ECU



UNC POLICY MANUAL 300.8.5 2025 CERTIFICATION & REPORT

2025 CERTIFICATION & REPORT EQUALITY WITHIN THE UNIVERSITY OF NORTH CAROLINA August 28, 2025

Peter Hans, President University of North Carolina System 223 S. West St., Ste. 1800 Raleigh, NC 27603

Dear President Hans:

The University of North Carolina Board of Governors adopted Section 300.8.5 of the UNC Policy Manual, *Equality Within the University of North Carolina*, on May 23, 2024, to reaffirm the University's longstanding commitment to equality.

As such, the chancellor and director of student affairs (or equivalent officer) of each constituent institution must certify and report annually on his or her constituent institution's initial and continued compliance with Section 300.8.5¹.

As such, I certify the following on behalf of my constituent institution:

- I. I certify that East Carolina University fully complies with the University's commitment to institutional neutrality and nondiscrimination required by law and Section 300.8.5 of the UNC Policy Manual.
- II. My institution continues to act consistently with the actions described in our 2024 Annual Certification & Report and the certifications contained there remain true, noting the following additional or modified actions, including additional savings reallocated towards student success, if any:

Consistent with the information provided in ECU's 2024 Annual Certification, and following elimination of positions identified, funding reserves for those positions have

¹ The Equality Policy requires annual certification as to compliance and initially expected reports of savings derived from achieving compliance. It is likely that any savings achieved would have occurred in the first year and that succeeding annual certifications will identify fewer additional savings in succeeding years (because non-compliant programs, employment divisions, and employment positions should be addressed completely in the first year and remain addressed). However, in instances where campuses have determined—following the initial certification—that additional programs need to be brought into compliance with the Equality Policy, reallocated savings should be reported in the subsequent certification.

been eliminated and saving from these eliminations are to be allocated as part of ECU's FY26 budget reductions, resulting in a total savings of \$149,423.

III. To achieve further compliance, my institution has taken the following additional concrete actions towards compliance with the Equality Policy since the last Annual Certification & Report:

Training the Campus Community:

An online course entitled "Equality Within the University of North Carolina: Nondiscrimination, Institutional Neutrality, Compelled Speech, and Prohibited Concepts" was launched in August 2024 to provide training and resources to the ECU community, available to all ECU employees (via Cornerstone, login required). This course provides an overview of the concepts related to the Policy, specifically regarding nondiscrimination, institutional neutrality, compelled speech, and prohibited concepts. Additional training modules were also updated, including training for search committee members (required for those serving on EHRA search committees, recommended for those serving on SHRA/CSS/DMSS search committees). The training includes information about (1) the prohibition on compelled speech (slides 9-10) and (2) formulating interview questions in compliance with the compelled speech prohibition (slides 18-21).

Leadership Communications

In the fall of 2024, Chancellor Rogers set expectations with ECU leadership and respective Vice Chancellors communicated with their various divisional leadership and professional staffs to encourage review of information and FAQs and/or trainings related to the UNC System Policy Section 300.8.5 and ECU's FAQs/Understanding the UNC System's Equality Policy. In follow-up during the 2024-2025 Academic Year, the Chancellor's Executive Council disseminated a message to the campus community dated March 13, 2025, providing reminders and updates regarding: (1) Institutional Neutrality and Free Speech, (2) Political Activities of Employees, and (3) a Compliance Update which included efforts to comply with the Equality Policy.

Website and Webpage Review

Shortly after the adoption of the Equality Policy, ECU engaged in a full review of its web presence by undertaking a review of its webpages and URL's. This work included the development of keywords for use in a web scan to identify potential pages and sites for compliance review. Pursuant to this project, ECU updated its webpage and sites to conform with the changes arising from the Equality Policy in the summer of 2024. In the spring of 2025, Chancellor Rogers directed University staff to conduct an additional review of all administrative institutional webpages using available

technology or analytics tools to uncover outdated language that could be perceived as non-compliant. This follow-up review in the spring semester of 2025 included a keyword search and manual review of at least 4,756 URLs/webpages.

During this review, all URLs/webpages with keywords were again reviewed by the responsible division, with teams assigned for manual review of all pages with keyword(s) reference. The review largely confirmed the effectiveness of the summer 2024 review, with some changes identified and routed to deans and other senior leadership for additional consideration. Historical items with a notation of News Services, East Magazine, or an archive of either, required no action, and leadership, in coordination with the Chief Communications Officer, continue to evaluate the operational access to these historical items. Some updates made during the Spring 2025 review included, but are not limited to, changes to ECU's free speech and resources webpage to remove references to outdated Faculty Manual pages and hyperlinks, updates to the leadership descriptor on the Centennial Awards page, revisions to confirm affinity groups from Advancement pages, and removal of any remaining outdated scholarship references. For example, webpages were confirmed to remove reference to previous scholarships advertised for underserved populations or language that may have reflected proxies for race/ethnicity.

Some additional examples of revised language include instances where "commitment to diversity and equity" language was updated and/or the removal of outdated pages related to DEI resources on campus. In Academic Affairs, discontinued content included websites for faculty affinity groups focused on topics addressed in the Equality Policy (BSOM and THCAS), removal of metrics associated with diversity-related mission and organizations owned by women or people of color (COB), removal of references to now-altered or discontinued scholarships or programs with DEI focus (COB), and removal of old content including announcements, blog posts, assessment and annual reports, and library-sponsored conference programming (ALS). In Student Affairs, the most significant updates were made because of the elimination of the Intercultural Affairs Department. Most of the other changes were based on keyword search terms and removal of any "advocacy" based language.

The Administration and Finance Division reviewed the webpages with the most significant updates made to POSO and Sustainability websites. The POSO webpage needed a refresh from the consolidation of OED, personnel administration and Human Resources department to eliminate the OED office and information. The Sustainability website included resources available to students, and the webpage has been modified to include Health and Wellbeing. Further, University Advancement made changes to any foundation funds that did not align with the institution's Equality Policy, and in some cases, they were removed from institutional websites.

Additionally, updates were made to ensure all outward-facing materials are consistent with institutional values and compliance requirements.

Review of Programs and Activities, Including Mission Statements and Objectives Since 2024, ECU has engaged in continuous review and refinement of its programs and activities, mission statements, policy manuals, and objectives. Since the Policy's adoption, ECU has reviewed the University Policy Manual (UPM) and updated its Policies, Regulations and Rules (PRRs) to reflect necessary compliance changes. This included updates to reflect the realignment and consolidation of the Department of People, Operations, Success, and Opportunity (POSO), changes to the Notice of Nondiscrimination (removal of affirmative action obligations upon elimination of prior Executive Order No. 11246), updates to ECU's Delegations of Contracting authority. among others. During the 2024-2025 Academic Year, ECU Faculty expediated review of the ECU Faculty Manual to remove outdated policy references, including repealed version of 300.8.5, and to remove or replace with current equality policy language. with final approval by Faculty Senate on February 25, 2025. In Spring 2025, the Provost's office guided several processes toward ensuring compliance with the Equality Policy and subsequent System Office directives across the Division of Academic Affairs, including updates to the Academic Unit codes with transition to provisional status during review period.

Academic Unit Codes

The Provost worked closely with the Office of University Counsel and the Chair of the Faculty to ensure compliance in the guiding documents for units within a college (or in some cases, the entire college itself), known as Unit Codes of Operation. OUC advised the Division of Academic Affairs by reviewing Unit Codes for language not in compliance. As agreed upon by administrative and faculty leadership, each unit code was officially revised for compliance as needed and those were put into a provisional state via Faculty Senate action at their February 25, 2025 meeting with subsequent Chancellor approval on March 7, 2025. Units will continue to go through the regular process to address the provisional state necessitated by these changes. Leadership, including faculty senate leaders, continue to monitor and engage in due diligence in the review of unit code development.

Student Centers

The Dr. Jesse R. Peel LGBTQ Center, the Ledonia Wright Cultural Center, and the Women and Gender Center significantly adjusted the funding, programming, and governance such that the majority of each center's programming transitioned to be led, developed, and implemented by students and/or student organizations, with the development of a student led committee allocating the majority of the respective center's programming dollars. Each center's programming, services and facilities

continue to be open to all students and focused on student enrichment activities that support student success.

Review of Fund Agreements

The Division of University Advancement reviewed approximately 4,900 gift fund agreements focused on keyword searches, resulting in updates to approximately 75 agreements. The nature of these updates included working with the donor(s) and/or department(s) to revise the fund agreement language to reflect current terminology and align with the institution's Equality Policy. Approximately 15 funds were closed or no longer accepting donations due to a change in the area in which the funds support, a donor requested refund, or the inability to update the language to align with the institution's Equality Policy. These updates were made to ensure all outward-facing materials and internal documentation are consistent with institutional values and compliance requirements. This work is ongoing as donors continue to respond to our requests to update their funds.

Curricular and Programmatic Review & The Development of Waivers

On February 5, 2025, in response to an Executive Order dated January 21, 2025, the System Office issued a memo regarding "mandatory curricular and program requirements on prohibited topics discussed in the Jan. 21 EO." This memo suspended, as of February 5, "all general education requirements and major-specific requirements mandating completion of course credits related to diversity, equity, and inclusion..." At ECU, this meant that the Global Diversity and Domestic Diversity graduation requirement, a six-hour graduation requirement designed by the faculty in 2012 to widen the aperture through which our students viewed the world and to help prepare them to succeed in a global society, was immediately removed and the students registered for courses with that designation had to be allowed to withdraw without penalty. Of the 13,727 students who were registered in those courses, 21 of them chose to withdraw.

Additionally, the February 5th Memo directed Chancellors to develop waivers for any major-specific requirements in which DEI content is "substantially related" to the major. Provosts were also directed to "work using existing curricular and program development processes to implement long-term solution for complying with the Jan. 21 EO." To that end, ECU began the process of examining the entire catalog for places in the curriculum, which had been thoughtfully developed and carefully curated by expert faculty over many years to provide our students with the most rigorous and compelling learning opportunities, for places which might require them to interact with DEI concepts. Given the scope of our catalogue and the sheer size of the task, the decision was made to utilize keywords to assist in the review.

Any "hits" from the keyword search were reviewed by the departments. department had the opportunity to either add an elective, making the DEI related course optional, remove the course, or seek a waiver if the material was considered "substantially related" to the major. In the end, the Registrar's Office scanned a total of 504 pages including 279 degrees and certificates, 87 minors, 63 college and departmental pages in the undergraduate catalog, and 75 college and departmental pages in the graduate catalog. This process, completed roughly one month after the February 5 Memo, resulted in 7 undergraduate program revisions, 1 graduate program revisions, 2 minor program of study changes, 1 undergraduate certification program revision, 2 graduate certificate program revisions, 1 graduate add-on licensure program change, 1 course revision, and 11 editorial changes to the catalogue. In addition, the Chancellor reported to the System Office waivers for: the Bachelor's and Master's degrees in Social Work, Teacher Licensure Programs in the College of Education, and the BS in Special Education Adapted Curriculum and General Curriculum, as well as three optional certificates in the College of Education. These waivers were presented to the Board of Governors on April 14.

As a state entity, ECU is committed to compliance with all University of North Carolina System policies, regulations, and standard operating procedures. Through its compliance efforts, ECU engaged in a thoughtful and meaningful approach to the review of its many programs and activities, as well as online content and resources, to provide timely implementation of various updates impacted by the Policy. ECU also remains committed to taking prompt and direct action to address any compliance concerns in the future.

IV. To further monitor and assess our compliance, my institution's Board of Trustees established the subcommittee identified below and held meetings on the following dates and locations to discuss our institution's Equality Policy compliance:

On July 10, 2025, ECU's Board of Trustee held a meeting to elect its officers and establish its Equality Policy Compliance Subcommittee. On July 15, 2025, ECU Board of Trustee Chair Cassandra Burt sent notice to President Hans of her intent to be appointed along with Tom Furr, Dave Fussell, Scott Shook and Van Isley to the Equality Policy Compliance Committee. These appointments were approved by President Hans on July 16, 2025.

On August 7, 2025, the first meeting of the Equality Policy Compliance Subcommittee was held at ECU's Main Campus Student Center. At this meeting, Chair Burt

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reported that the committee heard an in-depth report from ECU's senior leadership on campus operations and realigned offices, position responsibilities for those realigned roles, all trainings that were provided to campus regarding Equality Policy implementation. The Committee received further report on updated webpages, mission statements for programs, curriculum, and objectives that comply with the university commitment to institutional neutrality. Chair Burt also stated that the committee would meet again in special session later in August as a next step.

On August 27, 2025, the Equality Policy Compliance Subcommittee met in a special called meeting to review, in consultation with the Chancellor, ECU's draft 2025 Annual Certification of Compliance with 300.8.5, and also received a limited closed-session briefing regarding the performance of employees in positions identified in ECU's 2024 certification as those realigned into different positions or assigned different duties in compliance with 300.8.5 to provide meaningful verification of university realignment with the policy.

[INSERT YOUR CONSTITUENT INSTITUTION'S NAME]

Title: Chancellor	Title: Vice Chancellor of Student Affair
By: The top	By: The state of t
Name:_Dr. Philip Rogers	Name: Dr. Brandon Frye
Date: <u>8/28/25</u>	Date:8/28/25

