	8
Table 2: Prevalence of Jargon.....	9
Table 3: Prevalence of Barrier Language.....	9
Table 4: Prevalence of Negative Statements.....	10
Table 5: Prevalence of Digital Accessibility Issues.....	11
Table 6: Policy Template Usage.....	12

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Purpose

The purpose of this report is to identify potential barriers to equity in UNC-Chapel Hill University policy documents and to promote equity and accessibility in policy design and review.

Context

The UNC-Chapel Hill Office of Ethics and Policy was created in 2016 at the joint recommendation of the [Ethics and Integrity](#) and [Policy and Procedures](#) working groups to strengthen a culture of ethical behavior and integrity throughout the University. To this end, the Office of Ethics and Policy is tasked with maintaining a robust structure for policy maintenance.

In recent years, UNC-Chapel Hill has instituted policies requiring non-gendered language and digital accessibility across all University communications and websites. However, these policies have not been universally applied across policy documents. Additionally, several University policies have not been reviewed or updated for nearly a decade. This creates substantial risk for UNC-Chapel Hill, due to the likelihood of those policies' misalignment with the current climate of university operations. The Office of Institutional Integrity and Risk Management (IIRM), created in 2019, presents the University with a perfect opportunity to respond to these policy and compliance needs across campus.

Key Findings

1. Many University policy documents are out of date and contain structural barriers to accessibility including gendered language, high reading levels, extensive jargon, negative statements, and digital accessibility concerns.
2. Departments must integrate principles of equity, access, and inclusivity into their regular policy review processes.
3. Improving the accessibility of University policy documents is an important first step to addressing disparate impact and wider equity concerns in University policy documents.

Background

Equity, Inclusion, Access, and the University

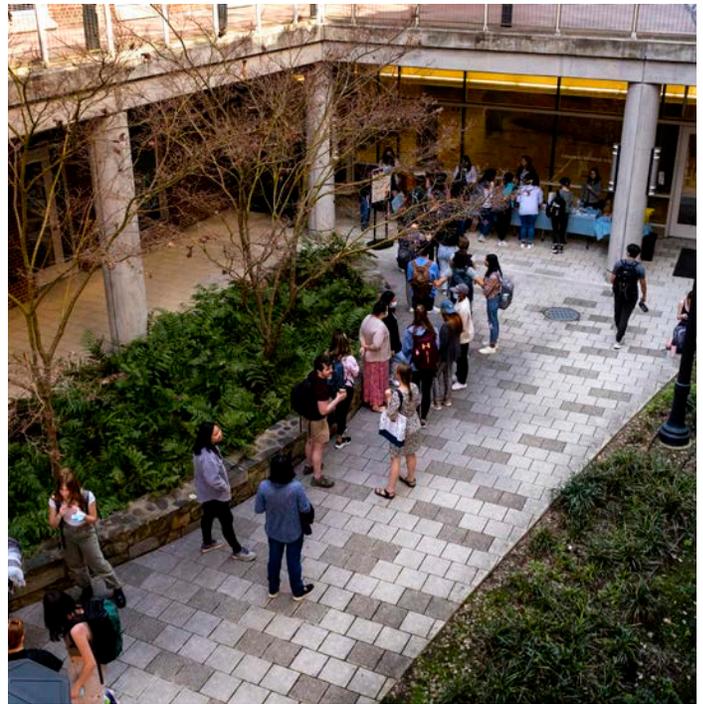
“The term “equity” refers to fairness and justice and is distinguished from equality: Whereas equality means providing the same to all, equity means recognizing that we do not all start from the same place and must acknowledge and make adjustments to imbalances. The process is ongoing, requiring us to identify and overcome intentional and unintentional barriers arising from bias or systemic structures.”

– National Association of Colleges and Employers

An equity-focused perspective asks whether there are disproportionate, systemic impacts within an institution. UNC-Chapel Hill is a microcosm of our larger society, and so issues of bias and access present in the larger society of the United States are also present in UNC-Chapel Hill. Equity is foundational to inclusion, which is an ongoing, intentional engagement with diversity. Institutional inclusion unsurprisingly demonstrates positive effects across the board. By incorporating accessibility and equity into the core of their institutional design, Universities can create more resilient institutions. Studies have found that “the normative promotion of diversity and equity in business environments improves productivity and revenue for organizations at large” (Polineni, 2020).

The institutional benefits of inclusive institutional design are evident from personnel and production perspectives. Family-friendly policies, such as paid family leave (PFL), not only support people who may become pregnant, but further benefit all parents. New parents who use PFL experience overall positive health benefits, such as a lower rate of postpartum depression and stronger physical health indicators. PFL usage also correlates with a stronger long-term parental bond between parent and child and lower incidents of intimate partner violence (Montez et al., 2020). Moreover, non-parent students and employees also benefit from this institutional flexibility.

These benefits at the personnel level lead directly to institutional benefits, such as increased productivity and financial performance; a competitive edge at motivating and retaining students and employees; and higher worker morale across all income groups (UNICEF, 2019). As an example of institutional design, competitive PFL policies develop institutional integrity, benefiting students and staff and leading to sustainable growth across the University.



Similarly, institutional benefits of inclusion are evident with disability accommodations. Accessibility is a pressing societal concern, with nearly one out of five individuals in the US population having some form of disability (U.S. Census). When universities design policies and processes with accessibility in mind, entire communities benefit. Accessibility research employs the term “universal design” to refer to a design approach that incorporates maximum access as a key goal from conceptualization to subsequent review of a project. ADA-mandated curb cuts in sidewalks are a prime example. Curb cuts benefit people with mobility limitations, but also generally benefit the entire community, including individuals with strollers and carts, and the elderly (UMass-Dartmouth). Another example, closed-captioning, is an accessibility tool that benefits the broader public when audio is not easily heard. In both cases, the incorporation of these tools into everyday design supports the larger community.

From a perspective of institutional design, the COVID-19 pandemic has made the benefits of universal design even more apparent. The onset of the pandemic required organizations to quickly repurpose existing technology to support teleworking. Unsurprisingly, organizations that already had a strong accommodations framework in place were able to respond more flexibly to the pandemic and were generally less susceptible to interruptions in operations in the event of employee illness or injury (Shew, 2020).

An accessible, inclusive workplace has institutional resiliency, resulting in lower turnover, less need for disability payments, and more equitable participation of women and employees with families in the workplace, resulting in increased productivity (Shew, 2020). The same principles of inclusive institutional design apply directly to university policy design. Policies designed with equity and inclusion in mind benefit the entire community and promote resilience. Ensuring that policies do not contain unnecessary barriers to access is the first step in ensuring the eventual equity of the university policy environment.

What is a policy equity review?

Typically, an equity review examines policy for accessibility and disproportionate impact. Reviews may consider examining the impact of policies with respect to race, ethnicity, religious expression, veteran status, nationality, age, socioeconomic status, disability, sex, gender, and indigenous populations. Moreover, an equity review promotes institutional accountability by creating a transparent framework for the institution to examine access and impact of policies across campus.

A leader in this field, the University of Minnesota began reviewing equity as a core component of policy in 2018 and pioneered a system today used as a blueprint for others to follow. Minnesota applies its equity lens both to the review of existing policy and the development of new policy. Across the United States, a few other institutions have also undertaken this task by developing new committees for equity review and by drafting rubrics or equity-focused guides for policymakers to consider.



Policy Landscape at UNC-Chapel Hill

According to the [UNC-Chapel Hill Policy Framework](#), policies are written statements that mandate, specify, or prohibit behavior to express basic values of the University, enhance the University's mission, ensure compliance, promote efficiency, and reduce risk. Policies are often supported by standards and procedures, which explain the minimum limits or rules to achieve policy implementation and the high-level processes required to accomplish an action, respectively.

UNC-Chapel Hill has a decentralized policy formation model. Subject-matter experts from campus units write policies to guide operations that they manage across the University. For example, Information and Technology Services (ITS) develops policies related to computer and network use across campus. In recent years, the Office of Ethics and Policy has worked to establish regular review processes for policy documents with some success. Unfortunately, the progress is unevenly distributed across campus and many University policies have not been reviewed or updated for nearly a decade. This creates substantial risk for UNC-Chapel Hill, due to the likelihood of those policies' misalignment with the current climate of University operations and the probability such policies include equity and access issues.

Policy Equity Audit at UNC-Chapel Hill

As a first step to incorporating equity into the review of University policy documents, the Office of Ethics and Policy completed an equity audit during the fall of 2021. This equity audit primarily examined policy for accessibility because increased access allows for greater institutional transparency and is a first step in promoting equity. Unlike other established university equity reviews, UNC-Chapel Hill's approach of conducting a policy audit to collect benchmark data uniquely allows for the University to track its progress over time. The equity audit measured access along six parameters: readability, unnecessary jargon, barrier language, negative statements, digital accessibility, and use of University policy templates.

Readability refers to how easily an audience understands language. Since individuals of varying education levels must access University policy documents, it is critically important that everyone who needs to read a policy can do so. According to The Center for Plain Language, the average American adult reads between a seventh and eighth grade level (Marchand, 2017). By bringing written policy closer to this level of readability, policy writers can increase policy compliance, strengthen enforcement, and limit mistakes from misunderstanding (U.S. National Archives, 2017). Writing University policies at lower reading levels ensures greater equity of access for all University stakeholders.

Jargon is the technical language used within an in-group (Bullock et al., 2009). Jargon is sometimes necessary for clear policy writing; for example, a policy detailing the process of a medical procedure should retain the appropriate language. Other times, jargon does not serve a communicative purpose. Examples include "legalese" words like "shall" and "whereas." Reducing jargon can improve readability and provide greater access to those without specialized knowledge on the subject matter. Avoiding unnecessary jargon even improves understanding among subject-matter experts (Bullock et al., 2009).

Barrier Language is any language which is discriminatory or unwelcoming towards any individuals based on their identity. Identities may include age, ethnicity, employment strata, gender identity, indigenous populations, individuals with apparent and non-apparent disabilities, people of color, race, religious expression, sexual orientation, socio-economic status, women, and veteran status.

Negative Statements direct readers in what not to do. Research finds that negative statements are generally more difficult for readers to understand than positive statements, or statements that tell readers what to do (Plain Language, 2011). Complex negative statements can create confusion and make it difficult for readers to understand policy requirements. Simple negative statements (i.e., "do not enter") are acceptable if they are necessary and easily understood.

Digital Accessibility ensures that people with disabilities can understand and interact with web material. It also improves usability for people without disabilities, in part by improving aesthetics and perceived trustworthiness (Schmutz et al., 2016). Previous studies have emphasized the need to train faculty in digital accessibility to achieve inclusion in higher education (Bong & Chen, 2021).

Policy Templates increase readability with predictable content patterns and provide a clear "look and feel" for official University policy documents. Except for specific situations of external regulatory compliance, it is best practice that policy writers use the standardized templates available on Office of Ethics and Policy website.



Methodology

The UNC-Chapel Hill Office of Ethics and Policy hired four graduate research assistants to conduct the audit of all administrative University policy, standards, and procedures during the Fall 2021 semester. The research team reviewed 959 University-level policies, standards, and procedures across 17 units, for equity and accessibility along six areas.

For readability, the team used an online tool at readabilityformulas.com to identify each policy document's Flesch-Kincaid grade reading-level score based on the number and sequencing of sentences, words, syllables, and characters in a text sample. The Flesch-Kincaid reading levels measured in this report offer a general, comparative aptitude for measuring policy comprehensibility (Benjamin, 2012). The research team defined jargon as field-specific language that included any language which might be considered discriminatory or unwelcoming towards any individuals based on their identity. The research team also searched for negative statements in policy, recognizing that a simple negative statement can sometimes be the clearest way to express a requirement. Finally, research assistants evaluated whether the policies complied with UNC-Chapel Hill digital accessibility guidelines and used the official policy templates or other externally-required formats.

Each research assistant individually reviewed approximately 240 policies (roughly 50 a week). Prior to beginning the review, the research team conducted a quality control evaluation exercise with each team member reviewing the same three policies and then comparing and discussing their findings with other members of the team. The team held weekly meetings to discuss and compare policy analyses. With each reviewer coming from a different educational background, these weekly meetings allowed reviewers to consider perspectives other than their own.

Results

Of the 959 policies, procedures, and standards reviewed, 27% had barrier language, 68% had jargon, 32% had negative statements, and 38% had obvious digital accessibility concerns. Overall, the University policy and procedure templates was used in approximately 79% of these documents. Because the number of policy documents per department ranged from one to 298, comparisons between departments should be made with care. A high percentage of a smaller departments' policies may suffer from one issue, but the overall impact of that issue is less than in a department with many more policies that also exhibits the same issue. The tables in this section report the equity audit findings for the "Responsible Units" as they appear in the University policy website. Appendix A contains detailed tables with ratings in each of the six categories for smaller departments within the units. For example, the tables on the next few pages report results for "Research," but Appendix A breaks Research into its smaller sub-units including the Office of the Vice Chancellor for Research, Institutional Animal Care and Use, the Office of Post-Doctoral Affairs, and others.

Responsible Unit	Average Reading Level
Finance and Operations	13.56
University Communications	14
Office of the Provost	14.05
Institutional Integrity and Risk Management	15.14
Office of Internal Audit	15.2
Research	15.33
Department of Athletics	15.73
Office of University Development	15.8
Office of the Chancellor	15.98
Human Resources and Equal Opportunity and Compliance	16.66
Office of University Counsel	16.98
Information Technology Services	17.2
Carolina Performing Arts	17.9
Board of Trustees	18.8
Average Reading Level	15.71

Readability: Reading Level

The average reading level for all 959 policies is 15.71, meaning that the reviewed policy documents are comprehensible to an average third-year (almost fourth year) college student. The highest average reading level for policy documents, 21.05, is in the Institutional Privacy Office, nested under Institutional Integrity and Risk Management. Facilities Services, within Finance and Operations, had the lowest average policy document reading level at 7.6.

Some policies with widespread application are written at very high reading levels. One example is the UNC Digital Accessibility policy, which registered at a reading level of 19.2. Although this policy should be easily understood by everyone on campus, from first-year students to faculty and staff, the reading level indicates that only those with post-baccalaureate studies would easily understand this content.

Table 2: Prevalence of Jargon			
Responsible Unit	Total Policy Document Count	Policy Documents with Jargon	Percent of Documents with Jargon
Carolina Performing Arts	1	0	0%
Board of Trustees	1	1	100%
Office of Internal Audit	1	1	100%
University Communications	3	2	67%
Office of the Chancellor	4	4	100%
Office of University Counsel	8	6	75%
Department of Athletics	6	6	100%
Office of University Development	11	10	91%
Office of the Provost	24	12	50%
Student Affairs	39	19	49%
Information Technology Services	29	23	79%
Human Resources and Equal Opportunity and Compliance	116	88	76%
Research	172	115	67%
Finance and Operations	246	155	63%
Institutional Integrity and Risk Management	298	207	69%
Total	959	256	68%

Table 3: Prevalence of Barrier Language			
Responsible Unit	Total Policy Document Count	Policy Documents with Barrier Language	Percent of Documents with Barrier Language
Board of Trustees	1	0	0%
Carolina Performing Arts	1	0	0%
Information Technology Services	29	1	10%
University Communications	3	1	33%
Office of Internal Audit	1	1	100%
Office of University Development	11	2	18%
Office of the Chancellor	4	2	50%
Student Affairs	39	5	13%
Office of the Provost	24	5	21%
Office of University Counsel	8	5	63%
Department of Athletics	6	5	83%
Research	172	33	19%
Human Resources and Equal Opportunity and Compliance	116	47	41%
Finance and Operations	246	49	20%
Institutional Integrity and Risk Management	298	98	33%
Total	959	256	27%

Jargon

The presence of jargon was the single most common finding during the policy audit, with 68% of University policy documents exhibiting jargon.

Many policies use key terms and acronyms without ever providing contextual definitions. Legal words like “shall,” “thus,” and “therefore,” are present in numerous policy documents. In some cases, scientific jargon such as “zoonotic” could be replaced with less technical terms to increase understanding. Additionally, many of the policies which contain technical scientific language also use high level vocabulary for more innocuous words. For example, science, maintenance, and safety manuals often include “ingress” and “egress,” which serve no obvious scientific purpose, and could be replaced with “entrance” and “exit.”

Barrier Language

Instances of gendered language when referring to students, employees, and affiliates were common. Other examples of barrier language found primarily in payroll and business policies include “nonresident and resident alien.” Another example of barrier language was the phrase “normal healthy humans,” implying that there is also a category of non-normative healthy or unhealthy humans, which could exclude or ostracize individuals with disabilities or varying life circumstances.

Table 4: Prevalence of Negative Statements

Responsible Unit	Total Policy Document Count	Policy Documents with Negative Statements	Percent of Documents with Negative Statements
University Communications	3	0	0%
Board of Trustees	1	0	0%
Office of Internal Audit	1	0	0%
Carolina Performing Arts	1	1	100%
Office of the Chancellor	4	2	50%
Office of University Development	11	3	27%
Office of University Counsel	8	4	50%
Department of Athletics	6	5	83%
Office of the Provost	24	9	38%
Information Technology Services	29	15	52%
Student Affairs	39	23	59%
Finance and Operations	246	42	17%
Research	172	43	25%
Human Resources and Equal Opportunity and Compliance	116	52	45%
Institutional Integrity and Risk Management	298	105	35%
Total	959	304	32%

Negative Statements

Approximately one third of UNC-Chapel Hill policies contained complex negative statements. Passive voice and jargon frequently accompanied negative phrasing. The examples in the box show how policy stakeholders can rewrite confusing or complex negative statements to be clearer. Note that the revised version of example 3 still contains a negative statement but is now much easier for a potential research participant to understand.

Example 1: "Shall have been dead not less than one year."

REVISED: "Has been dead for at least one year."

Example 2: "will not access PHI that is not necessary for the performance of their relevant job duties..."

REVISED: "may only access PHI that is necessary to the performance of their relevant job duties..."

Example 3: "an individual's treatment may not be conditioned upon whether or not the individual signs the research authorization."

REVISED: "an individual does not have to sign the research authorization to receive treatment."

Digital Accessibility

The most frequent digital accessibility issue was providing links for referenced pages, articles, organizations, or other items. For example: policy documents that mention another policy, but do not include a link to that document make it more difficult to navigate to important information. In some cases, a document might reference a policy or form that is only accessible in ConnectCarolina, the university's student and staff portal, without providing a link or explaining how to access the information. Other digital accessibility issues, including exposed links within texts, were also common.

Table 5: Prevalence of Digital Accessibility Issues

Responsible Unit	Total Policy Document Count	Policy Documents with Digital Accessibility Issues	Percent of Policy Documents with Digital Accessibility Issues
Carolina Performing Arts	1	0	0%
Board of Trustees	1	1	100%
Office of Internal Audit	1	1	100%
University Communications	3	2	67%
Office of the Chancellor	4	4	100%
Office of University Counsel	8	6	75%
Department of Athletics	6	6	100%
Office of University Development	11	10	91%
Office of the Provost	24	12	50%
Student Affairs	39	19	49%
Information Technology Services	29	23	79%
Human Resources and Equal Opportunity and Compliance	116	88	76%
Research	172	115	67%
Finance and Operations	246	155	63%
Institutional Integrity and Risk Management	298	207	69%
Total	959	256	68%

University Policy and Procedure Templates

Approximately 21%, or 200 policies, failed to follow the UNC-Chapel Hill policy document templates or were missing information from those templates. Many of the policy documents missing information did not include any policy contact information or definitions. While the definitions section is an optional field, several of the policies without clear definitions used extensive jargon and would have benefited from defining multiple terms.

Responsible Unit	Total Policy Document Count	Policy Documents Using the Templates	Percent of Policy Documents Using the Templates
University Communications	3	0	0%
Board of Trustees	1	0	0%
Office of Internal Audit	1	0	0%
Carolina Performing Arts	1	1	100%
Office of the Chancellor	4	2	50%
Office of University Development	11	3	27%
Office of University Counsel	8	4	50%
Department of Athletics	6	5	83%
Office of the Provost	24	9	38%
Information Technology Services	29	15	52%
Student Affairs	39	23	59%
Finance and Operations	246	42	17%
Research	172	43	25%
Human Resources and Equal Opportunity and Compliance	116	52	45%
Institutional Integrity and Risk Management	298	105	35%
Total	959	304	32%

Overall, the results of this initial policy equity audit indicate that most UNC-Chapel Hill units have work to do in ensuring all of their policy documents are widely accessible to members of the Carolina Community and the public.

Discussion

Recurring digital accessibility errors, instances of gendered language, and unnecessarily complex text in policy documents create equity and access issues across University policy, standards, and procedures. The following section addresses each area for review in more detail.

High Reading Level

The Flesch-Kincaid Grade test results suggests that the complexity of many policy documents is comparable to graduate-level texts. These high reading levels present considerable accessibility and equity concerns, as UNC-Chapel Hill policies often apply to the large undergraduate student population, incoming students who have not yet completed high school, staff with varied educational backgrounds, and a large international population. Reading barriers, like reading disabilities, can pose challenges to understanding even among readers with highly specialized knowledge (W3C: World Wide Web Consortium, 2016). Reading barriers can make it difficult to recognize written or printed words and associate them with the correct sounds, a process known as decoding. Texts that use short, common words and direct sentences are easier to decode. Even for policies requiring significant scientific or occupation-specific language, non-technical language must be written clearly and avoid unnecessarily complex language. Difficult and complex language has been shown to result in large business losses (SHRM, 2020) and lab accidents (Weil, 2012) and is a particular barrier to non-native English speakers.

With more than 1,200 international community members, UNC-Chapel Hill ranked 26th among US host institutions for international scholars according to the 2019 IIE Open Doors Report on International Educational Exchange (UNC Global). While these international community members are typically proficient in English, the jargon in many UNC-Chapel Hill policies may pose challenges. Native speakers often underestimate the complexities of the language along with the colloquialisms, slang, and culture-specific references. Non-native speakers benefit when communication is purposeful with simpler vocabulary and expressions. Global English is a form of plain writing that emphasizes precise word-usage, brevity in writing, and avoidance of jargon which minimizes misunderstandings. When documents are written in this style, they sound natural to native English speakers while considering an international perspective. According to Global English norms, authors should avoid synonyms and only use terms with their primary meaning. The aerospace industry, an early adopter of Global English to cater to its high number of international workers, practices Global English and uses specific strategies highlighted in the box below to support its workers.

Use the primary meaning of words. For example, "Close" is to shut.

- Correct: "close the door"
- Incorrect: "go close to the door" (which would be written "go near the door")

Choose a more limited and straightforward vocabulary.

- Example: use the more familiar "start" over synonyms like "begin" or "commence"

Write direct statements in active voice and simple tenses.

- Correct: "Individuals may recover a lost certificate."
- Incorrect: "If a certificate is lost, it may be recovered."

Barrier Language

UNC-Chapel Hill has a [Policy on Gender-Inclusive Language](#). Obviously, the application of this policy is uneven at best, as gendered language was consistently the largest finding of barrier language in the audit. This use of gendered language in policy excludes those who wish to use with gender-neutral identifiers such as "they/them" and demonstrate a lack of awareness of and respect for non-binary, agender, and intersex people. According to the 2011 UNC LGBTQ Campus Climate Report, 8.4% of survey respondents in the University community identified outside the cisgender binary. This survey also demonstrates the importance of providing support to these groups,

as respondents in the Transgender, Intersex, and Genderqueer categories more often reported experiencing verbal harassment (31.8%) and fear for physical safety (36.4%). Even for those who do identify within the gender binary, constant references to male and female categories may lead readers to perceive men and women as more different than they really are and to assign various characteristics to these roles that align with gender norms (Elsesser, 2020).

In April 2021, the Biden Administration directed Immigrations and Customs Enforcement (ICE) to replace certain words in an attempt to create a more humane immigration system. It called for ICE to discontinue the use of “alien” in favor of “non-citizen” (Rose, 2021). Although the executive branch has recognized the importance of humanizing immigration language, other parts of the federal government, including the Internal Revenue Service (IRS), continue to use “resident-non-resident alien” language. Likely following the lead of the IRS, UNC-Chapel Hill Finance policy documents also continue to refer to non-citizens as “resident/non-resident aliens.”

Jargon and Readability

The results demonstrate a need to re-evaluate the use of complex language in UNC-Chapel Hill's policy documents. Many policies and procedures would benefit including the definitions section to expand upon abbreviated or technical terms like “EHRA” and “SHRA,” which are used widely in Human Resources policy without explanation. Technical language (such as scientific terminology, medical terms, and legal terms) can be important to ensuring accuracy, but policy owners should opt for plain language whenever jargon does not serve a specific regulatory or communicative purpose.

Digital Accessibility

Beyond the need for departments to use official policy document templates for formatting and consistency, the research team found other digital accessibility considerations. Policy writers can increase digital accessibility by streamlining navigation options, adding alternative text to images, and reducing page clutter. These, and other best practices are explained in the UNC-Chapel Hill Digital Accessibility Office's [Top 10 Tips for Digital Accessibility](#). Departments should further consider the role of internet access or technology in their processes and any translation needs in their operations. Most operations and resources referenced in University policy require technology to access (for example, payroll information in ConnectCarolina.) Departments should also consider questions of access to hardware (i.e., computers) and translation services when reviewing their policies.



Report Limitations

Although this initial equity audit has generated a number of interesting findings, it does have a few limitations. First, this audit represents a single point in time, meaning some of the policies may have changed during the researchers' analysis. It was not feasible to stop the University policy process for this project; however, even if policies underwent change during this review, this policy analysis still fills an important gap in applying an equity lens to identify potential roadblocks to equity and inclusion across all University policy.

Second, each policy was reviewed by one research assistant, rather than multiple examiners. While this allowed for more policies to be reviewed, this can lead to individual bias. Individual bias and experience could have led to some research assistants identifying a concern that others may not have flagged. To mitigate inconsistencies, the team conducted the previously mentioned quality control exercise, where each reviewer analyzed the same three policies and compared the findings. The team also met weekly to discuss issues they identified.

Recommendations and Resources

For the sake of brevity, this section provides a set of overarching recommendations. All units should review the findings and their policies along these six dimensions for access and equity.

Readability, Accessibility, and Barrier Language

- Provide a 150-to-250 word summary at the ninth grade reading level for each policy similar to an abstract highlighting the purpose and audience of the policy document.
- Include accompanying visual illustrations, pictures, and symbols to help explain ideas, events, and processes when possible.
- Review policies with specific attention to the impact of the policy across different populations on campus (such as individuals with disabilities, non-citizens, people of color, etc.).
- Use gender-neutral terminology to refer individuals mentioned in policies, such as “students,” “employees,” “affiliates,” or “persons.” In general, referring to individuals by their role often makes policy more precise. Reference the UNC Writing Center’s [gender-inclusive writing guide](#).
- Use negative statements only when they increase clarity.
- Replace non-essential jargon with more common words and phrases. Refer to the U.S. Government [Plain Language Guidelines](#) for more advice.
- Define terms and abbreviations in the Definitions section of the policy document when jargon is necessary. Be sure to use these terms consistently throughout the document.

Best Practices for Policy Review and Formatting

- Review policy documents at least once every three years to ensure documents have the most up-to-date content and conform to evolving best practices.
- Ask people without subject matter expertise to review policies during the review to ensure the document is accessible to a wide audience.
- Except for when specific regulatory requirements require otherwise, use the UNC-Chapel Hill policy document templates for policy, procedures, and standards.
- Consult with the UNC-Chapel Hill Office of Digital Accessibility to ensure documents conform to current digital accessibility requirements and best practices.

Next Steps

The policy equity audit represents an important first step to institutionalizing equity at UNC-Chapel Hill. Improving the language and digital accessibility of University policy documents will pave the way for policy owners to consider questions of disparate impact more deeply in their policy development and review. Appendix B contains sample rubrics which policy owners may use as they draft or review their policy documents for this purpose. Furthermore, the University may consider conducting a community needs assessment, where UNC-Chapel Hill community members may submit feedback regarding any institutional gaps or barriers. Setting SMART goals, or goals that are Specific, Measurable, Achievable, Realistic, and anchored within a Time Frame, makes equitable design tangible.

In order to design for equity, universities must observe their institutional systems for structural deficits, rather than individuals themselves (Race Forward, 2020). Policymakers may consider using tools such as surveys, focus groups, and advisory committees with representatives from various student and employment groups to develop policy. Disadvantaged communities may have less access to these data-collection mechanisms, so UNC-Chapel Hill policymakers should monitor data collection to ensure access and participation across communities of different race, ethnicity, class, gender, sexual-orientation, ability, and immigration status.

Lastly, as policy-writing is an ongoing process, so is equitable design. UNC-Chapel Hill must invest resources to achieve policy equity on campus. Currently, very few individuals on campus claim policy as a primary job responsibility. UNC-Chapel Hill should designate and fund positions for policy managers in each department. UNC-Chapel Hill leadership should also ensure that the University DEI Council, Office of Ethics and Policy, and other stakeholders are adequately resourced to promote institutional equity.

Conclusion

UNC-Chapel Hill policy documents are foundational for institutional integrity, and it is important to consider matters of equity and access during their creation and revision. The process for maintaining University documentation is ongoing and so we hope this equity audit will spur the revision of policy with equity and accessibility in mind. This will in turn, help build a more inclusive, resilient community.

Appendix A: Equity Audit Findings by Department

Finance and Operations: Equity Scoring per Department												
Unit	Average Reading Level	Total Policies	Barrier Language	Barrier Language Percent	Jargon	Jargon Percent	Negative Statements	Negative Statements Percent	Digital Accessibility Concerns	Digital Accessibility Percent	Uses Policy Template	Uses Policy Template Percent
Accounting Services	13.98	5	2	40%	4	80%	1	20%	2	40%	5	100%
Accounts Payable and Vendor Services	12.14	20	7	35%	11	55%	4	20%	6	30%	20	100%
Associated Entities and Investment Accounting	15.06	17	2	12%	16	94%	2	12%	2	12%	17	100%
Budget Planning and Analysis	12.45	13	2	15%	10	77%	3	23%	3	23%	13	100%
Carolina Managed Print Services	10.00	1	0	0%	0	0%	0	0%	0	0%	1	100%
Cash Management	12.89	18	0	0%	10	56%	4	22%	3	17%	18	100%
Facilities Services	7.60	1	0	0%	0	0%	0	0%	1	100%	1	100%
Finance and Budget	9.10	1	0	0%	0	0%	0	0%	0	0%	1	100%
Materials Management	13.37	16	0	0%	3	19%	5	31%	3	19%	16	100%
Office of the Controller	14.00	8	1	13%	6	75%	2	25%	0	0%	8	100%
One Card Office	12.17	3	2	67%	1	33%	1	33%	0	0%	0	0%
Payroll	14.02	48	22	46%	31	65%	5	10%	15	31%	40	83%
PCI/Merchant Accounts	15.65	8	1	13%	7	88%	1	13%	3	38%	8	100%
PID Office	14.17	3	1	33%	3	100%	0	0%	0	0%	0	0%
Procurement	13.44	45	1	2%	29	64%	5	11%	10	22%	45	100%
Real Estate Operations	14.80	1	0	0%	0	0%	0	0%	0	0%	1	100%
Transportation and Parking	12.50	1	1	100%	1	100%	1	100%	1	100%	1	100%
Travel and Payment Card Services	13.68	20	4	20%	15	75%	5	25%	11	55%	20	100%
Treasury Services	14.50	6	0	0%	1	17%	1	17%	3	50%	6	100%
University Cashiers/Student Accounts	13.39	9	2	22%	6	67%	2	22%	5	56%	9	100%
University Mail Services	10.85	2	1	50%	1	50%	0	0%	1	0.5	1	50%
Total	13.56	246	49	20%	155	63%	42	17%	69	28%	231	94%

Human Resources and Equal Opportunity and Compliance: Equity Scoring per Department												
Unit	Average Reading Level	Total Policies	Barrier Language	Barrier Language Percent	Jargon	Jargon Percent	Negative Statements	Negative Statements Percent	Digital Accessibility Concerns	Digital Accessibility Percent	Uses Policy Template	Uses Policy Template Percent
Equal Opportunity and Compliance	18.55	17	4	24%	14	82%	8	47%	6	35%	11	65%
Human Resources	16.33	99	43	43%	74	75%	44	44%	21	21%	48	48%
Total	16.66	116	47	41%	88	76%	52	45%	27	23%	59	51%

Institutional Integrity and Risk Management: Equity Scoring per Department												
Unit	Average Reading Level	Total Policies	Barrier Language	Barrier Language Percent	Jargon	Jargon Percent	Negative Statements	Negative Statements Percent	Digital Accessibility Concerns	Digital Accessibility Percent	Uses Policy Template	Uses Policy Template Percent
Central Compliance	16.95	2	1	50%	2	100%	0	0%	0	0%	1	50%
Conflict of Interest	19.00	2	2	100%	2	100%	1	50%	2	100%	0	0%
Emergency Management and Planning	16.70	1	0	0%	0	0%	0	0%	1	100%	0	0%
Environment, Health and Safety	15.00	186	68	37%	142	76%	67	36%	98	53%	181	97%
Ethics and Policy Office	18.03	4	0	0%	3	75%	2	50%	0	0%	4	100%
Export Controls Office	13.90	1	0	0%	1	100%	0	0%	0	0%	1	100%
Maintenance and Construction/Support Services Safety	13.23	29	10	34%	26	90%	18	62%	14	48%	29	100%
Institutional Privacy Office	21.05	13	9	69%	9	69%	5	38%	4	31%	2	15%
Protection of Minors	16.53	3	0	0%	0	0%	1	33%	0	0%	3	100%
Risk Management Services and Mission Continuity	15.66	26	2	8%	8	31%	5	19%	10	38%	23	88%
UNC Police	14.00	31	6	19%	14	45%	6	19%	27	87%	31	100%
Total	15.14	298	98	33%	207	69%	105	35%	156	52%	275	92%

Information Technology Services: Equity Scoring per Department												
Unit	Average Reading Level	Total Policies	Barrier Language	Barrier Language Percent	Jargon	Jargon Percent	Negative Statements	Negative Statements Percent	Digital Accessibility Concerns	Digital Accessibility Percent	Uses Policy Template	Uses Policy Template Percent
Digital Accessibility Office	17.47	3	0	0%	3	100%	2	67%	1	33%	3	100%
Information Technology Services	17.17	26	3	12%	20	77%	13	50%	9	35%	26	100%
Total	17.20	29	3	10%	23	79%	15	52%	10	100%	29	100%

Student Affairs: Equity Scoring per Department												
Unit	Average Reading Level	Total Policies	Barrier Language	Barrier Language Percent	Jargon	Jargon Percent	Negative Statements	Negative Statements Percent	Digital Accessibility Concerns	Digital Accessibility Percent	Uses Policy Template	Uses Policy Template Percent
Accessibility Resources and Service	16.45	2	1	50%	2	100%	1	50%	0	0%	2	100%
Carolina Union	11.83	19	0	0%	7	37%	14	74%	13	68%	4	21%
Office of the Vice Chancellor for Student Affairs	16.33	9	2	22%	6	67%	5	56%	5	56%	6	67%
University Career Services	12.60	9	2	22%	4	44%	3	33%	5	56%	0	0%
Total	13.28	39	5	13%	19	49%	23	59%	23	59%	12	31%

Office of the Provost: Equity Scoring per Department												
Unit	Average Reading Level	Total Policies	Barrier Language	Barrier Language Percent	Jargon	Jargon Percent	Negative Statements	Negative Statements Percent	Digital Accessibility Concerns	Digital Accessibility Percent	Uses Policy Template	Uses Policy Template Percent
Office of Institutional Research and Assessment	20.20	1	0	0%	1	100%	0	0%	0	0%	1	100%
Office of Technology Commercialization	20.20	1	0	0%	1	100%	1	100%	1	100%	0	0%
Office of the Provost	16.63	4	1	25%	2	50%	2	50%	2	50%	4	100%
Summer School	11.39	14	2	14%	7	50%	5	36%	6	43%	6	43%
Undergraduate Admissions	18.10	1	0	0%	0	0%	0	0%	0	0%	1	100%
University Libraries	17.30	2	1	50%	0	0%	0	0%	0	0%	2	100%
University Registrar	18.10	1	1	100%	1	100%	1	100%	1	100%	1	100%
Total	14.05	24	5	21%	12	50%	9	38%	10	42%	15	63%

Research: Equity Scoring per Department												
Unit	Average Reading Level	Total Policies	Barrier Language	Barrier Language Percent	Jargon	Jargon Percent	Negative Statements	Negative Statements Percent	Digital Accessibility Concerns	Digital Accessibility Percent	Uses Policy Template	Uses Policy Template Percent
Institutional Animal Care & Use Committee	14.87	35	2	6%	18	51%	6	17%	10	29%	35	100%
IRB and Human Research Ethics	14.61	51	24	47%	47	92%	15	29%	34	67%	0	0%
Office of Postdoctoral Affairs	14.30	1	1	100%	1	100%	1	100%	1	100%	1	100%
Office of Sponsored Research	15.57	74	3	4%	39	53%	14	19%	11	15%	72	97%
Office of the Vice Chancellor for Research	19.29	7	2	29%	7	100%	7	100%	4	57%	5	71%
Sustainable Carolina	17.55	4	1	25%	3	75%	0	0%	2	50%	4	100%
Total	15.33	172	33	19%	115	67%	43	25%	62	36%	117	68%

Appendix B: Sample Equity Review Rubrics for Disparate Impact

This rubric is to assist Issuing Officers and other individuals who write, review, or revise policies, procedures, and standards, to identify areas of improvement needed to ensure that the University of North Carolina at Chapel Hill maintains an equitable policy environment.

Scale	Definition
Emerging (Not Met)	The policy/standard/procedure does not use an equity-focused design and/or language.
Developing (Partially Met)	The policy/standard/procedure is beginning to implement equity-focused changes.
Transforming (Fully Met)	The policy/standard/procedure fully recognizes equity-focused language and systems.
Not Applicable (N/A)	Policy/standard/procedure does not have equity implications

Criteria	Emerging (Not Met)	Developing (Partially Met)	Transforming (Fully Met)	Not Applicable (N/A)	Supporting Evidence
The title and body of the policy document are written in plain language.	The title and/or body of the policy document uses jargon or other terms of art making it difficult to understand	The policy document needs minor revisions to improve clarity in the title and/or body.	The policy document is clear and easily understood by all potential readers.		
The policy document uses inclusive language.	Use of gendered or ableist language. Intentionally or unintentionally ignores certain groups.	Mix of inclusive and non-inclusive language present in the policy document	Fully incorporated inclusive language.		
The policy document promotes the removal of barriers to student, faculty, or staff success and does not create any undue hardships.	The policy document promotes barriers to access and/or success and potentially creates undue hardships for students, faculty, or staff.	The policy document removes some, but not all barriers to access and/or success and potentially creates undue hardships for students, faculty, or staff.	The policy document promotes the removal of barriers to access and/or success and potentially creates undue hardships for students, faculty, or staff.		
The policy document promotes fairness and considers the individualized needs of those affected.	The policy document is not fair-minded and fails to incorporate diversity, equity, and inclusion.	The policy document incorporates some diversity, equity, and inclusion aspects, but needs strengthening.	The policy document incorporates diversity, equity, and inclusion aspects.		

Criteria	Emerging (Not Met)	Developing (Partially Met)	Transforming (Fully Met)	Not Applicable (N/A)	Supporting Evidence
The policy document acknowledges subjectivity and human bias and works to lessen its impact.	The policy document clearly has unaddressed human bias.	The policy document has some information about lessening, addressing, and handling bias.	The policy document addresses bias and is thoughtful and inclusive.		
The policy document promotes collaboration and does not construct barriers to work and ideas.	The policy document results in a structural barrier to communication and collaborative thinking.	The policy document acknowledges existence of structural barriers to communication and collaboration in the shared work of the University.	The policy document actively lessens structural barriers to communication and collaboration through the active promotion of sharing and distribution of ideas and responsibilities.		
The policy document includes intentional and appropriate language to validate every person's experience, goals, and knowledge as a human being.	The policy document employs language that singles out, excludes, or stereotypes a specific group/demographic.	The policy document uses some language to convey that each person is essential and valued.	The policy document's language clearly demonstrates success as a goal for everyone.		

Additional **student-specific** rubric rows to include in a separate, similar, rubric for **academic policies**.

Criteria	Emerging (Not Met)	Developing (Partially Met)	Transforming (Fully Met)	Not Applicable (N/A)	Supporting Evidence
The policy document promotes access to high quality instruction, services, activities, and spaces.	The policy document does not meet the access needs of all students.	The policy document partially meets the access needs of all students.	The policy document has introduced change that will lead to or already meets the access needs of all students.		
The policy document promotes the success to teaching and learning using exemplary evidence-based equitable practices centered on student success.	The policy document promotes the success of both teaching and learning with inequitable means. It lacks the diversity and transparency of evidence-based practices that center on student success.	The policy document promotes teaching and learning success by eliminating some, but not all inequity.	The policy document promotes the success of both teaching and learning with equitable means, employing the diversity and transparency of evidence-based practices that center on student success.		
The policy document emphasizes the creation of an inclusive environment where student success and empowerment are cultural norms.	The policy document does not demonstrate an effort to promote all students, including those underrepresented and their cultural norms.	The policy document attempts to improve representation, but still does not represent all students and cultures.	The policy document tries to provide consideration and representation for all students and cultures by adequately promoting every student's essential value.		

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