UNCW



UNC POLICY MANUAL 300.8.5 2025 CERTIFICATION & REPORT

2025 CERTIFICATION & REPORT EQUALITY WITHIN THE UNIVERSITY OF NORTH CAROLINA August 29, 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 the University of North Carolina at Wilmington 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:

UNCW continues to operate in a manner consistent with the actions described in our 2024 Annual Certification & Report. Since that submission, the following additional actions and

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.

modifications have been implemented to strengthen compliance and identify additional savings.

Staff Realignment and Role Redesign

Following the closure of the Office of Institutional Diversity and Inclusion (OIDI), UNCW reassigned 13 affected permanent employees into newly created positions within both Academic Affairs and Student Affairs or into existing campus vacancies. These reassignments were guided by three core principles: (1) compliance with the Equality Policy, (2) continuity of student support, and (3) care for permanent staff. In accordance with state policy, SHRA (non-at-will) employees were offered reassignment opportunities to positions where their experience aligned with institutional needs through the university's approved Reduction-in-Force (RIF) plan, which prioritized minimizing disruption and facilitating internal transfers. The UNC System formally approved the RIF plan, affirming the university's approach to managing these transitions. In line with UNCW's historical practice for EPS (atwill) employees impacted by job reductions, internal opportunities were also identified for atwill staff affected by the OIDI closure.

New positions were intentionally designed to remove any responsibilities related to institutional advocacy or identity-based programming. The previously vacant roles filled by former OIDI staff had no connection to DEI-related programming or advocacy. These positions were unrelated to any duties restricted under the Equality Policy. Every reassigned employee received a newly developed job description that eliminated functions related to prior DEI work. Ongoing supervision, targeted divisional training, and the use of programming checklists rooted in UNC System Policy 300.8.5 ensure compliance in day-to-day operations. These structural and procedural safeguards confirm that responsibilities inconsistent with the Equality Policy do not continue in current roles.

Student Affairs: Cultural Centers as Student Success and Resource Hubs

The four centers previously under OIDI (Upperman African American Cultural Center, Centro Hispano, the Mohin-Scholz LGBTQIA Resource Center, and the Asian Heritage Cultural Center) now operate under the Division of Student Affairs as Student Success and Resource Centers. These centers support all UNCW students through academic enrichment, mentoring, leadership development, wellbeing, and belonging.

To ensure alignment with UNC System policy, Student Affairs implemented a programming rubric that requires all center-sponsored events to be open to all students, non-partisan, and non-ideological. Previous center activities that involved advocacy, activism, or contemporary political or social issues were removed. Collaboration with student organizations is encouraged to support inclusive student-led initiatives consistent with policy expectations. While center staff may provide guidance or logistical support to student organizations, which are exempt from the Equality Policy, they do not lead or coordinate student-led programming.

Academic Affairs: SEER Unit and Broader Student Success Efforts

Several former OIDI employees were also placed within the Student Engagement, Enrollment, and Retention (SEER) unit in Academic Affairs. These roles focus on recruitment, academic transition, engagement, advising, and persistence through graduation. SEER staff collaborate closely with colleges and campus offices to identify and address barriers to success, strengthen pathways to degree completion, and support holistic student development.

UNCW has a longstanding commitment to supporting precollege outreach, with nearly 20 distinct programs serving K-12 students across the university. To strengthen this work, the Precollege Programs unit within SEER was expanded to coordinate efforts, consolidate resources, and enhance engagement with prospective college-bound students across North Carolina.

This realignment brings together multiple initiatives under one unit to streamline operations while preserving broad access. All programs housed within the Precollege Programs unit are open to any high school student and designed in alignment with the UNC System Equality Policy, ensuring they do not restrict participation based on background or identity. The unit oversees a range of offerings focused on academic readiness, college awareness, and early exposure to the university experience. As part of this effort, several programs were moved into the unit to increase coordination and efficiency including: Upward Bound Math and Science, a federally grant-funded program previously housed in Student Affairs; Precollege Mentoring Program, formerly known as MI CASA (Mentors Initiating Community Action, Support, and Advocacy) originally part of the Office of Institutional Diversity and Inclusion; and AdviseNC, a college access program supported by the Belk Foundation.

This structure ensures that all precollege initiatives, whether part of the SEER unit or offered elsewhere across campus, clearly align with UNCW's educational mission, comply with institutional neutrality standards, and serve a diverse population of students. In 2024–25 alone, UNCW's precollege programs reached more than 13,000 prospective students from a wide range of backgrounds. The university will continue to examine the efficacy of these programs on student success.

Continuing and Additional Savings

Savings generated from position eliminations in the 2024 compliance report, totaling approximately \$1.45 million annually, remain reallocated to student success initiatives: \$379K to support five positions within Student Engagement, Enrollment, and Retention (SEER) under Academic Affairs; \$298K to support for permanent and one part-time position within Campus Life center operations under Student Affairs; and \$760K to need-based financial aid.

UNCW conducted a comprehensive review of fund accounts previously associated with OIDI to ensure alignment with the Equality Policy and institutional priorities. Following this review, all OIDI accounts were closed, and associated funding of approximately \$170,000 of one-time money was reallocated to support strategic university efforts. Two funds, totaling \$10,000 in unspent endowment distributions associated with the Upperman Center and Mohin-Scholz Center were redirected to Student Affairs as budget authority.

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:

Since the submission of UNCW's 2024 Annual Certification, the university has implemented additional, concrete actions to strengthen and sustain compliance with the Equality Policy. These efforts have focused on reinforcing institutional neutrality, ensuring equal access to programs and services, and embedding Policy requirements into daily operations.

Campus Communications, Trainings, and Dialogues

In August 2024, the Office of the General Counsel distributed written guidance on the Equality Policy to all Vice Chancellors. This memo, which remains linked on the Office of General Counsel's website, outlined the university's commitment to academic freedom while clarifying faculty obligations to comply with the new policy. Former Provost Winebrake subsequently forwarded the guidance to all deans and Associate Provosts, who shared it with their respective leadership teams.

Campuswide updates were issued by the Chancellor in August 2024, September 2024, and June 2025 to students, faculty, and staff, reaffirming the university's commitment to institutional neutrality and equal treatment. Human Resources distributed memoranda in September 2024 reminding employees of political activity limitations and outlining expectations for maintaining neutrality in all university functions.

To support these messages with practical guidance, Equality Policy update and/or training sessions were conducted in August 2024 for the entire Student Affairs division and additional targeted trainings in September 2024 for Student Affairs directors, all Campus Life staff, and staff within the Student Affairs centers. In addition, media training was facilitated by the Office of University Relations (OUR) with Student Affairs center coordinators in September 2024 and with Academic Affairs Deans Council in January 2025. In February 2025, former

Provost Winebrake provided a report to the Faculty Senate addressing the implications of the Equality Policy and the February 5 System Office memorandum.

The Office of General Counsel partnered with all the divisions on campus to ensure that it fielded and advised on any questions raised by the policy and the memoranda. During the fall of 2024 and into the spring of 2025, the General Counsel conducted "guidance dialogues" with various campus constituencies. These included briefings for Faculty Senate and Staff Senate and discussions with student organizations and advisory groups. Further, the General Counsel met with the leadership and divisions within the College of Health and Human Services: Nursing, School of Health & Applied Sciences, Social Work; Watson College of Education; the Library; the College of Science and Engineering: Environmental Science and Biology; the Cameron School of Business, and the College of Humanities, Social Sciences and the Arts. During and after these meetings, the Office of General Counsel has provided a constant source of information and advice on the interpretation and implementation of the policy.

UNCW took active steps to inform and educate students about the Equality Policy and the university's compliance efforts. In August 2024, the Vice Chancellor for Student Affairs issued a targeted student announcement outlining the closure of OIDI in accordance with UNC System Policy and the realignment of the four centers under Student Affairs. The message emphasized the university's ongoing commitment to providing supportive and inclusive spaces for all students. It also detailed how the new structure would integrate the centers into a broader student support network, enhance collaboration across Student Affairs, and maintain valued services while aligning with policy requirements. In addition to written communications, senior administrators engaged students directly through Cabinet-level participation in Student Government Association (SGA) town hall meetings in September 2024 and April 2025, and the Vice Chancellor for Student Affairs and former Provost hosted monthly meetings with students throughout the academic year. The se combined efforts ensured transparency, encouraged dialogue, and reinforced UNCW's commitment to institutional neutrality while continuing to prioritize student engagement, success, and wellbeing.

In August 2025, prior to the start of the new academic year, several messages were shared across campus. Interim Provost Burrus sent two messages to all senior academic leaders at the university, including deans and associate provosts, reminding them of the Equality Policy and relevant state statutes and encouraging them to share the guidance with faculty. These messages further invited faculty to direct any questions to the Office of General Counsel for clarification. Student Affairs sent a message to the entire division with a reminder of Policy 300.8.5 and provided clear guidance on programmatic compliance. Finally, the university instituted a mandatory online training module for all faculty and staff.

Webpage and Personnel Recruitment

In partnership with the Office of University Relations (OUR), Office of General Counsel (OGC), and Information Technology Services (ITS), UNCW conducted a comprehensive, university-wide website audit to ensure compliance with the Equality Policy. This review began in August 2024 and identified approximately 800 webpages for closer assessment for Equality Policy content alignment, with fewer than 115 pages remaining under review at the end of July 2025. Following additional assessment, fewer than 10 pages remain under review. As part of this process, outdated references to the former Office of Institutional Diversity and Inclusion (OIDI) were removed or revised to reflect current structures and ensure consistency with institutional neutrality requirements. As System, state, and federal guidance continues to evolve, the university will continue to adjust content to comply with legal requirements. In addition, UNCW developed a dedicated webpage to educate the campus community about the Equality Policy and outline the university's compliance efforts.

Human Resources updated its recruitment and hiring resources, processes, and websites to ensure full alignment with the Equality Policy and applicable state and federal laws. These changes included discontinuing the "second look" Equal Employment Opportunity (EEO) review process, which previously required additional review of applicant pools to assess demographic representation before interviews were finalized. Additionally, faculty and staff search committee training programs have undergone a complete overhaul to eliminate any non-compliant content, including links to external diversity-related resources, and to ensure all training materials align with current policy requirements.

Programming

During the 2024–25 academic year, the four centers housed under Student Affairs hosted a total of 126 events, including 65 social programs, 19 mental health initiatives, 25 academic success and connection activities, and 17 cultural or heritage celebration events, compared to 262 the previous year under the Office of Institutional Diversity and Inclusion (OIDI). Programming in Student Affairs centers is open to the entire student body, consistent with the university's commitment to inclusivity and institutional neutrality. The centers celebrated 200 students who engaged with centers and graduated in December 2024 and May 2025. In alignment with the Equality Policy, the centers discontinued programmatic support for external community events not directly tied to UNCW's educational mission.

In Spring 2025, the precollege program formerly known as MI CASA (Mentors Initiating Community Action, Support, and Advocacy) was renamed the Precollege Mentoring Program

to better reflect its inclusive mission for all prospective students and alignment with UNCW's broader precollege outreach strategy. While MI CASA previously focused on serving Hispanic student populations, it was moved to Academic Affairs and broadened to be openly accessible to all North Carolina high school students. It continues to provide personalized mentoring, academic readiness support, community service, financial planning, and community activities, but now operates under the framework of UNCW's Precollege Programs unit, ensuring consistency with institutional neutrality and commitment to serving North Carolina's population of future college students. Recruitment programming in Admissions specific to particular student populations, including the Eleva Tu Futuro event for Hispanic students, was redesigned for Fall 2025 to ensure compliance with the Equality Policy. There are now no recruitment programs or activities solely for one student group or identity.

The Coastal Roots summer program, formerly housed under OIDI and designed to serve minority students, was moved to the Office of Admissions and renamed as the Summer Bridge program to ensure alignment with the Equality Policy. Summer Bridge focuses on academic skill development for any first generation, rural North Carolina students admitted to UNCW who can benefit from an intensive precollege academic experience before their first full-time semester. In summer 2025, 35 participants successfully completed the program, each earning six academic credits during Summer Session II.

Academics and Scholarships

In February 2025, UNCW reviewed the UNC System Office's directive to suspend mandatory curricular and program requirements related to diversity, equity, and inclusion (defined in Section VII of the Equality Policy as those requirements which compel students to "affirm or profess belief" in the concepts listed in G.S. 126-14.6(c)(1)-(13)), placing particular emphasis on the directive's provision that the suspension applies "so long as no student is compelled to enroll in such a course."

UNCW conducted a comprehensive review of all required course offerings to determine whether any met the definition of a mandatory DEI-related requirement, either at the general education level or within program-specific, required curricula. Particular attention was given to required courses in majors, to assess whether students were compelled to "affirm or profess belief" in the concepts identified in the statute. This review confirmed that students are not required to affirm or profess belief in any DEI-related concepts.

The university also recently reviewed materials used in UNI 101, a required course for all first-year students, including videos exploring evolving interpretations of the nation's founding principles and significant historical events; the material could be perceived as requiring

agreement with particular viewpoints depending on how the videos are presented. Beginning in Fall 2025, these videos were designated as optional, with an alternative assignment available for students who preferred not to complete work based on the video content. Faculty were provided with standardized syllabus guidance to ensure that students were clearly informed of their choices. This adjustment preserves academic freedom while ensuring that students retain flexibility and clarity in their coursework.

The university also evaluated its general education program. The "Living in Our Diverse Nation" category includes a broad array of nearly 90 courses through which students may satisfy the requirement, offering students multiple pathways to completion. As such, no student is compelled to enroll in a course that promotes diversity, equity, and inclusion (DEI)-related concepts. Following the academic curriculum review, Chancellor Volety and former Provost Winebrake submitted a letter to the System Office in May 2025, affirming compliance with the System directive.

UNCW acknowledges that while the general education theme of "diverse" in the "Living in Our Diverse Nation" requirement may create confusion, the requirement itself does not compel students to adopt a particular ideology. The category was established over fifteen years ago, to encourage examination of the cultural, historical, and social forces that shape communities. While individual courses may explore topics such as race, ethnicity, class, gender, age, socioeconomic status, disability, religious belief, or sexual identity, no course requires adherence to DEI-related concepts. To alleviate any confusion, the title of the requirement and the student learning outcomes associated with the theme are under further review.

In parallel with the academic review, UNCW also proactively examined privately-funded scholarships to ensure compliance with the Equality Policy and related legal requirements of donor agreements. This review focused on reassigning award authority from Office of Institutional Diversity and Inclusion (OIDI) to new award authorities, aligning private donor-funded opportunities with institutional neutrality while maintaining broad access for students, and protecting the integrity of donor intent. Scholarship language will continue to be reviewed to confirm that eligibility criteria are compliant.

UNCW remains fully committed to the continued implementation of the Equality Policy and to ensuring full compliance with all current and future guidance issued by the UNC System Office. We recognize that this work is not static and requires continuous assessment and improvement. To that end, the Chancellor has charged Cabinet members to meet regularly to review ongoing compliance efforts, evaluate progress, and respond to evolving expectations. Updates from these discussions will be shared with the Board of Trustees

Subcommittee on Equality Policy Compliance on a quarterly basis to ensure transparency, accountability, and institutional alignment.

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:

To strengthen governance oversight of Equality Policy implementation, the UNCW Board of Trustees established a dedicated Subcommittee to monitor and assess the university's ongoing compliance efforts. Appointed by the Board Chair, this Subcommittee serves as a key advisory body, receiving briefings from the Chancellor and senior administrators, reviewing compliance-related actions, and providing feedback to university leadership.

The Equality Policy Subcommittee members were appointed by Board of Trustees Chair Hugh Caison on July 31, 2025, and include Trustees Dr. Jimmy Tate (Chair), Ms. Traci Butler, Ms. Frances "Perry" Chappell, Mr. Dane Scalise, and Mr. Skyler Stein (Student Body President). Since its formation, the Subcommittee has convened on the dates listed below to review operational changes, personnel updates, training initiatives, and other measures taken to ensure the university's full adherence to the Equality Policy.

Meetings of the Equality Policy Subcommittee have occurred on: August 13, 2025 - UNCW campus/virtual meeting format August 25, 2025 - UNCW campus/virtual meeting format

The Subcommittee was provided with a comprehensive overview of how UNCW continues to align its operations with the UNC System Equality Policy and verified the university's efforts at its August 25, 2025, meeting.

As part of its charge, the Board of Trustees Subcommittee on Equality Policy Certification convened two meetings to receive updates from university leadership on steps taken since the 2024 certification. These briefings covered personnel realignments, programmatic adjustments, communication strategies, training efforts, website updates, and reviews of curriculum and scholarships.

In response to these briefings, the Subcommittee engaged in thoughtful and constructive dialogue with university leadership and recommended the following institutional actions to support full and continued alignment with System policy, enhance transparency, and reinforce UNCW's student success priorities.

First, the Subcommittee noted the value of offering guidance to faculty, particularly in required courses such as UNI 101, to raise awareness that students who select alternative assignments due to equality concerns continue to maintain their right to impartial evaluation. Such guidance would support student rights and academic freedom under the Equality Policy and would be in alignment with the UNC Policy Manual, Section 608. Academic Affairs is currently planning to distribute this message to all UNI 101 instructors within the first few weeks of the Fall 2025 semester to reinforce these expectations.

Second, the university should establish a structured process to collect and analyze data regarding the impact of the four Student Success and Resource Centers on measurable student outcomes. Student Affairs is currently collaborating with the Office of Institutional Research and Planning to develop data collection strategies, with implementation planned for the 2025–26 academic year. Key metrics will include student participation, program effectiveness, student satisfaction, sense of belonging, and retention and persistence. This ongoing assessment will ensure that programming remains inclusive, aligned with institutional goals, and compliant with UNC System policy.

Finally, UNCW should continue its regular engagement with the UNC System Office and the Board of Governors to support sustained compliance with the Equality Policy. This includes seeking ongoing clarification and interpretation of evolving state and federal guidance, ensuring consistent policy alignment across all campus divisions, and requesting formal affirmation of institutional compliance where appropriate.

Additionally, the Subcommittee encourages continued collaboration with the System Office in the development of future certification materials. Notably, Subcommittee members emphasized that providing institutions with additional lead time to review reporting templates and expectations in advance of submission deadlines would strengthen the quality of implementation efforts and reinforce a shared commitment to thoughtful, transparent compliance across the UNC System.

These recommendations underscore the Subcommittee's commitment to transparent governance, compliance, and continuous improvement in support of UNCW's mission and the success of all students.

Topics and presentations conducted during the two Subcommittee meetings were as follows:

August 13, 2025 – Welcome & Committee Charge by Dr. Aswani Volety, Chancellor; Briefing on 2024 Campus Operations Related to UNC System Equality Policy by Dr. Christine Reed

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Davis, Vice Chancellor for Student Affairs; Briefing on Personnel Disciplinary Action by John Scherer, General Counsel.

August 25, 2025 – Welcome & Remarks by Dr. Aswani Volety, Chancellor; Follow Up Questions from August 13, 2025, Meeting by Dr. Christine Reed Davis, Vice Chancellor for Student Affairs; 2025 Equality Policy Compliance Briefing and Certification Update by Dr. Christine Reed Davis; Personnel Briefing by Assoicate Vice Chancellor for Human Resources, Lori Preiss.

University of North Carolina at Wilmington

Title:_Chancellor

Title: Vice Chancellor for Student Affairs

Name: Dr. Aswani K. Volety

Name: Dr. Christine R. Davis

Date: August 29, 2025

Date: August 29, 2025