FOREWORD

To truly support students who traditionally have faced greater obstacles to accessing and completing higher education, states, higher education systems, and institutions need an explicit equity focus to inform all efforts related to this essential work.

What do we mean by equity focus? An equity focus in policy recognizes the need to eliminate disparities in educational outcomes of students from underserved and underrepresented populations. It is deliberately color-conscious, and seeks specifically to eliminate the widening postsecondary gaps for Native American, African American, Latino students, and marginalized Asian American groups. It prioritizes institutional accountability rather than student deficits, and monitors the impact of all policy on marginalized groups. This perspective is critical because it allows states to see when policies and practices that appear to be beneficial actually are creating or worsening inequality.

In the spring of 2015, Lumina Foundation partnered with the Center for Urban Education (CUE) to develop a State Policy Academy focused on Addressing Equity Gaps in State Goals for Postsecondary Education Attainment. A core goal of the academy was to increase the number of states with higher education attainment goals that address closing the gap for underrepresented populations. According to Lumina, “no state can meet its workforce demands without attention to long-standing equity gaps.”

Researchers from CUE began by interviewing state policy leaders in four states that had already embedded equity in their state attainment goals: Colorado, Indiana, Maryland, and Texas. They also reviewed 13 state strategic plans for equity-related language. The purpose was to understand the processes states have used to address equity, how states gain buy-in from key stakeholders, and how states have framed equity within their strategic plans.

The end product of this intensive and collaborative work is a series of three resources that provide guidance to state leaders and policymakers on 1) breaking down barriers to conversations about equity, 2) embedding equity in state policy, and 3) assessing existing—and future—policies and initiatives to determine whether they achieve an equity focus.

The Protocol for Assessing Equity-Mindedness in State Policy would not have been possible without the support of Lumina Foundation. We hope that it is a useful tool for state and higher education leaders who are working to improve postsecondary attainment for students who have been historically left out of higher education.

Estela Mara Bensimon
Director, Center for Urban Education
Professor of Higher Education, University of Southern California

An equity focus in policy recognizes the need to eliminate disparities in educational outcomes of students from underserved and underrepresented populations.
INTRODUCTION: HOW TO USE THIS DOCUMENT TO ADVANCE AN EQUITY IMPERATIVE

This protocol fills an important void for states that want to make real strides toward improving higher education attainment for all, especially racial, ethnic, and indigenous populations. It is intended to serve as a workbook for policymakers, teams, and individuals assessing whether and how effectively equity is addressed in policies that structure higher education priorities, outcomes, and resource allocation. The protocol can be used to assess policy at every level of education, including, for example, institutional policy, policy created by state systems of higher education, as well as policy developed or mandated by state and federal government.

The protocol provides background information about why equity matters. It includes prompts and procedures to use in evaluating postsecondary policies, reports, strategic plans, and other formal documents to determine whether they achieve an equity focus that can raise attainment for marginalized students. Effective use of these resources will help leaders:

• **Assess policy intents and inclusiveness:** What does the policy aim to do? Does the policy indicate who is to benefit? Who is left out?

• **Uncover policy assumptions:** What are the taken-for-granted assumptions made about students and institutions within the policy? In what ways might the taken-for-granted assumptions impact equity?

• **Make equity intentional rather than accidental.**

• **Invite reflection on the ways in which state policies can advance the “equity imperative.”**

Three sections comprise this protocol: Part One provides background information about equity-minded policy—and will equip leaders to explain why such a focus is important. Part Two details six key Equity-Minded Policy Indicators and real state-level examples of each. Part Three provides Policy Review Prompts for each of the six indicators to help determine whether goals and policies have achieved an equity focus. It includes a worksheet, which can be used by groups and individuals to practice and guide policy review procedures.

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“Equity is not ‘nice to have.’ It’s a ‘got to have.’ Unless we focus on African American and Latino students, our country will not get to where it needs to be.”

Jamie P. Merisotis
President and CEO, Lumina Foundation

Since 1999, the Center for Urban Education (CUE) has led socially conscious research and developed tools to help institutions of higher education produce equitable student outcomes. Located in the University of Southern California’s Rossier School of Education, CUE is committed to closing racial-ethnic equity gaps and improving student outcomes in higher education. Rather than remediate students, CUE remediates practices, structures, and policies.
PART ONE: BACKGROUND

Why is Equity-Minded Policy Analysis Important? Equity-minded policy analysis is important because history has shown that well-intentioned policies can harm racial, ethnic, and indigenous populations with a history of educational and economic deprivation. Equity-mindedness considers the impact of policy on the distribution of power, access to resources and knowledge, and the reproduction of social stratification. The application of an equity perspective requires policymakers to assess policy by considering who benefits, who loses, and how low-income and minoritized students fare as a result of the policy. An equity-minded analysis provides a lens that brings into focus how policies and practices that—on the surface—appear beneficial can create or worsen inequalities for some groups. An equity-minded lens can also help identify equity “assets,” or policies that may already be in place that advance equity.

Why Race? People often ask, “Why focus on race, rather than other factors—such as socioeconomic status?” There are at least five key reasons why policy must explicitly focus on race:

1. “Color” and other characteristics of racial, ethnic, and indigenous communities are visible.
2. Racial, ethnic, and indigenous communities have been subject to legally sanctioned exclusion from access to education and use of their native languages.
3. Financial aid policies exist to remove barriers to admission for low-income students, no comparable policies exist to remediate for discrimination.
4. Class- or socioeconomic-based affirmative action favors low-income White students.
5. Not focusing on race obstructs the democratic purposes of education.

Why Equity? Equity is not the same as diversity, nor is it the same as equality. Diversity and equality, though important, do not allow for the direct and explicit focus on racial inequities in higher education.

Policymakers often confront a number of challenges standing in the way of getting equity on the postsecondary policy agenda. The first guide in this series, Improving Attainment: Making Equity Part of Your State’s Postsecondary Planning, provides detailed information and tools to equip those working to break down barriers—many of which stem from the questions on the left.
1. **EQUALITY** imagines an equal world. "I care about all students equally"

2. But the world ISN’T EQUAL.

3. And it has BIAS AND SYSTEMIC RACISM.

4. Within this same picture, a DIVERSITY lens focuses only on bringing more students into an unequal pathway.

5. In contrast, EQUITY redirects resources to the pathways with greatest need to fix barriers and intentionally provide support.

Understanding The Equity Imperative

Equity requires policies and practices that directs resources where they are needed to fix barriers to achievement and provide the necessary support. When states focus solely on diversity, they bring more students into systems that put too many students on predictable paths toward failure.
EXAMPLE: Creating Equity-Minded Change in State Policy

In 2015 the Center for Urban Education (CUE) urged California state policymakers to change the text in the Governor's Innovation Awards guidelines. The award text, which represented state policy, did not explicitly address issues of racial inequity. The diagram below shows how CUE’s actions helped to identify the lack of an equity focus—and resulted in a substantial change to the policy text.

ORIGINAL TEXT

Please describe specific programmatic or institutional goals set by the participants in this application and how achieving these goals ultimately will increase the number of bachelor’s degrees awarded, allow students to complete bachelor’s degrees within four years, and/or ease transfer. Please describe when and how these goals were developed and how they are used on an ongoing basis.

WHAT CUE PROPOSED

Please describe specific programmatic or institutional goals set by the participants in this application and how achieving these goals ultimately will increase the number of bachelor’s degrees awarded, allow students to complete bachelor’s degrees within four years, and/or ease transfer. Please specifically discuss how programmatic and institutional goals will close equity gaps in degree attainment for low-income, immigrant, and racial/ethnic groups. Please describe when and how these goals were developed and how they are used on an ongoing basis.

FINAL APPLICATION TEXT

Please describe specific programmatic or institutional goals set by the participants in this application and how achieving these goals ultimately will increase the number of bachelor’s degrees awarded, allow students to complete bachelor’s degrees within four years, and/or ease transfer, particularly for student groups that are underrepresented in higher education. Please describe when and how these education goals were developed and how they are used on an ongoing basis.
PART TWO: EQUITY-MINDED POLICY INDICATORS

In order for states to be in a position to truly advance the postsecondary success of all students, their higher education policies should adhere to the equity-minded indicators outlined below. Understanding and reviewing for these indicators should be part of each state’s policy review protocol. The examples in this section represent actual application of these principles in state policy.

1. EQUITY-MINDEDNESS SHOULD BE A GUIDING PARADIGM FOR POLICY DESIGN

Equity-mindedness can be defined as framing the success of underserved and underrepresented students as an institutional and state responsibility. One of the qualities of equity-mindedness includes being color-conscious in a critical sense, which entails understanding inequalities experienced by racial, ethnic, and indigenous communities in the context of a history of exclusion, discrimination, and segregation.

Examples:

Oregon—“The Equity Lens will confirm the importance of recognizing institutional and systemic barriers and discriminatory practices that have limited access for many students in the Oregon education system. The equity lens emphasizes underserved students, with a particular focus on racial equity. The system outcomes will focus on resource allocation, overall investments, hiring and professional learning.”

- Oregon Education Investment Board, Equity Lens (2014)

Colorado—“Our colleges and universities are enrolling increasing numbers of students who come from low-income families and who will be the first in their family to attend college, and increasing proportions of enrolled students represent communities historically underserved by colleges and universities, particularly the Hispanic/Latino community.”

- Colorado Competes (2012)
2. EQUITY IN LANGUAGE

Attention to bias in language is necessary to craft equity-minded policy, because it is an important aspect of how individuals and groups are viewed and represented. Policymakers should be attentive to language that reinforces stereotypes based on race, gender, income, and language.

• Words can communicate cultural assumptions about the educational preferences of African Americans, Latinos, and Native Americans; biases about the value of certificates vs. longer-term college degrees; assumed values of commuter campus vs. residential students; and other problematic assumptions.

• Words that describe the beneficiaries of a policy as “ideal,” “motivated,” or “well-prepared” students could reproduce racial and class-based inequities if affluent white students are more likely to meet the qualifying criteria.

• With increasing diversity, there has been a proliferation of terms such as “underrepresented,” “disadvantaged,” “at-risk,” and “minority”—which tend to divest individuals of their unique identities. Terms that aggregate all nonwhite groups into a single category can prevent policymakers from noticing important patterns of success and failure. Naming populations specifically is a better practice than discussing racial, ethnic, or indigenous groups without naming them. Policy targeting a specific group or groups is more effective, in terms of clarity and creating conditions for action, when the language used is specific (e.g., White rather than “better served populations,” and Black/Latino rather than “less well-served populations”).

Example:

Texas—“Increase the higher education participation rate for the Black population of Texas from 4.6 percent to 5.1 percent by 2005, to 5.4 percent by 2010, and to 5.7 percent by 2015.”


1 Goal clearly identifies student group.

2 Target is specific—listing the specific targets and the time frame.
3. DATA COLLECTION AND REPORTING STRATEGY

The practice of routinely disaggregating data by race and ethnicity is a basic requirement of equity-focused policy planning and development. The aggregation of students into categories such as “underrepresented,” “at-risk,” “underserved,” or “minority” hides differences across groups. The practice of disaggregating data by race and ethnicity should be systematic. Too often, reports, master plans, and strategic plans lack consistent practices in reporting data by race and ethnicity. For example, it is common to provide enrollment data disaggregated by race and ethnicity, but much less common to do so on outcome indicators such as on-time graduation or degree-attainment by field.

Example:

**Indiana**—The state pledged to “annually publish the college completion rates for student demographic groups and highlight successful strategies for closing the achievement gap” as part of their new college completion report.

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**The Completion Gap**

![Completion Rate Table]


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1 Disaggregated reporting supports more effective policy evaluation and accountability.
4. DISPROPORTIONATE IMPACT

The criteria, premises, and intent of policy must be evaluated to safeguard against disproportionate impact. This occurs when a policy unintentionally affects some groups differently because of characteristics of those groups secondary or “exogenous” to the primary policy mechanism.

For example, a policy that requires all developmental education to be delivered in community colleges may divert Black, Latino, and low-income students from four-year institutions. While the policy does not specifically target these populations, these students tend to be overrepresented among those required to enroll in developmental education. By implementing such a policy, higher numbers of Blacks, Latinos, and other racially and ethnically marginalized populations will be unintentionally forced into community colleges.

As another example, a “guaranteed transfer policy” for full-time community college students would likely disproportionately disadvantage students of color, low-income students, adult students, and others who are more likely to attend part-time. Policies that target full-time or part-time students do not inherently identify racial, income, or age groups, yet those students are disproportionately impacted. An important equity-focused practice is to intentionally consider whether populations that have been historically underserved would accumulate additional disadvantages based on criteria that determine the beneficiaries of policies. If disproportional impact is identified, actions should be taken to consider how to properly amend the policy. For example, the Wisconsin Board of Regents expanded transfer policies available to University of Wisconsin students to also cover Wisconsin Technical College System students after the disparate impact of the previous policy was called to the Board’s attention.

5. POLICY CONSISTENCY AND UBIQUITY

A lack of consistency and ubiquity of an equity focus can undermine good policy intentions. For example, a state may develop a strategic plan that accounts for the projected growth among Hispanic/Latino high school students, providing detailed action items to increase access to postsecondary education for this population (i.e., Gear Up, summer bridge, minority pal mentoring, etc.). However, the section outlining the state’s completion and attainment goals only lists indicators in the aggregate, leaving it unclear how the success of Hispanic/Latino students is expected to contribute to overall goals. Increased access is an essential aspect of the college attainment agenda; however, specifying access goals for Latinos without corresponding goals for completion will not advance the college attainment agenda. A consistent and ubiquitous equity focus across policy is critical to creating conditions for effective institutional action, evaluation and accountability.
6. HOW EQUITY IS FRAMED MATTERS

The way in which policymakers frame and rationalize the need for equity is critical to gaining broad buy-in and effective stakeholder responses. Below are three common strategies states have used effectively to frame the “equity imperative.”

**ECONOMIC GROWTH, WORKFORCE DEMAND, AND STATE RETURN ON INVESTMENT**

The need to ensure the state’s economic viability is the most common and compelling rationale for incorporating an equity focus in postsecondary plans. Leaders recognize that reaching attainment goals helps to maintain a skilled workforce and to grow long-term per capita income and state revenues. This “return on investment” (ROI) rationale can be employed to garner support for policy advancing postsecondary attainment from the business community and legislators. It advances equity as a pragmatic and obvious strategy for growing overall human capital in the state.

**DEMOGRAPHIC CHANGE**

Demographic shifts in nearly every state indicate that traditional college-going populations are increasingly likely to be non-white. Related to the economic growth rationale—but distinct in terms of the emphasis on the need to respond to shifting demographics—many states have found it effective to frame a focus on equity within a clear presentation of data showing demographic change. This rationale puts forward the idea that the state must help diverse populations enter and succeed in postsecondary education—not just to ensure economic growth, but because the very composition of the state is changing.
States may use data representations similar to this chart showing that over time the Latino population is growing and increasingly is a larger share of the state population.

Source: Dowell Myers, Professor and Director of Population Dynamics Research Group, Sol Price School of Public Policy, University of Southern California. Based on census data and projections by the California Department of Finance.

**EQUAL OPPORTUNITY AND MORAL IMPERATIVE**

Some state plans note the obligation of state government to give all individuals the opportunity to succeed—a rationale that draws on the narrative of the American Dream and principles of equal opportunity. Others reference an implicit moral imperative for addressing equity. Such rationales may point to the relationships between postsecondary attainment and poverty, access to healthcare, housing, and other factors.

**Example:**

**EQUITY RATIONALE BASED ON ECONOMIC GROWTH AND STATE ROI.**

**Oregon**—“Oregon faces two growing opportunity gaps that threaten our economic competitiveness and our capacity to innovate. The first is the persistent achievement gap between our growing populations of communities of color, immigrants, migrants, and low-income rural students with our more affluent white students. While students of color make up over 30% of our state — and are growing at an inspiring rate — our achievement gap has continued to persist. As our diversity grows and our ability to meet the needs of these students remains stagnant or declines, we limit the opportunity of everyone in Oregon. The persistent educational disparities have cost Oregon billions of dollars in lost economic output and these losses are compounded every year we choose not to properly address these inequalities.”

—Oregon Education Investment Board, Equity Lens (2014)
Example:

**EQUITY RATIONALE BASED ON DEMOGRAPHIC CHANGE**

**Maryland**—“The State’s changing demography influences most of the goals included in Maryland Ready. These changes will force the State and all Maryland’s postsecondary institutions to examine their outreach and recruitment strategies, teaching and instruction methods, financial aid systems, academic support services, and use of technology. In many ways the State’s future social and economic outlook is dependent upon how well postsecondary institutions adapt to the changing demography and educate and support these populations. It is critical that Maryland colleges and universities adjust current philosophies, practices, and policies to accommodate students who are less white, less affluent, and of nontraditional age.”

-Maryland Ready. 2013-2017 Maryland State Plan for Postsecondary Education

Example:

**EQUITY RATIONALE BASED ON A PROMISE OF EQUAL OPPORTUNITY**

**Colorado**—“Nevertheless, important challenges lie ahead, and failure to meet them may result in disintegration of a system built upon the bold, uniquely American foundational belief that all citizens, from military veterans to low-income inner-city youth, deserve the opportunity to improve their station in life through education.”

-Colorado Competes (2012)
PART THREE: POLICY REVIEW PROMPTS

Each of the six indicators represents a key aspect of an equity-minded approach. Those evaluating postsecondary policy and goals should use the following questions to determine whether the language thoroughly achieves an equity focus.

1 EQUITY-MINDEDNESS AS THE GUIDING PARADIGM FOR POLICY
   • Does the policy position participation and success of students from racial, ethnic, and indigenous communities historically underserved by higher education as a state and institutional responsibility?

2 EQUITY IN LANGUAGE
   • Are biased or stereotypical assumptions made about students within the policy?
   • 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 underserved by higher education?
   • Are student groups clearly identified (e.g., African American/Black, Hispanic/Latino, Native American, Alaskan Native, Asian American/Pacific Islander, White)?

3 DATA COLLECTION AND REPORTING STRATEGY
   • Are data collected and reported by racial group (e.g., African American/Black, Hispanic/Latino, Native American, Alaskan Native, Asian American/Pacific Islander, White)?
   • Is disaggregation practiced across different reporting mechanisms and incorporated consistently into policy evaluation, accountability, institutional reporting, etc.?

4 DISPROPORTIONATE IMPACT
   • Could the policy cause disproportionate impact to specific groups based on other factors related to educational disadvantage, such as attendance patterns, residential vs. non-residential, participation in advanced college-prep curricula, etc.?
   • Does the policy design build in safeguards to protect against potential negative effects on equity in access or success (for example, evaluation of impact using disaggregated data)?
   • Who will benefit from the policy?
   • Who will be excluded?
   • Who is not eligible?
5 POLICY CONSISTENCY AND UBIQUITY

- Are the needs of students from racial, ethnic, and indigenous communities consistently included in the policy? (e.g., are Alaska Natives targeted in access AND completion goals?)

- Are the same disaggregated indicators used in planning, evaluation, accountability, institutional reporting requirements, etc.?

6 EQUITY FRAMING

- Have data been collected and analyzed to clearly show trends in educational and workforce needs, demographic shifts, etc.?

- Is the case for equity framed on the basis of economic well-being, demographic shifts, and/or moral imperative in order to speak to a broad base of stakeholders across sectors?
POLICY REVIEW WORKSHEET
EQUITY-MINDED POLICY PRACTICES

Directions:
In small groups, use the equity-focused policy prompts and the instructions below to assess the policy excerpts that follow.

Detach:
A duplicate “Prompts for Reviewing Policy for Equity” list is included at the end of this protocol (page 31). Detach that page and reference it while completing the activity.

Read:
Read the sample policy excerpts.

Annotate:
While reading through each of the policy excerpts, annotate the text using the following guides.
1. Circle the words, phrases, or content that denote equity.
2. Underline text that does not explicitly identify equity for racial, ethnic, and indigenous populations.
3. Place an asterisk* by underlined text, or other noteworthy text, and add sample text that would embed equity into the policy.

Complete:
Complete the discussion worksheet that follows each policy example, referencing the “Prompts for Reviewing Policy for Equity” list (page 31). Note your answers in the space provided. Not all categories will be applicable to each policy example.

Discuss:
Discuss your answers to the questions with the members of your group. Compare your annotation of the text, and read aloud your answers to the questions. Discuss any difference between group members’ answers.
### SAMPLE: ANNOTATED POLICY EXCERPT

Sample 1: Please provide a statistical profile of the students you serve* and an analysis of the factors that** impact the ability of your students to earn bachelor’s degrees, graduate within four years, and/or transfer. Please note which factors you believe can be impacted by changes to policies, practices, or systems.

Sample 2: Please describe specific programmatic or institutional goals set by the participants in this application and how achieving these goals ultimately will increase the number of bachelor’s degrees awarded, allow students to complete bachelor’s degrees within four years, and/or ease transfer.*** Please describe when and how these goals were developed and how they are used on an ongoing basis.

Example:

### EXAMPLE EXCERPT DISCUSSION:

**USING THE PROMPTS AS A GUIDE, IDENTIFY IN WHAT WAYS THE POLICY EXCERPT REFLECTS AN EQUITY PERSPECTIVE?**

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<th>Equity-Mindedness as the Guiding Paradigm for Policy:</th>
<th>Disproportionate Impact:</th>
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<tbody>
<tr>
<td>S1 - The student group is not explicitly stated</td>
<td>S1 - Asking to identify factors</td>
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<td>S1 - No mention of race or institutional responsibility</td>
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<th>Equity in Language:</th>
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<td>S2 - Biased about who can and cannot</td>
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<td>S2 - Student groups are not identified</td>
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<th>Data Collection and Reporting Strategy:</th>
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FROM THE PROMPTS ON PAGE 18, WHAT IS MISSING IN THE POLICY EXCERPT?

* add “disaggregated by race and ethnicity”

** change from “the factors that” to “how institutional racism”

**** add “Please specifically discuss how programmatic and institutional goals will close equity gaps in degree attainment for low-income, immigrant and racial/ethnic groups.”

IS IT A STRONG OR WEAK REPRESENTATION OF EQUITY-FOCUSED POLICY? WHY?

Both excerpts are weak representations of equity-focused policy because they do not explicitly measure equity in relation to access, outcomes and opportunities.
POLICY EXCERPT #1

The following policy excerpt is from a state’s strategic plan, which outlines its attainment goal and detailed plan through 2020.

“Further, by 2020, the number of White high school graduates (whose overall college participation and completion rates are significantly higher than those for students of color) will decline by 15 percent. While the ranks of Asian/Pacific-Islander and Latino/a students continue to grow, their numbers aren’t increasing fast enough to offset this decline. Getting more students into college and through to graduation—particularly African-American and Latino/a students—isn’t just a matter of social justice. It’s also an economic imperative for the state. Consider this: If African-American and Latino/a adults possessed college degrees at the same rate as White adults (60%), the state would easily meet its need for more college graduates by 2025.”

EXCERPT #1 DISCUSSION:

USING THE PROMPTS AS A GUIDE, IDENTIFY IN WHAT WAYS THE POLICY EXCERPT REFLECTS AN EQUITY PERSPECTIVE?

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FROM THE PROMPT ON PAGE 20, WHAT IS MISSING IN THE POLICY EXCERPT?

IS IT A STRONG OR WEAK REPRESENTATION OF EQUITY-FOCUSED POLICY? WHY?
POLICY EXCERPT #2

The following excerpt is from a large state university system’s strategic plan that includes five goals to achieve over a five-year period. The plan makes four pledges to the citizens of the state: to ensure “academic excellence and the opportunity for success for all students,” to provide value for students and the state, to offer solutions to the state’s biggest challenges, and to foster “connection and engagement” with state communities. Each pledge is accompanied by several related promises. Listed below is one of the promises under their commitment to “academic excellence and the opportunity for success for all.”

“The University commits to the people of [state name]:

  Academic excellence and the opportunity for success for all students
  
  • We will admit and educate students who are academically prepared to succeed
  
  • We will equip students for lifelong learning by providing a high-quality, rigorous education to develop students with the knowledge, skills, and integrity needed to become engaged citizens;”

EXCERPT #2 DISCUSSION:

USING THE PROMPTS AS A GUIDE, IDENTIFY IN WHAT WAYS THE POLICY EXCERPT REFLECTS AN EQUITY PERSPECTIVE?

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FROM THE PROMPT ON PAGE 22, WHAT IS MISSING IN THE POLICY EXCERPT?

IS IT A STRONG OR WEAK REPRESENTATION OF EQUITY-FOCUSED POLICY? WHY?
POLICY EXCERPT #3

The following excerpt is from a state-legislated Guaranteed Assistance Program.

“The purpose of the [state name] Guaranteed Assistance Program is to provide an incentive to financially needy students now attending elementary and secondary school in [state name] to raise their expectations and their academic performance and to consider higher education an achievable objective in their future. The law requires that the awards to undergraduates be proportional to need so that the students with the greatest need receive the largest awards.

In order for an undergraduate student to be eligible for an award, a student must:

- Be admitted into a [state name] public two or four-year college or university;
- Be enrolled full-time in an approved degree, certificate, or diploma program;
- Be a domiciliary resident of [state name] as defined by the Code of [state name] §23-7.4;
- Be a U.S. citizen or eligible noncitizen;
- Demonstrate financial need as determined by the institution;
- Graduate from a [state name] high school or complete a program of home school instruction in accordance with § 22.1-254.1 (students who obtain a GED are not eligible);
- Have at least a cumulative high school grade point average of 2.5 on a 4.0 scale (or its equivalent);
- If a home school completer: achieve a SAT verbal and math combined score of at least 900 or ACT Composite score of at least 19; and be classified as a dependent student for federal financial aid purposes.

Awards may be renewed for up to three additional years provided that the student:

1. Maintains continuous full-time enrollment;
2. Earns at least 24 credit hours during the previous award year;
3. Maintains domiciliary residency in [state name];
4. Demonstrates continued financial need;
5. Maintains a college grade point average of at least 2.0 on a 4.0 scale, or its equivalent; and
6. Maintains the satisfactory academic progress standards of the institution for federal student aid programs.”
**EXCERPT #3 DISCUSSION:**

*Using the prompts as a guide, identify in what ways the policy excerpt reflects an equity perspective?*

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From the prompt on page 24, what is missing in the policy excerpt?

Is it a strong or weak representation of equity-focused policy? Why?
**POLICY EXCERPT #4**

The following policy excerpt is from a state's strategic plan, which outlines its attainment goal and detailed plan through 2017.

“In many ways the State’s future social and economic outlook is dependent upon how well postsecondary institutions adapt to the changing demography and educate and support these populations. It is critical that the State’s colleges and universities adjust current philosophies, practices, and polices to accommodate students who are less white, less affluent, and of nontraditional age.”

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**EXCERPT #4 DISCUSSION:**

**USING THE PROMPTS AS A GUIDE, IDENTIFY IN WHAT WAYS THE POLICY EXCERPT REFLECTS AN EQUITY PERSPECTIVE?**

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<th>Equity-Mindedness as the Guiding Paradigm for Policy:</th>
<th>Disproportionate Impact:</th>
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<td><strong>Data Collection and Reporting Strategy:</strong></td>
<td><strong>Equity Framing:</strong></td>
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FROM THE PROMPT ON PAGE 26, WHAT IS MISSING IN THE POLICY EXCERPT?

IS IT A STRONG OR WEAK REPRESENTATION OF EQUITY-FOCUSED POLICY? WHY?
POLICY EXCERPT #5

The following excerpt is from one state’s newly developed Governor’s Awards for Innovation in Higher Education. The money was allocated through the 2014 Budget Act, with the goal of providing additional funds to colleges and universities to support initiatives that colleges have put in place to resolve the challenges of inequality in degree completion, exceedingly low remedial course success rates, and stagnant transfer rates. This award provides colleges and universities an incentive for comprehensive reforms that are internally driven and have gained momentum within institutions.

The background information states that the Innovation Awards in Higher Education “…recognizes [state name] community colleges, State University campuses, and University of [state name] campuses that change existing policies, practices, or systems to achieve the following priorities:

• Significantly increase the number of bachelor’s degrees awarded.
• Allow students to complete bachelor’s degrees within four years after beginning higher education.
• Ease transfer through the state’s education system by better recognizing learning that occurs across the state’s education segments and elsewhere.”

The award also requests several items that colleges and universities are required to include with their application. One of the items required is listed below.

10. Please list your target outcomes for each academic year through 2018-19 for the measures identified in your response to Item 9, taking into account the changes described in this application. Please provide the most recent baseline measures for each target outcome for each application participant and identify which academic year that data reflects. You may use a table to reflect this data. Please also provide a narrative that explains how you chose your targets, including assumptions used and evidence you have to support those assumptions. Please identify your data source or provide enough information about how the data is generated to allow other entities to replicate the measures. (2 pages maximum, including any table produced. You may include additional supporting materials in an appendix labeled Appendix G, limited to 10 pages maximum.)"
EXCERPT #5 DISCUSSION:

**USING THE PROMPTS AS A GUIDE, IDENTIFY IN WHAT WAYS THE POLICY EXCERPT REFLECTS AN EQUITY PERSPECTIVE?**

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FROM THE PROMPT ON PAGE 28, WHAT IS MISSING IN THE POLICY EXCERPT?

IS IT A STRONG OR WEAK REPRESENTATION OF EQUITY-FOCUSED POLICY? WHY?
PROMPTS FOR REVIEWING POLICY FOR EQUITY

EQUITY-MINDEDNESS AS THE GUIDING PARADIGM FOR POLICY

• Does the policy position participation and success of students from racial, ethnic, and indigenous communities historically underserved by higher education as a state and institutional responsibility?

EQUITY IN LANGUAGE

• Are biased or stereotypical assumptions made about students within the policy?
• 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 underserved by higher education?
• Are student groups clearly identified (e.g., African American/Black, Hispanic/Latino, Native American, Alaskan Native, Asian American/Pacific Islander, White)?

DATA COLLECTION AND REPORTING STRATEGY

• Are data collected and reported by racial group (e.g., African American/Black, Hispanic/Latino, Native American, Alaskan Native, Asian American/Pacific Islander, White)?
• Is disaggregation practiced across different reporting mechanisms and incorporated consistently into policy evaluation, accountability, institutional reporting, etc.?

DISPROPORTIONATE IMPACT

• Could the policy cause disproportionate impact to specific groups based on other factors related to educational disadvantage, such as attendance patterns, residential vs. non-residential, participation in advanced college-prep curricula, etc.?
• Does the policy design build in safeguards to protect against potential negative effects on equity in access or success (for example, evaluation of impact using disaggregated data)?
• Who will benefit from the policy?
• Who will be excluded?
• Who is not eligible?

POLICY CONSISTENCY AND UBIQUITY

• Are the needs of students from racial, ethnic, and indigenous communities consistently included in the policy? (e.g., are Alaska Natives targeted in access AND completion goals?)
• Are the same disaggregated indicators used in planning, evaluation, accountability, institutional reporting requirements, etc.?

EQUITY FRAMING

• Have data been collected and analyzed to clearly show trends in educational and workforce needs, demographic shifts, etc.?
• Is the case for equity framed on the basis of economic well-being, demographic shifts, and/or moral imperative in order to speak to a broad base of stakeholders across sectors?

Remove this page for easy reference as you complete the activity
Since 1999, the Center for Urban Education (CUE) has led socially conscious research and developed tools to help institutions of higher education produce equitable student outcomes. Located in the University of Southern California’s Rossier School of Education, CUE is committed to closing racial-ethnic equity gaps and improving student outcomes in higher education. Rather than remediate students, CUE remediates practices, structures, and policies.