

2025 CERTIFICATION & REPORT
EQUALITY WITHIN THE UNIVERSITY OF NORTH CAROLINA
August 26, 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 Western 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:

Western Carolina University (*WCU* or *University*) closed the Department of Intercultural Affairs (*ICA*) in mid-June 2025 and reassigned the remaining employees, an Associate Director and a temporary employee, to the Division of Student Success. At that time of closure, the following ICA positions were unfilled due to turnover and were cancelled: Director, Assistant Director, 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.

Administrative Assistant. On August 1, 2025, a reorganization was announced forming the Division of Enrollment Management and Student Success. Later in August, it was announced that the office space that once housed ICA would be assigned to the Division of Enrollment Management and Student Success becoming the Student Success Collaborative, a space for all students.

The former ICA positions (the Associate Director and the temporary position) are now assigned to the Office of Student Retention within the new Division of Enrollment Management and Student Success. The Associate Director job duties have been updated for 2025-26, and the temporary position employment period ended in mid-August. ICA student success initiative Project CARE, a student mentoring program for new students, as well as programming to celebrate graduates are continuing and are open to all students.

The ICA office was funded in 2024-25 from Activity Fee receipts. In 2025-26, those funds have been reallocated into the Activity Fee receipts pool to offset inflationary budget pressures and will be utilized to enhance co-curricular experiences for all students, including student success activities.

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:

In August of 2024, a campus open forum was convened to deliver Equality Policy-related comments and answer questions. The forum panel included the Chancellor, Provost, Vice Chancellor for Student Affairs, and General Counsel. More than two hundred faculty and staff were in attendance.

On September 5, 2024, Shea Browning, General Counsel, presented the Equality Within the University of North Carolina policy (***Equality Policy***) to the Board of Trustees for Western Carolina University (***WCU Board***) and invited questions and comments. The topics included WCU Board responsibilities, WCU's responsibilities, and employee responsibilities.

In October 2024, the Chancellor presented to the WCU Faculty Senate on the Equality Policy in both her spoken and written comments.

Since the last certification, the Legal Counsel Office has trained several offices, amounting to more than 300 employees, on the Equality Policy. In addition, the Legal Counsel Office has answered many questions regarding interpretation of the Equality Policy, has revised university documents, and has provided general compliance-related advice.

Staff in Human Resources and Payroll revised HR procedures, modified campus interview questions, revised search committee training materials, and rewrote general training materials. HR

continually reviews job postings to ensure that no application requirements violate the Equality Policy. In the fall of 2024, the Office of Internal Audit performed a review of active job postings looking for language that could violate the Equality Policy. The University will work with Internal Audit to repeat the review and make it a regular occurrence.

Academic units across campus have reviewed and continue to review mission statements and other foundational documents to ensure compliance.

As discussed in Point II above, WCU closed its Department of Intercultural Affairs. Although ICA had realigned its mission to comply with the Equality Policy, Chancellor Brown felt that, given the vacant ICA positions at the end of the academic year, closure was the best way to address the persistent perception that the ICA office was not in compliance with the Equality Policy. The office space associated with ICA in the University Center is being reimagined as a student success-oriented space for all students and will be called the Student Success Collaborative.

A previously planned redesign of the WCU website has allowed the University to seize on an opportunity to review and eliminate problematic legacy content, define acceptable content, and better control the content that appears on the website. This process is ongoing.

The Legal Counsel Office continues to review University policies to ensure compliance.

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:

The Subcommittee on Equality Policy Certification (***Subcommittee***) was appointed by the WCU Board, at the direction of WCU Board Chair, Mr. Casey Cooper, on July 10, 2025. The Subcommittee is made up of the following WCU Board members: Mr. Jon Hardister, Chair; Ms. Becky Brown, Vice-Chair; Mr. Joe Crocker; Mr. Ken Hughes; and Ms. Susan Strum.

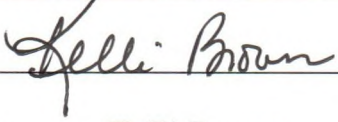
The Subcommittee met via the Zoom video platform at 3:00 pm on August 27, 2025, and reviewed this 2025 Equality Certification and Report (***Certification***). In addition to this Certification, the Subcommittee received training on the Equality Policy; received information related to the realignment of offices and roles; and received a report detailing WCU's ongoing training and other compliance efforts. The Subcommittee reviewed proposed dates and times for future meetings. Finally, the Subcommittee discussed one personnel-related agenda topic in closed session.

A report from the Subcommittee will be made to the full WCU Board at its September 5, 2025, regular meeting.

The Subcommittee was pleased with the content provided, asked several questions, and made no recommendations regarding future content or actions.

**WESTERN CAROLINA
UNIVERSITY**

Title: Chancellor

By: 

Name: Kelli Brown

Date: August 27, 2025

Title: Vice Chancellor for Student Affairs

By: 

Name: Sam Miller

Date: August 27, 2025

**BOARD OF TRUSTEES
OF
WESTERN CAROLINA UNIVERSITY**

**SUBCOMMITTEE ON EQUALITY POLICY CERTIFICATION
EXECUTIVE OVERVIEW**

This Executive Overview (*Overview*) will provide additional information to the Board of Trustees of Western Carolina University Subcommittee on Equality Policy Certification (*Subcommittee*) of the University's activities in support of compliance with the *Policy on Equality Within the University of North Carolina (Equality Policy or Policy)*.

Since the Equality Policy was approved in May 2024, Western Carolina University (*WCU or University*) has made great efforts to comply with the new directives. As will be discussed in more detail below, the University has leveraged the relationship between members of its executive leadership team, fortuitous website development plans, and a top-down review of policies and practices to encourage adoption and compliance. WCU fundamentally supports a culture of compliance and will continue to implement Equality Policy compliant policies, procedures, and directives.

Compliance Methodology

The Equality Policy requires ongoing monitoring of WCU activity and yearly certification of compliance. For this reason, a compliance methodology was developed by the Legal Counsel Office (*Legal Office*) after consultation with the Chancellor. The compliance methodology includes:

- Communication and information requests made to the University's executive leadership team, which includes all Vice-Chancellors, the Chief of Staff, Director of Athletics, the Director of Information Technology and the Assistant to the Chancellor;
- Communication and information requests made to University Deans and Directors;
- Identification of specific high-risk and public-facing University offices and employees, the development of specific and focused training, and timely, mandatory training opportunities;
- Identification and review of key University policies and procedures; and
- Development of training material, executive talking points, and educational material.

Compliance Activities

- **WCU Strategic Plan:** Goals associated with the WCU Strategic Plan related to Academic Excellence, Student Experience and Inclusive Excellence were modified to remove language supporting the efforts of the prior policy and University of North

Carolina guidance and align with the Equality Policy.

- **Executive Leadership:** To better report University compliance with the Equality Policy, the Legal Office asked the executive leadership to inform it of any mission statement; procedure or practice; job description change made in response to the Equality Policy. This is an ongoing request and has been successful.
- **Website Alterations:** A planned website redesign allowed University administrators to review web content and identify and revise material to align with the Equality Policy. The Division of Marketing and Communications and the Legal Office have created a process for reviewing web-based content regulated by the Policy. Please be advised, nothing ever truly disappears from the internet. Content created pursuant to the prior policy and UNC guidance may still appear as an output to a web search. The University remains prepared to review this outdated content and, if necessary, attempt to bring it into compliance with the Policy.
- **Policy and Procedure Review:** *University Policy 1 – Policy Development, Approval, and Review Procedures* has long required that new or revised University policies receive a review by the Legal Office prior to implementation. The required review now includes a special focus on Equality Policy compliance. Outside of University policies, the Legal Office has included Equality Policy compliance in its review of University, College, Division, etc. procedures. In addition, it is not uncommon for Divisions to partner with the Legal Office for the purpose of a compliance review. The Division of Human Resources and Payroll included the Legal Office in its review of internal procedures, reporting, training, and communication materials, resulting in the withdrawal, revision, or continued use of compliant materials.
- **Office and Staff Realignment:** The Office of Equal Opportunity and Diversity Programs and the Chief Diversity Officer position were abolished in 2024 as reported in the 2024 Equality Policy Certification. In June 2025, the Department of Intercultural Affairs (*ICA*) was abolished, and open positions were not filled. The remaining single permanent staff position and the single temporary position from this office, including their salary and fringe benefits, were reassigned to the Division of Academic Affairs. Financial savings resulting from the closure of ICA and from the vacant staff positions have been reallocated within the Division of Student Affairs and the Division of Enrollment Management and Student Success. Administrators reviewed programs once provided by ICA to determine compliance with the Policy. One such program, Project Care, a longstanding program at WCU, is now housed in the Division of Enrollment Management and Student Success. Finally, the office space associated with ICA is being reimagined as a student success-oriented space and will be known as the Student Success Collaborative.
- **Legal Office Engagement:** The Legal Office made compliance with the Equality Policy a priority goal. In August 2024, the General Counsel presented the Equality Policy to a meeting of the General Faculty and later participated on a separate Equality Policy related panel discussion directed at faculty, staff, and students. Staff frequently answer questions related to EHRA and SHRA staff activities; division and department initiatives; faculty authority inside and outside the classroom; university speakers brought by WCU

and by external entities; and when can the University speak on a matter of public importance. Compliance is what we do; so, we are prepared for this conversation.

Conclusion

Western Carolina University is committed to compliance with the Equality Within the University of North Carolina policy. The University's administration expects to continue efforts to review policies, procedures, guidance, and perform other activities that will positively impact the University's culture of compliance and provide information to our faculty, staff, students, and greater university community.